



TITLE VI PROGRAM

2023-2026

**42 Sumner Drive
Dover, NH 03820**

Revised July 2024

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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 riders and other community members. Additionally, through this program, COAST has examined the need for services and materials for people whose primary language is not English 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 and urban renewal 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 has sought to engage the public in the development and update of this program. COAST engaged community organizations, riders, and staff to provide input.

This program been prepared using data from the 2021 American Community Survey 5-year Estimate, the most recent data available at the time of this document's adoption.

I. INTRODUCTION

THE COOPERATIVE ALLIANCE FOR SEACOAST TRANSPORTATION

The Cooperative Alliance for Seacoast Transportation (COAST) has provided transit service in the Greater Seacoast region of New Hampshire and Maine since 1982. The population of COAST's core service area is 130,276 based on the U.S. Census Bureau, 2021 American Community Survey (ACS) 5-Year Estimates. Additionally, COAST operates and supports services for seniors and individuals with disabilities in a greater region of New Hampshire known as Region 10 (the Alliance for Community Transportation's (ACT's) service area). The population of the combined COAST/ACT service area is 267,767.

COAST is an independent public body of the State established under Revised Statutes Annotated (RSA) 239. New Hampshire 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, other advance reservation demand response transportation services, and is one of the lead agencies in efforts to develop region-wide coordinated transportation for older adults and persons with disabilities.

COAST operates a network of 13 fixed routes with its own employees and vehicles. Service is provided weekdays and Saturdays from 5:30 a.m. to 10:31 p.m. COAST's fixed-route service has a base adult fare of \$1.50. A half fare of \$0.75 is offered to older adults, persons with disabilities, and Medicare cardholders during all hours of operation.

COAST operates complementary ADA paratransit service during comparable hours and days as the fixed route services. 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.

Finally, COAST operates advance reservation demand response services for Portsmouth, Exeter, Newmarket, and Stratham under agreement, as well as other eligibility-based services for older adults and individuals living with disabilities under an agreement with ACT.

Service levels are 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 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, older adults, and low-income residents.

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

II. TITLE VI PROGRAM REQUIREMENTS

1. Notice to the Public

To make COAST's riders and the public aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, our Title VI Notice, Program, Complaint Form and Complaint Process are on our website (coastbus.org), the Title VI Notice is posted in all COAST vehicles, information about COAST's commitment to civil rights is published in schedules and the Title VI Notice is posted in public areas at both our operations facility and our administrative facility. The Title VI Notice to The Public is included in Appendix A.

2. Procedures for Filing a Complaint

COAST has developed a process for riders and community members to file a complaint under Title VI. In addition, COAST has procedures in place for investigating and tracking Title VI complaints that may be filed against COAST. Any person, group of people, or entity who believes that they have been discriminated against on the basis of race, color, or national origin by COAST may file a Title VI complaint by completing and submitting COAST's Title VI Complaint Form available on our website or by request. COAST's lower-tier sub-recipients are 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 Complaint Form are posted on COAST's website at www.coastbus.org.

Members of the public who believe they have been the subject of discrimination can file a written and signed complaint up to 180 days of the date of the alleged discrimination. Complaints should identify a means by which the complainant can be contacted and should be addressed to:

Title VI Coordinator
Cooperative Alliance for Seacoast Transportation
42 Sumner Drive
Dover, NH 03820
Email: civilrights@coastbus.org

The Title VI Complaint Form asks for the following information:

- Individual contact information
- Date and location of incident
- Detailed description of the incident, the basis for alleging that discrimination has occurred, and identification of all involved parties
- Identification of any witnesses to the incident

All Title VI complaints must be signed and dated. Members of the public can access complaint forms and instructions on COAST's website (coastbus.org) or may request a hard copy of the form and instructions by contacting the Title VI Coordinator.

In the event a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Coordinator. Under the circumstances, the

complainant will be interviewed, and the Title VI Coordinator will assist the complainant in converting the verbal allegations to writing.

Procedures for Processing a Complaint

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (1994), and Executive Order 13166 “Improving Access to Services to Persons with Limited English Proficiency” (2000), for alleged discrimination in a program or activity administered by COAST.

When a complaint is received, the Title VI Coordinator will provide written acknowledgment of the receipt to the Complainant within ten (10) business days by Registered mail. If a complaint is deemed to be incomplete, additional information may be requested and the Complainant will have 60 business days to submit the requested information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within 15 business days of the receipt of a complete complaint, COAST will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant an investigation. Within five (5) business days of the decision to proceed, or not proceed, with an investigation, the Executive Director, or their authorized designee, will notify the Complainant and Respondent, by Registered mail, informing them of the disposition.

If the decision is made to not investigate the complaint, the notification shall specifically state the reason for the decision. 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. If COAST does not have sufficient jurisdiction, the Executive Director, or their authorized designee, will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.

If the complaint has investigative merit, the Executive Director, or their authorized designee, will assign an investigator and a complete investigation will be conducted. An investigative report will be submitted to the Executive Director within 60 days of the 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.

