



**COUNTY OF HUDSON**

**Department of Health and Human Services –  
Transcend Division**

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**Title VI Program**

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## **Non-Discrimination Policy**

### **NOTICE TO THE PUBLIC**

To date, the Hudson County Department of Health and Human Services/ Transcend Division has had no lawsuits or administrative complaints brought against it alleging discrimination in any form. However to make Transcend riders aware of its commitment to adhere to Title VI guidelines, and of their right to file a civil rights complaint, Transcend will present the following posting on its official website, in County facilities open to the general public and on Transcend buses:

*Transcend gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, and all related statutes. In accordance with Title V of the Civil rights Act of 1964, Transcend operates its programs and services without preference or exclusion to services in reference to race, color, gender economic status, language proficiency or national origin. 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 Department of Health and Human Services/Transcend Division. To file a complaint or for additional information on the Department of Health and Human Services/Transcend Division obligations under Title VI write to: 595 County Avenue Secaucus, NJ 07094 or visit the Transcend website at: **[hudsoncountynj.org/about-transcend](http://hudsoncountynj.org/about-transcend)***

*The transportation services provided by this agency are in whole or part funded through federal financial assistance received through NJ TRANSIT. As an individual you also have the right to file your complaint under Title VI to the Federal Transit Administration by writing to: FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.*

If information is needed in another language, contact the Transcend Division at 201-369-4320.

Si se necesita información en otro idioma, comuníquese con la División de Transcend a 201-369-4320.

*Arabic*

*Hindi*

## **Title VI Complaint Procedures**

In addition to the above notice, Transcend has established a process for consumers to file a complaint under Title VI. Any individual or group of individuals that believes that she or he has been discriminated against on the basis of race, color, gender, age, national origin, English proficiency or economic status by the Hudson County Department of Health and Human Services/ Transcend Division ("the Authority"), may file a Title VI complaint in writing by completing and submitting the authority's Title VI Complaint Form located in the appendix. The Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will only process complaints that are complete.

Complaints will be accepted in writing and may be filed at Hudson County Department of Health and Human Services/Transcend Division 595 County Ave. Secaucus, NJ 07094. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Individuals may also file complaints directly with the US Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA). Complaints filed directly to the FTA shall be addressed to FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Complaints may also be filed by:

- Calling Transcend at 201-369-4320 or
- Emailing Transcend at [transcend@hcnj.us](mailto:transcend@hcnj.us)

Complaints should include, at a minimum, the following information:

- The name, address, and telephone number where the Complainant can be reached during business hours;
- A general description of the person or class of persons injured by the alleged discriminatory acts; and
- A description of the alleged discriminatory acts in sufficient detail to enable Transcend to understand what occurred, when it occurred, and the basis of the alleged discrimination complaint (race, color, or national origin).

The complaint must be signed and dated by the person filing the Complaint or by someone authorized to do so on his or her behalf. See Appendix B for a Copy of the Complaint Form.

## **Procedure Upon Receiving The Complaint**

Once the Authority receives the complaint, the Authority will refer it to the County's Law Department for review.

The Law Department will assign a file number and determine whether the complaint is valid under applicable law.

The complainant will receive an acknowledgment letter informing him or her whether the complaint will be investigated.

With respect to a complaint that will be investigated, the Authority has 30 days from the date of the acknowledgment letter to perform the investigation, subject to the complexity of the complaint and the availability of witnesses.

If more information is needed to resolve the case, the investigator may contact the complainant. The complainant has 10 days from the date of the investigator's request for additional information to respond to the investigator. If the complainant is able to provide the additional information, he or she has 10 days to do so. If the complainant does not respond to the investigator's request, if the complainant does not provide the additional information, or if the complainant does not wish to pursue the case, the Authority can administratively close the case.

After an investigation, the Authority will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF).

A closure letter summarizes the allegations, states that a Title VI violation was not found, and advises that the case will be closed.

