

Ewing Township Seniors Discrimination Policy

Ewing Township Senior Citizens operates its programs and services without regard to race color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint in writing to Ewing Township Senior Citizens. To file a complaint, or for more information on Ewing Township Senior Citizens obligations under Title VI write to: Ewing Township Seniors, 999 Lower Ferry Road, Ewing, New Jersey or visit www.ewingnj.org. Transportation services provided by this agency are in whole or part funded through FTA and as an individual you also have the right to file your complaint under Title VI to Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, D C 20590.

If information is needed in another language, contact (609-883-1776 Extension #1).

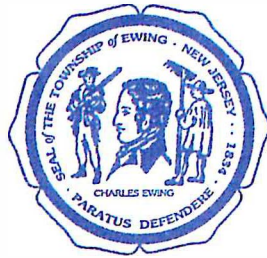
No Ewing Discrimination Política

Ewing Township Senior Citizens opera sus programas y servicios sin importar la raza de color, u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964, según enmendada. Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja o para obtener más información sobre las obligaciones de Ewing Township Senior Citizens en el Título VI de escritura a: Ewing Township Seniors, 999 Lower Ferry Road, Ewing, New Jersey 08628, o visitar www.ewingnj.org. Servicios Transportation de esta agencia son total o parcialmente financiado a través de TLC y como persona también tiene el derecho de presentar su queja bajo el Título VI de la Administración Federal de Tránsito, en el TLC Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

Si se necesita información en otro idioma, el contacto (609-883-1776 #1).

THE TOWNSHIP OF EWING

Municipal Complex
2 Jake Garzio Drive
Ewing, NJ 08628



Phone: (609) 883-2900
Admin. Fax (609) 538-0729
Clerk Fax (609) 771-0480
Web Address: www.ewingtwp.com
E-Mail: ewingadmin@ewingtwp.com

3

Ewing Township Senior Citizens

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Ewing Township Senior Citizens (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Ewing Township Senior Citizens investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has (7) seven days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has (7) seven 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 (7) seven business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two 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. An 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, she/he has **7 (seven)** days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

THE TOWNSHIP OF EWING

Municipal Complex
2 Jake Garzio Drive
Ewing, NJ 08628



Phone: (609) 883-2900
Admin. Fax (609) 538-0729
Clerk Fax (609) 771-0480
Web Address: www.ewingtwp.com
E-Mail: ewingadmin@ewingtwp.com

4

Ewing Township Senior Citizens Procedimiento de Quejas del Título VI

Cualquier persona que cree que él o ella ha sido objeto de discriminación por motivos de raza, color u origen nacional Ewing Township Senior Citizens (en lo sucesivo, "la Autoridad") puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI de la agencia. Ewing Township Senior Citizens investiga las quejas recibidas no más de 180 días después del supuesto incidente. La Agencia Estatal de procesar las quejas que se han completado.

Una vez recibida la denuncia, la Autoridad revisará para determinar si nuestra oficina tiene jurisdicción. El denunciante recibirá una carta de reconocimiento a él / ella informar si la denuncia será investigada por nuestra oficina.

La Autoridad tiene **(7) siete** días para investigar la denuncia. Si se necesita más información para resolver el caso, la Autoridad podrá ponerse en contacto con el denunciante. El demandante tiene **(7) siete** días hábiles desde la fecha de la carta para enviar información solicitada al investigador asignado al caso. Si el investigador no está en contacto con el denunciante o no recibe la información adicional dentro de **(7) siete** días hábiles, la Autoridad puede cerrar administrativamente el caso. Un caso puede ser administrativamente cerrado también si el demandante ya no desea seguir su caso.

Después de que el investigador revisa la queja, él / ella emitirá una de las dos cartas al demandante: una carta de cierre o una carta de encontrar (LOF). Una carta cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume los hechos denunciados y las entrevistas sobre el supuesto incidente, y explica si cualquier acción disciplinaria, la formación adicional del funcionario u otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene **(7) siete** días después de la fecha de la carta o la LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en TLC Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

Title VI Complaint Form

Note: The following information is needed to assist in processing your complaint.

