

***Federal Transit Administration  
Title VI Program***

**The Lakes Region Mental Health Center, Inc.**

**September 26 , 2023**

# **Title VI Plan Table of Contents**


**The Lakes Region Mental Health Center, Inc.** Title VI plan includes the following elements:

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

**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: September 26, 2023

Adopted by: The Lakes Region Mental Health Center,  
Inc. Board of Director

Signature(s):   
Laura LeMier, Board President  
The Lakes Region Mental Health Center, Inc.

MOTION MADE, SECONDED AND PASSED: To approve the Federal Transit Administration Title VI plan and authorize the board president to execute any and all necessary documentation.

## 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.

The Lakes Region Mental Health Center, Inc. will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: February 7, 2023

## Title VI Plan Revision Log

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
03/15/2019	Plan	Full revision of policy
08/01/2022	Overall plan language.	Removal of some earlier survey documentation.

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

The Lakes Region Mental Health Center, Inc., operating as a demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New Hampshire Department of Transportation (NHDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and NHDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc.'s Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **The Lakes Region Mental Health Center, Inc.**

- The Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc.

For more information on The Lakes Region Mental Health Center, Inc.'s civil rights program, the procedures to file a complaint, or to file a complaint, please contact Sue Drolet, Chief Human Resources Officer, at 603 524-1100, ext.156, email [sdrolet@lrmhc.org](mailto:sdrolet@lrmhc.org) or visit our administrative office at 40 Beacon St. East, Laconia, NH 03246. For more information, visit [www.lrmhc.org](http://www.lrmhc.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](mailto:titlevi@dot.nh.gov)

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

- If information is needed in another language, contact (603) 524-1100 and ask the Support Staff for assistance in accessing CLI services.

**The Lakes Region Mental Health Center, Inc.** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 40 Beacon St. East, Laconia, NH
2. 67 Spring St., Laconia, NH
3. 81 Highland St., Plymouth, NH
4. Plymouth Van based at 81 Highland St.
5. Laconia Bus based at 40 Beacon St. East.

#### **Section 4: Title VI Complaint Procedure**

The Lakes Region Mental Health Center, Inc's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.lrmhc.org](http://www.lrmhc.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 Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc.** has 45 days to investigate the complaint. If more information is needed to resolve the case, **The Lakes Region Mental Health Center, Inc.** may contact the complainant requesting further information. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, **The Lakes Region Mental Health Center, Inc.** 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 it must direct the appeal to the agency initially. The complainant has 21 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

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

Or

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

If information is needed in another language, then contact (603) 524-1100

**Section 5: Title VI Complaint Form**

The Lakes Region Mental Health Center, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website: [www.lrmhc.org](http://www.lrmhc.org)
- Hard copy in the central office
- Agency Title VI Plan

**The Lakes Region Mental Health Center, Inc.  
Title VI Complaint Form**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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 believe the discrimination I experienced was based on (check all that apply):**

Title VI:  Race       Color       National Origin

Other (specify): \_\_\_\_\_

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section IV**

Have you previously filed a Civil Rights related 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?

Yes                       No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_                       State Agency \_\_\_\_\_

State Court \_\_\_\_\_                       Local Agency \_\_\_\_\_

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency:
Address:
Telephone:
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

**Signature and date required below**

---

**Signature**

**Date**

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

Sue Drolet, SPHR, SHRM-SCP  
 Chief Human Resources Officer  
 Lakes Region Mental Health Center  
 40 Beacon Street East, Laconia, NH 03246  
 p – 603-524-1100 x156  
 e – [sdrolet@lrmhc.org](mailto:sdrolet@lrmhc.org)  
[www.lrmhc.org](http://www.lrmhc.org)

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

The Lakes Region Mental Health Center, Inc. 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, complaint and/or lawsuits filed against us since the last plan submission.

       There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

## **Section 7: Public Participation Plan**

### **Strategies and Desired Outcomes**

To promote inclusive public participation, The Lakes Region Mental Health Center, Inc. will employ the following strategies, as appropriate:

### **Key Principles**

The Lakes Region Mental Health Center, Inc., Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in agency’s service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public’s contribution can and will influence The Lakes Region Mental Health Center, Inc.’s

decision making;

- The concerns of all participants involved will be considered in the decision-making process; and,
- The Lakes Region Mental Health Center, Inc. will seek out and facilitate the involvement of those potentially affected.

Through an open public process, The Lakes Region Mental Health Center, Inc. has developed a public participation plan to encourage and guide public involvement efforts and enhance access to agency transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that The Lakes Region Mental Health Center, Inc. uses to reach its riders.

