

THE CEREBRAL PALSY LEAGUE  
TITLE VI PLAN  
2015



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## **STATEMENT OF POLICY**

The Cerebral Palsy League (CPL) is governed by its Board of Directors. The Cerebral Palsy League provides accessible transportation to the public with contracted services or individual participants the transportation is operated by CPL staff.

The Cerebral Palsy League is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible transportation services. The Cerebral Palsy League recognizes its responsibilities to the communities in which it operates and to the society it serves. It is The Cerebral Palsy League's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

Toward this end, it is Cerebral Palsy League's objective to:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. Promote the full and fair participation of all affected populations in transportation decision making;
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- E. Ensure meaningful access to programs and activities by persons with limited English proficiency.

The responsibility for carrying out The Cerebral Palsy League's commitment to this program has been delegated to The Cerebral Palsy League's Executive Director by the Board of Directors. The Executive Director is responsible for the day-to-day operations will receive and investigate Title VI complaints which come through the complaint procedure. However, all managers, supervisors and employees share in the responsibility for making The Cerebral Palsy League's Title VI Program a success.

# **NON- DISCRMINATION POLICY**

## **Notice to Beneficiaries**

The Cerebral Palsy League, Inc. is committed to ensuring that no person is excluded from, or denied the benefits of, our services on the basis of race, creed, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin, may file a complaint in writing to The Cerebral Palsy League, Inc. To file a complaint, or for more information under The Cerebral Palsy League's obligations under Title VI write to Transportation Services at 61 Myrtle Street, Cranford, NJ or visit our website at [www.theclinc.org](http://www.theclinc.org). 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 under Title VI by writing to Title VI Program Coordinator, East Building 5<sup>th</sup> Floor- TCR, US Department of Transportation, Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Ave, SE, Washington, DC 20590. A complaint must be filed within 180 days of the alleged discrimination.

Our Title VI Notice to Beneficiaries will be posted on our website ([www.theclinc.org](http://www.theclinc.org)) under the Title VI Plan tab, the lobby of our agency as well as all Transit vehicles.

## **Política de no discriminación**

### **Aviso a los beneficiarios**

La parálisis cerebral League, Inc. se compromete a garantizar que ninguna persona sea excluida de, o negado los beneficios de, nuestros servicios sobre la base de raza, credo, color, u origen nacional como protegidos por el Título VI de la Ley de Derechos Civiles de 1964, según enmendada. Cualquier persona que cree que tienen, de forma individual o como miembro de una clase específica de personas, han sido sometidos a la discriminación por motivos de raza, color u origen nacional, puede presentar una queja por escrito a la Parálisis Cerebral Liga, Inc . Para presentar una queja o para obtener más información en virtud de las obligaciones de la parálisis cerebral de la Liga bajo el Título VI de escritura a los servicios de transporte a los 61 Myrtle Street, Cranford, Nueva Jersey o visite nuestro sitio web en [www.theclinc.org](http://www.theclinc.org). Servicios de transporte de esta agencia son total o parcialmente financiado a través de fondos federales recibidos a través de NJ Transit y como persona también tiene el derecho de presentar su queja en virtud del Título VI por escrito al Coordinador del Programa del Título VI, East Building quinto Floor- TCR, Departamento de Transporte de EE.UU., la Administración Federal de Tránsito, Oficina de Derechos Civiles, 1200 New Jersey Ave, SE, Washington, DC 20590. Una queja debe presentarse dentro de los 180 días de la supuesta discriminación.

Nuestra Título VI Aviso a los beneficiarios será publicada en nuestra página web ([www.theclinc.org](http://www.theclinc.org)) bajo la pestaña Plan de Título VI, el vestíbulo de nuestra agencia, así como todos los vehículos de tránsito.

## COMPLAINT PROCEDURES

Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with THE CEREBRAL PALSY LEAGUE, INC. within 180 days from the date of the alleged discrimination.

Complaints may be filed with THE CEREBRAL PALSY LEAGUE, INC., and NJ Transit or with the U.S. Department of Transportation.

