

Title VI Non-Discrimination Policy

Bayonne Economic Opportunity Foundation 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 Bayonne Economic Opportunity Foundation. To file a complaint, or for more information on Bayonne Economic Opportunity Foundation obligations under Title VI write to: 555 Kennedy Blvd. PO Box 1032, Bayonne, NJ 07002 or visit

www.beof.org. Transportation services provided by this agency are in whole or part funded through federal funds received through NJ TRANSIT and as an individual you also have the right to file your complaint to both Bayonne Economic Opportunity Foundation as well as the Federal Transit

Administration. Complaints may also be filed with the Federal Transit Administration in writing and may be addressed to:

Title VI Program Coordinator
East Building, 5th Floor – TCR, U.S. Department of Transportation
Federal Transit Administration, Office of Civil Rights
1200 New Jersey Avenue, SE, Washington, DC 20590

Dissemination

A copy of this policy is available at the following locations:

- Main Building – 555 Kennedy Blvd. Bayonne, NJ 07002
- On our Senior Transportation Bus.
- www.beof.org

If information is needed in another language, contact 201-437-7222

Si necesita información en otro idioma, comuníquese al 201-437-7222.

إذا كنت بحاجة إلى معلومات بلغة أخرى، يرجى الاتصال على الرقم 201-437-7222.

Política de No Discriminación del Título VI

La Fundación de Oportunidades Económicas de Bayonne opera sus programas y servicios sin distinción de raza, color u origen nacional, de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, según enmiendas. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja por escrito a la Fundación de Oportunidades Económicas de Bayonne.

Para presentar una queja, o para obtener más información sobre las obligaciones de la Fundación de Oportunidades Económicas de Bayonne bajo el Título VI, escriba a:

555 Kennedy Blvd., PO Box 1032, Bayonne, NJ 07002

o visite www.beof.org.

Los servicios de transporte proporcionados por esta agencia están total o parcialmente financiados con fondos federales recibidos a través de NJ TRANSIT, y como individuo también tiene el derecho de presentar su queja tanto a **(NOMBRE DE LA AGENCIA)** como a la Administración Federal de Tránsito.

Las quejas también pueden presentarse por escrito a la Administración Federal de Tránsito a la siguiente dirección:

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

سياسة عدم التمييز بموجب الباب السادس (Title VI)

تقوم مؤسسة بايون للفرص الاقتصادية بتشغيل برامجها وخدماتها دون تمييز على أساس العرق أو اللون أو الأصل القومي، وذلك وفقًا للباب السادس من قانون الحقوق المدنية لعام 1964، بصيغته المعدلة. يحق لأي شخص يعتقد أنه تعرض لمعاملة تمييزية غير قانونية بموجب الباب السادس تقديم شكوى خطية إلى مؤسسة بايون للفرص الاقتصادية.

لتقديم شكوى، أو للحصول على مزيد من المعلومات حول التزامات مؤسسة بايون للفرص الاقتصادية بموجب الباب السادس، يُرجى الكتابة إلى:

555 Kennedy Blvd., PO Box 1032, Bayonne, NJ 07002

أو زيارة الموقع الإلكتروني www.beof.org

ولك الحق أيضًا، NJ TRANSIT، يتم تمويل خدمات النقل التي تقدمها هذه الوكالة كليًا أو جزئيًا من خلال الأموال الفيدرالية المستلمة عبر. كفرد في تقديم شكواك إلى كل من (اسم الوكالة) وكذلك إلى إدارة النقل الفيدرالية.

يمكن أيضًا تقديم الشكاوى كتابيًا إلى إدارة النقل الفيدرالية على العنوان التالي:

Title VI Program Coordinator

East Building, 5th Floor – TCR

وزارة النقل الأمريكية

إدارة النقل الفيدرالية، مكتب الحقوق المدنية

1200 New Jersey Avenue, SE

واشنطن العاصمة 20590

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 Bayonne Economic Opportunity Foundation (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Bayonne Economic Opportunity Foundation investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

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

The Authority has 3 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has XX business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within XX business days, the Authority can administratively close the case. The case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has XX 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

Procedimiento para Presentar una Queja del Título VI

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional por la Fundación de Oportunidades Económicas de Bayonne (en adelante “la Autoridad”) puede presentar una queja del Título VI completando y enviando el Formulario de Queja del Título VI de la agencia. La Fundación de Oportunidades Económicas de Bayonne investiga las quejas recibidas dentro de los 180 días posteriores al presunto incidente. La Autoridad solo procesará quejas completas.

Una vez que se reciba la queja, la Autoridad la revisará para determinar si nuestra oficina tiene jurisdicción. El/la denunciante recibirá una carta de confirmación informándole si la queja será investigada por nuestra oficina.

La Autoridad tiene 3 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad podrá comunicarse con el/la denunciante. El/la denunciante tiene XX días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no recibe contacto o la información adicional dentro de los XX días hábiles, la Autoridad podrá cerrar el caso administrativamente. El caso también puede cerrarse administrativamente si el/la denunciante ya no desea continuar con su queja.

