

Federal Transit Administration

Title VI Program

Grafton County Senior Citizens Council, Inc

August 2026



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The Grafton County Senior Citizens Council Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan adopted on: 8-4-26

Adopted by: GCSCC Board of Directors

Signature(s): William Geraghty

William Geraghty

President, GCSCC Board of Directors

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.

Grafton County Senior Citizens Council 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) was April 27, 2026

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
05/26	Revision Log, Notice, Public Outreach Activities, LAP	Updated LEP data, updated Complaint Form, list of offices, LAP expounded, other
2023	New template	Plan revision log updated.
7/7/2020	Service Evaluation	GCSCC uses daily data collection aggregated at months' end, annual client satisfaction surveys, and annual reports for monitoring and measurement of service standards and policies for annual reviews. No annual review has led to service changes.

6/22/2018	Service Evaluation	On July 1, 2012, GCSCC eliminated the adult in-home care and homemaker program. That is the only substantive service change that has occurred in the past five years, and the service was eliminated in consultation with the New Hampshire Department of Health and Human Services, in alignment with all state rules and policies, and only after GCSCC identified successor agencies to assume responsibility for the program. Information about this change is available by contacting GCSCC.
10/16/16		A desk review dated 11/17/2016 led to multiple revisions. Sections affected included: Introduction and Notice to Public; Complaint Procedures; Record of Title VI Investigations, Complaints, and
		Lawsuits; Language Assistance Plan; Table Depicting Racial Breakdown of the Transit- Related, Non-Elected Planning Boards, Advisory Councils or Committees, or Similar Bodies; public Notice Elements

Section 2: Title VI Policy Statement

Policy Statement

The Grafton County Senior Citizens Council, 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 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. The Grafton County Senior Citizens Council operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The Grafton County Senior Citizens Council's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Grafton County Senior Citizens Council

The Grafton County Senior Citizens Council 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 the Grafton County Senior Citizens Council.

For more information on the Grafton County Senior Citizens Council's civil rights program, the procedures to file a complaint, or to file a complaint, please contact Kathleen Vasconcelos, Executive Director at 603-448-4897, (TTY Relay 7-1-1 603-448-4897); email kvasconcelos@gcsc.org; or visit our administrative office at 10 Campbell St., Lebanon, NH. For more information, visit www.gcsc.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 603-448-4897

The Grafton County Senior Citizens Council's Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Upper Valley Senior Center, 10 Campbell Street, Lebanon, NH 03766
2. Plymouth Regional Senior Center, 8 Depot Street, Plymouth, NH 03264
3. Newfound Area Senior Services, 15 Church Street, Bristol, NH 03222
4. Lin-Wood Area Senior Services, 194 Pollard Road, Lincoln, NH 03251
5. Littleton Area Senior Center, 77 Riverglen Lane, Littleton, NH 03561
6. Mascoma Area Senior Center, 1166 US Route 4, Canaan, NH 03741
7. Horse Meadow Senior Center, 91 Horse Meadow Road, North Haverhill, NH 03774
8. Administration Office, 10 Campbell Street, Lebanon, NH 03766

Section 4: Title VI Complaint Procedure

The Grafton County Senior Citizens Council's Title VI Complaint Procedure is made available in the following locations:

- ☒ Agency website: GCSCC.org
- ☒ Hard copy in the central office
- ☒ Agency Title VI Plan

Any individual, group of individuals, or entity that believes they have been discriminated against on the basis of race, color, or national origin by the Grafton County Senior Citizens Council may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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 the Grafton County Senior Citizens Council 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, the Grafton County Senior Citizens Council 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.

The Grafton County Senior Citizens Council has 45 days to investigate the complaint. If more information is needed to resolve the case, the Grafton County Senior Citizens Council may contact the complainant, requesting further information. The complainant has 30 business days from the date of the letter to send the 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, the Grafton County Senior Citizens Council 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 closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A letter of finding (LOF) 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, the complainant must direct the appeal to the agency initially. The complainant has 30 days after the date of the closure letter or the letter of finding to do so. If there is an 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 603-448-4897.

