CITY OF CLIFTON
OUTREACH TRANSPORTATION PROGRAM

Revised Draft Title VI Submission

Title VI Non Discrimination Policy

12-4-15

900 CLIFTON AVENUE

CLIFTON, NEW JERSEY 07013

WWW.CLIFTONNJ.ORG

CONTACT:

Donna Sidoti, Program Monitor,
973-470-5853  DSidoti@Cliftonnj.org

Deidre Hughes, Supervisor, Transportation,
973-470-2236  Outreach@Cliftonnj.org
The City of Clifton 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. No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal assistance. 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 City of Clifton – Community Development Office. To file a complaint, or for more information on The City of Clifton’s obligations under Title VI write to: City of Clifton, Community Development, 900 Clifton Avenue, Clifton, NJ 07013 or visit the City of Clifton website at www.Cliftonnj.org. Outreach 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 under Title VI directly with the Federal Transit Administration at: The Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. A complaint must be filed within 180 days of the alleged discrimination. (Complaint form attached)

If information is needed in another language, please contact 973-470-5853.
Si necesita información en otro idioma, póngase en contacto con 973-470-5853. (Spanish)
如果信息是需要另一种语言，请联系973-470-5853。 (Chinese)
Jeśli informacje są potrzebne w innym języku, prosimy o kontakt 973-470-5853. (Polish)
 Если информация необходима на другом языке, пожалуйста, свяжитесь с 973-470-5853. (Russian)

**Limited English Proficiency Policy Statement**

The City of Clifton CDBG Program also assures every effort will be made to provide meaningful access to persons that have Limited English Proficiency, in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. The City of Clifton – Community Development Office currently has on file an approved LEP/LAP Plan. **All Public notices and marketing advertisements shall be published in Spanish as well as English and will be published in local Spanish media.** The City of Clifton participates in the Special Improvement District areas in Botany Village and Downtown Clifton where there is a significant Hispanic population and representation. Information regarding programs and services are brought to these groups on a regular meeting basis. Representatives from the City of Clifton also attend the Dutch Hill and Lakeview Avenue neighborhood meetings as liaisons for the City and also bring with them service information from the City of Clifton.

**Citizen/Public Participation Plan**

The City of Clifton's Citizen Participation Plan is designed to meet three objectives: involvement of the citizens in the design of public policies and programs; outreach to the community to educate the citizens on the array of local, state, federal and other available programs to meet their needs, and; a public hearing to give the community the opportunity to comment on proposed policies and programs.

**Public Hearings**

A public hearing will be scheduled to provide citizens an opportunity to comment on the plan. A summary of citizen comments will be attached to the Plan and these comments will be considered in formulating the plan. The city will respond to any written citizen complaints within 15 working days.
Amendments to the Plan
Any substantive amendments to the plan will be subject to review by the City Manager, and at his discretion and in accordance with relevant regulations, by the City Council with public hearings as appropriate.

Citizen Involvement
Citizens are involved in policy and program design through the networking of community development staff with established community organizations. Staff who regularly meets with community organizations includes code enforcement, fair housing, and citizen participation staff. This staff helps to organize neighborhood based activities and report back on improvement needs. Some of the organizations will include: Downtown Clifton Economic Development Group, Historic Botany Village Special Improvement District, Lakeview Civic Association, Dutch Hill Residents Association, and Botany - East Clifton Residents Association. Many of these organizations/associations are located within low/moderate population areas and therefore have the outreach to meet the needs of the traditionally underserved.

Community Outreach
The community outreach program is also a regular and ongoing effort of the City of Clifton Community Development office. Common vehicles for communication include mailings, flyers and public service announcements in the form of local newspaper advertisements. These are sometimes standalone communications and sometimes are piggybacked onto other communications. For instance, a City mailing on garbage pickups may have hotline numbers for locally available social services included on the back of the mailing. Informational items are also included with the quarterly tax bill mailings to all homeowners.

Posting Of Notice
The Title VI Nondiscrimination Notice is posted at the Clifton City Hall, 900 Clifton Avenue, Clifton, NJ, at the Clifton Senior Citizen Center, Barn C-5, 900 Clifton Avenue, Clifton, NJ 07013, and on the City of Clifton’s webpage at www.Cliftonnj.org. – Follow the Links & Information Tab – click on Individuals with Disabilities & Special Needs – Click on Clifton Community Development & Outreach Program – Click on Community Development and the Title VI Non-Discrimination Policy will be there. The Notice to Beneficiaries will be placed in Outreach Brochures and in each Outreach Transportation vehicles. The City of Clifton is a scheduled pick up/drop off curb to curb service. There are no waiting areas or reception rooms.

Chart Depicting Minority Representation on Decision-Making Bodies
Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the sub recipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees. The City of Clifton has a City Manager form of Government. The Mayor and Municipal Council are publicly elected every 4 years by the citizens of Clifton. There is not a non-elected committee.

Complaints & Investigations
No complaints or investigations have been conducted or are on file to date regarding noncompliance or violations of the Title VI Nondiscrimination Plan. (Complaints will be listed on Attachment #2 if necessary)
**Title VI Complaint Procedures**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Clifton Outreach Transportation (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The City of Clifton 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 45 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 15 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 15 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 30 days after the date of the letter or the LOF to do so.

