SEDA-COG MPO
Limited English Proficiency Plan

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Contents

Background

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin under programs and activities that receive federal financial assistance.

In 2000, an Executive Order was signed by President Bill Clinton titled "Improving Access to Services for Persons with Limited English Proficiency." A person with Limited English Proficiency (LEP) refers to an individual for whom English is not their primary language and who has a limited ability to read, write, speak, or understand the English language. The Executive Order established that recipients of federal funds must provide meaningful access to LEP individuals and not discriminate on the basis of national origin. In 2002, pursuant to the Executive Order, the Department of Justice issued LEP Guidance, including compliance standards and processes that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons.

Four-Factor Analysis

Four-Factor Analysis is one of the primary compliance processes established in the Department of Justice's LEP Guidance. The analysis provides a framework for agencies to use in identifying the LEP populations in their service area and developing a cost-effective and meaningful plan for providing appropriate language assistance services. The Four Factors are as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a recipient's program, activity, or service.

2. The frequency with which LEP individuals come in contact with the program, activity, or service provided.

3. The nature and importance of the program, activity, or service provided by the recipient to LEP people's lives.

4. The resources available to the recipient and costs associated with providing meaningful access to LEP persons.

Factor 1 – Number or Proportion of LEP Persons Encountered

Factor 1 evaluates the number of LEP persons served or the concentration of LEP persons in the service area population. In the case of the SEDA-COG MPO, the service area population is the total population within the region served by the MPO, including the following eight counties: Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union (**Figure 1**).

Figure 1. SEDA-COG MPO Region
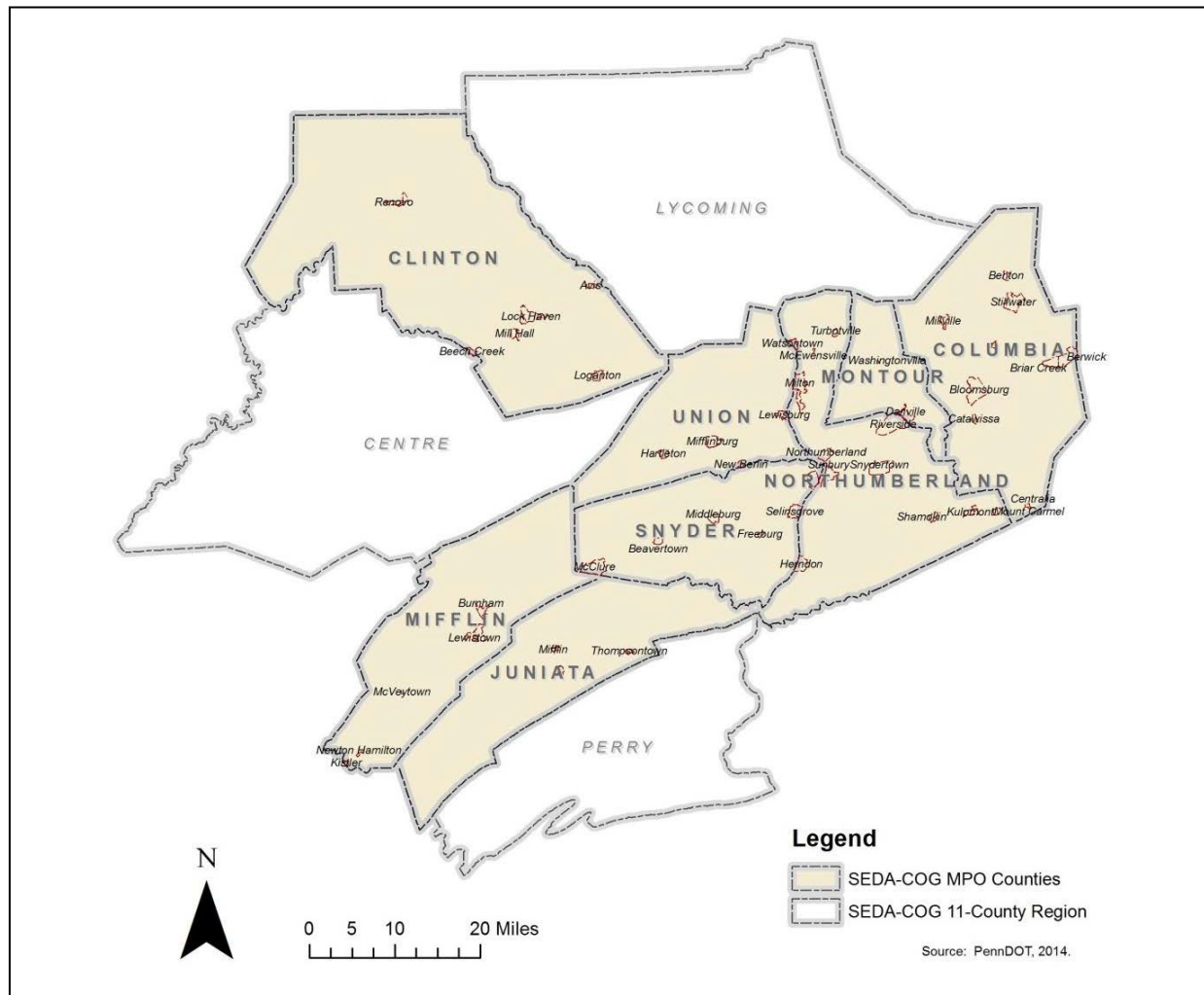
Language characteristics within the MPO region were identified using the U.S. Census Bureau's 2015-2019 American Community Survey (ACS) data. The data for "Language Spoken at Home for the Population 5 Years and Over" (Table C16001) was compiled and mapped at the tract level. Individuals are characterized as speaking English "very well" or "less than very well." For this analysis, an individual who speaks English less than very well is considered an LEP person.

It is noted that the ACS data for the SEDA-COG MPO region includes the institutionalized populations of several penitentiaries. The SEDA-COG MPO does not provide services to these institutionalized persons. However, not all of the institutionalized populations could be identified specifically and screened from

the analysis.[1] Therefore, the data summaries and mapping provided in this document include the institutionalized populations.

Total LEP Population in the SEDA-COG MPO Region

Table 1 summarizes the total population and LEP population of All Language Groups in the SEDA-COG MPO region, with comparison to the state of Pennsylvania as a whole. Of the region's total population, about 6,905 persons or 2.0% of the total population are considered to have limited English proficiency.

Table 1. Total Population and LEP Population in the SEDA-COG MPO Region vs. Pennsylvania

	SEDA-COG MPO Region		Pennsylvania	
	Population Estimate	% of Total Population	Population Estimate	% of Total Population
Total Population	351,814		12,106,328	
Total LEP Population **All Language Groups** *Speak English less than "very well"*	6,905	2.0%	542,607	4.5%

<u>**Source:**</u> U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Figure 2 illustrates the population of LEP persons in each Census tract. **Figure 3** illustrates the concentration (percentage of the total population) of LEP persons. The LEP populations are generally higher in the western and southern parts of the MPO, with the highest in Mifflin, Juniata, Northumberland, and Union counties (see **Table 3**). LEP concentrations follow a similar pattern, with Mifflin, Juniata, and Union counties having the highest concentrations.[2] Northumberland County's larger total population results in a low LEP concentration. Conversely, the lower total population of Juniata County results in a higher LEP concentration.

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[1] Union County designated the state and federal penitentiaries as their own Census tracts. The other counties in the SEDA-COG MPO region have not adopted such designations.

[2] Union County's LEP population and concentration is skewed by the institutionalized populations at United States Penitentiary (USP) Lewisburg and USP Allenwood. When institutionalized populations are removed, the remaining non-institutionalized Union County LEP population is ~795 persons, making the concentration 1.8%.

Figure 2. SEDA-COG MPO Population of Persons with Limited English Proficiency

Limited English Proficiency Population - All Language Groups
SEDA-COG Metropolitan Planning Organization

Legend

SEDA-COG MPO Tracts
Population of LEP Persons
- < 40
- 41 - 100
- 101 - 175
- 176 - 300
- > 300

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-year Estimates
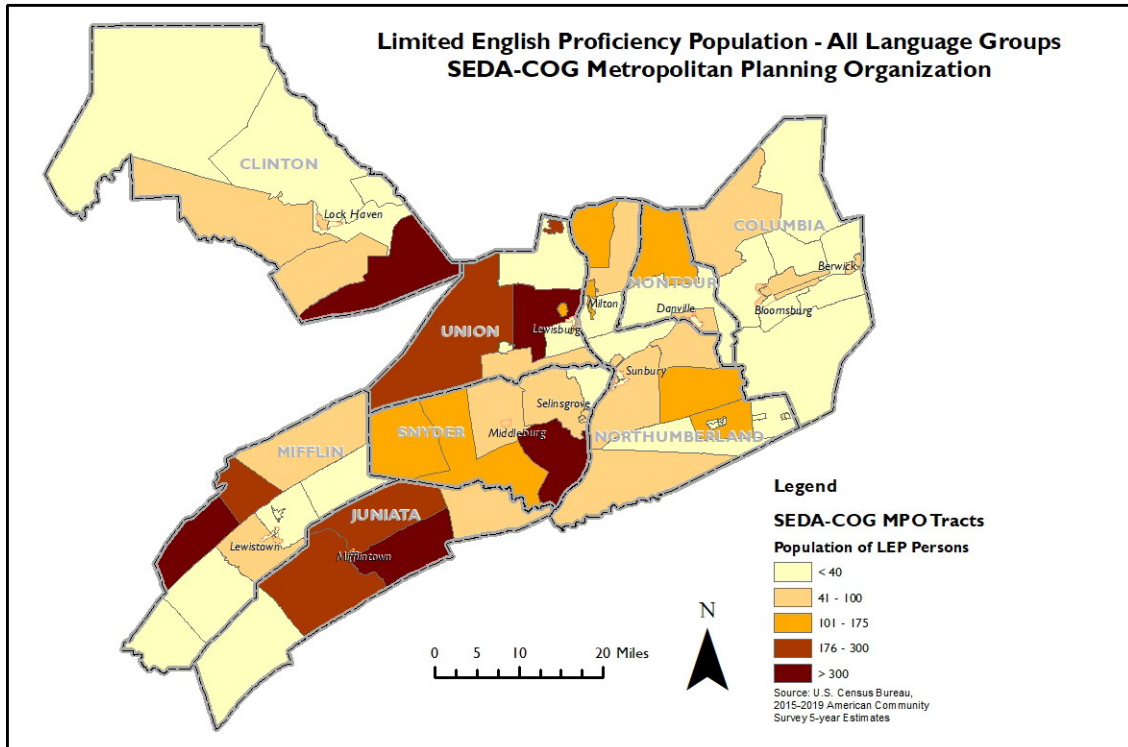
Figure 3. SEDA-COG MPO Concentration of Persons with Limited English Proficiency

Limited English Proficiency Concentration - All Language Groups
SEDA-COG Metropolitan Planning Organization

Legend

SEDA-COG MPO Tracts
Concentration of LEP Persons
- 0% - 0.64%
- 0.65% - 1.56%
- 1.57% - 2.90%
- 2.91% - 5.61%
- 5.62% - 13.06%

