

Prepared for:

Lackawanna-Luzerne Transportation Study MPO

Lackawanna County Regional Planning Commission 135 Jefferson Avenue, 2nd Floor | Scranton, PA 18503

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Background

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

In 2000, an Executive Order was signed by President Bill Clinton titled "Improving Access to Services for Persons with Limited-English Proficiency." A person with Limited-English Proficiency (LEP) refers to an individual for whom English is not their primary language and who has a limited ability to read, write, speak, or understand the English language. The Executive Order established that recipients of federal funds must provide meaningful access to Limited-English Proficient (LEP) individuals and thus, not discriminate on the basis of national origin. Pursuant to the Executive Order, the Department of Justice issued LEP Guidance in 2002, 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 compliance processes set forth in the Department of Justice LEP Guidance. The analysis serves as a technique for organizations to examine the LEP persons in their service area and develop a cost-effective and meaningful plan for communications with those populations.

The Four Factors are as follows:

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

Factor 1 - Number & Proportion of LEP Persons Encountered

Factor 1 evaluates the number of LEP persons served and the concentration of LEP persons in the service area population. In the case of the LLTS MPO, the service area population is the total population within the MPO (Lackawanna and Luzerne counties) (see **Figure 1**).

Lackawanna-Luzerne Transportation Study LACKAWANNA LUZERNE REGION **SCRANTON** 6 DICKSON **WILKES-BARRE** 347 FELL (107) PITTSTO 106 524 438 309 LAFLIN 247 107/ 407 632 632 307 307 [11] 115 247 HANOVER ASHLEY 307 435 92 0 LEHMAN 435 29 309 [11] 115 239 309 PENN LAKE PARK 437 **HAZLETON** SALEM 93 93 (940) FREELAND 93 309 924 940 93 BLACK 93 924 HAZLE 424 434 434 Interstate 0 5 10 Miles **US Highway** PA State Routes **SR State Routes** McCORMICK TAYLOR Municipalities Source: PennDOT, RMS Roads

Figure 1. LLTS MPO Region

Language characteristics within the MPO region were identified using the U.S. Census Bureau's 2009-2013 American Community Survey (ACS) data. The dataset for "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" (Table B16001) was compiled and mapped at the tract level. Individuals are characterized as speaking English "very well" or "less than very well." For the purposes of 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 LLTS MPO region includes the institutionalized populations of two state penitentiaries located in Luzerne County. LLTS MPO does not provide services to these institutionalized persons. However, institutionalized populations could not be identified and specifically removed from the analysis. Therefore, the data summaries and mapping provided in this document still include the institutionalized populations.

Total LEP Population in the LLTS MPO Region

Table 1 summarizes the total population and LEP population of All Language Groups in the LLTS MPO Region, with comparison to the Commonwealth of Pennsylvania as a whole. Of the region's total population age 5 or older, about 18,500 persons or 3.6% of the total population are estimated to have Limited-English Proficiency. This is slightly below the statewide percentage of the population with Limited-English Proficiency.

Table 1. Total Population and LEP Population in the LLTS MPO Region vs. Pennsylvania

	LLTS MPO Region			Pennsylvania		
	Population Estimate	% of Total Population		Population % of To Estimate Popula		
Total Population Age 5 or Older	507,318			12,008,403		
Total LEP Population All Language Groups Speak English "less than very well"	18,458	3.6%		468,327	3.9%	

Source: U.S. Census Bureau: American Community Survey (2009-2013), 5 Year Estimates. Table B16001.

Figure 2 illustrates the concentration (percentage of total population) of LEP persons. The LEP concentrations are generally higher in the more urban areas of the region in and around Hazleton, Scranton, and Wilkes-Barre. The percentage of the population that speaks English "less than very well" is approximately equal in Lackawanna County and Luzerne County (see **Table 2**).

Lackawanna-Luzerne Transportation Study PERCENT OF POPULATION WITH LIMITED ENGLISH PROFICIENCY **SCRANTON WILKES-BARRE HAZLETON Limited English Proficiency** 5 0 10 Miles 0 - 1.7% 1.8 - 3.5% -3.6% Regional Average 3.6 - 5.4% 5.5 - 7.2% Source: U.S. Census Bureau, American Community Survey, 2013 5-year Estimates. Data Universe: Population 5 years and over Notes: Speak English less than "very well" McCORMICK TAYLOR 7.3 - 34.2%

Figure 2. LLTS MPO Concentration of Persons with Limited-English Proficiency

Table 2. LEP Persons for All Language Groups by County

	Total	All Language Groups LEP			
County	Population 5 Years	Speak English "less	% of Total		
	and Over	than very well"	Population		
Lackawanna County	202,825	7,099	3.5%		
Luzerne County	304,493	11,266	3.7%		
Total	507,318	18,365	3.6%		

Source: U.S. Census Bureau: American Community Survey (2009-2013), 5 Year Estimates. Table B16001

Largest LEP Language Groups in the LLTS MPO Region

Table 3 summarizes population data for the five (5) most populous LEP language groups in the LLTS MPO Region. Comparisons to the statewide data are provided for the same language groups. The Spanish language group is by far the largest LEP population in the region. Beyond these "Top 5" populations, the region is also home to LEP persons who speak the following (in order by decreasing population): Chinese (461); Russian (363); other Indo-European languages (348); Arabic (260); other Pacific Island languages (258); Portuguese or Portuguese Creole (245); French (218); other Slavic languages (226); and other Asian languages (208). The LEP population for each other language group not listed here is 200 or fewer.

Table 3. Top Five LEP Populations in the LLTS MPO Region vs. Pennsylvania

	LLTS MPO Region		Pennsylvania		
	Population Estimate 5 Years and Over	% of Total Population		Population Estimate 5 Years and Over	% of Total Population
Total Population	507,318			12,008,403	
LEP Language Groups – Speak English	n "less than very well"				
Spanish	11,688	2.30%		204,631	1.70%
Other Indic languages	784	0.15%		10,739	0.09%
Gujarati	763	0.15%		8,236	0.09%
Italian	763	0.15%		12,671	0.07%
Polish	531	0.10%		7,700	0.06%

Source: U.S. Census Bureau: American Community Survey (2009-2013), 5 Year Estimates. Table B16001

Geographic Distribution of LEP Populations

Distributive mapping of the ACS data was prepared at the tract level to develop a better understanding of the LEP populations in the LLTS MPO region, potentially qualifying for "Safe Harbor" treatment – namely the Spanish LEP population.

