LACKAWANNA LUZERNE MPO

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

JANUARY 2024

PREPARED FOR:

LACKAWANNA-LUZERNE TRANSPORTATION STUDY MPO

LACKAWANNA COUNTY REGIONAL PLANNING COMMISSION
123 Wyoming Avenue, 5th Floor
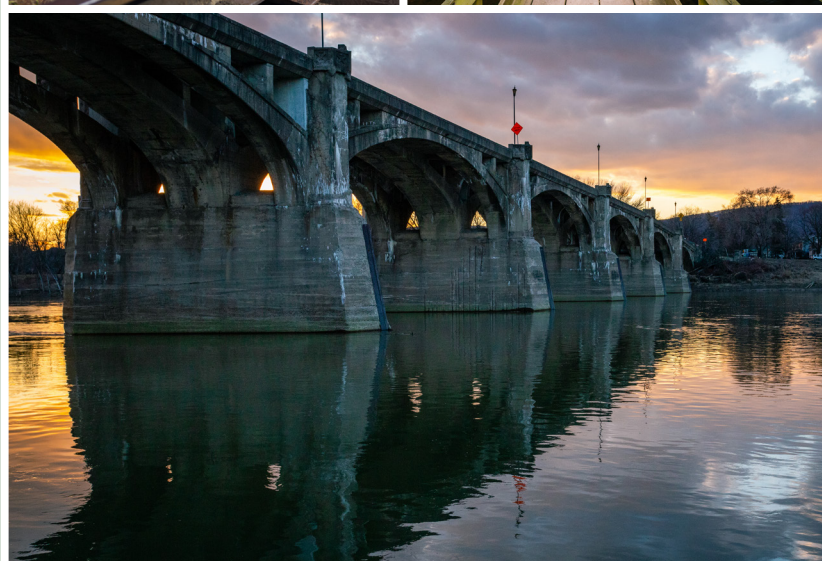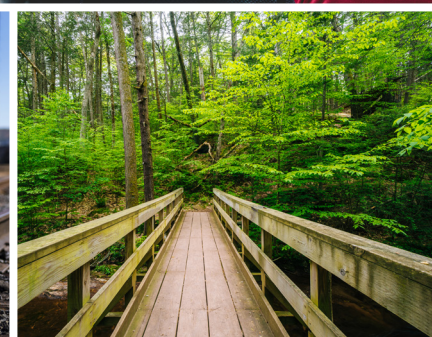Scranton, PA 18503

LUZERNE COUNTY PLANNING COMMISSION
Suite 208, Penn Place
20 North Pennsylvania Avenue
Wilkes-Barre, PA 18711

FINAL PLAN

PREPARED BY:

MICHAEL BAKER INTERNATIONAL
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Harrisburg, PA 17110

Michael Baker
INTERNATIONAL

English
ATTENTION: If you speak another language other than English, language assistance services can be made available to you. Call 1 (570) 825-1589.

Vietnamese
LƯU Ý: Nếu quý vị nói một ngôn ngữ khác không phải tiếng Anh, các dịch vụ hỗ trợ ngôn ngữ có thể được cung cấp cho quý vị. Gọi 1 (570) 825-1589.

Korean
주의: 영어 이외의 다른 언어를 사용하는 경우, 언어 지원 서비스를 이용할 수 있습니다. 1 (570) 825-1589으로 전화하십시오.

French
« ATTENTION : Si vous parlez une autre langue que l'anglais, des services d'assistance linguistique peuvent être mis à votre disposition. Appelez le 1 (570) 825-1589. »

Somali
FIIRO GAAR AH: Haddii aad ku hadasho luqad kale aanan ahayn Ingiriisiga, adeegyada gargaarka luqadda ayaa laguu diyaarin karaa. Wac 1 (570) 825-1589.

Russian
ВНИМАНИЕ: если вы говорите на другом языке, вам может быть оказана языковая помощь. Обратитесь в информационно-справочную службу по номеру: 1 (570) 825-1589.

Ukrainian
УВАГА: якщо ви розмовляєте іншою мовою, вам може бути надана мовна допомога. Зверніться до інформаційно-довідкової служби за номером: 1 (570) 825-1589.

Simplified Chinese
请注意：如果您说英语以外的另一种语言，我们可以为您提供语言帮助服务。 请致电1 (570) 825-1589。

Traditional Chinese
 請注意：如果您說英語以外的另一種語言，我們可以為您提供語言幫助服務。請致電1 (570) 825-1589。

Arabic
تنبيه: إذا كنت تتحدث لغة أخرى غير اللغة الإنجليزية، يمكننا توفير خدمات المساعدة اللغوية لك. اتصل بالرقم 1589 825 (570) 1.

Burmese

သတိပြုရန်- သင်သည် အင်္ဂလိပ် ဘာသာစကား မဟုတ်သော အခြား ဘာသာစကားကို
ပြောလျှင် သင့်အတွက် ဘာသာစကား အကူအညီ ဝန်ဆောင်မှုကို ရနိုင်ပါသည်။ 1
(570) 825-1589 သို့ ခေါ်ဆိုပါ။

Japanese

注意：英語以外の言語を話す場合は、言語支援サービスを利用できるようにすることができます。 電話 1（570）825-1589

Hindi

ध्यान दें:यदि आप अंग्रेजी केअलावा कोई अन्य भाषा बोलते हैं, तो आपको भाषा सहायता सेवाएं उपलब्ध कराई जा सकती हैं। 1 (570) 825-1589 पर कॉल करें

Italian

ATTENZIONE: Se parli una lingua che non sia l'inglese, i servizi di assistenza linguistica possono essere messi a tua disposizione. Chiama 1 (570) 825-1589.

Polish

UWAGA: Jeśli posługujesz się językiem innym niż angielski, możesz skorzystać z usługi pomocy językowej. Zadzwoń pod numer 1 (570) 825-1589.

Nepali

ध्यान दिनुहोस्: यदि तपाईं अंग्रेजीबाहेक अन्य भाषा बोल्नुहुन्छ भने तपाईंलाई भाषा सहायता सेवा उपलब्ध गराउन सिकन्छ। 1 (570) 825-1589 मा फोन गर्नुहोस्।

Urdu

توجّہ دیں :اگر آپ انگریزی کے علاوہ کوئی اور زبان بولتے ہیں تو آپ کی زبان میں مدد کے لیے آپ کو خدمات فراہم کرائی پر کال کریں۔1589-825 570 (1جاسکتی ہیے۔ براہ کرم

Spanish

ATENCIÓN: Si habla otro idioma que no sea inglés, habrá servicios de asistencia en otros idiomas disponibles. Llame al 1 (570) 825-1589.

Greek

ΠΡΟΣΟΧΗ: Εάν μιλάτε άλλη γλώσσα διαφορετική από τα αγγλικά, οι υπηρεσίες γλωσσικής βοήθειας μπορούν να σας διατεθούν. Καλέστε 1 (570) 825-1589.

Table of Contents

Introduction

As defined by the U.S. Department of Transportation, individuals are considered "limited English proficient" (LEP) if they have a limited ability to read, write, speak or understand English. For most people residing in the United States, English is the only language spoken in the home. However, many languages other than English are spoken in homes across the country, state and region.

The regulations established in Title VI of the Civil Rights Act of 1964 and Executive Order 13166: "Improving Access to Services for Persons with Limited English Proficiency" provide the basis for a Limited English Proficiency Plan (LEP Plan). These federal regulations apply to entities receiving federal financial assistance of any kind. As the federally-designated transportation planning organization for Lackawanna and Luzerne Counties, the Lackawanna-Luzerne Transportation Study (LLTS) Metropolitan Planning Organization (MPO) utilizes federal transportation funds from various sources to prepare and maintain various regional transportation plans and programs. As such, the requirements set forth under Title VI of the Civil Rights Act and Executive Order 13166 apply.

What is a Limited English Proficiency (LEP) Plan?

A Limited English Proficiency (LEP) Plan is one of several components that comprise the LLTS MPO's public participation process. The purpose of an LEP plan is to establish a clear strategy that ensures meaningful access to the MPO's planning and decision-making processes by LEP individuals. LLTS MPO is required to develop and maintain an LEP plan in order to be in compliance with Title VI of the Civil Rights Act and other related laws and regulations.

LEP individuals may face language barriers that impede or prohibit access to essential services and programs, information, and planning processes. This includes the planning processes and programs conducted by LLTS MPO. The LEP Plan allows the MPO to identify where LEP populations are geographically located and identifies strategies and initiatives that ensures they receive meaningful access to the MPO's transportation planning and decision-making.

