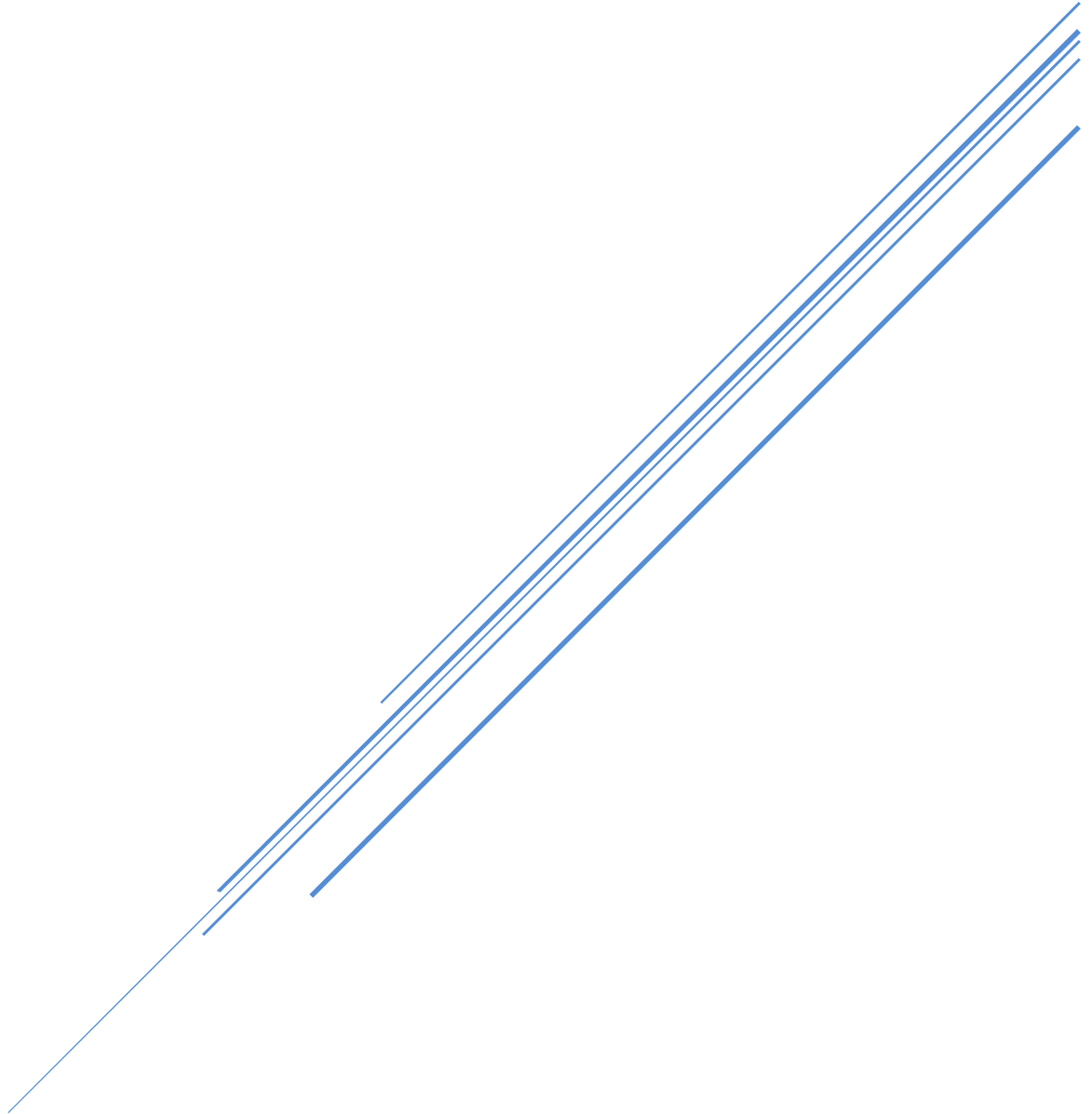


# CENTRAL NH REGIONAL PLANNING COMMISSION

Language Assistance Plan and Policy



To Ensure Nondiscrimination in all Programs and Activities  
Approved April 13, 2017

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For more information on Limited English Proficiency, Civil Rights and the Federal law, please visit <http://www.lep.gov/>.

Limited English Proficiency (LEP) individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English. LEP individuals include people in the process of learning English and may read, write, speak, or understand some English, but not sufficiently enough to communicate detailed information such as medical information, eyewitness accounts, or information elicited in an interrogation in English.

## I. Federal Law

Federal law prohibits national origin discrimination and requires meaningful access to LEP persons, including inmates, in federal and federally assisted programs and activities. Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” signed by the President on August 11, 2000, requires recipients of Federal funds to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

## II. Language Assistance Policy

It is the policy of the Central New Hampshire Regional Planning Commission (CNHRPC) to take reasonable steps to provide meaningful access to LEP individuals accessing services provided by CNHRPC. The policy is to ensure that language will not prevent staff from communicating effectively with LEP persons and that limited English proficiency will not prevent people from accessing services provided by CNHRPC. For more information about CNHRPC’s programs and services, visit [www.cnhrpc.org](http://www.cnhrpc.org). If information is needed in another language, please contact CNHRPC at (603)-226-6020 or email [jmock@cnhrpc.org](mailto:jmock@cnhrpc.org), or visit our administrative office at 28 Commercial St. Concord, NH from 8:30am – 4:30pm Monday thru Friday.

