



SEDA-COG METROPOLITAN PLANNING ORGANIZATION TITLE VI PROGRAM

DRAFT: April 1, 2022



SEDA-Council of Governments (SEDA-COG) Metropolitan Planning Organization (MPO)

SEDA-COG is the designated Metropolitan Planning Organization (MPO) for the following eight counties: Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union. The MPO's vision for the 8-county region is an integrated intermodal transportation system that facilitates the efficient and safe movement of people and goods while maintaining the region's character, enhancing the quality of life, and strengthening economic vitality.

SEDA-COG Metropolitan Planning Organization

James Saylor, Program Director

Transportation Planning

SEDA-COG

201 Furnace Road

Lewisburg, PA 17837

(570) 524-4491

www.seda-cog.org

TITLE VI COMPLIANCE | *The SEDA-COG MPO fully complies with Title VI of the Civil Rights Act of 1964, Executive Order 12898 on Environmental Justice, and related nondiscrimination mandates in all its programs and activities. SEDA-COG's website, www.seda-cog.org, may be translated into multiple languages. Publications and other public documents can be made available in alternative languages and formats, if requested. SEDA-COG MPO's public meetings are held in ADA-accessible facilities. Translation, interpretation, or other auxiliary services can be provided to individuals who submit a request at least five days prior to a public meeting. Translation and interpretation services for SEDA-COG MPO's projects, products, and planning processes are available by calling (570) 524-4491. All requests will be accommodated to the greatest extent possible. Any person who believes they have been aggrieved by a discriminatory practice by SEDA-COG under Title VI has a right to file a formal complaint. Any such complaint must be in writing and filed with the SEDA-COG MPO's Title VI Compliance Officer and/or the appropriate state or federal agency within 180 days of the alleged discriminatory occurrence. For more information on SEDA-COG's Title VI program or to obtain a Title VI Complaint Form, please visit: www.seda-cog.org, or call (570) 524-4491.*

The SEDA-COG MPO is funded by a variety of funding sources including grants from the U.S. Department of Transportation's Federal Highway Administration and Federal Transit Administration, the Pennsylvania Department of Transportation, as well as by SEDA-COG's local member governments. The contents of this report do not necessarily reflect the official views or policies of the funding agencies.

Language Taglines

English

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

Español

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

中文

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

Tiếng Việt

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

한국어

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

Deutsche

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

About the SEDA-COG MPO

The SEDA-COG Metropolitan Planning Organization (MPO) is the official transportation planning organization for eight (8) central Pennsylvania counties: Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union. Federal law and regulations require that a Metropolitan Planning Organization be designated for urbanized areas with a population of 50,000 or more, to manage the distribution of federal transportation funds through a comprehensive, continuous, and cooperative planning process. The 2010 decennial Census resulted in a new urbanized area (UZA) determination that required the formation of an MPO for the affected Bloomsburg-Berwick UZA. Local and state parties agreed to make the MPO coverage area contain the entirety of the 8 counties listed above.

The SEDA-COG MPO operates via an agreement with PennDOT to approve studies and capital improvements for highways, bridges, transit, railroads, bicycle/pedestrian facilities, and other transportation interests. Five primary documents are developed, approved, and maintained by the MPO: the region's Long-Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), Public Participation Plan (PPP), and Coordinated Public Transit-Human Services Transportation Plan. The SEDA-COG MPO completes its planning processes in close cooperation with local governments, PennDOT, the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA). In executing its work, the MPO strives to help provide a balanced transportation system for the maximum benefit of people, businesses, and communities in the region.

Consistent with its bylaws, the SEDA-COG MPO's governing body consists of 17 voting members: one representative from each of the eight member counties (typically the county planning director); three representatives from PennDOT (Engineering District 2-0, Engineering District 3-0, and Central Office); one representative from transit; one representative from multi-modal interests; one representative from the SEDA-COG Board; one representative from SEDA-COG's Transportation Program; one representative from the largest municipality (by population) in the Bloomsburg-Berwick UZA; and one representative from the 2nd largest municipality (by population) in the Bloomsburg-Berwick UZA. In addition to the 17 voting members, the MPO includes non-voting members such as Lycoming County officials, Centre County officials, Luzerne County officials, FHWA officials, FTA officials, SEDA-COG staff, other state and federal resource agencies, and private citizens with an interest in transportation and economic development throughout the region. The staff of the SEDA-COG Transportation Program serves as the staff and advisors to the SEDA-COG MPO. The staff lead development of the MPO products and perform transportation planning activities, as defined through the MPO UPWP, in support of federal, state, and local priorities.

Overview of Title VI Requirements

As a recipient of federal funding for transportation-related projects and programs, SEDA-COG MPO is subject to a variety of federal laws, statutes, and presidential Executive Orders. Specific to this document is Title VI of the Civil Rights Act of 1964, which provides that:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The Federal Transit Administration (FTA) is responsible for ensuring that federally supported transit services and related benefits are distributed by recipients of FTA assistance in a manner consistent with Title VI. The FTA Title VI requirements are defined in FTA Circular 4702.1B, dated October 1, 2012. The guidance included in this Circular is designed to help FTA recipients to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

The SEDA-COG MPO is a subrecipient of FTA planning funds passed through to the MPO by PennDOT. As a subrecipient of federal funds, SEDA-COG MPO certifies that it will comply with Title VI of the Civil Rights Act of 1964. FTA Circular C4702.1B, dated October 1, 2012, specifies information the SEDA-COG MPO must include in its Title VI Program. The SEDA-COG MPO shall submit to PennDOT as the primary recipient, and to FTA, the following general requirements (set out in Chapter III of the Circular) and MPO-specific requirements (set out in Chapter VI of the Circular) as part of its Title VI Program:

- A. Title VI Notice to the Public, including a list of locations where the notice is posted
- B. Title VI Complaint Procedures
- C. Title VI Complaint Form
- D. List of transit-related Title VI investigations, complaints, and lawsuits
- E. Public Participation Plan
- F. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP)
- G. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage participation of minorities on such committees
- H. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- I. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- J. A copy of the board meeting minutes or resolution showing the board of directors reviewed and approved the Title VI Program
- K. Demographic profile of the metropolitan area
- L. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
- M. Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- N. Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts

The following pages include the requirements listed above.

Title VI Program Requirements

The following descriptions and pertinent appendix items address the information that must be included in the SEDA-COG MPO's Title VI Program. The information should be reviewed at least every three years and submitted to PennDOT and FTA.

A. Title VI Notice to the Public

The SEDA-COG MPO's Title VI notice to the public indicates that the MPO complies with Title VI and informs the public of the protections against discrimination afforded by Title VI. The public notice can be found on the SEDA-COG website and is also posted at the primary physical address of the SEDA-COG MPO (201 Furnace Road, Lewisburg, PA 17837). The Title VI notice is provided in English and Spanish versions.

Appendix A contains copies of the Title VI Notice to the Public (English and Spanish versions).

B. Title VI Complaint Procedures

The SEDA-COG MPO has prepared Title VI Complaint Procedures that provide instructions to the public regarding how to file a Title VI discrimination complaint. The complaint procedures can be found on the SEDA-COG website and posted at the primary physical address of the SEDA-COG MPO (201 Furnace Road, Lewisburg, PA 17837). The Title VI Complaint Procedures are provided in English and Spanish versions.

Appendix B contains copies of the Title VI Complaint Procedures (English and Spanish versions).

C. Title VI Complaint Form

The SEDA-COG MPO has prepared a Title VI Complaint Form that can be used for filing a Title VI complaint. The complaint form can be found on the SEDA-COG website and posted at the primary physical address of the SEDA-COG MPO (201 Furnace Road, Lewisburg, PA 17837). The Title VI Complaint Form is provided in English and Spanish versions.

Appendix C contains copies of the Title VI Complaint Form (English and Spanish versions).

D. Title VI Complaint Log

During the previous three-year period, no Title VI or other discrimination or civil rights investigations, complaints, or lawsuits have been recorded against the SEDA-COG MPO. The SEDA-COG MPO Title VI Complaint Log is available to MPO staff for recording any complaints that might be filed.

Appendix D contains a copy of the Title VI Complaint Log that will be used for recording any investigations, complaints, or lawsuits that allege discrimination on the basis of race, color, or national origin.

E. Public Participation Plan

The SEDA-COG MPO has a Public Participation Plan (PPP) that includes information regarding outreach methods to engage minority and limited English proficient populations. The PPP can be found on the SEDA-COG website and at the primary physical address of the SEDA-COG MPO (201 Furnace Road, Lewisburg, PA 17837).

Appendix E contains a copy of the Public Participation Plan.

F. Language Assistance Plan (Limited English Proficiency Plan)

The SEDA-COG MPO has a Limited English Proficiency (LEP) Plan that details how language assistance will be provided to LEP persons. The LEP Plan is found on the SEDA-COG website and at the primary physical address of the SEDA-COG MPO (201 Furnace Road, Lewisburg, PA 17837).

Appendix F contains a copy of the Limited English Proficiency Plan.

G. Minority Representation on Planning and Advisory Bodies

As per its bylaws, the governing body of the SEDA-COG MPO is the Coordinating Committee, which consists of 17 voting members. The Coordinating Committee takes formal action to adopt MPO plans and programs. The MPO does not self-appoint its membership – members of the Coordinating Committee are appointed by their respective representative bodies. Should the need arise, the Coordinating Committee may be assisted in its activities by a Technical Committee that could provide recommendations on transportation strategies or projects. The members of the Technical Committee would be appointed by the same representative bodies that appoint members to the Coordinating Committee. The MPO may establish and abolish subcommittees as needed. A new subcommittee that the MPO is contemplating is the creation of a Public Participation Panel (to include representatives of traditionally underserved populations) that would assist the MPO in implementing public outreach strategies and empowering citizens to get involved in regional planning.

Appendix G contains copies of:

- SEDA-COG MPO Coordinating Committee Membership (Committee Representation)
- SEDA-COG MPO Coordinating Committee Membership (Race/Gender Breakdown)
- Sample Letter Soliciting Coordinating Committee Membership

H. Agency Monitoring of Subrecipients

This section is not applicable to the SEDA-COG MPO, since the SEDA-COG MPO does not currently pass any federal funding assistance through to subrecipients. Should this change in the future, the SEDA-COG MPO fully commits to providing all required monitoring and assistance to any subrecipients to ensure they are complying with Title VI.

I. Title VI Equity Analysis

This section is not applicable to the SEDA-COG MPO, since the SEDA-COG MPO does not construct or determine the site or location of facilities, such as a transit vehicle storage facility, maintenance facility, operation center, etc. Should this change in the future, the SEDA-COG MPO fully commits to nondiscrimination and will conduct a Title VI equity analysis during the planning stage for facilities.

J. Board Adoption of MPO Title VI Program

The SEDA-COG MPO will adopt the Title VI Program on June 10, 2022.

Appendix H contains a draft copy of the resolution for documenting adoption of the Title VI Program at a meeting to be held on June 10, 2022.

K. Demographic Profile of the Metropolitan Area

With every update to the Transportation Improvement Program (TIP), the SEDA-COG MPO completes an Environmental Justice Benefits and Burdens Analysis document that includes identification of the locations of minority populations in the aggregate. This summary document includes profile tables, mapping, and analysis conducted to identify the locations and concentrations of minority, low-income and other traditionally underserved populations.

Appendix I contains a copy of the Environmental Justice Benefits and Burdens Analysis document completed for the FFY 2023-2026 SEDA-COG TIP.

L. Procedures to Identify and Consider the Mobility Needs of Minority Populations

Throughout all the processes conducted by the SEDA-COG MPO, an attempt is made to ensure that equal access is provided in planning programs and projects. This includes (but is not limited to) meeting accessibility, outreach processes described in the MPO Public Participation Plan, TIP development, LRTP development, Environmental Justice analysis, transit planning, bicycle/pedestrian planning, PennDOT Connects consultation, coordination with human service agencies, etc.

Appendix E contains a copy of the MPO Public Participation Plan that includes information regarding outreach methods to engage minority populations and better identify/consider their mobility needs.

Appendix I contains a copy of the Environmental Justice Benefits and Burdens Analysis document completed for the FFY 2023-2026 SEDA-COG TIP, which also describes relevant procedures for identifying and considering the mobility needs of minority populations.

M. Demographic Maps Overlaying the Percent Minority and Non-minority Populations and Showing Distribution of State and Federal Funds for Public Transportation Projects

The SEDA-COG MPO includes such maps and charts in the Environmental Justice Benefits and Burdens Analysis document prepared for each TIP update. The mapping displays concentrations of minority and low-income populations across several considerations, including maps showing the routes for the lone

fixed-route transit system in the MPO region and the location of TIP-funded projects (including transit projects). The document also has tables that show the value of the transit projects on the TIP.

Appendix I contains a copy of the Environmental Justice Benefits and Burdens Analysis document completed for the FFY 2023-2026 SEDA-COG TIP, which includes the pertinent maps and tables.

N. Analysis of the MPO's Transportation System Investments that Identifies and Addresses Any Disparate Impacts

The SEDA-COG MPO includes such an analysis in the Environmental Justice Benefits and Burdens Analysis document prepared for each TIP update.

Appendix I contains a copy of the Environmental Justice Benefits and Burdens Analysis document completed for the FFY 2023-2026 SEDA-COG TIP, which includes the pertinent analysis.

APPENDIX A
Title VI Notice to the Public

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

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

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

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

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

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

SEDA-COG ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (MPO)
TÍTULO VI AVISO AL PÚBLICO

La Organización de Planificación Metropolitana (MPO) de SEDA-COG por la presente notifica que es política de la MPO de SEDA-COG asegurar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, Orden Ejecutiva 12898 sobre Justicia Ambiental, y estatutos y reglamentos relacionados en todos los programas y actividades. El Título VI exige que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de la participación, se le nieguen los beneficios o sea objeto de discriminación en cualquier programa o actividad administrada por el SEDA-COG MPO.

Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria bajo el Título VI tiene derecho a presentar una queja formal ante la MPO de SEDA-COG. Cualquier queja de este tipo debe ser por escrito y presentada ante el Oficial de Cumplimiento del Título VI de SEDA-COG MPO dentro de los ciento ochenta (180) días posteriores a la fecha del presunto incidente discriminatorio. Se puede obtener un Formulario de Queja por Discriminación del Título VI de SEDA-COG MPO llamando al 570-524-4491 o enlazando al [Formulario de Queja por Discriminación](#) de la MPO.

Este aviso se publica en la oficina de SEDA-COG (la dirección física se muestra a continuación) y en el sitio web de SEDA-COG. Para obtener más información sobre el Programa Título VI de SEDA-COG MPO o los procedimientos para presentar una queja, comuníquese con:

Steve Herman, AICP
Oficial de Cumplimiento del Título VI
SEDA-COG MPO
201 Furnace Road
Lewisburg, PA 17837
(570) 524-4491
sherman@seda-cog.org
www.seda-cog.org

Si necesita información en otro idioma, llame al 570-524-4491 (TTY: 711) para obtener información sobre los servicios de asistencia lingüística.

APPENDIX B
Title VI Complaint Procedures

SEDA-COG METROPOLITAN PLANNING ORGANIZATION (MPO)
TITLE VI COMPLAINT PROCEDURES
(English)

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

- The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.
1. Complaints shall be in writing and signed by the Complainant or the Complainant's representative. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by phone can be reduced to writing as an accommodation upon request and provided to the complainant for confirmation or revision and signature before processing. Complainants can also use the MPO's Title VI Complaint Form available on the SEDA-COG website.
 2. Generally, the written complaint should include the following information:
 - a. Name, address, and telephone number of the Complainant.
 - b. Basis of the complaint (e.g., race, color, national origin, sex, age, disability or retaliation).
 - c. A detailed description of the circumstances of the incident that lead the Complainant to believe discrimination occurred.
 - d. Name, title, and address of the person(s) who discriminated against the Complainant.
 - e. Name, address, and phone number of any person(s) who may have knowledge of the alleged incident or are perceived as parties in the complained-of-incident.
 - f. Date or dates on which the alleged discrimination occurred.
 - g. Other agencies where the complaint was filed.
 3. If the MPO receives a complaint, the Title VI Compliance Officer will acknowledge receipt of the complaint by notifying the Complainant within 10 business days and transmitting the complaint to the proper federal or state agency (e.g., Federal Highway Administration, Federal Transit Administration, or PennDOT) for investigation and disposition pursuant to that agency's Title VI complaint procedures.
 4. Although these procedures do not preclude the MPO from attempting to informally resolve complaints, the decision to resolve informally always rests with the Complainant, who may withdraw from the informal process at any time.

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

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

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

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

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

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

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

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

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

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

SEDA-COG ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (MPO)
TÍTULO VI PROCEDIMIENTOS DE QUEJAS
(Español)

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

- La fecha del presunto acto de discriminación; o
 - La fecha en que la(s) persona(s) se dieron cuenta de la supuesta discriminación; o
 - Cuando ha habido un curso continuo de conducta, la fecha en que se interrumpió esa conducta o la última instancia de la conducta.
1. Las quejas deberán ser por escrito y firmadas por el Demandante o el representante del Demandante. Las quejas recibidas por fax o correo electrónico serán reconocidas y procesadas. Las denuncias recibidas por teléfono pueden reducirse a escribir como una adaptación a pedido y entregarse al denunciante para su confirmación o revisión y firma antes del procesamiento. Los denunciantes también pueden usar el formulario de denuncia del Título VI de la MPO disponible en el sitio web de SEDA-COG.
 2. En general, la queja por escrito debe incluir la siguiente información:
 - a. Nombre, dirección y número de teléfono del denunciante.
 - b. Base de la denuncia (p. ej., raza, color, origen nacional, sexo, edad, discapacidad o represalia).
 - c. Una descripción detallada de las circunstancias del incidente que llevan al Demandante a creer que ocurrió discriminación.
 - d. Nombre, cargo y dirección de la(s) persona(s) que discriminaron al denunciante.
 - e. Nombre, dirección y número de teléfono de cualquier persona que pueda tener conocimiento del presunto incidente o que se perciba como parte del incidente denunciado.
 - f. Fecha o fechas en que ocurrió la supuesta discriminación.
 - g. Otras agencias donde se presentó la denuncia.
 3. Si la MPO recibe una queja, el Oficial de Cumplimiento del Título VI acusará recibo de la queja notificando al Demandante dentro de los 10 días hábiles y transmitiendo la queja a la agencia federal o estatal correspondiente (por ejemplo, Administración Federal de Carreteras, Administración Federal de Tránsito o PennDOT) para su investigación y disposición de conformidad con los procedimientos de denuncia del Título VI de esa agencia.

4. Aunque estos procedimientos no impiden que la MPO intente resolver las quejas de manera informal, la decisión de resolverlas de manera informal siempre recae en el Demandante, quien puede retirarse del proceso informal en cualquier momento.
5. Estos procedimientos se aplican a todas las quejas externas sobre discriminación por motivos de raza, color, origen nacional (incluido el dominio limitado del inglés), edad, sexo, credo religioso o discapacidad relacionada con cualquier programa o actividad administrada por la MPO y/o sus beneficiarios. , consultores y contratistas, presentados bajo el Título VI (incluidos sus componentes de Empresas Comerciales en Desventaja e Igualdad de Oportunidades en el Empleo), así como otras leyes relacionadas que incluyen, entre otras, la Sección 504 de la Ley de Rehabilitación de 1973, la Ley de Restauración de los Derechos Civiles de 1987, y la Ley de Estadounidenses con Discapacidades de 1990.
6. El Oficial de Cumplimiento del Título VI de la MPO mantendrá un registro de todas las quejas recibidas por la MPO.

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

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

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

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

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

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

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

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

APPENDIX C
Title VI Complaint Form



DISCRIMINATION COMPLAINT FORM

Name	Phone	Name of Person(s) That Discriminated Against You
Address (Street No., P.O. Box, etc.)		Location and Position of Person (If Known)
City, State, Zip		City, State, Zip
Discrimination Because of: <input type="checkbox"/> Race/Color* <input type="checkbox"/> Sex <input type="checkbox"/> Disability** <input type="checkbox"/> Age <input type="checkbox"/> National Origin* <input type="checkbox"/> Retaliation <input type="checkbox"/> Religion		Date(s) of Alleged Incident(s)
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also, attach any written material pertaining to your case.		
Signature		Date

Please submit this form to one of the following agencies:

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

Nombre	Teléfono	Nombre de la(s) persona(s) que lo discriminaron
Dirección (Número de calle, apartado de correos, etc.)		Ubicación y posición de la persona (si se conoce)
Ciudad, Estado, Código Postal		Ciudad, Estado, Código Postal
Discriminación por: <input type="checkbox"/> Raza/Color* <input type="checkbox"/> Sexo <input type="checkbox"/> Discapacidad ** <input type="checkbox"/> Años <input type="checkbox"/> Origen nacional* <input type="checkbox"/> Represalias <input type="checkbox"/> Religión		Fecha(s) del incidente(s) alegado(s)
Explique lo más breve y claramente posible lo que sucedió y cómo fue discriminado. Indique quién estuvo involucrado. Asegúrese de incluir cómo otras personas fueron tratadas de manera diferente a usted. Además, adjunte cualquier material escrito relacionado con su caso.		
Firma		Fecha

Envíe este formulario a una de las siguientes agencias:

<p>SEDA-COG Organización de Planificación Metropolitana</p> <p><i>Oficial de Cumplimiento del Título VI</i></p> <p>201 Furnace Road Lewisburg, PA 17837 Phone: (570) 524-4491</p> <p>Correo electrónico: information@seda-cog.org</p> <p>Page 20 of 230</p>	<p>Departamento de Transporte de Pensilvania</p> <p><i>Oficina de Igualdad de Oportunidades</i></p> <p>P.O. Box 3251 Harrisburg, PA 17105-3251 Phone: (800) 468-4201</p> <p>Correo electrónico: penndoteoreports@pa.gov</p>	<p>Administración Federal de Carreteras</p> <p><i>Especialista en Igualdad de Oportunidades</i></p> <p>Pennsylvania Division Office 228 Walnut Street, Room 508 Harrisburg, PA 17101-1720</p> <p>Teléfono: (717) 221-3705</p>	<p>Departamento de Justicia de EE. UU.</p> <p><i>Programas de la Oficina de Justicia</i></p> <p>Office for Civil Rights 810 7th Street, NW Washington, DC 20531</p> <p>Teléfono: (202) 307-0690 Teléfono (TDD): 202-307-2027</p>
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*indica es específico al Título VI de la Ley de Derechos Civiles de 1964 **indica que es específico de la Ley de Estadounidenses con Discapacidades de 1990.

APPENDIX D
Title VI Complaint Log

APPENDIX E
Public Participation Plan



SEDA-COG MPO PUBLIC PARTICIPATION PLAN

**A Ready Reference Guide to Public Involvement for Planning Activities
in the SEDA-COG Metropolitan Planning Organization (MPO) Region**

Prepared by:

SEDA-COG MPO

201 Furnace Road
Lewisburg, PA 17837
www.seda-cog.org

DRAFT: April 1, 2022



SEDA-Council of Governments (SEDA-COG) Metropolitan Planning Organization (MPO)

SEDA-COG is the designated Metropolitan Planning Organization (MPO) for the following eight counties: Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union. The MPO's vision for the 8-county region is an integrated intermodal transportation system that facilitates the efficient and safe movement of people and goods while maintaining the region's character, enhancing the quality of life, and strengthening economic vitality.

SEDA-COG Metropolitan Planning Organization

Steve Herman, Program Director

Transportation Planning

SEDA-COG

201 Furnace Road

Lewisburg, PA 17837

(570) 524-4491

www.seda-cog.org

TITLE VI COMPLIANCE | *The SEDA-COG MPO fully complies with Title VI of the Civil Rights Act of 1964, Executive Order 12898 on Environmental Justice, and related nondiscrimination mandates in all its programs and activities. SEDA-COG's website, www.seda-cog.org, may be translated into multiple languages. Publications and other public documents can be made available in alternative languages and formats, if requested. SEDA-COG MPO's public meetings are held in ADA-accessible facilities. Translation, interpretation, or other auxiliary services can be provided to individuals who submit a request at least five days prior to a public meeting. Translation and interpretation services for SEDA-COG MPO's projects, products, and planning processes are available by calling (570) 524-4491. All requests will be accommodated to the greatest extent possible. Any person who believes they have been aggrieved by a discriminatory practice by SEDA-COG under Title VI has a right to file a formal complaint. Any such complaint must be in writing and filed with the SEDA-COG MPO's Title VI Compliance Officer and/or the appropriate state or federal agency within 180 days of the alleged discriminatory occurrence. For more information on SEDA-COG's Title VI program or to obtain a Title VI Complaint Form, please visit: www.seda-cog.org, or call (570) 524-4491.*

The SEDA-COG MPO is funded by a variety of funding sources including grants from the U.S. Department of Transportation's Federal Highway Administration and Federal Transit Administration, the Pennsylvania Department of Transportation, as well as by SEDA-COG's local member governments. The contents of this report do not necessarily reflect the official views or policies of the funding agencies.

Language Taglines

English

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

Español

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

中文

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

Tiếng Việt

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

한국어

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

Deutsche

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

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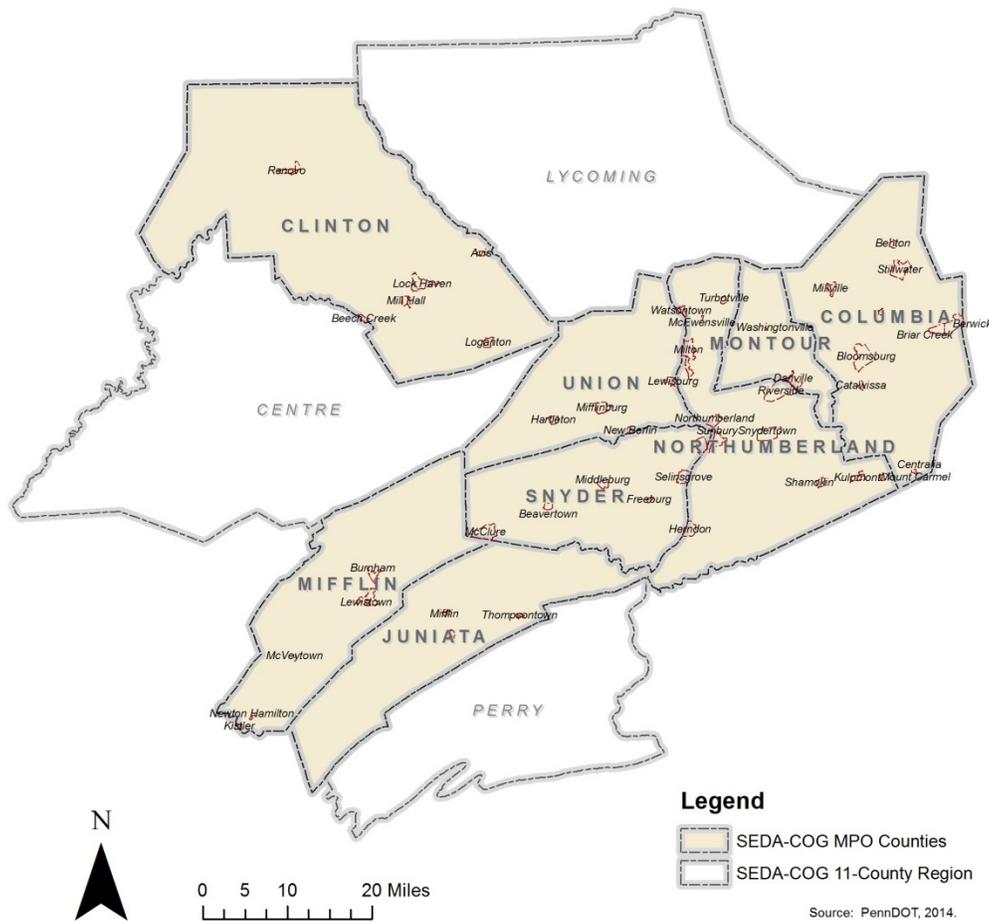
TRANSPORTATION ACRONYMS

ACM	Agency Coordination Meeting
ADA	Americans with Disabilities Act of 1990
EJ	Environmental Justice
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GIS	Geographic Information System
LAP	Language Assistance Plan
LEP	Limited English Proficiency
L RTP	Long-Range Transportation Plan
MPMS	Multimodal Project Management System
MPO	Metropolitan Planning Organization
PennDOT	Pennsylvania Department of Transportation
PPP	Public Participation Plan
SEDA-COG	SEDA-Council of Governments
STIP	Statewide Transportation Improvement Program
TIP	Transportation Improvement Program
UZA	Urbanized Area
UPWP	Unified Planning Work Program
USDOT	United States Department of Transportation

1. OVERVIEW

About SEDA-COG

SEDA-Council of Governments (SEDA-COG) is a multi-faceted public development organization serving 11 counties in central Pennsylvania. SEDA-COG’s mission is to enhance the quality of life and economic advantage for residents and businesses in the 11-county region through its vital partnerships and initiatives. Policies are established by a 22-member Board and carried out by a professional staff with expertise in a wide range of fields. SEDA-COG is committed to working with the region’s counties, communities, companies, and individuals to enhance growth opportunities in an environmentally sensitive manner, while retaining the region's predominantly rural character.



The SEDA-COG Metropolitan Planning Organization

The SEDA-COG Metropolitan Planning Organization (MPO) is the official transportation planning organization for eight (8) Central Pennsylvania Counties—Clinton, Columbia, Juniata, Mifflin,

Montour, Northumberland, Snyder, Union—as designated by the Commonwealth of Pennsylvania on March 27, 2013. Prior to that date, these counties were part of the SEDA-COG Rural Planning Organization (RPO). The 2010 decennial Census resulted in a new urbanized area (UZA) determination that required the formation of an MPO for the affected Bloomsburg-Berwick UZA. Local and state parties agreed to make the MPO coverage contain the entirety of the 8 counties listed above.

The SEDA-COG MPO operates via an agreement with PennDOT to approve studies and capital improvements for highways, bridges, transit, railroads, bicycle/pedestrian facilities, and other transportation concerns. Four primary documents are developed and approved by the MPO: the region’s Long-Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), Public Participation Plan (PPP), and Unified Planning Work Program (UPWP). In executing its work, the MPO strives to help provide a balanced transportation system for the maximum benefit of people, businesses, and communities in the region.

Consistent with its bylaws, the SEDA-COG MPO’s governing body consists of 17 voting members: one representative from each of the eight member counties (typically the county planning director); three representatives from PennDOT (Engineering District 2-0, Engineering District 3-0, and Central Office); one representative from transit; one representative from multi-modal interests; one representative from the SEDA-COG Board; one representative from SEDA-COG’s Transportation Program; one representative from the largest municipality (by population) in the Bloomsburg-Berwick UZA; and one representative from the 2nd largest municipality (by population) in the Bloomsburg-Berwick UZA. In addition to the 17 voting members, the MPO includes non-voting members. Such non-voting members receive MPO reports and agendas and may participate in MPO discussions. Non-voting members include, among others: Lycoming County officials, Centre County officials, Luzerne County officials, Federal Highway Administration officials, Federal Transit Administration officials, SEDA-COG staff, other state and federal resource agencies, and private citizens with an interest in transportation and economic development throughout the region.

MPO Transportation Planning Documents & Activities

The SEDA-COG MPO carries out the metropolitan planning process for the 8-county MPO region. In doing so, the MPO has adopted and regularly updates and amends a core set of plans and programs.

Document	Required Update Cycle	Next Update Planned for Adoption
Long-Range Transportation Plan (LRTP)	5 years	2026
Transportation Improvement Program (TIP)	2 years	2022
Public Participation Plan (PPP)	Triennially	2025
Unified Planning Work Program	Biennially	2023
Coordinated Public Transit-Human Services Transportation Plan	Periodically	2024

Much of the SEDA-COG MPO's public participation effort is associated with these plans, as they are the most influential and far-reaching in guiding transportation investments. Public participation is critical to the ongoing improvement and adaptation of these plans to the ever-changing needs, priorities, and circumstances of the MPO region.

In addition, the MPO may generate other plans and technical studies, including corridor improvement plans, bicycle and pedestrian plans, and land use/economic analysis.

Long-Range Transportation Plan (LRTP)

The SEDA-COG MPO is required to conduct a continuous, cooperative, and comprehensive transportation planning process. Developing an LRTP is an integral part of this process. The LRTP identifies transportation conditions, needs, goals, projects, and policies for a minimum 20-year horizon. It is updated at 5-year intervals for the SEDA-COG MPO region. The most recent [SEDA-COG MPO LRTP](#) was adopted in June 2021, and an LRTP update is planned for adoption by June 2026.

The SEDA-COG MPO LRTP establishes the vision and objectives that guide public decisions affecting transportation facilities and services in the region. It serves as the blueprint for transportation and economic investments that address network deficiencies, safety issues, mobility constraints, accessibility limitations, and unsustainable development. The SEDA-COG MPO staff coordinates development of the LRTP with residents of the region, a diverse steering committee, and other local, state, and federal agencies.

Consistent with the LRTP's performance monitoring, the MPO staff provides an annual report on the performance measures included in the Plan. These performance measures are designed to examine the condition of our transportation system and gauge the effectiveness of the strategies developed for implementation.

Transportation Improvement Program (TIP)

The TIP is the regionally agreed-upon list of priority projects, which consists of the first four years of PennDOT's Twelve Year Program. The TIP consists of modal and multi-modal projects, including traditional highway/bridge and transit projects, along with bicycle/pedestrian, aviation, and freight-related improvements.

The TIP is comprehensively updated every two years in Pennsylvania, but between updates, it is a "living document" that is revised regularly by the MPO. As guided by the regional SEDA-COG TIP Revisions Procedures, TIP Amendments address major changes, such as the addition or deletion of a project or a substantial change in project cost, schedule, or overall project scope. TIP Administrative Modifications address minor changes.

Public Participation Plan (PPP)

The PPP ensures that the SEDA-COG MPO's public involvement activities comply with applicable Federal and state metropolitan transportation planning regulations. The PPP was developed based on consultation with stakeholders and includes regional overview information and a

framework of goals, objectives, and strategies for accomplishing an effective and compliant public participation process in SEDA-COG's transportation planning efforts. The PPP includes procedures for implementing public involvement as well as indicators for evaluating the performance of the plan and suggesting future improvements.

Unified Planning Work Program (UPWP)

The UPWP describes the planning program and scope of activities for the MPO. It identifies the transportation planning activities that the SEDA-COG MPO intends to accomplish during a two-year period using federal, state and local resources. Included in the UPWP is a budget, which details how resources will be utilized. The UPWP is reviewed, updated, and re-adopted biennially.

Coordinated Public Transit-Human Services Transportation Plan

The Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan) examines the breadth of regional human services needs that trigger a need for public transit service. The plan is called out as a requirement for accessing certain Federal grant programs, particularly the Federal Transit Administration (FTA) Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities (49 U.S.C. 5310). The most recent Coordinated Plan was completed jointly with the Williamsport Metropolitan Planning Organization and was adopted in September 2019.

Other Planning Activities and Special Studies

Local Technical Assistance Program (LTAP) Municipal Outreach – SEDA-COG has partnered with PennDOT to provide the region's municipalities with free training through [LTAP](#). LTAP offers various training courses dealing with roadway maintenance and safety. Technical assistance is also available. The goals of the LTAP program are:

- Increase municipal expertise
- Improve safety for client and public
- Increase professional communication
- Disseminate information
- Promote the implementation of research
- Provide tailored training materials
- Meet municipal government needs

Special Studies – SEDA-COG routinely conducts special supplemental studies that evaluate transportation, land use, and economic development issues. Some prior studies have investigated special community-level traffic concerns, transportation elements of comprehensive plans, Smart Transportation corridor studies, bicycle/pedestrian safety studies, interchange studies, etc.

2. PUBLIC PARTICIPATION

The purpose of the Public Participation Plan is to provide the public with an understanding of regional transportation planning and programming, associated update processes, and the methods the SEDA-COG MPO uses for public engagement. The SEDA-COG MPO seeks to provide the public with convenient and timely information and to simplify participation in transportation planning processes. The SEDA-COG MPO will make all reasonable modifications to policies, programs, and documents to ensure that people with disabilities and those with limited English proficiency have an equal opportunity to participate in all its programs, services, and activities. Anyone who requires an auxiliary aid or service for effective communication, documents in alternative formats or languages, or a modification of policies or procedures to participate in a program, service, or activity of the SEDA-COG MPO, should contact SEDA-COG at (570) 524-4491 as soon as possible but no later than five (5) days before scheduled events.

Public participation encompasses all the activities that seek to reasonably inform and involve citizens, affected public agencies, operators of transportation services, and representative users of the transportation system in the transportation planning process. The ongoing development and maintenance of the transportation system is performed best when the users of the system participate in the planning process, bringing diversified viewpoints into the process that shapes how transportation investments will be made.

Plan Development with Interested Parties

Interested parties were engaged both in developing the underpinning goals of this Public Participation Plan and in editing/refining the draft Plan. The following interested parties were actively involved during development of the DRAFT Plan:

Management Team:

- Federal Highway Administration Pennsylvania Division Office
- Federal Transit Administration Region III Office of Planning & Program Development
- PennDOT Bureau of Equal Opportunity
- PennDOT District 2-0 Planning & Programming Unit
- PennDOT District 3-0 Planning & Programming Unit
- PennDOT Program Center
- SEDA-COG Transportation Planning Program

Via Focus Group Meetings:

- TBA
- TBA
- TBA
- TBA
- TBA
- TBA

Via MPO Outreach and Committee Meetings:

- All MPO Committee Members

Public Participation Goals

SEDA-COG MPO's Public Participation Plan is guided by six (6) goals that set the framework for outreach and involvement in the MPO's transportation decision-making processes.

1. **Extend the reach of the participation program.** The MPO desires to grow the number of participants in the transportation planning process. This would include strengthening communication networks among local, regional and state planning partners to increase public access and transparency of information and operations. Accordingly, the MPO intends to expand the use of existing electronic and new media communications (see examples defined in below Strategies section) alongside the known effective traditional approaches to make the participation process more inviting and convenient.
2. **Encourage diversity of participants.** The SEDA-COG MPO desires to increase engagement with minority, low-income, limited English proficient, disabled, senior citizen, and youth populations. The MPO recognizes the benefit of stimulating involvement by a broad range of persons with a variety of perspectives and interests in the transportation system.
3. **Increase the impact of participation.** As participation is extended, the MPO aims to better manage and apply that feedback to the decision-making process. This includes the internal conduits by which feedback is presented to decision-makers, as well as the response back to participants and all interested parties—so that there is better accountability and follow-up to ensure the effective influence of public participation.
4. **Increase participant satisfaction.** Participants in the planning process desire to come away feeling that they understood the material presented, were respected, and that their point of view made a difference, and their effort was worthwhile. The MPO aims to enhance its use of comment forms and various modes of surveying to gauge satisfaction with the participation process, including the content and quality of communication materials.
5. **Realize opportunities for education.** SEDA-COG desires to expand the baseline knowledge about transportation issues, how transportation investments are made, and the opportunities that citizens have to influence the planning process. The MPO will seek to raise awareness about the MPO's existence, function, and role in transportation decision-making through more attention to branding, linkages with agency partners, and an increasing presence in the communities served.

6. **Formalize the use of performance indicators.** The MPO will formalize a set of indicators for measuring and tracking the effectiveness of public involvement strategies to evaluate goals and support continuous improvement efforts.

Public Participation Objectives

The Objectives of the SEDA-COG MPO's Public Participation Plan incorporate all of the fundamental Federal guidance for public participation at the MPO level (23 C.F.R. § 450.316) as well as other MPO objectives. The Objectives have been fitted to each plan Goal, as follows:

1. **Extend the reach of the participation program.**

OBJECTIVE: Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the draft long-range transportation plan, TIP, and PPP.

OBJECTIVE: Coordinate with the statewide transportation planning public involvement and consultation processes for:

- Transit agencies that receive Federal funds
- Agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the USDOT to provide non-emergency transportation services
- Agencies that maintain/operate roadways or other transportation services on Federal/State Lands

OBJECTIVE: Make public information (technical information and meeting notices) available in electronically accessible formats and means, making full use of Internet capabilities and virtual public involvement opportunities.

OBJECTIVE: Hold public meetings at convenient and accessible locations and times. Continue or expand virtual public involvement techniques.

2. **Encourage diversity of participants.**

OBJECTIVE: Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.

3. Increase the impact of participation.

OBJECTIVE: Provide an additional opportunity for public comment, if the final LRTP or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.

OBJECTIVE: Demonstrate explicit consideration and response to public input received during the development of the LRTP and the TIP.

