

East Windsor Township Title VI Non-Discrimination Policy Notice to the Public

East Windsor Township 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 East Windsor Township. To file a complaint, or for more information on East Windsor Township's obligations under Title VI, write to: Township Manager, 16 Lanning Boulevard, East Windsor, NJ 08520 or visit www.east-windsor.nj.us.

Transportation services provided by East Windsor Township 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 to both East Windsor Township as well as the Federal Transit Administration. Complaints may 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.

If information is needed in another language, contact 609-443-4000, ext. 414.

Si necesita información adicional, contacta con 609-443-4000, ext. 414.

Notices are posted on the East Windsor Township Municipal Website (click on 'Community Bus Information' under the Website Contents heading), in the Municipal Clerk's Office in the East Windsor Township Municipal Building located at 16 Lanning Boulevard, East Windsor, NJ, in the East Windsor Senior Center located at 40 Lanning Boulevard, East Windsor, NJ and in East Windsor's Community and Shuttle buses.

East Windsor Township Título VI No Discriminación Política Aviso al Público

East Windsor Township 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 perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja por escrito al Municipio de East Windsor. Para presentar una queja o para obtener más información sobre las obligaciones de East Windsor Township bajo el Título VI, escribir a: Administrador del municipio, 16 Lanning Boulevard, East Windsor, NJ 08520 o visite www.east-windsor.nj.us.

Servicios de transporte proporcionados por East Windsor Township son total o parcialmente financiado a través de fondos federales recibidos a través de NJ TRANSIT, y como individuo, también tiene el derecho de presentar su queja bajo el Título VI de ambas East Windsor Township, así como la Administración Federal de Tránsito . Las quejas pueden ser presentadas 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 de Estados Unidos, la Administración Federal de Transporte, Oficina de Derechos Civiles, 1200 New Jersey Avenue, SE , Washington, DC 20590.

Si necesita información adicional, contacta con 609-443-4000, ext. 414.

Los avisos se publican en el East Windsor Sitio Web Municipal del municipio (haga clic en "Información de la Comunidad Bus 'en virtud de los Contenidos rumbo), en la Oficina del Secretario Municipal en el edificio municipal de East Windsor Township situado en 16 Lanning Boulevard, East Windsor, Nueva Jersey, en el East Windsor senior Center ubicado en 40 Lanning boulevard, East Windsor, Nueva Jersey, y en los autobuses de la Comunidad y la lanzadera de East Windsor.

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 East Windsor Township may file a Title VI complaint by completing and submitting the Township's Title VI Complaint Form. East Windsor Township investigates complaints received no more than 180 days after the alleged incident. East Windsor will process complaints that are complete.

Once the complaint is received, the Township Manager's office will review it to determine if it has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Township Manager.

The Township has 45 days to investigate the complaint. If more information is needed to resolve the case, East Windsor Township may contact the complainant. The complainant has seven (7) business days from the date of the letter to send requested information to the Township Manager's office. If the Township Manager is not contacted by the complainant or does not receive the additional information within seven (7) business days, the Township can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the Township Manager reviews the complaint, s/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, s/he has seven (7) business 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.

~~Cualquier persona que se cree o se le ha discriminado por razones de raza, color u origen nacional por~~ East Windsor Township, puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI del municipio. East Windsor Township investiga las quejas recibidas no más de 180 días después del supuesto incidente. East Windsor procesará quejas que son completos.

Una vez recibida la queja, la oficina del encargado del municipio revisará para determinar si tiene jurisdicción. El demandante recibirá un acuse de recibo a él / ella informando si la queja será investigada por el encargado del municipio.

El municipio tiene 45 días para investigar la denuncia. Si se necesita más información para resolver el caso, East Windsor Township puede ponerse en contacto con el demandante. El demandante tiene siete (7) días hábiles a partir de la fecha de la carta para enviar la información solicitada a la oficina del encargado del municipio. Si el encargado del municipio no es contactado por el reclamante o no recibe la información adicional dentro de los siete (7) días hábiles, el municipio puede cerrar administrativamente el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el encargado del municipio revisa la queja, s / él emitirá una de las dos cartas al demandante: una carta cierre o una carta de encontrar (LOF). Una carta de cierre se resumen 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 supuesto incidente, y explica si posibles medidas disciplinarias, se producirá una formación adicional del miembro del personal, u otra acción. Si el demandante desea apelar la decisión, s / él tiene siete (7) días hábiles 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 Transporte en la Oficina de Derechos Civiles TLC, 1200 New Jersey Avenue SE, Washington, DC 20590.

