



***Title VI and Environmental Justice
Program***
(Non-Discrimination in Federally Assisted Programs)

Adopted December 19, 2017

Southern New Hampshire Planning Commission
438 Dubuque St.
Manchester, NH 03102

RESOLUTION

ADOPTION OF THE SOUTHERN NEW HAMPSHIRE PLANNING COMMISSION TITLE VI AND ENVIRONMENTAL JUSTICE PROGRAM

WHEREAS, the Southern New Hampshire Planning Commission (SNHPC) is the designated Metropolitan Planning Organization (MPO) for transportation planning in 14 municipalities including and surrounding the City of Manchester in southern New Hampshire; and

WHEREAS, to fund its work activities, the SNHPC receives direct or pass-through federal funding from agencies including, but not limited to, the U.S. Department of Transportation's Federal Highway Administration (FHWA) and Federal Transit Administration (FTA); and

WHEREAS, as a recipient of federal funds, the SNHPC is required to comply with Title VI of the Civil Rights Act of 1964, which requires that no person shall, on the grounds of race, color, national origin, sex, age, disability, or income status be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity carried out by the SNHPC; and

WHEREAS, the SNHPC Title VI and Environmental Justice Program has been reviewed through the SNHPC MPO; and

WHEREAS, the SNHPC MPO has involved the public and interested stakeholders in an open and transparent process to review the Title VI and Environmental Justice Program as guided by the MPO's Public Participation Plan, including a public comment period and a duly noticed public hearing; and

NOW THEREFORE, BE IT RESOLVED THAT:

1. The Southern New Hampshire Planning Commission, in its capacity as the Metropolitan Planning Organization (MPO), approves the SNHPC Title VI and Environmental Justice Program.
2. Sylvia von Aulock, Executive Director of the Southern New Hampshire Planning Commission MPO, forwards this Resolution to the NHDOT and federal partner agencies for their records.

The undersigned duly qualified Chair of the Southern New Hampshire Planning Commission hereby certifies that the foregoing is a true and correct copy of the Resolution, adopted at a legally convened meeting of the Southern New Hampshire Planning Commission, acting in its capacity as the Metropolitan Planning Organization, held on December 19, 2017 in the offices of the Commission located at 438 Dubuque Street, Manchester, New Hampshire.

12/19/17
Dated


Frederick McGarry, Chair
Southern NH Planning Commission

Attest:

12/19/17
Dated



Sylvia von Aulock, Executive Director
Southern NH Planning Commission

TABLE OF CONTENTS

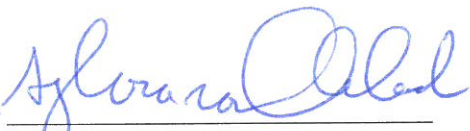
1.0	TITLE VI POLICY STATEMENT.....	3
2.0	OBJECTIVES.....	4
3.0	GENERAL REQUIREMENTS	4
3.1	Requirement to Provide Title VI Assurances	4
3.2	Requirement to Prepare and Submit a Title VI Program	5
3.3	Requirement to Notify Beneficiaries of Protection Under Title VI.....	5
3.4	Requirement to Develop Title VI Complaint Procedures and Complaint Form	6
3.5	Requirement to Record and Report Title VI Investigations, Complaints, and Lawsuits	6
3.6	Requirement to Promote Inclusive Public Participation.....	7
3.7	Requirement to Develop a Demographic Profile of the Metropolitan Area.....	9
3.8	Requirement to Provide Meaningful Access to LEP Persons	17
3.9	Minority Representation on Planning and Advisory Bodies.....	21
3.10	Providing Assistance to Sub-recipients	21
3.11	Monitoring Sub-recipients.....	21
3.12	Determination of Site or Location of Facilities.....	22
3.13	Requirement to Provide Additional Information Upon Request.....	22
3.14	Annual Reporting of Accomplishments	22
4.0	REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS	22
4.1	Requirement that Metropolitan Planning Activities Comply With Title VI	23
4.2	Requirements for Program Administration	23
	APPENDIX A – TITLE VI NOTICE TO THE PUBLIC.....	25
	APPENDIX B – TITLE VI CERTIFICATIONS AND ASSURANCES.....	27
	APPENDIX C- TITLE VI COMPLAINT FORM AND INVESTIGATION PROCEDURES	29
	APPENDIX D - SNHPC MPO & TAC MEMBERSHIP	33

1.0 TITLE VI POLICY STATEMENT

It is the policy of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all Federal programs and activities. Pursuant to this obligation, no person shall, on the grounds of race, color, national origin, sex, age, disability, or income status be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity carried out by the SNHPC. The SNHPC will also monitor and enforce statutory requirements imposed on its sub-recipients and participants of Federally-assisted programs and projects. The SNHPC further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

The SNHPC MPO operates without regard to race, color, national origin, sex, age, creed, disability, or income status. SNHPC MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact the SNHPC Office Administrator at 603-669-4664, or by email: lmoore-o'brien@snhpc.org.

If you feel you have been discriminated against based on your race, color, national origin, sex, age, creed, disability or income status, you may file a complaint following the SNHPC MPO Title VI Complaint Form (included as Appendix C of this document). If you cannot download the document, or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.



Sylvia von Aulock
Executive Director & CEO

12/19/17
Date

2.0 OBJECTIVES

The Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) 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. Department of Transportation 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 Requirements and Guidelines for Federal Transit Administration Recipients”, October 1, 2012.

The objectives of the program are as follows:

- A. To ensure the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. To identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. To promote the full and fair participation of all affected populations in transportation decision-making;
- D. To prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- E. To ensure meaningful access to programs and activities by persons with limited English proficiency.

3.0 GENERAL REQUIREMENTS

As part of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) Title VI Program, the MPO maintains certain reporting requirements and provides the New Hampshire Department of Transportation (NHDOT) and Federal Transit Administration (FTA) the following information regarding these reporting requirements. In addition to the first 12 General Requirements below, which are required of all recipients of Federal aid, Metropolitan Planning Organizations must respond to additional requirements related to planning of federally-funded transportation projects, and program administration, which are addressed at the end of this section.

3.1 Requirement to Provide Title VI Assurances

The SNHPC MPO will submit its Title VI Assurances as part of its annual *Certifications and Assurances* submission to NHDOT, FHWA, and FTA. The SNHPC MPO acts as the Lead Agency for the administration of FTA Section 5310 Purchase of Service and Formula Funds on behalf of the Region 8 Coordinating Council for Community Transportation. The current sub-

recipients of this funding are the Manchester Transit Authority, Easter Seals of New Hampshire, and The CareGivers, Inc. The SNHPC MPO will collect Title VI Assurances from sub-recipients prior to passing through FTA funds.

A copy of the Title VI Assurances included in the SNHPC's annual *Certifications and Assurances* submission to NHDOT, FHWA and FTA is included in Appendix B of this document.

3.2 Requirement to Prepare and Submit a Title VI Program

This document constitutes the Title VI Program for the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO).

3.3 Requirement to Notify Beneficiaries of Protection Under Title VI

The SNHPC MPO has established methods for notification to the public regarding its Title VI obligations, how to get more information regarding the MPO's non-discrimination obligations, and procedures for filing a discrimination complaint against the MPO. The public notice is included in Appendix A of this document.

The public notice is posted at the MPO offices, and is accessible on the MPO website at www.snhpc.org. Below are English and Spanish versions of the SNHPC MPO's Notification of Protection:

English

The SNHPC MPO operates without regard to race, color, national origin, sex, age, religious creed, disability, sexual orientation, or income status. SNHPC MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact the SNHPC Office Administrator at 603-669-4664 or by email: lmoore-o'brien@snhpc.org.

If you feel you have been discriminated against based on your race, color, national origin, gender, age, creed, disability or income status, you may file a complaint using the SNHPC MPO Title VI Complaint Form. If you cannot download the document, or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.

Spanish

La Comisión de Planificación Southern New Hampshire Organización de Planificación Metropolitana opera sin distinción de raza, color, origen nacional, sexo, edad, credo, discapacidad o estado de ingresos. MPO SNHPC reuniones se llevan a cabo en lugares

accesibles y razonables se hacen para las personas con discapacidad que lo soliciten dentro de un plazo de preaviso razonable (generalmente dos semanas o 10 días hábiles). Si desea alojamiento accesibilidad o el idioma para las reuniones MPO SNHPC, por favor póngase en contacto con el administrador de la oficina de SNHPC en 603-669-4664 o por correo electrónico: lmoore-o'brien@snhpc.org.

Si usted siente que ha sido discriminado por su raza, color, origen nacional, sexo, edad, credo, discapacidad o estado de ingresos, usted puede presentar una queja siguiendo la forma MPO SNHPC queja del Título VI. Si usted no puede descargar el documento o necesita información adicional, por favor no dude en ponerse en contacto con la Comisión de Planificación en Southern New Hampshire, 603-669-4664.

3.4 Requirement to Develop Title VI Complaint Procedures and Complaint Form

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

A copy of the SNHPC MPO's Title VI Complaint and Investigation Procedures and Title VI Complaint Form is included in Appendix C of this document. The SNHPC MPO Title VI Coordinator is Linda Moore-O'Brien, Office Administrator, Southern New Hampshire Planning Commission, 438 Dubuque Street, Manchester, NH 03102.

