Federal Transit Administration Title VI Program

County of Cheshire

Wednesday, 12 July 2023

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

Title VI Plan Table of Contents

The **County of Cheshire's** Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan Adopted on:	12 July 2023
Adopted by:	County of Cheshire Commissioners
Signature(s): Co	mmissioner Chair John "Jack" G. Wozmak, J.D

Approval: (Certificate of vote and meeting minutes as appropriate to be included here.)





12 Court Street, Keene, NH 03431 www.co.cheshire.nh.us

CERTIFICATE OF VOTE

I, <u>Terry M. Clark</u>, Cheshire County Commissioner Clerk, do hereby certify that I am a duly elected Officer of the <u>County of Cheshire</u>. 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** <u>12</u> <u>July 2023</u> at which a quorum of the Commissioners were present and voting.

VOTED: That the Cheshire County Commissioners adopt the <u>Federal Transit Administration</u> <u>Title VI Program</u> Plan and that <u>Commissioner Chair John "Jack" G. Wozmak, J.D. or County</u> <u>Administrator Christopher C. Coates</u> are 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I hereby certify that the foregoing resolution has not been amended or repealed and remains in full force and effect as of the date of the execution of this document.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.

Commissioner Clerk, Terry M. Clark

STATE OF NEW HAMPSHIRE County of Cheshire

The forgoing instrument was acknowledged before me this <u>12</u>th day of <u>July</u>, 2023 by <u>Terry M</u>. <u>Clark</u>.

Rodney Bouchard, Justice of the Peace Commission Expires: 4/8/2025

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Area Code 603

County Commissioners 352-8215/Fax 355-3026 * Registry of Deeds 352-0403/Fax 352-7678 * Finance Department 355-0154/Fax 355-3000 - 12
Court Street, Keene, NH 03431 * County Sheriff 352-4238/Fax 355-3020 * County Attorney 352-0056/Fax 355-3012 - 12
Court Street, Keene, NH 03431 * Alternative Sentencing/Mental Health Court 355-0160/Fax 355-0159 - 265
Washington St. Keene, N.H. * Department of Corrections 825
Marlboro Street, Keene, 03431 - 903-1600/Fax 352-4004 * Maplewood Nursing Home & Assisted Living 399-4912/Fax 399-7005 - TTY Access 1-800-735-2964 * Facilities 399-7300/Fax 357-357 * Human Resources 399-7317/399-7378 * Grants Department 355-3023/Fax 355-3000

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

County of Cheshire will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: February 1, 2023

Title VI Plan Revision Log

Date Month/day/ye ar	Section Revised	Summary of Revisions
12 July 2023	All	First submission

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.

Title VI Notice to the Public

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

Notifying the Public of Rights Under Title VI
County of Cheshire
• 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. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the County of Cheshire .
• For more information on the County of Cheshire civil rights program, the procedures to file a complaint, or to file a complaint, please contact Chris Coates, County Administrator at 603-355-3031 , email ccoates@co.cheshire.nh.us , or visit our administrative office at 12 Court Street, Keene NH 03431 . For more information, visit https://co.cheshire.nh.us/
• For transportation-related Title VI matters, a complaint may also be filed 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; <u>titlevi@dot.nh.gov</u>
Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5 th 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 at https://co.cheshire.nh.us/.

Section 4: Title VI Complaint Procedure

The County of Cheshire's Title VI Complaint Procedure is made available in the following locations:

Agency website: https://co.cheshire.nh.us/

Hard copy in the central office

Agency Title VI Plan

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 of Cheshire** 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 our office has jurisdiction. A copy of each Title VI 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 our office.

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 requesting further information. The complainant has **#** business 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 **#** business days, the **County of Cheshire** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A <u>letter of finding (LOF)</u> 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 **10** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. 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; <u>titlevi@dot.nh.gov</u>

Or

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**. <u>Section 5: Title VI Complaint Form</u>

The **County of Cheshire** Title VI Complaint Form is made available in the following locations:

- Agency website, if available: <u>https://co.cheshire.nh.us/</u>
- Hard copy in the central office
- 🛛 Agency Title VI Plan

County of Cheshire			
Title VI Complaint Form			

Section I:							
Name:							
Address:							
Telephone (Home):		Telephone (Work):				
E-Mail Address:							
Accessible Format	Large Print		Audio Tape				
Requirements?	TDD		Other				
Section II:							
Are you filing this complaint on your own behalf? Yes* No							
*If you answered "yes" to this q	uestion, go to Section III.		1				
If not, please supply the name a you are complaining:	nd relationship of the person	for whom					
Please explain why you have filed for a third party:							
Please confirm that you have obtained the permission of the aggrieved Yes No party if you are filing on behalf of a third party.							
Section III:			I	I			

I believe the discrimination I experienced was based on (check all that apply):					
Title VI: [] Race	[] Color	[] National Origin			
Other (specify):					
Date of Alleged Discrimi	ination (Month, D	ay, Year):			
persons who were invol	lved. Include the r	ned and why you believe you were name and contact information of th act information of any witnesses. If	e person(s) who dis	scriminated against	
_					
_					
Section IV					
Have you previously file	d a Civil Rights rel	lated complaint with this agency?	Yes	No	
Section V					
Have you filed this com	plaint with any otl	her Federal, State, or local agency,	or with any Federal	l or State court?	
[] Yes	[] No				
If yes, check all that app	oly:				
[] Federal Agency:					
[] Federal Court		[] State Agend	су		
[] State Court		[] Local Agend	су		
If marked Yes in Section complaint was filed.	V, please provide	e information about a contact perso	on at the agency/co	urt where the	
Name:					
Title:					
Agency:					
Address:					
Telephone:					
Section VI					

