



Title VI Program

2017-2019

**42 Sumner Drive
Dover, NH 03820**

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COAST'S COMMITMENT TO CIVIL RIGHTS

This update of the Cooperative Alliance for Seacoast Transportation's (COAST) Title VI Program has been prepared to ensure that the level and quality of COAST's fixed route and demand response services are provided in a nondiscriminatory manner, and that the opportunity for full and fair participation is offered to COAST's riders and other community members. Additionally, through this program, COAST has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English.

While it is a matter of principle that COAST is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of any of COAST's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), COAST has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in COAST's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that the development benefiting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

COAST's Mission Statement

COAST champions and provides customer-focused public transportation with a commitment to excellent in safety and service.

COAST's Vision Statement

COAST is an innovative leader in providing a broad range of public transportation services, connecting and coordinating a robust network of transportation options for everyone.

I. INTRODUCTION

THE COOPERATIVE ALLIANCE FOR SEACOAST TRANSPORTATION

The Cooperative Alliance for Seacoast Transportation (COAST) certifies that transit operations overseen by COAST in the Greater Seacoast region of New Hampshire are operated in a manner which is in full compliance with existing regulations summarized in FTA Circular 4702.1B. COAST's policies regarding non-discrimination and respect for diversity ensure that all COAST services will be provided without regard to race, color, or national origin. COAST is designed to be fully accessible, open to the public, and intended to maximize access to transportation for all residents of, and visitors to, the COAST service area, including and especially individuals with disabilities, seniors and low-income residents.

To ensure this compliance, COAST will compile, maintain, and submit in a timely manner, the required documentation of quality and level of service as defined by Title VI information required by FTA Circular 4702.1B and the Department of Transportation's Title VI regulation, 49 CFR Part 21.9. Our adopted policies and our ongoing operations ensure that individuals may provide input and comment on our service.

COAST provides transit service in the Greater Seacoast region of New Hampshire. The population of COAST's service area is 161,013 based on the U.S. Census Bureau, 2011-2015 American Community Survey (ACS) 5-Year Estimates.

COAST is an independent public body of the State established under Revised Statutes Annotated (RSA) 239. RSA 239 designates how COAST's board members are to be determined, including the potential for representation by all communities served. COAST provides fixed-route bus service, complementary ADA Paratransit Service, express commuter service (The Clipper Connection) and is one of the lead agencies in efforts to develop region-wide coordinated transportation for senior citizens and persons with disabilities.

COAST operates a network of 10 fixed routes with its own employees and vehicles. Service is provided weekdays from 5:25 a.m. to 9:31 p.m. and on Saturdays from 6:40 a.m. to 9:47 p.m. Complementary ADA paratransit service is provided during comparable hours and days as the fixed route services and The Clipper Connection operates only during peak commuting hours, Monday-Friday.

COAST's fixed-route service has a base adult fare of \$1.50 on fixed routes and \$7.00 on The Clipper Connection. A half fare of \$0.75 or \$3.50 on fixed-routes is offered to persons with disabilities and Medicare cardholders during all hours of operation. ADA Paratransit base fares are double the equivalent fixed route base fare for a comparable trip. COAST operates from a maintenance and operation facility at 42 Sumner Drive and Administrative Offices at 6 Sumner Drive in the City of Dover, NH.

Service levels are generally higher in the Cities of Dover, Portsmouth, Rochester and Somersworth where the population densities are highest and traditional public transit users live and work. Service is also provided to many outlying rural towns that tend to be less densely populated and generally receive lower levels of service.

COAST fixed route and paratransit ridership has slowly declined over the last three fiscal years as small service reductions have had to be implemented. In FY 2014, COAST carried 489,408 passengers. Ridership decreased to 487,594 in FY 2015. COAST carried 477,729 passengers in FY 2016. Over the three years fixed-route ridership dropped by 2.4%, while overall demand response (DR) ridership fell by 11.1%. The termination of a long standing contractual relationship for DR service with an area health center was the primary cause for the decline in DR ridership.

This document and its attached Appendices are intended to comprise COAST's Title VI Program submittal.

II. OBJECTIVES

The Cooperative Alliance for Seacoast Transportation (COAST) has in place a Program based on Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d) and U.S. Department of Transportation Regulation 49 C.F.R. Part 21 “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation”. This Program is based on Federal Transit Administration Circular 4702.1B, “Title VI and Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, October 1, 2012. The objectives of the program are as follows:

- A. Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- B. Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- C. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Section 601 of Title VI of the Civil Rights Act of 1964 is the statutory authority for COAST’s Title VI Program and states:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Transit Administration (FTA) requires that all direct recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the recipient’s Board of Directors or appropriate governing entity. Additionally, COAST’s current Certifications and Assurances have been uploaded to TRAMS.

III. GENERAL REQUIREMENTS

As part of its Title VI Program, COAST maintains certain reporting requirements and provides the Federal Transit Administration (FTA) the following information regarding these reporting requirements.

