

**Manchester Transit Authority
Title VI Program Plan
Commission Approval: August 26, 2025**

I. OBJECTIVES

The Manchester Transit Authority has in place a Program based on Title VI of the Civil Rights Act of 1964 (42 U.S.C Section 2000d) and U.S.D.O.T. Regulation 49 CFR Part 21 “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation”. The Program is based on Federal Transit Administration Circular FTA C 4702.1B, “Title VI and Guidelines for Federal Transit Administration Recipients”, October 1, 2012.

The objectives of the program are as follows:

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

II. GENERAL REQUIREMENTS

As part of the Manchester Transit Authority's Title VI Program, the transit system maintains certain reporting requirements and provides the Federal Transit Administration the following information regarding these reporting requirements.

A. Requirement to Provide an Annual Title VI Certification and Assurance

MTA shall submit its annual Title VI Assurance as part of its Annual Certifications and Assurances submission to FTA. While MTA does not currently have any sub-recipients, should sub-recipients exist in the future, MTA shall collect Title VI Assurances from sub-recipients prior to passing through FTA funds.

MTA has executed FY 2025 Certifications and Assurances to the FTA.

B. Requirement to Notify Beneficiaries of Protection under Title VI

The MTA has established methods for notification to the public regarding its Title VI obligations, how to get more information regarding MTA's non-discrimination obligations, and procedures for filing a discrimination complaint against the MTA. The public notice is included in Appendix A1 as well as Spanish translation in A2.

The public notice is placed on MTA's website and all Revenue vehicles in English and Spanish language versions. The MTA website is compatible with Google Translate so that the notice may be translated into dozens of languages beyond those required under the Safe Harbor thresholds which for MTA, is only Spanish.

MTA also publishes the notice in local print every three (3) years with the last date of publish being September 12, 2022 in the Union Leader, the most widely circulated newspaper in our area. The next printing will be in September 2025.

C. Requirement to Develop Title VI Complaint Procedures

MTA has developed procedures for investigating and tracking Title VI complaints that may be filed against the MTA and for making these procedures available to members of the public upon request. Should MTA have any sub-recipients in the future, sub-recipients shall be required to have such procedures and shall be encouraged to adopt MTA's complaint investigation and tracking procedures.

A copy of the MTA's Title VI Complaint and Investigation Procedures is included in Appendix B. The Title VI complaint procedures were adopted by the MTA Board of Commissioners, MTA's policy board, on August 27, 2013. The MTA Title VI Coordinator is the Assistant Director: Transit Operations, Manchester Transit Authority, 110 Elm Street, Manchester, NH 03101. A copy of the MTA Title VI Complaint Form is included in Appendix C.

D. Requirement to Record Title VI Investigations, Complaints and Lawsuits

In compliance with 49 CFR Section 21.9(b), the MTA (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 the MTA (or sub-recipient) alleging discrimination on the basis of race, color, or national origin. This list shall include the date the investigation, lawsuit, or complaint was filed and received by MTA, a summary of the allegation(s), the status of the investigation, lawsuit or complaint, and actions taken by the MTA (or sub-recipient) in response to the investigation, lawsuit, or complaint.

MTA's form for recording this information is included in Appendix D. The list shall comprise all of the records of active investigations, lawsuits, and complaints recorded on these forms. During the processing of active investigations, lawsuits, or complaints, the Title VI Coordinator shall update the record form as necessary. Upon resolution and closure of an investigation, lawsuit or complaint, the Title VI Coordinator shall record such closure on this form.

During the most recent reporting period, there were no Title VI complaints, investigations, or lawsuits filed against the MTA.

E. Requirement to List Membership on Non-elected Board and Committees Depicting Racial Breakdown of the Membership and Description of Efforts Made to Encourage the Participation of Minorities on Such Committees.

MTA has no such committees, boards, or councils at the present time. Should MTA seek to establish such a body, action will be taken to ensure active participation by minorities throughout the process.