3.5 Requirement to Record and Report Title VI Investigations, Complaints, and Lawsuits

In compliance with 49 CFR Section 21.9(b), the SNHPC MPO and all sub-recipients shall prepare and maintain a list of any active investigations conducted by entities other than the FTA or FHWA, lawsuits, or complaints naming the SNHPC MPO or sub-recipient alleging discrimination on the basis of race, color, national origin, sex, creed, disability or income status. This list shall include the date the investigation, lawsuit, or complaint was filed and received by the MPO, a summary of the allegation(s), the status of the investigation, lawsuit or complaint, and actions taken by the MPO or sub-recipient in response to the investigation, lawsuit, or complaint.

The SNHPC MPO's form for recording this information is included in Appendix C of this document. 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.

The Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) was designated by Governor Meldrim Thomson on December 31, 1973. Since the designation of the MPO, there have been no Title VI complaints, investigations, or lawsuits filed against the MPO.

3.6 Requirement to Promote Inclusive Public Participation

The content and considerations of Title VI, the Executive Order on Limited English Proficiency (LEP), and the DOT LEP Guidance are integrated into the Public Involvement Process for the SNHPC Region, which is incorporated into the SNHPC MPO Prospectus, last updated on September 27, 2011.

Public participation is vital to the SNHPC MPO. It helps provide the MPO the broadest spectrum of relevant information available prior to its decision-making and offers the public an opportunity to raise concerns that can be considered along with discussion of technical, political and economic merit.

Of particular importance in the pursuit of public participation is the identification of audiences which would be affected by or have a business or other affinity with the issues under consideration. All views should be heard and their participation likewise encouraged. In this context, minority views include not only ethnic groups but also others whose perspectives may not be fully reflected by larger segments of the public.

Through the regional planning process, the MPO and partner agencies will thoroughly analyze the three federally-established fundamental environmental justice principles:

- To avoid, minimize or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, of programs, policies and activities on minority populations and low-income populations;
- To ensure full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction of, or significant delay in the receipt of transportation benefits by minority and low-income populations.

The MPO actively seeks to solicit the comments and engage the interests of the public through the participation process. It then is the responsibility of the MPO and the NH Department of Transportation to balance the public's needs and desires with resources available to address those needs and desires.

MPO Staff are directed to incorporate appropriate activities to make public communications and outreach a part of the agency's overall planning activities. In addition to required public hearings, such activities may include: representative task forces or advisory committees; public meetings and workshops, presentations and discussions with special interest organizations,

forums or conferences that provide information about issues and processes and the opportunity for input from the public; opinion polls, surveys, focus groups and interviews to acquire information; and use of the media and reports to disseminate information.

Specific outreach efforts designed to gather input on the needs of underrepresented populations in the SNHPC MPO region in recent years include, though are not limited to, the following:

- Surveys of municipal human service directors regarding the transportation needs of residents in their communities who have sought assistance, or other community members who may not seek assistance but nonetheless have unmet transportation needs.
- Surveys of regional non-profit health and human service agencies regarding the transportation needs of the client populations with whom they work.
- Surveys of riders of Manchester Transit Authority (MTA) and the Greater Derry-Salem Cooperative Alliance for Regional Transportation (CART), the two regional public transit systems serving portions of the SNHPC MPO region.
- Ongoing participation in and technical assistance to the two Regional Coordinating Councils for Community Transportation (RCCs) that serve portions of the SNHPC MPO planning region. These include the Region 9 (Greater Derry-Salem) RCC, serving four communities in the eastern part of the MPO region; and Region 8 (Greater Manchester) RCC, serving eight communities in the MPO region. These councils are made up of public and private organizations that provide transportation services for transit dependent populations, purchase these services, or otherwise work with populations likely to need these services. Each of these RCCs also engages citizen members, including individuals with disabilities who are regular users of public transit.
- Finally, as part of our joint work with the eight other RPCs around New Hampshire on the Granite State Future initiative, we have partnered with New Hampshire Listens on a series of focus group meetings targeting traditionally underserved populations. These included groups such as immigrant and refugee populations, low income residents, individuals with disabilities, senior citizens, and youth. We have consulted with NH Catholic Charities and Ascentia Care Network (formerly Lutheran Social Services), the two primary agencies that work with immigrant populations in the state, to enlist their assistance in outreach to engage members of these communities in the development of the SNHPC MPO Metropolitan Long Range Transportation Plan. The largest minority and immigrant populations in New Hampshire are largely concentrated in the cities of Nashua, Manchester and Concord.

The SNHPC MPO seeks to reduce or eliminate language, mobility, temporal, and other obstacles that may prevent minority, disability, low-income and other under-represented populations from fully participating in the metropolitan planning process. It is the policy of the MPO to locate all public meetings in facilities that are structurally accessible. Meetings of the MPO Technical Advisory Committee and the MPO Policy Committee are held during the day at the Southern New Hampshire Planning Commission offices, which are ADA accessible as well as accessible

by the Manchester Transit Authority's public transit services.

3.7 Requirement to Develop a Demographic Profile of the Metropolitan Area

The SNHPC MPO has prepared a demographic analysis of minority and low income populations for the fourteen (14) communities that currently make up the MPO planning region. Data on the racial and ethnic makeup of the region, low-income population, and Limited English Proficiency (LEP) population were drawn from the American Community Survey (ACS) 2011-2015 five-year data compilation.

Note that there are significant concerns regarding the ACS data, which represent a much smaller survey sample, even with a five-year compilation, than the former Census Long Form, from which information on income and poverty have previously been drawn. While the ACS data provide useful annual snapshots at the national, state and county levels, they contain high margins of error for smaller towns (in some cases in excess of 100 percent), and especially for small sub-populations within towns. However, the ACS data represents the best data available for regional demographic measures since the 2010 Census.

Minority Population

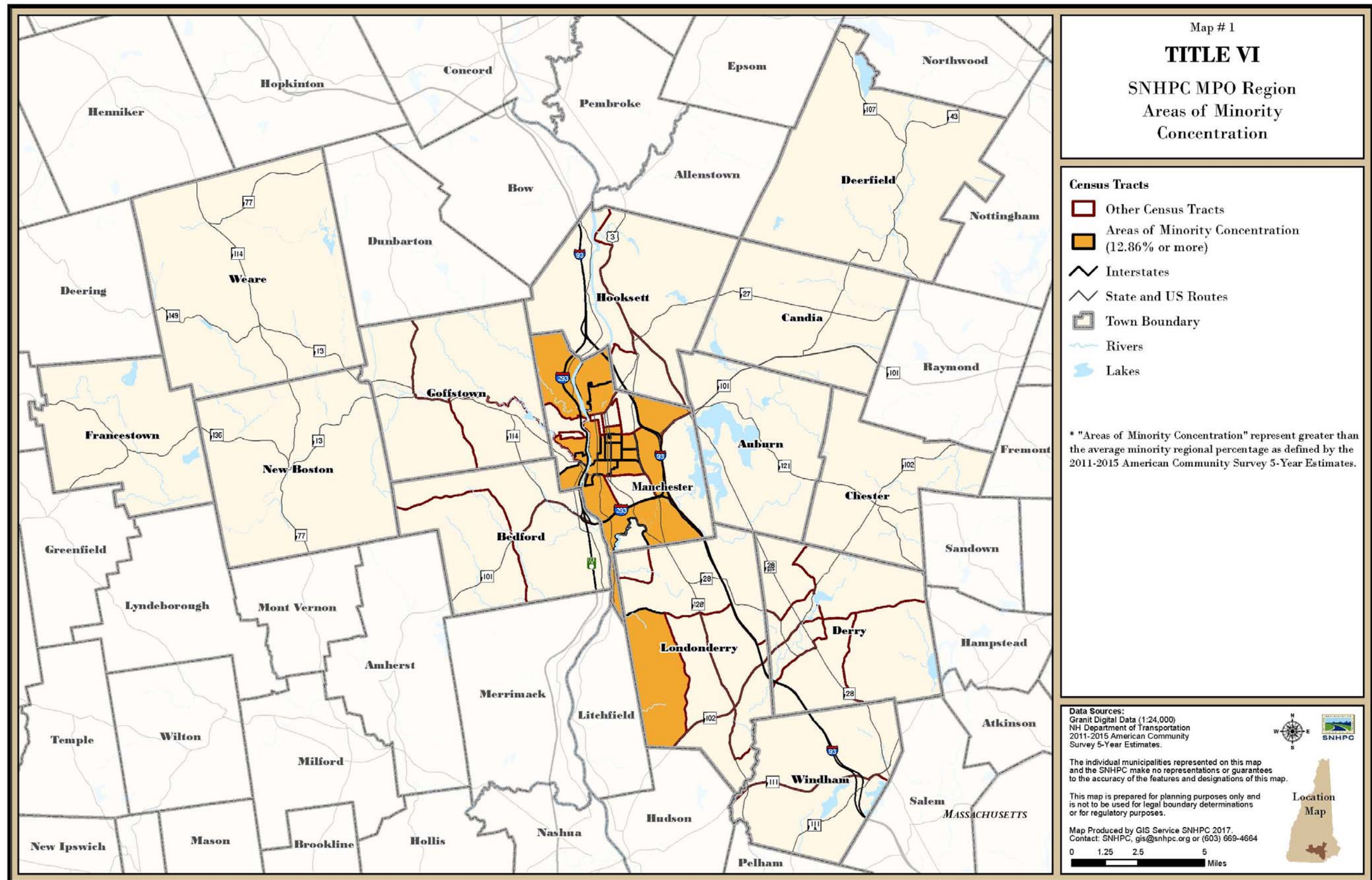
Table 1 identifies the number of racial and ethnic minority residents for each municipality in the MPO region, for every census tract in the MPO region, as well as minority residents as a percentage of overall population. In the SNHPC MPO region, minorities make up approximately 12.85% of the population. This average is exceeded in one (1) census tract in Londonderry, twenty (20) census tracts in the City of Manchester, and in the City of Manchester as a whole. Statewide, members of racial and ethnic minority groups make up 8.9 percent of the population. This is a significant increase since the 2000 census, when racial and ethnic minorities made up only 5.6 percent of the population statewide.