Figures 3 and 4 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 located in the more urbanized areas of the MPO region, with higher populations in the following locations:

- Hazleton
- Wilkes-Barre
- Scranton

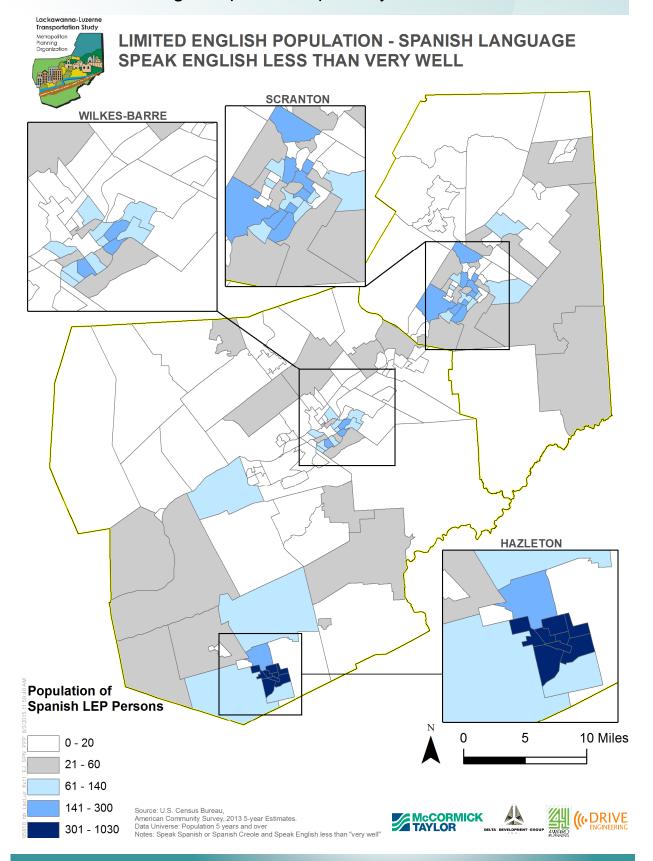
Table 4 summarizes the Spanish LEP populations by county. The higher populations are in the more urbanized areas of the MPO. Higher concentrations of Spanish LEP persons are noted in the areas of Hazleton, West Hazleton, Hazle Township, Wilkes-Barre, and Scranton.

Table 4. Spanish Language Group LEP Persons by County

	Total	Spanish Language LEP		
County	Population	Speak English "less than very well"	% of Total Population	
Lackawanna County	202,825	3,302	1.63%	
Luzerne County	304,493	8,386	2.75%	
Total	507,318	11,688	2.30%	

Source: U.S. Census Bureau: American Community Survey (2009-2013), 5 Year Estimates. Table B16001

Figure 3. Spanish LEP Population by Census Tract



Lackawanna-Luzerne Transportation Study PERCENT OF POPULATION WITH LIMITED ENGLISH PROFICIENCY WHO SPEAK SPANISH **SCRANTON WILKES-BARRE HAZLETON** Limited English

Figure 4. Spanish LEP Concentration by Census Tract

-2.3% Regional Average

Source: U.S. Census Bureau, American Community Survey, 2013 5-year Estimates. Data Universe: Population 5 years and over Notes: Speak Spanish or Spanish Creole and Speak English less than "very well"

Proficiency who Speak Spanish

> 0 - 1.1% 1.2 - 2.2%

2.3 - 3.4% 3.5 - 4.5%

4.6 - 33.6%

10 Miles

5

McCORMICK TAYLOR

Safe Harbor Provision

The Safe Harbor Provision, as defined in the Department of Transportation's LEP Guidance, is the most prevalent guideline used to establish when it is appropriate to provide language-specific services and what those services should entail. The provision provides a level of certainty for recipients to know at what point they may be considered to be in compliance with the federal requirements related to LEP. Specifically, the guidance provides, "If a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with the recipient's written translation obligations under Title VI." The LLTS MPO will provide written translation of "vital documents" for each LEP population that exceeds the Safe Harbor thresholds for a given area. 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.

Safe Harbor Triggers

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

Considering the LLTS MPO region as a whole (i.e., the "service area"), the Safe Harbor Provision is potentially¹ triggered for the Spanish language group (see **Table 3**). The total LEP population for this group exceeds the 1,000 person threshold, even though the concentration of the population (at the regional level) falls well below the 5% threshold.

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 [LLTS 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, LLTS MPO has designated the following as "vital documents" for translation:

- Notification of Language Services (Appendix B);
- Title VI Notice to Beneficiaries (Appendix C);
- Title VI Complaint Form (**Appendix D**);
- Title VI Complaint Form Procedures (**Appendix E**)
- Executive Summaries of Primary Plans and Documents
 - Long-Range Transportation Plan
 - Public Participation Plan
 - o Transportation Improvement Program

When a targeted outreach activity is triggered by the presence of an LEP population (see Chapter 4 of the Public Participation Plan), written materials will be made available in the LEP language according to the Safe Harbor Provision and the Public Participation Plan.

¹ This evaluation concludes that the Safe Harbor Provision is "potentially" triggered, since it does not attempt to discern the total LEP population from those "eligible to be served or likely to be affected or encountered."

It should be noted that the LLTS MPO will provide translation of documents upon request, and will also provide translation as appropriate in other languages (in addition to the Spanish translations described above) based on specific plans or projects and the impacts they may have in areas where LEP populations are present.

Factor 2 - Frequency of Contact with LEP Persons

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

LLTS MPO staff was not aware of any projects or plans within the region that required focused outreach to non-English speaking persons. Even though the need has not arisen to date, the MPO desires to be prepared to assist LEP persons when they come in contact with the MPO's program and planning efforts. With this LEP Plan, the LLTS MPO is formally appropriating tools and training its staff for recognizing LEP persons, identifying their languages, and serving LEP persons, when the need arises. The MPO has developed an Employee Training Manual to facilitate staff training and create a central source of information related to LEP. The manual includes information about Title VI and LEP requirements; LEP in the LLTS area; resources for phone, in-person, and written translation; and LEP program evaluation techniques.

Factor 3 - Nature and Importance of the Program

The LLTS MPO is primarily a planning organization for transportation investments in the region. The MPO does not provide direct assistance to individuals; and as such, does not directly impact the day-to-day life of residents in the region. The LLTS MPO staff is aware of the importance of identifying LEP populations near a project and the need for conducting thoughtful outreach. LEP individuals commonly rely on non-motorized modes, as well as roadside and off-road pedestrian and bike facilities for day-to-day transportation. So while the planning activities of the MPO may not have urgent or direct impacts for the public, they are important to the long-term mobility and livelihood of those residing in the region.

The planning activities of the MPO provide opportunity for public participation, and the MPO is appropriating tools and training that will serve LEP persons who wish to participate.

Factor 4 - Resources & Costs of Language Assistance Services

LLTS MPO is a small agency with limited capital resources to use for LEP services. The organization does have 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.

LLTS MPO has several staff members that answer phones. While none of the current staff are bilingual, many can recognize the Spanish language, and they have been trained on the protocols for dealing with requests for translation and interpretation and the relevant Title VI and LEP obligations of the organization.

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 LLTS MPO is responsible to take steps that ensure meaningful access to the services, information, and other important portions of their programs and activities for individuals who are Limited-English Proficient (LEP). This includes the development of a Language Assistance Plan (LAP), which establishes an implementation program for providing 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 serving LEP persons.

Consistent with the federal guidance, 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 formally addresses accommodations for LEP persons who read Spanish. Immediate assistance for Spanish interpretation and other languages may be provided if an available service can accommodate the language requested (e.g., on-demand telephone interpretation services, language identification card, local interpreters, etc.).