A LOF summarizes the allegations, the investigation information, and the Authority's findings. The LOF will also describe the action to be taken by the County; e.g., steps to improve service, additional training of staff.

A complainant may appeal the Authority's decision to the Federal Transit Administration. The contact information for the Federal Transit Administration appears below.

Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

A complainant may also file a complaint directly with the Federal Transit Administration.

If information is needed in another language, please contact telephone number 201-369-4320 or email your request to: ***transcend.hcnj.us***

Si se necesita información en otro idioma, por favor póngase en contacto con el número de teléfono 201-369-4320 o por correo electrónico su solicitud a: ***transcend.hcnj.us***

*Arabic*

*Hindi*

**Hudson County Transcend Complaint Form**

Title VI of the 1964 Civil Right 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.”

If you believe you or a group of individuals has been subject to discrimination, please complete the following form. If you require assistance, please contact Transcend and we will provide guidance.

The completed complaint form can be mailed or emailed to the following address:

***Hudson County Department of Health and Human Services/ Transcend Division  
595 County Avenue, Building 1  
Secaucus, NJ 07094  
Telephone 201-369-4320/  
Email: transcend.hcnj.us***

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, if applicable)

- Large Print
- TDD
- Audio Tape
- Other (specify) \_\_\_\_\_

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:

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

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

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

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

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

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

Other:

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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 describe the action you would like the County to take in order to remedy the alleged discrimination.

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

H. Submit form and any additional information to:

***Hudson County Department of Health and Human Services/ Transcend Division  
595 County Avenue, Building 1  
Secaucus, NJ 07094  
Telephone 201-369-4320/  
Email: transcend.hcnj.us***

Complaints may also be filed directly with:

**Federal Transit Administration  
FTA Office of Civil Rights  
1200 New Jersey Avenue SE, Washington, NJ 20590**

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

Attachments: Yes \_\_\_\_\_ No \_\_\_\_\_

Print name: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## Title VI Complaint Tracking Log

As a recipient of Federal financial assistance and in accordance with the Title VI of the Civil Rights Act of 1964, the Department of Health and Human Services-Transcend Division will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the Authority.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the Authority in response, or final findings related to the investigation, lawsuit, or complaint.

The following is a sample form that will be used to track 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.				

## **Public Participation Plan**

The Hudson County Department of Health and Human Services – Transcend Division (HCDHHS – Transcend Division) 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.

The HCDHHS – Transcend Division 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.

The HCDHHS – Transcend Division has developed this Public Participation Plan to ensure that services are provided in a manner that allows for full and fair access by all eligible Hudson County Residents. Transcend has assessed the need for services and materials for persons whom English is not their primary language, and who have a limited ability to read, write, speak, or understand English. In an effort to accommodate the Hudson County Community and LEP population in particular, in the public participation activities, the following measures will be taken:

- When a project or program may affect a particular population, specific neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to neighborhood organizations and published in the local language newspapers, as defined in the proposed LAP.
- All public notices and public hearing notices will be provided in clear, concise and understandable language. Notices will incorporate graphics when it aids the message. The notice will be clearly titled as a TRANSCEND notification. Notices will be translated into languages that meet the Safe Harbor threshold.
- The public will be afforded the opportunity to be involved in the public decision-making process, through available means including, public notification, neighborhood meetings and public hearings.
- Transcend will offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of exposed transportation decisions. Outreach activities will target special populations including LEP populations, older adults and people with disabilities.
- Public meetings will be held in location(s) that are accessible to public transit riders and persons with disabilities. In addition, transportation services will be provided by TRANSCEND to eligible populations that are interested in these forums. The meetings will be scheduled at a convenient time to encourage participation from the public. Individuals that are disabled or have issues with mobility may be provided transportation to public meetings and hearings upon request.
- Public meeting and hearings will be advertised in local newspapers in English and in newspapers circulated in the languages identified in the LAP. Also, public meetings and hearings will be posted on the Transcend webpage.
- Public meetings will be held during the day and light snacks will be provided for attendees.
- From time to time, matters related to Transcend and brought before the Hudson County Board of Chosen Freeholders. Freeholder board meetings are open to the public. The meeting schedule is posted on the Hudson County Website.

