

LIMITED ENGLISH PROFICIENCY (LEP) ACCESS PLAN

MPO Adopted – November 20, 2019

LEP Section of Title VI Program
for the
Montachusett Metropolitan Planning Organization
and the
Montachusett Regional Planning Commission

MONTACHUSETT

REGIONAL PLANNING COMMISSION

Offices: 464 Abbott Ave., Leominster, Massachusetts 01453
(978) 345-7376 Fax: (978) 348-2490

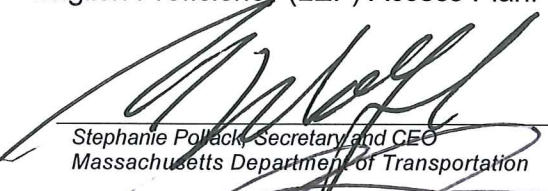



Montachusett Metropolitan Planning Organization Endorsement of the 2019 Update to the Montachusett Limited English Proficiency (LEP) Access Plan

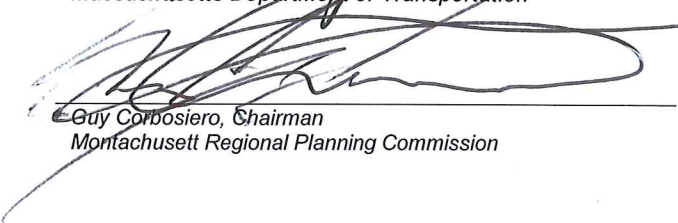
The Montachusett Metropolitan Planning Organization (MMPO) has completed its review of the 2019 Update to the Montachusett Limited English Proficiency (LEP) Access Plan as well as all comments received and determined that it adequately address federal regulations and policies.


The Montachusett Metropolitan Planning Organization (MMPO) has developed the Limited English Proficiency (LEP) Plan to identify reasonable steps needed to provide language assistance for LEP persons who seek meaningful access to MPO programs, as required by Executive Order 13166, in the Montachusett Region.

Therefore, the Committee of Signatories representing the Montachusett Metropolitan Planning Organization (MMPO) by a majority vote hereby endorses the 2019 Update to the Montachusett Limited English Proficiency (LEP) Access Plan.


Stephanie Pollack, Secretary and CEO
Massachusetts Department of Transportation


for Jonathan Gulliver, Administrator
Massachusetts Department of Transportation Highway Division


Guy Corbisiero, Chairman
Montachusett Regional Planning Commission

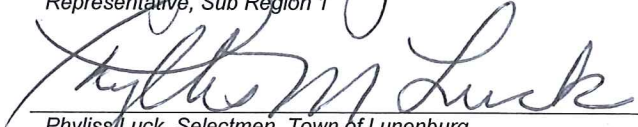

for Dean Mazzarella, Chairman
Montachusett Regional Transit Authority


Mark Hawke, Mayor
City of Gardner


for Stephen DiNatale, Mayor
City of Fitchburg


Barbara Anderson, Selectmen, Town of Winchendon
Representative, Sub Region 1


Rosemarie Meissner, Selectmen, Town of Ashburnham
Representative, Sub Region 2


Phyllis Luck, Selectmen, Town of Lunenburg
Representative, Sub Region 3


Stanley B. Starr, Jr., Selectmen, Town of Lancaster
Representative, Sub Region 4

11/20/2019

Date

Table of Contents

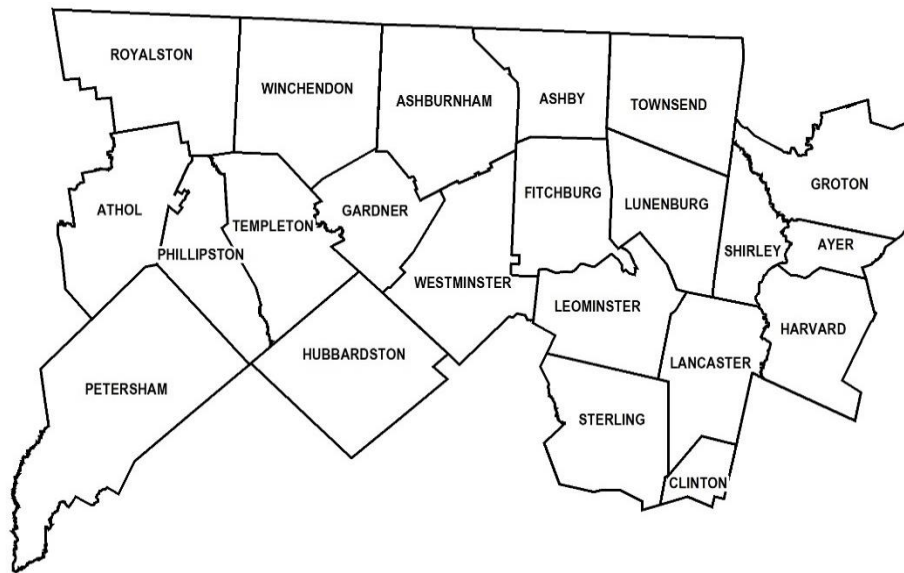
TABLE OF CONTENTS	1
I. INTRODUCTION	2
II. PLAN SUMMARY	3
III. LEP IMPLEMENTATION PLAN	7
<i>LEP Population Identification</i>	<i>7</i>
<i>How to identify persons who may need language assistance</i>	<i>7</i>
<i>Language Assistance Measures.....</i>	<i>7</i>
<i>MPO Staff Training</i>	<i>7</i>
<i>Monitoring and Updating the LEP Plan</i>	<i>8</i>
<i>Dissemination of the MPO Limited English Proficiency Plan</i>	<i>8</i>
LEP PLAN ATTACHMENTS	9
ATTACHMENT 1- MAPS	10
ATTACHMENT 2- SELF-ASSESSMENT FORM	16