Language Assistance Tools

Notices and Advertisements

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

- Posting translated notices in local newspapers as part of legal ads and press releases
- Posting notices on the LLTS MPO website, which may be translated using Google Translate or another automated translation service
- Distributing written and email notices to interested parties, in their requested language

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

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

Language Identification Card

The Language Identification Card is a one-page tool that states, in a number of languages, "If you need an interpreter, please point to your language." The LEP person points to their language on the card to indicate their language. Each language is also identified in English at the right side of the page, so that an English-speaking person can accurately request interpretation services and engage an interpreter quickly. A sample Language Identification Card is provided in **Appendix F**.

This appendix also includes a Language Identification Survey from the U.S. Census Bureau, for use where the written survey version may be more efficient. The card and survey will be a part of the materials maintained 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 the LEP person while an interpreter or interpreter service is contacted. This tool is provided in **Appendix G**.

Telephone-Based Interpretation Service

The Commonwealth of Pennsylvania maintains a contract with a telephone-based (a.k.a, "on-demand") interpretation service and provides public agencies with access to the service, free of charge. With the increasing potential for interaction with LEP persons, the LLTS MPO is prepared to utilize this service. According to the MPO's minimal amount of interaction with LEP persons, this service should provide an adequate level of interpretation service for the MPO's needs.

Instructions for accessing the telephone-based service (phone number and access code) along with "helpful hints" for working with an over-the-phone interpreter are provided in **Appendix H**. The MPO staff, who interacts with a LEP person, calls the phone number and the operator will either assist in identifying the LEP person's language, or if the language is known, the language code may be entered directly. An interpreter will be connected, and the conversation can proceed in conference call or three-way call mode.

Translation Services for Written Material

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

The following are methods of providing written translation of documents:

Human-Translation Services

Human translation (i.e., non-automated translation provided by human, multi-lingual translators) services are available both locally in the LLTS 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, Babelfish)
Online automated translation services, such as Google Translate
(https://translate.google.com/), Bing Translator (https://translate.google.com/), or
Babelfish (https://www.babelfish.com/) provide on-demand translation among multiple
languages, as well as an application programming interface (API) that may be integrated into
existing webpages. As an implementation step of this plan, LLTS MPO intends to implement
Google Translate on the entire LLTS MPO website (new website planned to be implemented)

in 2016). Similar to other agency sites, icons, or hyperlinks that identify alternative languages and initialize Google

Translate would be added to the webpage. The function would automatically translate website text into the user's language of choice. In keeping with best practices for making web-based translation services accessible, LLTS MPO intends to implement code that shows icons for the largest five (5) LEP language groups in the LLTS MPO's service area.

Providing Notice

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 LLTS MPO committee meetings and periodic plan-specific public meetings for the Transportation Improvement Program, Long-Range Transportation Plan, Public Participation Plan, and Coordinated Human Services-Transit Transportation Plan.

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

The LLTS MPO will provide notice of availability of translation and/or interpretation services in legal ads, press releases, and website posts that announce or advertise a public meeting. The notice will be provided in both English and Spanish languages. The following sample text would be used and adapted, as necessary:

English:

"The content of this [advertisement / press release / posting] is available in alternative formats and other languages upon request by contacting the Lackawanna-Luzerne Transportation Study Metropolitan Planning Organization (LLTS MPO). Persons who plan to attend the announced [meeting / event / activity] and require language interpretation services and/or special accommodations under the American with Disabilities Act should contact the LLTS MPO at least five (5) business days prior to the [meeting / event / activity]. Contact the MPO by phone at (570) 963-6400 or by written letter addressed to Transportation Planning Manager, LLTS MPO 135 Jefferson Avenue, 2nd Floor, Scranton PA 18503.

Spanish:

"El contenido de este [anuncio / Comunicado de Prensa / contabilización] está disponible en formatos alternativos y otros idiomas a petición en la organizacion Lackawanna-Luzerne Transportation Study Metropolitan Planning (LLTS MPO). Las personas que planean asistir a la anunciada [evento / actividad de reunión] y que requieren servicios de interpretación de idiomas y / o alojamientos especiales en virtud de la Ley de Americanos con Discapacidades deben comunicarse con la LLTS MPO al menos cinco (5) días antes de la [reunión / evento / la actividad]. Comuníquese con la MPO por teléfono al (570) 963-6400, en carta escrita a gerente de planificación del transporte, LLTS MPO 135 Jefferson Avenue, 2nd Floor, Scranton PA 18503.

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

Identifying LEP Persons

As a starting point for providing language services, LEP persons must be identified or be provided with the opportunity to identify themselves. The following methods will be used situationally to accomplish the identification of LEP persons.

Language Identification Card

It is preferable that LEP persons "self-identify" themselves, as requested in the *Notice of Language* Services. LLTS MPO can utilize language identification cards at public meetings or other in-person venues (including the MPO staff offices) to identify an attendee's language. The attendee may simply point to their language on the card to indicate their language. A sample language identification card is included in **Appendix F**. 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. The MPO will maintain a Language Identification Card as standard material for the Welcome/Sign-In station.

Local Community Organizations and Contacts

Community groups or individuals that cater to Spanish-speaking persons provide an excellent conduit for facilitating participation and assisting LEP persons at meetings and other planning activities. A listing of known local community organizations and contacts is provided in **Appendix J**.

Written Communication

Contact through written communication includes both paper and electronic e-mail 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.

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, Babelfish, 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.

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. The response would be prepared in English and then translated into the language spoken by the LEP person. Since an accurate translation would be preferred, the contracted help of a translation service would be used to prepare the response.

Google Translate (or similar) 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.

Webpage

The LLTS MPO's website address is

http://www.luzernecounty.org/county/departments agencies/planning commission/lackawannaluzerne-metropolitan-planning-organization. The site provides a platform for disseminating information about its plans and programs, advertising upcoming activities, and providing contact information. Contact with the LLTS MPO through their website portal is one of the more likely contact points used by LEP persons, for many of the same reasons that non-LEP persons seek out a webpage. Information and answers to questions may be handled on a self-serve basis, which is typically more comfortable for most persons who are savvy with the internet and computer technology. For an LEP person, looking up a webpage is far less confrontational than telephone or in-person contact.

LLTS MPO has identified a need to establish a new, updated website. The website is anticipated to be functional and available to the public in 2016. As an implementation step of this plan, LLTS MPO intends to implement Google Translate on the entire new website. In addition, certain human-translated "vital documents" (identified previously) will be made available on the new website in Spanish. To verify the accuracy of the Google Translate tool for the Spanish language, an analysis of the Spanish Google Translate output for the new LLTS MPO webpage will be conducted. Although some translational issues will most likely be identified, it is anticipated that there will be no substantive issues that would inhibit a speaker of Spanish from understanding the implied meaning of the text.

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

- Adding the *Notice of Language Services* to the LLTS MPO webpage, with one or more links added in the navigation menu. The *Notice* would be displayed in Spanish and English.
- Adding a hyperlink to the Notice of Language Services adjacent to the Google Translate icon, when this tool is added to the webpage.
- Integrating the *Notice of Language Services* into the Google Translate tool, such that a new "popup" tab opens the first time a user activates Google Translate. The notice will display in Spanish and English.

