

# TITLE VI PLAN

2024



1555 Gateway Boulevard, West Deptford, NJ 08096

[www.thearcgloucester.org](http://www.thearcgloucester.org)

Lisa Conley, Chief Executive Officer

856-848-8648

## **The Arc Gloucester Transportation Title VI Policy Notice to the Public**

The Arc Gloucester 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 Director of Human Resources of The Arc Gloucester. To file a complaint, or for more information on The Arc Gloucester's obligations under Title VI write to: The Arc Gloucester, 1555 Gateway Blvd., West Deptford, NJ 08096, or visit [thearcgloucester.org](http://thearcgloucester.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 with the Federal Transit Administration by writing to:

Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR, US Department of Transportation  
Federal Transportation Administration, Office of Civil Rights  
1200 NJ Avenue, SE, Washington, DC 20590

If additional information is needed in another language, contact: 856-848-8648

### **Título VI aviso al público**

The Arc Gloucester opera sus programas y servicios sin importar raza, color o origen nacional según el título VI de la ley de derechos civiles de 1964 enmendada. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja por escrito director de recursos humanos de The Arc Gloucester. Para presentar una queja o para obtener más información sobre las obligaciones de capacidades bajo el Título VI escribir: The Arc Gloucester, 1555 Gateway Blvd., West Deptford, NJ 08096, o visita [www.thearcgloucester.org](http://www.thearcgloucester.org). Servicios de transporte prestados por esta agencia son total o parcialmente financiado mediante fondos federales recibidos a través de NJ TRANSIT y como individuo también tiene el derecho a presentar su queja con la Administración Federal de tránsito escribiendo a: Coordinadora del programa Título VI, edificio este, 5° piso – TCR, los E.E.U.U. Departamento del transporte, FTA, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, DC 20590. Una queja se debe presentar dentro de 180 días de la fecha de la presunta discriminación.

Si se necesita información en otro idioma, por favor llame al 856-848-8648.

*NOTE: This information is posted in all FTA funded vehicles used to operate The Arc Gloucester RLC Transportation program, on The Arc Gloucester website and in all employee handbooks.*

## TITLE VI COMPLAINT PROCEDURES

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the New Jersey Human Relations Commission, federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

Any person who believes that he or she has been discriminated against on the basis of race, color, or national origin by contacting The Arc Gloucester (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form to The Arc Gloucester’s Human Resource Department or Title VI/Transportation Coordinator, 1555 Gateway Boulevard, West Deptford, NJ 08096. The Arc Gloucester investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

The Arc Gloucester shall conduct a prompt, thorough and impartial investigation adhering to the following procedures:

- Report the incident(s) to the Director of Human Resources, or any other appropriate designee within 180 days of the alleged occurrence. Complaints must be in writing and signed by the individual or his/her representative, and should include the name, address and telephone number, name of the alleged discriminator(s), basis of complaint (race, color, national origin) and the date(s) of the alleged act(s).
- If a complaint of discrimination is received by any supervisor, the supervisor shall report the complaint immediately to the Director of Human Resources, or any other appropriate designee.
- The Director of Human Resources will provide written acknowledgement to the complainant within 10 business days. The Chief Executive Officer and Chief Operations Officer will be copied on all correspondence.
- Within 20 business days from receipt of a complete complaint the Director of Human Resources will meet with the Chief Executive Officer and/or Chief Operations Officer to determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant an investigation.
- If the complaint has investigative merit, the Director of Human Resources, along with the Chief Operations Officer will conduct a full investigation of the complaint.
- A letter of finding will be issued within 90 days of the receipt of the complaint, by the Director of Human Resources.

- The Title VI Complaint form shall be available at The Arc Gloucester main office at 1555 Gateway Boulevard, West Deptford, NJ 08096.
- A complaint may be filed directly to the Federal Transit Administration at:  
FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590.

**Confidentiality:**

- Investigations of discrimination claims shall be conducted in a way that respects the privacy of all persons involved.
- All persons interviewed shall be directed not to discuss any aspect of the investigation with others. Failure of any employee to comply with this confidentiality directive may result in disciplinary action, up to and including termination.
- Nothing in this policy requires any employee with a complaint of discrimination to present the matter to the person who is the subject of the complaint.
- In the course of an investigation, it may be necessary to discuss the claims with the alleged discriminator and other persons who may have relevant knowledge.
- Any employee who believes he/she has been or is being subjected to discrimination, or who believes he/she has observed discrimination, and who reports the matter pursuant to this policy shall not be retaliated against or adversely treated because of the making of the complaint or his/her participation in any investigation.



