



# **SEDA-COG MPO**

## **Limited English Proficiency Plan**

**Prepared for:**

**SEDA-COG MPO**  
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## Background

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In 1964, John F. Kennedy called for the enactment of Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, and national origin in 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

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The 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 and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come into contact with the program, activity, or service provided.
3. The nature and importance of the program, activity, or service provided by the program to LEP persons.
4. The resources available to the recipient and costs associated with providing meaningful access to LEP persons.

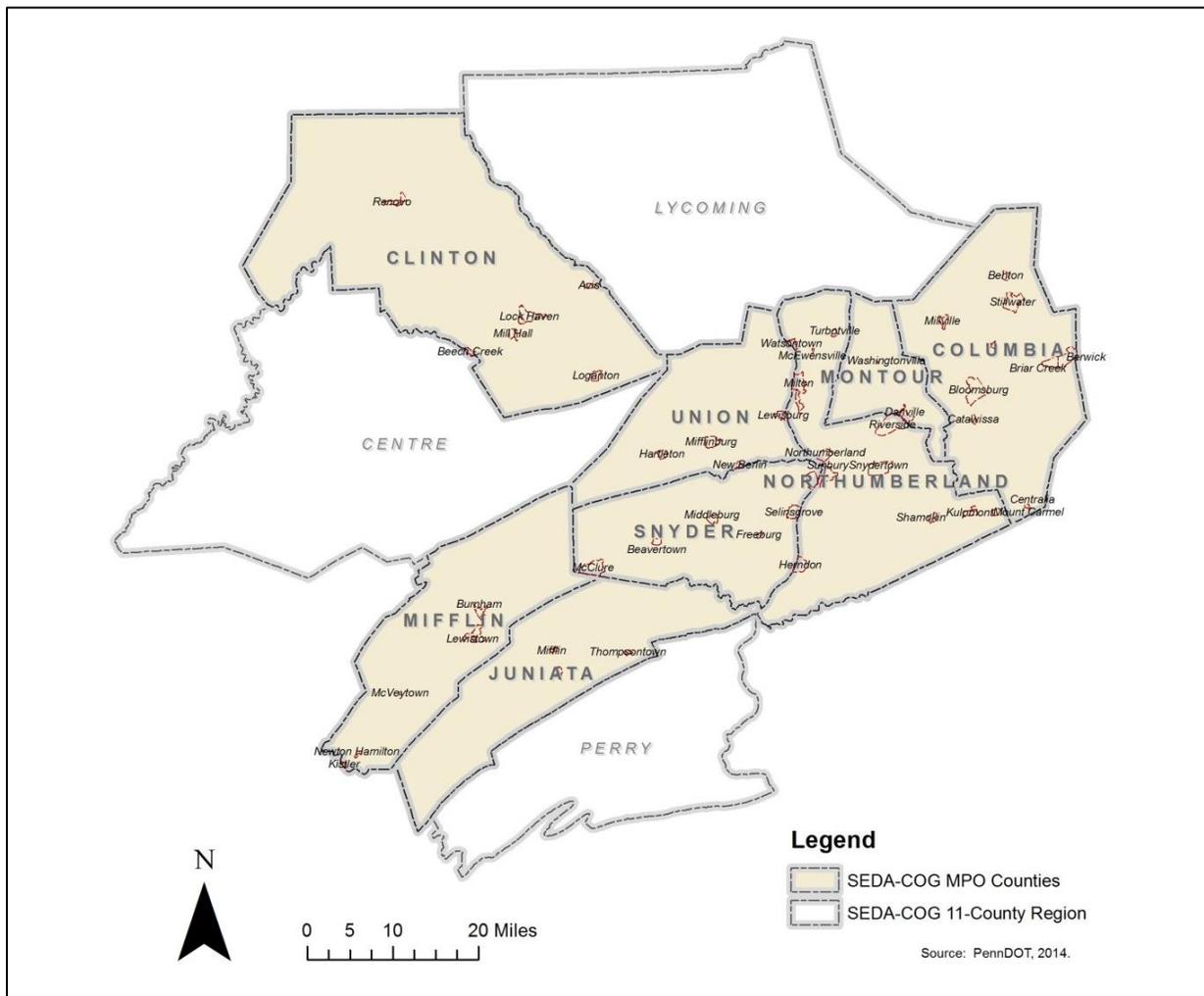
An interview was conducted with the SEDA-COG MPO staff to document the MPO’s current language-assistance services, degree of contact with LEP persons, resources available for language assistance, and other point of evaluation requested in the Four Factor Analysis. A summary of the questions asked and responses is provided in **Appendix A**.



## Factor I – Number & Proportion of LEP Persons Encountered

Factor 1 evaluates the number of LEP persons served and 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 (8) 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 2007-2011 American Community Survey (ACS) data. The data for “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” (Table B16001) 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.<sup>1</sup> 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 8,200 persons or 2.3% 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
<b>Total Population</b>	353,573		11,933,062	
<b>Total LEP Population All Language Groups <i>Speak English less than "very well"</i></b>	8,236	2.3%	453,258	3.8%

**Source:** U.S. Census Bureau: American Community Survey (2007-2011), 5 Year Estimates.

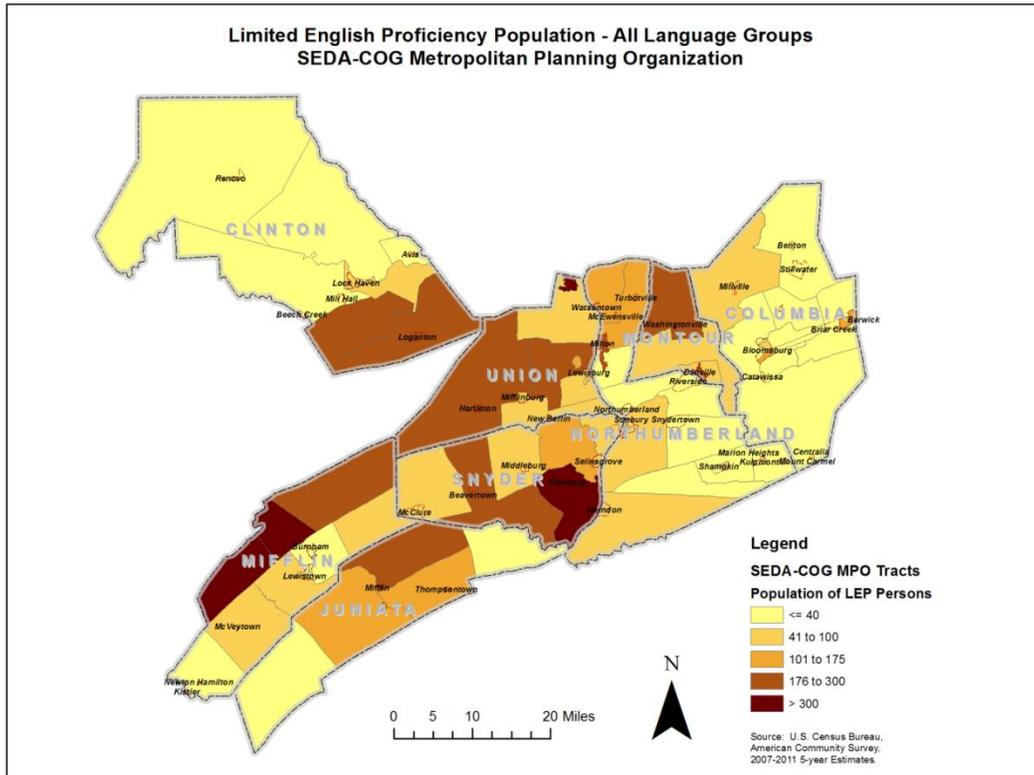
**Figure 2** illustrates the population of LEP persons in each Census tract. **Figure 3** illustrates the concentration (percentage of the total population) of LEP persons. The LEP populations are generally higher in the western and southern parts of the MPO, with the highest in Mifflin, Snyder, Union, and Northumberland Counties (see **Table 3**). LEP concentrations follow a similar pattern, with Mifflin, Union, and Snyder Counties having the highest concentrations.<sup>2</sup> Northumberland County’s larger total population results in a low LEP concentration. By the same token, the lower total populations of Montour and Juniata Counties result in higher LEP concentrations.

<sup>1</sup> 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.

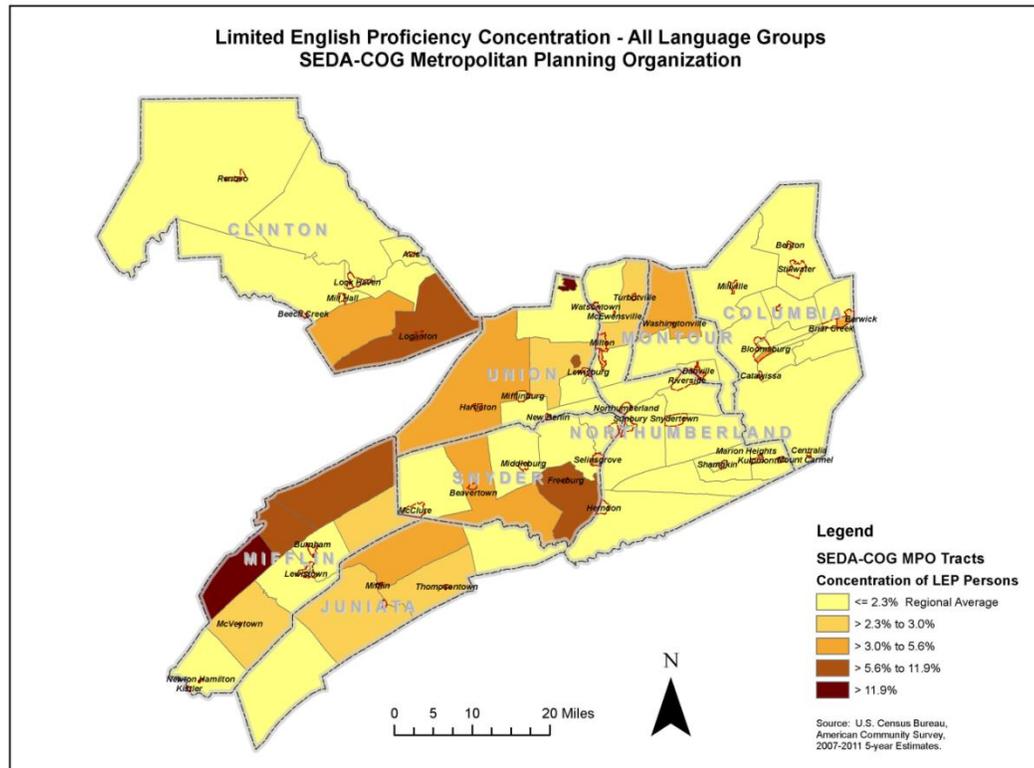
<sup>2</sup> Union County’s LEP population and concentration is skewed by the institutionalized populations at United States Penitentiary (USP) Lewisburg and USP Allenwood. When institutionalized populations are removed, the remaining non-institutionalized Union County LEP population is ~820 persons, making the concentration 2.2%.