In 2015, the US Department of Transportation updated its Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficiency (LEP) Persons. Originally published in 2005 and updated periodically, the guidance established a Four-Factor Analysis approach to determine a federal funding recipient's obligation to provide LEP services. This plan for the LLTS MPO region was developed to follow the most recent iteration of this guidance.

Non-Discrimination Policy

The MPO is committed to a policy of non-discrimination in the conduct of its business, including its responsibilities for the delivery of equitable and accessible transportation services. It is the MPO's Title VI policy to utilize its best efforts to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs or services. In addition to these groups covered by Title VI, the MPO has a policy to ensure that no person shall be excluded on the grounds of disability, gender, age, or income.

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 presence of LEP populations in their service area and develop a cost-effective, meaningful plan for communications with those populations.

The Four Factors are:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons 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 in the LLTS Region

A comprehensive understanding of language demographics is necessary in order to identify where LEP populations are located within the region as well as the most efficient implementation strategies. Factor 1 evaluates the number of LEP persons served as well as the concentration of LEP persons in a service area population. In the case of LLTS MPO, the service population is the total population within the MPO region – Lackawanna and Luzerne Counties.

Language characteristics within the MPO region were identified using U.S. Census Bureau 2017-2021 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.

The ACS data for the LLTS MPO region also 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, these populations are included in the data summaries and mapping provided in this document.

Total LEP Population in the LLTS MPO Region

Table 1 provides a summary of the LEP populations for all language groups in the LLTS MPO region, in comparison to Pennsylvania statewide. Of the region's total population (5 years and older), 25,578 persons or 5 percent of the total regional population are estimated to be LEP individuals, which falls slightly above the statewide percentage of 4.7 percent. It is also noted that this regional average has increased from the MPO's previous LEP Four Factor Analysis, up from 3.6 percent.

Table 1: LEP Populations for All Language Groups - LLTS and Pennsylvania

	LLTS MPO Region		Pennsylvania	
	Estimate	**% Total Population**	**Estimate**	**% Total Population**
Total Population (5 Years and Older)	512,098		12,285,978	
Total LEP Population *All Language Groups*	25,578	5.0%	577,907	4.7%

Source: ACS 5-Year Estimates (2017-2021), Table S1601

When considering populations by county, Luzerne County's population has a higher proportion of LEP persons compared to Lackawanna County, at 5.6 percent and 4 percent respectively (**Table 2**).

Table 2: Total LEP Populations for All Languages by County

	Lackawanna County		Luzerne County	
	Estimate	**% Total Population**	**Estimate**	**% Total Population**
Total Population (5 Years and Older)	204,333		307,765	
Total LEP Population *All Language Groups*	8,269	4.0%	17,309	5.6%

Source: ACS 5-Year Estimates (2017-2021), Table S1601

Figure 1 illustrates the concentrations (percentage of total population) of LEP persons by Census tract in the region. Higher concentrations of LEP individuals are prevalent in the region's major cities and surrounding areas, including Hazleton, Scranton, and Wilkes-Barre.

Limited English Proficiency Households

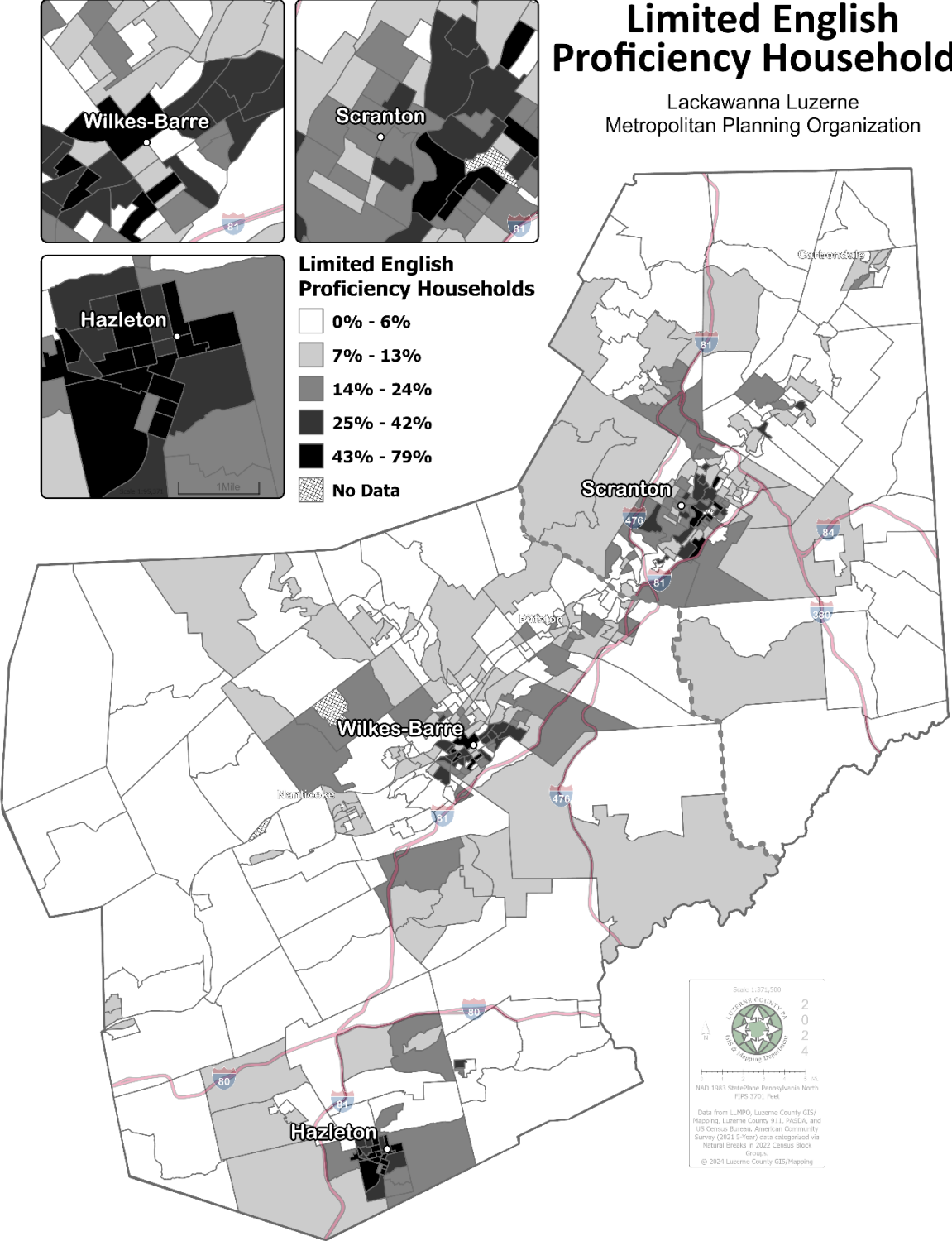Lackawanna Luzerne
Metropolitan Planning Organization

Limited English Proficiency Households

- 0% - 6%
- 7% - 13%
- 14% - 24%
- 25% - 42%
- 43% - 79%
- No Data

Figure 1: Limited English Proficiency Concentrations

Most Prominent LEP Language Groups in the LLTS Region

Table 3 summarizes population data for the five (5) most populous LEP language groups in the LLTS MPO region.

Table 3: Most Populous LEP Language Groups

	LLTS MPO Region	
	Population Estimate (5 Years and Over)	% Total Population
Total Population	512,098	
LEP Language Groups - *Speak English "less than very well"*		
Spanish	19,390	3.79%
Other Indo-European Languages	2,821	0.55%
Other Asian and Pacific Island Languages	756	0.15%
Chinese (incl. Mandarin, Cantonese)	599	0.12%
Arabic	569	0.11%

Source: ACS 5-year Estimates (2017-21)

"Safe Harbor" Qualified LEP Populations

The United States Department of Transportation (USDOT) threshold for addressing language needs is called the "Safe Harbor" provision that states, all "vital documents" should be accessible to LEP populations with more than 1,000 people who face language barriers in the region or make up at least 5 percent of the total regional population (whichever is less). Offering translations of these documents is generally considered "strong evidence" for LEP compliance, but it can also be achieved with fewer translated materials depending on the MPO's resources and cost of translation services.