Translation of Phone Calls & In-Person Requests

Phone and in-person interpretation is not specifically required as part of the LEP guidance and, the degree of interaction with LEP persons that is documented in the Four Factor Analysis does not indicate the need for the LLTS MPO to have extensive translation capabilities in-house; however, the potential for interaction with LEP persons is likely increasing and, preparation for these instances is appropriate. The MPO staff is equipped to meet such requests with the following techniques and resources.

Telephone calls to the LLTS MPO would likely go through the Lackawanna County and Luzerne County's planning offices. County staff (working in the same office as the LLTS MPO staff) who may be answering the phones will be advised to contact the MPO staff if any calls are received from persons speaking a language other than English.

Phone calls regarding language assistance services may be expected in reply to advertisements and other notices that request notification in advance of meeting. An LEP person who places a phone call to the LLTS MPO staff will, in all likelihood, be responding to an advertisement, web posting, or other announcement that solicits the call for a purpose and provides notice about the availability of language assistance. In this case, the LEP person would be at least partially informed about the MPO's commitment to make information available in other languages. A more expansive explanation of the specific language services provided and the expectations for how they are provided would be communicated once the language of the LEP person is identified and interpretation services are initiated.

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 described below.

Spanish and Other Spoken Languages

- <u>Language Identification Card</u> –The card allows an LEP individual to indicate their language in person (A sample Language Identification Card is included in **Appendix F**).
- On-Demand Interpretation Service This service is contracted by the Commonwealth and is provided free-of-charge to the MPO. Access to the current service is described in Appendix H. At each public meeting, the LLTS MPO will have at least one trained staff member designated to interact with the LEP person(s) in attendance. The staff member will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion. A cell-phone with speaker capability will be provided for this purpose. (Cell phone reception should be checked when evaluating venues as potential meeting sites.) All MPO staff will be trained in using the on-demand telephone interpretation service, in order to accommodate any in-person or call-in translation needs. Most interaction with the LEP person will occur with the interpreter's help.

LEP Coordination and Staff Training

As part of the LAP, the LLTS MPO has identified the processes and tools to be used in various contexts to provide language assistance services. A staff training program has been developed to train the staff who will be called upon to implement these processes and use the tools. The resources and tools have also been compiled into an *LEP Employee Resources Manual*.

Versions of these materials are maintained in electronic (PDF) and paper copy. Each staff member will receive a copy of the manual and be asked to complete the training presentation.

The training presentation was 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 training instructs employees on how to respond to LEP requests, and the process the MPO will put in place to ensure proper channels and procedures are followed. 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.

A paper copy binder will be created and maintained (one for each office – Lackawanna County and Luzerne County) in case a translation request is made, so that the language assistance materials can be accessed quickly and discretely when an LEP person calls or visits a county office.

Review Process for the LEP Plan and LAP

The LAP, along with the larger LEP Plan, will be monitored annually and updated periodically by a member of the LLTS MPO staff, in order to comply with the most current FHWA and FTA standards. A Self-Assessment Checklist is provided in **Appendix K** of this document and may be used as a template for the annual reviews.

An update to the LAP, which is provided in the appendix of the LLTS MPO Public Participation Plan, will be considered a "technical update" and would not require public comment and re-adoption by the MPO unless the update substantially changes the public participation process.

LEP Plan Self-Assessment Checklist

The LEP 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 LLTS 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.
- The Annual Report Summary draws from the Record of Interactions and serves as a onepage, 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 Checklist.

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

Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers

Federal Transit Administration Office of Civil Rights http://www.lep.gov/guidance/guidance Fed Guidance.html

Federal Government's Renewed Commitment to Language Access
Obligations under Executive Order 13166
http://www.lep.gov/13166/AG 021711 E0 13166 Memo to Agencies with Supplement.pdf

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

Federal Transit Administration

http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf

LEP Handbook, Federal Transit Administration http://www.fta.dot.gov/documents/LEP Handbook.doc

Overview of Title VI of the Civil Rights Act of 1964, Department of Justice http://www.justice.gov/crt/about/cor/coord/titlevi.php

Appendix

Appendix A Language Assistance Interview with LLTS MPO Staff

Appendix B Notification of Language Services (English and Spanish Versions)

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

Appendix D Title VI Complaint Form

(English and Spanish Versions)

Appendix E Title VI Complaint Form Procedure (English and Spanish Versions)

Appendix F Language Identification Card

Language Identification Survey

Appendix G "One Moment Please" Tool

Appendix H Telephone-Based Interpretation Service

Appendix I Translation & Interpretation Service Providers

Appendix J Community & Agency Contacts

Appendix K

Limited-English Proficiency Plan Self-Assessment Checklist

Suggested LEP Plan Performance Measures

Appendix A

Language Assistance Interview with LLTS MPO Staff

LLTS MPO Interview Questions July 8, 2015

Participants: Nancy Snee, LLTS MPO

Steve Pitoniak, LLTS MPO

Lugene Keys, McCormick Taylor (Interviewer)

Michelle Goddard, McCormick Taylor

Interview Summary (interview consisted of questions related to the Public Participation Plan in general; those specifically dealing with LEP/LAP are included here):

Q: In the past have block ads and posters notifying public of their rights under Title VI in English published? Have the notices been published in any other languages?

A: Block Ads are used to announce public comment periods for TIP and LRTP and other plan adoptions. Ads are placed in the Hazleton Spanish newspaper (in Spanish) and in the 3 local papers – Hazleton Standard Speaker; Wilkes Barre Citizen's Voice, and the Scranton Times Tribune. There is content that is in every ad – a sample of the ad and the language was sent to Michelle Goddard.

Q: Are there translation and/or interpretation providers in the region that have been used by LLTS MPO in the past?

A: Nancy Snee has a contact that will provide these services for her at no cost; but to date there has not been a need for this service. Additionally, PennDOT has translation services that are available to the MPO.

Q: Has LLTS MPO ever received any direct requests for translation services? If so, what Languages? A: No requests have been received to date.

Q: Are there any known plans or projects (other than public transit) in the region that have had specific, focused outreach to non-English-speaking persons or communities?

A: There are no known current plans or projects that require focused outreach to non-English speaking persons.

Appendix B

Notification of Language Services (English and Spanish Versions)

Notice of Language Services

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

By Phone

If you wish to call the LLTS MPO, please call (570) 963-6400 or (570) 825-1564 and request your preferred language. If the person answering your call cannot understand your request, he or she will ask you to wait a moment while a telephone-based interpretation service is contacted to assist in the conversation. Interpretation is available for many different languages, and is provided free of charge. Please be patient while we discover your language and bring the interpreter on the line.

By Written Correspondence

When writing correspondence to the LLTS MPO, please write in your preferred language. Address paper correspondence to LLTS MPO, 201 135 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 or LLTS MPO, Suite 208, Penn Place, 20 North Pennsylvania Avenue, Wilkes-Barre, PA 18711. 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 LLTS MPO is committed to maintaining Spanish translations of vital documents, which encompass those that explain how to access the MPO's services (including language assistance services), complaint forms, and notification of rights. These translated documents are available in paper copy through the LLTS MPO offices.

