



Title VI Policy

November 2021

North Country Council
161 Main Street, Littleton NH 03561

Table of Contents

1.0 TITLE VI POLICY STATEMENT.....	3
2.0 TITLE VI POLICY OBJECTIVES	4
3.0 PROGRAM REQUIREMENTS.....	5
3.1 Requirement to Prepare and Submit a Title VI Program.....	5
3.2 Requirement to Notify Beneficiaries of Protection Under Title VI.....	5
3.3 Requirement to Develop Title VI Complaint Procedures and Complaint Form.....	5
3.4 Requirement to Record and Report Title VI Investigations, Complaints, and Lawsuits.....	6
3.5 Requirement to Promote Inclusive Public Participation	6
3.6 Requirement to Develop a Demographic Profile of the Region.....	7
3.7 Requirement to Provide Meaningful Language Accessibility	7
3.8 Minority Representation on Planning and Advisory Bodies.....	10
3.9 Sub-recipients	10
3.10 Monitoring Sub-recipients	11
3.11 Requirement to Provide Additional Information Upon Request	11
APPENDIX A – TITLE VI NOTICE TO THE PUBLIC.....	12
APPENDIX B – TITLE VI COMPLAINT FORM AND INVESTIGATIVE PROCEDURES.....	13
Report of Title VI Investigations, Complaints, and Lawsuits	15
North Country Council Title VI Complaint Form.....	15
APPENDIX C – NORTH COUNTRY COUNCIL & TAC MEMBERSHIP.....	18
APPENDIX D – Contractual Agreement Language.....	19
Title VI Expectations.....	19
Pertinent Non-Discrimination Authorities.....	21

1.0 TITLE VI POLICY STATEMENT

It is the policy of the North Country Council Regional Planning Commission 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, 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 North Country Council. North Country Council will also monitor and enforce statutory requirements imposed on its sub-recipients and participants of Federally-assisted programs and projects. North Country Council further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

North Country Council operates without regard to race, color, national origin, sex, or income status. North Country Council 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 North Country Council meeting, please contact the North Country Council Executive Director at (603) 444 – 6303 EXT 2014, or by email: mmoren@nccouncil.org.

If you feel you have been discriminated against based on your race, color, national origin, sex, ability, or income status, you may file a complaint following the North Country Council Title VI Complaint Form (included as Appendix B of this document). If you cannot download the document, or need additional information, please feel free to contact North Country Council at (603) 444 – 6303 EXT 2014.

Alternatively, you may file a complaint by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Michelle Moren-Grey
Executive Director

Date

2.0 TITLE VI POLICY OBJECTIVES

North Country Council 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
- e) To ensure meaningful access to programs and activities by persons with limited English proficiency

3.0 PROGRAM REQUIREMENTS

As part of the North Country Council Title VI Program, North Country Council 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.

3.1 Requirement to Prepare and Submit a Title VI Program

This document constitutes the Title VI Program for North Country Council.

3.2 Requirement to Notify Beneficiaries of Protection Under Title VI

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

The public notice is posted at the North Country Council offices, and is accessible on the North Country Council website at <http://www.nccouncil.org/>. North Country Council's Notification of Protection is found on the following page in English, and may be requested in other languages.

English

North Country Council operates without regard to race, color, national origin, sex, creed, or income status. Regional Planning Commission 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 North Country Council meeting, please contact the North Country Council Executive Director at (603) 444 – 6303 EXT 2014, or by email: mmoren@nccouncil.org.

If you feel you have been discriminated against based on your race, color, national origin, sex, creed, ability, or income status, you may file a complaint using the North Country Council Title VI Complaint Form. If you cannot download the document or need additional information, please feel free to contact North Country Council at (603) 444 – 6303.

3.3 Requirement to Develop Title VI Complaint Procedures and Complaint Form

North Country Council has developed procedures for investigating and tracking Title VI complaints that may be filed against the regional planning commission and for making these procedures available to members of the public upon request. North Country Council sub-

recipients shall be required to have such procedures and shall be encouraged to adopt the regional planning commission's complaint investigation and tracking procedures.

A copy of North Country Council's Title VI Complaint Procedures and Title VI Complaint Form is included in Appendix B of this document. North Country Council's Title VI Coordinator is Michelle Moren-Grey, Executive Director, North Country Council, 161 Main Street, Littleton NH 03561.

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

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

North Country Council's form for recording this information is included in Appendix B 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.

North Country Council was designated by Governor Thomson Jr. in July 1973. Since the designation of the regional planning commission, there have been no Title VI complaints, investigations, or lawsuits filed against North Country Council.

3.5 Requirement to Promote Inclusive Public Participation

Public participation is vital to North Country Council. It helps provide the broadest spectrum of relevant information available prior to North Country Council's 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, North Country Council 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
- To prevent the denial of, reduction of, or significant delay in the receipt of transportation benefits by minority and low-income populations

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

North Country Council staff are directed to incorporate appropriate activities to make public communications and outreach a part of the agency's overall planning process. 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.