Any person may also contact the FTA as per the following:

Visit FTA’s website, http://www.fta.dot.gov, or contact FTA Headquarters at the following address and phone number:
Federal Transit Administration Office of Communications and Congressional Affairs 1200 New Jersey Avenue SE East Building Washington, DC 20590 Phone: 202-366-4043; Fax: 202-366-3472

Complaints shall include:

- The complainant(s) name, address and phone number.
- A description of the incident that led the complainant to believe discrimination occurred.
- The basis of the complaint (i.e., race, color, national origin, sex, age, disability, income status or retaliation).
- The date(s) on which the alleged discrimination occurred. Complaints must be made within 180 days of the alleged incident.
- Name(s) and contact information of individuals who may have knowledge of the alleged discrimination.

All complaints shall be responded to, recorded and investigated. The records shall be maintained by the designated Title VI liaison.

Any citizen questions or comments may be directed in writing or by phone to: Donna Sidoti, Clifton City Hall, Community Development Office 900 Clifton Avenue, Clifton, NJ 07013 (973) 470-5853.
Federal Transit Administration
Office of Civil Rights
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)
o  Large Print
o  Audio Tape
o  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.

o  Yes
o  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:

Donna Sidoti, Program Monitor, Outreach Services, City of Clifton, 900 Clifton Avenue, Clifton, NJ 07013  973-470-5853
DSidoti@Cliftonnj.org
Title VI Program: Please mail your completed form to: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590
## List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

<table>
<thead>
<tr>
<th></th>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, or national origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Investigations</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Lawsuits</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Complaints</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
City of Clifton Community Development Block Grant (CDBG)

Language Assessment

Four – Factor Analysis

In order to determine the estimated needs of Limited English Proficient (LEP) persons in the jurisdiction of the City of Clifton, the City of Clifton conducted the following analysis:

Factor 1 – Number or proportion of LEP persons served or encountered in the eligible service area

The City of Clifton obtained information from the U.S. Census Bureau’s American Factfinder website as recommended by HUD in order to gather data about the jurisdiction’s overall population, as well as the population of LEP persons within the jurisdiction and the primary languages spoken. The table below breaks down the city’s population by race.

<table>
<thead>
<tr>
<th>Group</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>58,588</td>
<td>69.9%</td>
</tr>
<tr>
<td>Black</td>
<td>4,137</td>
<td>4.9%</td>
</tr>
<tr>
<td>American Indian</td>
<td>419</td>
<td>0.5%</td>
</tr>
<tr>
<td>Asian</td>
<td>7,488</td>
<td>8.9%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>22</td>
<td>0.0%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>10,464</td>
<td>12.4%</td>
</tr>
<tr>
<td>Hispanic, Any Race</td>
<td>26,854</td>
<td>31.9%</td>
</tr>
<tr>
<td>Total Population</td>
<td>84,136</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
This data indicated the following:

Total population 84,136 (100.0%)
Total LEP population 34,342 (41.0%)
Spanish speaking LEP population 26,854 (31.9%)
Asian language speaking LEP 7,488 (8.9%)

Data below provided by the American Community Survey 2013 1 year dataset.

Chart: B1601 Language Spoken at Home

<table>
<thead>
<tr>
<th>Subject</th>
<th>Clifton city, New Jersey</th>
<th>Percent of specified language speakers</th>
<th>Speak English &quot;very well&quot;</th>
<th>Speak English less than &quot;very well&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimate</td>
<td>Margin of Error</td>
<td>Estimate</td>
<td>Margin of Error</td>
</tr>
<tr>
<td>Population 5 years and over</td>
<td>79,452</td>
<td>+/- 1,273</td>
<td>79.8%</td>
<td>+/- 3.0</td>
</tr>
<tr>
<td>Speak only English</td>
<td>43.6%</td>
<td>+/- 4.6</td>
<td>(X)</td>
<td>(X)</td>
</tr>
<tr>
<td>Speak a language other than English</td>
<td>56.4%</td>
<td>+/- 4.6</td>
<td>64.1%</td>
<td>+/- 4.1</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>31.0%</td>
<td>+/- 4.2</td>
<td>61.5%</td>
<td>+/- 6.7</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>12.9%</td>
<td>+/- 2.8</td>
<td>63.9%</td>
<td>+/- 6.4</td>
</tr>
<tr>
<td>Asian and Pacific Island languages</td>
<td>6.1%</td>
<td>+/- 2.1</td>
<td>66.3%</td>
<td>+/- 13.0</td>
</tr>
<tr>
<td>Other languages</td>
<td>6.5%</td>
<td>+/- 2.7</td>
<td>75.0%</td>
<td>+/- 16.7</td>
</tr>
</tbody>
</table>