Municipio de East Windsor			
Formulario de queja del Título VI Sección I:			
Nombre:			
Dirección:		Dirección de correo electrónico:	
Teléfono (Casa):			(Trabajo):
Requisitos de formato accesible?	Ampliación de foto de la cinta		de audio
	TDD	Otros	
Sección II:			
¿Está presentando esta queja en su propio nombre?		Si *	No
* Si su respuesta es "sí" a esta pregunta, vaya a la Sección III.			
Si no es así, por favor proporcione el nombre y la relación de la persona a la que usted se queja:			
Por favor, explique por qué se ha declarado en un tercero:			
Por favor, confirma que ha obtenido la autorización de la parte perjudicada si está presentando en nombre de un tercero.		Si	No
Sección III:			
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):			
[] Carrera [] Color [] Origen Nacional			
Fecha de la discriminación alegada (mes, día, año): _____			
Explicar lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluir 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 contacto con los testigos. Si se necesita más espacio, por favor use el reverso de esta forma.			

Sección IV			
¿Ha presentado previamente una queja del Título VI con East Windsor?		Si	No
Sección V			
¿Ha presentado esta queja con cualquier otro federal, estatal o local, o con cualquier tribunal federal o estatal?			
[] Si [] No Si es así, marque lo que corresponda: [] Agencia Federal [] Corte [] Agencia Federal para el Estado [] Corte del Estado [] Agencia Local			
Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.			
Nombre:		Título:	
Agencia:			
Dirección:		Teléfono:	
Sección VI			
Nombre de la agencia de queja es en contra:		Persona de contacto:	
Título:		Teléfono:	

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha requerida a continuación

Firma _____

Fecha _____

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

El municipio de Administrador
Localidad de East Windsor
16 Lanning Blvd.
East Windsor, NJ 08520

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.				
3.				
4.				
6.				
7.				
8.				
9.				
10				
Lawsuits				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
Complaints				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10				

Public Participation Plan

East Windsor 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.

When East Windsor Township needs to advise the public of specific projects that will have a direct impact on riders, the Township will conduct surveys of community stakeholders including houses of worship, the YMCA, government assistance agencies (including the East Windsor Welfare Office, the Mercer County Board of Social Services, the Mercer County Unemployment Office, the Mercer County Social Security Insurance Office, the Mercer County Legal Aid Office, and the Henry T. Austin Health Clinic), as well as two nonprofits in the East Windsor/Hightstown area: Rise Community Services, a nonprofit that provides access to basic services to families in need, and Better Beginnings, a nonprofit that provides free daycare services to low income families. This survey will include questions regarding demographic groups served, as well as the priorities of needs of their clients.

- East Windsor 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:

East Windsor Township publishes notices, brochures and tables regarding the Township'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:

- 1) Press releases to local and State media.
 - 2) E-newsletters.
 - 3) Website links and articles.
 - 4) On-bus advertising with interior cards and exterior banners.
 - 5) Rack cards/"take ones" placed on the bus and racks throughout the Township.
 - 6) Posters and brochures.
- **Meeting locations:** East Windsor 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 East Windsor 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, East Windsor Township conducts public meetings that use one-on-one interviews with customers. East Windsor 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. 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 ten minutes and then announce the reason of 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 East Windsor Township's analysis along with all public feedback received. The public comments are presented at Township Council meetings so that they are part of the decision making process.

- Website: East Windsor Township's website, www.east-windsor.nj.us, 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. East Windsor Township press releases and newsletters are published on the site.
- Community Events: East Windsor Township staff members regularly participate in community events that are not specific to public transit such as festivals and/or events that promote a specific community. East Windsor staffers may display and/or provide information on public transit activities and review feedback.
- Information Tables: When East Windsor wants to advise the public of specific projects that will have a direct impact on riders, the Township 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: East Windsor 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. East Windsor has associations with:
 - a. East Windsor Police Athletic League
 - b. East Windsor/Hightstown Elks Lodge
 - c. Rise Community Service Partnership
 - d. Rocky Brook Garden Club
 - e. VFW Post 5700

In addition, East Windsor Township is a part of the Delaware Regional Planning Commission's (DVRPC) Long Range Plan. DVRPC's designation as the Metropolitan Planning Organization (MPO) for this region and the regulations of the Intermodal Surface Transportation Efficiency Act (ISTEA) and subsequent transportation bills, have given the Commission an expanded and stronger role in planning to link transportation, land use, and the environment. These federal regulations mandate that DVRPC prepare and maintain a long-range plan with a minimum 20-year planning horizon. The long-range plan is updated every four years.

The DVRPC's planning initiatives include studies and projections on immigration, a community investment index, healthy communities planning, a municipal outreach program and, of course transportation planning.