### Filing a Complaint with THE CEREBRAL PALSY LEAGUE, INC.

- In Person: Complaints may be filed with THE CEREBRAL PALSY LEAGUE, INC. in person at 61 Myrtle St. Cranford, NJ during 8:30-4:00.
- By Mail: Complaints may be filed with THE CEREBRAL PALSY LEAGUE, INC. in writing and may be addressed to:

THE CEREBRAL PALSY LEAGUE, INC.  
61 Myrtle St.  
Cranford, NJ 07016  
Attn: Human Resources

If information is needed in another language, contact (908) 709-1800  
Si se necesita información en otro idioma, el contacto (908) 709-1800

### Filing a Complaint with the U.S. Department of Transportation

A complainant may file a Title VI complaint with the U.S. Department of Transportation by contacting the Department at:

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1760 Market Street, Suite 500  
Philadelphia, PA 19103-4124

### What Happens to My Title VI Complaint filed with THE CEREBRAL PALSY LEAGUE, INC.?

Once a complaint is received, it will be investigated. In instances where additional information is needed, the complainant will be contacted in writing. Failure of the complainant to provide the requested information within 10 days may result in the administrative closure of the complaint or a delay in complaint resolution.

Based upon receipt of all the information required, the Executive Management will investigate a Title VI complaint within 90 days of receipt. The Executive Director will prepare a draft written response and will make the final determination and approve the final response to the complainant, including notifying the complainant of his/her right to file a complaint externally.

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.

## PROCEDIMIENTOS DE QUEJAS

Cualquier persona que cree que él o ella ha sido objeto de discriminación bajo el Título VI sobre la base de raza, color u origen nacional, puede presentar una queja del Título VI con LA PARÁLISIS CEREBRAL DE LA LIGA, INC. Dentro de los 180 días a partir de la fecha de la supuesta discriminación .

Las quejas pueden ser presentadas ante LA PARÁLISIS CEREBRAL DE LA LIGA, INC., Y NJ Transit o con el Departamento de Transporte de Estados Unidos.

La presentación de una queja ante la PARÁLISIS CEREBRAL DE LA LIGA, INC.

- En persona: Las quejas pueden ser presentadas ante LA PARÁLISIS CEREBRAL DE LA LIGA, INC en persona en 61 Myrtle St Cranford, Nueva Jersey durante 8: 30-4: 00.
- Por correo: Las quejas pueden ser presentadas ante LA PARÁLISIS CEREBRAL DE LA LIGA, INC por escrito y pueden dirigirse a.:

LA PARÁLISIS CEREBRAL DE LA LIGA, INC.

61 Myrtle St.

Cranford, NJ 07016

A la atención de: Recursos Humanos

Si se necesita información en otro idioma, el contacto (908) 709-1800

Cómo presentar una queja con el Departamento de Transporte de EE.UU.

Un demandante puede presentar una queja del Título VI con el Departamento de Transporte de Estados Unidos en contacto con el Departamento en:

Departamento de Transporte de EE.UU.

Oficina de Derechos Civiles 1760 Market Street, Suite 500 Administración Federal de Tránsito Philadelphia, PA 19103-4124

¿Qué pasa con mi queja presentada ante el Título VI LA PARÁLISIS CEREBRAL DE LA LIGA, INC.?

Una vez que se recibe una queja, será investigado. En los casos donde se necesita información adicional, se estableció contacto con el denunciante por escrito. El incumplimiento de la demandante para proporcionar la información solicitada dentro de 10 días puede resultar en el cierre administrativo de la queja o un retraso en la resolución de quejas.

En base a la recepción de toda la información requerida, la Dirección Ejecutiva investigará una queja del Título VI dentro de los 90 días de recibo. El Director Ejecutivo preparará un proyecto de respuesta escrita y hará la determinación final y aprobar la respuesta final a la denunciante, incluyendo la notificación al demandante de su / su derecho a presentar una queja en el exterior. 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 había una violación del Título VI y que el caso se cerrará. Un LOF resume las alegaciones y las entrevistas sobre la presunta incidente, y explica si alguna acción disciplinaria, 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.

