

# LIMITED ENGLISH PROFICIENCY (LEP) ACCESS PLAN

UPDATE DECEMBER 2022

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**MPO ENDORSED – February 15, 2023**

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

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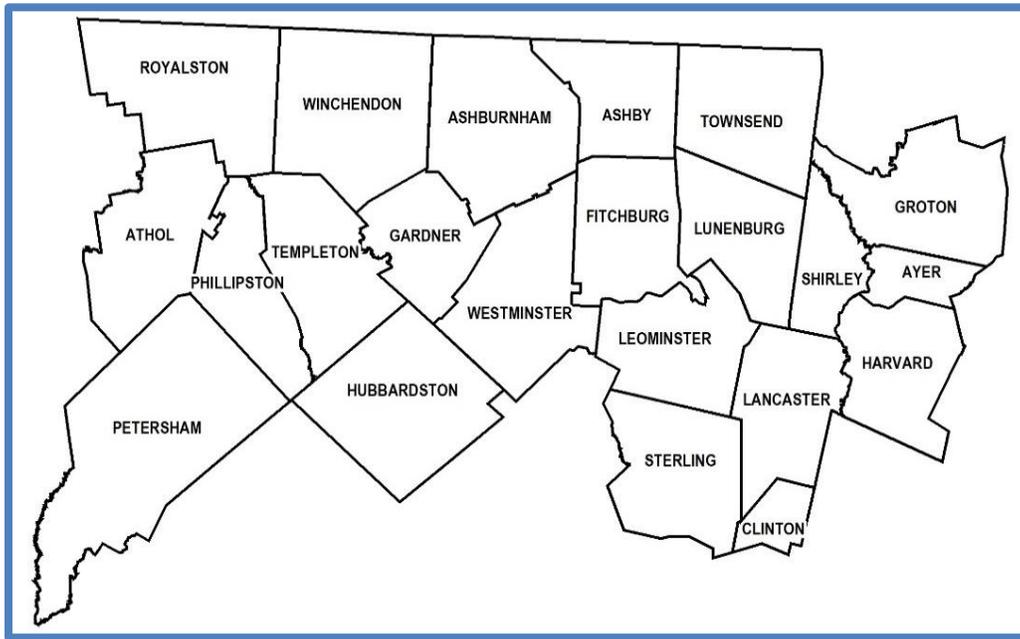
### Version History

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
3.0	2/15/2023	Update – MPO Adopted	S. Bean/B. Harris



## I. Introduction

The Montachusett Regional Planning Commission (MRPC) is in the middle of 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 236,131 individuals according to the latest 2021 American Community Survey (ACS) 5 Year Estimates.



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 the Massachusetts Department of Transportation (MassDOT), the Highway Administrator of MassDOT, the Chair of the MRPC and the Chair of 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 recent and detailed language breakdown data available, the 2021 American Community Survey (ACS) – 5-Year Estimates Detailed Tables - Table ID: C16001, 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 2021 ACS – 5-Year Estimates, 8.23% (or 25.5 million people) of the United States population age 5 and older (or 310.3 million people) speak English less than very well (ELTVW). Of those individuals, 62.97% speak Spanish, 2.30% speak French, Haitian or Cajun, 7.10% speak Chinese (including Mandarin, & Cantonese), 3.46% speak Vietnamese, and 24.17% speak some other language all together.

	Total Population Age 5+	Speaks English Less Than Very Well (ELTVW)	Spanish ELTVW	French, Haitian, or Cajun ELTVW	Chinese (incl. Mandarin, Cantonese) ELTVW	Vietnamese ELTVW	All Other Languages ELTVW
Total Population United States	310,302,360	25,535,259 8.23%	16,079,944 62.97%	587,517 2.30%	1,812,411 7.10%	884,529 3.46%	6,170,858 24.17%

2021 American Community Survey – 5 Year Estimates Table ID: C16001

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 2021 American Community Survey – 5 Year Estimates and was able to determine that approximately 5.02% (or 11,848 individuals) of the MRPC population age five and

older (236,131 individuals) speak English less than very well (ELTVW). This is therefore considered the Limited English Proficiency (LEP) population for the region. The majority of these individuals reside in Clinton, Fitchburg, Harvard, and Leominster. Each of these communities has a LEP population percentage that exceeds the Montachusett regional average of 5.02%.

