



**Federal Transit  
Authority  
Title VI PROGRAM - Plan**

The Arc of Union County  
70 Diamond Road  
Springfield, NJ 07081  
[www.arcunion.org](http://www.arcunion.org)

The Arc of Union County  
ATTN: Joseph Kamara  
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70 Diamond Road  
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## **NOTICE TO BENEFICIARIES OF PROTECTION UNDER TITLE VI**

The Arc of Union County, Springfield NJ provides this notice as information to the public regarding the Agency's obligations under the FTA's Title VI regulations and the protections against discrimination afforded to the public by Title VI.

### **The Arc of Union County Anti-Discrimination Policy**

"The Arc of Union County believes that equal opportunity is important for the continuing success of our organization. In accordance with applicable federal, state and municipal laws, The Arc of Union County does not discriminate based on race, disability, color, religion, gender, age sexual orientation, national origin, veteran status or any other protected classification. This policy applies to all activities of The Arc of Union County including employment, Board membership, volunteers and consultants."

In accordance with Title VI, which states that "no person shall, on the grounds 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 Arc of Union County has developed the following Title VI procedure and forms for use by any person who believes that he/she has been aggrieved by any unlawful discriminatory practice under Title VI. Complaints may be filed in writing to:

The Arc of Union County  
70 Diamond Road  
Springfield, NJ 07081  
Attn: Director, Fleet Management  
[Jkamara@arcunion.org](mailto:Jkamara@arcunion.org)

The Title VI notice and all associated forms can be found on The Arc of Union County website at: [www.arcunion.org](http://www.arcunion.org), filed in any NJ Transit vehicle log book, at each Day program and Residential program filed in the manager's office and posted on the main office bulletin board in the kitchen at 70 Diamond Road, Springfield NJ 07081.

Transportation services provided by this agency are in part funded through federal funds received through NJ TRANSIT and as an individual you also have the right to file your complaint under Title VI to the FTA by writing to: Title VI Program Coordinator, East Building, 5th Floor – TCR, U.S.

Department of Transportation, Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, DC 20590. If information is needed in another language, please contact (973) 315-0000.

\*Si necesita información en otro idioma, comuníquese al (973) 315-0000.

\* Si yo bezwen information nan yon lòt lang , tanpri kontakte (973) 315-0000.

## COMPLAINT PROCEDURE UNDER TITLE VI

The Arc of Union County (“the Agency”) is committed to ensuring that no person is excluded from or denied the benefits of its transit services based on race, color, or national origin as protected by the Title VI of the Civil Rights Act of 1964, as amended. No person or group of people shall be discriminated against with regards to the routing, scheduling, or quality of transportation service based on race, color, or national origin.

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended, by the Agency may file a Title VI complaint by completing and submitting the Agency’s Title VI Complaint Form to: The Arc of Union County, ATTN: Joseph Kamara, Director, Fleet Management, 70 Diamond Road, Springfield, NJ 07081. The Agency investigates complaints received no more than 180 days after the alleged incident. The Agency will process complaints that are complete.

Once the Agency receives the written Complaint Form, the Agency will review it to determine if it has jurisdiction. If the Agency has jurisdiction, the complainant will receive an acknowledgement letter accepting the written complaint and assigning an Agency investigator. The Agency allows 30 working days to complete the investigation of a complaint provided all relevant and required documentation is received from the complainant. If additional time is needed to resolve the case, the assigned investigator will advise the complainant in writing of the additional time needed. If more information is needed to resolve the case, the assigned investigator will contact the complainant directly.

The investigator will send a formal letter requesting additional information and will make at least (2) follow-up attempts to contact the complainant for the additional information using the contact information provided. The complainant has 10 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 10 business days, the Agency can administratively close the case. The case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint and it is determined to meet the criteria for investigation, an investigation is performed. Once complete, the investigator 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 explains that after careful review and consideration of the facts and interviews of witnesses (where applicable), there is no evidence that a violation of Title VI occurred, and the case has been closed. A LOF summarizes the allegations and the interviews regarding the alleged incident and indicates a violation of

Title VI and Agency policy has occurred. The letter also explains whether any disciplinary action, additional training of the staff members or other action will occur. If the complainant wishes to appeal the decision, he or she has 10 calendar days from the date of the letter to do so by submitting an appeal in writing to: The Arc of Union County, ATTN: Joseph Kamara, Director, Fleet Management at 70 Diamond Road, Springfield, NJ 07081. The complainant shall indicate the reason for the appeal. Upon receipt of the appeal, the Agency has 30 business days to complete an additional review, including gathering any additional information (if applicable). Once the review is complete, the administrator will issue the complainant a closure letter or an LOF in response to the appeal. This letter will serve as the Agency's final decision on the matter.

