



# **NHDOT Language Assistance Plan**

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## Commissioner's Statement on LEP

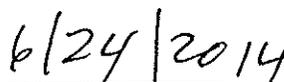
In fulfilling obligations under Title VI of the Civil Rights Act of 1964, it is the policy of the New Hampshire Department of Transportation (NHDOT) to take reasonable steps to ensure meaningful access to all critical programs and activities, regardless of one's ability to speak, read, write or understand English. This plan sets forth the extent to which language services will be offered by the Department to ensure inclusive public access to the programs, services, and activities that have critical impacts or offer critical benefits to the public. In a continuing effort to ensure an appropriate level of language access in programs offered by the Department, limited English proficient (LEP) populations will be identified and considered in the same manner as other traditionally underserved populations. Where a significant LEP population is affected by a NHDOT project, the outreach measures stated herein will be implemented to afford persons with LEP an equal opportunity to take part in public participation forums. Similarly, the Department will provide language access services for all other critical programs and activities that serve the general public.

The Title VI Coordinator will conduct an annual review of Department-wide programs, services, and activities, and the populations served by each. The results of each review will be evaluated with existing demographic data to determine the need for program changes.

Under the Director of Administration, the Title VI Coordinator is responsible for compliance monitoring and oversight, which includes advising all Bureaus and Districts and providing assistance in developing individualized measures. Directors and Administrators are responsible for taking reasonable steps to ensure that the measures prescribed in this document are carried out effectively.



\_\_\_\_\_  
Christopher D. Clement, Sr.  
Commissioner



\_\_\_\_\_  
Date

**Authority**

Executive Order (EO) 13166 - Improving Access to Services for Persons with Limited English Proficiency, August 2000 is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from engaging in unlawful discrimination based on national origin by failing to provide meaningful access to services to individuals who have LEP. This protection requires that people with LEP be provided an equal opportunity to benefit from or have access to services that are customarily provided in English.

There are two primary laws that require the Department to provide people with LEP with meaningful access to its programs, services, and activities. The following matrix illustrates the relationship between laws and implementation guidelines:

<b>Title VI of the Civil Rights Act of 1964</b>	<b>Limited English Proficiency Executive Order 13166</b>	<b>US DOT LEP Policy Guidance</b>
<ul style="list-style-type: none"> <li>• Federal law</li> </ul>	<ul style="list-style-type: none"> <li>• Federal policy</li> </ul>	<ul style="list-style-type: none"> <li>• US DOT Program Policy</li> </ul>
<ul style="list-style-type: none"> <li>• Enacted in 1964</li> </ul>	<ul style="list-style-type: none"> <li>• Signed August 2000</li> </ul>	<ul style="list-style-type: none"> <li>• Dated December 14, 2005</li> </ul>
<ul style="list-style-type: none"> <li>• Considers all persons</li> </ul>	<ul style="list-style-type: none"> <li>• Considers eligible population</li> </ul>	<ul style="list-style-type: none"> <li>• Population served</li> </ul>
<ul style="list-style-type: none"> <li>• Contains monitoring and oversight compliance review requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Contains monitoring and oversight requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Clarifies recipient obligations with respect to the "four factor analysis"</li> </ul>
<ul style="list-style-type: none"> <li>• Factor criteria is required, no numerical or percentage thresholds</li> </ul>	<ul style="list-style-type: none"> <li>• Factor criteria is required, no numerical or percentage thresholds</li> </ul>	<ul style="list-style-type: none"> <li>• Factor criteria is required, no numerical or percentage thresholds</li> </ul>
<ul style="list-style-type: none"> <li>• Provides protection on the basis of race, color, and national origin</li> </ul>	<ul style="list-style-type: none"> <li>• Provides protection on the basis of national origin</li> </ul>	<ul style="list-style-type: none"> <li>• Provides program guidance to US DOT recipients to ensure voluntary compliance with Title VI &amp; EO 13166</li> </ul>
<ul style="list-style-type: none"> <li>• Focuses on eliminating discrimination in federally funded programs</li> </ul>	<ul style="list-style-type: none"> <li>• Focuses on providing people with LEP with meaningful access to services using factor criteria</li> </ul>	<ul style="list-style-type: none"> <li>• Clarifies existing legal requirements and the extent to which "meaningful access" is required</li> </ul>

