

**Federal Transit Administration
Cheshire County Civil Rights Title VI Transit Program
Wednesday, June 17, 2026**

(Plan expires 3 years from date approved by the board)

TITLE VI PLAN TABLE OF CONTENTS

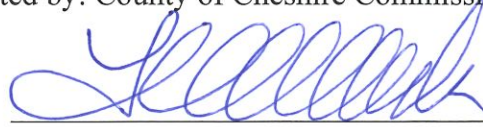
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SECTION 1: TITLE VI PLAN APPROVAL & COMPLIANCE REQUIREMENTS

Title VI Plan Adopted on: 17 June 2026

Adopted by: County of Cheshire Commissioners

Signature(s): 
Commissioner Chair Terry Clark

Certificate of Vote

I, Skipper DiBernardo, County of Cheshire Commissioner Clerk, do hereby certify that I am a duly elected Officer of the County of Cheshire. I hereby certify the following is a true copy of a vote taken at a meeting of the Commissioners of the County of Cheshire duly called and held on June 17, 2026, at which a quorum of the Commissioners was present and voting.

VOTED: That the County of Cheshire Commissioners adopt the Federal Transit Administration Title VI Transit Program Plan and County of Cheshire Commissioner Chair Terry Clark is hereby authorized on behalf of the County of Cheshire to execute the Plan.


I hereby certify that the foregoing resolution has not been amended or repealed and remains in full force and effect as of the date of the execution of this document. I further certify that it is understood that the State of New Hampshire will rely on this certificate as evidence that the person listed above currently occupies the position indicated and that they have full authority to bind the Municipality. This authority remains valid for thirty (30) days from the date of this Certificate of Authority.


Commissioner Clerk, Skipper DiBernardo

STATE OF NEW HAMPSHIRE
County of Cheshire

The forgoing instrument was acknowledged before me this 17th day of June, 2026 by Skipper DiBernardo.




Printed Name: Kim May
Commission Expires: 2/5/30

Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
2/15/2017	All	Initial adoption
7/18/2018	All	Updated entire plan
7/12/2023	All	Updated entire plan
7/8/2026	All	Updated entire plan

SECTION 2: TITLE VI TRANSIT POLICY STATEMENT

Policy Statement

The County of Cheshire, operating as a lead agency, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New Hampshire Department of Transportation (NHDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and NHDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The County of Cheshire operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

SECTION 3: TITLE VI TRANSIT NOTICE TO THE PUBLIC

The County of Cheshire Notice to the Public is as follows:

The County of Cheshire operates its programs and services without regard to actual or perceived race, color, or national origin in accordance with Title VI of the Civil Rights Act Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title IV may file a complaint with the County of Cheshire.

For more information on County of Cheshire’s civil rights program, the procedures to file a complaint, and/or if information is needed in another language, please contact the County Administrator at 603-355-3031, ccoates@co.cheshire.nh.us, or visit our administrative office at 12 Court Street, Keene, NH, Monday through Friday (excluding holidays) between 8:00 a.m. and 4:00 p. m.

For transportation-related Title VI matters, a complaint may also be filed directly with the:

1. New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov
2. Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 603-355-3031.

The County of Cheshire Notice to the Public is posted in the public area of the agency’s headquarters at 12 Court Street Keene, NH and on its website: <https://co.cheshire.nh.us/about-cheshire-county/legal/#Civil>.

SECTION 4: TITLE VI COMPLAINT PROCEDURE

County Grievance Procedure

The County of Cheshire's Title VI Transit Complaint Procedure included as part of this Title VI Transit program is made available in this Agency Title VI Transit plan, the agency's website, and a hard copy in the central office.

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the County of Cheshire may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the County no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the County of Cheshire will review it to determine if its office has jurisdiction. A copy of each Title VI Transit complaint received will be forwarded to the New Hampshire Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the County.

The County of Cheshire has 45 days to investigate the complaint. If more information is needed to resolve the case, the County of Cheshire may contact the complainant and request additional information. The complainant will have a specified number of days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within the specified number of days, the County of Cheshire can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 15 days after the date of the closure letter or the letter of finding to do so. The appeal process information will be included in the letter.

A person may also file a complaint directly with the:

-) New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov
-) Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact (603) 355-3031.

