



“Respecting Diversity, Preserving Dignity”

Title VI Plan

This Title VI plan was prepared with the guidance of NJ TRANSIT’s Senior Coordination Administrator.

August 6, 2025

984 Tuckerton Road
Marlton, NJ 08053
856-983-2900
www.evesham-nj.org



Title VI Non-Discrimination Policy

The Township of Evesham operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint in writing to The Township of Evesham.

To file a complaint, or for more information on The Township of Evesham's obligations under Title VI write to:

Human Resources, Township of Evesham
984 Tuckerton Road, Marlton, NJ 08053

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 to both The Township of Evesham 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

If information is needed in another language, please contact the Township Director of Public Information contact (856)-988-4423.

Dissemination

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

- Evesham Township Municipal Building (lobby), 984 Tuckerton Road, Marlton, NJ
- Evesham Township Municipal Building (HR office), 984 Tuckerton Road, Marlton, NJ
- The Gibson House, 535 E. Main Street, Marlton, NJ
- Behind the seat of all federally funded vehicles
- <https://evesham-nj.org/government/forms/human-resources>



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 The Township of Evesham (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The Township of Evesham investigates complaints received no more than 60 calendar 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 21 business 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: 1) A closure letter or 2) 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 business 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:

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: _____

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:

Human Resources, Township of Evesham
984 Tuckerton Road, Marlton, NJ 08053

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

As of the initial date of adoption of this Title VI Plan, there have been no investigations, complaints, and/or lawsuits filed with the Evesham Township.

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.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				

Public Participation Plan

Public Participation Plan #1

The Township of Evesham complies with Federal Transit Law 49 United States Code (USC) Chapter 53, Section 5307 (d)(1)(I) by developing a locally written process for soliciting and considering public comment before raising a fare or carrying out a major service reduction. In addition, the following public outreach and participation plan meets the requirements of U.S. DOT Order 5610.2(a), Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, FTA C 4703.1 Environmental Justice.

The Township of Evesham 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.

Public Information and Notifications

The Township of Evesham publishes notices, brochures and tables regarding The Township of Evesham'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 generally 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
- Customer newsletters (print and e-mail)
- E-mail blasts and alerts via text or e-mail
- Website links and articles

Meeting Locations: The Township of Evesham 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 The Township of Evesham activities that will impact them, especially LEP and minority populations. 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, The Township of Evesham conducts public meetings that utilize one-on-one interviews with customers. The Township of Evesham 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. The Township of Evesham 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 The Township of Evesham'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: The Township of Evesham'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. The Township of Evesham 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 The Township of Evesham's Customer Advocacy Group, which reports directly to the Township of Evesham Management staff. This council is representative of both minority and non-minority groups.

Community Events: The Township of Evesham 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. The Township of Evesham staffers man a display booth and provide information on public transit activities and review customer feedback.

Information Tables: When The Township of Evesham wants to advise the public of specific projects that will have a direct impact on riders, The Township of Evesham 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

The Township of Evesham 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. The Township of Evesham has associations with various non-profits and volunteer groups which assist LEP persons.

Jurisdictional Meetings: The Township of Evesham conducts monthly council meetings and occasional community meetings within its service area. At these meetings, the meeting is opened to the public which can gather meaningful feedback on current transit needs issues, offer information about the services The Township of Evesham provides, and enhance relationships with our stakeholders.

Sample F – Language Assistance Plan

Language Assistance Plan

Evesham Township Language Assistance Plan (LAP) to Address Service to Individuals with Limited English Proficiency (LEP).

The Township is responsible for the management of the municipal local bus service. NJ Transit is the Primary Recipient of funds from the Federal Transit Administration (FTA). Sub-Recipients within the NJ Transit jurisdiction receive their FTA grant awards for public transportation through the NJ Transit. The sub-recipients include the service area for the Township bus service. This Language Assistance Plan (LAP) applies to the Township 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 Township uses information obtained in a Four Factor Analysis to determine if the specific language services provided are appropriate. This analysis helps the Township 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 the Township bus service.
- The frequency with which LEP persons come into contact with the Township bus service
- The nature and importance of the Township 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 the Township.

Four Factor Analysis

Factor #1: Description of the Limited English Proficient Population(s) Served

The Township with a population of approximately 50,000 residents is one of the largest municipalities in Burlington County. The local Township bus services both the senior and disabled residents. The Township bus service operates between various points throughout the entire township which includes transit routes; residential, recreation, civic and non-residential areas. For the purpose of this document, the study area includes all of the Township. Please note that Census data shows that there are no major LEP language populations in Evesham.

Table 1		Evesham Township, Burlington County, New Jersey	
Language	Estimate	Margin of Error	
Total:	45,296	±352	
Speak only English	40,548	±679	
Spanish:	1,093	±383	
<i>Speak English "very well"</i>	952	±335	
<i>Speak English less than "very well"</i>	141	±92	
French, Haitian, or Cajun:	11	±16	
<i>Speak English "very well"</i>	11	±16	
<i>Speak English less than "very well"</i>	0	±29	
German or other West Germanic languages:	26	±29	
<i>Speak English "very well"</i>	26	±29	
<i>Speak English less than "very well"</i>	0	±29	
Russian, Polish, or other Slavic languages:	125	±79	
<i>Speak English "very well"</i>	98	±61	
<i>Speak English less than "very well"</i>	27	±34	
Other Indo-European languages:	1,245	±345	
<i>Speak English "very well"</i>	1,038	±296	
<i>Speak English less than "very well"</i>	207	±99	
Korean:	298	±194	
<i>Speak English "very well"</i>	216	±173	
<i>Speak English less than "very well"</i>	82	±65	
Chinese (incl. Mandarin, Cantonese):	348	±253	
<i>Speak English "very well"</i>	59	±46	
<i>Speak English less than "very well"</i>	289	±246	
Vietnamese:	6	±13	
<i>Speak English "very well"</i>	6	±13	

