



CMCOG-COATS MPO

LANGUAGE ASSISTANCE PLAN - DRAFT



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Background

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

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.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities, and sub-recipients.

Plan Summary

The Columbia Area Transportation Study (COATS) Metropolitan Planning Organization (MPO) has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking 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.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan 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.

Four Factor Analysis

The Four Factor Analysis is one of the primary compliance processes established in the Department of Justice's LEP Guidance. The Analysis provides a framework for agencies to use in identifying the LEP populations in their service area and developing a cost-effective and meaningful plan for providing appropriate language assistance services. The Four Factors are as follows:

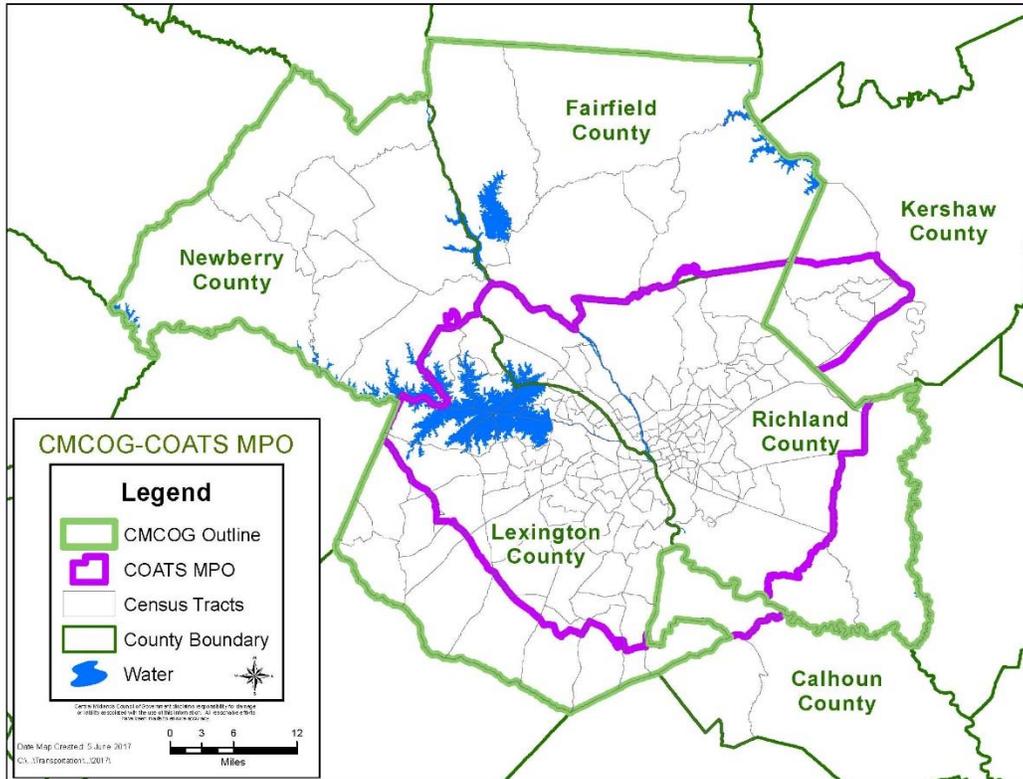
1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come into contact with the program, activity, or service provided.
3. The nature and importance of the program, activity, or service provided by the program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

A brief description of these considerations is provided in the following section.

Factor 1 – Number & Proportion of LEP Persons Encountered

Factor 1 evaluates the number of LEP persons served and the concentration of LEP persons in the service area population. In the case of the CMCOG-COATS MPO, the service area population is the total population within the region served by the MPO, including the following six (6) counties: Newberry, Fairfield, Lexington Richland, Calhoun, and Kershaw. (**Figure 1**).

Figure 1. CMCOG-COATS MPO Region



Language characteristics within the MPO region were identified using the U.S. Census Bureau’s 2011-2015 American Community Survey (ACS) data. The data for “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” was compiled and mapped at the tract level. Individuals are characterized as speaking English “very well” or “less than very well.” For this analysis, an individual who speaks English less than very well is considered an LEP person.

It is noted that the ACS data for the CMCOG-COATS MPO region includes the institutionalized populations of several penitentiaries. The CMCOG-COATS MPO does not provide services to these institutionalized persons. However, not all of the institutionalized populations could be identified specifically and screened from the analysis. Therefore, the data summaries and mapping provided in this document include the institutionalized populations.