SPEAK A LANGUAGE OTHER THAN ENGLISH

<table>
<thead>
<tr>
<th>Subject</th>
<th>Estimate</th>
<th>Margin of Error</th>
<th>Estimate</th>
<th>Margin of Error</th>
<th>Estimate</th>
<th>Margin of Error</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish or Spanish Creole</td>
<td>24,605</td>
<td>+/- 3,380</td>
<td>61.5%</td>
<td>+/- 6.7</td>
<td>38.5%</td>
<td>+/- 6.7</td>
</tr>
<tr>
<td>5-17 years</td>
<td>4,124</td>
<td>+/- 1,463</td>
<td>88.8%</td>
<td>+/- 13.3</td>
<td>11.2%</td>
<td>+/- 13.3</td>
</tr>
<tr>
<td>18-64 years</td>
<td>18,480</td>
<td>+/- 2,540</td>
<td>60.0%</td>
<td>+/- 7.6</td>
<td>40.0%</td>
<td>+/- 7.6</td>
</tr>
<tr>
<td>65 years and over</td>
<td>2,001</td>
<td>+/- 1,007</td>
<td>19.7%</td>
<td>+/- 17.3</td>
<td>80.3%</td>
<td>+/- 17.3</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>10,216</td>
<td>+/- 2,233</td>
<td>63.9%</td>
<td>+/- 6.4</td>
<td>36.1%</td>
<td>+/- 6.4</td>
</tr>
<tr>
<td>5-17 years</td>
<td>1,028</td>
<td>+/- 675</td>
<td>91.3%</td>
<td>+/- 13.6</td>
<td>8.7%</td>
<td>+/- 13.6</td>
</tr>
<tr>
<td>18-64 years</td>
<td>7,494</td>
<td>+/- 1,687</td>
<td>66.6%</td>
<td>+/- 8.2</td>
<td>33.4%</td>
<td>+/- 8.2</td>
</tr>
<tr>
<td>65 years and over</td>
<td>1,694</td>
<td>+/- 700</td>
<td>35.4%</td>
<td>+/- 13.6</td>
<td>64.6%</td>
<td>+/- 13.6</td>
</tr>
<tr>
<td>Asian and Pacific Island languages</td>
<td>4,886</td>
<td>+/- 1,687</td>
<td>66.3%</td>
<td>+/- 13.0</td>
<td>33.7%</td>
<td>+/- 13.0</td>
</tr>
<tr>
<td>5-17 years</td>
<td>480</td>
<td>+/- 471</td>
<td>93.8%</td>
<td>+/- 14.0</td>
<td>6.3%</td>
<td>+/- 14.0</td>
</tr>
<tr>
<td>18-64 years</td>
<td>3,782</td>
<td>+/- 1,294</td>
<td>60.8%</td>
<td>+/- 13.7</td>
<td>39.2%</td>
<td>+/- 13.7</td>
</tr>
<tr>
<td>65 years and over</td>
<td>624</td>
<td>+/- 485</td>
<td>78.2%</td>
<td>+/- 33.3</td>
<td>21.8%</td>
<td>+/- 33.3</td>
</tr>
<tr>
<td>Other languages</td>
<td>5,141</td>
<td>+/- 2,188</td>
<td>75.0%</td>
<td>+/- 16.7</td>
<td>25.0%</td>
<td>+/- 16.7</td>
</tr>
<tr>
<td>5-17 years</td>
<td>1,550</td>
<td>+/- 1,350</td>
<td>97.4%</td>
<td>+/- 6.4</td>
<td>2.6%</td>
<td>+/- 6.4</td>
</tr>
<tr>
<td>18-64 years</td>
<td>3,115</td>
<td>+/- 1,628</td>
<td>66.9%</td>
<td>+/- 16.6</td>
<td>33.1%</td>
<td>+/- 16.6</td>
</tr>
<tr>
<td>65 years and over</td>
<td>476</td>
<td>+/- 404</td>
<td>55.7%</td>
<td>+/- 51.5</td>
<td>44.3%</td>
<td>+/- 51.5</td>
</tr>
</tbody>
</table>

CITIZENS 18 YEARS AND OVER

<table>
<thead>
<tr>
<th>Subject</th>
<th>Estimate</th>
<th>Margin of Error</th>
<th>Estimate</th>
<th>Margin of Error</th>
</tr>
</thead>
<tbody>
<tr>
<td>All citizens 18 years and over</td>
<td>55,321</td>
<td>+/- 2,831</td>
<td>85.9%</td>
<td>+/- 2.9</td>
</tr>
</tbody>
</table>
The above data demonstrates that there are approximately 24,605 Spanish speaking citizens within the City of Clifton and 38.5% Speak English less than “very well” and there are approximately 4,886 Asian and Pacific Islanders as part of Clifton’s population and 33.7 of that population Speaks English less than “very well”. The Spanish population totals greater than the 5% person threshold for requiring written translation of vital documents. While the Asian language speaking LEP population exceeds the threshold, the City of Clifton is confident that the actual number of potential clients is significantly lower due to the fact that children would not be seeking City of Clifton services.

The City of Clifton also completed in an informal, in-office survey to determine how many LEP persons visited or called the office, and what was their primary language, over a one-month period. This informal survey revealed that while there was significant number of Spanish-speaking LEP persons contacting the City of Clifton, there were 2-3 LEP persons who spoke languages other than Spanish.

**Fact 2 – Frequency of contact with the program**

The City of Clifton has not received any comments indicating a lack of availability of LEP assistance.

Through past experiences, the City of Clifton determine that on average, there are 1-2 Spanish speaking LEP persons contacting the City of Clifton on a daily basis for information or assistance. Because of this, the City of Clifton is committed to maintaining bilingual staff and has one bilingual Housing Inspectors fluent in Spanish in order to resolve higher level concerns of Spanish speaking LEP persons. The City of Clifton also has a bilingual employees at the Clifton Senior Center located on the City Hall property who can translate in: Spanish, Greek and Polish and are available to assist with translation as needed.
Any member of the community can call or stop in the office and they will be assisted.