The Executive Director, or their authorized designee, will issue letters of findings to the Complainant and Respondent within 90 days of receipt of the complaint. If the Complainant is dissatisfied with COAST’s resolution of the complaint, they have the right to file a complaint with the FTA’s Office of Civil Rights.

As of the writing of this update to the Program, COAST has not incurred any Title VI complaints or investigations, nor have any lawsuits of a Title VI nature been filed against COAST.

A copy of COAST’s Title VI Complaint and Investigation Procedures is included in Appendix B and COAST’s Title VI Complaint Form is found in Appendix C.

3. Record of Title VI Investigations, Complaints or Lawsuits

COAST has had no Title VI Complaints, Investigations or Lawsuits during this reporting period.

4. Promoting Inclusive Public Participation

COAST's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in COAST's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence COAST's decision making;
- The concerns of all participants involved will be considered in the decision-making process;
- COAST will seek out and facilitate the involvement of those potentially affected.

Through an open public process, COAST has developed a public participation plan to encourage and guide public involvement efforts and enhance minority and Limited English Proficient (LEP) populations' access to COAST's decision-making process.

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. The COVID-19 pandemic impeded our ability to work as collaboratively with our partner agencies in the previous Program as we have in the past. COAST's efforts are beginning to reach pre-pandemic levels and are expected to increase as part of this Program.

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. The 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. When planning Public Outreach meetings, the goal is to schedule these meetings at times and locations that are convenient and accessible for minority and LEP communities. COAST utilizes a variety of media sources to publicize our meetings including social media, announcements on our website and collaborating with other organizations to ensure the public is aware of the opportunity.

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 and gathering demographic information including languages spoken at home.

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 meetings upon changes to service and fare policy. Generally, these meetings are held during COAST's operating hours to enable users of the system to attend the meetings 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 a location accessible by public transit. The locations of meetings are publicized well before the meeting in accordance with NH law.

Online Comment Form: COAST manages an online comment form on its website to allow members of the public to submit questions, comments, and complaints.

Email: COAST provides a specific email address (info@coastbus.org) to allow members of the public to submit questions, comments, and complaints.

5. LEP Four-Factor Analysis and COAST's Language Assistance Program (LAP)

Providing meaningful access to Limited English Proficient (LEP) Individuals

COAST is obligated to develop a LAP 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."*

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 individuals eligible to be served or likely to be encountered by the program, or recipient;
- (2) the frequency with which LEP individuals 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 41-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 2021 American Community Survey regarding populations with Limited English Proficiency.

Table 1 on the following page shows data taken from the 2021 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 12 language groups 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 2021 ACS compilation estimates the New Hampshire population at 1,308,666, the Maine population at 1,203,558, and the corresponding COAST/ACT service area population at 294,824. Of the total population in New Hampshire, 92.0% speak only English, in Maine that total is 94.1%, and in the COAST/ACT service area 94.7% of the population speaks only English.

Across COAST/ACT’s service area, LEP persons make up 1.3% of the total population. In COAST’s service area the two largest LEP populations are those who speak Chinese (including Mandarin and Cantonese) at 775 persons or 0.26% of the region’s population, and those who speak Spanish, estimated at 708 persons or 0.24% of the region’s population.

Table 1

U.S. Census American Community Survey, 2021 5-Year Estimates
Language Spoken at Home For the Population 5 Years and Over for the COAST/ACT Region

Label	Estimate	Percent of Total Population
Total Population	294,824	
Speak Only English	279,071	94.66%
Spanish:	3,404	
Speak English "very well"	2,696	
Speak English less than "very well"	708	0.24%
French, Haitian, or Cajun:	2,266	
Speak English "very well"	2,054	
Speak English less than "very well"	212	0.07%
German or other West Germanic languages:	1,190	
Speak English "very well"	1,111	
Speak English less than "very well"	79	0.03%
Russian, Polish, or other Slavic languages:	601	
Speak English "very well"	517	
Speak English less than "very well"	84	0.03%
Other Indo-European languages:	2,609	
Speak English "very well"	1,969	
Speak English less than "very well"	621	0.21%
Korean:	675	
Speak English "very well"	412	
Speak English less than "very well"	263	0.09%
Chinese (incl. Mandarin, Cantonese):	1,349	
Speak English "very well"	574	
Speak English less than "very well"	775	0.26%
Vietnamese:	372	
Speak English "very well"	416	
Speak English less than "very well"	226	0.08%
Tagalog (inc. Filipino):	396	
Speak English "very well"	375	
Speak English less than "very well"	21	0.01%
Other Asian and Pacific Island languages:	1,789	
Speak English "very well"	1,153	
Speak English less than "very well"	636	0.22%
Arabic:	340	
Speak English "very well"	200	
Speak English less than "very well"	140	0.05%
Other and unspecified languages:	621	
Speak English "very well"	554	
Speak English less than "very well"	67	0.02%

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

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

- 1) COAST printed material – COAST received one request in July of 2022 to have our ADA Application translated to Spanish. At the time COAST was transitioning to a Common Application to be used for ADA and other Community Transportation resources. NH Department of Health and Human Services Office of Healthy Equity assisted in translating the Common Application to Spanish. COAST has not received any other requests for service or accommodations from an individual for whom difficulty with English presented a barrier in communication and access to our programs.
- 2) COAST website – COAST received one request for some content on the website to be available in Spanish but, when directed to the Google Translate feature on the website, the individual making the request indicated that was sufficient and needed no further translation services.
- 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) Public meeting or hearing – COAST has not participated in any public meetings or hearings at which communication with an LEP individual has presented a barrier to communication or their access to the program.