4. Increase participant satisfaction.

OBJECTIVE: Provide concise and well-organized plan materials within a transportation planning process that is well defined and easily understood.

OBJECTIVE: Employ visualization techniques to describe long-range transportation plans and TIPs.

5. Realize opportunities for education.

OBJECTIVE: Provide timely notice and reasonable access to information about transportation issues and processes.

6. Formalize the use of performance indicators.

OBJECTIVE: Periodically review the effectiveness of the procedures and strategies contained in the public participation plan to ensure a full and open participation process.

3. STRATEGIES FOR PUBLIC PARTICIPATION

Public participation is essential to effective transportation planning. Meaningful public participation helps produce better decisions and avoid unintended negative impacts from transportation projects. SEDA-COG MPO uses a wide range of strategies and public engagement techniques to provide for meaningful participation, including:

- Communication by mail, phone, fax, email, or person-to-person contact
- Public meetings, workshops, open houses, and hearings that are held at convenient and accessible locations and times
- Distribution of public notices and press releases
- Distribution of reports, fact sheets, maps, and other documents for planning efforts
- SEDA-COG’s website for documents, meeting schedules, agendas, minutes, news, etc.
- Paper copies of draft plans placed at county, municipal, and agency offices
- Distribution of an MPO e-newsletter
- Dissemination of public surveys and comment forms
- Posts and announcements through SEDA-COG’s social media accounts
- Partnering with community, civic, non-profit, and business groups to share information and host public input sessions
- Consulting with agencies and officials working with traditionally underserved populations or responsible for planning activities affected by transportation
- Publicizing that translation, interpretation, or other auxiliary services are available to the public
- Visualization aids to help the public understand transportation plans and/or programs
- Cross-promoting and working with data from state agency public surveys

More details on several of these techniques follow. Through this Public Participation Plan (PPP) and subsequent updates, SEDA-COG MPO will expand its existing community engagement activities through the incorporation of proposed new and traditional media strategies with existing ones. These strategies are designed to develop a more robust PPP that offers more access throughout the planning region.

Electronic, New Media Strategies

Regional planning organizations—particularly those like SEDA-COG, that are responsible for large geographic areas with dispersed, lower density populations—are looking to electronic and other non-traditional methods of communications to fulfill their plan goals. This update of the SEDA-COG MPO Public Participation Plan will promote and support the use of more electronic and “new media” resources (virtual meeting software, apps, social media, online surveying) to extend accessibility to broader community segments who are using smart phones and all types of mobile and desktop computers as their primary means of sending and receiving information. Through future updates, the Public Participation Plan will continue to evolve to reflect the evolving communication methods and trends of the communities served.

To fulfill the goals of this plan update, the following menu of electronic, new media and traditional strategies will be utilized:

SEDA-COG Website

The SEDA-COG Website (www.seda-cog.org) currently provides an online presence and multi-purpose platform for information dissemination and public feedback. The site is actively monitored and maintained by SEDA-COG staff, to keep the site current and implement new features.

Existing SEDA-COG Website Functionality:

- Identification and description of the MPO's role in metropolitan transportation planning and its Bylaws for operation.
- Clearinghouse for current and draft MPO planning documents, including Long-Range Transportation Plan, Transportation Improvement Program, Public Participation Plan, Coordinated Public Transit-Human Services Transportation Plan, Unified Planning Work Program, Strategic Plan, and Middle Susquehanna Regional Bicycle/Pedestrian Plan.
- Links to transportation resources, particularly those relevant to grant programs, statewide plans, and interactive visualization tools.
- Links to other transportation planning organizations, planning efforts, studies, and improvement projects throughout the region.
- Notification point for MPO Committee Meetings, other public meetings and public involvement activities associated with plan review and updates.
- Repository for MPO Committee Meeting agendas, packets, recordings, and minutes of past meetings.
- SEDA-COG Calendar of Events.
- Comment portal for online feedback.
- Document translation request form.

Providing this broad online functionality helps fulfill the MPO's mission to extend public access across SEDA-COG's large geographic area. The MPO will enhance the webpage resource by adding proposed interactive features, such as expanded functionality of SEDA-COG's Website.

Proposed SEDA-COG Website Functionality:

- Additional interactive features within the resources of the MPO and maintenance capabilities and expertise of the SEDA-COG IT staff (e.g., surveys, social media connections, and GIS-based mapping—within the available resources, maintenance capabilities and staff expertise of the MPO).
- Link the SEDA-COG website from planning partners' websites as part of an Agency Coordination Effort to establish an online planning informational network in the region. This will increase the number of access points through which the general public may locate planning update documents for review and comment.

- More Online availability of public meeting information to supplement public meetings conducted at physical locations. During the COVID-19 pandemic, SEDA-COG MPO initially transitioned to solely virtual MPO Committee meetings and then pivoted to hybrid meetings that accommodated either in-person or virtual participation. The meetings were recorded using software powered by Zoom and afterward uploaded to SEDA-COG’s YouTube channel and posted on the MPO’s website. This practice will continue and could be expanded to other meetings sponsored by the MPO. Further, brief videos about MPO Plans and Studies could be created and shared over social media or placed on the MPO website.

Google Analytics

Google Analytics is a service offered by Google that generates detailed statistics about a website's traffic and traffic sources. The basic service is free and provides a “dashboard” of general webpage usage data, with more in-depth data available through various reporting functions. The service requires minimal modification of the website coding. SEDA-COG has completed the necessary website modifications and is currently using the analytics data.

Google Translate

Google Translate is a translation service that provides instant translations between dozens of different languages. It can translate words, sentences, and entire webpages in supported languages. SEDA-COG has integrated Google Translate into its website, such that any HTML programmed webpage may be translated between English (base language) and any of the supported languages. (It is worth noting that Google Translate will not translate PDF files between languages.) In keeping with current best practices, SEDA-COG updated the Google Translate function to show a flag icon alongside 10 of the most common language names for easier identification.

Other Electronic Outreach Methods – Existing

The regular maintenance of well-organized contact databases support effective email blast efforts and online engagement platforms in which information is shared with large groups of recipients in an efficient and coordinated way. The SEDA-COG MPO primarily maintains and uses the following for electronic outreach:

- Interested Parties Database
The MPO maintains an Interested Parties Database of contact information pursuant to federal planning regulations and for those who wish to be notified directly of transportation planning activities, public meetings, and modifications to the MPO’s primary planning documents. The Database is open to all citizens, as well as agencies, government entities, and their representatives. An Interested Party may be added to the database by:
 - Contacting the MPO staff via phone or email with name and email address and requesting to be added to the Interested Parties Database.

- Completing the online Comments Form with name and email address and requesting to be added to the Interested Parties Database.
- Indicating on a Public Comment Form the request to be added to the Interested Parties Database.

The MPO maintains the Database regularly, updating it as staffing changes occur or in response to undeliverable emails sent as part of frequent draft Plan comment period notices. A summary of the Database (in Distribution List format with emails and other contact information removed) is included in **Appendix R.1**.

- Mailing Lists

The MPO also maintains other mailing and emailing lists for more specific purposes where the Interested Parties Database is too broad or otherwise not appropriate. For instance, an individual who is participating in a Long-Range Transportation Plan Update but does not wish to receive notifications about future TIP Updates or Amendments might wish to be added to the LRTP-specific mailing list only.

- Online Email Marketing Service

Online email marketing services offer a platform for designing, distributing, and tracking email correspondence. The MPO uses Constant Contact to disseminate specific email and electronic newsletter campaigns. The MPO initiated its quarterly e-newsletters in 2020 and has seen healthy open and click rates from the nearly 270 recipients on the e-newsletter contact list. The e-newsletters are also posted to the MPO's website and promoted on social media.

- SurveyMonkey

SurveyMonkey is an online survey tool that offers a variety of templates to facilitate easy survey creation. SEDA-COG MPO has successfully used SurveyMonkey to support many plan updates, committee polling, training needs queries, etc. It features easy question creation and custom branding to help identify a survey with a particular project or planning activity. With a single URL, responses can be gathered through email, links on websites, Facebook pages and Twitter feeds. Data collected can be sorted by cross tabs and filters and reported in several ways including tables, charts, and graphs. The online interface/display is compliant for accessibility by persons with visual disabilities.

- Social Media

SEDA-COG MPO staff collaborate with the SEDA-COG Communications Coordinator to issue public information on social media platforms, such as Facebook, Twitter, and LinkedIn. Announcements for transportation plan comment periods, public meetings, grant funding rounds, published final reports, PennDOT initiatives, etc. are shared over the social media platforms. Further, MPO meeting recordings are posted to SEDA-COG's YouTube channel.

- Online Mapping Tools

The MPO develops and maintains interactive online maps for various plan updates and public engagement efforts. SEDA-COG GIS staff spearhead these efforts, building and maintaining interactive web maps with [ArcGIS Online](#), Esri's web-based mapping software. SEDA-COG hosts a variety of maps that effectively share staff data and insights for exploration and analysis by interested parties and the public. In addition, as part of developing the 2021 Long-Range Transportation Plan, the MPO started using [ArcGIS Hub](#) to engage and collaborate with area stakeholders by sharing data, maps, and applications on user-friendly Hub websites.

Other Electronic Outreach Methods – Proposed

- Online Survey Tools – Although these tools are not explicitly required by Federal or state guidelines, they can be useful alternate methods to collect feedback.
- MetroQuest is an online survey tool utilized effectively for planning and transportation projects. The survey can be a separate webpage or integrated/embedded into an existing website. Using mapping and visuals, MetroQuest guides users through the process of learning about a planning project and providing valuable input. Below is a summary of the different types of screens and information that can be utilized:
 - **Surveys/Polls** – Surveys and other types of polling can be created to gather feedback and demographic information from the public.
 - **Ideas Submission** – Polls or topic discussions can provide a comment field for open-ended feedback. Mapping features allow users to place icons and identify specific projects or concerns. Specific roadways and travel routes may also be identified. The data may be saved and exported into GIS-compatible formats.
 - **Prioritization Activities** – The public can participate in prioritizing plan topics and/or funding strategies.
 - **Report Results** – Comments, ideas, and poll results can be exported.
 - **Analytics** – Demographic data can be gathered using polls or surveys.

www.metroquest.com

- MindMixer is a public participation tool founded by urban planners to address the challenge of effectively engaging the public. The site functions like a traditional website, but also offers the following features and capabilities:
 - **Ideas Submission** – The public can submit ideas, which can also be tied to locations on dynamic maps. Administrators and stakeholders can leave feedback and updates on ideas submitted by participants, helping keep

the conversation going and ensuring participants that their voices are being heard.

- **Prioritization Activities** – The public can participate in prioritizing plan topics or funding opportunities.
- **Surveys/Polls** – Surveys or polls can be created to gather information from the public.
- **Report Results** – Comments, ideas, and poll results can be exported into a variety of workable formats to measure public feedback.
- **Analytics** – Demographic data can be gathered by topic and reported to analyze who is commenting and from what area they reside.

www.mindmixer.com

- **Visualization Tools** – Visualizations provide information and context that narrative alone is unable to convey. SEDA-COG MPO will consider taking advantage of visualization techniques that provide the public with an increased understanding of what proposed transportation projects will look like and mean for their communities. These techniques could include photo simulations, 3-D images, videos, animations, aerial footage, etc.

The following visualization tools are already hosted by PennDOT, and links to these tools are included on the SEDA-COG webpage. The SEDA-COG MPO will use these tools in its ongoing planning activities and promote their use amongst planning partners.

- PennDOT's TIP Visualization Application provides the public with an informational portal for learning about and viewing improvements to state highways and bridges, as well as to aviation, public transit, and rail freight modes of transportation. The TIP Visualization portal is a web-based GIS mapping application for highway, bridge, aviation, and transit projects on the Commonwealth's Twelve Year Transportation Program and Regional TIPs. Users can map and obtain information for highway and bridge projects on various geographical levels, including PennDOT Engineering District, County, Legislative District, Planning Partner, and Address.

<https://gis.penndot.gov/paprojects/TipVisMap.aspx>

- PennDOT's One Map application is a system designed to support the provision of improvements to state highways and bridges, as well as to aviation, public transit, and rail freight modes of transportation. Like the TIP Visualization portal, One Map is a web-based GIS mapping application that allows users to search for projects using criteria such as Location, Planning partner, Legislative District, PennDOT Engineering District, and Highway Occupancy Permits (HOPs). Projects can also be mapped individually by MPMS Project ID number or by Bridge Key.

One Map provides a wealth of layers beyond what exists in the TIP Visualization portal and allows users to import their own data and print/share maps.

<https://gis.penndot.gov/OneMap/>

- PennDOT's Pennsylvania Transportation and Heritage (PATH) application is an online database and communication tool to facilitate consultation between PennDOT and the public on cultural resources that may be affected by its projects. PATH provides users with a searchable database of Section 106 of the National Historic Preservation Act and Pennsylvania State History Code undertakings on all transportation projects programmed on the Statewide Transportation Improvement Program. Users can search for a project by location, name, or PennDOT MPMS number. PATH also offers an email alert system to inform users about transportation projects in their community, and/or based upon interest categories, that may have the potential to affect historic resources.

<https://path.penndot.gov/>

Traditional Outreach Strategies – Existing

MPO Meetings and Other Public Meetings

These provide an opportunity for the public to provide comments on MPO business and planning projects. The details of public meetings should be well-planned in advance (see example Public Meeting Plan in **Appendix R.2**) to assist in the identification, development and creation of all materials, including advertisements, allocation of public meeting location space (see example Public Meeting Site Review Checklist), and informational handouts and displays. Public meeting comment forms will be available in hardcopy at public meeting locations, to receive public comment, and online during the associated public comment period. Actionable public comments will be identified, and responses will be given to demonstrate the influence of public participation and feedback upon planning processes. Non-actionable comments will be recognized, and the commenters thanked for their input.

Regularly scheduled MPO Committee meetings accommodate in-person or virtual participation. As an added convenience for the public or other stakeholders, a virtual meeting option may be used to supplement in-person meeting formats for other meetings conducted by the MPO. In the event that an in-person public meeting is not feasible or advisable (e.g., public health or other emergency), the SEDA-COG MPO may offer a solely virtual meeting option instead. Detailed information on the virtual meeting option (date, time, dial-in number, conference code, and link for the virtual meeting software) will be provided to the public.

Placement of Paper Copy Plan Documents for Review

Paper copies of draft plans are placed in the following county, municipal, and agency offices throughout the SEDA-COG MPO region during comment periods:

- SEDA-COG Office - 201 Furnace Road, Lewisburg, PA 17837
- Clinton County Offices - 2 Piper Way, Suite 244, Lock Haven, PA 17745
- Columbia County Offices - 26 West First Street, Bloomsburg, PA 17815
- Juniata County Offices - Bridge and Main Streets, Mifflintown, PA 17059
- Mifflin County Offices - 20 North Wayne Street, Lewistown, PA 17044
- Montour County Offices - 435 East Front Street, Danville, PA 17821
- Northumberland County Offices - 399 Stadium Drive, Sunbury, PA 17801
- Snyder County Offices - 9 West Market Street, Middleburg, PA 17842
- Union County Offices - 155 North 15th Street, Lewisburg, PA 17837
- Call A Ride Service, Inc. - 249 West 3rd Street, Lewistown, PA 17044
- Lower Anthracite Transit System - 137 West 4th Street, Mt Carmel, PA 17851
- rabbittransit - 61 Tyler Avenue, Elysburg, PA 17824
- rabbittransit - 713 Bridge Street, Suite 11, Selinsgrove, PA 17870
- STEP, Inc. - 2138 Lincoln Street, Williamsport, PA 17701
- Town of Bloomsburg Office - 301 East 2nd Street, Bloomsburg, PA 17815
- Borough of Berwick Office - 1800 North Market Street, Berwick, PA 18603
- PennDOT District 2-0 Office - 70 PennDOT Drive, Clearfield, PA 16830
- PennDOT District 3-0 Office - 715 Jordan Avenue, Montoursville, PA 17754

Mailings

Informational materials and announcements are distributed to committee members, interested parties, and the general public. Materials are primarily shared to the mailing lists via email.

Support Other Planning Efforts

The SEDA-COG MPO will coordinate with the statewide transportation planning, public involvement and consultation processes for transit agencies that receive Federal funds; agencies and non-profit organizations that receive Federal assistance (other than USDOT) to provide non-emergency transportation services; and agencies that maintain and operate roadways and other transportation services on Federal/State lands. This will be achieved through MPO Committee Surveys, the Interested Parties Database, MPO coordination activity, and the Coordinated Public Transit-Human Services Transportation Plan.

Print Media

MPO and Public Meetings are advertised in *The Daily Item* (at minimum) and other newspapers in the respective counties of the SEDA-COG MPO region. This includes placement of legal notices, advertisements, and press releases for public comment periods.

Public Plans Displays

Major planning documents are displayed at county government buildings, local libraries, and in the offices of planning partners in the SEDA-COG region during public comment periods.

Demographic Profiles

The MPO maintains profiles of the region's demographic composition (including mapping that illustrates the profiles) for planning purposes. Wherever possible, identical datasets are used in different plans and documents, so that data consistency exists across the MPO's various planning efforts. Profiles of particular interest include minority, low-income, elderly, disabled, and limited-English proficiency (LEP) populations.

Broadcast Media

Broadcast media outlets have become a fusion of traditional and new media, often delivering messages in two or more formats, with one being an online posting.

- *Press Releases* are a required component of the outreach process and should be issued 10 calendar days prior to a Public Meeting or upon the start of a Public Comment Period and should be sent to local newspapers, radio, and TV broadcast media outlets.

4. INDICATORS FOR PUBLIC PARTICIPATION

This Public Participation Plan adopts a series of indicators that serve as “performance measures” for the effectiveness of public participation strategies and the return on investment of time, talent, and financial resources devoted to outreach efforts. Evaluations of the indicators will be conducted annually and incorporated with other MPO performance measures. The annual indicator evaluations will be referenced in the triennial reviews of the Public Participation Plan.

The listing of indicators provided here is the minimum set of indicators that the SEDA-COG MPO commits to using in monitoring the performance of the PPP. Other indicators and measures may be developed to supplement this list or serve the unique needs of a specific planning effort, but these additional indicators will not be considered “required” until they are formally adopted in future updates of the PPP.

To assist in implementation of the PPP, the indicators listed here are paired with one or more “strategies” that are described in the previous chapter. In most cases, these pairings are set up such that the strategies are the primary source of the data for evaluating the indicators.

The following conventions are implied in the indicator specification:

- Indicators are frequently organized under a topic heading, particularly where two or more indicators are specified for a particular aspect of public participation.
- Certain indicators that gauge satisfaction, usefulness, awareness, or understanding are intended to be measured on a continuum, for example:
 - Satisfaction: Very satisfied, Somewhat satisfied, Indifferent, Somewhat unsatisfied, Mostly unsatisfied.
 - Usefulness: Very useful, Somewhat useful, Indifferent, Somewhat useless, Mostly useless.

The performance measure for these indicators could then be formatted in terms of the percentage of participants who were, for example, “Very satisfied.” As an alternate, the percentage might be calculated for the total participants who were either “Very satisfied” or “Somewhat satisfied.”

- Indicators that generate “lists” (e.g., source of notice about a public meeting) have a typical set of responses that may be evaluated across the planning program.

Indicator Specification

Strategies	Indicators
<p>Public Comment Forms (paper forms distributed at public meetings)</p> <p>Online Public Surveys (SurveyMonkey, electronic comment forms)</p>	<p>Advertisement methods:</p> <ul style="list-style-type: none"> • Source of notice about the plan revisions, planning activity, or public meeting • Satisfaction with adequacy of notice about plan revisions <p>Meeting locations & accommodations:</p> <ul style="list-style-type: none"> • Satisfaction with meeting accessibility/accommodations • Average distance traveled from home to meeting site for meeting participants <p>Participant diversity:</p> <ul style="list-style-type: none"> • Demographic composition of meeting and survey participants (race, ethnicity, income, language, age, disability) <p>Quality and organization of materials and visuals:</p> <ul style="list-style-type: none"> • Understanding of materials presented • Satisfaction with the graphics and visuals <p>Comprehension and confidence in the public participation process:</p> <ul style="list-style-type: none"> • Understanding of process being followed • Satisfaction that the process is being followed correctly <p>Adequacy of public comment period:</p> <ul style="list-style-type: none"> • Satisfaction with the opportunities for public review and comment.
<p>Interested Parties Database</p>	<p>Generation/maintenance of planning interest:</p> <ul style="list-style-type: none"> • Total number of Interested Parties in distribution lists • Year-over-year increase in the number of Interested Parties in the distribution lists
<p>Project/Plan-Specific Web Portals</p> <ul style="list-style-type: none"> • Evaluation of portal analytics 	<p>Effectiveness of Web Portal:</p> <ul style="list-style-type: none"> • Total site hits • List of top feeder sites/URLs • Number of registered users • Average time users spent on the portal • Total hits on the most accessed pages/materials

Strategies	Indicators
MPO Committee Surveys (SurveyMonkey)	MPO Committee diversity: <ul style="list-style-type: none"> Demographic composition of MPO Committee (race, ethnicity, gender, income, language, age, disability) MPO Committee use of public comment: <ul style="list-style-type: none"> Usefulness of participant feedback in their decision-making effort
SEDA-COG Website Analytics (Google Analytics)	Effectiveness of the MPO website: <ul style="list-style-type: none"> Total hits on the MPO page Total hits on the Transportation sub-pages (MPO, LRTP, TIP, PPP, TA, LTAP, Transit, Bike/Ped) Total hits on web advertisements of plan updates/amendments/etc. Total hits on advertised plan updates during the public comment periods for plan updates/amendments/etc. Participant diversity: <ul style="list-style-type: none"> Total requests for Google Translate by language requested Total website hits on translated versions of posted documents
Event Site Checklist	Accessibility of Public Meetings: <ul style="list-style-type: none"> Percentage of public meetings held in an ADA accessible location
Comment Tracking	Extent of comment received: <ul style="list-style-type: none"> Total number of comments received during the primary comment period Total number of comments received during the additional comment period
Maintain Coordinated Public Transit-Human Services Transportation Plan and other public transportation support functions	Extent of MPO resources expended: <ul style="list-style-type: none"> Dollar value of MPO resources supplied Dollar value of staff time
Visualization Tools	Use of Visualization Tools: <ul style="list-style-type: none"> Number of hits on website links to visualization tools (TIP Visualization, One Map, PATH, SEDA-COG ArcGIS Online and ArcGIS Hub web maps)

Strategies	Indicators
Targeted “Follow-Up” Surveys <ul style="list-style-type: none"> • Surveys of participants who provided comments, using the contact information provided by respondents/participants. 	Effectiveness of follow-up on participant feedback: <ul style="list-style-type: none"> • Awareness of how their comments were addressed • Satisfaction that their comments were addressed
Agency Coordination Effort <ul style="list-style-type: none"> • Surveys of municipalities and agencies • Inventory of municipal and agency websites 	Recognition of coordinated planning: <ul style="list-style-type: none"> • Number of municipal, community, and regional transportation agency sites posting the SEDA-COG logo and/or link to the SEDA-COG website

Evaluation Processes for the Public Participation Plan

The MPO will maintain the following processes for documenting and evaluating the effectiveness of the public involvement activities stipulated in the PPP:

- Maintenance of a Public Involvement Activity Portfolio
- Annual Evaluation of the Performance Measures
- Triennial Evaluation of the Plan

Public Involvement Activity Portfolio

The MPO retains concise documentation of its public involvement and participation activities that are stipulated in this PPP within a “portfolio” as a record of the Plan’s implementation. The actual items collected for the portfolio reflect the PPP requirements of the planning activity completed, and will generally include:

- Public notices and announcements of comment periods and involvement activities
- Summaries of the proceedings of the public outreach activity
- Listings of participants
- Record of materials displayed, distributed, and/or made available
- Compilations and analysis of surveys and comments received
- Interested Parties distribution lists and correspondence sent/received
- Record of media coverage of the event

Annual Evaluation of Performance Measures

In parallel with the reporting and evaluation of performance measures for other MPO functions—particularly the long-range transportation plan—the MPO will also compile the indicators outlined in this plan on an annual basis.

Triennial Evaluation of the Plan

The Public Participation Plan serves as a component of the MPO's overarching Title VI Program document. As such, the PPP will be updated or reviewed for update every three years, as part of the Title VI Program maintenance schedule. The MPO will evaluate its PPP and review the Public Involvement Activity Portfolio and Performance Measures triennially, using the checklists provided in **Appendix R.5**:

- Plan/Planning Activity Review – Each plan or plan activity is reviewed using the one-page checklist and materials found in the Activity Portfolio. The checklist could be completed as an “after-action” exercise immediately after the plan or activity is completed.
- Need for Public Participation Plan Update – This checklist identifies the most common circumstances that would trigger the need for a public participation plan update. Based on the review, the “degree” of the update would be determined. The solicitation of public comment and/or the need for new adoption votes will only result from significant PPP updates or requirements in new federal/state policy and legislation.
- Open Ended Review – This form offers only two starter questions, and it is directed toward “big picture thinking” about the PPP's effectiveness and improvement. The review is intended to be a repository of ideas and future aspirations for SEDA-COG's PPP.

The MPO staff will facilitate and document the review, and the findings will be used to improve the quality of public involvement activities. The documentation of the review may include listings of the planning activities completed, accomplishments and milestones that the MPO has achieved, etc.

Future Public Participation Plan Efforts

The SEDA-COG MPO recognizes the need to continuously enhance its outreach efforts. An array of potential outreach strategies is included in **Appendix R.3**, but the following are primary activities that will take place to fulfill this goal:

- Further identify and consult with interested parties
- Continue to seek out EJ/LEP organizations, resources, and points of contact
- Conduct reviews of ADA accessibility features for meeting spaces
- Coordinate with disability advocates and IT experts to make electronic materials and SEDA-COG website content easier to access
- Investigate the formation of a Public Participation Panel (to include representatives of traditionally underserved populations) for assisting the MPO in implementing public outreach strategies and empowering citizens to get involved in regional planning

5. PUBLIC PARTICIPATION PLAN MATRIX

The Public Participation Plan Matrix on the following pages consolidates the goals, objectives, strategies and indicators (performance measures) that are described earlier in this PPP. The Matrix is a ready reference table designed to provide a concise overview of the PPP goals and objectives, combined with a summary listing of the related public involvement strategies that support each set of goals and objectives.

Overall goals for public participation are listed in the first column to the left of the matrix. The goals identify the primary points of emphasis for the reach, diversity, impact, satisfaction, education and performance of SEDA-COG's public participation efforts.

Objectives listed in the second column involve general actions that address each goal, and individual strategies identified in the third column list the strategies or action items specific to each corresponding objective. Implementing the public participation strategies will affect the desired change as identified in the goals and objectives.

Indicators contained in the far-right column identify performance measures that will be utilized to gauge the effectiveness of each public participation strategy. Monitoring the performance indicators will enable SEDA-COG MPO to identify the effectiveness of each strategy and thus the overall efficacy of its Public Participation Plan. Based on performance results, SEDA-COG MPO will refine its goals, objectives, strategies, and indicators in future triennial evaluations intended to continuously improve the PPP.

SEDA-COG MPO Public Participation Plan
Plan Matrix of Goals, Objectives, Strategies and Indicators

Goals	Objectives	Strategies	Indicators	
<p>1. Extend the reach of the participation program. The MPO desires to grow the number of participants in the transportation planning process. This would include strengthening communication networks among local, regional and state planning partners to increase public access and transparency of information and operations. To this end, the MPO intends to expand the use of existing electronic and new media communications alongside the known effective traditional approaches to make the participation process more inviting and convenient.</p>	Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed long-range transportation plan, TIP, and PPP.	Public Comment Forms (paper forms distributed at public meetings)	Advertisement methods: <ul style="list-style-type: none"> • Source of notice about the plan revisions, planning activity, or public meeting • Satisfaction with adequacy of notice about plan revisions Adequacy of public comment period: <ul style="list-style-type: none"> • Satisfaction with the opportunities for public review and comment 	
		Online Public Surveys (SurveyMonkey, electronic comment forms)	Generation/maintenance of planning interest: <ul style="list-style-type: none"> • Total number of Interested Parties in distribution lists. 	
		Interested Parties Database	Effectiveness of Web Portal: <ul style="list-style-type: none"> • Total site hits • List of top feeder sites/URLs • Number of registered users • Average time users spent on the portal • Total hits on the most accessed pages/materials 	
	Coordinate with the statewide transportation planning public involvement and consultation processes for: <ul style="list-style-type: none"> • Transit agencies that receive Federal funds. • Agencies and non-profit organizations that receive Federal assistance from a source other than the USDOT to provide non-emergency transportation services. • Agencies that maintain/operate roadways or other transportation services on Federal/State Lands. 	MPO Committee Survey	MPO Committee Survey	MPO Committee diversity: <ul style="list-style-type: none"> • Demographic composition of MPO Committee (race, ethnicity, gender, income, language, age, disability)
			Interested Parties Database	Generation/maintenance of planning interest: <ul style="list-style-type: none"> • Total number of Interested Parties in distribution lists • Year-over-year increase in the number of Interested Parties in the distribution lists
			Maintain Coordinated Public Transit-Human Services Transportation Plan and other transit and public transportation support functions	Extent of MPO resources expended: <ul style="list-style-type: none"> • Dollar value of MPO resources supplied • Dollar value of staff time
	Make public information (technical information and meeting notices) available in electronically accessible formats and means, making full use of Internet capabilities and virtual public involvement opportunities.	SEDA-COG Website Analytics (Google Analytics)	SEDA-COG Website Analytics (Google Analytics)	Effectiveness of the MPO website: <ul style="list-style-type: none"> • Total hits on the MPO page • Total hits on the Transportation sub-pages (MPO, LRTP, TIP, PPP, TA, LTAP, Transit, Bike/Ped) • Total hits on web advertisements of plan updates/amendments/etc. • Total hits on advertised plan updates during the public comment periods for plan updates/amendments/etc.
			Hold public meetings at convenient and accessible locations and times. Continue or expand virtual public involvement techniques.	Event Site Checklist
			Public Comment Forms (paper forms distributed at public meetings)	Meeting locations & accommodations: <ul style="list-style-type: none"> • Satisfaction with meeting accessibility/accommodations • Average distance traveled from home to meeting site for meeting participants
			Online Public Surveys (SurveyMonkey, electronic comment forms)	

SEDA-COG MPO Public Participation Plan

Plan Matrix of Goals, Objectives, Strategies and Indicators (continued)

Goals	Objectives	Strategies	Indicators
<p>2. Encourage diversity of participants. The SEDA-COG MPO desires to increase engagement with minority, low-income, limited English proficient, disabled, senior citizen, and youth populations. The MPO recognizes the benefit of stimulating involvement by a broad range of persons with a variety of perspectives and interests in the transportation system.</p>	<p>Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.</p>	<p>Public Comment Forms (paper forms distributed at public meetings)</p>	<p>Participant diversity:</p> <ul style="list-style-type: none"> Demographic composition of meeting and survey participants (race, ethnicity, income, language, age, disability)
		<p>Online Public Surveys (SurveyMonkey, electronic comment forms)</p>	<p>Participant diversity:</p> <ul style="list-style-type: none"> Total requests for Google Translate by language requested Total website hits on translated versions of posted documents
		<p>SEDA-COG Website Analytics (Google Analytics)</p>	<p>MPO Committee diversity:</p> <ul style="list-style-type: none"> Demographic composition of MPO Committee (race, ethnicity, gender, income, language, age, disability)
<p>3. Increase the impact of participation. As participation is extended, the MPO will aim to better manage and apply that feedback to the decision-making process. This includes the internal conduits by which feedback is presented to decision-makers, as well as the response back to participants and all interested parties—so that there is better accountability and follow-up.</p>	<p>Demonstrate explicit consideration and response to public input received during the development of the long-range transportation plan and the TIP.</p>	<p>MPO Committee Surveys (SurveyMonkey)</p>	<p>MPO Committee use of public comment:</p> <ul style="list-style-type: none"> Usefulness of participant feedback in their decision-making effort
		<p>Targeted “Follow-Up” Surveys</p> <ul style="list-style-type: none"> Surveys of participants who provided comments, using the contact information provided by respondents/participants. 	<p>Effectiveness of follow-up on participant feedback:</p> <ul style="list-style-type: none"> Awareness of how their comments were addressed Satisfaction that their comments were addressed
	<p>Provide an additional opportunity for public comment, if the final long-range transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.</p>	<p>Comment Tracking</p>	<p>Extent of comment received:</p> <ul style="list-style-type: none"> Total number of comments received during the primary comment period Total number of comments received during the additional comment period
<p>4. Increase participant satisfaction. Participants in the planning process desire to come away feeling that they understood the material presented, were respected, their point of view makes a difference, and their effort was worthwhile. The MPO aims to enhance its use of comment forms and various modes of surveying to gauge and improve satisfaction with the participation process, including the content and quality of communication materials.</p>	<p>Provide concise and well-organized plan materials within a transportation planning process that is well defined and easily understood.</p>	<p>Public Comment Forms (paper forms distributed at public meetings)</p>	<p>Comprehension and confidence in the public participation process:</p> <ul style="list-style-type: none"> Understanding of process being followed Satisfaction that the process is being followed correctly
		<p>Online Public Surveys (SurveyMonkey, electronic comment forms)</p>	<p>Quality and organization of materials and visuals:</p> <ul style="list-style-type: none"> Understanding of materials presented Satisfaction with the graphics and visuals
	<p>Employ visualization techniques to describe long-range transportation plans and TIPs.</p>	<p>Public Comment Forms (paper forms distributed at public meetings)</p>	<p>Online Public Surveys (SurveyMonkey, electronic comment forms)</p>
		<p>Visualization Tools</p>	

SEDA-COG MPO Public Participation Plan

Plan Matrix of Goals, Objectives, Strategies and Indicators (continued)

Goals	Objectives	Strategies	Indicators
<p>5. Realize opportunities for education. SEDA-COG desires to expand the baseline knowledge about transportation issues, how transportation investments are made, and the opportunities that citizens have to influence the planning process. The MPO will seek to raise awareness about the MPO's existence, function, and role in transportation decision-making through more attention to branding, linkages with agency partners, and an increasing presence in the communities served.</p>	<p>Provide timely notice and reasonable access to information about transportation issues and processes.</p>	<p>Interested Parties Database</p>	<p>Generation/maintenance of planning interest:</p> <ul style="list-style-type: none"> • Year-over-year increase in the number of Interested Parties in the distribution lists
		<p>Public Comment Forms (paper forms distributed at public meetings)</p> <p>Online Public Surveys (SurveyMonkey, electronic comment forms)</p>	<p>Adequacy of public comment period:</p> <ul style="list-style-type: none"> • Satisfaction with the opportunities for public review and comment
		<p>Agency Coordination Effort</p> <ul style="list-style-type: none"> • Surveys of municipalities and agencies • Inventory of municipal and agency websites 	<p>Recognition of coordinated planning:</p> <ul style="list-style-type: none"> • Number of municipal, community, and regional transportation agency sites posting the SEDA-COG logo and/or link to the SEDA-COG website
<p>6. Formalize the use of performance indicators. The MPO will formalize a set of indicators for measuring and tracking the effectiveness of public involvement strategies to evaluate goals and support continuous improvement efforts.</p>	<p>Periodically review the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.</p>	<p>MPO PPP Review</p>	<p>Conduct triennial review of the PPP</p>
		<p>Regional Performance Measures Report</p>	<p>Conduct yearly MPO staff-level evaluation of the indicators of PPP effectiveness, and incorporate the indicators into the annual Indicators Report</p>

6. PUBLIC PARTICIPATION PROCESS CHECKLISTS

This section contains a series of “checklists” designed to offer-step-by-step public participation guidance to support specific SEDA-COG planning activities. These planning activities include the development of: Long-Range Transportation Plans (LRTP) and Updates; LRTP Amendments; Transportation Improvement Program (TIP) Updates, Amendments, and Administrative Modifications; and Public Participation Plan (PPP) Updates.

The following “Process Checklists” lay out the key steps of SEDA-COG’s public participation process for primary plans, plan updates, amendments, and modifications. Each Process Checklist is built with steps that are generally chronological, although certain elements of each step may happen earlier or later in the process. Statutory and regulatory requirements—such as timeframes for public comment and involvement of FHWA—are provided at their minimum or better values, and their source (*Federal* or *State*) are indicated, where applicable.

Process Checklists are provided for the following:

- Long Range Transportation Plan (LRTP) & Updates
- Long Range Transportation Plan (LRTP) Amendment
- Transportation Improvement Program (TIP) Update
- Transportation Improvement Program (TIP) Amendments
- Transportation Improvement Program (TIP) Administrative Modifications

Each Process Checklist is provided on its own page or pages.

Long-Range Transportation Plan (LRTP) & Updates

Applies to the adoption of a new LRTP or a regular 5-year update

- ① Conduct a review of the MPO's current Public Participation Plan and appropriate the plan for the LRTP effort or implement an update, as required to comply with new transportation legislation, regulations, executive orders, and guidance (see Public Participation Plan Update).
- ② Implement a public involvement program that is consistent with the MPO's adopted PPP to support the LRTP development.
 - Ensure that FHWA and FTA are provided with an opportunity to participate in the LRTP development process. (*Federal*)
- ③ Release DRAFT LRTP document for public and agency comment.
 - Provide a reasonable opportunity for comment on the plan, including a public comment period of 30 calendar days, unless the MPO Committee elects a shorter period.
 - Provide DRAFT LRTP document to FHWA and FTA for review prior to the beginning of the public comment period.
 - Make document available in an accessible electronic format on the SEDA-COG website.
 - Make document available in a hard copy format at the SEDA-COG Office, county government offices, public transit agency offices, and PennDOT District 2-0 & 3-0 Offices.

Encouraged (but not required) activities to support LRTP public participation:

 - Upon the discretion of the MPO, the MPO staff may meet with local stakeholders and county staff and commissioners at their regularly scheduled and advertised meetings.
- ④ Notify public and agencies of opportunities to comment.
 - Publish notifications at least 30 calendar days prior to the comment period ending date and at least 10 calendar days prior to the public meeting date:
 - Legal Notice to appear in *The Daily Item* newspaper, at a minimum.
 - Press Release distributed to other newspapers and broadcast media outlets.
 - Interested Parties notified via email using distribution list.
 - Web notification on the SEDA-COG webpage in an accessible electronic format.
 - Tribal outreach.
 - Conduct at least one (1) public meeting at an accessible location.
- ⑤ Document the public participation effort and record in the Activity Portfolio.
 - Document the participation activities conducted (Meeting Venue Checklist, Public Participation Meeting tracking form).
 - Compile comments received and generate responses to actionable comments that indicate how the comment was incorporated or why a different approach was taken.
 - Incorporate comments and Comment Responses into the FINAL LRTP document.
 - Provide notification (by email) of the Comment Responses to all those who commented and provided email contact information.

Long-Range Transportation Plan (LRTP) & Updates (continued)

- ⑥ If the final version of the LRTP differs significantly from the version that was made available for public comment, provide an additional 7 calendar day public comment period.
 - Provide notification (by email) of the additional public comment period to the Interested Parties and all those who commented previously and provided email contact information prior to the beginning of the public comment period start date.
 - Provide revised document to FHWA and FTA for review prior to the beginning of the additional public comment period.
 - Make document available in an accessible electronic format on the SEDA-COG website.
- ⑦ Conduct Pennsylvania-required inter-agency consultation through presentation at an Agency Coordination Meeting (ACM). *(State)*
 - Request presentation time at a regularly scheduled ACM meeting.
- ⑧ Adopt the LRTP.
 - MPO adopts the final version of the LRTP by vote of the MPO committee at a regularly scheduled public meeting.
 - Make the final version of the LRTP available on the SEDA-COG website in an accessible electronic format.
 - Post notice of the LRTP adoption to the SEDA-COG webpage.
 - Provide adopted version of the LRTP in electronic format to both state and federal partners (PennDOT, FHWA, FTA).

Long-Range Transportation Plan (LRTP) Amendment

Applies to modifications of the MPO LRTP that occur between LRTP Update cycles. Where the update is triggered by a TIP Amendment, the public participation activities may be conducted jointly. The public participation effort should follow the more stringent requirements (TIP amendment or LRTP amendment).

- 1 Release the DRAFT LRTP Amendment(s).
 - Provide a reasonable opportunity for comment on the plan, including a public comment period of 30 calendar days.
 - Provide DRAFT LRTP document to FHWA and FTA for review prior to the beginning of the public comment period.
 - Make document available in an accessible electronic format on the SEDA-COG website.
 - Make document available in a hard copy format at the SEDA-COG Office, county government offices, public transit agency offices, and PennDOT District 2-0 & 3-0 Offices.