Después de revisar la queja, el/la investigador/a emitirá una de dos cartas al denunciante: una carta de cierre o una carta de determinación (LOF, por sus siglas en inglés). Una carta de cierre resume las alegaciones e indica que no hubo violación del Título VI, y que el caso será cerrado. Una LOF resume las alegaciones y las entrevistas sobre el incidente presunto, y explica si habrá alguna acción disciplinaria, capacitación adicional para el personal u otra medida. Si el/la denunciante desea apelar la decisión, tiene XX días a partir de la fecha de la carta o la LOF para hacerlo.

Una persona también puede presentar una queja directamente ante la Administración Federal de Tránsito en:

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

(Title VI) إجراءات تقديم شكوى بموجب الباب السادس

يحق لأي شخص يعتقد أنه تعرض للتمييز على أساس العرق أو اللون أو الأصل القومي من قبل مؤسسة بايون للفرص الاقتصادية عن طريق تعبئة وتقديم نموذج الشكوى (Title VI) ويُشار إليها فيما بعد بـ "الهيئة" تقديم شكوى بموجب الباب السادس الخاص بالباب السادس التابع للوكالة. تقوم الهيئة بالتحقيق في الشكاوى المستلمة خلال مدة لا تتجاوز 180 يوماً من تاريخ الحادث المزعم. ولن تعالج الهيئة إلا الشكاوى المكتملة.

بمجرد استلام الشكوى، ستقوم الهيئة بمراجعتها لتحديد ما إذا كانت لها صلاحية النظر فيها. وسيتلقى مقدم الشكوى رسالة تأكيد تُبلغه ما إذا كانت الشكوى ستُحقق فيها الهيئة.

لدى الهيئة 3 أيام للتحقيق في الشكوى. إذا كانت هناك حاجة إلى مزيد من المعلومات لحل القضية، قد تتواصل الهيئة مع مقدم يوم عمل من تاريخ الرسالة لإرسال المعلومات المطلوبة إلى المحقق المكلف بالقضية. إذا XX الشكوى. ويتوفر لمقدم الشكوى مدة يوم عمل، يمكن للهيئة إغلاق القضية إدارياً. كما يمكن إغلاق XX لم يتم التواصل مع المحقق أو لم يتلقَ المعلومات الإضافية خلال القضية إدارياً إذا لم يعد مقدم الشكوى يرغب في متابعة الشكوى.

تلخص رسالة (LOF) بعد أن يُراجع المحقق الشكوى، سيصدر إحدى رسالتين لمقدم الشكوى: إما رسالة إغلاق أو رسالة نتائج فتلخص (LOF) الإغلاق الادعاءات وتوضح أنه لم يتم العثور على انتهاك للباب السادس، وأن القضية ستُغلق. أما رسالة النتائج الادعاءات والمقابلات المتعلقة بالحادث المزعم، وتشرح ما إذا كان سيتم اتخاذ أي إجراء تأديبي، أو تدريب إضافي للموظف، أو يوماً من تاريخ الرسالة أو رسالة XX أي إجراء آخر. إذا رغب مقدم الشكوى في استئناف القرار، فله الحق في القيام بذلك خلال النتائج.

كما يمكن لأي شخص تقديم شكوى مباشرة إلى إدارة النقل الفيدرالية على العنوان التالي:

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

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.

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:

Bayonne Economic Opportunity Foundation
555 Kenndy Blvd.
Bayonne, NJ 07002

Formulario de Queja del Título VI

Nota: La siguiente información es necesaria para ayudar en el procesamiento de su queja.

A. Información del/la denunciante:

Nombre: _____

Dirección: _____

Ciudad/Estado/Código Postal: _____

Teléfono (Casa): _____

Teléfono (Trabajo): _____

Correo electrónico: _____

¿Requiere un formato accesible? (Seleccione uno o más):

☐ Letra grande

☐ TDD

☐ Cinta de audio

☐ Otro: _____

B. Persona discriminada (si no es el/la denunciante):

Nombre: _____

Dirección: _____

Ciudad/Estado/Código Postal: _____

Teléfono (Casa): _____

Teléfono (Trabajo): _____

Correo electrónico: _____

Relación con la persona por la que presenta la queja: _____

Explique por qué presenta la queja en nombre de un tercero:

Por favor, confirme que ha obtenido el permiso de la persona afectada si presenta la queja en nombre de un tercero.

☐ Sí

☐ No

C. ¿Cuál de las siguientes opciones describe mejor el motivo por el que cree que ocurrió la discriminación?

☐ Raza ☐ Color ☐ Origen nacional

Otro:

D. ¿En qué fecha(s) ocurrió la presunta discriminación?

Fecha: _____

Fecha: _____

Fecha: _____

Fecha: _____

Fecha: _____

Otro:

E. Describa la presunta discriminación. Explique qué ocurrió y a quién considera responsable. Describa a todas las personas involucradas. Incluya el nombre e información de contacto de la(s) persona(s) que lo/la discriminaron (si se conocen) así como los nombres e información de contacto de cualquier testigo. Si necesita espacio adicional, agregue una hoja.