Contacts with LEP persons who speak languages other than Spanish are infrequent. However, every measure is made to assist any non-English speaking individual such as: seeking out other individuals that can translate or using a computer based translator to serve the individual’s needs.

**Fact 3 – Importance of service, information, program or activity**

The services provided by the City of Clifton are important as they relate to a client’s need for or continued provision of affordable housing, transportation, senior and disabled services and needs as relating to energy assistance and prescription/medical assistance.

The City of Clifton receives Community Development Block Grants funds. Outreach Transportation services are provided with Municipal and Passaic County Funds from the Passaic County Transportation Department as well as CDBG funds. Each year, members of the community including Special Improvement Districts, religious organizations, community groups and senior citizen groups are contacted to provide input as to the planning of the use of the CDBG funds for the upcoming year. The input of these groups are used in the planning of the upcoming years funding which also include the Outreach Transportation Program.

The City of Clifton Older Adult Services office serves approximately 1000 senior citizen/disabled individuals per year and offers information and referral services regarding senior needs and transportation. The Older Adult Service office also surveys individuals as they are being assisted to ascertain any additional need beyond what the City is current offering.

There is a Spanish speaking bilingual staff person available to assist the Spanish speaking population at the Clifton Senior Center. Also available are Greek and Polish bilingual employees to offer assistance.

The Clifton Senior Citizen Advisory Committee meets once a month and hears the needs of the community. The committee consists of 10 volunteer senior citizens from the various sections of Clifton and one City Council representative. Copies of the minutes are forwarded to the Community Development Office monthly and reviewed to address any needs or concerns of the group.

The City of Clifton belongs to “United We Ride.” The City of Clifton’s Coordinator of Special Transportation serves on the Committee of United We Ride and also the Citizens Advisory Committee. The committee meets every three months. Public Hearings are held once a year and the City of Clifton also attends the NJ Transit public hearings. Input is brought back to the Transportation office as a result of attendance at these meetings and used as a planning tool to assist our clients.

The coordinated plan can be found at the following website:


All efforts will be made to continuously meet the needs of the LEP population through a wider distribution of informational brochures/posters/newspaper advertisements. This information will be translated and provided in Spanish. Information will and has also been distributed to Spanish-speaking groups and leaders to make the LEP population aware of the services that are offered by the City of Clifton and the Transportation Program.
Factor 4 - Costs versus resources and benefits

Because the City of Clifton has some Spanish speaking staff, it is cost effective for the City of Clifton to provide Spanish language translation of all vital documents and many others that while not vital, may be beneficial to a client. The City has also utilized a Spanish Translation service to translate documents into the Spanish language.

The City of Clifton will utilize any documents provided by HUD in languages other than English. The City also posts Non-Discrimination posters in English, Spanish and Asian on its property and also in the Senior Citizen Complex.

The City of Clifton will seek to retain the services of a professional interpretation service to provide oral interpretation in languages other than Spanish as needed.
City of Clifton Community Development Block Grant (CDBG)

Language Assistance Plan

I. **Introduction**

The City of Clifton is committed to providing equal opportunity housing in a non-discriminatory manner, and in complying fully with all Federal, State and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. This includes complying with Title IV of the Civil Rights Act of 1964 to ensure meaningful access to programs and activities by Limited English Proficient (LEP) persons.

The purpose of this Language Assistance Plan (LAP) is to identify how the City of Clifton will ensure its methods of administration will not have the effect of subjecting LEP persons to dissemination because of their national origin, and to ensure LEP persons have full access to programs services.

II. **Who is LEP?**

For the purposes of this LAP, anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English may be LEP.

The City of Clifton will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

III. **Identification of Languages Needs Within the Jurisdiction**

It was determined through review of the U.S. Census Bureau’s American Fact Finder for the city of City of Clifton, as recommended by the U.S. Department of Housing and Urban Development (HUD), that Spanish was the only language to meet the 4 factor analysis criteria (1 – Number or proportion of LEP persons served or encountered in the eligible service area; 2 – Frequency of contact with the program; 3 – Importance of service, information, program or activity; 4 - Costs versus resources and benefits) requiring translation of vital documents, this was supported by the volume of encounters with LEP persons where virtually all were Spanish speaking. According to Fact Finder, there are 23,237 Spanish-speaking persons and 9,903 Spanish-speaking persons in City of Clifton who speaks English less than very well. Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be serviced or likely to be affected or encountered. The City of Clifton has determined that because there are more than 1,000 Spanish-speakers in City of Clifton who speak English less than very well, the City of Clifton will translate vital documents such as those required by HUD and how to use transportation services such as scheduling information, etc. into Spanish.
The next largest LEP populations are persons who speak Asian languages. This is a population of 4,866, which is 6% of the City of Clifton population of 79,452. In addition, this number is a combination of many different languages, which signifies that when each individual language is separated from this group, the percentage of LEP persons in this language group is even less than 1%. The City of Clifton also took into consideration that while there are 4,866 LEP persons in this population, not all of them will seek assistance from the City of Clifton program and services as some of them are children and others will not need the type of services provided by the City of Clifton. The City of Clifton has determined that because there is less than 5% or 1,000 people in any of the Asian languages, it will not translate vital documents into these languages. However, the City of Clifton will provide oral interpretation as needed to LEP persons requesting such services.