Encouraged (but not required) activities to support LRTP public participation:

- Upon the discretion of the MPO, the MPO staff may meet with local stakeholders and county staff and commissioners at their regularly scheduled and advertised meetings.

- 2 Determine the need to provide targeted outreach for project amendments that disproportionately burden populations or concentrations of Minority, In-Poverty, LEP or Disabled Persons.

TRIGGER: Burdensome action or project in an area defined by one or both of the following:

 - a. In a project area where the likely affected Minority, In-Poverty, LEP or Disabled persons exceeds 1,000 persons or,
 - b. In a Census tract where the concentration of Minority, In-Poverty, LEP, or Disabled persons exceeds two times the regional average for that population.
 - ** If a West Germanic LEP population is the trigger, the outreach may be waived if representatives of the West Germanic-speaking community indicate that the outreach activity is not desired.*
 - ** Targeted outreach will not be required in the event that the trigger results from an institutionalized population (e.g., within a prison, penitentiary, etc.).*
 - High LEP Outreach Activities:
 - Conduct a targeted outreach activity within the project area to engage the affected population.
 - Advertise the activity in the LEP language and through agencies, community organizations, or advocacy groups that serve the affected population.
 - Make amendment(s) available in an accessible electronic format on the SEDA-COG website in the affected LEP language (if possible).
 - High Minority, In-Poverty, or Disabled Outreach Activities:
 - Conduct a targeted outreach activity within the project area to engage the affected population.
 - Advertise the activity through agencies, community organizations, or advocacy groups that serve the affected population.
 - Make amendment(s) available in print copy format at the nearest municipal office to the project area.

Long-Range Transportation Plan (LRTP) Amendment (continued)

- 3 Notify public and agencies of opportunities to comment.
 - Publish notifications at least 30 calendar days prior to the comment period ending date and at least 10 calendar days prior to the public meeting date:
 - Legal Notice to appear in *The Daily Item* newspaper, at a minimum.
 - Press Release distributed to other newspapers and broadcast media outlets.
 - Interested Parties notified via email using distribution list.
 - Web notification on the SEDA-COG webpage in an accessible electronic format.
 - Tribal outreach.
 - Conduct at least one (1) public meeting at an accessible location.
- 4 Document the public participation effort and record in the Activity Portfolio.
 - Document the participation activities conducted (Meeting Venue Checklist, Public Participation Meeting tracking form).
 - Compile comments received and generate responses to actionable comments that indicate how the comment was incorporated or why a different approach was taken.
- 5 If the final version of the LRTP Amendment differs significantly from the version that was made available for public comment, provide an additional 7 calendar day public comment period.
 - Provide notification (by email) of the additional public comment period to the Interested Parties and all those who commented previously and provided email contact information prior to the beginning of the public comment period start date.
 - Provide revised document to FHWA and FTA for review prior to the beginning of the additional public comment period.
 - Make document available in an accessible electronic format on the SEDA-COG website.
- 6 Adopt the LRTP Amendment(s).
 - MPO adopts the final version of the LRTP Amendment(s) by vote of the MPO committee at a regularly scheduled public meeting.
 - Make the final version of the LRTP Amendment(s) available on the SEDA-COG website in an accessible electronic format.
 - Post notice of the LRTP Amendment(s) to the SEDA-COG webpage.
 - Provide electronic version of adopted LRTP Amendment(s) to both state and federal partners (PennDOT, FHWA, FTA).

Transportation Improvement Program (TIP) Update

Applies to the regular update of the TIP/STIP and Twelve-Year Plan (TYP) according to the statewide program.

- ① Release the DRAFT TIP.
 - Provide the public with a reasonable opportunity to comment on the DRAFT TIP package, including a public comment period of 30 calendar days (minimum). (*State*)
 - Provide the DRAFT TIP Update to FHWA and FTA for review prior to the beginning of the public comment period.
 - Make DRAFT TIP available in an accessible electronic format on the SEDA-COG website.
 - Make DRAFT TIP available in a hard copy format at the SEDA-COG Office, county government offices, public transit agency offices, and PennDOT District 2-0 & 3-0 Offices.

Encouraged (but not required) activities to support TIP public participation:

- Upon the discretion of the MPO, the MPO staff may meet with local stakeholders and county staff and commissioners at their regularly scheduled and advertised meetings.

- ② Notify public and agencies of opportunities to comment.
 - Publish notifications at least 30 calendar days prior to the comment period ending date and at least 10 calendar days prior to the public meeting date:
 - Legal Notice to appear in *The Daily Item* newspaper, at a minimum.
 - Press Release distributed to other newspapers and broadcast media outlets.
 - Interested Parties notified via email using distribution list.
 - Web notification on the SEDA-COG webpage in an accessible electronic format.
 - Tribal outreach.
 - Conduct at least one (1) public meeting at an accessible location.

- ③ Document the public participation effort and record in the Activity Portfolio.
 - Document the participation activities conducted (Meeting Venue Checklist, Public Participation Meeting tracking form).
 - Compile comments received and generate responses to actionable comments that indicate how the comment was incorporated or why a different approach was taken.
 - Provide notification (by email) of the Comment Responses to all those who commented and provided email contact information.

- ④ If the final version of the TIP Update differs significantly from the version that was made available for public comment, provide an additional 7 calendar day public comment period.
 - Provide notification (by email) of the additional public comment period to the Interested Parties and all those who commented previously and provided email contact information prior to the beginning of the public comment period start date.
 - Provide revised DRAFT TIP to FHWA and FTA for review prior to the beginning of the additional public comment period.
 - Make revised DRAFT TIP available in an accessible electronic format on the SEDA-COG website.

- ⑤ Adopt the TIP.
 - MPO adopts the final version of the TIP by vote of the MPO committee at a regularly scheduled public meeting and submits the adopted TIP package to PennDOT.
 - Make final version of the TIP available on the SEDA-COG website in an accessible electronic format.
 - Post notice of the TIP adoption to the SEDA-COG webpage.

Transportation Improvement Program (TIP) Amendments

Applies to interim revisions of the MPO TIP that occur between TIP Update cycles and qualify as Amendments per the SEDA-COG MPO TIP Revisions Procedures:

- Affects air quality conformity regardless of the cost of the project or the funding source.
- Adds a new project, deletes a project that utilizes federal funds, or federalizes a project that previously was 100% state and/or locally funded. A new project is a project that is not programmed in the current STIP/TIP and does not have previous federal obligations.
- Adds a new phase(s), deletes a phase(s), or increases/decreases a phase(s) of an existing project that utilizes federal funds where the modification exceeds \$2 million.
- Involves a change in the scope of work to a project(s) that would:
 - Result in an air quality conformity reevaluation.
 - Result in a revised total project estimate that exceeds the thresholds established between PennDOT and the MPO.
 - Result in a change in the scope of work on any federally-funded project that is significant enough to essentially constitute a new project.

- ① Release the Proposed TIP Amendment(s).
 - Make TIP amendment(s) available in an accessible electronic format on the SEDA-COG website.
 - Notify MPO Committee of the TIP amendment(s) via meeting packet distributed prior to committee meetings.
 - If action on a critical TIP amendment is needed between regularly scheduled MPO Committee meetings, a special meeting may be held to approve the amendment. Such special meetings will be advertised to the public and allow for in-person or virtual participation. The TIP amendment materials will be posted to the SEDA-COG website.

- ② Provide the proposed TIP amendment(s) to FHWA and FTA for review.

- ③ No public comment period required.

- ④ Adopt the TIP Amendment(s)
 - SEDA-COG MPO adopts the final version of the TIP Amendment(s) by vote of the MPO Committee at a regularly scheduled public meeting or during a special public meeting.
 - Make the final version of the TIP Amendment(s) available on the SEDA-COG website in an accessible electronic format.
 - Submit an eSTIP package after adoption to PennDOT/FHWA/FTA.

Transportation Improvement Program (TIP) Administrative Modifications

Applies to interim revisions of the MPO TIP that occur between TIP Update cycles and qualify as Administrative Modifications per the SEDA-COG MPO TIP Revisions Procedures.

- ① No public comment period required.
- ② Notify MPO Committee of the Administrative Modification(s) via meeting packet distributed prior to committee meetings.
- ③ Approve the TIP Administrative Modification(s).
 - SEDA-COG MPO approves the Administrative Modification(s) by vote of the MPO committee at a regularly scheduled public meeting.
 - Make the Administrative Modification(s) available as part of the MPO Committee Meeting packet and on the SEDA-COG website in an accessible electronic format.

Public Participation Plan (PPP) Update

Applies to periodic updates of the PPP.

- ① Conduct a review of the MPO's current Public Participation Plan.
 - Task MPO staff or a sub-group of the MPO Committee to review the current PPP and identify need and scope of updates required.
- ② Implement updates to the Public Participation Plan.
 - Determine whether the update will be completed by staff or with consultant help.
- ③ Release the DRAFT PPP for public and agency comment.
 - Provide the public with a reasonable opportunity to comment on the plan, including a public comment period of 45 calendar days. (*Federal*)
 - Provide the DRAFT PPP document to FHWA and FTA for review prior to the beginning of the public comment period.
 - Make DRAFT PPP available in an accessible electronic format on the SEDA-COG website.
 - Make DRAFT PPP available in a hard copy format at the SEDA-COG Office, county government offices, public transit agency offices, and PennDOT District 2-0 & 3-0 Offices.
- ④ Notify public and agencies of opportunities to comment.
 - Publish notifications at least 45 calendar days prior to the comment period ending date and at least 10 calendar days prior to the public meeting date:
 - Legal Notice to appear in *The Daily Item* newspaper, at a minimum.
 - Press Release distributed to other newspapers and broadcast media outlets.
 - Interested Parties notified via email using distribution list.
 - Web notification on the SEDA-COG webpage in an accessible electronic format.
 - Tribal outreach.
 - Conduct at least one (1) public meeting at an accessible location.
- ⑤ Document the public participation effort and record in the Activity Portfolio.
 - Document the participation activities conducted (Meeting Venue Checklist, Public Participation Meeting tracking form).
 - Compile comments received and generate responses to actionable comments that indicate how the comment was incorporated or why a different approach was taken.
 - Incorporate comments and Comment Responses into the FINAL PPP document.
 - Provide notification (by email) of the Comment Responses to all those who commented and provided email contact information.
- ⑥ If the final version of the PPP differs significantly from the version that was made available for public comment, provide an additional 7 calendar day public comment period.
 - Provide notification (by email) of the additional public comment period to the Interested Parties and all those who commented previously and provided email contact information prior to the beginning of the public comment period start date.
 - Provide revised PPP document to FHWA and FTA for review prior to the beginning of the additional public comment period.
 - Make revised PPP document available in an accessible electronic format on the SEDA-COG website.

Public Participation Plan (PPP) Update (continued)

- 7 Adopt the PPP.
 - MPO adopts the FINAL PPP by vote of the MPO committee at a regularly scheduled public meeting.
 - Make the FINAL PPP document available on the SEDA-COG website in an accessible electronic format.
 - Post notice of the PPP adoption to the SEDA-COG webpage.

7. MPO CONTACT INFORMATION

How to Get Involved

The SEDA-COG MPO provides information to the public via standard mailings, e-mail, social media, news media, and the SEDA-COG website. Public forums, public meetings, and special presentations are scheduled as needed or as requested by organizations. Persons wanting to get involved in the activities of the MPO, can do the following:

- Visit the Transportation section of the SEDA-COG website at:
www.seda-cog.org/departments/transportation
- View MPO meeting schedules, agendas, packets, and minutes that are posted in the Metropolitan Planning Organization section at:
www.seda-cog.org/departments/transportation/seda-cog-metropolitan-planning-organization
- Sign up for the MPO Interested Parties Database and email list by:
 - Contacting the MPO staff by phone at (570) 524-4491.
 - Submitting your contact information through the Comments page at:
www.seda-cog.org/departments/transportation/transportation-comments
- View notices of MPO public meetings, which are advertised in the legal notices of *The Daily Item* newspaper, at a minimum.
 - The MPO generally meets 6 times per year, from 9:30 AM to 11:30 AM at the SEDA-COG office (201 Furnace Road, Lewisburg, PA). Virtual participation is also available, and the access details are shared in meeting notices.
 - All MPO meetings are open to the public, and an opportunity for public comment is included on every MPO meeting agenda.
 - We recommend confirming all MPO meetings with SEDA-COG staff or via the SEDA-COG website.

Contact

For more information about this Public Participation Plan, please contact:

Steve Herman, Program Director
Transportation Planning
SEDA-COG
201 Furnace Road
Lewisburg, PA 17837
Phone: (570) 524-4491
Email: sherman@seda-cog.org

SUPPORTING APPENDIX

Appendix S.1	Statutes and Regulations for Public Participation
Appendix S.2	General Demographic Analysis
Appendix S.3	Demographic Analysis for Environmental Justice and Other Traditionally Underserved Populations
Appendix S.4	Documentation of Public Participation and Comment for the Public Participation Plan Update

APPENDIX S.1

STATUTES AND REGULATIONS FOR PUBLIC PARTICIPATION

Federal Acts & Regulations

Public participation in the transportation planning and programming process has been a priority for federal, state and local officials since the passage of the Intermodal Surface Transportation Efficiency Act (ISTEA) in 1991; its successors, the Transportation Efficiency Act for the 21st Century (TEA-21); the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); the Moving Ahead for Progress in the 21st Century Act (MAP-21); the Fixing America's Surface Transportation Act (FAST); and the current Infrastructure Investment and Jobs Act (IIJA). Therefore, the SEDA-COG MPO Public Participation Plan and Environmental Justice policies must reflect the mandates of ISTEA, TEA-21, SAFETEA-LU, MAP-21, FAST, IIJA, and subsequent Federal legislation.

In particular, the Federal regulation requiring an MPO's development of a public participation plan is found in 23 C.F.R. § 450.316.

The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

<http://www.gpo.gov/fdsys/pkg/CFR-2011-title23-vol1/xml/CFR-2011-title23-vol1-sec450-316.xml>

Environmental Justice (EJ)

Public participation must also take into consideration [Presidential Executive Order 12898](#), Environmental Justice. The U.S. Environmental Protection Agency defines Environmental Justice as the “fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies.” Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies. Meaningful involvement means that people have an opportunity to participate in decisions about activities that may affect their environment and/or health. **Appendix S.3** includes a map of minority and low-income populations identified for the region's PPP update, based on the U.S. Census Bureau's American Community Survey data.

The Federal Highway Administration articulates three fundamental EJ principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Title VI of the Civil Rights Act

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

[Title VI of the Civil Rights Act of 1964](#) is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin. All programs administered by a federal aid recipient must be provided in accordance with Title VI per the [Civil Rights Restoration Act](#).

There are many forms of illegal discrimination based on race, color, or national origin that can limit the opportunity of minorities to gain equal access to services and programs. Among other things, recipients of federal funds cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or
- Segregate or separately treat individuals in any matter related to the receipt of any services, aid, or benefit.

Americans with Disabilities Act (ADA)

The [Americans with Disabilities Act of 1990](#) prohibits discrimination on the basis of disability by public entities in services, programs and activities. Public entities are required to make programs and services accessible to individuals with disabilities, including conducting meetings and hearings in ADA-compliant buildings. Special accommodations must be provided to ensure communications are equally effective for persons with disabilities in order to participate in meetings, planning, and programming activities.

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency

Signed by the President on August 11, 2000, this [Executive Order](#) requires federal agencies to examine the services they provide, identify any need for services to those with limited English

proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Commonwealth of Pennsylvania Acts & Regulations

Sunshine Act (65 PA C.S. § 701-716)

The [Pennsylvania Sunshine Act](#) requires agencies to deliberate and take official action on agency business in an open and public meeting. It requires that meetings have prior notice, and that the public can attend, participate, and comment before an agency takes official action. The openness keeps residents more informed and allows for increased public confidence in governing bodies. Major provisions of the Act are:

- All meetings or hearings of every agency at which formal action is taken are public meetings and shall be open to the public. The board or council has the option to accept all public comment at the beginning of the meeting.
- No formal action shall be valid unless formal action is taken during a public meeting.
- An agency may hold an executive session for a limited set of reasons. The reason for holding the executive session must be announced at the open meeting occurring immediately prior or subsequent to the executive session.
- The minutes of a public meeting of an agency shall be promptly recorded and open for examination and inspection by citizens of the Commonwealth. A person attending a meeting of an agency shall have the right to use recording devices to record all the proceedings.
- Every agency shall hold public meetings at specified times and places of which previous notice must be given by posting notice of the public meetings at the principal office of the agency or the building where the meeting is to be held.
- Public notice of meeting times and locations shall be published in a newspaper of general circulation.

The above statutes/regulations ensure that planning and public involvement activities are conducted fairly and in consideration of all people. It is important to the SEDA-COG MPO that all people have an equal voice and chance to share their needs and concerns related to the transportation network. Although there are no areas in Pennsylvania under the jurisdiction of Indian Tribal governments, SEDA-COG MPO considers federally-recognized Tribes to be interested parties. Therefore, SEDA-COG MPO sends transportation planning and programming materials (e.g., TIP, LRTP, PPP) to representatives of federally recognized Tribes that have interests in the 8-county MPO region to provide opportunities for review and comment.

APPENDIX S.2

GENERAL DEMOGRAPHIC ANALYSIS

Table S.2.1 gives county, MPO, and state population statistics since the 2000 Census. Approximately 364,000 people live in the SEDA-COG MPO region, according to the 2020 Census. The MPO’s population increased at a rate of 0.2% since the 2000 Census. The largest levels of population growth were seen in Snyder and Union Counties during the 20-year period. The highest rates of growth on a percentage basis were seen in Snyder and Juniata Counties. Minimal population growth and population declines in certain MPO counties is likely due to the COVID-19 pandemic, closing of several large manufacturers in the region, and potential issues with accurate data collection during the 2020 Census.

Table S.2.1. Population of SEDA-COG MPO Counties

County/Area	2000 Census	2010 Census	2020 Census	Numeric Change 2000-2020	% Change 2000-2020
Clinton	37,914	39,238	37,450	-464	-1.2%
Columbia	64,151	67,295	64,727	576	0.9%
Juniata	22,821	24,636	23,509	688	3.0%
Mifflin	46,486	46,682	46,143	-343	-0.7%
Montour	18,236	18,267	18,136	-100	-0.5%
Northumberland	94,556	94,528	91,647	-2,909	-3.1%
Snyder	37,546	39,702	39,736	2,190	5.8%
Union	41,624	44,947	42,681	1,057	2.5%
SEDA-COG MPO	363,334	375,295	364,029	695	0.2%
Pennsylvania	12,281,054	12,702,379	13,002,700	721,646	5.9%

Source:
U.S. Census Bureau: Decennial Censuses

Figure S.2.1 gives population density within the SEDA-COG MPO Counties in 2020.

Table S.2.2 shows historic county, MPO, and state population statistics since the 1990 Census. Since 1990, the MPO’s population has grown moderately.

Figure S.2.1. Population Density, SEDA-COG MPO Counties, 2020

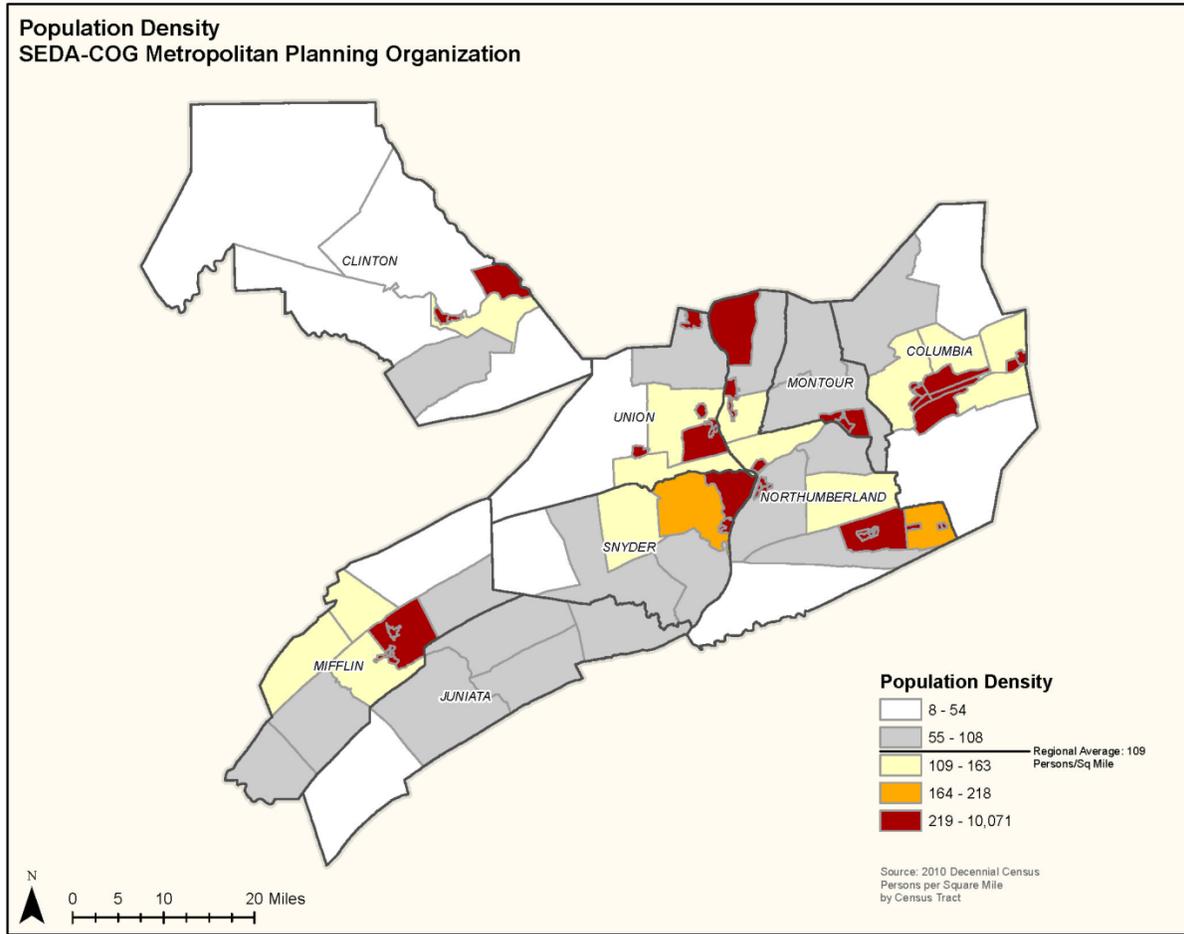


Table S.2.2. Historic Population and Growth of SEDA-COG MPO Counties, 1990-2020

County/Area	2020	2010	2000	1990	% Change 1990-2020	% Change 2000-2020	% Change 2010-2020
Clinton	37,450	39,238	37,914	37,182	0.7%	-1.2%	-4.6%
Columbia	64,727	67,295	64,151	63,202	2.4%	0.9%	-3.8%
Juniata	23,509	24,636	22,821	20,625	14.0%	3.0%	-4.6%
Mifflin	46,143	46,682	46,486	46,197	-0.1%	-0.7%	-1.2%
Montour	18,136	18,267	18,236	17,735	2.3%	-0.5%	-0.7%
Northumberland	91,647	94,528	94,556	96,771	-5.3%	-3.1%	-3.0%
Snyder	39,736	39,702	37,546	36,680	8.3%	5.8%	0.1%
Union	42,681	44,947	41,624	36,176	18.0%	2.5%	-5.0%
SEDA-COG MPO	364,029	375,295	363,334	354,568	2.7%	0.2%	-3.0%
Pennsylvania	13,002,700	12,702,379	12,281,054	11,881,643	9.4%	5.9%	2.4%

Source:
U.S. Census Bureau: Decennial Censuses.

APPENDIX S.3

DEMOGRAPHIC ANALYSIS FOR ENVIRONMENTAL JUSTICE AND OTHER TRADITIONALLY UNDERSERVED POPULATIONS

In response to the identified EJ policies, a distributive geographic analysis was conducted to identify the locations and concentrations of minority, low-income, limited English proficiency, and other traditionally underserved populations (TUP). The preparation of such a demographic profile describes the social composition of the SEDA-COG MPO region and illustrates how demographic patterns vary spatially.

The identification of these populations is a first step toward establishing effective strategies for engaging them in the transportation planning process. The mapping not only aids in the development of an effective public involvement program but also provides a baseline for assessing impacts of the transportation investment program.

Distributive Analysis Methodology

Datasets and mapping were assembled as a baseline inventory of demographic attributes for the following populations that are traditionally underserved by the transportation system:

- Minority
- Low-Income (In-Poverty)
- Seniors (Elderly)
- Disabled
- Those with limited English proficiency (LEP)
- Those with no personal vehicle available (zero-vehicle households)
- Female Head of Household with Own Children Present

The primary and most comprehensive data source for information on these populations is the U.S. Census Bureau—particularly the American Community Survey. The primary dataset referenced in this appendix is the 5-year Estimates for 2015-2019.

U.S. Census Data

Using a geographic information system, spatial and demographic data from the U.S. Census Bureau were compiled at the Census tract level of geographic detail. **Table S.3.1** provides a profile of the Environmental Justice and Other Traditionally Underserved Populations in the SEDA-COG MPO region according to data from the U.S. Census Bureau's American Community Survey. The Regional Thresholds for each population are established as the average concentration of that population across the SEDA-COG MPO region as a whole. The Data Universe varies according to U.S. Census data collection and accounting methodology for that population.

Table S.3.1. Profile of Environmental Justice and Other Traditionally Underserved Populations in the SEDA-COG MPO Region

	SEDA-COG MPO Region	
	Population	Regional Threshold (Average Concentration)
Data Universe: Total Population	371,144	
<i>Minority Population</i> ¹	27,244	7.3%
<i>Senior Population</i> ²	72,572	19.6%
Data Universe: Total Population for whom Poverty Status is determined	347,331	
<i>Low-Income Population</i> ³	45,320	13.0%
Data Universe: Total Population Age 5 or Older	351,814	
<i>Limited English Proficiency Population</i> ⁴	6,905	2.0%
Data Universe: Total Civilian Non-Institutionalized Population	358,684	
<i>Disabled Population</i> ⁵	53,075	14.8%
Data Universe: Total Households	145,283	
<i>Zero Vehicle Households</i> ⁶	13,508	9.3%
<i>Female Head of Household with Children</i> ⁷	5,293	3.6%

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

Notes:

- ¹ Minority Population: Table DP5, ACS Demographic and Housing Estimates, HISPANIC OR LATINO AND RACE – Calculated as “Total Population” minus “Total Population: Not Hispanic or Latino: White Alone”.
- ² Senior Population: Table DP5, ACS Demographic and Housing Estimates, SEX AND AGE – Value given as “Total Population: 65 years and over”.
- ³ Low-Income Population: Table S1701, Poverty Status in the Past 12 Months – Value given as “Population for whom poverty status is determined: Below poverty level”.
- ⁴ Limited English Proficiency Population: Table DP2, Selected Social Characteristics in the United States, LANGUAGE SPOKEN AT HOME – Value given as “Population 5 years and over: Language other than English: Speak English less than “very well””.
- ⁵ Disabled Population: Table DP2, Selected Social Characteristics in the United States – Value given as “Total civilian noninstitutionalized population: With a disability”.
- ⁶ Zero Vehicle Households: Table B08201, Household Size by Vehicles Available – Value given as “Total Households: No vehicle available”.
- ⁷ Female Head of Household with Children: Table DP2, Selected Social Characteristics in the United States, HOUSEHOLDS BY TYPE – Value given as “Female householder, no spouse/partner present: With own children under 18 years”.

Mapping Methodology

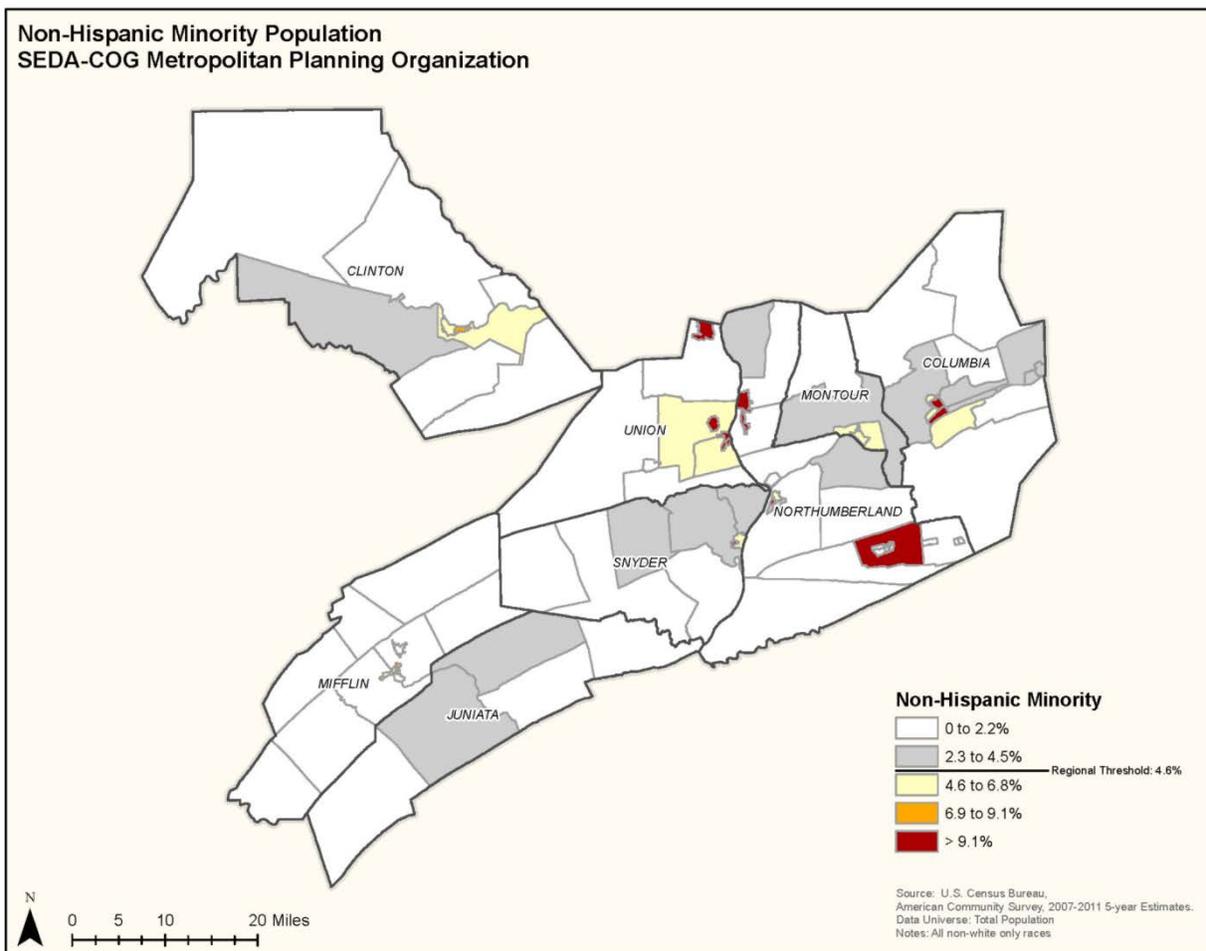
Mapping of Census data was completed individually for each population according to the concentration of the population within each geographic area (Census tract). The mapped concentration is represented using 5 classes, which are related to the Regional Average Concentration (Regional Threshold) shown in **Table S.3.1**, as follows:

Class 1	0 to ½ of the Regional Threshold
Class 2	½ of the Regional Threshold to Regional Threshold
Class 3	Regional Threshold to 1½ times the Regional Threshold
Class 4	1½ times the Regional Threshold to 2 times the Regional Threshold
Class 5	Greater than 2 times the Regional Threshold

Racial Non-Hispanic Minority Populations

Minority is defined as any individual or group that self identifies as a member(s) of the racial categories Black/African American, Asian American, American Indian/Alaskan Native, Native Hawaiian/other Pacific Islander and the ethnic category Hispanic/Latino. Mapping below shows racial and ethnic minority population distributions.

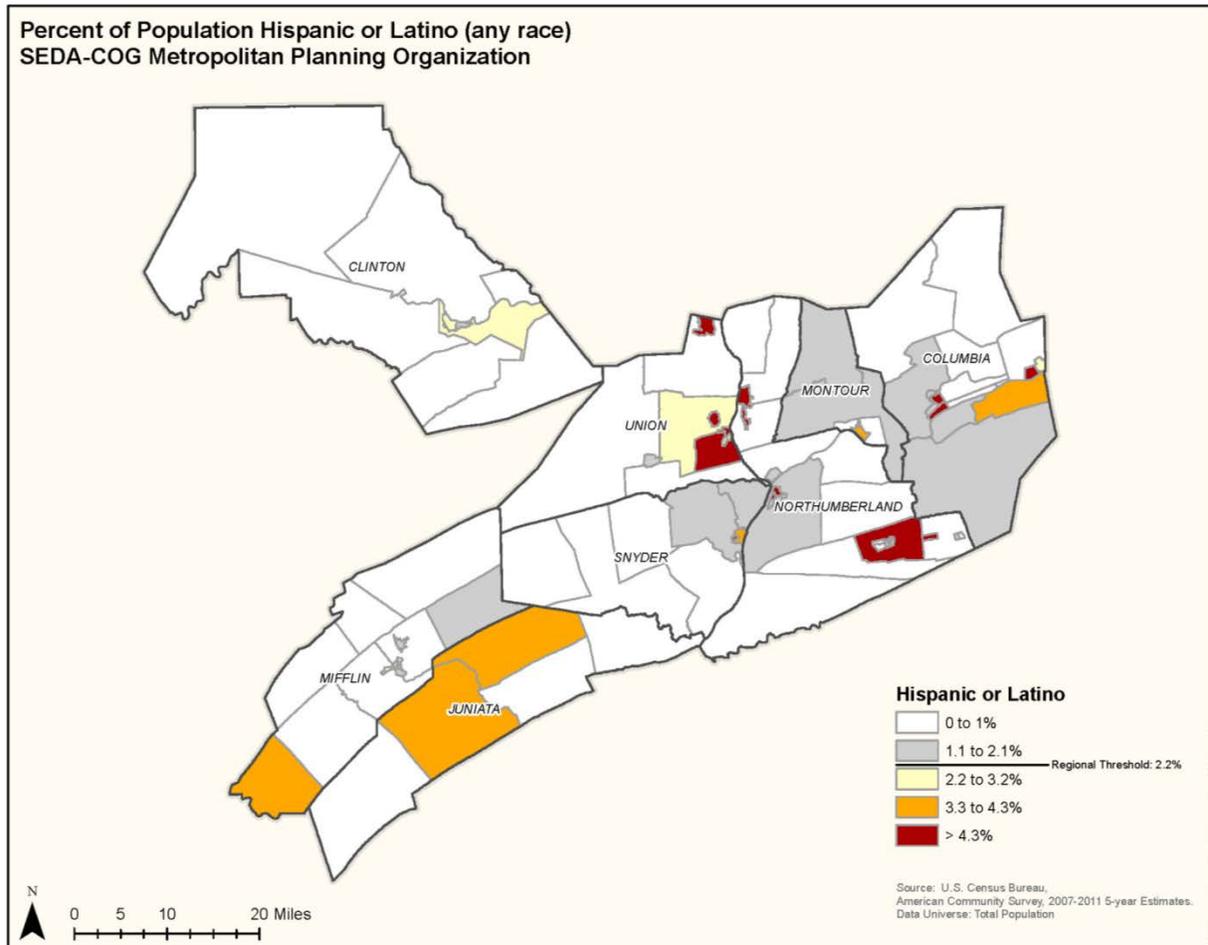
Minority population is defined as any readily identifiable group of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed DOT program, policy, or activity.”



Ethnic Minority Population

U.S. federal government agencies, including the Census Bureau, adhere to standards issued by the Office of Management and Budget (OMB) which specify that race and Hispanic origin (also known as ethnicity) are two separate and distinct concepts. The race and ethnicity categories generally reflect social definitions in the U.S., and they are not an attempt to define race and ethnicity biologically, anthropologically, or genetically.

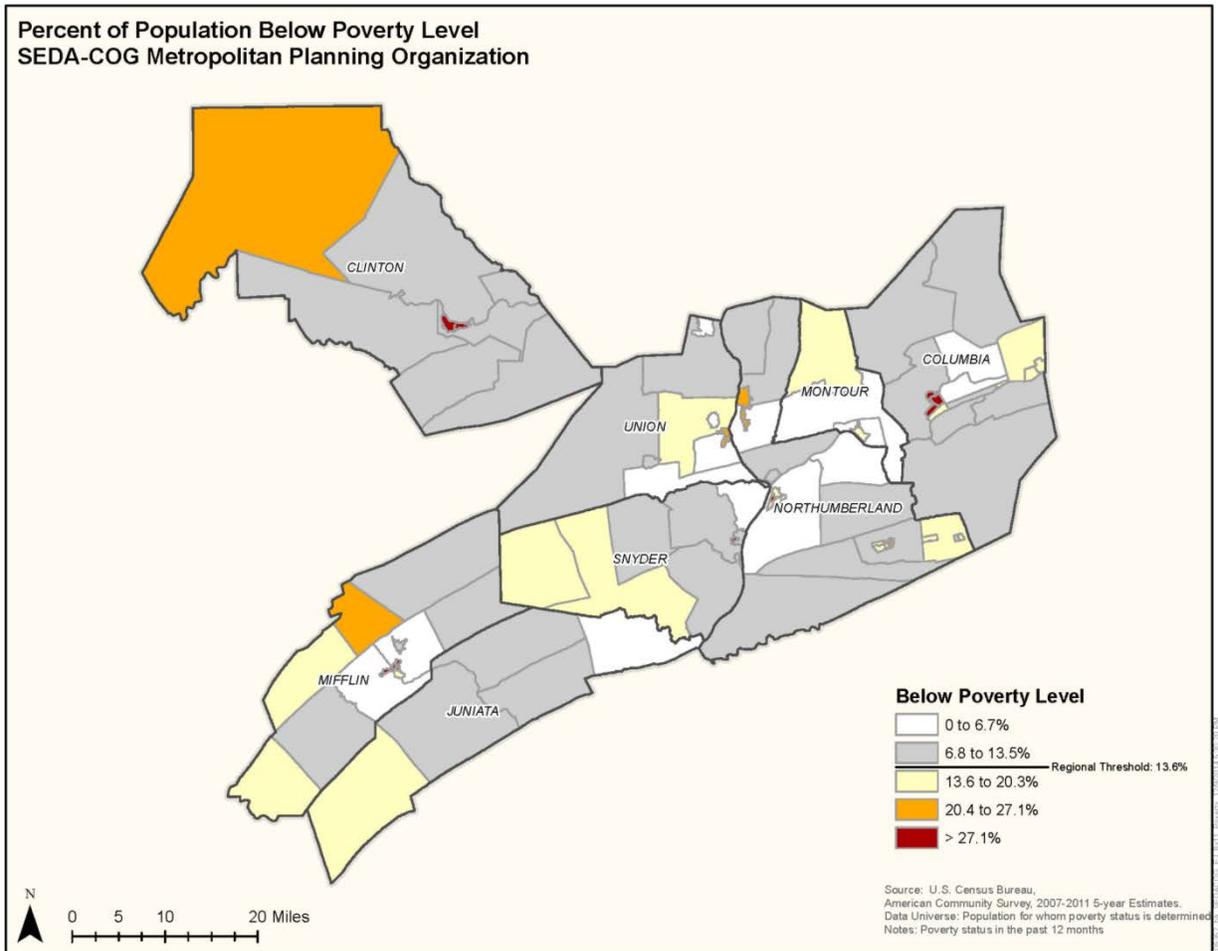
Ethnic minority population includes those who self-identify as “Hispanic or Latino,” which refers to a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.