F. ¿Ha presentado esta queja ante alguna agencia federal, estatal o local, o ante algún tribunal federal o estatal? Marque todos los que correspondan:

☐ Agencia federal: _____

☐ Tribunal federal: _____

☐ Agencia estatal: _____

☐ Tribunal estatal: _____

☐ Agencia local: _____

Si marcó alguno, proporcione la información de contacto de la persona encargada en la agencia/tribunal donde se presentó la queja:

Nombre: _____

Título: _____

Dirección: _____

Ciudad/Estado/Código Postal: _____

Teléfono (Casa): _____

Teléfono (Trabajo): _____

Correo electrónico: _____

G. Por favor, firme a continuación. Puede adjuntar cualquier documento u otra información que considere relevante para su queja.

Firma: _____ **Fecha:** _____

Adjuntos: ☐ Sí ☐ No

H. Envíe el formulario y cualquier información adicional a:

Bayonne Economic Opportunity Foundation

555 Kennedy Blvd.

Bayonne, NJ 07002

(Title VI) نموذج شكوى بموجب الباب السادس

ملاحظة: المعلومات التالية مطلوبة للمساعدة في معالجة شكاواك

أ. معلومات مقدم الشكوى

الاسم: _____

العنوان: _____

المدينة/الولاية/الرمز البريدي: _____

رقم الهاتف (المنزل): _____

رقم الهاتف (العمل): _____

البريد الإلكتروني: _____

هل تحتاج إلى تنسيق يسهل الوصول إليه؟ (اختر واحدًا أو أكثر)

☐ طباعة كبيرة

☐ جهاز TDD

☐ شريط صوتي

☐ آخر: _____

ب. الشخص المتعرض للتمييز (إذا لم يكن مقدم الشكوى)

الاسم: _____

العنوان: _____

المدينة/الولاية/الرمز البريدي: _____

رقم الهاتف (المنزل): _____

رقم الهاتف (العمل): _____

البريد الإلكتروني: _____

العلاقة بالشخص الذي تقدم الشكوى نيابة عنه: _____

يرجى شرح سبب تقديمك الشكوى نيابة عن طرف ثالث

يرجى تأكيد حصولك على إذن من الطرف المتضرر إذا كنت تقدم الشكوى نيابة عنه

☐ نعم

☐ لا

ج. ما هو السبب الذي تعتقد أنه أدى إلى التمييز؟ (اختر ما ينطبق)

☐ العرق ☐ اللون ☐ الأصل القومي ☐

أخرى: _____

د. في أي تاريخ (تواريخ) وقع التمييز المزعوم؟

التاريخ: _____

التاريخ: _____

التاريخ: _____

التاريخ: _____

التاريخ: _____

أخرى: _____

هـ. يرجى وصف التمييز المزعوم. اشرح ما حدث ومن تعتقد أنه المسؤول. وصف جميع الأشخاص المتورطين، بما في ذلك أسماء ومعلومات الاتصال للأشخاص الذين قاموا بالتمييز ضدك (إن وجدوا) وكذلك الشهود. إذا احتجت مساحة إضافية، أضف ورقة منفصلة.

و. هل قدمت هذه الشكوى إلى أي جهة فدرالية أو محلية أو حكومية، أو إلى أي محكمة؟ (يرجى وضع علامة على جميع ما ينطبق)

☐ جهة فدرالية: _____

☐ محكمة فدرالية: _____

☐ جهة حكومية: _____

☐ محكمة حكومية: _____

☐ جهة محلية: _____

إذا أجبت بنعم، يرجى تقديم معلومات جهة الاتصال في الجهة/المحكمة

الاسم: _____

الوظيفة: _____

العنوان: _____

المدينة/الولاية/الرمز البريدي: _____

رقم الهاتف (المنزل): _____

رقم الهاتف (العمل): _____

البريد الإلكتروني: _____

ز. يرجى التوقيع أدناه. يمكنك إرفاق أي مستندات أو معلومات إضافية تراها ذات صلة بشكواك

التوقيع: _____ التاريخ: _____

مرفقات: ☐ نعم ☐ لا

ح. إرسال النموذج وأي معلومات إضافية إلى

Bayonne Economic Opportunity Foundation

555 Kennedy Blvd.

Bayonne, NJ 07002

Table of Transit-Related Title VI Investigations, Complaints, and Lawsuits

All subrecipients shall 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 subrecipient.

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 recipient in response, or final findings related to the investigation, lawsuit, or complaint.

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

Public Participation Plan

Bayonne Economic Opportunity Foundation 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.