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



**Figure 3. SEDA-COG MPO Concentration of Persons with Limited English Proficiency**





**Table 3. LEP Persons for All Language Groups by County**

County	Total Population	All Language Groups LEP	
		Speak English less than "very well" <sup>1</sup>	% of Total Population
Clinton County	36,852	637	1.7%
Columbia County	63,853	729	1.1%
Juniata County	22,918	634	2.8%
Mifflin County	43,706	1,935	4.4%
Montour County	17,215	503	2.9%
Northumberland County	89,104	985	1.1%
Snyder County	37,217	1,214	3.3%
Union County	42,708	1,599	3.7%
<b>Total</b>	<b>353,573</b>	<b>8,236</b>	<b>2.3%</b>

Yellow Highlight indicates highest three counties for LEP population and Percentage of Total Population.

**Source:** U.S. Census Bureau: American Community Survey (2007-2011), 5 Year Estimates.

***Largest LEP Language Groups in the SEDA-COG MPO Region***

**Table 4** summarizes population data for the five (5) most populous LEP language groups in the SEDA-COG MPO Region. Comparisons to the statewide Pennsylvania data are provided for the same language groups. The West Germanic (largely PA Dutch) 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 (in order by decreasing population): Russian (148); French (132); Arabic (102); Japanese (99); Gujarati (97); Mon-Khmer, Cambodian (97); and Polish (94). The LEP population for each other language group is 80 or fewer.

**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
<b>Total Population</b>	353,573		11,933,062	
<b>LEP Language Groups -- Speak English less than "very well"</b>				
Other West Germanic Languages <sup>1</sup>	3,535	1.00%	18,707	0.16%
Spanish	2,048	0.58%	196,334	1.60%
German	688	0.19%	10,803	0.09%
Italian	243	0.07%	13,834	1.2%
Chinese	224	0.06%	36,335	3.0%

**Notes:**

<sup>1</sup>Predominantly speakers of "Pennsylvania Dutch".

**Source:** U.S. Census Bureau: American Community Survey (2007-2011), 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 West Germanic and Spanish LEP populations.

### West Germanic Language Group

**Figures 4 and 5** illustrate the distribution of 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
- Northern Montour County
- Northern Northumberland County
- Southeastern Snyder County
- Western Union County

**Table 5** summarizes the West Germanic LEP populations by County. The SEDA-COG MPO region, when taken as a whole, is home to about 20% of Pennsylvania’s total West Germanic LEP population. Almost half of this LEP population resides in Mifflin County, which is home to twelve different Amish and Mennonite groups. The next largest populations exist in Snyder, Union, and Clinton Counties. Concentrations are highest in Mifflin County (3.7%) and Snyder County (1.6%), followed by Juniata County (1.1%). All other counties have concentrations less than the regional average of 1.0%.

**Table 5. West Germanic Language Group LEP Persons by County**

County	Total Population	West Germanic Languages LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Clinton County	36,852	321	0.87%
Columbia County	63,853	42	0.07%
Juniata County	22,918	261	1.14%
Mifflin County	43,706	1,615	3.70%
Montour County	17,215	110	0.64%
Northumberland County	89,104	198	0.22%
Snyder County	37,217	611	1.64%
Union County	42,708	377	0.88%
<b>Total</b>	<b>353,573</b>	<b>3,535</b>	<b>1.00%</b>

**Source:** U.S. Census Bureau: American Community Survey (2007-2011), 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 and northeastern Juniata County
- Eastern Snyder County
- Central Northumberland County

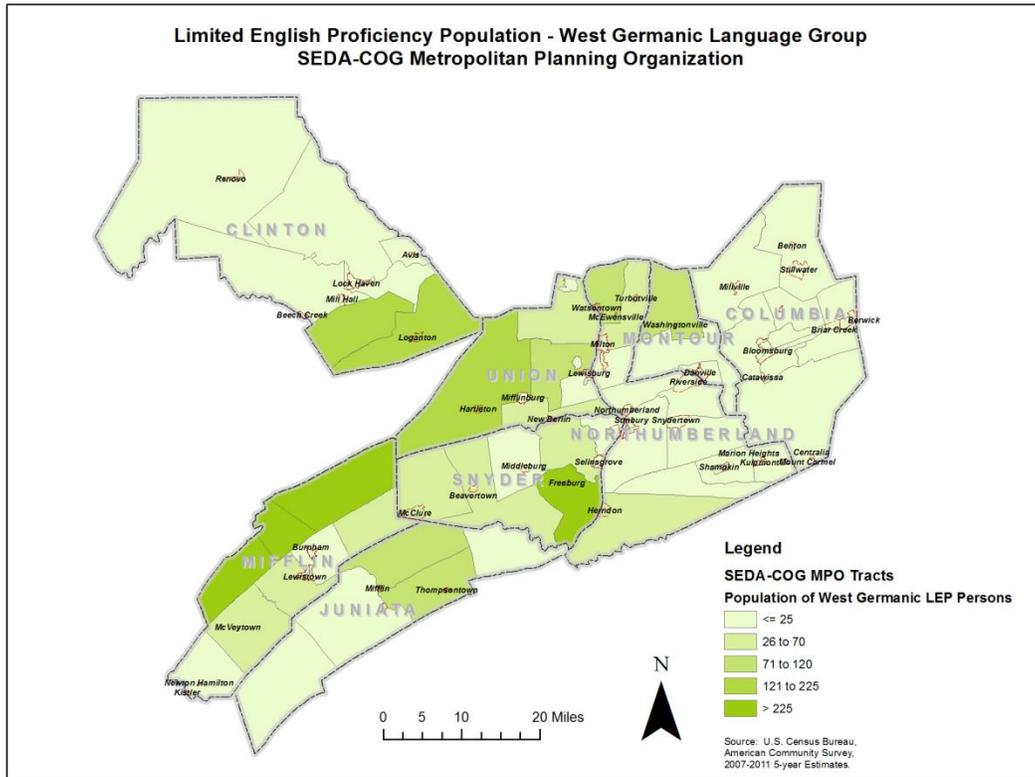
Table 6 summarizes the Spanish LEP populations by County. With the exception of the Juniata County locations, the higher populations are in the more urbanized areas of the MPO. The concentrations of Spanish LEP persons are far less pronounced, but occur in similar locations as the higher populations. Higher concentrations are noted in the towns of Milton, Selinsgrove, Lock Haven, and Lewistown. The highest concentrations occur in the penitentiary tracts in Union County.

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

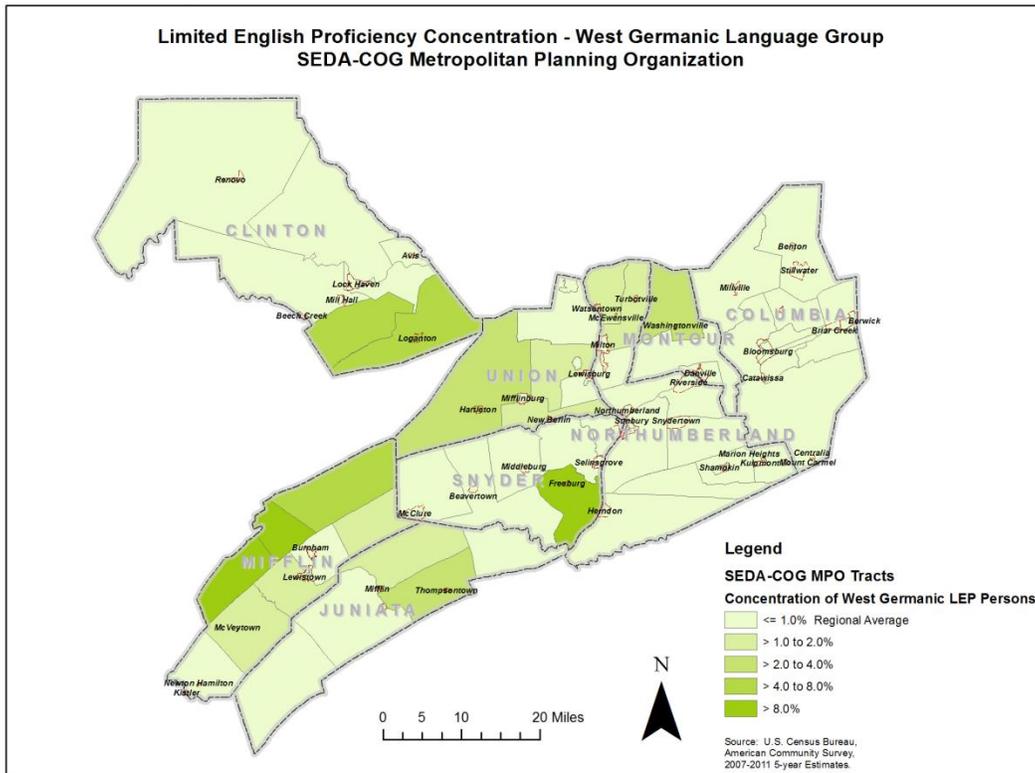
County	Total Population	Spanish Language LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Clinton County	36,852	85	0.23%
Columbia County	63,853	167	0.26%
Juniata County	22,918	214	0.93%
Mifflin County	43,706	66	0.15%
Montour County	17,215	150	0.87%
Northumberland County	89,104	445	0.50%
Snyder County	37,217	150	0.40%
Union County	42,708	771	1.81%
<b>Total</b>	<b>353,573</b>	<b>2,048</b>	<b>0.58%</b>

