

THE CEREBRAL PALSY LEAGUE
TITLE VI PLAN
2022



Reviewed: September 2022

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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 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 The Cerebral Palsy League. To file a complaint, or for more information on The Cerebral Palsy League's obligations under Title VI write to: The Cerebral Palsy League Transportation Services, 61 Myrtle Street, Cranford, NJ 07016 or visit 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 to both The Cerebral Palsy League 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

Política de no discriminación

Aviso a los beneficiaries

La parálisis cerebral Liga 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 a la Parálisis Cerebral League. Para presentar una queja o para obtener más información sobre las obligaciones de la parálisis cerebral de la Liga en el Título VI de escritura a: Los servicios de transporte de Parálisis Cerebral de la Liga, 61 Myrtle Street, Cranford, NJ 07016 o visite 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 a ambos La parálisis cerebral de la Liga, así como la Administración Federal de Tránsito. Las quejas también se pueden presentar ante la Administración Federal de Tránsito por escrito y pueden ser dirigidas a: Coordinador del Programa Título VI, East Building, 5th Floor - TCR, Departamento de Transporte, la Administración Federal de Tránsito, Oficina de Derechos Civiles, 1200 Nueva Jersey Avenue Estados Unidos, SE, Washington, DC 20590 Street, Cranford, Nueva Jersey o visite nuestro sitio web en 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 escribiendo a NJ Transit Service al cliente - División del Título VI, One Penn Plaza Este, Newark, NJ 07105 o visita njtransit.com/diversity. Una queja debe presentarse dentro de los 180 días de la supuesta discriminación.

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.

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				
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				
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 field for a third party:

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

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.)

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 actions or participated in actions 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: LPorter@theclinc.org*

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

PUBLIC PARTICIPATION PLAN

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. 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:

- Customer Notification via memo, email.
- Signs Posted at main Office (61 Myrtle St. Cranford, NJ)
- Website links and articles

Meeting Locations

THE CEREBRAL PALSY LEAGUE 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 THE CEREBRAL PALSY LEAGUE 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, THE CEREBRAL PALSY LEAGUE conducts public meetings that utilize one-on-one interviews with customers. THE CEREBRAL PALSY LEAGUE 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. THE CEREBRAL PALSY LEAGUE staff will conduct personal interviews and transcribe oral comments if written comments are not possible. Meetings will have sign-up sheets available and if no one is in attendance, staff will wait for 10 minutes and then announce the reason for the meeting, a statement that no one is in attendance and close the meeting. Customers are also able to leave audio messages on an advertised phone number prior to the advertised deadline for public feedback and the comments are transcribed for THE CEREBRAL PALSY LEAGUE 's analysis along with all public feedback received. The public comments are presented at Board of Trustee Committee meetings so that they are part of the decision-making process.

Website

THE CEREBRAL PALSY LEAGUE's website provides information on the transit system. 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 has associations with NJ COST, Alliance for the Betterment of Citizens with Disabilities, Division of Developmental Disabilities, all of which assist LEP persons.

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.

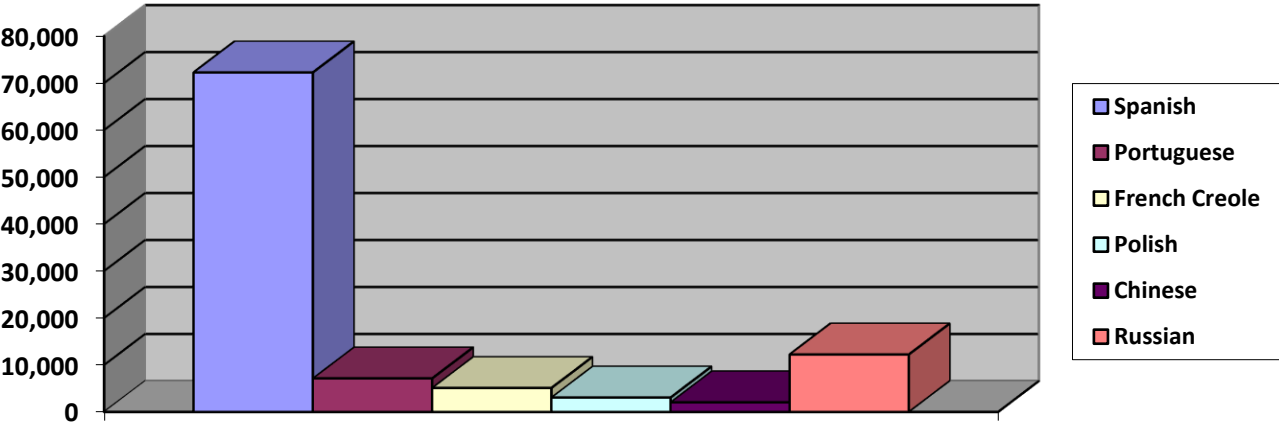
1. Description of the Limited English Proficient Population(s) Served

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

The residents who live in the households of Union County represent the rich diversity of cultures, languages, ethnicity, race, faith and origins that make New Jersey unique. Persons described as Limited English Proficient are defined as persons who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. CPL used the American Community Survey and Migration Policy Institute’s definition to define LEP persons as any individual who reported speaking English “not at all”, “not well” or “well.” Persons who speak only English or who report speaking English “very well” are considered proficient in English.

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	72,245	71%
Portuguese	7,123	7%
French Creole	5,087	5%
Polish	3,053	3%
Chinese	2,035	2%
Other Languages	12,210	12%



Geographic Distribution of Total Population with Limited English Proficiency

The ethnic composition of the population of Union County, NJ is 67.6% White residents, 32.3% Hispanic residents, 23.7% Black residents, 5.7% Asian residents, and 5% categorized as Other residents. Individuals who both speak Spanish at home and have limited English proficiency comprise 14.3% of the county's population or 74,507 individuals. The number of individuals that speak other Indo-European languages and have LEP is 22,374 or 4.3%. 14,084 or 2.7% of Union County residents are classified as Asian and Pacific Islander and Other Languages comprise of 8609 individuals or 1.6%. While the population of New Jersey has been declining, the population in Union County has been stable. The most common foreign language spoken in Union County, NJ is Spanish. It is noted that this data categorizes Limited English Proficiency as persons who speak English "less than very well".

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 \$15.00, 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**

Body	Caucasian	Latino	African American	Asian	Native American
BOARD OF DIRECTORS	75%	%	10%	15%	%

BOARD RESOLUTION