

TOWNSHIP OF CHERRY HILL TITLE VI PROGRAM



Senior Bus Program
820 Mercer Street
Cherry Hill, NJ 08002
www.cherryhill-nj.com

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Township Clerk
856-488-7892
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INTRODUCTION

This document was prepared by the Township of Cherry Hill and approved by the Mayor & Council to comply with the Title VI of the Civil Rights Act of 1964, including the new provisions detailed in the U.S. Department of Transportation FTA Circular 4702.1B, Title VI Requirement and Guidelines for Federal Transit Administration Recipients and its sub-recipients.

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Title VI Notice to the Public

Township of Cherry Hill Senior Bus Program

- Township of Cherry Hill's Senior Bus Program 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 Township of Cherry Hill within 180 days of the alleged discrimination.
- To file a complaint, or for more information on Township of Cherry Hill's Senior Bus Program obligations under Title VI write to: 820 Mercer Street Attention: Township Clerk, Cherry Hill, NJ 08002 or visit www.cherryhill-nj.com.
- You also may file a complaint directly with the Federal Transit Administration at: The Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact 856-488-7892.
- Si se necesita información en otro idioma, llame al 856-488-7892.
- 若需要其他語言的信息, 請聯絡 856-488-7892

Título VI Aviso al Público

El municipio de Cherry Hill Programa Autobús Principal

- El municipio de Programa autobús Superior de Cherry Hill opera sus programas y servicios, sin distinción de raza, 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 por escrito al municipio de Cherry Hill dentro de los 180 días de la supuesta discriminación.
- Para presentar una queja o para obtener más información sobre el municipio de las obligaciones del programa Autobús Superior de Cherry Hill en el Título VI escriba a: 820 Mercer Street Atención: Clerk Township, Cherry Hill, NJ 08002 o visite www.cherryhill-nj.com.
- También puede presentar una queja directamente con la Administración Federal de Transporte en: La Oficina de Derechos Civiles, Atención: Coordinador de Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- Si se necesita información en otro idioma, llame al 856-488-7892.

第六标题公众通知

樱桃山镇 老年公交计划

- 樱桃山镇的老年公交计划根据 1964 年民权法案第六标题及其修正案的规定，运营其项目和服务时不考虑种族、肤色或国籍。任何认为自己因第六标题下任何非法歧视行为而受到侵害的人，可在涉嫌歧视发生后 180 天内向樱桃山镇提交书面投诉。
- 要提交投诉，或了解更多关于樱桃山镇老年公交计划在第六标题下义务的信息，请写信至：新泽西州樱桃山镇默瑟街 820 号，收件人：镇书记，或访问 www.cherryhill-nj.com。
- 您也可以直接向联邦运输管理局提交投诉，地址为：民权办公室，收件人：第六标题项目协调员，华盛顿特区东南新泽西大道 1200 号，东楼 5 层-TCR，邮编 20590。
- 若需要其他语言的信息，请联络 856-488-7892。

List of Locations Where Title VI is Posted

The Township of Cherry Hill’s Senior Bus Program notice to the public is currently posted at the following locations:

Location Name	Address	City
Township of Cherry Hill Town Hall	820 Mercer Street	Cherry Hill, NJ
Township of Cherry Hill Vehicles (Busses)	Misc.	Cherry Hill, NJ
Township of Cherry Hill Website	www.cherryhill-nj.com	
Township of Cherry Hill Senior Newsletter	Misc.	
Township of Cherry Hill Community Center	820 Mercer Street	Cherry Hill, NJ
Township of Cherry Hill Department of Public Works	1 Perina Blvd.	Cherry Hill, NJ
Cherry Hill Public Library	1100 Kings Highway North	Cherry Hill, NJ

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 the Township of Cherry Hill (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The Township of Cherry Hill 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 90 days to investigate the complaint. Within 60 days of the receipt of the complaint, the Authority will notify the complainant of its findings, the proposed disposition of the matter, the avenues available for appeal, and the timeline to appeal if there is dissatisfaction with the Authority’s decision. The proposed remedy will include the actions necessary to correct and prevent future occurrences. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 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 10 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.

Si se necesita información en otro idioma, llame al 856-488-7892.