## TITLE VI- COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall on the basis of race, color, or national origin, be excluded from participation in, be denied the benefit of, or otherwise be submitted to discrimination in any program, service, or activity receiving federal financial assistance."

This form may be used to file a complaint with The Cerebral Palsy League, Inc. (CPL) for alleged violations of Title VI of the Civil Rights Act of 1964. **If you need assistance completing this form due to a physical impairment or other reasons, please contact us by phone at (908) 709-1800 ext 128 or via FAX (908) 709-0130.**

**Only the complainant or the complainant's designated representative should complete this form.**

NAME			DATE	
STREET ADDRESS				
CITY			STATE	ZIP CODE
HOME PHONE #	WORK PHONE #	FAX #	EMAIL	

**Individual(s) discriminated against, if different from above (use additional page(s) if necessary):**

NAME			DATE	
STREET ADDRESS				
CITY			STATE	ZIP CODE
HOME PHONE #	WORK PHONE #	FAX #	EMAIL	

PLEASE EXPLAIN YOUR RELATIONSHIP TO THE INDIVIDUAL(S) INDICATED ABOVE

**Please explain why you have filed for a third party:**

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**Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party**       Yes     No

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

Race     Color     National Origin     Disability

**Other:** \_\_\_\_\_

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

**Date:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Please as clearly as possible what happened? Provide the name(s) of witnesses and others involved in the alleged discrimination. (Attach additional sheets if necessary and provide a copy of written material pertaining to your case.)**

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**SIGNATURE**

**DATE**

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): \_\_\_\_\_

**Note:** *The laws enforced by this department prohibit retaliation or intimidation against anyone because that individual has either taken action or participated in action to secure rights protected by these laws. If you experience retaliation or intimidation separate from the discrimination alleged in this complaint or if you have questions regarding the completion of this form, please contact:*

*The Cerebral Palsy League, Inc.  
61 Myrtle St.  
Cranford, NJ  
Email: sgribbin@theclinc.org*

## TÍTULO VI-FORMA DE QUEJA

Título VI de la Ley de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos será sobre la base de raza, color u origen nacional, ser excluida de participar en, ser negado el beneficio de, o de otra manera se presentará a la discriminación en cualquier programa, servicio o actividad que reciba asistencia financiera federal".

Este formulario puede ser utilizado para presentar una queja ante la parálisis cerebral League, Inc. (CPL) por presuntas violaciones del Título VI de la Ley de Derechos Civiles de 1964. Si necesita ayuda para completar este formulario debido a un impedimento físico o por otras razones, póngase en contacto con nosotros por teléfono en (908) 709-1800 ext 128 o vía fax (908) 709-0130.

**Sólo el reclamante o el representante designado por el demandante debe completar este formulario.**

NOMBRE			FECHA
DIRECCIÓN			
CIUDAD		ESTADO	CÓDIGO POSTAL
TELEFONO DE CASA #	TELÉFONO DE TRABAJO #	FAX #	Correo electrónico

**Persona (s) discriminado, si es diferente del anterior (utilización página adicional (s) si es necesario):**

NOMBRE			FECHA
DIRECCIÓN			
CIUDAD		ESTADO	CÓDIGO POSTAL
TELEFONO DE CASA #	TELÉFONO DE TRABAJO #	FAX #	Correo electrónico

POR FAVOR EXPLIQUE SU RELACIÓN CON LA PERSONA (S) INDICA ARRIBA

**Por favor, explique por qué tiene campo por un tercero:**

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**Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero**       Si       No

¿Cuál de las siguientes opciones describe mejor la razón por la que cree que la discriminación se llevó a cabo?

- Race color    Origen Nacional de    Discapacidad

Otros: \_\_\_\_\_

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

**Fecha:** \_\_\_\_\_

**Fecha:** \_\_\_\_\_

**Fecha:** \_\_\_\_\_



## LIST OF TRANSIT RELATED TITLE VI INVESTIGATION'S, COMPLAINTS & LAWSUITS

At this time THE CEREBRAL PALSY LEAGUE, INC does not have nor have we had any investigations, or complaints.