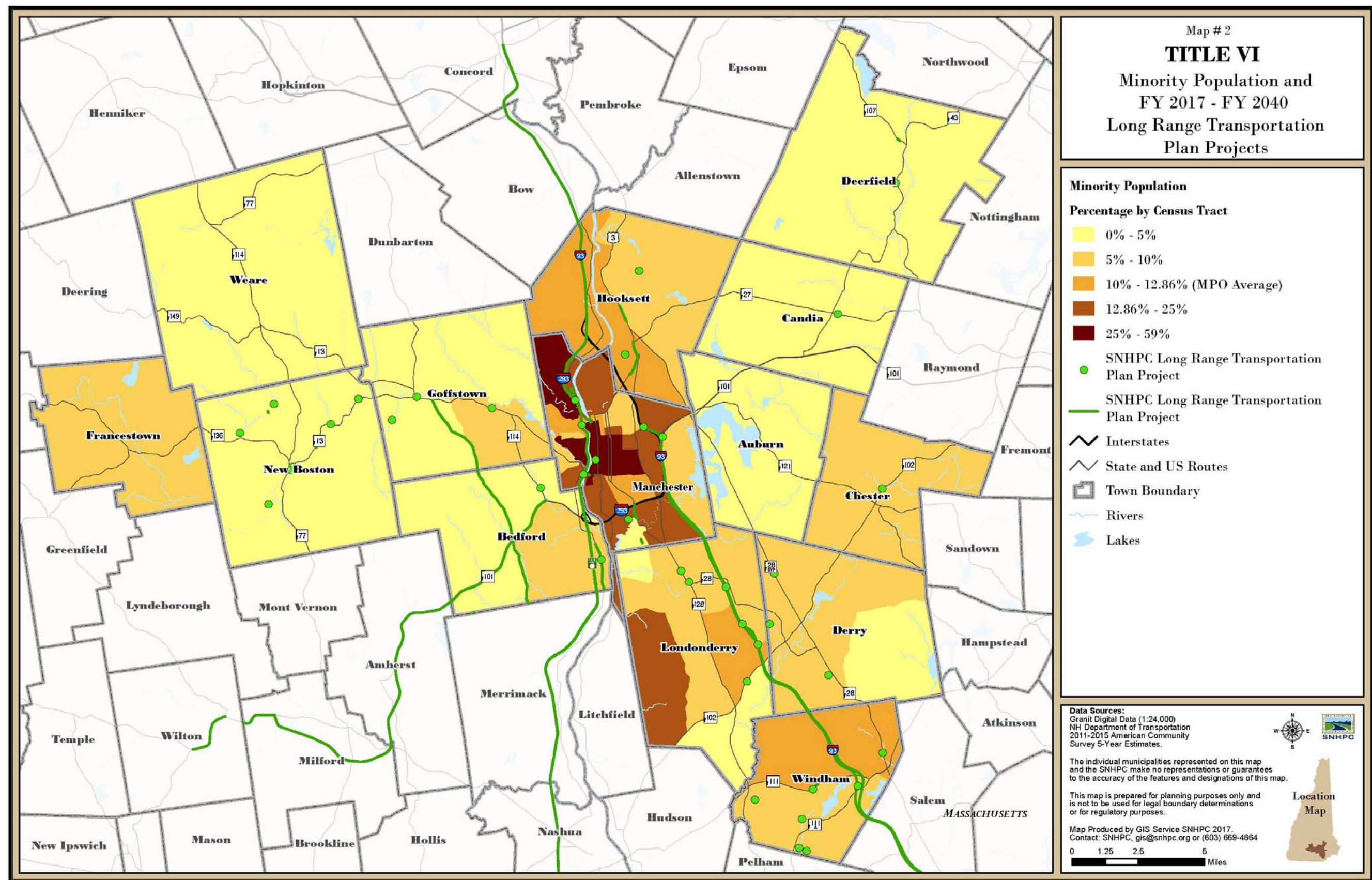
Map 1 shows where there is a concentration of minority populations at the census tract level, defined as those census tracts where the minority population exceeds the regional average of 12.85% of the population.

Map 2 shows minority population as a percentage of total population, together with projects identified in the MPO 2017-2040 Long Range Transportation Plan. The highest concentrations of minority populations in the region are in Manchester, southeast of Queen City Bridge and FE Everett Turnpike (I-293). The distribution of approved Long Range Transportation projects does not suggest that communities with larger minority populations are subject to a disproportionate share of either benefits or adverse impacts from transportation projects.

Table 1 - Minority Populations in the SNHPC MPO Region
(Source: 2011-2015 American Community Survey 5-Year Estimates)

Census Tract	Community	Total Population	Black	American Indian/ Alaskan	Asian	Hawaiian/ Pacific Islander	Other Race	2+ Races	Hispanic/ Latino	Total Minority Population	Percentage Minority
40	Auburn	5,141	0	14	59	0	11	53	96	233	4.5%
29.01	Bedford	7,289	190	19	291	0	18	34	92	644	8.8%
29.02	Bedford	6,178	96	0	36	0	0	24	81	237	3.8%
29.03	Bedford	8,192	0	0	158	0	0	57	126	341	4.2%
500	Candia	3,913	0	0	95	0	0	23	9	127	3.2%
510	Chester	4,825	36	0	34	0	27	102	104	303	6.3%
560	Deerfield	4,349	27	0	8	0	0	7	33	75	1.7%
33.01	Derry	4,569	0	13	82	0	50	41	101	287	6.3%
33.02	Derry	4,983	22	0	96	0	127	8	178	431	8.6%
34	Derry	5,729	128	0	45	0	19	46	129	367	6.4%
35	Derry	5,431	35	10	12	0	12	71	192	332	6.1%
36.01	Derry	7,011	147	0	149	0	0	51	93	440	6.3%
36.02	Derry	5,479	0	0	63	0	29	21	47	160	2.9%
215	Francestown	4,700	27	13	0	0	21	152	78	291	6.2%
27.01	Goffstown	3,673	0	10	13	0	0	76	32	131	3.6%
27.02	Goffstown	6,077	30	0	0	0	0	53	129	212	3.5%
28	Goffstown	8,081	182	5	27	0	56	70	283	623	7.7%
30.01	Hooksett	4,072	116	4	17	0	0	114	234	485	11.9%
30.06	Hooksett	3,852	19	0	8	0	53	22	334	436	11.3%
442	Hooksett	5,913	26	0	229	0	0	96	189	540	9.1%
37.01	Londonderry	3,307	69	0	22	0	47	44	193	375	11.3%
37.03	Londonderry	5,392	122	0	30	0	34	36	60	282	5.2%
38.01	Londonderry	3,928	0	0	52	0	70	9	125	256	6.5%
38.02	Londonderry	4,514	66	0	31	0	11	25	452	585	13.0%
39.02	Londonderry	3,350	14	0	0	0	0	24	4	42	1.3%
1.01	Manchester	2,837	61	29	71	0	35	68	108	372	13.1%
1.02	Manchester	5,085	176	7	495	0	21	40	125	864	17.0%
2.02	Manchester	2,358	91	6	6	0	8	96	73	280	11.9%
2.03	Manchester	3,133	133	0	133	0	0	105	53	424	13.5%
2.04	Manchester	5,000	362	0	732	0	34	133	362	1,623	32.5%
3	Manchester	2,775	0	14	47	0	12	7	143	223	8.0%
6	Manchester	2,005	71	0	32	0	0	31	69	203	10.1%
7	Manchester	3,054	38	0	55	0	0	21	69	183	6.0%
8	Manchester	2,719	145	7	34	0	12	160	161	519	19.1%
9.01	Manchester	3,414	201	0	0	0	0	0	104	305	8.9%
9.02	Manchester	6,065	491	19	442	0	18	112	387	1,469	24.2%
10	Manchester	5,798	0	0	275	0	37	90	116	518	8.9%
11	Manchester	5,428	349	0	67	0	29	57	198	700	12.9%
12	Manchester	1,819	9	0	5	0	12	14	207	247	13.6%
13	Manchester	2,926	209	0	37	0	136	103	667	1,152	39.4%
14	Manchester	2,248	334	42	92	0	151	46	419	1,084	48.2%
15	Manchester	2,835	390	0	172	4	232	74	802	1,674	59.0%
16	Manchester	4,735	324	8	636	0	182	114	1,000	2,264	47.8%
17	Manchester	2,251	34	0	0	0	0	0	753	787	35.0%
18	Manchester	5,686	217	0	147	0	162	329	573	1,428	25.1%
19	Manchester	3,044	211	5	227	0	144	53	582	1,222	40.1%
20	Manchester	2,071	189	0	269	0	60	108	273	899	43.4%
21	Manchester	4,967	275	8	192	0	164	100	653	1,392	28.0%
22	Manchester	3,395	10	0	8	0	40	29	242	329	9.7%
23	Manchester	3,537	200	0	109	0	32	54	125	520	14.7%
24	Manchester	7,369	842	0	235	0	41	102	465	1,685	22.9%
25	Manchester	5,198	113	0	99	0	0	201	216	629	12.1%
26	Manchester	5,786	1	0	392	0	0	149	317	859	14.8%
2004	Manchester	2,601	172	33	20	0	42	126	362	755	29.0%
200	New Boston	5,418	0	0	0	0	8	0	40	48	0.9%
210	Weare	8,883	17	0	48	0	20	236	107	428	4.8%
1061	Windham	7,483	0	0	476	0	0	168	140	784	10.5%
1061	Windham	6,621	54	0	135	0	0	176	63	428	6.5%
	MPO Region	268,492	7,071	266	7,245	4	2,217	4,361	13,368	34,532	12.9%





