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The County of Gloucester complies with all state and federal rules and regulations against discrimination in admission to, access to, or operations of its programs, services, and activities. In addition, County encourages participation of people with disabilities in its programs and activities and offers special services to all residents 60 years of age and older. Inquiries regarding compliance may be directed to the County's ADA Coordinator at (856) 384-6842/ New Jersey Relay Service 711.



**GLOUCESTER COUNTY
DIVISION OF TRANSPORTATION
SERVICES**

TITLE VI PROGRAM

2024

Gloucester County Division of Transportation Services
115 Budd Blvd
West Deptford, NJ 08097
Telephone: (856) 686-8355

<https://glocestercountynj.gov/706/Transportation>

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Terms & Definitions

Title VI Plan

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance.

Agency/Subrecipient/Awardee

Recipient of federal award through NJ Transit Local Programs Department. The federal grant awards include Section 5310, Section 5311 and/or Congestion Mitigation Air Quality (CMAQ).

Vital Document(s)

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. In relation to your Title VI Plan, the following documents are considered vital:

- Non-Discrimination Policy
- Complaint Policy
- Complaint Form

Limited English Proficiency (LEP)

For persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand.

LEP Language

For purposes of developing the Title VI Plan, those languages other than English determined via the Census Bureau website as Speaks English "Less than Very well".

Safe Harbor Provision

A "safe harbor," in the context of this guidance, means that the recipient has undertaken efforts to comply with respect to the needed translation of vital written materials. If a recipient conducts the four-factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the recipient provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance.

Safe Harbor Provision Threshold

After conducting research of languages spoken in a household via the Census website, the threshold to determine the Safe Harbor Provision is 1,000 or 5% of the total LEP population. If the language population is more than 1,000 or 5%, then vital documents should be translated into that language to be considered compliant.

Four-Factor Analysis

Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit

organizations. As a starting point, a recipient may conduct an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services).
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program.
4. The resources available and costs to the recipient.

Language Assistance Plan (LAP)

Document explaining how to provide services to individuals who are non-English speaking or have limited English proficiency.

Resources

FTA 4702.1B, Chapter III – re: Safe Harbor Threshold

[FTA Circular 4702.1B: Title 6 Requirements and Guidelines for Federal Transit Administration Recipients | FTA \(dot.gov\)](#)

US Census Bureau – for Limited English Proficiency (LEP) Data

[Census Bureau Data](#)

Recommended use of the following data tables (enter them using the advanced search toolbar)

- **C16001** – Language Spoken at Home for the Population 5 Years and Over
- **B16001** – Language Spoken at Home by Ability to Speak English for The Population 5 years and Over

Further recommended to use the browser, Microsoft Edge when running data report

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ATTACHMENT A

Title VI Non-Discrimination Policy

Gloucester County Division of Transportation operates its program and service 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 discrimination practice under Title VI may file a complaint in writing to Gloucester County Division of Transportation to file a complaint, or for more information on Gloucester County Division of Transportation obligations under Title VI write to: Gloucester County Division of Transportation at 115 Budd Blvd West Deptford, 08096 or visit gloucestercountynj.gov/transportation. Transportation services provided by this agency are in whole or part funded through federal funds received through NJ Transit and as an individual you also have the right to file your complaint to both Gloucester County Division of Transportation as well as the Federal Transit Administration. Complaints may also be filed with the Federal Transit Administration in writing and may be addressed to:

Title VI Program Coordinator
East Building, 5th Floor-TCR, U.S. Department of Transportation
Federal Transit Administration, Office of civil Rights
1200 New Jersey Avenue, SE, Washington, DC 20590

A copy of this policy is available at the following location

- Behind the seat of all federally funded vehicles
- In the lobby of: 115 Budd Blvd West Deptford NJ, 08096
- <https://gloucestercountynj.gov/706/Transportation>
- If information is needed in another language, contact Gloucester County 856-686-8355

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ATTACHMENT B

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 Gloucester County Division of Transportation (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Gloucester County Division of Transportation 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 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the 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 30 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