Version History

Version	Date	Description	Prepared By
1.0	12/12/12	Original	S. Bean
1.1	2/13/13	Final – MPO Adopted	S. Bean
2.0	11/20/19	Update – MPO Adopted	S. Bean

I. Introduction

The Montachusett Regional Planning Commission (MRPC) is in its fifth decade of providing technical planning assistance to its 22 member communities. Located in north central Massachusetts, the MRPC was formed in 1968 under the State Enabling Legislation Massachusetts General Law Chapter 40B and is one of thirteen regional planning agencies across the Commonwealth. Our purpose is to carry out comprehensive planning in the Montachusett Region, an area of approximately 685 square miles that is home to some 242,671 individuals.



The Montachusett Metropolitan Planning Organization (MMPO) was established through federal and state regulations to meet requirements that metropolitan areas have a "3C" (Continuing, Comprehensive and Cooperative) transportation planning process that results in plans and programs that consider all transportation modes and supports metropolitan community development and social goals. The role of the MMPO is to perform all functions required by federal and state laws and regulations. Signatory members of the MMPO include the mayors of Fitchburg, Leominster and Gardner, representatives of four sub-regions of the Montachusett Region as well as the Secretary and CEO of MassDOT, the Highway Administrator of MassDOT, the Chair of the MRPC and the Chair of the Regional Transit Authority (i.e. the Montachusett Regional Transit Authority (MART)).

The Montachusett Metropolitan Planning Organization (MMPO) is committed to assisting individuals, for whom English is not their primary language, understand and have access to MPO programs, activities or services. Language for many Limited English Proficiency (LEP) individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by federally funded programs and activities.

Based on the most up to date and detailed language breakdown data available (2010-2015 American Community Survey – 5-year estimates), most individuals living in the United States read, write, speak and understand English. There are many individuals, however, for whom English is not their primary language. For instance, based on the 2010-2015 American Community Survey – 5-Year Estimates, 8.57% (or 25.4 Million people) of the United States population age 5 and older (or 296.5 Million people) speak English less than very well. Of those individuals; 64.17% speak Spanish, 6.8% speak Chinese, 3.38% speak Vietnamese, 2.41% speak Korean and 2.12% speak Tagalog.

	Total Population Over 5	Speaks English Less Than Very Well (ELTVW)	Spanish or Spanish Creole ELTVW	Chinese ELTVW	Vietnamese ELTVW	Korean ELTVW	Tagalog ELTVW
United States of America	296,603,003	25,410,756 8.57%	16,305,893 64.17%	1,726,921 6.80%	859,295 3.38%	613,011 2.41%	538,482 2.12%

2010-2015 American Community Survey – 5 Year Estimates

Executive Order 13166 “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons with Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

II. Plan Summary

The Montachusett Metropolitan Planning Organization (MMPO) has developed this Limited English Proficiency (LEP) Plan to identify reasonable steps to provide language assistance for LEP persons who seek meaningful access to MPO programs as required by Executive Order 13166.

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

In developing the plan, and while determining the MPO’s extent of obligation to provide LEP services, the MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

1.) The number or proportion of LEP persons eligible in the service area or who are likely to encounter an MPO program, activity or service.

The MPO examined the 2010-2015 American Community Survey – 5 Year Estimates and was able to determine that approximately 4.55% (or 10,352 people) of the MRPC population age five and older speak English less than very well (ELTVW) which is considered the Limited English Proficiency (LEP) population. The majority of those individuals reside in Shirley, Fitchburg, and Leominster (respectively). The block group data, when broken down for Shirley, shows that the data increases drastically in the southern block group which also houses the Correctional Facilities. This block group has the ELTVW as over 16% where the remaining block groups average 3.3%. This helps to explain why Shirley is the top community for ELTVW. The communities of Clinton and Harvard also have a high LEP population of above 4%. Harvard is also likely to be affected by the Correctional Facilities where the northwest block group shows 8%+ for ELTVW and the remainder of the block groups average 2.9%. The 2010-2015 American Community Survey – 5 Year Estimates dataset has the most up to date language break down available at this time. The 2017 data is also available but it does not include a specific language breakdown.