As of April 2017, the CNHRPC has not received any request to translate any document or report, or provide translation services at its Full Commission or Executive Committee meetings. Considering requests for language assistance have never occurred, a case-by-case approach shall be used to determine the most appropriate method for communicating with the LEP person.

The CNHRPC is dependent on each of the twenty municipalities it serves to provide language assistance services at the public meetings the CNHRPC staff attends and/or participates at for its member communities. In addition, the CNHRPC acts as a lead agency for funding purposes for several transportation providers such as the Community Action Program Belknap-Merrimack Counties Inc., each of these grant recipients maintain their own LEP policy and services.

## III. Services

CNHRPC has no-bilingual staff members as of 2017. The CNHRPC can take advantage of the following resources to provide assistance to LEP persons. Staff members will receive training on the language access policy, plan, and procedures. The CNHRPC can take advantage of the following resources to provide assistance to LEP members.

1. Adding Google Translate to our website.
2. The first staff contact should be: English for Speakers of Other Languages (ESOL) <http://www.second-start.org/>. Second Start, 17 Knight Street, Concord NH, 603-228-1341.
3. DHHS – New Hampshire Department of Health and Human Services Refugee Program. <https://www.dhhs.nh.gov/omh/refugee/services.htm> for assistance to refugee populations.
4. NH Directory of [Sign Language] Interpreters [http://www.education.nh.gov/career/vocational/documents/interp\\_guide.pdf](http://www.education.nh.gov/career/vocational/documents/interp_guide.pdf).
5. New Hampshire’s Department of Education 2013-2014 Directory of NH Translators, 603-271- 2034.
6. Family members: In many situations a family member, friend, or other volunteer may be the easiest and quickest form of language assistance. The CNHRPC does not deal with sensitive personal, medical or financial information so school age children in the family can be acceptable translators. It may be necessary, if there is the question of accuracy of the information being relayed, to require the services of a professional translator.

#### IV. Four Factor Analysis

The following Four-Factor Analysis is an individualized assessment that will serve as the guide for determining which language assistance measures CNHRPC may undertake to guarantee access to the CNHRPC programs while not imposing undue burden on CNHRPC.

**Factor 1: The proportion and number of LEP persons in the region is very small.** The 2007- 2011 ACS estimates that the percentage of people 5 years and older who speak a language other than English at home for Merrimack County, NH to be 1.8% or 2,514 individuals. The most reliable information on the LEP population is for Merrimack County. While Merrimack County is not coterminous with the Central New Hampshire Region, 18 of the 20 communities within the CNHRPC region are located within Merrimack County, and the two communities with the largest LEP populations in Merrimack County (Concord and Pittsfield) are within the CNHRPC region.

The ACS Data set is not particularly reliable for the smaller towns in the region since a single family moving into or out of the town could substantially change the estimated percent of the LEP population. The Central New Hampshire Region has a total population of 116,449 as compared to the overall Merrimack County population of 139,666.

The largest LEP language group in Merrimack County is “Other Languages” at 0.53%. The City of Concord has the region's highest percentage of those who speak a language other than English at home at 3.3%, with the next highest community being Pittsfield with 2.7%. The only communities with a LEP population of more than 1.0% are Concord, Pittsfield, Allenstown, Pembroke, Sutton, Bradford, and Chichester.

The following table is a summary of the estimated percentages of regional (Merrimack County) residents who have Limited English Proficiency by language type.

**Percentage of LEP Population of within Region by Language Type**

<b>Language Spoken at Home</b>	<b>Speak English Less than Very Well</b>
Other Languages	0.53%
French (incl. Patois, Cajun)	0.38%
Chinese	0.16%
Other African	0.12%
Spanish or Spanish Creole	0.11%
Korean	0.08%
Urdu	0.06%
Greek	0.05%
Other Indo-Euro	0.05%
Other Asian languages	0.05%
Serbo-Croatian	0.04%
German	0.04%
Russian	0.03%
Other Pacific Island	0.03%

**Factor 2: The frequency of contact between Limited English Speaking persons about planning services provided by CNHRPC is rare.** A canvas of the longest serving employees at CNHRPC has not indicated any contact with LEP individuals. The City Clerk for the City of Concord has advised that the City has not received a request for translation services in the last decade or more.

**Factor 3: The nature of planning services provided to member communities by the CNHRPC are not life threatening** which would allow a reasonable amount of time for translation services to be provided.

**Factor 4: Resources are available.** A variety of language assistance services are available, if and when needed. The most useful service will be Google Translate, since all Planning documents are posted in advance of any public hearing, along with agendas and meeting minutes, demographic data, traffic data, as well as regional and local maps

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Tyson Miller, Chair

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Michael Tardiff, Executive Director

Adopted April 13, 2017