

**CLIFFSIDE PARK HOUSING AUTHORITY
CLIFFSIDE PARK SENIOR ACTIVITY CENTER**

TITLE IV PROGRAM



**500A Gorge Road
Cliffside Park NJ 07010
201-941-0655
201-941-4038 Fax
Cphousingauthority.com
Joseph Capano, PHM
Executive Director**

Non-Discrimination Policy

Cliffside Park Housing Authority/Senior Activity Center 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 Cliffside Park Housing Authority/Senior Activity Center. To file a complaint, or for more information on Cliffside Park Housing Authority/Senior Activity Center obligations under Title VI write to: Joseph Capano, Executive Director, Cliffside Park Housing Authority/Senior Activity Center 500 A Gorge Road Cliffside Park NJ 07010 or visit (website www.cphousingauthority.com). Transportation services provided by this agency are in whole or part funded through federal funds received through FTA, 1200 New Jersey Avenue, SE, Washington, D.C., 20590.

If information is needed in another language, contact Joseph Capano, Executive Director or Frank Merchand, Director of Operations, Phone 201-941-0655, 500 Gorge Road, Cliffside Park, New Jersey, www.cphousingauthority.com.

Si necesita información en otro idioma, Contacta con 201-941-0655

Notice listed at following locations:

- On all Senior Transport buses
- Cliffside Park Housing Authority Administrative Offices
- Cliffside Park Senior Activity Center Information Board
- Website: cphousingauthority.com

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 Cliffside Park Housing Authority/Cliffside Park Senior Center may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Cliffside Park Housing Authority/Cliffside Park Senior Center 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 10 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. 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 Authority can administratively close the case. A 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 10 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.

Título VI procedimiento

de queja cualquier persona cree que él o ella ha sido discriminado sobre la base de raza, color u origen nacional por Cliffside Park Housing Authority/Cliffside Park Senior Center puede presentar una queja de título VI rellenando y enviando el formulario de denuncia de la Agencia título VI. Formularios de quejas se encuentran en la sala de espera en la oficina de extensión del Cliffside Park Housing Authority/Cliffside Park Senior Center web: cphousingauthority.com.com y todos los vehículos operados por Cliffside Park Housing Authority/Cliffside Park Senior Center Outreach investiga denuncias recibidas a más tardar 180 días después del presunto incidente. La autoridad procesará las denuncias que se completa.

Una vez recibida la queja, el Director lo revisaremos para determinar si nuestra oficina tiene jurisdicción. La organización querellante recibirán una carta de reconocimiento le informa si la denuncia será investigada por nuestra oficina.

El Director tiene 10 días para investigar la denuncia. Si necesita más información para resolver el caso, el Director puede comunicarse con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por la organización querellante o no recibe la información adicional dentro de 7 días hábiles, la autoridad administrativa puede cerrar el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir su caso.

Después el investigador revisa la queja, él emitirá uno de dos letras al demandante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado. Un LOF resume las denuncias y las entrevistas en relación con el incidente y explica si cualquier acción disciplinaria, formación complementaria de los miembros del personal, u otra acción ocurrirá. Si el demandante desea apelar la decisión, ella tiene 10 días después de la fecha de la carta o el LOF para hacerlo.

TITLE VI Complaint Form Section I:

Name:

Address: _____ **Email address:** _____

Telephone (Home): _____ **Telephone (Work):** _____

Accessible Format Requirements? Large Print Audio Tape
 TDD Other

Section II:

Are you filing this complaint on your own behalf? Yes* No

*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of 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

Section III:

I believe the discrimination I experienced was based on (check all that apply):
 Race Color National Origin
 Date of Alleged Discrimination (Month, Day, Year): _____
 Explain as clearly as possible what happened and why you believe you were discriminated against. 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 more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency? Yes No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
 Yes No
 If yes, check all that apply:
 Federal Agency:
 Federal Court State Agency
 State Court Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____ **Title:** _____

Agency: _____

Address: _____ **Telephone:** _____

Section VI

Name of agency complaint is against: _____ **Contact Person:** _____

Title: _____ **Telephone:** _____

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

Signature and date required below

Signature _____ Date _____

Please submit this form in person at the address below, or mail this form to:

Director
Cliffside Park Housing Authority/Senior Center
500 Gorge Road
Cliffside Park, NJ 07010
201-941-0655x101
jcapano@cp-ha.org