Total LEP Population in the CMCOG-COATS MPO Region

Table 1 summarizes the total population and LEP population of All Language Groups in the CMCOG-COATS MPO region, with comparison to the state of South Carolina as a whole. Of the Region’s total population, about 21,000 persons or 3.0% of the total population are considered to have limited English proficiency.

Table 1. Total Population and LEP Population in the CMCOG-COATS MPO Region vs. South Carolina

	CMCOG-COATS MPO Region		South Carolina	
	Population Estimate	% of Total Population	Population Estimate	% of Total Population
Total Population	721,372		4,484,995	
Total LEP Population All Language Groups <i>Speak English less than "very well"</i>	21,346	3.0%	126,584	2.8%

Source: U.S. Census Bureau: American Community Survey (2011-2015), 5 Year Estimates.

Figure 2 illustrates the population of LEP persons in each Census tract. **Figure 3** illustrates the concentration (percentage of the total population) of LEP persons. The LEP populations are generally higher in Lexington, Richland, and Newberry Counties (see **Table 3**). The LEP concentrations follow a similar pattern, with these same three counties as well. It should also be noted that all of the counties in the CMCOG-COATS MPO study area have a minimum concentration of at least 1.0%

Figure 2. CMCOG-COATS MPO Population of Persons with Limited English Proficiency

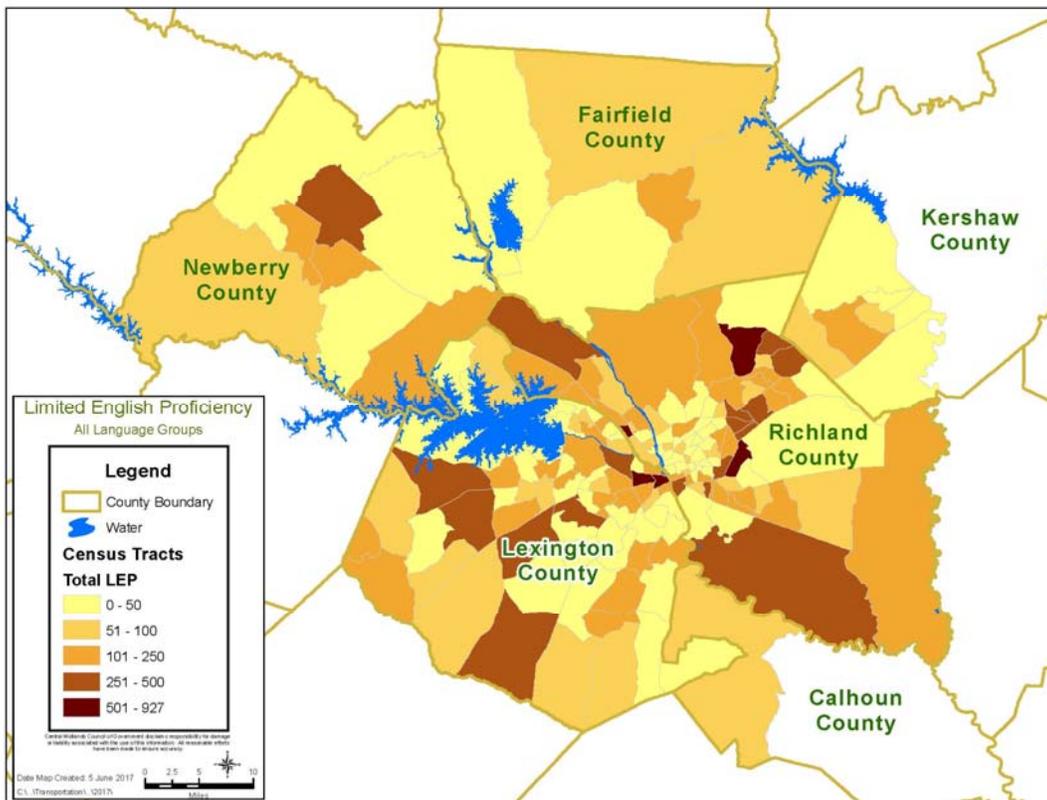


Figure 3. CMCOG-COATS MPO Concentration of Persons with Limited English Proficiency