Section 5: Title VI Complaint Form

The Grafton County Senior Citizens Title VI Complaint Form is made available in the following locations:

- ☒ Agency website, www.GCSCC.org
- ☒ Hard copy in the central office
- ☒ Agency Title VI Plan

GCSCC TITLE VI COMPLAINT FORM

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

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

**Kathleen Vasconcelos, Executive Director
Grafton County Senior Citizens Council, Inc.
PO Box 433
10 Campbell St.
Lebanon, NH 03766-0433**

PLEASE PRINT

1. Complainant's Name:

- a. Address:
- b. City: State: Zip Code:
- c. Telephone – Please include area code:
- d. E-Mail Address:

Do you prefer to be contacted via this e-mail address? ☐Yes ☐No

2. Accessible Format of Form Needed?

☐ Large Print ☐ Audio Tape ☐ TDD

☐ Other (please specify):

3. Are you filing this complaint on your own behalf?

☐ Yes If YES, please go to Question 7

☐ No If no, please go to question 4

4. If you answered NO to question 3 above, please provide your name and address.

a. Name of Person Filing Complaint:

b. Address:

c. City: State: Zip Code:

d. Telephone -Please include area code:

e. E-Mail Address:

Do you prefer to be contacted via this e-mail address? ☐ Yes ☐ No

5. What is your relationship to the person for whom you are filing the complaint?

6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

☐ Yes, I have permission.

☐ No, I do not have permission.

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

☐ Race ☐ Color ☐ National Origin (Classes protected by Title VI)

☐ Other (please specify)

8. Date of Alleged Discrimination (Month, Day, Year):

9. Where did the Alleged Discrimination take place?

10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). Use the back of this form or separate pages if additional space is required.

11. Please list any and all witnesses' names and phone numbers/contact information.
Use the back of this form or separate pages if additional space is required.

12. What type of corrective action would you like to see taken?

13. Have you filed a complaint with any other Federal, State or Local Agency or with any Federal or State Court?

☐ Yes If yes, check all that apply

a. ☐ Federal Agency (List agency's name)

b. ☐ Federal Court (Please provide location)

c. ☐ State Court

d. ☐ State Agency (Specify Agency)

e. ☐ County Court (Specify Court and County)

f. ☐ Local Agency (Specify Agency)

☐ No

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

Name: / Title:

Agency: /Telephone:

Address:

City: State: Zip Code:

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

Signature and date is required:

Signature Date

If you completed Questions 4, 5 and 6, your signature and date is required

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

The Grafton County Senior Citizens Council maintains a list or log of all Title VI investigations, complaints, and lawsuits pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaints, 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

To promote inclusive public participation, the Grafton County Senior Citizens Council will employ the following strategies, as appropriate.

- 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.
- 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 the Grafton County Senior Citizens Council since the last Title VI Program submission are summarized in the table below.

Event Date/Frequency	GCSCC Staff/Dept.	Activity	Communication (Public notice, posters, social media)	Notes
Yearly	Marketing & Development	Service Brochures	Direct Mailing	To raise awareness
Annually	Marketing & Development	Promotional Event	Public Event	To raise awareness
Ongoing	Marketing & Development	Service Announcements	Social media	To raise awareness
Yearly	Marketing & Development	Annual Report	Mailed and on Website	To raise awareness
Monthly	Senior Centers	Newsletters	Hard copy and online versions — direct mail, emailed, and on website & media	Circulated among community partners: food pantries, hospitals,

				United Way, etc.
Annually	Data Specialist	Surveys	Direct to client	Specific transportation survey
Ongoing	Senior Center Staff	Outreach	Direct to Community	Presentations
Ongoing	Marketing & Development	Public Announcements	Newspapers, Radio, social media	To raise awareness

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the Grafton County Senior Citizens Council is required to take reasonable steps to ensure meaningful access to our programs and activities by limited English proficient (LEP) persons.