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El Condado de Gloucester cumple con todo Estado federal y reglamentos y no discrimina por edad, raza, credo, color, origen nacional, ascendencia, estado civil, orientación sexual o afectiva, la identidad de género o expresión, discapacidad, nacionalidad o sexo en la admisión para el acceso a, o las operaciones de sus programas, servicios, actividades o en sus prácticas de empleo. Además, Condado de Gloucester fomenta la participación de personas con discapacidad en sus programas y actividades y ofrece servicios especiales a todos los residentes del Condado de 60 años de edad y mayores. Preguntas respecto a la conformidad deben dirigirse a la oficina a través del Condado ADA Coordinador (856) 384-6842 / New Jersey Relay servicio 711



ATTACHMENT B

Título VI Procedimiento Compatible Con

Cualquier persona que cree que él o ella ha sido discriminado sobre la base de raza, color u origen nacional por la división del Condado de Gloucester en transporte (en adelante la "autoridad") puede presentar un título VI obediente al completar y enviar Título VI compatible con forma de la Agencia. La división de transporte del Condado de Gloucester investiga denuncias recibidas no más de 180 días después del presunto incidente. La autoridad procesará las denuncias que se completa.

Una vez recibida la queja, la autoridad lo revisaremos para determinar si nuestra oficina tiene jurisdicción. La queja recibirá una carta de reconocimiento le informa si la denuncia será investigada por nuestra oficina.

La autoridad tiene 60 días para investigar la denuncia. Si se necesita más información para resolver el caso, la autoridad puede comunicarse con el demandante. El demandante tiene 30 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por la organización querellante o no recibe la información adicional dentro de los 30 días, la autoridad administrativa puede cerrar el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir su caso.

Después el investigador revisa la queja, él/ella remitirá a uno de dos letras al demandante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado. Un LOF resume las denuncias y las entrevistas en relación con el incidente y explica si cualquier acción disciplinaria, formación adicional de funcionario o de otra acción ocurrirá. Si el demandante desea apelar la decisión, ella tiene 30 días después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de tránsito, en la oficina de FTA de los derechos civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

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ATTACHMENT C

Title VI Complaint Form

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

A. Complainant's information:

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

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

o 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:

E. Please describe the alleged discrimination. Explain what happened and whom you believe was responsible. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If additional space is needed, add a sheet of paper.

F. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? List all that apply.

Federal Agency _____

Federal Court _____

State Agency _____

State Court _____

Local Agency _____

If you have checked above, please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Address: _____

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

G. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signature _____ Date _____
Attachments: Yes _____ No _____

H. Submit form and any additional information to:

Gloucester County Division of Transportation Services
115 Budd Blvd
West Deptford, NJ 08096

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El Condado de Gloucester cumple con todas las reglas y regulaciones estatales y federales contra la discriminación en la admisión, el acceso o las operaciones de sus programas, servicios y actividades. Además, el Condado fomenta la participación de personas con discapacidades en sus programas y actividades y ofrece servicios especiales a todos los residentes de 60 años de edad y mayores. Las consultas sobre el cumplimiento pueden dirigirse al Coordinador de la ADA del Condado al (856) 384-6842 / Servicio de Relevos de Nueva Jersey 711.



ATTACHMENT C

Formulario de reclamación del Título VI

Nota: La siguiente información es necesaria para ayudar en el procesamiento de su queja.

A. Información del demandante:

Nombre: _____

Dirección: _____

Ciudad/Estado/Código Postal: _____

Número de teléfono (Inicio): _____

Número de teléfono (Obra): _____

Dirección de correo electrónico: _____

¿Requisitos de formato accesible? (Seleccione uno o más)
oImpresión en grande

oTDD

oAudio Tape

B. Persona discriminada (si alguien que no sea denunciante):

Nombre: _____

Dirección: _____

Ciudad/Estado/Código Postal: _____

Número de teléfono (Inicio): _____

Número de teléfono (Obra): _____

Dirección de correo electrónico: _____

Relación con la persona por la que se queja: _____

Por favor, explique por qué ha solicitado un tercero:

Confirme que ha obtenido el permiso de la parte agravada si está presentando una solicitud en nombre de un tercero.

oYes

eso

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

origen _____ Race _____ Color _____ National

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ATTACHMENT D

**Table of Transit Related Title VI
Investigations, Complaints, and Lawsuits**

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.