A person may also file a complaint directly with the Federal Transit Administration at:

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

If information is needed in another language, please contact (973) 315-0000.

\*Si necesita información en otro idioma, comuníquese al (973) 315-0000.

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## COMPLAINT FORM UNDER TITLE VI

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### A. Complainant's Information

Name: \_\_\_\_\_

Address: \_\_\_\_ City, State, and Zip Code: \_\_\_\_ Home Telephone: \_\_\_\_

Work Telephone: \_\_\_\_ Cell Phone: \_\_\_\_

Email Address: \_\_\_\_\_

**Accessible Format Requirements?** (Select one or more) ☐ Large print ☐ TDD ☐ Audio tape ☐ Other

### B. Person Discriminated Against (if different than complainant above)

Name: \_\_\_\_\_ Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_ Home Telephone: \_\_\_\_

Cell Phone: \_\_\_\_\_

Email Address: \_\_\_\_\_

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

Please explain why you are filing on behalf of the person identified in section B :

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

Please explain why you are filing on behalf of the person identified in section B :

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Please confirm 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 discrimination take place?**

☐ Date: \_\_\_\_\_

☐ Date: \_\_\_\_\_

**E. Please describe the alleged discrimination. Explain what happened and whom you believe was responsible. Describe all the people who were involved and or include the name and contact information of the person(s) who discriminated against you (if known), as well as the names and contact information of any witnesses. If additional space is needed, please 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? Please Check and or list all that apply.**

Federal agency: \_\_\_\_\_ Federal court: \_\_\_\_\_ State agency: \_\_\_\_\_

State court:

Local agency:

Other:

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

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

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: \_\_\_\_\_

**Submit form and any additional information you feel is relevant to your inquiry or complaint to:**

The Arc of Union County  
ATTN: Joseph Kamara  
Director, Fleet Management  
70 Diamond Road  
Springfield, NJ 07081  
[jkamara@arcunion.org](mailto:jkamara@arcunion.org)



## RECORDED TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS

The Arc of Union County maintains a list of alleged discrimination on the basis of race, color or national origin as part of the DOT's Title VI regulations. The list includes Active investigations conducted by FTA (Federal Transit Administration) and entities other than FTA; Lawsuits; and or Complaints naming The Arc of Union County

	Date	Summary (include basis on complaint: race, color or national origin)	Status	Action(s) Taken
<b>Investigations:</b>				
1.	NONE REPORTED/RECORDED			
2.				
3.				
4.				
5.				
<b>Lawsuits:</b>				
1.	NONE REPORTED/RECORDED			
2.				
3.				
4.				
5.				
<b>Complaints:</b>				
1.	NONE REPORTED/RECORDED			
2.				
3.				
4.				
5.				

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

The Arc of Union County transportation program currently serves individuals with intellectual and developmental disabilities in Union County. Transportation supported by the NJ Transit for FTA assistance is provided to individuals serviced through The Arc of Union County Day and Residential programs, respite services, and individuals within the county with self-directed service supports. The Arc of Union County 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 direction on obtaining this information is made available on the agency's website at [www.arcunion.org](http://www.arcunion.org)

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

The Arc of Union County publishes notices, brochures and/or newsletters regarding the agency's program and transportation related services. This information is available to eligible service recipients as well as caregivers. Public notice methods include but is not limited to: Agency Newsletters, Agency Brochures, Community Events, Notices in Vehicles, Public Events, Website/social media and E-Mail Blasts, and is made available in English, Spanish and Haitian upon request.