Notificación de Servicios Lingüísticos

LLTS MPO ofrece servicios de interpretación de idiomas y traducción de documentos a petición. Si su idioma preferido no es el Inglés, porfabor dejenos saber su idioma para poder converser o mantener correspondencia con usted en ese idioma. A continuación se describe lo que puede esperar cuando usted interactúa con nuestro personal:

En persona

Si usted asiste a una reunión en persona, por favor acerquerse a la Recepción / Estación de Registramiento y afirme su idioma preferido. Si la persona no puede entender su petición, él o ella le mostrará una tarjeta de identificación de idioma. Por favor, apunte a su idioma preferido. La persona que ayudará le pedirá que espere un momento mientras que un servicio de interpretación telefónica, se pone en contacto para ayudar en la conversación. Interpretación está disponible para muchos idiomas diferentes, y se proporciona de forma gratuita. Por favor, sea paciente mientras traemos el intérprete en la línea.

Por teléfono

Si desea llamar a la LLTS MPO, por favor llame al (570) 963-6400 o al (570) 825-1564 y solicite su idioma preferido. Si la persona que contesta la llamada no puede entender su petición, él o ella le pedirá que espere un momento mientras que un servicio de interpretación telefónica, se pone en contacto para ayudar en la conversación. Interpretación está disponible para muchos idiomas diferentes, y se proporciona de forma gratuita. Por favor, sea paciente mientras descubrimos su idioma y traer al intérprete en la línea.

Por correspondencia escrita

Al escribir correspondencia a LLTS MPO, por favor escriba en su idioma preferido. La dirección para la correspondencia a LLTS MPO es la siguiente: LLTS MPO, 201 135 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 o a la siguiente dirección LLTS MPO, Suite 208, Penn Place, 20 North Pennsylvania Avenue, Wilkes-Barre, PA 18711. Traduciremos su correspondencia y luego le daremos una respuesta (si es posible y apropiado) en su idioma preferido, así como Inglés. Por favor espere hasta 45 días para recivir la respuesta traducida en su idioma.

Traducciones de documentos disponibles

LLTS MPO se compromete a mantener las traducciones al español y polaco de documentos vitales, los cuales explican cómo acceder a los servicios de MPO (incluidos los servicios de asistencia lingüística), hojas de reclamaciones, y la notificación de los derechos. Estos documentos traducidos están disponibles en copia impresa a través de la oficina de LLTS MPO.

Appendix C

Title VI Notice (English and Spanish Versions)

LACKAWANNA/LUZERNE TRANSPORTATION STUDY METROPOLITAN PLANNING ORGANIZATION (LLTS MPO)

NOTIFICATION OF PROTECTIONS TO THE PUBLIC OF RIGHTS UNDER TITLE VI AND INSTRUCTIONS ON HOW TO FILE A COMPLAINT/GRIEVANCE

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

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint. All complaints received are documented and investigated.

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

Title VI Compliance Officer Lackawanna County Regional Planning Commission 135 Jefferson Avenue, 2nd Floor Scranton, PA 18503 (570) 963-6400

Title VI Compliance Officer Luzerne County Planning Commission Suite 208, Penn Place 20 North Pennsylvania Avenue Wilkes-Barre, PA 18711 (570) 825-1564

http://www.luzernecounty.org/county/departments_agencies/planning_commission/lackawann aluzerne-metropolitan-planning-organization/mpo-plansdocuments

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

A Complainant may file a complaint directly with the Federal Highway Administration by filing a complaint with the Equal Opportunity Specialist, U.S. Department of Transportation, Federal Highway Administration, 228 Walnut Street, Room 508, Harrisburg, PA 17101-1720.

LACKAWANNA/LUZERNE ESTUDIOA DE TRANSPORTE ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (LLTS MPO) NOTIFICACIÓN DE PROTECCIONES AL PÚBLICO DE DERECHOS BAJO TÍTULO VI Y INSTRUCCIONES PARA PRESENTAR UNA QUEJA

LLTS MPO está comprometida asegurar que ninguna persona sea excluida de participar en sus servicios o negada los beneficios de sus servicios sobre la base de raza, color, discapacidad, edad, bajos ingresos financieros, origen nacional, o su abilidad limitada de hablar ingles. Ninguna person debe ser excluida de participar de sus servicios según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964, según enmendada.

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

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

Title VI Compliance Officer Lackawanna County Regional Planning Commission 135 Jefferson Avenue, 2nd Floor Scranton, PA 18503 (570) 963-6400

Title VI Compliance Officer Luzerne County Planning Commission Suite 208, Penn Place 20 North Pennsylvania Avenue Wilkes-Barre, PA 18711 (570) 825-1564

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

El demandante puede presenter una queja directamente con la Administración Federal de Carreteras mediante la presentación de una queja ante la Especialista de Oportunidades Iguales, U.S. Department of Transportation, Federal Highway Administration, 228 Walnut Street, Room 508, Harrisburg, PA 17101-1720.

Appendix D

Title VI Complaint Form (English and Spanish Versions)

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

The following information is necessary for processing your complaint. If you require assistance in completing this form, please contact the LLTS MPO Title VI Compliance Officer by calling (570) 963-6400 or (570) 825-1564. Please return the completed form to the LLTS MPO Title VI Compliance Officer at LLTS MPO, 135 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 or LLTS MPO, Suite 208, Penn Place, 20 North Pennsylvania Avenue, Wilkes-Barre, PA 18711. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Complainant Name:	Name of Individual Assisting Complainant:		
Complainant Address:	Assisting Individual Address:		
Complainant Phone:	Assisting Individual Phone:		
Complainant Alt. Phone:	Assisting Individual Alt. Phone:		
Which of the following describes the reason(s) the a			
Date(s) of alleged discrimination:			

Please provide a detailed description of the c information supporting your complaint (please	ircumstances of the incident(s), including any a e use additional pages as necessary).	additional
Please provide the name(s), title and address Complainant.	(if known) of the person who discriminated ag	ainst the
Please provide, if applicable, names and cont the alleged incident(s) or are perceived as pa	act information of people who may have knowl rties in the complained-of incident(s):	ledge of
Please list any other agency where complaint	has been filed:	
I affirm that I have read the above complaint information and belief.	and that it is true to the best of my knowledge,	
Complainant's Signature	Print Name of Complainant	Date
Assisting Individual Complainant's Signature	Print Assisting Individual Name	Date
Date Received:	Received By:	

LACKAWANNA/LUZERNE ESTUDIOA DE TRANSPORTE ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (LLTS MPO) Procedimiento de Queja del Título VI

LLTS MPO está comprometido con asegurar que ninguna persona, por motivos de raza, color, discapacidad, edad, bajos ingresos financieros, nacionalidad, idioma, o abilidad limitada de hablar ingles, sea excluida de participar o sea negada los beneficios de sus servicios, o ser sujeto a discriminación en sus programas o servicios, según lo previsto en el Título VI de la Ley de Derechos Civiles de 1964, según enmendada. Estos procedimientos se aplican a todas las quejas externas relacionadas con cualquier programa o actividad administrada por LLTS MPO y / o sus sub-receptores, consultores y contratistas, presentada bajo el Título VI de la Ley de Derechos Civiles de 1964 según enmendada, (incluyendo Empresas en Desventaja e Igualdad componentes de Oportunidad de Empleo), así como otras leyes conexas que prohíben la discriminación.