The inclusion of the town of Harvard can be explained by looking at the census tract and block group data. Contained within block group 7614.02, located in the northwest section of the town bordering Route 2 and Shirley, is the Devens Federal Medical Center (FMC) and Devens Prison Camp. If this block group is considered separately, the ELTVW population is approximately 8.33% of the total block group population. The remaining Harvard block group has a ELTVW percentage of only 4.72%. This helps explain why Harvard, as a whole community, exceeds the regional ELTVW average of 5.02%.

It should be noted that the 2021 ACS Estimates have a different category breakdown than prior ACS estimates, specifically, the 2015 ACS Estimates utilized in the previous version of this LEP. In prior MRPC LEP analyses, the 2015 ACS most common language categories were identified as Spanish or Spanish Creole; French; Portuguese; Chinese; and Hmong. Language categories in the 2021 ACS include Spanish; French (including Haitian, or Cajun); Chinese (including Mandarin, & Cantonese); Vietnamese; German (or other West Germanic languages); Russian Polish or other Slavic languages; Other Indo-European languages; Korean; Tagalog (including Filipino); Other Asian and Pacific Island languages; and Arabic. A one-to-one comparison from prior LEP analysis was therefore not conducted. Those language categories not specifically identified in the following tables are grouped into the category “All Other Languages Combined”.

**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	5,958	32	0.54%
Ashby	3,140	0	0.00%
Athol	11,324	191	1.69%
Ayer	7,885	248	3.15%
<b>Clinton</b>	<b>14,301</b>	<b>1,272</b>	<b>8.89%</b>
<b>Fitchburg</b>	<b>39,394</b>	<b>3,481</b>	<b>8.84%</b>
Gardner	20,064	624	3.11%
Groton	10,746	127	1.18%
<b>Harvard*</b>	<b>6,367</b>	<b>392</b>	<b>6.16%</b>
Hubbardston	4,044	30	0.74%
Lancaster	8,073	279	3.46%
<b>Leominster</b>	<b>40,844</b>	<b>3,868</b>	<b>9.47%</b>
Lunenburg	11,044	352	3.19%
Petersham	1,118	22	1.97%
Phillipston	1,891	4	0.21%
Royalston	1,374	0	0.00%
Shirley	7,134	270	3.78%
Sterling	7,653	95	1.24%
Templeton	7,578	212	2.80%
Townsend	8,706	149	1.71%
Westminster	7,773	14	0.18%
Winchendon	9,720	186	1.91%
<b>MRPC Region Total</b>	<b>236,131</b>	<b>11,848</b>	<b>5.02%</b>
United States Total	310,302,360	25,535,259	8.23%

Source: 2021: ACS 5-Year Estimates Detailed Tables; Table ID: C16001  
 Those communities in BOLD type exceed the MRPC Regional ELTVW average of 5.02%

\* The block group data, when broken down for Harvard, shows that the data increases in the northwestern block group which houses the Devens Federal Medical Center and Devens Prison Camp. This block group has a ELTVW of over 8% whereas the remaining Harvard block groups average only 4.72%. This helps to explain why Harvard, a rural community, is included with the more urban communities for exceeding the regional ELTVW average.

Of that 5.02% regional LEP population, the largest groups are Spanish speakers (62.21% or 7,371 people). This is then followed by French, Haitian or Cajun (5.58% or 661 people); Vietnamese (3.33% or 395); and Chinese (including Mandarin, Cantonese) (2.52% or 299).