Low-Income Populations

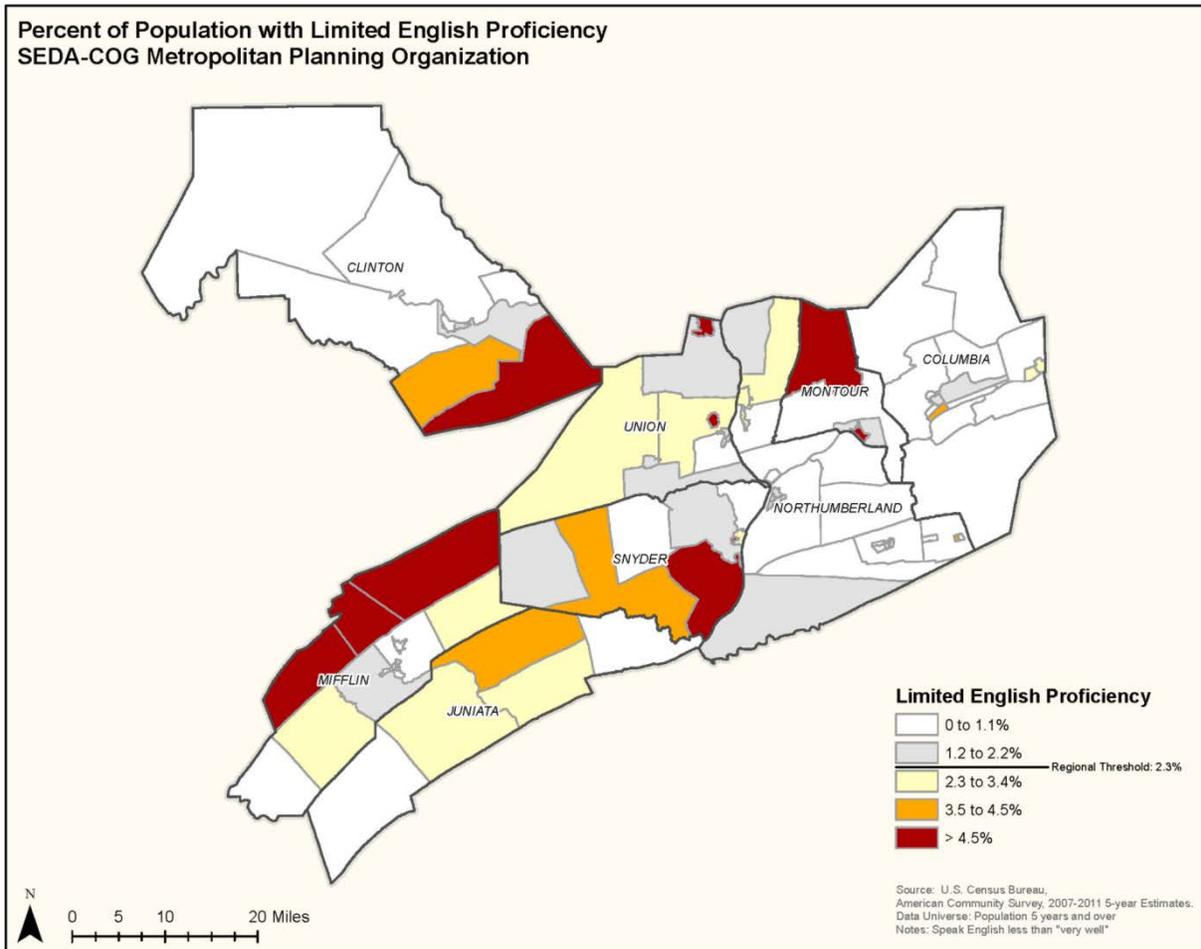
Executive Order 12898 on Environmental Justice and the *USDOT Order on Environmental Justice* specifically identify low-income populations as a group to be considered in the long-range transportation plan when identifying and addressing the impacts of the transportation investment program. USDOT defines “low-income populations” as those having a median household income that is at or below the Department of Health and Human Services’ poverty guidelines. Since information from the U.S. Census Bureau informs these guidelines, the Census’s “In-Poverty Status” indicator was used to identify low-income populations.

To prevent bias, the percentage below poverty level is calculated using the “Population for which Poverty Status is determined.” The Census determination of poverty level is based on family size, composition, and income. If a family’s total income is less than the threshold for that family type, then each person in the family is considered to be “in-poverty.” While the income thresholds do not vary by geographic region, they are updated annually according to the Consumer Price Index.



Limited English Proficiency Population

Executive Order 13166 on Improving Access to Services for Persons with Limited English Proficiency (LEP) aims “to improve access to federally-conducted and federally-assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency.” An operative definition for an individual with limited English proficiency may be stated as those individuals who have a limited ability to read, write, speak or understand the English language. This Department of Justice definition is derived from *Title VI of the Civil Rights Act*, which prohibits recipients from discriminating on the basis of race, color or national origin, and contemplates a close relationship between one’s national origin and one’s language. For the purpose of this analysis, LEP persons include those who speak the English language “less than very well,” as classified by the Census. It should be noted that ability to speak English is based upon self-reporting or upon an answer given by another member of the household.

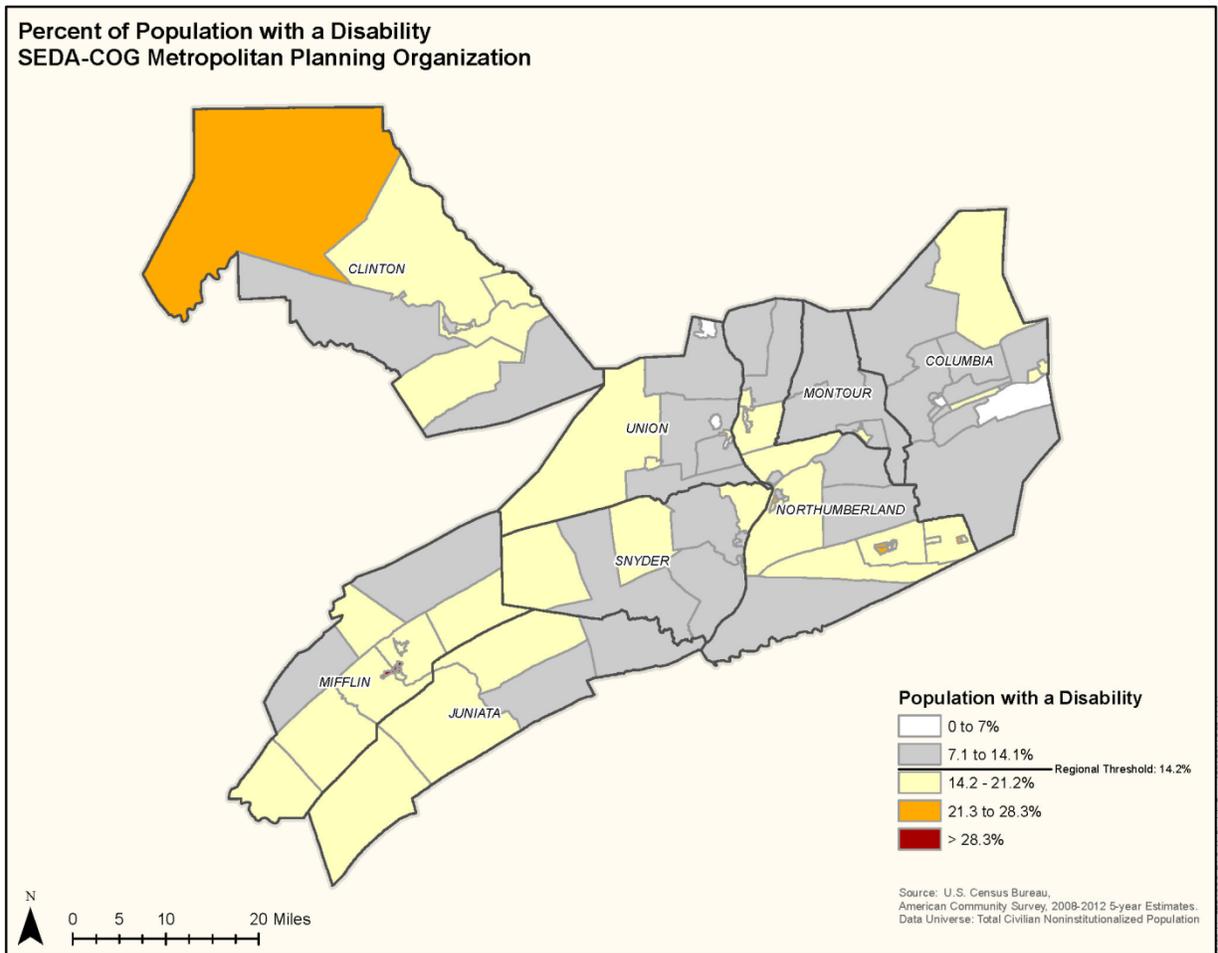


Disabled Population

The Americans with Disabilities Act of 1990, along with the Americans with Disabilities Act Amendments Act of 2008, prohibit discrimination on the basis of disabilities. The term “disability” means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more major life activities of such individual;
- A record of such an impairment; or
- Being regarded as having such an impairment, which includes the circumstance where an individual has been subjected to actions prohibited under the ADA Act because of an actual or perceived physical or mental impairment.

The ADA Amendments of 2008 were enacted to provide “a clear and comprehensive national mandate for the elimination of discrimination” and “clear, strong, consistent, enforceable standards addressing discrimination.”

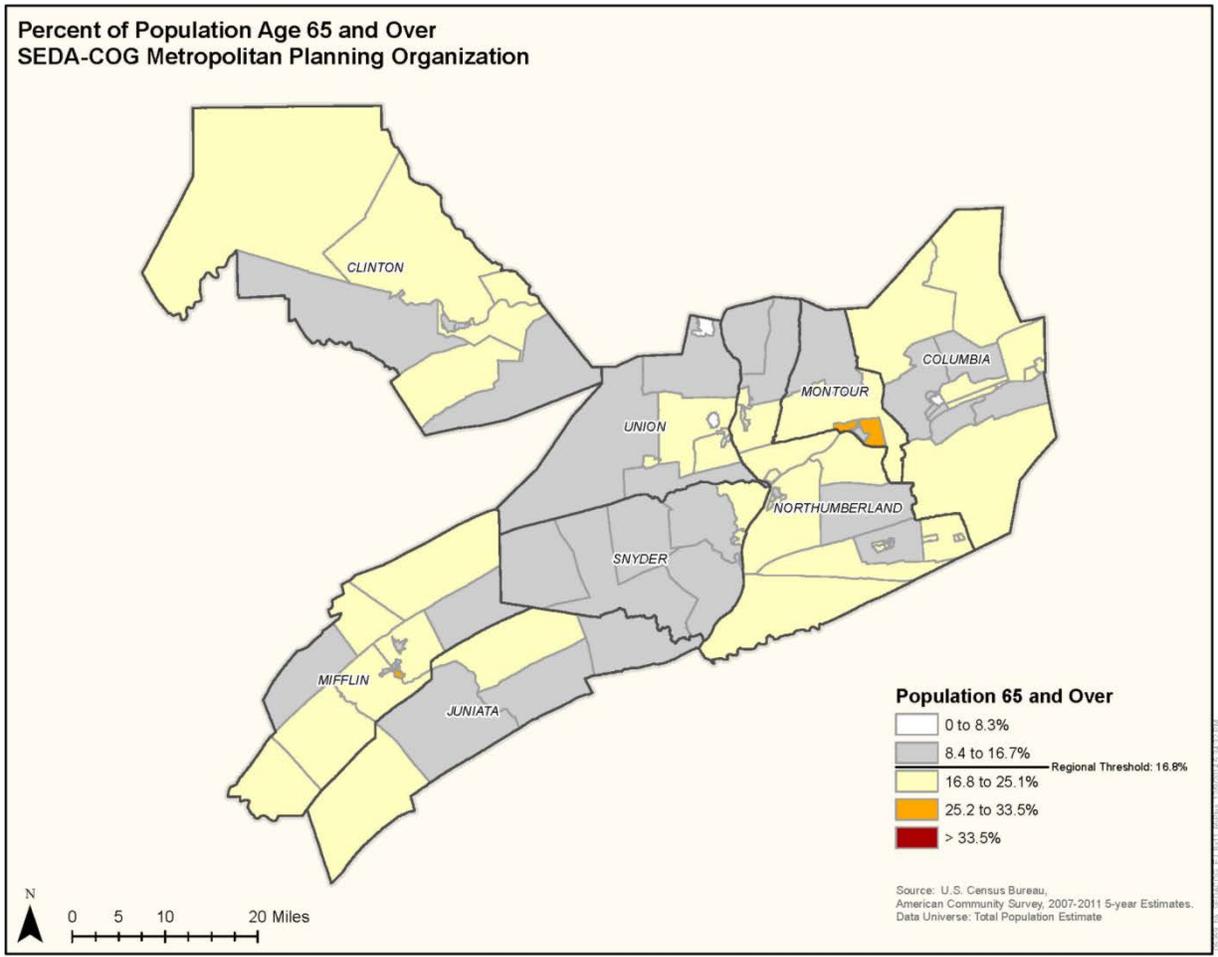


Senior Population

The *Age Discrimination Act of 1975*, which prohibits discrimination on the basis of age, states:

No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

For the purposes of this public participation plan, the application of the Age Discrimination Act is made for the Senior (Elderly) population—persons age 65 and over. The population of the United States is aging rapidly, with the median age increasing from 28 in 1970 to 38.5 in 2019. In the upcoming decades, cumulative advances in medicine and nutrition, as well as improvements in environmental quality, are anticipated to amplify this trend, and the Senior population will continue to expand as the “Baby Boomer” generation ages.

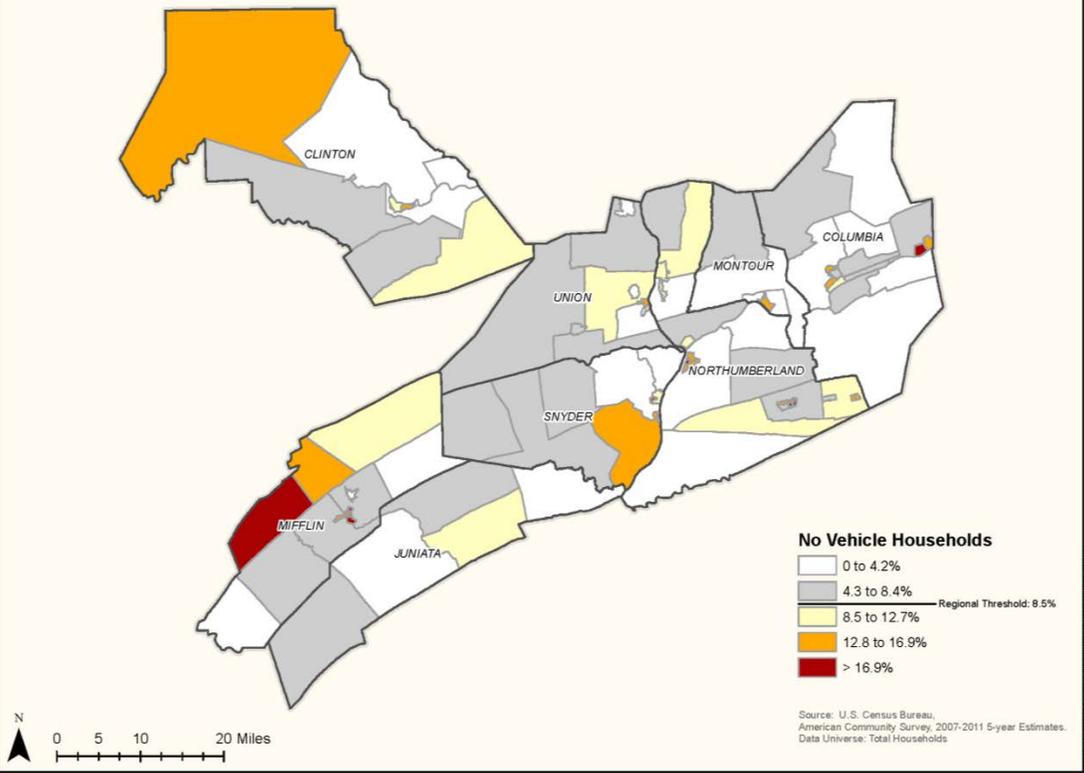


Zero-Vehicle Households
Female Headed Households with Children Present

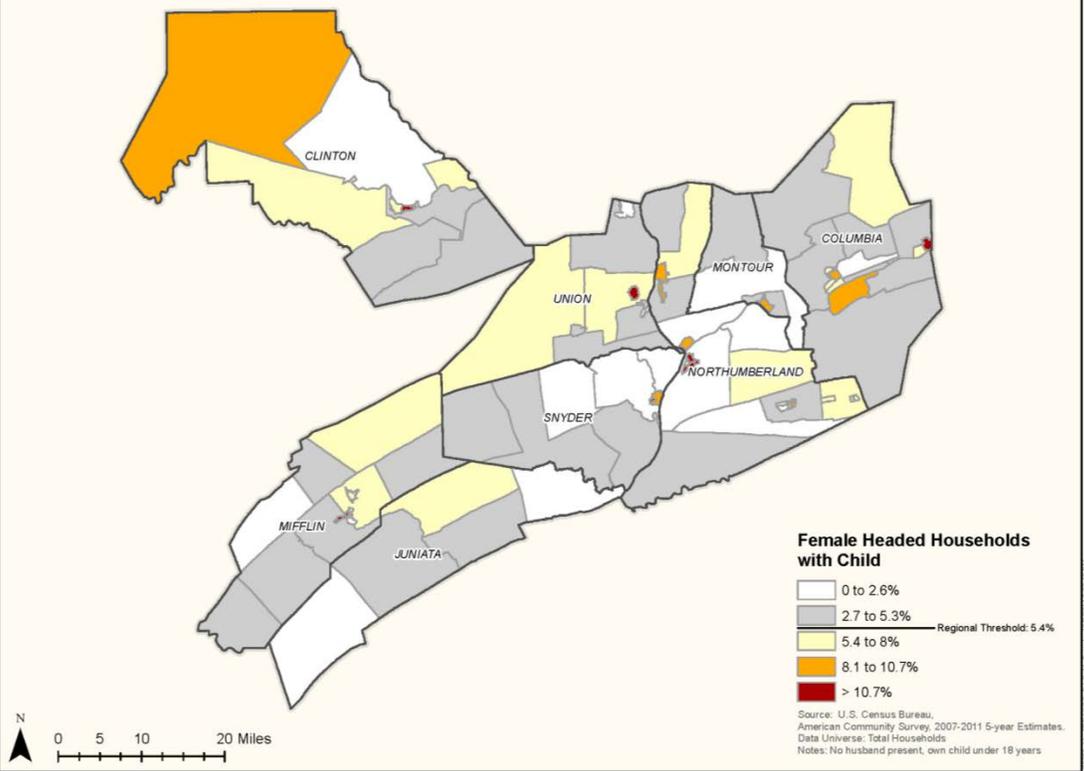
While not afforded specific protections under an Executive Order or Federal or State Act, households with these demographic characteristics face unique transportation challenges and are considered in this analysis as traditionally underserved populations.

Zero-vehicle households are those households without direct ownership of an automobile and tend to be highly transit-dependent. In the U.S., the transportation program has traditionally favored investments in highway infrastructure, and the vast majority of all personal travel occurs on the highway system via personal automobile. Female headed households with children but no spouse present tend to have lower income levels.

Percent of Households Without Access to a Vehicle
SEDA-COG Metropolitan Planning Organization

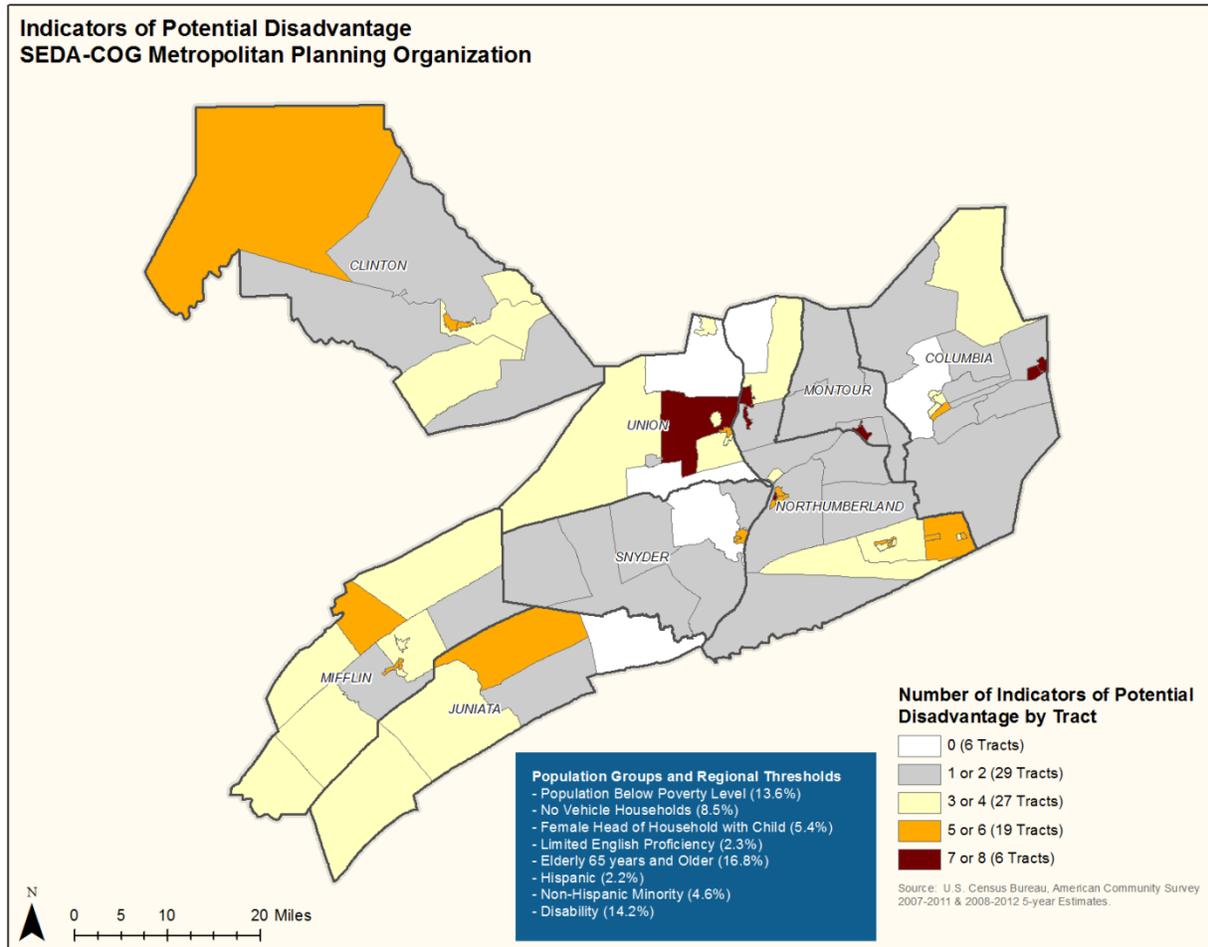


Percent of Female Headed Households with Own Children Present
SEDA-COG Metropolitan Planning Organization



Indicators of Potential Disadvantage

The eight (8) maps of the various EJ and other traditionally underserved populations were combined into a single map of “Indicators of Potential Disadvantage,” which illustrates the overlap of populations within the region’s Census Tracts. The intensity of the overlap is represented by the number of populations in each tract that exceed the Regional Thresholds established in Table S.3.1.



Note: While this is a convenient way to view the distributions of EJ and Traditionally Underserved Populations, it is highly generalized and should not be divorced from the preceding analyses of individual populations. The knowledge of which specific populations are present and in what concentrations is far more constructive in the development and execution of an effective public participation plan.

Evaluating Trigger Criteria for Conducting Targeted Outreach

In Section 6 of the PPP, the Process Checklists for the Long-Range Transportation Plan Amendment and Transportation Improvement Program Amendment include trigger criteria for conducting targeted outreach to minority, in-poverty, limited English proficient (LEP), and disabled populations. The data and mapping below are intended to assist in evaluating these criteria.

Trigger Criteria

The trigger criteria for conducting targeted outreach are stated within the Process Checklists as follows:

Determine the need to provide targeted outreach for project amendments that disproportionately burden populations or concentrations of Minority, In-Poverty, LEP or Disabled Persons.

TRIGGER: Burdensome action or project in an area defined by one or both of the following:

- a. In a project area where the likely affected Minority, In-Poverty, LEP or Disabled persons exceeds 1,000 persons or,*
- b. In a Census tract where the concentration of Minority, In-Poverty, LEP, or Disabled persons exceeds two times the regional average for that population.*

*** In the event that a West Germanic LEP population is the trigger, the outreach may be waived if representatives of the West Germanic-speaking community indicate that the outreach activity is not desired.*

*** Targeted outreach will not be required in the event that the trigger results from an institutionalized population (e.g., within a prison, penitentiary, etc.).*

Tracts Meeting Trigger Criteria

The following provides an initial evaluation of the two triggers and describes the tracts where the criteria are met, according to the current data.

Trigger (a) – According to the 2015-2019 American Community Survey data, no tracts currently meet this trigger criteria, even if the entire Minority, In-Poverty, LEP or Disabled populations residing within each tract were considered “likely affected.” However, this situation may change in the future and will be evaluated in future demographic analyses. The 1,000-person standard was adapted from the U.S. Department of Justice’s Safe Harbor Provision.

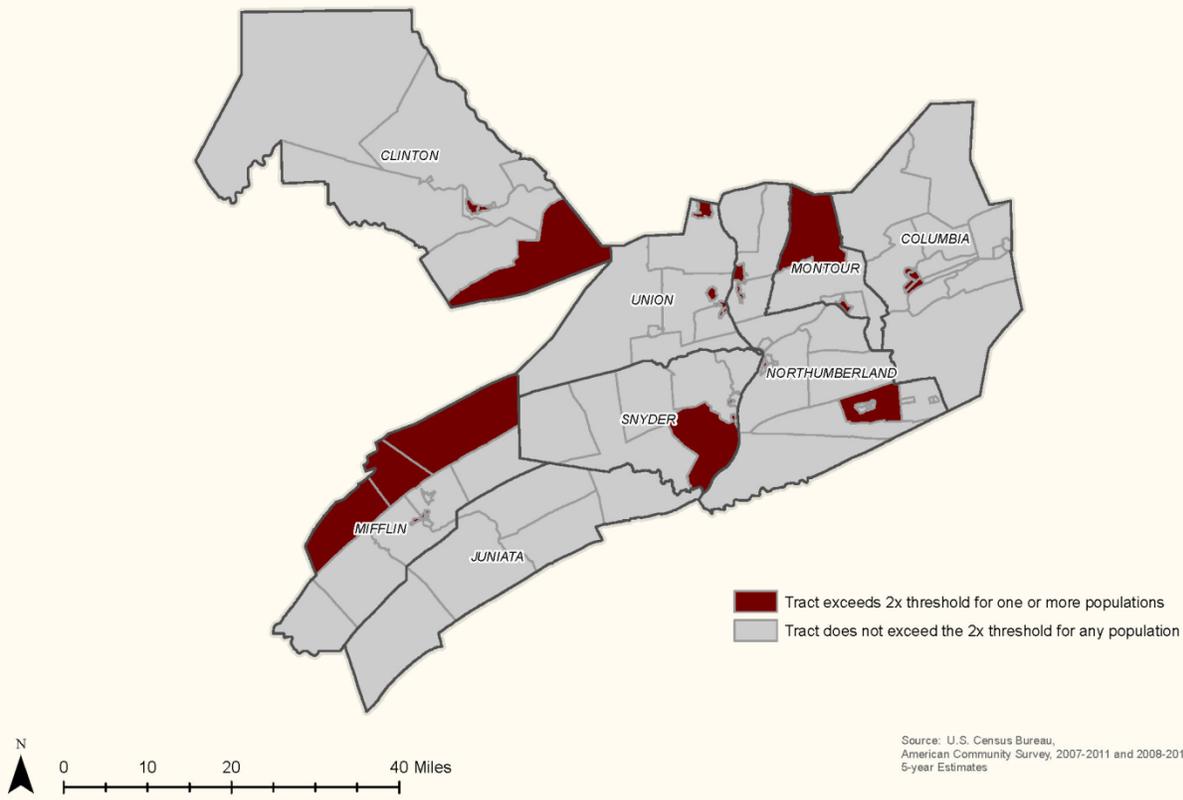
Trigger (b) – The table and map below describe the 22 tracts that exceed this trigger criterion for one or more of the Minority, In-Poverty, LEP or Disabled population groups. Each county in the SEDA-COG MPO contains at least one tract that meets the trigger.

County	# of Tracts	Description of Tracts & Communities	Triggering Populations
Clinton	3	Tracts occur in and around Lock Haven and the rural agricultural valleys in the southern portion of the county.	<ul style="list-style-type: none"> • Lock Haven – In-Poverty • Southern Clinton County – LEP (West Germanic)
Columbia	3	Tracts occur in and around Bloomsburg.	<ul style="list-style-type: none"> • Bloomsburg – Minority and In-Poverty
Montour	2	Tracts occur in and around Danville and the rural agricultural valleys in the northern portion of the county.	<ul style="list-style-type: none"> • Danville – LEP (Spanish) • Northern Montour County – LEP (West Germanic)
Union	4	Tracts occur in and around Lewisburg and at the penitentiary facilities in the northern part of the county.	<ul style="list-style-type: none"> • Lewisburg – Minority • Penitentiaries – Minority, In-Poverty, LEP (Spanish)

County	# of Tracts	Description of Tracts & Communities	Triggering Populations
Mifflin	5	Tracts occur in and around Lewistown and in the rural agricultural valleys in the northern portion of the county.	<ul style="list-style-type: none"> Lewistown – In-Poverty, Disability Northern Mifflin County – LEP (West Germanic)
Northumberland	3	Tracts occur in and around Milton and at the penitentiary facility north of Shamokin.	<ul style="list-style-type: none"> Milton – Minority Penitentiary – Minority
Snyder	2	Tracts occur in and around Selinsgrove and in the rural areas in the southeast portion of the county.	<ul style="list-style-type: none"> Selinsgrove – Minority Southeastern Snyder County – LEP (West Germanic)
TOTAL	22		

Triggers for Conducting Targeted Outreach

Tracts with Populations that Exceed Double the Regional Threshold for Minority, In-Poverty, Limited English Proficiency, and/or Disability
 SEDA-COG Metropolitan Planning Organization



APPENDIX S.4

DOCUMENTATION OF PUBLIC PARTICIPATION AND COMMENT FOR THE PUBLIC PARTICIPATION PLAN UPDATE – TO BE INSERTED AFTER COMMENT PERIOD

- Legal Notice of the Public Comment Period and Public Meeting
- Press Release announcing the Public Comment Period and Public Meeting
- Webpage Notices of the Public Comment Period and Public Meeting
- Correspondence with Interested Parties regarding the Public Comment Period and Public Meeting
- Record of the Public Meeting
 - Public Meeting Plan
 - Sign-In Sheet
 - Informational Handout
 - Display Materials & Boards
 - Sample Comment Form
 - Comments Received
- Comment and Response Tracking

RESOURCE APPENDIX

Appendix R.1	Interested Parties Distribution Lists
Appendix R.2	Public Participation Event Checklists and Tools
Appendix R.3	Outreach Strategies
Appendix R.4	Language Assistance Plan
Appendix R.5	Evaluation Process for the Public Participation Plan

APPENDIX R.1

INTERESTED PARTIES DISTRIBUTION LISTS

SEDA-COG MPO Members (Full Copy of Draft Plan/TIP)

1. Clinton County – Katie de Silva, County Planning Director
2. Columbia County – Eric Stahley, County Resiliency Officer
3. Juniata County – Brad Kerstetter, County Planning Director
4. Mifflin County – Mark Colussy, County Planning Director
5. Montour County – Greg Molter, County Planning Director
6. Northumberland County – Justin Skavery, County Planning Director
7. Snyder County – Lincoln Kaufman, County Planning Director
8. Union County – Shawn McLaughlin, County Planning Director
9. SEDA-COG Board of Directors – Commissioner Richard Ridgway
10. Transit Representative – Michele Holman, rabbittransit Assistant General Manager
11. Multi-modal Representative – Stephen Phillips
12. PennDOT Central Office – Carey Mullins, Transportation Planning Specialist
13. PennDOT District 2-0 – Mark Schultz, Planning and Programming Manager
14. PennDOT District 3-0 – Jonathan Ranck, Transportation Planning Specialist
15. Town of Bloomsburg – Lisa Dooley, Town Administrator
16. Berwick Borough – Jack Kytte, Public Works Foreman

Counties and Municipalities (Notice Only)

1. Clinton County Board of Commissioners
2. Columbia County Board of Commissioners & Planning Director
3. Juniata County Board of Commissioners
4. Mifflin County Board of Commissioners
5. Montour County Board of Commissioners
6. Northumberland County Board of Commissioners
7. Snyder County Board of Commissioners
8. Union County Board of Commissioners
9. All municipalities in the 8-county MPO

Legislators – Federal & State (Notice Only)

1. Senator Bob Casey
2. Senator Pat Toomey
3. Congressman Glenn Thompson
4. Congressman Fred Keller
5. Congressman Dan Meuser
6. State Senator Gene Yaw
7. State Senator John Gordner
8. State Senator Jake Corman
9. State Senator Cris Dush

10. State Representative Stephanie Borowicz
11. State Representative Joe Hamm
12. State Representative Johnathan Hershey
13. State Representative David Rowe
14. State Representative Kurt Masser
15. State Representative Lynda Schlegel Culver
16. State Representative David Millard
17. State Representative Rich Irvin
18. State Representative Kerry Benninghoff

Transit Providers (Full Copy of Draft Plan/TIP)

1. Call A Ride Service, Inc. (Juniata/Mifflin Counties)
2. Lower Anthracite Transportation System (Northumberland County)
3. rabbittransit (Columbia/Montour/Northumberland/Snyder/Union Counties)
4. STEP, Inc. (Clinton/Lycoming Counties)

Freight Providers (Notice Only)

1. Canadian Pacific
2. Con-Way Central Express
3. Federal Express
4. Milton Transportation
5. Moran Logistics
6. Norfolk Southern
7. North Shore Railroad Company
8. Reading & Northern Railroad Company
9. SEDA-COG Joint Rail Authority (Non-operator railroad)
10. United Parcel Services
11. Ward Trucking
12. Watsontown Trucking
13. XPO
14. Yellow Transportation

Human Service Agencies (Notice Only)

1. AARP
2. ACTION Health
3. The Advocacy Alliance
4. AGAPE
5. Allied Services
6. American Cancer Society
7. The Arc of Susquehanna Valley
8. Berwick Area United Way
9. Buffalo Valley Nursing Home
10. Caring Communities
11. Center for Independent Living of North Central PA

12. Center for Independent Living of Central PA
13. Center for Independent Living of Northeast PA
14. Central PA Workforce Development Corporation
15. Central Susquehanna Opportunities, Inc.
16. Clinton County Assistance Office
17. Clinton County Housing Authority
18. Clinton County United Way
19. CMSU
20. Columbia and Montour County Assistance Offices
21. Columbia County Housing Authority
22. Columbia County Human Services
23. Columbia/Montour Aging Office, Inc.
24. Community Services Group
25. Community Strategies Group
26. CSIU
27. DAVITA Dialysis
28. Donald Heiter Community Center
29. Elmcroft Senior Living
30. Evangelical Community Hospital
31. Family Service Association
32. Focus Health LLC
33. Foster Grandparent Program of Central PA
34. Geisinger Health Plan
35. Geisinger Health System
36. Geisinger HealthSouth Rehabilitation Hospital
37. Geisinger Home Care
38. Grayson View
39. Greater Susquehanna Valley United Way
40. Grey Medical Advocate, LLC
41. Hope Enterprises
42. Housing Authority of Northumberland County
43. Keystone Human Services of North Central PA
44. LIFE Geisinger
45. Living Unlimited, Inc.
46. Mental Health Association
47. Mifflin-Juniata Area Agency on Aging
48. Mifflin-Juniata County Human Services
49. Mifflin-Juniata Literacy Program
50. Mifflin-Juniata Regional Services Corporation
51. Montour County Housing Authority
52. North Central Sight Services
53. Northumberland County Area Agency on Aging
54. Nottingham Village Senior Living Community
55. PA CareerLink

56. PA Statewide Independent Living Council
57. Pennsylvania Health Management
58. RiverWoods
59. SEDA-COG Housing Development Corporation
60. Service Coordination Unlimited
61. Snyder County Housing Authority
62. Square One Clubhouse
63. STEP, Inc.
64. SUMMIT Early Learning
65. Sunbury Housing Authority
66. Suncom Industries
67. Transitions
68. The Manor at Penn Village
69. Union County Assistance Office
70. Union County Housing Authority
71. Union/Snyder Area Agency on Aging
72. Union-Snyder Community Action Agency
73. United Cerebral Palsy of Central PA
74. United Disability Services
75. United Way of Columbia and Montour County
76. United Way of Mifflin-Juniata
77. UPMC Susquehanna

Economic Development Agencies (Notice Only)

1. Berwick Industrial Development Association
2. Central PA Chamber of Commerce
3. Clinton County Economic Partnership
4. Columbia Montour Chamber of Commerce
5. Danville Business Alliance
6. Downtown Bloomsburg, Inc.
7. Downtown Lewistown, Inc.
8. DRIVE
9. Greater Susquehanna Valley Chamber of Commerce
10. Juniata Business & Industry, Inc.
11. Juniata River Valley Chamber of Commerce
12. Mifflin County Industrial Development Corporation

Environmental and Recreation/Bike/Ped Agencies (Notice Only)

1. Anthracite Outdoor Adventure Area Authority
2. Buffalo Valley Recreation Authority
3. East Buffalo Township Pedestrian and Bike Committee
4. Lewisburg Neighborhoods Corporation
5. Merrill W. Linn Land & Waterways Conservancy
6. Montour Area Recreation Commission

7. Northcentral Pennsylvania Conservancy
8. Penn State Cooperative Extensions
9. Susquehanna Greenway Partnership
10. Susquehanna River Basin Commission

State and Federal Agencies (Notice Only)

1. PA Department of Aging
2. PA Department of Agriculture
3. PA Department of Community and Economic Development
4. PA Department of Conservation and Natural Resources
5. PA Department of Environmental Protection
6. PA Department of Health
7. PA Department of Human Services
8. PA Dept. of Military & Veterans Affairs and the PA Disabled Veteran Outreach Program
9. PA Department of Transportation
10. PA Emergency Management Agency
11. PA Fish and Boat Commission
12. PA Game Commission
13. PA Historical & Museum Commission
14. PA Office of Vocational Rehabilitation
15. PA State Police
16. Governor's Action Team
17. Governor's Regional Offices (Northeast and Northwest)
18. U.S. Army Corps of Engineers
19. U.S. Department of Agriculture
20. U.S. Department of Commerce
21. U.S. Department of Transportation – Federal Highway Administration
22. U.S. Department of Transportation – Federal Transit Administration
23. U.S. Environmental Protection Agency
24. U.S. Fish & Wildlife Service

Surrounding County Planning Agencies (Notice Only)

1. Centre County Planning & Community Development Office
2. Centre Regional Planning Agency
3. Luzerne County Planning Commission
4. Lycoming County Planning Commission
5. Northeastern Pennsylvania Alliance
6. North Central Pennsylvania Regional Planning and Development Commission
7. Northern Tier Regional Planning and Development Commission
8. Southern Alleghenies Planning and Development Commission
9. Tri-County Regional Planning Commission

Private Citizens (Notice Only)

1. Eric Adams

2. Michelle Beiler, Bucknell University
3. Carol Coldren
4. Gloria Fultz, Independent Consultant
5. Dan Knorr, Bloomsburg University
6. Teena Kubasti, LIFE Geisinger
7. Bruce Phelps
8. Megan Wolleben, Bucknell University

Consulting Firms (Notice Only)

1. Michelle Brummer, Gannett Fleming
2. Gini Feigles-Karr, Dewberry
3. Brian Funkhouser, Michael Baker International
4. Robert Watts, McCormick Taylor, Inc.

Interested Persons from Meeting Survey (Notice Only)

See list of contacts interested in transit meeting activity notices also (from past surveys)

Community Libraries (Full Copy of Draft TIP Only)

1. Annie Halenbake Ross Library (Lock Haven)
2. Bloomsburg Public Library
3. Juniata County Library
4. Mifflin County Library
5. Thomas Beaver Free Library (Danville)
6. Degenstein Community Library (Sunbury)
7. Rudy Gelnett Memorial Library (Selinsgrove)
8. Public Library for Union County

Tribal Contacts (Full Copy of Draft Plan/TIP)

1. Absentee-Shawnee Tribe of Oklahoma
2. Cayuga Nation
3. Delaware Nation, Oklahoma
4. Delaware Tribe of Indians
5. Eastern Shawnee Tribe of Oklahoma
6. Oneida Indian Nation
7. Oneida Nation
8. Onondaga Nation
9. Seneca-Cayuga Nation
10. Seneca Nation of Indians
11. Shawnee Tribe
12. Tonawanda Band of Seneca
13. Tuscarora Nation

APPENDIX R.2

PUBLIC PARTICIPATION EVENT CHECKLISTS AND TOOLS

- Event Site Checklist
- Public Meeting Plan Template
- Public Meeting Comment Form Template



EVENT SITE CHECKLIST

Venue Information	
Location:	
Address:	
Available Dates:	
Confirmation needed by:	
Cost	
Size / # of rooms	
Seating capacity	
Any restrictions?	
Certificate of Insurance Required?	
Directions to Venue	
Contact Person:	
Phone:	
E-mail:	
Website:	

Event Logistics	
Table / Chairs needed	
Audio visual provisions	
Projector	
Projection screen	
Computer	
Internet access	
Sound system provisions	
Floor Plan with Electrical outlets	
Platform/stage	
Lighting	
Telephone / Conference call capability	
Food / beverage service	
Set-up	By facility operator? Provide meeting layout
	By event sponsor? Obtain photos of facility
Security	



PUBLIC MEETING PLAN

DATE: Select a date that works for all project team members. Tuesdays, Wednesdays, and Thursdays often work best as meeting dates.

