



Northeastern Pennsylvania Metropolitan Planning Organization Limited-English Proficiency Plan

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Prepared for:
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Background

In 1963, John F. Kennedy called for enactment of Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color and national origin in programs and activities that receive federal financial assistance.

In 2000, an Executive Order was signed by President Bill Clinton titled "*Improving Access to Services for Persons with Limited English Proficiency*". A person with Limited English Proficiency (LEP) refers to an individual for whom English is not their primary language and who has a limited ability to read, write, speak or understand the English language. The Executive Order established that recipients of federal funds must provide meaningful access to LEP individuals; and 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.

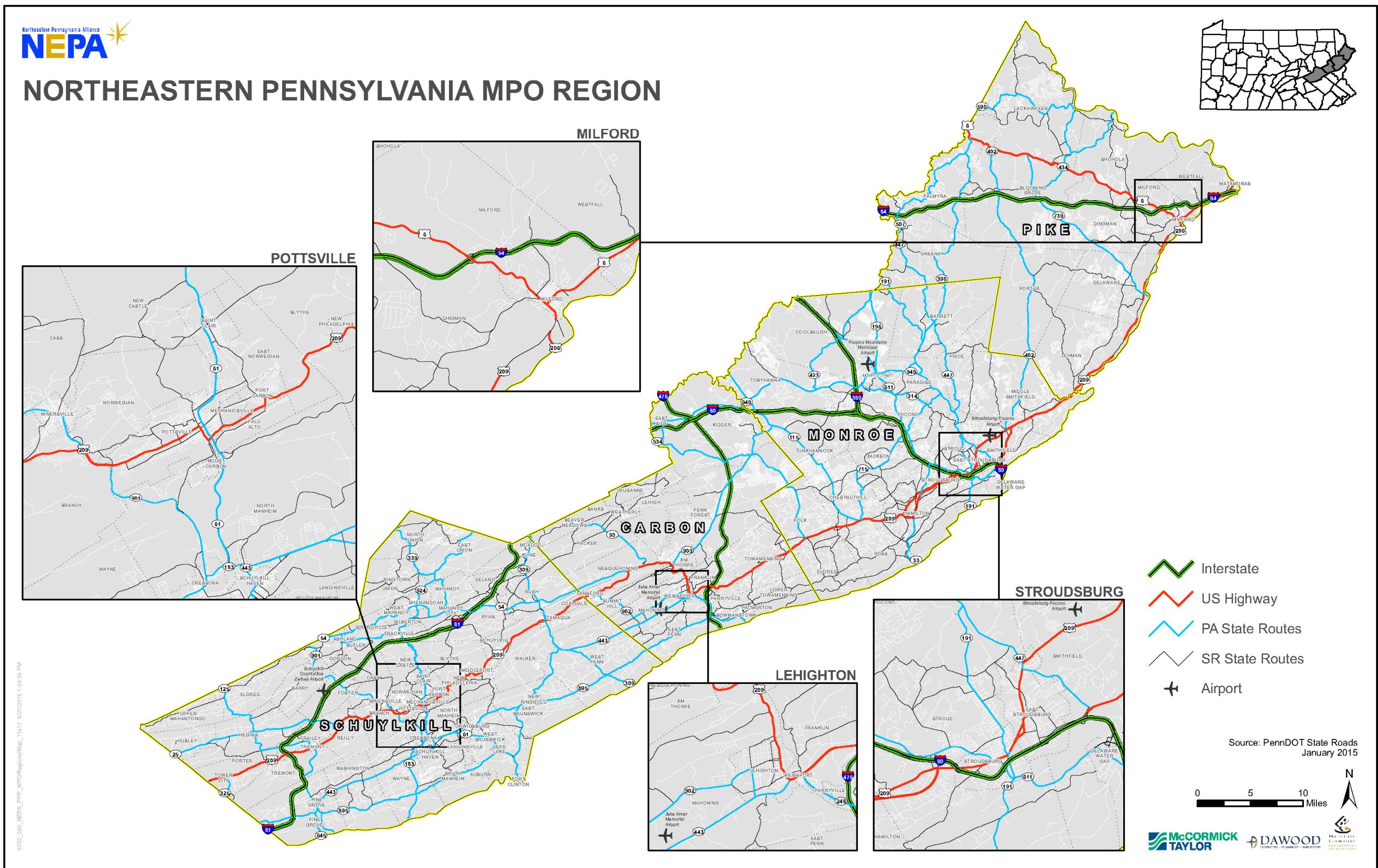
The Four Factors are as follows:

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 NEPA MPO, the service area population is the total population within the region served by the MPO (Carbon, Monroe, Pike and Schuylkill counties) (see **Figure 1**).

Figure 1. NEPA MPO Region



Language characteristics within the NEPA 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 a LEP person.

It is noted that the ACS data for the NEPA MPO region includes the institutionalized populations of two state penitentiaries located in Schuylkill County. The State Correctional Institution Mahanoy is located in Mahanoy Township (inmate population of 2,473 in June 2015) and the State Correctional Institution Frackville is located in Ryan Township (inmate population of 1,159 in June 2015). Additionally, the Pike County Jail is located in Blooming Grove Township (inmate population of 267 in June 2015). The NEPA 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 NEPA MPO Region

Table 1 summarizes the total population and LEP population of All Language Groups in the NEPA MPO Region, with comparison to the State of Pennsylvania as a whole. Of the region's total population age five (5) or older, about 11,700 persons or 2.8% 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 (3.9%).

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

	NEPA MPO Region		Pennsylvania	
	Population Estimate	% of Total Population	Population Estimate	% of Total Population
Total Population Age 5 or Older	417,427		12,008,403	
Total LEP Population All Language Groups <i>Speak English less than "very well"</i>	11,658	2.8%	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 percentage of the population that speaks English less than "very well" is highest in Monroe County (4.4%) and second highest in Pike County (3.3%). Carbon and Schuylkill have similar populations at just over one (1) percent (see **Table 2**).