A. Complainant's information:

Date: _____
Name: _____
Address: _____
City/State/Zip Code: _____
Telephone Number (Home): _____
Telephone Number (Work): _____
Email Address: _____

Accessible Format Requirements? (Select One or More)

- Large Print
- TDD
- Audio Tape
- Other

B. Person discriminated against (if someone other than complainant):

Name: _____
Address: _____
City/State/Zip Code: _____
Telephone Number (Home): _____
Telephone Number (Work): _____
Email Address: _____

Relationship to 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

C. Which of the following best describes the reason you believe the discrimination took place?

___ Race ___ Color ___ National Origin

Other: _____

D. On what date(s) did the alleged discrimination take place?

Date: _____
Date: _____
Date: _____
Date: _____
Date: _____

Other: _____

Título VI Formulario de Queja

Nota: La siguiente información es necesaria para ayudar en la tramitación de su queja.

Información de A. Denunciante:

Fecha: _____

Nombre: _____

Dirección: _____

Ciudad / Estado / Código Postal: _____

Número de teléfono (Inicio): _____

Número de Teléfono (Trabajo): _____

Dirección De Correo Electrónico: _____

Requisitos formato accesible? (Seleccione una o más)

o la ampliación de foto

o TDD

o cinta de audio

o Otros

B. persona discriminada (si alguien que no sea querellante):

Nombre: _____

Dirección: _____

Ciudad / Estado / Código Postal: _____

Número de teléfono (Inicio): _____

Número de Teléfono (Trabajo): _____

Dirección De Correo Electrónico: _____

Relación con la persona a la que se quejan: _____

Por favor, explique por qué usted ha presentado para un tercero:

Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.

o Sí

o No

C. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación?

_____ Race _____ Color _____ National Origen

Otros:

D. ¿En qué fecha (s) ocurrió la supuesta discriminación ocurrió?

Fecha: _____

Fecha: _____

Fecha: _____

Fecha: _____

Fecha: _____

Otros: _____

E. Por favor, describa la supuesta discriminación. Explique lo que pasó y quien considera que fue responsable. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si necesita espacio adicional, agregue una hoja de papel.

F. ¿Ha presentado esta queja ante cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal? Listar todos los que aplican .

Federal Agency _____

Tribunal Federal _____

Agencia Estatal _____

Tribunal Estatal _____

Agencia Local _____

Si ha comprobado anteriormente, proporcione información acerca de una persona de contacto en la agencia / tribunal donde se presentó la denuncia.

Nombre: _____

Título: _____

Dirección: _____

Ciudad / Estado / Código Postal: _____

Número de teléfono (Inicio): _____

Número de teléfono (Inicio): _____

Número de Teléfono (Trabajo): _____

Dirección De Correo Electrónico: _____

G. Por favor firme abajo. Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma _____ Fecha _____

Adjuntos: Si _____ No _____

H. Envíe el formulario y cualquier información adicional a:

INSERT APROPIADO información de contacto aquí:

Ewing Seniors
Ewing Senior & Community Center
999 Lower Ferry Road - #204
Ewing, New Jersey 08628
Attention: Senior Transportation

All subrecipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the subrecipient.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

The sample below is provided for the purposes of guidance only.

SAMPLE List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

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

Public Participation Plan

Ewing Township Senior Citizens complies with Federal Transit Law 49 United States Code (USC) Chapter 53, Section 5307 (d)(1)(I) by developing a locally written process for soliciting and considering public comment before raising a fare or carrying out a major service reduction. In addition, the following public outreach and participation plan meets the requirements of U.S. DOT Order 5610.2(a), Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, FTA C 4703.1 Environmental Justice.