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

## **PUBLIC PARTICIPATION PLAN**

Established in 1947, The Cerebral Palsy League, Inc. is a 501(c)(3) non-profit organization dedicated to improving the quality of life for individuals with physical and developmental disabilities. Our program is licensed by the New Jersey Department of Human Services, Division of Developmental Disabilities.

Services and supports are provided through our Adult Day Habilitation Services program. Individuals are referred for supports and services through New Jersey Department of Human Services, Division of Developmental Disabilities. As such, our programs work in conjunction with other local agencies and services meeting the needs of our community in a variety of outreach opportunities.

The Cerebral Palsy League's programs are designed to meet the needs of the individual being referred who would benefit from adult day program services. Our programs utilize community based and onsite instruction and supports. The individual referred receives supports including adult daily living skills training, work training, community volunteering, transportation and recreation opportunities. The goal of the program is to provide functional skills necessary for successful integration into the least restrictive environment for a better quality of life. The program provides transportation with 8-10 wheelchair accessible NJ Transit vehicles to and from program. Our programs also utilize these vehicles to incorporate real life experiences through daily community integration. Our programs enrollment demographics mirror the population of our community. The programmed activities for the approximately 100 participants involved in our Adult Day Health program are similar to those of non-disabled adults. Participants are encouraged to progress to the next level of program choices depending on their personal preferences. The Cerebral Palsy League maintains a system to gather annual stakeholder input regarding agency services. We are actively involved in public relations and outreach activities in order to create opportunities for public engagement. The information is used to strategically align our program options to meet the needs of our community.

### **Purposes of this Plan**

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

THE CEREBRAL PALSY LEAGUE 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 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 CEREBRAL PALSY LEAGUE employs several means to communicate to the general public regarding the activities it performs including LEP (Limited-English Proficient) and minority populations. Vital documents are translated into the required language. Documents can be obtained by contacting the Program Director. 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 CEREBRAL PALSY LEAGUE publishes notices, 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 but are not limited to:

- Customer Notification via memo, email.
- Signs Posted at main Office (61 Myrtle St. Cranford, NJ)
- Website links and articles
- Radio, television, newspaper ads and in publications that serve LEP populations

## **Summary of Outreach Efforts**

The following is a summary of outreach efforts conducted by THE CEREBRAL PALSY LEAGUE as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

THE CEREBRAL PALSY LEAGUE is a member of the Cranford Chamber of Commerce, and NJ Council on Special Transportation (NJ COST) we also serve on the board of Alliance for the Betterment of Citizens with Disabilities (ABCD).

## **Public Meeting Forums**

THE CEREBRAL PALSY LEAGUE's Board Meetings are not open to the public.

THE CEREBRAL PALSY LEAGUE conducts public meetings that utilize one-on-one interviews with our customers. THE CEREBRAL PALSY LEAGUE staff will prepare proposals in sufficient detail and make available prior to the meeting for interested individuals. Since each customer can be affected differently than another customer, obtaining comments this way allows for an individualized response to an individual need. THE CEREBRAL PALSY LEAGUE staff will conduct personal interviews and transcribe oral comments if written comments are not possible. An interpreter is available in order to reach individuals and their families with Limited English proficiency. Meetings will have sign-up sheets available and if no one is in attendance, staff will wait for 10 minutes and then announce the reason for the meeting, a statement that no one is in attendance and close the meeting. Customers are also able to leave audio messages on an advertised phone number prior to the advertised deadline for public feedback and the comments are transcribed for THE CEREBRAL PALSY LEAGUE's analysis along with all public feedback received. The public comments are presented at Board Meetings so that they are part of the decision making process.