The Arc Gloucester  
1555 Gateway Blvd.  
West Deptford, NJ 08096

*Achieve with us.*

856-848-8648 - Phone 856-848-7753 - Fax www.TheArcGloucester.org

Title VI of the 1964 Civil rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity receiving federal financial assistance."

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form please contact the Director of Human Resources at 856-848-8648 for assistance.

For complaints concerning Section 5310 (Senior Citizens and Persons with Disabilities), or other programs funded by the Federal Transit Administration, complete and return this form to the address above.

**Title VI Complaint Form**

***\*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 \_\_ 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: \_\_\_\_\_  
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.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

F. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Please specify and 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:

The Arc Gloucester  
Attn: Director of Human Resources  
1555 Gateway Boulevard  
West Deptford, NJ 08096

**The Arc Gloucester – Transit-related Title VI investigation, lawsuit and/or complaint log.**

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>	<b>There are no active investigations at this time.</b>			
<b>1.</b>				
<b>2.</b>				
<b>3.</b>				
<b>4.</b>				
<b>5.</b>				
<b>Lawsuits</b>	<b>There are no active lawsuits at this time.</b>			
<b>1.</b>				
<b>2.</b>				
<b>3.</b>				
<b>4.</b>				
<b>5.</b>				
<b>Complaints</b>	<b>There are no active complaints at this time.</b>			
<b>1.</b>				
<b>2.</b>				
<b>3.</b>				
<b>4.</b>				
<b>5.</b>				

The Director of Human Resources will maintain and update the above information. In addition to meeting within 20 days of individual complaints, The Chief Executive Officer, Chief Operations Officer, and Director of Human Resources will meet on an annual basis to review the above information to identify opportunities for training.





## **TITLE VI PLAN - PUBLIC PARTICIPATION PLAN ELEMENT**

The Arc Gloucester transportation program currently serves individuals with intellectual and developmental disabilities in Gloucester County. Transportation supported by the NJ Transit for FTA assistance is provided to individuals serviced through The Arc Gloucester day and residential programs, respite services, and individuals within the county with self-directed service supports. The Arc Gloucester uses several means to provide information on available transportation services and scheduling information to our consumer base including LEP (Limited English Proficient) and minority populations. The directions on obtaining this information is made available on the agency's website.

### **Public Information and Notification:**

The Arc Gloucester publishes notices, brochures and/or newsletters regarding program and transportation related services. This information is available to eligible service recipients as well as caregivers. Public notice methods include:

- Agency newsletters
- Agency brochures
- Community Events
- Notices in Vehicles
- Website/Social Media
- E-Mail Blasts

Information is available in English and will be made available in Spanish upon Request.

### **Meeting Locations:**

As an ADA compliant and Council on Quality and Leadership (CQL) world accredited agency, all public meetings held at The Arc Gloucester locations are accessible to persons with disabilities, as well as minority populations and individuals with LEP (Limited English Proficiency).

- Individual Service Plan (ISP) meetings are held for those receiving program and transportation services on an as needed basis, not less than annually. Any individual receiving services, or any individuals designated as part of their support team, are invited to attend these meetings.
- The agency supports Self-Advocacy meetings. The meetings are open to all individuals receiving services and the employees of The Arc Gloucester. The groups meet to work together to learn about speaking up for themselves and what their rights and responsibilities are. The members of the group make decisions about what the group talks about, what projects the group takes on and what the agenda for the

meeting will be. Groups have discussed subjects such as safety, individual rights, individual and group responsibilities, and conflict resolution.

- An Arc Gloucester representative attends as many Gloucester County transportation and NJ Transit public hearings as possible. Feedback from county and stakeholder surveys are shared at these meetings.

Any member of the general public, who is not currently contracted to receive services, but may have questions or concerns regarding agency programs and transportation operations, may seek assistance through The Arc Gloucester main office at 1555 Gateway Boulevard, West Deptford, NJ, 08096, or by calling (856) 848-8648.

**Direct Contact:**

Program service recipients and/or caregivers are contacted directly by a Managing Director and/or Assistant Director in regard to all program and transportation needs or accommodations. Annual service surveys will be distributed to solicit feedback on services provided, including transportation. Management will review the surveys and implement program and strategic modifications on an annual basis as appropriate.

Each service recipient is provided information regarding all programs and transportation services prior to admission for services. Information packets specific to the individual’s needs and requests are provided. Packet can be made available in Spanish or large print upon request.