## **General Requirements**

As outlined in the US DOT's Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons, our agency has an obligation to take "reasonable steps" to eliminate language barriers that can preclude meaningful access to vital programs and services by people with LEP. The extent to which access is provided is determined by an individualized assessment that balances four factors: (1) The number or proportion of people with LEP eligible to be served or likely to be encountered by a program, activity, or service; (2) The frequency with which people with LEP come in contact with the program, activity or service; (3) the nature and importance of the program, activity, or service to people's lives; and (4) The resources available and the costs.

From this analysis, the appropriate mix of services and a reasonable extent to which they should be offered is determined. The following analysis was considered in determining the measures established by this plan:

## **Demographic Analysis**

### **A. Data Sources**

A demographic research was conducted using data available through the 2010 U.S. Census Bureau Online. In addition to the census tables' data from the 2008 - 2012 American Community Survey were considered:

#### **EXHIBIT I: LANGUAGES SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH LESS THAN VERY WELL**

#### **EXHIBIT II: SPEAKS ENGLISH LESS THAN VERY WELL BY COUNTY**

While Exhibit I contains data reflecting the statewide population in all language groups, Exhibit II is helpful in identifying Spanish speakers at the county level; this table depicts three other languages categories, each consisting of several language groups for which specific data was unavailable. This data indicates that the predominant LEP population is Spanish and concentrated in Hillsborough County. For projects where public outreach is conducted, data that is consistent with the LEP definition will be necessary to identify languages in which public notices and solicitations should be translated.

### **B. Demographic Profile (Statewide)**

Spanish and French language groups (in accordance with Exhibit 1) represent the largest portion of the general population who speak English "less than very well." On a statewide level, current demography shows that there are approximately 9,000 Spanish speakers and 6,000 French

speakers that spoke English less than very well. Assuming that all speakers in each category meet the definition of a person with LEP, approximately 0.72% Spanish and 0.5% French speakers in the general NH population (over age 5) would be either a Spanish speaking or a French speaking person with LEP. All other individual languages have an LEP level of less than 0.20%. Statewide the population that speaks English less than very well is 1.33%

The data at the county level for “individuals with the ability to speak English less than very well” may have more relevance to NHDOT activities. This table shows that Hillsborough County has the most significant linguistically isolated Spanish, Asian, and Indo-European language populations. While the Spanish-speaking group is homogenous, the Asian group contains 11 subcategories. Likewise, the Indo-European language group consists of 20 different languages; it is more than likely that French speakers comprise the majority in this category. Due to the broad categorical breakout, the Asian and Indo-European figures are not useful in determining the presence of a particular language group in a given area.

In general, the NHDOT can expect a higher, yet unpredictable, rate of encounter with members of the Spanish and French language groups. Although statistical data indicates that a higher percentage of speakers with LEP in these two language groups exists, anecdotal evidence in critical/compulsory activities, such as relocation assistance, shows no pattern of encounter with a specific language group. Furthermore, there is a high rate of encounter with French speakers who require oversize/overweight vehicle permits. However, these French (Canadian) speakers are regular customers who speak English as a second language with a level of difficulty that would not result in a delay of or the non-issuance of a permit. These individuals are also familiar with the permit process and requirements. Anecdotal evidence indicates substantially less than 1 incident per year where there has been difficulty in processing a permit request due to language proficiency.

### **Critical Programs and Language Assistance Measures**

#### **A. “Critical” Programs, Services, and Activities**

The latest analysis of all programs, services, and activities having an inherent interaction with the public was completed 2014. This analysis considered four (4) factors in determining the reasonable extent to which access shall be provided. Ultimately, a program, service, or activity with a demonstrated need for language services was deemed “critical,” as indicated by the US DOT Policy Guidance Concerning Recipients’ Responsibilities to LEP persons.