COAST CUSTOMER SURVEY

COAST conducted a Customer Survey in April 2023 that asked for self-identification of race or ethnicity. COAST received 294 responses. A total of 88% (258 individuals) self-identified their Race and/or Ethnicity.

Race	Number of Respondents	Percent of Respondents
American Indian or Alaska Native	3	1%
Asian	9	3%
Black or African American	12	5%
Hawaiian or Other Pacific Islander	0	0%
White	213	83%
Two or More Races	14	5%
Hispanic or Latino	7	3%

Respondents were also asked to identify whether they speak a language other than English at home. A total of 91% (267) identified their language usage at home. Of those respondents, 82% (219) indicated that they do not speak a language other than English at home. Of the 18% (48) who indicated that they speak a language other than English at home, the largest group indicated that they speak Spanish at home (27% or 13 individuals). Of those who speak a language other than English at home, seven (7) or 15% indicated that they speak English “not very well.” COAST had no instances in which a potential LEP individual requested additional assistance to complete the survey.

COAST EMPLOYEE SURVEY

In March of 2023, staff who operate COAST vehicles were asked to participate in a survey regarding their interactions with customers with Limited English Proficiency. A total of 44 surveys were distributed and 29 were returned completed (65% response rate). Staff were asked if they can communicate in any languages other than English. Only six (6) employees speak a language other than English and 4 of the 6 indicated that they only speak “a little” of the language they identified.

Staff were asked how frequently they interact with a customer for whom language is a barrier. Their responses are captured below.

Frequency	Number of Responses	Percent of Total (44)
Never	1	3%
Rarely	20	69%
Weekly	4	14%
More Than Once a Week	4	14%
Daily	0	0%

Staff were also asked to identify specific routes where they encounter customers who struggle because English is not their primary language. Finally, staff were asked to identify the areas in which requests for assistance are received or in which assistance is needed. Staff frequently selected more than one area where assistance is needed.

Area	Number of Responses	Percent of Total (44)
COAST Bus Stops/Route	17	59%
COAST Services	5	17%
Fares/Passes/Transfers	8	28%
Directions	14	48%
Signage	1 (Audio Announcements)	3%
COAST Policies	0	0%

From this data, COAST’s experience, and the recent Customer Survey results, the number or proportion of LEP individuals using the system is limited and interactions are not frequent, 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 2023 survey of passengers, respondents were asked to indicate how important COAST is in meeting their transportation needs. A total of 92% (270 respondents) answered the question. The results show that 99.6% of our passengers identify COAST's services as being important in meeting their transportation needs with 87% (235 individuals) of them indicating that our services are very important and 12.6% (34 individuals) indicating that our services are somewhat important to them. Only one (1) respondent indicated that COAST is not at all important in meeting their transportation needs. COAST exists to assist transit-dependent individuals, residents, employers and employees, and visitors to the communities. COAST serves to 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 consulted with the Dover Adult Learning Center (DALC), the region's primary resource for persons wanting to learn English as a second language (ESL). DALC staff noted that the languages their students primarily speak are Spanish, Portuguese, Chinese and Indonesian languages. DALC has offered to assist with any translation needed and is eager to collaborate with COAST to help their ESL students learn how to use the bus system.

The threshold for translating vital documents has been identified as 1,000 persons or 5% of the population eligible to be served, whichever is less, falling within a specific LEP language group. The 2021 ACS data used for this Title VI Program update shows no LEP population approaching the 5% threshold. The largest LEP population within a single language in the COAST/ACT service area is among speakers of Chinese (including Mandarin and Cantonese) Spanish with 775 LEP persons, or approximately 0.26% of the COAST/ACT service area total population.

Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the following five elements:

1. Identifying LEP persons who need language assistance
2. Describing the language assistance measures provided
3. Describing how LEP persons are notified about the availability of language assistance
4. Describing how it monitors, evaluates, and updates the LAP, and
5. Describing how staff are trained.

The five elements are addressed below:

1. Identifying LEP individuals who need language assistance.

The 2021 ACS compilation estimates the New Hampshire population at 1,308,666, the Maine population at 1,203,558, and the corresponding COAST/ACT service area population at 294,824. Of the total population in New Hampshire, 92.0% speak only English, in Maine that total is 94.1%, and in the COAST/ACT service area 94.7% of the population speaks only English.