Low Income Populations

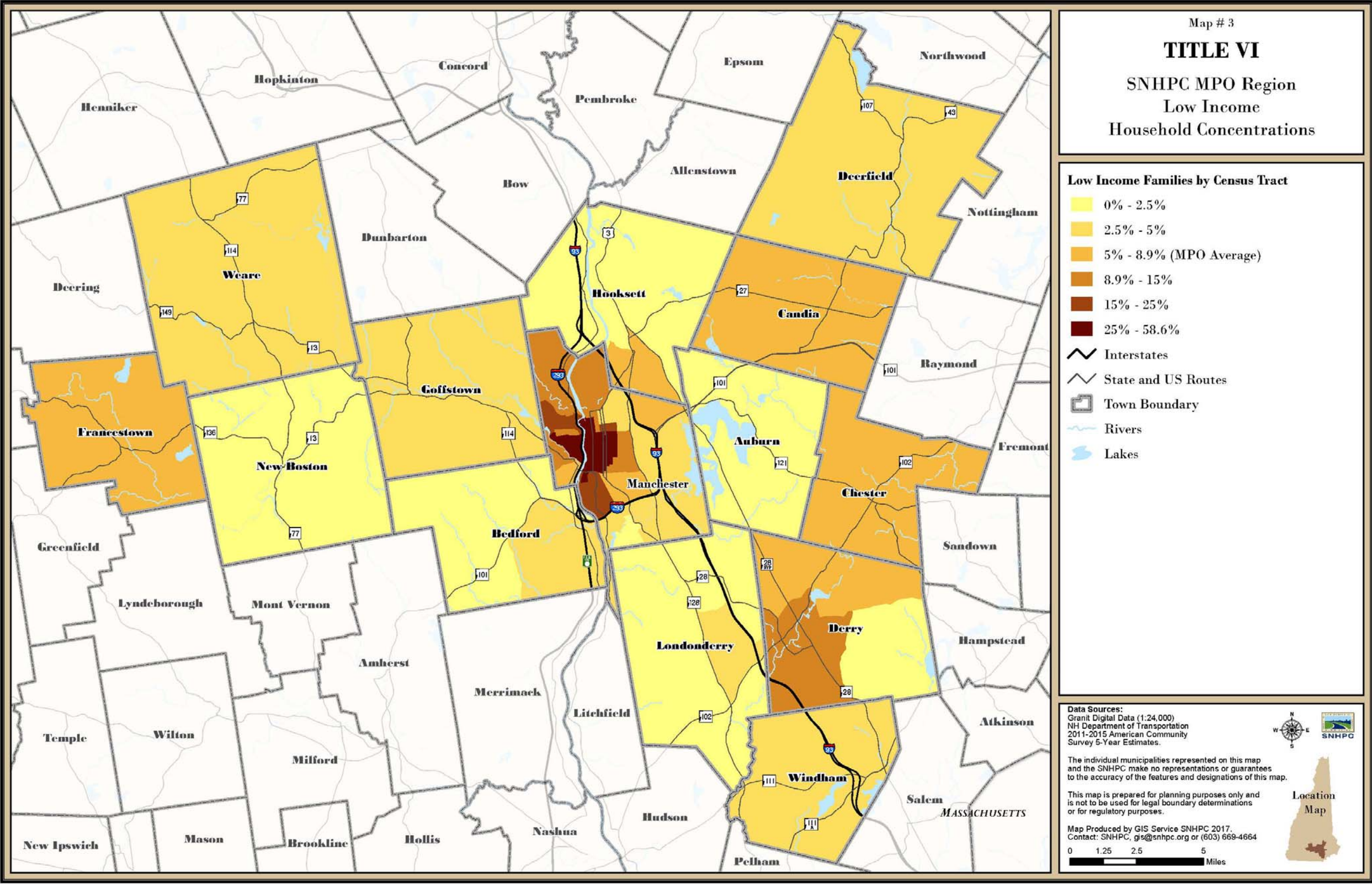
Table 2 on the following page utilizes 2011-2015 American Community Survey 5-Year Estimates to show the number and percentage of the population in poverty by both census tract and municipality in the SNHPC MPO Region. The mean percentage of persons in poverty in the SNHPC MPO Region is 8.9%. This average is exceeded in three (3) census tracts in the Town Derry, twenty-one (21) census tracts in the City of Manchester, and in the City of Manchester as a whole.

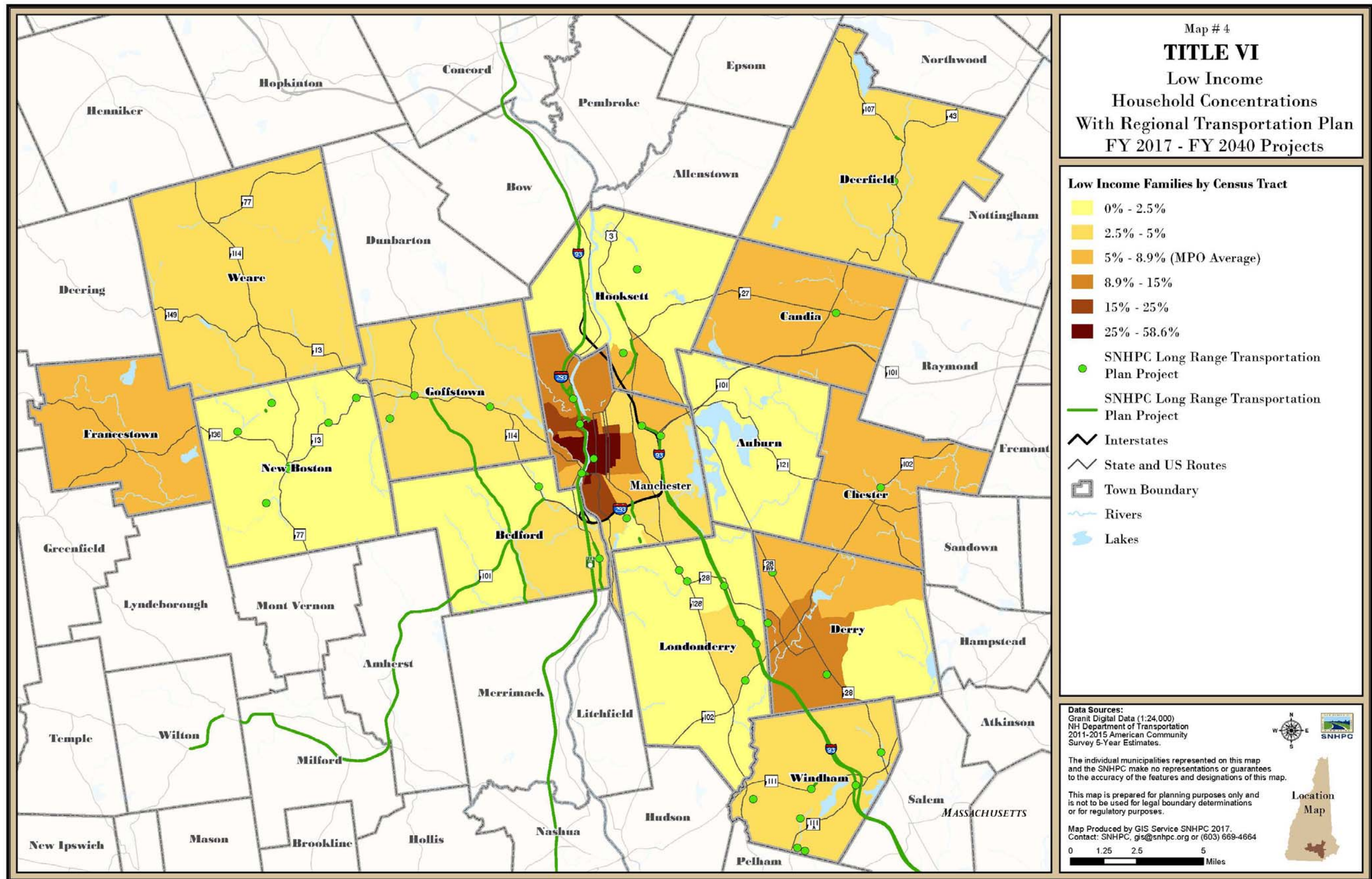
Map 3 illustrates those census tracts within the SNHPC region with a concentration of low income households, defined as those census tracts that exceed the MPO average of 8.9%.