Meetings will be reported to the board by The Executive Director if necessary. We have convenient access to transit and are centrally located so that anyone in our service area can attend meetings and receive information about any of THE CEREBRAL PALSY LEAGUE activities that will impact them, including LEP and minority populations. THE CEREBRAL PALSY LEAGUE will provide Transportation to our participants for scheduled meetings. 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. THE CEREBRAL PALSY LEAGUE does not rely on any counties or cities for funding of our transportation services.

**Website**

THE CEREBRAL PALSY LEAGUE’s website provides information on the transit system and any meetings that will be scheduled for the public’s input. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. THE CEREBRAL PALSY LEAGUE press releases and customer newsletters are published on the site. The site has Google Translation software for on demand translation to Spanish. Honeywell messages can be sent to customer phones for immediate service alerts when they sign-up for the service.

**Outreach to Community Groups**

THE CEREBRAL PALSY LEAGUE 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.

# **THE CEREBRAL PALSY LEAGUE'S LANGUAGE ASSISTANCE PLAN**

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

The Cerebral Palsy League transports individuals with disabilities from their residence to Day Habilitation Program, therapy services and back to their residence.

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

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

The following sections describe the application and results of the four factor analysis for The Cerebral Palsy League.

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

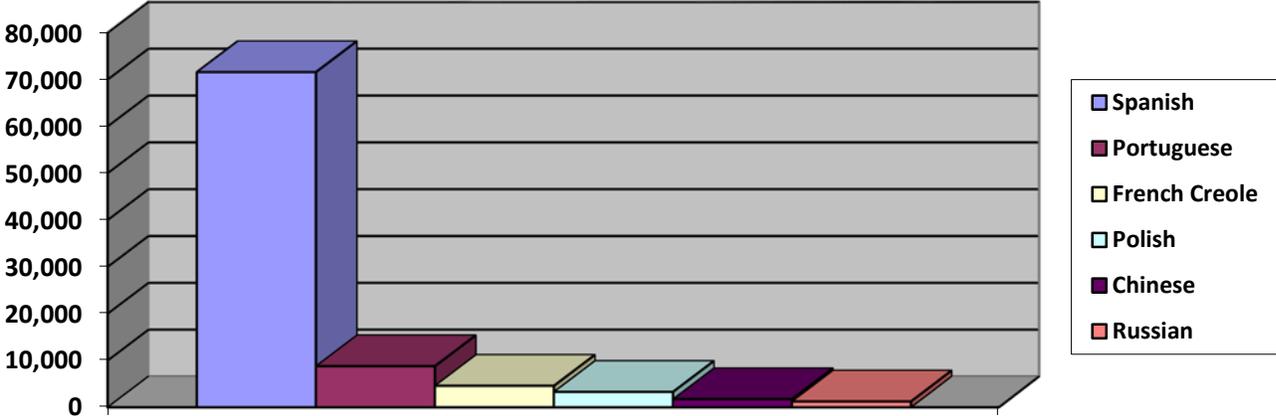
The Cerebral Palsy League’s transportation serves all 21 municipalities Union County.

Source: American Community Survey, 5-Year Estimates, 2012. 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 the LEP person’s entire total, including raising the number of Chinese and Russian LEP persons above the 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.

Table 1: Languages at the County Level

Language Spoken	Number that speak English less than very well (estimated)	Percentage that speak English less than very well
Spanish	71,584	54%
Portuguese	8,783	44%
French Creole	4,591	45%
Polish	3,291	49%
Chinese	1,733	43%
Russian	1,252	45%



## Geographic Distribution of Total Population with Limited English Proficiency

At the time of the 2012 American Community Survey, Union County had a total population of 536,499 people. Of this population, 54 percent speak only English, while the remaining 46 percent speak other languages, either in addition to or instead of English. Union County 46.7 percent of the total population represent the LEP population; that is, English is not their primary language and they speak English “not well” or “not at all.” This compares to the State LEP population of 7.1 percent.

Union County contains 38 census tracts, of which 7 contain LEP populations above the county average. These 38 tracts contained 93,103 LEP residents in 2012, or 17percent of the county’s LEP residents. The 38 census tracts containing LEP populations above the county average are located in three areas.