Bayonne Economic Opportunity Foundation 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

Bayonne Economic Opportunity Foundation publishes notices, brochures and tables regarding Bayonne Economic Opportunity Foundation'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:

- Press releases to local and state media
- E-mail blasts and alerts via text or e-mail
- Website links and articles
- On bus advertising, exterior bus banners, onboard enunciator, and TV monitors on partial bus fleet
- 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
- Newspaper ads considering stations and publications that serve LEP and minority populations

Meeting Locations

Bayonne Economic Opportunity Foundation 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 Bayonne Economic Opportunity Foundation 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, Bayonne Economic Opportunity Foundation conducts public meetings that utilize one-on-one interviews with customers. Bayonne Economic Opportunity Foundation's 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. Bayonne Economic Opportunity Foundation 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 Bayonne Economic Opportunity Foundation'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

Bayonne Economic Opportunity Foundation'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. Bayonne Economic Opportunity Foundation 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 Bayonne Economic Opportunity Foundation's Customer Advocacy Group, which reports directly to the Bayonne Economic Opportunity Foundation Management staff. This council is representative of both minority and non-minority groups.

Community Events

Bayonne Economic Opportunity Foundation's 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. Bayonne Economic Opportunity Foundation staffers man a display booth and provide information on public transit activities and review customer feedback.

Information Tables

When Bayonne Economic Opportunity Foundation wants to advise the public of specific projects that will have a direct impact on riders, Bayonne Economic Opportunity Foundation 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

Bayonne Economic Opportunity Foundation 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. Bayonne Economic Opportunity Foundation has staff members that will assist LEP persons.

Jurisdictional Meetings

Bayonne Economic Opportunity Foundation conducts an extensive outreach program with jurisdictions throughout its service area. Quarterly meetings are conducted to gather meaningful feedback on current transit needs issues, offer information about the services Bayonne Economic Opportunity Foundation provides, and enhance relationships with our stakeholders.

The Federal Transit Administration (FTA) requires that the Title VI program include a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations. The plan may include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others. Applicants to New Jersey Transit for FTA assistance are required to comply with several requirements that help meet this Title VI requirement. These requirements include the published notice of intent to apply to New Jersey Transit for FTA assistance and participation in the public transit-human services transportation coordinated plan development. Other public participation methods include open Board/ council meetings, council meetings of cities and counties that provide local funding, advisory committees, public involvement efforts for transportation services, passenger surveys, marketing efforts, such as booths at fairs, and presentations to service and other organizations.

Describe your agency's participation in the following list of items to explain your public participation element.

- BEOF holds an annual public meeting.
- The annual public meeting is advertised through our Facebook page, the City of Bayonne's website, and local advertisement.
- BEOF Board Meetings are held via Zoom
- Is the location accessible to persons with disabilities? : Yes
- Is the location served by your agency's transportation services during the hours Board/council meetings are held? If yes, please describe. If not, do you offer transportation to the meetings upon request? Board meetings are held off hours, if transportation is needed accommodations can be made.
- What other efforts do you undertake to ensure that transportation riders or clients can attend Board/council meetings? Through our public notice we let clients know that transportation can be provided.
- The annual public meeting is held through Zoom.
- BEOF relies on the City of Bayonne, as well as the NJ Department of Community Affairs to fund our transportation services.

Language Assistance Plan

Bayonne Economic Opportunity Foundation

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

The Bayonne Economic Opportunity Foundation is responsible for the management of the County's Bayonne Economic Opportunity Foundation local bus service, Bayonne Economic Opportunity Foundation commuter bus service and Bayonne Economic Opportunity Foundation paratransit 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. The sub-recipients include the **service area** for the Bayonne Economic Opportunity Foundation service, Bayonne Economic Opportunity Foundation (a private/nonprofit company providing public bus service) and Bayonne Economic Opportunity Foundation (a private company providing public bus service). This Language Assistance Plan (LAP) applies to the Bayonne Economic Opportunity Foundation services in Bayonne, NJ 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 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 Bayonne Economic Opportunity Foundation uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps Bayonne Economic Opportunity Foundation communicate effectively with persons with LEP or low-literacy. The Four Factor Analysis considers the following components:

- The number or portion of LEP persons eligible to be served or likely to be encountered by Bayonne Economic Opportunity Foundation
- The frequency with which LEP persons come into contact with Bayonne Economic Opportunity Foundation
- The nature and importance of Bayonne Economic Opportunity Foundation activities, programs and services to people's lives.
- 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 Bayonne Economic Opportunity Foundation

The Bayonne Economic Opportunity Foundation system serves Bayonne, NJ.

American Community Survey 5-Year Estimates from <see Census Bureau data and indicate year> reveal that at the county level, while there are numerous languages spoken at home, there are <indicate the # of LEP languages identified via Census Bureau> languages spoken where more than 1,000 people speak English less than very well. The (#) languages are included in the following table.

Table 1: Languages at the County Level

Source: American Community Survey, (1)-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”. This definition artificially inflates all of the LEP persons total, including raising the number of Chinese and Russian LEP persons above the 1,000 person threshold.