The category of Other Indo-European Languages, which includes languages such as Italian; Portuguese; Greek; Hindi; comprises 12.68% (or 1,502 individuals) for the region. Languages included under the heading “All Other Languages,” such as German or other West Germanic languages; Russian, Polish, or other Slavic languages; Korean; Tagalog (including Filipino); Other

Asian and Pacific Island languages; Arabic; and Unspecified Languages, account for 13.67% or 1,620 individuals. Although both of these categories, with their combined multiple languages, exceeds the overall regional average for ELTVW individuals of 5.02%, if the individual languages were to be considered, their individual percentages would be relatively small and less than the regional average. 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 ELTVW	French, Haitian, or Cajun ELTVW	Chinese (incl. Mandarin, Cantonese) ELTVW	Other Indo-European languages ELTVW	Vietnamese ELTVW	All Other Languages ELTVW
Ashburnham	5,958	32	0	0	0	16	0	16
Ashby	3,140	0	0	0	0	0	0	0
Athol	11,324	191	112	54	17	4	4	0
Ayer	7,885	248	16	21	69	129	11	2
Clinton	14,301	1,272	852	0	53	239	11	117
Fitchburg	39,394	3,481	2,695	243	35	159	67	282
Gardner	20,064	624	374	69	0	18	9	154
Groton	10,746	127	5	18	23	55	18	8
Harvard	6,367	392	292	3	46	18	0	33
Hubbardston	4,044	30	30	0	0	0	0	0
Lancaster	8,073	279	197	18	10	41	0	13
Leominster	40,844	3,868	2,450	95	0	552	56	715
Lunenburg	11,044	352	95	52	0	95	0	110
Petersham	1,118	22	5	4	0	4	9	0
Phillipston	1,891	4	4	0	0	0	0	0
Royalston	1,374	0	0	0	0	0	0	0
Shirley	7,134	270	124	58	0	29	0	59
Sterling	7,653	95	0	0	18	77	0	0
Templeton	7,578	212	0	11	0	0	174	27
Townsend	8,706	149	23	0	16	54	36	20
Westminster	7,773	14	14	0	0	0	0	0
Winchendon	9,720	186	83	15	12	12	0	64
<b>TOTALS</b>	<b>236,131</b>	<b>11,848</b>	<b>7,371</b>	<b>661</b>	<b>299</b>	<b>1,502</b>	<b>395</b>	<b>1,620</b>
<b>Percentage</b>	-	<b>5.02%</b>	<b>62.21%</b>	<b>5.58%</b>	<b>2.52%</b>	<b>12.68%</b>	<b>3.33%</b>	<b>13.67%</b>

Source: 2021: ACS 5-Year Estimates Detailed Tables; Table ID: C16001

**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 2019, 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 have been and will be utilized in an attempt to bring as many individuals as possible into the plan development. This includes updates at several meetings, targeted emails, online and hard copy surveys and web-based applications. Additionally, during the development of other planning documents, a notice of applicability and linkage to the RTP have been and will be 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 to work collaboratively towards addressing these needs. By working with CHNA9, we have been working to increase our public outreach by utilizing their contact lists and working with an array of organizations and individuals. This type of work has also extended into the planned update and development of the Coordinated Public Transit - Human Services Transportation Plan (CPTHST).

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 programing, 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 has and will be conducting a public survey for the planned update of the Regional Transportation Plan (RTP). This survey will be made available both online and through hard copies at community libraries and senior centers. The survey asks respondents questions related to priorities and services that are important to them and their community. These surveys were translated into Spanish, which is the top non-English language within the Montachusett Region. At this time, the survey is still open for responses, so no analysis has been conducted related to any LEP participation.

Additionally, with recent restrictions and limitations that have been and continue to be in place due to the COVID-19 pandemic, the MRPC has transitioned to online meetings for the MRPC, MJTC and MPO. Information is published for each meeting that identifies how an individual can participate. Other meetings and public workshops, i.e., those established for the RTP update, are also made available to the general public online. Meeting notices are routinely distributed to communities, individuals, groups and organizations that are part of our email outreach lists. These mailings also contain information on how to participate in the meetings online or in person. It is anticipated that at some future date, meetings will begin to be held in person, however, it is the intention of the MRPC to maintain an online option in order to maximize individual participation.