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

Much like the State overall, the largest share of the LEP population in Union County speaks Spanish as their primary language. Statewide, 56.3 percent of the LEP population ages five (5) and older are Spanish-speaking. In Union County, 58 percent of the LEP population ages five (5) and older speak Spanish as their primary language.

## **2. Frequency of Use by the Limited English Proficient Populations**

Individuals with limited English proficiency inquire about use and are affected by service that The Cerebral Palsy League provides on a daily basis. Operational services included daily transportation to and from our program. Individuals with limited English proficiency also come into contact with The Cerebral Palsy League by calling the program staff directly or visiting the facility, and using the website. A significant part of the development of The Cerebral Palsy League’s Language Assistance Plan is the assessment of major points of contact, which include, but are not necessarily limited to, the following:

- ◆ Riding fixed route,
- ◆ Communication with customer service staff
- ◆ Printed outreach materials
- ◆ Website

## **3. Nature and importance of service provided**

The Cerebral Palsy League transports individuals with disabilities from their residence to Day Habilitation Program, therapy services and back to their residence.

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 Department 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 Cerebral Palsy League and other county agencies.	Language is an ongoing challenge, but not a barrier.
County Office for the Aging	Yes	Spanish, French Creole	Bilingual staff and working with family members.	No.

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

The Cerebral Palsy League has experienced staff that is fluent in Spanish have agreed to serve as interpreters at a cost of \$8.50, per hour, we also use “Certified Languages International” phone service at a cost of \$1.30 per minute as needed on those occasions when a person with limited English proficiency contacts Cerebral Palsy League, Inc. THE CEREBRAL PALSY LEAGUE, INC. provides a number of publications in both English and Spanish.

##### **Training Cerebral Palsy League Staff**

The Cerebral Palsy League staff at all levels is aware of the need to reach out and provide information to LEP persons who rely on the transportation services The Cerebral Palsy League provides. In order to ensure that new staff members understand this need, supplemental training will be provided as part of The Cerebral Palsy League employee annual training programs.

##### **Providing Notice to Limited English Proficient Persons**

As a matter of policy, all vital documents related to The Cerebral Palsy League services are printed in English and Spanish. While The Cerebral Palsy League has the greatest capabilities to assist LEP persons who speak Spanish, there may be instances when activities will necessitate the provision of information and notices in languages other than English or Spanish. For example, if activities conducted affect a community in which there is a large population of LEP individuals who speak other Indo-European languages or Asian languages, The Cerebral Palsy League may rely on other county resources for translation services.

##### **Outcomes - Monitoring, Evaluating and Updating the Plan**

The Cerebral Palsy League conducts periodic ridership, origin-destination and marketing surveys. To ensure this LAP will continue to be implemented successfully, The Cerebral Palsy League 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

##### **Resources and Costs for LEP Outreach**

Following the Four Factor Analysis, The Cerebral Palsy League 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 Cerebral Palsy League 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 Cerebral Palsy League will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

**TABLE DEPICTING MINORITY REPRESENTATION ON DECISION-  
MAKING BODIES**

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian</b>	<b>Native American</b>
BOARD OF DIRECTORS	75%	%	10%	15%	%

Achieving diversity on The Cerebral Palsy League’s volunteer board is a challenging and essential task.

We continually recruit new board memberships by attending local community organizations that reflect the diversity in the community. We also regularly meet with our service recipients, parents/guardians to see if they have any interest in serving on our board.

Membership of Non-Elected Committees and Councils The Cerebral Palsy League does not have a non-elected transit related advisory council at this time.

## BOARD RESOLUTION

### *The Cerebral Palsy League* **Board Resolution** **September 29, 2015**

#### Title VI Plan

BE IT RESOLVED, The Cerebral Palsy League Board of Directors approves the Title VI plan to be submitted to New Jersey Transit by October 6, 2015. Title VI prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Motion: Michael Caultfield      Second: James Gay  
Yes 12      No 0

Board approved  
September 29, 2015