A. Requirement to Notify Beneficiaries of Protection Under Title VI

COAST has established methods for notification to the public regarding its Title VI obligations, how to get more information regarding COAST's non-discrimination obligations, and procedures for filing a discrimination complaint against COAST. The Title VI Notice To The Public is included in Appendix A. The public notice is posted on COAST's website, on all COAST vehicles and in public areas at both our operations facility and our administrative facility. COAST's Public Notice is found at http://www.coastbus.org/title_vi.html.

B. Requirement to Develop Title VI Complaint Procedures and Complaint Form

COAST has developed procedures for investigating and tracking Title VI complaints that may be filed against COAST and for making these procedures available to members of the public upon request. Should COAST have any sub-recipients in the future, sub-recipients shall be required to have such procedures and shall be encouraged to adopt COAST's complaint investigation and tracking procedures. Both COAST's Title VI Complaint and Investigation Procedures and COAST's Title VI Complaint Form are posted on COAST's website at http://www.coastbus.org/title_vi.html.

A copy of COAST's Title VI Complaint and Investigation Procedures is included in Appendix B. COAST's Title VI Complaint Form is found in Appendix C. Complaints should be addressed to Title VI Coordinator, Cooperative Alliance for Seacoast Transportation, 42 Sumner Drive, Dover, NH 03820.

C. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits

In compliance with 49 C.F.R. § 21.9(b), COAST (and any sub-recipient) shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming COAST (or sub-recipient) alleging discrimination on the basis of race, color, or national origin. The list shall comprise all of the records of active complaints and lawsuits. The record will contain the date the Title VI investigation, complaint or lawsuit was filed; a summary of the allegation(s); the status of the investigation, complaint or lawsuit; and actions taken in response, or final findings related to the investigation, complaint or lawsuit. During the processing of active investigations, complaints or lawsuits, the Title VI Coordinator shall update the record form as necessary. COAST's Title VI Investigations, Complaints and Lawsuits List is found in Appendix D.

A Summary Form of each investigation, complaint or lawsuit will be completed giving more detail than is found in the list. Each Summary Form shall include the date the investigation, complaint or lawsuit was received by COAST; a more detailed summary of the allegation(s); actions taken by COAST in response to the investigation, complaint or lawsuit; and the date the complaint was

resolved or closed. The Summary Forms will be kept with the Title VI Investigations, Complaints and Lawsuits List. COAST's Title VI Investigation, Complaint or Lawsuit Summary Form is included in Appendix E.

As of the writing of this update to the Program COAST has never incurred any Title VI complaints or investigations, nor have any lawsuits of a Title VI nature or otherwise been filed against COAST.

D. Promoting Inclusive Public Participation

To date, COAST has used a number of strategies to solicit input from riders, organizations serving transit dependent populations in the region, and members of the public in planning and implementation of its regional transit service:

Alliance for Community Transportation (ACT): COAST staff and several board members, or their agency designee, participate actively in the Alliance for Community Transportation, one of ten such regional transportation coordinating councils established throughout New Hampshire based on the State of New Hampshire's 2006 State Transit Coordination Plan. ACT serves as a forum for information exchange and cooperative data gathering, assessment of regional community transportation needs, service planning and project prioritization. ACT's membership includes a range of non-profit and for-profit transportation providers, municipalities and other purchasers of transportation, and citizen representatives.

Meetings with Municipal Staff and Presentations to Communities: COAST staff and/or board members meet typically once a year (more frequently if requested) with municipal staff from COAST member communities including Community Development Directors, Town Managers, City Council Members and Human Service Directors. These meetings serve as opportunities to gather input on community need as well as to present operations data and funding requests.

Consultation with Regional Health & Human Service Agencies: As part of the most recent update to the region's Coordinated Public Transit/Human Services Transportation Plan, surveys were conducted of municipal Human Services Directors and non-profit Health & Human Service agencies working with transit dependent populations, including seniors, individuals with disabilities, and low income residents. Surveys asked about the transportation needs of community residents and agency clients.

Public Outreach Meetings/Events: COAST staff and/or board members have given numerous presentations and attended public events to promote the COAST system and solicit public input.

Rider Surveys: COAST conducts biennial surveys of all system riders with a series of questions rating customer service, the scheduling process, system on-time performance, overall satisfaction with COAST transit service and ease of understanding of the system.

Collaboration with Metropolitan Planning Organizations: COAST's service area spans the regions of two Metropolitan Planning Organizations (MPOs) – Strafford Regional Planning Commission and Rockingham Planning Commission. Both MPOs serve on the COAST Board of Directors and provide input on regional transit needs conveyed through their member communities' commissioners. COAST also benefits from public outreach activities conducted by the MPOs.

Press Releases & Public Hearings: COAST issues press releases on additions to service and holds public hearings upon changes to service and fare policy. Generally these hearings are held during COAST's operating hours to enable users of the system to attend the hearings via public transportation.

Opportunity for Public Comment at COAST Board Meetings: A period for public comment is included on the agenda of all of COAST's regular Board Meetings, typically held on the 4th Wednesday of the month at COAST's Administrative Offices at 6 Sumner Drive, Dover, NH 03820.