Ewing Township Senior Citizens employs several means to communicate to the general public regarding the activities it performs including LEP (limited-English proficient) and minority populations. The communication activities may focus in different mediums depending on the program or population affected. These include but are not limited to:

Public Information and Notifications

Ewing Township Senior Citizens publishes notices, brochures and tables regarding Ewing Township Senior Citizens' proposals and programs, including how the public can obtain information and make comments, where meetings are to take place, and other applicable information. The notices for public input are posted 30 days in advance so the public has time to consider proposals and make comments. The notice methods include:

- Press releases to local and state media
- Customer newsletters (print and e-mail)
- E-mail blasts and alerts via text or e-mail
- Website links and articles
- On bus advertising with interior cards, exterior bus banners, onboard enunciator, and TV monitors on partial bus fleet
- Rack cards "take ones" placed on the bus and racks throughout (NAME OF AGENCY) transit centers
- Transit Center posters and brochures
- Spanish translation services and translated materials including fare media signs, day and family pass rack cards, system map information, bus hailer kits, translation assistance cards, critical notifications and forms such as Title VI notice and application forms
- Radio, television or newspaper ads considering stations and publications that serve LEP and minority populations

Meeting Locations

Ewing Township Senior Citizens meets with the public in locations that have convenient access to transit and are centrally located so that anyone in its service area can attend meetings and receive information about any Ewing Township Senior Citizens' activities that will impact them, especially LEP and minority populations. Meetings are held at several different times of the day for easier access. All public meeting locations will be accessible to those with disabilities. If notified five (5) days prior to the meeting, language or hearing interpreters will be made available.

Public Meeting Forums

On critical issues such as major service changes, Ewing Township Senior Citizens will organize and conduct public meetings that utilize one-on-one interviews with customers. Ewing Township Senior Citizens' staff will prepare proposals in sufficient detail and make available prior to the meeting for interested individuals. If the proposal involves service changes, maps are made available. Since each customer can be affected differently than another customer, obtaining comments this way allows for an individualized response to an individual need. Ewing Township Senior Citizen's staff will conduct personal interviews and transcribe oral comments if written comments are not possible. Meetings will have sign-up sheets available and if no one is in attendance, staff will wait for 10 minutes and then announce the reason

for the meeting, a statement that no one is in attendance and close the meeting. Customers are also able to leave audio messages on an advertised phone number prior to the advertised deadline for public feedback and the comments are transcribed for Ewing Township Senior Citizens' analysis along with all public feedback received. The public comments are presented at Senior Citizen Advisory Commission so that they are part of the decision-making process.

Website

The Township of Ewing's (Ewing Township Senior Citizens) website provides round-the-clock information on the Ewing bus service. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. Ewing Township Senior Citizens' press releases and customer newsletters are published on the site. The site needs to have a link to Google Translation for on demand translation to Spanish or any other language. Clients are also notified by telephone of cancellations.

Community Events

Ewing Township Senior Citizens' staff members regularly participate in community events that are not specific to public transit such as ethnic festivals, arts and music events, or events that promote a specific community or district. Ewing Township Senior Citizens staffers man a display booth and provide information on public transit activities and review customer feedback.

Information Tables

When Ewing Township Senior Citizens wants to advise the public of specific projects that will have a direct impact on riders, Ewing Township Senior Citizens' staff will conduct personal interviews at the major downtown transit center and transcribe oral comments or assist customers with computer surveys to receive customer input.

Outreach to Community Groups

Ewing Township Senior Citizens will continue to meet with community groups and social service agencies to listen to community concerns on the effects of fare changes to low-income and minority populations. Ewing Township Senior Citizens has associations with Mercer County T.R.A.D.E., Mercer County Transportation Coalition, Aging & Disability Recourse Connections, Ewing Independent Living, Hollowbrook Community Center, Ewing Senior and Community Center and Mercer County Nutrition, all of which assist LEP persons.

Jurisdictional Meetings

Ewing Township Senior Citizens will conduct an extensive outreach program with jurisdictions throughout its service area. Over 4 meetings annually will be conducted to gather meaningful feedback on current transit needs issues, offer information about the services Ewing Township Senior Citizens provides, and enhance relationships with our stakeholders.