## **Targeted Outreach to Minority and Limited English Proficiency Populations**

TRANSCEND has incorporate strategies intended to promote the involvement of minority and LEP individuals in public participation activities as appropriate for the plan, project or service in question. The outreach will be presented in compliance with Federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the US Department of Transportation LEP Guidance.

TRANSCEND will implement the following public engagement strategies to complement TITLE VI requirements, as appropriate to the plan, project or type of service:

- Posting of notices on all TRANSCEND operated buses in reference to proposed projects or service changes.
- A notice of scheduled Citizen Advisory Committee meetings, which take place six times a year, will be posted thirty days prior to the meeting on the Transcend official webpage and vehicles. The notice will state the time, date and location of the meeting, and that transportation is available by request. All posted information will include picture boards as well as clear language reminding participants that all TRANSCEND buses and meeting locations are handicapped accessible.
- Incorporate specific outreach strategies for LEP populations, which will include surveys and or focus groups pertaining to proposed project or service changes.
- Transcend staff will attend local community events such as; meetings of neighborhood associations, advocacy groups, senior citizen organizations and other groups in the twelve municipalities within Hudson County to solicit feedback and concerns from the public.

## **Addressing Public Comments and Incorporating them into Decision Making**

All comments received through the public participation plan will be given consideration. All comments will be assembled into a single document and presented to the TRANSCEND Citizens Advisory Committee for review and consideration in accordance with the Title VI guidelines and mission.

## **Identification of Stakeholders**

Stakeholders are those who are directly or indirectly affected by a plan or by the recommendations given in the plan. Those who may be adversely affected or who may be denied benefit of a plan's recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizen residents, minority and low-income persons, public agencies, as well as private organizations and businesses. While stakeholders may vary based on the plan or programs, TRANSCEND maintains a list of stakeholders, as a result of our United We Ride Program, with whom it communicates with through email and direct mail.

Any community organization or individual can be added to TRANSCEND's stakeholder list and receive regular communications regarding service changes by contacting TRANSCEND at 201-369-4320. Local organizations or businesses can also request a speaker from TRANSCEND to attend one of their regular meetings by contacting the same number.

For additional information on TRANSCEND'S Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166- Improving Access to Services for Persons with Limited English Proficiency please contact the following representative:

Mr. Kevin Crimmins  
 Hudson County Department of Health and Human Services  
 Transcend Division  
 595 County Avenue, Building 1  
 Secaucus, NJ 07094  
 Tel# 201-369-4320  
 Fax 201-369-4318  
 Email: kcrimmins@hcnj.us

**Hudson County Department of Health and Human Services  
 TRANSCEND's Board Representation Analysis**

<b>Body</b>	<b>Caucasian</b>	<b>Hispanic Latino</b>	<b>African American</b>	<b>Asian</b>	<b>Native American</b>	<b>Pacific Islander/ Native Hawaiian</b>	<b>INSERT RACE</b>
Population of the Service Area	%66.0	%42.9	%15.1	%15.0	%1.2	%.2	
Sub-recipient Advisory Board	Not applicable						
Citizens Advisory Council	%73.0	%9.0	%18.0	-	-	-	
INSERT OTHER BOARD/COUNCIL	Not Applicable						

**HUDSON COUNTY DEPARTMENT OF  
HEALTH AND HUMAN SERVICES –  
TRANSCEND  
(HCDHHS – TRANSCEND)  
Language Assistance Plan (LAP) to  
Address Service to  
Individuals with Limited English  
Proficiency (LEP)**

HUDSON COUNTY DEPARTMENT OF HEALTH AND HUMAN SERVICES-TRANSCEND (HCDHHS-TRANSCEND) is responsible for the management of the County’s paratransit service. The County is the Primary Recipient of funds from the Federal Transit Administration (FTA) for the purpose of providing transportation. Sub-Recipients within the County receive their FTA funds for public transportation through the County. The sub-recipients include the service area for the HCDHHS-TRANSCEND service. This Language Assistance Plan (LAP) applies to the HCDHHS-TRANSCEND service area and to the public services of the Sub-Recipients.