Table 1 - Population Age 5+ Who Speak English Less Than Very Well

Community	Total Pop. Age 5+	Speaks English Less Than Very Well	% Speaks English Less Than Very Well
Ashburnham	6,005	0	0.00%
Ashby	3,077	33	1.07%
Athol	11,079	87	0.79%
Ayer	7,345	232	3.16%
Clinton	12,873	648	5.03%
Fitchburg	37,575	3,305	8.80%
Gardner	19,122	614	3.21%
Groton	10,583	151	1.43%
Harvard	6,296	268	4.26%
Hubbardston	4,348	24	0.55%
Lancaster	7,676	235	3.06%
Leominster	38,956	3,311	8.50%
Lunenburg	10,644	222	2.09%
Petersham	1,183	14	1.18%
Phillipston	1,606	16	1.00%
Royalston	1,265	12	0.95%
Shirley*	7,125	664	9.32%
Sterling	7,246	146	2.01%
Templeton	7,668	42	0.55%
Townsend	8,628	126	1.46%
Westminster	7,104	33	0.46%
Winchendon	9,920	169	1.70%
MRPC Region Total	227,324	10,352	4.55%
United States Total	296,603,003	25,410,756	8.57%

2010-2015 American Community Survey – 5 Year Estimates

* The block group data, when broken down for Shirley, shows that the data increases drastically in the southern block group which also houses the Correctional Facilities. This block group has the ELTVW as over 16% where the remaining block groups average 3.3%. This helps to explain why Shirley is the top community for ELTVW.

Of that 4.55% LEP population; the largest groups are the Spanish-speakers (58.65% or 6,071 people), followed distantly by French (7.11% or 736 people), Portuguese (6.48% or 671 people), Chinese (2.71% or 281), and Hmong (2.53% or 262). See breakdown below in Table 2.

Table 2 – Language Breakdown of Those Who Speak English Less Than Very Well (ELTVW)

Community	Total Population Over 5	Speaks English Less Than Very Well (ELTVW)	Spanish or Spanish Creole ELTVW	French ELTVW	Portuguese ELTVW	Chinese ELTVW	Hmong ELTVW
Ashburnham	6,005	0	0	0	0	0	0
Ashby	3,077	33	26	0	0	0	0
Athol	11,079	87	39	9	12	0	0
Ayer	7,345	232	34	21	39	0	0
Clinton	12,873	648	404	0	107	0	0
Fitchburg	37,575	3,305	2,287	98	20	102	140
Gardner	19,122	614	238	187	19	51	0
Groton	10,583	151	22	5	0	62	0
Harvard	6,296	268	85	10	0	34	0
Hubbardston	4,348	24	0	0	0	8	0
Lancaster	7,676	235	68	19	37	0	0
Leominster	38,956	3,311	2,173	111	373	10	63
Lunenburg	10,644	222	82	70	0	0	0
Petersham	1,183	14	0	0	6	8	0
Phillipston	1,606	16	0	7	0	0	0
Royalston	1,265	12	0	0	6	6	0
Shirley	7,125	664	450	83	0	0	0
Sterling	7,246	146	59	32	8	0	0
Templeton	7,668	42	6	22	0	0	0
Townsend	8,628	126	0	0	44	0	59
Westminster	7,104	33	0	33	0	0	0
Winchendon	9,920	169	98	29	0	0	0
TOTALS	227,324	10,352	6,071	736	671	281	262
Percentage	-	-	58.65%	7.11%	6.48%	2.71%	2.53%

2010-2015 American Community Survey – 5 Year Estimates

2.) The frequency with which LEP individuals come into contact with an MPO program

The MPO assesses the frequency at which staff has or could possibly have contact with LEP persons. Since the last LEP update in 2013, the MPO received zero requests for an interpreter and zero requests for translated MPO documents. The MPO has the potential to come into contact with LEP populations on a regular basis through its regular planning activities and meetings. Announcements related to the development of the Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), and Regional Transportation Plan (RTP) are disseminated in both English and Spanish. These documents are posted to the MRPC website. The MRPC website also has the MRPC, MPO and Montachusett Joint Transportation Committee (MJTC) meeting information posted along with Google Translate to assist with instant translations when needed.

3.) The nature and importance of this program, activity or service provided by the MPO to the LEP population;

The Montachusett Regional Planning Commission (MRPC) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the

Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within MRPC's Title VI Programs consistent with federal interpretation and administration. Additionally, MRPC provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

An important part of the development process for the Regional Transportation Plan (RTP) is public outreach and involvement. To obtain this, several methods were utilized in an attempt to bring as many individuals as possible into the plan development. This included updates at several meetings, targeted emails, online and hard copy surveys and web-based applications. Additionally, during the development of other planning documents, notice of applicability and linkage to the RTP were identified and incorporated.