Language Assistance Plan

EWING TOWNSHIP SENIOR CITIZENS

Language Assistance Plan (LAP) to Address Service to Individuals with Limited English Proficiency

The Ewing Township Senior Citizens is responsible for the management of the Municipalities' Senior Paratransit Bus Service. The County is the Primary Recipient of funds from the Federal Transit Administration (FTA) for the purpose of providing public transportation. Sub-Recipients within the County receive their FTA funds for public transportation through the County. The sub-recipients include the service area for the Ewing Township Senior Citizens' Paratransit Bus service, a private company providing public bus service. This Language Assistance Plan (LAP) applies to the Ewing Township Senior Citizens' service area services and to the public services of the Sub-Recipients.

This document has been prepared to conform to the Limited English Proficiency (LEP) requirements identified in the U.S. Department of Transportation's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." This document is also consistent with Title VI of the Civil Rights Act of 1964 and the U.S. Department of Justice's guidelines on self-assessment, which are contained in the Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs (May 2011).

The Ewing Township Senior Citizens uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps Ewing Township Senior Citizens communicate effectively with persons with LEP or low-literacy. The Four Factor Analysis considers the following components:

- 1) The number or portion of LEP persons eligible to be served or likely to be encountered by Ewing Township Senior Citizens
- 2) The frequency with which LEP persons come into contact with Ewing Township Senior Citizens
- 3) The nature and importance of Ewing Township Senior Citizens activities, programs and services to people's lives.
- 4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The following sections describe the application and results of the four factor analysis for Ewing Township Senior Citizens

1. Description of the Limited English Proficient Population(s) Served

The Ewing Township Senior Citizens system serves the residents within the Ewing Township Senior Citizens service area. The Ewing Township Senior Citizens paratransit bus service operates between various points in the service area to the community of Ewing; traveling to entities in Lawrence Township, the City of Trenton border area, Mercer County Airport and West Trenton Train Station. . For the purpose of this document, the study area includes all of Township of Ewing service area.

American Community Survey 5-Year Estimates from 2009- 2013 reveal that at the Township level, while there are numerous languages spoken at home, there are six (6) languages spoken where more than 858 people speak English less than very well. Those six (6) languages are included in the following table.

Table 1: Languages at the Municipal Level

Source: American Community Survey, 5-Year Estimates, 2012-2013. It is noted that this data categorizes Limited English Proficiency as persons who speak English "less than very well", which includes residents who speak English "well", while LEP is generally considered persons who speak English "not well" or "not at all".

Geographic Distribution of Total Population with Limited English Proficiency

At the time of the 2012 American Community Survey, **Ewing Township Senior Citizens service area** had a total population of 34,710 of whom 34,298 were individuals age 5 years and older. Of this population, 84.5 percent speak only English, while the remaining 15.5 percent speak other languages, either in addition to or instead of English. In **Ewing Township Senior Citizens service area**, 2.47 percent of the total population represent the LEP population; that is, English is not their primary language and they speak English "not well" or "not at all." This compares to the State LEP population of 12.4 percent.

Language Spoken	Number that speak English less than very well (estimated)	Percentage that speak English less than very well
Spanish or Spanish Creole	395	1.14%
French Creole	172	0.50%
Polish	132	0.38%
Other Slavic Languages*	101	0.29%
Chinese	34	0.10%
Korean	24	0.07%

Distribution of Population with Limited English Proficiency by Language or Language Group

Much like the State overall, the largest share of the LEP population in **Ewing Township Senior Citizens service area** speaks Spanish as their primary language. Statewide, 19.3 percent of the LEP population ages five (5) and older are Spanish-speaking. In **Ewing Township Senior Citizens service area**, 32.6 percent of the LEP population ages five (5) and older speak Spanish as their primary language. This group represents 5.0 percent of the Township's total population ages five (5) and older.

Spanish

In 2006-2010, The American Community Survey 5 year Estimates documents the Ewing Township's Population aged 5 years and older as follows: 6.0 percent spoke Spanish or Spanish Creole. Bi-language Individuals speaking English very well are estimated to be 70-.1 percent of the Township's population. A total of 29.9 percent spoke English less than very well.

Other Languages

According to the 2006-2010 American Community Survey 5-Year Estimates, LEP persons residing in the Township speak "other Indo-European" languages range from 32.3 percent of the LEP population.