Sample Languages Spoken	Number that speak English less than very well (estimated)	Percentage that speak English less than very well
Spanish	5,539	8.08%
Arabic	2,120	3.20%

*Other Asian Languages is not a specific language, but instead a group of languages with no detail regarding the number of LEP persons for each language included, so it does not require any specific consideration in relation to the Safe Harbor Provision.

Geographic Distribution of Total Population with Limited English Proficiency

At the time of the 2012 American Community Survey, **BEOF** had a total population of 312,011, of whom 288,297 were individuals age 5 years and older. Of this population, 63.2 percent speak only English, while the remaining 36.8 percent speak other languages, either in addition to or instead of English. In **BEOF**, 7.9 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.

BEOF contains 65 census tracts, of which 21 contain LEP populations above the county average. These 21 tracts contained 18,499 LEP residents in 2012, or 80.3 percent of the county’s LEP residents. The 21 census tracts containing LEP populations above the county average are located in three areas.

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

Much like the State overall, the largest share of the LEP population in **BEOF** speaks Spanish as their primary language. Statewide, 56.3 percent of the LEP population ages five (5) and older are Spanish-speaking. In **BEOF**, 45.5 percent of the LEP population ages five (5) and older speak Spanish as their primary language. This group represents 3.6 percent of the county’s total population ages five (5) and older.

Spanish

With the exception of census tracts located in Bayonne, all of the high-LEP census tracts contain a higher percentage of Spanish-speaking LEP persons than the county average. The greatest concentrations of Spanish-speaking LEP persons in the county (over 10 percent of the total population ages five (5) and older), are concentrated. The census tracts in the central part of **Bayonne** contain the highest concentration of Spanish-speaking LEP persons in the **BEOF** service area. Between 24 and 32 percent of the total population ages five (5) and older in those tracts are LEP and Spanish-speaking. Spanish-speakers compose 88.1 percent of the LEP population in the area of **Bayonne**. Spanish speakers make up more than 60 percent of the LEP population in Bayonne, with census tracts ranging as high as 84.3 percent.

Other Languages

LEP persons who speak Indo-European languages other than English or Spanish are heavily concentrated in the **Bayonne**. In the census tracts that make up these communities, LEP persons who speak “other Indo-European” languages range from 66.5 to 98.5 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 ____ and ____, the most frequently spoken Indo-European language is French Creole, spoken by many immigrants who originated in Haiti. In ____, the most frequently spoken Indo-European language is Yiddish, due to the large populations of Orthodox and Hasidic Jews in those communities. Russian, German, Polish and Urdu are other commonly spoken languages in those communities.

LEP persons who speak Asian and Pacific Island languages make up a large share of the LEP population in ____ **CDP** (10.3 percent), many of whom speak Tagalog and Vietnamese. In addition,

there are significant numbers of LEP persons who speak Asian and Pacific Island languages who do not live in high-LEP census tracts. More than 70 LEP persons who speak these languages are located in seven other census tracts: Census Tract 18.04 in the **New CDP** area, Census Tracts 11.02, 12, and 14.03 in **Other City**, and Census Tracts 25.02 and 12 in _____.

The primary concentrations of LEP persons who speak languages other than Spanish, Yiddish, French Creole, Russian, or Asian and Pacific Island languages are located in _____. Many of the residents in these areas speak Hebrew at home.

Factor #2: Frequency of Use by the Limited English Proficient Populations

Individuals with limited English proficiency inquire about use and are affected by service that **BEOF** 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 **BEOF** by calling the customer service telephone line, visiting the facility, and using the website. A significant part of the development of the **BEOF**'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
- ◆ Reduced Bus Fare card and **BEOF** Paratransit card sales
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public meetings and events
- ◆ Paratransit reservation agents
- ◆ Local news advertising (print)
- ◆ Service-related posters at **BEOF** bus stops

Employee Survey

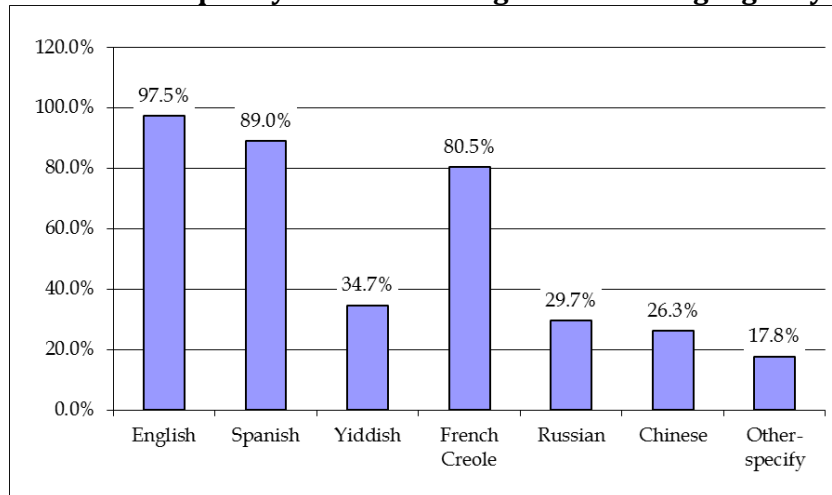
In August 2014, to better understand the frequency with which LEP riders come into contact with **BEOF** services, **BEOF** conducted internal surveys of customer service staff, reservation agents, administrative staff, and fixed route, paratransit and commuter bus drivers. The survey tool was aimed at determining what language skills already exist among **BEOF** 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. **BEOF** distributed a language survey to its employees and to the employees of its vendor, Transport Corp. A total of 121 surveys were completed. Of the 121 respondents 29 were **BEOF**, administrative staff or supervisors, 26 were **BEOF** drivers, and 66 were Transport Corp. bus drivers. The results of the employee survey effort are described below. A copy of the survey instrument is provided in Appendix C-4.