Through the efforts of the Community Health Network of North Central Massachusetts (CHNA9), MRPC has partnered with other local organizations to identify the transportation needs throughout the region and work collaboratively towards addressing these needs. By working with CHNA9, we have increased our public outreach by utilizing their contact lists and working with an array of organizations and individuals.

The largest LEP population resides in Leominster and Fitchburg. Although the MPO has not conducted any formal targeted outreach efforts to identify which MPO programs would be of importance to a LEP person, it can be assumed that the programming, prioritization and development of projects for the highway network through the TIP development would be of interest and important to the LEP population. The Montachusett Regional Transit Authority (MART) has their own LEP plan which identifies many services available within these LEP neighborhoods as well as having many bi-lingual staff who can translate when needed.

MRPC recently conducted a variety of transportation needs surveys for both transit riders and non-riders. Some surveys were broken down into specific categories such as workforce, higher education, medical and seniors/disabled. In order to reach as many populations as possible, these surveys were translated into Spanish, which is the top non-English language within the Montachusett Region. The survey results showed that three Spanish surveys had been completed out of a total of 1,240 surveys.

4.) The resources available to the MPO and overall costs to provide LEP assistance.

The MPO assessed its available resources that could be used for providing the LEP assistance. This included identifying what staff and volunteer language interpreters are readily available, how much a professional interpreter and translation service would cost, and which documents should be translated, taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts, examining which financial and in-kind sources could be used to provide assistance, and what level of staff training is needed.

After analyzing the four factors, the MPO developed the plan outlined in the following section for assisting persons of limited English Proficiency.

III. LEP IMPLEMENTATION PLAN

LEP Population Identification

The Census definition of a Limited English Proficient (LEP) person is "...a person who speaks another language other than English at home and does not speak English well or not at all." MRPC, in our analysis, included all persons who "speaks English less than very well." This analysis of the 2010-2015 American Community Survey – 5 Year Estimates data showed that 13.6% of the population speaks a language other than English at home but 4.55% (or 10,352 people) speak a language other than English at home and speak English less than very well making it our total LEP population. As previously stated in Table 2, of that 4.55% LEP population; the largest groups are the Spanish-speakers (58.65% or 6,071 people), followed distantly by French (7.11% or 736 people), Portuguese (6.48% or 671 people), Chinese (2.71% or 281), and Hmong (2.53% or 262). More detailed language information can be available upon request.

How to identify persons who may need language assistance

1. Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
2. For public meetings in which members of this community are specifically addressed, include a request for translator in the invitations sent to constituents;
3. Have the Census Bureau's "I Speak Cards" at all workshops and conference sign-in tables. While a translator may not be present at that particular meeting, the cards will help the MPO anticipate future needs.
4. Post a notice of available language translation assistance at MPO reception area.
5. Confer and share information with local partner organizations serving the LEP individuals in the community.

Language Assistance Measures

To date, the MPO has not received language translation inquiries for a language other than English. If someone does request assistance, staff members will take the name and number of the person and MRPC will make arrangements with a volunteer or staff member who can translate. Staff may be able to assist with Spanish or Arabic written communications and some MPO document translation requests from LEP persons.

MRPC will work towards establishing an Environmental Justice Working Committee to meet biannually, or more frequently if needed, to discuss the MPO's programs and how information may best be disseminated to the LEP, low income/minority populations and how to gather input from these groups.

The Title VI Compliant Form has been translated into Spanish, French and Portuguese and is posted on the MRPC website.

MPO Staff Training

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities;
- What language assistance services the MPO offers;
- Use of LEP “I Speak Cards”;
- How to access a staff interpreter;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on the MPO’s LEP program responsibilities and their obligation to provide language assistance.
- Provide translation of literature/materials to the community upon request when feasible.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP populations in the Montachusett region?
- Has there been a change in the types of languages where translation services are needed?
- Is there a change in need of language assistance?
- Have the MPO’s available resources, such as technology, staff, and financial costs, changed?
- Has the MPO fulfilled the goals of the LEP plan?
- Where any complaints received?

The MPO will also fill out the “LEP Self-Assessment” form. (Attachment 2)

Dissemination of the MPO Limited English Proficiency Plan

The MPO will post the LEP Plan on its website at www.mrpc.org

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without internet access, copies of the LEP plan will be provided to all libraries and dissemination will follow the Public Participation Plan. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to:

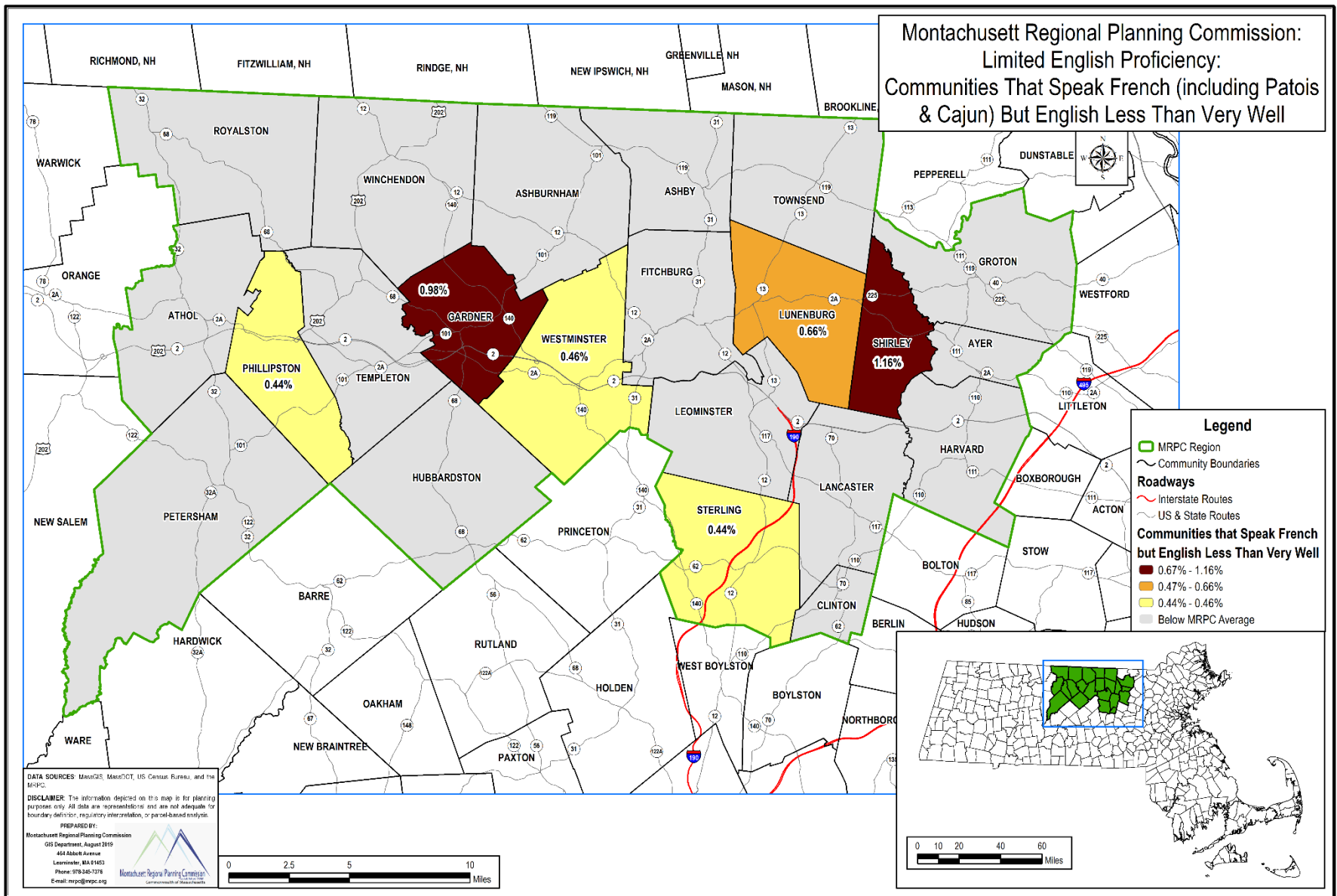
Montachusett Regional Planning Commission
Attn: Title IV/LEP
464 Abbott Avenue
Leominster, MA 01453