The following four factors were considered for each program or activity conducted by this Department:

1. The number or proportion of people with LEP served or encountered in the eligible service population. This information consisted of 2010 Census data relevant to the service area of each program or activity reviewed.

2. The frequency with which LEP individuals come in contact with the program, activity, or services. This information was based on anecdotal evidence and statistical records relating to previous encounters with people with LEP.
3. The nature and importance of the program, activity, or service. The major consideration for this aspect of the analysis was whether or not the program or activity is compulsory, voluntary, or informational. In the case of a service, the benefits of the service (or disadvantages of not having access to the service) were evaluated. Essentially the ramifications of a denial or delay in service were carefully considered.
4. Resources Available and Costs. For this factor, the number of multi-lingual employees available to serve as interpreters and provide basic translations when needed was considered. In addition, community agencies and community action programs, as well as other statewide resources were examined to determine the feasibility of sharing services or economies of scale. Finally, the budget source and estimated costs for the type(s) of services needed were evaluated.

Based on the information provided by each bureau, and in consideration of the four factors above, critical programs and services have been identified for which specific language access mechanisms will be established. While many programs and services were reviewed, it was determined that the following “critical” activities had the greatest implications:

- All Public Participation activities
- E-ZPass- application process f2f, Online, and via phone
- OS/OW Permits- Oversize and Overweight Vehicles
- ROW activities-relocation assistance and property acquisitions (f2f, brochures and pamphlets, and phone)

#### B. Language Assistance Measures by Program Area

Public Participation (10-year Planning Process). Pursuant to the STIP/10-year planning process, a series of Governor and Council Intermodal Transportation (GACIT) public hearings are held in various locations throughout the state in September of *odd* years. Each public hearing is concerned with specific projects within the region of the hearing location. The Bureau of Planning and Community Assistance will provide a list of the selected meeting locations depicting the area of interest and projects (by town) slated for discussion at each meeting. The Title VI Coordinator will use this information to conduct a demographic analysis showing each town affected by a planned project(s). The analyses will be in the same format as those routinely conducted for other NHDOT projects, with additional emphasis on language access and outreach where appropriate. The results of each analysis will be provided to the Project Manager with courtesy copies provided to principal Administrators and others as requested.

Public Participation (General). When an LEP population exceeding 5% or 1,000 people is affected by a transportation project, the lead person shall be responsible for contacting and coordinating outreach efforts using the resources provided in this program and the “Outreach Recommendations” provided in the EJ Population Analysis. First consideration should be given to the low-cost outreach source of community-based organizations that serve the targeted LEP group. These organizations can be instrumental in soliciting interest for public meeting/hearing attendance. In addition, organization members and leaders may be willing to attend meetings and serve as interpreters/translators to facilitate notification and participation of the affected language group. When this method is infeasible, consideration should be given to the translation of Public Hearing and Information Meeting Notices (for all NEPA Class I and Class III projects) in the appropriate language(s). Public Hearing and Information Meeting Notices should be translated and posted in locations most likely accessed or frequented by members of the target language group(s).

When Public Meeting and Hearing Notices in another language(s) are deemed necessary (NEPA Class I and III projects), the project manager or lead person will contact the Department’s Title VI Coordinator to locate a competent translator using the services of **Rapport International** as a resource.

All Notices translated in languages other than English shall contain contact information of the NHDOT employee assigned to respond to limited English callers. When feasible, this responsibility should be given to a person who is proficient in the targeted language; otherwise, the contact person should be someone trained in the use of available telephone translation services (e.g. the Title VI Coordinator).