若需要其他語言的信息, 請聯絡 856-488-7892

Township of Cherry Hill's Senior Bus Program

Title VI Complaint Form

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

Complaint Form

Section I : Please write legibly	
Name:	
Address:	
City/State/Zip Code	
Telephone(Home):	Telephone(Cell):
E-Mail Address:	
Accessible Format	() Large Print
Requirements?	() Audio Tape
() TDD	() Other
Section II :	
Are you filing this complaint on your own behalf? () Yes () No	
If NO, please complete the following information on the person being discriminated against:	
Name:	
Address:	
City/State/Zip Code	
Telephone(Home):	Telephone(Work):
E-Mail Address:	
Relationship for the person to whom you are complaining:	
Please explain why you have filed for a third party:	
Please confirm that you have received permission of the aggrieved party if you are filing on behalf of a third party. () Yes () No	
Section III :	

<p>Which of the following best describes the reason you believe the discrimination took place? () Race () Color () National Origin () Other</p>
<p>On what date(s) did the alleged discrimination take place?</p> <p>Date: Date: Date: Date: Other:</p>
<p>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.</p>
<p>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? List all that apply.</p> <p>Federal Agency _____ Federal Court _____ State Agency _____ State Court _____ Local Agency _____</p>
<p>If you have checked above, please provide information about a contact person at the agency/court where the complaint was filed.</p>

<p>Name: _____ Title: _____ Address: _____ City/State/Zip Code: _____ Telephone Number (Home): _____ Telephone Number (Work): _____ Email Address: _____</p>
<p>Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.</p> <p>Signature _____ Date _____ Attachments: Yes _____ No _____</p>

Submit form and any additional information to:

Township of Cherry Hill
Attention: Township Clerk
820 Mercer Street
Cherry Hill, NJ 08002

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 por el municipio de Cherry Hill (en lo sucesivo, "la Autoridad") puede presentar una queja del Título VI completando y presentando la agencia de Formulario de Queja Título VI. El municipio de Cherry Hill investiga las quejas recibidas no más de 180 días después del supuesto incidente. La Autoridad procesará quejas que son completos.

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 90 días para investigar la queja. Dentro de los 60 días siguientes a la recepción de la queja, la Autoridad notificará al denunciante sus hallazgos, la disposición propuesta del asunto, las vías disponibles para apelar y el plazo para apelar si hay insatisfacción con la decisión de la Autoridad. El remedio propuesto incluirá las acciones necesarias para corregir y prevenir futuros incidentes. Si se necesita más información para resolver el caso, la Autoridad puede contactar al denunciante. El denunciante tiene 10 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 el denunciante o si no se recibe la información adicional dentro de los 10 días hábiles, la Autoridad puede cerrar administrativamente el caso. Un caso también puede cerrarse administrativamente si el denunciante ya no desea continuar con su caso. Después de que el investigador revisa la queja, él / ella emitirá una de las dos cartas al denunciante: 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 las alegaciones y las entrevistas sobre el presunto incidente, y explica si una acción disciplinaria, la formación adicional del funcionario, u otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene 30 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 el TLC Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

Formulario de Queja Título VI

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

Formulario de Queja

Complaint Form

Sección I: Favor escribir de manera legible	
Nombre:	
Dirección:	
Ciudad/ Estado/Código Postal	
Teléfono (Casa):	Teléfono (Celular):
Dirección De Correo Electrónico:	
Formato Accesible <input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de Audio
Requisitos? <input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:	
Está presentando esta queja en su propio nombre? <input type="checkbox"/> Si <input type="checkbox"/> No	
Si no, por favor complete la siguiente información sobre la persona que está siendo discriminado:	
Nombre:	
Dirección:	
Ciudad/ Estado/Código Postal	
Teléfono (Casa):	Teléfono (Celular):
Dirección De Correo Electrónico:	
Relación de la persona a la que usted se queja:	
Por favor, explique por qué usted ha presentado para un tercero:	

<p>Por favor, confirma que ha recibido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero. () Si () No</p>
<p>Sección III:</p>
<p>Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación? () Carrera () Color () Origen Nacional () Otro</p>
<p>En qué fecha (s) ocurrió la supuesta discriminación ocurrió? Fecha: Fecha: Fecha: Fecha: Otros:</p>
<p>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.</p>
<p>Ha presentado esta queja ante cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal? Listar todos los que aplican.</p> <p>Agencia Federal _____ Corte Federal _____ Agencia Estatal _____ Tribunal Estatal _____ Agencia Local _____</p>
<p>Si ha comprobado anteriormente, proporcione información acerca de una persona de contacto en la agencia / tribunal donde se presentó la denuncia.</p>