Across COAST/ACT's service area, LEP individuals make up 1.3% of the total population. In COAST's service area the two largest LEP populations are those who speak Chinese (including Mandarin and Cantonese) at 775 individuals or 0.26% of the region's population, and those who speak Spanish, estimated at 708 individuals or 0.24% of the region's population. COAST staff reported that interactions with LEP individuals is infrequent and that often person with limited English proficiency will have someone with them who helps them.

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 Spanish that the documents are available in Spanish upon request.

COAST may identify the language assistance need for an LEP group by:

1. Monitoring requests for language assistance
2. Utilizing Language Identification Cards at COAST facilities and public meetings.
3. Having Language Identification Cards on all COAST vehicles to assist operators in identifying the particular language assistance needs of customers.
4. Surveying direct service providers (Operators, Dispatchers and Supervisors, Call Center staff, Administrative Assistant, and Manager of Community and Employee Relations) on their experiences concerning contact with LEP individuals during the previous year.

2. Language Assistance Measures

COAST's Language Assistance Program guides how we help individuals likely to utilize our services to access our services considering 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 has placed Language Identification Cards on all revenue vehicles so COAST staff can assist in connecting LEP individuals to the appropriate translation services, including American Sign Language. 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.

COAST has not received any requests to translate vital documents but will respond to any requests received. To assist LEP persons in navigating our website, there is a link to Google Translate on COAST's home page that will translate the website into, currently, 133 other languages.

3. Providing Notice to LEP Individuals

COAST provides its Title VI Notice on its website, in COAST's lobby, in all COAST vehicles, and includes notice in all printed schedules. Language Identification Cards are placed wherever staff serve the public in person. COAST brings the Language Identification Cards to public meetings to help facilitate full participation.

4. Monitoring, Evaluating, and Updating the LAP

COAST's Title VI Coordinator will review the plan on an ongoing basis and will update the plan as required by the Triennial Title VI Program update. The following will be considered as part of the LAP's monitoring and evaluation:

- The number of LEP individual contacts encountered each year
- How the needs of LEP individuals have been addressed and identification of any unmet needs that can reasonably be met
- A determination of the current LEP population in the service area and whether the need for translation of vital documents has changed

COAST understands the value its services have for the individuals who rely on us, and the importance of taking measures to make use of the system easier for LEP individuals. COAST's strategies to assist Limited English Proficient Individuals likely to be users of our services in our region are found in Appendix G.

5. Training Staff

COAST has identified that the staff most likely to encounter LEP individuals are Operators, Dispatchers, Supervisors, Call Center staff, the Administrative Assistant, and the Manager of Community and Employee Relations.

Operators will be provided with training on how to utilize the Language Identification Cards to help customers indicate their primary language. Staff who provide direct customer service (Dispatchers, Supervisors, Call Center staff, Administrative Assistant, Manager of Community and Employee Relations) are trained on Title VI generally, the use of Language Identification Cards, how to document language assistance requests, and to direct potential Title VI/LEP complaints to the Title VI Coordinator.

6. 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.

7. Providing Assistance to Subrecipients

COAST has lower-tier sub-recipient relationships through the 5310 program we manage on behalf of ACT. Under those agreements COAST recognizes its obligation to assist the subrecipients in complying with U.S. DOT's Title VI regulations, including general reporting requirements. This includes providing the following information to lower-tier subrecipients:

- a. Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and the recipient's Title VI complaint form.
- b. Sample procedures for tracking and investigating Title VI complaints filed with a lower-tier subrecipient, and when COAST expects the lower-tier subrecipient to notify COAST of complaints received by the lower-tier subrecipient.
- c. Demographic information on the race and English proficiency of residents served by the lower-tier subrecipient. This information will assist the lower-tier subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
- d. Any other COAST-generated or obtained data, such as travel patterns, surveys, etc., that will assist lower-tier subrecipients in complying with Title VI.

COAST's lower-tier sub-recipients are required to comply with U.S. DOT's Title VI regulations, including general reporting requirements. In order to ensure the lower-tier subrecipients are in compliance with Title VI requirements, COAST undertakes the following monitoring activities:

- (1) Document its process for ensuring that all lower-tier subrecipients are complying with the general reporting requirements in Circular 4701.1B, as well as other requirements that apply to the lower-tier subrecipients based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
- (2) At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by COAST, COAST shall request that lower-tier subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis. Lower-tier subrecipients that are fixed route transit providers are responsible for reporting as outlined in Chapter IV of Circular 4702.1B.

8. 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.

III. 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, and 81 passengers for a 40’ Low Floor Bus. On cutaways, the capacity is 16 passengers.

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Cutaway	12	4	16	1.1
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

- 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.