Regional Average: 2.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-year Estimates
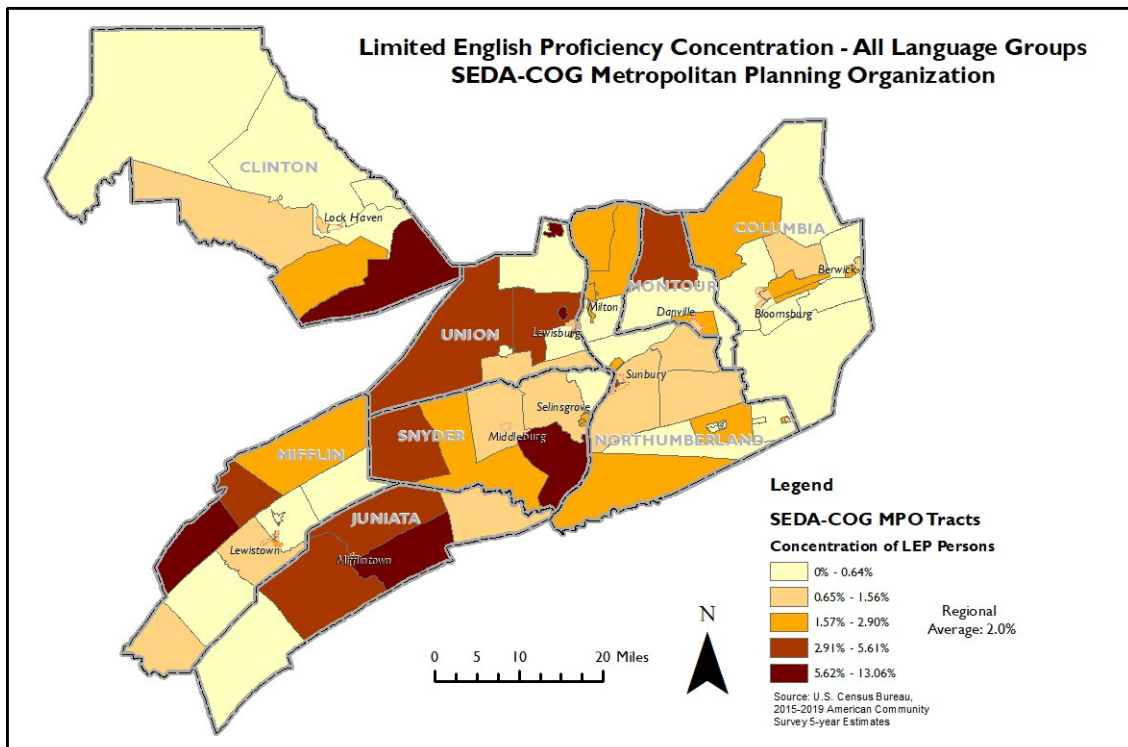
Table 3. LEP Persons for All Language Groups by County

County	Total Population	All Language Groups LEP	
		Speak English less than "very well" [1]	% of Total Population
Clinton County	36,838	613	1.7%
Columbia County	62,775	559	0.9%
Juniata County	23,208	941	4.1%
Mifflin County	43,417	1,159	2.7%
Montour County	17,207	301	1.7%
Northumberland County	87,029	1,256	1.4%
Snyder County	38,314	902	2.4%
Union County	43,026	1,174	2.7%
Total	**351,814**	**6,905**	**2.0%**

Yellow Highlight indicates highest three counties for total LEP population.
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Largest LEP Language Groups in the SEDA-COG MPO Region

Table 4 lists the top five languages spoken by LEP individuals in the SEDA-COG MPO region. Comparisons to the statewide Pennsylvania data are provided for the same language groups. The German or other West Germanic languages and Spanish language groups are by far the largest LEP populations. Beyond these "Top 5" populations, the region is also home to LEP persons who speak the following: Vietnamese (134); Russian, Polish, or other Slavic languages (118); Other Asian and Pacific Island languages (81); French, Haitian, or Cajun (77); Arabic (70); Korean (61); and Tagalog (59).

Table 4. Top Five LEP Populations in the SEDA-COG MPO Region vs. Pennsylvania

	SEDA-COG MPO Region		Pennsylvania	
	Population Estimate	% of Total Population	Population Estimate	% of Total Population
Total Population	351,814		11,933,062	
LEP Language Groups -- *Speak English less than "very well"*				
German or other West Germanic languages [1]	3,261	0.93%	30,993	0.26%
Spanish	2,249	0.64%	250,769	2.07%
Other Indo-European languages	359	0.10%	64,118	0.53%
Chinese (including Mandarin, Cantonese)	296	0.08%	46,454	0.38%
Other and unspecified languages	140	0.04%	15,165	0.13%

Notes:
[1]Presumed to be predominantly speakers of "Pennsylvania Dutch."
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Geographic Distribution of LEP Populations

Distributive mapping of the American Community Survey (ACS) data was prepared at the tract level to develop a better understanding of the LEP populations in the SEDA-COG MPO region potentially qualifying for "Safe Harbor" treatment—namely the German or other West Germanic and Spanish LEP populations.

German or Other West Germanic Language Group
Figures 4 and 5 illustrate the distribution of German or other West Germanic LEP persons according to population and concentration, respectively. At the tract level, the higher populations and concentrations generally overlap in the most rural areas of the region, including the following:

- Southern Clinton County
- Northwestern Mifflin County
- Eastern Juniata County
- Northern Montour County
- Southeastern Snyder County
- Western Union County

Table 5 summarizes the German or other West Germanic LEP populations by county. The SEDA-COG MPO region, when taken as a whole, is home to 10.5% of Pennsylvania's total German or other West Germanic LEP population. Almost 30% of the regional LEP population resides in Mifflin County, which is home to several different Amish and Mennonite groups. The next-largest populations exist in Snyder, Clinton, and Union counties. Concentrations are highest in Mifflin County (2.15%), followed by Juniata County (1.68%), Snyder County (1.63%), and Clinton County (1.09%). All other counties have concentrations less than the regional average of 0.93%.

Table 5. German or other West Germanic Language Group LEP Persons by County

| County | Total Population | German/Other West Germanic Languages LEP | |
		Speak English less than "very well"	% of Total Population
Clinton County	36,838	401	1.09%
Columbia County	62,775	89	0.14%
Juniata County	23,208	390	1.68%
Mifflin County	43,417	932	2.15%
Montour County	17,207	143	0.83%
Northumberland County	87,029	291	0.33%
Snyder County	38,314	623	1.63%
Union County	43,026	392	0.91%
Total	**351,814**	**3,261**	**0.93%**

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Spanish Language Group

Figures 6 and 7 illustrate the distribution of Spanish LEP persons according to population and concentration, respectively. At the tract level, the populations of Spanish LEP persons are generally distributed throughout the MPO region, with higher populations in the following locations:

- Central Juniata County
- Eastern Snyder County
- Eastern Union County
- Central and northern Northumberland County

Table 6 summarizes the Spanish LEP populations by county. Except for the Juniata County locations, the higher populations are generally in the more urbanized areas of the MPO. The concentrations of Spanish LEP persons are less pronounced, but occur in similar locations as the higher populations. Higher concentrations are noted in the towns of Milton, Selinsgrove, Sunbury, Berwick, and Lewistown. The highest concentrations occur in central Juniata County and the penitentiary tracts in Union County.

**Table 6. Spanish Language Group LEP Persons by County**

County	Total Population	Spanish Language LEP	
		Speak English less than "very well"	% of Total Population
Clinton County	36,838	66	0.18%
Columbia County	62,775	185	0.29%
Juniata County	23,208	507	2.18%
Mifflin County	43,417	190	0.44%
Montour County	17,207	37	0.22%
Northumberland County	87,029	678	0.78%
Snyder County	38,314	163	0.43%
Union County	43,026	423	0.98%
Total	**351,814**	**2,249**	**0.64%**

