Federal Transit Administration Title VI Program

Granite State Independent Living

November 2023

Title VI Plan Table of Contents

The **Granite State Independent Living** Title VI plan includes the following elements:

- 1. Plan Approval, Annual Certifications and Assurances, Revision Log
- 2. Policy Statement
- 3. Notice to the Public
- 4. Complaint Procedure
- 5. Complaint Form
- 6. List of transit related Title VI Investigations, Complaints and Lawsuits
- 7. Public Participation Plan
- 8. Language Assistance Plan
- 9. Minority Representation Table and Description
- 10. Providing Assistance to and Monitoring Subrecipients
- 11. Title VI Equity Analysis for Facility Acquisition
- 12. Fixed Route Transit Provider Requirements

Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan Adopted on:	November 6, 2023
Adopted by:	Grante State Independent Living's Board of Directors

Signature(s):

Deborah Ritcey, President & CEO

Approval:

Annual Certifications and Assurances

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

Granite State Independent Living will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

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

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
August 1, 2020	All	Updated as required
November 6, 2023	All	Updated as required

Section 2: Title VI Policy Statement

Policy Statement

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

Title VI Notice to the Public

Granite State Independent Living Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Granite State Independent Living

- Granite State Independent Living operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Granite State Independent Living.
- For more information on Granite State Independent Living's civil rights program, the
 procedures to file a complaint, or to file a complaint, please contact **Deb Ritcey**, **CEO** at
 (603)228-9680, dritcey@gsil.org or visit our administrative office at 21 Chenell Dr. Concord,
 NH 03301. For more information, visit www.gsil.org
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

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

If information is needed in another language, contact 603-228-9680

The **Granite State Independent Living** Notice to the Public is posted in the public areas of the office and inside the transit vehicles. We also offer this in Spanish.

Notificación al público de los derechos bajo Título VI

Granite State Independent Living

- Granite State Independent Living opera sus programas y servicios sin distinción de raza, color u origen nacional de acuerdo con Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido resentido por cualquier práctica discriminatoria ilegal según el Título VI puede presentar una queja ante Granite State Independent Living.
- Para obtener más información sobre el programa de derechos civiles de Granite State Independent Living, los procedimientos y para presentar una queja, comuníquese con Deb Ritcey, directora ejecutiva

al (603)228-9680, <u>dritcey@gsil.org</u> o visite nuestra oficina administrativa en 21 Chenell Dr. Concord, NH 03301. Para obtener más información, visite www.gsil.org

• Para asuntos del Título VI relacionados con el transporte, también se puede presentar una queja directamente ante:

Departamento de Transporte de New Hampshire, a la atención de: Shannon Aiton, Título VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; Teléfono de texto: 800-735-2964; titlevi@dot.nh.gov

Administración Federal de Tránsito, Oficina de Derechos Civiles, a la atención de: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

• Si necesita información en otro idioma, llame a 603-228-9680

Section 4: Title VI Complaint Procedure

Granite State Independent Living's Title VI Complaint Procedure is made available in the following locations:

- ☐ Agency website: www.gsil.org
- ☑ Hard copy in the Concord office
- ☑ Agency Title VI Plan

Any individual, group of individuals or entity that believes they have been discriminated against based on race, color, or national origin by **Granite State Independent Living** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form to the Compliance Officer.

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

A complaint must be filed with **Granite State Independent Living** no later than 180 days after the following:

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

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

Granite State Independent Living has 45 days to investigate the complaint. If more information is needed to resolve the case, Granite State Independent Living may contact the complainant requesting further information. The complainant has **30** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the

complainant or does not receive the additional information within **30** business days, Granite State Independent Living can administratively close the case.

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

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

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **10** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

Or

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

If information is needed in another language, then contact (603)228-9680.

Section 5: Title VI Complaint Form

Granite State Independent Living's Title VI Complaint Procedure is made available in the following locations:

☐ Agency website: www.gsil.org

☑ Hard copy in the central office

☑ Agency Title VI Plan

Graninte State Independent Living

Title VI Complaint Form

Section I:	
Name:	
Address:	
Telephone (Home):	Telephone (Work):
E-Mail Address:	

Accessible Format Requirements?	Large Print	Audio Tape				
	TDD	Other				
Section II:						
Are you filing this complaint on your own behalf? Yes* No						
*If you answered "yes" to this questi	on, go to Section III.					
If not, please supply the name and reyou are complaining:	If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for	r 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.						
Section III:						
I believe the discrimination I experienced was based on (check all that apply):						
Title VI: [] Race [] Color [] National Origin						
Other (specify):						
Date of Alleged Discrimination (Month, Day, Year):						
persons who were involved. Include	appened and why you believe you were on the name and contact information of the contact information of any witnesses. If	e person(s) who discri	minated against			
Section IV						
Have you previously filed a Civil Righ	ts related complaint with this agency?	Yes	No			
Section V						
Have you filed this complaint with ar	ny other Federal, State, or local agency, o	or with any Federal or	State court?			