Route Name/Service Type	Weekday Peak	Weekday Off Peak	Saturday	Base
Route 1: Primarily Urban*	Hourly	Hourly	Hourly	5:38am-7:25pm
Route 6: Mixed Urban/Rural*	Hourly	Hourly	N/A	5:30am-1:30pm 3:30pm-6:30pm
Route 12: Primarily Urban	Hourly	Hourly	Hourly	5:30am-10:00pm
Route 13: Primarily Urban	Hourly	Hourly	Hourly	5:55am-9:26pm
Route 14: Primarily Urban	Hourly	Hourly	Hourly	5:36am-10:31pm
Route 33: Mixed Urban/Rural*	Hourly	Hourly	Hourly	6:21am-7:57pm
Route 34: Mixed Urban/Rural**	Sporadic	Sporadic	Sporadic	5:43am-8:37pm
Route 40: Primarily Urban	Hourly	Hourly	Hourly	6:00am-7:47pm
Route 41: Primarily Urban	Hourly	Hourly	Hourly	6:00am-9:49pm
Route 42: Primarily Urban*	Hourly	Hourly	N/A	6:22am-6:35pm
Route 43: Primarily Urban	Hourly	Hourly	Hourly	6:18am-8:57pm
Route 44: Primarily Urban	Hourly	Hourly	N/A	6:21am-6:45pm
Route 100: Mixed Urban/Rural	Single run each direction/day.	N/A	N/A	5:50am-6:45am 3:40pm-4:32pm

Since June 2021, COAST has had to suspend some runs due to lack of drivers. As best as we could, these suspended services have been spread out across runs evenly. As we have been able to hire drivers, we have resumed services. Therefore, there are many iterations of our schedule during this time period where various levels of reduced service have been run. During this time, Routes 1, 33, 40, and 43 in particular have seen extended times of running

every two hours instead of every hour. There were several months where no Saturday service was operated at all, and then several months where it was reduced to service between 9:00am and 4:00pm.

* Routes 1, 6, 33, and 42 all have loops during the day when the run pauses so the driver can take a break or fuel the vehicle. These pauses break the hourly headway for that time only.

** Route 34 is operated by drivers going in or out of service, or between the yard at 42 Sumner Drive in Dover and the Dover Transportation Center for shift changes or breaks. Its runs are therefore based on when those exchanges are needed. While the route runs hourly at most, the exact hours it runs can change as the run cut changes over time. Some times of day it will run hourly for a few hours, or not at all for several hours.

- 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 92% 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 and largely based on past experience). 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. In most cases, COAST does not ultimately control whether physical amenities like a bench or shelter can be placed at specific locations. Those decisions must be approved by the NHDOT, a local municipality, or private landowner.

COAST brochures are available at COAST’s office and on COAST buses and are also provided to other locations as requested. COAST’s Passenger Amenity Program is found in Appendix H.

- 2) **Vehicle Assignments** – COAST routes have a variety of restraints on what types of vehicles can be used. Some routes are driven by non-CDL operators, and therefore can only be run in our non-CDL cutaways. Other routes have turns that are too tight for a 40’ bus and can only be operated by a 30’ or 35’ bus. Besides these restrictions, any vehicle in the appropriate class can be operated on any route. Vehicles are assigned to routes first based on capacity and vehicle type requirements, and then are assigned randomly.

APPENDICES

Appendix A	COAST's Title VI Notice to The Public
Appendix B	COAST's Title VI Complaint & Investigation Procedures
Appendix C	COAST's Title VI Complaint Form
Appendix D	COAST's Title VI Investigations, Complaints and Lawsuits List
Appendix E	COAST's Title VI Investigation, Complaint or Lawsuit Summary Form
Appendix F	COAST's Title VI Analysis – Limited English Proficiency
Appendix G	COAST's Strategies to Assist LEP Individuals
Appendix H	COAST's Passenger Amenity Program
Appendix I	COAST's Board Approval of 2023-2026 Title VI Program

APPENDIX A

COAST'S TITLE VI NOTICE TO THE PUBLIC



TITLE VI NOTICE TO THE PUBLIC

The Cooperative Alliance for Seacoast Transportation (COAST) is committed to providing non-discriminatory transportation services to all of its passengers and potential passengers. COAST operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964.

Any person who believes they have, individually, or as a member of any specific group, been subjected to discrimination on the basis of race, color or national origin may file a formal complaint with COAST. A written complaint must be filed within 180 days of the date of the alleged discrimination. All complaints should be signed, dated, and include contact information. Written complaints should be addressed to:

COAST Title VI Coordinator
42 Sumner Drive
Dover, NH 03820
civilrights@coastbus.org

For a Title VI Complaint Form please visit www.coastbus.org/about-coast/civil-rights.

For more information about COAST's civil rights programs and the procedures to file a complaint, visit [coastbus.org/about-coast/civil rights](http://coastbus.org/about-coast/civil-rights) or email civilrights@coastbus.org.

If information is needed in another language, or an individual is unable or incapable of filing a complaint and needs assistance, please contact COAST's Title VI Coordinator at 603-743-5777 or by email at civilrights@coastbus.org.

A complaint may be filed directly with the

Federal Transit Administration, Office of Civil Rights
Attention: Complaint Team,
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Approved by the Board of Directors: April 23, 2023

Revised Title VI Program Approved by the Board of Directors: August 28, 2024

Este documento está disponible en español bajo petición.