La siguiente información es necesaria para el procesamiento de su queja. Si necesita ayuda para completar este formulario, por favor póngase en contacto con LLTS MPO Titulo VI Oficial de Cumplimeinto at number telefonico (570) 963-6400 or (570) 825-1564. Por favor devuelva el formulario complete al Oficial de Cumplimiento de LLTS MPO Titulo VI at LLTS MPO, 135 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 or LLTS MPO, Suite 208, Penn Place, 20 North Pennsylvania Avenue, Wilkes-Barre, PA 18711. Quejas del Título VI deben ser presentadas dentro de 180 días calendario a partir de la fecha de la supuesta discriminación.

Nombre del Demandante:	Nombre de la Persona Ayudando el Demandante
Dirección del Demandante:	Dirección del Ayudante:
Número de Teléfono del Demandante:	Número de Teléfono del Ayudante:
Número de Teléfono Alternativo del Demandante:	Número de Teléfono Alternativo del Ayudante:

Cuál de los sig círculo)	guientes	opcione	es desc	ribe la ca	usa de la supi	uesta discrimina	ción? (Márque	e con un
Raza	Edad	Color	Sexo	Idioma	Nacionalidad	Discapacidad	Represalias	Otro
Fecha(s) de Ir	ncidente	:						
	e LLTS ir	nvolucra	dos si s	e conoce	n. Explique lo	Proporcione los que pasó y quié		
Por favor, indi contra de la d			s), y el t	ítulo y di	rección (si se d	conoce) de la pe	rsona que dis	crimina en
						oce) de la persor omo partes de la		
Por favor escr	iba cual	quier oti	ra agen	cia donde	e una denunci	a haya sido pres	sentada:	
Afirmo que he y la creencia:	e leído lo	s cargos	anterio	ores y qu	e es fiel a lo m	ejor de mi cono	cimiento, la in	formación
Firma del Den	nandant	ce	Nomb	re del De	emandante (en	letras legibles)	Fech	na
Firma del Ayu			Nomb	re del Ay	udante (en leti	,	Fech	na
Fecha de Rec	epcion:				Recib	ido por:		

Appendix E

Title VI Complaint Form Procedure (English and Spanish Versions)

Title VI Form Procedure

The LLTS MPO will acknowledge receipt of the complaint/grievance by notifying the Complainant within 15 calendar days of the "Date Received." If the Complainant is unsatisfied with the response from the LLTS MPO Compliance Officer, the LLTS MPO will transmit the complaint/grievance to the proper state or federal agency – Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or the Pennsylvania Department of Transportation (PennDOT) for investigation and disposition pursuant to that agency's Title VI procedures. The Complainant may also file a complaint directly with PennDOT, FHWA, or FTA at any time.

- Complete and return form to LLTS MPO Title VI Compliance Officer at LLTS MPO, 135
 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 or LLTS MPO, Suite 208, Penn Place, 20
 North Pennsylvania Avenue, Wilkes-Barre, PA 18711 within 180 calendar days from the date
 of the alleged incident.
- The complaint/grievance will be reviewed and investigated by the LLTS MPO Title VI Compliance Officer.
- 3. Within 15 days, the LLTS MPO Title VI Compliance Officer will acknowledge receipt of the claim, inform the Complainant of action taken or proposed to be taken to process the allegation; advise the Complainant of their rights under Title VI and related Statutes; and advise the Complainant of their right to submit a claim directly to PennDOT, FHWA, or FTA at any time.
- 4. The LLTS MPO Title VI Compliance Officer will conduct an investigation of the allegation and based on the information obtained, will provide a recommendation for action in a report. The complaint/grievance should be resolved by informal means when possible. Informal attempts and their results will be summarized in the report of findings.
- 5. Within 120 days of receipt of the complaint, the LLTS MPO Title VI Compliance Officer will notify the Complainant of the informal findings and any proposed actions. The notification will advise the Complainant of his/her appeal rights to PennDOT, FHWA, or FTA if they are not satisfied with LLTS MPO's response.
- 6. If the complaint filed with LLTS MPO is turned over to and investigated by PennDOT, FHWA, or FTA, the LLTS MPO Title VI Compliance Officer will monitor the investigation and notify the Complainant of updates, in accordance with applicable regulations, policies, and procedures.
- 7. A summary of the complaint and its resolution will be included as part of the Title VI updates to the proper state or federal agency (e.g.: FHWA, FTA, and PennDOT).
- 8. Records will be available for compliance review audits.

Título VI Procedimiento de Queja

LLTS MPO reconocerá el recibo de la denuncia mediante notificación al demandante dentro de un plazo de 15 días de la presentación de quejas. Si el demandante no está satisfecho con la respuesta del oficial de cumplimiento de LLTS MPO, la denuncia sera transmitida al estado adecuado ó agencia federal – Administración Federal de Carreteras, la Administración Federal de Carreteras (FHWA), la Administración Federal de Tránsito (FTA), y el Departamento de Transporte de Pennsylvania (PennDOT) para la investigación y la disposición de conformidad con los procedimientos de queja del Título VI de dicha agencia. El demandante también puede presentar una queja directamente con PennDOT, FHWA, FTA ó en cualquier momento.

- 1. Llene y envie su solicitud a: Title VI Compliance Officer, LLTS MPO, 135 Jefferson Avenue, 2nd Floor, Scranton, PA 18503 or LLTS MPO, Suite 208, Penn Place, 20 North Pennsylvania Avenue, Wilkes-Barre, PA 18711 dentro de 180 días calendarios despues del supuesto incidente.
- 2. La queja será revisada y examinada por el administrador de LLTS MPO.
- 3. Dentro del plazo de 15 días, el Oficial de Cumplimiento LLTS MPO Título VI reconocera recibo de la reclamación, informará al demandante de las medidas adoptadas o propuestas que deben adoptarse para procesar la acusación; asesorará al demandante de sus derechos en virtud del título VI y los estatutos; y asesorará al demandante de su derecho a presentar una reclamación directamente a PennDOT, FHWA, ó FTA o en cualquier momento.
- 4. El Oficial de Cumplimiento LLTS MPO Título VI llevará a cabo una investigación de la denuncia, y en base a la información obtenida, proporcionará una recomendación para la acción en un informe. La queja debe ser resuelta por medios informales cuando sea posible. Intentos informales y sus resultados se resumen en el informe presentado.
- 5. Dentro de los 120 días siguientes a la recepción de la queja, el Oficial de Cumplimiento LLTS MPO Título VI notificará al demandante de las conclusiones informales y de cualquier acciones propuestas. La notificación será asesorará al demandante de sus derechos de apelación a PennDOT, FHWA, o FTA si no están satisfechos con la respuesta de LLTS MPO.
- 6. Si la denuncia presentada ante LLTS MPO es entregada e investigado por PennDOT, FHWA, o FTA, el Oficial de Cumplimiento LLTS MPO Título VI supervisará la investigación y notificará al demandante de cambios, de conformidad con los reglamentos, políticas y procedimientos.
- 7. Un resumen de la queja y su resolución se incluirá como parte de las actualizaciones del Título VI a la agencia federal o estatal apropiada (por ejemplo: FHWA, FTA, y PennDOT).
- 8. Anotaciones estarán disponibles para auditorías de reviso de cumplimiento.