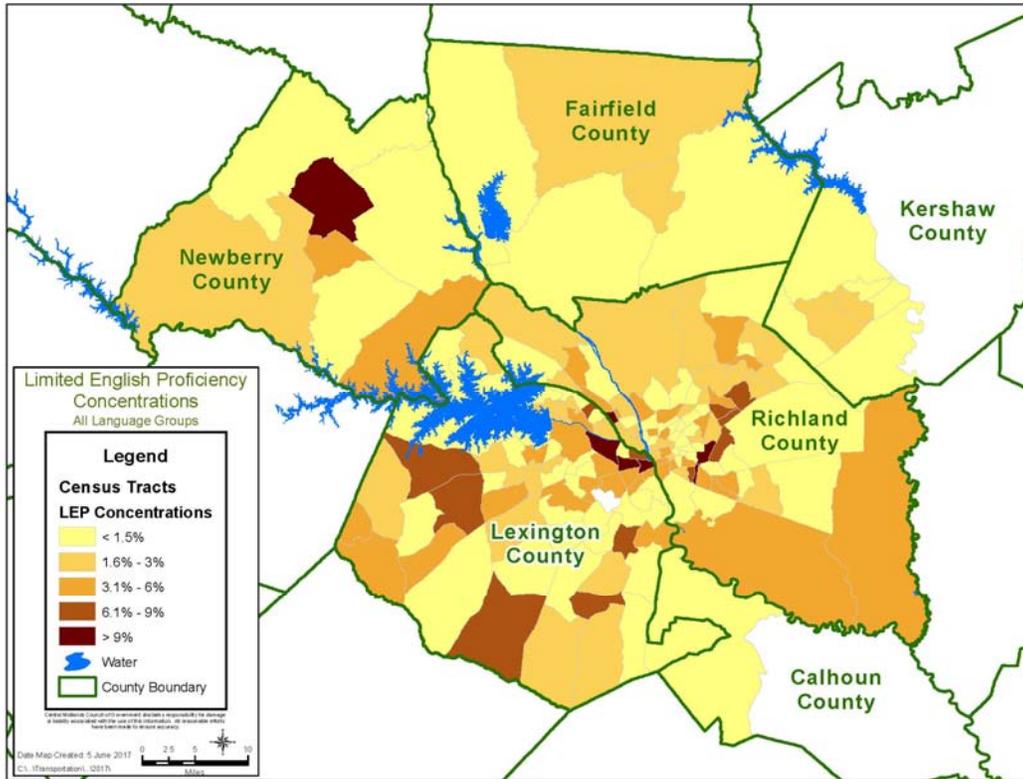


Table 3. LEP Persons for All Language Groups by County & MPO Census Tracts

CMCOG Counties & MPO Census Tracts	Total Population	All Language Groups LEP	
		Speak English less than "very well"	% of Total Population
Calhoun County MPO Census Tracts	5,305	59	1.1%
Fairfield County (CMCOG/MPO)	21,936	230	1.0%
Kershaw County MPO Census Tracts	27,904	361	1.3%
Lexington County (CMCOG/MPO)	256,816	8,102	3.2%
Newberry County (CMCOG/MPO)	35,399	1,064	3.0%
Richland County (CMCOG/MPO)	374,012	11,530	3.1%
Total	721,372	21,346	3.0%

Yellow Highlight indicates highest three counties for LEP population and Percentage of Total Population. **Source:** U.S. Census Bureau: American Community Survey (2011-2015), 5 Year Estimates.

Largest LEP Language Groups in the CMCOG-COATS MPO Region

Table 4 summarizes population data for the five (5) most populous LEP language groups in the CMCOG-COATS MPO Region. Comparisons to the statewide South Carolina data are provided for the same language groups. The Spanish, Chinese, and Korean language groups are by far the largest LEP populations. Beyond these “Top 5” populations, the Region is also home to LEP persons who speak a variety of other Asian languages.