F. Requirement to Develop a Public Participation Plan

MTA has developed a Public Participation Plan which is included as Appendix E. This Plan was developed during the late summer and early fall of 2016 before being approved by the MTA Commission on September 27, 2016. As a result, MTA has not yet had a qualifying service/fare change be considered that would trigger the Plan. The most recent service change proposal occurred in 2015 at which time MTA was considering eliminating service to a shopping plaza located in a low income neighborhood. As a direct result of the public participation process and comments received, MTA changed our plan and kept service to that plaza in place. It continues to operate today. The PPP included in this plan should build upon that success to make it even easier for stakeholders to share comments/concerns with MTA so that we ensure equal access to all residents and that MTA is doing everything possible to meet the transportation needs of our community.

G. Requirement to Develop a Language Assistance Plan (LAP)

MTA has developed a Language Assistance Plan (LAP) in order to ensure meaningful access to programs and activities for individuals with Limited English Proficiency (LEP). To develop this Plan, a four factor analysis was performed to determine specific language services that are appropriate. This analysis helps MTA to determine if it communicates effectively with LEP persons and informs language access planning.

Factor 1: Number of LEP Persons in Service Region

MTA begins by developing an understanding of the proportion of LEP persons who may encounter our services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, MTA evaluated the level of English literacy and to what degree people in our service area speak a language other than English and what those languages are. Data for this review is from the United States Census “American Fact Finder” website. The most recent American Community Survey (ACS) 5 year estimates were used (2016-2020).

Attachment F is a table showing the results for our service area. In order to ensure the highest level of inclusion, MTA determines Safe Harbor thresholds based on the estimate of LEP populations for the entire MTA service area, including the recently added CART service area. If this combined figure is 1,000 or more people (since the population of our service area is greater than 100,000- any levels below 1,000 people are automatically below the 5% alternative threshold) that population is included in the LEP plan.

As Attachment F illustrates, the highest population speaking English less than very well is Spanish. The estimate is 3,579 so Spanish is included in our LEP plan and all vital documents and postings are translated into Spanish. The next highest population is French. The estimate of 1,230 so French is included in our LEP plan and all vital documents and postings are translated into French. The next highest language is Vietnamese with an estimate of 832. This does not meet the threshold for LEP. All other languages represent even smaller volumes of population.

It should be noted that while only Spanish and French meet the Safe Harbor threshold, MTA has taken steps to make materials available on our website through Google translate into dozens of languages, including Russian. Later sections of this Plan dealing with tablets and translation services are also available to more languages than just Spanish and French in an effort to meet more than the minimum standards of LEP.

Factor 2: Frequency of LEP Use

There are a number of places where MTA riders and members of the LEP population can come into contact with MTA services including the use of the fixed route system, paratransit, customer service calls, reservations for paratransit, dispatch questions/lost and found, fare media purchases, and MTA outreach materials. An important part of the development of MTA's LAP is the assessment of major points of contact. These include:

- Communication with MTA customer service staff
- Fare media sales
- Printed outreach materials
- Online materials
- Public meetings/hearings
- Paratransit and demand response reservations
- On board service postings
- Social media outreach

As part of MTA's 2016 Triennial Review, it was noted that MTA needed to better understand the four factor analysis with regard to barriers to our service. To that end, MTA contacted the Public Health Department and asked that they host a meeting of area agencies that work with LEP populations so that MTA could gain a better sense of any restrictions to our service they were facing. The meeting was held in September and in attendance were a variety of agencies including:

- Manchester Community College
- Catholic Medical Center
- Southern New Hampshire University
- Manchester Community Health Center
- Dartmouth Hitchcock
- Project LAUNCH
- Meals on Wheels
- Easter Seals
- Child and Family Services