**Table 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 | | | | |
| 1. | | | | |
| 2. | | | | |
| Lawsuits | | | | |
| 1. | | | | |
| 2. | | | | |
| Complaints | | | | |
| 1. | | | | |
| 2. | | | | |

**As of June 5, 2024, no ongoing investigations, lawsuits, or
complaints.**

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ATTACHMENT E Public Participation Plan

Gloucester County Division of Transportation Services (DTS) 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

Meeting locations

Gloucester County DTS 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 GCDTS 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 and all fare changes, GCDTS conducts public meetings that utilize one-on-one interviews with customers. GCDTS 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. GCDTS 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. 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 GCDTS analyses along with all public feedback received. The public comments are presented at Local Citizens Transportation Advisory Committee meetings so that they are part of the decision-making process. They are also shared with County Administration and the Freeholder Liaison.

Website

GCDTS website provides round-the-clock information on the transit system, including fare structures, route schedules and maps. Any changes in service, such as weather anomalies, traffic re-routes, or holiday hours are made available on the site. GCDTS press releases and customer newsletters are published on the site. The site has Google Translation software for on demand translation to Spanish. RSS messages can be sent to customer phones for immediate service alerts when they sign-up for the service. Customers also may apply on line to become a member of the Local Citizens Transportation Advisory Committee (LCTAC) Customer Advocacy Group which reports directly to GCDTS Management staff. This council is representative of both minority and non-minority groups.

Community Events

GCDTS 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. GCDTS staffers man a display booth and provide information on public transit activities and review customer feedback.

Information Tables

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

Outreach to Community Groups

GCDTS meets with community groups and social service agencies to listen to community concerns to low-income and minority populations. GCDTS has associations with SHADES and VISCOP groups which assist LEP persons.

Has sub-recipient integrated into its established public participation and outreach processes procedures that ensure involvement and participation by minority and LEP populations?

- Pureland East/West Community Shuttle Collaborative: GCDTS participates in monthly collaborative meetings, contributes ideas to the newsletter and assists in the promotion of the route
- Public Hearings: Senior Services held in May and Transportation hearing in the Summer Months
- Transportation Public Hearing Seat Notices are placed in vehicles and distributed to municipalities in Spanish and English
- Representative from Transportation & Human Services speak at Community Events for county residents: GC Senior Citizen Health & Wellness Day, GC Disability Resource Fair, GC Mayor's Association
- Re-established County Human Services Transportation Committee (Formerly United We Ride) invited human services providers, municipal transportation coordinators, economic development specialists, education professionals, America's Job Center and NJ Transit/Access Link
- Staff participates on the Workforce Investment Board's Disabilities subcommittee where the focus is on job skills and training.
- DTS Staff when participating in site visits will request documentation of proof of training for Title VI & LEP Drivers/Staff

When Gloucester County Division of Transportation wants to advise the public of specific projects that will have a direct impact on riders, Gloucester County Division of Transportation staff will provide seat notices in both English and Spanish.

Outreach to Community Groups

Gloucester County Division of Transportation meets with community groups and social service agencies to listen to community concerns on the effects of fare changes to low-income and minority populations. Gloucester County Division of Transportation has associations with South Jersey Transit Authority, Sen-Han, St. John of God, Ability Solutions, Adult Center for Transition (ACT), Gloucester Arc, all of which assist LEP persons.

Jurisdictional Meetings

Gloucester County Division of Transportation conducts an extensive outreach program with jurisdictions throughout its service area. Over 8-10 meetings annually are conducted to gather meaningful feedback on current transit needs issues, offer information about the services Gloucester County Division of Transportation provides, and enhance relationships with our stakeholders.

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ATTACHMENT F

Language Assistance Plan

Gloucester County Division of Transportation
Language Assistance Plan (LAP) to Address Service to Individuals with Limited English Proficiency

The Gloucester County Division of Transportation is responsible for the management of the County's paratransit 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 currently include South Jersey Transportation Authority (SJTA) and Sen-Han. This Language Assistance Plan (LAP) applies to the Gloucester County Division of Transportation 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 Gloucester County Division of Transportation uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps Gloucester County Division of Transportation communicate effectively with persons with LEP or low-literacy. The Four Factor Analysis considers the following components:

- The number or portion of LEP persons eligible to be served or likely to be encountered by Gloucester County Division of Transportation.
- The frequency with which LEP persons come into contact with Gloucester County Division of Transportation.
- The nature and importance of Gloucester County Division of Transportation activities, programs and services to people's lives.
- 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 Gloucester County Division of Transportation.