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 counsel 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: 603-516-0592
civilrights@coastbus.org**

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 have 60 business days to submit the requested 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 of 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 of 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. _____

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, mail or email this form to:

Title VI Coordinator
COAST
42 Sumner Drive
Dover, NH 03820
civilrights@coastbus.org

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**



TITLE VI INVESTIGATION, COMPLAINT OR LAWSUIT SUMMARY FORM

Complainant: _____

Basis for Complaint: _____

Date Title VI complaint received by COAST: _____

SUMMARY OF COMPLAINT ALLEGATION(S):

ACTION(S) TAKEN BY COAST:

Date: _____

Date: _____

Date: _____

Date: _____

Date: _____

Date: _____

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)

U.S. Census - 2021 American Community Survey 5-Year Estimates: Language Spoken at Home for the Population 5 Years and Over

	New Hampshire	Maine	Epping 03042	Fremont 03044	Northwood 03261	Nottingham 03290	Portsmouth 03801	Dover 03820	Nadbury 03823	Durham 03824	Barrington 03825	E. Kingston & S. Hampton 03827	Walesfield 03830	Exeter, Bwood, Kensington 03833	Farmington 03835	Greenland 03840	Hampton 03842	Hampton Falls 03844	Kingston 03848	Milton 03851	Milton Mills 03852	New Castle 03854	New Durham 03855	Newfields 03856	Newmarket 03857	Newton 03858
Total:	1,308,666	1,293,114	6,657	4,420	4,322	4,703	22,117	30,709	2,061	15,160	8,727	3,104	1,285	21,461	6,298	3,874	15,617	2,262	6,071	3,890	370	779	2,515	1,973	8,991	4619
Speak only English	1,203,558	1,216,827	6,492	4,315	4,207	4,472	19,997	28,362	1,908	14,099	8,580	3,067	1,264	20,119	6,124	3,600	14,933	2,040	5,893	3,786	370	753	2,498	1,932	8,446	4493
Percent of Total Population	92.0%	94.1%	97.5%	97.6%	97.3%	95.1%	90.4%	92.4%	92.6%	93.0%	98.3%	98.8%	98.4%	93.7%	97.2%	92.9%	95.6%	90.2%	97.1%	97.3%	100.0%	96.7%	99.3%	97.9%	93.9%	97.3%
Spanish:	32,455	11,920	53	0	18	46	339	376	9	209	0	9	21	286	28	82	240	6	42	1	0	0	0	21	183	0
Speak English less than "very well	10,862	2,712	46	0	0	12	94	139	3	18	0	0	0	52	0	31	53	0	0	0	0	0	0	0	40	0
LEP Percent of Total Population	0.8%	0.2%	0.7%	0.0%	0.0%	0.3%	0.4%	0.5%	0.1%	0.1%	0.0%	0.0%	0.0%	0.2%	0.0%	0.8%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%
French, Haitian, or Cajun:	17,352	33,695	21	14	9	7	184	449	2	45	5	11	0	76	49	47	110	7	26	16	0	10	5	12	77	39
Speak English less than "very well	3,390	6,435	0	8	0	0	9	33	0	0	5	4	0	0	0	8	14	0	0	0	0	0	0	3	0	0
LEP Percent of Total Population	0.3%	0.5%	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%
German or other West Germanic languages:	4,174	4,185	10	0	32	112	61	107	9	136	0	8	0	141	22	14	125	178	0	0	0	0	0	3	21	19
Speak English less than "very well	491	490	0	0	0	2	0	40	0	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Russian, Polish, or other Slavic languages:	5,159	2,801	0	32	0	16	174	58	0	64	47	0	0	46	0	0	12	28	22	0	0	0	6	0	0	8
Speak English less than "very well	1,664	504	0	0	0	0	25	0	0	16	0	0	0	0	0	0	0	11	0	0	0	0	6	0	0	0
LEP Percent of Total Population	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%
Other Indo-European languages:	19,870	6,209	27	28	0	19	738	501	61	197	0	4	0	260	0	15	79	0	0	0	0	16	0	0	58	60
Speak English less than "very well	5,633	1,562	0	7	0	0	104	227	0	28	0	0	0	24	0	0	2	0	0	0	0	6	0	0	0	0
LEP Percent of Total Population	0.4%	0.1%	0.0%	0.2%	0.0%	0.0%	0.5%	0.7%	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%
Korean:	1,468	643	0	0	0	0	135	55	0	28	0	0	0	216	0	1	28	0	0	0	0	0	0	0	13	0
Speak English less than "very well	704	192	0	0	0	0	16	55	0	13	0	0	0	90	0	1	16	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%	0.0%	0.1%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Chinese (incl. Mandarin, Cantonese):	5,531	3,102	0	21	25	17	148	28	23	201	0	0	0	69	0	31	6	0	0	18	0	0	0	2	5	0
Speak English less than "very well	2,429	1,371	0	21	25	17	1	13	15	106	0	0	0	61	0	0	6	0	0	0	0	0	0	2	5	0
LEP Percent of Total Population	0.2%	0.1%	0.0%	0.5%	0.6%	0.4%	0.0%	0.0%	0.7%	0.7%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%
Vietnamese:	2,216	832	0	0	0	0	17	213	0	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Speak English less than "very well	1,311	529	0	0	0	0	1	115	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tagalog (incl. Filipino):	1,673	1,026	54	10	0	14	51	7	1	0	0	5	0	165	0	0	32	0	0	0	0	0	0	0	0	0
Speak English less than "very well	300	255	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Asian and Pacific Island languages:	7,687	3,026	0	0	24	0	134	457	21	115	34	0	0	42	0	8	9	0	32	0	0	0	0	0	178	0
Speak English less than "very well	2,307	1,150	0	0	0	0	65	181	0	7	0	0	0	3	0	0	0	0	0	0	0	0	0	0	83	0
LEP Percent of Total Population	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.3%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%
Arabic:	2,807	1,438	0	0	0	0	38	15	27	8	0	0	0	1	0	0	2	0	56	0	0	0	0	0	0	0
Speak English less than "very well	1,149	536	0	0	0	0	5	8	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other and unspecified languages:	4,716	7,410	0	0	7	0	101	81	0	26	61	0	0	40	75	76	41	3	0	69	0	0	6	3	10	0
Speak English less than "very well	1,166	2,405	0	0	0	0	0	0	0	0	0	0	0	0	0	27	18	0	0	0	0	0	0	0	0	0
LEP Percent of Total Population	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