The meeting was very helpful as it provided valuable insight into three main points of interest. First, the consensus was that age played a large role in determining if language was a barrier. Many agencies

reported that younger individuals were much more likely to use online tools to access information and this in turn reduced the need for translated printed materials. Older individuals however were more likely to want translated documents in paper format. MTA has identified a list of vital documents as a result and all of these have been translated into Spanish and are available through MTA or at many of these partner agencies. It was noted that the MTA website translation tool was very helpful and MTA committed to continuing to ensure the website had the most up to date information for ease of access to translation. The second point was that most agencies believed their LEP populations did not frequently use public transit but not because of a language barrier but rather due to the hours of service. MTA operates hourly frequencies and the last trips are at 5:30 PM. Many agencies reported LEP workers employed in service sector jobs that weren't out in time to use MTA services so many people carpool or rely on rides from friends/families. Colleges reported that many classes were not completed until after service ended. The only segment that did report frequent usage was healthcare which made sense as they tend to be more daytime appointments than evening. MTA used this information to begin expanding evening service, starting in 2018 and now runs three evening routes to better meet the needs of this population. The final point of interest was that Spanish was easily the predominant group that agencies reported working with. Interestingly, while French is the second most common language according to the Census, there was virtually no reported instances of French LEP clients but Nepali and Arabic were mentioned as frequent LEP clients. MTA will evaluate these two populations in future years to determine if they warrant inclusion in the LAP.

MTA has determined that the proportion of LEP populations who utilize the services is fairly low (not unlike the general population in New Hampshire where funding challenges make service options to attract choice riders very difficult to implement). However, among those LEP persons who do utilize MTA services, the frequency that they interact with MTA staff and materials is high. The MTA Short Range Transit Plan written by the Southern New Hampshire Planning Commission (SNHPC) provides data that can be used to estimate specific frequencies for LEP populations. The Plan cites that 85% of residents live within 0.25 miles (approximately 4 blocks) of MTA

service. Applying that figure to the 5,271 estimated individuals who speak English less than well cited in the American Fact Finder table yields 4,480 individuals who are considered to have access to MTA service. MTA then uses the Coordinated Public Transit Human Services Transportation Plan, again authored by SNHPC, which shows 0.6% of trips taken are done via public transportation. To be conservative, MTA assumes that 100% of those trips are with MTA though other providers operate in the City. That yields an estimated 28.55 individuals who use MTA service and speak English less than well. Based on MTA's average daily ridership of approximately 1,875 passengers, this equates to roughly 1.0% of ridership.

Factor 3: The Importance of MTA Service to People's Lives

Access to the services provided by MTA, both on fixed route and paratransit, are critical to the lives of many in our service area. Many depend on MTA for access to jobs and essential community services like schools, shopping, and medical appointments. A large number of MTA riders are transit dependent so without MTA service, they do not have another method of travel available to them. Because of the essential nature of the services and the importance of these programs in the lives of many of the area's residents, there is a need to ensure that language is not a barrier to access.

MTA Vital Documents (available in Spanish or French on request):

- Route and schedule information
- Fare and payment information
- StepSaver (paratransit) application, service description, appeals process, and no show policy
- Title VI Notice, Complaint Process and Complaint Form
- Public hearing/meeting notices
- Postings of service changes and public comment options
- CART service materials/brochure

An example of vital document translation can be found in Appendix A1 and A2 which show the English, French and Spanish versions of the Title VI notice posted on vehicles. All of the above vital documents are on hand in Spanish and French should a request be

received. MTA will also attempt to obtain alternative translations as described in Factor 4.

Factor 4: Resources available to MTA for LEP outreach, as well as the costs associated with that outreach.

MTA has committed resources to improving access to its services and programs for LEP persons. Bilingual information (English/Spanish/French) is distributed in an extensive number of mediums including:

1. Bilingual transit bus operators who can facilitate communication between passengers and other drivers or dispatch via the onboard radio
2. Translation of our website and all posted materials into dozens of languages.
3. Translation of Facebook page and posts through online translation.
4. Active participation by MTA staff on local social service councils and committees engaged with LEP populations
5. Availability of Vital Documents in Spanish and French. Additionally, MTA has a partnership with the Manchester Community Health Center, who has on staff translators, that enables us to obtain translated materials in other languages upon request. There may be a delay of up to one week for these whereas Spanish is available immediately upon request
6. On board tablets able to translate Spanish or French to English and vice versa as well as translate additional language. MTA is in process of training of merging with CART and will install and deploy this technology into the CART service area this fall.