**Source:** U.S. Census Bureau: American Community Survey (2007-2011), 5 Year Estimates.

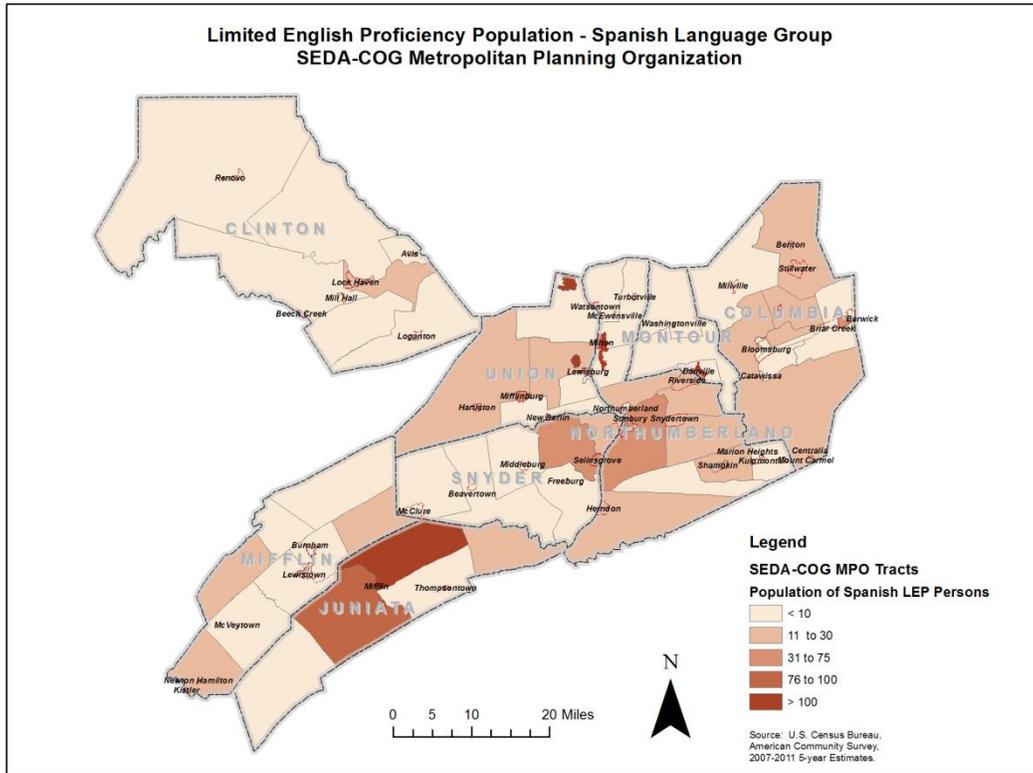
**Figure 4. West Germanic LEP Population by Census Tract**



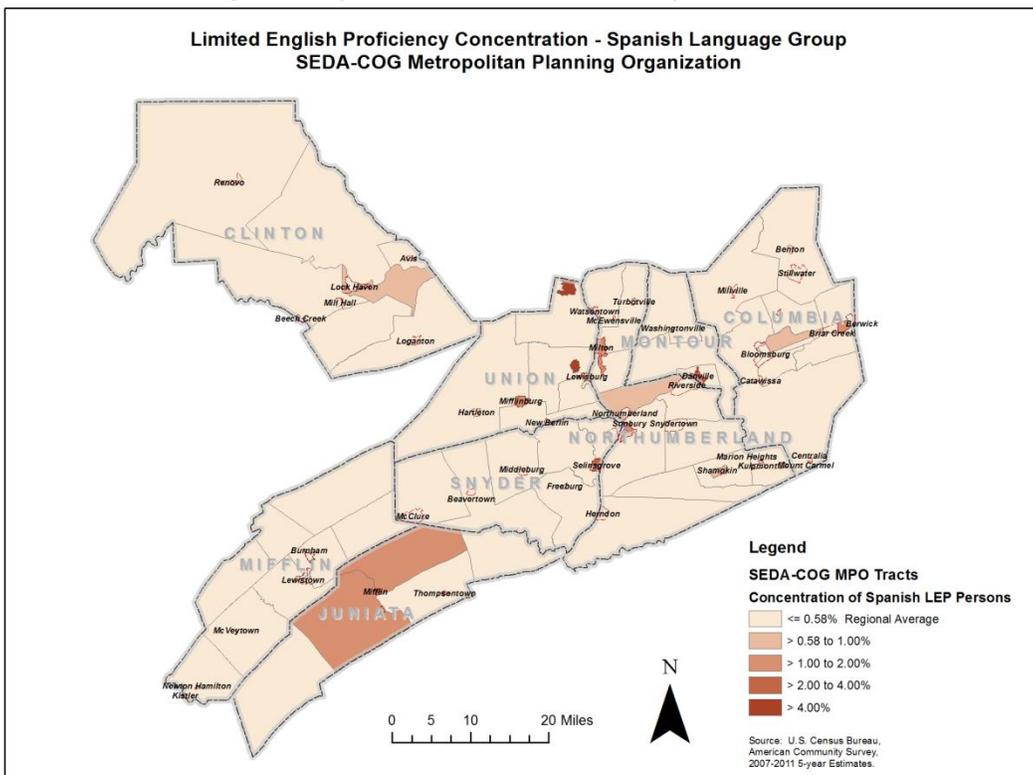
**Figure 5. West Germanic LEP Concentration by Census Tract**



**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.

### Safe Harbor Triggers

*The Safe Harbor Provision is triggered for each LEP language group that constitutes five percent (5%) of the total population 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 West Germanic and Spanish language groups exceed the 1,000 person threshold, even though the regional concentrations of both populations fall well 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 is every indication that the modified West Germanic LEP population would not trigger the Safe Harbor Provision. As a whole, 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<sup>3</sup> in the SEDA-COG MPO region for the Spanish language group alone.*** *The guidelines and requirements of the Safe Harbor Provision will not be applied to the West Germanic language group. However, this LEP Plan will maintain documentation of the West Germanic LEP populations as a baseline for future analyses.*

### 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, SEDA-COG MPO has designated the following as “vital documents” for translation:

- Notice of Language Services (**Appendix B**);
- Title VI Notice to Beneficiaries (**Appendix C**);
- Title VI Complaint Form (**Appendix D**); and

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<sup>3</sup> 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 Procedures (**Appendix E**).

While not considered “vital documents” translations of the Executive Summaries 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. 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 according to the Safe Harbor Provision and the Public Participation Plan.

## **Factor 2 – Frequency of Contact with LEP Persons**

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To date, the SEDA-COG MPO has received no direct requests for translation or interpretation services for any language, and the frequency with which LEP persons come in contact with the MPO’s planning program is largely unknown.

West Germanic (PA Dutch) is the most common language spoken by LEP individuals in the SEDA-COG MPO region. As a general rule, 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.

Still, the following contact with LEP individuals has been noted for other projects and plans completed in the MPO Region:

- Union County Comprehensive Plan – Union County developed and completed a plan-specific outreach effort to the Amish and Mennonite communities as part of their Comprehensive Plan, which was adopted in 2009. Direct contact was made with PA Dutch-speaking LEP persons in these communities, 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 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 speak to 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 appropriating tools and training its staff for recognizing LEP persons, identifying their language, and serving LEP persons, when the need arises. 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 & Importance of the Program**

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The SEDA-COG MPO is, primarily, a planning organization for transportation investments in the region. As such, the MPO does not provide direct assistance to individuals and, as such, is not a vital service that impacts the day-to-day life of residents in the region. However, 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 in the region.

In particular, 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 still not uncommon, and these crashes often result in fatalities. 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.

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 modes, as well as roadside and off-road pedestrian and bike facilities for day-to-day transportation. So while the planning activities of the MPO may not have urgent or 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 appropriating tools and training that will serve LEP persons that wish to participate.

### **Factor 4 – Resources & Costs of Language Assistance Services**

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The SEDA-COG MPO is a small agency with small capital resources available to spend on LEP services. The organization does have two (2) MPO staff 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 phone-based, on-demand interpretation service provided by the Commonwealth of PA, through PennDOT, is one such service.

The MPO pools resources with other elements of the larger SEDA-COG organization to develop and maintain the administrative/reception staff and other technical staff (GIS, IT, etc.) While none of the current staff is bilingual, many can recognize the Spanish language, and they 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 pooled resources of SEDA-COG also maintain the agency's webpage, office facility, and the associated office equipment and services.



## Language Assistance Plan

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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 to take steps that ensure meaningful access to the services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). 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 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 accommodations 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.).

### Structure of the LAP

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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

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#### *Notices and Advertisements*

The SEDA-COG MPO utilizes various methods and conduits for providing notice and advertisement of the language assistance services they provide, as follows:

- Posting translated notices in local newspapers as part of legal ads and press releases;
- 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 offices;
- › Distributing written and email notices to Interested Parties, in their requested language.

The MPO may 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
- › Presenting information at community 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 a number of languages, “If you need an interpreter, please point to your language.” The LEP person points to their language on the card to indicate their language. Each language is also identified in English at the right side of the page, 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 F**. 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 G**.

### ***Telephone-Based Interpretation Service***

The Commonwealth of PA maintains a contract with a telephone-based (a.k.a, “on-demand”) interpretation service and provides public agencies with access to the service, free of charge. 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. According to the MPO’s minimal amount of interaction with LEP persons, this service should provide an adequate level of interpretation service for the MPO’s needs.