[] Yes [] No	
If yes, check all that apply:	
[] Federal Agency:	<u> </u>
[] Federal Court	[] State Agency
[] State Court	[] Local Agency
If marked Yes in Section V, please provide in complaint was filed.	formation about a contact person at the agency/court where the
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	
You may attach any written materials or othe complaint. Signature and date required below	er information that you think is relevant to your
Signature	Date
Please submit this form in person at the add	ress below, or mail this form to:
Granite State Independent Living Deb Ritcey, CEO	

Granite State Independent Living Deb Ritcey, CEO 21 Chenell Dr. Concord, NH 03301 Phone: (603)228-9680

Email: dritcey@gsil.org

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

Granite State Independent Living maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

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

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

Check One:

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

- ✓ Provide for early, frequent, and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television, or newspaper ads on stations and in publications that serve LEP populations.

 Outreach to LEP populations may also include audio programming available on podcasts.

✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by Granite State Independent Living since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

	Granite State Independent Living		Communication Method	
Event Date	Staffer(s) or Department	Activity	(Public notice, posters, social media)	Notes
5/10/2023	Community Outreach	Booth Event	Public Notice	NHAT Connect at Expo
4/22/2023	Community Outreach	Booth Event	Public Notice	Age of Champions
4/11/2023	Community Outreach	Booth Event	Public Notice	Capital Area Regional Transition Fair
2/25/2020	Community Outreach	Presentation	Public Notice	Plymouth Regional Senior Center
2/20/2020	Community Outreach	Group meeting	Public Notice	Manchester Community Resource
2/20/2023	Community Outreach	Booth Event	Public Notice	NH Council on Developmental Disabilities
1/28/2023	Community Outreach	Presentation	Public Notice	Concord Hospital

Section 8: Language Assistance Plan

Plan Components

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

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

The Granite State Independent Living Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

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

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, **Granite State independent Living** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency **Granite State Independent Living's** staff comes into contact with LEP persons. Examples of contact could include:

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

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

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

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

Of the 1,308,66 residents in the **Granite State Independent Living** service area, 31,406 residents describe themselves as speaking English less than "very well". For the Granite State Independent Living service area, the latest U.S. Census Bureau data shows that among the area's population 2.40% speak English "less than very well." **For these groups** who speak English "less than very well", 0.83% speak Spanish.

New Hampshire			
Label	Estimate	Percent of Total Population	Margin of Error
Total:	1,308,666		±263
Speak only English	1,203,558	91.97%	±2,782
Spanish:	32,455	2.48%	±1,301
Speak English "very well"	21,593	1.65%	±1,192
Speak English less than "very well"	10,862	0.83%	±871
French, Haitian, or Cajun:	17,352	1.33%	±1,152
Speak English "very well"	13,962	1.07%	±959
Speak English less than "very well"	3,390	0.26%	±518
German or other West Germanic languages:	4,174	0.32%	±674
Speak English "very well"	3,683	0.28%	±601
Speak English less than "very well"	491	0.04%	±216
Russian, Polish, or other Slavic languages:	5,159	0.39%	±728
Speak English "very well"	3,495	0.27%	±545
Speak English less than "very well"	1,664	0.13%	±414
Other Indo-European languages:	19,870	1.52%	±1,681
Speak English "very well"	14,237	1.09%	±1,389
Speak English less than "very well"	5,633	0.43%	±680
Korean:	1,468	0.11%	±332
Speak English "very well"	764	0.06%	±213
Speak English less than "very well"	704	0.05%	±251
Chinese (incl. Mandarin, Cantonese):	5,531	0.42%	±825

Speak English "very well"	3,102	0.24%	±543
Speak English less than			
"very well"	2,429	0.19%	±516
Vietnamese:	2,216	0.17%	±521
Speak English "very well"	905	0.07%	±209
Speak English less than		0.400/	
"very well"	1,311	0.10%	±449
Tagalog (incl. Filipino):	1,673	0.13%	±377
Speak English "very well"	1,373	0.10%	±349
Speak English less than "very well"	300	0.02%	±147
Other Asian and Pacific Island			
languages:	7,687	0.59%	±758
Speak English "very well"	5,380	0.41%	±628
Speak English less than			
"very well"	2,307	0.18%	±549
Arabic:	2,807	0.21%	±706
Speak English "very well"	1,658	0.13%	±508
Speak English less than "very well"	1,149	0.09%	±378
Other and unspecified			
languages:	4,716	0.36%	±843
Speak English "very well"	3,550	0.27%	±688
Speak English less than "very well"	1,166	0.09%	±397

