

**SECTION A**  
**Commitment to Civil Rights - Title VI**

SOUTH BRUNSWICK TOWNSHIP is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

Toward this end, it is SOUTH BRUNSWICK TOWNSHIP's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin
- 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
- Promote the full and fair participation of all affected populations in transportation decision making
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations and
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

The Township Manager, senior management, and all supervisors and employees share the responsibility for carrying out SOUTH BRUNSWICK TOWNSHIP's commitment to Title VI. The Township Manager's office is responsible for the day-to-day operation of the program, and receives and investigates Title VI complaints that come through the complaint procedures process as described in the next section.

si la información es necesaria en otro idioma por favor llame (732-329-4000)

अगर किसी अन्य भाषा में जानकारी की आवश्यकता है तो कृपया कॉल करें (732-329-4000)

**SECTION B**  
**Title VI 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 SOUTH BRUNSWICK TOWNSHIP within 180 days from the date of the alleged discrimination. Complaints may be filed with SOUTH BRUNSWICK TOWNSHIP, NJ Transit or with the U.S. Department of Transportation.

**Filing a Complaint with SOUTH BRUNSWICK TOWNSHIP**

- In Person: Complaints may be filed with SOUTH BRUNSWICK TOWNSHIP in person at the Municipal Building during regular business hours.
- By Mail: Complaints may be filed with SOUTH BRUNSWICK TOWNSHIP in writing and may be addressed to:

SOUTH BRUNSWICK TOWNSHIP  
540 Ridge Road  
P.O. Box 190  
Monmouth Junction, NJ 08852  
Attn: Township Manager

SOUTH BRUNSWICK TOWNSHIP will provide appropriate assistance to complainants who are limited in their ability to communicate in English. Complaints may also be filed with the Federal Transit Administration in writing and may be addressed to: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, DC 20590.

What Happens to My Title VI Complaint filed with SOUTH BRUNSWICK TOWNSHIP?

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 by a certain date may result in the administrative closure of the complaint or a delay in complaint resolution.

Based upon receipt of all the information required, the Township Manager will investigate a Title VI complaint within 90 days of receipt. The Township Manager 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.

The Township Manager's office will use its best efforts to respond to a Title VI complaint within 90 calendar days of its receipt of such complaint. Receipt of additional relevant information and/or simultaneous filing of complaints with SOUTH BRUNSWICK TOWNSHIP and an external entity may extend the timing of the complaint resolution.

For additional questions related to SOUTH BRUNSWICK TOWNSHIP'S non-discrimination policies and obligations, please write to:

SOUTH BRUNSWICK TOWNSHIP  
540 Ridge Road  
P.O. Box 190  
Monmouth Junction, NJ 08852  
Attn: Township Manager

**SECTION C**  
**Title VI Complaint Form**

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

A. Complainant's information:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State/Zip Code: \_\_\_\_\_  
Telephone Number (Home): \_\_\_\_\_  
Telephone Number (Work): \_\_\_\_\_  
Email Address: \_\_\_\_\_

Accessible Format Requirements? (Select One or More)

- Large Print
- TDD
- Audio Tape
- Other

B. Person discriminated against (if someone other than complainant):

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State/Zip Code: \_\_\_\_\_  
Telephone Number (Home): \_\_\_\_\_  
Telephone Number (Work): \_\_\_\_\_  
Email Address: \_\_\_\_\_

Relationship to the person for whom you are complaining: \_\_\_\_\_

Please explain why you have filed for a third party: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

- Yes
- No

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

\_\_\_\_\_ Race                      \_\_\_\_\_ Color                      \_\_\_\_\_ National Origin

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

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

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

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

\_\_\_\_\_

\_\_\_\_\_

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

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

Federal Agency \_\_\_\_\_  
Federal Court \_\_\_\_\_  
State Agency \_\_\_\_\_  
State Court \_\_\_\_\_  
Local Agency \_\_\_\_\_

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

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State/Zip Code: \_\_\_\_\_  
Telephone Number (Home): \_\_\_\_\_  
Telephone Number (Work): \_\_\_\_\_  
Email Address: \_\_\_\_\_

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

Signature \_\_\_\_\_ Date \_\_\_\_\_  
Attachments: Yes \_\_\_\_\_ No \_\_\_\_\_

H. Submit form and any additional information to:

South Brunswick Township  
540 Ridge Road  
P.O. Box 190  
Monmouth Junction, NJ 08852

Attn: Township Manager

**SECTION D**  
**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
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**SECTION E**  
**Public Participation Plan**

South Brunswick Township 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.

South Brunswick Township 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**

South Brunswick Township publishes notices, brochures and tables regarding South Brunswick Township’s proposals and programs, including how the public can obtain information and make comments, where meetings are to take place, rights of the public under Title VI 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

- Rack cards/"take ones" placed on the bus and racks throughout South Brunswick Township transit centers
- Transit Center posters and brochures
- Spanish translation services and translated materials including fare media signs, day and family pass rack cards, system map information, bus hailer kits, translation assistance cards, critical notifications and forms such as Title VI notice and application forms
- Radio, television or newspaper ads considering stations and publications that serve LEP and minority populations
- South Brunswick has provided copies of Title VI in all transportation vehicles, in both English and Spanish

### Meeting Locations

South Brunswick Township 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 South Brunswick Township 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, South Brunswick Township conducts public meetings that utilize one-on-one interviews with customers. South Brunswick Township 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. South Brunswick Township 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 South Brunswick Township'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

South Brunswick Township's website provides round-the-clock information on the transit system, including fare structures, route schedules and maps. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. South Brunswick Township 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 South Brunswick Township's

Customer Advocacy Group, which reports directly to the South Brunswick Township Management staff. This council is representative of both minority and non-minority groups.