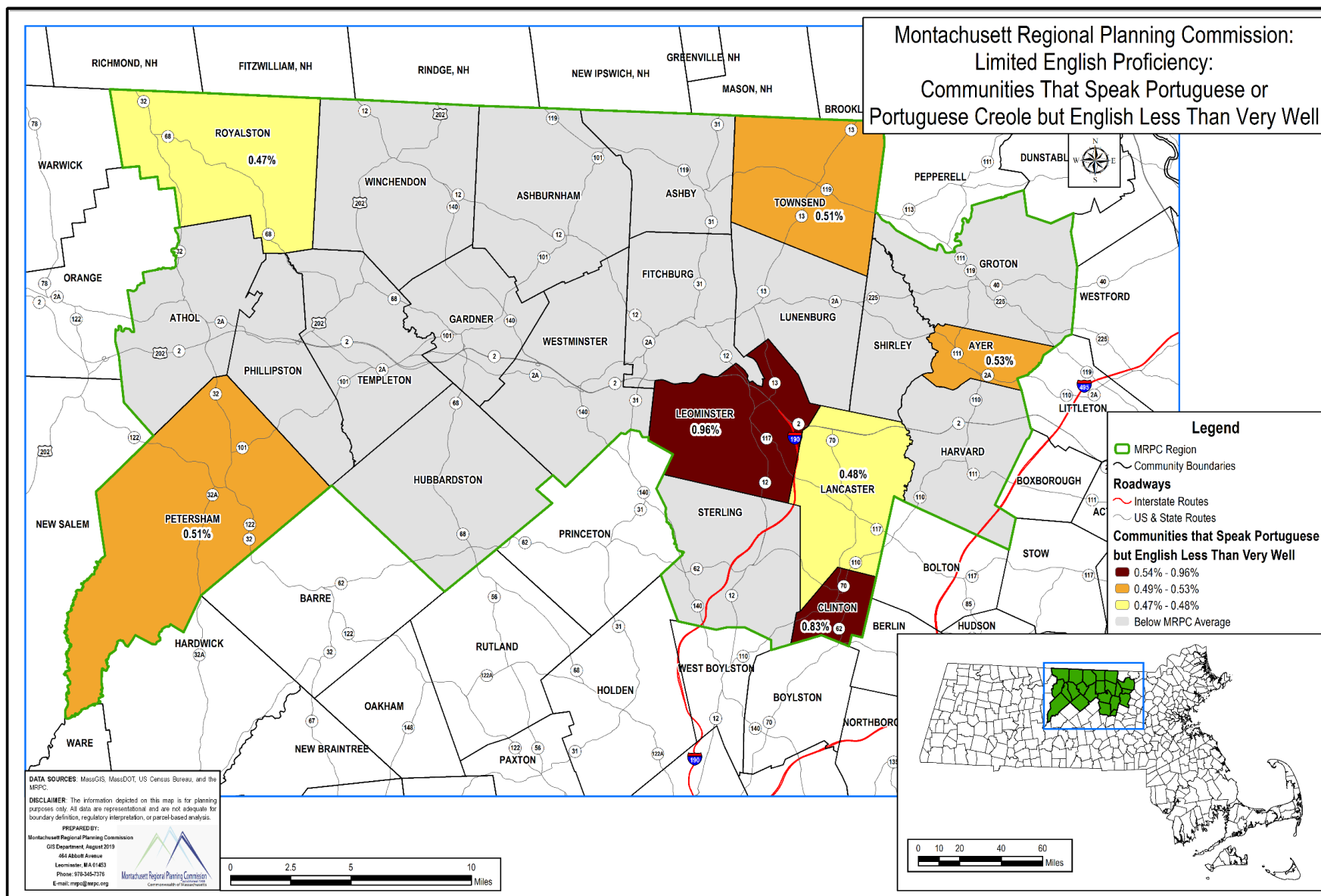
LEP PLAN ATTACHMENTS

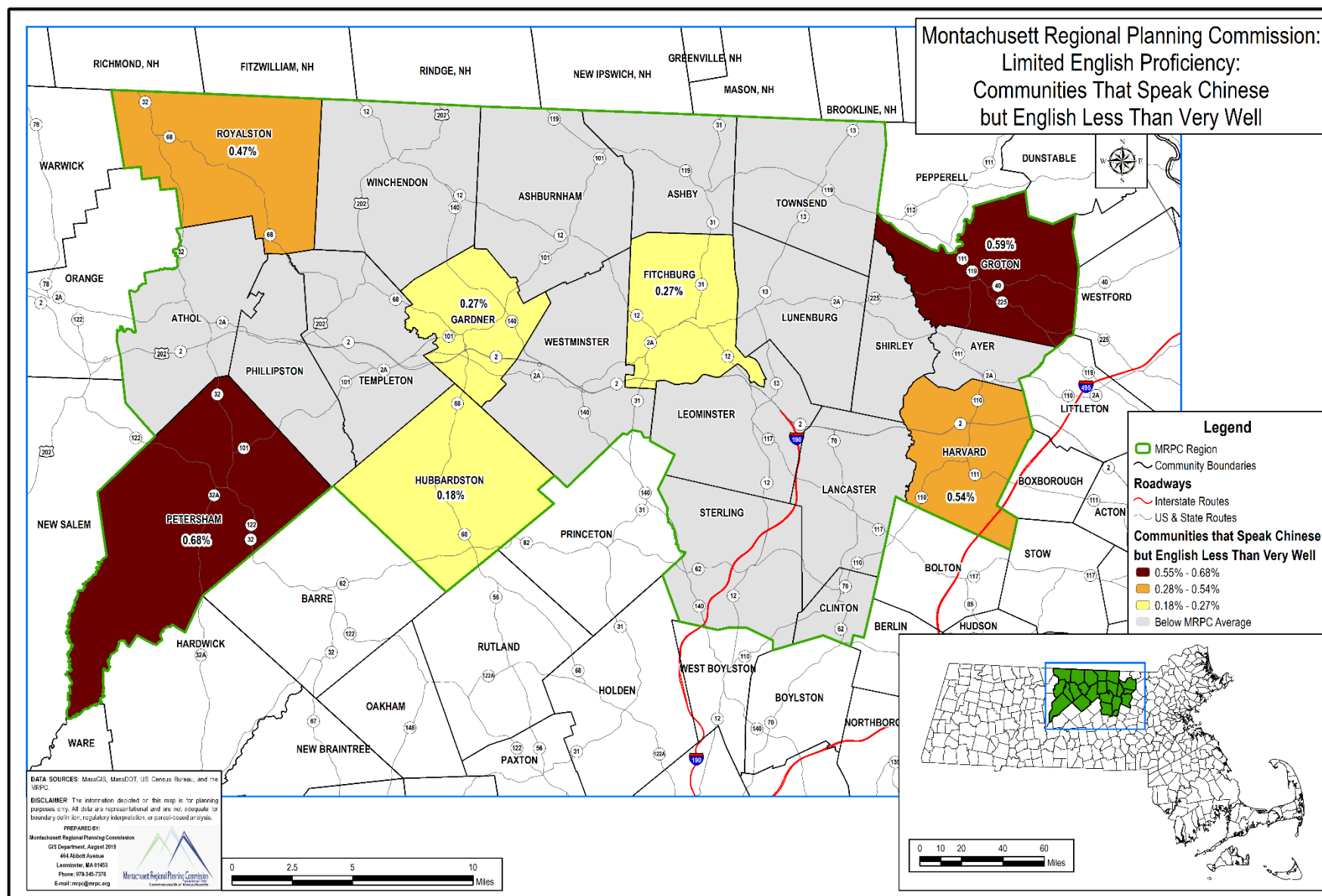
Attachment 1: Maps of LEP Census Tract Data