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

### **Limited English Proficient (LEP) Goals of the Public Participation Plan**

The overarching goals of The Lakes Region Mental Health Center, Inc.'s PPP include:

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

### **Objectives of the Public Participation Plan**

LRMHC' Public Participation Plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness – The Lakes Region Mental Health Center, Inc. will proactively reach out to and engage low income, minority and LEP populations from the service area.
- Respect - All feedback will be given careful and respectful consideration.
- Proactive and Timeliness - Participation methods will allow for early involvement and

be ongoing.

- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy and complete.
- Responsiveness – The Lakes Region Mental Health Center, Inc. will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

## **Regional Partnership**

An oversight of LRMHC service and activities is conducted internally, as well as externally through both Mid-State and Grafton County RCCs.

## **1.The Lakes Region Mental Health Center, Inc.’s Public Participation Process**

### **Outreach Efforts**

The Lakes Region Mental Health Center, Inc.’s seeks and receives feedback on its services from riders, drivers, staff members and other members of the community, as well as the members of the Mid-State and Grafton County Regional Coordinating Councils (RCCs) for Community Transportation which assists The Lakes Region Mental Health Center, Inc. in its advisory capacity.

### **LRMHC Mediums**

- Website at [www.lrmhc.org](http://www.lrmhc.org)
- Social Media – Facebook, Twitter and LinkedIn and has over 2,000 followers
- Print – newspapers and other periodicals
- Electronic Donor Newsletters – Are issued quarterly to over 700 recipients
- Radio – We contract with two radio stations to air periodic PSAs throughout each month
- Outdoor – Agency logo on both transportation buses
- Community Awareness Events – including schools, municipalities, partner organizations and other community-related events
- Quality Improvement Committee of the Board: a standing committee that includes in its membership Board members, staff, community members, clients and family members. It is chaired by a Board member. The goal of the committee is to ensure that our clients receive care of the highest quality, in accordance with applicable laws, rules and regulations.
- Finance and Investment Committee of the Board: is a standing committee consisting of Board and community members. It is chaired by the Board Treasurer. The committee monitors all financial aspects of the organization except that of fundraising, recommends policies to the Board, reviews and oversees the creation of financial statements to be presented to the Board, reviews the annual budget and recommends its approval to the Board, monitors financial statements and financial investments, monitors compliance with

federal, state and other reporting requirements, oversees and implements an investment policy for the assets of the organization, oversees preparation and filing of the annual CPA audit and IRS Form 990, and reviews and makes recommendations on other financial matters as they arise or as needed.

- **Development Committee of the Board:** is a standing committee of the Board, chaired by a Board member. The committee works with development staff to create and implement a development plan, incorporating activities to yield additional revenue, work with staff to identify, cultivate, and solicit funds from various sources of support, and develops guidelines to ensure stakeholders are acknowledged appropriately, fundraising efforts are cost-effective, and ethical practices are followed. Community members, staff, patients and patient families are invited to participate in local community awareness events. Ad hoc committees are formed as needed to facilitate special events and other fundraising activities (such as the Auction Committee that meets from May to November).
- **Governance Committee of the board:** is a standing committee typically chaired by the Board Secretary. The committee identifies and nominates new and returning individuals from the community for election to the Board and Board officers, regularly reviews the bylaws and makes recommendations to the Board for change/modification, periodically reviews Board and advisory council formation, roles, responsibilities and policy, periodically facilitates Board evaluation, and ensures all Board members execute Conflict of Interest statements annually.
- **The Lakes Region Mental Health Center, Inc. Board of Directors:** Our board consists of individuals from diverse professional and personal backgrounds who reside within the towns that make up our catchment area. Members felt that it was critical to have strong representative from these towns given the large rural geographical nature of our service area. It's also important to have access to different perspectives as it relates to patient care. For this reason, we have a patient and several persons who have a family member with a mental illness diagnosis serve as members of the board. Our meetings are open to the public and transportation can be arranged if needed. Board members and community members are represented on all standing committees of the board. Our board is predominately white.
- **The Lakes Region Mental Health Center, Inc. does attend town budget, Selectboard and town meetings of the towns we serve.** Given that the majority of municipalities provide funding to The Lakes Region Mental Health Center, Inc. to help offset the cost of providing Emergency Services to residents, these relationships are important to The Lakes Region Mental Health Center, Inc.. Development staff attends all hearings and makes presentation to town officials about the services that were provided to The Lakes Region Mental Health Center, Inc. to residents in each town. It is also an opportunity to raise awareness and address questions about the important work that we do. When necessary, our CEO and CFO work with local officials regarding topics that pertain to the provision of services and our recognition as a public health organization.