Instructions for accessing the telephone-based service (phone number and access code) along with “helpful hints” for working with an over-the-phone interpreter are provided in **Appendix H**. The service is provided free-of-charge by the Commonwealth of PA through PennDOT.



The MPO staff person who is interacting with an LEP person calls the phone number and the operator will either assist in identifying the LEP person's language, or if the language is known, the language code may be entered directly. 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. Translated summaries of SEDA-COG's primary but non-vital planning documents will be provided in Spanish upon request. This encompasses the Long Range Transportation Plan, Public Participation Plan, Coordinated Human Services Transportation Plan, and Transportation Improvement Program. The translations of non-vital documents may be provided via human or automated translation. The telephone-based, on-demand 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, multi-lingual 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 given in **Appendix I**.

➤ **Automated Translation (Google Translate, Bing Translator)**

Online automated translation services, such as Google Translate (<https://translate.google.com/>) or Bing Translate (<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. As an implementation step of this plan, SEDA-COG intends to implement Google Translate on the entire SEDA-COG website, including the MPO's pages. Similar to other agency sites, icons or hyperlinks that identify alternative languages and initialize Google Translate could be added to the webpage. The function would automatically translate website text into the user's language of choice. In keeping with best practices for making web-based translation services accessible, SEDA-COG intends to implement code that shows icons for the largest ten (10) LEP language groups in the SEDA-COG MPO's service area.

To verify the accuracy of Google Translate, the SEDA-COG MPO's webpage was translated into Spanish, and the output was evaluated by a bi-lingual English/Spanish translator. The detailed results of this evaluation are summarized in **Appendix K**. 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.



## The “Four I” Approach

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The “Four I” Approach is a template for structuring the implementation process at each Contact Point, and is defined according to the following four (4) 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

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### **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.

<b>Public Meetings</b>	
<b>Inform</b>	Legal Ad Press Releases Webpage Ad Notice of Language Services (venue)
<b>Identify</b>	Contact SEDA-COG prior to meeting Language Card
<b>Interact</b>	Telephone-Based Interpretation Service Designated Staff person
<b>Instruct</b>	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 email 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 notice will



be provided in both English and Spanish languages. The following sample text would be used and adapted, as necessary:

**ENGLISH:**

“The content of this [advertisement / press release / posting] is available in alternative formats and other languages upon request by contacting the SEDA-COG Metropolitan Planning Organization (MPO). Persons who plan to attend the announced [meeting / event / activity] and require language interpretation services and/or special accommodations under the American with Disabilities Act should contact the SEDA-COG MPO at least five (5) days prior to the [meeting / event / activity]. Contact the MPO by phone at (570) 524-4491, by written letter addressed to 201 Furnace Road, Lewisburg, PA 17837, or by email to [jsaylor@seda-cog.org](mailto:jsaylor@seda-cog.org).

**SPANISH:**

"El contenido de este [anuncio/ comunicado de prensa / publicación] está disponible en formatos alternativos y otros idiomas bajo pedido en la Organización de Planificación Metropolitana de SEDA-COG (MPO). Las Personas que planean atender la [reunión / evento/ actividad] anunciada y requieren de servicios de interpretación y/o arreglos especiales bajo la Ley sobre Estadounidenses con Discapacidades deben comunicarse con SEDA-COG MPO por lo menos cinco (5) días anteriores a la [reunión / evento/ actividad]. Contacte la MPO por teléfono al (570) 524-4491, mediante carta escrita al 201 Furnace Road, Lewisburg, PA 17837, o por correo electrónico a [jsaylor@seda-cog.org](mailto:jsaylor@seda-cog.org).

At the meeting venue, the SEDA-COG MPO will display a poster-sized version of its *Notice of Language Services (Appendix B)*. The notice will be displayed in both English and Spanish.

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” themselves, as requested in the *Notice of Language Services*. The MPO will maintain a Language Identification Card 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 *Notice of Language Services* and 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 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 at their office in person. While this method of contact may be infrequent, the purpose of such a visit may be more urgent and have a more weighty 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.

<b>Office Walk-In</b>	
<b>Inform</b>	Notice of Language Services (lobby) Language Reception Instructions (lobby)
<b>Identify</b>	Language Card
<b>Interact</b>	Telephone-Based Interpretation Service
<b>Instruct</b>	Reception Process

#### Inform

Initial contact between the LEP person and SEDA-COG staff will likely occur in the SEDA-COG office lobby. Therefore, in this location, a poster-sized version of the *Notice of Language Services* (**Appendix B**) will be displayed. The notice will be displayed in both English and Spanish. Along with the *Notice*, a second smaller poster will briefly describe (again, in English and Spanish) the process that the SEDA-COG reception staff will use to identify the language spoken and call the telephone-based interpretation service.

#### Identify

It is preferable that LEP persons “self-identify” themselves, as requested in the *Notice of Language Services*. The MPO will maintain a Language Identification Card at the Reception Desk, for use in discovering 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:

- Lobby Posters and other Bi-Lingual Informational Material – Training will identify the location, content, and use of the lobby posters and any other supplemental material developed for use in



the SEDA-COG lobby to notify the LEP person of the availability of language services and the process that he or she can expect.

- 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 meeting.

<b>Telephone Call</b>	
<b>Inform</b>	Explanation of Services Available (through phone service)
<b>Identify</b>	Through Phone Service
<b>Interact</b>	Telephone-Based Interpretation Service
<b>Instruct</b>	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, web posting, or other announcement that solicits the call for a purpose 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 once 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 all 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, which may require the use of advanced phone system features in transferring the call.

#### 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 is [www.seda-cog.org/transportation](http://www.seda-cog.org/transportation). The site provides a platform for disseminating information about its plans and programs, advertising upcoming activities, and receiving input through a Comment Page. Contact with the SEDA-COG MPO through their 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 confrontational than telephone or in-person contact.

Webpage	
<b>Inform</b>	Webpage notice
<b>Identify</b>	Self-Identify
<b>Interact</b>	Google Translate
<b>Instruct</b>	Web Standards/Protocol

As an implementation step of this plan, SEDA-COG intends to implement Google Translate on the entire website. In addition certain human-translated “vital documents” (identified previously) are available on the website in Spanish. To verify the accuracy of the Google Translate tool for the Spanish language, an analysis of the Spanish Google Translate output for the SEDA-COG MPO webpage was completed by a bi-lingual English/Spanish translator to verify the accuracy of the translation (see **Appendix K**). 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.

### Inform

The *Notice of Language Services* (**Appendix B**) will be integrated into the SEDA-COG MPO webpage through one or more of the following:

- Adding the *Notice of Language Services* to the SEDA-COG MPO webpage, with one or more links added in the navigation menu (webpage, left side). Links would be placed under the “Public Participation Plan” and “Comments” sections. The *Notice* would display in Spanish and English.
- Adding a hyperlink to the *Notice of Language Services* adjacent to the Google Translate icon, when this tool is added to the webpage.
- Integrating the *Notice of Language Services* into the Google Translate tool, such that a new “popup” tab opens the first time a user activates Google Translate. The notice will display in Spanish and English.



Identify

Since use of the SEDA-COG MPO webpage would be self-directed, identification of the LEP person would be accomplished through the user’s selection of language through the Google Translate tool.

Interact

With an LEP Person accessing 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 web page design and ease of use may require some thought about how LEP persons would approach and use the webpage. Training of the IT staff may be necessary for successful webpage integration of the Google Translate tool (web standards, protocols, HTML coding).

**Written Correspondence**

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

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

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 email address. On the SEDA-COG website, the office address appears at the top and bottom of every page, with SEDA-COG’s general email address ([Admin@seda-cog.org](mailto:Admin@seda-cog.org)) at the bottom. 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, web posting, or other announcement that solicits the call for a purpose 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 paper 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 email 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.

### 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. Since 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**

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As part of the LAP, the SEDA-COG MPO has identified resources and tools to 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*. Jim Saylor, 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 1 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 Appendix of this LEP Plan Document. Versions of these materials are maintained in electronic (PDF) and paper copy (binder). 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; or
- Alongside a copy of the Training Presentation for “self-paced” training.

Paper copies of the *Manual* will be maintained in the SEDA-COG receptionist’s desk and at the Welcome Center of SEDA-COG MPO public meetings, so that the language assistance materials are available for quick reference in serving LEP persons.

## **Plan Evaluation Process**

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The LAP, along with the larger LEP Plan, will be evaluated annually by interested staff or a committee assembled by the Language Assistance Coordinator, in compliance with current FHWA and FTA guidance. An update to the LAP, which is provided in the appendix of the SEDA-COG MPO Public Participation Plan, will be considered a “technical update” and would not require public comment and re-adoption by the MPO unless the update substantially changes the public participation process.

The following materials are provided in **Appendix L** for use in the annual 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

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"About Big Valley." Big Valley Area Business Association. Nov. 13 2007.

<http://www.visitbigvalley.com/history/index.htm>

*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](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.

[http://www.fta.dot.gov/documents/FTA\\_Title\\_VI\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf)

*LEP Handbook*, Federal Transit Administration.

[http://www.fta.dot.gov/documents/LEP\\_Handbook.doc](http://www.fta.dot.gov/documents/LEP_Handbook.doc)

*Overview of Title VI of the Civil Rights Act of 1964*, Department of Justice.