Figure 2. NEPA MPO Concentration of Persons with Limited English Proficiency

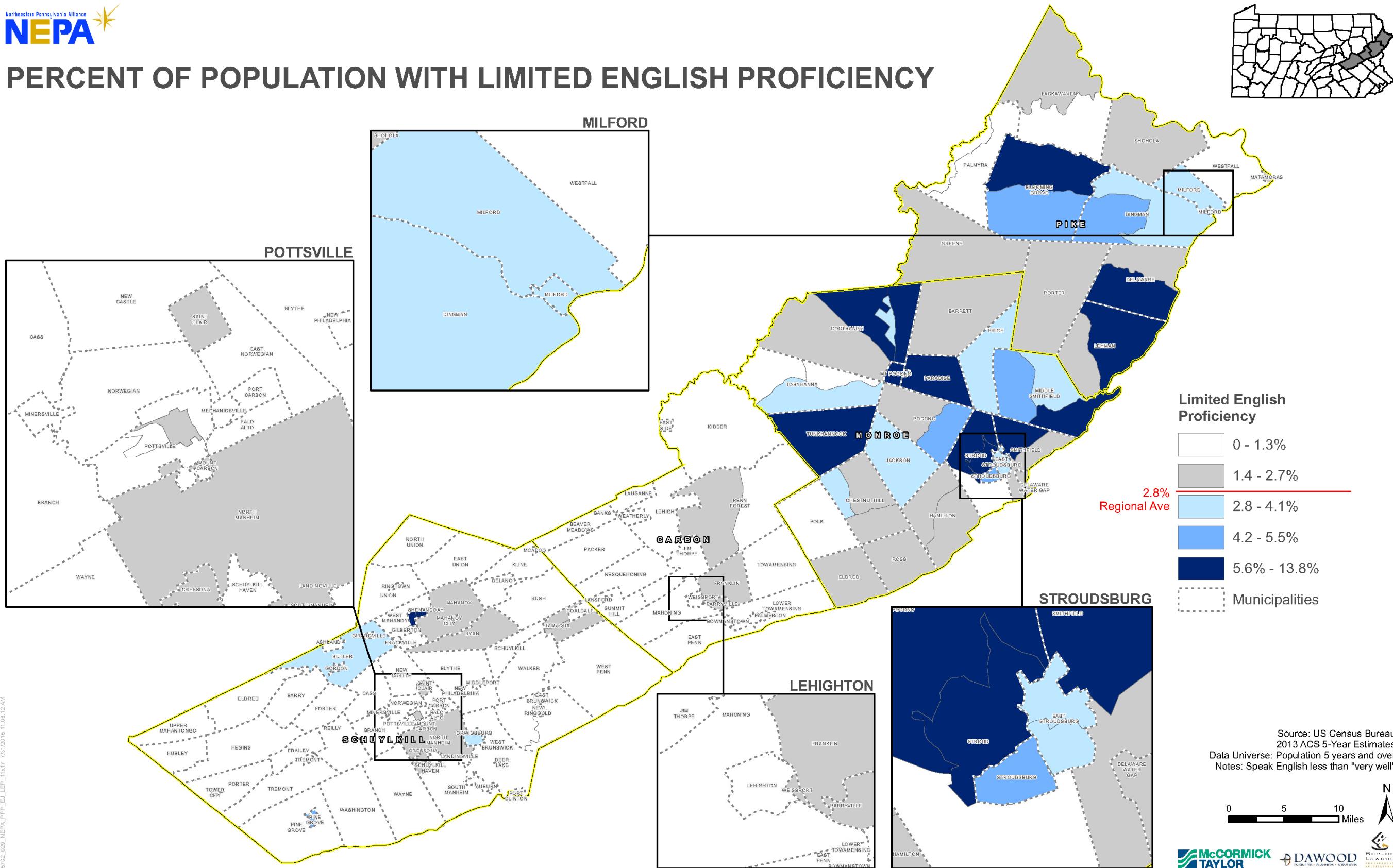


Table 2. LEP Persons for All Language Groups by County

County	Total Population 5 Years and Over	All Language Groups LEP	
		Speak English less than "very well"	% of Total Population
Carbon	61,832	680	1.1
Monroe	160,701	7,071	4.4
Pike	54,663	1,804	3.3
Schuylkill	140,231	2,103	1.5
Total	417,427	11,658	2.8

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

Largest LEP Language Groups in the NEPA MPO Region

Table 3 summarizes population data for the five (5) most populous LEP language groups in the NEPA 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, followed by Polish, Chinese, other Indo-European languages and Italian. Beyond these “Top 5” populations, the region is also home to LEP persons who speak the following (in order by decreasing population): French (348), Arabic (314), other Slavic languages (282), Portuguese or Portuguese Creole (275), Korean (275), Russian (272), Gujarati (217), German (209) and African languages (205). The LEP population for each of the other language groups is 200 or fewer.

The Spanish and Chinese LEP populations in the NEPA MPO region are smaller than the statewide LEP populations for those languages. The Polish LEP population in the NEPA MPO region is approximately five times greater than the statewide Polish LEP population. The other Indo-European languages and Italian LEP populations are approximately the same proportion in the NEPA MPO region as in Pennsylvania as a whole.

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

	NEPA MPO Region		Pennsylvania	
	Population Estimate 5 Years and Over	% of Total Population	Population Estimate 5 Years and Over	% of Total Population
Total Population	417,427		12,008,403	
LEP Language Groups -- Speak English less than "very well"				
Spanish	5,280	1.26%	204,631	1.70%
Polish	1,318	0.32%	7,700	0.06%
Chinese	495	0.12%	40,187	0.33%
Other Indo-European languages	356	0.09%	6,838	0.06%
Italian	356	0.09%	12,671	0.07%

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 NEPA MPO region potentially qualifying for “Safe Harbor” treatment (guideline used to establish when it is appropriate to provide language-specific services)—namely the Spanish LEP and Polish LEP populations. The Safe Harbor Provision is further defined following discussion of the Spanish and Polish LEP populations.

Spanish Language Group

Table 4 summarizes the Spanish LEP populations by county. Monroe County has the largest percent of the population that is Spanish LEP at just under two (2.00) percent.

Table 4. Spanish Language Group LEP Persons by County

County	Total Population	Spanish Language LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Carbon	61,832	167	0.27%
Monroe	160,701	3,141	1.95%
Pike	54,663	732	1.34%
Schuylkill	140,231	1,240	0.88%
Total	417,427	5,280	1.26%

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

Figures 3 and 4 illustrate the distribution of Spanish LEP persons according to population and concentration, respectively. According to tract level data shown on **Figure 4**, the higher concentrations of Spanish LEP persons are generally located in the following areas:

- Monroe County
 - Coolbaugh Township
 - Chestnuthill Township
 - East Stroudsburg Borough
 - Middle Smithfield
 - Mt. Pocono Borough
 - Paradise Township
 - Smithfield Township
 - Stroud Township
 - Tobyhanna Township
 - Tunkhannock Township
- Pike County
 - Blooming Grove Township
 - Delaware Township
 - Dingman Township
 - Lehman Township
- Schuylkill County
 - Butler Township
 - Shenandoah Borough
 - Tamaqua Borough