Table 4. Top Five LEP Populations in the CMCOG-COATS MPO Region vs. South Carolina

	CMCOG-COATS MPO Region		South Carolina	
	Population Estimate	% of Total Population	Population Estimate	% of Total Population
Total Population	721,372		4,484,995	
LEP Language Groups -- Speak English less than "very well"				
Spanish	13,242	1.836%	89,487	2.00%
Chinese	1,228	0.170%	5,550	0.12%
Korean	1,228	0.170%	2,483	0.06%
Vietnamese	724	0.100%	3,946	0.09%
Other Asian Languages	545	0.076%	1,139	0.03%

Geographic Distribution of LEP Populations

Distributive mapping of the American Community Survey (ACS) data was prepared at the tract-level to develop a better understanding of the LEP populations in the CMCOG-COATS MPO region potentially qualifying for “Safe Harbor” treatment—namely the Spanish, Chinese, and Korean LEP populations.

Spanish Language Group

Figures 4 and 5 illustrate the distribution of Spanish LEP persons according to population and concentration, respectively. At the tract level, the higher populations and concentrations generally the following counties in descending order:

- Newberry
- Lexington
- Richland
- Calhoun
- Kershaw
- Fairfield

Figure 4. Spanish LEP Population by Census Tract

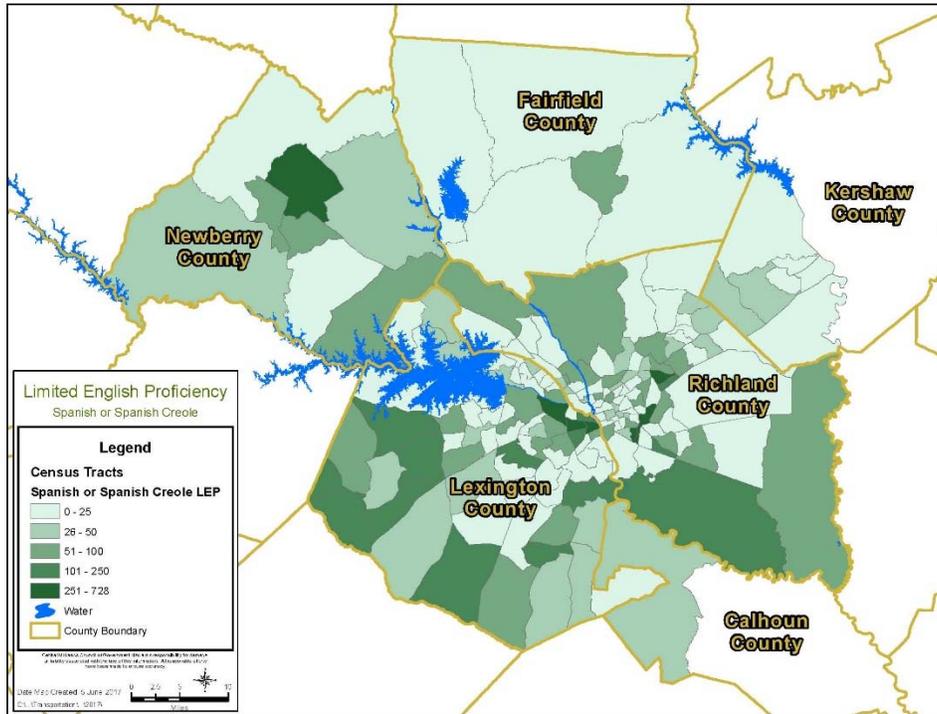


Figure 5. Spanish LEP Concentration by Census Tract

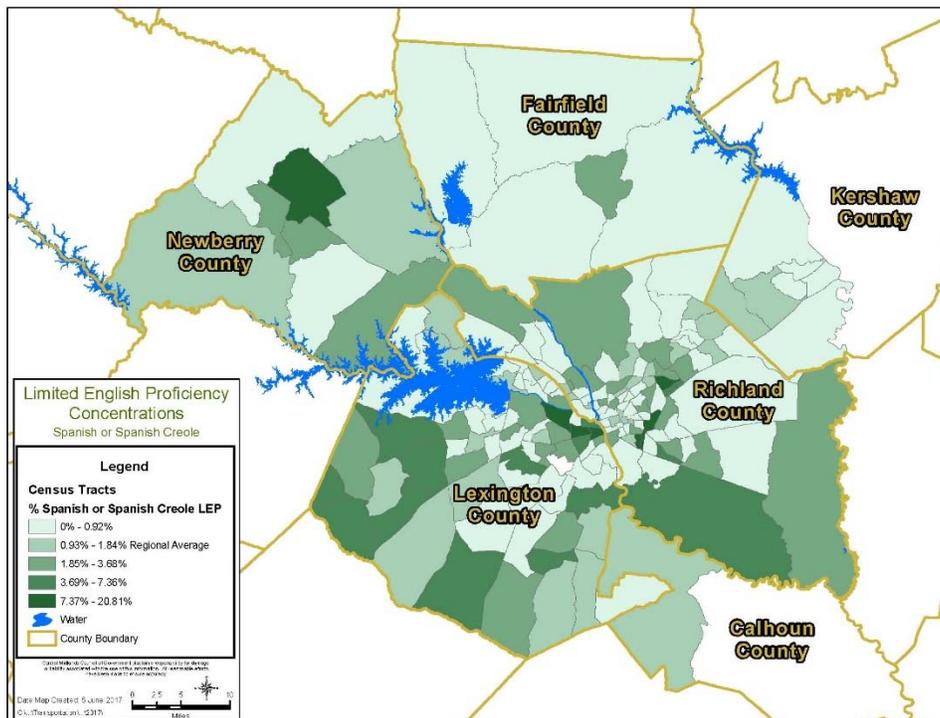