#### **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. Staff has the ability to coordinate translation efforts with MassDOT as well as other departments within the MRPC. Staff continues to monitor and explore language and translation options available to the MRPC. Since the last LEP, there have been no requests for translation services for meetings and/or reports, studies, etc.

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." The 2021 American Community Survey – 5 Year Estimates data shows that 15.75% of the regional population over 5+ years of age, speaks a language other than English. On the other side, approximately, 84.25% of the regional population speaks only English. Of that 15.75%, 11,848 individuals, or 5.02%, are identified as "Speaks English Less Than Very Well." As previously stated

in Table 2, of that 5.02% LEP population; the largest groups are the Spanish-speakers (62.21% or 7,371 people). This is a slight increase from the data used in the 2019 LEP where the 2015 ACS 5 - Year Estimates that were used, showed that those categorized as “Speaks English Less Than Very Well” was only 4.55% of the regional population.

For this LEP, the 2021 ACS estimates, indicates that those classified as speaks “Spanish and ELTVW” and speaks “French, Haitian or Cajun and ELTVW” exceed the overall regional average of 5.02%, 62.21% and 5.58%, respectively. As stated previously, the categories identified as speaks “Other Indo-European languages and ELTVW” and speaks “All Other Languages and ELTVW” do exceed the regional average but are not included in this analysis due to the multiple languages that comprise these categories. 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 online meetings, include on all meeting notices how to request translation services for individuals. Notices will clearly state how individuals in need of translation services, are to contact the MRPC directly with their request. The name, email address and phone number of the responsible MRPC individual to contact will be clearly stated and available.
3. For in person public meetings in which members of this community are specifically addressed, include a request for translator in the invitations sent to constituents.
4. Have “I Speak Cards” at all in person meetings, 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.
5. Post a notice of available language translation assistance at the MPO reception areas with information on how to submit a request and to whom.
6. 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 written communications and some MPO document translation requests from LEP persons.

MRPC will seek to establish a program 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. This will be a regular agenda item for MRPC, MJTC and MPO meetings and will occur biannually or more frequently if needed.

The Title VI Compliant Form has been translated into Spanish, and French 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 if available.
- Documentation of language assistance requests.
- How to handle a complaint.
- 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.
- How to include translation request notices in meeting, workshop, and conference notices.
- How to address online meeting translation services requests.

### **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](http://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