Figure 3. Spanish LEP Population by Census Tract



LEP - SPANISH LANGUAGE SPEAK ENGLISH LESS THAN VERY WELL

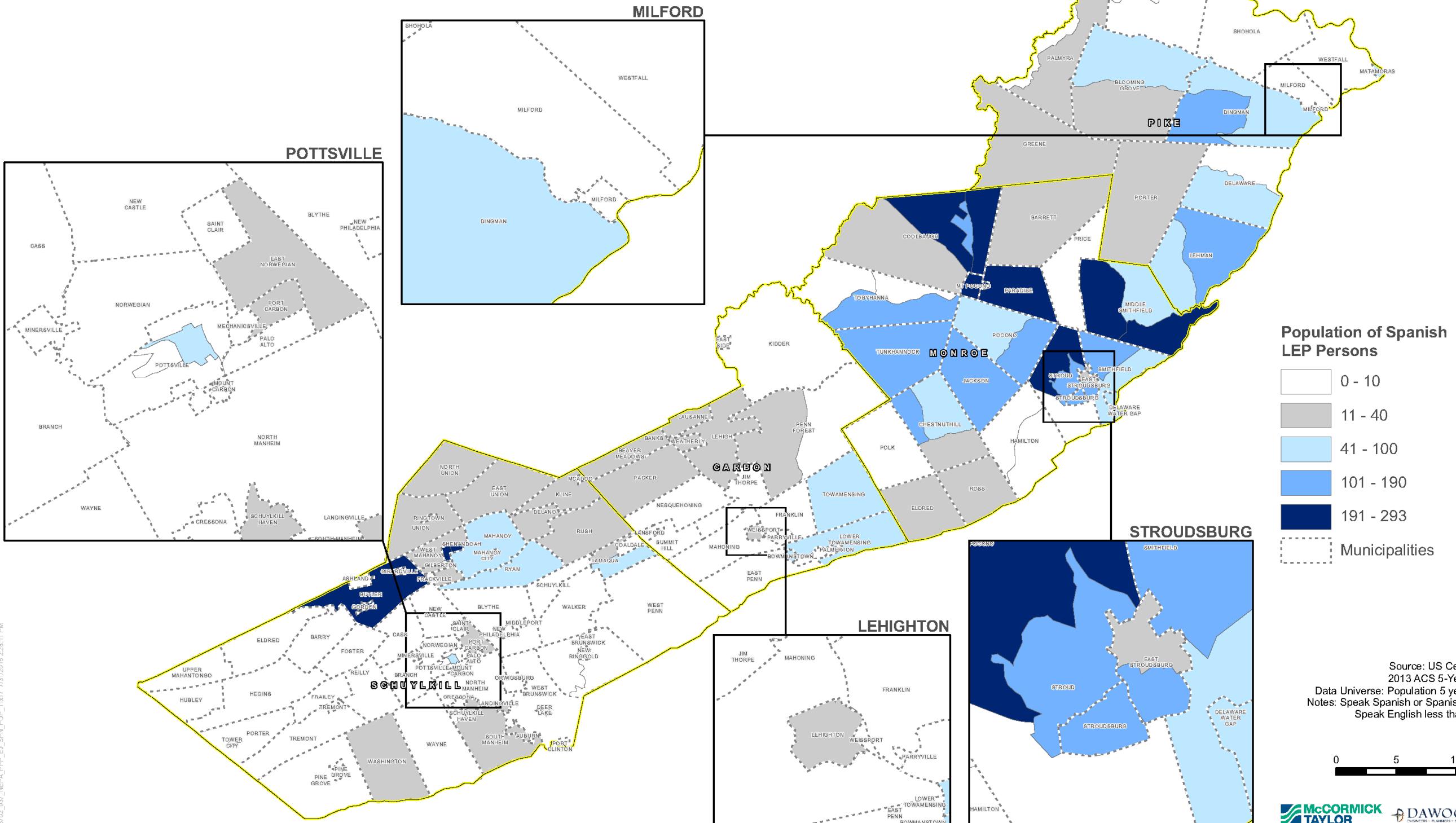
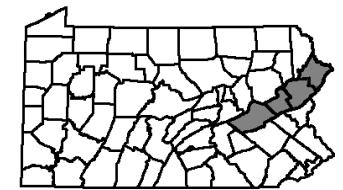
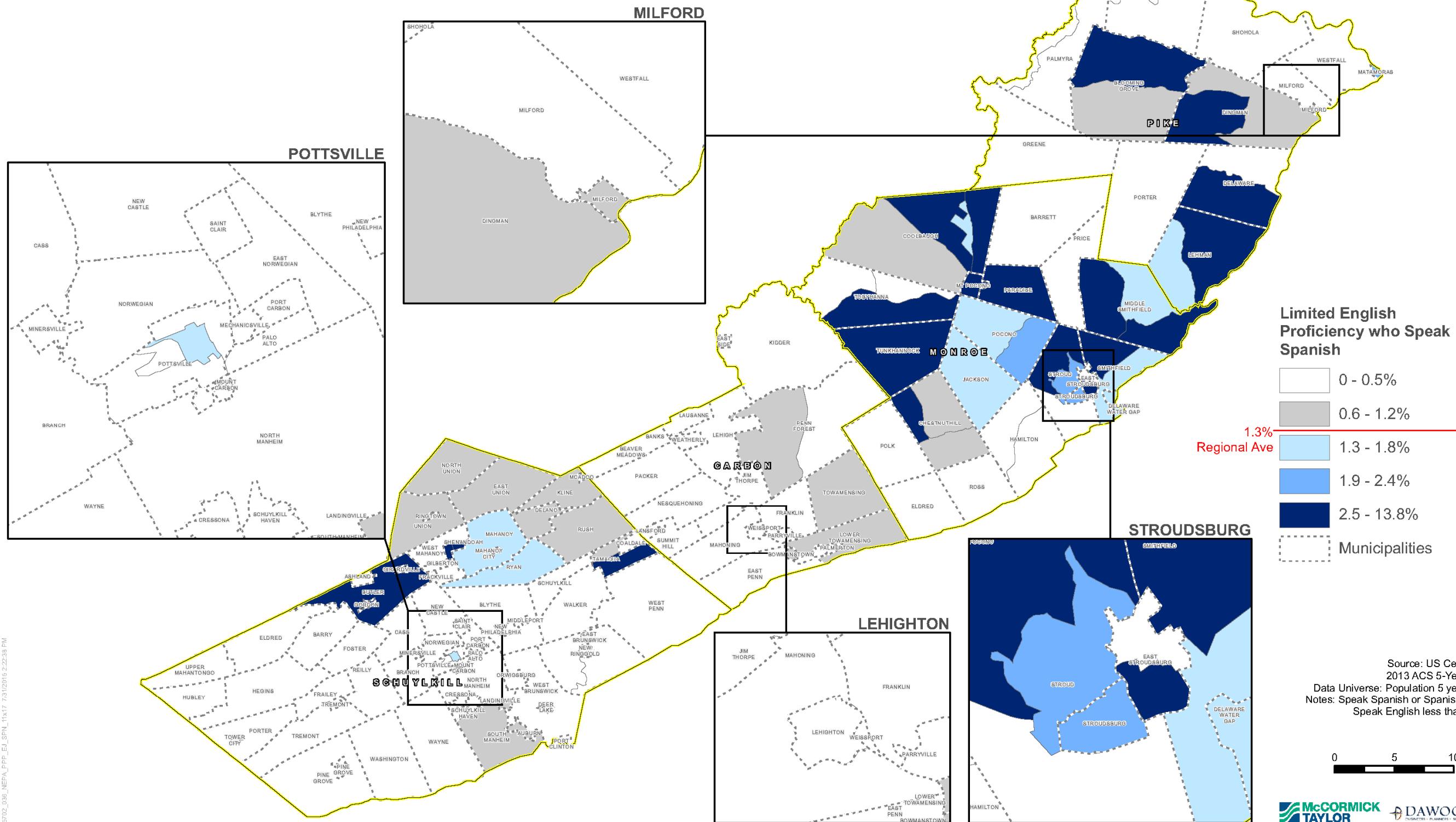
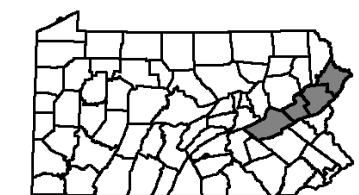


Figure 4. Spanish LEP Concentration by Census Tract

PERCENT OF POPULATION WITH LEP WHO SPEAK SPANISH



Polish Language Group

Table 5 summarizes the Polish LEP populations by county. Pike County has the largest Polish LEP population at 0.60%, followed closely by Monroe County at 0.48%.

Table 5. Polish Language Group LEP Persons by County

County	Total Population	Polish Language LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Carbon	61,832	157	0.25%
Monroe	160,701	773	0.48%
Pike	54,663	329	0.60%
Schuylkill	140,231	59	0.04%
Total	417,427	1,318	0.32%

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

Figures 5 and 6 illustrate the distribution of Polish LEP persons according to population and concentration, respectively. Based on tract level data shown on **Figure 6**, the higher percentages of Polish LEP persons are generally located in the following locations:

- Carbon
 - Franklin Township
 - Parryville Borough
 - Penn Forest Township
 - Weissport Borough
- Monroe
 - Chestnuthill Township
 - Coolbaugh Township
 - Hamilton Township
 - Pocono Township
 - Polk Township
 - Tunkhannock Township
- Pike
 - Blooming Grove Township
 - Delaware Township
 - Dingman Township
 - Lehman Township
 - Milford Borough
 - Palmyra Township
 - Shohola Township
- Schuylkill
 - Blythe Township
 - Middleport Borough
 - New Philadelphia Borough