Analyzing data at the Census tract level allows for better understanding of where LEP populations are located in the LLTS MPO region, including those that potentially qualify for "Safe Harbor" treatment. In the LLTS MPO region, the Spanish LEP population makes up less than 5 percent of the regional population; however, has over 1,000 speakers in the region. Therefore, the Spanish LEP group would trigger the Safe Harbor provision. While the "Other Indo-European Languages" group exceeds the 1,000 persons threshold, the category encompasses more than one language group and is not distinguishable as a single language; therefore, the Safe Harbor provision is not triggered.

Figure 2 show the distribution of Spanish LEP persons according to population and concentration, respectively by census tract. By count, the populations of Spanish LEP persons are generally located in and around the region's urban areas. Municipalities with higher Spanish LEP populations include:

- **Lackawanna County:** City of Scranton, Dunmore Borough, Old Forge Borough, Olyphant Borough, Taylor Borough

- **Luzerne County:** Butler Township, Edwardsville Borough, Forty Fort Borough, Freeland Borough, Hanover Township, City of Hazleton, Hazle Township, West Hazleton Borough, Jackson Township, City of Wilkes-Barre

Similarly, municipalities near the region's urban areas also have concentrations of Spanish LEP individuals that either match or exceed the MPO's regional average of 3.8 percent. These municipalities include:

- **Lackawanna County:** City of Scranton, Dunmore Borough

- **Luzerne County**: City of Wilkes-Barre, Plymouth Borough, Nanticoke Township, City of Hazleton, West Hazelton, Hazle Township, Freeland Borough

Table 4: Spanish Language LEP Populations

	Total Population	Spanish Language LEP	
		Speak English "less than very well"	% of Total Population
Lackawanna County	204,333	4,318	2.11%
Luzerne County	307,765	15,072	4.90%
Regional Total	**512,098**	**19,390**	**3.79%**

Source: ACS 5-year Estimates (2017-21)

In addition to Spanish language LEP concentrations, other populous language group concentrations are shown in **Figures 3 through 5**.

Spanish Language Spoken
(Limited English Proficiency)

Lackawanna Luzerne
Metropolitan Planning Organization

Limited English Proficiency
(Spanish Spoken)

- 0% - 2%
- 3% - 6%
- 7% - 12%
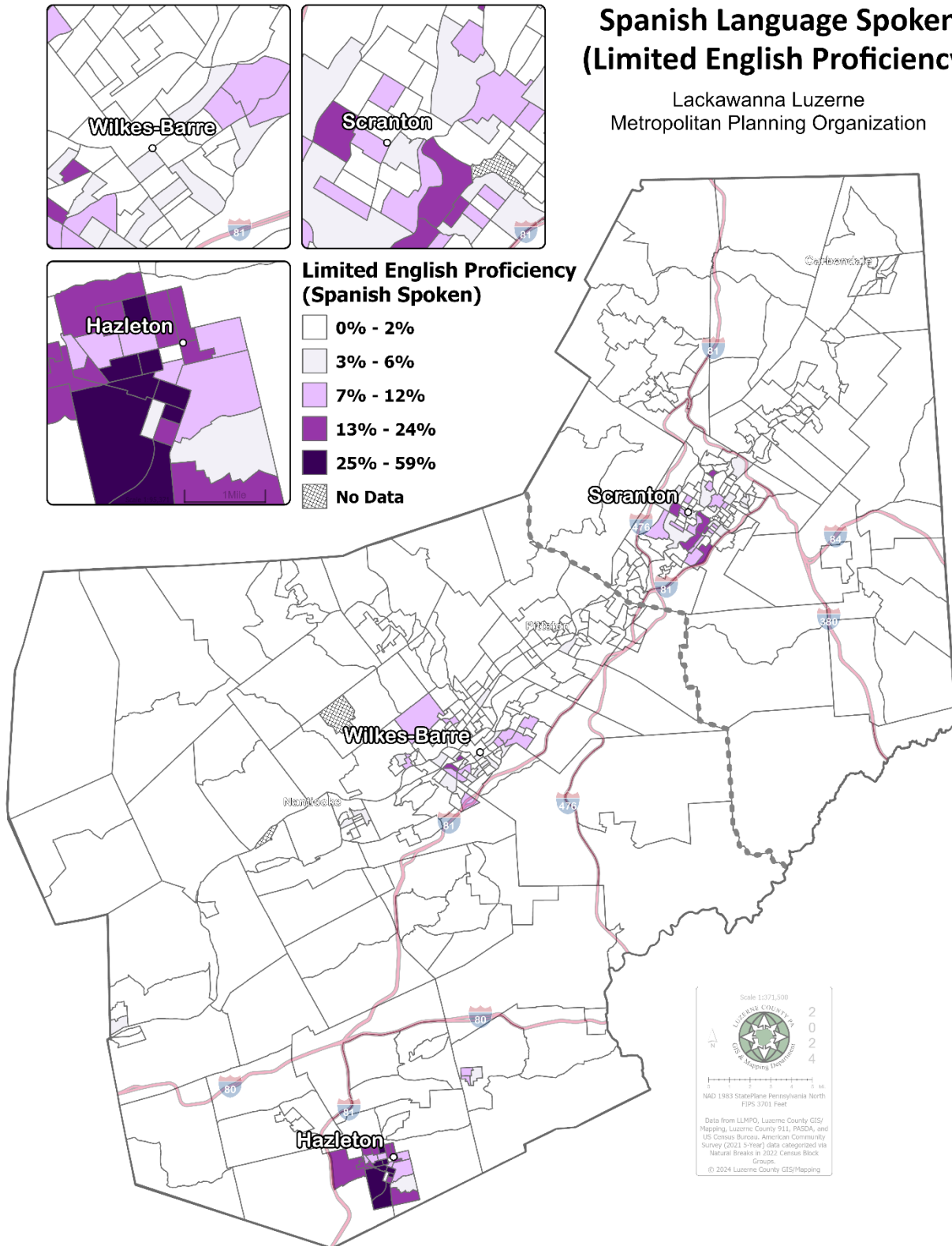- 13% - 24%
- 25% - 59%
- No Data

Figure 2: Spanish Speaking Limited English Proficiency Concentrations

Other Indo-European Languages Spoken (Limited English Proficiency)

Lackawanna Luzerne
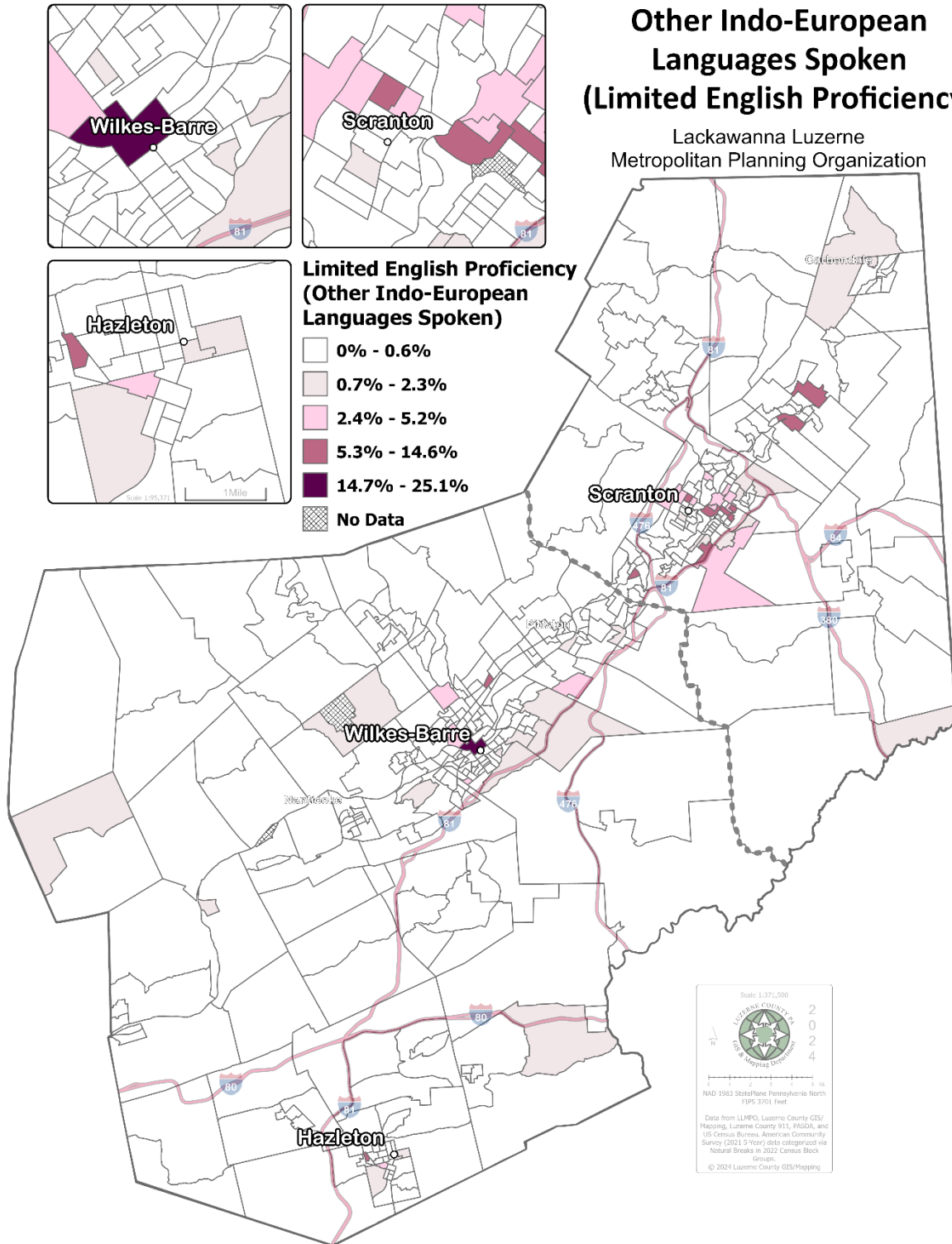Metropolitan Planning Organization