Attachment 2: LEP Self-Assessment Form

Attachment 1- Maps







Attachment 2- Self-Assessment Form

Agency Self-Assessment

1. Understanding How LEP Individuals Interact with Your Agency

The following series of questions helps agencies understand how an LEP individual may come into contact with your agency:

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with LEP individuals?
☐ Yes ☐ No
2. Please describe the manner in which your agency interacts with the public or LEP individuals:
☐ In-Person ☐ Via Correspondence ☐ Electronically (e.g. email/website)
☐ Telephonically ☐ Other: (please specify)
3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.)
☐ No ☐ Yes
4. If your agency does provide federal financial assistance to non-federal entities:
 - a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards? ☐ Yes ☐ No
 - b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services? ☐ Yes ☐ No
 - c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access? ☐ Yes ☐ No

2. Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your agency identify LEP individuals? (Select all that apply)
☐ Assume limited English proficiency if communication seems impaired
☐ Respond to individual requests for language assistance services
☐ Self-identification by the non-English speaker or LEP individual
☐ Ask open-ended questions to determine language proficiency on the telephone or in person
☐ Use of "I Speak" language identification cards or posters
☐ Based on written material submitted to the agency (e.g. complaints)
☐ We have not identified non-English speakers or LEP individuals
☐ Other (Please specify): _____
2. Does your program have a process to collect data on:

- a. The number of LEP individuals that you serve? ☐ Yes ☐ No
 - b. The number of LEP individuals in your service area? ☐ Yes ☐ No
 - c. The number and prevalence of languages spoken by LEP individuals in your service area?
☐ Yes ☐ No
3. How often does your agency assess the language data for your service area?
☐ Annually ☐ Biannually ☐ Not Sure ☐ Other: _____
 4. What data does your agency use to determine the LEP communities in your service area? (select all that apply)
☐ Census ☐ US Dept. of Education ☐ US Dept. of Labor ☐ State Agencies
☐ Community Organizations ☐ Intake information ☐ Other: _____
 5. Do you collect and record primary language data from individuals when they first contact your programs and activities? ☐ Yes ☐ No
 6. If you collect and record primary language data, where is the information stored? _____

 7. What is the total number of LEP individuals who use or receive services from your program each year?

 8. How many LEP individuals attempt to access your programs or services each month? _____
 9. How many LEP individuals use your programs or services each month? _____
 10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).

<u>Language</u>	<u>Frequency of Encounters</u>
1. _____	1. _____
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____
5. _____	5. _____
6. _____	6. _____

3. Providing Language Assistance Services

The following set of questions will help you assess how well your agency is providing language assistance services to LEP individuals:

1. Does your agency currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction? ☐ Yes ☐ No
2. What data, if any, do you maintain regarding language assistance services? (select all that apply)

- ☐ Primary language of persons encountered or served
- ☐ Use of language assistance services such as interpreters and translators
- ☐ Funds or staff time spent on language assistance services
- ☐ Number of bilingual staff
- ☐ Cost of interpreter services
- ☐ Cost of translation of materials into non-English languages
- ☐ Other (please specify): _____

3. Does your agency have a system to track the cost of language assistance services? ☐ Yes ☐ No

4. What types of language assistance services does your agency provide? (Select all that apply)

- ☐ Bilingual staff ☐ In-house interpreters (oral) ☐ In-house translators (documents)
- ☐ Contracted interpreters ☐ Contracted translators ☐ Volunteer interpreters or translators
- ☐ Telephone interpretation service ☐ Video interpretation service
- ☐ Interpreters or translators borrowed from another agency
- ☐ Language bank or dedicated pool of interpreters or translators ☐ Other: _____

5. Does your agency

- a. Have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals? ☐ Yes ☐ No
- b. Does the process include use of standardized language proficiency exams? ☐ Yes ☐ No