Grafton County Senior Citizen Council has developed the following Language Assistance Plan to ensure meaningful access to program services for limited English proficient (LEP) individuals.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for plan updates.

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 Grafton County Senior Citizens Council's 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 services.
- 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, the Grafton County Senior Citizens Council has conducted a Four Factor Analysis of the following areas:

- 1) Limited English Proficient (LEP) Speaker Demography
- 2) Contact Frequency
- 3) Importance of Service
- 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, the Grafton County Senior Citizens Council 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, 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 with which the Grafton County Senior Citizens Council staff comes into contact with LEP persons.

Examples of contact could include:

- (a) Use of bus and rail service
- (b) Participation in public meetings
- (c) Customer service interactions

- (d) Ridership surveys
- (e) Operator surveys.

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

Item #1 —Results of the Four Factor Analysis (including a description of the LEP population(s) served)

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

Of the 88,692 residents in the Grafton County Senior Citizens Council's service area, 1,111 residents describe themselves as speaking English less than "very well". For the Grafton County Senior Citizens Council's service area, the latest U.S. Census Bureau data shows that among the area's population, 1.25 % speak English "less than very well."

	Grafton County, New Hampshire	
Label	Estimate	Percentage
Total:	88,692	
Speak only English	83,154	
Spanish:	882	
Speak English less than "very well"	120	0.14%
French, Haitian, or Cajun:	787	
Speak English less than "very well"	66	0.07%
German or other West Germanic languages:	328	
Speak English less than "very well"	38	0.04%
Russian, Polish, or other Slavic languages:	422	
Speak English less than "very well"	47	0.05%
Other Indo-European languages:	822	
Speak English less than "very well"	113	0.13%
Korean:	92	
Speak English less than "very well"	18	0.02%
Chinese (incl. Mandarin, Cantonese):	880	
Speak English less than "very well"	369	0.42%
Vietnamese:	116	
Speak English less than "very well"	78	0.09%
Tagalog (incl. Filipino):	86	
Speak English less than "very well"	31	0.03%
Other Asian and Pacific Island languages:	733	
Speak English less than "very well"	181	0.20%
Arabic:	208	
Speak English less than "very well"	28	0.03%
Other and unspecified languages:	182	
Speak English less than "very well"	22	0.02%

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

As part of its assessment of limited English proficiency (LEP) needs within the service area, Grafton County Senior Citizens Council periodically surveys drivers, dispatchers, and other public-facing employees regarding the frequency with which they encounter individuals who have difficulty communicating in English. Staff may be asked to estimate the approximate number of monthly interactions with LEP individuals over the previous year in order to help evaluate the need for language assistance services.

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.

Grafton County Senior Citizens Council will work with community partners to assess the extent to which they encounter LEP populations and then to make any necessary adjustments to accommodate newly identified LEP opportunities for improvement.

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

Access to transportation provided by Grafton County Senior Citizens Council can be critical for many residents who depend on services for access to employment as well as to essential community services such as shopping, medical appointments, nutrition, socialization opportunities, and other daily needs. Reliable transportation helps individuals maintain independence, remain connected to their communities, and access programs and services that support their overall health, safety, and quality of life.

Grafton County Senior Citizens Council recognizes that transportation barriers can disproportionately impact older adults, individuals with disabilities, low-income populations, and individuals with limited English proficiency (LEP). As part of its commitment to Title VI compliance, Grafton County Senior Citizens Council strives to ensure that transportation services are provided in a fair, equitable, and nondiscriminatory manner.

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

The Grafton County Senior Citizens Council makes every effort to make its programs, services, and activities accessible to LEP individuals. The Grafton County Senior Citizens

Council will use available resources, both internal and external, to accommodate reasonable requests for translations.