### Community Events

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

### Information Tables

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

### Outreach to Community Groups

South Brunswick Township 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. South Brunswick Township has associations with Senior Advisory Council, all of which assist LEP persons.

### Jurisdictional Meetings

South Brunswick Township conducts an extensive outreach program with jurisdictions throughout its service area. Over 30 meetings annually are conducted to gather meaningful feedback on current transit needs issues, offer information about the services South Brunswick Township provides, and enhance relationships with our stakeholders.

## **SECTION F** **Language Assistance Plan**

### **South Brunswick Township Language Assistance Plan (LAP) to Address Service to Individuals with Limited English Proficiency**

The South Brunswick Township Transportation Department is responsible for the management of the South Brunswick local bus service. The County is the Primary Recipient of funds from the Federal Transit Administration (FTA) for the purpose of providing public transportation. Sub-

Recipients within the County receive their FTA funds for public transportation through the County.

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 Township of South Brunswick uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps South Brunswick Township 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 South Brunswick Township.
- 2) The frequency with which LEP persons come into contact with South Brunswick Township.
- 3) The nature and importance of South Brunswick Township 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 South Brunswick Township:

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

The South Brunswick Township system serves all communities in South Brunswick Township service area. The New Jersey Transit commuter bus service operates between various points in the South Brunswick service areas to the communities of other townships and cities in New Jersey, primarily along Rt. 27, connecting to New Jersey Transit rail service to other connecting buses. For the purpose of this document, the study area includes all of South Brunswick Township Transportation department service pickup area.

American Community Survey 5-Year Estimates from 2012 reveal that at the county level, while there are numerous languages spoken at home, there are zero (0) languages spoken where more than 1,000 people speak English less than very well.

### ***Geographic Distribution of Total Population with Limited English Proficiency***

At the time of the 2010 American Community Survey, South Brunswick Township had a total population of 43,417, of whom 40,948 were individuals age 5 years and older. Of this population, 99 percent speak only English, while the remaining 1 percent speak other languages,



either in addition to or instead of English. In South Brunswick, .0059 percent of the total population represents 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. The following table indicates the racial breakdown of South Brunswick as well as a grouping, by language group, of the percentage of the total population from each language group that speaks English “less than well.”

<b>Population</b>	<b>Total</b>	<b>Less than Well</b>
<b>Hispanic</b>	<b>1,146</b>	<b>.0001</b>
<b>Chinese</b>	<b>897</b>	<b>.0010</b>
<b>Indian</b>	<b>3,399</b>	<b>.0045</b>
<b>Korean</b>	<b>121</b>	<b>.0003</b>

The Township of South Brunswick also utilizes the services of Language Services Associates, which provides ready access to language translation services. Through Language Services, the Township can access over 3,000 professional telephone interpreters within seconds. The service is available 24 hours a day, 7 days a week, 365 days a year, offering translation and interpreter services in 200 languages.

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

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

- ◆ Riding fixed route, paratransit and commuter buses
- ◆ Communication with customer service staff
- ◆ Printed outreach materials

## **Employee Survey**

In March 2015, to better understand the frequency with which LEP riders come into contact with South Brunswick Senior Center, Senior Center data gathering conducted internal surveys of customer service staff, reservation agents, administrative staff, and fixed route, as well as the Senior Center bus drivers. The survey tool was aimed at determining what language skills already exist among Senior Center employees and the vendor’s employees and the number and nature of encounters with riders or other community members where language has been a barrier.

The data was compiled and showed 147 Hindi, 64 Telegru, 42 Chinese, and 15 Spanish speaking residents out of 17,877.

## **Employee Training**

Employees are encouraged to seek a reliable friend, family member or trusted adult who can act as an interpreter to facilitate communication with the LEP population. Employees are also encouraged to learn basic words and phrases of the different languages represented by the LEP riders. When this is not possible or fails to accomplish adequate communication, employees are instructed to make use of Language Services Associates, described above.

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

The Township of South Brunswick has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums. To date, the costs associated with these efforts fit within the South Brunswick Senior Center’s marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, the South Brunswick Senior Center 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 South Brunswick Senior Center has established a near-term goal to include the translation of vital documents into Hindi, Telegru, Chinese and Spanish, based on available resources and funding for such activities. The South Brunswick Senior Center will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

## **SECTION G**

### **Table Depicting Minority Representation on Decision-Making Bodies**

Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the subrecipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

#### **“Senior Advisory Council” Board Minority Representation Analysis TRIPS Advisory Board – Minority Representation**

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian</b>	<b>Native American</b>	<b>Asian Indian</b>
Citizens Advisory Council	62%	0%	0%	.08%	0%	30%

Outreach activities to ensure that the Citizens Advisory Council is reflective of the racial diversity of South Brunswick

The Township solicits public participation on the Citizens Advisory Council through its website at [www.sbtnj.net](http://www.sbtnj.net), which is available to the entire community and the general public. All persons interested in serving on the Citizens Advisory Council can submit an application electronically via the website or complete a fillable PDF application (available for download from the website or in person at the Township) and submit it to the Township Clerk's Office for consideration. Participation is also solicited via word-of-mouth by various Township representatives as well as the general public.