This document has been prepared to conform to the Limited English Proficiency (LEP) requirements identified in 

<b>Language Spoken</b>	<b>Number that speak English less than very well (estimated)</b>
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 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 HCDHHS – TRANSCEND uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps HCDHHS – TRANSCEND to 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 HCDHHS – TRANSCEND.
- 2) The frequency with which LEP persons come into contact with HCDHHS – TRANSCEND.
- 3) The nature and importance of HCDHHS - TRANSCEND 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 HCDHHS – TRANSCEND.

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

The HCDHHS – TRANSCEND system serves communities in all twelve municipalities within the HCDHHS – TRANSCEND service area. The HCDHHS – TRANSCEND service operates between various points in the service area. For the purpose of this document, the study area includes all of HCDHHS – TRANSCEND service area.

American Community Survey 5-Year Estimates from 2008-2012 reveal that at the county level, while there are numerous languages spoken at home, there are three (3) languages spoken where more than 1,000 people speak English less than very well. Those three (3) languages are included in the following table.

**Table 1: Languages at the County Level**

Source: American Community Survey, 5-Year Estimates, 2012. It is noted that this data categorizes Limited English Proficiency as persons who speak English “less than very well”, which includes residents who speak English “well”, while LEP is generally considered persons who speak English “not well” or “not at all”. This definition artificially inflates the entire LEP persons total, including raising the number of Arabic and Hindi speaking persons above the 1,000-person threshold.

Spanish or Spanish Creole	<b>303,417</b>
Arabic	<b>3,384</b>
Hindi	<b>1,547</b>

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

At the time of the 2010 American National Census, HCDHHS – TRANSCEND service area had a total population of 634,266 people. Of this population, 61.4 percent speak English, while the remaining 48.6 percent speak English “not well” or “not at all”. This compares to the State LEP population of 7.1 percent.

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

**Spanish**

Much like the State overall, the largest share of the LEP population in HCDHHS – TRANSCEND service area speaks Spanish as their primary language. Statewide, 56.3 percent of the LEP population, ages five (5) and older, are Spanish-speaking.

**Other Languages**

LEP persons who speak Indo-European languages other than English or Spanish are heavily concentrated in Jersey City. In the census tracts that make up these communities, LEP persons who speak “other Indo-European” languages range start at approximately 2 percent of the LEP population

Within the cluster of census tracts with high LEP populations, of which more than half speak other Indo-European languages, there is spatial separation related to which languages are spoken. In Jersey City, the most frequently spoken language, besides Spanish and English, is Arabic. Also in Jersey City, the most frequently spoken language, apart from the others previously mentioned, is Hindi. Italian, Polish, Russian and Tagalog are other commonly spoken languages in various Hudson County communities.

**Limited English Proficient Population Concentrations and Transit Service**

The concentrations of population with Limited English Proficiency are predominantly located among the following Hudson County municipalities: Jersey City, Union City, North Bergen and West New York. Consumers in need of specialized transportation in these areas are heavily served by HCDHHS – TRANSCEND services.