COAST TITLE VI Analysis - LIMITED ENGLISH PROFICIENCY (LEP)

U.S. Census - 2021 American Community Survey 5-Year Estimates: Language Spoken at Home for the Population 5 Years and Over

	Lee 03861	North Hampton 03862	Rochester (03867, 68, 39)	Rochester 03867	Gonic 03839	E. Rochester 03868	Rollinsford 03869	Rye 03870	Brookfield 03872	Seabrook 03874	Somersworth 03878	Stratford 03884	Stratham 03885	Middleton 03887	Berwick, ME 03901	Eliot, ME 03903	Kittery, ME 03904	South Berwick, ME 03908	COAST/ACT SERVICE AREA	COAST CORE SERVICE AREA
Total:	4,371	4,464	30,928	21,314	3,697	5,917	2,356	4,923	3,984	8,413	11,750	4,060	7,276	1,840	7,391	6,339	7,673	7,071	294,824	130,276
Speak only English	3,901	3,965	29,534	20,334	3,591	5,609	2,253	4,719	3,881	8,124	10,957	4,044	6,699	1,784	7,257	6,097	7,293	6,813	279,071	122,914
Percent of Total Population	89.2%	88.8%	95.5%	95.4%	97.1%	94.8%	95.6%	95.9%	97.4%	96.6%	93.3%	99.6%	92.1%	97.0%	98.2%	96.2%	95.0%	96.4%	94.7%	94.3%
Spanish:	45	300	471	421	36	14	24	69	6	0	91	8	84	29	11	94	128	75	3,404	1,613
Speak English less than "very well"	1	13	99	99	0	0	10	12	6	0	12	0	0	25	0	19	3	20	708	386
LEP Percent of Total Population	0.0%	0.3%	0.3%	0.5%	0.0%	0.0%	0.4%	0.2%	0.2%	0.0%	0.1%	0.0%	0.0%	1.4%	0.0%	0.3%	0.0%	0.3%	0.2%	0.3%
French, Haitian, or Cajun:	44	29	272	256	16	0	79	11	88	92	72	0	21	13	48	93	80	142	2,266	1,389
Speak English less than "very well"	0	0	0	0	0	0	5	0	0	0	0	0	21	0	8	32	45	17	212	144
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.1%	0.5%	0.6%	0.2%	0.1%	0.1%
German or other West Germanic languages:	0	0	29	29	0	0	0	28	9	0	31	0	62	4	16	23	9	0	1,190	298
Speak English less than "very well"	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	79	40
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Russian, Polish, or other Slavic languages:	0	0	0	0	0	0	0	14	0	25	0	0	0	0	23	0	19	15	601	289
Speak English less than "very well"	0	0	0	0	0	0	0	14	0	12	0	0	0	0	0	0	0	0	84	25
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Indo-European languages:	69	44	150	21	0	129	0	67	0	144	16	0	0	0	8	5	103	0	2,609	1,521
Speak English less than "very well"	18	0	106	0	0	106	0	0	0	96	0	0	0	0	0	3	0	0	621	440
LEP Percent of Total Population	0.4%	0.0%	0.3%	0.0%	0.0%	1.8%	0.0%	0.0%	0.0%	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.3%
Korean:	63	0	83	56	27	0	0	0	0	0	0	0	0	0	0	26	27	0	675	326
Speak English less than "very well"	0	0	72	56	16	0	0	0	0	0	0	0	0	0	0	0	0	0	263	143
LEP Percent of Total Population	0.0%	0.0%	0.2%	0.3%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%
Chinese (incl. Mandarin, Cantonese):	249	81	167	167	0	0	0	0	0	0	24	1	219	0	14	0	0	0	1,349	381
Speak English less than "very well"	180	28	167	167	0	0	0	0	0	0	24	0	90	0	14	0	0	0	775	219
LEP Percent of Total Population	4.1%	0.6%	0.5%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	1.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.3%	0.2%
Vietnamese:	0	0	0	0	0	0	0	0	0	0	109	0	0	0	0	1	0	0	372	340
Speak English less than "very well"	0	0	0	0	0	0	0	0	0	0	109	0	0	0	0	1	0	0	226	226
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%
Tagalog (incl. Filipino):	0	23	0	0	0	0	0	0	0	0	11	0	13	10	0	0	0	0	396	69
Speak English less than "very well"	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0	21	0
LEP Percent of Total Population	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Asian and Pacific Island languages:	0	22	175	4	27	144	0	0	0	6	309	7	178	0	14	0	13	11	1,789	1,100
Speak English less than "very well"	0	22	114	4	27	83	0	0	0	6	123	7	0	0	14	0	0	11	636	508
LEP Percent of Total Population	0.0%	0.5%	0.4%	0.0%	0.7%	1.4%	0.0%	0.0%	0.0%	0.1%	1.0%	0.2%	0.0%	0.0%	0.2%	0.0%	0.0%	0.2%	0.2%	0.4%
Arabic:	0	0	26	26	0	0	0	15	0	22	130	0	0	0	0	0	0	0	340	209
Speak English less than "very well"	0	0	26	26	0	0	0	0	0	22	76	0	0	0	0	0	0	0	140	115
LEP Percent of Total Population	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%
Other and unspecified languages:	0	0	21	0	0	21	0	0	0	0	0	0	0	0	0	0	1	0	621	279
Speak English less than "very well"	0	0	21	0	0	21	0	0	0	0	0	0	0	0	0	0	1	0	67	22
LEP Percent of Total Population	0.0%	0.0%	0.1%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