Table 5 summarizes the Spanish LEP populations by County & MPO Census Tract. The CMCOG-COATS MPO region, when taken as a whole, is home to about 15% of South Carolina’s total Spanish LEP population. Nearly all of the LEP population resides in Lexington and Richland Counties. The next largest populations exist in Newberry County. Concentrations are highest in Newberry County (2.9%), Lexington County (2.4%), Richland County (1.5%), followed by Calhoun County (1.1%). All other counties have concentrations less than 1.0%.

Table 5. Spanish Language Group LEP Persons by County & MPO Census Tracts

CMCOG Counties & MPO Census Tracts	Total Population	Spanish Languages LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Calhoun County MPO Census Tracts	5,305	59	1.1%
Fairfield County (CMCOG/MPO)	21,936	165	0.8%
Kershaw County MPO Census Tracts	27,904	218	0.8%
Lexington County (CMCOG/MPO)	256,816	6,176	2.4%
Newberry County (CMCOG/MPO)	35,399	1,016	2.9%
Richland County (CMCOG/MPO)	374,012	5,608	1.5%
Total	721,372	13,242	1.8%

Source: U.S. Census Bureau: American Community Survey (2011-2015), 5 Year Estimates.

Chinese Language Group

Figures 6 and 7 illustrate the distribution of Chinese LEP persons according to population and concentration, respectively. At the tract level, the populations of Chinese LEP persons are generally distributed throughout the MPO region, with higher populations in the following counties:

- Lexington County
- Richland County

Figure 6. Chinese LEP Population by Census Tract

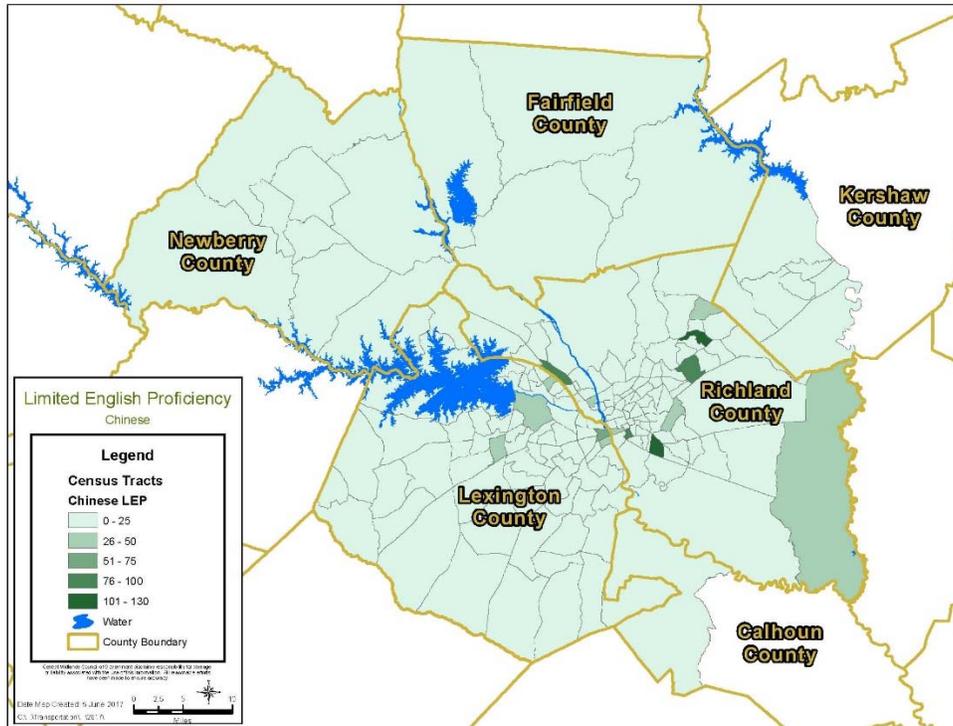


Figure 7. Chinese LEP Population by Census Tract

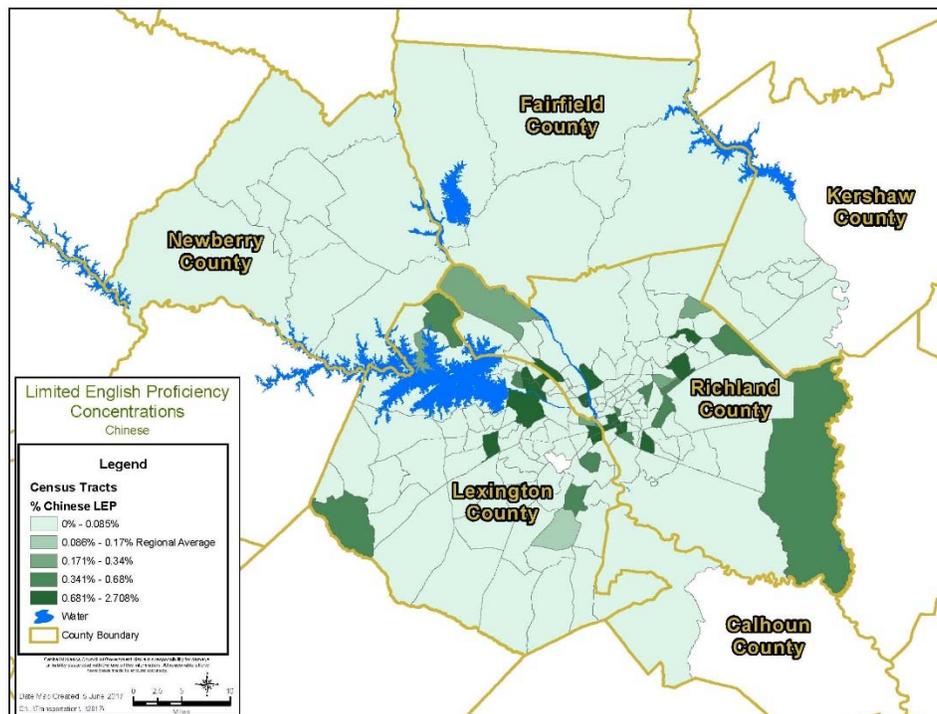


Table 6 summarizes the Chinese LEP populations by County & MPO Census Tracts. The CMCOG-COATS MPO region, when taken as a whole, is home to about 22% of South Carolina’s total Chinese LEP population. All of the LEP population resides in Lexington and Richland Counties. All other counties have concentrations of 0.00%.

Table 6. Chinese Language Group LEP Persons by County & MPO Census Tracts

CMCOG Counties & MPO Census Tracts	Total Population	Chinese Languages LEP	
		<i>Speak English less than "very well"</i>	% of Total Population
Calhoun County MPO Census Tracts	5,305	0	0.00%
Fairfield County (CMCOG/MPO)	21,936	0	0.00%
Kershaw County MPO Census Tracts	27,904	0	0.00%
Lexington County (CMCOG/MPO)	256,816	335	0.13%
Newberry County (CMCOG/MPO)	35,399	0	0.00%
Richland County (CMCOG/MPO)	374,012	893	0.24%
Total	721,372	1,228	0.17%

Source: U.S. Census Bureau: American Community Survey (2011-2015), 5 Year Estimates.