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

Individuals with limited English Proficiency inquire about use and are effected by service that HCDHHS – TRANSCEND provides on a daily basis. Individuals with limited English proficiency also come into contact with HCDHHS – TRANSCEND by calling the customer service telephone line, visiting the facility, using the website and calling into the translation line service. A significant part of the development of the HCDHHS – TRANSCEND’s Language Assistance Plan is the assessment of major points of contact, which include, but are not limited to, the following:

- ◆ Riding buses
- ◆ Communication with customer service staff
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public events
- ◆ Dispatcher employees

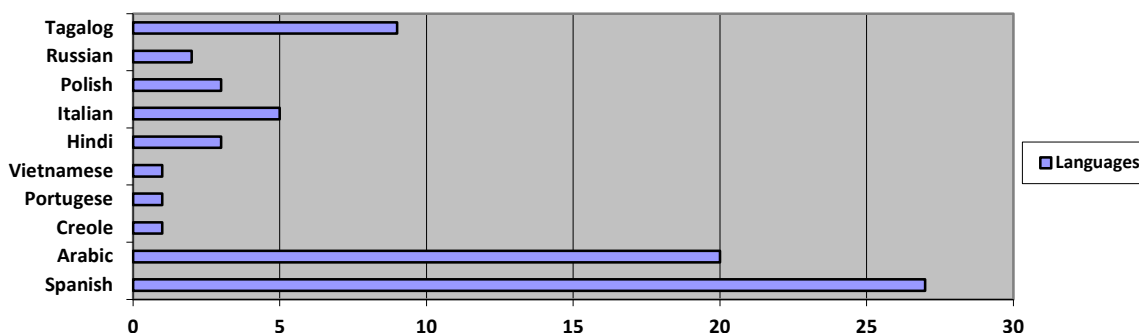
### Employee Survey

In Spring 2015, to better understand the frequency with which LEP riders come into contact with HCDHHS – TRANSCEND services, HCDHHS – TRANSCEND conducted internal surveys of customer service staff. The survey tool was aimed at determining what language skills already exist among HCDHHS – TRANSCEND employees and the vendor’s employees. Additionally, we surveyed the number/ nature of encounters with riders or other community members to see if and where language has been a barrier. A language survey was distributed to HCDHHS – TRANSCEND employees and vendors. A total of 27 surveys were completed. The results of the employee/vendor survey effort are described below. Twenty-two (22), or 81.4%, of employees and vendors reported that they do not find that language barriers are preventing them from providing services to consumers. In terms of addressing language barriers should they come across any, 20 respondents, 74% said they have bilingual staff. A quarter of respondents, 7 responses, utilized language line service to help and the remaining three respondents said they use interpreters.

The languages most often encountered by HCDHHS – TRANSCEND employees and their vendor’s employees are provided in the following chart (Exhibit 1). Employees were asked to list the frequency with which they come into contact with the most commonly spoken languages (according to American Community Survey).

Most interactions between the HCDHHS – TRANSCEND’s employees and respective passengers with Limited English Proficiency (LEP) are over the phone. However, the majority of the vendors interact with the consumers on a face-to-face basis.

**Graph 1: Frequency of Encountering Different Languages by Employees and Vendors of HCDHHS – TRANSCEND**



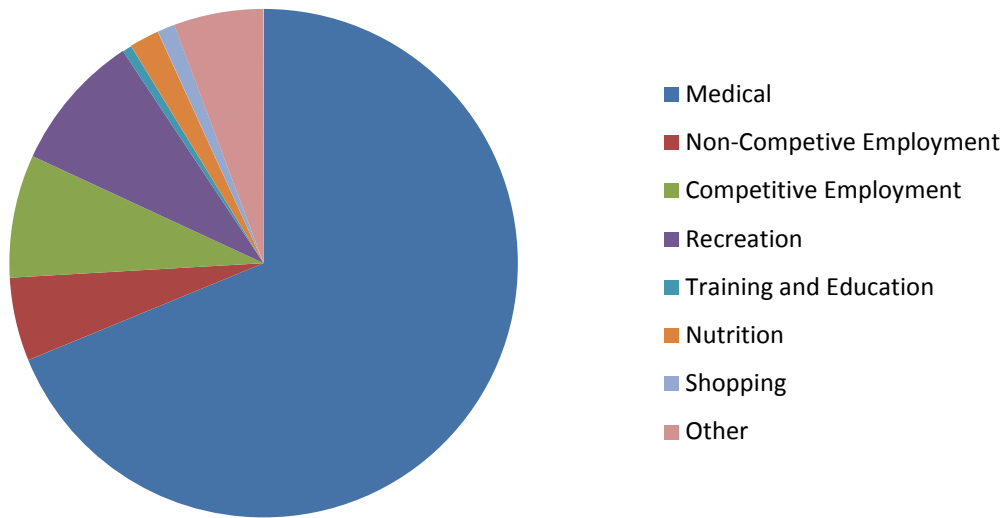
### 3. Importance of HCDHHS - TRANSCEND to People’s Lives