Limited English Proficiency (Other Indo-European Languages Spoken)

- 0% - 0.6%
- 0.7% - 2.3%
- 2.4% - 5.2%
- 5.3% - 14.6%
- 14.7% - 25.1%
- No Data

Figure 3: Other Indo-European Languages - Limited English Proficiency Concentrations
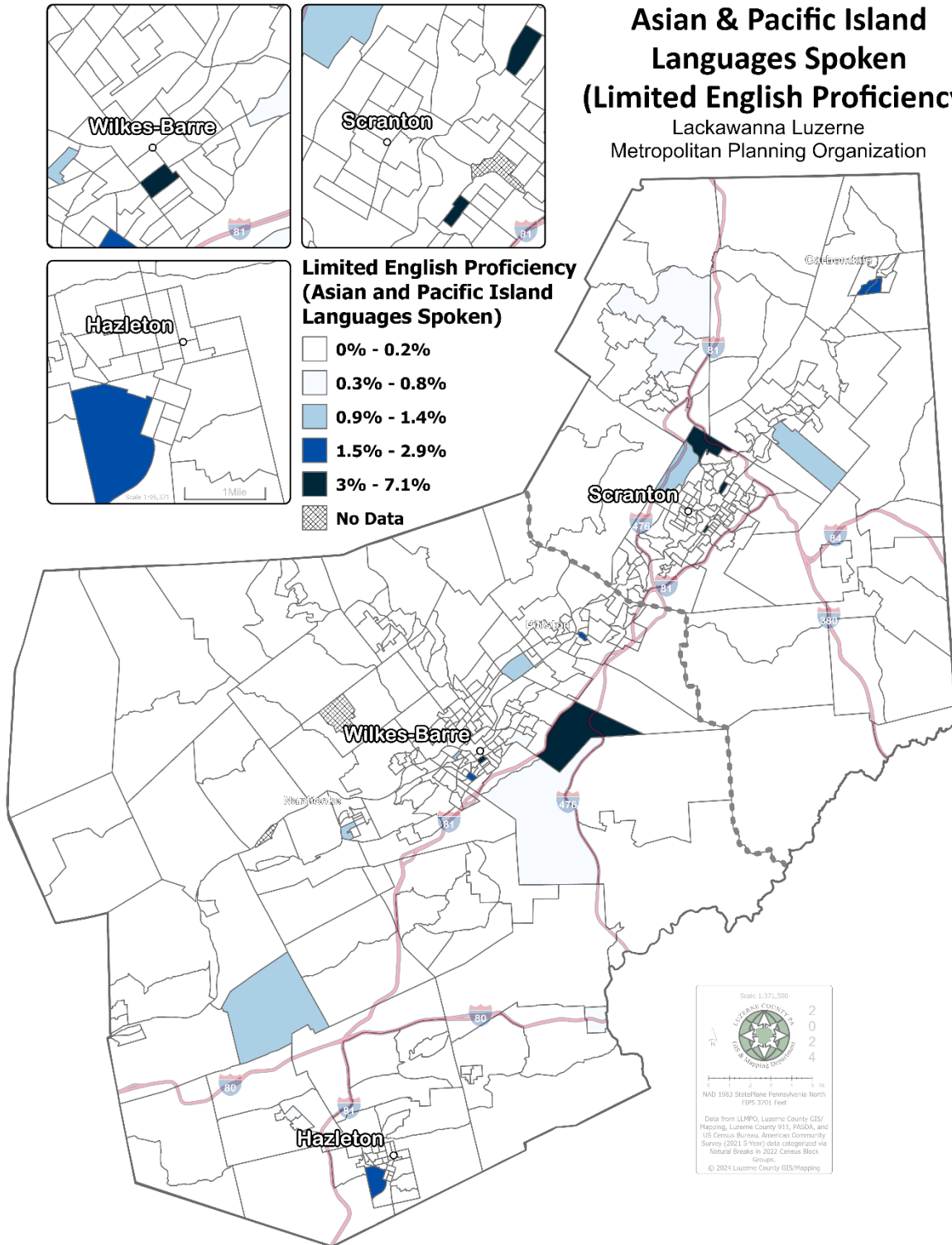
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Figure 4: Asian and Pacific Island Languages - Limited English Proficiency Concentrations

Other Languages Spoken
(Limited English Proficiency)

Lackawanna Luzerne
Metropolitan Planning Organization

**Limited English Proficiency
(Other languages Spoken)**

- 0%
- 0.1% - 1.7%
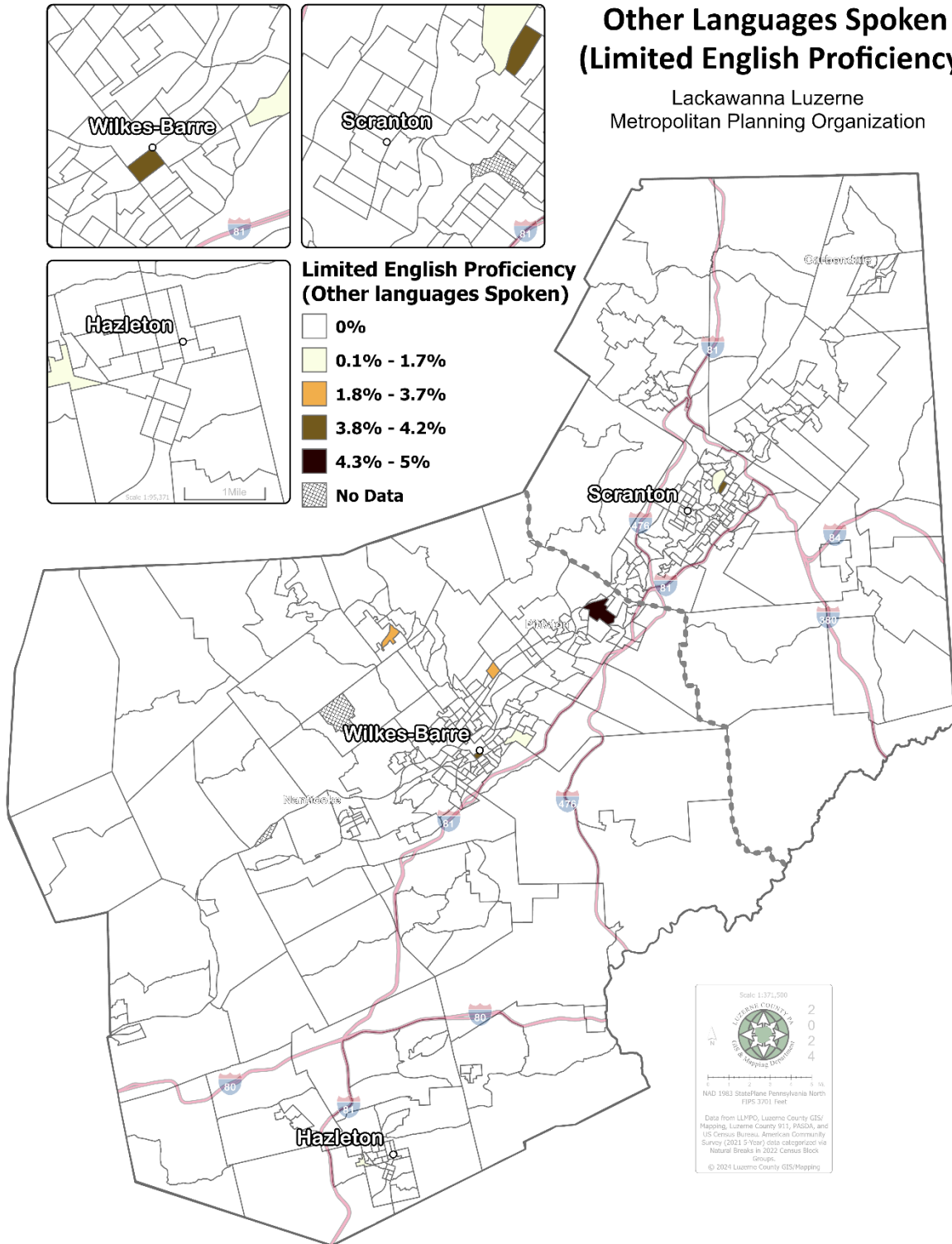- 1.8% - 3.7%
- 3.8% - 4.2%
- 4.3% - 5%
- No Data