Half of the survey respondents stated that they encounter non-English speaking passengers "often." Another 38 percent of respondents stated that they "sometimes" encounter non-English speakers. The remaining 12 percent of survey respondents "rarely" or "never" encounter non-English speaking passengers.

The languages most often encountered by **BEOF** 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). One hundred and fifteen employees (or 97.5 percent of responses) stated that they come into contact with the English language most often. After the English language, Spanish and French Creole were the most common languages. Yiddish was the fourth most commonly encountered language (34.7 percent).

Exhibit 1: Frequency of Encountering Different Languages by Employees of BEOF

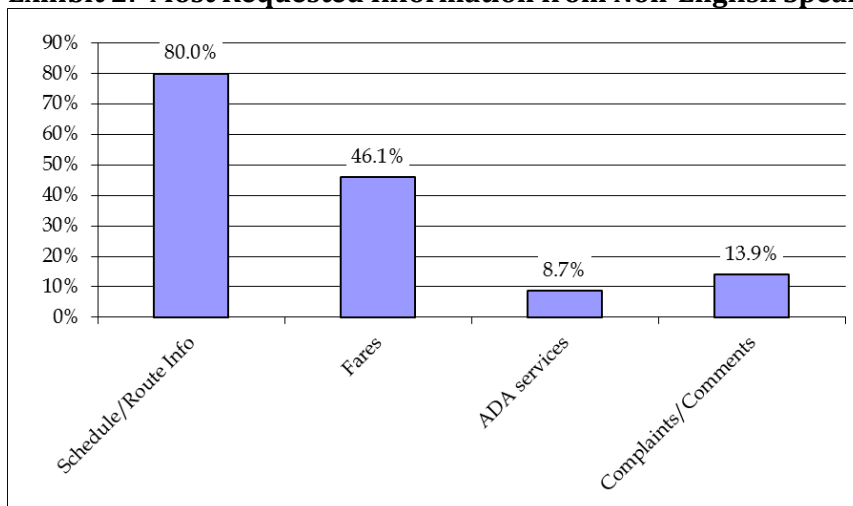


“Deaf” was the only response specified in the “Other” languages category. Approximately 98 percent of respondents who indicated “other” did not list the other language to which they were referring.

Approximately 48 percent of employee survey respondents indicated that they “very effectively” communicate with non-English speakers. Another 26 percent stated that they were “moderately effective” at communicating with non-English speakers. Twenty-two (22) percent were “less effective” at communicating. The remaining four percent were “unable” to communicate.

The most commonly requested information from non-English speakers was schedule and route information (80 percent). The following exhibit outlines the information that is most commonly requested.

Exhibit 2: Most Requested Information from Non-English Speakers



Most interactions between the **BEOF** and its vendor's employees with passengers with Limited English Proficiency (LEP) are face-to-face (92 percent). Another 25 percent of respondents also interact with passengers over the phone. Approximately 16 percent of respondents correspond by email with passengers.

The routes with interactions with passengers with Limited English Proficiency (LEP) were listed as follows (in order of frequency): 59, 91, 93, 94, 92, and 97.

Community Partner Survey

In August 2014, as part of this assessment, **BEOF** also canvassed its six community partners to assess the extent to which they come into contact with LEP populations. Community partners are those who are either directly or indirectly affected by the plan, or recommendations of the plan. The community partners included the County Department of Social Services (DSS), the County Office for the Aging, Foster Program, the Independent Living Center and the Association for the Visually Impaired. The **BEOF** has regular communication with these agencies. **BEOF** asked the partner agencies to respond to a brief list of questions to estimate the percent of clients they interact with who have Limited English Proficiency. A summary of responses is provided below. Individual answers from the partner agencies are provided in the following table.