<i>Speak English less than "very well"</i>	0	±29
Tagalog (incl. Filipino):	234	±165
<i>Speak English "very well"</i>	205	±139
<i>Speak English less than "very well"</i>	29	±38
Other Asian and Pacific Island languages:	983	±325
<i>Speak English "very well"</i>	740	±265
<i>Speak English less than "very well"</i>	243	±117
Arabic:	230	±180
<i>Speak English "very well"</i>	191	±173
<i>Speak English less than "very well"</i>	39	±28
Other and unspecified languages:	149	±108
<i>Speak English "very well"</i>	96	±83
<i>Speak English less than "very well"</i>	53	±44

American Community Survey 5-Year Estimates from 2023 reveal that at the municipal level (population estimate 45,296), while there are numerous languages spoken at home, approximately 969 residents speak English less than very well.

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”.

*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

In 2023, the ACS estimated that 13.0% of Evesham’s population was between the ages of 45 and 54. The percentage of school-aged children (ages 5 to 19) was approximately 18.2% and the population over 65 years of age was approximately 18.8%. The 2023 ACS reported the median age of Evesham residents was 41.2 years old. Please note that Census data shows that there are no major LEP language populations in Evesham.

POPULATION BY AGE COHORT

Label	Count	Percent
AGE		
Total population	47,612	100.00%
Under 5 years	2,316	4.9%
5 to 9 years	2,723	5.7%
10 to 14 years	3,006	6.3%
15 to 19 years	2,966	6.2%
20 to 24 years	2,437	5.1%
25 to 34 years	5,867	12.3%
35 to 44 years	6,364	13.4%
45 to 54 years	6,207	13.0%
55 to 59 years	3,756	7.9%
60 to 64 years	3,015	6.3%
65 to 74 years	4,725	9.9%
75 to 84 years	2,964	6.2%
85 years and over	1,266	2.7%

U.S. Census Bureau, U.S. Department of Commerce. "ACS Demographic and Housing Estimates." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05, 2023, <https://data.census.gov/table/ACSDP5Y2023.DP05?q=Population Total&g=060XX00US3400522110>. Accessed on February 5, 2025.

At the time of the 2023 American Community Survey (C16001), the township service area had a total population of 45,296. Of this population, 89% percent speak only English, while the remaining 11% percent speak other languages, either in addition to or instead of English. In the Township service area, 2% 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. Please note that Census data shows that there are no major LEP language populations in Evesham.

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 the Township service area speaks Spanish as their primary language. Statewide, 56.3% percent of the LEP population ages five (5) and older are Spanish-speaking. In the Township service area, 2% percent of the LEP population ages five (5) and older speak Spanish as their primary language.

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 the Township provides on a daily basis. Operational services include varied senior route service and ADA paratransit service. Individuals with limited English proficiency also come into contact with the Township by calling the customer service telephone line, visiting the facility, and using the website. A significant part of the development of the Township'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
- ◆ Printed outreach materials
- ◆ Website
- ◆ Public meetings and events

Reserved for future use (Employee and rider surveys)

Factor #3: Importance to People's Lives

Access to the services provided by the Township is critical to the lives of many who depend on the Township for access to jobs and essential services. The Township understands that if Limited English Proficiency or low-literacy is a barrier to using municipal 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 municipal bus 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 Township utilizes the services of an in-house staff member who is fluent in Spanish and other languages when needed. The Township Director of Public Relations is readily available to assist when language barriers need to be addressed.

Training Staff

The Township 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 Township manages. In order to ensure that new staff members understand this need, training is provided as part of the Township employee orientation and annual training programs.

Additional recommended language for Staff Training:

Types of training provided:

- Familiarize staff with information on the Title VI Policy and LEP responsibilities.
- Provide description of language assistance services offered to the public.
- How to document language assistance requests.
- How to handle a potential Title VI/LEP complaint.
 - An agenda will be provided on the day/date of the training
 - Sign-in sheets will be kept to keep record of the participants of the training
 - Certificates of completion of the training will be created and handed out to staff completing the training
 - A log of all staff trainings will be kept on file.

Providing Notice to Limited English Proficient Persons

As a matter of policy, all vital documents related to Township 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 Township discount program and legal signage are also printed in English and Spanish.

The Township 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 the Township 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, the Township may rely on other county resources for translation services.

Additional guidance re: LEP outreach  activities:

It should be noted that “a running log of any LEP outreach activities will be kept on file along with proof of which would include:”

- Copy of outreach activity (ex. service cancellation notice)
- Proof of (translation of notice)

Outcomes - Monitoring, Evaluating and Updating the Plan & Decision Making

The Township 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. At this time, please note that Census data shows that there are no major LEP language populations in Evesham.

To ensure this LAP will continue to be implemented successfully, the Township 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

For all policies and procedures regarding transportation related services, they are reviewed, and/or amended by the Township Manager with input and guidance from the Human Resources Department and Township counsel.

Factor #4: Resources and Costs for LEP Outreach

The Township has committed resources to improving access to its services and programs for LEP persons. To date, the costs associated with these efforts fit within the Township's marketing and outreach budget. Costs are predominantly associated with material production.

Following the Four Factor Analysis, the Township 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. The Township will continue to apply its monitoring process to ensure accessibility of services and information to the LEP population.