The person responding to the caller with limited English should be prepared to relate the project scope and purpose of the public meeting or hearing. If the caller expresses an interest in attending a public meeting and requires a translator, the request will be forwarded to the title VI Coordinator and project manager or lead person, who will be responsible for procuring the required language service(s).<sup>1</sup>

E-ZPass. E-ZPass is a convenient toll collection technology that saves travelers money through discount plans. E-ZPass also helps reduce travel time due to traffic congestion normally resulting from conventional cash collection methods. Specifically, users of E-ZPass receive the following benefits:

- E-ZPass saves you money through automatic discount programs on many E-ZPass facilities.
- E-ZPass can process 250 to 300 percent more vehicles per lane, thus reducing toll plaza delays and traffic congestion.
- E-ZPass helps to reduce congestion and reduce auto emissions.
- E-ZPass helps reduce fuel consumption.

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<sup>1</sup> All language services purchased or contracted as a direct project cost shall be documented and reported to the Title VI Coordinator for statistical tracking and analysis.

To ensure language access to this service, the E-ZPass vendor provides telephone language interpretation services to people with LEP seeking an E-ZPass account, as well as for those requiring information on an existing account. If needed, the walk-in centers have access to the same language assistance services. The walk-in center in Nashua has 2 in-house employees that are fluent in Spanish. Typically E-ZPass provides language assistance on phone calls from customers 80-100 times a year.

Right of Way Activities - As a result of transportation improvement projects it is at times necessary for the state to acquire private property to expand or improve the existing transportation system. The NHDOT Bureau of Right of Way is responsible for the acquisition of property rights required for transportation projects, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 governs the process the Department follows. The Bureau is vigilant and strives to be sensitive to any situation where there is potential for discrimination and, where Title VI mandates, including the adherence to the directives of Executive Orders 13266 (LEP). There have been no LEP circumstances in Right of Way in the previous 5 years.

Documents Translations. The following public documents are considered to be *vital* as defined by the Federal LEP guidelines and should be readily available in Spanish. These documents should also be translated and distributed when no alternative is available and failure to provide the translation would prevent program access or result in a delay of service:

- *Having Your Say in Transportation Projects that Shape Your Community* - How to get involved.
- *Planning the Future of New Hampshire Transportation* - The planning processes, and how to participate.
- Project Development: *Making Transportation Projects a Reality* - The steps through approval, design and construction.
- Access Management - *The community benefit in planning points of access.*
- Transportation Enhancement Program - Federal-funded alternative transportation program.
- Congestion Management and Mitigation Program - Federally-funded program focused on air quality improvements.
- The Transportation/Land Use Relationship - The importance of the local and regional land use planning processes.
- Ten Year Transportation Improvement Plan Process Brochure
- Title VI Complaint Process and Public Notice are currently posted on NHDOT Website in Spanish
- A notice stating: “To ensure timely service and access to its programs, the NHDOT will provide free language assistance upon request to any member of the public....”
- Ride Match Application—or a notice in Spanish stating that translation services are available at no cost....”
- ROW-Title VI impacts survey

- Spanish Translation of this Language Assistance Plan

Program Areas in which information to the public is frequently provided via telephone or in person:

Records  
ROW Relocation #  
Permits  
Main number/receptionist for public hearings  
Main number/receptionist for public info meetings  
Traffic main #/receptionists  
Main receptionist

LEP Outreach/Notification Procedures. Posting of signs in intake areas/entry points, stating that language services are available in public notices and other informational documents (even in English); notice to certain community-based organizations.  
Notice that Interpretation Services will be provided at no cost.  
Cite specific language that should be used in cover letters for public meeting/hearing notices , should cover purpose of outreach and accommodations

In House Language Resources

Spanish - Samantha Fifield; Highway Design X1591  
French - Marc Laurin; Environmental X4044

External Resources 24/7 365 days translating and interpreting service

**Rapport International**  
**93 Moore Road**  
**Sudbury, MA 01776**  
**978-443-2540**  
**www.RAPPORTINTL.com**

Training. Personnel who have frequent contact with the public through which program/activity access is requested or granted. Training in the use of contracted telephone translation services. Training in basic (Spanish or French if deemed necessary) can arrange a class for daytime....  
Use of "I Speak cards"; general policy and procedure;

Subrecipient Requirements- the NHDOT Title VI Coordinator reviews subrecipients' Language Assistance Plans as part of their overall Title VI review. In meeting existing anti-discrimination requirements under Title VI with regard to minimizing adverse and disproportionate project impacts and ensuring inclusion of all affected people in public participation, regardless of race, color, and national origin, all recipients of federal assistance offered through the NHDOT shall be notified of their obligation to establish an LEP policy and to ensure meaningful language access as required by Executive Order 13166 and the U.S. Department of Transportation's LEP Policy Guidance dated December 14, 2005.