Item # 2 — Description of how Language Assistance Services are Provided, by Language
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Grafton County Senior Citizens Council recognizes that meaningful access under Title VI extends beyond simply identifying a communication barrier and includes ensuring that staff have practical tools and resources available to respond appropriately when assistance is needed. To support this effort, Grafton County Senior Citizens Council maintains a centralized collection of accessibility and communication resources on the agency's shared drive, which is accessible to staff across all locations. These resources are intended to provide employees with immediate guidance and referral options when interacting with individuals who are limited English proficient (LEP) or who may have hearing, speech, or visual impairments.

If an individual presents with limited English proficiency, staff may utilize tools such as "I Speak" language identification cards to help determine the individual's preferred language. Employees can then reference the shared resource materials for guidance on obtaining assistance, locating interpretation resources, or identifying appropriate referral agencies and communication supports.

The shared resource materials also include information regarding services available to individuals with hearing or visual impairments, including but not limited to:

- Relay New Hampshire
- Northeast Deaf and Hard of Hearing Services
- Greater Nashua Mental Health Deaf Services
- New Hampshire Department of Education

Additionally, Grafton County Senior Citizens Council uses the following:

- (a) The Grafton County Senior Citizens Council has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts, and social service agencies that are available to assist with its LEP responsibilities.
- (b) A list of web-based translation services can be provided by contacting the Human Resources Department.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

To ensure that LEP individuals are aware of Grafton County Senior Citizens Council language assistance measures, Grafton County Senior Citizens Council provides the following:

- Title VI Program, including the Language Assistance Plan, is made available on the website and in hard copy at the administration office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.

Item # 4 — Description of how the Language Assistance Plan is Monitored and Updated

Grafton County Senior Citizens Council will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Grafton County Senior Citizens Council service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Grafton County Senior Citizens Council's financial resources are sufficient to fund the language assistance resources needed.
- Determine whether Grafton County Senior Citizens Council has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the Grafton County Senior Citizens Council's failure to meet the needs of LEP individuals

Item # 5- Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Grafton County Senior Citizens Council staff:

Information on the Grafton County Senior Citizens Council Title VI Procedures and LEP responsibilities will be reviewed annually with all staff during Grafton County Senior Citizen Council's annual Safety Meeting Day. In addition, the Title VI Plan will be given to each new employee and will be reviewed as part of the onboarding process.

- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- How to handle a potential Title VI / LEP complaint.
- Limited English Proficient (LEP) Resource Materials:

LEP Policy

Grafton County Senior Citizens Council shall provide communication for limited English proficient riders to ensure them an 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.

If you need help with English, please call 603-448-4897

"I Speak" Language Identification Card

Note: For additional languages, visit the US Census Bureau website
<http://www.lep.gov/ISpeakCards2004.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 fiaüh daäu vaø oå naøy neäu quyü vö bieät hoic vaø nobi fiööic Vieät Ngöö.	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
	OTMeTMTb 3TOT \$na>KOK, ecnv•l Bbl roBopv1Te no-pyccKb,1	Russian
	03Haqv1Te OBY KYhv114Y aK0 roBopL,1Te cpncKh	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

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
10/01/2020		Spanish	Irma Quiroz	General Information	None	Robin Kristoff	Staff spoke Spanish
2022-2026	Ongoing	German	Zophia Waloch	Nutrition and Transportation	None	Lisa Adams	Spoke enough English
2026	Ongoing	Spanish	Sylvester Labrone	General Information	None	Lisa Adams	Spoke enough English

Section 9: Minority Representation Information

Recipients that have **transit-related** non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

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
N/A						

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

B. Efforts to Encourage Minority Participation

There are no non-elected transit-related boards, committees, or councils.

While Grafton County Senior Citizens Council's Board of Directors and Advisory Council members are comprised of elected members, participation from minorities and individuals representing the LEP are pursued and valued. Grafton County Senior Citizens Council's Board of Directors meetings and other meetings are open to the public.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does the agency provide funding to subrecipients?
☒ No, the agency does not have subrecipients.

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.

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.

Grafton County Senior Citizens Council

- ☐ is a fixed route transit provider
- ☒ is not a fixed route transit provider