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

Granite State Independent Living assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Granite State Independent Living did not provide any rides to LEP persons this year, if an individual has speech limitations, the dispatcher or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

Access to the services provided by GSIL are critical to the lives of many in the service area. Many depend on GSIL's services for access to essential services. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

All of Granite State Independent Living's programs are important; however, those related to safety, nondiscrimination, and public involvement are among the most important. Granite State Independent Living is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, Granite State Independent Living will strive to provide alternative but meaningfully

accessibility. Moreover, Granite State Independent living continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in insert languages(s) upon request.

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

Through employee and stakeholder input it has been determined that interactions with people who speak limited English are a very small percentage of regular transactions, and that similar community partners are able to overcome the language barriers with community translation or interpretation services such as the Language Bank, working through a family member or social worker who is able to translate, and using apps such as Google Translate. Therefore, printed information and materials about GSIL transportation services are not created unless requested. The cost of translation service would be within the regular budget of the organization. Essential documents such as the [transportation rider's guide] Title VII, Part B GSIL Mobility Device Accessible Transportation Services and the complaint form will be translated if requested.

<u>Outcomes:</u> As mentioned above, there is no way to determine both the Limited English Proficient and disabled/eligible for service population beyond gross approximation. Through other inclusion factors including open board meetings, available translation services, interaction with family members and care-providers that may be able to translate, and the small (to non-existent) number of existing transactions where language in a barrier, GSIL provides adequate opportunity for people with limited English proficiency to obtain service and influence service-related decisions.

Granite State Independent Living Transportation Dept. distributed a language survey to all consumers. The objective of the survey was to evaluate the needs of GSIL customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with ABC riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	24%
Face to Face	75%
Email	1%
Fax	<u>0%</u>

Next, the survey asked how often employees come into contact with LEP customers. The chart below outlines the results.

Frequency of Interaction	Percent of Responses
Often	0%

Sometimes	0%
Rarely	1%
Never	99%

Next, the survey asked employees to identify how often they interact with the following languages on a typical workday.

Language	Percent of Interactions
English	100%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient ABC passengers. The results are summarized below. *(currently GSIL has no experience with riders with LEP).

Effectiveness	Percent of Total Responses
Very Effective	0%
Moderately Effective	0%
Less Effective	100%*
Unable to Communicate	0%

Training Employees

GSIL plans to conduct employee training on how to utilize the Language Bank, as well as Employee awareness training for to support basic communicate with the LEP and low-literacy population.

Granite State Independent Living makes every effort to make its programs, services, and activities, accessible to LEP individuals. Granite State Independent Living will use available resources, both internal and external to accommodate reasonable requests for translations.

LEP Policy

Granite State Independent Living shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English

proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with the Language Bank to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 603-228-9680.

Si usted necesita ayuda con el inglés, por favor llame 603-228-9680.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website http://www.lep.gov/lSpeakCards2004.pdf

Mark this		
Box if you speak	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果 说中 国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिहिनत करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Log of LEP Encounters: currently GSIL has no experience with riders with LEP

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

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

Section 9: Minority Representation Information

GSIL can speak and think with authority on behalf of the people we serve because we are led by a board of directors and staff of which over 51% are people with disabilities.

GSIL's Services have been prepared to ensure that no one is precluded from participating in GSIL's service planning and development process. We ensure that:

- Potentially affected consumers 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 GSIL's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- GSIL will seek out and facilitate the involvement of those potentially impacted by LEP.

A. Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Granite State Independent Living Board of Directors	12 - 100%	0	0	0	0	0

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

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, Granite State Independent living strives to be as inclusive as possible and is pleased to say 67% of our board members identify as a person living with a disability. The board is currently working on board diversification for other minorities.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

☑ No, the agency does not have subrecipients.					
\square Yes. If yes, list the subrecipient names: (list other agency names here)					
Insert Agency Name monitors subrecipients using the following process:					
 Granite State Independent Living uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here) 					
 Granite State Independent Living collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here) 					
Section 11: Title VI Equity Analysis for Facility Acquisition					
Title 49 CFR, Appendix C, Section (3)(iv) requires "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below) No, the agency has not built a facility. Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)					
Section 12: Fixed Route Transit Providers Service Standards and Policies					
FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.					
Granite State Independent Living:					
\square is a fixed route transit provider					
⊠ is not a fixed route transit provider					