FORMAT / TIME: Determine what type of meeting will be held. Often, evening meetings allow the public to attend the meeting after work hours.

- Will there be a Presentation? **Yes / No**
- Will there be an Open House/Plans Display? **Yes / No**

Example scheduling:

- Open House: 4:00 p.m. – 7:00 p.m.
- Presentation: 6:00 p.m. – 7:00 p.m.

LOCATION: Select a location that is close to the project area, accessible by public transportation, and is handicap accessible. The meeting venue should be a building that routinely provides community services (such as a Fire Hall, a Community Center, School, or Church).

PURPOSE: Determine the purpose of the meeting. Example meeting purposes include:

- Obtain feedback from the public
- Share the results of technical studies
- Provide information about a project or document

STAFFING (TBD): Determine the individuals from each participating agency that will be attending the meeting and list them here by agency.



PLANS DISPLAY AREA

If you choose to do a Plans Display, divide the content by station. See an example of Station listings below, along with suggested materials for each station. A staff member should be present at each station in order to answer questions and provide information. Staff should be located at Stations that align with their areas of expertise.

STATION 1: REGISTRATION

Staffing: List staff that would be present at this station.

Materials: **Welcome sign, General Sign-in Sheets, Comment Form, Public Meeting Informational Handout, Media Kits, Hard Copies of relevant documents, Comment Box**

Provide an explanation of the purpose of each station here.

STATION 2: PROJECT PURPOSE & NEED (if applicable)

Staffing: List staff that would be present at this station.

Displays: **Project Purpose and Needs Summary, Project Mapping**

Provide an explanation of the purpose of each station here.

STATION 3: TECHNICAL INFORMATION (traffic studies, environmental studies, etc.)

Staffing: List staff that would be present at this station.

Displays: **Two Environmental Features Maps – Natural / Socioeconomic Features, Environmental Effects Matrix, Section 106 Renderings and Mitigation information**

Provide an explanation of the purpose of each station here.

STATION 4: DOCUMENT DISPLAY/COMMENT AREA

Staffing: List staff that would be present at this station.

Displays: **Tables and Chairs, Pencils, General Comment Forms, Documents for review**

Provide an explanation of the purpose of each station here.



MEDIA COORDINATION:

- Will there be a press release? **Yes / No**
- When will the press release be distributed?

ADVERTISEMENT/NOTIFICATIONS:

- Does the Project / Document require 30-day comment period notice (in the form of an advertisement prior to the Meeting? **Yes / No?**
- How many times will the advertisement run in the newspaper(s)?
- Will notification letters be sent to the public / local stakeholders? **Yes / No**



Suggested questions

The following is a list of potential questions that can be used to customize the Comment Form to gather more targeted feedback. Comment categories include Plan / Planning Document, Limited English Proficiency, and Public Meeting.

Plan / Planning Document

- How helpful were the graphics in the Plan / Planning Document?

_____ Very helpful

_____ Somewhat Helpful

_____ Not very helpful

- The Plan / Planning Document includes an appropriate level of public outreach (Circle your response).

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Please explain:

Limited English Proficiency (LEP)

- Do you have a limited ability to read, speak, write, or understand English?

_____ Yes

_____ No

- What is your primary/preferred language? _____

- How do you receive information?

_____ Community Group Bulletin

_____ E-mail

_____ Word of Mouth

_____ Mail

_____ Newspaper

_____ Social Media

- How could SEDACOG improve services to LEP persons in the area?



Public Meeting

- How far from the meeting site do you live?
_____ Less than 5 miles
_____ 5 to 10 miles
_____ 10 to 20 miles
_____ Over 20 miles

- Was the meeting site reasonably accessible for you? Yes No

- Was the meeting time convenient for you? Yes No

- Did you clearly understand the purpose of the meeting? Yes No

- Was the meeting information presented in a clear manner? Yes No
If No, let us know how we can improve:

- The time allotted for the meeting was: Adequate Too Long Too Short

- Please describe any specific concerns with the information as presented at today's Public Meeting, the meeting site itself, or suggestions you have for improving future meetings:

*Thank you for taking the time to attend this public meeting!
Your input will be reviewed and used to improve our public participation efforts.*

APPENDIX R.3

OUTREACH STRATEGIES

Outreach Best Practices and Tools

SEDA-COG ensures all outreach strategies, communications and public involvement efforts comply with Title VI. SEDA-COG actively provides information regarding its Title VI obligations to the public using a variety of methods. Information, such as reference to the FTA circulars and the SEDA-COG Title VI and LEP programs and complaint procedures is available at the SEDA-COG office and on the website. Aligned with the above referenced communication tactics, SEDA-COG provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on SEDA-COG's website.
- c. Services for Limited-English Proficient persons. Upon advance notice, translators may be provided.

In addition, SEDA-COG's Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all socioeconomic groups in the public involvement process. When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, then these documents, meeting notices, flyers and agendas may be printed in an alternative language based on the known LEP population. Outreach tools that may further inform and engage underserved populations are shown in the table below.

Outreach Tool	Definition
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input.
Display Ads in Newspaper	Paid advertisement in the newspaper to alert readers about an upcoming event or action.
Displays at Transit Centers	Permanent or temporary displays at transit hubs and centers to reach a large number of system riders.
Legal Notice	Public posting or advertising in newspapers to announce a legal action or intent.
Social Media or Mobile Device Alerts	Real-time information to alert stakeholders and customers to important information or events.
On-Board Public Transit Postings	Pamphlets and posters provided within the transit vehicle that alert riders about transportation plans and programs that may be of interest or benefit to them.
Public Hearing	A meeting during which public testimony may be heard and formal action may be taken on any measure before the SEDA-COG Board.

Outreach Tool	Definition
Signs	Signs at community facilities, on buses, at stop locations, and at transit centers to reach people who use transit services.
Surveys (scientific and self-selected)	Surveying opinions and ideas to help SEDA-COG understand how to better serve the constituency.
Workshops/Open Houses/Town Halls	Types of meetings where staff and public interact and discuss various issues.

Outreach to Minority Populations

In addition, SEDA-COG may also employ one or more of the following techniques to involve minority persons:

- Research and catalog the kinds of forums and processes minority persons would prefer to discuss transportation planning issues.
- Meeting notices should include information on how to request translation assistance.
- Provide extensive use of visualization techniques including maps and graphics.
- Focus Groups provide opportunities to meet with affected communities or groups in smaller, focused settings in order to inform, educate or solicit input.
- Engage in an ongoing dialogue with groups and organizations that represent minority persons (religious leaders, civic activists, social service organizations, etc.). These local "intermediaries" are often trusted community leaders that minority groups may trust more than an outside organization. These intermediaries can also serve as a conduit for providing transportation-related information and facilitating feedback to the MPO.
- Establish a Public Participation Panel (to include minority persons) for: providing ongoing access to the regional planning and decision-making process, guiding various plan updates, reviewing timely issues, serving as a conduit for SEDA-COG information to organizations across the region, assisting the MPO in implementing public outreach strategies, and empowering citizens to get involved in regional planning.
- Seek opportunities to speak at meetings of groups involving minority/low income and traditionally underserved populations (e.g., "piggy-back" technique).
- Notify agencies that work with minority populations of agency activities.
- When multiple meetings are held for a single subject, efforts should be made to use a diversity of meeting locations in an effort to reach all segments of affected populations.
- Distribute press releases to minority media outlets to inform the public of meetings, open houses, and other SEDA-COG activities. For instance, many areas have one or more Spanish-language radio stations.
- Include language on all SEDA-COG press releases and other notices that SEDA-COG assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and that special accommodations can be arranged in advance.
- Vary the style of communication and feedback processes used. In some cultures, disagreeing with an authority is considered improper. To garner more open and

genuine feedback, less direct communication methods and a relaxed meeting environment have been helpful.

- Overcoming the “outsider” mentality is particularly challenging for outreach in areas with low numbers and concentrations of minorities. Extra efforts for inclusion of minorities may be necessary to gain trust and more than short-term interest.
- The staff or consultants used in outreach may require new skills, open-minded attitudes, and a more sensitive cultural understanding. Some degree of education, a record of experience with certain minority populations, or even diversity in the staff employed to conduct outreach activities may be needed to enable the best outreach results.
- Conduct periodic reviews of the PPP with the ever-changing demographic landscape in mind. Most agencies that are successful in outreach to minorities and other traditionally underserved populations cite flexibility (changing methods over time) and trial-and-error as their primary methods for success.

Outreach to Low-Income Persons

In addition, SEDA-COG may also employ one or more of the following techniques to involve low-income communities:

- Consult with SEDA-COG Housing Development Corporation on locations of low-income housing populations.
- Utilize Census data to map low-income populations. This includes zero-car households, as well as transit-dependent residents.
- Provide information and meeting notices at transit stops and stations, on transit vehicles, and at transportation hubs that connect various modes.
- Organize Focus Groups that target low-income residents that offer opportunities for low-income residents to provide input and feedback regarding transportation needs.
- Establish a Public Participation Panel (to include low-income representatives) for: providing ongoing access to the regional planning and decision-making process, guiding various plan updates, reviewing timely issues, serving as a conduit for SEDA-COG information to organizations across the region, assisting the MPO in implementing public outreach strategies, and empowering citizens to get involved in regional planning.
- Include information on website and meeting notices about how to request translation or other assistance.
- Provide extensive use of visualization techniques, including maps and graphics.
- Conduct an ongoing dialogue with groups that advocate for or represent low-income populations. This includes food banks, pantries and soup kitchens, Women, Infants and Children (WIC) program participants, students enrolled in USDA free lunch or summer food service programs, nutrition programs for the elderly, job training centers and welfare rights organizations.
- Notify agencies that work with low-income populations of agency activities.
- When multiple meetings are held for a single subject, efforts should be made to use a diversity of meeting locations in an effort to reach all segments of affected populations. This includes transit-friendly as well as walk-/bicycle-friendly locations.

- Seek opportunities to speak at meetings of groups involving low-income populations.
- Distribute press releases to media outlets that serve low-income populations to inform the public of meetings, open houses, and other SEDA-COG activities.
- Include language on all SEDA-COG press releases and other notices that SEDA-COG assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and that special accommodations can be arranged in advance.

Outreach to Limited English Proficiency (LEP) Persons

Traditional public involvement strategies, like public meetings and written media such as newspapers, email, and websites, may not be effective for LEP populations. The following approaches could be considered instead:

- Include information on website and meeting notices about how to request translation or other assistance.
- Research LEP community behavioral and traditional communication methods.
- Announcements in minority news media such as radio programs.
- Posting of flyers or notices at community organizations in identified areas with high LEP populations.
- Provide extensive use of visualization techniques, including maps and graphics. Consider whether the LEP group is literate in English, their own language, or neither.
- Identify which LEP groups will be most impacted.
- Contact religious or community organizations as a way to reach out to LEP communities.
- Use small meetings that may be less intimidating for those unfamiliar with the public involvement process.
- Use of interpreters, translation headsets, telephone translation services, and automated written translation services like Google Translate.
- Provide pre-emptive written translation of “vital documents” in the language(s) most commonly spoken by LEP individuals.

Outreach to Disabled Persons

According to the Pennsylvania Sunshine Act, the following wording must be included in a Public Meeting Notice:

The Meeting location is accessible to persons having disabilities. If you need accommodation due to a disability and want to attend the meeting, please call (XXX) XXX-XXXX at least 24 hours in advance so that arrangements can be made.

When selecting meeting venues, check to ensure that the following aspects are ADA compliant:

- Parking Spaces and curb ramps
- Doors and facility access
- Aisle way width
- Emergency egress

- Signage
- Seats, tables, and counters
- Restrooms
- Drinking fountains
- Room for wheelchair turnaround
- Lack of obstructions on walls or floors that may inhibit cane or wheelchair use

If the facility does not meet an ADA requirement, there are barrier removal strategies that can be used to comply with requirements. A comprehensive checklist of ADA requirements, along with recommended barrier removal strategies, is available at <http://www.ada.gov/raccheck.pdf>. SEDA-COG MPO staff could also coordinate with disability advocates and IT experts to make electronic materials and SEDA-COG website content easier to access.

Outreach to Zero-Car Households

For citizens that do not have access to personal vehicles for travel, consideration should be given to providing public notices and information to these populations through existing transit providers, as well as through bicycle and pedestrian organizations. The following approaches could be considered:

- Utilize Census data to map zero-car households, as well as transit services and infrastructure to sufficiently identify and catalog the locations of these populations.
- Provide information and meeting notices at transit stops and stations, on transit vehicles, and at transportation hubs that connect various modes.
- Contact organizations that serve bicyclists and pedestrians to reach these communities. This includes bicycle shops, local bicycle coalitions and clubs, transit providers, National Center for Bicycling and Walking, and the Association of Pedestrian and Bicycle Professionals.
- Target areas frequented by bicyclists and pedestrians, such as multi-use paths and trails, and pedestrian malls.
- Provide information through public service announcements (digital, print and broadcast), as well as through various news media outlets.

Outreach to Senior Persons

For citizens who have reached the age of retirement, or who are 65 years or older, outreach should target media outlets and organizations that serve these populations. These include the following:

- Utilize Census data to map senior citizens to sufficiently identify and catalog the locations of these populations.
- Contact organizations and advocacy groups that serve seniors and the elderly. This includes National Council on Aging, the Retirement Housing Foundation, AARP, Meals on Wheels, area agencies on aging, elderly legal services, Alliance for Retired Americans, and medical service providers.

- Post information and meeting notices on paratransit and social services vehicles, and at retirement communities.
- Target areas frequented by seniors, such as senior centers, libraries, recreation centers and shopping centers.
- Provide information through public service announcements (print and broadcast), as well as through various news media outlets.

Sources & Resources:

- Public Involvement Techniques for Transportation Decision-Making, USDOT, 6/15/2015:
www.fhwa.dot.gov/planning/public_involvement/publications/techniques/chapter01.cfm
- Public Outreach Strategies
<http://mpotransportationoutreachplanner.org/mpotop/strategies>
- Hernando County, FL Transit Operations 2017 Title VI Plan
<https://www.hernandocounty.us/home/showpublisheddocument/2218/636575200745530000>
- Spokane, WA Transit Authority
https://www.spokanetransit.com/files/content/2014_Title_VI_Plan_.pdf

APPENDIX R.4

LANGUAGE ASSISTANCE PLAN

Relationship of the Public Participation Plan (PPP) and Limited English Proficiency (LEP) Plan

The SEDA-COG MPO is responsible to take steps that ensure meaningful access to the services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP). In response to this responsibility, the SEDA-COG MPO has prepared a Limited English Proficiency (LEP) Plan that complies with the Federal guidance in addressing the following elements:

- a. Four Factor Analysis, as a framework for identifying LEP populations residing in the MPO region and determining the specific language services that are appropriate to provide. The four factors encompass the following:
 - 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
 - 2) The frequency with which LEP persons come into contact with the program.
 - 3) The nature and importance of the program, activity, or service provided by the program to people's lives.
 - 4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

- b. Language Assistance Plan (LAP), which applies the results of the Four Factor Analysis in developing and implementing language assistance services in the MPO's program and conducting outreach to LEP persons

The following LAP text is a direct excerpt from the larger SEDA-COG MPO Limited English Proficiency Plan. It is repeated here within the SEDA-COG MPO Public Participation Plan as a resource appendix, since the LAP is an action-specific plan that identifies resources and describes techniques available to the MPO for implementation in the public participation process.

Language Assistance Plan

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

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

Structure of the LAP

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

Primary Contact Points:

- Public Meetings
- Office Walk-In
- Telephone Calls
- Webpage
- Written Correspondence

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

Language Assistance Tools

Notices and Advertisements

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

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

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

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

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

Language Identification Card

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

“One Moment Please” Tool

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

Telephone-Based Interpretation Service

SEDA-COG maintains a contract with LinguaLinx Language Solutions for on-demand telephone-based interpretation services. LinguaLinx provides interpretation services for SEDA-COG by telephone, as requested, and pays all costs associated with the interpreter except for the per-minute usage fees charged to SEDA-COG. MPO staff take LinguaLinx procedures and language tip sheets to public meetings. With the increasing potential for interaction with LEP persons, the SEDA-COG MPO is prepared to utilize this service, and training is provided for the MPO staff persons who are anticipated to use it. 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, along with helpful tips for working with an over-the-phone interpreter are provided in **Appendix G**.

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

Translation Services for Written Material

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

The following are methods of providing written translation of documents:

- **Human-Translation Services**
Human translation (i.e., non-automated translation provided by human, 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 Translator (<https://www.bing.com/translator/>), provide on-demand translation among multiple languages, as well as an application programming interface (API) that may be integrated into existing webpages. SEDA-COG has embedded a language drop-down menu on the entire SEDA-COG website, including the MPO's pages. In keeping with best practices for making web-based translation services accessible, SEDA-COG has implemented code that shows icons for the top 10 language groups in the SEDA-COG MPO's service area.

Prior verification of the SEDA-COG MPO's webpages using automatic Spanish translation revealed that the outputs were generally acceptable and provided enough information to be

comprehended by Spanish-speaking individuals. Although some translational issues were identified, there were no substantive issues that would inhibit a speaker of Spanish from understanding the implied meaning of the text. If major website overhauls occur, the MPO may consider having the webpages again assessed for accuracy by a Spanish-speaking translator.

The “Four I” Approach

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

Public Meetings

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

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

Inform

The advertisement requirements for Public Meetings are prescriptive, with a legal advertisement in a “newspaper of general circulation” being the standard method for fulfilling the legal requirement for meeting advertisement. Press releases, website postings/announcements, and 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 following sample text will be used and adapted, as necessary:

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

Identify

Whether or not an LEP person contacts the MPO prior to a Public Meeting, the key identification point will be the Welcome/Sign-In station provided at the meeting venue. It is preferable that LEP persons “self-identify” themselves. The MPO will maintain a Language Identification Card and LEP Survey as standard material for the Welcome/Sign-In station.

Interact

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

Instruct

Training for the Public Meeting Contact Point will address the following:

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

Office Walk-In

An Office Walk-In involves an LEP person or group visiting the SEDA-COG MPO 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 weightier purpose—such as a discrimination complaint. Walk-in visitors are typically unannounced, but may have called ahead to arrange a meeting with a certain staff person.

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

Inform

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

Identify

It is preferable that LEP persons “self-identify” themselves. 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:

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

Telephone Call

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

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

Inform

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

SEDA-COG is able to request account usage breakdowns from LinguaLinx for the telephone interpretation service. The data can be used to monitor the types and frequency of languages interpreted on behalf of SEDA-COG departments. To date, the MPO staff have not needed to use the service. However, between 2018 and 2021, there were eight (8) telephone interpretation events (all for the Spanish language) completed on behalf of the SEDA-COG Administration and Weatherization departments.

Instruct

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

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

Webpage

The SEDA-COG MPO’s site address on the SEDA-COG website is:

www.seda-cog.org/departments/transportation/seda-cog-metropolitan-planning-organization. The site provides a platform for disseminating information about MPO meetings, plans and programs, upcoming activities, and receiving input through a Comment Page. Contact with the SEDA-COG MPO through its website portal is one of the more likely contact points used by LEP persons, for many of the same reasons that non-LEP persons seek out a webpage. Information and answers to questions may be handled on a self-serve basis, which is typically more comfortable for most persons who are savvy with the internet and computer technology. There is much information already on the SEDA-COG MPO webpage that may be readily accessed. Beyond this, for an LEP person, looking up a webpage is far less confrontational than telephone or in-person contact.

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

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

Inform

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

Identify

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 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 webpage 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 Translate tool enhancements and being able to track how much the tool is used by website visitors.

Written Correspondence

Contact through Written Communication includes both paper and 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	Website Translate tools 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 of every page, with SEDA-COG’s general email address (information@seda-cog.org) under the Contact Us page. In addition, most persons—whether LEP or not—understand the concept of written correspondence and its usefulness for accessing information, providing comments/feedback, and asking questions.

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

Identify

Identifying the language of a 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. These instances would also be recorded in a log to maintain a list of these interactions.

Interact

Some, but not all, of the correspondence from LEP persons will require a response, which would be the primary point of interaction. If the correspondence is simply providing feedback or comment on a plan or program, a response would be optional. Regardless, the response would be prepared in English and then translated into the language spoken by the LEP person. 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

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

LEP Employee Training Presentation

The Training Presentation has been prepared in Microsoft PowerPoint and includes two primary sections: 1) an overview of the LEP Plan, including the Four Factor Analysis; and 2) an explanation of the tools and resources appropriated in the LAP. The presentation includes a hyperlink to an online 25-minute video presentation developed by the U.S. Department of Justice for laypersons who are learning about language access and assistance. With the video and a time for questions, the full Training Presentation can be completed in 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 Appendices of this LEP Plan Document. Versions of these materials are maintained in electronic (PDF) and paper copy. Each staff member who participates in the *Training Presentation* will receive a paper copy of the *Manual*. Much of the material in the *Manual* is self-explanatory and may be used for a variety of training formats:

- On its own for brief “crash course”
- With the guidance of a trained staff person for “one-on-one” training
- Alongside a copy of the Training Presentation for “self-paced” training

Paper copies of the *Manual* will be maintained 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

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

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

LEP Plan Self-Assessment Checklist

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

LEP Interaction Tracking Form

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

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

The *Record* and *Annual Report* are intended to inform certain questions asked in the Self-Assessment.

Suggested LEP Plan Performance Measures

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

Sources

Federal Government's Renewed Commitment to Language Access Obligations under Executive Order 13166.

http://www.lep.gov/13166/AG_021711_EO_13166_Memo_to_Agencies_with_Supplement.pdf

Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA Circular 4702.1B)
Federal Transit Administration.

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Policy Guidance Concerning Recipients' Responsibilities to LEP Persons, U.S. Department of Transportation.

<https://www.govinfo.gov/content/pkg/FR-2005-12-14/html/05-23972.htm>

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

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

APPENDIX R.5

EVALUATION PROCESSES FOR THE PUBLIC PARTICIPATION PLAN

Public Involvement Activity Portfolio

The Portfolio provides a repository of material that documents its public involvement and participation activities, as a record of the PPP's implementation. The actual items collected for the portfolio will reflect the PPP requirements of the planning activity completed. The following is a listing of candidate items that may be collected, as appropriate:

- Event Site Checklist
- Outreach Activity Plan (e.g., Public Meeting Plan)
- Advertisement of public comment period (if applicable)
- Record of webpage postings (date posted, URL, date removed, # of unique hits)
- Review and evaluation of EJ and other Traditionally Underserved Population data, for the purposes of targeted outreach (if applicable)
- Advertisement of the activity
 - Proof copy for legal advertisement
 - Press Release
 - Webpage announcements
 - Email & electronic notifications
 - Distribution list
- Copies of meeting materials
 - Handouts (information sheets, graphics, etc.)
 - Presentation materials (PowerPoint, audio/video)
 - Transcript of presentations
 - Copies/photos of boards, displays
 - Sample comment form
- Photos/video of meeting proceedings
- Meeting summary
- List of attendees (Sign-In Sheet)
- Completed comment forms (scan to PDF)
- Comments received from other sources (webpage, email, mail, and paper copy reviews)
- Compilation and analysis of comments received
- Responses to comments received
- Media coverage of the activity (newspaper, webpage, blog, TV transcript)

The Portfolio would be most efficiently maintained in an all-electronic format, with items scanned or printed to PDF or other widely used software formats.

The items may be organized under the primary planning activity to which they contribute (e.g., Long-Range Transportation Plan, TIP Update, etc.).

Plan or Planning Activity: _____
 Reviewed by: _____

Category	Element	Consistent with PPP	Notes
Advertisements & Notifications	Placed a legal advertisement of the public comment period and public meetings in <i>The Daily Item</i> newspaper: <ul style="list-style-type: none"> o Contained the required information o Placed appropriately in advance of the public comment period ending date and public meeting(s) 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Press releases made regarding the public comment period and public meetings: <ul style="list-style-type: none"> o Consistent with the legal advertisement o Placed appropriately in advance of the public comment period ending date and public meeting(s) 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Interested Parties notified via email at the proper time	<input type="checkbox"/> <input type="checkbox"/> n/a	
	Web notification provided on the SEDA-COG webpage at the appropriate time	<input type="checkbox"/> <input type="checkbox"/> n/a	
Public Comment Period	Primary Public Comment Period required? Provided the primary Public Comment Period: <ul style="list-style-type: none"> o With the minimum or longer time period 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Additional Public Comment period required? Provided the additional Public Comment Period: <ul style="list-style-type: none"> o With the minimum or longer time period 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
Document Availability	Materials posted on the webpage in an accessible format <ul style="list-style-type: none"> o For the primary Public Comment Period o For any additional Public Comment Period 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Paper copy materials made available consistent with the legal advertisement: <ul style="list-style-type: none"> o At the specified locations and times o For the primary Public Comment Period o For any additional Public Comment Period 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
Public Meetings	Conducted the minimum number of public meetings: <ul style="list-style-type: none"> o At an accessible location o Consistent with the date, time, location specified in the legal advertisement 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
Comments	Comments solicited and received via: <ul style="list-style-type: none"> o Comment forms distributed at the public meeting(s) o Webpage comment portal or email (electronic) o Postal mail or hand-delivered (written) 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Comments compiled and summarized <ul style="list-style-type: none"> o Incorporated into FINAL plan document 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
	Comment responses prepared <ul style="list-style-type: none"> o Incorporated into FINAL plan document o Posted on the SEDA-COG webpage (or project-specific web portal) within the required timeframe 	<input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a <input type="checkbox"/> <input type="checkbox"/> n/a	
Agency Coordination	FHWA & FTA provided with opportunity to comment	<input type="checkbox"/> <input type="checkbox"/> n/a	
	Presentation made at an Agency Coordination Meeting	<input type="checkbox"/> <input type="checkbox"/> n/a	
Adoption	Plan, amendment, update, etc., adopted at an advertised MPO meeting	<input type="checkbox"/> <input type="checkbox"/> n/a	
Documentation	Activity Portfolio contains relevant material to document the public participation process	<input type="checkbox"/> <input type="checkbox"/> n/a	

Public Participation Plan (PPP) Document Evaluation

Reviewed by: _____

Date: _____

Need for Public Participation Plan Update	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Has new Federal or State legislation been enacted or new guidance, regulation, or Executive Orders been issued that add, remove, or modify the public participation requirements for metropolitan transportation planning?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Has new decennial Census data (100% data) become available, and are the necessary tabulations available for comprehensively refreshing the demographic data for EJ and Traditionally Underserved Populations? OR is the data used in the current PPP more than 5 years older than the currently available Census survey data (American Community Survey or equivalent)?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does a pending update or revision to another primary planning document (Long-Range Transportation Plan, TIP, UPWP, etc.) or another MPO agreement (TIP Amendment MOU) require the PPP to be updated for the sake of plan consistency?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Has a significant change occurred in the MPO geography or governance that impacts the implementation and/or effectiveness of the current PPP processes?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Has FHWA or FTA issued a “corrective action” to the MPO, identifying a deficiency in the PPP?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Have the two previous triennial reviews identified provisions, stipulations, or commitments in the current PPP that are consistently not achieved or are onerous to implement consistently?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Have the past two triennial reviews identified substantial successful public involvement processes that are consistently implemented but not included in the current PPP?
<input type="checkbox"/> Yes <input type="checkbox"/> No	Have surveys or measures of “satisfaction” indicated consistent dissatisfaction with the plan itself or any of the plan elements, strategies of public involvement, performance measures, or the public involvement materials (visuals, graphics, organization of materials)?
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Is an update of the PPP warranted?</p> <p>If an update is warranted, what degree of update will be pursued?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Full update / plan replacement (substantial changes to all parts of the PPP) <input type="checkbox"/> Selective update (substantial changes to certain parts of the PPP) <input type="checkbox"/> Technical update (update of supporting demographics data/mapping, addition of checklists, templates, and other materials used to implement the existing PPP, etc.) <input type="checkbox"/> Minor administrative revisions (non-substantive corrections, clarifications, and changes that have no impact on the PPP content or processes)

Public Participation Plan (PPP) Document Evaluation

Reviewed by: _____

Date: _____

Open Ended Review

To make the current PPP more effective, easier to implement, more understandable, or better organized:

- What elements of the current PPP require refinement, clarification, or revision?

- What materials, resources, tools information, or other elements could be added?

Additional comments:

APPENDIX F
Limited English Proficiency Plan



SEDA-COG MPO Limited English Proficiency Plan

Prepared by:

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REVISED: April 1, 2022



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Background

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

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

Four Factor Analysis

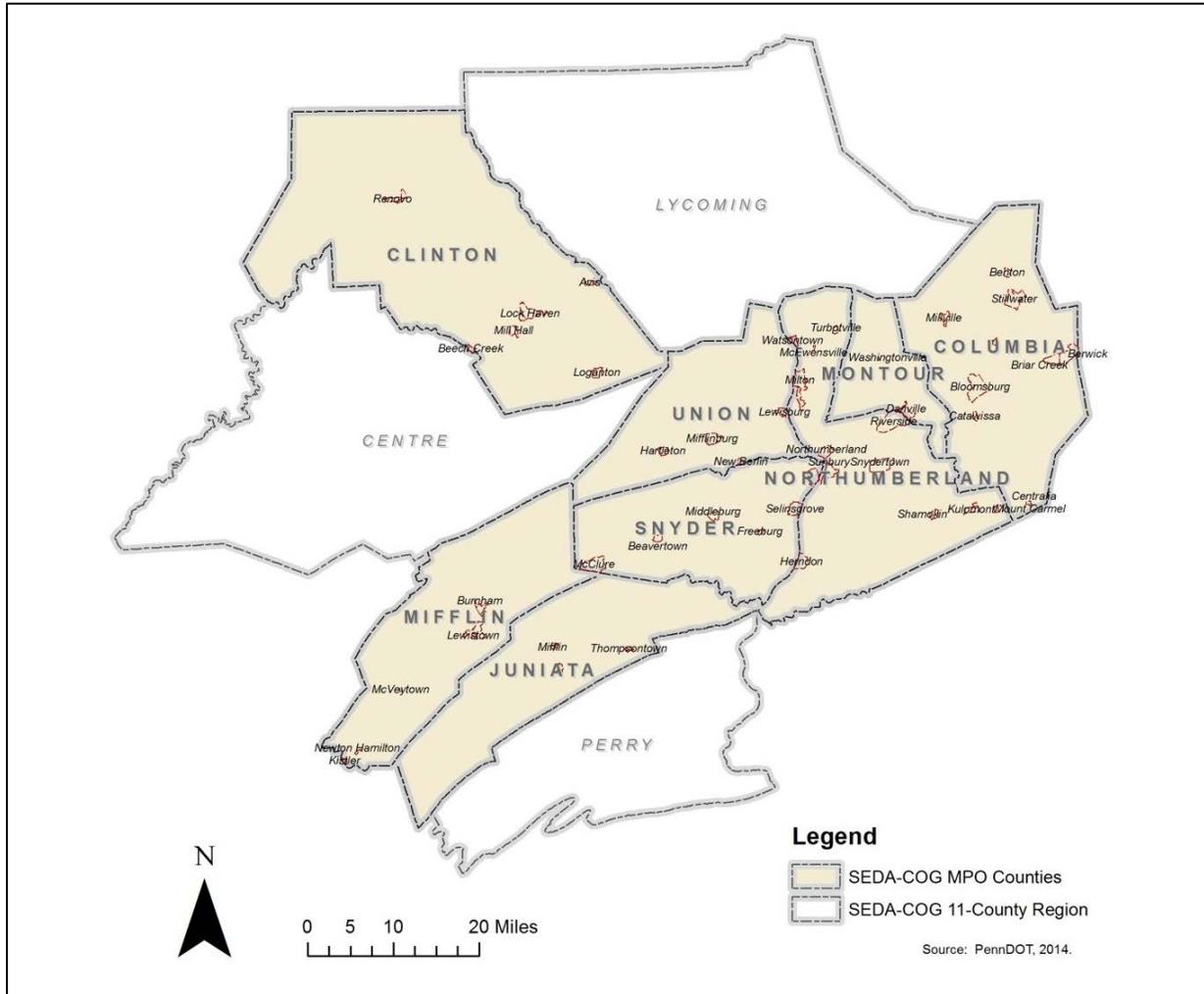
The Four Factor Analysis is one of the primary compliance processes established in the Department of Justice’s LEP Guidance. The Analysis provides a framework for agencies to use in identifying the LEP populations in their service area and developing a cost-effective and meaningful plan for providing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

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a recipient's program, activity, or service.
2. The frequency with which LEP individuals come in contact with the program, activity, or service provided.
3. The nature and importance of the program, activity, or service provided by the recipient to LEP people’s lives.
4. The resources available to the recipient and costs associated with providing meaningful access to LEP persons.

Factor 1 – Number or Proportion of LEP Persons Encountered

Factor 1 evaluates the number of LEP persons served or the concentration of LEP persons in the service area population. In the case of the SEDA-COG MPO, the service area population is the total population within the region served by the MPO, including the following eight (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 2015-2019 American Community Survey (ACS) data. The data for “Language Spoken at Home for the Population 5 Years and Over” (Table C16001) was compiled and mapped at the tract level. Individuals are characterized as speaking English “very well” or “less than very well.” For this analysis, an individual who speaks English less than very well is considered an LEP person.

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



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

Total LEP Population in the SEDA-COG MPO Region

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

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

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

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

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

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

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

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

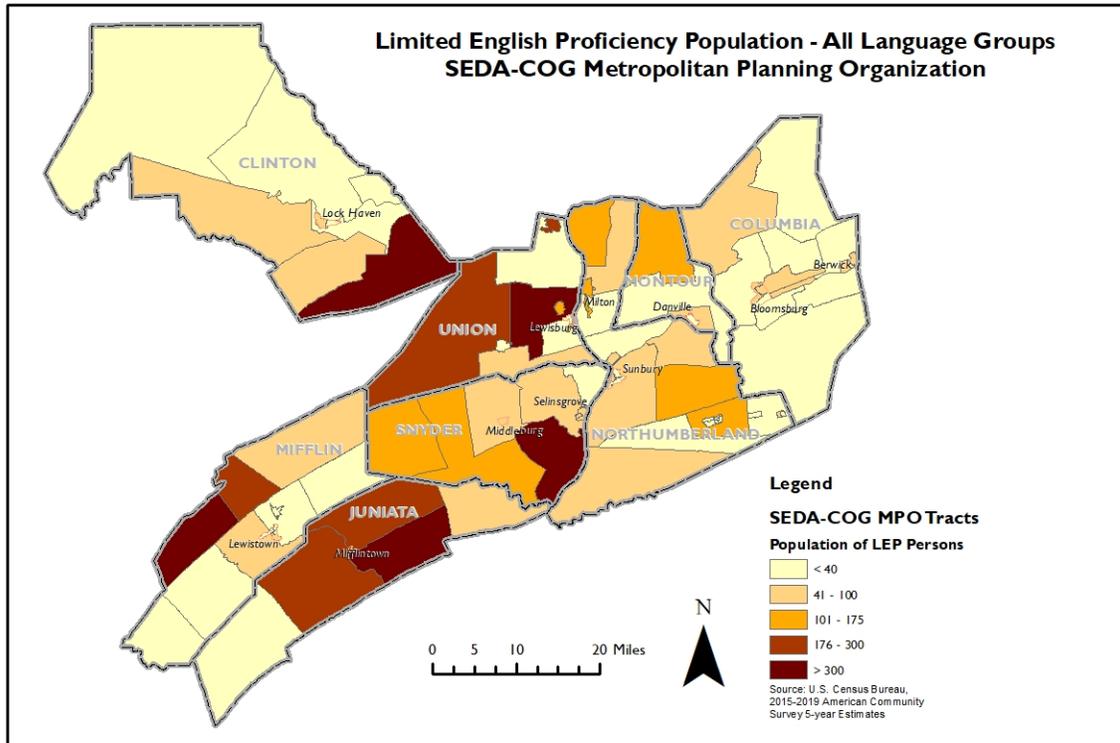


Figure 3. SEDA-COG MPO Concentration of Persons with Limited English Proficiency

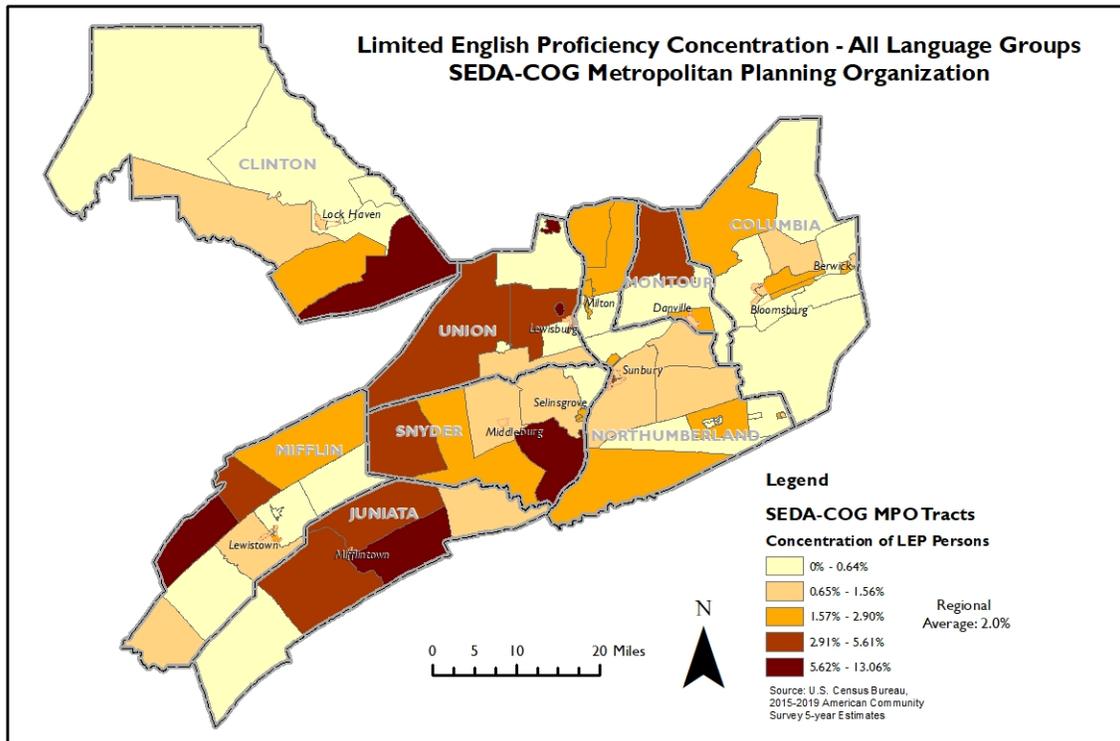




Table 3. LEP Persons for All Language Groups by County

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

Yellow Highlight indicates highest three counties for total LEP population.

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

Largest LEP Language Groups in the SEDA-COG MPO Region

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

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

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

Notes:

¹Presumed to be predominantly speakers of "Pennsylvania Dutch."