Access to the services provided by HCDHHS – TRANSCEND is critical to the lives of many who depend on HCDHHS – TRANSCEND for access to jobs and essential services. The 2014 Annual Ridership Report cited various trip purposes for the passengers. The majority of passengers, 68.6%, use the services for Medical purposes. 8.75% use the services for recreation. Employment takes up a total of 13.1%; non-competitive employment is 5.3%, with competitive employment making up 7.8% of all total trips. Training and education makes up .6%, nutrition 1.9% and shopping 1.1%. Trips not specified under these categories are considered “Other”, which accounts for 5.7% of all trips made. Please Note, however, that TRANSCEND only serves 2% of the County population, so County residents do use other forms of transportation.

**Graph 2: Trip Purpose for Riders with Limited English Proficiency, 2012 Survey**



## Trip Purpose



HCDHHS – TRANSCEND understands that if Limited English Proficiency or low-literacy is a barrier to using their services, then the consequences for the individual could limit a person’s ability to obtain necessary medical care, employment or education. Vital information that can affect a person’s access to services include the following:

### Types of Vital Information

- ◆ Route and schedule information
- ◆ Service Announcements, including Weather-Related Service Changes
- ◆ Safety and security announcements
- ◆ Complaint and comment forms

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

HCDHHS – TRANSCEND utilizes the services of a language line service. This lets consumers call and make their trip reservations in their native language so that there are no difficulties with communication. There are also bilingual employees who are able to help consumers navigate the reservation process. Also, it has been observed that some consumers have English-speaking persons call to make the reservations for them. In addition, consumers sometimes use family and friends as interpreters.

### Training HCDHHS – TRANSCEND Staff

The HCDHHS - TRANSCEND staff at all levels are aware of the need to reach out and provide information to LEP persons who rely on the transit services. In order to ensure that new staff members understand this need, diversity trainings are provided as part of the employee orientation and annual training programs.

All HCDHHS – TRANSCEND employees will be made aware of the regularly updated Department of Social Services translators list and services. HCDHHS – TRANSCEND staff and the operators of the transit systems should be trained so that they may recognize the specific needs of each LEP community and how to assist transit-dependent LEP or low-literacy persons in using the service and having their requests or complaints addressed.

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

While HCDHHS – TRANSCEND 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 effect a community in which there is a large population of LEP individuals who speak other languages, such as Arabic or Hindi, HCDHHS – TRANSCEND may rely on other county resources for interpreting and translation services.

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

HCDHHS – TRANSCEND worked to acquire LEP and spoken language data so that accurate profiles of transit riders could be established and measures could be taken to reach out to the LEP population to plan accordingly. To ensure this LAP will continue to be implemented successfully, HCDHHS – TRANSCEND will work to evaluate all information received from surveys, outreach efforts, staff contact and trainings. The plan will be reviewed annually for updates as needed, while also developing new concepts for implementation in the next plan. HCDHHS – TRANSCEND 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**

HCDHHS - TRANSCEND 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 HCDHHS – TRANSCEND’s marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, HCDHHS – TRANSCEND concluded that there are currently outreach materials available primarily for Spanish speaking individuals in the service area. Based on all aspects of the Four Factor Analysis, the availability of interpreters is currently 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 at this time. However, the HCDHHS – TRANSCEND has established a near-term goal to include the translation of vital documents into Arabic and Hindi, based on available resources and funding for such activities. HCDHHS – TRANSCEND will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.