Korean Language Group

Figures 8 and 9 illustrate the distribution of Korean LEP persons according to population and concentration, respectively. At the tract level, the higher concentrations generally the following counties in descending order:

- Richland
- Kershaw
- Newberry
- Lexington
- Fairfield
- Calhoun

Figure 8. Korean LEP Population by Census Tract

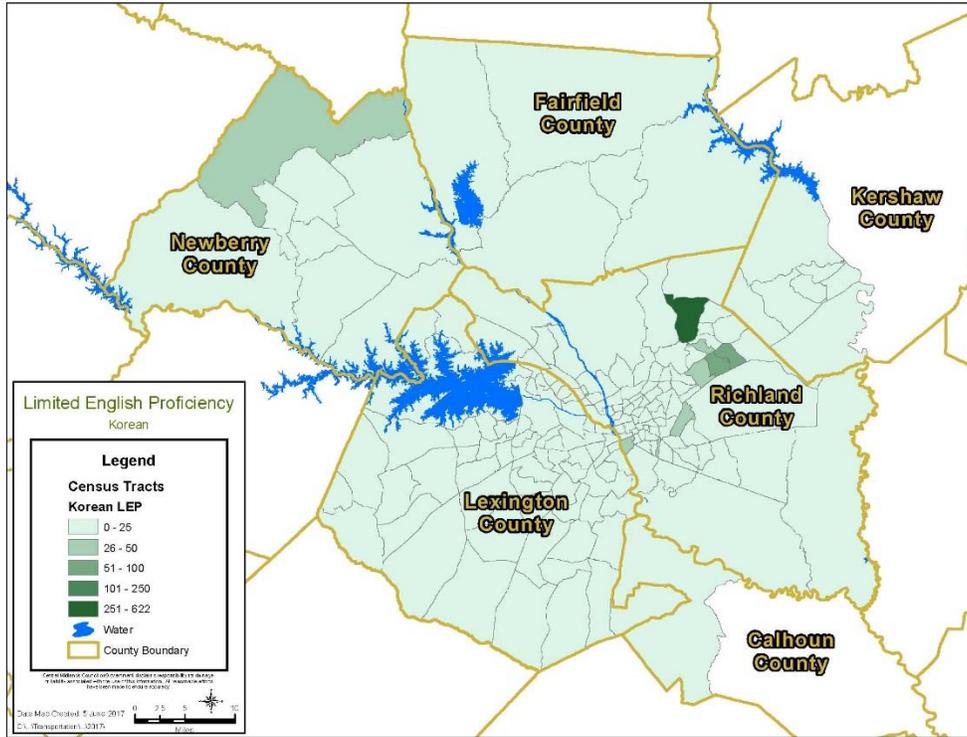


Figure 9. Korean LEP Population by Census Tract

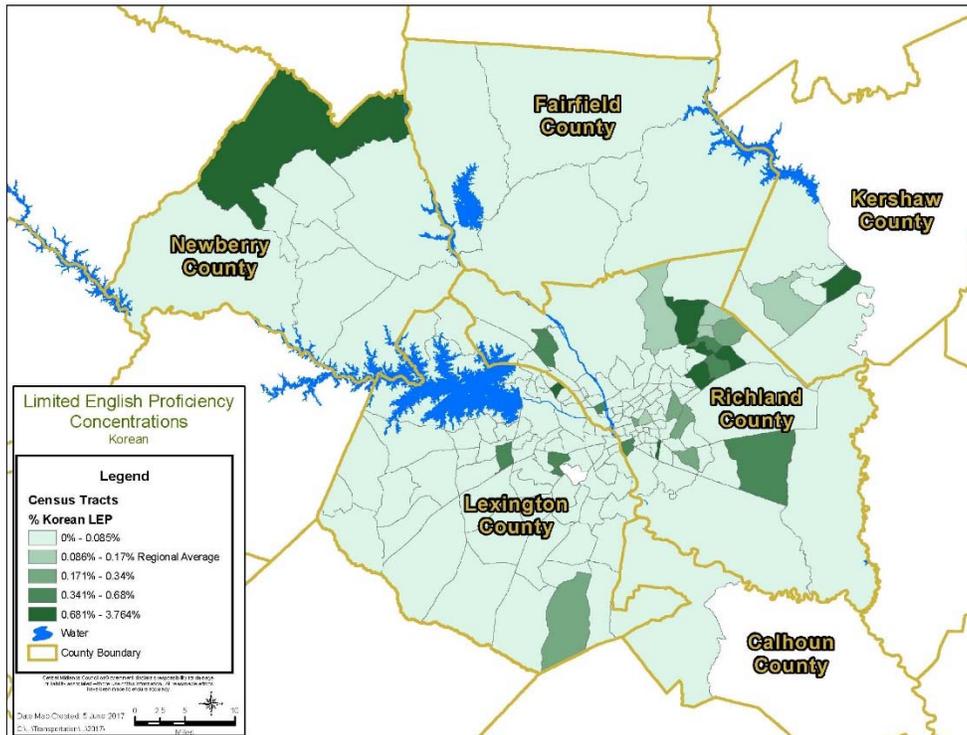


Table 7 summarizes the Korean LEP populations by County. The CMCOG-COATS MPO region, when taken as a whole, is home to about 49% of South Carolina’s total Korean LEP population. Nearly all of the LEP population resides in Richland County. The next largest populations exist in Lexington County. Please note that Richland County is the only county with a concentrations above the regional average.

Table 7. Korean Language Group LEP Persons by County & MPO Census Tracts

CMCOG Counties & MPO Census Tracts	Total Population	Korean Languages LEP	
		Speak English less than "very well"	% of Total Population
Calhoun County MPO Census Tracts	5,305	0	0.00%
Fairfield County (CMCOG/MPO)	21,936	0	0.00%
Kershaw County MPO Census Tracts	27,904	32	0.11%
Lexington County (CMCOG/MPO)	256,816	66	0.03%
Newberry County (CMCOG/MPO)	35,399	29	0.08%
Richland County (CMCOG/MPO)	374,012	1,101	0.29%
Total	721,372	1,228	0.17%

Source: U.S. Census Bureau: American Community Survey (2011-2015), 5 Year Estimates.

Safe Harbor Provision

The Safe Harbor Provision, as defined in the Department of Justice’s LEP Guidance, is the most prevalent guideline used to establish when language assistance services are considered appropriate and define expectations for what those services would entail.

Safe Harbor Triggers

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

Considering the CMCOG-COATS MPO region as a whole (i.e., the “service area”), the total LEP populations for Spanish, Chinese, and Korean language groups exceed the 1,000 person threshold, even though the regional concentrations of all three populations fall well below the 5% threshold (see **Table 4**). However, when the total LEP populations are viewed in light of eligibility or the likelihood of being affected or encountered, there is every indication that the modified Chinese and Korean LEP population would