Appendix F

Language Identification Card & Language Identification Survey

Language Identification Card



Account # 9284

Language Identification Survey

	2004 Census Test Consus LANGUAGE IDENTIFICATION FLASHCARD	
	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
	Խողրում են ը նչում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք Հայերեն:	2. Armenian
	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
	ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodiar
	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
	如果你能读中文或讲中文,请选择此框。	6. Simplified Chinese
	如果你能讀中文或講中文,請選擇此框。	7. Traditional Chinese
	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
	Mark this box if you read or speak English.	11. English
	اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi
DB-3309	U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration U.S. CENSUS BUREAL	n

	Cocher ici si vous lisez ou parlez le français.	13. French
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
	अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
	Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
	Marchi questa casella se legge o parla italiano.	21. Italian
	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
	ໃຫ້ໝາຍໃສ່ຄູ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
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	Assinale este quadrado se você lê ou fala português.	26. Portuguese
	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
	Пометыте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
	Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
	Označte tente štverček, ak viete čítať alebo hovoriť po slevensky.	30. Slovak
	Marque esta casilla si lee o habla español.	31. Spanish
	Markaban itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูลภาษาไทย.	33. Thai
	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
	Відмітьте що клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
	اگرآپ اردو پڑھتے یا بولتے ہیں تواس خانے میں نشان لگا ئیں۔	36. Urdu
	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish
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Appendix G

"One Moment Please" Tool



"One Moment Please" Tool

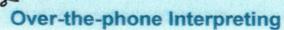
How to Say "One Moment Please" in Eighteen Common Languages

Language: Written in Language **Phonetic Pronunciation** Albanian: Nje minutë ju lutem. nee-yeh mee-noo-teh you loo-tem dakika meen fahdlock (masculine) Arabic: دقيقة من فضلك dakika meen fahdlick (feminine) Chinese: 請稍候 ching show hoe French: Un moment s'il vous plaît. uhn moe-mon seal-voo-play German: Einen Moment bitte. eye-nen moment bee-teh Gujarati: મેહરબાની કરીને એક પળ થોભશો meherbani kariné ek pul thobso Haitian Creole: Tanpri tann yon ti moman. tan-pree tan yaw tee moe-maw Hindi: कृपया एक पल प्रतीक्षा करें kreepya ek pal prateeksha karen Italian: oon moe-mento pair fah-vore-ay Un momento per favore. 少々お待ちください。 Japanese: shosho omachi kudasai Korean: 잠깐 기다리세요 jam-kan ki-da-ri-se-yo Polish: moment prosheh Moment, proszę. 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 chò một chút sin char moe-chew

Account # 9284

Appendix H

Telephone-Based Interpretation Service Access Instructions



Dial the Interpreter:

1-888-804-2044

The auto attendant will prompt:

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

You will also be asked for:

Caller first and last name Site Number LES First Name and last intial

For 3-way calls:

Ask the first person who answers (interpreter or operator) to place the call.

Back-Up Interpreter Number: 1-866-386-1284

(Only use if interpreter is unavailable at primary number above)



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

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



TIPS

How to Work with an Over-the-phone interpreter

Your role

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

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

Your interpreter's role

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

- Make sure your interpreter introduces himself/herself using a first name and ID number. They are not required to provide a last name.
- Your interpreter should not have a side conversation with you or the client. He or she must relay everything that is said back to you or your client. This includes any advice that the client may ask of the interpreter.
- Your interpreter should not discuss anything unrelated to the telephone interpretation assignment.

More questions about over-the-phone interpretation? Contact us at 913-381-3143 or email Interpreter@propio-ls.com.

Appendix I

Human Translation & Interpretation Service Providers

National and International Language Services

Current PennDOT Provider:

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

Other PennDOT Recommended Regional Providers:

- Quantum, Inc.
 240 South 9th Street
 Philadelphia, PA 19107
 http://www.quantumtranslations.com/
- Cetra 7804 Montgomery Avenue, Suite 10 Elkins Park, PA 19027 http://www.cetra.com/
- ParaPlus 2 Coleman Avenue #1 Cherry Hill, NJ 08034 http://www.para-plus.com/
- Language Services Consultants P.O. Box 412 Ardmore, PA 19003 http://www.lsctranslations.com/welcome

Web-Based National & International Providers:

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

Human Translation & Interpretation Service Providers Information Provided by PennDOT Central Office

Watts, Robert

Kelly, Matthew <mattkelly@pa.gov> From: Sent: Friday, May 29, 2015 1:25 PM

Watts, Robert To:

Subject: (NEW) Translation for Documents

Attachments: Vendors who Provide Translation Services.pdf

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

ALCON,

Interpretation/Translations

With a new contract comes some changes. Propio Language Service handles all of the "over the phone interpretation", they do not provide translation services. I have attached a list of Vendors that can provide translation services for documents or anything written. You can call around to get a good price or I have put a check next to companies that we have used with positive results.

Remember that you are a planning partner with PennDOT (Commonwealth of Pennsylvania) and you have the account number to use.

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

Matthew G Kelly | Title VI Specialist

PA Department of Transportation | Bureau of Equal Opportunity DBE/Title VI Division

400 North Street | Harrisburg, PA 17120

Desk Phone: 717.783.1370 Toll Free: 800.468.4201 Fax: 717.772.4026 www.dot.state.pa.us