- 1) Do you encounter non-English speaking/reading people who need your services? No
- 2) If so, what are the top three languages that you encounter?
- 3) How do you address language barriers? We have staff that speak multiple languages.
- 4) Do you find language to be a barrier in preventing you from providing service? No

Table 2: Community Partner Survey Results

Community Partner	Do you encounter non-English speaking/reading people?	Top three languages that you encounter?	How do you address language barriers?	Do you find language to be a barrier in preventing you from providing service?
County Department of Social Services	Yes	Spanish, Haitian Creole, Yiddish	DSS maintains a directory of multi-lingual staff and the languages spoken. Workers within a given unit are often identified and assigned according to language skills. Printed materials available in multiple languages. The DSS also maintains a list of interpreters that is available to the BEOF and other county agencies. DSS maintains linkages with community-based partner organizations, which have a deeper knowledge of linguistic and cultural	Language is an ongoing challenge, but not a barrier.
County Office for the Aging	Yes	Spanish, French Creole	Bilingual staff and working with family members.	No.

Rider Input

In 2011 and 2012, **BEOF** conducted a passenger origin-destination survey. The survey asked passengers detailed questions about the **BEOF** service. It also asked passengers to indicate their proficiency with the English language and what language they primarily speak at home.

According to the survey results, the majority of passengers for whom English was not their primary language spoke Spanish. In 2011, 16 percent (or 107 out of 651) of the survey respondents spoke Spanish as their primary language at home and spoke English not well or not at all. In 2012, Spanish remained the most common language other than English spoken by **BEOF** passengers. Ten percent (or 69 out of 663) of the survey respondents who spoke Spanish as their primary language, spoke English not well or not at all.

Exhibit 3: <AGENCY NAME> Passengers Who Speak English Not Well or Not at All, 2011 and 2012

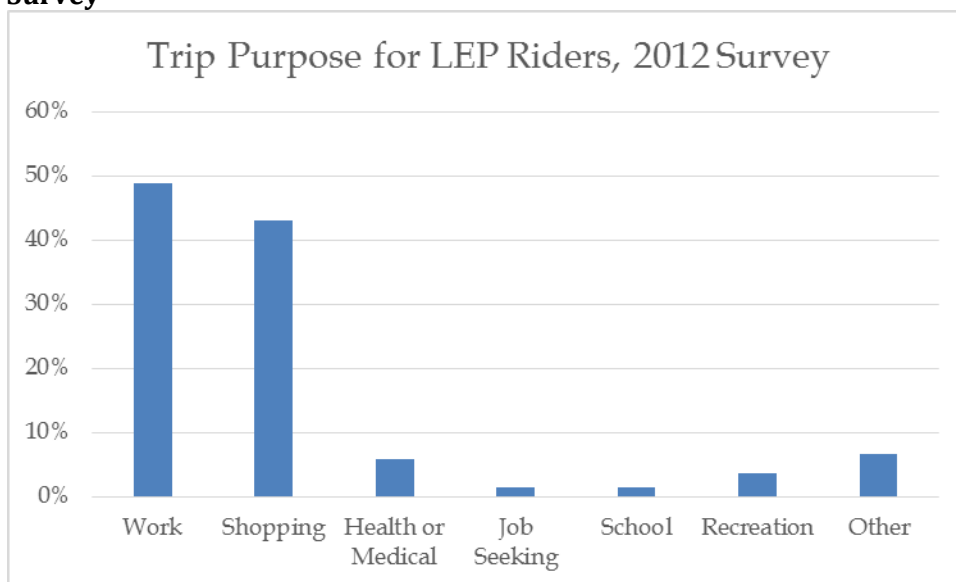
Primary Language	2011 Survey English Ability Not Well or Not at All		2012 Survey English Ability Not Well or Not at All	
Total Completed Surveys				

Source: <AGENCY NAME> Passenger Surveys 2011 and 2012

Factor #3: Importance of BEOF to People's Lives

Access to the services provided by **BEOF** is critical to the lives of many who depend on **BEOF** for access to jobs and essential services. The 2011-2012 passenger survey asked riders "what is the main purpose of your trip today?" Nearly 50 percent (49.4%) of LEP riders responding to the question indicated that they were riding for the purpose of work; 43% were shopping; 6% were going to medical appointments; 4% were riding for a recreational trip; and, 1% were riding to or from school.

Exhibit 4: (SAMPLE) Trip Purpose for Riders with Limited English Proficiency, 2012 Survey



BEOF understands that if Limited English Proficiency or low-literacy is a barrier to using **BEOF** services, then the consequences for the individual could limit a person's access to obtain necessary medical care, employment or education. Vital information that can affect a person's access to **BEOF** services includes the following:

Types of Vital Information

- ◆ Route and schedule information
- ◆ Fare and payment information
- ◆ Service Announcements
- ◆ Safety and security announcements
- ◆ Complaint and comment forms

Providing Language Assistance for Relevant Programs, Activities and Services

The **BEOF** utilizes the services of an in-house Transportation Assistant who is fluent in Spanish. The Transportation Assistant provides rider information in Spanish at the **BEOF** telephone information line, and translates all informational flyers, notices, and other information for the **BEOF**. This information is posted at major bus stops and on all buses. The **BEOF** also sought the input of the French Creole speaking populations in the central part of the county during the course of the 2007 County Transportation Studies. On-board passenger origin-destination surveys in 2011-2012 were conducted on **BEOF** Route 59 and prepared in English, Spanish, French and French Creole. This was done to ensure that speakers of many different languages could offer meaningful insight to benefit the study.