E. Requirement to Provide Meaningful Access to Persons with Limited English Proficiency (LEP)

COAST takes responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its public transit program for individuals who are Limited English Proficient. FTA's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005) defines LEP Persons as "*persons for which English is not their primary language and who have a limited ability to speak, understand, read or write English.*"

A description of COAST's efforts to provide meaningful access to LEP individuals begins on page 10.

F. Minority Representation on Planning and Advisory Bodies

Title 49 C.F.R. §21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." COAST has no active transit-related, non-elected planning boards, advisory councils or committees, or similar committees. Board membership is based on revised state statute effective July 1985 (N.H. RSA 239:3, I) and the subsequent Bylaws as approved by COAST's Board of Directors.

G. Providing Assistance to Subrecipients

COAST does not currently have any sub-recipients to which it extends Federal financial assistance. Should COAST develop such a pass-through relationship in the future it recognizes its obligation to assist the subrecipients in complying with U.S. DOT's Title VI regulations, including general reporting requirements.

H. Monitoring Subrecipients

As noted above, COAST does not have any sub-recipients to which it extends Federal financial assistance. Should COAST develop such a pass-through relationship in the future it recognizes its obligation to monitor subrecipients' compliance with U.S. DOT's Title VI regulations, including general reporting requirements.

I. Determination of Site or Location of Facilities

COAST has not built any facilities in the past three years. COAST will make all siting decisions after completing an equity analysis with regard to where facilities are sited to ensure the location is selected without regard to race, color, or national origin per Circular 4702.1B, Ch. III, Section 13.

J. Requirement to Provide Additional Information Upon Request

COAST will provide information other than that required by Circular 4702.1B to FTA upon request should it be necessary to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

IV. Determining the Need for Language Assistance

COAST is obligated to determine what reasonable steps to take to provide LEP individuals with meaningful access to its programs, activities and services. The following pages describe the four part analysis of LEP populations described in Circular 4702.1B. These steps include balancing the following four factors:

- (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program, or recipient;
- (2) the frequency with which LEP persons come in contact with the program;
- (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and
- (4) the resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

COAST has undertaken an analysis of the languages spoken in its eleven-community Greater Seacoast service area, and the estimated number of residents with Limited English Proficiency and their distribution by language group and census tract. A summary of this data is included in the following pages. Appendix F (COAST Title VI Analysis – Limited English Proficiency (LEP)) includes a comprehensive data table from the 2011-2015 American Community Survey regarding populations with Limited English Proficiency.

Table 1 on the following page shows data taken from the 2011-2015 American Community Survey data tables for LEP populations by language in the COAST Service Area.

Note that there are ongoing concerns regarding the use of American Community Survey (ACS) data for this purpose, but it represents the best data available on poverty and the ability to speak English.

The ACS data identifies 39 languages in addition to English spoken at home by residents of the COAST region. Speakers in each language group self-identify as speaking English “Very Well” or “Less than Very Well.”

The 2011-2015 ACS compilation estimates the New Hampshire population at 1,258,609 and the corresponding COAST service area population at 161,013. Of the total population in New Hampshire, 92.1% speak only English and in the COAST service area 93.2% of the population speaks only English.

In COAST’s service area the two largest LEP populations are those who speak Spanish or Spanish Creole, estimated at 554 LEP individuals or 0.34% of the region’s population and French (including Patois and Cajun), estimated at 391 LEP individuals or 0.24% of the region’s population.

Table 1

Limited English Proficiency (LEP) Numbers and Percentages for the COAST Region and New Hampshire for any Languages that over 300 people in the COAST region speak OR 3,000 people in New Hampshire speak

	COAST Region	New Hampshire
TOTAL POPULATION	161,013	1,258,609
SPEAK ONLY ENGLISH	149,999	1,159,579
English Only % of Total Population	93.2%	92.1%
Speak Spanish or Spanish Creole	2,105	26,293
LEP Spanish or Spanish Creole	554	9,310
LEP Spanish or Spanish Creole % of Total Population	0.34%	0.74%
Speak French (incl. Patois, Cajun)	2,694	21,848
LEP French (incl. Patois, Cajun)	391	4,231
LEP French (incl. Patois, Cajun) % of Total Population	0.24%	0.34%
Speak Other Pacific Island Languages	720	1,188
LEP Other Pacific Island Languages	307	483
LEP Other Pacific Island Languages % of Total Population	0.19%	0.04%
Speak Chinese	331	5,450
LEP Chinese	205	2,792
LEP Chinese % of Total Population	0.13%	0.2%
Speak Hindi	349	1,622
LEP Hindi	149	359
LEP Hindi % of Total Population	0.09%	0.03%
Speak Other Asian Languages	695	4,260
LEP Other Asian Languages	121	860
LEP Other Asian Languages % of Total Population	0.08%	0.07%
Speak Laotian	424	593
LEP Laotian	103	207
LEP Laotian % of Total Population	0.06%	0.02%
Speak Greek	377	2,342
LEP Greek	96	641
LEP Greek % of Total Population	0.06%	0.1%
Speak Other Indic Languages	100	3,452
LEP Other Indic Languages	50	1,440
LEP Other Indic Languages % of Total Population	0.03%	0.1%
Speak German	534	3,910
LEP German	39	334
LEP German % of Total Population	0.02%	0.03%
Speak Portuguese or Portuguese Creole	94	3,055
LEP Portuguese or Portuguese Creole	19	1,146
LEP Portuguese/Port. Creole % of Total Population	0.01%	0.1%
LEP % OF TOTAL POPULATION	1.26%	1.73%
Total LEP Population	2,034	21,803

Language Spoken At Home By Ability To Speak English For The Population 5 Years And Over
Data taken from the 2011-2015 American Community Survey 5-Year Estimates
For all Zip Codes served by COAST and for New Hampshire

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

There are six primary means by which an individual may come in contact with COAST.