Figure 5: Other Languages Spoken - Limited English Proficiency Concentrations

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 programs and initiatives is largely unknown.

Since the adoption of the previous LEP plan in 2016, the LLTS MPO has had the following interactions with LEP populations:

Formal Complaints

- The MPO has not received any formal complaints related to Limited English Proficiency or national origin discrimination since 2016.

Translation or Interpretation Service Requests

- The MPO has not had any requests for document translation or translation services for public meetings since 2016.

Public Input Received in a Language Other Than English

- Since the adoption of the MPO's previous LEP plan, the MPO staff have not received any public input in languages other than English on any of its planning documents or initiatives.

The MPO is prepared to assist LEP persons when they come in contact with the MPO's program and planning efforts. By understanding how LEP individuals interact with the MPO's programs and planning efforts, any gaps or areas of improvement can be identified, and outreach can be expanded.

## Factor 3 – Nature and Importance of MPO Programs, Activities, and Services

While the LLTS MPO does not provide a direct transportation service, it develops and maintains a wide variety of planning documents and programs that guide investments in the regional transportation network, including but not limited to:

Long Range Transportation Plan and Joint Comprehensive Plan

Transportation Improvement Program
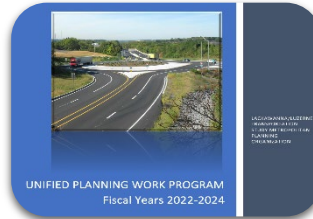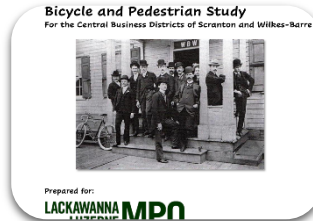

Unified Planning Work Program

Public Participation Plan

Congestion Management Process

Coordinated Public Transit-Human Services Transportation Plan

Active Transportation Plans and Studies

Special Studies

Investments in transportation infrastructure have an impact on those living, working, and visiting the Lackawanna Luzerne region, regardless of income, poverty status, or language barriers. Most notably, the Transportation Improvement Program (TIP) represents a four-year investment plan for the region's multimodal transportation infrastructure. Similarly, the MPO's Long Range Transportation Plan (LRTP) includes an investment portfolio that is comprised of projects programmed on the TIP and the Twelve-Year Program (TYP) as well as long-range projects up to 20 years into the future. In addition to infrastructure investment planning, some individuals may not have access to an automobile and may rely on other modes such as transit, walking, or biking to access essential services and be involved in their community. Plans and studies that address these modes and services are of high importance to LEP populations and the regional population at large.

The MPO recognizes the impacts that its planning efforts, programs, and initiatives may have on the quality and accessibility of the transportation network within Lackawanna and Luzerne Counties. Therefore, LLTS MPO is committed to taking the necessary steps to ensure that its plans and programs are accessible to LEP communities and prioritizing easy and ample opportunities for LEP individuals to participate in its planning processes and programs.

Factor 4 – Available Resources and Costs of Language Assistance Services

The MPO accounts for adherence to adopted public involvement procedures and compliance with Environmental Justice and Title VI requirements as part of its Unified Planning Work Program (UPWP), specifically under *Task 1: Administration*. At this time, the 2022-24 UPWP allocates $90,000 each year to this task, which includes other essential MPO administrative functions (e.g., quarterly reporting and invoicing, UPWP update, annual obligation reporting, MPO meeting administration, website maintenance, etc.).

With this in mind, it is recognized that the MPO has limited capital resources to dedicate the LEP services. The MPO does have dedicated staff available at each county office to facilitate interactions with LEP individuals and will leverage low-cost or free services and automated techniques to provide translation and interpretation, upon request. The MPO staff also includes one individual who is bilingual and assists with Spanish translation and communication needs on an as-needed basis.
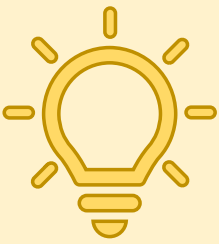
Recommendation

Estimate the cost to translate "vital documents" and set aside dedicated funds as part of the UPWP.

Budgets can be estimated based on past translation history or quotes from a preferred translation provider. Any remaining funds at the end of each year could be dedicated to translating other "non-vital" documents, improving overall LEP accessibility to the MPO's planning documents and programs.

Language Assistance Measures

To remain compliant with Title VI of the Civil Rights Act and Executive Order 13166 as well as consistent with USDOT Guidance, the LLTS MPO is committed to implementing the necessary measures that make the MPO's plans, programs, and other activities accessible to LEP individuals. These measures are outlined and documented through the development of a Language Assistance Plan (LAP). These measures address both oral and written language assistance tools, resources, and services.

According to the Safe Harbor Provision, the LEP plan formally addresses accommodations for LEP persons who speak or read Spanish. Immediate assistance for Spanish interpretation as well as other languages may be provided if an available service can accommodate the requested language (e.g., on-demand telephone interpretation, language identification card, local interpreters, etc.)

Language Assistance Tools and Resources

Identification of LEP Individuals

In addition to the results of the Four-Factor Analysis conducted as part of this plan, LLTS MPO will document and evaluate all requests for translation services, regardless of format (e.g., phone, email, in-person, etc.) to further identify language needs and determine whether language assistance may be needed at future meetings or as part of other planning activities.

Language Identification Flashcards

The U.S. Census' Language Identification Card is a one-page tool that states: *"If you need an interpreter, please point to your language."* This statement is translated into a number of languages, and the individual in need of assistance can point to the language to indicate their interpretation needs. Each language is also identified in English to the right of the page, allowing an English-speaking person to accurately request interpretation services and engage an interpreter quickly. A sample Language Interpretation Card is provided in Appendix A.

This tool may be used at public meetings and events to allow LEP individuals to "self-identify" themselves. The LLTS MPO will keep flashcards available at entry points for meetings open to the public (e.g., sign-in or registration stations).

Collaboration with Local Community Organizations

Community groups or individuals that cater to Spanish-speaking or other LEP persons provide an excellent conduit for facilitating participation. They can assist LEP persons at meetings and other planning activities. A listing of known local community organizations and contacts is provided in the MPO's public participation plan.

Notice and Advertisement of Language Assistance Services

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

- 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

- Distribution of written and email notices to interested parties in their requested language

As part of its 2016 LEP update, the MPO developed a *Notice of Language Services* in both English and Spanish to be integrated into its communications as well as its webpage as a central location for disseminating information about the MPO's plans and programs. This notice can be found in Appendix B.

> ### Recommendation
>
> *Integrate the Notice of Language Services into the updated MPO website and other central locations for disseminating information.*
>
> As part of its 2016 LEP update, the MPO developed a *Notice of Language Services* in both English and Spanish to be integrated into its communications as well as its webpage as a central location for disseminating information about the MPO's plans and programs. The website does not currently feature this notice; however, it could be featured adjacent to existing automated tools (e.g., Google Translate). The Notice can also be featured at front desks of the Lackawanna and Luzerne County Planning offices and other publicly accessible areas.

Certain planning activities may require more intensive outreach. The MPO may also use the following measures to provide transparency and access to LEP populations:

- Design and distribute informational materials about LLTS MPO and its planning efforts (e.g., social media posts in LEP languages, flyers, posters, brochures, bus advertisements)
- Radio or public service announcements in Spanish
- Provision of real-time translation services at public meetings or events with the use of headsets
- Presenting information at community organizations frequented by LEP individuals

Digital/Web-Based Translations

Many planning agencies, including LLTS MPO, are taking steps to move many of its documents and materials online. In addition to written translation, other measures can be taken to ensure LEP accessibility in the digital space.