Map 4 shows the low income population as a percentage of total population, together with projects identified in the MPO 2017-2040 Long Range Transportation Plan. The distribution of approved Long Range Transportation projects does not suggest that areas with larger low income populations are subject to a disproportionate share of either benefits or adverse impacts from transportation projects.

Table 2 – Low Income Populations in the SNHPC MPO Region
(Source: 2011-2015 American Community Survey 5-Year Estimates)

Census Tract	Community	Total Population	Below 50% of Poverty Level	Below 125% of Poverty Level	Below 150% of Poverty Level	Below 200% of Poverty Level	Below Poverty Level	Percentage Below Poverty Level
40	Auburn	5,140	90	158	199	432	127	2.5%
29.01	Bedford	7,169	207	362	439	667	299	4.2%
29.02	Bedford	5,739	97	129	204	608	129	2.2%
29.03	Bedford	8,192	15	51	92	545	15	0.2%
500	Candia	3,907	135	238	336	412	209	5.3%
510	Chester	1,140	204	275	345	581	99	8.7%
560	Deerfield	938	71	285	326	534	34	3.6%
33.01	Derry	4,569	63	307	404	584	244	5.3%
33.02	Derry	4,983	57	466	503	707	291	5.8%
34	Derry	5,540	139	703	834	1,939	543	9.8%
35	Derry	5,431	413	832	1,088	1,538	568	10.5%
36.01	Derry	6,978	436	949	1,101	1,431	824	11.8%
36.02	Derry	5,450	41	144	274	503	128	2.3%
215	Francestown	4,697	133	386	497	807	311	6.6%
27.01	Goffstown	3,673	32	253	288	696	171	4.7%
27.02	Goffstown	6,039	78	425	551	962	271	4.5%
28	Goffstown	3,340	170	689	765	1,133	103	3.1%
30.01	Hooksett	3,735	39	179	224	349	84	2.2%
30.06	Hooksett	3,428	78	291	310	474	190	5.5%
442	Hooksett	5,913	57	219	490	812	100	1.7%
37.01	Londonderry	3,307	67	186	267	400	155	4.7%
37.03	Londonderry	5,392	16	262	461	907	91	1.7%
38.01	Londonderry	2,403	26	105	127	258	26	1.1%
38.02	Londonderry	4,514	48	90	108	148	81	1.8%
39.02	Londonderry	3,350	15	57	89	259	57	1.7%
1.01	Manchester	2,829	144	280	319	447	280	9.9%
1.02	Manchester	4,295	457	617	693	835	586	13.6%
2.02	Manchester	2,328	134	513	657	711	413	17.7%
2.03	Manchester	3,133	154	551	741	1,001	359	11.5%
2.04	Manchester	4,945	196	1,126	1,406	1,870	657	13.3%
3	Manchester	2,753	58	542	718	1,067	302	11.0%
6	Manchester	1,900	154	281	336	458	241	12.7%
7	Manchester	3,005	7	182	227	470	139	4.6%
8	Manchester	2,420	178	525	778	966	449	18.6%
9.01	Manchester	3,375	58	261	421	564	165	4.9%
9.02	Manchester	6,065	54	789	970	1,537	542	8.9%
10	Manchester	5,481	47	492	714	902	254	4.6%
11	Manchester	5,330	72	272	317	627	181	3.4%
12	Manchester	1,711	105	199	301	543	171	10.0%
13	Manchester	2,926	303	901	1,116	1,494	824	28.2%
14	Manchester	2,176	334	1,042	1,275	1,507	853	39.2%
15	Manchester	2,813	525	1,423	1,571	1,963	1,157	41.1%
16	Manchester	4,717	587	1,735	2,051	2,650	1,458	30.9%
17	Manchester	2,251	34	652	796	998	298	13.2%
18	Manchester	5,650	154	1,073	1,384	2,131	845	15.0%
19	Manchester	2,563	340	925	1,149	1,257	851	33.2%
20	Manchester	2,071	393	828	1,039	1,256	649	31.3%
21	Manchester	4,967	573	1,453	1,770	2,479	1,268	25.5%
22	Manchester	3,370	102	656	701	1,052	407	12.1%
23	Manchester	3,494	89	273	406	546	216	6.2%
24	Manchester	7,329	676	1,815	2,355	2,505	1,260	17.2%
25	Manchester	5,198	180	648	765	1,065	357	6.9%
26	Manchester	5,785	43	283	413	1,040	177	3.1%
2004	Manchester	2,567	285	899	1,059	1,163	728	28.4%
200	New Boston	5,418	55	151	210	646	109	2.0%
210	Weare	8,883	161	374	664	1,369	360	4.1%
1061.01	Windham	7,452	187	324	348	417	323	4.3%
1061.02	Windham	6,621	78	251	390	517	210	3.2%
	SNHPC Region	250,788	9,644	30,377	38,382	55,739	22,239	8.9%





3.8 Requirement to Provide Meaningful Access to LEP Persons

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), the SNHPC MPO will take responsible steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who have Limited English Proficiency (LEP).

The following pages describe the four-part analysis of LEP populations described in the Federal Transit Administration guidance entitled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers", prepared by the FTA Office of Civil Rights. These steps include: (1) identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; (2) determining the frequency with which LEP individuals come in contact with the program; (3) defining the nature and importance of the program, activity, or service provided by the recipient to people's lives; and (4) describing the resources available to the recipient and costs.

Identify the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;

The SNHPC MPO has undertaken an analysis of the languages spoken in its 14 municipalities planning region, and the estimated number of residents with Limited English Proficiency and their distribution by language group and census tract.

Table 3 shows data taken from the 2011-2015 American Community Survey 5-Year Estimates for primary language spoken at home for the MPO planning region. This table summarizes the most common languages spoken at home in the region, with a threshold of 0.05% of households.

The federal interagency website on Limited English Proficiency (LEP) (www.lep.gov) states: Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.

Based on this definition, a total of 10,071 individuals in the SNHPC MPO planning region, or 4.0 percent of total population, would be identified as having Limited English Proficiency. Divided among language groups, this includes 3,318 Spanish speakers (1.3 percent of total population), 4,025 speakers of Other Indo-European Languages (1.6 percent of total population), 1,746 speakers of Asian and Pacific Languages (0.7 percent of total population), and 982 speakers of Other Languages (0.4 percent of total population).

Table 3 – Limited English Proficiency Populations in the SNHPC MPO Region
(Source: 2011-2015 American Community Survey 5-Year Estimates)