LEP residing in the Township speaking Asian and Pacific Island languages 24.6 percent spoke English less than very well. The Census lists LEP persons who speak other languages but English less than very well as 19.2 percent of the Township's population.

2. Frequency of Use by the Limited English Proficient Populations

Individuals with limited English proficiency inquire about use and are affected by service that Ewing Township Senior Citizens –Ewing Seniors provides on a daily basis. Operational services include flexible route service and ADA paratransit service. Individuals with limited English proficiency also come into contact with Ewing Township Senior Citizens-Ewing Seniors by calling the main office telephone line, visiting the facility, and using the website. A significant part of the development of the Ewing Township Ewing Seniors Language Assistance Plan is the assessment of major points of contact, which include, but are not necessarily limited to, the following:

- ◆ Riding flexible route, paratransit and commuter buses
- ◆ Communication with customer service staff
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public meetings and events
- ◆ Paratransit reservation agents (Staff)
- ◆ Local news advertising (print)
- ◆ Service-related posters at **Ewing Township Senior Citizen – Ewing Senior pick up locations**

Employees

The Senior Office team members at the Ewing Senior and Community Center rarely encounter clients or potential clients that do not speak English. It has been our experience that if a client is not able to comprehend English a relative or friend acts as an interpreter.

Spanish, Igbo/Ebo and American Sign Language for the Deaf are languages most often encountered by **Ewing Township Senior Citizens, Ewing Senior** employees. To date, the staff has been “very effective” in their ability to communicate with non-English speakers.

The most commonly requested information from non-English speakers was schedule a ride.

Most interactions between the **Ewing Township Senior Citizens** and passengers with Limited English Proficiency (LEP) are face-to-face. Interaction with passengers also takes place over the phone. Only English speaking clients have communicated with us via email or letter.

Community Partner Survey

Ewing Township Senior Citizens will identify at least a half dozen community partners who interact with the LEP population. In networking with them the agencies will be asked to respond to a list of questions to estimate the percent of clients they interact with those who have Limited English Proficiency. The following questions will be answered by each of the future partners:

- 1) Do you encounter non-English speaking/reading people who need your services?
- 2) If so, what are the top three languages that you encounter?
- 3) How do you address language barriers?
- 4) Do you find language to be a barrier in preventing you from providing service?

Table 2: Community Partner Survey Results to be completed.

Community Partner	Do you encounter non-English speaking/ reading people?	Top three languages that you encounter?	How do you address language barriers?	Do you find language to be a barrier in preventing you from providing service?
Ewing Independent Living	Yes	Spanish	Uses staff member to translate	Language is an ongoing challenge, but not a barrier.
Mercer County Nutrition	Yes	Spanish, Ebo	Relative or Friends assist	“
Mercer County TRADE	Yes	Spanish, Chinese, Indian	Have an arrangement with Language Line. They provide telephone translation	“
Hollowbrook Community Center	Yes	Spanish Ebo	Usually a relative will translate for the client.	“
Park Place	Yes	Spanish, Mandarin	Usually a relative or an outside source will translate	“

The Ewing Senior Citizens conducted a passenger origin-destination survey. The survey will asked passengers detailed questions about the Ewing Township Senior Citizens service. The survey asked passengers to indicate their proficiency with the English language and what language they primarily speak at home.

According to the survey results, we identified passengers for whom English was not their primary language. Survey results make us aware of language (other than English) spoken and enabled us to establish a foundation of communication for LEP clients.

Exhibit 3: Ewing Township Senior Citizens Passengers Who Speak English Not Well or Not at All, 2011 and 2012

Primary Language	2011 Survey English Ability Not Well or Not at All		2012 Survey English Ability Not Well or Not at All	
Spanish		2		3
Ibo		2		2
French		2		1
Hindu		2		2
Italian		0		1
Total Completed Surveys		8		9

Source: **The Ewing Senior Citizens** Passenger Surveys

3. Importance of The Ewing Senior Citizens to People's Lives

Access to the services provided by **The Ewing Senior Citizens** is critical to the lives of many who depend on **The Ewing Senior Citizens** for access to essential services, maintaining independence and enhancing quality of life.