Four Factor Analysis

Factor #1: Description of the Limited English Proficient Population(s) Served

The Gloucester County Division of Transportation system serves communities in all 24 Municipalities within the Gloucester County Transportation service area. The Gloucester County Division of Transportation paratransit service operates between various points in the Gloucester County with limited services adjacent counties Camden and Cumberland and portions of

Philadelphia and Delaware. For the purpose of this document, the study area includes all of the Gloucester Division of Transportation service area.

American Community Survey 5-Year Estimates from <see Census Bureau data and indicate year> reveal that at the county level, while there are numerous languages spoken at home, there are <indicate the # of

LEP languages identified via Census Bureau> languages spoken where more than 1,000 people speak English less than very well. The (#) languages are included in the following table.

Table 1: Languages at the County Level

Source: American Community Survey, (#)-Year Estimates, (year). 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”. This definition artificially inflates all of the LEP persons total, including raising the number of Chinese and Russian LEP persons above the

| Sample Spoken Languages | Number that speak English less than very well (estimated) | Percentage that speak English less than very well |
|-------------------------|--|---|
| Spanish | 497 | 7.5 |
| French Creole | None of these languages exceed 1000 persons that speak English less than very well | |
| Yiddish | None of these languages exceed 1000 persons that speak English less than very well | |
| | | |
| | | |
| | | |

1,000-person threshold.

*Other Asian Languages is not a specific language, but instead a group of languages with no detail regarding the number of LEP persons for each language included, so it does not require any specific consideration in relation to the Safe Harbor Provision.

Geographic Distribution of Total Population with Limited English Proficiency

At the time of the 2020 Decennial Census, Gloucester County Division of Transportation service area had a total population of 302,670, of whom 291,424 were individuals age 5 years and older (As per the 2022 American Community Survey (ACS) 1-Year estimates). Of this population, 89.6 percent speak only English, while the remaining 10.4 percent speak another language other than English. In Gloucester County Division of Transportation service area, 1.4 percent of the total population represent the LEP population (2022 ACS Household Language By Household Limited English Speaking Status); 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 2 percent.

Gloucester County Division of Transportation service area contains 69 census tracts, of which 26 contain LEP populations. These 26 tracts contained 1,588 LEP residents in 2022, or 100 percent of the county's LEP residents. The 26 census tracts containing LEP populations are located within the townships of Washington, Woolwich, Deptford, West Deptford, Monroe, Greenwich and Franklin. While also having populations in the boroughs of National Park and Glassboro and the City of Woodbury. The largest cluster fell within the census tracts of 5005,5004,5002.04 which all share borders.

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

Much like the State overall, the largest share of the households that speak another language other than English in Gloucester County Division of Transportation service area speaks Spanish as their primary language. Statewide, 17.1 percent or 600,667 households are Spanish speaking. Of the 600,667 Spanish speaking households in the state 145,117 are LEP or 24.2% of the total households of 600,667. In Gloucester County Division of Transportation service area, there are 111,781 households of the 111,781 household's 5.9 percent or 6,607 of households are Spanish speaking. Of the 6,607 Spanish speaking household's 7.5 percent or 497 represent LEP households.

With the exception of census tracts 5014.04 located Borough of Glassboro, which is the only census tract that contains a higher percentage of LEP households than the county average. There is only one census tract, tract 5014.04 with a concentration of LEP persons in the county (over 10 percent of the total households). The census tracts in the central part of Glassboro contains the highest concentration of LEP households in the Gloucester County Division of Transportation service area.