### Meeting Locations:

As an ADA compliant and CARF accredited agency, all public meetings held at The Arc of Union County service 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 individual designated as part of their support team, is invited to attend and are welcome at these meetings.
- The agency supports Self-Advocacy meetings. The meetings are open to all individuals receiving services and the employees of The Arc of Union County. 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 of Union County representative attends many Union County transportation and NJ Transit public hearings annually as possible. Feedback from the Union County and stakeholder surveys is shared at these meetings.

Any member of the 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 of Union County main office at 70 Diamond Road, Springfield NJ, 07081, or by calling (973) 315-0000.



#### Direct Contact:

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

Each service recipient is provided with all necessary 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, Haitian and or large print upon request.

#### Website/Social Media:

The Arc of Union County 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 for public view and access.

#### Community Events/Information Tables:

The Arc of Union County participates in various community information events throughout the year such as provider fairs. Information concerning The Arc of Union County program and transportation services is provided at these events. Individuals who have questions or concerns about available services are encouraged to have direct consultation with the appropriate administrator in charge of the program. Also, information is displayed throughout the reception area of our headquarters as well as our program and group home locations.



## THE ARC OF UNION COUNTY LANGUAGE ASSISTANCE PLAN (LAP)

The Arc of Union County is a not-for-profit agency providing residential, day program services and transportation services to individuals with intellectual and developmental disabilities. The Arc of Union County 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 from The Arc of Union County. Transportation is provided to and from employment and day programs, as well as to and from community inclusion activities. Transportation services are provided throughout Union County and into bordering counties. Once referred to and admitted to the agency, all individuals, including those who may be LEP, are under the supervision of trained professional staff, and provide 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 of Union County uses information obtained in the Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps The Arc of Union County to communicate effectively with people 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 to and/or encountered by The Arc of Union County.
- Frequency with which LEP people encounter The Arc of Union County.
- Nature and importance of activities, programs, and services to our community and 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 of Union County.

Factor 1: Description of the (LEP), Limited English Proficient Population Served. The Arc of Union County provides services to eligible individuals throughout Union County. For this document, the study is based on all individuals served in this area. Research and census data analysis of Union County, New Jersey indicates 28.71% of the total population is limited English speaking of which 17.30% speak Spanish, and 11.41% speak other languages. It has been the experience of The Arc of Union County 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 of Union County serves approximately 350 individuals through our programs, services and transportation on an annual basis. The following table is representative of the languages of those individuals within the population of the county served by the agency.

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

**SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES  
2024 United States Census Bureau**

Household Language	Union County, New Jersey		Union Twp., New Jersey	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Total:	8,772,313	±1,190	57,537	±383
English only	5,851,494	±32,509	30,369	±1,605
Spanish:	1,517,618	±20,428	9,251	±968
Limited English-speaking household	731,151	±16,716	3,421	±418
Not a limited English-speaking household	786,467	±16,990	5,830	±904
Continued:				
Other languages:	938,886	±63,103	14,079	±3,461
Limited English-speaking household	297,286	±33,611	7,325	±1,344
Not a limited English-speaking household	641,600	±33,323	6,844	±1,841



**Source:** American Community Survey 2023 – 5-Year Estimates

<https://api.census.gov/data/2023/acs/acs5>

<b>Sample Languages Spoken</b>	<b>Number that speak English less than very well (estimated)</b>	<b>Percentage that speak English less than very well</b>
Spanish	3,421	6%
French, Haitian, or Cajun	1,218	2%
Other Indo-European	2,133	4%

Factor 2: Frequency of Use by the (LEP) Limited English Proficient Population:

Individuals with limited English proficiency inquire about, use and are affected by services offered by The Arc of Union County programs, and the transportation provided on a regular basis. Individuals with limited English proficiency encounter the agency through their case manager, support coordinator, caregiver, or guardian. A significant part of the development of The Arc of Union County Language Assistance Plan is the ability to receive and vet inquiries into agency programs and services to include transportation sources of major points of contact, which include the following: Annual Participant Family Surveys, Case Management Inquiries, Internal Management Inquiries, Caregiver Inquiries, Daily Communication with Agency Program, Residential Services & Fleet Management, Support Coordinator Inquiries, and Community Outreach.

To better understand the frequency with which LEP service recipients encounter the Arc of Union County, an informal survey is facilitated each year by our agency Quality Department and was last conducted in the year of 2024 with program managers and supervisors. Survey results indicate out of our adult population of 350 service recipients there are 75 individuals who are non-verbal or need communications services due to their disability.