Other language groups in City of Clifton had few LEP persons and therefore did not meet the threshold to require written translation of vital documents into those languages. The City of Clifton will provide oral interpretation as needed to LEP persons requesting such services.

IV. **Written Translation**

As stated above in Section III, the City of Clifton has determined that because there are more than 1,000 Spanish-speakers in City of Clifton who speak English less than very well, the City of Clifton will translate vital documents such as those required by HUD and how to use transportation services such as scheduling information, etc. into Spanish. As of the date of the creation of this LAP, Spanish is the only language into which vital documents will be translated. This is subject to change upon review of the LAP as discussed below.

A. **Vital Documents**

HUD has defined “vital documents” to be those documents that are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and LEP persons specifically. In general, the City of Clifton will attempt to translate all letters sent to program applicants and participants to Spanish. However, the following is a list of documents the City of Clifton has determined to be vital and has committed to translating into or providing HUD-approved version in Spanish:

**Already Translated or Have Translations Provided by HUD**

- Housing Choice Voucher, including Family Obligations
- Letter of Informal Hearing
- Informal Hearing Procedures
- Informal Hearing Result
- Instructions on Moving After Receiving/Giving Notice to Move
- Notification of Pro-ration of Assistance Based on Non-Eligible Household Members
- Repayment Agreement
- Denial of Unit
- Notification of Social Security Number Discrepancy
- Proposal of Termination of Program Participation
- Letter Confirming Voluntary Termination
- Brochure Explaining Rights Under the Americans with Disability Act
- Brochure Explaining Family Self-Sufficiency Program
- Brochure Explaining Housing Choice Voucher Home Ownership Program
- Family Obligations Checklist
- Authorization to Release Information with Privacy Act Statement
V. **Oral interpretation**

The City of Clifton will make every effort to provide oral interpretation for all its clients who have identified themselves as LEP and request services.

A. **Bilingual Staff**

The City of Clifton employs bilingual, Spanish-speaking staff in several positions, including housing inspectors, to ensure there are sufficient personnel available to assist Spanish-speaking LEP persons when needed. Currently the City of Clifton has one full-time Spanish-speaking staff member. The Clifton Senior Citizen office employs a Passaic County Site Manager that is a Spanish-speaking staff member. In addition, the City of Clifton has access to other bilingual City employees, including numerous Spanish-speaking staff, as well as staff who speak Polish, Russian, Italian and Arabic.

B. **Interpretation Services**

When there is not a City of Clifton City staff person who speaks the LEP person’s primary language, the City of Clifton will seek interpretation through a professional interpreter service.

In the event that the LEP person’s primary language is not widely spoken and the City of Clifton is unable to locate a suitable interpreter through a professional interpreter service, the City of Clifton may resort to other methods such as seeking community volunteers. As a last resort in case where the City of Clifton is unable to find an acceptable interpreter within a time frame to effectively assist the client, the City of Clifton may use an online translation website in order to communicate via an in-office computer.

C. **Informal Interpreters**

The City of Clifton will generally discourage the use of family members or other informal interpreters, but will allow the use of an interpreter of the LEP person’s choosing (including family members or a professional interpreter at the LEP person’s own expense) when the LEP person rejects the City of Clifton free language assistance services. The City of Clifton will document the offer and the LEP person’s subsequent rejection.

VI. **Outreach**

The City of Clifton will conduct outreach in a method that is inclusive of LEP persons identified through its bi-annual analysis. All Public Notices and marketing advertisements shall be published in Spanish as well as English, and the City of Clifton will publish these in local Spanish media. The City of Clifton may also
participate in community-sponsored events, and make presentations through community organizations to target LEP persons and ensure they are aware of the availability of LEP assistance.

For clients, reception service is provide in Spanish, flyers and other communications posted in the lobby are translated into Spanish, and interviews and programs briefings are conducted with the help of a Spanish interpreter. Brochures advertising other available programs within the organization are also available in Spanish.

For clients who are LEP but are not Spanish-speaking, the City of Clifton Receptionist has a document created by the US Census Bureau translated into 38 different languages to use as a tool to identify the client’s primary language. The City of Clifton will also seek translation of a notice announcing the availability of primary language assistance into as many languages as possible to be posted in the lobby. Until this is achieved, the City of Clifton will post the notice in English.

VII. Staff Training

The City of Clifton will provide a copy of this LAP to all existing staff, and will also provide training as to its contents and what is required of them under its policies twice a year or as new information is made available. This training shall include the types of services available to clients and how to access them. New employees will receive this LAP and the same training as part of their orientation.

VIII. Monitoring and Updating of This LAP

The City of Clifton will review/revise this LAP on an as needed basis, but not less than every two years to ensure the populations of the various language groups within the jurisdiction and their needs are reflected in the provision of primary-language services. At that point the Plan will be reviewed to determine if the existing LEP services are sufficient to meet the needs of LEP clients.

Monthly reports are produced and compared which also indicate the race/ethnicity of our riders. These reports will be compared to review the effectiveness of reach to our LEP population. Periodic ads will be placed in non-English speaking newspapers to continually advertise the various services provided.