Figure 5. Polish LEP Population by Census Tract



LEP - POLISH LANGUAGE SPEAK ENGLISH LESS THAN VERY WELL

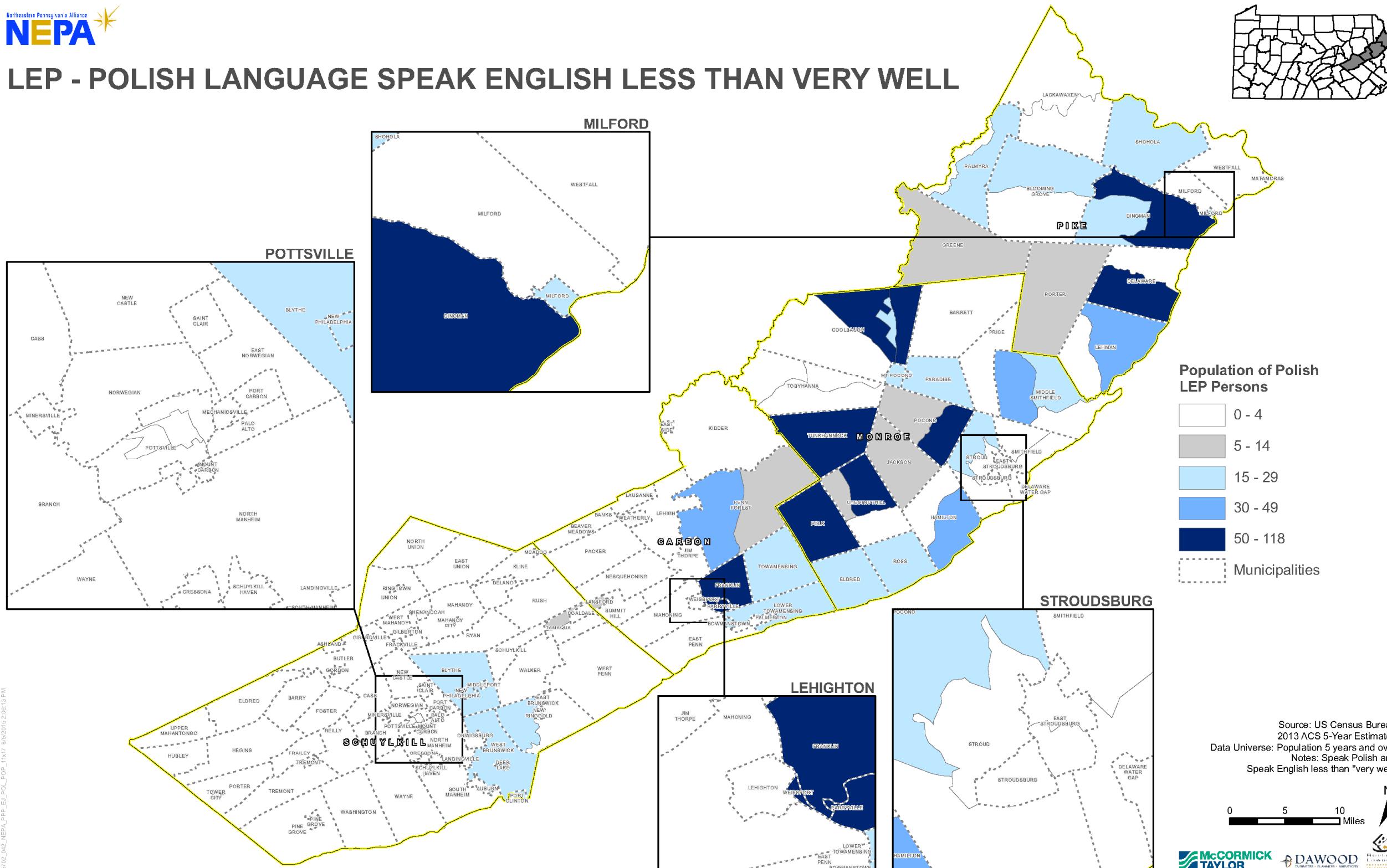
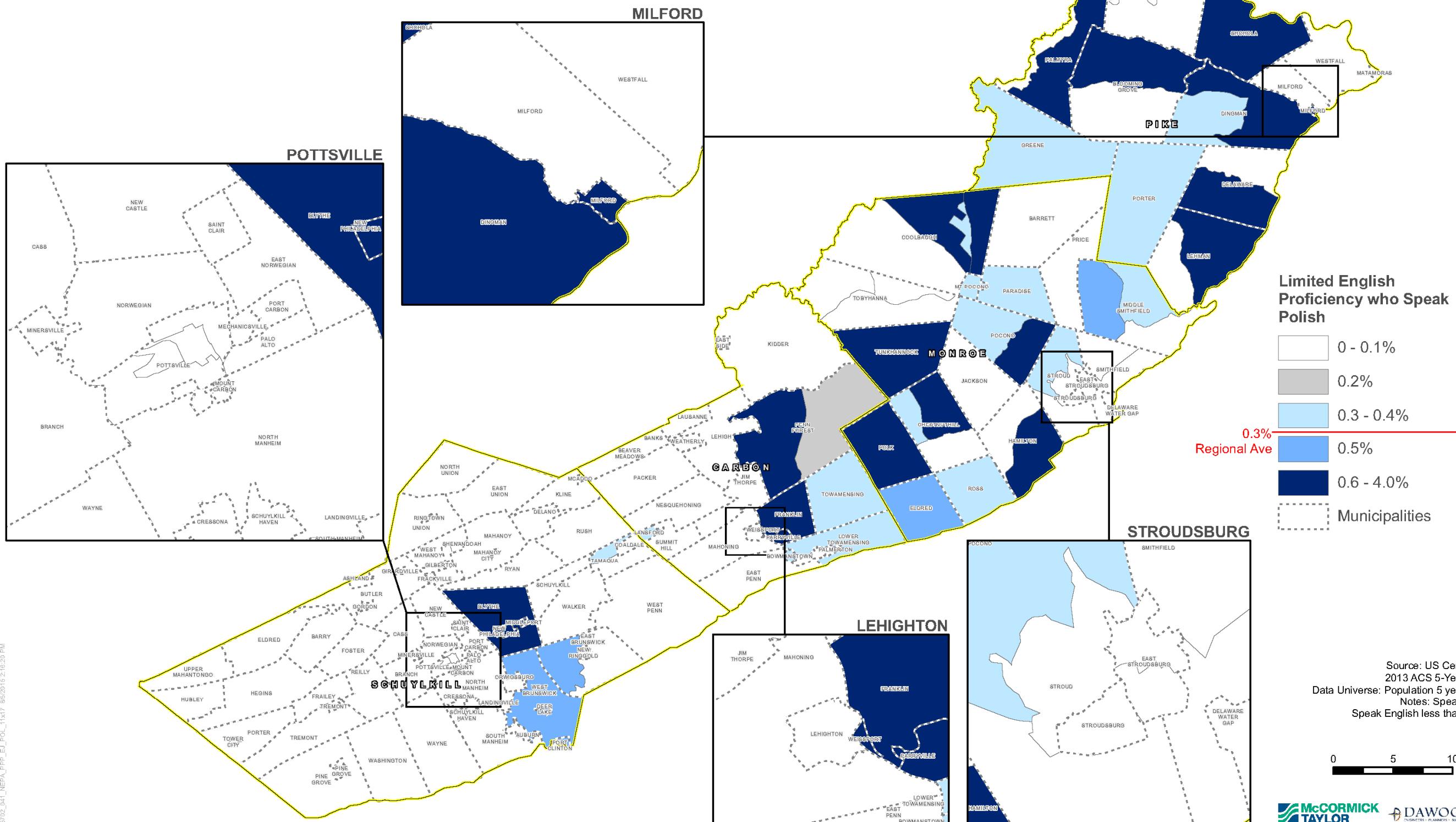
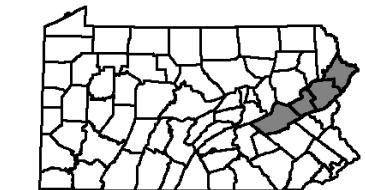


Figure 6. Polish LEP Concentration by Census Tract



PERCENT OF POPULATION WITH LEP WHO SPEAK POLISH



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 it is appropriate to provide language-specific services and what those services should entail. The Provision calls for 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 NEPA MPO region as a whole (i.e., the "service area"), the Safe Harbor Provision is potentially¹ triggered for Spanish language and Polish language groups (see **Table 3**). The total LEP population for these groups exceeds the 1,000 person threshold within the MPO region, even though the concentrations of the populations (at the regional level) fall 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 [NEPA MPO] written translation obligations" (FTA C 4702.1B, Chapter III-9).

Based on the standard of practice, "vital documents" typically include those that explain how to access an organization's services (including language assistance services), letters that require a response from a customer, complaint forms and notification of rights. For the purposes of this LEP Plan, the NEPA 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**); and,
- Title VI Complaint Form Procedures (**Appendix E**).
- Executive Summaries of Primary Plans and Documents
 - Long-Range Transportation Plan
 - Public Participation Plan
 - Transportation Improvement Program

When a targeted outreach activity is triggered by the presence of a LEP population (see Section 6 of the Public Involvement 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."

Factor 2 – Frequency of Contact with LEP Persons

To date, the NEPA 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.

The NEPA MPO staff were 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 yet arisen, the NEPA 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 NEPA 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 NEPA MPO area; resources for phone, in-person and written translation; and LEP program evaluation techniques.

Factor 3 – Nature and Importance of the Program

The NEPA MPO is primarily a planning organization for transportation investments in the four-county region. The MPO does not typically provide direct assistance to individuals; and as such, does not have the direct impact on the day-to-day life of residents in the region; as compared to a transit agency. The NEPA MPO staff is aware of the importance of identifying LEP populations near a specific project area 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, 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

The NEPA MPO is a small agency with minimal 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. The phone-based, on-demand interpretation service provided by the Commonwealth of Pennsylvania, through PennDOT, is one such service.

The MPO pools resources with other elements of the larger NEPA Alliance organization to develop and maintain the administrative/reception staff and other technical staff. 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. The pooled resources of the NEPA Alliance also maintain the agency's webpage, office facility and the associated office equipment and services.

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 NEPA 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 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 or Polish. Immediate assistance for Spanish and Polish 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 NEPA 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 NEPA MPO website, which may be translated using Propio, Google Translate, Bing 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 the NEPA 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 (including Spanish and Polish) is provided in **Appendix F**. This appendix also includes a Language Identification Survey from the U.S. Census Bureau, which can be used when 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 potential for interaction with LEP persons, the NEPA 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 NEPA MPO will provide human-translated versions of its vital documents. Translated summaries of the NEPA MPO’s vital planning documents will be provided in Spanish or Polish 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 NEPA 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. As an implementation step of this plan, the NEPA MPO intends to implement Google Translate on the entire NEPA MPO website. 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, the NEPA MPO intends to implement code that shows icons for the largest five (5) LEP language groups in the NEPA 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 Involvement Plan (PIP). In large part, this encompasses the NEPA MPO committee meetings and periodic plan-specific public meetings for the Transportation Improvement Program, Long Range Transportation Plan, Public Involvement Plan and Coordinated Public Transit and Human Services 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, social media postings and email blasts to interested parties are supplemental advertisement techniques that the NEPA MPO is committed to using, per its PIP.

The NEPA 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, as appropriate. The notice will be provided in English, Spanish and Polish 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 Northeastern Pennsylvania Metropolitan Planning Organization (NEPA 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 NEPA MPO at least two (2) business days prior to the [meeting / event / activity]. Contact the MPO by phone at (570) 655-5581, by written letter to NEPA MPO, 1151 Oak Street, Pittston, PA 18640, or by email to XXXXXXXX@XXXXXX.