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



Geographic Distribution of LEP Populations

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

German or other West Germanic Language Group

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

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

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

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

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

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



Spanish Language Group

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

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

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

Table 6. Spanish Language Group LEP Persons by County

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

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

Figure 4. German or other West Germanic LEP Population by Census Tract

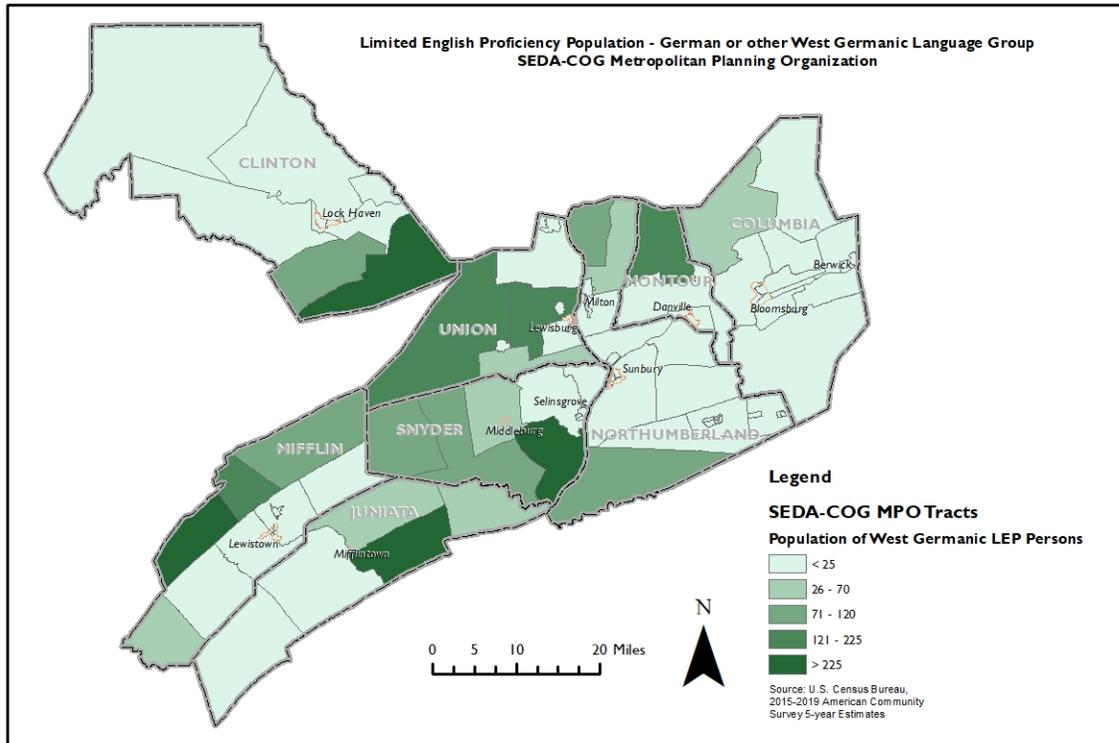


Figure 5. German or other West Germanic LEP Concentration by Census Tract

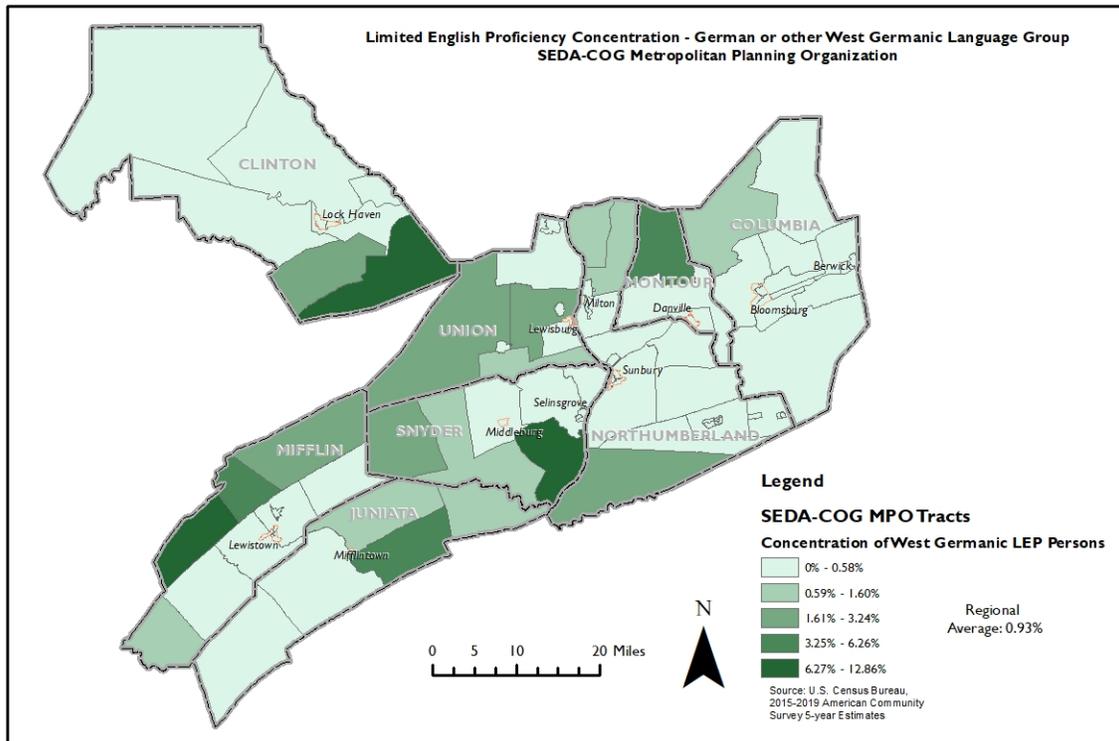


Figure 6. Spanish LEP Population by Census Tract

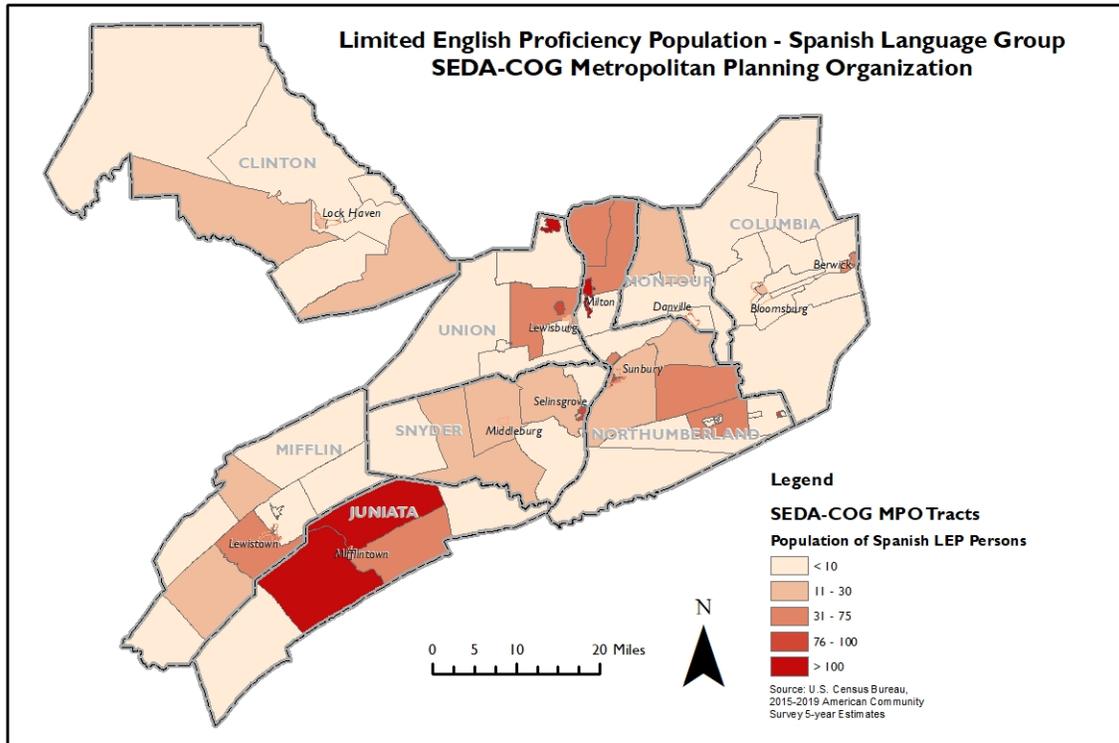
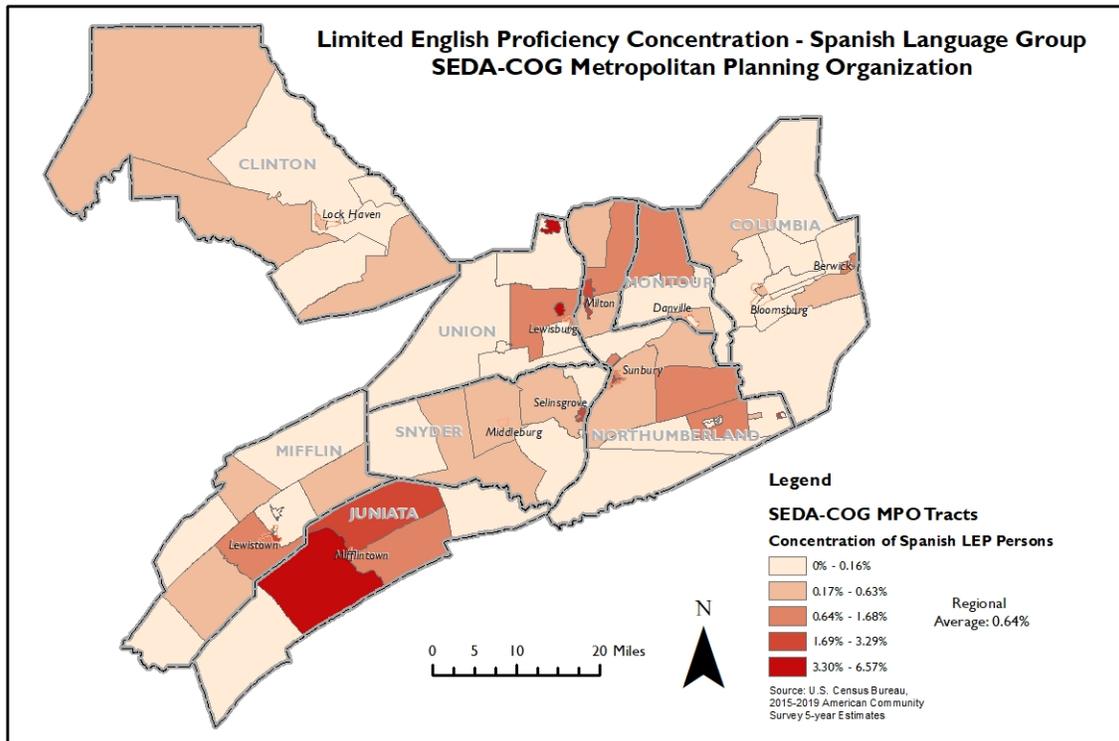


Figure 7. Spanish LEP Concentration by Census Tract





Safe Harbor Provision

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

Safe Harbor Triggers

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

Considering the SEDA-COG MPO region as a whole (i.e., the “service area”), the total LEP populations for both German or other West Germanic and Spanish language groups exceed the 1,000-person threshold, even though the regional concentrations of both populations fall below the 5% threshold (see **Table 4**). However, when the total LEP populations are viewed in light of eligibility or the likelihood of being affected or encountered, there are indications that the modified West Germanic LEP population would not trigger the Safe Harbor Provision. 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 triggered³ in the SEDA-COG MPO region for the Spanish language group alone.

Safe Harbor Translation Expectations

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

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

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

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



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

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

Factor 2 – Frequency of Contact with LEP Persons

The SEDA-COG MPO provides transportation planning and programming services for the 8-county area and serves as the regional forum for transportation decision-making. Decisions made by the MPO have the potential to affect all residents of the service area, and as a result, LEP persons may also be impacted by the decisions, services, and programs instituted by the MPO. Public input is routinely sought in the development and advancement of primary planning processes (e.g., Long-Range Transportation Plan, Transportation Improvement Program, Public Participation Plan) and other plans, programs, and initiatives. Public comments are solicited from any interested party.

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

German or other West Germanic languages (PA Dutch) is the most common language spoken by LEP individuals in the SEDA-COG MPO region. 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.

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

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



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

The lessons learned through these experiences 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 recommended tools and training its staff for recognizing LEP persons, identifying their language, and serving the needs of LEP persons.

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

Factor 3 – Nature & Importance of the Program

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

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

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



Factor 4 – Resources & Costs of Language Assistance Services

The SEDA-COG MPO is a small planning organization with limited capital resources available to spend on LEP services. The organization has three (3) 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 MPO dedicates resources for performing LEP analysis and maintaining language-related resources (surveys, complaint logs, taglines, website document translation request form, mapping, etc.). In addition, SEDA-COG contracts with LinguaLinx Language Solutions for on-demand phone-based interpretation services. LinguaLinx provides interpretation services for SEDA-COG by telephone, as requested, and pays all costs associated with the interpreter except for the per-minute usage fees charged to SEDA-COG. MPO staff take LinguaLinx procedures and language tip sheets to public meetings. As additional resources become available or new needs are identified, the MPO will assess its ability to expand its existing language assistance efforts.

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



Language Assistance Plan

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

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

Structure of the LAP

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

Primary Contact Points:

- Public Meetings
- Office Walk-In
- Telephone Calls
- Webpage
- Written Correspondence

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



Language Assistance Tools

Notices and Advertisements

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

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

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

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

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

Language Identification Card

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

“One Moment Please” Tool

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



Telephone-Based Interpretation Service

SEDA-COG maintains a contract with LinguaLinx Language Solutions for on-demand telephone-based interpretation services. LinguaLinx provides interpretation services for SEDA-COG by telephone, as requested, and pays all costs associated with the interpreter except for the per-minute usage fees charged to SEDA-COG. MPO staff take LinguaLinx procedures and language tip sheets to public meetings. With the increasing potential for interaction with LEP persons, the SEDA-COG MPO is prepared to utilize this service, and training is provided for the MPO staff persons who are anticipated to use it. 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, along with helpful tips for working with an over-the-phone interpreter are provided in **Appendix G**.

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

Translation Services for Written Material

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

The following are methods of providing written translation of documents:

- **Human-Translation Services**
Human translation (i.e., non-automated translation provided by human, 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 Translator (<https://www.bing.com/translator/>), provide on-demand translation among multiple languages, as well as an application programming interface (API) that may be integrated into existing webpages. SEDA-COG has embedded a language drop-down menu on the entire SEDA-COG website, including the MPO's pages. In keeping with best practices for



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

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

The “Four I” Approach

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

Public Meetings

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

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



Inform

The advertisement requirements for Public Meetings are prescriptive, with a legal advertisement in a “newspaper of general circulation” being the standard method for fulfilling the legal requirement for meeting advertisement. Press releases, website postings/announcements, and 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 following sample text will be used and adapted, as necessary:

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

Identify

Whether or not an LEP person contacts the MPO prior to a Public Meeting, the key identification point will be the Welcome/Sign-In station provided at the meeting venue. It is preferable that LEP persons “self-identify” themselves. The MPO will maintain a Language Identification Card and LEP Survey as standard material for the Welcome/Sign-In station.

Interact

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

Instruct

Training for the Public Meeting Contact Point will address the following:

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



Office Walk-In

An Office Walk-In involves an LEP person or group visiting the SEDA-COG MPO 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 weightier purpose—such as a discrimination complaint. Walk-in visitors are typically unannounced, but may have called ahead to arrange a meeting with a certain staff person.

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

Inform

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

Identify

It is preferable that LEP persons “self-identify” themselves. 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:

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

Telephone Call

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

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



Inform

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

SEDA-COG is able to request account usage breakdowns from LinguaLinx for the telephone interpretation service. The data can be used to monitor the types and frequency of languages interpreted on behalf of SEDA-COG departments. To date, the MPO staff have not needed to use the service. However, between 2018 and 2021, there were eight (8) telephone interpretation events (all for the Spanish language) completed on behalf of the SEDA-COG Administration and Weatherization departments.

Instruct

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

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

Webpage

The SEDA-COG MPO's site address on the SEDA-COG website is:

www.seda-cog.org/departments/transportation/seda-cog-metropolitan-planning-organization. The site provides a platform for disseminating information about MPO meetings, plans and programs, upcoming activities, and receiving input through a Comment Page. Contact with the SEDA-COG MPO through its



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

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

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

Inform

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

Identify

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 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 webpage 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 Translate tool enhancements and being able to track how much the tool is used by website visitors.

Written Correspondence

Contact through Written Communication includes both paper and 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

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



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

Inform

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

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

Identify

Identifying the language of a 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. These instances would also be recorded in a log to maintain a list of these interactions.

Interact

Some, but not all, of the correspondence from LEP persons will require a response, which would be the primary point of interaction. If the correspondence is simply providing feedback or comment on a plan or program, a response would be optional. Regardless, the response would be prepared in English and then translated into the language spoken by the LEP person. 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

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

LEP Employee Training Presentation

The Training Presentation has been prepared in Microsoft PowerPoint and includes two primary sections: 1) an overview of the LEP Plan, including the Four Factor Analysis; and 2) an explanation of the tools and resources appropriated in the LAP. The presentation includes a hyperlink to an online 25-minute video presentation developed by the U.S. Department of Justice for laypersons who are learning about language access and assistance. With the video and a time for questions, the full Training Presentation can be completed in 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 Appendices of this LEP Plan Document. Versions of these materials are maintained in electronic (PDF) and paper copy. Each staff member who participates in the *Training Presentation* will receive a paper copy of the *Manual*. Much of the material in the *Manual* is self-explanatory and may be used for a variety of training formats:

- On its own for brief “crash course”
- With the guidance of a trained staff person for “one-on-one” training
- Alongside a copy of the Training Presentation for “self-paced” training

Paper copies of the *Manual* will be maintained 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

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

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

LEP Plan Self-Assessment Checklist

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

LEP Interaction Tracking Form

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

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

The *Record* and *Annual Report* are intended to inform certain questions asked in the Self-Assessment.

Suggested LEP Plan Performance Measures

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



Sources

Federal Government's Renewed Commitment to Language Access Obligations under Executive Order 13166.

http://www.lep.gov/13166/AG_021711_EO_13166_Memo_to_Agencies_with_Supplement.pdf

Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA Circular 4702.1B)
Federal Transit Administration.

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Policy Guidance Concerning Recipients' Responsibilities to LEP Persons, U.S. Department of Transportation.

<https://www.govinfo.gov/content/pkg/FR-2005-12-14/html/05-23972.htm>

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

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



Appendices

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



Appendix A

**Notification of Language Services
(English and Spanish Versions)**



Notice of Language Services

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

In-Person

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

By Phone

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

By Written Correspondence

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

Document Translations Available

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



Aviso de servicios lingüísticos

La MPO de SEDA-COG brinda servicios de interpretación de idiomas y traducción de documentos a pedido. Si su idioma preferido no es el inglés, permítanos descubrir su idioma preferido y conversar o corresponder con usted en ese idioma. A continuación se describe lo que puede esperar cuando interactúa con nuestro personal.

En persona

Si asiste a una reunión o visita la oficina de SEDA-COG MPO en persona, acérquese a la estación de bienvenida/registro o al mostrador de recepción e indique su idioma preferido. Si la persona no puede entender su solicitud, le mostrará una tarjeta de identificación de idioma. Señale su idioma preferido. La persona que lo ayude le pedirá que espere un momento mientras se comunica con un servicio de interpretación por teléfono para ayudar en la conversación. La interpretación está disponible para muchos idiomas diferentes y se proporciona de forma gratuita. Tenga paciencia mientras ponemos al intérprete en línea.

Por teléfono

Si desea llamar a SEDA-COG MPO, llame al número de la oficina principal al (570) 524-4491 y solicite su idioma preferido. Si la persona que contesta su llamada no puede entender su solicitud, le pedirá que espere un momento mientras se comunica con un servicio de interpretación telefónica para ayudar en la conversación. La interpretación está disponible para muchos idiomas diferentes y se proporciona de forma gratuita. Tenga paciencia mientras descubrimos su idioma y ponemos al intérprete en línea.

Por correspondencia escrita

Cuando escriba correspondencia a SEDA-COG MPO, escriba en su idioma preferido. Dirija la correspondencia en papel a SEDA-COG MPO, 201 Furnace Road, Lewisburg, PA 17837. Dirija la correspondencia por correo electrónico a sherman@seda-cog.org. La MPO también proporciona un Portal de comentarios en su sitio web en <https://sedacog.org/departments/transportation/transportation-comments>. Traduiremos su correspondencia y luego le daremos una respuesta (si es factible y apropiado) en su idioma preferido además de en inglés. Espere hasta 45 días para recibir la respuesta escrita y traducida en su idioma.

Traducciones de documentos disponibles

La MPO de SEDA-COG se compromete a mantener las traducciones al español de los documentos vitales, que abarcan aquellos que explican cómo acceder a los servicios de la MPO (incluidos los servicios de asistencia lingüística), notificación de derechos y formularios de quejas. Estos documentos traducidos están disponibles en copia impresa a través de la oficina de SEDA-COG MPO, y también están disponibles en línea en el sitio web de MPO: <https://seda-cog.org/departments/transportation>.



Appendix B

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



Title VI Notice to Beneficiaries
(English)

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

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

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

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

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

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



Title VI Notice to Beneficiaries
(Spanish)

SEDA-COG ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (MPO)
TÍTULO VI AVISO AL PÚBLICO

La Organización de Planificación Metropolitana (MPO) de SEDA-COG por la presente notifica que es política de la MPO de SEDA-COG asegurar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, Orden Ejecutiva 12898 sobre Justicia Ambiental, y estatutos y reglamentos relacionados en todos los programas y actividades. El Título VI exige que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de la participación, se le nieguen los beneficios o sea objeto de discriminación en cualquier programa o actividad administrada por el SEDA-COG MPO.

Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria bajo el Título VI tiene derecho a presentar una queja formal ante la MPO de SEDA-COG. Cualquier queja de este tipo debe ser por escrito y presentada ante el Oficial de Cumplimiento del Título VI de SEDA-COG MPO dentro de los ciento ochenta (180) días posteriores a la fecha del presunto incidente discriminatorio. Se puede obtener un Formulario de Queja por Discriminación del Título VI de SEDA-COG MPO llamando al 570-524-4491 o enlazando al [Formulario de Queja por Discriminación](#) de la MPO.

Este aviso se publica en la oficina de SEDA-COG (la dirección física se muestra a continuación) y en el sitio web de SEDA-COG. Para obtener más información sobre el Programa Título VI de SEDA-COG MPO o los procedimientos para presentar una queja, comuníquese con:

Steve Herman, AICP
Oficial de Cumplimiento del Título VI
SEDA-COG MPO
201 Furnace Road
Lewisburg, PA 17837
(570) 524-4491
sherman@seda-cog.org
www.seda-cog.org

Si necesita información en otro idioma, llame al 570-524-4491 (TTY: 711) para obtener información sobre los servicios de asistencia lingüística.



Appendix C

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



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

Name	Phone	Name of Person(s) That Discriminated Against You
Address (Street No., P.O. Box, etc.)		Location and Position of Person (If Known)
City, State, Zip		City, State, Zip
Discrimination Because of: <input type="checkbox"/> Race/Color* <input type="checkbox"/> Sex <input type="checkbox"/> Disability** <input type="checkbox"/> Age <input type="checkbox"/> National Origin* <input type="checkbox"/> Retaliation <input type="checkbox"/> Religion		Date(s) of Alleged Incident(s)
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also, attach any written material pertaining to your case.		
Signature		Date

Please submit this form to one of the following agencies:

<p>SEDA-COG Metropolitan Planning Organization</p> <p><i>Title VI Compliance Officer</i></p> <p>201 Furnace Road Lewisburg, PA 17837 Phone: (570) 524-4491</p> <p>Email: information@seda-cog.org</p>	<p>Pennsylvania Department of Transportation</p> <p><i>Bureau of Equal Opportunity</i></p> <p>P.O. Box 3251 Harrisburg, PA 17105-3251 Phone: (800) 468-4201</p> <p>Email: penndoteoreports@pa.gov</p>	<p>Federal Highway Administration</p> <p><i>Equal Opportunity Specialist</i></p> <p>Pennsylvania Division Office 228 Walnut Street, Room 508 Harrisburg, PA 17101-1720</p> <p>Phone: (717) 221-3705</p>	<p>U.S. Department of Justice</p> <p><i>Office of Justice Programs</i></p> <p>Office for Civil Rights 810 7th Street, NW Washington, DC 20531</p> <p>Phone: (202) 307-0690 Phone (TDD): 202-307-2027</p>
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*indicates is specific to Title VI of the Civil Rights Act of 1964. **indicates is specific to Americans with Disabilities Act of 1990.



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

Nombre	Teléfono	Nombre de la(s) persona(s) que lo discriminaron
Dirección (Número de calle, apartado de correos, etc.)		Ubicación y posición de la persona (si se conoce)
Ciudad, Estado, Código Postal		Ciudad, Estado, Código Postal
Discriminación por: <input type="checkbox"/> Raza/Color* <input type="checkbox"/> Sexo <input type="checkbox"/> Discapacidad ** <input type="checkbox"/> Años <input type="checkbox"/> Origen nacional* <input type="checkbox"/> Represalias <input type="checkbox"/> Religión		Fecha(s) del incidente(s) alegado(s)
Explique lo más breve y claramente posible lo que sucedió y cómo fue discriminado. Indique quién estuvo involucrado. Asegúrese de incluir cómo otras personas fueron tratadas de manera diferente a usted. Además, adjunte cualquier material escrito relacionado con su caso.		
Firma		Fecha

Envíe este formulario a una de las siguientes agencias:

<p align="center">SEDA-COG Organización de Planificación Metropolitana</p> <p align="center"><i>Oficial de Cumplimiento del Título VI</i></p> <p align="center">201 Furnace Road Lewisburg, PA 17837 Phone: (570) 524-4491</p> <p align="center">Correo electrónico: information@seda-cog.org</p>	<p align="center">Departamento de Transporte de Pensilvania</p> <p align="center"><i>Oficina de Igualdad de Oportunidades</i></p> <p align="center">P.O. Box 3251 Harrisburg, PA 17105-3251 Phone: (800) 468-4201</p> <p align="center">Correo electrónico: penndoteoreports@pa.gov</p>	<p align="center">Administración Federal de Carreteras</p> <p align="center"><i>Especialista en Igualdad de Oportunidades</i></p> <p align="center">Pennsylvania Division Office 228 Walnut Street, Room 508 Harrisburg, PA 17101-1720</p> <p align="center">Teléfono: (717) 221-3705</p>	<p align="center">Departamento de Justicia de EE. UU.</p> <p align="center"><i>Programas de la Oficina de Justicia</i></p> <p align="center">Office for Civil Rights 810 7th Street, NW Washington, DC 20531</p> <p align="center">Teléfono: (202) 307-0690 Teléfono (TDD): 202-307-2027</p>
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*indica es específico al Título VI de la Ley de Derechos Civiles de 1964 **indica que es específico de la Ley de Estadounidenses con Discapacidades de 1990.



Appendix D

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



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

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

- The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.
1. Complaints shall be in writing and signed by the Complainant or the Complainant's representative. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by phone can be reduced to writing as an accommodation upon request and provided to the complainant for confirmation or revision and signature before processing. Complainants can also use the MPO's Title VI Complaint Form available on the SEDA-COG website.
 2. Generally, the written complaint should include the following information:
 - a. Name, address, and telephone number of the Complainant.
 - b. Basis of the complaint (e.g., race, color, national origin, sex, age, disability or retaliation).
 - c. A detailed description of the circumstances of the incident that lead the Complainant to believe discrimination occurred.
 - d. Name, title, and address of the person(s) who discriminated against the Complainant.
 - e. Name, address, and phone number of any person(s) who may have knowledge of the alleged incident or are perceived as parties in the complained-of-incident.
 - f. Date or dates on which the alleged discrimination occurred.
 - g. Other agencies where the complaint was filed.
 3. If the MPO receives a complaint, the Title VI Compliance Officer will acknowledge receipt of the complaint by notifying the Complainant within 10 business days and transmitting the complaint to the proper federal or state agency (e.g., Federal Highway Administration, Federal Transit Administration, or PennDOT) for investigation and disposition pursuant to that agency's Title VI complaint procedures.



4. Although these procedures do not preclude the MPO from attempting to informally resolve complaints, the decision to resolve informally always rests with the Complainant, who may withdraw from the informal process at any time.
5. These procedures apply to all external complaints about discrimination on the basis of race, color, national origin (including limited English proficiency), age, sex, religious creed, or disability related to any program or activity administered by the MPO and/or its subrecipients, consultants, and contractors, filed under Title VI (including its Disadvantaged Business Enterprise and Equal Employment Opportunity components), as well as other related laws including, but not limited to, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disability Act of 1990.
6. The MPO Title VI Compliance Officer will maintain a log of all complaints received by the MPO.

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

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

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

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

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

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

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

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



Title VI Complaint Procedures (Spanish)

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

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

- La fecha del presunto acto de discriminación; o
 - La fecha en que la(s) persona(s) se dieron cuenta de la supuesta discriminación; o
 - Cuando ha habido un curso continuo de conducta, la fecha en que se interrumpió esa conducta o la última instancia de la conducta.
1. Las quejas deberán ser por escrito y firmadas por el Demandante o el representante del Demandante. Las quejas recibidas por fax o correo electrónico serán reconocidas y procesadas. Las denuncias recibidas por teléfono pueden reducirse a escribir como una adaptación a pedido y entregarse al denunciante para su confirmación o revisión y firma antes del procesamiento. Los denunciantes también pueden usar el formulario de denuncia del Título VI de la MPO disponible en el sitio web de SEDA-COG.
 2. En general, la queja por escrito debe incluir la siguiente información:
 - a. Nombre, dirección y número de teléfono del denunciante.
 - b. Base de la denuncia (p. ej., raza, color, origen nacional, sexo, edad, discapacidad o represalia).
 - c. Una descripción detallada de las circunstancias del incidente que llevan al Demandante a creer que ocurrió discriminación.
 - d. Nombre, cargo y dirección de la(s) persona(s) que discriminaron al denunciante.
 - e. Nombre, dirección y número de teléfono de cualquier persona que pueda tener conocimiento del presunto incidente o que se perciba como parte del incidente denunciado.
 - f. Fecha o fechas en que ocurrió la supuesta discriminación.
 - g. Otras agencias donde se presentó la denuncia.
 3. Si la MPO recibe una queja, el Oficial de Cumplimiento del Título VI acusará recibo de la queja notificando al Demandante dentro de los 10 días hábiles y transmitiendo la queja a la agencia



federal o estatal correspondiente (por ejemplo, Administración Federal de Carreteras, Administración Federal de Tránsito o PennDOT) para su investigación y disposición de conformidad con los procedimientos de denuncia del Título VI de esa agencia.

4. Aunque estos procedimientos no impiden que la MPO intente resolver las quejas de manera informal, la decisión de resolverlas de manera informal siempre recae en el Demandante, quien puede retirarse del proceso informal en cualquier momento.
5. Estos procedimientos se aplican a todas las quejas externas sobre discriminación por motivos de raza, color, origen nacional (incluido el dominio limitado del inglés), edad, sexo, credo religioso o discapacidad relacionada con cualquier programa o actividad administrada por la MPO y/o sus beneficiarios. , consultores y contratistas, presentados bajo el Título VI (incluidos sus componentes de Empresas Comerciales en Desventaja e Igualdad de Oportunidades en el Empleo), así como otras leyes relacionadas que incluyen, entre otras, la Sección 504 de la Ley de Rehabilitación de 1973, la Ley de Restauración de los Derechos Civiles de 1987, y la Ley de Estadounidenses con Discapacidades de 1990.
6. El Oficial de Cumplimiento del Título VI de la MPO mantendrá un registro de todas las quejas recibidas por la MPO.

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

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

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

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

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

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

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

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



Appendix E

**Language Identification Card
Language Identification Survey**



Language Identification Card

Point to your language

Point to your language. An interpreter will be provided at no cost to you.

Amharic አማርኛ የጥያቄ ላይ የመልስተ። እስተርጓሚ የለምንም ወጪ ይቀርብልዎታል።	Hindi हिंदी आपनी भाषा की ओर संकेत करें। आपको एक दुभाषिया मुफ्त प्रदान किया जाएगा।	Punjabi ਪੰਜਾਬੀ ਆਪਣੀ ਭਾਸ਼ਾ ਦੀ ਚੋਣ ਕਰੋ। ਤੁਹਾਨੂੰ ਦੁਬਾਸ਼ੀਏ ਦੇ ਸੇਵਾ ਮੁਫਤ ਵਿੱਚ ਮੁਹੱਈਆ ਕਰਵਾਈ ਜਾਵੇਗੀ।
Arabic العربية يرجى الإشارة إلى لغتك. سيتم إمدادك بمترجم مجاناً.	Hmong Hmoob Taw tes rau koj hom lus. Yuav muab ib tug neeg txhais lus rau koj tsis tau them nqi.	Romanian Română Alegeți limba dvs. Vi se va pune la dispoziție un interpret în mod gratuit.
Bosnian (Serbo Croatian) Bosanski Pokažite koji je Vaš jezik. Bit će Vam besplatno osiguran prevodilac.	Italian italiano Indica la tua lingua. Ti sarà fornito un interprete gratuitamente.	Russian Русский Наведите курсор на свой язык. Переводчик будет предоставлен вам бесплатно.
Burmese မြန်မာစာ သင့်ဘာသာစကားကို ညွှန်းပြပါ။ သင်ကုန်ကျခံစရာမလိုဘဲ စကားပြန်တစ်ဦးကို ပိုပီးထားပါသည်။	Japanese 日本語 あなたの言語を選択してください、 通訳を無料で提供できます。	Somali Soomaali Tilmaan luqaddaada. Turjubaan ayaa bilaash laguugu siinayaa.
Cambodian ភាសាខ្មែរ សូមចង្អុលបង្ហាញភាសារបស់អ្នក។ អ្នកបកប្រែផ្ទាល់មាត់គឺឥត គ្រូបង្ហាញដល់អ្នកដោយឥតគិតថ្លៃ។	Karen ကညီကျိာ် နွဲ့နွဲ့မျှါထီၣ်ဆွဲန့တဲကတဲၣ်ကျိာ်တဲက့ၣ်, ပုၤတဲကျိာ်တဲၣ်တဲက့ၣ်ကျိ ၣ်တဲၣ်တဲလၢန့ၣ်လၢဆတဲဆိၣ်နီၣ်တဲလၢက့ၣ်လၢက့ၣ်န့ၣ်လီၤ.	Spanish Español Señale su idioma. Se le proporcionará un intérprete sin costo para usted.
Cantonese 廣東話 請點擊您所選的語言。 我們會為您提供免費傳譯員服務。	Kirundi Ikirundi Hitamo ururimi rwawe. Umuntu asigura ururimi azokuronswa nta mahera utegerejwe kuriha.	Swahili Kiswahili Ashiria lugha yako. Mkalimani ataitwa akukalimanie bila gharama yoyote kwako.
Farsi فارسی به زبان خود اشاره کنید. یک مترجم شفاهی به صورت رایگان در اختیارتان قرار خواهد گرفت.	Korean 한국어 모국어를 손가락으로 가르키시면, 무료로 통역 서비스를 제공해 드립니다.	Tagalog Ituro ang iyong wika. Ilalaan ang isang interpreter nang wala kang babayaran.
French Français Indiquez votre langue. On vous soumettra gratuitement un interprète	Laotian ພາສາລາວ ຊີ້ໃສ່ພາສາຂອງທ່ານ. ຈະມີລາມແປພາສາໃຫ້ທ່ານ ໂດຍບໍ່ໄດ້ເສຍຄ່າ.	Thai ภาษาไทย โปรดชี้ไปยังภาษาของคุณ เราจะจัดสามให้โดยไม่มีค่าใช้จ่ายสำหรับคุณ
French-Canadian français canadien Sélectionnez votre langue. Les services d'un interprète vous seront fournis gratuitement.	Mandarin 國語 / 普通話 請指出您的語言。 我们会免費為您提供一名口譯人員。	Tigrinya ትግርኛ ቋንቋኻ ኣመልከት። ተርጓሚ ብገና ከኻርብልካ እየ።
German Deutsch Zeigen Sie auf Ihre Sprache. Ihnen wird kostenlos ein Dolmetscher zur Verfügung gestellt.	Nepali नेपाली आफ्नो भाषा रोजुहोसु। तपाईंका लागि एकजना दोभाषे बिना कुनै शुल्क उपलब्ध गराइनेछ।	Turkish Türkçe İmleci dilinizi üzerine getirin. Size ücretsiz olarak bir çevirmen sağlanacaktır.
Haitian Creole Kreyòl Ayisyen Montre ki lang ou pale. Y ap ba w on entèprèt gratis.	Polish Polski Wskaź swój język. Zapewnimy ci tłumacza bezpłatnie.	Urdu اردو اپنی زبان کی نشاندہی کریں۔ آپ کو بلا معاوضہ ایک مترجم فراہم کیا جائے گا۔
Hebrew עברית נא להצביע על השפה שלך. מתורגמן יועמד לרשותך ללא עלות עבורך.	Portuguese Português Indique seu idioma. Você terá direito a um intérprete sem custos.	Vietnamese Tiếng Việt Hãy trỏ tới ngôn ngữ của bạn. Bạn sẽ được cung cấp một thông dịch viên miễn phí.

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 There Starts Here.[®]



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 քանակություն, 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"/> ឈ្មួចបញ្ជាក់ក្នុងប្រអប់នេះ 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 διαβάζετε 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 квадратикћ 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"/>	ให้กาเครื่องหมายลงในช่องที่ท่านอ่านหรือพูดภาษาไทย.	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 F

“One Moment Please” Tool

“One Moment Please” Tool

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

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



Appendix G

Telephone-Based Interpretation Service



Telephone-Based Interpretation Service Access Instructions

Non-English Speaking Caller-In Procedure

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

Non-English Speaking Visitor Procedure

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



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

TIPS

for working with an interpreter

- Interpretation is “consecutive.” This means there are pauses while the interpreter repeats each statement in the respective language.
- Speak in the “FIRST PERSON” as you would in ‘normal’ conversation (e.g. “Do you have a fever?” instead of, “Ask her if she has a fever, please.”) The interpreter is expected to interpret exactly as you state it.
- Be prepared to explain some things in more detail for the interpreter. Some terminology, concepts and cultural expressions may not have an equivalent in the target language and may need to be clarified.
- Control the flow of the conversation. Please remember the interpreter is only there to interpret. Treat the appointment as if you were providing direct service to an English speaking client.
- Ask the interpreter and the LEP client questions to ensure they understand what you want to communicate.
- Avoid asking the interpreter for his/her opinion about the situation being interpreted.
- Your interpreter should not have a side conversation with you or the client. He or she must relay everything that is said back to you or your client.
- Your interpreter should not discuss anything unrelated to the interpretation assignment.
- Follow up by providing us with feedback about your interpretation services.