Events that will be considered indicators of the need for a review of the LAP and will also be utilized to identify the need for LEP assistance in other languages include but not limited to LEP populations within the jurisdiction encountered or affected; frequency of encounters with LEP population; and continued availability of existing resources and the addition of new resources.
RESOLUTION APPROVING AND ADOPTING TITLE VI NONDISCRIMINATION POLICY FOR CITY OF CLIFTON

WHEREAS, the City of Clifton Outreach Transportation Office has applied for and received vehicles from New Jersey Transit; and

WHEREAS, NJ Transit requires that all recipients of awarded vehicles comply with and have a Title VI Nondiscrimination Policy in effect for their program; and

WHEREAS, a Title VI Nondiscrimination Policy for the City of Clifton, a copy of which is attached hereto and made a part of this resolution, has been proposed for adoption; and

WHEREAS, an additional requirement is that a public hearing be held to afford the public an opportunity to provide comment and input for consideration before a policy is adopted; and

WHEREAS, a public hearing was held on November 17, 2014, and there were no amendments to the proposed policy;

NOW, THEREFORE, BE IT RESOLVED, by the Mayor and Municipal Council of the City of Clifton, that the Title VI Nondiscrimination Policy attached hereto is hereby approved and adopted by the City of Clifton.

INTRODUCED: [Signature]

ADOPTED: November 17, 2014

[Signature]

JAMES ANZALDI, Mayor

ATTEST:

[Signature]

NANCY PERRIGNO, City Clerk

CIUDAD DE CLIFTON

PROGRAMA DE AYUDA DE TRANSPORTACION

19
Título VI Política no discriminatoria

900 CLIFTON AVENUE
CLIFTON, NEW JERSEY 07013

WWW.CLIFTONNJ.ORG

CONTACTO:

Donna Sidoti, Monitora del Programa,
973-470-5853
DSidoti@Cliftonnj.org

Deidre Hughes, Supervisora, Transportación,
973-470-2236  Outreach@Cliftonnj.org
Ciudad de Clifton - Título VI Declaración de Política No discriminatoria

La ciudad de Clifton opera sus programas y servicios sin reparar en raza, color, u origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, según ha sido enmendada. Ninguna persona debe, basado en raza, color, u origen nacional, ser excluido de participar en, ser negado beneficios de, o ser sujeto a discriminación bajo ningún programa o actividad que reciba asistencia federal. Cualquier persona que estime que el o ella ha sido agraviado por alguna práctica discriminatoria bajo el Título VI puede presentar una queja por escrito a la ciudad de Clifton – Oficina de Desarrollo Comunitario. Para presentar una queja, o para más información sobre las obligaciones de la ciudad de Clifton bajo el Título VI escriba a: City of Clifton, Community Development, 900 Clifton Avenue, Clifton, NJ 07013 o visite la pagina de Internet de la Ciudad de Clifton al www. Cliftonnj.org. Los servicios de ayuda de transporte provistos por esta agencia son en su totalidad o en parte pagados a través de fondos federales recibidos a través de NJ TRANSIT y como individuo usted tiene el derecho de presentar su queja bajo el Título VI a NJ TRANSIT por escrito a: Administración Federal de Transito a: The Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Su queja debe ser presentada dentro de 180 días de la alegada discriminación. (Formulario de quejas adjunto)

Si necesita información en otro idioma, póngase en contacto con 973-470-5853. (Español)
如果信息是需要另一种语言，请联系973-470-5853。(Chino)
Jeśli informacje są potrzebne w innym języku, prosimy o kontakt 973-470-5853. (Polsko)
Если информация необходима на другом языке, пожалуйста, свяжитесь с 973-470-5853. (Ruso)

Declaración de Habilidad en el Idioma Ingles Limitada

El programa de la Ciudad de Clifton CDBG también asegura que todos los esfuerzos serán llevados a cabo para proveer un acceso significante a las personas con Limitada Habilidad en el idioma Ingles, de acuerdo con la Orden Ejecutiva 13166, mejorando el acceso a los servicios para las personas con Habilidad Limitada en el idioma Ingles. La Ciudad de Clifton – Oficina de Desarrollo Comunitario actualmente mantiene archivado un LEP/LAP Plan. Todas las notificaciones públicas y anuncios de mercadeo deben ser publicados en Español al igual que en Inglés y serán publicados en los medios locales de comunicación en Español. La Ciudad de Clifton participa en el Mejoramiento Especial de áreas de Distrito en Botany Village y el Centro de la Ciudad de Clifton donde existe una población y representación hispana significante. La información sobre los programas y servicios es llevada a estos grupos a través de reuniones de una forma regular. Representantes de la Ciudad de Clifton también participan en las reuniones de los barrios de Dutch Hill y Lakeview Avenue como enlace para la ciudad y también comparten información sobre los servicios de la Ciudad de Clifton.

Plan de Participación Ciudadano/Gobierno

El Plan de Participación de Ciudadanos de la Ciudad de Clifton esta diseñado para cumplir con tres objetivos: participación de los ciudadanos en el diseño de políticas y programas públicos; ayuda a la comunidad para educar a los ciudadanos en una cantidad de programas disponibles a nivel local, estatal, federal y otros programas disponibles para ayudarlos en sus necesidades, y; una reunión publica para darle a la comunidad la oportunidad de comentar en los programas y las políticas propuestas.