Spanish:

“El contenido de este [anuncio / Comunicado de Prensa / contabilización] está disponible en formatos alternativos y otros idiomas a petición en la organización Northeastern Pennsylvania Metropolitan Planning (NEPA 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 NEPA MPO al menos cinco (5) días antes de la [reunión / evento / la actividad]. Comuníquese con la MPO por teléfono al (570) 655-5581, en carta escrita a NEPA MPO, 1151 Oak Street, Pittston, PA 18640, o por correo electrónico a XXXXXXXX @ XXXXXX.

Polish:

Zawartość [reklama / Informacja prasowa / delegowania] jest dostępne w innych formatach i innych językach na życzenie, kontaktując się z Northeastern Pennsylvania Metropolitan Organizacji Planowania (NEPA MPO). Osoby, które planują wziąć udział w ogłoszonej [/ event / spotkanie działalności] i wymagają pomocy tłumacza języka i / lub specjalnych udogodnień w ramach amerykańskiej Ustawy o Niepełnosprawnych NEPA należy skontaktować się z co najmniej pięciu MPO (5) dni przed spotkania / imprezy [/ Działalność]. Skontaktuj się z MPO telefonicznie: (570) 655-5581, w drodze pisemnego listu do NEPA MPO, 1151 Oak Street, Pittston, PA 18640, lub e-mailem do XXXXXXXX @ XXXXXX.

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

Office Walk-In

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

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

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*. The NEPA MPO can utilize language identification cards at public meetings or other in-person venues (including the NEPA Alliance office) 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 a 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 or Polish 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 email correspondence. Both contact points may be preferred by 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, 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 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 NEPA MPO's website address is <http://www.nepa-alliance.org/transportation>. The site provides a platform to disseminate information about its plans and programs, advertise upcoming activities/meetings and provide contact information. Contact with the NEPA MPO through their website portal is one of the more likely contact points to be used by LEP persons. Information and answers to questions may be handled on a self-serve basis, which is typically a preferred option for persons who are comfortable with the internet and computer technology. For a LEP person, looking up a webpage may be more accessible and understandable than telephone or in-person contact.

The NEPA MPO intends to implement Google Translate on its website. In addition, certain human-translated “vital documents” (identified previously) will be made available on the website in Spanish and Polish. While Google Translate can be a useful tool for obtaining automatic translation results, the USDOT/Federal Highway Administration has noted the need for all agencies receiving federal assistance to verify the accuracy of any automated translation. Therefore, four (4) of the MPO’s primary pages were translated automatically using Google Translate. A bilingual translator verified the results. The MPO webpages were sampled on September 14, 2015. Based on the analysis of these pages, Google Translate provides a passing Spanish translation in spite of consistent translation errors. The following categories of issues were identified:

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

The issues on specific webpages were as follows:

Webpage Title	Summary of Issues
Metropolitan Planning Organization http://www.nepa-alliance.org/transportation/nepa-metropolitan-planning-organization-mpo/	<ul style="list-style-type: none"> • 1 Capitalization error • 3 Incorrect translations • 1 Unnecessary translation • 1 Lack of translation • 1 Inaccurate acronym translation
Statistics and Background http://www.nepa-alliance.org/transportation/nepa-mpo-statistics-and-background/	<ul style="list-style-type: none"> • 10 Incorrect translations • 1 Individual/plurality issue • 3 Lack of translations • 1 Subject/Modifier translation error
NEPA MPO Long Range Transportation Plan http://www.nepa-alliance.org/transportation/nepa-mpo-long-range-transportation-plan/	<ul style="list-style-type: none"> • 5 Subject/Modifier translation errors • 1 Feminine/Masculine word error • 4 Capitalization errors • 2 Improper Tense • 3 Lack of translations • 3 Unnecessary translations • 3 Incorrect translations
Title VI – Civil Rights and Environmental Justice http://www.nepa-alliance.org/transportation/title-vi-civil-rights-and-environmental-justice/	<ul style="list-style-type: none"> • 4 Feminine/masculine word errors • 6 Incorrect Translations • 5 Subject/Modifier translation errors • 5 Unnecessary translations • 3 Tense issues • 4 Lack of translation • 1 Individual/plurality issue • 1 Capitalization error

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

- Adding the *Notice of Language Services* to the NEPA MPO webpage, with one or more links added in the navigation menu. The *Notice* would display in Spanish, Polish 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, Polish 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 NEPA 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 NEPA MPO would go through the NEPA Alliance office. NEPA Alliance 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 a meeting. A LEP person who places a phone call to the NEPA MPO staff will likely 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, Polish and Other Spoken Languages

- Language Identification Card – The card allows a LEP individual to indicate their language (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 NEPA MPO will have at least one trained staff person designated to interact with the LEP person(s) in attendance. The staff person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion. 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 NEPA MPO has identified the processes and tools to be used in various contexts to provide language assistance services. A staff training program will be developed to train the staff who will be called upon to implement these processes and use the tools.

The NEPA MPO will prepare a training presentation to be used in equipping staff in providing language assistance. Versions of these materials are maintained in electronic (PDF) and paper copy. Each staff member will be asked to complete the training presentation.

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

To ensure that the language assistance materials can be accessed quickly and discretely when a LEP person calls or visits the MPO office, a paper copy binder will be created and maintained.

Review Process for the LEP Plan and LAP

The LAP, along with the larger LEP Plan, will be monitored annually and reviewed/updated as necessary biennially (in conjunction with the Public Involvement Plan) by a member of the NEPA 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 monitoring.

An update to the LAP, which is provided in the appendix of the NEPA MPO Public Involvement Plan, will be considered a “technical update” and would not require public comment and re-adoption by the MPO unless the update substantially changes the public participation process. The following materials are included in **Appendix K** for use in the annual monitoring 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 NEPA 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 a 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.

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

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 NEPA MPO Staff
Appendix B	Notification of Language Services (English, Spanish, and Polish Versions)
Appendix C	Title VI Notice to Beneficiaries (English, Spanish, and Polish Versions)
Appendix D	Title VI Complaint Form (English, Spanish, and Polish Versions)
Appendix E	Title VI Complaint Form Procedure (English, Spanish, and Polish 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 Limited English Proficiency Plan Interaction Tracking Form

Appendix A

Language Assistance Interview with NEPA MPO Staff

NEPA MPO Interview Questions (Written Responses Received August 20, 2015)

Participants: Alan Baranski, NEPA MPO
Kate McMahon, NEPA MPO
Michelle Goddard, McCormick Taylor
Lugene Keys, McCormick Taylor
Brandy Rotz, McCormick Taylor

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

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

A: No.

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

A: No.

Q: Has NEPA 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: None that we are aware of.

Appendix B

Notification of Language Services (English, Spanish, and Polish Versions)

Notice of Language Services

The NEPA 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 NEPA MPO, please call (570) 655-5581 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 NEPA MPO, please write in your preferred language. Address paper correspondence to NEPA MPO, 1151 Oak Street, Pittston, PA 18640. 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 NEPA MPO is committed to maintaining Spanish and Polish 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 NEPA MPO office.

Notificación de Servicios Lingüísticos

NEPA MPO ofrece servicios de interpretación de idiomas y traducción de documentos a petición. Si su idioma preferido no es el Inglés, por favor dejenos saber su idioma para poder conversar 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 acerquese 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 NEPA MPO, por favor llame al (570) 655-5581 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 NEPA MPO, por favor escriba en su idioma preferido. La dirección para la correspondencia a NEPA MPO es la siguiente: 1151 Oak Street, Pittston, PA 18640. 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 recibir la respuesta traducida en su idioma.

Traducciones de documentos disponibles

NEPA 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 NEPA MPO.

Zawiadomienie o serwisie językowym

NEPA MPO dostarcza interpretacji języka i tłumaczeń dokumentów na żądanie. Jeśli preferowany język nie jest angielski, z przyjemnością będziemy się komunikować z Państwem w wybranym języku. Poniżej opisano, co można oczekwać podczas interakcji z naszymi pracownikami...

Osobiście

Prosimy zwrócić się do *Witamy / Zarejestruj-W* stacji i podać preferowany język. Jeżeli osoba nie może zrozumieć państwa prośby, proszę wskazać preferowany język spośród kart identyfikacyjnych język ułożonymi przed państwem. Proszę wskazać preferowany język. Osoba pomagająca państwu udostępnii usługę tłumaczenia poprzez serwis telefoniczny, aby pomóc w rozmowie. Tłumaczenie jest dostępne w wielu różnych językach i jest bezpłatne. Przez telefon

Jeśli chcesz połączyć się z NEPA MPO, zadzwoń (570) 655-5581 i poproś o preferowany język. Jeżeli osoba odpowiadająca na wezwanie nie może zrozumieć państwa prośby, uprzejmie poprosi o cierpliwość i udostępnii usługę tłumaczenia poprzez serwis telefoniczny, aby pomóc w rozmowie. Tłumaczenie jest dostępne w wielu różnych językach i jest bezpłatne. Prosimy o cierpliwość podczas znalezienia odpowiedniego tłumacza na linii.