<http://www.justice.gov/crt/about/cor/coord/titlevi.php>



## Appendix

<b>Appendix A</b>	Language Assistance Interview with SEDA-COG MPO Staff
<b>Appendix B</b>	Notification of Language Services (English and Spanish Versions)
<b>Appendix C</b>	Title VI Notice to Beneficiaries (English and Spanish Versions)
<b>Appendix D</b>	Title VI Complaint Form (English and Spanish Versions)
<b>Appendix E</b>	Title VI Complaint Form Procedure (English and Spanish Versions)
<b>Appendix F</b>	Language Identification Card Language Identification Survey
<b>Appendix G</b>	“One Moment Please” Tool
<b>Appendix H</b>	Telephone-Based Interpretation Service
<b>Appendix I</b>	Translation & Interpretation Service Providers
<b>Appendix J</b>	Community & Agency Contacts
<b>Appendix K</b>	Verification of Google Translate Performance
<b>Appendix L</b>	Employee Resources Manual
<b>Appendix M</b>	Limited English Proficiency Plan Self-Assessment Checklist LEP Interaction Tracking Form: Record of Interactions LEP Interaction Tracking Form: Annual Report



**Appendix A**

**Language Assistance Interview with SEDA-COG MPO Staff**



## Language Assistance Interview with SEDA-COG MPO Staff

SEDA-COG Interview Questions | 10.17.14

PARTICIPANTS: Steve Herman, SEDA-COG MPO  
Jim Saylor, SEDA-COG MPO  
Rebecca Rosa-Clarke [RRC], McCormick Taylor (Interviewer)

### INTERVIEW SUMMARY:

*[RRC] How are you currently providing language assistance?*

[SEDA-COG MPO] In five or six years, there have been no requests for translation. But the SEDA-COG MPO has consistently posted that the services are available and has included discussion about web translation services in their plans. In the past, one option that was considered was to utilize local university translation services, such as Susquehanna and Bucknell Universities. Notification has generally been made via public meeting advertisements; standard FHWA text regarding special accommodations has been included in the ads.

*[RRC] What has been the biggest difficulty for the SEDA-COG MPO in the past with regard to providing language assistance services?*

[SEDA-COG MPO] Because there have been no requests, the first request will be the biggest challenge. It will be difficult to determine how translation of documents will go. Will all of the text be translated or just a summary? There is concern that the Safe Harbor Threshold will be crossed for either Spanish or West Germanic. PennDOT District 2 has had some success in the past in dealing with Amish populations. Some of the younger people have gone to public meetings and have gone back and talked the elders through the process. One big issue with Amish is safety. It is important to make sure they have sufficient roadway shoulders, because they often ride in high speed or high crash areas in buggies. When they are hit by other vehicles, there is likely to be a fatality, and it is also likely to be a hit and run. There are service concerns specifically on Route 655, where they often utilize the corridor, and in Belleville, PA, and Sugar Valley area in Clinton County. The Old Order Amish population is growing, and there is increasing tension with other residents because Amish farmers are acquiring farmland. The main planning issues with the Amish are land use, safety, and safety planning. At the county level, they are prosecuting because the buggies aren't following the standards for minimum reflectivity and lighting.

*[RRC] What kind of staff resources do you have? Are there any staffing limitations?*

[SEDA-COG MPO] The SEDA-COG MPO has a small staff, with limited access to other people outside of the organization. They share GIS services, and there are many part-time workers. When there is a public meeting, everyone will be busy prepping for the meeting and will be unable to pay special attention to LEP concerns. Therefore, it will be necessary to have everything prepared beforehand.



[RRC] *What tools would be the most useful for you?*

[SEDA-COG MPO] Ads are often used. It would be good to have several methods available.

[RRC] *How do you provide notification to LEP people currently? Are there specific locations or methods utilized to notify? For example, bulletin boards where notices are posted.*

[SEDA-COG MPO] In Juniata County, outreach to LEP groups was done for a Bridge Replacement Project. However, the SEDA-COG MPO generally does regional-based projects and would need to provide outreach on a regional level instead of project-specific. It is unlikely that there is one central place where you can get everybody.

[RRC] *How would you handle a phone call from an LEP person? We can propose a system for handling such calls, but it would likely require some training of staff in fielding the calls and connecting with a telephone interpreter service. Is it feasible to implement such a system and find such a staff person? Who's the best staff person to handle this?*

[SEDA-COG MPO] There are a few people who share phone duties, so it may not be possible to have one coordinator. *[Would it be helpful to have a binder that clearly laid out the protocol, so that anyone who is in charge of the phone could retrieve the binder at some central location and find instructions for how to handle a given situation? All of those who occasionally pick up the phone could also be sent a PDF of the binder information, so that they could do a self-directed training of the information.]* Yes, that would be a good solution. Then the main phone line would be the number that LEP individuals would call and whoever picked up the phone would know how to handle that. New staff could also receive the PDF.

[RRC] *As part of the LEP Plan, we need to identify the type of services that are provided by SEDA-COG and which ones will have the most serious consequences for LEP individuals (if they cannot participate in these services because of a language barrier)?*

[SEDA-COG MPO] Safety considerations are the most important. For a PennDOT District 2 project in Mifflintown, it was determined that replacement for a local bridge would have a disproportionate impact on Spanish-speaking pedestrians. This was an example of a project-level LEP impact. Outreach was done in Clinton County on an interchange on US 220 north of I-80. There was an issue of grade separation in an intersection on a two-lane highway. There were high speeds on the main line. Amish traffic regularly crossed the intersection, so they were included in outreach. Multimodal considerations are an important aspect for LEP populations as well as safety.

[RRC] *Of the Long Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), Public Participation Plan (PPP), Unified Planning Work Program (UPWP), and Coordinated Transit-Human Services-Transportation Plan, which are the most critical documents? Are there others of which we should be aware?*



[SEDA-COG MPO] The PPP is obviously important. But for all the translated plans, how would translation work? Would footnotes be provided in other languages? With West Germanic it's difficult. For the LRTP and PPP, an executive summary could be translated instead of the whole documents. But the TIP has associated documents so it would be more difficult. Also not all the maps were included in the TIP; they are just available upon request. SEDA-COG is skeptical of the idea of having one liaison act as the voice of any LEP community. Amish communities, in particular, vary so much from group to group that it doesn't make sense to have one representative. *[Perhaps when there is a translation request for a document like the TIP, it would be helpful to have an interpreter available to voice the specific concerns of the LEP individual instead of trying to translate the whole document or have them act as the voice of their community?]* Yes, that would work. That way, we are fulfilling the requirement of offering translation of documents if needed.

[RRC] *In the FTA Circular, it is stipulated that for populations with literacy issues, written translation isn't necessary as long as verbal translation is done. In the case of West Germanic, it may be more useful to provide interpretation services for planning documents instead of trying to do a written translation.*

[SEDA-COG MPO] Agreed.

[RRC] *Often, LEP requirements change annually, so there is a need to review current requirements on an annual basis. Who will review the LAP to ensure that it is up to date? How will it be documented?*

[SEDA-COG MPO] As part of the protocol that will be included in the binder, we'd provide them with the website where they would need to check for FTA updates. We'll need to work on identifying the person who would do yearly monitoring.



**Appendix B**

**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, he or she 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, he or she 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 email correspondence to [jsaylor@seda-cog.org](mailto:jsaylor@seda-cog.org). The MPO also provides a Comments Portal on their website at <http://www.seda-cog.org/transportation/Pages/Comments.aspx>. 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), complaint forms, and notification of rights. These translated documents are available in paper copy through the SEDA-COG MPO office, and many are also available online at the MPO's website (<http://www.seda-cog.org/transportation/Pages/Home.aspx>).



## 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 [jsaylor@seda-cog.org](mailto:jsaylor@seda-cog.org). La MPO también tiene a su disposición el Portal de Comentarios en su página web <http://www.seda-cog.org/transportation/Pages/Comments.aspx>. Traduiremos 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 (<http://www.seda-cog.org/transportation/Pages/Home.aspx>).



**Appendix C**

**Title VI Notice to Beneficiaries  
(English and Spanish Versions)**



## Title VI Notice to Beneficiaries (English)

### **SEDA-COG METROPOLITAN PLANNING ORGANIZATION (MPO) NOTIFICATION OF PROTECTIONS TO THE PUBLIC OF RIGHTS UNDER TITLE VI AND INSTRUCTIONS ON HOW TO FILE A COMPLAINT**

It is SEDA-COG MPO's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, disability, sex, age, low income, national origin or limited English proficiency, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs or services, as provided by Title VI of the Civil Rights Act of 1964, as amended.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint. All complaints received are documented and assigned to the appropriate staff for investigation.

For more information on the SEDA-COG MPO's civil rights program and the procedures to file a complaint, or to get information in another language, please contact:

Mr. James Saylor, P.E., PTOE  
Title VI Compliance Officer  
SEDA-COG MPO  
201 Furnace Road  
Lewisburg, PA 17837

(570) 524-4491  
[jsaylor@seda-cog.org](mailto:jsaylor@seda-cog.org)  
[www.seda-cog.org](http://www.seda-cog.org)

After the complaint is processed, a response (if requested) will be sent to the customer filing the complaint and appropriate corrective action is taken.

A Complainant may file a complaint directly with the Federal Highway Administration by filing a complaint with the Equal Opportunity Specialist, U.S. Department of Transportation, Federal Highway Administration, 228 Walnut Street, Room 508, Harrisburg, PA 17104-2515.



**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 apropiados 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:

Mr. James Saylor  
Title VI Compliance Officer  
SEDA-COG MPO  
201 Furnace Road  
Lewisburg, PA 17837

(570) 524-4491  
[jsaylor@seda-cog.org](mailto:jsaylor@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 presentar 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 D**

**Title VI Complaint Form  
(English and Spanish Versions)**



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

SEDA-COG MPO recognizes its responsibilities to the communities it serves. It is SEDA-COG MPO's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, disability, gender, age, low income, national origin, language or limited English proficiency (LEP), be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs or services, as provided by Title VI of the Civil Rights Act of 1964, as amended. These procedures apply to all external complaints relating to any program or activity administered by SEDA-COG MPO and/or its sub-recipients, consultants and contractors, filed under Title VI of the Civil Rights Act of 1964 as amended, (including Disadvantaged Business Enterprise and Equal Employment Opportunity components), as well as other related laws that prohibit discrimination.

The following information is necessary for processing your complaint. If you require assistance in completing this form, please contact the SEDA-COG MPO Compliance Officer by calling (570) 524-4491. Please return the completed form to the SEDA-COG MPO Compliance Officer at SEDA-COG MPO, 201 Furnace Road, Lewisburg, PA 17837. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Complainant Name:

\_\_\_\_\_

Name of Individual Assisting Complainant:

\_\_\_\_\_

Complainant Address:

\_\_\_\_\_

Assisting Individual Address:

\_\_\_\_\_

\_\_\_\_\_

Complainant Phone:

\_\_\_\_\_

Assisting Individual Phone:

\_\_\_\_\_

Complainant Alt. Phone:

\_\_\_\_\_

Assisting Individual Alt. Phone:

\_\_\_\_\_

Which of the following describes the reason(s) the alleged discrimination took place?