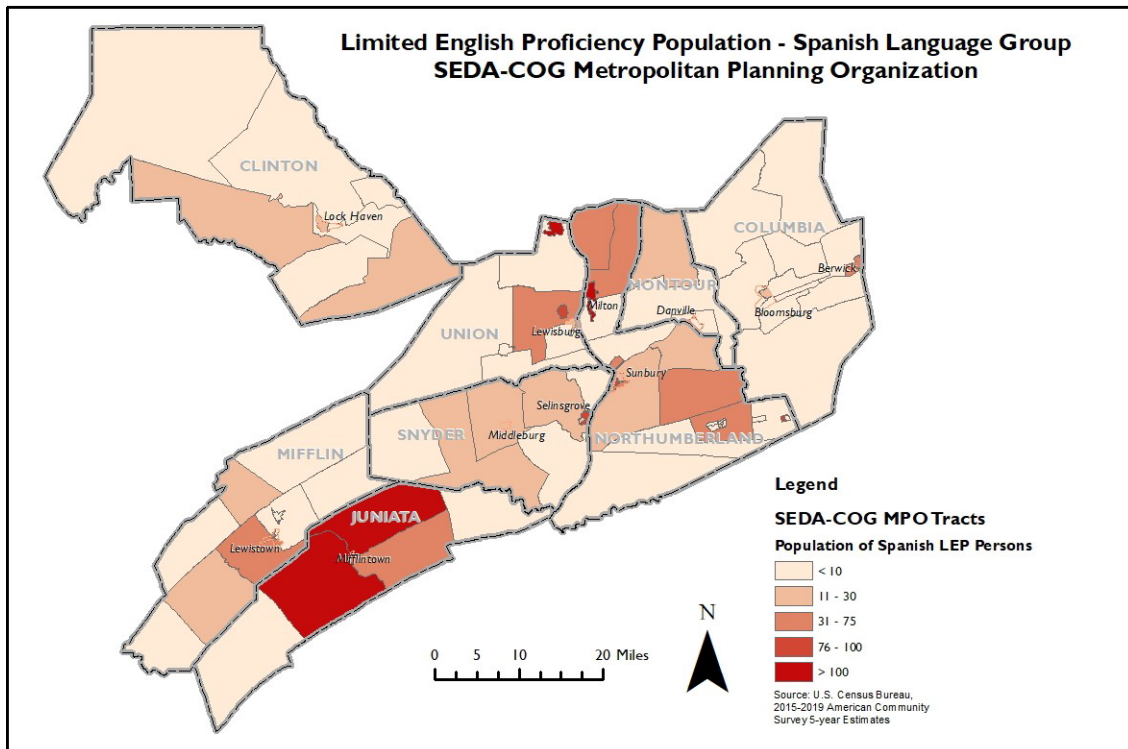**Source:** U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Figure 4. German or other West Germanic LEP Population by Census Tract
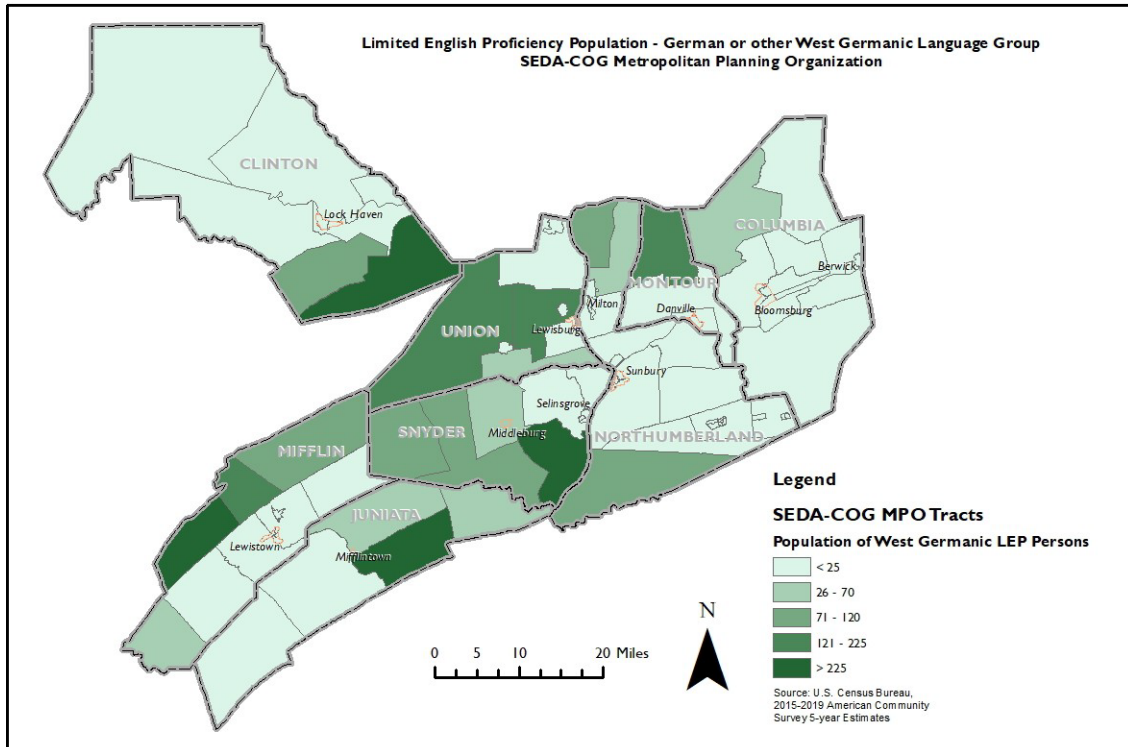
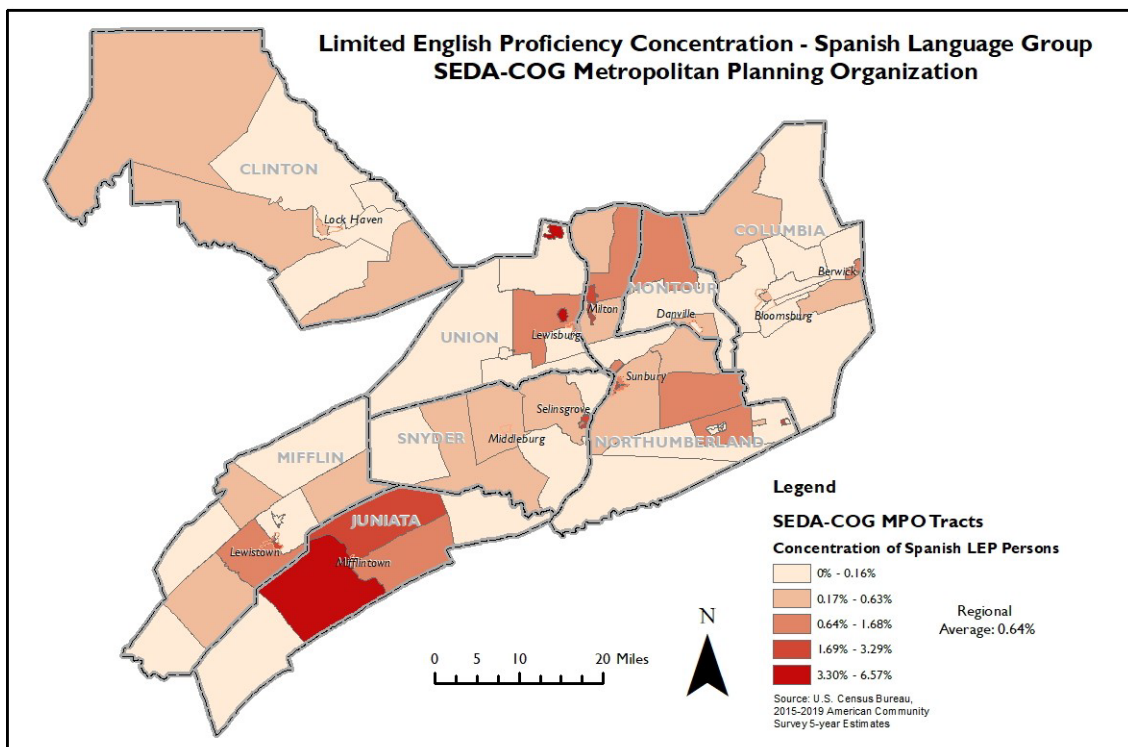## Figure 5. German or other West Germanic LEP Concentration by Census Tract
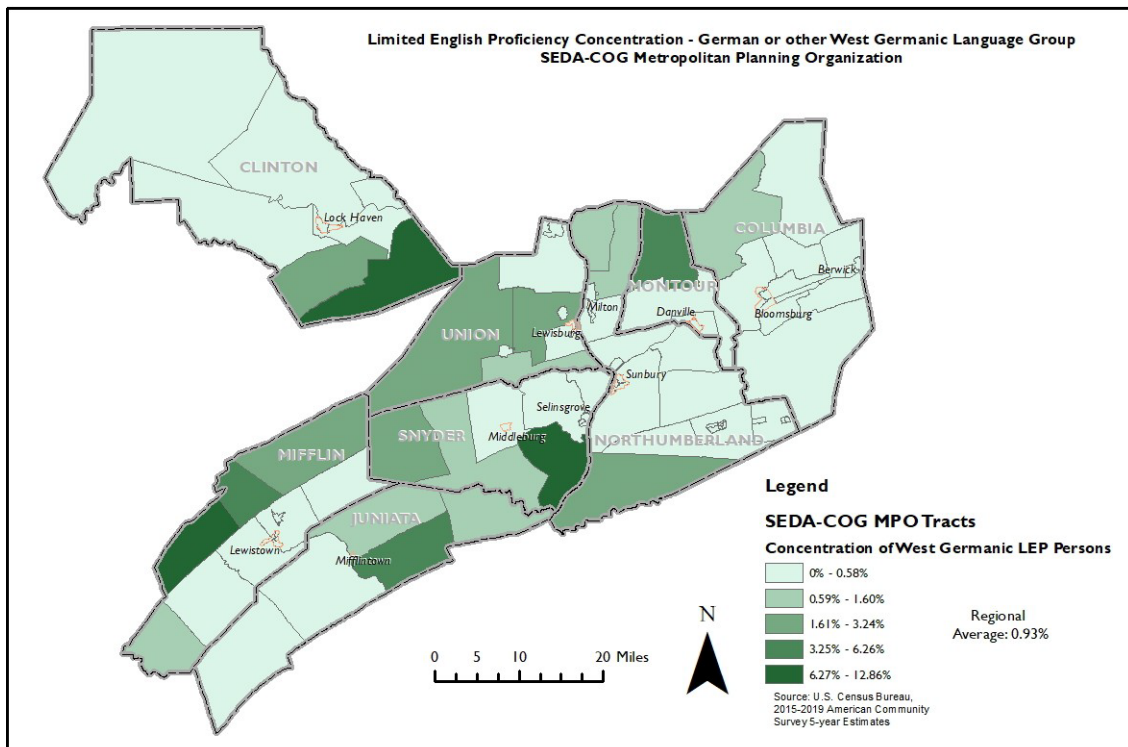
Figure 6. Spanish LEP Population by Census Tract

Figure 7. Spanish LEP Concentration by Census Tract

Safe Harbor Provision

The Safe Harbor Provision, as defined in the Department of Justice's LEP Guidance, is the most prevalent guideline used to establish when language assistance services are considered appropriate and define expectations for what those services would entail in providing a safe harbor regarding translation of written materials for LEP populations.

Safe Harbor Triggers
The Safe Harbor Provision is triggered for each LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered (FTA C 4702.1B, Chapter III-9).

Considering the SEDA-COG MPO region as a whole (i.e., the "service area"), the total LEP populations for both German or other West Germanic and Spanish language groups exceed the 1,000-person threshold, even though the regional concentrations of both populations fall below the 5% threshold (see **Table 4**). However, when the total LEP populations are viewed in light of eligibility or the likelihood of being affected or encountered, there are indications that the modified West Germanic LEP population would not trigger the Safe Harbor Provision. Generally, Amish and Mennonite communities (speakers of West Germanic, PA Dutch) deliberately avoid encounters with those outside their culture—particularly governmental agencies—preferring to allow their church leaders to represent them and speak on their behalf. These leaders are typically fluent in both English and PA Dutch. Moreover, the translation guidelines of Safe Harbor would be ineffective, as the West Germanic language is not a written language.

Therefore, it is the conclusion of this analysis that the Safe Harbor Provision is triggered[3] in the SEDA-COG MPO region for the Spanish language group alone.

Safe Harbor Translation Expectations
The provision states that providing written translation of "vital documents" for each LEP population that exceeds the Safe Harbor thresholds "shall be considered strong evidence of compliance with the recipient's [SEDA-COG MPO] written translation obligations" (FTA C 4702.1B, Chapter III-9).

Based on the standard of practice, "vital documents" typically include those that explain how to access an organization's services (including language assistance services), letters that require a response from a customer, complaint forms, and notification of rights. For the purposes of this LEP Plan, the SEDA-COG MPO has designated the following list as "vital documents" for preemptive translation. Because the MPO is committed to avoiding disparate treatment, accommodations will be made for translating any public document in any other language upon request.

- Notice of Language Services (**Appendix A**)
- Title VI Notice to Beneficiaries (**Appendix B**)

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[3] This evaluation concludes that the Safe Harbor Provision is triggered for the Spanish language group, even though the analysis has not attempted to discern the total LEP population from those "eligible to be served or likely to be affected or encountered."

- Title VI Complaint Form (**Appendix C**)
- Title VI Complaint Procedures (**Appendix D**)

Translations of the MPO's primary plans and documents (e.g., Long-Range Transportation Plan, Public Participation Plan, Transportation Improvement Program) will be provided on an as-requested basis. The SEDA-COG MPO will also include language taglines in the primary plans and provide a Document Translation Request form on its website. Finally, when a Targeted Outreach Activity is triggered by the presence of an LEP population (see Section 6 of the Public Participation Plan), written materials will be made available in the LEP language upon request.

Factor 2 – Frequency of Contact with LEP Persons

The SEDA-COG MPO provides transportation planning and programming services for the eight-county area and serves as the regional forum for transportation decision-making. Decisions made by the MPO have the potential to affect all residents of the service area, and as a result, LEP persons may also be impacted by the decisions, services, and programs instituted by the MPO. Public input is routinely sought in the development and advancement of primary planning processes (e.g., Long-Range Transportation Plan, Transportation Improvement Program, Public Participation Plan) and other plans, programs, and initiatives. Public comments are solicited from any interested party.

To date, no direct requests have been made to MPO staff by individuals or groups seeking interpreters or the translation of written publications into other languages. In the event that requests are made, MPO staff have log templates ready to enter the details of language assistance requests and encounters with LEP persons. SEDA-COG MPO staff also maintain surveys and comment forms for use at public meetings to track interaction with LEP persons, how they receive information, and how the MPO can improve services to LEP persons. A Language Identification Survey card from the U.S. Census Bureau is part of the materials maintained in the reception area or at the welcome/sign-in station of a public meeting. SEDA-COG MPO staff have also conducted outreach to statewide LEP advocacy agencies and attempted to form a Public Participation Panel that would involve local LEP advocates.

German or other West Germanic languages (PA Dutch) is the most common language spoken by LEP individuals in the SEDA-COG MPO region. Generally, the PA Dutch-speaking Amish and some Mennonite groups deliberately shy away from interaction with government agencies. These communities commonly look to a church leader to buffer inquiries, and these leaders are typically fluent in speaking the English language.

The following contact with LEP individuals has been noted for projects and plans completed in the MPO region by other parties:

- Union County Comprehensive Plan – Union County developed a plan-specific outreach effort to the Amish and Mennonite communities as part of its 2009 Comprehensive Plan. Direct contact was made with PA Dutch-speaking LEP persons, as discourse was completed through church leaders serving as interpreters.