Dzięki korespondencji

Przy pisemnej korespondencji prosimy napisać w wybranym języku adres NEPA MPO, 1151 Oak Street, Pittston, PA 18640. Otrzymaną korespondencję przetłumaczymy, a następnie w przeciągu 45 dni udzielmy odpowiedzi (jeśli to możliwe i właściwe) w wybranym języku i w języku angielskim.

Tłumaczenia dokument dostępny

NEPA MPO jest zobowiązana do utrzymania hiszpańskich i polskich tłumaczeń ważnych dokumentów, które wyjaśniają, jak korzystać z usług MPO (wraz z usługą pomocy w tłumaczeniu), formy składania i zgłoszenia skarg. Kopie wyżej wymienionych dokumentów są dostępne za pośrednictwem biura NEPA MPO.

Appendix C

Title VI Notice (English and Spanish Versions)

**NORTHEASTERN PENNSYLVANIA
METROPOLITAN PLANNING ORGANIZATION (NEPA MPO)
NOTIFICATION OF PROTECTIONS TO THE PUBLIC OF RIGHTS UNDER TITLE VI
AND INSTRUCTIONS ON HOW TO FILE A COMPLAINT**

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

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

For more information on the NEPA 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
Northeastern Pennsylvania MPO
1151 Oak Street
Pittston, PA 18640
(570) 655-5581

<http://www.nepa-alliance.org/transportation/title-vi-civil-rights-and-environmental-justice/>

After the complaint is processed, a response (if requested) will be sent to the individual 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.

**NORTHEASTERN PENNSYLVANIA ORGANIZACIÓN DE PLANIFICACIÓN
METROPOLITANA (NEPA MPO)**

**NOTIFICACIÓN DE PROTECCIONES AL PÚBLICO DE DERECHOS BAJO TÍTULO VI
Y INSTRUCCIONES PARA PRESENTAR UNA QUEJA**

NEPA MPO está comprometida a 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 habilidad limitada de hablar inglés. Ninguna persona 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 e ilegal bajo Título VI puede presentar una queja. Todas las quejas recibidas están documentadas y asignadas a los empleados apropiados para investigación.

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

Title VI Compliance Officer
Northeastern Pennsylvania MPO
1151 Oak Street
Pittston, PA 18640
(570) 655-5581

<http://www.nepa-alliance.org/transportation/title-vi-civil-rights-and-environmental-justice/>

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

El demandante puede presentar 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.

**PÓŁNOCNO PENNSYLVANIA
METROPOLITAN PLANOWANIE ORGANIZACJA (NEPA MPO)
ZAWIADOMIENIE OCHRONY DO PUBLICZNEJ W ZAKRESIE PRAW NA PODSTAWIE ARTYKUŁ VI
I INSTRUKCJE, JAK ZŁOŻYĆ SKARGĘ**

Bez względu na rasę, kolor skóry, niepełnosprawność, płeć, wiek, niskie dochody, pochodzenie, język lub ograniczona znajomość języka angielskiego (LEP) NEPA MPO zapewnia, że w ramach swoich usług żadna osoba nie zostanie wykluczona z udziału, korzyści, lub być przedmiotem dyskryminacji jak przewidziano w Title VI Civil Rights Act z 1964 roku, z późniejszymi zmianami.

Każda osoba, która uważa, że została poszkodowana w wyniku niezgodnych z prawem praktyk dyskryminacyjnych w ramach Title VI może złożyć skargę. Wszystkie otrzymane skargi są udokumentowane i zbadane.

Więcej informacji o programie na rzecz praw obywatelskich w NEPA MPO i procedur jak złożyć skargę lub uzyskać informację w innym języku, prosimy o kontakt:

Title VI Compliance Officer
Northeastern Pennsylvania MPO
1151 Oak Street
Pittston, PA 18640
(570) 655-5581

<http://www.nepa-alliance.org/transportation/title-vi-civil-rights-and-environmental-justice/>

Po przesłaniu skargi, odpowiedź (jeżeli jest wymagana), zostanie wysłana do osoby składającej skargę i właściwe działania naprawcze zostaną podjęte.

Skargę można złożyć bezpośrednio z Federal Highway Administration, składając skargę do Equal Opportunity Specialist U.S. Department of Transport Federal Highway Administration, 228 Walnut Street, Room 508, Harrisburg, PA 17101-1720.

Appendix D

Title VI Complaint Form (English, Spanish, and Polish Versions)

It is the NEPA MPO's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, disability, gender, age, low income, national origin, language or Limited English Proficiency (LEP), be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs or services, as provided by Title VI of the Civil Rights Act of 1964, as amended. These procedures apply to all external complaints relating to any program or activity administered by the NEPA 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.

Complainant Name:

Name of Individual Assisting Complainant:

Complainant Address:

Individual Assisting Address:

Complainant Phone:

Individual Assisting Phone:

Complainant Alt. Phone:

Individual Assisting Alt. Phone:

Which of the following describes the reason(s) the alleged discrimination took place? Circle one or more.

Race Age Color Gender Language/LEP National Origin Disability Retaliation

Date(s) of alleged discrimination: _____

If you require assistance in completing this form, please contact the NEPA MPO Title VI Compliance Officer by calling (570) 655-5581. Please return the completed form to the NEPA MPO Title VI Compliance Officer at NEPA MPO, 1151 Oak Street, Pittston, PA 18640. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

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

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

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

Please list any other agency where complaint has been filed:

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

Complainant's Signature Print Name of Complainant Date

Assisting Individual Complainant's Signature Print Assisting Individual Name Date

Date Received: _____ Received By: _____

If you require assistance in completing this form, please contact the NEPA MPO Title VI Compliance Officer by calling (570) 655-5581. Please return the completed form to the NEPA MPO Title VI Compliance Officer at NEPA MPO, 1151 Oak Street, Pittston, PA 18640. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

NORTHEASTERN PENNSYLVANIA ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (NEPA MPO) Procedimiento de Queja del Título VI

NEPA MPO está comprometido con asegurar que ninguna persona, por motivos de raza, color, discapacidad, edad, bajos ingresos financieros, nacionalidad, idioma, o habilidad limitada de hablar inglés, 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 NEPA 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 el MPO título VI Oficial de Cumplimiento NEPA llamando al (570) 655-5581. Por favor devuelva el formulario completo a la MPO título VI Oficial de Cumplimiento NEPA en NEPA MPO, 1151 Oak Street, Pittston, PA 18640. quejas Título VI deben ser presentadas dentro de los 180 días calendario a partir de la fecha de la supuesta discriminación.

Nombre del Demandante:

Dirección del Demandante:

Número de Teléfono del Demandante:

Número de Teléfono Alternativo del Demandante:

Nombre de la Persona Ayudando al Demandante:

Dirección del Ayudante:

Número de Teléfono del Ayudante:

Número de Teléfono Alternativo del Ayudante:

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

Raza Edad Color Sexo Idioma Nacionalidad Discapacidad Represalias

Fecha(s) de Incidente: _____

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

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

Por favor, indique el nombre (s), título y dirección (si se conoce) de la persona(s) que puedan tener conocimiento del supuesto incidente(s) o sean percibidos como partes de la queja del incidente(s):

Por favor indique cualquier otra agencia donde una denuncia haya sido presentada:

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

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

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

Fecha de Recepción: _____ Recibido por: _____

TITLE VI FORMULARZ REKLAMACYJNY

Bez względu na rasę, kolor skóry, niepełnosprawność, płeć, wiek, niskie dochody, pochodzenie, język lub ograniczona znajomość języka angielskiego (LEP) NEPA MPO zapewnia, że w ramach swoich usług żadna osoba nie zostanie wykluczona z udziału, korzyści, lub być przedmiotem dyskryminacji jak przewidziano w artykule VI Civil Rights Act z 1964 roku, z późniejszymi zmianami. Procedury te mają zastosowanie do wszystkich skarg zewnętrznych związanych z programami lub działalnościami zarządzane przez NEPA MPO lub jej podgrup odbiorców, konsultantów i wykonawców, złożony na podstawie artykułu VI Ustawy o Prawach Obywatelskich z 1964 z późniejszymi zmianami, (w tym w niekorzystnej sytuacji i Przedsiębiorstwem Równe Biznesu Składniki możliwości zatrudnienia), a także inne powiązane przepisy, które zakazują dyskryminacji.