**Website/Social Media:**

The Arc Gloucester maintains a website which includes information on who to contact in the event there are questions regarding program and transportation needs. Agency information, including program services, special events, and contact information is provided on the website and Social Media pages. Information regarding the agency’s statistics, budgetary information, and transparency is available on GuideStar where The Arc Gloucester maintains a platinum participation rating.

### **Community Events/Information Tables:**

The Arc Gloucester participates in various community information events throughout the year such as provider fairs. Information concerning The Arc Gloucester program and transportation services is provided at these events. Individuals who have questions or concerns about available services are encouraged to have direct consults with the appropriate administrator in charge of the program. Also, information is displayed on tables in the reception area of our main offices as well as our four businesses.

## **THE ARC GLOUCESTER LANGUAGE ASSISTANCE PLAN (LAP)**

The Arc Gloucester is a private, not-for-profit agency providing, residential and day programs, including transportation services to individuals with intellectual and developmental disabilities. The Arc Gloucester is the recipient of FTA Section 5310 grant vehicles and funds to assist in providing transportation to individuals with disabilities only, who receive services directly for The Arc Gloucester. Transportation is provided to and from employment and day programs, as well as to and from community inclusion activities. Transportation services are provided throughout Gloucester County and into bordering counties. Once referred and admitted to the agency, all individuals, including those who may be LEP, are under the supervision of trained professional staff, and provided support according to their needs while receiving program and transportation 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 12166, "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 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 Arc Gloucester uses information obtained in the Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps The Arc Gloucester communicate effectively with persons with LEP or low literacy. The Four Factor Analysis considers the following components:

- Identify the number/proportion of LEP persons served or likely to be referred and/or encountered by The Arc Gloucester.
- Frequency with which LEP persons come into contact with The Arc Gloucester.
- Nature and importance of the activities, programs, and services to people's lives.
- 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 for the four factor analysis for The Arc Gloucester.

## **Description of the Limited English Proficient Population Served**

The Arc Gloucester provides services to eligible individuals throughout Gloucester County. For the purpose of this document, the study is based on all individuals served in this area. Research and census data analysis of Gloucester County indicates 1.42% of the population are limited English speaking. Of that 1.42%, 31.3% speak Spanish, 68.7% speak other languages. It has been the experience of The Arc Gloucester that this small percentage has not created a significant obstacle for individuals with intellectual and developmental disabilities who choose to access transportation services provided by the agency. The Arc Gloucester serves approximately 200 individuals on an annual basis. The following table reflects the languages of those individuals.

An agency survey was conducted. The chart below represents the languages spoken by individuals served by The Arc Gloucester residential and day programs, based on the information provided by those who responded:

<b>Language Spoken</b>	<b>Estimated Number that speak English less than very well</b>	<b>Percentage that speak English less than very well</b>
Spanish	3	1.5%
Non-verbal	30	12%
Require assistance to communicate	34	17%

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

### **SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES**

**2022 United States Census Bureau**

<b>Household Language</b>	<b>New Jersey</b>		<b>Gloucester County, New Jersey</b>	
	<b>Estimate</b>	<b>Margin of Error</b>	<b>Estimate</b>	<b>Margin of Error</b>
<b>Total:</b>	3,516,978	±9,044	111,781	±1,559
English only	2,288,506	±12,328	96,975	±2,169
Spanish:	600,667	±7,827	6,607	±828
Limited English speaking household	145,117	±7,388	497	±332
Not a limited English speaking household	455,550	±9,112	6,110	±904
Other languages:	627,805	±9,774	8,199	±1,344
Limited English speaking household	102,904	±5,813	1,091	±560
Not a limited English speaking household	524,901	±9,194	7,108	±1,328

Ancestry	New Jersey		Gloucester County, New Jersey	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Total:	9,261,699	*****	306,601	*****
Ancestry specified:	7,341,209	±40,905	238,727	±6,791
Single ancestry	4,982,932	±40,463	125,571	±6,547
Multiple ancestry	2,358,277	±33,826	113,156	±6,195
Ancestry not specified:	1,920,490	±40,905	67,874	±6,791
Ancestry unclassified	133,688	±10,027	6,920	±1,867
Ancestry not reported	1,786,802	±39,841	60,954	±6,703