Using the four factor analysis above, MTA has developed the following Language Assistance Plan (LAP). MTA will do the following:

- Provide translation services for all elements of our website through Google Translate. Please note, while only required to be done for Spanish and French, MTA is able to accommodate dozens of language above and beyond the minimum requirement.
- Provide paper or electronic copies of all vital documents in Spanish and French. If possible, MTA will also provide translations in other languages above and beyond the minimum requirements.
- Include the lines “If information is needed in another language, then contact MTA at 603-623-8801”; “Si se necesita información en otro idioma, comuníquese con MTA al 603-623-8801” and “Si des informations sont nécessaires dans une autre langue, contactez MTA au 603-623-8801.” on all postings.
- Utilize the services of Language Line Solutions for telephone interpreting for Spanish speaking callers.
- Provide operators with tablets capable of translating between English and Spanish for use with passengers needing assistance.
- Review the above steps in the event another language crosses the safe harbor threshold or if MTA receives comments regarding unmet need through our Public Participation Plan.

Operator Training

MTA requires all transit operators to complete a minimum of 8 hours of safety and customer service training annually. Part of this training includes familiarization with tablet translation technology and customer service for passenger with disabilities or limited English proficiency.

H. Requirement to Provide Additional Information Upon Request

At the discretion of the FTA, information other than that required by the referenced circular may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about

possible noncompliance with Title VI requirements. The MTA Title VI Complaint Coordinator (Assistant Director: Transit Operations) is available to provide additional information as needed and to respond to any inquiry.

III. SUMMARY OF PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

MTA annually publishes its Program of Projects via a joint effort with our MPO, the Southern New Hampshire Planning Commission (SNHPC). This process satisfies the requirements of this section.

Outreach to the minority community is undertaken regularly through distribution of notices to the Minority Health Coalition and Latinos Unidos for their inclusion of the information in their outreach materials. MTA is a member of the Healthy Eating, Active Living (HEAL) effort which aims to improve health and quality of life for low income and minority populations, which includes many LEP persons. MTA has worked to ensure transportation is included as a barrier consideration when outreach efforts are drafted by these and other stakeholders. MTA has joined the Project LAUNCH initiative and the Downtown Committee of the Chamber of Commerce as well as developing a translation partnership with the Manchester Community Health Center for translation services if requested for languages other than Spanish. The MTA Executive Director serves as the Vice Chair of the Region 8 Coordination Council which has oversight of several projects tailored to low income and senior populations as well as being tasked with increasing transportation access by reducing redundancies in service.

Additional outreach was performed through participation with New Hampshire's 211 information system. By dialing 211, residents of the State of New Hampshire can access multiple resources in a broad range of categories, including MTA under transportation. Assistance is available through 211 for callers that would prefer an alternate language.

G. Requirement to develop quantitative service standards.

- MTA utilizes a load factor of 1.0 for all fixed route operations. While standees are permitted on board, the goal is to provide a seat for all passengers. MTA has met this goal with a 100% success rate during the last three years.

- MTA does not have vehicle headway standards as no fixed routes are served by more than one bus at a time. MTA operates a hub and spoke system based in downtown Manchester with all routes pulsing out and then returning to downtown. At no time is more than 1 vehicle providing service on a route.
- MTA considers vehicles to be on time if they depart a scheduled timepoint within five minutes of the scheduled time. At six minutes behind schedule, the vehicle is considered to be late. At fifteen minutes behind schedule, the trip is considered to have been missed. It is the goal of MTA to achieve a 90% or greater on time performance rate. MTA continuously monitors this metric and reports performance monthly to the Board of Commissioners, City of Manchester, and results are made public for access by the public.
- MTA has a service availability goal that aims to provide fixed route transportation access within 0.75 miles of 85% of residents in the service area. This service area is comprised almost entirely of Manchester with very limited service to sections of Bedford, Londonderry, Hooksett, and Goffstown. Effective October 1st, MTA will absorb the CART system and demand response service will be provided in Derry, Londonderry, Salem, Hampstead, and Chester as well as a single fixed route shopping bus in Salem.