6. Does your agency ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret? ☐ Yes ☐ No

7. Does your agency have contracts with language assistance service providers (in person interpreters, telephone interpreters, video interpreters, or translators)? ☐ Yes ☐ No

8. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters? ☐ Yes ☐ No

9. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area? ☐ Yes ☐ No

10. Which vital written documents has your agency translated into non-English languages?

- ☐ Consent forms ☐ Complaint forms ☐ Intake forms
- ☐ Notices of rights ☐ Notice of denial, loss or decrease in benefits or services
- ☐ Applications to participate in programs or activities or to receive benefits or services
- ☐ Notice of disciplinary action ☐ Other (please specify): _____

11. Does your agency translate signs or posters announcing the availability of language assistance services?

☐ Yes ☐ No

12. When your agency updates information on its website, does it also add that content in non-English languages?

☐ Yes ☐ No

4. Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals? ☐ Yes ☐ No

2. Who receives staff training on working with LEP individuals? (Select all that apply)

☐ Management or senior staff ☐ Bilingual Staff ☐ New Employees
☐ Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals
☐ All Employees ☐ Volunteers ☐ Others (Please Specify) _____ ☐ None of the above

3. Are language access policies and LEP issues included in the mandatory training curriculum for staff?

☐ Yes ☐ No

4. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals? ☐ Yes ☐ No

5. Does staff receive periodic training on how to obtain and work with interpreters? ☐ Yes ☐ No

6. Does staff receive periodic training on how to request the translation of written documents into other languages?

☐ Yes ☐ No

7. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics? ☐ Yes ☐ No

8. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter? ☐ Yes ☐ No

5. Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)

☐ Frontline and outreach multilingual staff

☐ Posters in public areas

☐ Website

☐ "I Speak" language identification cards distributed to frontline staff

☐ Social Networking website (e.g. Facebook, Twitter)

☐ E-mail to individuals or a list serv

☐ Other (please specify): _____

☐ None of the Above
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services? ☐ Yes ☐ No
3. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)? ☐ Yes ☐ No
4. Does your agency inform community groups about the availability of free language assistance services for LEP individuals? ☐ Yes ☐ No
5. Does your agency inform current applicants or recipients about the availability of language assistance services? ☐ Yes ☐ No
6. Does the main page of your agency website include non-English information that would be easily accessible to LEP individuals? ☐ Yes ☐ No
7. Does your agency have multilingual signs of posters in its offices announcing the availability of language assistance services? ☐ Yes ☐ No

6. Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you access whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your agency have a written language access policy? ☐ Yes ☐ No
2. If so, is a description of this policy available to the public? ☐ Yes ☐ No
3. How often is your agency's language access policy reviewed and updated?

☐ Annually

☐ Biannually

☐ Not Sure

☐ Other: _____
4. When was the last time your agency's language access policy was updated?

Month _____ Year _____

5. How often does your agency update its data on the LEP communities in your service area?

☐ Annually ☐ Biannually ☐ Not Sure ☐ Other: _____

6. Does your agency have a language access coordinator?

☐ Yes ☐ No

7. Does your agency have a formal language access complaint process?

☐ Yes ☐ No

8. Has your agency received any complaints because it did not provide language assistance services?

☐ Yes ☐ No

9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?

☐ Yes ☐ No

10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide? ☐ Yes ☐ No

COMMENTS AND RESPONSES

Action	
Comment 1.	1. From Barbara Yocum, MRPC Representative from Shirley – There should be a note or indication that the figures for Shirley are likely affected by MCI Shirley.
Response 1.	1. It is mentioned on page 3 in the write up and we will also add a note under the Table 1.
Comment 2.	<ol style="list-style-type: none"> 1. From the Townsend Planning Board – The data points presented for the Town of Townsend in Table 2 – Language Breakdown of Those Who Speak English Less Than Very Well (ELTVW) specifically the Hmong and Portuguese speaking populations, and consequently the ELTVW total, appear to be misrepresentative of the actual populations currently residing in Townsend. 2. Further research confirmed a high margin of error occurred in the results presented in Table 2 for Townsend. 3. Further research conducted through the Town Clerk could not confirm the data presented in Table 2 of the Draft LEP to be representative of the present population of Townsend. 4. The data in Table 2 and consequently the Maps generated utilizing this data on Page 13 and Page 15 of the Draft are questionable and presumed misrepresentative of the actual populations currently residing in Townsend.
Response 2.	1. MRPC used the 2010-2015 American Community Survey (ACS) for this document because it is the most up to date information available that has a language breakdown. The ACS, like any statistical activity, is subject to error. The ACS is sponsored by the U.S. Census Bureau, and is part of the Decennial Census Program. The purpose of this documentation is to provide a basic understanding of what the top languages are for the Montachusett Region. The MRPC understands that this may not be what is truly represented within the member communities. Additionally, it should be noted that the LEP is developed to assist the MPO in its outreach efforts and is not intended to act as guidance for local communities.