- 1) COAST printed material – COAST has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- 2) COAST website – COAST has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- 3) Telephonically – COAST dispatchers, call center representatives and management are the primary staff responsible for answering calls related to COAST services. In consulting with these staff, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual they are able to quickly access Language Line® to assist in translation.
- 4) On-site visit – COAST Administrative staff has been the primary staff responsible for greeting individuals who visit the program on-site. In consulting with Administrative staff, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual they are able to quickly access Language Line® to assist in translation.
- 5) Riding on the vehicles – In consultation with COAST bus operators, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual they are able to quickly access Language Line® via the Dispatcher to assist in translation.
- 6) Public meeting or hearing – COAST has not participated in any public meetings or hearings at which communications with an LEP individual has presented a barrier in communication and access to the program.

In our 2016 biennial survey of passengers, 72% of passengers (or 451 individuals) indicated they were White/Caucasian. Of the remaining passengers who did not abstain from answering the question, 5% of passengers (or 33 individuals) indicated they were of Native American ethnicity, 4% of passengers (or 25 individuals) indicated they were of Asian ethnicity, 3% of passengers (or 21 individuals) indicated they were of African American ethnicity and 3% of passengers (21 individuals) indicated they were of Hispanic/Latino (2.2%) ethnicity. COAST had no instances in which a potential LEP individual requested additional assistance to complete the survey.

COAST's Bus Operators indicate that LEP passengers typically bring notes with their stops written on them, or schedules that have been marked up to indicate desired stops. In

addition, Bus Operators report that LEP passengers are riding with friends or family who assist LEP passengers with navigating the system.

From this data, and COAST's experience, the number or proportion of LEP individuals using the system is extremely limited and interactions are infrequent, which is consistent with the Census data analysis for the region.

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

In our 2016 biennial survey of passengers, 86% (or 526 individuals) indicated that our services were very or somewhat important to our passengers. COAST exists to assist transit-dependent individuals, residents, employers and employees, and visitors to the communities COAST serves improve access to medical care, employment, schooling, recreational and social events, and to meet other life needs. COAST recognizes the importance of access to transportation for all, and how critical that is to our overall success.

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

COAST has consulted with several regional agencies to identify common practices in New Hampshire for working with LEP populations, including the NH Department of Transportation, CART – the regional transit agency serving the Greater Derry-Salem area, the New Hampshire Transit Association (NHTA) members and numerous regional human service providers.

COAST's Language Assistance Program guides how we help individuals likely to utilize our services to access our services in light of their limited proficiency in English. COAST has secured the services of Language Line® to provide interpretation services for passengers and COAST customers needing language assistance. In addition, COAST is in the process of placing Language Identification Cards on all revenue vehicles so COAST staff can assist in connecting LEP individuals to the appropriate translation services. A Language Identification Poster is on display in our reception area and is brought to all public meetings. In addition, COAST maintains an updated Directory of Certified Interpreters in our region should we need translation services beyond what Language Line can provide.

The threshold for translating vital documents has been identified as 1,000 individuals or 5% of the population eligible to be served, whichever is less, falling within a specific LEP language group. The ACS 2011-2015 data used for this Title VI Program update shows no LEP population approaching the 5% threshold. Across all language groups in COAST's service area the LEP population totaled 1.26% in COAST's service area. The largest LEP population within a single language in COAST's service area is among speakers of Spanish or Spanish Creole with 554 LEP individuals, or approximately 0.34% of the total population.

Although COAST has not approached the threshold for translation of vital documents, COAST has identified the vital documents that should be readily available to prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations in our service area. COAST's Title VI Notice, Title VI

Complaint and Investigations Procedures and COAST's Title VI Complaint Form all indicate in both Spanish and French that the documents are available in those languages upon request. All three documents are currently translated in both Spanish and French so would be immediately available upon request.

In addition, COAST has identified additional strategies to assist Limited English Proficient Individuals likely to be users of our services in our region. Appendix G indicates COAST's additional strategies to assist Limited English Proficient individuals.

V. REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

A. Requirement to Set System-Wide Service Standards

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards, therefore, these only apply to COAST.

- 1) **Vehicle Load** – *Vehicle Load is the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point.* The standard for maximum vehicle load corresponds to the number of seats, wheelchair spaces and available capacity for standees per vehicle. At present, COAST's vehicle loads do not tend to approach capacity even at peak hours. COAST does allow vehicles to be loaded to capacity, including standees. Should the maximum capacity be reached, an additional vehicle will be assigned to the route at that time. The achievable capacities for COAST's vehicles are 44 passengers for a 29' Low Floor Bus, 55 passengers for a 35' Low Floor Bus, 81 passengers for a 40' Low Floor Bus and 55 passengers for a Coach Bus.