Nombre: _____
Título: _____
Dirección: _____
Ciudad (*): Estado (*): Código Postal: _____
Número de teléfono (Inicio): _____
Número de Teléfono (Trabajo): _____
Dirección De Correo Electrónico: _____
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: Yes _____ No _____

Envíe el formulario y cualquier información adicional a:

El municipio de Cherry Hill
Atención: El municipio de Clerk
820 Mercer Street
Cherry Hill, NJ 08002

第六章 投诉程序

任何人认为自己因种族、肤色或国籍而受到 Cherry Hill 镇 (以下简称“当局”) 的歧视, 可通过填写并提交机构的 Title VI 投诉表提出 Title VI 投诉。Cherry Hill 镇会对收到不超过 180 天的投诉进行调查。当局将处理完整的投诉。

投诉收到后, 当局将审查以确定我们办公室是否有管辖权。投诉人将收到一封确认函, 告知他/她投诉是否将由我们办公室调查。

当局有 90 天时间调查投诉。在收到投诉后的 60 天内, 当局将通知投诉人其调查结果、拟议的处理方式、可用的上诉途径以及对当局决定不满意的上诉时间表。拟议的补救措施将包括纠正和防止未来发生的必要行动。如果需要更多信息来解决案件, 当局可能会联系投诉人。投诉人自收到信函之日起有 10 个工作日向指派的调查员发送请求的信息。如果在 10 个工作日内调查员未被投诉人联系或未收到附加信息, 当局可行政关闭案件。如果投诉人不再希望继续其案件, 案件也可被行政关闭。

调查员审查投诉后, 将向投诉人发出两封信之一: 结案函或调查结果函 (LOF)。结案函总结指控并说明没有违反 Title VI, 案件将关闭。LOF 总结指控和关于涉嫌事件的访谈, 并解释是否会采取任何纪律行动、工作人员的额外培训或其他行动。如果投诉人希望对决定提出上诉, 他/她在收到信函或 LOF 后的 30 天内可以这样做。

个人也可直接向联邦运输管理局民事权利办公室提出投诉, 地址为: FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590。

如果需要其他语言的信息, 请拨打 856-488-7892。

櫻桃山鎮老年人巴士項目**第六章投訴表**

注意：以下信息有助于处理您的投诉。

投诉表

第一部分：請清晰填寫	
姓名：	
地址：	
城市/州/邮政编码	
電話（家庭）：	電話（手機）：
电子邮件地址：	
無障礙格式要求？ <input type="checkbox"/> 大字體 <input type="checkbox"/> 錄音帶 <input type="checkbox"/> 听障人士專用電話 <input type="checkbox"/> 其他	
第二部分：	
您是代表自己提交此投诉吗？ <input type="checkbox"/> 是 <input type="checkbox"/> 否	
如果否，請填写以下关于被歧视者的信息：	
姓名：	
地址：	
城市/州/邮政编码：	
電話（家庭）：	電話（工作）：
电子邮件地址：	
您與投訴人關係：	
請解釋為何您代表第三方提交投訴：	
如果您代表第三方提交投诉，請确认您已获得受害方的許可。 <input type="checkbox"/> 是 <input type="checkbox"/> 否	
第三部分：	
下列哪一項最能描述您認為歧視發生的原因？	

<p><input type="checkbox"/> 種族 <input type="checkbox"/> 肤色 <input type="checkbox"/> 國籍 <input type="checkbox"/> 其他</p>
<p>涉嫌歧視發生在哪一天?</p> <p>日期: 日期: 日期: 日期: 其他:</p>
<p>請描述涉嫌歧視的情況。解釋發生了什麼以及您認為誰應對此負責。描述所有涉案人員。請提供歧視您的人員（如已知）的姓名和聯絡方式，以及所有目擊者的姓名和聯絡資訊。如果需要，請另附一張紙。</p>
<p>您是否已向任何其他聯邦、州或地方機構，或任何聯邦或州法院提交過此投訴？請列出所有適用項目。</p> <p>聯邦機構 _____ 聯邦法院 _____ 國家機構 _____ 州法院 _____ 當地代理商 _____</p>
<p>如果您已勾選以上選項，請提供投訴機構/法院的聯絡人資訊。</p> <p>姓名: _____ 標題: _____</p>

