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LANGUAGE ASSISTANCE PLAN UNDER TITLE VI (2017)

Catholic Charities of the Archdiocese of Newark (“the Agency”) provides this Language Assistance Plan as part of the Agency’s obligations under the DOT’s Title VI regulations and the protections against discrimination afforded to the public by Title VI.

LANGUAGE ASSISTANCE PLAN TO ADDRESS SERVICE TO INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY

Purpose

The purpose of this Language Assistance Plan (hereinafter “plan”) is to meet Federal Transit Administration’s (FTA’s) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a sub recipient of FTA funds, the Agency pledges to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The Agency’s plan consists of the following:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating the plan

A. LEP Needs Assessment – the Four-Factor Analysis

Factor 1. The number or proportion of LEP persons in our service area who may be served or are likely to encounter a transit program, activity, or service.

The Agency assessed the 2014 US Census Data about LEP persons to determine the number or proportion of LEP persons who might use or want to use the Agency's transit services:

According to data provided by the 2013 American Community Survey 2009-2013 Five-Year¹ estimate:

- 1) The total number of LEP persons in the Agency's service area of Newark is 2,489,641.
- 2) The total eligible population in the Agency's service area is 8,294,499.
- 3) The proportion of LEP persons to the total eligible service population is 30%.

Factor 2. The frequency with which LEP persons come in contact with Agency transit programs.

Drivers report that LEP persons who speak primarily Spanish frequently use the Agency's transit services. The majority of LEP persons are Spanish and the most frequent destination, other than clients' homes, is the Agency's behavioral health site located at 58 Freeman Street, Newark, New Jersey.

LEP individuals inquire about use and are affected by the transit services that the Agency provides on a daily basis. LEP individuals also come into contact with the Agency by calling the customer service phone line, visiting the Agency, and using the website. A significant part of the development of the Agency's Language Assistance Plan is the assessment of major points of contact which include: communication with customer service staff; printed outreach materials; website; public meetings and events; and local print news advertising.

The conclusions drawn from examining this information about LEP persons seeking transit services are completely anecdotal. There is no information available to show that the Agency is not serving the LEP community. Those wishing to use the service are being served. The Agency is not aware of LEP persons who do not make attempts to use the transit due to limited English proficiency.

To better understand the frequency with which LEP riders come into contact with the Agency's transit services, the Agency plans on conducting internal surveys of customer service staff, administrative staff, and drivers. The survey tool will be aimed at determining what language skills exist among Agency employees and the nature of encounters with riders or other community members where language has been a barrier.

Additionally, the Agency plans on gathering rider input. The Agency plans on conducting a passenger survey. The survey will ask passengers detailed questions about the Agency's transit services. It will also ask passengers to indicate their proficiency with the English language and what language they primarily speak at home.

¹ <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmmk>

Factor 3. The nature and importance of programs, activities, or services provided to the LEP population.

The Agency considers transit to be an important and essential service for many people living in the Agency's service area. Many LEP persons use the Agency's transit service to travel to Agency social service programs and Agency locations providing behavioral health services. The most common destination in Newark is 58 Freeman Street. Access to transit services provided by the Agency is critical to the lives of many who depend on the Agency for access to essential services.

The Agency understands that if LEP or low literacy is a barrier to using Agency transit services, then the consequences for the individual could limit a person's access to obtain necessary medical care or education. Vital information can affect a person's access to Agency transit services and includes the following: route and scheduled information; service announcements; safety and security announcements; and complaint and comment forms.

Factor 4. The resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

The Agency's current budget for marketing to or communicating with LEP persons in their language about transit services that are available to them is \$1,000.00. This may include funding for brochures, flyers, posters, newspaper ads, radio ads, website, etc.

The Agency also employs many individuals as transportation staff who are fluent in Spanish. The Agency also provides rider information in Spanish upon request. The Agency also maintains a list of employees who can interpret different languages. The Agency utilizes this list for language assistance for transit customers of the Agency.

B. Language Assistance Measures

Efforts will be made to meet with the Spanish community using an interpreter to provide information to LEP persons on the services provided by the Agency. There are several language assistance measures that are available to the Agency. These include translation of key documents in Spanish and any other language requested by a client. Also included is communications with LEP persons' groups about transit services. Meetings with LEP persons' groups will include a translator whenever possible.

C. Staff Training

To ensure effective implementation of this plan, the Agency's Transportation Department will schedule training for all relevant transportation employees on an annual basis to review:

- Agency Transportation Department's Language Assistance Plan
- Demographic data about local LEP population
- How to handle verbal requests for transit service in a foreign language
- Responsibility to notify the Agency's Transportation Director about any LEP transit rider's unmet needs

Agency 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 Agency manages. In order to ensure that new staff members understand this need, supplemental training will be provided as part of the Agency's Transportation Department's annual training programs.

Particular attention will be given to the training of staff 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 Agency or to the operator of the transit service.

D. Notice to LEP Persons about Available Language Assistance

The Agency plans to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Posting signs on Agency buses and vehicles
- Displaying informational posters at Agency sites
- Sending information to local organizations that work with LEP persons
- Posting website notices

As a matter of policy, all vital Agency documents are printed in English and Spanish. Brochures and flyers which advertise service adjustments and emergency information are also printed in both languages. All planning activities and notices that are advertised to the press are shared with news sources that serve a variety of Agency service area LEP communities.

E. Annual Monitoring, Evaluating and Updating Plan

The Agency will review this plan during its annual review with the Agency Transportation Director and a Language Assistance Plan Committee (to be developed) by:

- Assessing its effectiveness (e.g., comparing numbers of LEP persons served by year, number of requests for language assistance received during the year)
- Assessing the sufficiency of staff training and budget for language assistance
- Reviewing current sources for assistance to ensure continuing availability
- Reviewing any complaints from LEP persons or about their needs that were received during the past year

This plan will be reviewed by the Agency annually. Revisions of this plan will be approved by dated resolution of the Agency Board of Trustees.

To ensure this Language Assistance Plan (LAP) will continue to be implemented successfully, the Agency will develop an LAP Committee to evaluate all information 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, at a minimum, statistics kept on LEP contacts and local census data, as well as continually assess the effectiveness of written translated documents and the Agency's Civil Rights Act Title VI Program.

F. Dissemination of Plan

This Language Assistance Plan is available on the Agency's website at <http://www.ccannj.org/language-assistance-plan>

This plan is also available at no cost upon request by telephone, fax, and mail or in person.

If requested to be provided in another language and it is feasible to have it translated, information will be provided at no cost to the requester.

G. Contact Information

Questions or comments about this plan may be submitted to:

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