Race   Age   Color   Gender   Language/LEP   National Origin   Disability   Retaliation

Date(s) of Incident: \_\_\_\_\_



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

Please provide a detailed description of the circumstances of the incident(s), including any additional information supporting your complaint (please use additional pages as necessary).

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Please provide the name(s), and title and address (if known) of the person who discriminated against the Complainant.

---

Please provide, if applicable, names and contact information of people who may have knowledge of the alleged incident(s) or are perceived as parties in the complained-of incident(s):

---

Please list any other agency where complaint has been filed:

---

I affirm that I have read the above complaint and that it is true to the best of my knowledge, information and belief.

Complainant's Signature \_\_\_\_\_ Print Name of Complainant \_\_\_\_\_ Date \_\_\_\_\_

Assisting Individual Complainant's Signature \_\_\_\_\_ Print Assisting Individual Name \_\_\_\_\_ Date \_\_\_\_\_

Date Received: \_\_\_\_\_ Received By: \_\_\_\_\_



**Title VI Complaint Form**  
(Spanish)

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

SEDA-COG está comprometido con asegurar que ninguna persona sea excluida de participar o se le nieguen los beneficios de sus servicios de transporte en base a raza, color o nacionalidad, tal como lo protege el Título VI de la Ley de Derechos Civiles de 1964. Quejas de Título VI tiene que ser entregadas dentro de 180 días dispues de la fecha de la supuesta discriminación.

Se necesita la siguiente información para el procesamiento de su su queja. Si require asistencia para llenar esta solicitud, por favor póngase en contacto con James Saylor al (570) 524-4491. Por favor entregue la solicitud a: Title VI Compliance Officer, SEDA-COG MPO, 201 Furnace Road Lewisburg, PA 17837. Quejas Título VI deben ser presentadas dentro de los 180 días calendario a partir de la fecha de la supuesta discriminación.

Nombre del Querellante:

\_\_\_\_\_

Nombre de la Persona Ayudando el Querellante:

\_\_\_\_\_

Dirección del Querellante:

\_\_\_\_\_

Dirección del Ayudante:

\_\_\_\_\_

\_\_\_\_\_

Número de Teléfono del Querellante:

\_\_\_\_\_

Número de Teléfono del Ayudante:

\_\_\_\_\_

Número de Teléfono Alternativo del Querellante:

\_\_\_\_\_

Número de Teléfono Alternativo del Ayudante:

\_\_\_\_\_

Cuál de los siguientes opciones describe la causa de la supuesta discriminación? (Márque con un círculo)

Raza    Edad    Color    Sexo    Idioma    Nacionalidad    Discapacidad    Represalias

Fecha(s) de Incidente: \_\_\_\_\_



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

Por favor describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de los empleados de SEDA-COG involucrados si se conocen. Explique lo que pasó y quién fue responsable (por favor utilice hojas adicionales como sea necesario).

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Por favor, indique el nombre (s), y el título y dirección (si se conoce) de la persona que discrimina en contra de la demandante.

---

Sírvase proporcionar, en su caso, los nombres y datos de contacto de las personas que puedan tener conocimiento del supuesto incidente (s) o son percibidos como partes en el quejado de incidente (s):

---

Por favor escriba cualquier otra agencia donde denuncia ha sido presentada:

---

Afirmo que he leído los cargos anteriores y que es fiel a lo mejor de mi conocimiento, la información y la creencia:

---

Firma del Demandante	Nombre del Demandante (en letras legibles)	Fecha
----------------------	--------------------------------------------	-------

---

Firma del Ayudante	Nombre del Ayudante (en letras legibles)	Fecha
--------------------	------------------------------------------	-------

Fecha de Recepción: \_\_\_\_\_ Recibido por: \_\_\_\_\_



**Appendix E**

**Title VI Complaint Form Procedure  
(English and Spanish Versions)**



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

The SEDA-COG MPO will acknowledge receipt of the complaint by notifying the Complainant within 15 calendar days of the “Date Received” shown above. If the Complainant is unsatisfied with the response from the SEDA-COG MPO Compliance Officer and/or Executive Director, the SEDA-COG MPO will transmit the complaint to the proper state or federal agency—Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the Pennsylvania Department of Transportation (PennDOT) for investigation and disposition pursuant to that agency’s Title VI complaint procedures.

1. Complete and return form to SEDA-COG MPO Compliance Officer at SEDA-COG MPO, 201 Furnace Road Lewisburg, PA 17837 within 180 calendar days from the alleged incident.
2. The complaint will be reviewed and investigated by the SEDA-COG MPO Compliance Officer.
3. SEDA-COG MPO Compliance Officer, along with appropriate members of SEDA-COG MPO staff, will determine the merit of the claim and within 15 calendar days provide the Complainant, and/or the Individual Assisting Complainant, a written acknowledgement that SEDA-COG MPO has either accepted or rejected the complaint.
4. If the Complainant is unsatisfied with the response, the complaint may be presented to the Executive Director within 10 calendar days from receiving the response.
5. The Executive Director will respond to the Complainant, and/or the Individual Assisting Complainant, within 15 calendar days.
6. If the Complainant is unsatisfied with the response, the investigative report and findings will be reviewed by the SEDA-COG MPO Board and SEDA-COG MPO counsel.
7. A copy of the complaint and SEDA-COG MPO’s investigative report/findings and remedial action plan, if appropriate, will be issued to the proper state or federal agency (e.g.: FHWA, FTA, and PennDOT) within 120 calendar days of receipt of the complaint.
8. A summary of the complaint and its resolution will be included as part of the Title VI updates to the proper state or federal agency (e.g.: FHWA, FTA, and PennDOT).
9. Records will be available for compliance review audits.



## **Title VI Complaint Form Procedure** (Spanish)

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

El MPO SEDA-COG acusará recibo de la denuncia mediante notificación al demandante dentro de los 15 días de la presentación de quejas. El MPO SEDA-COG transmitirá la denuncia al estado adecuado o agencia federal (por ejemplo: Administración Federal de Carreteras, la Administración Federal de Tránsito, y PennDOT) para investigación y disposición de conformidad con los procedimientos de queja del Título VI de ese organismo.

1. Llene y envíe su solicitud a: Title VI Compliance Officer, SEDA-COG MPO, 201 Furnace Road Lewisburg, PA 17837, dentro de 180 días calendarios después del supuesto incidente.
2. La queja será revisada y examinada por el administrador de SEDA-COG.
3. El Administrador, junto con los miembros del equipo de dirección determinarán el mérito de la queja y dentro de 10 días mandar un acuse de recibo al demandante de aceptación o oposición.
4. Si el demandante está insatisfecho con la respuesta, la queja puede ser presentada al Director Ejecutivo dentro de 5 días hábiles después de recibir su respuesta.
5. El Director Ejecutivo responderá dentro de 10 días hábiles.
6. Si el demandante está insatisfecho con la respuesta, el informe de investigación y fallos será revisado por la Junta Directiva SEDA-COG.
7. Si relevante, una copia de la queja y el informe de investigación/fallos y plan de acción correctivo serán enviados a FTA dentro de 120 días de recibo de la queja.
8. Un resumen de la queja y su resolución será incluido como parte de las actualizaciones de Título VI a FTA.
9. Anotaciones estarán disponibles para auditorías de reviso de cumplimiento.