地址: _____ 城市/州/郵遞區號: _____ 電話號碼 (住宅): _____ 工作電話號碼: _____ 電子郵件: _____
請在下方簽名。您可以附上任何您認為與您的投訴相關的書面資料或其他資訊。 簽名 _____ 日期 _____ 附件: 是 _____ 否 _____

將表格和任何其他資訊提交至:

Township of Cherry Hill
Attention: Township Clerk
820 Mercer Street
Cherry Hill, NJ 08002

Township of Cherry Hill's Senior Bus Program

List of Transit Related Title VI Investigations, Complaints and Lawsuits

The Township of Cherry Hill's Senior Bus Program has not been involved in any transportation – related Title VI investigations, lawsuits or complaints.

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				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Township of Cherry Hill's Senior Bus Program

Public Participation Plan

The Township of Cherry Hill 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.

The Township of Cherry Hill 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

The Township of Cherry Hill publishes notices, brochures and tables regarding The Township of Cherry Hill's 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
- Pamphlets, posters and brochures
- Spanish and Chinese translated materials and forms such as Title VI notice and application forms

Meeting Locations

The Township of Cherry Hill 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 township activities that will impact them, especially LEP and minority populations. 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. The Township's regularly scheduled Council Meetings are held on the 2nd and 4th Monday of every month. If a constituent does not reregister to speak, they can speak during the public participation portion of the meeting.

Website

The Township of Cherry Hill's website provides round-the-clock information on the bus program, route schedules and maps. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. The Township's 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 Township's Senior Citizens Advisory Board, which reports directly to the Township of Cherry Hill's Management staff. This board is representative of both minority and non-minority groups.

Community Events

The Township of Cherry Hill 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. Township staffers man a display booth and provide information on the Senior Bus Program and review customer feedback.

Information Tables

When the Township of Cherry Hill wants to advise the public of specific projects that will have a direct impact on riders, Township staff will conduct personal

interviews and transcribe oral comments or assist customers with computer surveys to receive customer input.

Outreach to Community Groups

The Township of Cherry Hill meets with community groups and social service agencies to listen to community concerns.

Township of Cherry Hill Senior Bus Program

Language Assistance Plan

OVERVIEW

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficiency (LEP) analysis as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. This analysis helps the Township of Cherry Hill to communicate effectively with persons with LEP or low literacy. The four-factor LEP analysis considers the following components:

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the Township of Cherry Hill Senior Bus Program.

Factor 2: The frequency with which LEP persons come into contact with the Township of Cherry Hill Senior Bus Program.

Factor 3: The nature and importance of the Township of Cherry Hill Senior Bus Program, activities, programs and services to people's lives.

Factor 4: The resources available to the recipient for LEP outreach and Township of Cherry Hill Senior Bus Program, as well as the costs associated with that outreach.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

Purpose of the Language Assistance Plan

The limited English Proficiency Plan has been developed to address the Township of Cherry Hill Senior Bus Program Services responsibilities as a sub-recipient of

federal financial assistance as they relate to the needs of individuals with limited language skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin. FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including LEP. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to assessing information about using the transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled, "Improving Access to Services for persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funding.

The Township of Cherry Hill Senior Bus Program has developed this plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the Township of Cherry Hill Senior Bus Program. This document is also consistent with 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.

Four Factor Analyses

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the Township of Cherry Hill Senior Bus Program.

The Township of Cherry Hill Senior Bus Program holds a unique position in regard to meeting Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the

agency's focus is primarily to transport Cherry Hill senior and residents 60 years of age and older and disable residents to community center or to non-emergency medical or shopping appointments. This service is provided to these seniors and/or disabled persons because they may be unable to drive, transit options are insufficient and or do not exist in their area. The Township of Cherry Hill Senior Bus Program does not offer transportation to the general public other than in situation involving coordinated plan with other entities. All passengers must be residents of the Township.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "Safe Harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that if a recipient provides written translations of vital documents for each eligible LEP language group that constitutes five (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encounters, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide notice in the primary language of the LEP language group of the right to receive competent oral translation of those written materials, free of cost. These Safe Harbor Provisions apply to the translations of written documents only. They do not affect requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI program.