Reuniones Publicas

Una reunión publica será programada para proveer a los ciudadanos con la oportunidad de comentar sobre el plan. Un resumen de los comentaros de los ciudadanos será agregado al Plan y estos comentarios serán considerados en la formulación del plan. La ciudad responderá a cualquier queja presentada por escrito por los ciudadanos dentro de 15 días hábiles.
**Enmiendas al Plan**
Cualquier enmienda substantiva al plan será sujeta a revisión por el Administrador de la Ciudad, y a su discreción y de acuerdo con las regulaciones relevantes, emitidas por el Consejo Municipal con reuniones publicas como sea apropiado.

**Participación de los ciudadanos**
Los ciudadanos están envueltos en el diseño de política y programa a través del desarrollo de relaciones establecidas por el personal del departamento de desarrollo comunitario con organizaciones comunitarias establecidas. Miembros del personal que se reúne regularmente con organizaciones comunitarias incluye el departamento de cumplimiento de códigos, vivienda justa, y personal de participación de ciudadanos. Este personal ayuda a organizar actividades basadas en las barriadas y reportar sobre las mejoras necesitadas. Algunas organizaciones incluyen: Al grupo Downtown Clifton Economic Development, Historic Botany Village Special Improvement District, Asociación Cívica Lakeview, La Asociación de Residentes de Dutch Hill, y Botany – La Asociación de Residentes de Clifton Este. Muchas de estas organizaciones/associaciones están localizadas dentro de áreas de población baja/moderada por eso presentan las necesidades de los mas necesitados tradicionales y tienen la ayuda del programa.

**Ayuda Comunitaria**
El programa de ayuda comunitaria es también un esfuerzo regular y persistente de la oficina de Desarrollo Comunitario de la ciudad de Clifton. Vehículos comunes de comunicación incluyen envíos por correo, panfletos, y anuncios de servicio publico en la forma de anuncios en el periódico local. Esas comunicaciones son a veces individuales y a veces se incluyen con otras comunicaciones. Por ejemplo, una comunicación de la ciudad sobre la recogida de basura puede incluir números de teléfonos importantes para servicios sociales disponibles en la parte trasera de la notificación. Notas de notificación también se incluyen con la factura trimestral de impuestos enviadas a todos los dueños de casa.

**Destino de las Notificaciones**
Las notificaciones de VI de No-discriminación serán puestas en el Ayuntamiento de la Ciudad de Clifton, 900 Clifton Avenue, Clifton, NJ, y en Centro de Ciudadanos de Mayor Edad, Barn C-5, 900 Clifton Avenue, Clifton, NJ 07013, y en la pagina Web de la Ciudad de Clifton en [www.Cliftonnj.org](http://www.Cliftonnj.org). La Notificación para Beneficiarios será expuesta al publico en los folletos de Ayuda y en todos los vehículos de Ayuda de Transportación. La ciudad de Clifton es un dejar / acera programado recoger para frenar servicio. No hay zonas de espera o salas de recepción.

**Gráfica mostrando representación minoritaria en organizaciones que toman decisiones**
Sub-recipientes, que mantienen juntas no elegidas relacionadas con el transito, consejos consultivos o comités, o cuerpos similares, donde la membresía es seleccionada por el sub-recipient debe proveer una tabla mostrando la membresía de esos comités señalados por raza, y una descripción de los esfuerzos llevados a cabo para estimular la participación de las minorías en esas comunidades.

La Ciudad de Clifton mantiene una forma de gobierno de Administrador de la Ciudad. El Alcalde y el Consejo Municipal son elegidos públicamente cada 4 años por los ciudadanos de Clifton. No existe un comité no - elegido.

**Quejas & Investigaciones**
Ninguna queja o investigación ha sido conducida o están archivadas hasta la fecha concerniente a la incumplimiento o violaciones del Titulo VI plan de no-discriminación. (Las quejas serán listadas en el documento #2 adjunto si fuera necesario)
Procedimiento de Quejas del Titulo VI

Cualquier persona que estime que ha sido discriminada en base de raza, color u origen nacional por el programa de Ayuda de Transportación de Clifton (de aquí en adelante referido como “La Autoridad) puede presentar una queja basada en el Titulo VI completando y sometiendo el formulario de queja del Titulo VI de la agencia. La Ciudad de Clifton investigará las quejas recibidas no más de 180 días después del alegado incidente. La Autoridad procesará las quejas que estén completas.

Una vez que la queja sea recibida, la Autoridad la revisará para determinar si nuestra oficina tiene jurisdicción. El reclamante recibirá una carta de notificación informándole a el/ella si su queja será investigada por nuestra oficina.

La Autoridad tiene 45 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el reclamante. El reclamante tiene 15 días hábiles del día de fecha de recibo de la carta para enviar la información al investigador asignado al caso. Si el investigador no es contactado por el reclamante o no recibe la información adicional dentro de los 15 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso también puede ser cerrado administrativamente si el reclamante no desea continuar persiguiendo el caso.