The County DSS maintains a list of names and telephone numbers of thirty-six (36) County employees who can interpret eleven (11) different languages. In August 2014, the Commissioner of Social Services granted permission to the **BEOF** to utilize this list for language assistance to customers of the **BEOF** (Appendix C-3). The list is organized by language spoken so that DSS and **BEOF** employees may quickly reference speakers of a certain language when necessary, and can direct telephone calls and other forms of customer correspondence to county employees who can communicate with and assist residents.

For items in a word-processed format, Google Translate is provided for all languages on the **BEOF** website www.beof.com.

Informational presentations involving access to public transportation for the LEP populations have been conducted to inform agencies on services available to their target populations, which include the LEP populations. The **BEOF** will conduct public and individual interaction with agencies and the ridership directly to determine LEP needs. The **BEOF** will ensure outreach communications are in languages that meet LEP thresholds and that interpreters are available for presentations. The **BEOF** will advertise in newspapers that are widely read by the LEP organizations that we are trying to reach and work with nonprofits of a given LEP group.

Training <AGENCY NAME> Staff

The **BEOF** staff at all levels are aware of the need to reach out and provide information to LEP persons who rely on the transit services the **BEOF** manages. In order to ensure that new staff members understand this need, supplemental training will be provided as part of the **BEOF** 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 section of the **BEOF** or to the operator of the transit service. All of the individuals in these groups will be made aware of the regularly updated Department of Social Services Interpreters List and services. **BEOF** staff and the operator of the **BEOF** 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.

Additional recommended language re: Staff Training:

Samples of training that will be provided for staff include:

- Information on the Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Documentation of language assistance requests
- How to identify/handle a potential Title VI/LEP complaint

The agency will keep a log of all staff training completed along with copies of the following on file:

- Sign-in sheets
- Agendas

Providing Notice to Limited English Proficient Persons

As a matter of policy, all vital documents related to **BEOF** services are printed in English and Spanish. Service changes brochures and flyers, which advertise service adjustments and emergency information are also printed in both English and Spanish. On-board signage, advertising of **BEOF**'s discount program and legal signage are also printed in English and Spanish. All planning activities and notices that are advertised to the press are shared with news sources that serve a variety of **BEOF** LEP communities.

The **BEOF** planning program adheres to the Public Involvement Plan (PIP) as adopted by the **Metropolitan Planning Organization (MPO)**, on September 22, 2014. **MPO's** PIP made the following commitment:

To better achieve its outreach efforts, MPO has developed five desired goals for its public involvement activities:

- 1. Educate the public about the transportation planning process and how they can get involved;*
- 2. Engage the public and all stakeholders through timely notice of meetings and events and increased opportunities to provide input;*
- 3. Enhance outreach tools and techniques to engage the many diverse regional constituencies;*
- 4. Ensure that public participation methods, mechanisms and opportunities are clearly defined and accessible; and*
- 5. Effectively involve the community, including those who have been traditionally underserved and underrepresented in the planning process.*

MPO's public involvement efforts strive to bring varied stakeholders into the process – in dynamic and significant ways – and enhance the level of collaboration and meaningful input.

While **BEOF** has the greatest capabilities to assist LEP persons who speak Spanish, there may be instances when activities will necessitate the provision of information and notices in languages other than English or Spanish. For example, if activities conducted affect a community in which there is a large population of LEP individuals who speak other Indo-European languages or Asian languages, **BEOF** may rely on other county resources for translation services.

Additional recommended language re: LEP Outreach:

BEOF will keep a log of all LEP outreach activities including copies of translations of service changes, brochures, and flyers.

Outcomes - Monitoring, Evaluating and Updating the Plan

The **BEOF** conducts periodic ridership, origin-destination and marketing surveys. In 2011 and 2012 a ridership survey was conducted on-board **BEOF** buses in English and Spanish. The **BEOF** 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, **BEOF** will develop a committee to evaluate all information received from surveys, focus group meetings, outreach efforts, staff contact and trainings. The committee will review the plan annually for updates as needed, while also developing new concepts for implementation in the next plan. The committee will monitor the following statistics, at minimum:

- ◆ Statistics kept on LEP contacts
- ◆ Annual review of local Census data
- ◆ Ongoing collaboration with community partners
- ◆ Effectiveness and usage of written translated documents
- ◆ Assessment of the Civil Rights Act Title VI Program

Factor #4: Resources and Costs for LEP Outreach

The **BEOF** 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 **BEOF**'s marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, the **BEOF** 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 **BEOF** has established a near-term goal to include the translation of vital documents into French Creole and Yiddish, based on available resources and funding for such activities. The **BEOF** will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.

Table Depicting Minority Representation on Decision-Making Bodies

The Bayonne Economic Opportunity Foundation does not have a decision-making body. All decisions are reviewed and approved by Anthony Segarra, Executive Director.