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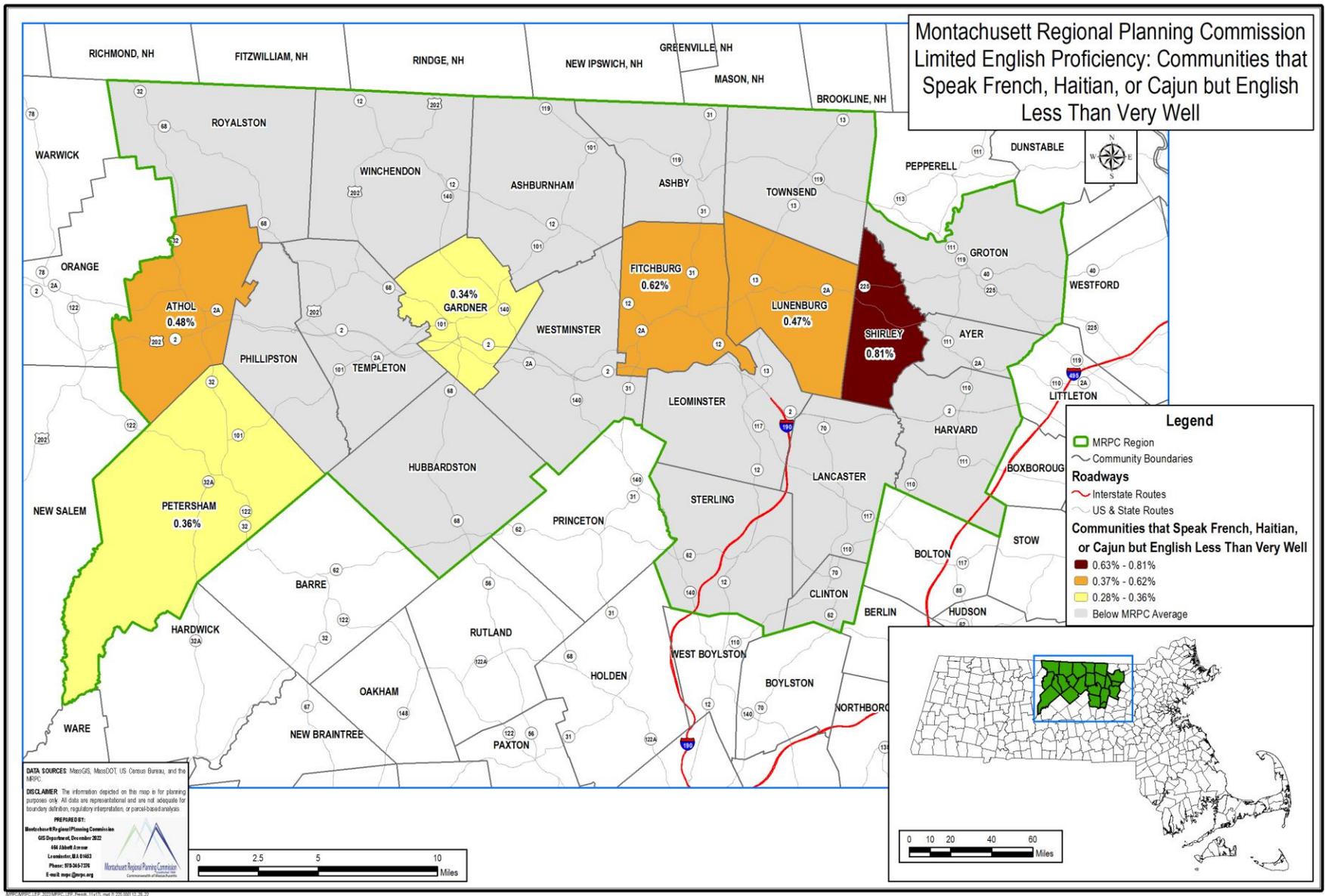
Attachment 1: Maps of LEP Census Tract Data