**EXHIBIT I: LANGUAGES SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH LESS THAN VERY WELL**

Languages	Number of Speakers	Spoke English less than "Very Well"	Percentage
<b>Population 5 years and over</b>	<b>1,237,068</b>	<b>16,513</b>	<b>1.33%</b>
Spoke only English at home	1,137,876	(X)	
<b>Spoke a language other than English at home</b>			
<b>SPANISH AND SPANISH CREOLE</b>	<b>26,559</b>	<b>8,923</b>	0.72%
<b>OTHER INDO-EUROPEAN LANGUAGES</b>	<b>55,151</b>	<b>13,618</b>	1.10%
French	27,990	6,126	0.50%
French Creole	398	237	0.02%
Italian	1,941	407	0.03%
Portuguese	4,425	1,739	0.14%
German	3,638	413	0.03%
<b>Other West Germanic languages</b>	<b>494</b>	<b>55</b>	0.00%
Dutch	400	55	0.00%
<b>Scandinavian languages</b>	<b>774</b>	<b>213</b>	0.02%
Greek	2,409	618	0.05%
Russian	1,860	566	0.05%
Polish	1,769	428	0.03%
<b>Serbo-Croatian languages</b>	<b>1,861</b>	<b>780</b>	0.06%
<b>Other Slavic languages</b>	<b>784</b>	<b>329</b>	0.03%
Armenian	195	36	0.00%
Persian	313	19	0.00%
Hindi	2,308	314	0.03%
Gujarati	704	244	0.02%
Urdu	183	21	0.00%
<b>Other Indic languages</b>	<b>1,895</b>	<b>658</b>	0.05%
Nepali	923	442	0.04%
<b>Other Indo-European languages</b>	<b>1,195</b>	<b>415</b>	0.03%
Romanian	435	90	0.01%
Irish Gaelic	63	25	0.00%
Albanian	319	238	0.02%
Lithuanian	326	40	0.00%
Lettish	52	22	0.00%
	<b>13,130</b>	<b>6,038</b>	0.49%

<b>ASIAN AND PACIFIC ISLAND LANGUAGES</b>			
Chinese	4,343	2,046	0.17%
Chinese	3,040	1,439	0.12%
Cantonese	643	218	0.02%
Mandarin	614	383	0.03%
Formosan	29	6	0.00%
Japanese	536	264	0.02%
Korean	961	702	0.06%
Mon-Khmer, Cambodian	666	292	0.02%
Thai	1,044	407	0.03%
Laotian	445	139	0.01%
Vietnamese	1,105	837	0.07%
<b>Other Asian languages</b>	<b>2,129</b>	<b>661</b>	<b>0.05%</b>
Turkish	279	238	0.02%
Mongolian	46	36	0.00%
Telugu	936	286	0.02%
Malayalam	189	48	0.00%
Tamil	542	25	0.00%
Burmese	67	19	0.00%
Tagalog	1,007	154	0.01%
<b>Other Pacific Island languages</b>	<b>894</b>	<b>536</b>	<b>0.04%</b>
Indonesian	689	514	0.04%
Malay	88	22	0.00%
<b>ALL OTHER LANGUAGES</b>	<b>4,352</b>	<b>1,208</b>	<b>0.10%</b>
Hungarian	333	91	0.01%
Arabic	1,798	593	0.05%
<b>African languages</b>	<b>1,568</b>	<b>488</b>	<b>0.04%</b>
Sudanic	221	145	0.01%
Swahili	320	158	0.01%
Bantu	434	42	0.00%
Kru, Ibo, Yoruba	394	109	0.01%