- SR 0035/A02, Juniata River Bridge Project – The Spanish-speaking communities of Mifflin and Mifflintown in Juniata County were active participants in the public involvement process associated with the Juniata River Bridge Project, which was to replace an aging truss bridge with a modern highway bridge at another location. The new bridge location provided better mobility for vehicular traffic, but it created much longer and less accessible pedestrian pathways, particularly for LEP persons living in Mifflin and Mifflintown boroughs. The bridge replacement project was expanded to add a pedestrian bridge at the location of the former truss bridge.

The lessons learned through these experiences underscore the need to accurately identify and engage LEP persons early in project planning, programming, and development. With this LEP Plan, the SEDA-COG MPO is formally implementing recommended tools and training its staff in recognizing LEP persons, identifying their language, and serving the needs of LEP persons.

The MPO has developed an Employee Training Manual to facilitate staff training and create a central source of information related to LEP. The manual includes information about Title VI and LEP requirements; LEP in the SEDA-COG area; resources for phone, in-person, and written translation; and LEP program evaluation techniques.

Factor 3 – Nature and Importance of the Program

The SEDA-COG MPO is, primarily, a planning organization for transportation investments and priorities. The MPO's activities are important in the ongoing development of a safe and efficient transportation system that provides a desirable quality of life and economic opportunity for citizens in the region.

Roadway safety planning is one of the most important SEDA-COG MPO functions, particularly for the West-Germanic-speaking populations in the area. Crashes between vehicles and horse-drawn buggies operated by Amish or Mennonite individuals are not uncommon, and these crashes often result in fatalities or serious injuries. The SEDA-COG MPO recognizes the importance of involving West-Germanic-speaking communities when plans address locations and routes frequented by members of their community. MPO staff will work with local partners to identify appropriate audiences and conducive meeting sites for interacting with West Germanic speakers.

The SEDA-COG MPO staff has noted the "lessons learned" about the awareness of LEP populations near a project and the need for conducting thoughtful outreach. LEP persons commonly rely on public and non-motorized transportation modes, as well as roadside and off-road pedestrian and bike facilities for day-to-day transportation. While the planning activities of the MPO may not always have direct impacts, they are nonetheless important to the long-term livelihood of all those who reside in the region. Therefore, the planning activities of the MPO provide opportunity for public participation, and the MPO is implementing tools and training that will better serve LEP persons.

Factor 4 – Resources and Costs of Language Assistance Services

The SEDA-COG MPO is a small planning organization with limited capital resources available to spend on LEP services. The organization has three staff members available to facilitate interaction with LEP persons and will use low-cost or free services and automated techniques to provide translation and interpretation, upon request. The MPO dedicates resources for performing LEP analysis and maintaining language-related resources (surveys, complaint logs, taglines, website document translation request form, mapping, etc.). In addition, SEDA-COG contracts with LinguaLinx Language Solutions for on-demand phone-based interpretation services. LinguaLinx provides interpretation services for SEDA-COG by telephone, as requested, and pays all costs associated with the interpreter except for the per-minute usage fees charged to SEDA-COG. MPO staff take LinguaLinx procedures and language tip sheets to public meetings. As additional resources become available or new needs are identified, the MPO will assess its ability to expand its existing language assistance efforts.

The MPO pools resources with other elements of the larger SEDA-COG organization to maintain the administrative/reception staff and other technical staff (GIS, IT, etc.) The pooled resources of SEDA-COG also maintain the agency's website, public relations, office facility, and the associated office equipment and services. While none of the current staff is bilingual, some can recognize the Spanish language, and customer service staff have been trained on the protocols for dealing with requests for translation and interpretation and the relevant Title VI and LEP obligations of the organization. The MPO will conduct surveys of the entire SEDA-COG agency staff to ascertain the frequency of contact between the entire staff and LEP persons more broadly, and if they received requests from LEP persons for interpretation or translation. Staff will also be asked about their language abilities to determine if current staff could be resources for in-house interpretation or translation.

Language Assistance Plan

Consistent with Title VI of the Civil Rights Act, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," and the USDOT implementing guidance, the SEDA-COG MPO is responsible for taking steps that ensure meaningful access to the services, information, and other important portions of its programs and activities for individuals who are limited English proficient. This includes the development of a Language Assistance Plan (LAP), which establishes an implementation program for providing meaningful access to LEP persons, based on the results of the Four-Factor Analysis. The Four-Factor Analysis evaluated the demography of the MPO region along with the frequency of contact with LEP persons, the importance of the MPO's services to LEP persons, and resources available for accommodating LEP persons.

The overarching goal of this plan is to deploy tools and services that will enable the MPO staff to communicate with a person who does not speak English. According to the Safe Harbor Provision, this plan addresses actions for LEP persons who read Spanish. Immediate assistance for Spanish interpretation and other languages may be provided if an available service can accommodate the language requested (e.g., telephone-based phone interpretation service, local interpreters, etc.). In the event that a request presented cannot be provided as stated due to legal, fiscal, or logistical complications, a documented interactive process will be applied to work with the requesting party. Should the requesting party wish to file a subsequent complaint regarding the accommodation request, the documented interactive process will be presented to demonstrate that the MPO engaged appropriately with the complainant and took all reasonable steps to provide services in an accommodating manner.

Structure of the LAP

This Language Assistance Plan is organized around the five potential contact points where the MPO would interact with LEP persons during the course of its official planning activities:

Primary Contact Points:
- Public Meetings
- Office Walk-In
- Telephone Calls
- Webpage
- Written Correspondence

While each contact point presents certain unique language service challenges, a small set of language assistance tools is necessary to provide effective language support.

Language Assistance Tools

Notices and Advertisements

The SEDA-COG MPO uses various methods and conduits for providing notice and advertisement of the language assistance services it provides, as follows:

- Providing language taglines (see **Appendix H**) in primary plans to convey that language assistance is available by calling a specific phone number.
- Posting notices on the SEDA-COG website, which may be translated using Google Translate or another automated translation service.
- Posting translated notices in the SEDA-COG office.
- Hosting a Document Translation Request Form on the SEDA-COG website, which can be used by persons seeking MPO documents to be translated into a language other than English. This form can be found here: https://seda-cog.org/about/document-translation-request

The MPO will also use the following for certain outreach efforts and plans:

- Designing and distributing informational materials detailing SEDA-COG planning efforts, including flyers, posters, brochures, and bus advertisements.
- Radio or public service announcements in Spanish.
- Providing real-time translation services at public meetings or events with the use of headsets.
- Providing information to community or faith-based organizations frequented by LEP individuals.

The occasions for using these methods and conduits are described in subsequent sections, where they are put into the context of the various contact points.

Language Identification Card

The Language Identification Card is a one-page tool that states, in 36 languages, "Point to your language. An interpreter will be provided at no cost to you." Each language is also identified in English, so that an English-speaking person can accurately request interpretation services and engage an interpreter quickly. A sample Language Identification Card is provided in **Appendix E**. This appendix also includes a Language Identification Survey from the U.S. Census Bureau, for use where the written survey version may be more efficient. The card and survey will be a part of the materials maintained in the reception area or at the welcome/sign-in station of a public meeting.

"One Moment Please" Tool

This LEP tool gives the English phonetic pronunciation for the phrase, "One moment please," in 18 of the most common LEP languages. This simple phrase may be useful to encourage an LEP person while an interpreter or interpreter service is contacted. This tool is provided in **Appendix F**.

Telephone-Based Interpretation Service

SEDA-COG maintains a contract with LinguaLinx Language Solutions for on-demand telephone-based interpretation services. LinguaLinx provides interpretation services for SEDA-COG by telephone, as requested, and pays all costs associated with the interpreter except for the per-minute usage fees charged to SEDA-COG. MPO staff take LinguaLinx procedures and language tip sheets to public meetings. With the increasing potential for interaction with LEP persons, the SEDA-COG MPO is prepared to utilize this service, and training is provided for the MPO staff persons who are anticipated to use it. The current service is expected to continue to satisfy the level of interpretation service for the MPO's needs..

Instructions for accessing the telephone-based service, along with tips for working with an over- the-phone interpreter, are provided in **Appendix G**.

The MPO staff person who is interacting with an LEP person calls the LinguaLinx phone number and the operator will assist in identifying the LEP person's language, if necessary. An interpreter will be connected, and the conversation can proceed in conference call or three-way call mode.

Translation Services for Written Material

In compliance with the Safe Harbor Provision, the SEDA-COG MPO will provide human-translated versions of its vital documents preemptively in Spanish. Translated summaries of SEDA-COG's primary planning documents will be provided in alternative languages upon request. This encompasses the Long-Range Transportation Plan, Public Participation Plan, Coordinated Public Transit–Human Services Transportation Plan, and Transportation Improvement Program. Translations of other MPO documents will be provided via human or automated translation upon request. The on-demand telephone-based interpretation service may also be engaged to facilitate follow-up discussion and responses to specific questions.

The following are methods of providing written translation of documents:

- **Human Translation Services**
  Human translation (i.e., non-automated translation provided by human, multilingual translators) services are available both locally in the SEDA-COG MPO region and through Internet-based translation businesses who provide services nationally. A listing of selected providers is presented in **Appendix I**.

- **Automated Translation**
  Online automated translation services, such as Google Translate (https://translate.google.com/) or Bing Translator (https://www.bing.com/translator/), provide on-demand translation among multiple languages, as well as an application programming interface (API) that may be integrated into existing webpages. SEDA-COG has embedded a language drop-down menu on the entire SEDA-COG website, including the MPO's pages. In keeping with best practices for

making Web-based translation services accessible, SEDA-COG has implemented code that shows icons for the top 10 language groups in the SEDA-COG MPO's service area.

Prior verification of the SEDA-COG MPO's webpages using automatic Spanish translation revealed that the outputs were generally acceptable and provided enough information to be comprehended by Spanish-speaking individuals. Although some translational issues were identified, there were no substantive issues that would inhibit a speaker of Spanish from understanding the implied meaning of the text. If major website overhauls occur, the MPO may consider having the webpages again assessed for accuracy by a Spanish-speaking translator.

The "Four I" Approach

The "Four I" Approach is a template for structuring the implementation process at each contact point, and is defined according to the following four groups of activities:

1. **Inform**
   Providing notice to LEP persons of the language assistance services available to them.

2. **Identify**
   Recognizing LEP persons and identifying their preferred spoken language.

3. **Interact**
   Accessing and using resources for language translation and interpretation.

4. **Instruct**
   Training staff on the resources that will enable them to accommodate LEP persons.

Contact Points

Public Meetings

Public meetings are the formally announced and advertised meetings conducted by the MPO, in fulfillment of its Unified Planning Work Program (UPWP) and Public Participation Plan (PPP). In large part, this encompasses the SEDA-COG MPO Board Meetings and periodic plan-specific public meetings for the Transportation Improvement Program, Long-Range Transportation Plan, Public Participation Plan, and Coordinated Public Transit– Human Services Transportation Plan.

Public Meetings	
Inform	Legal Ad Press Releases and Social Media Webpage Ad Notice of Language Services (venue)
Identify	Contact SEDA-COG prior to meeting Language Card
Interact	Telephone-Based Interpretation Service Designated Staff Person
Instruct	Meeting Sign-In Process Accessing/Using the Telephone-Based Interpretation Service

Inform
The advertisement requirements for public meetings are prescriptive, with a legal advertisement in a "newspaper of general circulation" being the standard method for fulfilling the legal requirement for meeting advertisement. Press releases, website postings/announcements, and e-mail blasts to Interested Parties are supplemental advertisement techniques that the SEDA-COG MPO is committed to using, per its PPP.

The SEDA-COG MPO will provide notice of the availability of translation and/or interpretation services in legal ads, press releases, and website posts that announce or advertise a public meeting. The following sample text will be used and adapted, as necessary:

> The meeting is accessible to persons with disabilities. If accommodations are needed for those with special needs related to language, sight, or hearing, please call (570) 524-4491 at least five days in advance. For additional information, contact Steve Herman at the above phone number or e-mail sherman@seda-cog.org.