Automated Translation Tools

Online-based, automated translation services such as Google Translate or Bing Translator provide on-demand translation among multiple languages, as well as an application programming interface (API) that may be integrated into existing webpages. The LLTS MPO website leverages automated translation services through Google Translate to translate webpage content into Spanish by clicking a "Translate to Spanish" button at the top of the screen. Upon selection, a new tab is opened, and the same webpage appears in Spanish. A Google Translate toolbar also appears at the top of the new screen, allowing for translation into other languages.

Recommendation

Improve the transparency of online translation options as major updates are made to the MPO website.

The LLTS MPO website has a clear option for Spanish translation; however, to those who speak other LEP languages in the region, it may not be clear that this button also allows access to the other languages available through Google Translate. Providing additional guidance or clarification, online LEP accessibility and use of Google Translate or other tools used as part of future website updates can be greatly improved.
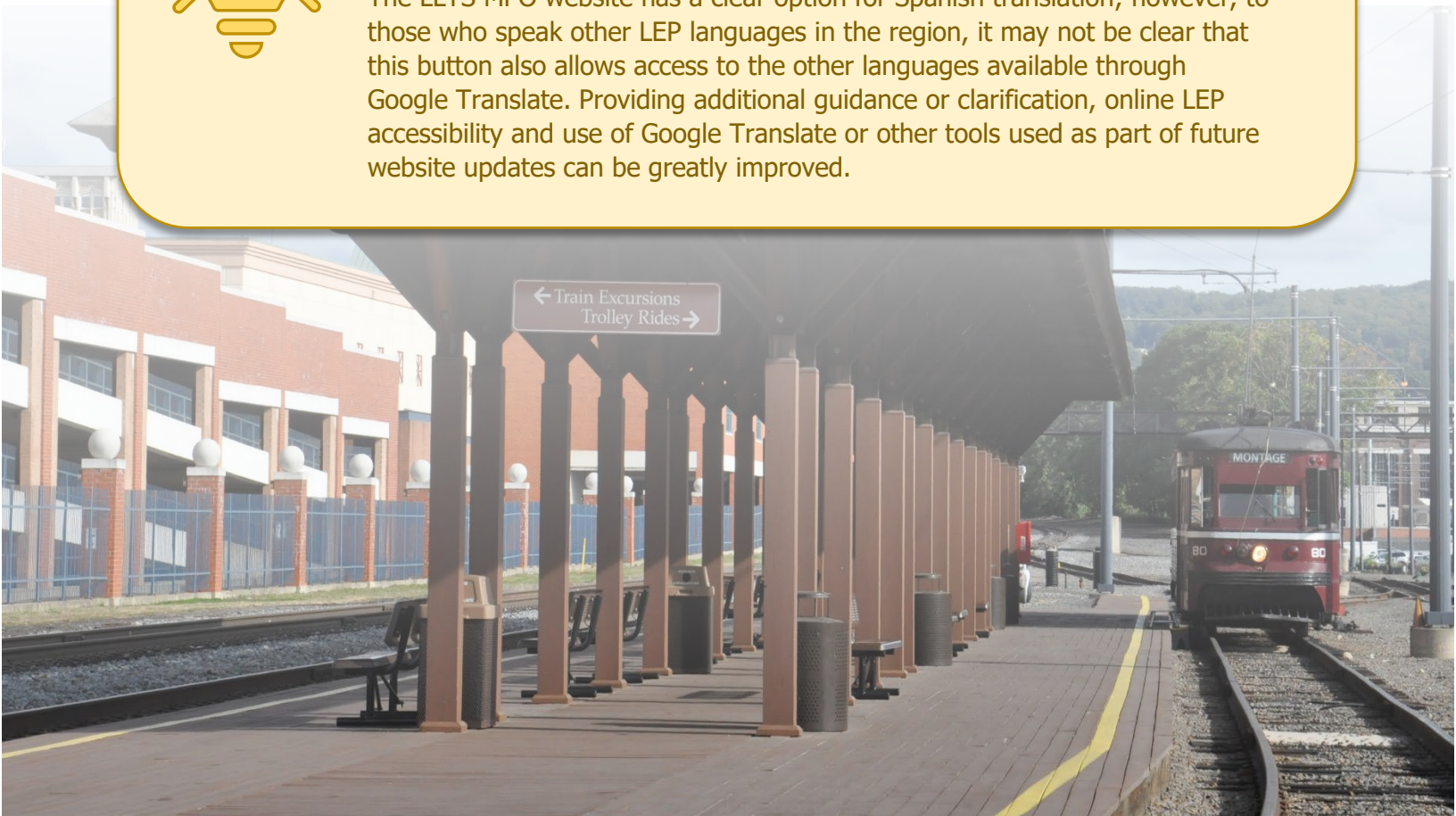
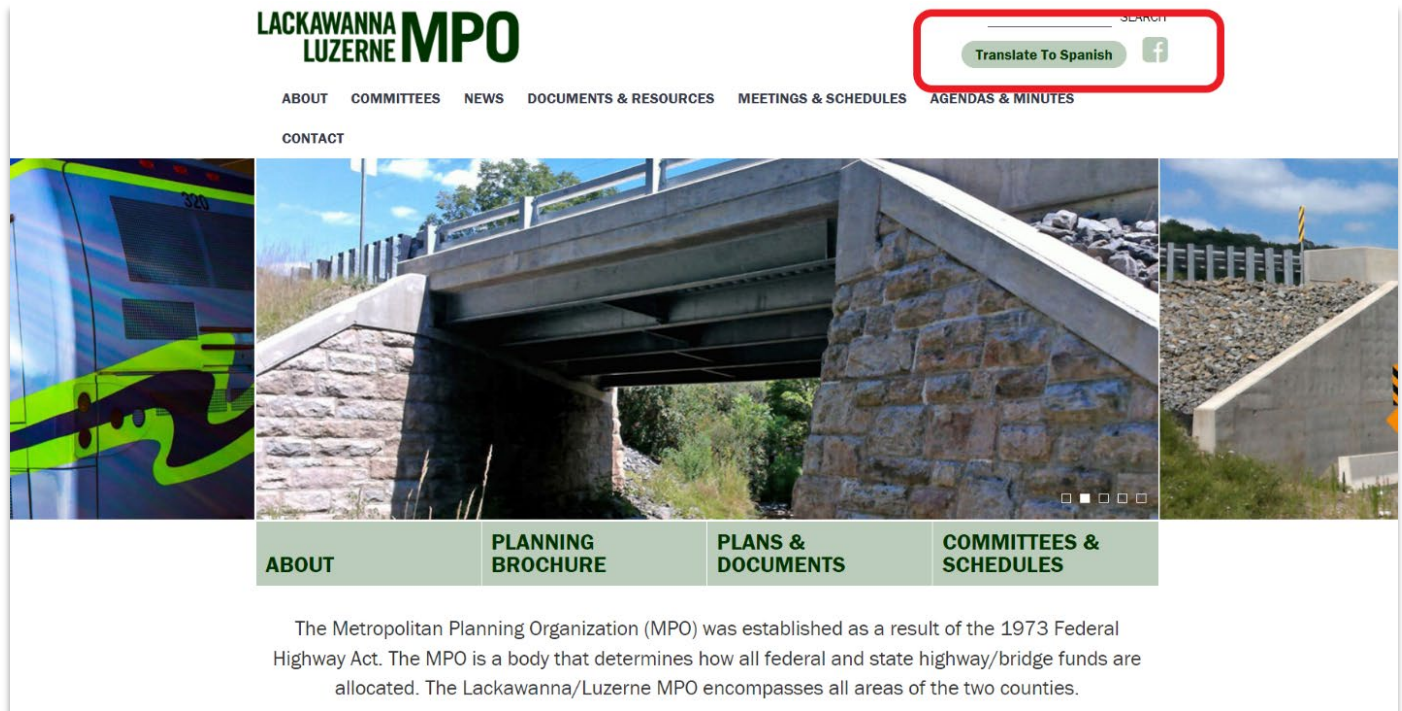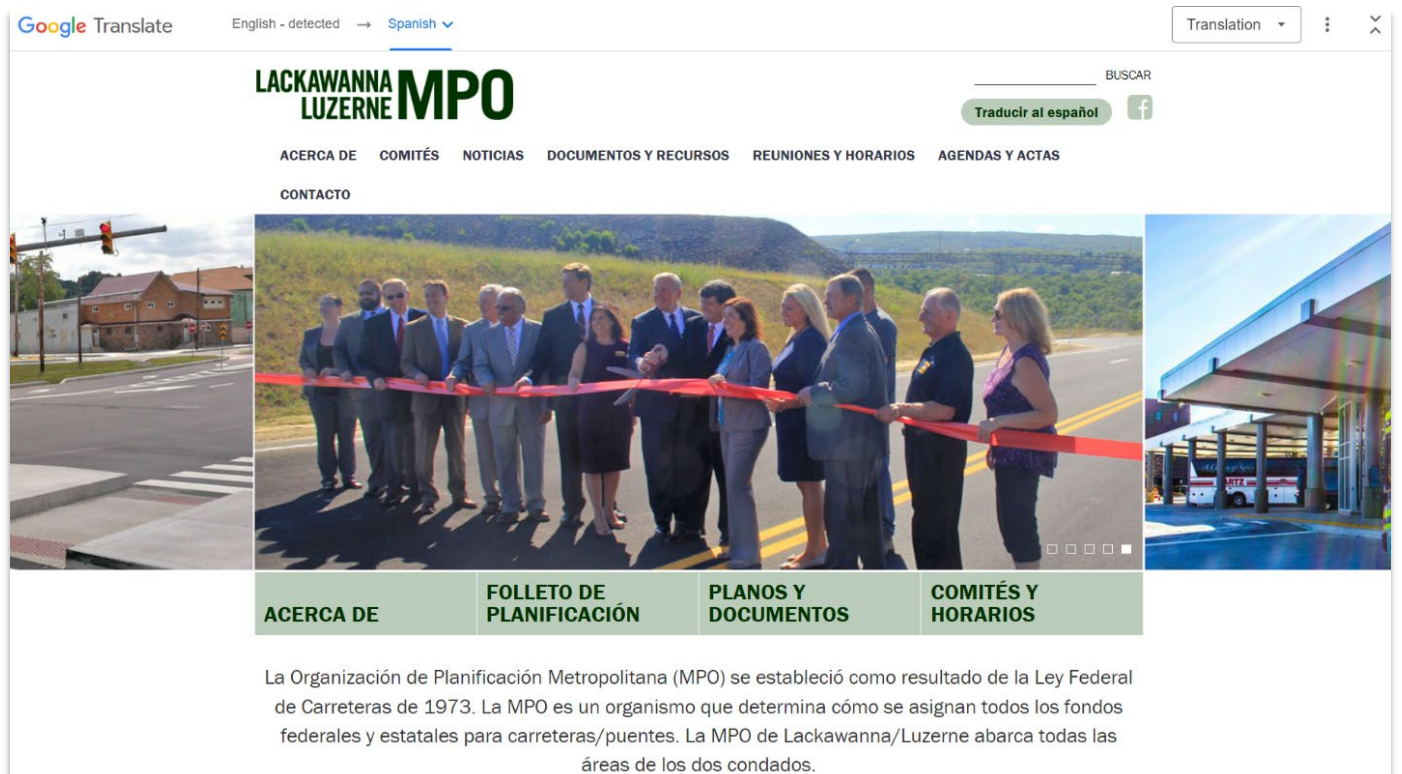*Figure 6: LLTS MPO Webpage - "Translate to Spanish" Button*