H. Requirement to develop qualitative service procedures.

- MTA has only 1 facility where all vehicles are stored. The fleet is comprised of sixteen fixed route vehicles which includes sixteen 30' ADI low floor buses. There is also a single low floor cutaway used exclusively on the Green DASH route. Specific route and vehicle assignment is varied daily in an effort to evenly distribute vehicle miles throughout the system.
- Installation of transit amenities along bus routes by MTA would be based on the number of passenger boardings at stops along those routes. Currently, MTA does not provide any amenities. Bus stops primarily consist of a sign on a post. In some locations bus shelters (non-MTA owned or maintained) may be placed at the discretion of

private business or landlords as a convenience for their customers or tenants. While MTA will stop at these shelters, we primarily have no oversight or authority over them and no FTA funds are associated with them. In 2018, MTA received ownership of 15 shelters but they were left where they were installed by the original private sector business.

This plan was approved by the MTA Board of Commissioners on August 26, 2025. A copy of the minutes from these meeting are included in this plan as Attachment G.

APPENDIX A1

Manchester Transit Authority Title VI Notice to Public

The Manchester Transit Authority hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding the MTA's programs has a right to file a formal complaint with the MTA. Any such complaint must be in writing and submitted to the MTA Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence.

For more information regarding civil rights complaints, please contact:

**Title VI Coordinator
Manchester Transit Authority
110 Elm Street
Manchester, NH 03101**

(603) 623-8801

Or visit:

<http://www.mtabus.org/about-mta/customer-service/>

APPENDIX A2 (Spanish)

Autoridad de Tránsito de Manchester Título VI Notificación al público

Por este medio, la Autoridad de Tránsito de Manchester notifica públicamente su política de respaldar y garantizar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987 y todos los estatutos relacionados. El Título VI y estatutos relacionados que prohíben la discriminación en programas asistidos por el gobierno federal requieren que ninguna persona en los Estados Unidos de América, por motivos de raza, color, origen nacional, sexo, edad o discapacidad sea excluida de la participación. Beneficios o ser objeto de discriminación en cualquier programa o actividad que reciba asistencia federal.

Toda persona que crea que ha sido agraviada por una práctica discriminatoria ilegal con respecto a los programas de la MTA tiene el derecho de presentar una queja formal con la MTA. Cualquier queja debe ser por escrito y presentada al Coordinador del Título VI de la MTA dentro de los ciento ochenta (180) días siguientes a la fecha de la presunta ocurrencia.

Para obtener más información r Gårding quejas de derechos civiles e , por favor, póngase en contacto con:

**Title VI Coordinator
Manchester Transit Authority
110 Elm Street
Manchester, NH 03101**

(603) 623-8801

O visitar:

[Http://www.mtabus.org/about-mta/customer-service/](http://www.mtabus.org/about-mta/customer-service/)

APPENDIX A3 (French)

Manchester Transit Authority Titre VI Avis au public

La Manchester Transit Authority annonce publiquement sa politique visant à maintenir et à assurer le plein respect du titre VI de la loi sur les droits civils de 1964, de la loi sur la restauration des droits civils de 1987 et de toutes les lois connexes. Le Titre VI et les lois connexes interdisant la discrimination dans les programmes bénéficiant de l'aide du gouvernement fédéral exigent qu'aucune personne aux États-Unis d'Amérique ne soit, en raison de sa race, de sa couleur, de son origine nationale, de son sexe, de son âge ou de son handicap, avantages, ou être autrement soumis à la discrimination dans le cadre de tout programme ou activité bénéficiant de l'aide fédérale.

Toute personne qui pense avoir été lésée par une pratique discriminatoire illégale à l'égard des programmes du MTA a le droit de déposer une plainte formelle auprès du MTA. Toute plainte de ce type doit être écrite et soumise au coordonnateur du titre VI du MTA dans les cent quatre vingt (180) jours suivant la date du prétendu événement.