Township of Cherry Hill obtained information from the U.S. Census Bureau’s American Fact Finder in the section “Language Spoken at Home for the Population 5 Years and older: 2023 ACS 5-Year Estimate Detailed Tables” and the United States “2020 Decennial Census”. Language information was obtained from “2023 American Community Survey 5-Year Estimate Detailed Tables”, in order to determine the population of LEP persons within the jurisdiction and the primary language spoken.

The US Census Bureau 2023 American Community Survey 5-year Estimates Detailed Table and the United States 2020 Decennial Census estimates that the Township of Cherry Hill had a total population of 74,553¹ of whom 71,152 were individuals age 5 years and older. Of this population, 76% speak only English, while the remaining 24% speak other languages, either in addition to or instead of English. In the Township of Cherry Hill, 10.1%² of the total population represents the LEP population, that is, English is not their primary language and they speak English “less than very well.”

LEP Population in the Township of Cherry Hill, Camden County NJ Service Area

Township of Cherry Hill Language Spoken	Estimate	Percentage
Total population 5 yrs+>	71,152	100%
Speak Only English	54,563	78.3%
Speak a language other than English	16,589	23.31%
Speak Spanish at Home	3,977	5.60%
Speak English “very well”	2,329	58.56%
Speak English “less than very well”	1,648	41.44%

¹ The total population data estimating a population of 74,553 people in Cherry Hill, NJ was derived from the United States 2020 Decennial Census:

(https://data.census.gov/profile/Cherry_Hill_township,_Camden_County,_New_Jersey?g=060XX00US3400712280)

² This percentage was calculated by adding all responses of those who notated they spoke English “less than very well” upon all language groups notated in the “2023: ACS 5-Year Estimates Detailed Table”

(<https://data.census.gov/table/ACS5Y2023.C16001?q=c16001&g=060XX00US3400712280>).

Speaks Chinese (incl. Mandarin, Cantonese)	2,588	3.64%
Speaks English “very well”	1,048	40.50%
Speaks English “less than very well”	1,540	59.50%

The above data demonstrates that the Spanish and Chinese Speaking LEP populations meet the 5% or 1,000 person thresholds for requiring written translation of vital documents.

Our Safe Harbor Provision study determined that the Spanish and Chinese speaking LEP populations represent either 5% of the total population or the 1,000 person threshold for requiring written translation of vital documents. However, since this number includes all persons 5 years of age and older and the proportion of residents 55 years of age and older that seek and are the recipients of our transportation services represent a significantly smaller proportion of the Township’s population, the number of LEP persons meeting our criteria would be significantly lower and may not reach the Safe Harbor threshold.

Factor 2: The frequency with which LEP Persons come into contact with the Township of Cherry Hill Senior Bus Program.

Historical Analysis of LEP persons served by the Township of Cherry Hill Senior Bus Program transported by our bus and non-emergency medical and shopping trips for 2024 showed that we did not encounter any passengers or participants with Limited English Proficiency.

Individuals with limited English proficiency may inquire about use and are affected by service that the Township of Cherry Hill Senior Bus Program provides on a daily basis. Operational services include by appointment only, transportation services to community centers, medical and shopping appointments for residents 55 years of age and older and/or disabled residents. Individuals with limited English proficiency also come into contact with the Township of Cherry Hill Senior Bus Program by calling the customer service telephone line, visiting the facility, and using the website. A significant part of the development of the Township of Cherry Hill Senior Bus Program’s language assistance plan is the assessment of major points of

contact, which include, but are not necessarily limited to, the following: (1) communication with customer service staff; (2) printed outreach materials; (3) website; and (4) local advertising. To better understand the frequency with which LEP riders come into contact with the Township of Cherry Hill Senior Bus Program and services, the Township of Cherry Hill Senior Bus Program conducted internal informal surveys of administrative staff and drivers. Township of Cherry Hill Senior Bus Program assessed the frequency their staff has or could come into contact with LEP persons over the past 21 years. The result of the report is that there were no individuals participating or wishing to participate in the program with Limited English Proficiency that we were unable to communicate with.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

The primary purpose of the Township of Cherry Hill Senior Bus Program is to provide appropriate and adequate transportation for seniors and disabled persons who live in the Township of Cherry Hill. The program provides vital transportation for seniors to and from their medical appointments, food shopping trips and other important community destinations.