Identify
Whether or not an LEP person contacts the MPO prior to a public meeting, the key identification point will be the welcome/sign-in station provided at the meeting venue. It is preferable that LEP persons "self-identify" The MPO will maintain a Language Identification Card and LEP Survey as standard material for the welcome/sign-in station.

Interact
At each public meeting, the SEDA-COG MPO will have at least one trained staff person designated to interact with the LEP person(s) in attendance. This person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion. An agency-maintained cell phone with speaker capability will be provided for this purpose. (Cell phone reception should be checked when evaluating venues as potential meeting sites.)

Instruct
Training for the public meeting contact point will address the following:

- Writing Legal Advertisements, Press Releases, and Webpage Postings – Training may or may not be required for staff who draft and assemble the various announcements and other materials in which the availability of language services is advertised.
- Identifying LEP Persons – Training is recommended for persons who will staff the welcome/sign-in station. These staff should be familiar with the use of the Language Identification Card.
- Interacting with LEP Persons – Training is critical for the person who is designated to interact with the LEP persons. These staff should be familiar with the access process and credentials for the on-demand telephone interpretation service and have some experience with handling the dynamics of communication via interpreter. Learning through "shadowing" a person performing this function is recommended.

Office Walk-In

An office walk-in involves an LEP person or group visiting the SEDA-COG MPO office in person. Although this method of contact may be infrequent, the purpose of such a visit may be more urgent and have a weightier purpose—such as a discrimination complaint. Walk-in visitors are typically unannounced, but may have called ahead to arrange a meeting with a certain staff person.

Office Walk-In	
Inform	Language Reception Instructions (lobby)
Identify	Language Card
Interact	Telephone-Based Interpretation Service
Instruct	Reception Process

Inform
Initial contact between the LEP person and SEDA-COG staff will likely occur in the SEDA-COG office lobby. Therefore, the receptionist's station in the lobby will contain materials describing the process that the SEDA-COG reception staff will use to identify the language spoken and call the telephone-based interpretation service. LEP interaction log sheets will also be maintained here.

Identify
It is preferable that LEP persons "self-identify." The MPO will maintain a Language Identification Card at the Reception Desk for use in determining the language being spoken.

Interact
In all likelihood, the SEDA-COG receptionist will be the first contact point. Each reception staff person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion.

Instruct
Training for the SEDA-COG reception staff and the SEDA-COG MPO staff will address the following:

- Identifying LEP Persons – Training will focus on the use of the Language Identification Card.
- Interacting with LEP Persons – Staff will be informed about the credentials and access process for the telephone-based interpretation service. Instruction will also include general principles on interacting with an LEP person and the interpreter.

Telephone Call

Telephone calls to the SEDA-COG MPO would likely come through the main SEDA-COG phone number, in which case, they would be answered by the SEDA-COG reception staff. In particular, phone calls regarding language assistance services may be expected in reply to advertisements and other notices that request notification in advance of a public meeting.

Telephone Call	
Inform	Explanation of Services Available (through phone service)
Identify	Through Phone Service
Interact	Telephone-Based Interpretation Service
Instruct	Phone Answering Process

Inform

An LEP person who places a phone call to the SEDA-COG office will, in all likelihood, be responding to an advertisement, website posting, or other announcement that solicits the call and provides notice about the availability of language assistance. In this case, the LEP person would be at least partially informed about the MPO's commitment to make information available in other languages. A more expansive explanation of the specific language services provided and the expectations for how they are provided would be communicated after the language of the LEP person is identified and interpretation services are initiated.

Identify

The LEP person may not self-identify his or her preferred language, and the person taking the call may not be able to identify the language without help. In either case, assistance in identifying a caller's language can be handled via the telephone-based interpretation service.

Interact

In all likelihood, the SEDA-COG receptionist will be the first contact point. Each reception staff person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion. Most interaction with the LEP person will occur with the interpreter's help. The receptionist may also transfer the call to the SEDA-COG MPO staff.

SEDA-COG is able to request account usage breakdowns from LinguaLinx for the telephone interpretation service. The data can be used to monitor the types and frequency of languages interpreted on behalf of SEDA-COG departments. To date, the MPO staff have not needed to use the service. However, between 2018 and 2021, there were eight telephone interpretation events (all for the Spanish language) completed on behalf of the SEDA-COG Administration and Weatherization departments.

Instruct

Training for the SEDA-COG reception staff and the SEDA-COG MPO staff will address the following:

- Identifying LEP Persons – Training will focus on the process and expectations for how the telephone-based interpretation service will identify the LEP person's language.
- Interacting with LEP Persons – Staff will be informed about the credentials and access process for the telephone-based interpretation service. Instruction will also include general principles on interacting with an LEP person and the interpreter. Instruction about the telephone system features and process necessary to transfer the conference call to another person should be given to both reception staff and MPO staff.

Webpage

The SEDA-COG MPO's site address on the SEDA-COG website is: www.seda-cog.org/departments/ transportation/seda-cog-metropolitan-planning-organization. The site provides a platform for disseminating information about MPO meetings, plans and programs, upcoming activities, and receiving input through a comment page. Contact with the SEDA-COG MPO through its

website portal is one of the more likely contact points used by LEP persons, for many of the same reasons that non-LEP persons seek out a webpage. Information and answers to questions may be handled on a self-serve basis, which is typically more comfortable for most persons who are savvy with the Internet and computer technology. There is much information already on the SEDA-COG MPO webpage that may be readily accessed. Beyond this, for an LEP person, looking up a webpage is far less intimidating than telephone or in-person contact.

Webpage	
Inform	Webpage notice
Identify	Self-Identify
Interact	Translate Tools
Instruct	Web Standards/Protocol

SEDA-COG has embedded translate features on the entire website. In addition, certain human-translated "vital documents" (identified previously) are available on the website in Spanish.

Inform
Stating the availability of language assistance and language taglines (**Appendix H**) will be integrated into the SEDA-COG MPO webpage.

Identify
Use of the SEDA-COG MPO webpage would be self-directed, therefore identification of the LEP person would be accomplished through the user's selection of language through the Translate tool.

Interact
When an LEP Person accesses the webpage, interaction occurs according to the user's preferences and access of the posted information. Translation of the webpage is automated, and interpersonal interaction is not expected. However, interactions with the webpage may be only an initial contact point, and may generate other contact points (phone call, walk-in, written correspondence, etc.).

Instruct
Minimal instruction of staff is required for the webpage contact point. Instead, the webpage design and ease of use may need to be optimized for use by LEP persons. Training of the IT staff may be necessary for successful Translate tool enhancements and being able to track how much the tool is used by website visitors.

Written Correspondence

Contact through written communication includes both paper and e-mail correspondence. Both contact points are likely with LEP persons, as these communication methods require minimal interpersonal interaction. Written correspondence may be very well-suited for certain purposes, such as identifying an issue of

Written Correspondence	
Inform	Notice of Services Available
Identify	Language ID tools
Interface	Website Translate tools Translation services
Instruct	Translation services Other translation tools

concern or providing specific comments on a plan or program. In other cases, written correspondence will serve as a starting point for additional contact, whether a phone call, face-to-face discussion, or a webpage visit.

Inform

Written correspondence may be the most accessible and well-advertised contact point for LEP persons, as most materials published by the SEDA-COG MPO include the office mailing address and an e-mail address. On the SEDA-COG website, the office address appears at the top of every page, with SEDA-COG's general e-mail address (information@seda-cog.org) on the Contact Us page. In addition, most persons—whether LEP or not—understand the concept of written correspondence and its usefulness for accessing information, providing comments/feedback, and asking questions.

Similar to those who make a phone call to the SEDA-COG office, an LEP person who provides written correspondence will, in all likelihood, be responding to an advertisement, website posting, or other announcement that solicits the call and provides notice about the availability of language assistance. In this case, the LEP person would be at least partially informed about the MPO's commitment to make information available in other languages.

Identify

Identifying the language of a hard copy written document may require the contracted help of a translation service. The paper copy or electronic scan (PDF or other image format) would be provided to the translation service provider, which would identify the language and translate the document into English. A listing of translation service providers, including webpage and contact phone numbers, is provided in **Appendix I**.

For e-mail or other written electronic correspondence, the contracted translation service may be used, or the "Detect language" function of Google Translate may be used to automatically detect the language. The electronic text would be copied into an automated translation tool (Google Translate, Bing Translator, etc.), which would detect the language, assuming that it is one that is supported by the tool. Even if the translation is not fully accurate, this method should be sufficient to identify the language. These instances would also be recorded in a log to maintain a list of these interactions.

Interact

Some, but not all, of the correspondence from LEP persons will require a response, which would be the primary point of interaction. If the correspondence is simply providing feedback or comment on a plan or program, a response would be optional. Regardless, the response would be prepared in English and then translated into the language spoken by the LEP person. Because an accurate translation would be desired, the contracted help of a translation service would be used to prepare the response. Google Translate may be used if the message is simple and an immediate response is needed. However, since it is based on automated routines (as opposed to human translation), it may not accurately communicate the message desired.

Instruct

Training for the written communication contact point would focus on the selection and use of the various translation tools. The training will introduce the Google Translate tool and its capabilities, along with examples. The process for accessing the contracted translation service and the expectations for turnaround of a translation would also be described.

LEP Plan Coordination & Staff Training

As part of the LAP, the SEDA-COG MPO has identified resources and tools that can be used in various contexts (i.e., contact points) to provide language assistance services. The resources and tools have been compiled into an *LEP Employee Resources Manual*, and staff expertise in using them will be developed through an LEP Employee Training Presentation. Steve Herman, the SEDA-COG MPO Transportation Program Director, has been designated as the Language Assistance Coordinator and will oversee the staff training activities.

LEP Employee Training Presentation

The Training Presentation has been prepared in Microsoft PowerPoint and includes two primary sections: 1) an overview of the LEP Plan, including the Four-Factor Analysis; and 2) an explanation of the tools and resources appropriated in the LAP. The presentation includes a hyperlink to an online 25- minute video presentation developed by the U.S. Department of Justice for laypersons who are learning about language access and assistance. With the video and a time for questions, the full training presentation can be completed in one hour.

LEP Employee Resources Manual

The manual is a compilation of the various resources and tools available to the SEDA-COG staff for providing language assistance. The manual is comprised of tools and resources that are found in the appendices of this LEP Plan Document. Versions of these materials are maintained in electronic (PDF) and paper copy. Each staff member who participates in the training presentation will receive a paper copy of the manual. Much of the material in the manual is self-explanatory and may be used for a variety of training formats:

- On its own for brief "crash course"
- With the guidance of a trained staff person for one-on-one training
- Alongside a copy of the training presentation for self-paced training

Paper copies of the manual will be maintained at the SEDA-COG receptionist's desk and at the welcome/ sign-in station at SEDA-COG MPO public meetings, so that the language assistance materials are available for quick reference in serving LEP persons.

Plan Evaluation Process

The LEP Plan serves as a component of the MPO's overarching Title VI Program document. As such, the LEP Plan will be updated or reviewed for update every three years, as part of the Title VI Program maintenance schedule. The LEP Plan and its Language Assistance Plan will be evaluated by interested staff or a committee assembled by the Language Assistance Coordinator, in compliance with current FHWA and FTA guidance. Records on the frequency of contact with LEP persons (Factor Two of the Four-Factor Analysis) would likely drive the need for an update of the LEP more so than the availability of new demographic data from the Census Bureau.