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
29' Low Floor Bus	27	17	44	1.6
35' Low Floor Bus	31	24	55	1.8
40' Low Floor Bus	39	42	81	2.1
Coach Bus	55	0	55	1

- 2) **Vehicle Headway** – *Vehicle Headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.* The standard for vehicle headways on the COAST system are dependent on the density of the area, for example, urban versus rural.

WEEKDAYS

Route 1 - Primarily Urban

	Peak	Base
Times	No additional service	5:30am - 7:30pm
Headway		60 minutes

Route 2 - Primarily Urban

	Peak	Base
Times	5:25am - 9:17am; 3:28pm - 7:02pm	9:17am - 3:28pm; 7:02pm - 9:31pm
Headway	30 minutes one direction. 60 minutes opposite direction	60 minutes

Route 6 - Mixed Urban/ Rural

	Peak	Base
Times	No additional service	5:50am - 2:04pm; 4:20pm - 6:34pm
Headway		60 - 120 minutes

Route 7 - Mixed Urban/ Rural

	Peak	Base
Times	No additional service	9:34am - 5:09pm
Headway		61 minutes

Route 33 - Mixed Urban/ Rural

	Peak	Base
Times	No additional service	6:25am - 10:36am; 1:05pm - 5:06pm
Headway		60 minutes

Route 40 - Primarily Urban

	Peak	Base
Times	6:18am - 9:35am	9:35am - 3:35pm; 6:48pm - 9:10pm
Headway	30 minutes	60 minutes

Route 41 - Primarily Urban

	Peak	Base
Times	6:00am - 10:49am; 3:40pm - 6:32pm	10:49am - 3:40pm
Headway	30 minutes	60 minutes

Route 100 - Mixed Urban/ Rural

	Peak
Times	5:50am - 6:45am; 3:40pm - 4:32pm
Headway	One run only

Route 101 - Primarily Urban

	Peak
Times	5:51am - 6:36am; 3:40pm - 4:40pm
Headway	One run only

Route 103 - Primarily Urban

	Peak
Times	5:48am - 6:25am; 3:40pm - 4:27pm
Headway	One run only

SATURDAY

Route 1 - Primarily Urban

	Peak	Base
Times	No additional service	6:40am - 7:30pm
Headway		60 minutes

Route 2 - Primarily Urban

	Peak	Base
Times	No additional service	6:47am - 9:47pm
Headway		60 - 120 minutes

Route 7 - Mixed Urban/ Rural

	Peak	Base
Times	No additional service	9:35am - 5:40pm
Headway		60 - 120 minutes

Route 40 - Primarily Urban

	Peak	Base
Times	No additional service	7:14am - 8:35pm
Headway		120 minutes

Route 41 - Primarily Urban

	Peak	Base
Times	No additional service	7:37am - 9:00pm
Headway		120 minutes

- 3) **On-Time Performance** – *On-Time Performance is a measure of runs completed as scheduled.* A vehicle is considered on time if it departs a scheduled time point no more than 0 minute early and no more than 5 minutes late. COAST’s goal is to achieve a 95% on-time performance standard.

- 4) **Service Availability** – *Service Availability is a general measure of the distribution of routes within an agency’s service area.* COAST specifically locates routes to maximize the potential for ridership (measured in terms of population and employment density). Bus stops are located along all routes at an average of one-quarter of a mile apart, except as otherwise infeasible due to safety or other constraints not under COAST’s control (e.g., limited access highway).

B. Requirement to Set System-Wide Service Policies

- 1) **Distribution of Transit Amenities** – Circular 4702.1B Chapter IV-4b(1) describes Transit Amenities as “*items of comfort, convenience, and safety*” that are available to the general riding public. Transit amenities include seating and bus shelters; provision of information such as printed signs, system maps, route maps, schedules and electronic signage; and escalators, elevators and waste receptacles. Transit amenities such as benches and shelters are distributed based on COAST’s Passenger Amenity Program. COAST will look at any request for additional amenities on a case-by-case basis.

COAST brochures are distributed widely throughout the region, and are available at town halls, senior centers, community centers, public libraries, housing authorities, medical facilities, human service agencies, shopping centers, chambers of commerce and other locations as requested.

COAST’s Passenger Amenity Program is found in Appendix H.

- 2) **Vehicle Assignments** – Except where a certain size vehicle could not negotiate a specific route, or there may be vehicle load constraints, any vehicle can be, and is, assigned to any route within the COAST system. Vehicles are assigned to routes first based on capacity and vehicle type requirements, and then are assigned randomly.

APPENDICES

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Appendix F	COAST's Title VI Analysis – Limited English Proficiency
Appendix G	COAST's Strategies to Assist LEP Individuals
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APPENDIX A

COAST'S TITLE VI NOTICE TO THE PUBLIC



TITLE VI NOTICE TO THE PUBLIC

The Cooperative Alliance for Seacoast Transportation (COAST) gives notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which COAST receives Federal financial assistance. To request a copy of COAST's Title VI Program contact COAST's Title VI Coordinator.