Pour plus d'informations sur les plaintes en matière de droits civils, veuillez contacter:

**Titre VI Coordinateur
Manchester Transit Authority
110 rue Elm
Manchester, NH 03101**

(603) 623-8801

Ou visitez:

<http://www.mtabus.org/about-mta/customer-service/>

APPENDIX B

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 Manchester Transit Authority (MTA).

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 the MTA may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a written complaint to the following address:

**Title VI Coordinator
Manchester Transit Authority
110 Elm Street
Manchester, NH 03101
Phone: (603) 623-8801**

The following measures will be taken to resolve Title VI complaints:

- 1.) A formal complaint form must be filed within 180 days of the alleged occurrence. Title VI Complaint Forms are available by mail or at MTA upon request as well as available online at www.mtabus.org. The complaint form must be signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of 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 MTA Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the MTA 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 receipt of a complete complaint, the MTA will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, 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 not to 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 the MTA's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6.) When the MTA 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 the MTA's resolution of the complaint, he/she has the right to file a complaint with the:

**Federal Transit Administration
FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington D.C. 20590**

- If information is needed in another language, then contact MTA at 603-623-8801.
- Si se necesita información en otro idioma, comuníquese con MTA al 603-623-8801.



Dan Elliott, Chair
Marlana Trombley, Vice Chair
Michelle Lauder
Alexandra Horton
Patrick Arnold

Mike Whitten, Executive Director

Title VI & ADA Complaint Form

It is the mission of MTA to provide safe, reliable, affordable, and efficient public transportation in a nondiscriminatory manner without regard to race, color, or national origin. If you feel that MTA has failed to fulfill this mission, please complete the form below and submit it to MTA in person or by mail at the following address within one hundred and eighty (180) days of the alleged occurrence.

Manchester Transit Authority
Ryan Renauld-Smith, Assistant Director
110 Elm Street
Manchester, NH 03101

603-623-8801

Section I:

Name: _____

Address: _____

Telephone (Home): _____

Telephone (Work): _____

Electronic Mail Address (email): _____

Accessible Format Requirements? (please check any that apply)

Large Print _____ Audio Tape _____ TDD _____ Other _____

Section II:

Are you filing this complaint on your own behalf? (please circle one) Yes* No

*If you answered "yes" to this question, please go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining: _____

Please explain why you have filed for a third party: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. (please circle one) Yes No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Disability

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency? (please circle one) Yes No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____

State Agency: _____

State Court: _____

Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

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

Title VI Coordinator
Manchester Transit Authority
110 Elm Street
Manchester, NH 03101

APPENDIX D

**MANCHESTER TRANSIT AUTHORITY
TITLE VI INVESTIGATIONS, LAWSUITS, AND COMPLAINTS**

	Date	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1				
2				
Lawsuits				
1				
2				
Complaints				
1				
2				

As of November 28, 2022, there are no active investigations, lawsuits, or complaints against MTA under Title VI.



APPENDIX E

Public Participation Plan

MTA has developed this Public Participation Plan (PPP) in an effort to ensure that no one is precluded from participating in our service planning and development process. MTA pledges 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 MTA decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- MTA will seek out and facilitate the involvement of those potentially affected.

This plan has been designed to encourage and guide public involvement efforts and enhance access to MTA transportation decision-making by minority and Limited English Proficient (LEP) populations. LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well.

The steps outlined in the public participation plan offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at MTA. It is a guide for how MTA engages its diverse community. MTA may continue to improve its public participation methods over time based on feedback from all of its

riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.