SECTION 5: TITLE VI TRANSIT COMPLAINT FORM

The County of Cheshire Title VI Transit Complaint Form is made available in this Agency Title VI Transit plan, the agency's website, and a hard copy in the central office.

Civil Rights Title VI Complaint Form

Name: _____ Date: _____

Address: _____

Phone: _____ Email: _____

Accessible format requirements: Large print Audio Other _____ N/A

Are you filing this complaint on your own behalf? Yes No

If yes, provide the name of the person completing this form: _____

Relationship: _____

Reason for third party filing? _____

Confirm that you have obtained the permission of the aggrieved party? Yes No

I believe that I have been (or someone else has been) discriminated against on the basis of (check all that apply):

Race Color National origin

Other: _____

Confirm that you believe that a county department, office, or an organization has failed to comply with Civil Rights Title VI.

Have you previously filed a civil rights complaint against the county? Yes No

If yes, when was the complaint filed? _____

Have you filed this complaint with the Department of Transportation? Yes, federal DOT Yes, NH-DOT

No

If yes, please attach a copy of any response you received to your complaint.

Have you filed a lawsuit regarding this complaint? Yes No

If yes, attach any related material and provide the case number and/or date:

Name of service provider, department, office, or organization the complaint is against:

Contact person name and title: _____

Phone: _____ Email: _____

On separate pages, please attach a description of your complaint. You should include specific details such as names, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint, including any related correspondence.

Signature: _____ Date: _____

Please submit this form by any method to: Chris Coates, County of Cheshire, 12 Court St, Keene, NH 03431, 603-355-3031, cocoates@co.cheshire.nh.us

SECTION 6: LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

The County of Cheshire maintains a list or log of all Title VI Transit investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.**
- There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

SECTION 7: PUBLIC PARTICIPATION PLAN

Strategies and Desired Outcomes

To promote inclusive public participation, the County of Cheshire grants department will serve as treasurer on the Monadnock Region Coordinating Council for Community Transportation “MRCC”. The MRCC meets monthly and has broad representation from as many as twenty transit providers, and transit service-related agencies and stakeholders. Meetings are publicly noticed through newsletters, email, and other similar no-cost options, and are open to the public. Meetings are held hybrid with in person and virtual attendance options. Meetings are held at the headquarter offices of Southwest Region Planning Commissioner in an accessible building with other accommodations available upon request. Additionally, at least once per year, the County Commissioners have an agenda item related to its fiscal sponsoring of transit-related programs (e.g. application submission, awarded acceptance, FTA Assurances adoption, and grants department’s reports to the commissioners). Commissioners meet weekly in rotating locations (central office, Department of Corrections, Maplewood Nursing Home, and Cheshire EMS). All commissioner meetings are publicly noticed, open to the public, and are held hybrid in-person and virtual, and in accessible locations with other accessible accommodations available upon request.

Public Outreach Activities

The public outreach and involvement activities conducted by the County of Cheshire since the last Title VI Transit Program submission are summarized in the table below.

Event Date	County of Cheshire	Activity	Communication Method (Public notice, posters, social media)	Notes
Weekly	Board of Commissioners	Local Governance (general)	Commissioner meetings are open to the public. Members of the public may provide comments and inputs in person at the meetings, or in writing before the meetings. Meetings are publicly noticed and conducted according to the laws of the State of New Hampshire. See the current schedule posted on the County's website. The County encourages members of the public to attend and provide input.	Wed at 8:30am at rotating sites
Monthly	Transportation	Regional Coordinating Council Meetings	Meets monthly; noted via host website, bimonthly email and monthly direct mail newsletters.	4 th Tues at 9:00am at SWRPC

SECTION 8: TRANSIT LANGUAGE ASSISTANCE PLAN

Plan Components

As a recipient of federal US DOT funding, the County of Cheshire is required to take reasonable steps to ensure meaningful access to our transit programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The County of Cheshire Language Assistance Plan includes the following elements:

1. The results of the Four Factor Analysis, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the County of Cheshire has conducted a Four Factor Analysis of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the County of Cheshire will identify:

1. How LEP persons interact with the recipient's agency;
2. Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;

3. Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program:

Identifies and assesses the frequency County of Cheshire staff comes into contact with LEP persons. Examples of contact could include:

- a. Use of bus and rail service;
- b. Purchase of tickets through vending machines, outlets, websites, and over the phone;
- c. Participation in public meetings;
- d. Customer service interactions;
- e. Ridership surveys;
- f. Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 –Results of the Four Factor Analysis (including description of LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Cheshire County does not directly provide transit services to the public. Rather, the County serves as a fiscal agent and pass-through grantee for Federal Transit Administration (FTA) funding administered by the New Hampshire Department of Transportation, disbursing those funds to four subrecipient agencies that operate transit and transportation services within the region. As such, LEP individuals likely to be encountered through this program are those served by or seeking services from the County's subrecipients.

Cheshire County is a predominantly English-speaking rural county in southwestern New Hampshire. According to the U.S. Census Bureau's American Community Survey (ACS) 2024 5-Year Estimates (Table C16001), of the county's population 5 years and over (73,846), approximately 96.3% (71,146) speak only English at home. The total LEP population—defined as those who speak English less than "very well"—is approximately 586 persons, or roughly 0.79% of the population 5 years and over.

Among LEP individuals, the largest language groups are Spanish (176 persons), French, Haitian, or Cajun (126 persons), and Chinese, including Mandarin and Cantonese (77 persons). Smaller numbers of LEP persons speak German or other West Germanic languages (48), Russian, Polish, or other Slavic languages (46), other and unspecified languages (30), other Indo-European languages (26), Tagalog including Filipino (24), other Asian and Pacific Island languages (24), and Vietnamese (9). No single language group other than Spanish exceeds the Safe Harbor threshold of 1,000 persons or 5% of the population.

Given the small overall LEP population and the rural character of the region, the proportion of LEP persons eligible to be served or likely to be encountered through the transit services funded under this program remains low and is estimated to be on average less than one person per year. Nevertheless, Cheshire County recognizes its obligation to ensure that subrecipients have policies and practices in place to identify and meaningfully serve LEP individuals who may seek or rely on transit services.

Cheshire County, NH Population	Estimate	%
Total:	73,846	
Speak only English	71,146	96.34%
Spanish:	708	
Speak English "very well"	532	
Speak Spanish, and English less than "very well"	176	0.24%
French, Haitian, or Cajun:	575	
Speak English "very well"	449	
Speak French, Haitian, or Cajun, and English less than "very well"	126	0.17%
German or other West Germanic languages:	190	
Speak English "very well"	142	
Speak German or other West Germanic languages, and English less than	48	0.07%
Russian, Polish, or other Slavic languages:	259	
Speak English "very well"	213	
Speak Russian, Polish, or other Slavic languages, and English less than "very	46	0.06%
Other Indo-European languages:	441	
Speak English "very well"	415	
Speak other Indo-European languages, and English less than "very well"	26	0.04%
Chinese (incl. Mandarin, Cantonese):	132	
Speak English "very well"	55	
Speak Chinese (incl. Mandarin, Cantonese), and English less than "very well"	77	0.10%
Vietnamese:	9	
Speak English "very well"	0	
Speak Vietnamese, and English less than "very well"	9	0.01%
Tagalog (incl. Filipino):	93	
Speak English "very well"	69	
Speak Tagalog (incl. Filipino), and English less than "very well"	24	0.03%
Other Asian and Pacific Island languages:	31	
Speak English "very well"	7	
Speak Other Asian and Pacific Island languages, and English less than "very	24	0.03%
Other and unspecified languages:	259	
Speak English "very well"	229	
Speak Other and unspecified languages, and English less than "very well"	30	0.04%

Citation: U.S. Census Bureau. "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001, 2024. Cheshire County, New Hampshire (FIPS: 33005). Available at: <https://data.census.gov/table/ACS5Y2024.C16001>. Accessed June 10, 2026.

Factor 2: The frequency with which LEP persons come into contact with the program.

County of Cheshire assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. County of Cheshire provides no passenger trips per year; however, it is a fiscal sponsor of transportation programs. There have been zero times in which LEP persons came into contact with the program since Cheshire County has fiscally sponsored grant-funded transit programs, or since about 2010.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.