Trip Purpose for Riders with Limited English Proficiency, 2013

Riders (91 Clients) without Limited English Proficiency challenges utilized our transportation for the following trips:

- Health/ Medical – 11.5 percent
- Recreational – 44.74 percent
- Travel/Train Station – 0.04 percent
- Grocery Shopping – 14.95 (or 15.0) percent
- Bank – 0.49 percent
- Pharmacy – 0.24 (0.25) percent
- Mall – 0.575 (0.58) percent
- Rides Home – 27 (26.6) percent

Out of 93 Clients for the year 2013 only a total of 2 Riders fell under the LEP Category.

The Ewing Senior Citizens understands that if Limited English Proficiency or low-literacy is a barrier to using **The Ewing Senior Citizens** services, then the consequences for the individual could limit a person's access to obtain necessary medical care, recreational or education. The low number of LEP Clients as apposed to the English speaking clients demonstrates the need to strengthen outreach and inform LEP Communities. Vital information that can affect a person's access to **The Ewing Senior Citizens** services includes the following:

Types of Vital Information

- ◆ Scheduling process for transportation
- ◆ Gratis Transport for Ewing Seniors, Disabled , etc.

- ◆ Service Announcements
- ◆ Safety and security announcements
- ◆ Complaint and comment forms

4. Providing Language Assistance for Relevant Programs, Activities and Services

The Ewing Senior Citizens will utilize Translation Technology and reach out to other Sub recipients. Providing information in Spanish at The Ewing Senior Citizens telephone information line, and translates all informational flyers, notices, and other information for The Ewing Senior Citizens. This information is to be posted at the Ewing Senior and Community Center bus stops and on all buses. Ongoing passenger origin-destination survey will be conducted on the Ewing Senior Citizens paratransit bus.

A list of organized languages spoken will be generated so that Ewing Seniors employees may quickly reference speakers of a certain language when necessary. Employees can then direct telephone calls to a list of people that will assist them. For items in a word-processed format, it is the goal to use Google Translate which will be provided for all languages on The Ewing Senior Citizens website www.ewingnj.org.

Informational presentations involving access to public transportation for the LEP populations will be conducted to inform clients on services available to their target populations, which include the LEP populations. The Ewing Senior Citizens will conduct public and individual interaction with agencies and the ridership directly to determine LEP needs. The Ewing Senior Citizens will ensure outreach communications are in languages that meet LEP thresholds and that interpreters are available for presentations. The Ewing Senior Citizens will advertise in newspapers that are widely read by the LEP organizations that we are trying to reach and work with nonprofits of a given LEP group.

Training Ewing Township Senior Citizens Staff

The Ewing Senior Citizens staff at all levels are aware of the need to reach out and provide information to LEP persons who rely on the transit services the Ewing Senior Citizens manages. In order to ensure that new staff members understand this need, supplemental training will need to be provided as part of the Ewing Senior Citizens employee orientation and annual training programs.

Particular attention will be given to the training of the staff people who receive requests. Additionally, staff who receive and respond to passenger requests for service changes, complaints, and other needs, will need to be trained to openly receive the information from LEP and low-literacy riders, and distribute the information to the appropriate section of the Ewing Senior Citizens or to the operator of the transit service. All the individuals in these groups will be made The Ewing Senior Citizens aware of the regularly updated Department of Social Services Interpreters List and services. The Ewing Senior Citizens staff and the operator of the Ewing Senior Citizens transit systems should be trained so that they may recognize the specific needs of each LEP community, and how to assist transit-dependent LEP or low-literacy persons in using the service and having their requests or complaints addressed.

New staff members, (as well as those presently in positions), will be or have been evaluated as to their ability to speak another language. Clients will be sent to those who can assist them. We also will network and seek assistance with bilingual people on our board and those who have positions in other Township departments. Staff will seek to become more fluent in languages that they presently speak.