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Appendix H

Language Taglines



Language Taglines

English

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

Español

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

中文

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

Tiếng Việt

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

한국어

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

Deutsche

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



Appendix I

Human Translation & Interpretation Service Providers



Translation & Interpretation Service Providers

Local Services

- Susquehanna University
Department of Languages, Literatures and Cultures
Phone: (570) 372-4693
- Bucknell University
Spanish Department
Phone: (570) 577- 577-1081
- Bloomsburg University
Languages and Cultures Department
Phone: (570) 389-4750
- Ron Radzai Translations
1400 Taylorsville Road
Ashland, PA 17921
Phone: (570) 875-1770
- Lisa Perrone (Italian)
437 James Road
Lewisburg, PA 17837
Phone: (570) 522-5075

National and International Language Services

Current SEDA-COG Provider:

- Lingualinx
<https://www.lingualinx.com/>

Current PennDOT Provider:

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

Web-Based National & International Providers:

- inWhatLanguage
<https://www.inwhatlanguage.com/>
- Straker Translations
<https://www.strakertranslations.com/>
- Net-Translations
<https://www.net-translations.com/#/en>



West Germanic - Interpretation

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



Appendix J

Community & Agency Contacts



Community & Agency Contacts

West Germanic – Community and Agency Contacts

- Mark Colussy
Mifflin County Planning Office
Phone: (717) 242-0887
Email: mcolussy@mifflinco.org
- Betty Hartzler
Mennonite Heritage Center
Phone: (717) 935-5574
Email: hartzlerkb@gmail.com
- Kay Gray
Penns Valley Area Historical Museum
Phone: (814) 349-5740
Email: gakay4875@gmail.com
- Katie de Silva
Clinton County Planning Office
Phone: (570) 893-4080
Email: kdesilva@clintoncountypa.com
- Shawn McLaughlin
Union County Planning Office
Phone: (570) 524-3840
Email: smclaughlin@unionco.org

Spanish – Community Contacts

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

Spanish – Church Contacts

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



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

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

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



Appendix K

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



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

LEP Plan Status	
Is SEDA-COG MPO receiving federal funding?	<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
Interactions with LEP Persons	
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)
Identifying LEP Communities	
Does SEDA-COG MPO have a process for collecting data on the number of LEP persons in the service area and the languages most commonly spoken?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How often is the language data for SEDA-COG MPO's service area analyzed?	Once every _____ years.
What techniques and resources are used by SEDA-COG MPO to identify LEP communities? (e.g., spatial mapping, community input, etc.)	Describe: _____ _____ _____ _____ _____



Limited English Proficiency Plan Self-Assessment Checklist

(Continued, 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)

Providing Notice of Language Assistance	
<p>How does SEDA-COG MPO inform the public about the availability of language assistance services? (e.g., posters, website, etc.)?</p>	<p>Describe: _____</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>
Providing Language Assistance	
<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)

Training & Staff Resources	
<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>Describe: _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
Monitoring and Updating the Language Assistance Plan	
<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>Describe: _____</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 5 years</p> <p><input type="checkbox"/> Every _____ years</p>
<p>When was the LAP last updated?</p>	<p>Date: _____</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

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

APPENDIX G

Coordinating Committee Membership

**SEDA-COG METROPOLITAN PLANNING ORGANIZATION (MPO)
COORDINATING COMMITTEE MEMBERSHIP REPRESENTATION
(March 2022)**

Clinton County	Katie de Silva, County Planning Director
Columbia County	Eric Stahley, County Resiliency Officer
Juniata County	Brad Kerstetter, County Planning Director
Mifflin County	Mark Colussy, County Planning Director
Montour County	Greg Molter, County Planning Director
Northumberland County	Justin Skavery, County Planning Director
Snyder County	Lincoln Kaufman, County Planning Director
Union County	Shawn McLaughlin, County Planning Director
Town of Bloomsburg	Lisa Dooley, Town Manager
Borough of Berwick	Jack Kyttle, Borough Public Works Foreman
PennDOT District 2-0	Mark Schultz, Planning & Programming Manager
PennDOT District 3-0	Jonathan Ranck, Transportation Planning Specialist
PennDOT Central Office	Carey Mullins, Transportation Planning Specialist
Transit Interests	Michele Holman, rabbitransit Assistant General Manager
Multi-modal Interests	Steve Phillips, retired
SEDA-COG Board of Directors	Richard Ridgway, Columbia County Commissioner
SEDA-COG Transportation Program	Steve Herman, Transportation Program Director

**SEDA-COG METROPOLITAN PLANNING ORGANIZATION (MPO)
COORDINATING COMMITTEE RACE/GENDER BREAKDOWN
(March 2022)**

Coordinating Committee: 17 Voting Members

Male: 14

Female: 3

White: 17

Minority: 0



November 22, 2021

Mr. David Witchey, Chief Clerk
Columbia County
11 West Main Street
Bloomsburg, PA 17815

Re: Re-appointment of Mr. Eric Stahley to the SEDA-COG MPO

Dear Mr. Witchey:

Columbia County is represented on the SEDA-COG Metropolitan Planning Organization (MPO) by Eric Stahley. The SEDA-COG MPO has the authority to conduct transportation planning and programming activities for the eight-county region that includes: Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union Counties.

The SEDA-COG MPO has benefited from the past participation of Mr. Stahley as Columbia County's voting representative on the MPO. It is requested that the Columbia County Commissioners re-appoint Mr. Stahley, or a representative of their choosing, to continue as the county's voting representative on the SEDA-COG MPO. If the Commissioners concur, please forward me confirmation on county letterhead. Mr. Stahley will be able to designate a voting proxy for future MPO meetings, as required.

The success of the MPO is ensured by active participation and input from its members. To that end, and in accordance with Title VI regulations and guidelines stipulating non-elected Board representatives endeavor to reflect community demographics within the MPO, including those groups or communities traditionally not well-served by existing transportation systems, SEDA-COG MPO encourages the participation of underserved and potentially vulnerable residents on its Board.

A sample resolution is enclosed for use in confirming your county's re-appointment of a voting member to the SEDA-COG MPO.

The re-appointment's total term will last four years; upon expiration, you will be asked to re-appoint your representative to subsequent 4-year terms. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "James Saylor".

James Saylor, P.E., PTOE
Transportation Planning Program Director

Enclosure

cc: Mr. Eric Stahley

APPENDIX H

Board Adoption of MPO Title VI Program

**RESOLUTION
SEDA-COG METROPOLITAN PLANNING ORGANIZATION
TITLE VI PROGRAM**

RESOLUTION 2022-1

RESOLUTION of the SEDA-COG Metropolitan Planning Organization (MPO) to adopt the SEDA-COG MPO Title VI Program.

WHEREAS, the SEDA-COG MPO is a recipient of federal funding and is required to develop and maintain a Title VI Program in accordance with Title VI of the Civil Rights Act of 1964 and other related statutes, executive orders, and regulations; and

WHEREAS, for all federal funding recipients (including subrecipients), the Title VI Programs must demonstrate how the recipient is complying with Title VI requirements; and

WHEREAS, the SEDA-COG MPO intends that no person shall on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of the MPO's programs or activities, regardless of funding source; and

WHEREAS, a Title VI Program has been developed for the SEDA-COG MPO, which aims to meet Title VI requirements; and

WHEREAS, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity; and

NOW, THEREFORE, BE IT RESOLVED that the SEDA-COG Metropolitan Planning Organization (MPO) adopts the SEDA-COG MPO's Title VI Program as required by federal regulations.

I, James Saylor, **HEREBY CERTIFY** that I am Chairman of the SEDA-COG MPO: that the foregoing resolution was adopted, in accordance with the Bylaws, by the Members of said MPO at a meeting duly called and held on June 10, 2022, and that said resolution is now in full force and effect.

IN TESTIMONY WHEREOF I hereto subscribe my name as Chairman.

James Saylor, SEDA-COG MPO Chairman

APPENDIX I

**Environmental Justice Benefits and Burdens Analysis for the
FFY 2023-2026 SEDA-COG TIP**

2023-2026 TIP Environmental Justice Benefits and Burdens Analysis

Presidential Executive Order 12898 on Environmental Justice (EJ) focuses federal attention on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities. Within the transportation field, environmental justice is guided by three core principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decisionmaking process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

In 2019, the South Central Pennsylvania MPO EJ Process Development Study was released. The Unified Environmental Justice Process and Methodology Guide was the result of an inter-regional collaborative process by MPOs in PennDOT District 8, PennDOT Central Office, the Federal Highway Administration, and the Federal Transit Administration.

A key portion of the new methodology is the definition of Low-Income and Minority Populations.

- Low-Income – The FHWA and USDOT EJ Orders define a “low-income” individual as a person whose median household income is at or below the Department of Health and Human Services (HHS) poverty guidelines.
- Minority Populations – The FHWA and USDOT EJ Orders define a “minority” individual as a person who is:
 - (1) Black
 - (2) Hispanic or Latino
 - (3) Asian American
 - (4) American Indian and Alaskan Native
 - (5) Native Hawaiian and Other Pacific Islander

The core methods outlined in the guide are:

- Identify Environmental Justice Populations
- Assess Conditions and Identify Needs
- Evaluate Benefits and Burdens of Program
- Identify and Address Disproportionately High and Adverse Impacts

This report summarizes the activities, analyses, and outcomes that were completed as a part

of the SEDA-COG MPO 2023 Transportation Program development process in compliance with Environmental Justice policies.

Identify Environmental Justice Populations

In response to the identified EJ policies, a distributive geographic analysis was conducted to identify the locations and concentrations of minority and low-income populations. The demographic profile describes the social composition of the SEDA-COG MPO region and illustrates how demographic patterns vary spatially.

The identification of these populations is essential to establishing effective strategies for engaging them in the transportation planning process. When meaningful opportunities for interaction are established, the transportation planning process can draw upon the perspectives of communities to identify existing transportation needs, localized deficiencies, and demand for transportation services. Mapping of these populations not only provides a baseline for assessing impacts of the transportation investment program, but also aids in the development of an effective public involvement program.

MPOs are expected to:

- Avoid the use of thresholds. The use of thresholds can cause some populations to be unaccounted for in the analysis because they are not of a certain size in comparison to the region.
- When mapping, use more disaggregated Census geographies (e.g., block groups). The more aggregated the geographic level of the analysis, the higher the probability that pockets of low-income and minority populations will be missed.
- Consider geographically dispersed or transient persons. USDOT guidance directs funding recipients to consider all people present in an area, not just the residents. Non-resident persons who travel through or to an area and belong to minority or low-income populations should be considered.
- Verify data and be aware of limitations. Much of the data used in the process are estimates and may have significant margins of error.
- Engage representatives and leaders of minority or low-income populations. MPOs should conduct outreach to leaders of minority or low-income populations to verify data and gain a deeper understanding of the culture and diversity of the area.

The American Community Survey (ACS) provides information on the characteristics of the population – and is not meant to count the population. ACS data are sample data and different samples would yield different estimates of the actual population value. Approximately 1 in 38 U.S. households per year receives an invitation to participate in the ACS. The margin of error is a measure of the possible variation of the estimate around the population value. ACS estimates carry larger margins of error than decennial Census sample estimates. This is especially true for small areas and population groups. Due to the small population located within certain Census tracts in the SEDA-COG MPO region, margin of error must be considered when considering the population represented by the data.

Table 1 provides a summary of the U.S. Census American Community Survey 2015-2019 5-

Year Estimates data at the county and MPO levels. The regional average of minority populations is 7.34%. This is an increase from the 2011-2015 ACS dataset of 7.02%. The regional average for population for whom poverty status is determined has remained consistent from previous years at ~13%.

Table 1: Profile of Traditionally Underserved Populations in the SEDA-COG MPO Region	SEDA-COG MPO Region									
	Clinton County	Columbia County	Juniata County	Mifflin County	Montour County	North-umberland County	Snyder County	Union County	Total Population	Regional Threshold (Average Concentration)
Total Population	38,915	65,715	24,624	46,276	18,259	91,761	40,483	45,111	371,144	
Minority Population ¹	1,880	4,462	742	1,429	1,582	6,897	1,990	7,147	26,129	7.34%
Senior Population ²	7,121	12,443	4,896	9,787	3,768	19,142	7,419	7,996	72,572	19.6%
Total Population for whom Poverty Status is Determined	37,185	61,000	24,326	45,537	17,546	87,589	38,125	36,023	347,331	
Low-Income Population ³	5,777	9,150	2,637	6,127	1,836	11,552	3,983	4,258	45,320	13.05%
Total Population Age 5 or Older	36,838	62,775	23,208	43,417	17,207	87,029	38,314	43,026	351,814	
Limited English Proficiency Population ⁴	613	559	941	1,159	301	1,256	902	1,174	6,905	1.96%
Total Civilian Non-Institutionalized Population	38,358	64,957	24,386	45,674	17,584	87,881	40,150	39,694	358,684	
Disabled Population ⁵	6,368	9,037	3,327	7,288	2,423	14,574	4,842	5,216	53,075	14.8%
Total Households	14,690	26,372	9,372	19,043	7,404	39,075	14,794	14,533	145,283	
Zero Vehicle Households ⁶	1,450	1,721	729	2,118	1,016	4,141	1,043	1,290	13,508	9.3%

Female Head of Household with own Children⁷	474	990	184	793	348	1,513	497	494	5,293	3.64%
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Source: U.S. Census Bureau, American Community Survey (ACS), 2015-2019 5-Year Estimates

Notes:

¹ Minority Population: Table DP05, ACS Demographic and Housing Estimates, -RACE- Calculated as "Total Population" minus "One race - White".

² Senior Population: Table DP05, ACS Demographic and Housing Estimates, SEX AND AGE - Value given as "Total Population: 65 years and over".

³ Low-Income Population: Table S1701, Poverty Status in the Past 12 Months - Value given as "Population for whom poverty status is determined: Below poverty level".

⁴ Limited English Proficiency Population: Table S1601, Language Spoken At Home - Value given as "Population 5 years and over: Language other than English: Speak English less than 'very well'".

⁵ Disabled Population: Table S1810, Disability Characteristics - Value given as "Total civilian non-Institutionalized population: With a disability".

⁶ Zero Vehicle Households: Table B08201, Household Size by Vehicles Available - Value given as "Total Households: No vehicle available".

⁷ Female Head of Household with Children: Table DP02, Selected Social Characteristics in the United States, Households by Type - Value given as "Family households: Female householder, no husband present family: With own children under 18 years".

For the statewide 2023 Transportation Improvement Program (TIP) environmental justice analysis, basic data and maps were compiled by the Williamsport Area Transportation Study MPO (WATS). All of the data was refreshed, and the ACS specific data was updated to the 2015-2019 estimates. The following statement explains the methodology used in the identification of minority and low income populations from the Statewide Environmental Justice Analysis Methodology 2023-2026 Pennsylvania Transportation Improvement Program:

“The process followed for the 2021-2024 program update classified low income and minority population percentages based on natural breaks of the percentages of those populations present within the block groups of each county in Pennsylvania. The result of this was to create a custom classification of symbol intervals for each county. The presence of 67 different interval scales would lead to conducting 67 separate analyses downstream in the workflow.

Instead, WATS staff found that when Census block groups were classified into intervals based on the ratio of census block group minority/low income percentage to county or region overall minority/low income percentage (i.e. a ratio of “1” indicates a census block group has the same minority or low income percentage as the county average) that they were able to produce a uniform scale usable across all counties or regions in the state. One side effect of this approach is that it resulted in some counties not having all intervals. However, it gives us a uniform and easily communicated and understood way of classifying the relative concentrations of low income and minority populations across the state of Pennsylvania.

As an example, based on the procedure described above, WATS staff defined interval “1” as being all census block groups with a minority population percentage less than half the countywide or regional minority population percentage. The result is that any counties or regions with no census block groups that fit that criterion do not have that interval. By standardizing the intervals across the state we are able to make apples-to-apples comparisons between counties and regions and also the ability to scale the analysis up to larger geographic scales (or down to smaller scales) which gives us a stronger analytical product.”

Figures 1 and 2 show the ratios of low income or minority population percentage in a census block group to the MPO region low income or minority population percentage. As evidenced by the low-income map specifically, low-income populations are more densely represented in the northcentral portion of the region, as well as central Juniata County. The minority map similarly shows a high representation in the northcentral portion of the region but brings in some additional areas of Columbia, Montour, and southern Northumberland Counties. It is important to note that two of the census block groups in the northeastern portion of Union County are home to federal prisons.

Figure 1: Concentrations of Low Income Population

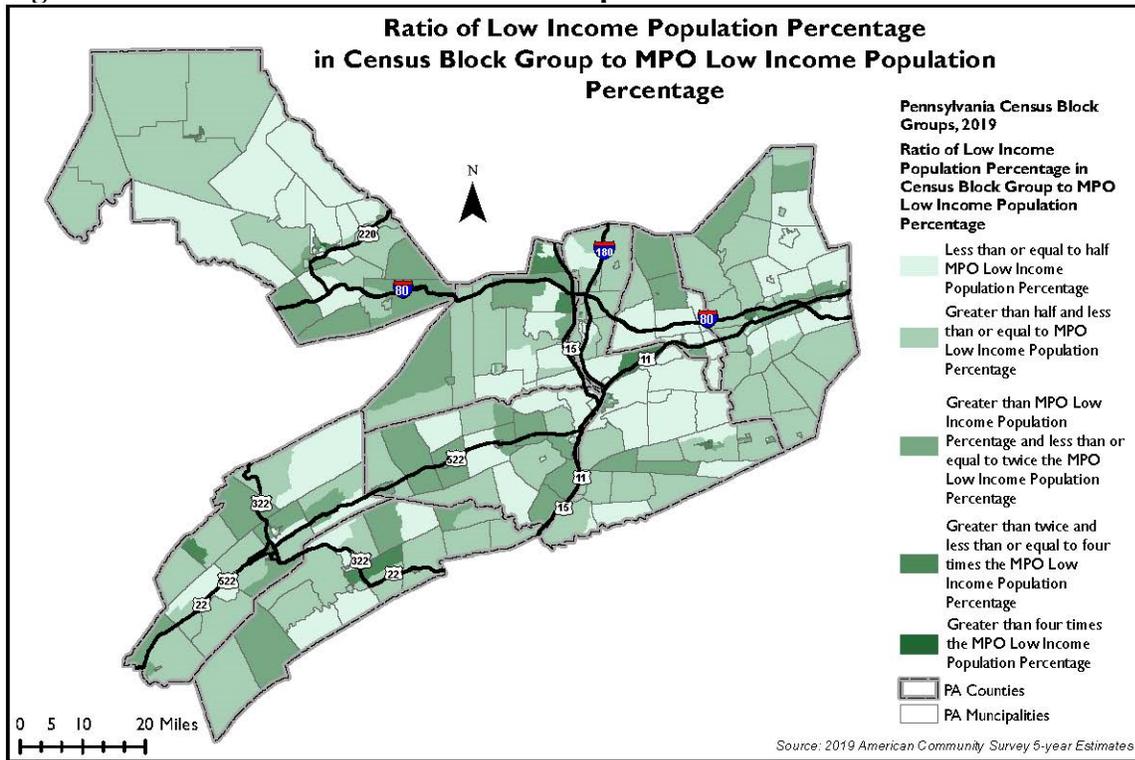
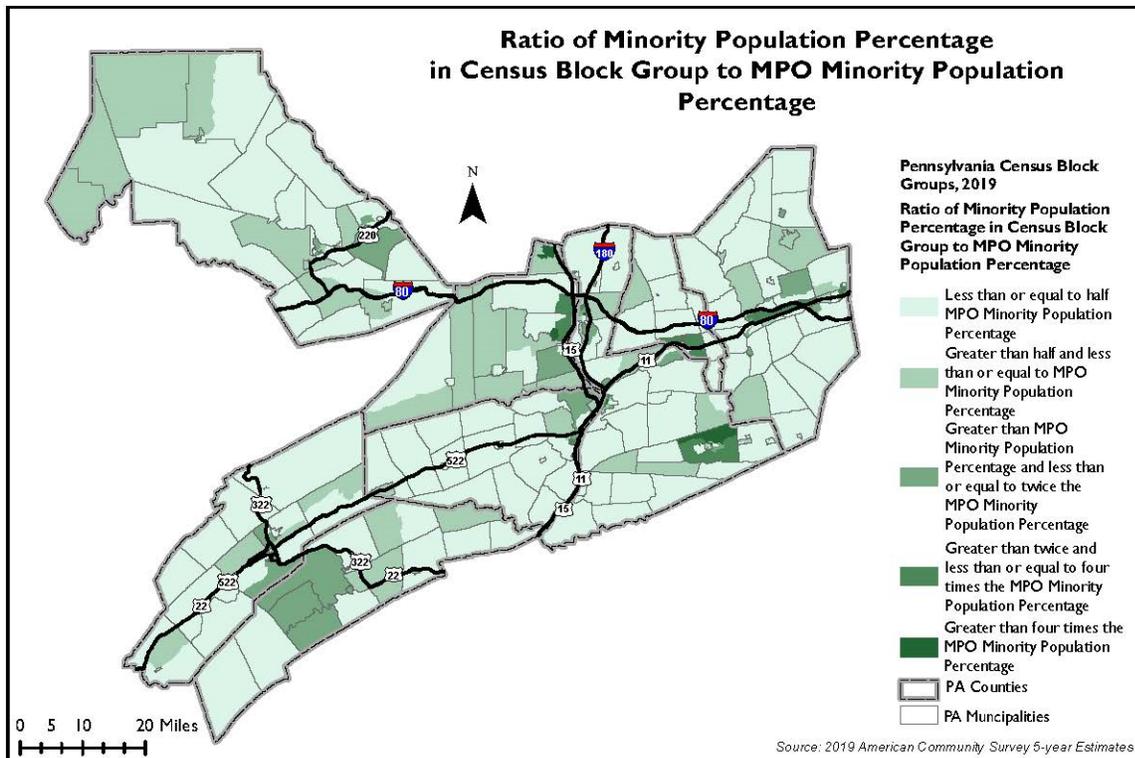


Figure 2: Concentrations of Minority Population



Figures 3 and 4 show dot density mapping of low income and minority populations by census block group.

Figure 3: Dot Density Concentrations of Low Income Population

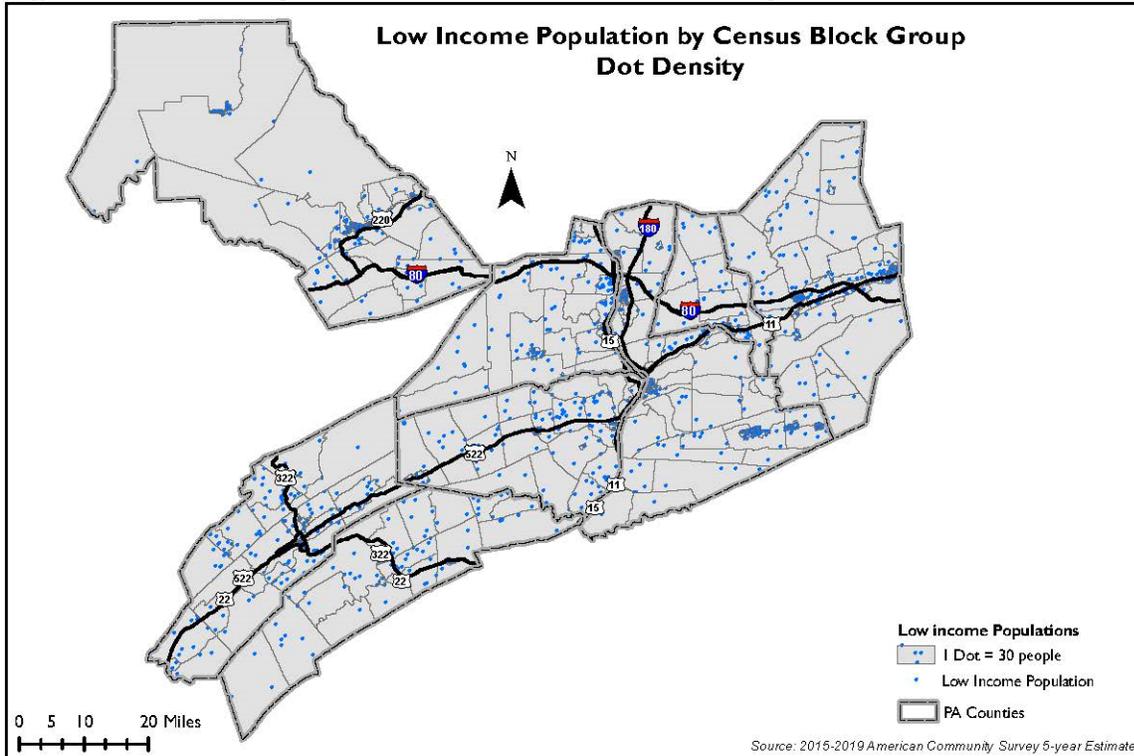
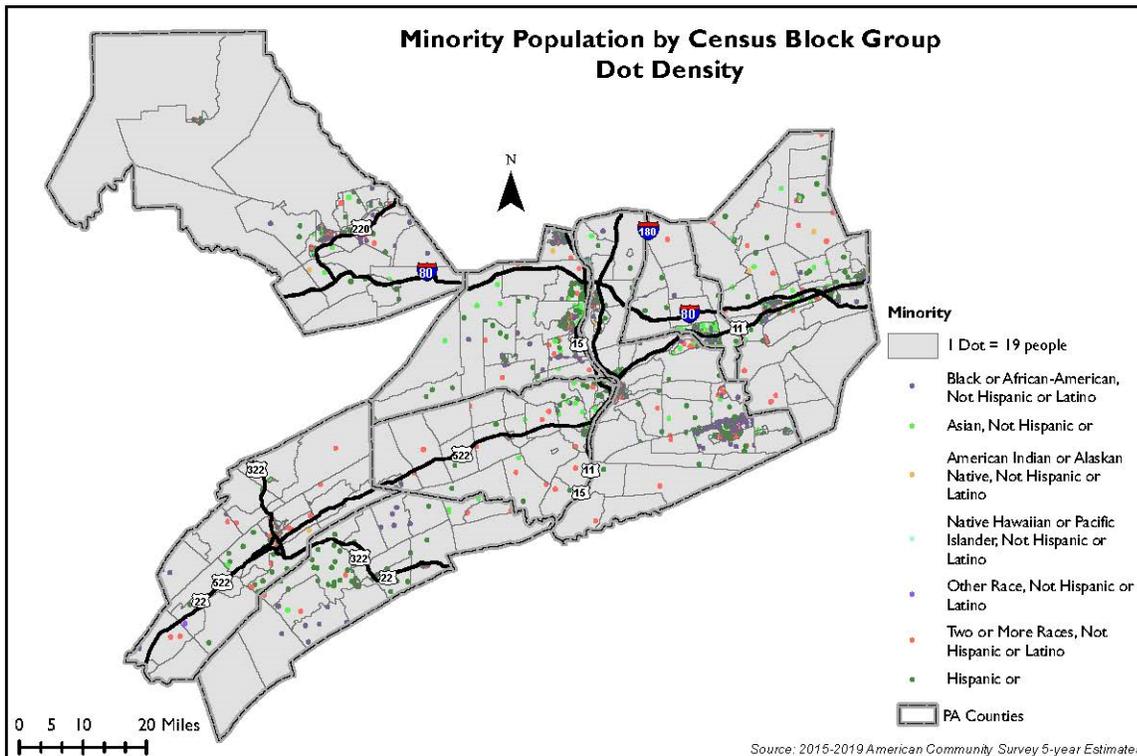


Figure 4: Dot Density Concentrations of Minority Population



Tables 2 and 3 show the breakdown of low income and minority population totals across the block groups within these intervals throughout the SEDA-COG MPO region. The intervals referenced (1 through 5) are the same intervals shown on Figures 1 and 2 by the green gradient of color [lighter green equals interval 1; darkest green equals interval 5].

Table 2: Low Income Population by Interval			
Low Income Population Interval	Low Income Population	Total Population	Percent Low Income
1	4,042	102,058	3.96%
2	11,389	117,211	9.72%
3	15,487	89,521	17.30%
4	12,600	35,478	35.51%
5	1,802	3,063	58.83%
Total	45,320	347,331	13.05%

Table 3: Minority Population by Interval			
Minority Population Interval	Minority Population	Total Population	Percent Minority
1	3,153	192,795	1.64%
2	4,125	77,201	5.34%
3	5,039	48,871	10.31%
4	8,412	40,293	20.88%
5	6,515	11,984	54.36%
Total	27,244	371,144	7.34%

Assess Conditions and Identify Needs

Safety Conditions: Figures 5 and 6 highlight the bicycle and pedestrian fatalities in the region. The fatalities appear to be evenly dispersed over the region.

Figure 5: Concentrations of Low Income Population with Bicycle and Pedestrian Fatalities

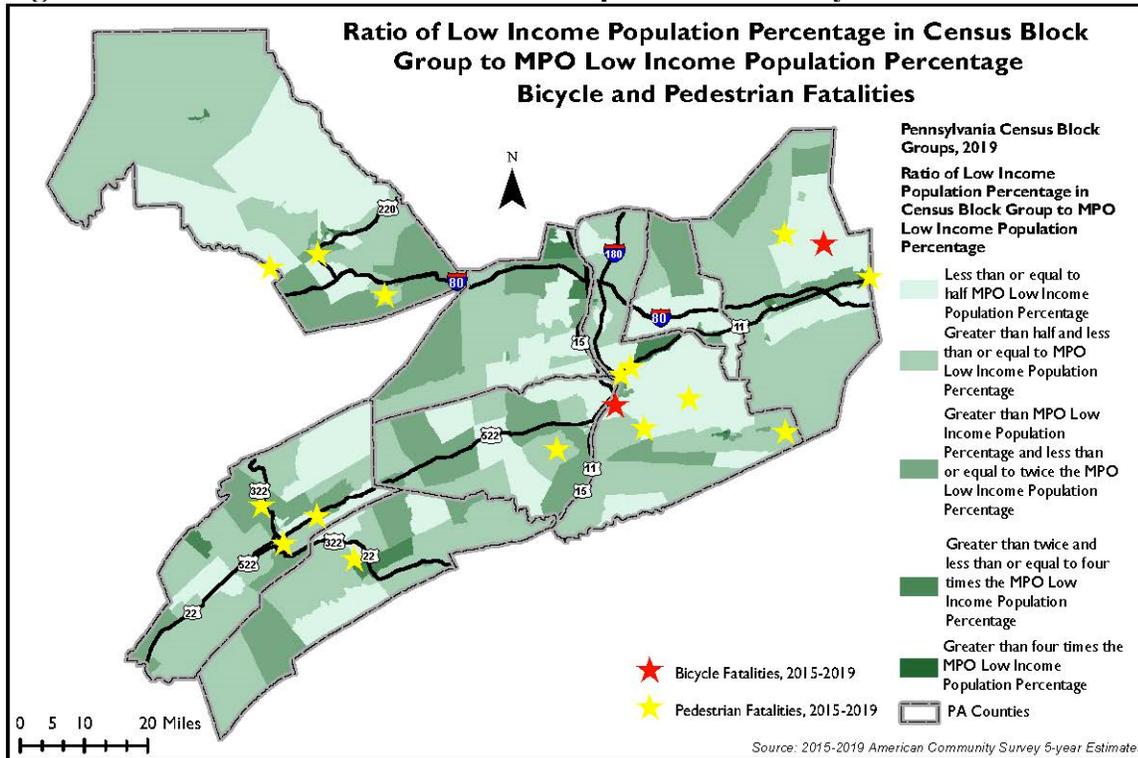
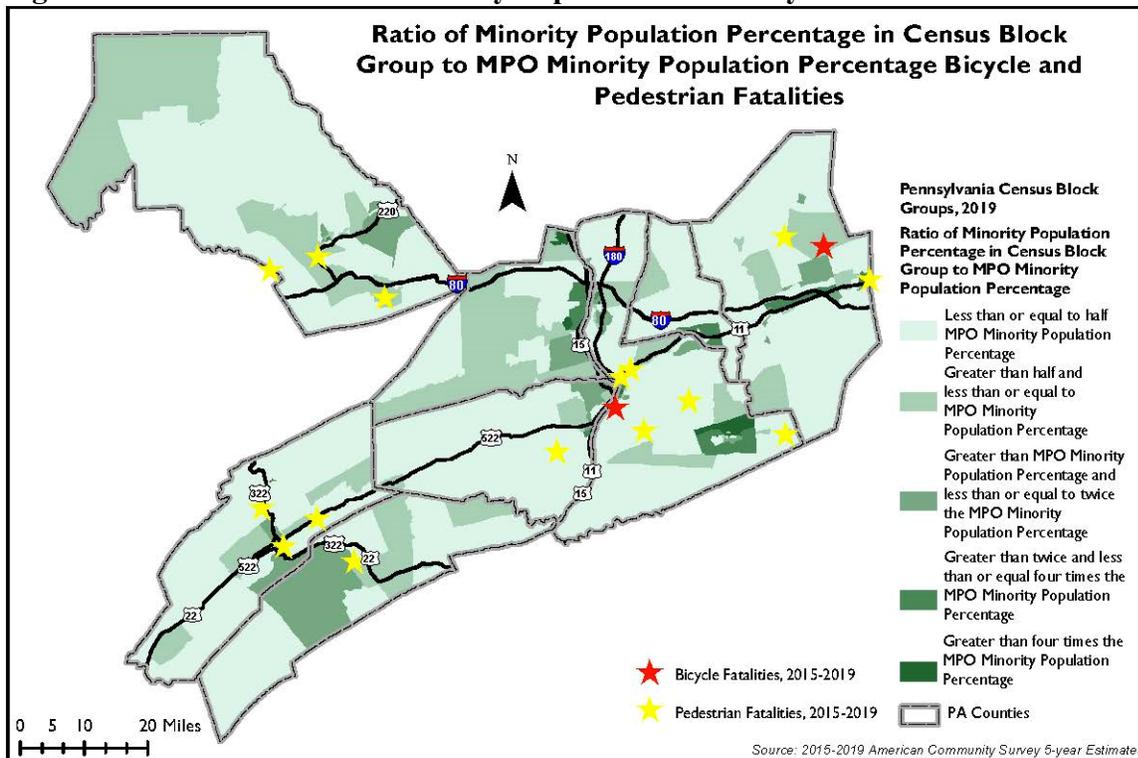


Figure 6: Concentrations of Minority Population with Bicycle and Pedestrian Fatalities



Tables 4 and 5 show bicycle and crash data by interval in the SEDA-COG MPO region. The same color gradient applies to this tables as was discussed above in the Identification of EJ Populations section. These charts do include a column for horse and buggy crashes as well. This is particularly important to our region, as we have a larger Amish and Plain Sect population.

Table 4: Low Income Bicycle and Pedestrian Crash Data							
Low Income Population Interval	Low Income Population	Total Population	Percent Low Income	People on Bicycles Involved in Crashes (2015 - 2019)	Pedestrians Involved in Crashes (2015 - 2019)	Total Persons Using Nonmotorized Modes Involved in Crashes (2015 - 2019)	Horse and Buggy Crashes (2015 - 2019)
1	4,042	102,058	3.96%	23	85	147	11
2	11,389	117,211	9.72%	34	75	177	22
3	15,487	89,521	17.30%	30	96	175	15
4	12,600	35,478	35.51%	18	79	110	2
5	1,802	3,063	58.83%	0	19	21	0
Total	45,320	347,331	13.05%	105	354	630	50

Table 5: Minority Bicycle and Pedestrian Crash Data							
Minority Population Interval	Minority Population	Total Population	Percent Minority	People on Bicycles Involved in Crashes (2015 - 2019)	Pedestrians Involved in Crashes (2015 - 2019)	Total Persons Using Nonmotorized Modes Involved in Crashes (2015 - 2019)	Horse and Buggy Crashes (2015 - 2019)
1	3,153	192,795	1.64%	44	145	293	36
2	4,125	77,201	5.34%	34	85	163	13
3	5,039	48,871	10.31%	16	57	89	3
4	8,412	40,293	20.88%	5	62	74	0
5	6,515	11,984	54.36%	1	8	11	0
Total	27,244	371,144	7.34%	100	357	630	52

Tables 6 and 7 show general crash data by interval in the SEDA-COG MPO region. Most of the crashes fall in the first interval of minority and low-income populations.

Table 6: Low Income Crash Data							
Low Income Population Interval	Low Income Population	Total Population	Percent Low Income	Total reportable crashes (2015 - 2019)	Persons Involved in Reportable Crashes (2015 - 2019)	Crash Fatalities (2015 - 2019)	Crash Suspected Serious Injuries (2015 - 2019)
1	4,042	102,058	3.96%	6,408	13,580	85	286
2	11,389	117,211	9.72%	6,720	13,451	90	344
3	15,487	89,521	17.30%	5,523	12,091	79	241
4	12,600	35,478	35.51%	1,961	4,681	11	69
5	1,802	3,063	58.83%	210	486	1	6
Total	45,320	347,331	13.05%	20,822	44,289	266	946

Table 7: Minority Crash Data							
Minority Population Interval	Minority Population	Total Population	Percent Minority	Total reportable crashes (2015 - 2019)	Persons Involved in Reportable Crashes (2015 - 2019)	Crash Fatalities (2015 - 2019)	Crash Suspected Serious Injuries (2015 - 2019)
1	3,153	192,795	1.64%	11,194	23,240	161	577
2	4,125	77,201	5.34%	4,914	10,690	75	188
3	5,039	48,871	10.31%	2,314	5,078	18	87
4	8,412	40,293	20.88%	1,889	4,198	11	61
5	6,515	11,984	54.36%	295	686	3	20
Total	27,244	371,144	7.34%	20,606	43,892	268	933

Bridge Conditions: Figures 7 and 8 show the poor bridge condition by deck area for the region. Most of the poor condition bridges are under 3,000 square feet.

Figure 7: Concentrations of Low Income Populations with Poor Bridges

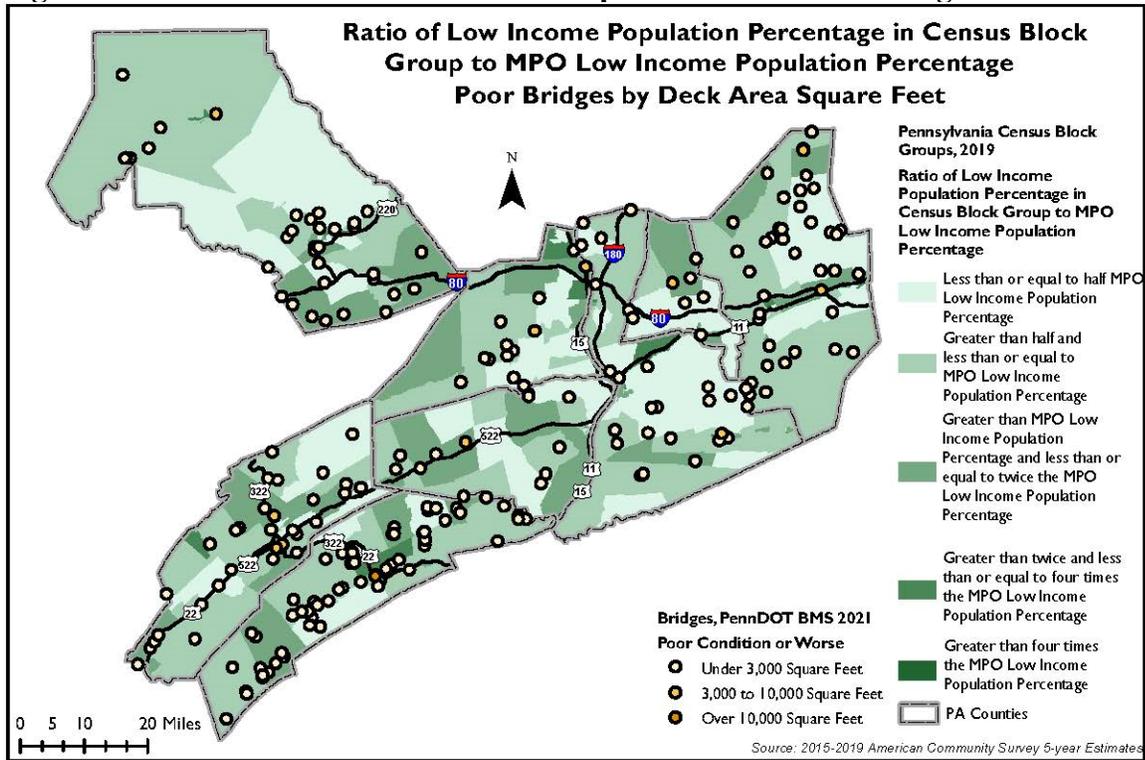
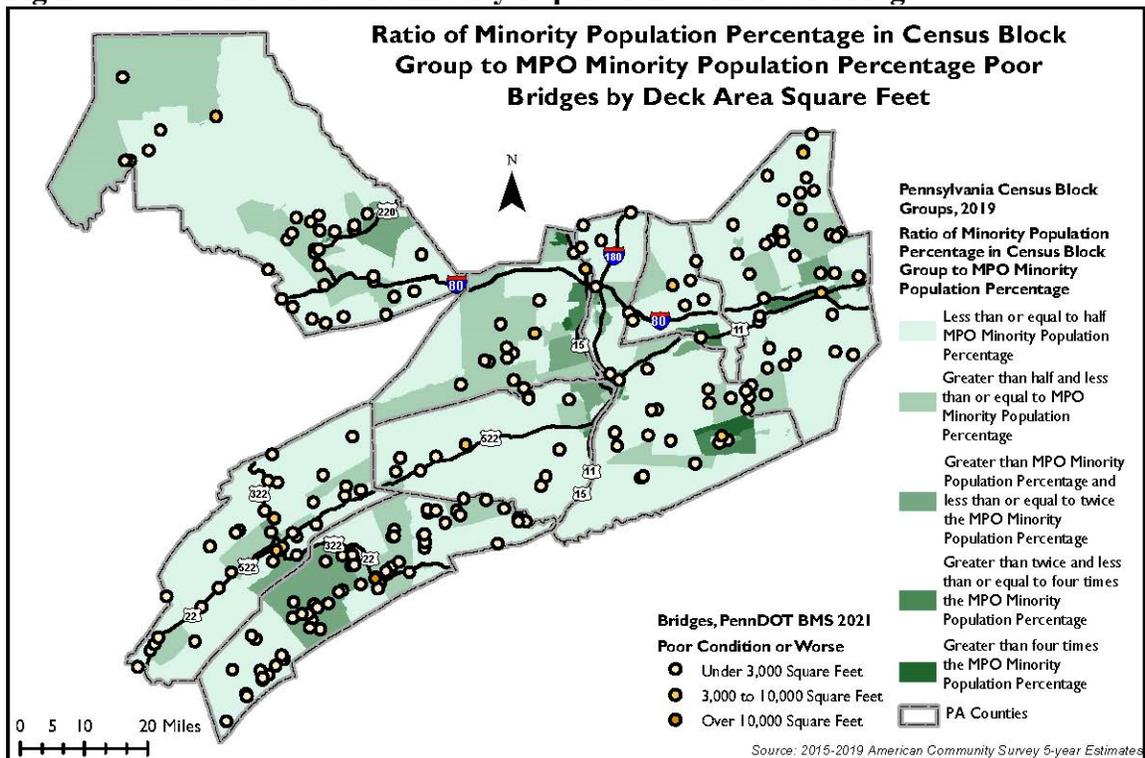


Figure 8: Concentrations of Minority Populations with Poor Bridges



Tables 8 and 9 highlight the bridge conditions by interval in the SEDA-COG MPO region.