## **Addressing Comments**

### ***The Incorporation of Public Comments into Decisions***

Any comments The Lakes Region Mental Health Center, Inc. receives are given careful, thoughtful consideration. These come from the public often in the form of direct feedback. In addition, patient surveys, social media or through staff, board and committee members feedback is obtained. Oral comments are transcribed and distributed accordingly so that these too are given appropriate attention. All comments are addressed. Any unresolved issues may

be presented to The Lakes Region Mental Health Center, Inc.'s Board of Directors for consideration.

## **Identification of Stakeholders**

### ***Our Community Partners***

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of the plan. Those who may be adversely affected, or who may be denied benefits of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses.

### ***Stakeholder List***

Any community organization or person can be added to the LRMHC stakeholder list and receive regular communications regarding service changes by contacting the LRMHC administrative office at 603-524-1100. Local organizations and businesses can also request that a speaker from LRMHC attend their regular meeting at the same number provided above.

## **I. DECISION MAKING BODIES**

### ***Board of Director and Executive Management***

At Lakes Region Mental Health Center, Inc, the board creates the overarching strategic plan (3 years) that encompasses the following four broad goals: Organizational Stability, Technology Investment, Enhanced Clinical Services and Enhanced Collaborations. The plan also identifies the specific action steps that will be undertaken to meet these four goals and outlines timelines and metrics. Based on this guidance, decisions regarding policy, procedures, processes, service delivery changes, and service programming are made by the Executive Management Team. The Lakes Region Mental Center, Inc.'s Board of Directors is composed of 16 Board members and two committee members representing many of the towns and cities within our catchment area. The Lakes Region Mental Health Center, Inc. also has a number of standing committees made up of board and community members and their responsibilities are outlined above. Our QI and Clinical team who holds ongoing meetings help guide decisions regarding routes, schedules, and other topics important to the community and our patients. Patients are encouraged to notify The Lakes Region Mental Health Center, Inc. anytime they need transportation so we are able to provide on-call service wherever possible. All Board and Executive/Internal meetings are held in our conference center at our 40 Beacon Street East location in Laconia or on zoom. Meeting notices are always posted in advance and sent electronically.

### **Public Outreach Activities**

The public outreach and involvement activities conducted by The Lakes Region Mental Health Center, Inc. since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>The Lakes Region Mental Health Center, Inc. Staffer(s) or Department</b>	<b>Activity</b>	<b>Communication Method (Public notice, posters, social media)</b>	<b>Notes</b>
On-Going	Development	Public Education	Summary of Services Brochure	Includes information on transportation services, Title VI protections and language assistance services. All Office locations
On-going	Transportation	Public Education	Title VI Posting	Plymouth Van
On-going	Transportation	Public Education	Title VI Posting	Laconia Bus.
Bi-Monthly	Facilities/Transportation	Outreach	Attends Grafton-Coos RCC Meeting	
Bi-Monthly	Facilities/Transportation	Outreach/Coordination	Attends Mid-State RCC Meeting	

## Section 8: Language Assistance Plan

### *Plan Components*

As a recipient of federal US DOT funding, **The Lakes Region Mental Health Center, Inc.** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

The Lakes Region Mental Health Center, Inc.'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 service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons



### **Four Factor Analysis Methodology**

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

**Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, The Lakes Region Mental Health Center, Inc.'s will identify:

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

**Factor 2: The frequency with which LEP persons come into contact with the program:** Identifies and assesses the frequency The Lakes Region Mental Health Center, Inc.'s staff comes into contact with LEP persons. Examples of contact could include:

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

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

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

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 86,774 residents in The Lakes Region Mental Health Center, Inc. service area, the latest U.S. Census Bureau data shows that among the area's population 558 individual (.006%) speak English "less than very well." **For these groups** who speak English "less than very well," the percentages are highlighted below:

	Combined Service Area	Combined Service Area
Label	Estimate	Percent of Population
Total:	86,774	
Speak only English	83,614	
Spanish:	730	0.84%
Speak English "very well"	604	0.70%
Speak English less than "very well"	126	0.15%
French, Haitian, or Cajun:	780	0.90%
Speak English "very well"	697	0.80%
Speak English less than "very well"	83	0.10%
German or other West Germanic languages:	264	0.30%
Speak English "very well"	240	0.28%
Speak English less than "very well"	24	0.03%
Russian, Polish, or other Slavic languages:	128	0.15%
Speak English "very well"	82	0.09%
Speak English less than "very well"	46	0.05%
Other Indo-European languages:	538	0.62%
Speak English "very well"	475	0.55%
Speak English less than "very well"	63	0.07%
Korean:	49	0.06%
Speak English "very well"	26	0.03%
Speak English less than "very well"	23	0.03%
Chinese (incl. Mandarin, Cantonese):	109	0.13%
Speak English "very well"	84	0.10%
Speak English less than "very well"	25	0.03%
Vietnamese:	39	0.04%
Speak English "very well"	37	0.04%