Specific Goals of the PPP

1. **Clarity in Potential for Influence-** The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
2. **Consistent Commitment-** MTA communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
3. **Diversity-** Participants represent a range of socioeconomic, ethnic, and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents with LEP.
4. **Accessibility-** Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
5. **Relevance-** Issues are framed in such a way that the significance and potential effect is understood by participants.
6. **Participant Satisfaction-** People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
7. **Partnerships-** MTA develops and maintains partnerships with communities through the methods described in this plan.
8. **Quality Input and Participation-** That comments received by MTA are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Specific Objectives of the PPP

1. Flexibility- The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
2. Inclusiveness- MTA will proactively reach out to and engage low income, minority and LEP populations from the MTA service area.
3. Respect- All feedback will be given careful and respectful consideration.
4. Proactive and Timeliness- Participation methods will allow for early involvement and be ongoing.
5. Clear, Focused and Understandable- Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
6. Responsiveness- MTA will respond and incorporate appropriate public comments into transportation decisions.
7. Accessibility- Meetings will be held at locations which are fully accessible for participants with disabilities and easily reached via public transportation. Currently, all meetings are held either at MTA or City Hall. Both of these locations meet this objective.

When will the PPP be used?

MTA will use this PPP when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- A fare increase is being considered
- A reduction in the methods of fare payments available is being considered
- A new route is established
- An existing route is proposed for elimination
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered

- Any system-wide change in service hours that exceeds 10% of current total service hours
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s)
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.

For minor schedule and service changes that do not rise to the level of those above, MTA will post service change notices on buses and our website thirty (30) days in advance of the change date.

Capital Programming

For its capital programming, including major facility and bus procurements, MTA uses the Southern New Hampshire Planning Commission (SNHPC) adopted public participation plan. This plan clearly indicates that the MPO's public participation process satisfies the MTA's public participation requirements for the Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement.

The Process

MTA's Public Participation Process includes the following steps:

1. A service/fare change proposal is developed. This can be done either internally or as a result of public comment.
2. A Title VI review of the proposal is conducted.
3. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the MTA service area**.

4. Public outreach materials and an agenda are developed and available in English and Spanish.
5. Outreach in advance of public information session is released. This is done via a variety of mediums including public notices, MTA website, MTA Facebook page, postings on revenue vehicles, and notification to community groups like the Regional Coordination Council and other stakeholders.
6. Local radio station interviews may be conducted as may broadcasts on public access TV. Any public hearings will be broadcast on public access TV if available.
7. A thirty day (30) public comment period begins. Comments may be submitted to MTA via mail, email, Facebook message, or telephone.
8. Public comment period closes.
9. MTA evaluates any comments received and makes changes to the proposal as appropriate.
10. MTA Board of Commissioners approves final service/fare change and notification to public is made as to effective date.

** A note on meeting locations. When determining locations and schedules for public meetings, MTA will schedule them at times and locations that are convenient and accessible for minority and LEP communities. They generally happen at MTA or City Hall and are usually in Town Hall style formats though other formats may be used as needed. MTA will coordinate with community organizations, educational institutions, and others to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities. Public transportation will always be available to meeting locations.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendations are of

particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations/businesses. While stakeholders may vary based on the plan or program being considered, MTA has assembled a listing of stakeholders with whom we regularly communicate through email and/or direct mail. To join this list, contact MTA at 603-623-8801. You can also contact MTA to request a representative attend a regular meeting of your organization.

MTA is a current, regular participant in the following community outreach organizations:

- Region 8 Coordination Council which includes oversight and selection of programs aimed at seniors and low income populations and aims to expand access to transportation through the elimination of redundant service and identification of transportation gaps
- Project LAUCH- a partnership of local non-profit and social service agencies working to reduce barriers to community services including public transportation and has special focus on LEP and minority/refugee residents
- Healthy Eating Active Living (HEAL)- an initiative through the Public Health Department to improve health of low income and at risk populations through diet, exercise and preventive medical care
- Downtown Committee- Part of the Greater Manchester Chamber of Commerce tasked with improving the Downtown experience for residents, shoppers, visitors, employers, and anyone else coming to Downtown. Due to the large number of low income residents in this area and limited parking availability for businesses, public transit is a frequent topic of discussion. This group spearheaded the creation of what is now our Green DASH service connecting Downtown and the Millyard.