The following materials are provided in **Appendix K** for use in the LEP review process:

LEP Plan Self-Assessment Checklist

The LEP Plan Self-Assessment Checklist may be used as the overarching template for the assessment. The checklist provides a series of questions designed to encourage discussion and critical thinking about the success of interactions (if any) with LEP persons, the usefulness of the plan provisions and LAP, and the evolving nature/growth of LEP populations and their needs in the SEDA-COG MPO region.

LEP Interaction Tracking Form

The LEP Interaction Tracking Form has two components that are used in documenting interactions with LEP persons:

- The Record of Interactions collects information about each interaction with an LEP person. Each row represents an interaction. Multiple copies of this form may be used in a given year.
- The Annual Report Summary draws from the Record of Interactions and serves as a one-page, annual report of the information collected about LEP interactions.

The record and annual report are intended to inform certain questions asked in the self-assessment.

Suggested LEP Plan Performance Measures

A listing of Suggested LEP Plan Performance Measures is provided as a starting point for implementing a performance-based approach to evaluations of the LEP Plan. While FHWA and FTA generally encourage this approach, no formal rulemaking has been completed.

Sources

Federal Government's Renewed Commitment to Language Access Obligations under Executive Order 13166.
http://www.lep.gov/13166/AG_021711_EO_13166_Memo_to_Agencies_with_Supplement.pdf

Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA Circular 4702.1B)
Federal Transit Administration.
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Policy Guidance Concerning Recipients' Responsibilities to LEP Persons, U.S. Department of Transportation.
https://www.govinfo.gov/content/pkg/FR-2005-12-14/html/05-23972.htm

Overview of Title VI of the Civil Rights Act of 1964, U.S. Department of Justice.
https://www.justice.gov/crt/fcs/TitleVI-Overview

Appendices

Appendix A	Notification of Language Services (English and Spanish Versions)
Appendix B	Title VI Notice to Beneficiaries (English and Spanish Versions)
Appendix C	Title VI Complaint Form (English and Spanish Versions)
Appendix D	Title VI Complaint Procedures (English and Spanish Versions)
Appendix E	Language Identification Card Language Identification Survey
Appendix F	"One Moment Please" Tool
Appendix G	Telephone-Based Interpretation Service
Appendix H	Language Taglines
Appendix I	Human Translation & Interpretation Service Providers
Appendix J	Community & Agency Contacts
Appendix K	LEP Plan Self-Assessment Checklist LEP Interaction Tracking Form: Record of Interactions LEP Interaction Tracking Form: Annual Report

Appendix A: Notification of Language Services
(English and Spanish Versions)

Notice of Language Services

The SEDA-COG MPO provides language interpretation and document translation services upon request. If your preferred language is not English, please allow us to discover your preferred language and converse or correspond with you in that language. The following describes what you can expect when you interact with our staff.

In Person
If you are attending a meeting or visiting the SEDA-COG MPO office in person, please approach the welcome/sign-in station or reception desk and state your preferred language. If the person cannot understand your request, they will show you a Language Identification Card. Please point to your preferred language. The person helping you will ask you to wait a moment while a telephone-based interpretation service is contacted to assist in the conversation. Interpretation is available for many different languages and is provided free of charge. Please be patient while we bring the interpreter on the line.

By Phone
If you wish to call the SEDA-COG MPO, please call the main office number at (570) 524-4491 and request your preferred language. If the person answering your call cannot understand your request, they will ask you to wait a moment while a telephone-based interpretation service is contacted to assist in the conversation. Interpretation is available for many different languages and is provided free of charge. Please be patient while we discover your language and bring the interpreter on the line.

By Written Correspondence
When writing correspondence to the SEDA-COG MPO, please write in your preferred language. Address paper correspondence to SEDA-COG MPO, 201 Furnace Road, Lewisburg, PA 17837. Address e-mail correspondence to sherman@seda-cog.org. The MPO also provides a Comments Portal on its website at https://seda-cog.org/departments/transportation/transportation-comments. We will translate your correspondence and then provide a response (if feasible and appropriate) in your preferred language as well as English. Please allow up to 45 days for the written, translated response in your language.

Document Translations Available

The SEDA-COG MPO is committed to maintaining Spanish translations of vital documents, which encompass those that explain how to access the MPO's services (including language assistance services), notification of rights, and complaint forms. These translated documents are available in paper copy through the SEDA-COG MPO office, and they are also available online at the MPO's website: https://seda-cog.org/departments/transportation/seda-cog-metropolitan-planning-organization/

Notificación de Servicios de Idioma

El SEDA-COG MPO proporciona servicios de interpretación de idiomas y traducción de documentos bajo pedido. Si su idioma preferido no es el inglés, por favor permítanos descubrir su idioma preferido y conversar o corresponder con usted en este idioma. Lo siguiente describe lo que puede esperar cuando interactúa con nuestro personal.

En Persona
Si está atendiendo a una reunión o visita en la oficina de SEDA-COG MPO en persona, por favor acérquese a la Estación de Bienvenida/Registro o Recepción e indique su idioma preferido. Si la persona no entiende su pedido, él o ella le mostrarán la Tarjeta de Identificación de Idiomas. Por favor señale su idioma preferido. La persona que le está atendiendo le pedirá que espere un momento mientras localiza a un servicio de interpretación por teléfono para asistirle en la conversación. La interpretación está disponible para muchos idiomas distintos y está disponible para usted libre de cargo. Por favor tenga paciencia mientras traemos al intérprete a la línea.

Por Teléfono
Si desea llamar a SEDA-COG MPO, por favor llame al número de la oficina principal al (570) 524-4491 y solicite su idioma preferido. Si la persona que está atendiendo la llamada no le entiende, él o ella le pedirán que espere un momento mientras localiza a un servicio de interpretación por teléfono para asistirle en la conversación. La interpretación está disponible para muchos idiomas distintos y está disponible para usted libre de cargo. Por favor tenga paciencia mientras traemos al intérprete a la línea.

Por Medio de Correspondencia Escrita
Cuando está escribiendo una correspondencia a SEDA-COG MPO, por favor indique en ella su idioma preferido. Envíe su correspondencia escrita a SEDA-COG MPO, 201 Furnace Road, Lewisburg, PA 17837.Envíe su correspondencia por correo electrónico a sherman@seda-cog.org. La MPO también tiene a su disposición el Portal de Comentarios en su página web https://seda-cog.org/departments/transportation/transportation-comments. Traduciremos su correspondencia y proporcionaremos una respuesta (en caso que es factible y apropiado) en su idioma preferido, como también en inglés. Por favor permítanos un periodo de hasta 45 días para tramitar su correspondencia escrita y traducida a su idioma.

Traducción de Documentos Disponible

El SEDA-COG MPO está comprometido a mantener traducciones en español de documentos vitales, los cuales incluyen a los que explican cómo acceder a los servicios de MPO (inclusive servicios de asistencia de idiomas), formularios de querellas, y notificaciones de derechos. Estos documentos traducidos están disponibles en copia impresa en la oficina de SEDA-COG MPO, y muchos están disponibles también en línea en la página web de MPO (https://seda-cog.org/departments/transportation/seda-cog-metropolitan-planning-organization/).

Appendix B: Title VI Notice to Beneficiaries
(English and Spanish Versions)

Title VI Notice to Beneficiaries
(English)

SEDA-COG METROPOLITAN PLANNING ORGANIZATION (MPO)
TITLE VI NOTICE TO THE PUBLIC

The SEDA-COG Metropolitan Planning Organization (MPO) hereby gives notice that it is the policy of the SEDA-COG MPO to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by the SEDA-COG MPO.

Any person who believes they have been aggrieved by a discriminatory practice under Title VI has a right to file a formal complaint with the SEDA-COG MPO. Any such complaint must be in writing and filed with the SEDA-COG MPO's Title VI Compliance Officer within 180 days following the date of the alleged discriminatory occurrence. A Title VI Discrimination Complaint Form can be obtained from the SEDA-COG MPO by calling (570) 524-4491 or by linking to the MPO's Discrimination Complaint Form.

This notice is posted at SEDA-COG's office (physical address shown below) and on the SEDA-COG website. For more information on the SEDA-COG MPO's Title VI Program or the procedures to file a complaint, please contact:

> Steve Herman
> Title VI Compliance Officer
> SEDA-COG MPO
> 201 Furnace Road
> Lewisburg, PA 17837
> (570) 524-4491
> sherman@seda-cog.org
> www.seda-cog.org

If information is needed in another language, call 570-524-4491 (TTY: 711) to learn about language assistance services.

Title VI Notice to Beneficiaries
(Spanish)

SEDA-COG ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (MPO)
NOTIFICACIÓN DE PROTECCIONES AL PÚBLICO DE DERECHOS BAJO TÍTULO VI
Y INSTRUCCIONES PARA PRESENTAR UNA QUEJA

SEDA COG MPO está comprometida asegurar que ninguna persona sea excluida de participar en sus servicios de tránsito o negada los beneficios de sus servicios de tránsito sobre la base de raza, color, u origen nacional.

Cualquier persona que cree que ha sido agraviada por una práctica discriminatoria y ilegal bajo Título VI puede presentar una queja. Todas las quejas recibidas están documentadas y asignadas a los empleados apropriados para investigación.

Para más información sobre el programa de derechos civiles de Título VI y los procedimientos para presentar una queja, o para obtener más información en una otra idioma, por favor póngase en contacto con:

Steve Herman
Title VI Compliance Officer
SEDA-COG MPO
201 Furnace Road
Lewisburg, PA 17837
(570) 524-4491
sherman@seda-cog.org
www.seda-cog.org

Después de procesar la queja una respuesta (si pedida) será mandada a la persona presentando la queja y acción correctiva será realizada.

La querellante puede presenter una queja directamente a la Administración de Carreteras Federal por mandar la queja a la Especialista de Oportunidad Igual, U.S. Department of Transportation, Federal Highway Administration, 228 Walnut Street, Room 508, Harrisburg, PA 17104-2515.

Appendix C: Title VI Complaint Form
(English and Spanish Versions)

SEDA-COG Metropolitan Planning Organization (MPO)
Title VI Complaint Form
(English)

Name	Phone	Name of Person(s) That Discriminated Against You
Address (Street No., P.O. Box, etc.)		Location and Position of Person (If Known)
City, State, Zip		City, State, Zip

Discrimination Because of:	Date(s) of Alleged Incident(s)
☐ Race/Color* ☐ Sex ☐ Disability** ☐ Age ☐ National Origin* ☐ Retaliation ☐ Religion	

Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also, attach any written material pertaining to your case.

Signature	Date

Please submit this form to one of the following agencies:

SEDA-COG Metropolitan Planning Organization	Pennsylvania Department of Transportation	Federal Highway Administration	U.S. Department of Justice
Title VI Compliance Officer	*Bureau of Equal Opportunity*	*Equal Opportunity Specialist*	*Office of Justice Programs*
201 Furnace Road Lewisburg, PA 17837 Phone: (570) 524-4491	P.O. Box 3251 Harrisburg, PA 17105-3251 Phone: (800) 468-4201	Pennsylvania Division Office 228 Walnut Street, Room 508 Harrisburg, PA 17101-1720	Office for Civil Rights 810 7th Street, NW Washington, DC 20531
Email: information@seda-cog.org	Email: penndoteoreports@pa.gov	Phone: (717) 221-3705	Phone: (202) 307-0690 Phone (TDD): 202-307-2027

*indicates is specific to Title VI of the Civil Rights Act of 1964.   **indicates is specific to Americans with Disabilities Act of 1990.