Limited English Proficient Population Concentrations and Transit Service

The concentrations of population with Limited English Proficiency are scattered throughout the county. This includes the townships of Franklin, Woolwich, Greenwich, Mantua, Harrison, Monroe and West Deptford. It also includes the boroughs of Westville, Woodbury, Paulsboro, Swedesboro and Glassboro. These areas are heavily served by Gloucester County Division of Transportation bus routes. At the heart of the largest cluster of high-LEP census tracts, the Gloucester County Division of Transportation Transit Center provides access to five Gloucester County Division of Transportation bus routes, the Gloucester County Transportation, Gloucester County Transportation service, and the commuter railroad. Money CDP is served by Gloucester County Division of Transportation bus routes, Gloucester County Division of Transportation bus

service, and Gloucester County Division of Transportation service. The Villages of Haverford and West Haverford are served by the Gloucester County Transportation.

Factor #2: Frequency of Use by the Limited English Proficient Populations

Individuals with limited English proficiency inquire about use and are affected by service that Gloucester County Division of Transportation provides on a daily basis. Operational services include fixed route service and ADA paratransit service. Individuals with limited English proficiency also come into contact with Gloucester County Division of Transportation by calling the customer service telephone line, visiting the facility, and using the website. A significant part of the development of the Gloucester County Division of Transportation Language Assistance Plan is the assessment of major points of contact, which include, but are not necessarily limited to, the following:

- ◆ Riding fixed route, paratransit and commuter buses
- ◆ Communication with customer service staff
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public meetings and events
- ◆ Paratransit reservation agents
- ◆ Local news advertising (print)
- ◆ Service-related posters at Gloucester County Division of Transportation facility 115 Budd Blvd. West Deptford, NJ 08096 bus stops

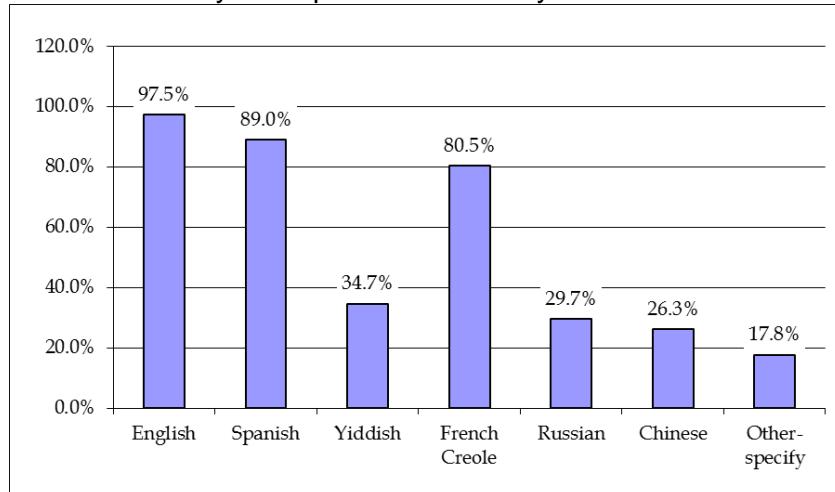
Employee Survey

In May 2024, to better understand the frequency with which LEP riders come into contact with Gloucester County Division of Transportation services, Gloucester County Division of Transportation Services conducted internal surveys of customer service staff, administrative staff, and fixed route, paratransit and commuter bus drivers. The survey tool was aimed at determining what language skills already exist among Gloucester County Division of Transportation employees and the vendor's employees and the number and nature of encounters with riders or other community members where language has been a barrier. Gloucester County distributed a language survey to its employees and to the employees of its vendor, South Jersey Transportation Authority (SJTA) and Sen-Han. A total of 21 surveys were completed. Of the 21 respondents 9 were SJTA, 8 from Sen-Han or 4 Gloucester County Transportation administrative staff or supervisors, 17 were SJTA/Sen-Han bus drivers. The results of the employee survey effort are described below. A copy of the survey instrument is provided in Appendix C-4.

Half of the survey respondents stated that they encounter non-English speaking passengers "often." Another 38 percent of respondents stated that they "sometimes" encounter non-English speakers. The remaining 12 percent of survey respondents "rarely" or "never" encounter non-English speaking passengers.

The languages most often encountered by Gloucester County Transportation employees and their vendor's employees are provided in the following chart (Exhibit 1). Employees were asked to list the frequency with which they come into contact with the most commonly spoken languages (according to American Community Survey). Most of the respondents English with Spanish coming in second.