Our free service to residences and legal signage are now printed in English and Spanish. All planning activities and notices that are advertised to the press are shared with news sources that serve a variety of The Ewing Senior Citizens service area LEP communities. Such publications include English language publications like the Trenton Times, Trentonian, Ewing Observer and Ewing Senior Monthly Newsletter, as well as the Spanish language publications, Reporte Hispano and the Trentonian El Latino Expresso.

The Ewing Senior Citizens planning program adheres to the Public Involvement Plan (PIP) as adopted by the Metropolitan Planning Organization (MPO), on September 22, 2014. MPO's PIP made the following commitment:

To better achieve its outreach efforts, MPO has developed five desired goals for its public involvement activities:

- 1. Educate the public about the transportation planning process and how they can get involved;*
- 2. Engage the public and all stakeholders through timely notice of meetings and events and increased opportunities to provide input;*
- 3. Enhance outreach tools and techniques to engage the many diverse regional constituencies;*
- 4. Ensure that public participation methods, mechanisms and opportunities are clearly defined and accessible; and*
- 5. Effectively involve the community, including those who have been traditionally underserved and underrepresented in the planning process.*

MPO's public involvement efforts strive to bring varied stakeholders into the process – in dynamic and significant ways – and enhance the level of collaboration and meaningful input.

While the Ewing Senior Citizens has the greatest capabilities to assist LEP persons who speak Spanish, there may be instances when activities will necessitate the provision of information and notices in languages other than English or Spanish. For example, if activities conducted affect a community in which there is a large population of LEP individuals who speak other Indo-European languages or Asian languages, The Ewing Senior Citizens may rely on other county resources for translation services.

Outcomes - Monitoring, Evaluating and Updating the Plan

The Ewing Senior Citizens will conduct periodic ridership, origin-destination and marketing surveys. It will be conducted in English and Spanish. The goal of the Ewing Senior Citizens is to acquire LEP and spoken language data so that accurate profiles of transit riders could be established and measures could be taken to reach out to the LEP population to plan accordingly.

To ensure this LEP will continue to be implemented successfully, The Ewing Senior Citizens has developed a committee to evaluate all information received from surveys, focus group meetings, outreach efforts, staff contact and trainings. The committee will review the plan annually for updates as needed, while also developing new concepts for implementation in the next plan. The committee will monitor the following statistics, at minimum:

- ◆ Statistics kept on LEP contacts
- ◆ Annual review of local Census data
- ◆ Ongoing collaboration with community partners
- ◆ Effectiveness and usage of written translated documents
- ◆ Assessment of the Civil Rights Act Title VI Program

Resources and Costs for LEP Outreach

The Ewing Senior Citizens will need to commit resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums. The costs associated with these efforts will have to be placed within The Ewing Senior Citizens' marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, The Ewing Senior Citizens concluded that there are currently extensive outreach materials for the languages spoken by persons with Limited English Proficiency in the service area. Based on all aspects of the Four Factor Analysis, the availability of interpreters is sufficient to meet the needs of the LEP population. The current translation of vital documents into Spanish and the availability of interpreters are sufficient to meet the needs of the Spanish-speaking LEP population. However, The Ewing Senior Citizens has established a near-term goal to include the translation of vital documents into French Creole and Polish, based on available resources and funding for such activities.

The Ewing Senior Citizens will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

Table Depicting Minority Representation on Decision-Making Bodies

Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the subrecipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

The sample below is provided for the purposes of guidance only.

“SUBRECIPIENT NAME” Board Minority Representation Analysis

TRIPS Advisory Board – Minority Representation

Body	Caucasian	Latino	African American	Asian	Native American	INSERT RACE	INSERT RACE
Population of the Service Area	% 72.2	% 4.4	% 25.8	% 2.6	% 0.7	%	
Subrecipient Advisory Board	%	%	%	%	%	%	
Senior Citizens Advisory Commission	% 78.6	% 0	% 21.4	% 0	% 0	%	
INSERT OTHER BOARD/COUNCIL	% 64.7	% 11.8	% 23.5	% 0	% 0	%	