**Appendix F**

**Language Identification Card  
Language Identification Survey**



# Language Identification Card



**Amharic:** አማርኛ  
ለስተርጓሚ የሚፈልጉ ከሆነ ለባዘጋጅ ጽንጽዎ ላይ ይጠቁሙ

**Armenian:** Հայերեն  
Եթե դուք քարոզմանը կարող ունեք, խնդրում ենք ստանալուցիկ ձեր լեզուն

**Burmese:** မြန်မာစကား  
အကယ်၍ သင် စကားပြန်တစ်ဦးလိုအပ်ပါက ကျေးဇူးပြု၍ သင်၏ဘာသာစကားကို ညွှန်ပြပါ

**Croatian:** Hrvatski  
Ako vam je potreban prevoditelj, pokažite na svoj jezik

**Farsi:** فارسی  
اگر به مترجم شغاهی نیاز دارید، به زبانی که تکلم می کنید اشاره نمایید

**French:** Français  
Si vous avez besoin d'un interprète, indiquez votre langue

**Greek:** Ελληνικά  
Αν χρειάζεστε διερμηνέα, παρακαλώ δείξτε τη γλώσσα σας

**Haitian Creole:** Kreyòl ayisyen  
Si w bezwen yon entèprèt, montre ki lang ou pale

**Hindi:** हिन्दी  
यदि आपको भाषा अनुवादक की आवश्यकता है, तो अपनी भाषा की ओर इशारा करें

**Hungarian:** magyar  
Ha tolmácsra van szüksége, nézze meg a saját nyelvét

**Japanese:** 日本語  
通訳が必要な場合は、あなたの言語を指し示してください

**Korean:** 한국어  
통역자가 필요하시면 사용하시는 언어를 말씀해 주세요

**Nepali:** नेपाली  
यदि तपाईंलाई दोस्रो आवश्यक भएमा, कृपया आफ्नो भाषा देखाउनुहोस्

**Polish:** Polski  
Jeśli potrzebujesz tłumacza, wskaż swój język

**Punjabi:** ਪੰਜਾਬੀ  
ਜੇ ਤੁਹਾਨੂੰ ਫੌਜ ਟੁਕਾਈ ਦੀ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਸੰਕੇਤ ਕਰੋ

**Russian:** Русский  
Если вам нужен переводчик, выберите ваш язык

**Somali:** Soomaali  
Hadaad u baahan tahay turjumaan, tilmaamo luqadaada

**Swahili:** Kiswahili  
Ikiwa unahitaji mkalimani, tafadhali rejelea lugha yako

**Taglog:** Taglog  
Kung kailangan ninyo ng interpreter o tagasalin, ituro ang inyong wika

**Thai:** ภาษาไทย  
หากคุณต้องการล่าม กรุณาชี้ไปที่ภาษาของคุณ

**Urdu:** اُردو  
اگر آپ کو ایک مترجم درکار ہے، براہ کرم اپنی زبان بتائیں

**Arabic:** عربي  
إذا كنت في حاجة إلى مترجم أشر إلى اللغة المطلوبة

**Bosnian:** Bosanski  
Ako vam je potreban prevodilac, pokažite na svoj jezik

**Cambodian:** ភាសាខ្មែរ  
បើអ្នកមានតម្រូវការអ្នកបកប្រែ សូមបង្ហាញពីភាសាដែលអ្នកប្រើ

**Dutch:** Nederlands  
Als u een tolk nodig hebt, wijs dan uw taal aan

**Finnish:** Suomi  
Jos tarvitset tulkin, osoita kielivalintaasi

**German:** Deutsch  
Wenn Sie einen Dolmetscher benötigen, bitte Ihre Sprache anzeigen

**Gujarati:** ગુજરાતી  
જો તમારે ભાષાતરજમની જરૂર હોય તો તમારી ભાષા તરફ ચીવો

**Albanian:** Shqip  
NËSE keni nevojë për përkthyes, ju lutem referojuni gjuhës tuaj

**Hmong:** Hmoob  
Yog koj xav tau ib tug kws txhais lus, thov tau tes rau koj hom lus

**Italian:** Italiano  
Se avete bisogno di un interprete, indicate la vostra lingua

**Kirundi:** Kirundi  
NIWOBA WIFUZA UWOGUSIGURIRA URURIMI FYONDA AHANDITSE URURIMI RWAVE

**Laotian:** ພາສາລາວ  
ຖ້າທ່ານຕ້ອງການບາງຄົນເປັນຜູ້ແປ, ກະລຸນາຊີ້ໃຫ້ຮຽນຮອງທ່ານ

**Norwegian:** Norsk  
Hvis du trenger en tolk, kan du peke på landet ditt

**Portuguese:** Português  
Se precisa de um intérprete, aponte para seu idioma

**Romanian:** Română  
Daca aveți nevoie de un interpret, vă rugăm indicați limba dvs

**Serbian:** Српски  
Ako vam je potreban prevodilac, pokažite na svoj jezik

**Spanish:** Español  
Si necesita un intérprete, por favor seleccione su idioma respectivo

**Swedish:** Svenska  
Om ni behöver en tolk, var god ange ert språk

**Tamil:** தமிழ்  
மொழிபெயர்ப்பு தேவையென்றால் தங்களின் மொழியைக் குறிப்பிடவும்

**Tigrinya:** ትግርኛ  
ለስተርጓሚ ትደልፉ ለተገንዝዎ ገዢዎችንም ላብ ጽንጹጥ ያልኩት ግብር

**Vietnamese:** Tiếng Việt  
Nếu cần thông dịch viên, xin hãy chỉ vào ngôn ngữ của quý vị

	Simplified Chinese	Traditional Chinese
Cantonese	粵語	粵語
Chaochow	潮州話	潮州話
Fukienese	福建話	福建話
Fuzhou	福州話	福州話
Mandarin	普通話	國語
Shanghai	上海話	上海話
Taiwanese	台灣話	台語
Tolshanesse	台山話	台山話
Ning Po	寧波話	寧波話
	如果您需要译员，请指向您的语言	如果您需要譯員，請指向您的語言



## Account # 9284



### Language Identification Survey

2004 Census Test	United States Census 2010 LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Խոսողում ենք Նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ឈ្មួញបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

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### Language Identification Survey (continued)

- |                                                                                                               |                    |
|---------------------------------------------------------------------------------------------------------------|--------------------|
| <input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.                                      | 13. French         |
| <input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.                | 14. German         |
| <input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.                            | 15. Greek          |
| <input type="checkbox"/> Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.                                | 16. Haitian Creole |
| <input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।                       | 17. Hindi          |
| <input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.                                | 18. Hmong          |
| <input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.                  | 19. Hungarian      |
| <input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.                    | 20. Ilocano        |
| <input type="checkbox"/> Marchi questa casella se legge o parla italiano.                                     | 21. Italian        |
| <input type="checkbox"/> 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       |
| <input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.                                                       | 23. Korean         |
| <input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.                                           | 24. Laotian        |
| <input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish         |

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### Language Identification Survey (continued)

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



**Appendix G**

**“One Moment Please” Tool**

## “One Moment Please” Tool

### How to Say “One Moment Please” in Eighteen Common Languages

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

Account # 9284



## **Appendix H**

### **Telephone-Based Interpretation Service**



## Telephone-Based Interpretation Service Access Instructions

### Over-the-phone Interpreting

**Dial the Interpreter:**  
**1-888-804-2044**

**The auto attendant will prompt:**

1. Spanish, press 1; all other languages, press 2
2. (If non-Spanish) enter the language code
3. Enter your 4-digit account number: **9284**  
*PA Department of Transportation*

**You will also be asked for:**

- Caller first and last name
- Site Number
- LES First Name and last initial

**For 3-way calls:**  
Ask the first person who answers (interpreter or operator) to place the call.

**Back-Up Interpreter Number: 1-866-386-1284**  
*(Only use if interpreter is unavailable at primary number above)*

language services **Client Support:** (888)-528-6692

Top Language Code Choices			
Language	code	Language	code
Albanian	47	Karenni	60
Amharic	39	Karen	34
Arabic	23	Korean	30
Bengali	48	Laotian	50
Bosnian	37	Mandarin	24
Burmese	21	Nepali	25
Cambodian	51	Portuguese	35
Cantonese	31	Punjabi	49
Chin	32	Russian	27
Farsi	33	Somali	29
French	26	Swahili	38
Gujarati	40	Tagalog	46
Haitian Creole	28	Thai	57
Hakka(chin)	87	Turkish	54
Hindi	43	Urdu	41
Hmong	44	Vietnamese	22
Italian	56	All other languages	99



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



Account # 9284

### TIPS

#### *How to Work with an Over-the-phone interpreter*

#### **Your role**

Over-the-phone interpreters may receive several calls a day—each one requiring special attention in a specific field. When working with an interpreter over the phone, there are a few things you should keep in mind to ensure your call is handled quickly and successfully.

- Always speak in first person, just as you would in normal conversation. For example, say, “Do you have a fever?” rather than “Ask her if she has a fever, please.”
- Immediately introduce yourself to the limited-English speaker (LES) client and explain your reason for calling.
- Telephone interpretation is “consecutive” interpretation. That means you will experience pauses when the interpreter repeats each statement in the respective language.
- After you speak a few sentences or finish a thought, pause to give the interpreter enough time to interpret.
- Be prepared to explain some things in more detail for the interpreter. Some terminology and concepts may not have an equivalent in the target language.
- Control the conversation. The interpreter is only there to interpret. You are responsible for making sure the LES client receives the same service as an English-speaking client.
- Ask the interpreter and the LES client questions to ensure they understand what you want to communicate.
- We can accommodate three-way telephone interpretation calls. Tell the call center agent the name and phone number of the third party, and they will arrange the call for you. The interpreter cannot facilitate this for you. You must ask the call center agent at the beginning of the call.
- Follow up by providing us with feedback about your interpretation services.

#### **Your interpreter’s role**

We expect interpreters to meet high standards and want to know when they are meeting expectations. To that end, your feedback is critical.

- Make sure your interpreter introduces himself/herself using a first name and ID number. They are not required to provide a last name.
- 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. This includes any advice that the client may ask of the interpreter.
- Your interpreter should not discuss anything unrelated to the telephone interpretation assignment.

More questions about over-the-phone interpretation? Contact us at 913-381-3143 or email [Interpreter@propio-ls.com](mailto:Interpreter@propio-ls.com).



**Appendix I**

**Human Translation & Interpretation Service Providers**



## Translation & Interpretation Service Providers

### *Local Services*

- The Lexiteria  
2459 Smoketown Road  
Lewisburg, Pennsylvania 17837  
Phone: (570) 522-0122
- Susquehanna University  
Amanda S. Meixell, Ph.D., Associate Professor of Spanish  
Phone: (570) 372-4258
- Bucknell University  
Fernando A. Blanco, Assistant Professor of Spanish  
Phone: (570) 577-3312
- Ron Radzai Translations  
1400 Taylorsville Road  
Ashland, PA 17921  
Phone: (570) 875-1770
- Accuprose Translations  
413 Hardscrabble Lane  
Lewisburg, PA 17837-8058  
Phone: (801) 380-0647

### *National and International Language Services*

#### Current PennDOT Provider:

- Propio Language Services  
<http://propio-ls.com/index.asp>  
*Provides telephone interpretation service only*

#### Other PennDOT Recommended Regional Providers:

- Quantum, Inc.  
240 South 9<sup>th</sup> Street  
Philadelphia, PA 19107  
<http://www.quantumtranslations.com/>
- Cetra  
7804 Montgomery Avenue, Suite 10  
Elkins Park, PA 19027  
<http://www.cetra.com/>



- ParaPlus  
2 Coleman Avenue #1  
Cherry Hill, NJ 08034  
<http://www.para-plus.com/>
- Language Services Consultants  
P.O. Box 412  
Ardmore, PA 19003  
<http://www.lsctranslations.com/welcome>

Web-Based National & International Providers:

- inWhatLanguage  
<http://www.inwhatlanguage.com/>
- Straker Translations  
<https://www.strakertranslations.com/>
- Net-Translations  
<https://www.net-translators.com/>

***West Germanic - Interpretation***

- Thomas Eshleman, Pastor  
Ruth Zimmerman, Administrative Assistant  
Groffdale Mennonite Church  
Phone: (717) 656-6388



## Watts, Robert

---

**From:** Kelly, Matthew <mattkelly@pa.gov>  
**Sent:** Friday, May 29, 2015 1:25 PM  
**To:** Watts, Robert  
**Subject:** (NEW) Translation for Documents  
**Attachments:** Vendors who Provide Translation Services.pdf

Bill, I sent this out yesterday to all the MPOs & RPOs and at the time forgot that I owed you a response..