Título VI queja forma sección I:			
Nombre:			
Dirección:		Dirección de correo electrónico:	
Teléfono (casa):		Teléfono (trabajo):	
¿Requisitos de formato accesible?	Letra de gran tamaño		Cinta de audio
	TDD	Otros	
Sección II:			
¿Está presentando esta denuncia en su nombre?		Sí *	No
* Si usted respondió "sí" a esta pregunta, vaya a la sección III.			
Si no, por favor suministrar el nombre y la relación de la persona para quien se quejan:			
Por favor explique por qué han presentado por un tercero:			
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero.		Sí	No
Sección III:			
Creo que la discriminación que viví fue basada en (marque todos que aplican): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Fecha de la supuesta discriminación (mes, día, año): ____			
Explicar lo más claramente posible lo que sucedió y por qué usted cree que fueron discriminados. Describir a todas las personas que participaron. Incluir el nombre e información de contacto de la persona que discriminó (si se conoce) así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el dorso de este formulario.			

Sección IV			
¿Previamente se presentó una queja de título VI con esta agencia?		Sí	No
Sección V			
¿Se han presentado esta denuncia con cualquier otro Federal, estado o agencia local o con cualquier Tribunal Federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No			
En caso afirmativo, marque todas las que aplican: <input type="checkbox"/> Agencia Federal:			
<input type="checkbox"/> Tribunal Federal de <input type="checkbox"/> La Agencia Estatal de			
<input type="checkbox"/> Tribunal del estado <input type="checkbox"/> Agencia local de			
Sírvanse facilitar información sobre una persona de contacto en la Agencia/tribunal donde se presentó la queja.			
Nombre:		Título:	
Agencia:			
Dirección:		Teléfono:	
Sección VI			
Nombre de denuncia de la agencia está en contra de:		Persona de contacto:	
Título:		Teléfono:	

Usted puede conectar cualquier material escrito u otra información que crees que es relevante a su queja.

Firma y fecha especificadas a continuación

Firma fecha

Director
Cliffside Park Housing Authority/Senior Center
500 Gorge Road
Cliffside Park, NJ 07010 Tel:201-941-0655x101

O enviar por correo electrónico to:bs.jcapano@cp-ha.org

Cliffside Park Housing Authority/Senior Center

Transit-Related Title VI Investigations, Complaints, and Lawsuits

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
Lawsuits				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
Complaints				
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

Public Participation Plan

Cliffside Park Housing Authority/Senior Activity Center 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.

Cliffside Park Housing Authority/Senior Activity Center 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

Cliffside Park Housing Authority/Senior Activity Center publishes notices, brochures and tables regarding Cliffside Park Housing Authority/Senior Activity Center 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
- Client newsletters (print and e-mail)
- E-mail blasts and alerts via text or e-mail
- Swift Reach Calls
- Website links and articles
- On bus advertising with interior cards, exterior bus banners, onboard enunciator, and TV monitors on partial bus fleet
- Rack cards/"take ones" placed on the bus and racks throughout Center
- Cliffside Park Borough Hall/Library
- Spanish translation services and translated materials including media signs, day pass rack cards, system map information, translation assistance cards, critical notifications and forms such as Title VI notice and application forms
- Website or newspaper ads considering stations and publications that serve LEP and minority populations

Meeting Locations

Cliffside Park Housing Authority/Senior Activity Center 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 Cliffside Park Housing Authority/Senior Activity Center 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, Cliffside Park Housing Authority/Senior Activity Center conducts public meetings that utilize one-on-one interviews with clients. Cliffside Park Housing

Authority/Senior Activity Center 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 client can be affected differently than another client, obtaining comments this way allows for an individualized response to an individual need. Cliffside Park Housing Authority/Senior Activity Center 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. Clients 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 Cliffside Park Housing Authority/Senior Activity Center analysis along with all public feedback received. The public comments are presented at Board of Commissioners Committee meetings so that they are part of the decision making process.

Website: www.cphousingauthority.com

Cliffside Park Housing Authority/Senior Activity Center website provides round-the-clock information on the transit system, including, route schedules and maps. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. Cliffside Park Housing Authority/Senior Activity Center 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. Clients also may apply on line to become a member of Cliffside Park Housing Authority/Senior Activity Center Client Advisory Board, which reports directly to the Cliffside Park Housing Authority/Senior Activity Center Management staff. This council is representative of both minority and non-minority groups.

Community Events

Cliffside Park Housing Authority/Senior Activity Center 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. Cliffside Park Housing Authority/Senior Activity Center staffers man a display booth and provide information on public transit activities/Senior Center events and review client feedback.