Exhibit 1: Frequency of Encountering Different Languages by Employees of Gloucester County Division of Transportation and the Gloucester County Division of Transportation Services and South Jersey Transportation Authority and SEN-HAN



“Deaf” was the only response specified in the “Other” languages’ category. Approximately 98 percent of respondents who indicated “other” did not list the other language to which they were referring.

Approximately most of employee survey respondents indicated that they “very effectively” communicate with non-English speakers.

The most commonly requested information from non-English speakers was schedule and route information (80 percent).

Most interactions between the Gloucester County Division of Transportation Services and its vendor’s employees with passengers with Limited English Proficiency (LEP) are face-to-face (92 percent). Another 25 percent of respondents also interact with passengers over the phone.

Community Partner Survey

In May 2024, as part of this assessment, Gloucester County Division of Transportation also canvassed its six community partners to assess the extent to which they come into contact with LEP populations. Community partners are those who are either directly or indirectly affected by the plan, or recommendations of the plan. The community partners included the County Division of Social Services (DSS), the County Division for Senior Services, Rowan College of South Jersey/Adult Center for Transition, St. John of God and the Blind for the Visually Impaired Support Group. The Gloucester County Division of Transportation has regular communication with these agencies. Gloucester County Division of Transportation asked the partner agencies to respond to a brief list of questions to estimate the percent of clients they interact with who have Limited English Proficiency. A summary of responses is provided below. Individual answers from the partner agencies are provided in the following table.

- 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

| 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? |
|------------------------------------|---|--|--|---|
| County Division of Social Services | Yes | Spanish, Haitian Creole, Yiddish | DSS maintains a directory of multi-lingual staff and the languages spoken. Workers within a given unit are often identified and assigned according to language skills. Printed materials available in multiple languages. The DSS also maintains a list of interpreters that is available to the Gloucester County Division of Transportation Services and other county agencies. DSS maintains linkages with community-based partner organizations, which have a deeper knowledge of linguistic and cultural backgrounds of the LEP populations DSS serves. | Language is an ongoing challenge, but not a barrier. |
| County Division of Senior Services | Yes | Spanish, French Creole | Bilingual staff and working with family members. | No. |

Rider Input

In May, 2024 Gloucester County Division of Transportation conducted a passenger origin-destination survey. The survey asked passengers detailed questions about the Gloucester County Division of Transportation service. It also asked passengers to indicate their proficiency with the English language and what language they primarily speak at home.

According to the survey results, the majority of passengers for whom English was not their primary language spoke Spanish. In 2024, 50 percent (or 8 out of 16) of the survey respondents spoke Spanish as their primary language at home and spoke English not well or not at all. In 2024, Spanish remained the most common language other than English spoken by Gloucester County Division of Transportation passengers.

Factor #3: Importance of Gloucester County Division of Transportation Services to People's Lives

Access to the services provided by Gloucester County Division of Transportation is critical to the lives of many who depend on Gloucester County Division of Transportation for access to jobs and essential services. The 2024 passenger survey asked riders "what is the main purpose of your trip today?" Nearly 50 percent (49.4%) of LEP riders responding to the question indicated that they were riding for the shopping; 43% were going to medical appointments; 7% were riding for were riding to or from school.

Gloucester County Division of Transportation Services understands that if Limited English Proficiency or low-literacy is a barrier to using Gloucester County Transportation services, then the consequences for the individual could limit a person's access to obtain necessary medical care, employment or education. Vital information that can affect a person's access to Gloucester County Transportation services includes the following:

Types of Vital Information

- ◆ Route and schedule information
- ◆ Service Announcements
- ◆ Safety and security announcements
- ◆ Complaint and comment forms

Providing Language Assistance for Relevant Programs, Activities and Services

Gloucester County Division of Transportation Services utilizes the services of an in-house Gloucester County Department of Health & Human Services who is fluent in Spanish. Gloucester County Department of Health & Human Services staff provides rider information in Spanish and translates all informational flyers, notices, and other information for Gloucester County Division of Transportation Services. This information is posted at major bus stops and on all buses.