Następujące informacje są niezbędne do złożenia skargi. Jeśli potrzebujesz pomocy w wypełnieniu formularza, prosimy o kontakt z NEPA MPO Title VI Compliance Officer pod numerem (570) 655-5581. Proszę odesłać wypełniony formularz do NEPA MPO Title VI Compliance Officer w NEPA MPO, 1151 Oak Street, Pittston, PA 18640. Title VI reklamacje należy złożyć w ciągu 180 dni kalendarzowych od daty domniemanej dyskryminacji.

Skarżący

Imię i Nazwisko:

Adres:

Telefon:

Telefon 2:

Osoba wspomagająca powoda

Imię i Nazwisko:

Adres:

Telefon:

Telefon 2:

Które z poniższych opisuje przyczynę (-y) rzekoma dyskryminacja miała miejsce? Podkreśl jeden lub więcej.

Rasa Wiek Kolor Płeć Język Pochodzenie Niepełnosprawność Odwet

Data (-y) domniemanej dyskryminacji: _____

Proszę przedstawić szczegółowy opis okoliczności zdarzenia, w tym wszelkie dodatkowe informacje (proszę użyć dodatkowych stron w razie potrzeby).

Proszę podać imię/imiona i nazwisko(-a), stanowisko i adres (jeżeli jest znany) osoby dyskryminującej Powoda.

Jeśli możliwe proszę podać nazwiska i dane kontaktowe osób, które mogą mieć wiedzę na temat domniemanego incydentu (-ów) lub są postrzegane jako strony:

Proszę podać gdzie jeszcze zostało złożone to zażalenie:

Potwierdzam, że zapoznałem się z powyższą skargą i że jest wierny mojej najlepszej wiedzy, informacji i przekonań.

Podpis skarżącego	Pełne imię skarżącego	Data
-------------------	-----------------------	------

Podpis osoby wspomagającej	Pełne imię osoby wspomagającej	Data
----------------------------	--------------------------------	------

Data odebrania: _____ otrzymana przez: _____

Appendix E

Title VI Complaint Form Procedure (English, Spanish, and Polish Versions)

Title VI Form Procedure

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

1. Complete and return Title VI Complaint Form to NEPA MPO Title VI Compliance Officer at NEPA MPO, 1151 Oak Street, Pittston, PA 18640, within 180 calendar days from the date of the alleged incident.
2. The complaint will be reviewed and investigated by the NEPA MPO Title VI Compliance Officer.
3. NEPA MPO Title VI Compliance Officer will determine the merit of the claim and (within 15 calendar days) provide the Complainant, and/or the individual assisting complainant, a written acknowledgement that NEPA MPO has either accepted or rejected the complaint.
4. If the Complainant is unsatisfied with the response, the complaint may be presented to the NEPA MPO Policy Board Chairman within 10 calendar days from receiving the response.
5. The NEPA MPO Policy Board Chairman will respond to the Complainant, and/or the Individual Assisting Complainant, within 15 calendar days.
6. If the Complainant is unsatisfied with the response, the investigative report and findings will be reviewed by the NEPA MPO Policy Board and NEPA MPO counsel.
7. A copy of the complaint and the NEPA MPO’s investigative report/findings and remedial action plan, if appropriate, will be issued to the proper federal or State agency (e.g.: FHWA, FTA, and PennDOT) within 120 calendar days of receipt of the complaint.
8. A summary of the complaint and its resolution will be included as part of the Title VI updates to the proper federal or State agency (e.g.: FHWA, FTA, and PennDOT).
9. Records will be available for compliance review audits.

Título VI Procedimiento de Queja

NEPA 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 NEPA MPO, la denuncia será transmitida al estado adecuado o 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.

1. Llene y envie su solicitud a: Title VI Compliance Officer, NEPA MPO, 1151 Oak Street, Pittston, PA 18640 dentro de 180 días calendarios dispues del supuesto incidente.
2. La queja será revisada y examinada por el administrador de NEPA MPO.
3. El Administrador, junto con los miembros del equipo de dirección determinarán el mérito de la queja y (dentro de 15 días calendarios) proporcionara al demandante, y / o al asistente del demandante un reconocimiento por escrito que NEPA MPO tiene ya sea aceptada o rechazada la denuncia.
4. Si el demandante no está satisfecho con la respuesta, la queja puede ser presentada al Presidente de la Junta de Polizas de NEPA MPO dentro de 10 días calendarios a partir de la recepción de la respuesta.
5. El Presidente de la Junta de Polizas de NEPA MPO responderá al demandante y / o al ayudante del demandante dentro de 15 días hábiles.
6. Si el demandante está insatisfecho con la respuesta, el informe de investigación y fallos será revisado por la Junta Directiva NEPA MPO.
7. Una copia de la queja y del reporte de investigación de informes de NEPA MPO y el plan de medidas correctoras, en su caso, se entregarán a la agencia federal o estatal apropiada (por ejemplo: FHWA, FTA, y PennDOT) dentro de los 120 días calendarios de la recepción de la queja.
8. 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).
9. Anotaciones estarán disponibles para auditorías de reviso de cumplimiento.

Artykuł VI Procedura Formularz reklamacyjny

NEPA MPO ma obowiązek potwierdzić otrzymanie skargi i powiadomić skarżącego w terminie 15 dni kalendarzowych od daty otrzymania. Jeżeli skarżący jest niezadowolony z odpowiedzi z NEPA MPO Zgodności, NEPA MPO przekazuje skargę do właściwego stanu lub agencji federalnej-Federal Highway Administration (FHWA), Federal Transit Administration (FTA) lub Pensylwania Departament of Transportation (PennDOT) dla dochodzenia i usposobienie na mocy artykułu VI procedur reklamacyjnych tej agencji.

1. Należy wypełnić i odesłać formularz Title VI reklamacji do NEPA MPO Title VI Compliance Officer at NEPA MPO, 1151 Oak Street, Pittston, PA 18640, w terminie 180 dni kalendarzowych od daty rzekomego incydentu.
2. Reklamacja zostanie sprawdzona i zbadana przez NEPA MPO Title VI Compliance Officer.
3. NEPA MPO Title VI Compliance Officer określi zasadność roszczenia i (w ciągu 15 dni kalendarzowych) zapewniają skarżącemu lub osobie pomagającej skarżącemu, pisemne potwierdzenie, że NEPA MPO zaakceptowała bądź odrzuciła skargę.
4. Jeżeli skarżący jest niezadowolony z odpowiedzi, skarga może być przedstawiona NEPA MPO Policy Board Chairman w terminie 10 dni kalendarzowych od otrzymania odpowiedzi.
5. The NEPA MPO Policy Board Chairman odpowie osobie skarżącej lub osobie pomagającej skarżącemu w ciągu 15 dni kalendarzowych.
6. Jeżeli skarżący jest niezadowolony z odpowiedzi, raport śledczy oraz ustalenia zostaną zweryfikowane przez radę NEPA MPO Policy Board and NEPA MPO.
7. Kopia skargi, NEPA MPO raport śledczy i ustalenia oraz plan działań naprawczych, w stosownych przypadkach, będą wydawane do właściwego federalnego lub stanowego biura (np: FHWA, FTA, a PennDOT) w ciągu 120 dni kalendarzowych od daty otrzymania reklamacji.
8. Podsumowanie skargi oraz rezolucję zostaną uwzględnione w ramach aktualizacji Title VI do właściwego federalnego lub stanowego biura (np: FHWA, FTA, a PennDOT).
9. Zapisy będą dostępne do kontroli przeglądu zgodności.

Appendix F

Language Identification Card & Language Identification Survey

Language Identification Card

IF YOU NEED AN INTERPRETER, PLEASE POINT TO YOUR LANGUAGE

Arabic: Arabic
إذا كنت في حاجة إلى مترجم أشر إلى اللغة المطلوبة.