Speak English less than "very well"	2	0.00%
Tagalog (incl. Filipino):	204	0.24%
Speak English "very well"	138	0.16%
Speak English less than "very well"	66	0.08%
Other Asian and Pacific Island languages:	194	0.22%
Speak English "very well"	95	0.11%
Speak English less than "very well"	99	0.11%
Arabic:	8	0.01%
Speak English "very well"	8	0.01%
Speak English less than "very well"	0	0.00%
Other and unspecified languages:	117	0.13%
Speak English "very well"	116	0.13%
Speak English less than "very well"	1	0.00%

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

The Lakes Region Mental Health Center, Inc. assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Due to the limited presence of individuals within our service area who speak English less than "very well," such encounters are rare. The Lakes Region Mental Health Center, Inc. provides approximately 3400 passenger trips per year. If an individual has speech limitations, the dispatcher or driver can contact The Lakes Region Mental Health Services, Inc. clinical and/or to access translation services, if needed, to ensure the individual receives language assistance attain access to the transit services.

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

All of The Lakes Region Mental Health Center, Inc.'s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Lakes Region Mental Health Center, Inc. is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, The Lakes Region Mental Health Center, Inc. will strive to provide alternative but meaningfully accessibility. To accomplish this, The Lakes Region Mental Health Center, Inc., maintains and has maintained a contractual arrangement with a phone-based translation service. Moreover, The Lakes Region Mental Health Center, Inc. continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

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

The Lakes Region Mental Health Center, Inc. makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Lakes Region Mental Health Center, Inc. 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**

The Lakes Region Mental Health Center, Inc. has identified, developed, and uses the following:

- a) Individuals who have contact with the public will be provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The Lakes Region Mental Health Center, Inc. has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A phone-based translation service is available via requests from clinical staff or through direct requests to the agency’s administrative services.

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

In order to ensure that LEP individuals are aware of The Lakes Region Mental Health Center, Inc.’s language assistance measures, The Lakes Region Mental Health Center, Inc. provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central 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**

The Lakes Region Mental Health Center, Inc. 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 Lakes Region Mental Health Center, Inc. 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 The Lakes Region Mental Health Center, Inc.’s financial resources are sufficient to fund language assistance resources needed.

- Determine whether The Lakes Region Mental Health Center, Inc. has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning The Lakes Region Mental Health Center, Inc.’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 The Lakes Region Mental Health Center, Inc. staff:

- Information on The Lakes Region Mental Health Center, Inc. Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

The Lakes Region Mental Health Center, Inc. shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Insert resource/agency to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 603-524-1100 and request assistance from the Support Staff.

## “I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noui ñoõic Vieät Ngõõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian

	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

## Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
5/11/2023		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
3/16/2023		Chinese-Mandarin		Clinical Service Assistance			
11/10/2022		Vietnamese		Clinical Service Assistance		Support Staff and clinical staff	
10/14/2022		Spanish		Clinical Service Assistance		Support Staff and clinical staff	
8/2/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
7/06/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
3/10/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
2/24/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
2/16/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
1/28/2022		Spanish		Clinical Service Assistance		Support Staff and clinical staff	
1/27/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
1/13/2022		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	

12/29/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
12/02/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
11/18/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
11/11/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
11/04/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
9/30/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
9/23/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
9/22/2021		Chinese-Mandarin		Clinical Service Assistance		Support Staff and clinical staff	
8/24/2021		Korean		Clinical Service Assistance		Support Staff and clinical staff	

**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
[Insert Name of Committee/Board]						

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

B. The Lakes Region Mental Health Center, Inc. currently does not maintain a non-elected transit-related boards, committees, or councils.

### **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

The Lakes Region Mental Health Center, Inc. monitors subrecipients using the following process:

1. The Lakes Region Mental Health Center, Inc. uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. The Lakes Region Mental Health Center, Inc. collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

### **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

### **Section 12: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

The Lakes Region Mental Health Center, Inc.:

is a fixed route transit provider

is **not** a fixed route transit provider