Any person who believes that he or she has, individually, or as a member of any group, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any COAST service, program or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint.

Complaints will be accepted in writing and may be filed with COAST's Title VI Coordinator at the address below. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Individuals may also file complaints directly with the U.S. Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) within the 180 day timeframe.

Complaints should include, at a minimum, the following information:

- Your name, address and a telephone number where you can be reached during business hours;
- A general description of the person(s) injured by the alleged discriminatory act(s);
- A description of the alleged discriminatory act(s) in sufficient detail to enable the Title VI Coordinator to understand what occurred, when it occurred, and the basis of the alleged discrimination (race, color or national origin);
- The letter must be signed and dated by the person filing the complaint or by someone authorized to do so on his or her behalf.

For a Title VI Complaint Form please visit www.coastbus.org. For more information regarding civil rights complaints, please contact:

COAST Title VI Coordinator
42 Sumner Drive
Dover, NH 03820
(603) 743-5777

Reviewed and Approved by the Board of Directors on 6/28/17

Este documento está disponible en español bajo petición.
Ce document est disponible en français sur demande.

APPENDIX B

COAST'S TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES



TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by the Cooperative Alliance for Seacoast Transportation (COAST).

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private council for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and COAST may be utilized for resolution.

Any person, group of people or entity that believes it has been subjected to discrimination prohibited under Title VI and related statutes may file a written complaint to the following address:

**Title VI Coordinator
Cooperative Alliance for Seacoast Transportation
42 Sumner Drive
Dover, NH 03820
Phone: 603-743-5777
Fax: 603-743-5786**

The following measures will be taken to resolve complaints filed under Title VI and related statutes:

- 1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her legal representative, and will include the Complainant's name, address and telephone number; the name of alleged discriminating official; the basis for the complaint (race, color, or national origin) and the date of the alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.
- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the COAST Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- 3) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant within ten (10) days by registered mail.
- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

- 5) Within 15 business days from the receipt of a complete complaint, COAST will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) business days of the decision to proceed with an investigation or not, the Executive Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - a. If the decision is made to not investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of COAST's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When COAST does not have sufficient jurisdiction, the Executive Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Executive Director or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- 8) The Executive Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with COAST's resolution of the complaint, he/she has the right to file a complaint with the:

**Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590**

APPENDIX C

COAST'S TITLE VI COMPLAINT FORM



TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Please provide the following information necessary in order to process your complaint. Should you require any assistance in completing this form, please let us know. Please complete this form and mail or deliver to:

Title VI Coordinator, COAST, 42 Sumner Drive, Dover, NH 03820
You can reach our office Monday-Friday from 8-5 at 603-743-5777

1. **Name** _____

2. **Street Address** _____

3. **City, State and Zip Code** _____

4. **Telephone Number** Home/Cell: _____ Work: _____

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

**If Yes please continue to question 7*

If No, please supply the name of the person for whom you are complaining and your relationship to him/her:

Name: _____ Relationship: _____

6. **Have you obtained permission to file on behalf of the complainant?** Yes No

7. **What was the alleged discrimination based on?** (Check all that apply)

Race

Color

National Origin

8. **Date of incident resulting in the alleged discrimination?** _____

Este documento está disponible en español bajo petición.

Ce document est disponible en français sur demande.

9. Please explain as clearly as possible what happened and why you believe you were discriminated against. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses.

If additional space is needed, please attach sheets of paper or use the back of this form.

10. Have you previously filed a Title VI complaint with this agency? Yes No

11. Have you filed this complaint with any other federal, state, or local agency; or with a federal or state court?

(Check the appropriate box) Yes No

If yes, please check each agency the complaint was filed with:

Federal agency Federal court State agency State court Local agency

12. Please provide the name of a contact person at the agency/court where the complaint was also filed:

Name _____

Address _____

City, State and Zip Code _____

Telephone Number _____

Please sign below. You may attach any written materials or information you believe supports your complaint.

Signature

Date

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

Title VI Coordinator
COAST
42 Sumner Drive
Dover, NH 03820

APPENDIX D

**COAST'S TITLE VI
INVESTIGATIONS, COMPLAINTS AND LAWSUITS
LIST**



TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS LIST

INVESTIGATIONS

Complainant	Date Filed	Summary	Status	Action(s) Taken

COMPLAINTS

Complainant	Date Filed	Summary	Status	Action(s) Taken

LAWSUITS

Complainant	Date Filed	Summary	Status	Action(s) Taken

APPENDIX E

**COAST'S TITLE VI
INVESTIGATION, COMPLAINT OR LAWSUIT
SUMMARY FORM**

Date: _____

Date complaint resolved or closed: _____

Date Complainant Notified of Resolution: _____

Signature: _____

Date: _____

APPENDIX F

**COAST'S TITLE VI ANALYSIS –
LIMITED ENGLISH PROFICIENCY**

COAST Title VI Analysis – Limited English Proficiency (LEP)
 LEP Populations by Municipality and Language Group
 Source: American Community Survey 2011-2015, 5-Year Estimates