Census Tract	Community	Population (5 yrs +)	English Only	English Only %	Spanish	LEP Spanish	LEP Spanish %	Other Indo-Europe	LEP Indo-Europe	LEP Indo-Europe %	Asian Pacific	LEP Asian Pacific	LEP Asian Pacific %	Other Languages	LEP Other Languages	LEP Other Languages %	Total LEP	LEP %
40	Auburn	4,944	4,672	94.5%	129	0	0.0%	93	16	0.3%	40	0	0.0%	10	0	0.0%	16	0.3%
29.01	Bedford	6,997	6,202	88.6%	41	23	0.3%	554	45	0.6%	177	62	0.9%	23	0	0.0%	130	1.9%
29.02	Bedford	5,856	5,555	94.9%	60	0	0.0%	241	0	0.0%	0	0	0.0%	0	0	0.0%	0	0.0%
29.03	Bedford	7,644	7,181	93.9%	112	0	0.0%	205	80	1.0%	119	35	0.5%	27	0	0.0%	115	1.5%
500	Candia	3,787	3,485	92.0%	3	3	0.1%	175	28	0.7%	95	0	0.0%	29	0	0.0%	31	0.8%
510	Chester	4,523	4,283	94.7%	108	0	0.0%	73	0	0.0%	59	0	0.0%	0	0	0.0%	0	0.0%
560	Deerfield	4,157	3,899	93.8%	110	17	0.4%	148	7	0.2%	0	0	0.0%	0	0	0.0%	24	0.6%
33.01	Derry	4,424	4,106	92.8%	57	27	0.6%	140	0	0.0%	121	50	1.1%	0	0	0.0%	77	1.7%
33.02	Derry	4,727	4,381	92.7%	106	31	0.7%	163	34	0.7%	77	77	1.6%	0	0	0.0%	142	3.0%
34	Derry	5,448	5,041	92.5%	27	0	0.0%	328	109	2.0%	24	0	0.0%	28	15	0.3%	124	2.3%
35	Derry	5,156	4,914	95.3%	119	0	0.0%	99	52	1.0%	0	0	0.0%	24	12	0.2%	64	1.2%
36.01	Derry	6,738	6,472	96.1%	62	38	0.6%	55	0	0.0%	149	51	0.8%	0	0	0.0%	89	1.3%
36.02	Derry	5,240	5,103	97.4%	18	18	0.3%	57	13	0.2%	46	27	0.5%	16	9	0.2%	67	1.3%
215	Francestown	4,446	4,320	97.2%	57	15	0.3%	55	19	0.4%	7	0	0.0%	7	0	0.0%	34	0.8%
27.01	Goffstown	3,462	3,327	96.1%	34	0	0.0%	51	0	0.0%	50	50	1.4%	0	0	0.0%	50	1.4%
27.02	Goffstown	5,692	5,429	95.4%	13	0	0.0%	233	71	1.2%	0	0	0.0%	17	0	0.0%	71	1.2%
28	Goffstown	7,737	7,026	90.8%	103	28	0.4%	586	206	2.7%	4	4	0.1%	18	0	0.0%	238	3.1%
30.01	Hooksett	3,872	3,668	94.7%	94	0	0.0%	100	5	0.1%	10	0	0.0%	0	0	0.0%	5	0.1%
30.06	Hooksett	3,665	3,300	90.0%	125	0	0.0%	190	39	1.1%	50	8	0.2%	0	0	0.0%	47	1.3%
442	Hooksett	5,511	5,136	93.2%	35	0	0.0%	285	69	1.3%	55	55	1.0%	0	0	0.0%	124	2.3%
37.01	Londonderry	3,197	2,966	92.8%	118	37	1.2%	74	0	0.0%	22	22	0.7%	17	8	0.3%	67	2.1%
37.03	Londonderry	5,199	4,811	92.5%	82	18	0.3%	279	73	1.4%	27	0	0.0%	0	0	0.0%	91	1.8%
38.01	Londonderry	3,788	3,670	96.9%	57	26	0.7%	61	0	0.0%	0	0	0.0%	0	0	0.0%	26	0.7%
38.02	Londonderry	4,251	3,908	91.9%	207	47	1.1%	136	8	0.2%	0	0	0.0%	0	0	0.0%	55	1.3%
39.02	Londonderry	3,227	3,167	98.1%	4	4	0.1%	56	0	0.0%	0	0	0.0%	0	0	0.0%	4	0.1%
1.01	Manchester	2,635	2,366	89.8%	75	7	0.3%	124	23	0.9%	49	18	0.7%	21	0	0.0%	48	1.8%
1.02	Manchester	4,969	4,085	82.2%	114	44	0.9%	335	54	1.1%	420	236	4.7%	15	8	0.2%	342	6.9%
2.02	Manchester	2,233	1,917	85.8%	58	58	2.6%	254	41	1.8%	0	0	0.0%	4	4	0.2%	103	4.6%
2.03	Manchester	3,019	2,591	85.8%	26	14	0.5%	281	34	1.1%	86	0	0.0%	35	9	0.3%	57	1.9%
2.04	Manchester	4,688	3,307	70.5%	136	46	1.0%	822	328	7.0%	242	60	1.3%	181	99	2.1%	533	11.4%
3	Manchester	2,578	2,131	82.7%	118	69	2.7%	292	39	1.5%	22	22	0.9%	15	7	0.3%	137	5.3%
6	Manchester	1,901	1,657	87.2%	69	0	0.0%	121	23	1.2%	54	15	0.8%	0	0	0.0%	38	2.0%
7	Manchester	2,857	2,642	92.5%	34	8	0.3%	139	55	1.9%	42	0	0.0%	0	0	0.0%	63	2.2%
8	Manchester	2,460	2,019	82.1%	133	0	0.0%	284	103	4.2%	4	0	0.0%	20	0	0.0%	103	4.2%
9.01	Manchester	3,262	2,975	91.2%	122	75	2.3%	159	70	2.1%	0	0	0.0%	6	0	0.0%	145	4.4%

Census Tract	Community	Population (5 yrs +)	English Only	English Only %	Spanish	LEP Spanish	LEP Spanish %	Other Indo-Europe	LEP Indo-Europe	LEP Indo-Europe %	Asian Pacific	LEP Asian Pacific	LEP Asian Pacific %	Other Languages	LEP Other Languages	LEP Other Languages %	Total LEP	LEP %
9.02	Manchester	5,448	4,485	82.3%	256	68	1.2%	276	89	1.6%	328	78	1.4%	103	0	0.0%	235	4.3%
10	Manchester	5,406	4,855	89.8%	82	0	0.0%	326	57	1.1%	143	78	1.4%	0	0	0.0%	135	2.5%
11	Manchester	5,270	4,330	82.2%	210	90	1.7%	473	249	4.7%	0	0	0.0%	257	96	1.8%	435	8.3%
12	Manchester	1,782	1,498	84.1%	145	15	0.8%	129	6	0.3%	10	0	0.0%	0	0	0.0%	21	1.2%
13	Manchester	2,790	2,097	75.2%	460	312	11.2%	114	4	0.1%	0	0	0.0%	119	118	4.2%	434	15.6%
14	Manchester	2,158	1,296	60.1%	367	179	8.3%	366	202	9.4%	4	0	0.0%	125	86	4.0%	467	21.6%
15	Manchester	2,528	1,470	58.1%	560	411	16.3%	382	201	8.0%	0	0	0.0%	116	98	3.9%	710	28.1%
16	Manchester	4,286	2,787	65.0%	755	242	5.6%	447	199	4.6%	297	206	4.8%	0	0	0.0%	647	15.1%
17	Manchester	2,100	1,472	70.1%	479	224	10.7%	142	29	1.4%	0	0	0.0%	7	0	0.0%	253	12.0%
18	Manchester	5,275	4,284	81.2%	357	97	1.8%	484	193	3.7%	87	87	1.6%	63	0	0.0%	377	7.1%
19	Manchester	2,718	1,991	73.3%	484	247	9.1%	191	48	1.8%	47	47	1.7%	5	0	0.0%	342	12.6%
20	Manchester	1,941	1,344	69.2%	212	109	5.6%	359	204	10.5%	0	0	0.0%	26	0	0.0%	313	16.1%
21	Manchester	4,682	3,713	79.3%	475	166	3.5%	330	148	3.2%	91	35	0.7%	73	37	0.8%	386	8.2%
22	Manchester	3,243	2,885	89.0%	61	27	0.8%	289	43	1.3%	8	0	0.0%	0	0	0.0%	70	2.2%
23	Manchester	3,380	2,823	83.5%	37	37	1.1%	318	71	2.1%	93	71	2.1%	109	59	1.7%	238	7.0%
24	Manchester	7,066	5,328	75.4%	278	124	1.8%	782	302	4.3%	111	43	0.6%	567	317	4.5%	786	11.1%
25	Manchester	4,919	4,334	88.1%	36	0	0.0%	438	162	3.3%	99	59	1.2%	12	0	0.0%	221	4.5%
26	Manchester	5,666	4,864	85.8%	302	104	1.8%	190	1	0.0%	285	238	4.2%	25	0	0.0%	343	6.1%
2004	Manchester	2,491	2,128	85.4%	168	102	4.1%	174	45	1.8%	9	0	0.0%	12	0	0.0%	147	5.9%
200	New Boston	5,080	4,796	94.4%	91	22	0.4%	193	10	0.2%	0	0	0.0%	0	0	0.0%	32	0.6%
210	Weare	8,389	8,093	96.5%	105	57	0.7%	191	65	0.8%	0	0	0.0%	0	0	0.0%	122	1.5%
1061.01	Windham	7,133	6,689	93.8%	88	0	0.0%	127	0	0.0%	216	12	0.2%	13	0	0.0%	12	0.2%
1061.02	Windham	6,238	5,815	93.2%	47	32	0.5%	251	53	0.8%	46	0	0.0%	79	0	0.0%	85	1.4%
	SNHPC Region	254,279	225,089	88.5%	8,821	3,318	1.3%	14,220	4,025	1.6%	3,925	1,746	0.7%	2,224	982	0.4%	10,071	4.0%

Determine the frequency with which LEP individuals come in contact with the program

Key points of contact between the MPO and members of the public in the MPO region include the following: public hearings, other public meetings, the MPO website, inquiries with the MPO office and staff regarding local or regional project needs, and local or regional surveys designed to gather information to inform decision making.

During the past ten years there have been no inquiries with MPO staff by residents of the region regarding the availability of interpretation services for meetings, or documents in translation to other languages to benefit LEP individuals.

Define the nature and importance of the program, activity, or service provided by the recipient to people's lives

An MPO's regional planning activities impact every person in the MPO region to one degree or another. Projects reviewed by the MPO and recommended to NHDOT for funding impact the safety and travel time for all members of the driving public. Similarly, the MPO works to develop regional coordinated public transit and human service transportation plans helps to address mobility and access needs for a range of transit dependent populations, which may include LEP persons as well as seniors, individuals with disabilities, youth and the general low income population.