Contract Number	Supplier Number	Supplier Name	Supplier Mailing Address	Contact Person	Contact Telephone Number	Contact Fax Number	Contact Email Address
4400013539	131275	Quantum Inc	240 S 9th St Philadelphia, PA 19107-5733	Jean Wang	215-627-2251	215-627-5570	jwang@quantumtranslations.com
4400013540	209572	MTM Linguasoft Inc	4621 Cedar Ave Philadelphia, PA 19143-2117	Kathy Quinn	215-729-6765	215-729-1935	siftar@mtmlinguasoft.com
4400013544	422762	Southern Wisconsin Interpreting	110 S 3rd St Delavan, WI 53115-1702	Linda Scaro	262-740-2590	262-740-2592	SAULART@SWITS.US
4400013545	177754	Cetra	7804 Montgomery Ave, Ste 10 Elkins Park, PA 19027-2649	Jule Karmazin	215-635-7090	215-635-6610	julie.karmazin@cetrafed.com
4400013547	385927	Fox Medical	1152 Mae St Ste 122 Hummelstown PA 17033-9185	L Fox	443-244-0193	866-764-3898	lfox@foxcasemanagement.com
4400013549	419194	Logistics Plus Linguistic Solutions	1406 Peach St Ste 3 Erie, PA 16501-1879	Ramzi Zinnekah	814-240-6850		ZINNEKAH@LPLINGUISTICSOLUTION
4400013551	315084	Interpreters and Translators, Inc.	263 Main Street Manchester CT 06042	Anthony Pagano	860-647-0686	860-646-3590	apagano@ititranslates.com
4400013552	309947	Trusted Translations	108 N Virginia Ave Falls Church, VA 22046		202-640-1134	202-351-0512	government@trustedtranslations.com
4400013586	202242	Translating Services Inc. Lazar & Associates	1516 South Bundy Drive, Suite 311 Los Angeles CA 90025	Lisa Solomon	(310) 453-3302	(310) 453-6002	proposals@lazar.com
4400013587	422696	KTL	5055 Seminary Rd Apt 1220 Alexandria, VA 22311-2018	Amir Khan	703-662-0465		info@ktl-communications.com
4400013588	404779	Linguistica International	8819 S Redwood Rd Ste D1 West Jordan UT 84088-9278	Sabrina Morales	801-262-4550	801-262-4622	smorales@linguisticainternational.com
4400013589	422446	ATI Languageline	6100 Edinger Ave APT 634	Raymond Abbas	714-362-1204	714-846-0602	raymond.abbas@yahoo.com
4400014283	324441	Global Arena	230 S Broad St Ste 1605 Philadelphia PA 19102	Carles Pont	215-735-1055	215-735-4188	CPont@globalarena.com
4400014256	193784	Geneva Worldwide	256 W 38th St Fl 10 New York, NY 10018	Jennifer DeJesus	212-255-8400	212-255-8409	rfp@genevaworldwide.com
4400014264	316600	Northwest Interpreters	12500 SE 2nd Cir Vancouver, WA 98684	Vic Marcus	360-566-0492	360-566-0453	vic@nwiservices.com
4400014265	439807	Latitude Prime LLC	80 S 8th St Minneapolis, MN 55402	Elle B Jahansouz	888-341-9080	888-341-9120	email@latitudeprime.com
4400014262	427708	Bilingual Conexion	155 South Queen Street York PA 17401	Claudio Digruttola	717-521-1551	717-521-1551	CLAUDIOD@BILINGUALCONEXION.COM
4400013968	115509	ParaPlus	2 Coleman Ave #1 Cherry Hill, NJ 08034	Carlos Santiago	856-547-3695	856-547-3345	csantiago@para-plus.com
4400014056	135937	Language Services Consultants	PO Box 412 Ardmore, PA 19003	Ruth Karpeles	610-617-8962	610-617-9108	ruth.karpeles@lsctranslations.com

Appendix J

Community and Agency Contacts

Spanish - Community Contacts

Amilcar Arroyo Molinegocio\$ USA Monthly Spanish Newspaper 100 West Broad Street, Suite 107 Hazleton, PA 18201 (570) 501-2177

Dr. Paola Bianco Professor of Spanish Wilkes University (570) 408-4519 paola.bianco@wilkes.edu

Spanish - Church Contacts

Church of Saint Gabriel
Holy Annunciation Parish
122 South Wyoming Street
Hazleton, PA 18201
(570) 454-0212
stgabes@ptd.net
Sunday Mass in Spanish at 12:00 pm and 7 pm

Iglesia Pentecostal Bethesda 311 Rose Street West Hazleton, PA 18202 (570) 497-4161

Iglesia Cristianna Nuevo 363 Park Avenue Wilkes-Barre, PA 18702 (570) 970-2882

Appendix K

Limited-English Proficiency Plan Self-Assessment Checklist

LEP Plan Status					
Is LLTS MPO receiving federal funding?			Yes No		
Date of the most recent LEP Plan/LAP:					
Date of most recent	t Four Factor Analysis:				
Date(s) of demogra	phic data:				
Is an update to the cu needed?	rrent LEP Plan/LAP		Yes No		
LEP Interaction with L	LTS MPO				
Has LLTS MPO interacted with any LEP individuals during the past year?			Yes No		
		Teleph	one Call		
			Correspondenc	е	
	ctions with LEP persons	Office \	Valk-In		
were recorded?		At Publ	ic Meetings		
			ge (e.g. Unique Translate users)	
Identifying LEP Comm	unities			<u> </u>	
Does LLTS MPO have a process for collecting data on the number of LEP persons in the service area and the languages most commonly spoken?			Yes No		
How often is the language data for LLTS MPO's service area analyzed?			very years	S.	
What techniques and resources are used by			oe:		
spatial mapping, com	LEP communities? (e.g. munity input, etc.)				
What data does LLTS	MPO use for identifying	Describ	oe:		
LEP communities and commonly spoken?					
SAFE HARBOR POPUL In the most recent For Thresholds? Please li whether the populatio	e percen	age of the total	service r Facto	area population, and r Analysis.	
Language	LEP Population	% of To	tal Population		ncreasing Jecreasing
1.					
2.					
3.					

OTHER POPULATIONS In the most recent Four Factor Analysis, what language group(s) DID NOT meet the Safe Harbor Thresholds? Please list the LEP population, the percentage of the total service area population, and whether the population is increasing or decreasing vs. the previous Four Factor Analysis.						
Language LEP Population		% of Total Population	☐ Increasing☐ Decreasing			
1.						
2.						
3.	nguaga Assistanas					
Providing Notice of Landau How does LLTS MPO in the availability of language services (e.g. posters,	nform the public about uage assistance	Describe:				
In what language(s) do language assistance s	pes LLTS MPO advertise ervices?	1				
Providing Language As	ssistance					
For the Safe Harbor LE vital documents are tr		1				
Does LLTS MPO offer a services on its website		☐ Yes ☐ No				
If yes, what services are currently used?		☐ Google Translate ☐ Bing Translator ☐ Other: ☐ Other:				
What are the top three which translation are r		1				
Training & Staff Resou	irces					
How does LLTS MPO train staff for interacting with LEP persons? (e.g. identify language spoken, handle translation requests, access interpretation services)		Describe:				
Monitoring and Updating the Language Assistance Plan						
Is the LEP Plan and LAP available to the public for review?		☐ Yes ☐ No				
If yes, where is it available?		Describe:				
How often is the LAP updated (i.e., annually, biennially, etc.)?		☐ Annually ☐ Biennially ☐ Every yea				
When was the LAD last	t undated?	Month You	<u> </u>			

Record of Interactions						
Year:	Page	of				

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

LEP Interaction Tracking Form Annual Report Summary						
Year:	-					
Interactions Summary						
Total Interactions	Successful Interactions	Unsuccessful Interactions	Top Interaction Location			
Language Summary						
Language			Number of Times Requested			
Spanish	Spanish					
Other	Other					
Comitions / Domitions / Domitions						
Services / Requests Summary						
Services most frequently	requested					
Plans or programs most fi	requently addressed					