Limited English Proficiency is defined by the Census Bureau as speaking English "less than very well"

Geography	COAST Region	New Hampshire	Berwick	Dover	Eliot	Exeter	Farmington	Kittery	Newington	Newmarket	Portsmouth	Rochester	Somersworth	S. Berwick	Stratham
Total Population	161,013	4,258,609	6,975	28,772	5,995	20,306	6,465	9,150	720	8,495	21,027	28,419	10,984	6,907	6,798
Speak Only English	149,999	4,159,579	6,702	26,265	5,771	19,549	6,258	8,934	677	7,487	18,871	27,107	9,304	6,678	6,396
English Only % of Total Population	93.2%	92.1%	96.1%	91.3%	96.3%	96.3%	96.8%	97.6%	94.0%	88.1%	89.7%	95.4%	84.7%	96.7%	94.1%
Speak Spanish or Spanish Creole	2,105	26,293	96	328	32	173	53	94	11	185	473	313	178	64	105
LEP Spanish or Spanish Creole	554	9,310	0	35	0	23	53	8	0	172	76	71	51	52	13
LEP Spanish/Creole % of Total Pop	0.34%	0.74%	0.0%	0.12%	0.0%	0.11%	0.82%	0.09%	0.0%	2.02%	0.36%	0.25%	0.46%	0.75%	0.19%
Speak French (including Patois/Cajun)	2,694	21,848	163	341	62	271	127	35	8	134	368	674	373	62	76
LEP French (including Patois/Cajun)	391	4,231	0	29	7	49	23	9	0	50	19	113	50	11	31
LEP French % of Total Pop	0.24%	0.34%	0.0%	0.10%	0.12%	0.24%	0.36%	0.10%	0.0%	0.59%	0.09%	0.40%	0.46%	0.16%	0.46%
Speak Other Pacific Island Languages	720	1,188	0	273	0	0	0	0	0	0	169	0	278	0	0
LEP Other Pacific Island Languages	307	483	0	155	0	0	0	0	0	0	44	0	108	0	0
LEP Other Pacific Island % of Total Pop	0.19%	0.04%	0.0%	0.54%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.21%	0.0%	0.38%	0.0%	0.0%
Speak Chinese	331	5,450	0	93	0	0	0	24	0	35	139	0	27	0	13
LEP Chinese	205	2,792	0	82	0	0	0	0	0	13	70	0	27	0	13
LEP Chinese % of Total Population	0.13%	0.22%	0.0%	0.28%	0.0%	0.0%	0.0%	0.0%	0.0%	0.15%	0.33%	0.0%	0.15%	0.0%	0.19%
Speak Hindi	349	1,622	0	13	0	0	0	0	0	0	49	0	287	0	0
LEP Hindi	149	359	0	5	0	0	0	0	0	0	37	0	107	0	0
LEP Hindi % of Total Population	0.09%	0.03%	0.0%	0.02%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.18%	0.0%	0.97%	0.0%	0.0%
Speak Other Asian Languages	695	4,260	0	405	0	0	0	0	0	0	107	43	115	0	25
LEP Other Asian Languages	121	860	0	12	0	0	0	0	0	0	35	32	42	0	0
LEP Other Asian % of Total Population	0.08%	0.07%	0.0%	0.04%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.16%	0.11%	0.38%	0.0%	0.0%
Speak Laotian	424	993	0	0	0	0	0	0	0	389	27	8	0	0	0
LEP Laotian	103	207	0	0	0	0	0	0	0	81	22	0	0	0	0
LEP Laotian % of Total Population	0.06%	0.02%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.95%	0.10%	0.0%	0.0%	0.0%	0.0%
Speak Greek	377	2,342	0	79	0	36	0	0	2	0	31	48	86	12	83
LEP Greek	96	641	0	24	0	16	0	0	0	0	29	9	15	3	0
LEP Greek % of Total Population	0.06%	0.05%	0.0%	0.08%	0.0%	0.08%	0.0%	0.0%	0.0%	0.0%	0.14%	0.03%	0.14%	0.04%	0.0%
Speak Other Indic Languages	100	3,452	0	50	0	0	0	0	0	0	50	0	0	0	0
LEP Other Indic Languages	50	1,440	0	0	0	0	0	0	0	0	50	0	0	0	0
LEP Other Indic Lang. % of Total Pop	0.03%	0.11%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.24%	0.0%	0.0%	0.0%	0.0%
Speak German	534	3,910	0	72	0	104	0	0	2	49	183	22	62	40	0
LEP German	39	334	0	0	0	0	0	0	0	0	28	0	11	0	0
LEP German % of Total Population	0.02%	0.03%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%	0.0%	0.10%	0.0%	0.0%
Speak Portuguese/Portuguese Creole	94	3,055	0	9	20	0	0	0	2	32	9	22	0	0	0
LEP Portuguese/Portuguese Creole	19	1,146	0	0	0	0	0	0	2	0	2	15	0	0	0
LEP Portuguese/ Creole % of Total Pop	0.01%	0.05%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.27%	0.0%	0.009%	0.05%	0.0%	0.0%	0.0%
TOTAL LEP POPULATION	2,034	21,803	0	342	7	88	76	17	0	316	382	225	400	66	57
LEP % OF TOTAL POPULATION	1.26%	1.75%	0.0%	1.19%	0.12%	0.43%	1.18%	0.19%	0.0%	3.72%	1.82%	0.79%	3.64%	0.95%	0.84%