Attachment 2: LEP Self-Assessment Form

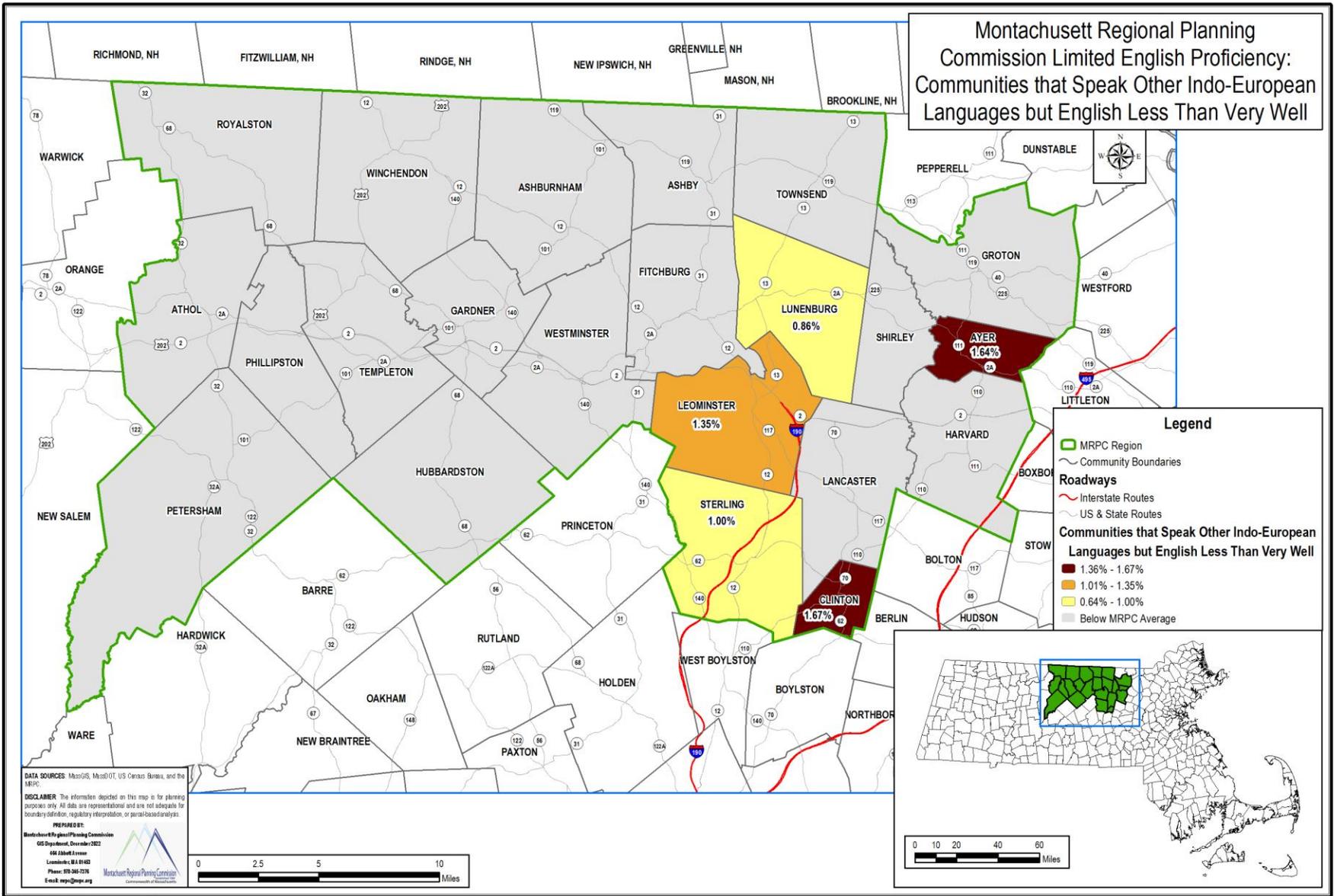
# Attachment 1- Maps

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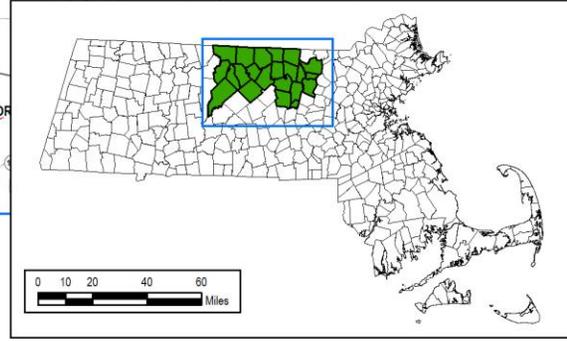
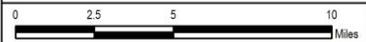
Montachusett Regional Planning Commission Limited English Proficiency: Communities that Speak Other Indo-European Languages but English Less Than Very Well