ALCON,  
Interpretation/Translations

With a new contract comes some changes. Propio Language Service handles all of the “over the phone interpretation”, they *do not* provide translation services. I have attached a list of Vendors that can provide translation services for documents or anything written. You can call around to get a good price or I have put a check next to companies that we have used with positive results. Remember that you are a planning partner with PennDOT (Commonwealth of Pennsylvania) and you have the account number to use.

If you have any further question, just give me a call.

**Matthew G Kelly** | Title VI Specialist  
PA Department of Transportation | Bureau of Equal Opportunity  
DBE/Title VI Division  
400 North Street | Harrisburg, PA 17120  
Desk Phone: 717.783.1370  
Toll Free: 800.468.4201  
Fax: 717.772.4026  
[www.dot.state.pa.us](http://www.dot.state.pa.us)





**Appendix J**

**Community & Agency Contacts**



## Community & Agency Contacts

### *West Germanic – Community and Agency Contacts*

- Bill Gomes  
Mifflin County Planning Office  
Phone: (717) 242-0887  
Email: [mcplanning@co.mifflin.pa.us](mailto:mcplanning@co.mifflin.pa.us)
- Betty Hartzler  
Mennonite Heritage Center  
Phone: (717) 935-9956  
Email: [hartzlerk@chilitech.com](mailto:hartzlerk@chilitech.com)
- Evonne E. "Vonnie" Henninger  
Penns Valley Area Historical Museum  
Phone: (814) 349-8960  
Email: [eeh1@psu.edu](mailto:eeh1@psu.edu)
- Shawn McLaughlin  
Union County Planning Office  
Phone: (570) 524-3840  
Email: [smclaughlin@unionco.org](mailto:smclaughlin@unionco.org)

### *Spanish – Community Contacts*

- Christopher Donahue, Chairperson  
Department of Languages & Cultures  
Bloomsburg University of Pennsylvania  
Bloomsburg, PA  
Phone: (570) 389-4715  
Email: [cdonahue@bloomu.edu](mailto:cdonahue@bloomu.edu)

### *Spanish – Church Contacts*

- United Pentecostal Church  
(Iglesia Pentecostal Unida)  
Lewisburg, PA  
Phone: (570) 524-5445  
Web: <http://www.upclewisburg.com/>
- Saint Jude Thaddeus Parish  
Mifflintown, PA  
Phone: (717) 436-6722  
Email: [StJudeThaddeusParishMifflintown@hbgdiocese.org](mailto:StJudeThaddeusParishMifflintown@hbgdiocese.org)  
Web: <http://www.hbgdiocese.org/parish/st-jude-thaddeus-mifflintown/>



- St. Joseph Church  
Milton, PA  
Phone: (570) 742-4356  
Email: [StJudeThaddeusParishMifflintown@hbgdiocese.org](mailto:StJudeThaddeusParishMifflintown@hbgdiocese.org)  
Web: <http://www.stjosephmilton.org/>
  
- Immaculate Conception Roman Catholic Church  
Berwick, PA  
Phone: (570) 759-8113  
Email: [ImmaculateConceptionBVMParishBerwick@hbgdiocese.org](mailto:ImmaculateConceptionBVMParishBerwick@hbgdiocese.org)  
Web: <http://www.stmarysberwick.com/>



**Appendix K**

**Verification of Google Translate Performance**



## Verification of Google Translate Performance

While Google Translate can be a useful tool for obtaining automatic translation results, the USDOT/Federal Highway Administration has noted the need for all agencies receiving federal assistance to verify the accuracy of any automated translation. Therefore, seven (7) of the MPO's primary pages were translated automatically using Google Translate. A bilingual translator verified the results. The MPO webpages were sampled on October 14, 2014.

Based on the analysis of these pages, Google Translate provides a passing Spanish translation in spite of consistent translation errors. The following categories of issues were identified

- Incorrect translation
- Lack of translation
- Unnecessary translation
- Punctuation Issues
- Inaccurate acronym translation
- Subject/modifier translation error
- Capitalization error
- Improper tense
- Individual/plurality issue
- Feminine/masculine word error

The issues on specific webpages were as follows:

Webpage Title	Summary of Issues
Metropolitan Planning Organization	<ul style="list-style-type: none"> <li>• 1 Punctuation issue</li> <li>• 2 Incorrect translations</li> <li>• 4 Subject/Modifier translation errors</li> <li>• 1 Unnecessary translation</li> <li>• 2 Lack of translations</li> <li>• 18 Inaccurate acronym translations</li> </ul>
Long Range Transportation Plan	<ul style="list-style-type: none"> <li>• 10 inaccurate acronym translations</li> <li>• 1 Punctuation Issue</li> <li>• 2 Capitalization Errors</li> <li>• 1 Subject/Modifier translation error</li> </ul>
Transportation Alternatives Program	<ul style="list-style-type: none"> <li>• 6 Subject/Modifier translation errors</li> <li>• 1 Feminine/Masculine word error</li> <li>• 3 Punctuation Issues</li> <li>• 9 Lack of translations</li> <li>• 1 Unnecessary translation</li> <li>• 15 Inaccurate acronym translations</li> </ul>



Webpage Title	Summary of Errors
Public Participation Plan	<ul style="list-style-type: none"> <li>• 6 Incorrect Translations</li> <li>• 4 Subject/Modifier translation errors</li> <li>• 2 Unnecessary translations</li> <li>• 1 Tense issue</li> <li>• 1 Individual/plurality issue</li> <li>• 10 Inaccurate acronym translations</li> </ul>
Public Participation Plan	<ul style="list-style-type: none"> <li>• 6 Incorrect Translations</li> <li>• 4 Subject/Modifier translation errors</li> <li>• 2 Unnecessary translations</li> <li>• 1 Tense issue</li> <li>• 1 Individual/plurality issue</li> <li>• 10 Inaccurate acronym translations</li> </ul>
Regional Gas Utilization	<ul style="list-style-type: none"> <li>• 1 Punctuation issue</li> <li>• 1 Incorrect translation</li> <li>• 1 Feminine/Masculine word error</li> </ul>
LTAP	<ul style="list-style-type: none"> <li>• 6 Incorrect translations</li> <li>• 6 Capitalization issues</li> <li>• 2 Inaccurate acronym translations</li> <li>• 11 Subject/Modifier translation errors</li> <li>• 6 Lack of translations</li> <li>• 4 Punctuation issues</li> </ul>
Freight Planning	<ul style="list-style-type: none"> <li>• 3 Incorrect acronym translations</li> <li>• 5 Incorrect translations</li> <li>• 2 Subject/Modifier translation errors</li> <li>• 1 Punctuation issue</li> </ul>



**Appendix L**

**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**

<b>LEP Plan Status</b>	
Is SEDA-COG MPO receiving federal funding?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Interactions with LEP Persons</b>	
Has SEDA-COG MPO interacted with any LEP persons during the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> 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)
<b>Identifying LEP Communities</b>	
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How often is the language data for SEDA-COG MPO's service area analyzed?	<b>Once every _____ years.</b>
What techniques and resources are used by SEDA-COG MPO to identify LEP communities? (e.g., spatial mapping, community input, etc.)	<b>Describe:</b> _____ _____ _____ _____ _____



## Limited English Proficiency Plan Self-Assessment Checklist

(Continued, Page 2 of 4)

### 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	<input type="checkbox"/> Increasing <input type="checkbox"/> 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	<input type="checkbox"/> Increasing <input type="checkbox"/> Decreasing
1.			
2.			
3.			
4.			
5.			



## Limited English Proficiency Plan Self-Assessment Checklist

(Continued, Page 3 of 4)

<b>Providing Notice of Language Assistance</b>	
<p>How does SEDA-COG MPO inform the public about the availability of language assistance services? (e.g., posters, website, etc.)?</p>	<p><b>Describe:</b> _____</p> <p>_____</p> <p>_____</p>
<p>In what language(s) does SEDA-COG MPO advertise language assistance services?</p>	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p>
<b>Providing Language Assistance</b>	
<p>For the Safe Harbor LEP populations, what vital documents are translated?</p>	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p>
<p>Does SEDA-COG MPO offer automated translation services on its website?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>If so, what services are currently in use?</p>	<p><input type="checkbox"/> Google Translate</p> <p><input type="checkbox"/> Bing Translator</p> <p><input type="checkbox"/> Other: _____</p> <p><input type="checkbox"/> Other: _____</p>
<p>What are the top three (3) languages for which translation are most requested?</p>	<p>1. _____</p> <p>2. _____</p> <p>3. _____</p>



## Limited English Proficiency Plan Self-Assessment Checklist

(Continued, Page 4 of 4)

<b>Training &amp; Staff Resources</b>	
<p>How does SEDA-COG MPO train staff for interacting with LEP persons? (e.g., identify language spoken, handle translation requests, access interpretation services)</p>	<p><b>Describe:</b> _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<b>Monitoring and Updating the Language Assistance Plan</b>	
<p>Is the LEP Plan and LAP available to the public for review? If yes, where is it available?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>If so, where is it available?</p>	<p><b>Describe:</b> _____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>How often is the LAP updated (i.e., annually, biennially, etc.)?</p>	<p><input type="checkbox"/> Annually</p> <p><input type="checkbox"/> Biennially</p> <p><input type="checkbox"/> Every 3 years</p> <p><input type="checkbox"/> Every 4 years</p> <p><input type="checkbox"/> Every _____ years</p>
<p>When was the LAP last updated?</p>	<p><b>Date:</b> _____</p>



## LEP Interaction Tracking Form Record of Interactions

Year: \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_

Interaction Tracking <i>(to be filled out after each interaction with an LEP Individual)</i>							
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
West Germanic	
Spanish	

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