APPENDIX G

**COAST'S STRATEGIES TO ASSIST
LEP INDIVIDUALS**



STRATEGIES TO ASSIST LEP INDIVIDUALS

TRANSLATION OF VITAL DOCUMENTS

Although there have been no requests from LEP individuals regarding translation of vital documents, COAST is prepared to provide translation of the following documents should they be requested.

- All consent and complaint forms
- All notices advising LEP individuals of free language assistance services
- All written notices of rights, responsibilities, denials, changes in benefits or services
- COAST's ADA Application and all subsequent determination letters
- COAST's ADA Service Guide
- COAST's Bus Schedules
- COAST's Employment Application
- COAST's Fare Guidelines
- COAST's Half Fare Program Application
- COAST's Passenger Guide
- COAST's Reasonable Modification Policy
- COAST's Title VI Notice and Complaint Process
- COAST's "How to Read Schedules"

COLLABORATION WITH COMMUNITY ORGANIZATIONS

COAST will be working with Dover Adult Learning Center going forward to collaborate on how to identify and reach potential LEP individuals to inform them of services available to them. Dover Adult Learning Center is the primary provider of English as a Second Language classes in the service area. It is hoped that through this collaboration additional community organizations with whom COAST can partner will be identified.

TRANSLATION/INTERPRETER SERVICES

COAST has partnered with Language Line® to provide translation services to any passengers or customers needing assistance with interpretation and/or translation.

APPENDIX H

COAST'S PASSENGER AMENITY PROGRAM



Passenger Amenity Program

The Cooperative Alliance for Seacoast Transportation (COAST) recognizes the importance of passenger amenities in providing comfortable and convenient service to system users as well as attracting new riders. This Passenger Amenity Program provides criteria for the placement of passenger shelters, benches, schedule holders, bicycle parking and bus stop signage. COAST will maintain an ongoing inventory of all passenger amenities.

Funding, municipal approval, municipal maintenance, actual ridership counts and operational characteristics at bus stops will be used in determining the appropriate amenity. Consideration is given to traffic patterns affecting vehicle operations and/or public safety and local ordinances or regulations governing the location and placement of amenities.



The following criteria will be used for consideration of amenity placement:

Bus Signage - Each bus stop is clearly marked with a bus stop sign displaying route information and route direction.

Benches – A bench may be provided at bus stops that have boarding counts of 10 or more passengers per day.

Shelters – A shelter may be provided at bus stops that have boarding counts of 15 or more passengers per day.

Schedule Holders – Bus stops that have a COAST shelter, or are major transfer points may be provided with a fixed display holder providing route and schedule information.

Bicycle Parking – A bicycle rack may be provided at bus stops that have a COAST shelter, are major transfer points or, will be utilized because the bus stop is located near a bicycle route.

In placing or relocating passenger amenities, the following will also be given consideration:

- Traffic patterns affecting vehicle operation and/or public safety.
- Improved COAST identification in municipalities.
- Local ordinances or regulations governing the location and placement of amenities.
- Locations having boarding counts of senior citizens and/or passengers with disabilities of 5 or more passengers per day.
- Locations near hospitals.

When replacing damaged amenities, the bus stop will be re-evaluated with current passenger boarding counts. If the bus stop no longer qualifies for the amenity, the damaged amenity will be removed and not replaced.

In order to utilize the criteria in placing amenities, certain operational and passenger data will be collected. This will include the necessity to count ridership at all bus stops and maintain this information on a continuing basis. This will allow ridership counts and operational characteristics at bus stops to be monitored to determine which stops warrant the respective amenity.

APPENDIX I

**BOARD OF DIRECTORS'
APPROVAL OF COAST'S 2017-2019 TITLE VI PROGRAM**



ACTION BY THE BOARD OF DIRECTORS

June 28, 2017

Board Members Present:

Donna Benton (City of Dover)
Scott Bogle (Rockingham Planning Commission)
Jennifer Decker (Secretary/Treasurer; Granite State Independent Living)
Steve Fournier (Town of Newmarket)
Colin Lentz (Strafford Regional Planning Commission)
Julian Long (City of Rochester)
David Sandmann (Vice Chair; At-Large Member)
Juliet T.H. Walker (Chair; City of Portsmouth)

Staff Present:

Rad Nichols (Executive Director)
Heather Hesse-Stromberg (Director of HR & Compliance)
Vanessa Polychronis (Community Liaison/HR Assistant)

On this date, the COAST Board of Directors reviewed COAST's Title VI Program 2017-2019 and voted unanimously to approve the Program as presented.

Respectfully submitted,

A handwritten signature in blue ink that reads "Heather Hesse-Stromberg".

Heather Hesse-Stromberg, Recording Secretary