Table 8: Low Income Bridge Condition						
Low Income Population Interval	Low Income Population	Total Population	Percent Low Income	Bridges in Poor condition or worse	Bridges in Fair Condition or better	Total Bridges
1	4,042	102,058	3.96%	65	1,199	1,264
2	11,389	117,211	9.72%	132	1,550	1,682
3	15,487	89,521	17.30%	60	903	963
4	12,600	35,478	35.51%	11	165	176
5	1,802	3,063	58.83%	0	4	4
Total	45,320	347,331	13.05%	268	3,821	4,089

Table 9: Minority Bridge Condition						
Minority Population Interval	Minority Population	Total Population	Percent Minority	Bridges in Poor condition or worse	Bridges in Fair Condition or better	Total Bridges
1	3,153	192,795	1.64%	151	2,410	2,561
2	4,125	77,201	5.34%	75	819	894
3	5,039	48,871	10.31%	24	309	333
4	8,412	40,293	20.88%	5	149	154
5	6,515	11,984	54.36%	0	20	20
Total	27,244	371,144	7.34%	255	3,707	3,962

Pavement Conditions: Figures 9 and 10 show the fair and poor International Roughness Index (IRI) for roads in the MPO region. The Route 11 & 15 corridors (from Shamokin Dam-Northumberland) are highly traveled and see high numbers of truck traffic. Some of this situation may be alleviated with the completion of the Central Susquehanna Valley Transportation (CSVT) Project.

Figure 9: Concentration of Low Income Populations with IRI

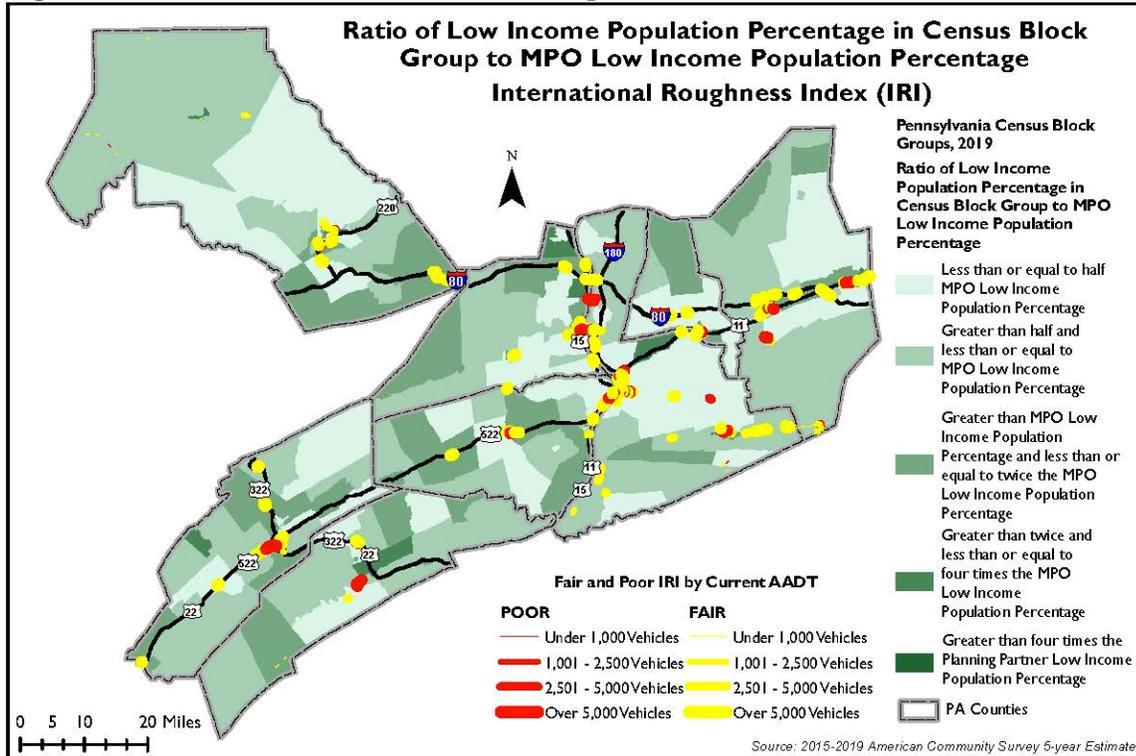
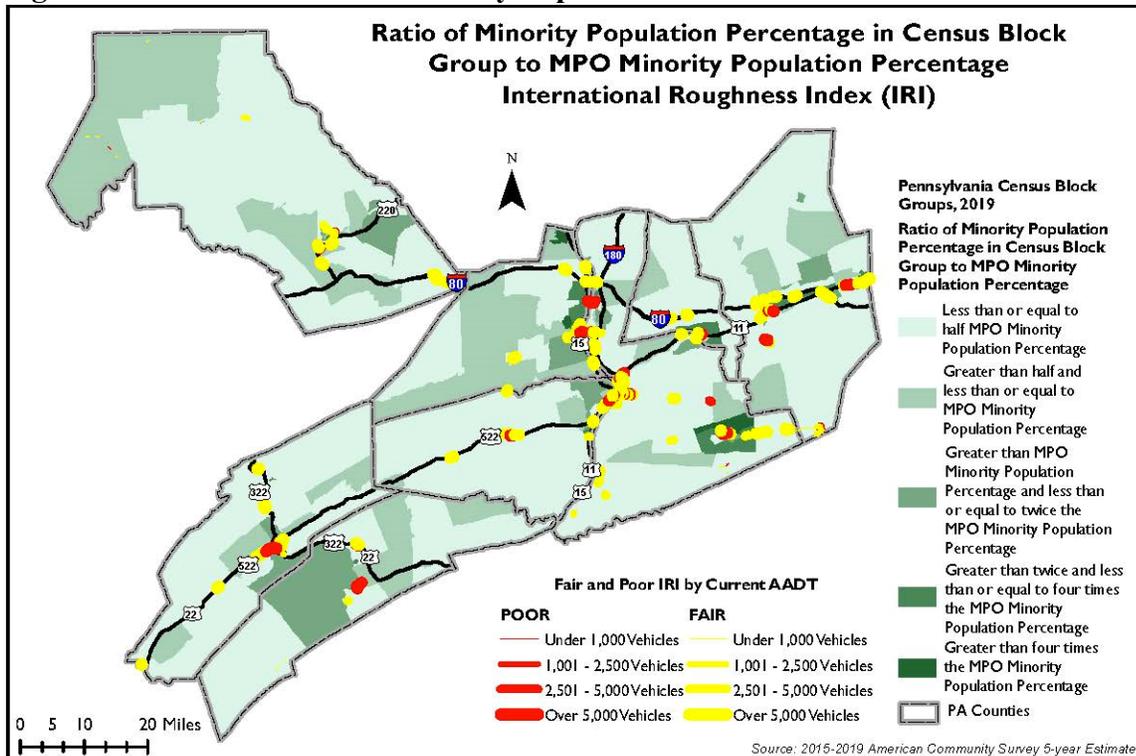


Figure 10: Concentration of Minority Populations with IRI



Tables 10 and 11 show the IRI data for minority and low-income populations.

Table 10: Low Income IRI									
Low Income Population Interval	Low Income Population	Total Population	Percent Low Income	Federal Aid Segment Miles with EXCELLENT IRI	Federal Aid Segment Miles with GOOD IRI	Federal Aid Segment Miles with FAIR IRI	Federal Aid Segment Miles with POOR IRI	Federal Aid Segment Miles with OTHER IRI	Total Federal Aid Segment Miles (IRI)
1	4,042	102,058	3.96%	224	85	18	4	1	332
2	11,389	117,211	9.72%	331	131	30	6	2	499
3	15,487	89,521	17.30%	191	85	27	7	1	311
4	12,600	35,478	35.51%	39	22	10	5	0	76
5	1,802	3,063	58.83%	1	2	1	1	0	5
Total	45,320	347,331	13.05%	787	324	85	23	3	1,223

Table 11: Minority IRI									
Minority Population Interval	Minority Population	Total Population	Percent Minority	Federal Aid Segment Miles with EXCELLENT IRI	Federal Aid Segment Miles with GOOD IRI	Federal Aid Segment Miles with FAIR IRI	Federal Aid Segment Miles with POOR IRI	Federal Aid Segment Miles with OTHER IRI	Total Federal Aid Segment Miles (IRI)
1	3,153	192,795	1.64%	489.60	175.06	47.46	6.70	1.54	720.35
2	4,125	77,201	5.34%	170.49	67.39	18.73	6.87	1.82	265.31
3	5,039	48,871	10.31%	48.13	28.99	11.66	4.68	0.00	93.46
4	8,412	40,293	20.88%	42.09	24.79	8.87	1.78	0.00	77.52
5	6,515	11,984	54.36%	9.57	6.78	1.88	1.23	0.04	19.51
Total	27,244	371,144	7.34%	759.89	303.00	88.60	21.26	3.41	1,176.14

Transit Conditions: Figures 11 and 12 show the fixed route transit facilities in the SEDA-COG MPO region. The SEDA-COG MPO region has only one fixed route transit system. It is the Lower Anthracite Transportation System (LATS). LATS has two seasonal routes to the Susquehanna Mall in the winter and Knoebels Amusement Park in the summer. LATS also has a fixed route throughout the southeast corner of Northumberland County.

Figure 11: Concentrations of Low Income Populations with Transit Providers

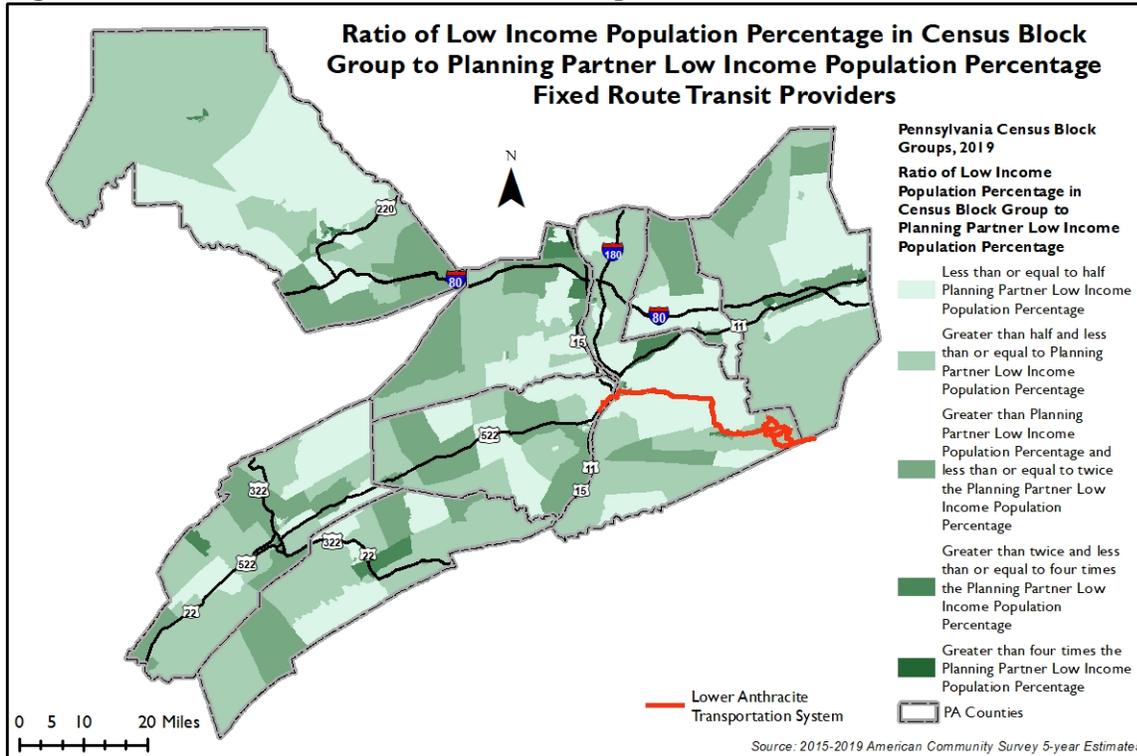
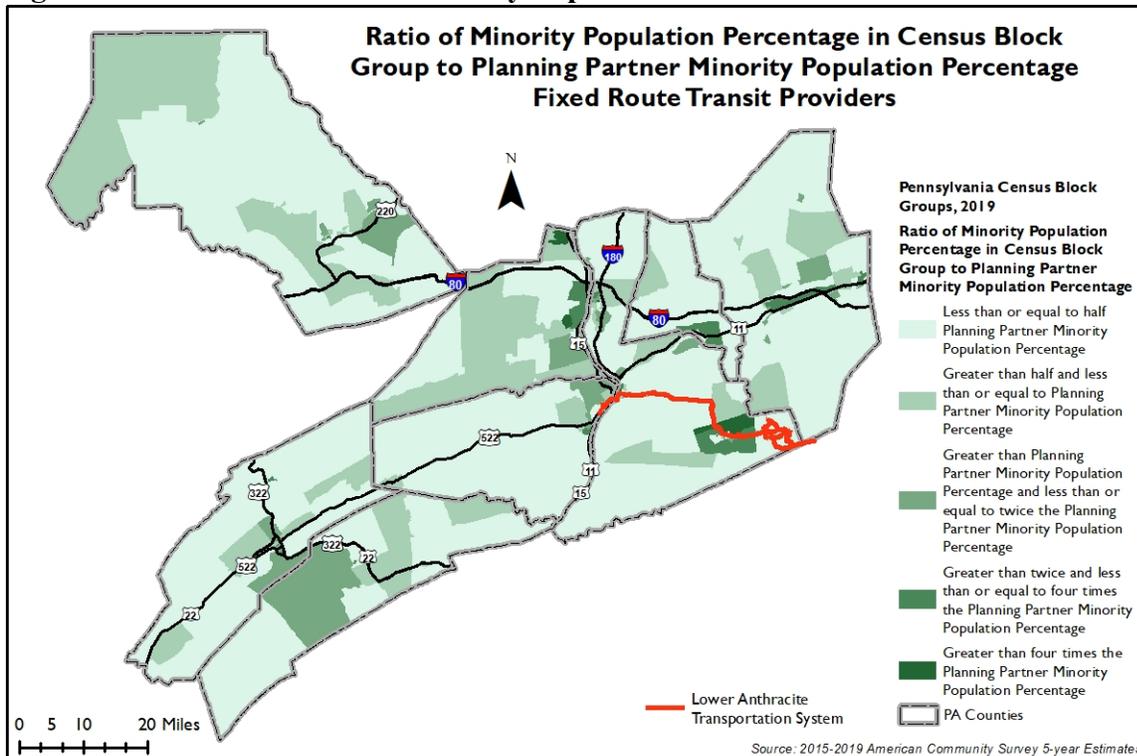


Figure 12: Concentrations of Minority Populations with Transit Providers



Evaluation of Benefits and Burdens of Program

The Benefits and Burdens Analysis provides feedback on the equity of the Transportation Improvement Program (TIP), examines the impact that it has on minority and low-income populations, and identifies any disproportionate impacts.

Benefits are the positive impacts from investment such as enhancements in transportation services/options, increases in public safety, congestion relief, increased economic vitality, reduced travel times, etc. Burdens, on the other hand, are the adverse effects of investment such as pollution (noise and air), disruption of community cohesion, displacement of persons or businesses, destruction or decrease of economic vitality, adverse employment effects, decline in tax base or property values, diminished esthetics, disruption of businesses, parking/access to transit, congestion, or the denial, delay or reduction of receipt of benefits.

Per federal guidance, the evaluation of benefits and burdens for a program is to include project categorization, mapping, and a qualitative narrative.

Figure 13 and Figure 14 show the distribution of TIP projects throughout the region. The TIP projects are well distributed throughout the MPO region. The asset management projects that are located in areas with greatest minority population concentration may contribute to some short-term impacts during construction, but will generally benefit those residents by improving traveling conditions and safety for all users.

Included on the TIP are five transit projects that do not lend themselves to being mapped. Those projects are as follows:

- MPMS 115130 – Upgrade server/networking**
- MPMS 115132 – Replace 5 computers**
- MPMS 115139 – Purchase 20 Tablets**
- MPMS 115140 – Replace small transit bus**
- MPMS 115127 – Purchase Vehicles**

Figure 13: Concentrations of Low Income Populations with TIP Projects

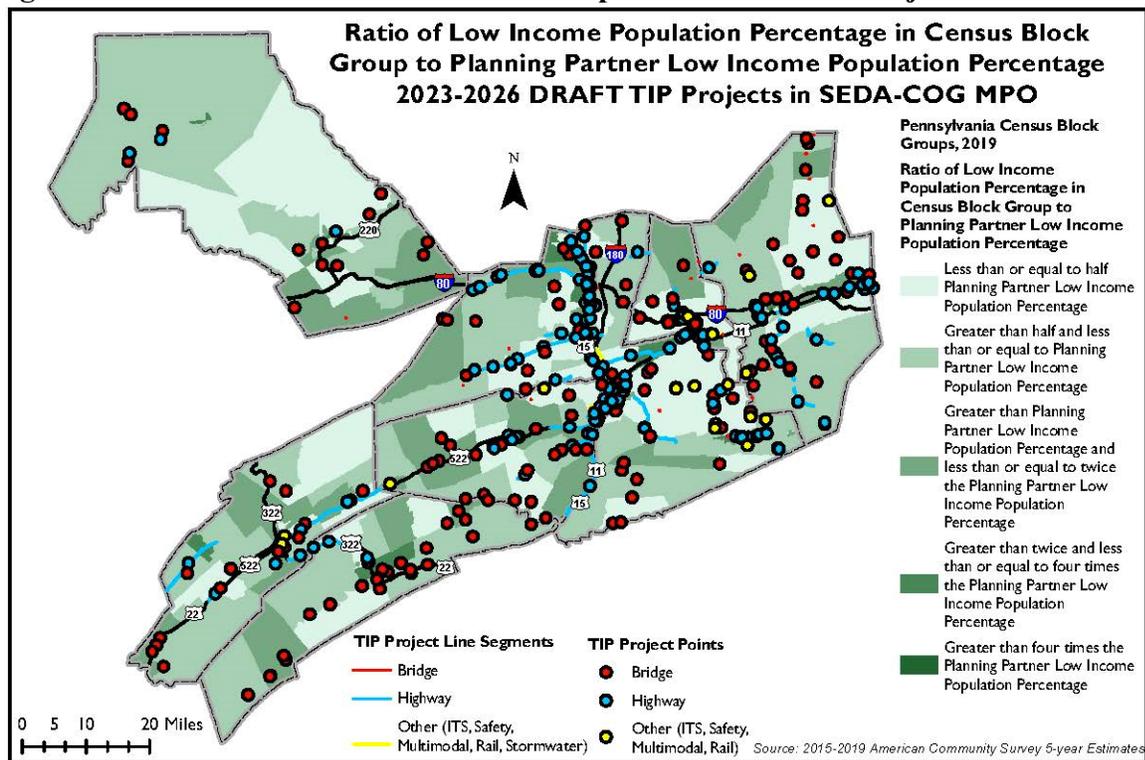


Figure 14: Concentrations of Minority Populations with TIP Populations

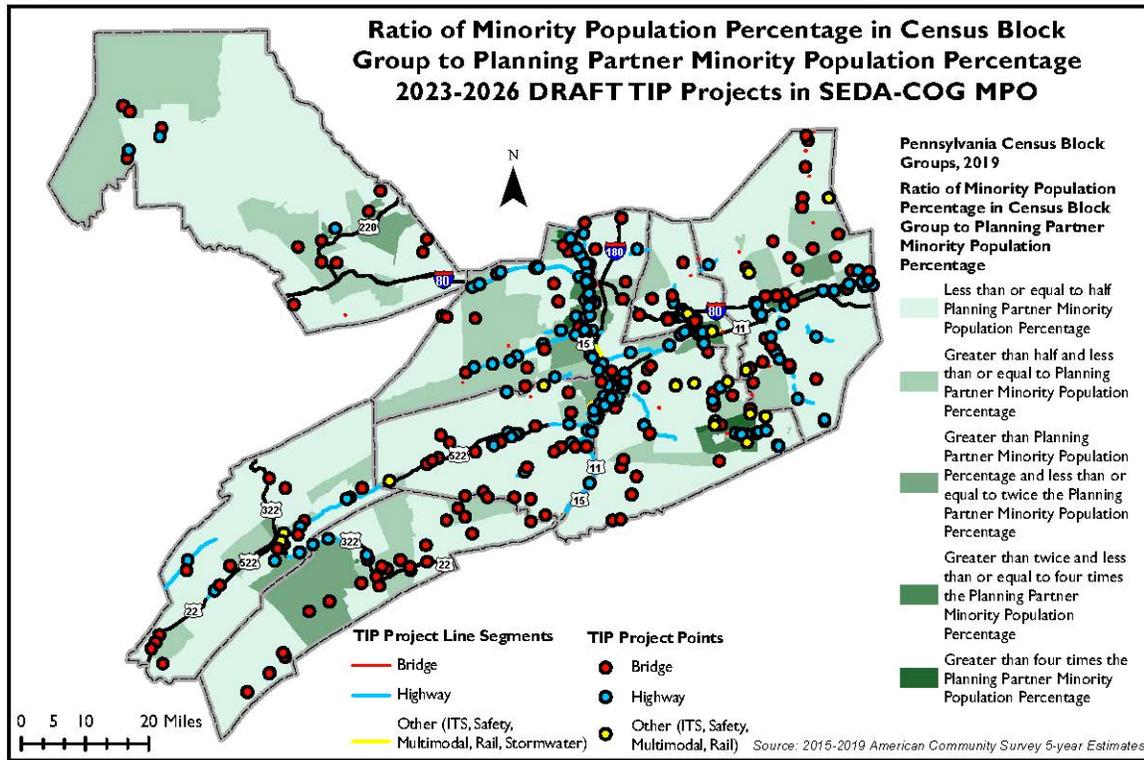


Table 12 is a categorization of all 2023 Draft TIP Projects. Each project was evaluated for proximity to low income or minority populations, as well as categorized as:

- Projects of Concern- High Potential for Adverse Impacts:
 - o New Right-of-Ways
 - o Roadway Expansion
- Lower Potential for Adverse Impacts/Potentially Beneficial:
 - o Roadway and Bridge Maintenance
- Low Potential for Adverse Impacts/Inherently Beneficial:
 - o Transit
 - o Bike/Ped
 - o Safety
 - o Studies

Table 12 also uses a gradient color scheme for low-income and minority indications. The color scheme corresponds to the mapping just above of the project distribution.

Table 12:

Project	County	Project Title	Minority	Low Income	High/Medium/Low Impact
3763	Clinton	T-537 over Fishing Creek			Medium
3840	Clinton	Rauchtown Bridge			Medium
3850	Clinton	SR 1001 Improvements			High
69038	Clinton	Bridge over Laurel Run			Medium
85149	Clinton	SR 0880 Rauchtown Cr II			Medium
93356	Clinton	Big Fishing Creek Br #3			Medium
101535	Clinton	Bridge over Long Run			Medium
110355	Clinton	2022 Bridge Preservation			Medium
112744	Clinton	Sulphur Run BOX			Medium
113133	Clinton	SR 120 over Dry Run			Medium
114298	Clinton	SR 120 West Port Fill Sli			Medium
114972	Clinton	SR 120 Slide Restoration			Medium
117159	Clinton	SR 4001 ov Summerson Run			Medium
5375	Columbia	T-373 over Roaring Creek			Medium
5635	Columbia	SR 487 ov Tb Roaring Crk			Medium
78825	Columbia	SR 4049 over W Branch Fis			Medium
82774	Columbia	SR 1020 over Pine Creek			Medium
88034	Columbia	SR 2005 over Roaring Cree			Medium
88051	Columbia	SR 1020 over Fishing Cree			Medium
88777	Columbia	SR 4008 ov Tb Fishing Crk			Medium
88803	Columbia	SR 487 over Tributary Roa			Medium
93643	Columbia	SR 1001 over Tributary to			Medium
98396	Columbia	SR 1012 over Tributary to			Medium
98398	Columbia	SR 1013 over Stony Brook			Medium
98400	Columbia	SR 1014 over Tributary to			Medium
98483	Columbia	Catawissa Crk. to SR 2009			Medium
98506	Columbia	SR 42 to Airport Rd			Medium
98941	Columbia	SR 254 ov Tb Fishing Crk			Medium
99404	Columbia	Briar Cr Boro to Berwick			Medium
100443	Columbia	Roaring Cr to Southern Dr			Medium
103011	Columbia	SR 487 over Abandoned RR			Medium
103833	Columbia	T-557 over Little Fishing			Medium
106181	Columbia	SR 239 over Fishing Creek			Medium
107019	Columbia	Adjacent Box Beam Bridge			Medium
107105	Columbia	SR 11 to SR 339			Low
107106	Columbia	SR 11 to Frost Valley Rd			Low
107107	Columbia	Frost Valley Rd to School			Low
107111	Columbia	Reagans Alley to SR 11			Medium
107112	Columbia	SR 61 to Midvalley Rd			Low

107113	Columbia	Montour Co to White Hall			Medium
107116	Columbia	Briar Cr to SR 1025			Medium
107118	Columbia	SR 42 to Columbia Co Main			Medium
109577	Columbia	I-80 Bridge Piers Rehab			Medium
109587	Columbia	SR 339 from Smith Hollow			Medium
114157	Columbia	SR 1027 over Tributary of			Medium
114231	Columbia	SR 4016 over Black Run			Medium
116203	Columbia	Park Blvd to Luzern Co			Low
116356	Columbia	Park St to Shaffer Rd (SR			Low
116528	Columbia	Martzville to SR 1025			Low
117137	Columbia	Poor House Rd to White Ch			Medium
117139	Columbia	Gaswell Rd to Roaring Cr			Medium
117495	Columbia	T-316 over Mugser Run, C			Medium
117566	Columbia	SR 11 AND SR 225 Bridge P			Medium
117567	Columbia	SR 93 over North Branch o			Medium
117568	Columbia	SR 42 AND 93 over North B			Medium
117576	Columbia	SR 4020 over Green Creek			Medium
117577	Columbia	SR 2001 over Roaring Cree			Medium
117840	Columbia	SEDA-COG HFST			Low
4096	Juniata	Mahantango Creek Bridge			Medium
4160	Juniata	Stoney Run Bridge			Medium
4190	Juniata	Bridge over NS Railroad			Medium
69423	Juniata	2023 SEDACOG Bridge Prese			Medium
69512	Juniata	SR 0850 Little Laurel Run			Medium
85170	Juniata	SR 0850 over Trib. Tuscar			Medium
85176	Juniata	SR 0075 over Trib Tuscaro			Medium
85178	Juniata	SR 0075 over Trib Tuscaro			Medium
85183	Juniata	SR 0333 over Trib Juniata			Medium
85187	Juniata	SR 2002 over Trib. Doe Ru			Medium
85191	Juniata	SR 3002 over Locust Run			Medium
85206	Juniata	SR 3023 over Tuscarora Cr			Medium
93721	Juniata	Trib Stony Run			Medium
105566	Juniata	SR 35 Stop 35 to Sheetz A			Medium
109717	Juniata	SR 2003 over Doe Run II			Medium
112751	Juniata	Trib Cocolamus Creek BOX			Medium
112752	Juniata	Trib Stony Run BOX			Medium
113143	Juniata	SR 3008 over Trib Tuscaro			Medium
113146	Juniata	SR 3019 over Doyle Run			Medium
114302	Juniata	2024 SEDA-COG Bridge Pres			Medium
116886	Juniata	2025 SEDA-COG Bridge Pres			Medium
116889	Juniata	2027 SEDA-COG Bridge Pres			Medium
111074	Juniata	River Rd RR Warning Device			Low
4551	Mifflin	SR 1002 over Dry Creek			Medium
4582	Mifflin	Lewistown Narrows Rehab			Medium

69387	Mifflin	Long Hollow Run Bridge			Medium
72767	Mifflin	Lewistown to Co. Line Bet			Medium
81491	Mifflin	Co. Line to Belleville			Medium
85276	Mifflin	Br Long Hollow II			Medium
85290	Mifflin	SR 0522 over Jacks Creek			Medium
85299	Mifflin	Lewistown Bridge			Medium
85300	Mifflin	Lewistown Bridge II			Medium
91608	Mifflin	SR 1012 Laurel Run Br			Medium
93314	Mifflin	McVeytown Strodes Mills			Medium
93316	Mifflin	Valley St. Betterment			Medium
95971	Mifflin	T-439 ov Kishacoquillas			Medium
105922	Mifflin	SR 22 ov Branch Long Holl			Medium
110175	Mifflin	T-420 over Kish Creek			Medium
112745	Mifflin	Branch Jacks Creek BOX			Medium
112749	Mifflin	Branch Kishacaquillas Cre			Medium
113151	Mifflin	SR 2008 over Br Jacks Cre			Medium
113153	Mifflin	SR 22 over Abandoned RR			Medium
113155	Mifflin	SR 3017 over Trib Juniata			Medium
114010	Mifflin	SR 522 Betterment			Medium
114048	Mifflin	Kish Pike RR Device Insta			Low
114303	Mifflin	2025 SEDA-COG Bridge Pres			Medium
114470	Mifflin	PA 103 Slide Area			Medium
116799	Mifflin	SR 22 over Wakefield Run			Medium
116986	Mifflin	Tributary Jacks Creek BOX			Medium
117782	Mifflin	Walnut St RR Device Insta			Low
6303	Montour	T-396 over E Branch Chill			Medium
93524	Montour	SR 54 over Stony Brook			Medium
93650	Montour	SR 3007 over Tributary to			Medium
98507	Montour	SR 642 over Mause's Creek			Medium
98610	Montour	Cherry St to Byrd Ave			Medium
98991	Montour	SR 54 Wbl ov Mahoning Crk			Medium
100483	Montour	SR 54 from SR 254 to SR 3			Medium
103841	Montour	T-308 over Beaver Run Bri			Medium
103853	Montour	SR 54 Corridor Safety Imp			Low
105525	Montour	I-80 West Bound from Stum			Medium
105527	Montour	I-80 West from Klondike R			Medium
106671	Montour	T-392 over Mud Run Bridge			Medium
107128	Montour	SR 54 under Market Street			Medium
112358	Montour	I-80 ITS Camera #1 Danvil			Low
115544	Montour	1500ft W of Montour St to			Medium
115547	Montour	North'd Co to 1500ft W of			Medium
116227	Montour	Ferry St to Cherry St			Medium
116307	Montour	Northumberland Co to Bald			Low
117036	Montour	SR 2008 Bloom Road Bike L			Low

117506	Montour	T-412 over Sechler Run			Medium
6615	Northumberland	SR 4020 over Little Shamo			Medium
6667	Northumberland	SR 4018 over Unnamed Trib			Medium
6725	Northumberland	SR 901 over SEDA-COG Rail			Medium
78935	Northumberland	SR 225 over Mahantango Cr			Medium
85622	Northumberland	SR 405 ov Tb Delaware Run			Medium
85623	Northumberland	SR 147 over Tributary to			Medium
87909	Northumberland	SR 54 from Montour County			Medium
87944	Northumberland	SR 61 from Lancaster Swit			Medium
87994	Northumberland	SEDA-COG Scour Contract			Medium
88778	Northumberland	SR 54 over Shamokin Creek			Medium
88798	Northumberland	Substructure Contract			Medium
93642	Northumberland	T-802 over S Branch of Ro			Medium
97550	Northumberland	SR2024 ov SBr Roaring Crk			Medium
97593	Northumberland	SR 54 from SR 901 to Locu			Medium
97679	Northumberland	W Br Susq Rvr to Milton			Medium
97708	Northumberland	SR 54 from south of SR 90			Medium
98531	Northumberland	SR 1007 over Tributary of			Medium
98540	Northumberland	SR 4004 over Tributary N			Medium
98674	Northumberland	SR 147 to Housels Run			Medium
99006	Northumberland	SR 61 over Dark Run			Medium
99009	Northumberland	SR 61 over SR 2029 AND 90			Medium
99176	Northumberland	SR 11 from SR 147 to C St			Medium
99177	Northumberland	SR 1024 to Montour County			Medium
99391	Northumberland	Kulpmont to Lancaster Swi			Medium
102810	Northumberland	CSVT to SR 11			High
103917	Northumberland	T-696 over Plum Creek			Medium
103928	Northumberland	8th St over Shamokin Crk			Medium
109833	Northumberland	SR 147 (CSVT Gap) from E			Medium
110224	Northumberland	SR 61 from 5th St to Dark			Medium
110829	Northumberland	SR 61 - Paxinos Drainage			Low
111352	Northumberland	SVRR RRX Northumberland C			Low
111760	Northumberland	SR 44 to Lycoming Co			Medium
113177	Northumberland	T-633 over Muddy Run			Medium
113695	Northumberland	SR 4010 from Front St to			High
114101	Northumberland	Bridge Painting Off Syste			Low
114134	Northumberland	SR 1016 over Muddy Run			Medium
114142	Northumberland	SR 3003 over Mouse Creek			Medium
114158	Northumberland	SR 4012 over Deicks Run			Medium
114175	Northumberland	SR 4004 over Tributary of			Medium
115084	Northumberland	Bottle Run Rd to SR 54			Low
115507	Northumberland	Water St to SR 147			Medium
115509	Northumberland	Pine St to Montour Co			Low
115579	Northumberland	North'd SR 254 Grind AND			Medium

115583	Northumberland	Shamokin Cr to Church St			Medium
115584	Northumberland	Church St to Shikellamy A			Medium
115656	Northumberland	Epoxy Overlay BOF SEDA-CO			Medium
115821	Northumberland	SR 225 to SR 61			Low
116005	Northumberland	SR 61 to Ash St			Medium
116221	Northumberland	Warrior Run MTF			Low
116314	Northumberland	SR 45 to Old Rt 45 (T571)			Medium
116833	Northumberland	Ferry Ln to Walnut St			Medium
117570	Northumberland	SR 45 AND 1014 over West			Medium
117608	Northumberland	SR 3018 over Mahantango C			Medium
117615	Northumberland	SR 11 over W Branch Susqu			Medium
6797	Snyder	SR 3016 over Aline Creek			Medium
6860	Snyder	T-481 over Tuscarora Crk			Medium
6886	Snyder	US 522 over Tributary to			Medium
6899	Snyder	SR 522 over Beaver Creek			Medium
6902	Snyder	SR 522 over Tb Middle Crk			Medium
93648	Snyder	SR 2007 over Tributary to			Medium
98548	Snyder	SR 1011 over Tb Penn's Cr			Medium
98578	Snyder	SR 3010 over Tributary to			Medium
98885	Snyder	SR 204 to SR 11			Medium
98887	Snyder	SR 1023 to SR 1017			Medium
99120	Snyder	SR 35 ov Tb Middle Creek			Medium
99121	Snyder	SR 35 over Tb Middle Cree			Medium
99241	Snyder	SR 11 from Ulsh Road to P			Medium
104616	Snyder	SR 522 from Willow Ave to			Medium
106278	Snyder	SR 11 North Bound from Pe			Low
106279	Snyder	Penns Creek to SR 522 SB			Low
109837	Snyder	Dry Run to Union Co			Medium
113404	Snyder	Dinius Ave to Water Tower			Medium
113787	Snyder	Roosevelt Ave to SR 15/11			Medium
114097	Snyder	Epoxy Overlay BOF SEDA-CO			Medium
114143	Snyder	SR 3006 over Trib of West			Medium
114176	Snyder	SR 3016 over Tributary of			Medium
115551	Snyder	SR 11 to Union Co			Low
115553	Snyder	Brosius Hill Rd to Sunny			Medium
116339	Snyder	Old Trail Rd to App Rd			Medium
116340	Snyder	Gregor Hill Ln to Spring			Medium
116341	Snyder	Smalsh Barrick Rd to Moun			Low
116342	Snyder	Paxtonville Rd to Mill St			Medium
116343	Snyder	Penn Twp Line to Market S			Low
116538	Snyder	Front St to Market St			Medium
117579	Snyder	SR 4016 over N Branch Mid			Medium
117704	Snyder	T-487 over Tributary to P			Medium
72352	Union	T-421 over White Deer Hol			Medium

87904	Union	SR 45 from Kaiser Run Rd			Low
97551	Union	SR 1011 to North'd Co WB			Medium
97720	Union	SR 3007 to Buffalo			Medium
97746	Union	JPM Rd to Col John Kelly			Low
98735	Union	SR 192 Union County Bridg			Medium
98772	Union	SR 1003 over Tributary to			Medium
98786	Union	SR 2003 over Tributary to			Medium
98826	Union	SR 3006 over Cold Run			Medium
98828	Union	SR 3014 over Turkey Run			Medium
98903	Union	Front St to Stein Ln			Medium
99141	Union	SR 1011 over Tributary to			Medium
99253	Union	N of I-80 to White Deer Cr			Medium
99273	Union	White DeerTwp to Allenwood			Medium
99407	Union	PA44 to Lycoming Co Line			Medium
105516	Union	I-80 West Bound from Unio			Medium
108425	Union	Joe Rd to SR 1010			Medium
110231	Union	Mile Run to SR 1010 EB			Medium
110337	Union	T-357 ov N Branch of Buff			Medium
110599	Union	Ikeler St. to T-387 Hafer			Medium
110828	Union	SR 45 to Orchard Ln			Medium
113459	Union	T-319 over Penns Creek (U			Medium
113612	Union	I-80 WB from Mile Run to			Medium
113788	Union	Bull Run to Northumberland			Medium
114379	Union	Snyder Co line to SR 304			Low
115562	Union	Winfield to Martin St			Medium
115565	Union	S. Hill Rd to Columbia Av			Medium
116133	Union	SR 15 West Branch Hwy to			Low
116344	Union	Haffer Rd to Zeigler Rd			Low
116349	Union	Hardee's Dr to Bull Run			Low
116350	Union	Johnson Mill Rd to SR 15			Low
116351	Union	SR 1008 to Deitrich Rd			Low
116352	Union	Zeigler Rd to SR 1004			Medium
116353	Union	SR 1004 to SR 1008			Medium
116354	Union	Penn St to Kaiser Run Rd			Low
117418	Union	SR 15 to Susquehanna Rive			Low
117420	Union	JPM RD to 3rd St			Medium
117901	Union	West Shore RRR, SR 1011 a			Low

The Environmental Justice Benefits and Burdens Analysis identifies where high concentrations of minority and low-income populations reside in the SEDA-COG MPO region. The analysis is accomplished through mapping and tabular summaries to indicate where these populations exceed the regional averages, and how those populations may be impacted by current transportation conditions and proposed transportation spending. Based on the distribution of current TIP funding and the analysis of asset conditions, there do not appear to be disparities in investment linked to concentrations of minority or low income populations.

Overall, minority populations within the SEDA-COG MPO region have increased to (7.3%) in the 2015-2019 ACS data and – aside from the Census block groups influenced by incarcerated populations – are concentrated in the more densely populated cities, boroughs, and towns. Low-income populations represent a larger portion of the region (13.05%) and are concentrated in the more densely populated areas of the region, but also occur in the more secluded rural areas of each county. The locations of these populations demonstrate the need for the SEDA-COG MPO to consider alternative travel modes in these locations, as minority and low-income populations are more likely to not have access to a vehicle.

The SEDA-COG MPO will continue to evaluate changing conditions coming with the CSVT Project, as it dominates much of the funding in the TIP. In 2021, a special impact study was completed in conjunction with the Williamsport Area Transportation Study (WATS) MPO, to evaluate the impacts along the CSVT corridor. With the help of Michael Baker International, the study outlined a series of implementation steps that can be completed as the CSVT begins to open. To find out additional information on the study, please visit lyco.org/CSVT.

The SEDA-COG MPO has considered the needs of traditionally underserved populations in the development of the TIP by providing opportunities for public comment and completing this analysis to show geographically what projects are going to impact these populations. Upon examination of Table 12, there is only one project that is shown to have a high impact on a high-density area of minority populations. Through this analysis the SEDA-COG MPO was better able to highlight where areas of low-income and minority populations are located and what projects will impact them the most. This process allows better communication during the planning and construction process to mitigate the impacts.