Describe the resources available to the recipient and costs

The SNHPC MPO has consulted with several agencies to identify common practices in New Hampshire for working with LEP populations, including the NH Department of Transportation, The International Institute of New Hampshire in Manchester (IINH), The New Hampshire Catholic Charities Immigration Office, MTA, Manchester Health Department, and Greater Derry Community Health Services (CHS). Based on these contacts the MPO is exploring costs for commercial telephonic interpretation services identified by NHDOT. The MPO has also identified interpretation services available through the Southern NH Area Health Education Center, used by CHS for medical interpretation. The Uniform Planning Work Program (UPWP) would be the main source of financial resources available to the MPO for expanding language access. The MPO is in the process of developing cost estimates for on-call interpretation services as well as document translation. The MPO is in the process of updating its website and plans to incorporate Google Translate technology. We anticipate that web-based technologies such as Google Translate will make the costs of document translation relatively modest. Live interpretation services are anticipated to be more costly.

USDOT LEP Guidance identifies 1,000 individuals or 5 percent of the population eligible to be served falling within a specific LEP language group as a threshold above which vital documents should be provided in translation. Based on the 2011-2015 American Community Survey 5-Year Estimates for primary language , the MPO is in the process of developing an LEP Language Implementation Plan to identify strategies for expanding access to language assistance as well as key MPO documents for LEP individuals, with an emphasis on the Spanish speaking population.

3.9 Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 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.”

The key advisory and policy-making bodies for the MPO are the MPO Technical Advisory Committee (TAC) and the MPO Policy Committee. The TAC is made up of representatives from each MPO community plus representatives of State and Federal agencies, and Manchester-Boston Regional Airport, MTA and CART. The Policy Committee is similarly made up of Commissioners to the SNHPC appointed by each member community, representatives of State and Federal agencies, representatives of the Manchester-Boston Regional Airport, the MTA and CART. The individuals representing each of these municipalities or agencies are selected by those entities, and are not chosen at the discretion of the MPO or its staff. Full membership of the MPO TAC and Policy Committees is detailed in Appendix D.

3.10 Providing Assistance to Sub-recipients

The SNHPC MPO is itself a sub-recipient of Federal assistance, with the NH Department of Transportation serving as the primary recipient and passing through FTA Section 5305(d) and FHWA metropolitan planning funding to the region.

The SNHPC MPO acts as the Lead Agency for the administration of FTA Section 5310 Purchase of Service and Formula Funds on behalf of the Region 8 Coordinating Council for Community Transportation. The current sub-recipients of this funding are the Manchester Transit Authority, Easter Seals of New Hampshire, and The CareGivers, Inc. The SNHPC MPO will collect Title VI Assurances from sub-recipients prior to passing through federal funds.

The MPO does enter into contracts with municipalities and private consulting firms involving Federal funding. In all cases these contracts incorporate standard Certifications and Assurances related to Title VI Civil Rights responsibilities.

The MPO also provides assistance to the region’s public transportation agencies, MTA and CART, in developing demographic analyses in support of their Title VI and Disadvantaged Business Enterprise (DBE) program development.

3.11 Monitoring Sub-recipients

The MPO recognizes the obligation to ensure sub-recipients are in compliance with Title VI requirements, and would undertake the following activities to ensure that compliance:

- a) Document the process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
- b) Collect Title VI Programs from subrecipients and review programs for compliance.

- c) At the request of FTA, in response to a complaint of discrimination, request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.

3.12 Determination of Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

Per FTA Circular 4702.1B, “facilities” included in this provision are defined narrowly to exclude bus shelters, which are transit amenities; or larger projects such as bus stations or guideways subject to the NEPA process. Rather this section includes, but is not limited to, storage facilities, maintenance facilities, operations centers, etc. The MPO is not typically involved with site selection for projects of this sort.

Should the MPO at some point in the future be involved with this sort of support facility development, the MPO acknowledges its responsibility to complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. This process would include outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis would compare the equity impacts of various siting alternatives, and occur before the selection of the preferred site.

3.13 Requirement to Provide Additional Information Upon Request

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

3.14 Annual Reporting of Accomplishments

The MPO will prepare a document with Title VI accomplishments from the prior year, such as language requests, goals and achievements. The Title VI Accomplishments Report shall be submitted to the NHDOT by September 1st of each year.

4.0 REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS

In addition to the above requirements of all recipients of Federal funding, FTA Circular 4702.1B identifies the following requirements for Metropolitan Planning Organizations.

4.1 Requirement that Metropolitan Planning Activities Comply With Title VI

The SNHPC MPO recognizes that all metropolitan transportation planning activities must comply with 49 U.S.C. Section 5303, Metropolitan Transportation Planning, as well as subpart C of 23 CFR part 450, Metropolitan Transportation Planning and Programming. In its regional transportation planning capacity, the MPO will submit to the State as the primary recipient, FTA and FHWA:

- a) Documentation of compliance with the twelve general requirements for all recipients of Federal funding.

Discussion of the basic requirements of all recipients is included in Section 3.0 above. This plan serves as the referenced documentation.

- b) A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate;

Analysis of minority, low income and Limited English Proficiency (LEP) populations in the MPO region is addressed in Sections 3.7 and 3.8 above.

- c) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process;

A summary of MPO public participation procedures designed to gather information on the mobility needs of minority populations, individuals with disabilities, and low-income residents is described in Section 3.6 above.

- d) Where necessary, provide member agencies with regional data to assist them in identifying minority populations in their service area.

All MPO member communities and agencies are provided MPO demographic analyses of minority and other populations included here, and this information is also incorporated into the two Coordinated Public Transit/Human Services Transportation Plans covering the MPO region. As noted above, the MPO also provides technical assistance to the MTA and CART transit systems in developing their Title VI demographic analysis.

4.2 Requirements for Program Administration

The Executive Director of the Southern New Hampshire Planning Commission is responsible for ensuring the MPO fulfills its Title VI obligations through effective management and implementation of this program. The Title VI Coordinator is responsible for providing direct oversight in implementing the Title VI program and ensuring enforcement measures are carried out as appropriate in accordance with the Standard Assurances.

In order to comply with 49 CFR Section 21.5, the general nondiscrimination provision, the MPO recognizes its responsibility to document that, if Federal funds under any FTA or FHWA programs are passed through to sub-recipients, This is done without regard to race, color, or

national origin; and to assure that minority populations are not being denied the benefits of or excluded from participation in these programs.

As noted above, the MPO is itself a sub-recipient of Federal funding passed through the NH Department of Transportation, and has several sub-recipients of Section 5310 funding for elderly and disabled transportation services. While the MPO plays a role in prioritizing projects at the regional level for the TIP or specific funding programs such as Congestion Mitigation and Air Quality (CMAQ), in most cases actual programming authority is maintained by the NH Department of Transportation.

However, it is noted that the SNHPC will be a coordinating agency in the implementation of programming authority for Surface Transportation Block Grant funding for areas over 200,000 persons sub-allocated for use in the Nashua Urbanized Area. As part of this programming authority, the MPO will prepare and maintain the following information, and report it to NHDOT, FTA or FHWA if requested:

- a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.
- b. A description of how the MPO develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to sub-recipients serving predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.
- c. A description of the MPO's criteria for selecting entities to participate in federal grant programs.

APPENDIX A – TITLE VI NOTICE TO THE PUBLIC

Title VI Notice to Public

It is the policy of the Southern New Hampshire Planning Commission (SNHPC) Metropolitan Planning Organization (MPO) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all Federal programs and activities. Pursuant to this obligation, no person shall, on the grounds of race, color, national origin, sex, age, creed, disability, or income status be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity carried out by the MPO. The MPO will also monitor and enforce statutory requirements imposed on any sub-recipients and participants of Federally assisted programs and projects. The MPO further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

The SNHPC MPO operates without regard to race, color, national origin, sex, age, creed, disability or income status. MPO meetings are held in accessible locations, and reasonable accommodations are made for individuals with disabilities upon request within a reasonable advance notice period (usually two weeks or 10 business days). If you would like accessibility or language accommodation for any SNHPC MPO meeting, please contact:

Linda Moore-O'Brien
Southern New Hampshire Planning Commission
438 Dubuque Street
Manchester, NH 03102
PH: 603-669-4664, x301
Email: lmoore-o'brien@snhpc.org

If you feel you have been discriminated against based on your race, color, national origin, sex, age, creed, disability or income status, you may file a complaint using the SNHPC MPO Title VI Complaint Form. If you cannot download the document or need additional information, please feel free to contact the Southern New Hampshire Planning Commission at 603-669-4664.

Title VI Notice to the Public in Spanish Translation

Es la política de la Comisión de Planificación Southern New Hampshire (SNHPC) de la Organización de Planificación Metropolitana (MPO) para efectuar el Título VI del Acta de Derechos Civiles de 1964, según enmendada, la Ley de Restauración de Derechos Civiles de 1987, y los estatutos y reglamentos en todos los programas federales y actividades. En cumplimiento de esta obligación, ninguna persona, por motivos de raza, color, origen nacional, sexo, edad, credo, discapacidad o estado de ingresos será excluido de participar en, ser negado los beneficios de, ni será sujeta a discriminación en cualquier programa o actividad llevada a cabo por el MPO. La MPO también vigilar y hacer cumplir los requisitos obligatorios establecidos en las sub-beneficiarios y participantes de los programas de asistencia federal y proyectos. MPO asegura además que cada esfuerzo será hecho para asegurar la no discriminación en todos sus programas y operaciones, independientemente de la fuente de financiación.