Source: U.S. Census Bureau, 2022

**Frequency of use by the Limited English Proficient Population:**

Individuals with limited English proficiency inquire about use and are affected by services that The Arc Gloucester programs, and transportation provides on a regular basis. Individuals with limited English proficiency come into contact with the agency through their case manager, support coordinator, caregiver, or guardian. A significant part of the development of The Arc Gloucester Language Assistance Plan is the assessment of major points of contact, which include the following:

- Participant surveys
- Case management inquires
- Caregiver inquires
- Communication with program managers
- Support Coordinator inquires
- Community outreach, meetings and events

**Employee Survey:**

To better understand the frequency with which LEP service recipients come into contact with The Arc Gloucester, an informal survey was conducted on February 29, 2024, with program managers and supervisors. Of those who responded, there are three (3) individuals requiring ESL interpretation services and 64 individuals who are non-verbal or need communications services due to their disability.

**Importance of The Arc Gloucester Transportation Service to People’s Lives:**

Access to services provided by The Arc Gloucester is critical to the lives of those with intellectual and developmental disabilities who depend on our transportation services to access employment, training opportunities, daily skill training, volunteer, and recreational opportunities. Our day program services recipients are 91% reliant and depend not only on The Arc Gloucester set fixed route services, but contracted Gloucester County Transportation services as well. 91% of the individuals served utilize these transportation

services to attend day/employment programs at one of The Arc Gloucester locations. 9% of individuals receiving services utilize public and/or private transportation for Supported Employment services.

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

The Arc Gloucester currently serves Limited English Proficient persons directly related to their disability. Personnel and staff are employed and/or trained to interpret needs based on an individual's means of communication. A variety of techniques are used to communicate with these individuals that include non-verbal language (symbols and sign language) and appropriate technology such as communication boards or tablets.

### **Training Staff:**

Title VI compliance training is included as part of all pre-service trainings. Additional trainings are provided on a case by case basis when a new LEP individual enters a program. Compliance is reviewed and updated annually during program meetings as well as the individual's annual meeting.

The Arc Gloucester employs approximately 16 individuals who are bilingual. Individuals proficient in sign language are hired as needed.

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

Vital documents, including but not limited to, program and transportation information are made available in large print and/or Spanish upon request. Personal meetings with appropriate staff, including the aforementioned staff, are scheduled in a timely fashion when requested or necessary for optimal communication.

### **Outcomes-Monitoring, Evaluating and Update:**

As part of the agency's Compliance Committee, The Arc Gloucester conducts annual individual, caregiver, staff, and business reviews designed to solicit input on the quality of all services provided. Management, case managers and program supervisors review, evaluate and update any potential issues that may arise resulting from the annual program review. Changes, corrections, and/or improvements are recommended and implemented as needed.

## **Resources and Cost for LEP Outreach**

The Arc Gloucester is committed to improving access to program and transportation services for LEP service recipients. The budget for marketing and professional services is evaluated on a monthly basis and modified based on reported needs and analysis. All programs are subject to an annual evaluation by the Compliance Committee designed to identify areas in need of improvement, including the Language Assistance Plan.

## **Membership**

Membership of The Arc Gloucester non-elected committees and councils is comprised of volunteers and staff members with a special and/or common interest. Membership is voluntary and varies from year to year. The Arc Gloucester continually seeks and encourages membership of all individuals, regardless of race, interested in improving the life of individuals with intellectual and developmental disabilities in Gloucester County.

The chart below details the ethnic composition of Gloucester County based on US Census Bureau 2022.

<b>Ethnic Group</b>	<b>New Jersey</b>	<b>Gloucester County</b>
<b>Total:</b>	<b>9,288,994</b>	<b>302,294</b>
Hispanic or Latino	2,002,575	22,135
Not Hispanic or Latino:	7,286,419	280,159
Population of one race:	6,996,948	267,855
White alone	4,816,381	225,355
Black or African American alone	1,154,142	31,517
American Indian and Alaska Native alone	11,206	331
Asian alone	942,921	9,475
Native Hawaiian and Other Pacific Islander alone	1,944	74
Some Other Race alone	70,354	1,103
Population of two or more races:	289,471	12,304
Population of two races:	272,852	11,547
Population of three races:	14,950	708
Population of four races:	1,449	42
Population of five races:	197	7
Population of six races:	23	0

The Arc Gloucester non-elected committees and councils representation analysis:

	<b>African American</b>	<b>Hispanic Latino</b>	<b>American Indian</b>	<b>Asian</b>	<b>Caucasian</b>
<b>Gloucester County Population</b>	10%	7%	<1%	3%	75%
<b>The Arc Gloucester Committees</b>	7%	7%	0	0	89%