Figure 7: LLTS MPO Webpage Translated to Spanish

Interpretation Services

As applicable, the LLTS MPO will acquire oral language interpretation services as necessary. While the MPO does not have a contract with a specific professional service, several are available to assist in public engagement efforts and are included in Appendix C. The MPO may also coordinate with PennDOT District 4-0 staff to potentially access Propio Language Services. Additionally, other bilingual interpreters, community volunteers, or LEP family members or friends may be used as a resource for an LEP individual based on their preferences.

Recommendation

Develop and include a "language assistance" statement as part of the MPO's meeting agendas as well as other notices and planning documents.

The LLTS MPO meetings are open to the public with an agenda posted to the website ahead of the meeting. The MPO has an opportunity to include a "language assistance statement" in this agenda, identifying services available and how to obtain them. This statement could be provided in both English and Spanish.

Translation Services for Written Materials

In addition to automated translation tools, human translation services are available both locally within the LLTS region and through internet-based translation businesses with nationwide reach. A list of providers is documented in Appendix D.

Human-translation is required for "vital documents" in order for the MPO to be in compliance with the Safe Harbor provision. For the LLTS region, these documents must be human-translated and made available in Spanish. The LLTS MPO considers vital documents to be those that convey critical information to the public or are required by law or federal regulation. Based on this definition, the MPO will consider vital documents to include:

- Title VI Policy, Complaint Procedures, and Complaint Forms
- Annual MPO Meeting Schedule
- Notices for Public Meetings

Additionally, the following documents will be condensed into an "Executive Summary" format and will have those documents translated into Spanish, or will be translated in their entirety (based on document size and complexity):

- Long-Range Transportation Plan

- Transportation Improvement Program
- Environmental Justice Summary
- Public Participation Plan
- Limited English Proficiency Plan

Vital documents will be made available in other alternative languages and formats, if requested. Other documents not considered "vital" may also be made available in alternative languages and formats, if requested. These documents will be made available in print and online.

Public Meeting Notices

The LLTS MPO circulates advertisements in advance for all meetings open to the public through various means. This includes legal ads, press releases, website updates, social media posts, and email blasts to its stakeholders and other interested parties as outlined in the MPO's Public Participation Plan (PPP).

The MPO will also provide notice of translation or interpretation services in all public meeting advertisements in both English and Spanish. This could be done by including the MPO's Notice of Language Services or a more abbreviated "language assistance statement", guiding LEP individuals to necessary resources. The MPO also uses the following text in English and Spanish as a way to communicate the availability of these services:

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

Written Communication (Paper and Electronic)

Upon the receipt of a written communication by mail or other physical means (e.g., fax, etc.), the LLTS MPO staff will reach out to a translation service to identify the language in which the correspondence is written and translate into English. Similarly, emails and other electronic correspondence may be received in languages other than English. In addition to contracted translation services, the MPO could also leverage automated translation tools such as Google Translate to detect the language used and translate accordingly. It is important to note, however, these tools may not be the entirely accurate in their translations.

Should the inquiry require a response, the MPO may also work with a translation service in order to respond accordingly in the individual's language. A list of translation providers is located in Appendix D. Human translation is the preferred method in crafting responses to inquiries and concerns. Working with a contracted translation service ensures that these responses are translated accurately while also communicated correctly and effectively. If an immediate response is needed or a message is simple, automated tools could be used.

Recommendation

Use "plain language" wherever possible to ensure easy translation of both online and written materials.

Staff Training

All LLTS MPO staff members will be trained on the elements of the LEP plan to ensure that the plan is successfully implemented and that LEP populations are provided access to MPO planning processes and programs. Upon adoption of this plan, the MPO staff will revisit *the LEP Employee Resources Manual* and other LEP training materials by updating them accordingly. Employees should be trained in the content of the LEP plan, particularly the measures used to respond to LEP requests and the protocols in place to ensure procedures are followed.

These training materials should include the following:

- An overview of the MPO's LEP plan and associated policies
- Staff roles and responsibilities in the implementation of the LEP plan
- Guidance on how to provide notice of language services to LEP individuals
- Tips on communicating with LEP individuals over the phone or in-person

Each county office will maintain a binder of language assistance materials so they can be accessed quickly should a translation request be made by phone or in-person.

In addition to in-house training materials, LLTS MPO staff shall participate in training opportunities offered by the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and PennDOT when available and possible.

Implementing, Monitoring, and Updating the LEP Plan

The MPO will review and update the LEP plan every five years or in line with an update of the Public Participation Plan to ensure that reasonable efforts are made to identify and address the needs of any additional LEP populations. Future updates will include a revised Four Factor Analysis with a review of updated LEP demographic data from the U.S. Census American Community Survey (ACS) and updated documentation of the number of LEP persons encountered and their spoken language.

In addition to data analysis, the MPO will track any language assistance requests received as well as the use of language assistance tools and resources between LEP updates. This provides the opportunity to revise existing or add new language assistance measures to fill in any necessary gaps if existing efforts are not meeting the needs of the MPO's LEP populations.

On an annual basis, the LLTS MPO should update contact lists for LEP and Title VI stakeholders, assess the availability of existing language assistance resources, and explore the potential costs of any additional tools and resources.