North Country Council 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 North Country Council to locate all in-person public meetings in facilities that are structurally accessible. In-person meetings of the Technical Advisory Committee (TAC) are held during available times at locations that are ADA accessible.

3.6 Requirement to Develop a Demographic Profile of the Region

Demographic information about the region can be found at:

<http://www.nccouncil.org/demographic-data/>

3.7 Requirement to Provide Meaningful Language Accessibility

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), North Country Council 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 describes 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;

North Country Council has undertaken an analysis of the languages spoken in the counties included in the North Country Council region, and the estimated number of residents with Limited English Proficiency and their distribution by language group.

The federal interagency website on Limited English Proficiency (LEP) (www.lep.gov) states that *“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 to language assistance with respect to a particular type or service, benefit, or encounter.”*

Based on this definition, a total of 2,371 individuals in Carroll, Grafton, and Coös Counties, or approximately 1.46% of the population, would be identified as having Limited English Proficiency. Divided among language groups, this includes 883 French speakers (0.54% of the population), 570 Spanish speakers (0.35% of the population), 190 speakers of Other Indo-European Languages (0.12% of the population), 556 speakers of Asian and Pacific Languages (0.34% of the population, primarily Chinese and Japanese), 155 speakers of Arabic (0.10% of the population), and 60 speakers of Other Languages (0.04% of the population).

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

Key points of contact between North Country Council and members of the public in the North Country Council region include the following: public hearings, other public meetings, the North Country Council website, inquiries with the North Country Council 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 North Country Council 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

A regional planning commission's regional planning activities impact every person in the North Country Council region to one degree or another. Projects reviewed by North Country Council and recommended to NHDOT for funding impact the safety and travel time for all members of the driving public. Similarly, North Country Council 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 low-income populations.

Describe the resources available to the recipient and costs

North Country Council's Unified Planning Work Program (UPWP) with the NHDOT would be the main source of financial resources available to the regional planning commission for expanding language access. The North Country Council website includes incorporated Google Translate technology. North Country Council anticipates that web-based technologies such as Google Translate will make the cost of document translation relatively modest. Live interpretation services are anticipated to be more costly.

In order to meet recent federal requirements in accommodating members of the public with limited English proficiency and additional language needs, North Country Council will provide the following accommodations:

- Seek language services through local community resources. North Country Council will attempt to match such services to particular needs of individuals attempting to effectively participate in the planning process.
- If local organizations are unable to provide such assistance for individuals with limited English proficiency, the following list of possible resources may be considered:
 - New Hampshire's Department of Education Directory of NH Translators (603) 271-3494 or (800) 735-2964 or <https://www.education.nh.gov/sites/g/files/ehbemt326/files/inlinedocuments/2020/translators-alphabetical.pdf>
 - Language Bank (603) 224-8111 or (844) 579-0610 or <https://www.thelanguagebank.org/> for on-site interpretation assistance
 - Language Line (800) 752-6096 or <https://www.languageline.com/contact-language-line-solutions>

- In cases where interpretation is needed for only written materials, Google’s online language translation tool may be helpful and can be accessed on the Internet at <https://translate.google.com/>.
- For individuals who rely on American Sign Language or who require deaf/blind interpretation, North Country Council may contact organizations such as, but not necessarily limited to, the following:
 - Northeast Deaf and Hard of Hearing Services (603-224-1850),
 - NH Association for the Blind (603-224-4039),
 - Disabilities Rights Center (603-228-0432) or
 - Governor’s Commission on Disabilities (603-271-2773).

North Country Council will attempt to accommodate those with low-English proficiency on an as-needed basis. North Country Council staff will strive to communicate plans, notices and policies to anyone who initiates contact. If a language barrier does arise, North Country Council will make efforts to find suitable resources to bridge the language gap.

3.8 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 transportation advisory and policy-making body for North Country Council is the Technical Advisory Committee (TAC). The TAC is made up of representatives from each North Country Council community plus representatives of State and Federal agencies. The individuals representing each of these municipalities or agencies are selected by those entities and are not chosen at the discretion of the regional planning commission or its staff. Full membership of the North Country Council TAC is detailed in Appendix C.

3.9 Sub-recipients

North Country Council 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.

North Country Council will collect Title VI Assurances from sub-recipients prior to passing through federal funds.

North Country Council may 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. Contractual agreements will include the

appropriate required clauses, found in Appendix D, as mandated by the Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), 49 C.F.R. Part 21, and 28 C.F.R. section 50.3.

3.10 Monitoring Sub-recipients

North Country Council 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.

The following notification will be included in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-aid Highway Program activities and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The NH DOT, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3.11 Requirement to Provide Additional Information Upon Request

North Country Council 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.

APPENDIX A – TITLE VI NOTICE TO THE PUBLIC

It is the policy of the North Country Council Regional Planning Commission 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, creed, ability, 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 Regional Planning Commission. The regional planning commission will also monitor and enforce statutory requirements imposed on any sub-recipients and participants of Federally assisted programs and projects. North Country Council further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of funding source.