Source: U.S. Census Bureau, 2006-2008 American Community Survey



Exhibit II  
Speak English Less Than Very Well by County

Subject	Belknap County		Carroll County		Cheshire County		Coos County		Grafton County	
	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well
Population 5 years and over	57,198	0.9%	45,771	0.5%	73,362	0.8%	31,482	2.2%	84,915	1.8%
Speak only English	95.50%	(X)	97.30%	(X)	96.8%	(X)	87.4%	(X)	92.8%	(X)
Speak a language other than English	4.50%	20.0%	2.7%	18.3%	3.2%	26.5%	12.6%	17.1%	7.2%	24.9%
Spanish or Spanish Creole	0.70%	16.8%	0.5%	0.0%	0.9%	30.0%	0.6%	27.0%	1.4%	28.2%
Other Indo-European languages	3.00%	19.7%	1.7%	17.9%	1.7%	21.5%	11.6%	16.8%	3.3%	14.5%
Asian and Pacific Island languages	0.70%	26.6%	0.4%	48.5%	0.5%	42.7%	0.3%	14.5%	1.9%	32.3%
Other languages	0.10%	0.0%	0.0%	0.0%	0.2%	13.2%	0.1%	0.0%	0.5%	53.5%
Speak a language other than English										
Spanish or Spanish Creole	374	16.8%	245	0.0%	646	30.0%	204	27.0%	1,222	28.2%
5-17 years	151	23.8%	81	0.0%	123	9.8%	18	27.8%	224	38.8%
18-64 years	196	13.8%	129	0.0%	506	33.6%	177	24.9%	925	27.9%
65 years and over	27	0.0%	35	0.0%	17	70.6%	9	66.7%	73	0.0%
Other Indo-European languages	1,728	19.7%	792	17.9%	1,237	21.5%	3,659	16.8%	2,779	14.5%
5-17 years	181	7.7%	47	4.3%	211	21.3%	258	1.9%	403	13.9%
18-64 years	861	22.0%	471	12.3%	727	20.6%	1,849	15.9%	1,827	10.8%
65 years and over	686	20.0%	274	29.9%	299	23.7%	1,552	20.2%	549	27.3%
Asian and Pacific Island languages	406	26.6%	169	48.5%	337	42.7%	83	14.5%	1,636	32.3%
5-17 years	8	0.0%	35	0.0%	25	32.0%	38	0.0%	184	24.5%
18-64 years	364	27.5%	134	61.2%	296	45.9%	45	26.7%	1,402	32.3%
65 years and over	34	23.5%	0	-	16	0.0%	0	-	50	60.0%
Other languages	41	0.0%	17	0.0%	114	13.2%	23	0.0%	445	53.5%
5-17 years	38	0.0%	0	-	0	-	1	0.0%	86	50.0%
18-64 years	0	-	17	0.0%	99	0.0%	7	0.0%	355	54.9%
65 years and over	3	0.0%	0	-	15	100.0%	15	0.0%	4	0.0%
Citizens 18 years and over										
All citizens 18 years and over	46,888	0.6%	38,303	0.3%	61,084	0.6%	26,382	2.2%	69,940	0.9%
Speak only English	96.10%	(X)	97.8%	(X)	97.6%	(X)	86.9%	(X)	95.3%	(X)
Speak a language other than English	3.90%	14.7%	2.2%	14.3%	2.4%	24.2%	13.1%	16.8%	4.7%	18.6%
Spanish or Spanish Creole	0.50%	8.4%	0.4%	0.0%	0.7%	28.2%	0.6%	25.6%	1.2%	22.2%
Other languages	3.40%	15.5%	1.7%	17.8%	1.8%	22.6%	12.4%	16.4%	3.6%	17.4%