Appendices

Appendix A: US Census Language Identification Card

☐ ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.

1. Arabic

☐ Խնդրում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:

2. Armenian

☐ যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।

3. Bengali

☐ ឈ្មបបញ្ជាក់ក្នុងប្រអប់នេះ៖ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។

4. Cambodian

☐ Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.

5. Chamorro

☐ 如果你能读中文或讲中文，请选择此框。

6. Simplified Chinese

☐ 如果你能讀中文或講中文，請選擇此框。

7. Traditional Chinese

☐ Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.

8. Croatian

☐ Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.

9. Czech

☐ Kruis dit vakje aan als u Nederlands kunt lezen of spreken.

10. Dutch

☐ Mark this box if you read or speak English.

11. English

☐ اگر خواندن و نوشتن فارسي بلد هستید، این مربع را علامت بزنید.

12. Farsi

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

☐ Assinale este quadrado se você lê ou fala português. 26. Portuguese

☐ Însemnaţi această căsuţă dacă citiţi sau vorbiţi românește. 27. Romanian

☐ Пометьте этот квадратик, если вы читаете или говорите по-русски. 28. Russian

☐ Обележите овај квадратић уколико читате или говорите српски језик. 29. Serbian

☐ Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. 30. Slovak

☐ Marque esta casilla si lee o habla español. 31. Spanish

☐ Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. 32. Tagalog

☐ ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย. 33. Thai

☐ Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. 34. Tongan

☐ Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою. 35. Ukranian

☐ اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگا ئیں ۔ 36. Urdu

☐ Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. 37. Vietnamese

☐ באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. 38. Yiddish

Appendix B: Notice of Language Services (English and Spanish)

The LLTS MPO provides language interpretation and document translation services upon request. If your preferred language is not English, please allow us to learn of 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 assistance is sought.

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 assistance is sought.

By Written Correspondence
When writing correspondence to the LLTS MPO, please write in your preferred language. Address paper correspondence to LLTS MPO, 123 Wyoming Avenue, 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. Translations in other languages can be made available upon request.

<div align="center">***</div>

ATTENTION: If you speak another language other than English, language assistance services can be made available to you. Call 1 (717) 412-5300.

ATENCIÓN: Si habla otro idioma que no sea inglés, habrá servicios de asistencia en otros idiomas disponibles. Llame al 1 (717) 412-5300.

تنبيه: إذا كنت تتحدث لغة أخرى غير اللغة الإنجليزية، يمكننا توفير خدمات المساعدة اللغوية لك. اتصل بالرقم 412 5300 (717) 1.

请注意：如果您说英语以外的另一种语言，我们可以为您提供语言帮助服务。 请致电1 (717) 412-5300。

LACKAWANNA LUZERNE ESTUDIOA DE TRANSPORTE ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (LLTS MPO)
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 le ayude le pedirá que espere un momento mientras busca ayuda.

Por teléfono
Si desea llamar a LLTS MPO, por favor llame al (570) 963-6400 o al (570) 825-1564 y solicite su idioma preferido. Si la persona que atiende su llamada no puede entender su solicitud, le pedirá que espere un momento mientras busca ayuda.

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, 123 Wyoming Avenue, 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 traducidosestán disponibles en copia impresa a través de la oficina de LLTS MPO.

***

ATTENTION: If you speak another language other than English, language assistance services can be made available to you. Call 1 (717) 412-5300.

ATENCIÓN: Si habla otro idioma que no sea inglés, habrá servicios de asistencia en otros idiomas disponibles. Llame al 1 (717) 412-5300.

تنبيه: إذا كنت تتحدث لغة أخرى غير اللغة الإنجليزية، يمكننا توفير خدمات المساعدة اللغوية لك. اتصل بالرقم 412 5300 (717) 1.

请注意：如果您说英语以外的另一种语言，我们可以为您提供语言帮助服务。 请致电1 (717) 412-5300。

Appendix C: Translation and Interpretation Service Providers

<u>Recommended Regional Providers:</u>

- Quantum, Inc.
  240 South 9th Street
  Philadelphia, PA 19107
  https://www.quantumtranslations.com/

- Cetra
  7804 Montgomery Avenue, Suite 10
  Elkins Park, PA 19027
  https://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

<u>Web-Based National & International Providers:</u>

- inWhatLanguage
  https://inwhatlanguage.com/

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

Appendix D: Language Taglines

English
ATTENTION: If you speak another language other than English, language assistance services can be made available to you. Call 1 (570) 825-1589.

Vietnamese
LƯU Ý: Nếu quý vị nói một ngôn ngữ khác không phải tiếng Anh, các dịch vụ hỗ trợ ngôn ngữ có thể được cung cấp cho quý vị. Gọi 1 (570) 825-1589.

Korean
주의: 영어 이외의 다른 언어를 사용하는 경우, 언어 지원 서비스를 이용할 수 있습니다. 1 (570) 825-1589으로 전화하십시오.

French
« ATTENTION : Si vous parlez une autre langue que l'anglais, des services d'assistance linguistique peuvent être mis à votre disposition. Appelez le 1 (570) 825-1589. »

Somali
FIIRO GAAR AH: Haddii aad ku hadasho luqad kale aanan ahayn Ingiriisiga, adeegyada gargaarka luqadda ayaa laguu diyaarin karaa. Wac 1 (570) 825-1589.

Russian
ВНИМАНИЕ: если вы говорите на другом языке, вам может быть оказана языковая помощь. Обратитесь в информационно-справочную службу по номеру: 1 (570) 825-1589.

Ukrainian
УВАГА: якщо ви розмовляєте іншою мовою, вам може бути надана мовна допомога. Зверніться до інформаційно-довідкової служби за номером: 1 (570) 825-1589.

Simplified Chinese
请注意：如果您说英语以外的另一种语言，我们可以为您提供语言帮助服务。 请致电1 (570) 825-1589。

Traditional Chinese
 請注意：如果您說英語以外的另一種語言，我們可以為您提供語言幫助服務。請致電1 (570) 825-1589。

Arabic
تنبيه: إذا كنت تتحدث لغة أخرى غير اللغة الإنجليزية، يمكننا توفير خدمات المساعدة اللغوية لك. اتصل بالرقم 1589 825 (570) 1.

Burmese

သတိပြုရန်- သင်သည် အင်္ဂလိပ် ဘာသာစကား မဟုတ်သော အခြား ဘာသာစကားကို ပြောလျှင် သင့်အတွက် ဘာသာစကား အကူအညီ ဝန်ဆောင်မှုကို ရနိုင်ပါသည်။ 1 (570) 825-1589 သို့ ခေါ်ဆိုပါ။

Japanese

注意：英語以外の言語を話す場合は、言語支援サービスを利用できるようにすることができます。 電話 1（570）825-1589

Hindi

ध्यान दें: यदि आप अंग्रेजी के अलावा कोई अन्य भाषा बोलते हैं, तो आपको भाषा सहायता सेवाएं उपलब्ध कराई जा सकती हैं। 1 (570) 825-1589 पर कॉल करें।

Italian

ATTENZIONE: Se parli una lingua che non sia l'inglese, i servizi di assistenza linguistica possono essere messi a tua disposizione. Chiama 1 (570) 825-1589.

Polish

UWAGA: Jeśli posługujesz się językiem innym niż angielski, możesz skorzystać z usługi pomocy językowej. Zadzwoń pod numer 1 (570) 825-1589.

Nepali

ध्यान दिनुहोस्: यदि तपाईं अंग्रेजीबाहेक अन्य भाषा बोल्नुहुन्छ भने तपाईंलाई भाषा सहायता सेवा उपलब्ध गराउन सकिन्छ। 1 (570) 825-1589 मा फोन गर्नुहोस्।

Urdu

توجّہ دیں: اگر آپ انگریزی کے علاوہ کوئی اور زبان بولتے ہیں تو آپ کی زبان میں مدد کے لیے آپ کو خدمات فراہم کرائی جاسکتی ہیں۔ براہ کرم 1 (570)1589-825 پر کال کریں۔

Spanish

ATENCIÓN: Si habla otro idioma que no sea inglés, habrá servicios de asistencia en otros idiomas disponibles. Llame al 1 (570) 825-1589.

Greek

ΠΡΟΣΟΧΗ: Εάν μιλάτε άλλη γλώσσα διαφορετική από τα αγγλικά, οι υπηρεσίες γλωσσικής βοήθειας μπορούν να σας διατεθούν. Καλέστε 1 (570) 825-1589.