The North Country Council Regional Planning Commission operates without regard to race, color, national origin, sex, creed, ability, or income status. Regional planning commission 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 North Country Council Regional Planning Commission meeting, please contact:

Michelle Moren-Grey
North Country Council
161 Main St
Littleton, NH 03561
PH: (603) 444-6303 EXT 2014
Email: mmoren@nncouncil.org

If you feel you have been discriminated against based on your race, color, national origin, sex, creed, ability, or income status, you may file a complaint using the North Country Council Title VI Complaint Form. If you cannot download the document or need additional information, please feel free to contact North Country Council at (603) 444-6303.

Alternatively, you may file a complaint by contacting the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

APPENDIX B – TITLE VI COMPLAINT FORM AND INVESTIGATIVE 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 North Country Council.

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 Regional Planning Agency 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:

Michelle Moren-Grey
North Country Council
161 Main St
Littleton, NH 03561
PH: (603) 444-6303 EXT 2014
Email: mmoren@nncouncil.org

Alternatively, written complaints may be filed directly with the Federal Transit Administration (FTA) at the following address:

FTA Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

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

- 1.) A formal complaint must be filed within one-hundred and eighty (180) days of the alleged occurrence. Complaints shall be in writing and signed by the individual or their 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, ability, income status), 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 North Country Council 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.) North Country Council will notify the NHDOT Title VI Coordinator of any formal Title VI complaint within five (5) 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 sixty (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 fifteen (15) business days from receipt of a complete complaint, North Country Council 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 their 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 North Country Council's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

7.) When North Country Council does not have sufficient jurisdiction, the Executive Director or their 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 their authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director within sixty (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 their authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) days from receipt of the complaint.

10.) If the Complainant is dissatisfied with North Country Council's resolution of the complaint, they have 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

Alternatively, if the Complainant is dissatisfied with North Country Council's resolution of the complaint, they have the right to file a complaint with the Federal Transit Administration at the following address:

FTA Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

[Report of Title VI Investigations, Complaints, and Lawsuits](#)

Since the designation of North Country Council, there have been no Title VI complaints, investigations, or lawsuits filed against the Regional Planning Commission.

[North Country Council Title VI Complaint Form](#)

The full form is on the next two pages.

North Country Council Title VI Complaint Form

North Country Council strives to ensure full and fair participation by affected populations in program decisions and ensure that policies and programs of North Country Council avoid producing disproportionately negative effects on people from disadvantaged backgrounds. If you wish to file a complaint, please complete the form below and explain as clearly as possible what happened and why you believe you were discriminated against.

Name:

Address:

Telephone Home:

Telephone Work:

Email Address:

Representative Name (if applicable):

Representative Relation to Complainant:

Representative Telephone:

Mailing Address:

City, State, Zip Code:

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

You were discriminated against on the basis of (check all that apply):

- | | | | |
|-------------------------------------|--|--|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Color | <input type="checkbox"/> Age | <input type="checkbox"/> Family Status |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Retaliation | <input type="checkbox"/> National Origin | <input type="checkbox"/> Sex |
| <input type="checkbox"/> Disability | <input type="checkbox"/> Income Status | <input type="checkbox"/> Other: | |

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.

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:

Michelle Moren-Grey

North Country Council

161 Main St

Littleton, NH 03561

PH: (603) 444-6303 EXT 2014

Email: mmoren@nncouncil.org

APPENDIX C – NORTH COUNTRY COUNCIL & TAC MEMBERSHIP

Name	Representation	Affiliation
Ben Gaetjens-Oleson	Lancaster	TAC
Bruce Caplain	Bethlehem	TAC
Carl Martland	Sugar Hill	TAC
Clayton MacDonald	Stratford	TAC
Derrick Carruthers	NCC	NCC
Donna Laurent	Jefferson	TAC
Doug Damko	Littleton	TAC
Doug Grant	Randolph	TAC
Glenn Coppelman	NCC	NCC
James Steele	NCC	NCC
Jared Cape	NCC	NCC & TAC
Jill Brewer	Franconia	TAC
Joe Chenard	Lincoln	TAC
Kaela Tavares	NCC	NCC
Katie Lamb	NCC	NCC & TAC
Mark Decoteau	Waterville Valley	TAC
Mark Dindorf	Hart's Location	TAC
Michelle Moren-Grey	NCC	NCC
Mikala Woods	NCC	NCC
Pam LeFlamme	Berlin	TAC
Paul Robitaille	Gorham	TAC
Raymond Gorman	Colebrook	TAC
Rick Hiland	Albany	TAC
Robert Larson	Whitefield	TAC
Robin Irving	Northumberland	TAC
Rosalind Page	Lisbon	TAC
Stacey Doll	NCC	NCC
Stanley Judge	Shelburne	TAC
Zak Mei	Easton	TAC

APPENDIX D – Contractual Agreement Language

Title VI Expectations

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

- 1. Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration (FHWA), as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
- 2. Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
- 3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
- 4. Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will

permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.

- 5. Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.

- 6. Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Pertinent Non-Discrimination Authorities

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC§ 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).