Después que el investigador revisa la queja, el/ella enviará una de dos cartas al reclamante: una carta de clausura o una carta de descubrimiento (LOF). Una carta de clausura resume los alegatos y declara que no existió violación del Titulo VI y que el caso será cerrado. Una carta LOF resume los alegatos y las entrevistas de acuerdo al alegado incidente, y explica si alguna acción disciplinaria, entrenamiento adicional para el miembro del personal u otra acción será llevada a cabo. Si el reclamante desea apelar la decisión, ella/el tiene 30 días después de la fecha de recibo de la carta LOF para hacerlo.

or by contacting the FTA at the following:
Visit FTA’s website, http://www.fta.dot.gov, or contact FTA Headquarters at the following address and phone number:
Federal Transit Administration Office of Communications and Congressional Affairs 1200 New Jersey Avenue SE East Building Washington, DC 20590 Phone: 202-366-4043; Fax: 202-366-3472

Las quejas deben incluir:

- El nombre(s), dirección y número de teléfono del reclamante.
- Una descripción del incidente que llevo al reclamante a creer que fue discriminado.
- La base de la queja (Ej., raza, color, origen nacional, sexo, edad, discapacidad, nivel de ingreso o represalia).
- La fecha(s) cuando la alegada discriminación ocurrió. Las quejas deben ser presentadas dentro de 180 días del alegado incidente.
- Nombre(s) e información de contacto de las personas que puedan tener conocimiento de la alegada discriminación.

Todas las quejas deben ser respondidas, gravadas e investigadas. Los documentos correspondientes serán mantenedos por el enlace designado del Titulo VI.

Cualquier ciudadano puede dirigir sus preguntas o comentarios por escrito o por teléfono a: Donna Sidoti, Clifton City Hall, Community Development Office 900 Clifton Avenue, Clifton, NJ 07013 (973) 470-5853.
Administración Federal de Transito
Oficina de Derechos Civiles
Formulario de Quejas

Nota: La siguiente información es necesaria para asistir en el proceso de queja.

A. Información del reclamante:

Nombre: ________________________________________________________________
Dirección: __________________________________________________________________
Ciudad/Estado/Código Postal ______________________________
Número de teléfono (Casa) _____________________________________________
Número de teléfono (Trabajo) ___________________________________________
Correo electrónico _________________________________________________________

¿Requisitos de Accesibilidad al Formulario?
   o Letra Grande
   o Grabación Auditiva
   o Otro

B. Persona que fue discriminada (si es otra persona y no reclamante)

Nombre: ________________________________________________________________
Dirección: __________________________________________________________________
Ciudad/Estado/Código Postal ______________________________
Número de teléfono (Casa) _____________________________________________
Número de teléfono (Trabajo) ___________________________________________
Correo electrónico _________________________________________________________

Relación con la persona por la cual esta presentando la queja: __________________

Por favor explique porque esta presentando una queja a nombre de otra persona:
__________________________________________________________________________
__________________________________________________________________________
__________________________________________________________________________
Por favor confirme que usted a obtenido permiso por la parte agraviada si esta presentando en nombre de otra persona.

- Sí
- No

c. ¿Cuál de lo siguiente describe mejor la razón por la que usted estima que se cometió un acto de discriminación?

- Raza
- Color
- Origen Nacional

Otro:
________________________________________________________________________________________

D. ¿Qué día(s) se llevó a cabo la alegada discriminación?

Fecha: _____________________
Fecha: _____________________
Fecha: _____________________
Fecha: _____________________
Fecha: _____________________
Fecha: _____________________

Otro:
________________________________________________________________________________________

E. Por favor describa la alegada discriminación. Explique lo que sucedió y quien cree usted es responsable. Describa todas las personas que estuvieron envueltas. Incluya el nombre e información de contacto de la persona(s) que lo discriminó (si lo sabe) al igual que los nombres e información de contacto de cualquier testigo. Si necesita espacio adicional, adjunte otra página de papel.

________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________
F. ¿A presentado esta queja con alguna otra agencia Federal, Estatal o Local, o con alguna Corte Federal o Estatal? Liste todo lo que aplica.

Agencia Federal ____________________
Corte Federal ______________________
Agencia Estatal _____________________
Corte Estatal ______________________
Agencia Local ______________________

Si usted a marcado alguna de las agencias antes mencionadas, por favor provea la información sobre la persona contactada en la agencia/corte donde la queja fue presentada.

Nombre: ________________________________________________________________
Título: _____________________________________________________________________
Dirección: ________________________________________________________________
Número de teléfono (Casa): _________________________________________________
Número de teléfono (Trabajo): ______________________________________________
Correo electrónico: _________________________________________________________

G. Por favor firme abajo. Puede agregar cualquier material escrito u otra información que usted crea relevante a su queja.

Firma ___________________________________________________ Fecha ___________________

Material anexo: Sí _____ No _____

H. Someta el formulario y cualquier información adicional a:

Donna Sidoti, Program Monitor, Outreach Services, City of Clifton, 900 Clifton Avenue, Clifton, NJ 07013  973-470-5853 DSidoti@Cliftonnj.org

Title VI: Por favor envíe su formulario lleno a: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th. Floor – TCR, 1200 New Jersey Avenue., S.E., Washington, D.C. 20590
Listado de Investigaciones Relacionadas Con Quejas y Demandas Título VI

<table>
<thead>
<tr>
<th></th>
<th>Fecha (Mes, Día, Año)</th>
<th>Resumen (incluye base de la queja: raza, color, o origen nacional)</th>
<th>Estado</th>
<th>Acción(s) Tomada</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigaciones</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Demandas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quejas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>