La Comisión de Planificación Southern New Hampshire Organización de Planificación Metropolitana opera sin distinción de raza, color, origen nacional, sexo, edad, credo, discapacidad o estado de ingresos. MPO reuniones se llevan a cabo en lugares accesibles y razonables se hacen para las personas con discapacidad que lo soliciten dentro de un plazo de preaviso razonable (generalmente dos semanas o 10 días hábiles). Si desea alojamiento accesibilidad o el idioma para las reuniones MPO SNHPC, por favor póngase en contacto con el administrador de la oficina de SNHPC en 603-669-4664, extensión 301 o por correo electrónico: lmoore-o'brien@snhpc.org.

Si usted siente que ha sido discriminado por su raza, color, origen nacional, sexo, edad, credo, discapacidad o estado de ingresos, usted puede presentar una queja siguiendo la forma MPO SNHPC queja del Título VI. Si usted no puede descargar el documento o necesita información adicional, por favor no dude en ponerse en contacto con la Comisión de Planificación en Southern New Hampshire 603-669-4664.

APPENDIX B – TITLE VI CERTIFICATIONS AND ASSURANCES

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2017 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

(Required of all Applicants for federal assistance to be awarded by FTA and all FTA Grantees with an active Capital or Formula Award)

AFFIRMATION OF APPLICANT

Name of the Applicant: Southern New Hampshire Planning Commission

Name and Relationship of the Authorized Representative: David J. Preece, Executive Director

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2017, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2017.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature [Signature]

Date: 1/18/17

Name David J. Preece

Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): SOUTHERN NEW HAMPSHIRE PLANNING COMMISSION

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature [Signature]

Date: 1/19/2017

Name KRISTIN A. MENDOZA

Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA and each FTA Recipient with an active Capital or Formula Project or Award must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within FTA's electronic award and management system, provided the Applicant has on file and uploaded to FTA's electronic award and management system this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

APPENDIX C- TITLE VI COMPLAINT FORM 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 Southern New Hampshire Planning Commission.

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 RPC 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:

**Linda Moore-O'Brien
Title VI Coordinator
Southern New Hampshire Planning Commission
438 Dubuque Street
Manchester, NH 03102
Phone: (603) 669-4664
lmoore-o'brien@snhpc.org**

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

- 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 representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, creed, 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 SNHPC 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.) The SNHPC will notify the NHDOT Title VI Coordinator of any formal Title VI complaint within five business days of receiving the complaint.
- 4.) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.

- 5.) 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.
- 6.) Within 15 business days from receipt of a complete complaint, the SNHPC 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 SNHPC's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 7.) When SNHPC 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.
- 8.) 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.
- 9.) 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.
- 10.) If the Complainant is dissatisfied with SNHPC's resolution of the complaint, he/she has the right to file a complaint with the New Hampshire Department of Transportation at the following address:

Title VI Coordinator
New Hampshire Department of Transportation
P.O. Box 483, 7 Hazen Drive
Concord, NH 03302-0483
Phone: (603) 271-3767
TTY Access: (800) 735-2964

SNHPC MPO Title VI Complaint Form

The purpose of Title VI is to ensure no person in the United States shall, on the grounds of race, color, creed 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 from the U.S. Department of Transportation. Later statutes extended the scope of Title VI to include prohibitions against discrimination on the basis of age, sex, and disability.

The program enables the Southern New Hampshire Planning Commission (SNHPC) and sub-recipients to comply with requirements contained in the Title VI regulations issued by the U.S. Department of Justice (DOJ) (28 CFR Part 42, Subpart F) and the U.S. Department of Transportation (DOT) (49 CFR Part 21), and to administer programs, policies, and activities in a manner that is consistent with the DOT Order on Environmental Justice (Order 5610.2) and the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

If you wish to file a complaint, please complete the form and explain as clearly as possible what happened and why you believe you were discriminated against.

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
E-Mail Address:		
Section II:		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to this question, 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.	Yes	No
Section III:		
<i>I believe the discrimination I experienced was based on (check all that apply):</i> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Sex <input type="checkbox"/> Disability <i>Date of Alleged Discrimination (Month, Day, Year):</i> _____ <i>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.</i> 		

Section IV:		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> 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 to:

Linda Moore-O'Brien, Title VI Coordinator
 Southern New Hampshire Planning Commission
 438 Dubuque Street
 Manchester, NH 03102

APPENDIX D - SNHPC MPO & TAC MEMBERSHIP

Member	Representation	Affiliation
Dean Williams	Central NH Regional Planning Commission	SNHPC MPO and TAC
Bill Klubben	City of Manchester	SNHPC TAC
Dan O'Neil	City of Manchester	SNHPC MPO
Elias "Skip" Ashooh	City of Manchester	SNHPC MPO
Kevin McCue	City of Manchester	SNHPC MPO
Peter Capano	City of Manchester	SNHPC MPO
Ray Clement	City of Manchester	SNHPC MPO
Todd Connors	City of Manchester	SNHPC TAC
Melanie Sanuth	City of Manchester	SNHPC TAC
Scott Bogle	Cooperative Alliance for Regional Transportation	SNHPC MPO and TAC
Fred Roberge	Easter Seals of NH	SNHPC TAC
Leigh Levine	FHWA NH Division	SNHPC MPO and TAC
Leah Sirmin	Federal Transit Administration	SNHPC MPO and TAC
Nancy Michels	Greater Manchester Chamber of Commerce	SNHPC TAC
Michael Whitten	Manchester Transit Authority	SNHPC MPO and TAC
Jay Minkarah	Nashua Regional Planning Commission	SNHPC MPO and TAC
Elizabeth Strachan	NHDES	SNHPC MPO and TAC
Timothy White	NHDES	SNHPC MPO and TAC
Bill Watson	NHDOT	SNHPC MPO and TAC
William Rose	NHDOT	SNHPC MPO and TAC
Tim Roache	Rockingham Planning Commission	SNHPC MPO and TAC
Sylvia von Aulock	Southern NH Planning Commission	SNHPC TAC
Tim Murphy	Southwest Region Planning Commission	SNHPC MPO and TAC
Cynthia Copeland	Strafford Regional Planning Commission	SNHPC MPO and TAC
Charles "Stoney" Worster	Town of Auburn	SNHPC MPO
Ron Poltak	Town of Auburn	SNHPC MPO
William Herman	Town of Auburn	SNHPC MPO
Barbara Salvatore	Town of Bedford	SNHPC MPO
Bill Jean	Town of Bedford	SNHPC MPO
David Danielson	Town of Bedford	SNHPC MPO
Karen McGinley	Town of Bedford	SNHPC MPO
Rene Pincince	Town of Bedford	SNHPC MPO
William Duschatko	Town of Bedford	SNHPC MPO
Rebecca Hebert	Town of Bedford	SNHPC TAC
Mark Connors	Town of Bedford	SNHPC TAC
Albert Hall	Town of Candia	SNHPC MPO
Dick Snow	Town of Candia	SNHPC MPO and TAC
Andrew Hadik	Town of Chester	SNHPC MPO and TAC
Deb Munson	Town of Chester	SNHPC MPO

Member	Representation	Affiliation
Fran Menard	Town of Deerfield	SNHPC MPO
Fred McGarry	Town of Deerfield	SNHPC MPO
Adam Burch	Town of Derry	SNHPC MPO
Jeff Moulton	Town of Derry	SNHPC MPO
John O'Connor	Town of Derry	SNHPC MPO
Frank Bartkiewicz	Town of Derry	SNHPC MPO
George Sioras	Town of Derry	SNHPC TAC
Guy Tolman	Town of Francestown	SNHPC MPO
Jennifer Vadney	Town of Francestown	SNHPC MPO
Rebecca Harris	Town of Francestown	SNHPC MPO and TAC
Scot Heath	Town of Francestown	SNHPC MPO
Barbara Griffin	Town of Goffstown	SNHPC MPO
David Pierce	Town of Goffstown	SNHPC MPO
Jo Ann Duffy	Town of Goffstown	SNHPC MPO and TAC
Hank Boyle	Town of Goffstown	SNHPC MPO
Cutler Brown	Town of Hooksett	SNHPC MPO and TAC
Dick Marshall	Town of Hooksett	SNHPC MPO
Leslie Boswak	Town of Hooksett	SNHPC MPO
Deborah Lievens	Town of Londonderry	SNHPC MPO
Leitha Reilly	Town of Londonderry	SNHPC MPO
Martin Srugis	Town of Londonderry	SNHPC MPO
Sharon Carson	Town of Londonderry	SNHPC MPO
Colleen Mailloux	Town of Londonderry	SNHPC TAC
Art Rugg	Town of Londonderry	SNHPC MPO
Joe Constance	Town of New Boston	SNHPC MPO
Mark Suennen	Town of New Boston	SNHPC MPO and TAC
Angela Drake	Town of Weare	SNHPC MPO
Wendy Stevens	Town of Weare	SNHPC MPO
Thomas Clow	Town of Weare	SNHPC TAC
Carl Griffin	Town of Windham	SNHPC MPO
Eileen Mashimo	Town of Windham	SNHPC MPO
Mark Samsel	Town of Windham	SNHPC MPO
Peter Griffin	Town of Windham	SNHPC MPO