Exhibit II

Speak English Less Than Very Well by County

Subject	Hillsborough County		Merrimack County		Rockingham County		Strafford County		Sullivan County	
	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well	Pop Est	Speaks English < very well
Population 5 years and over	377,445	4.6%	139,187	1.5%	280,843	1.7%	116,579	2.0%	41,320	0.8%
Speak only English	87.4%	(X)	94.8%	(X)	93.5%	(X)	93.2%	(X)	96.9%	(X)
Speak a language other than English	12.6%	36.4%	5.2%	28.6%	6.5%	26.9%	6.8%	29.3%	3.1%	25.2%
Spanish or Spanish Creole	4.0%	41.9%	0.9%	20.2%	1.9%	31.0%	1.3%	25.0%	0.8%	21.8%
Other Indo-European languages	6.1%	29.1%	3.6%	29.4%	3.0%	19.8%	3.5%	24.3%	1.7%	23.0%
Asian and Pacific Island languages	1.7%	45.8%	0.4%	38.8%	1.2%	43.2%	1.7%	43.4%	0.5%	38.8%
Other languages	0.8%	44.0%	0.3%	29.8%	0.5%	14.6%	0.2%	25.1%	0.1%	12.0%
Speak a language other than English										
Spanish or Spanish Creole	14,926	41.9%	1,219	20.2%	5,228	31.0%	1,555	25.0%	325	21.8%
5-17 years	3,952	24.1%	368	24.5%	1,032	28.9%	215	9.3%	96	2.1%
18-64 years	10,371	47.6%	755	17.4%	3,865	30.0%	1,209	24.9%	221	31.2%
65 years and over	603	59.9%	96	26.0%	331	48.6%	131	51.9%	8	0.0%
Other Indo-European languages	23,015	29.1%	5,047	29.4%	8,353	19.8%	4,121	24.3%	699	23.0%
5-17 years	2,390	15.9%	569	9.5%	928	7.7%	390	31.5%	87	0.0%
18-64 years	14,524	30.6%	3,522	33.7%	5,445	19.1%	2,401	21.9%	331	13.9%
65 years and over	6,101	30.4%	956	25.5%	1,980	27.5%	1,330	26.5%	281	40.9%
Asian and Pacific Island languages	6,597	45.8%	570	38.8%	3,291	43.2%	2,031	43.4%	214	38.8%
5-17 years	893	18.8%	67	29.9%	699	5.6%	416	16.1%	37	83.8%
18-64 years	5,172	46.8%	453	39.5%	2,405	51.4%	1,524	49.2%	177	29.4%
65 years and over	532	81.0%	50	44.0%	187	78.6%	91	71.4%	0	-
Other languages	3,170	44.0%	410	29.8%	1,270	14.6%	271	25.1%	25	12.0%
5-17 years	989	50.7%	79	20.3%	338	11.2%	68	0.0%	0	-
18-64 years	2,058	41.3%	325	32.6%	846	11.7%	183	37.2%	7	0.0%
65 years and over	123	37.4%	6	0.0%	86	55.8%	20	0.0%	18	16.7%
Citizens 18 years and over										
All citizens 18 years and over	292,405	2.6%	112,633	0.8%	224,338	1.3%	95,619	1.2%	34,092	0.6%
Speak only English	90.7%	(X)	96.2%	(X)	94.6%	(X)	94.8%	(X)	97.5%	(X)
Speak a language other than English	9.3%	27.6%	3.8%	21.7%	5.4%	24.7%	5.2%	23.8%	2.5%	22.2%
Spanish or Spanish Creole	2.5%	30.0%	0.7%	18.3%	1.7%	26.8%	1.2%	26.5%	0.4%	0.0%
Other languages	6.8%	26.7%	3.1%	22.4%	3.7%	23.8%	3.9%	23.0%	2.1%	26.2%

## **Glossary of Terms**

**Vital documents-** A document made available to the general public containing information regarding rights or services offered to any member of the public under a transportation program or activity

**People with LEP-** Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English and, therefore, are entitled to language assistance under Title VI with respect to a particular type of service, benefit, or encounter.

**Critical program, service, or activity-** The programs, services, or activities rendered to the public as part of the core transportation functions of the Department where no benefit or a delay in service would result in exclusion from the program or other tangible loss.