In August 2014, the Director of Social Services granted permission to the Gloucester County to utilize this list for language assistance to customers of the Gloucester County Division of Transportation (Appendix C-3). The list is organized by language spoken so that DSS and Gloucester County Division of Transportation employees may quickly reference speakers of a certain language when necessary, and can direct telephone calls and other forms of customer correspondence to county employees who can communicate with and assist residents.

For items in a word-processed format, Google Translate is provided for all languages on the Gloucester County Division of Transportation website:

<https://gloucestercountynj.gov/706/Transportation>

Informational presentations involving access to public transportation for the LEP populations have been conducted to inform agencies on services available to their target populations, which include the LEP populations. The Gloucester County Division of Transportation will conduct public and individual interaction with agencies and the ridership directly to determine LEP needs. The Gloucester County Division of Transportation will ensure outreach communications are in languages that meet LEP thresholds and that interpreters are available for presentations. The Gloucester County Division of Transportation 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 Gloucester County Staff

The Gloucester County Division of Transportation staff at all levels are aware of the need to reach out and provide information to LEP persons who rely on the transit services Gloucester County Division of Transportation manages. In order to ensure that new staff members understand this need, supplemental training will be provided as part of the Gloucester County Division of Transportation 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, shall be trained to openly receive the information from LEP and low-literacy riders, and distribute the information to the appropriate section of the Gloucester County Division of Transportation or to the operator of the transit service. All of the individuals in these groups will be made aware of the regularly updated Department of Social Services Interpreters List and services. Gloucester County Division of Transportation staff and the operator of the Gloucester County 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.

Providing Notice to Limited English Proficient Persons

As a matter of policy, all vital documents related to Gloucester County Division of Transportation services are printed in English and Spanish. Service changes brochures and flyers, which

advertise service adjustments and emergency information are also printed in both English and Spanish. On-board signage, advertising of Gloucester County Division of Transportation legal signage are also 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 Gloucester County Division of Transportation service area LEP communities. Such publications include English language publications like the South Jersey Times or Courier Post, the Yiddish language US1 Newspaper as well as the Spanish language publications, Americano Newspaper and Sentinel of Gloucester County.

The Gloucester County Division of Transportation planning program adheres to the Public Involvement Plan (PIP) as adopted by Delaware Valley River Planning Commission (DVRPC) 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 Gloucester County Division of Transportation 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, Gloucester County Division of Transportation may rely on other county resources for translation services.

Outcomes - Monitoring, Evaluating and Updating the Plan

The Gloucester County Division of Transportation conducts periodic ridership, origin-destination and marketing surveys. In 2024 a ridership survey was conducted on-board Gloucester County Division of Transportation buses in English and Spanish. The Gloucester County Division of Transportation worked 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 LAP will continue to be implemented successfully, Gloucester County Division of Transportation will develop 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

Factor #4: Resources and Costs for LEP Outreach

The Gloucester County Division of Transportation has committed 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. To date, the costs associated with these efforts fit within the Gloucester County Division of Transportation Services' marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, the Gloucester County Division of Transportation 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 Gloucester County Division of Transportation has established a near-term goal to include the translation of vital documents into French Creole and Yiddish, based on available resources and funding for such activities. The Gloucester County Division of Transportation will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

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The County of Gloucester complies with all state and federal rules and regulations against discrimination in admission to, access to, or operations of its programs, services, and activities. In addition, County encourages participation of people with disabilities in its programs and activities and offers special services to all residents 60 years of age and older. Inquiries regarding compliance may be directed to the County's ADA Coordinator at (856) 384-6842/ New Jersey Relay Service 711.



ATTACHMENT G

Table Depicting Minority Representation on Decision Making Bodies

| Body | Population of the Service Area | Subrecipient Advisory Board | Citizens Advisory Council | |
|---------------------|--------------------------------------|-----------------------------------|---------------------------------|--|
| Caucasian | 76% | 58 % | 100 % | |
| Latino | 10 % | 18 % | - % | |
| African American | 11 % | 18- % | - % | |
| Asian | 3 % | 6 % | - % | |
| Native American | 0.2 % | .1 % | - % | |
| Other | - % | - % | - % | |