Information Tables

When Cliffside Park Housing Authority/Senior Activity Center wants to advise the public of specific projects that will have a direct impact on riders, Cliffside Park Housing Authority/Senior Activity Center staff will conduct personal interviews at the Cliffside Park Senior Center and transcribe oral comments or assist client surveys to receive customer input.

Outreach to Community Groups

Cliffside Park Housing Authority/Senior Activity Center` 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.

Jurisdictional Meetings

Cliffside Park Housing Authority/Senior Activity Center` conducts an extensive outreach program with jurisdictions throughout its service area. Various meetings annually are conducted to gather meaningful feedback on current transit needs issues, offer information about the services Cliffside Park Housing Authority/Senior Activity Center provides, and enhance relationships with our stakeholders.

Cliffside Park Housing Authority/Senior Activity Center Language Assistance Plan (LAP) to Address Service to Individuals with Limited English Proficiency

The Cliffside Park Housing Authority/Senior Activity Center is responsible for the management of the Senior Transport service, Cliffside Park Housing Authority/Senior Activity Center Senior Transport bus service and Cliffside Park Housing Authority/Senior Activity Center 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 Cliffside Park Housing Authority/Senior Activity Center service, Cliffside Park Housing Authority/Senior Activity Center. This Language Assistance Plan (LAP) applies to the Cliffside Park Housing Authority/Senior Activity Center **service area** services 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 Cliffside Park Housing Authority/Senior Activity Center uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps Cliffside Park Housing Authority/Senior Activity Center 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 Cliffside Park Housing Authority/Senior Activity Center.
- 2) The frequency with which LEP persons come into contact with Cliffside Park Housing Authority/Senior Activity Center.
- 3) The nature and importance of Cliffside Park Housing Authority/Senior Activity Center 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 Cliffside Park Housing Authority/Senior Activity Center.

Description of the Limited English Proficient Population(s) Served

The Cliffside Park Housing Authority/Senior Activity Center system serves communities in surrounding area within the Cliffside Park Housing Authority/Senior Activity Center **service area**. The Cliffside Park Housing Authority/Senior Activity Center commuter bus service operates between various points in the **service area** to the communities of **Other Towns, Bergen County Buses** and the **Bus Express** that serves the Bergen County South Region. For the purpose of this document, the study area includes all of Cliffside Park Housing Authority/Senior Activity Center **service area**.

American Community Survey 5-Year Estimates from 2012 reveal that at the county level, while there are numerous languages spoken at home, there are six (6) languages spoken where more than 1,000 people speak English less than very well. Those six (6) languages are included in the following table.

If bi-lingual services are needed, contact: Joseph Capano or Frank Merchand at 500 Gorge Road, Cliffside Park, NJ, 07010, 201-941-0655, fax: 201-941-4038, www.cphousingauthority.com

Languages at the County Level

Source: American Community Survey, 5-Year Estimates, 2013. 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 person’s total, including raising the number of Korean and Russian LEP persons above the 1,000 person threshold.

*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 2013 American Community Survey, Borough of Cliffside Park has a total population of 23,594 residents, which 4,500 are over 60 years of age. Bergen County has a population of 925,328 which 73.40 percent speak only English, while the remaining 26.60 percent speak other languages, either in addition to or instead of English. Cliffside Park has 12.1 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 30 percent.

Language Spoken	Number that Speak English less than very well (Estimated)	Percentage that speak English less than very well
Spanish	6704	28.41%
Asian & Pacific Island	3252	13.78%
Other Indo-European Languages 2042		8.65%
Other Language	897	3.80%

Cliffside Park Senior Activity Center Advisory Board

Louis Papaletti

Harry Guttilla

Maria Maraia

Barbara Joseph

Yolanda Nino

Lisa Frato

Marie Donato

Linda Phillips Perez

Advisory Board Minority Representation Analysis

Body	Caucasian	Latino	Asian	Other Ethnicity
Population of the Service Area	96.5%	1.2%	1.2%	1.2%
Advisory Board	100%			

Cliffside Park Housing Authority Commissioners

Peter Colao-Chairman

Simone Carafa – Vice Chairman

Salvatore Spoto- Commissioner

Janet Merrill – Commissioner

Ralph Calabrese – Commissioner

Harry Guttilla Commissioner

Lynn De Lucia – Commissioner

Joseph Capano – Executive Director/Secretary

Above Commissioners implement policy and guidance under the Executive Director. Meeting agenda's and minutes can be accessed thru our website: www.cphousingauthority.com

Commissioners Minority Representation Analysis

Body	Caucasian	Latino	Asian	Other Ethnicity
Population of the Service Area	100%			
Commissioners	100%			