Cheshire County serves as the fiscal sponsor and pass-through grantee for FTA funding that sustains transit services across the region. In a rural county where fixed-route transit is largely impractical, the most vulnerable populations — older adults, people with disabilities, veterans, and those who cannot afford to drive — face daily isolation without access to transportation to reach medical appointments, groceries, and other essentials. By ensuring federal funds flow reliably to subrecipient providers, Cheshire County plays a foundational role in maintaining this critical mobility infrastructure for residents who have no other options.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

The County of Cheshire makes every effort to make its programs, services, and activities, accessible to LEP individuals. The County of Cheshire will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how language assistance services are provided, by language

The County of Cheshire has identified, developed, and uses the following:

- a. “I Speak” language cards to identify language needs in order to match them with available services.
- b. Bilingual staff list is maintained by human resources. The list includes languages spoken, contact information, and shift schedule. The staff member selected to assist shall be fluent in both English and the individual’s primary language and in the terminology used by the department.
- c. Language Line Solutions Personal Interpreter Program for language assistance services www.languageline.com transparent per-minute at \$3.95 audio or \$4.95 video.

Item # 3 – Description of how LEP persons are informed of the availability of language assistance service

In order to ensure that LEP individuals are aware of County of Cheshire language assistance measures, County of Cheshire provides the following:

- ✓ Employees are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is monitored and updated

County of Cheshire will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Transit Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census

as available, or when it is clear that the concentrations of LEP individuals are present in the County of Cheshire service area.

Item # 5 - Description of how employees are trained to provide language assistance

In order to provide continuous meaningful access to LEP individuals, the County will provide employee training on the content of the language access policy, plan, and procedures, including how to identify language access needs and how to access language assistance services. Training is provided at time of hire and as needed thereafter. This staff training is mandatory for staff who regularly or potentially interact or communicate with LEP individuals. Any staff members who communicate “in-language” to LEP individuals will be assessed and receive regular training on proper interpreting and translation techniques, ethics, specialized terminology, and other topics as needed.

LEP Policy

The policy of County of Cheshire is to take reasonable steps to provide meaningful access to LEP individuals accessing public services provided by the County. The policy is to ensure that language will not prevent staff from communicating effectively with LEP persons and that limited English proficiency will not prevent people from accessing County services. Language assistance shall include interpretation of written materials, forms, and documents. For deaf and hard of hearing persons, language assistance shall include auxiliary aids, services, and sign language interpreters as practicable. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served. The County will conduct a regular review of the language access needs of County residents and update this plan and policy as necessary.

“I Speak” Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果 说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	-	Russian
	-	Serbian
	आप हिंदी बोलते हं तो इस बक्स को चिह्नित करं	Hindi
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	Haitian Creole
	أنا أتحدث اللغة العربية	Arabic
	پر نشان لگائے تو اس باکس بولے یا اردو اگر آپ	Urdu

Log of LEP Encounters

Date	Time	Language Spoken by Individual <i>(if available)</i>	Name and Phone # of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

SECTION 9: MINORITY REPRESENTATION INFORMATION

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees. County of Cheshire has no non-elected transit-related boards, committees, or councils.

SECTION 10: PROVIDING ASSISTANCE TO AND MONITORING SUBRECIPIENTS

Does agency provide funding to subrecipients?

- No, the agency does not have subrecipients.
- Yes. If yes, list the subrecipient names:
 - a. Home Healthcare, Hospice and Community Services
 - b. Community Volunteer Transportation Company
 - c. Keene Senior Center
 - d. Southwest Regional Planning Commission

County of Cheshire monitors subrecipients by collecting Title VI Transit programs from the subrecipients listed above, which have been reviewed for compliance by NH-DOT. Cheshire County collects the Title VI Transit programs at the time of a new application to NH DOT and every three years after new updates. Close monitoring is conducted to track compliance and to confirm that relevant policies and reporting are being properly prepared and completed, to validate that documentation is being retained for possible review at a later point, and to monitor performance against applicable Title VI goals, and outcomes.

SECTION 11: TITLE VI EQUITY ANALYSIS FOR FACILITY ACQUISITION

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. County of Cheshire does not have a built facility.

SECTION 12: FIXED ROUTE TRANSIT PROVIDERS SERVICE STANDARDS AND POLICIES

County of Cheshire is not a fixed route transit provider.