Language Assistance Plan

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

East Windsor Township is responsible for the management of its Demand Response bus service and its Commuter bus service. The Township is a secondary recipient of funds from the Federal Transit Administration (FTA) for the purpose of providing public transportation. This Language Assistance Plan (LAP) applies to the East Windsor Township service area services.

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).

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

1. The number or portion of LEP persons eligible to be served or likely to be encountered by East Windsor Township.

The East Windsor Township system serves the communities of East Windsor Township and Hightstown Borough. The East Windsor Township commuter bus service operates between various points in the service area to the Princeton Junction train station in West Windsor, connecting to Northeast Corridor line rail service to cities in northern New Jersey as well as New York City. For the purpose of this document, the study area includes all of East Windsor Township's service area.

American Community Survey 5-Year Estimates from 2023 reveal that at the municipal level, while there are numerous languages spoken at home, there is one (1) language spoken where more than 1,000 people speak English less than very well. This language is included in the following table.

Table 1: Languages at the Municipal Level

Language Spoken	Number that speak English less than very well (estimated)	Percentage that speak English less than very well (estimated)
Spanish or Spanish Creole	5683	20.4%

Source: American Community Survey, 5-Year Estimates, 2023. 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."

Geographic Distribution of Total Population with Limited English Proficiency

At the time of the 2023 American Community Survey, East Windsor Township service area had a total population of 29,837 of whom 27,824 were individuals age 5 years and older. Of this population, 56.9 percent speak only English, while the remaining 43.1 percent speak other languages, either in addition to or instead of English. In East Windsor Township's service area, 20.4 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.

2. The frequency with which LEP persons come into contact with East Windsor Township.

Individuals with limited English proficiency inquire about use and are affected by service that **East Windsor Township** provides on a daily basis. Operational services include fixed route service and ADA paratransit service. Individuals with limited English proficiency also come into contact with **East Windsor Township** by calling the customer service telephone line, visiting the facility, and using the website. A significant part of the development of **East Windsor Township'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, paratransit and commuter buses
- ◆ Communication with customer service staff
- ◆ **East Windsor Township** ticket sales
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public meetings and events
- ◆ Local news advertising (print)
- ◆ Service-related posters at **East Windsor Township** bus stops

3. The Nature and Importance of East Windsor Township to People's Lives

Access to the services provided by East Windsor Township is critical to the lives of its residents. Many depend on East Windsor Township for access to trains, jobs, entertainment and essential services such as medical appointments and shopping.

Training East Windsor Township Staff

The East Windsor Township staff at all levels are aware of the need to reach out and provide information to LEP persons who rely on the transit services East Windsor Township manages. In order to ensure that new staff members understand this need, supplemental training will be provided as part of the East Windsor Township employee orientation and annual training programs. Particular attention will be given to the training of the staff people who receive requests. Additionally, staff who receive and respond to passenger requests for service changes, complaints, and other needs, shall be trained to openly receive the information from LEP and low-literacy riders, and distribute the information to the appropriate staff member of East Windsor Township or to the operator of the transit service. Training will include providing appropriate staff and The Arc of Mercer employees with relevant documentation, including a copy of the LEP Plan, and informing them of the process required to be followed when an inquiry or request is made by an LEP person. East Windsor Township will conduct periodic ridership, origin-destination and marketing surveys to ensure this LAP will continue to be implemented successfully.

A running log of all Title VI related staff trainings will be logged and kept on file. Proof of training will also be kept which will include: sign-in sheets, agendas, and certificates of completion.

East Windsor Township 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 East Windsor Township's marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, East Windsor Township 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. East Windsor Township will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

A running log of LEP outreach will be kept on file. Samples of outreach (translations of vital documents) will also be filed.

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

East Windsor Township utilizes a translation service called Language Line that is available on demand. When needed, an employee can call the Language Line number and have a translator provide interpretation services in a number of languages, including Spanish. In addition, the Township contracts with interpreters through its Municipal Court, which can be utilized throughout the Township if necessary. A dedicated phone extension plays a recorded message in Spanish, instructing callers that an interpreter will return their call. All informational flyers, notices, and other information for East Windsor Township have been translated into Spanish and notices are posted on all buses

East Windsor does not have a Transit-Related, Non-Elected Advisory Board.

Table Depicting Minority Representation on Decision-Making Bodies

Body	Caucasian	Latino	African American	Asian	Native American	Other Race
Population of the Service Area	60.7% (Including Latino)	23.7%	13.4%	22.6%	0.8%	14.2%
East Windsor Council	%100	%0	%0	%0	%0	%