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

County of Cheshire Chris Coates, County Administrator 12 Court Street Keene, NH 03431 (603) 355-3031 ccoates@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 investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

х

There have been <u>no</u> 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.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **County of Cheshire** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the **County of Cheshire** since the last Title VI Program submission are summarized in the table below. Specific Public Participation activities are listed in the table below:

			Communication	
Event	County of		Method	Notes
Date	Cheshire	Activity	(Public notice, posters, social media)	
Weekly	Board of Commissioners	Local Governance (general)	All commissioner meetings are open to member of 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	Wed at 8:30am at rotating sites
			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.	
Monthly	Transportation	Transportation Advisory Committee Meetings	Public notices via agency website, bimonthly email and monthly direct mail newsletters.	
Monthly	Transportation	Regional Coordinating Council Meetings	Meets monthly; noted via host website, bimonthly email and monthly direct mail newsletters.	
Ongoing	Transportation	Coordinating Council Brochure and Regional Plan	Distributed electronically and at public events and meetings.	
Ongoing	Transportation	Community Transportation Services Directory	Distributed electronically and at public events and meetings.	
Quarterly	Transportation	Quarterly Planning Commission Meetings	Public notices via agency website, bimonthly email and monthly direct mail newsletters.	
Bi- monthly	Transportation	Transportation Articles	Articles on community transportation activities of agency and partners via newsletters, websites, and social media.	

Section 8: 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 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:

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

The County of Cheshire Language Assistance Plan can be referred to for further information and is available both separately and as an appendix to this document.

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:

- (a) How LEP persons interact with the recipient's agency;
- (b) 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;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) 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 a description of the LEP population(s) served)

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

Of the 72,967 residents in the **County of Cheshire** service area, 501 residents describe themselves as speaking English less than "very well". For the County of Cheshire service area, the latest U.S. Census Bureau data shows that among the area's population 0.69% speak English "*less than very well*." For these groups who speak English "less than very well", see table below:

Speak English less than "very well"	Totals	Percent of Population
Speak English less than "very well"	501	0.69%
Spanish	55	0.08%
French, Haitian, or Cajun	62	0.08%
German or other West Germanic languages	11	0.02%
Russian, Polish, or other Slavic languages	116	0.16%
Other Indo-European languages	40	0.05%
Korean	0	0.00%
Chinese (incl. Mandarin, Cantonese)	108	0.15%
Vietnamese	4	0.01%
Tagalog (incl. Filipino)	1	0.00%
Other Asian and Pacific Island languages	18	0.02%
Arabic	52	0.07%
Other and unspecified languages	34	0.05%

Southwest New Hampshire Region LEP Persons

Source: American Community Survey, 2021; 5-Year Estimates C16001

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 approximately 0 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

All of County of Cheshire programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The County of Cheshire is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the County of Cheshire will strive to provide alternative but meaningfully accessibility. Moreover, the County of Cheshire continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in languages other than English upon request.

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) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The County of Cheshire has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

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:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers 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 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 or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the County of Cheshire service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether County of Cheshire's financial resources are sufficient to fund language assistance resources needed.
- Determine whether County of Cheshire has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning County of Cheshire's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to County of Cheshire staff:

- Information on the County of Cheshire Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

County of Cheshire shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with NHE-911 (for dispatch only), Language Bank, and Language Line Solutions Personal Interpreter Program for translation. NH Dpt. Of Education Translators, Language Marketplace, and Southern NH Area Health Education Center can be contacted to obtain an in-person translator. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 603-355-3031.

"I Speak" Language Identification Card

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 vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	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
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	Haitian Creol
	أنا أتحدث اللغة العربية	Arabic
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website

http://www.lep.gov/ISpeakCards2004.pdf

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have <u>transit-related</u>, 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.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
[Insert Name of						
Committee/Board]						

Note: insert the number of people and % of total board membership

B. Efforts to Encourage Minority Participation

No non-elected transit-related boards, committees, or councils.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

□ No, the agency does not have subrecipients.

 \boxtimes Yes. If yes, list the subrecipient names:

Home Healthcare, Hospice and Community Services Community Volunteer Transportation Company Keene Senior Center Southwest Regional Planning Committee

County of Cheshire monitors subrecipients using the following process:

1. <u>County of Cheshire uses the following process for ensuring all subrecipients are complying with the</u> general reporting requirements of FTA Circular 4702.1B:

The County reviews subrecipient financial, program and audit reports, reconciliation and close-out reports, whether claims and reports were submitted timely and accurately, etc. Subrecipient contracts include a detailed statement of work, established deadlines for reports and claims, the type of monitoring (onsite or desk), audit requirements, and penalties for non-compliance. Close monitoring is conducted to track the progress of the terms and conditions of the agreement, to ensure that the objectives of the grant are being met, to confirm that the program and fiscal reporting is being properly prepared and completed, to validate that documentation is being retained for possible review at a later point, and to monitor performance against benchmarks, timelines, goals, and outcomes.

2. <u>County of Cheshire collects Title VI programs from the subrecipients listed above and reviews programs</u> for compliance by:

The County collects and reviews subrecipient Title VI programs. 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. Has the agency built a facility? (check a response below)

☑ No, the agency has not built a facility.

□ Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

County of Cheshire:

 \Box is a fixed route transit provider

⊠ is <u>not</u> a fixed route transit provider

Section 13: Appendix – Language Assistance Plan