SEDA-COG Metropolitan Planning Organization (MPO)
Title VI Complaint Form
(Spanish)

FORMULARIO DE DENUNCIA POR DISCRIMINACIÓN

Nombre	Teléfono	Nombre de la(s) persona(s) que lo discriminaron
Dirección (Número de calle, apartado de correos, etc.)		Ubicación y posición de la persona (si se conoce)
Ciudad, Estado, Código Postal		Ciudad, Estado, Código Postal

Discriminación por: ☐ Raza/Color* ☐ Sexo ☐ **Discapacidad** ** ☐ Años ☐ Origen nacional* ☐ Represalias ☐ Religión	Fecha(s) del incidente(s) alegado(s)

Explique lo más breve y claramente posible lo que sucedió y cómo fue discriminado. Indique quién estuvo involucrado. Asegúrese de incluir cómo otras personas fueron tratadas de manera diferente a usted. Además, adjunte cualquier material escrito relacionado con su caso.

Firma	Fecha

Envíe este formulario a una de las siguientes agencias:

SEDA-COG Organización de Planificación Metropolitana	**Departamento de Transporte de Pensilvania**	**Administración Federal de Carreteras**	**Departamento de Justicia de EE. UU.**
Oficial de Cumplimiento del Título VI	*Oficina de Igualdad de Oportunidades*	*Especialista en Igualdad de Oportunidades*	*Programas de la Oficina de Justicia*
201 Furnace Road Lewisburg, PA 17837 Phone: (570) 524-4491	P.O. Box 3251 Harrisburg, PA 17105-3251 Phone: (800) 468-4201	Pennsylvania Division Office 228 Walnut Street, Room 508 Harrisburg, PA 17101-1720	Office for Civil Rights 810 7th Street, NW Washington, DC 20531
Correo electrónico: information@seda-cog.org	Correo electrónico: penndoteoreports@pa.gov	Teléfono: (717) 221-3705	Teléfono: (202) 307-0690 Teléfono (TDD): 202-307-2027

*indica es específico al Título VI de la Ley de Derechos Civiles de 1964 **indica que es específico de la Ley de Estadounidenses con Discapacidades de 1990.

Appendix D: Title VI Complaint Procedures
(English and Spanish Versions)

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. Although only race, color, and national origin are covered under Title VI, other federal and Pennsylvania civil rights laws require the MPO to address complaints based on broader protected classes such as age, sex, creed, and disability, employing the same or comparable practices to address disparate treatment and disparate impact allegations. Any person, who believes that they or any specific class of persons has been subjected to discrimination or retaliation prohibited by Title VI and other nondiscrimination provisions, may file a written complaint. The complaint may be filed by the affected individual or a representative and must be in writing. A complaint must be filed no later than 180 days after the following:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination; or
- Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

1. Complaints shall be in writing and signed by the Complainant or the Complainant's representative. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by phone can be reduced to writing as an accommodation upon request and provided to the complainant for confirmation or revision and signature before processing. Complainants can also use the MPO's Title VI Complaint Form available on the SEDA-COG website.

2. Generally, the written complaint should include the following information:

   a. Name, address, and telephone number of the Complainant.
   b. Basis of the complaint (e.g., race, color, national origin, sex, age, disability or retaliation).
   c. A detailed description of the circumstances of the incident that lead the Complainant to believe discrimination occurred.
   d. Name, title, and address of the person(s) who discriminated against the Complainant.
   e. Name, address, and phone number of any person(s) who may have knowledge of the alleged incident or are perceived as parties in the complained-of-incident.
   f. Date or dates on which the alleged discrimination occurred.
   g. Other agencies where the complaint was filed.

3. If the MPO receives a complaint, the Title VI Compliance Officer will acknowledge receipt of the complaint by notifying the Complainant within 10 business days and transmitting the complaint to the proper federal or state agency (e.g., Federal Highway Administration, Federal Transit Administration, or PennDOT) for investigation and disposition pursuant to that agency's Title VI complaint procedures.

4. Although these procedures do not preclude the MPO from attempting to informally resolve complaints, the decision to resolve informally always rests with the Complainant, who may withdraw from the informal process at any time.

5. These procedures apply to all external complaints about discrimination on the basis of race, color, national origin (including limited English proficiency), age, sex, religious creed, or disability related to any program or activity administered by the MPO and/or its subrecipients, consultants, and contractors, filed under Title VI (including its Disadvantaged Business Enterprise and Equal Employment Opportunity components), as well as other related laws including, but not limited to, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disability Act of 1990.

6. The MPO Title VI Compliance Officer will maintain a log of all complaints received by the MPO.

Title VI complaints may be submitted to any of the following agencies:

SEDA-COG Metropolitan Planning Organization
Title VI Compliance Officer
201 Furnace Road
Lewisburg, PA 17837
information@seda-cog.org

Pennsylvania Department of Transportation
Bureau of Equal Opportunity
PO Box 3251
Harrisburg, PA 17105-3251
penndoteoreports@pa.gov

Federal Highway Administration
Equal Opportunity Specialist
Pennsylvania Division Office
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590

Federal Transit Administration, Region III
Civil Rights Officer
1835 Market Street, Suite 1910
Philadelphia, PA 19103-2932

U.S. Department of Transportation
Departmental Office of Civil Rights
1200 New Jersey Ave, SE
Washington, DC 20590

U.S. Department of Justice
Office for Civil Rights
810 7th Street, NW
Washington, D.C. 20531

SEDA-COG ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (MPO)
Título VI Procedimiento de Queja

El Título VI de la Ley de Derechos Civiles de 1964 prohíbe la discriminación por motivos de raza, color o origen nacional. Aunque solo la raza, el color y el origen nacional están cubiertos por el Título VI, otras leyes federales y de derechos civiles de Pensilvania requieren que la MPO aborde las quejas basadas en clases protegidas más amplias, como la edad, el sexo, el credo y la discapacidad, empleando las mismas prácticas o prácticas comparables, para abordar las alegaciones de trato dispar y de impacto dispar. Cualquier persona que crea que ella o cualquier clase específica de personas ha sido objeto de discriminación o represalias prohibidas por el Título VI y otras disposiciones contra la discriminación, puede presentar una queja por escrito. La denuncia podrá ser interpuesta por el afectado o por un representante y deberá constar por escrito. Una queja debe presentarse a más tardar 180 días después de la siguiente:

- La fecha del presunto acto de discriminación; o
- La fecha en que la(s) persona(s) se dieron cuenta de la supuesta discriminación; o
- Cuando ha habido un curso continuo de conducta, la fecha en que se interrumpió esa conducta o la última instancia de la conducta.

1. Las quejas deberán ser por escrito y firmadas por el Demandante o el representante del Demandante. Las quejas recibidas por fax o correo electrónico serán reconocidas y procesadas. Las denuncias recibidas por teléfono pueden reducirse a escribir como una adaptación a pedido y entregarse al denunciante para su confirmación o revisión y firma antes del procesamiento. Los denunciantes también pueden usar el formulario de denuncia del Título VI de la MPO disponible en el sitio web de SEDA-COG.

2. En general, la queja por escrito debe incluir la siguiente información:

   a. Nombre, dirección y número de teléfono del denunciante.
   b. Base de la denuncia (p. ej., raza, color, origen nacional, sexo, edad, discapacidad o represalia).
   c. Una descripción detallada de las circunstancias del incidente que llevan al Demandante a creer que ocurrió discriminación.
   d. Nombre, cargo y dirección de la(s) persona(s) que discriminaron al denunciante.
   e. Nombre, dirección y número de teléfono de cualquier persona que pueda tener conocimiento del presunto incidente o que se perciba como parte del incidente denunciado.
   f. Fecha o fechas en que ocurrió la supuesta discriminación.
   g. Otras agencias donde se presentó la denuncia.

3. Si la MPO recibe una queja, el Oficial de Cumplimiento del Título VI acusará recibo de la queja notificando al Demandante dentro de los 10 días hábiles y transmitiendo la queja a la agencia federal o estatal correspondiente (por ejemplo, Administración Federal de Carreteras,

Administración Federal de Tránsito o PennDOT) para su investigación y disposición de conformidad con los procedimientos de denuncia del Título VI de esa agencia.

4. Aunque estos procedimientos no impiden que la MPO intente resolver las quejas de manera informal, la decisión de resolverlas de manera informal siempre recae en el Demandante, quien puede retirarse del proceso informal en cualquier momento.

5. Estos procedimientos se aplican a todas las quejas externas sobre discriminación por motivos de raza, color, origen nacional (incluido el dominio limitado del inglés), edad, sexo, credo religioso o discapacidad relacionada con cualquier programa o actividad administrada por la MPO y/o sus beneficiarios. , consultores y contratistas, presentados bajo el Título VI (incluidos sus componentes de Empresas Comerciales en Desventaja e Igualdad de Oportunidades en el Empleo), así como otras leyes relacionadas que incluyen, entre otras, la Sección 504 de la Ley de Rehabilitación de 1973, la Ley de Restauración de los Derechos Civiles de 1987, y la Ley de Estadounidenses con Discapacidades de 1990.

6. El Oficial de Cumplimiento del Título VI de la MPO mantendrá un registro de todas las quejas recibidas por la MPO.

Las quejas del Título VI pueden presentarse a cualquiera de las siguientes agencias:

SEDA-COG Metropolitan Planning Organization
Oficial de Cumplimiento del Título VI
201 Furnace Road
Lewisburg, PA 17837
information@seda-cog.org

Departamento de Transporte de Pensilvania
Oficina de Igualdad de Oportunidades
PO Box 3251
Harrisburg, PA 17105-3251
penndoteoreports@pa.gov

Administración Federal de Carreteras
Especialista en Igualdad de Oportunidades
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Administración Federal de carreteras
Departamento de Transporte de Estados Unidos
Oficina de Derechos Civiles
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590

Administración Federal de Tránsito
Oficial de Derechos Civiles
1835 Market Street, Suite 1910
Philadelphia, PA 19103-2932

Departamento de Transporte de Estados Unidos
Oficina Departamental de Derechos Civiles
1200 New Jersey Ave, SE
Washington, DC 20590

Departamento de Justicia de EE. UU.
Oficina de Derechos Civiles
810 7th Street, NW
Washington, D.C. 20531

Appendix E: Language Identification Card & Language Identification Survey

Language Identification Card

Language Identification Survey

☐	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
☐	Մնորում եևք Նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
☐	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
☐	ឈ្មបបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
☐	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
☐	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
☐	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
☐	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
☐	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
☐	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
☐	Mark this box if you read or speak English.	11. English
☐	اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi

Language Identification Survey (continued)

☐ Cocher ici si vous lisez ou parlez le français.	13. French
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
☐ Marchi questa casella se legge o parla italiano.	21. Italian
☐ 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
☐ ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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Language Identification Survey (continued)

☐	Assinale este quadrado se você lê ou fala português.	26. Portuguese
☐	Însemnaţi această căsuţă dacă citiţi sau vorbiţi româneşte.	27. Romanian
☐	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
☐	Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
☐	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
☐	Marque esta casilla si lee o habla español.	31. Spanish
☐	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
☐	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
☐	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
☐	Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
☐	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگا ئیں۔	36. Urdu
☐	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
☐	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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Appendix F: "One Moment Please" Tool

propio language services

"One Moment Please" Tool

How to Say "One Moment Please" in Eighteen Common Languages

Language:	Written in Language	Phonetic Pronunciation
Albanian:	Nje minutë ju lutem.	nee-yeh mee-noo-teh you loo-tem
Arabic:	دقيقة من فضلك	dakika meen fahdlock (masculine) dakika meen fahdlick (feminine)
Chinese:	請稍候	ching show hoe
French:	Un moment s'il vous plaît.	uhn moe-mon seal-voo-play
German:	Einen Moment bitte.	eye-nen moment bee-teh
Gujarati:	મેહરબાની કરીને એક પળ થોભશો	meherbani kariné ek pul thobso
Haitian Creole:	Tanpri tann yon ti moman.	tan-pree tan yaw tee moe-maw
Hindi:	कृपया एक पल प्रतीक्षा करें	kreepya ek pal prateeksha karen
Italian:	Un momento per favore.	oon moe-mento pair fah-vore-ay
Japanese:	少々お待ちください。	shosho omachi kudasai
Korean:	잠깐 기다리세요	jam-kan ki-da-ri-se-yo
Polish:	Moment, proszę.	moment prosheh
Portuguese:	Um momento, por favor.	um moe-mento, poor fah-vor
Russian:	Подождите, пожалуйста.	padazhdite, pazhalusta
Spanish:	Un momento por favor.	oon moe-mento poor fah-vor
Swahili:	Subiri kidogo	soo-bee-re key-dough-go
Tamil:	தயவு செய்து ஒரு நிமிடம்	dye-ya-vu seydu oru nimi-dom
Vietnamese:	Xin chờ một chút	sin char moe-chew

Appendix G: Telephone-Based Interpretation Service

Telephone-Based Interpretation Service
Access Instructions

Non-English Speaking
Caller-In Procedure

- Upon answering the phone and determining the caller-in non-English-speaking, advise "Please hold a moment, I will call an interpreter. What language do you speak?" (Most non-English speaking persons will understand this simple message.)
- Switch phone to "night," place caller on hold.
- Call LinguaLinx on speaker phone (1-877-764-8111) to request an interpreter.
- Provide the call center representative with account number and language(s) needed.
- Press More Button, Conference.
- All callers will then be conferenced together.