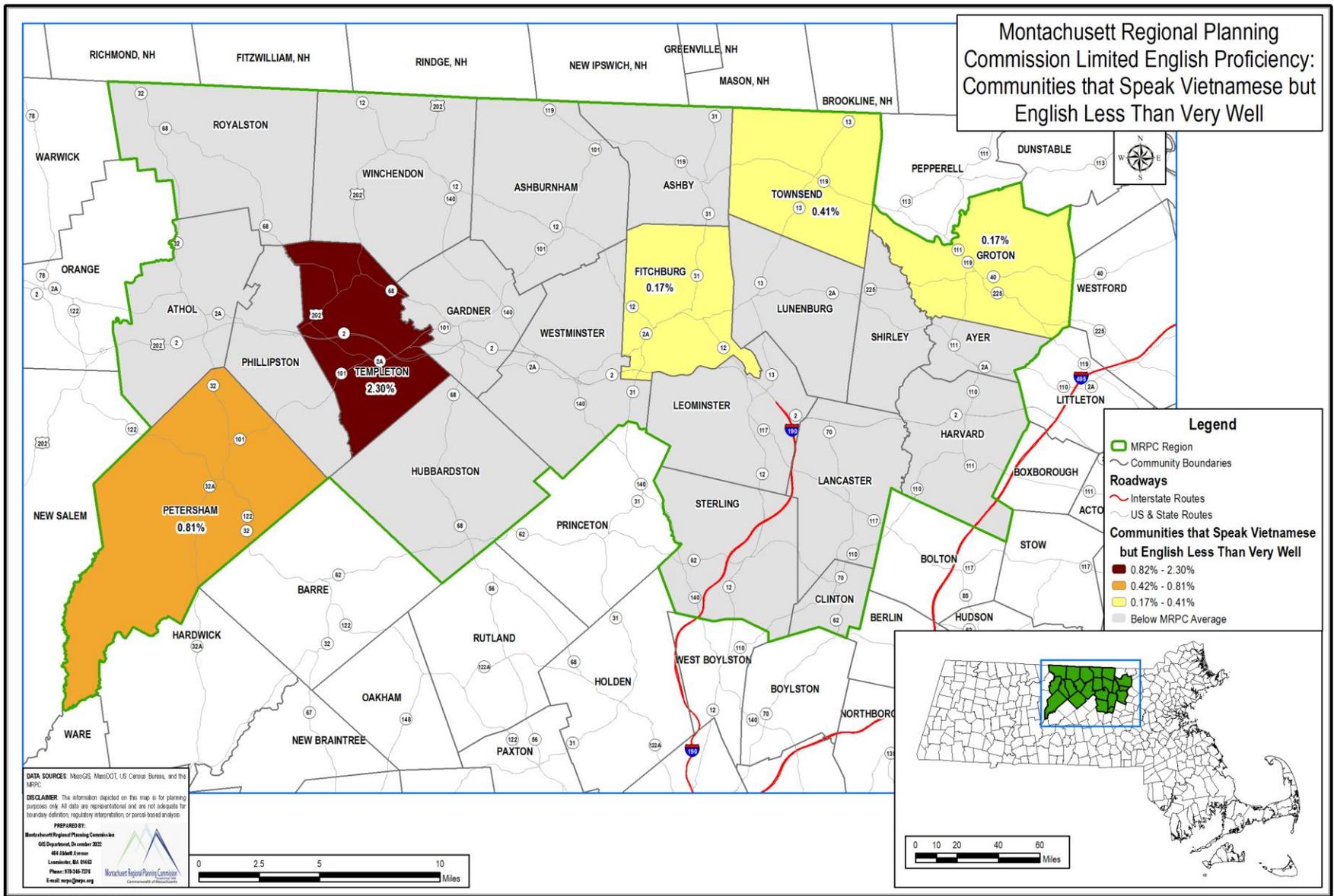


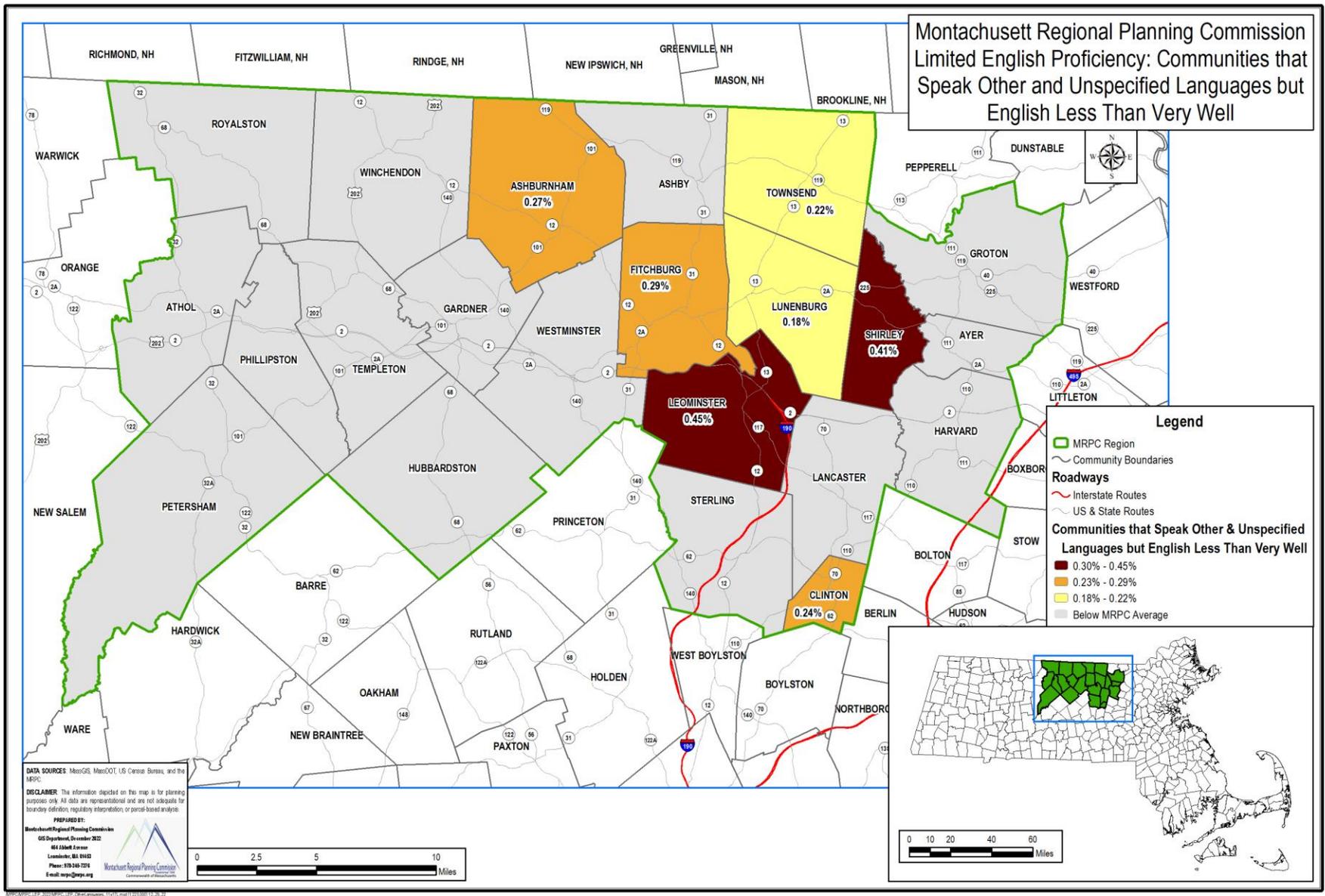
DATA SOURCES: MapInfo, Microsoft, US Census Bureau, and the MRPC.

DISCLAIMER: The information depicted on this map is for planning purposes only. All data are representational and are not suitable for boundary definition, regulatory interpretation, or parasitic analysis.

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 Leominster, MA 01453  
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# Attachment 2- Self-Assessment Form

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# Agency Self-Assessment

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## 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.)  
 Yes       No
  
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 assistances 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 or 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 assess 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

Comment	Response
2/8/2023 MJTC Meeting – A Member asked about how the anyone in the LEP population would be notified on any report, study or action.	MRPC staff indicated the various outreach mailings that have been or can be translated depending on any requests, the extensive outreach mailing list and the ability to translate the website through Google Translate. Also, posters of individual rights and protections are also in place in MRPC meeting areas, as well as online, in the top LEP languages as identified by the LEP analysis.
2/8/2023 MJTC Meeting – A Member indicated that we might want to look at the Census data for Devens, which encompasses the federal medical facilities, since it is classified as a Census Designated Place. This may be of assistance when looking at the community LEP figures for those communities that are part of Devens.	MRPC staff noted this recommendation and will examine Census data for future analysis.