Factor 3: Nature and importance of activities, programs, and services to our community and people's lives.

The importance of the Arc of Union Transportation Services to our individuals served is immeasurable. Access to services provided by The Arc of Union County is critical to support the lives of those with intellectual and developmental disabilities who depend on our transportation services to access life-skills building, workforce development & employment, training opportunities, learning, community integration, and recreational opportunities. Our agency services recipients of these programs and services are 91% reliant on The Arc of Union County's set fixed route services. There is an estimated <9% of individuals receiving services utilize private transportation for Supported Employment services.



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

The Arc of Union County currently serves Limited English Proficient persons directly related to their disability. Personnel and staff are employed and/or trained to interpret needs specific to everyone's unique 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.

#### Agency Training

Title VI compliance training is included as part of all pre-service and in-service training. Additional training is provided on a case-by-case basis when a new LEP individual enters a program. Compliance is reviewed and updated routinely throughout the year during programming meetings as well as the individual's annual meeting. The Arc of Union County employs approximately 12 individuals who are bilingual. Individuals proficient in sign language are hired as/when needed.

The following training will be provided to the Arc of Union staff:

- 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 handle a potential Title VI complaint

The Arc of Union County will keep a log of all Title VI related staff training along with copies of the following:

- Sign-in sheets
- Agendas
- Certificates of completion (or other document indicating completion of training)

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

Vital documents, including but not limited to, program and transportation information is available in large print and/or Spanish and Haitian. Personal meetings with appropriate staff, including the staff, are scheduled timely upon request and or as deemed or necessary for optimal communication.

The Arc of Union County will keep a log of all LEP outreach activities. The Arc of Union County will also keep copies and translations of any LEP outreach activities provided.





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

As part of the agency's Quality, Compliance tasks and agenda, The Arc of Union County 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.

#### Factor 4: Resources and Cost for LEP Outreach:

The Arc of Union County is committed to improving access to program and transportation services for LEP service recipients. The Arc of Union County's transportation fleet is committed to providing language assistance to LEP populations who need and receive services provided by the agency's transportation program. The budget for marketing and professional services is evaluated monthly and modified based on reported needs and analysis. All programs are subject to an annual evaluation by the agency's Compliance Committee designed to identify areas in need of improvement, including the Language Assistance Plan.

The chart below details the ethnic composition of Union County, NJ based on US Census Bureau data.

<b>Ethnic Group</b>	<b>New Jersey</b>	<b>Union County</b>
<b>Total:</b>	<b>9,288,994</b>	<b>594,160</b>
Hispanic or Latino	2,002,575	35.3%
Not Hispanic or Latino	7,286,419	1.0%
Population of one race:		
White alone	4,816,381	66.2%
Black or African American alone	1,154,142	24.0%
American Indian and Alaska Native alone	11,206	1.0%
Asian alone	942,921	1.0%
Native Hawaiian and Other Pacific Islander alone	1,944	0.2%
Population of two or more races:	289,471	2.4%
Population of two races:	272,852	%
Population of three races:	14,950	%
Population of four races:	1,449	%
Population of five races:	197	%
Population of six races:	23	%



Arc of Union  
Table Depicting Minority Representation on Decision-Making Bodies

Body	Caucasian	Latino	African American	Asian	Native American	Other (insert race)
Governing Body	20%	4%	70%	6%	%	%
Board of Directors	88%	%	6%	6%	%	%
Other Board/Council	94%	%	6%	%	%	%

In summary, the Four Factor analysis as described herein has enabled the agency to address all identified LEP participants that have been served within our programs to ensure that our services and transportation meet their needs. No participants have been underserved in the past 36 years due to language barriers. The agency informs all program participants and families that language assistance is available and free of charge.

The Arc of Union County Welcomes All Feedback and Inquiries regarding your experience with our agency services and transportation.

Contact our Director of Fleet Management with any questions via mail, or e-mail as follows:

The Arc of Union County  
ATTN: Director, Fleet Management  
70 Diamond Road  
Springfield, NJ 07081  
[jkamara@arcunion.org](mailto:jkamara@arcunion.org)