Non-English Speaking
Visitor Procedure

- When approached by a non-English speaking visitor, shake your head "No," while holding up your index finger (indicating you do not understand, wait a moment).
- Offer "Point to your language" LinguaLinx card (which explains we do not understand, please point to your language and I will call an interpreter).
- Place phones on "night."
- Call LinguaLinx on speaker phone (1-877-764-8111) to request an interpreter.
- Provide the call center representative with account number and language(s) needed.
- Follow the interpreter's directions.

Telephone-Based Interpretation Service
Tips for Working with an Over-the-Phone Interpreter

TIPS
for working with an interpreter

- Interpretation is "consecutive." This means there are pauses while the interpreter repeats each statement in the respective language.

- Speak in the "FIRST PERSON" as you would in 'normal' conversation (e.g. "Do you have a fever?" instead of, "Ask her if she has a fever, please.") The interpreter is expected to interpret exactly as you state it.

- Be prepared to explain some things in more detail for the interpreter. Some terminology, concepts and cultural expressions may not have an equivalent in the target language and may need to be clarified.

- Control the flow of the conversation. Please remember the interpreter is only there to interpret. Treat the appointment as if you were providing direct service to an English speaking client.

- Ask the interpreter and the LEP client questions to ensure they understand what you want to communicate.

- Avoid asking the interpreter for his/her opinion about the situation being interpreted.

- Your interpreter should not have a side conversation with you or the client. He or she must relay everything that is said back to you or your client.

- Your interpreter should not discuss anything unrelated to the interpretation assignment.

- Follow up by providing us with feedback about your interpretation services.

www.lingualinx.com
www.facebook.com/LinguaLinxInc/

Appendix H: Language Taglines

Language Taglines

English

ATTENTION: If you speak another language, language assistance is available to you FREE OF CHARGE. Call 570-524-4491 (TTY: 711)

Español

Atención: Si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 570-524-4491 (TTY: 711)

中文

注意：如果您講廣東話或普通話， 您可以免費獲得語言援助服務。請致電 570-524-4491（TTY：711）

Tiếng Việt

CHÚ Ý: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số 570-524-4491 (TTY: 711)

한국어

주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. 570-524-4491 (TTY: 711) 번으로 전화해 주십시오.

Deutsche

ACHTUNG: Wenn Sie Deutsch sprechen, erhalten Sie kostenlose sprachliche Unterstützungsdienste. Telefonnummer 570-524-4491 (TTY: 711).

Appendix I: Human Translation & Interpretation Service Providers

Translation & Interpretation Service Providers

Local Services

> Susquehanna University
>   Department of Languages, Literatures and Cultures
>   Phone: (570) 372-4693

> Bucknell University
>   Spanish Department
>   Phone: (570) 577- 577-1081

> Bloomsburg University
>   Languages and Cultures Department
>   Phone: (570) 389-4750

> Ron Radzai Translations
>   1400 Taylorsville Road
>   Ashland, PA 17921
>   Phone: (570) 875-1770

> Lisa Perrone (Italian)
>   437 James Road
>   Lewisburg, PA 17837
>   Phone: (570) 522-5075

National and International Language Services

Current SEDA-COG Provider:

> LinguaLinx
>   https://www.lingualinx.com/

Current PennDOT Provider:

> Propio Language Services
>   https://propio-ls.com/

Web-Based National & International Providers:

> inWhatLanguage
>   https://www.inwhatlanguage.com/

> Straker Translations
>   https://www.strakertranslations.com/

> Net-Translations
>   https://net-translations.com/en/home/

West Germanic - Interpretation

> Thomas Eshleman, Pastor
> Joyce Shenk, Administrative Assistant
> Groffdale Mennonite Church
> Phone: (717) 656-6388

Appendix J: Community & Agency Contacts

Community & Agency Contacts

West Germanic – Community and Agency Contacts

> - Mark Colussy
>   Mifflin County Planning Office
>   Phone: (717) 242-0887
>   E-mail: mcolussy@mifflinco.org
>
> - Betty Hartzler
>   Mennonite Heritage Center
>   Phone: (717) 935-5574
>   E-mail: hartzlerkb@gmail.com
>
> - Kay Gray
>   Penns Valley Area Historical Museum
>   Phone: (814) 349-5740
>   E-mail: gkay4875@gmail.com
>
> - Katie de Silva
>   Clinton County Planning Office
>   Phone: (570) 893-4080
>   E-mail: kdesilva@clintoncountypa.com
>
> - Shawn McLaughlin
>   Union County Planning Office
>   Phone: (570) 524-3840
>   E-mail: smclaughlin@unionco.org

Spanish – Community Contacts

> - Christopher Donahue, Chairperson
>   Department of Languages and Cultures
>   Bloomsburg University
>   Bloomsburg, PA
>   Phone: (570) 389-4714
>   E-mail: cdonahue@bloomu.edu

Spanish – Church Contacts

> - United Pentecostal Church
>   (Iglesia Pentecostal Unida)
>   Lewisburg, PA
>   Phone: (570) 524-5445
>   E-mail: info@upclewisburg.com
>   Web: http://www.upclewisburg.com/

> Saint Jude Thaddeus Parish
  Mifflintown, PA
  Phone: (717) 436-6722
  E-mail: frweary@stjudemifflintown.org
  Web: http://www.stjudemifflintown.org/

> Saint Joseph Church
  Milton, PA
  Phone: (570) 742-4356
  E-mail: stjoemilton@verizon.net
  Web: http://www.stjosephmilton.org/

> Immaculate Conception of the Blessed Virgin Mary
  Berwick, PA
  Phone: (570) 759-8113
  E-mail: ImmaculateConceptionBVMParishBerwick@hbgdiocese.org
  Web: https://stmarysberwick.com/

Appendix K:
Limited English Proficiency Plan Self-Assessment Checklist;
LEP Interaction Tracking Form: Record of Interactions;
LEP Interaction Tracking Form: Annual Report

SEDA-COG Metropolitan Planning Organization (MPO)
Limited English Proficiency Plan Self-Assessment Checklist

LEP Plan Status	
Is SEDA-COG MPO receiving federal funding?	☐ Yes ☐ No
Date of the most recent LEP Plan/LAP:	
Date of most recent Four-Factor Analysis:	
Date(s) of demographic data:	
Is an update to the current LEP Plan/LAP needed?	☐ Yes ☐ No

Interactions with LEP Persons		
Has SEDA-COG MPO interacted with any LEP persons during the past year?	☐ Yes ☐ No	
If so, how many interactions with LEP persons were recorded?	At public meetings	
	Office walk-in	
	Telephone call	
	Written correspondence	
	Webpage (e.g., Unique Google Translate users)	

Identifying LEP Communities	
Does SEDA-COG MPO have a process for collecting data on the number of LEP persons in the service area and the languages most commonly spoken?	☐ Yes ☐ No
How often is the language data for SEDA-COG MPO's service area analyzed?	**Once every _____ years.**
What techniques and resources are used by SEDA-COG MPO to identify LEP communities? (e.g., spatial mapping, community input, etc.)	**Describe: _____** _____ _____ _____ _____

Limited English Proficiency Plan Self-Assessment Checklist
(Continued)

Identifying LEP Communities (continued)	
What data does SEDA-COG MPO use for identifying LEP communities and the languages most commonly spoken?	**Describe:** _____ _____ _____ _____ _____

SAFE HARBOR POPULATIONS

In the most recent Four-Factor Analysis, what language group(s) **DID** meet the Safe Harbor Thresholds? Please list the LEP population, the percentage of the total service area population, and whether the population is increasing or decreasing vs. the previous Four-Factor Analysis.

Language	LEP Population	% of Total Population	☐ Increasing ☐ Decreasing
1.			
2.			
3.			
4.			
5.			

OTHER POPULATIONS

In the most recent Four-Factor Analysis, what language group(s) **DID NOT** meet the Safe Harbor Thresholds? Please list the LEP population, the percentage of the total service area population, and whether the population is increasing or decreasing vs. the previous Four-Factor Analysis.

Language	LEP Population	% of Total Population	☐ Increasing ☐ Decreasing
1.			
2.			
3.			
4.			
5.			

Limited English Proficiency Plan Self-Assessment Checklist
(Continued)

Providing Notice of Language Assistance	
How does SEDA-COG MPO inform the public about the availability of language assistance services? (e.g., posters, website, etc.)?	**Describe:** _____ _____ _____
In what language(s) does SEDA-COG MPO advertise language assistance services?	1. _____ 2. _____ 3. _____

Providing Language Assistance	
For the Safe Harbor LEP populations, what vital documents are translated?	1. _____ 2. _____ 3. _____ 4. _____ 5. _____
Does SEDA-COG MPO offer automated translation services on its website?	☐ Yes ☐ No
If so, what services are currently in use?	☐ Google Translate ☐ Bing Translator ☐ Other: _____ ☐ Other: _____
What are the top three (3) languages for which translation are most requested?	1. _____ 2. _____ 3. _____

Training & Staff Resources	
How does SEDA-COG MPO train staff for interacting with LEP persons? (e.g., identify language spoken, handle translation requests, access interpretation services)	**Describe:** _____ _____ _____ _____ _____ _____

Monitoring and Updating the Language Assistance Plan	
Is the LEP Plan, including the LAP, available to the public for review?	☐ Yes ☐ No
If yes, where is it available?	**Describe:** _____ _____ _____ _____
How often is the LAP updated (i.e., annually, biennially, etc.)?	☐ Annually ☐ Biennially ☐ Every 3 years ☐ Every 4 years ☐ Every 5 years ☐ Every _____ years
When was the LAP last updated?	**Date:** _____

LEP Interaction Tracking Form Record of Interactions

Year: _____ Page _____ of _____

Interaction Tracking (*to be filled out after each interaction with an LEP Individual*)							
No.	Date of Interaction	Name of LEP Individual	Location of Interaction	Language Spoken by LEP Individual	Service requested by LEP Individual	LEP Tools Used	Successful Interaction Y / N

LEP Interaction Tracking Form
Annual Report Summary

Year: _____

Interactions Summary			
Total Interactions	**Successful Interactions**	**Unsuccessful Interactions**	**Top Interaction Location**

Language Summary	
Language	**Number of Times Requested**

Services / Requests Summary	
Services most frequently requested …	
Plans or programs most frequently addressed …	