Language	Text	
Amharic: አማርኛ	አክስ ተስፋዕስ ተስፋዕስ ስለዚ መስቀል የሚያስፈልግ ስለመስጠት ስለመስጠት የሚያስፈልግ ይችላል.	
Armenian: Հայոց	Եթե ուզո՞ւ առարկանի հարիվ ունեք, խնդրում ենք մատուցել ձեռք կը կըսած.	
Burmese: မြန်မာ	အောင် သိ အကျဉ်းချုပ်နှင့်အောင် အသွေးပြု သင့်၏ဘာသာရေးကောင်း အောင်ပါ။	
Croatian: Hrvatski	Ako vam je potreban prevoditelj, pokažite na svoj jezik	
Dutch: Nederlands	Als u een tolk nodig hebt, wijs dan uw taal aan	
Finnish: Suomi	Jos tarvitset tulkin, osoita kielivalintaasi	
French: Français	Si vous avez besoin d'un interprète, indiquez votre langue	
Greek: Ελληνικά	Αν χρειάζεστε διαρμηνέα, παρακαλώ δείξτε τη γλώσσα σας;	
Haitian Creole: Kreyòl ayisyen	Si w bezwen yon entèpèt, montre ki lang ou pale	
Hindi: हिन्दी	वह आपके भाषा अनुवाद की आवश्यकता है, तो अपनी भाषा की ओर इसारा करें।	
Hungarian: magyar	Ha tölmöcsök van szüksége, nézz meg a saját nyelvet	
Japanese: 日本語	通訳が必要な場合は、あなたの言語を指示して下さい	
Korean: 한국어	통역자가 필요하시면 사용하시는 언어를 말씀해 주세요	
Nepali: नेपाली	यदि आपको दोभाषा अवधारणा हो, तो अपनी भाषा की ओर इसारा करें।	
Polish: Polski	Jeśli potrzebujesz tłumacza, wskaz swój język	
Punjabi: ਪੰਜਾਬੀ	ਪੰਜਾਬੀ ਵਿਖੇ ਮੁਹਾਰੀ ਕੀ ਟੇਤ ਹੈ, ਤਾਂ ਵਿਸਤ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿੱਚ ਸੋਚੋ ਕਰੋ।	
Russian: Русский	Если вам нужен переводчик, выберите ваш язык	
Somali: Soomaali	Hadaad u baahas tabay turjumaan, tilmaamo luqadaado	
Swahili: Kiswahili	Ikiwa unahtaji mkalmani, tafidhalii rejeleja lugha yako	
Tagalog: Tagalog	Kung kailangan ninyo ng interpreter or tagasalin, ituro ang inyong wika	
Thai: ภาษาไทย	หากคุณต้องการคนแปลภาษาไทย ให้ชี้ไปที่ภาษาของคุณ	
Urdu: اردو	اگر آپ کو ایک مترجم دریکر ہے، فرمادیں اپنی زبان پر	
Simplified Chinese	Traditional Chinese	
Cantonese	粤语	粵語
Chaochow	潮州话	潮州話
Fukienese	福建话	福建話
Fuzhou	福州话	福州話
Mandarin	普通话	國語
Shanghai	上海话	上海話
Taiwanese	台湾话	台語
Tolshanese	台山话	台山話
Ning Po	宁波话	寧波話
如果您需要译员, 请指向您的语言		

propio language services
Client Service (913) 871-6716

Account # 9284

Language Identification Survey



- | | | |
|--------------------------|--|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Խոսքում ենք նշում կատարեք այս քառակուսում,
եթե խոսում կամ կարդում եք հայերեն։ | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | លើមខេត្តកំណើងប៉ះទេះ ចិន្ទីភាព ប្រឹតិថាយភាសា នេះ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin üntüngnu' manaitai pat üntüngnu' 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 kvadratič 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 نوشتمن فارسی بلد هستید، این مربع را علامت بزنید. | 12. Farsi |

DB-3309

U.S. DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. CENSUS BUREAU

- | | | |
|--------------------------|--|--------------------|
| <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 kazye sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हों 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 megérte vagy beszéli a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenco 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"/> | ໃຫ້ມາບໃຊ້ອ່ອງນີ້ ຕ້າທ່ານອ່ານເຫຼືອການພາສາລາວ. | 24. Laotian |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuję się Pan/Pani językiem polskim. | 25. Polish |

- | | | |
|--------------------------|--|----------------|
| <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"/> | Пометыгте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратик 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 kaya ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้การตอบรับด้วยเครื่องหมายคำในช่องว่าคุณสามารถอ่านหรือเขียนภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітте цю клітинку, якщо ви читаєте 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"/> | באנעיכנט דעם קאסטל אויב איך ליענט אדער רעדט אידיש. | 38. Yiddish |

Appendix G

“One Moment Please” Tool



“One Moment Please” Tool

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

Language:	Written in Language	Phonetic Pronunciation
Albanian:	Nje minutë ju lutem.	nee-yeh mee-noo-teh you loo-tem
Arabic:	لِقْيَةٌ مِنْ فَضْلِكَ	dakika meen fahdlock (masculine) dakika meen fahdlick (feminine)
Chinese:	請稍候	ching show hoe
French:	Un moment s'il vous plaît.	uhn moe-mon seal-voo-play
German:	Einen Moment bitte.	eye-nen moment bee-teh
Gujarati:	મેહરબાની કરીને એક પળ થોભશો	meherbani kariné ek pul thobso
Haitian Creole:	Tanpri tann yon ti moman.	tan-pree tan yaw tee moe-maw
Hindi:	कृपया एक पल पतीक्षा 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

Account # 9284

Appendix H

Telephone-Based Interpretation Service Access Instructions

 **Over-the-phone Interpreting**

Dial the Interpreter:
1-888-804-2044



The auto attendant will prompt:

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

PA Department of Transportation

You will also be asked for:

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

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

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

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

Top Language Code Choices			
Language	code	Language	code
Albanian	47	Karen	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



language services

Account # 9284

TIPS

How to Work with an Over-the-phone interpreter

Your role

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

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

Your interpreter's role

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

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

More questions about over-the-phone interpretation? Contact us at 913-381-3143 or email Interpreter@propo-is.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/>

Watts, Robert

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

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

ALCON,
Interpretation/Translations

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

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

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

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

Appendix J

Community and Agency Contacts

Spanish – Community Contacts

Latino American Alliance of NEPA
Johanna Ortegon, Community Services Coordinator
(570) 420-3725
www.laanepa.org

Latino Task Force of Monroe County
Po Box 347
Mount Pocono, PA 18344

United Neighborhood Centers of Northeastern Pennsylvania
425 Alder Street
Scranton, PA 18505
(570) 346-0759
<http://www.uncnepa.org/>

East Stroudsburg University Modern Languages Department
Jeffrey Ruth
Department Chair
Associate Professor of Modern Languages – Spanish
(570) 422-3419
jruth@esu.edu

Spanish – Church Contacts

Church of Saint Luke
818 Main Street, Stroudsburg, PA
570-421-9097
Tuesday Mass in Spanish at 7pm

Polish – Community Contacts

Polish American Cultural Alliance
Danuta Wilewski
(570) 350-1510,
Homeoffice202@gmail.com

Polish – Church Contacts

Church of Saint Luke
818 Main Street, Stroudsburg, PA
570-421-9097
Sunday Mass in Polish at 2pm

Appendix K

Limited English Proficiency Plan Self-Assessment Checklist

LEP Plan Status	
Is the NEPA 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
LEP Interaction with NEPA MPO	
Has the NEPA MPO interacted with any LEP individuals during the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If so, how many interactions with LEP persons were recorded?	Telephone Call Written Correspondence Office Walk-In At Public Meetings Webpage (e.g. Unique Google Translate users)
Identifying LEP Communities	
Does the NEPA 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 the NEPA MPO's service area analyzed?	Once every _____ years.
What techniques and resources are used by the NEPA MPO to identify LEP communities? (e.g. spatial mapping, community input, etc.)	Describe: _____ _____ _____
What data does the NEPA 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.			

Providing Notice of Language Assistance

How does the NEPA MPO inform the public about the availability of language assistance services (e.g. posters, website, etc.)?	Describe: _____ _____
In what language(s) does the NEPA MPO advertise language assistance services?	1. _____ 2. _____ 3. _____

Providing Language Assistance

For the Safe Harbor LEP populations, what vital documents are translated	1. _____ 2. _____ 3. _____ 4. _____ 5. _____
Does the NEPA MPO offer automated translation services on its website?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, what services are currently used?	<input type="checkbox"/> Google Translate <input type="checkbox"/> Bing Translator <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____

What are the top three (3) languages for which translation are most requested?	1. _____ 2. _____ 3. _____
Training & Staff Resources	
How does the NEPA 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	
Are the LEP Plan and LAP available to the public for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, where are the plans available?	Describe: _____ _____
How often is the LAP updated (i.e., annually, biennially, etc.)?	<input type="checkbox"/> Annually <input type="checkbox"/> Biennially <input type="checkbox"/> Every 3 years <input type="checkbox"/> Every 4 years <input type="checkbox"/> Every _____ years
When was the LAP last updated?	Month _____ Year _____

LEP Interaction Tracking Form
Record of Interactions

Year: _____ Page _____ of _____

Interaction Tracking (<i>to be filled out after each interaction with a 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
Spanish	
Polish	
Other	

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