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

The Township of Cherry Hill Senior Bus Program is committed to providing language assistance to LEP populations who need services to gain access to the transportation program.

Summary

The summary of the four-factor analysis is identified by the following:

- (1) No "true" LEP participants have been served in the past 21 years.
- (2) No participant was underserved by the Township of Cherry Hill Senior Bus Program due to language barriers.
- (3) The other languages spoken in Township of Cherry Hill that meet the Safe Harbor Provision are Spanish.

Language Assistance Implementation Plan

Methodologies: Identifying LEP Individuals

The evidence of the Four Factor Analysis, very few LEP individuals are referred to or participate in the Township of Cherry Hill Senior Bus Program. There are a few languages spoken in Cherry Hill Township; Spanish, Chinese and other Indo-European languages that meet the Safe Harbor threshold. There does not seem to be a barrier at this time with individuals applying for the program or for participants currently enrolled in the program. For the past 21 years the Township of Cherry Hill Senior Bus Program has not failed to provide services to individuals in the Township of Cherry Hill.

Providing Services

The Township of Cherry Hill Senior Bus Program currently does not have a need for professional translation services however if needed, the Township has access to translation services if the need arises.

The following documents are made available to the public in Spanish and Chinese.

Title VI Notice to the Public

Title VI Complaint Procedure

Title VI complain Form

Communicating Availability of Language Assistance

The Township of Cherry Hill Senior Bus Program provides notice to LEP persons of the availability of language assistance through posting of our services at our facility, on our website, in our newsletters, through our Community Development office and community centers and through public meeting. Individuals seeking to become participants in the Township of Cherry Hill Senior Bus Program may call the customer service telephone number or visit the facility and apply and reserve a ride with the transportation coordinator/staff. The Township has access to translation services if the need arises.

Monitoring

The Township of Cherry Hill Senior Bus Program evaluates itself on the feedback from the participants in the program. The Administrators frequently meets with staff for any potential issues or problems. The transportation staff evaluates the program annually to find out areas it can improve upon. The Title VI plan will be evaluated annually and will be updated every three years.

Elements of evaluation may include:

- (1) Signs to be posted in the entry areas regarding the availability of services that are free of charge.
- (2) Website, documents, and brochures are offered or printed in the alternative language and includes a statement that, language services are available and free of charge.
- (3) Staff also informs LEP persons that language assistance is available and free of charge.

Employee Training

Most Township of Cherry Hill employees, staff, and management staff are unlikely to come into contact with LEP persons. County employees with an increased potential for interaction with LEP persons include bus operators, public health clinic workers, dispatchers, customer service personnel, and Sheriff's/Corrections Officers.

Training on Township of Cherry Hill's responsibility to serve LEP persons is implemented by the following means:

- Orientation and initial training for new employees, and ongoing training, will include information on serving LEP persons, with retraining for bus personnel at least one time per year.
- The Training Coordinator for the Township of Cherry Hill will conduct research on and implement training resources (videos, handouts, presentations, etc.) described in the DOT guidance on LEP implementation.

- Dispatchers, street supervisors, customer service personnel, receptionists, and management staff will take part in ongoing training, with at least one training session per year on the topic of serving LEP persons.
- An agenda will be provided on the day/date of the training
- Sign-in sheets will be kept to keep record of the participants of the training
- Certificates of completion of the training will be created and handed out to staff completing the training
- Refresher trainings will be conducted every [insert time frame, i.e. every six (6) months, annually, etc.]
- A log of all staff trainings will be kept on file.

Types of training provided:

- Familiarize staff with information on the Title VI Policy and LEP responsibilities.
- Provide description of language assistance services offered to the public.
- How to document language assistance requests.
- How to handle a potential Title VI/LEP complaint.

LEP and Public Participation Implementation Activities

Guidance:

It should be noted that a running log of any LEP outreach activities will be kept on file along with proof of which should include:

- Copy of outreach activity (ex. service cancellation notice)
- Proof of (translation of notice)

Table Depicting Minority Representation on Decision-Making Bodies

The Township of Cherry Hill does not have a decision-making body. All decisions are reviewed and approved by Ari Messinger, Director of Operations.

Title VI Equity Analysis

The Township of Cherry Hill Senior Bus Program does not have transit related facilities.