APPENDIX G

COAST'S STRATEGIES TO ASSIST LEP INDIVIDUALS



STRATEGIES TO ASSIST LEP INDIVIDUALS

TRANSLATION OF VITAL DOCUMENTS

COAST has received one request to translate its ADA Application which was translated to Spanish as requested. 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
- Common 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 Rider Guide
- COAST's Reasonable Modification Policy
- COAST's Title VI Notice and Complaint Process

COLLABORATION WITH COMMUNITY ORGANIZATIONS

COAST collaborates with Dover Adult Learning Center 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, including those needing American Sign Language interpretation.

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+ passengers per day.

Shelters – A shelter may be provided at bus stops that have boarding counts of 15+ 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 considered:

- 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+ 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 2023-2026 TITLE VI PROGRAM
REVISED**



**Cooperative Alliance for Seacoast Transportation
Minutes of the Meeting of the Board of Directors
Wednesday, April 26, 2023**

Present: Scott Bogle, Fred Butler (virtual), Mark Davies, Sönke Dornblut (virtual), Ben Fletcher (virtual), Robert Gibson, Lauren Haley (virtual), Denis Hebert, Margaret Joyce, David Sandmann (virtual), Dennis Shanahan, Nick Taylor, Kay Wright

Absent: Kendra Amaral, Michael Mates, Kristin Murphy, Thomas Wright Staff: Rad Nichols, Margot Doering, Heather Hesse-Stromberg

Action Item #1: 2023-2026 Title VI Program Update

COAST's Title VI Program Update was provided to the Board for review prior to the meeting. Ms. Hesse-Stromberg reviewed the requirements of a Title VI Program and provided an overview of the findings of the LEP analysis which noted that no populations rise to the level of requiring that vital documents be made available in other languages. Ms. Hesse-Stromberg noted that, though not required, COAST will respond to any request for translation of vital documents to the best of its ability.

The primary data sources used for the update is the 2021 U.S. Census Bureau's 5-Year Estimates for Language Spoken at Home for the Population 5 years and Over, the 2023 COAST Customer Survey and 2023 Employee Survey.

Action Recommended: That the Board of Directors approve the 2023-2026 Title VI Program update.

Mr. Sandmann made a motion to approve the 2023-2026 Title VI Program as presented and Mr. Bogle seconded the motion.

Mr. Shanahan took the vote by roll call. Note: As the NHDOT's representative, Mr. Butler is a non-voting member of the Board of Directors.

Mr. Bogle YES
Mr. Davies YES
Mr. Dornblut YES
Mr. Fletcher YES
Mr. Gibson YES
Ms. Haley YES
Mr. Hebert YES
Ms. Joyce YES
Mr. Sandmann YES
Mr. Shanahan YES
Mr. Taylor YES
Ms. Wright YES

The motion passed unanimously.

Respectfully submitted by Margaret Joyce, Board Secretary