not trigger the Safe Harbor Provision. As a whole, the Chinese and Korean populations deliberately avoid encounters with those outside their culture—particularly governmental agencies—preferring to allow their church or community leaders to represent them and speak on their behalf. These leaders are typically fluent in both English and their native language.

Therefore, it is the conclusion of this analysis that the Safe Harbor Provision is triggered¹ in the CMCOG-COATS MPO region for the Spanish language group alone. The guidelines and requirements of the Safe Harbor Provision will not be applied to the any other language group. However, this LEP Plan will maintain documentation of the other LEP populations as a baseline for future analyses.

Safe Harbor Translation Expectations

The Provision states that providing written translation of “vital documents” for each LEP population that exceeds the Safe Harbor thresholds “shall be considered strong evidence of compliance with the recipient’s [CMCOG-COATS MPO] written translation obligations” (FTA C 4702.1B, Chapter III-9).

Based on the standard of practice, “vital documents” typically include those that explain how to access an organization’s services (including language assistance services), letters that require a response from a customer, complaint forms, and notification of rights. For the purposes of this LEP Plan, CMCOG-COATS MPO has designated the following as “vital documents” for translation:

- Notice of Language Services (**Appendix B**);
- Title VI Notice to Beneficiaries (**Appendix C**);
- Title VI Complaint Form (**Appendix D**); and
- Title VI Complaint Form Procedures (**Appendix E**).

While not considered “vital documents” translations of the Executive Summaries of the MPO’s primary plans and documents (e.g., Long Range Transportation Plan, Public Participation Plan, and Transportation Improvement Program) will be provided on an as-requested basis. Finally, when a Targeted Outreach Activity is triggered by the presence of an LEP population, written materials will be made available in the LEP language according to the Safe Harbor Provision.

Factor 2 – Frequency of Contact with LEP Persons

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

As a general rule, the LEP persons deliberately shy away from interaction with government agencies. These communities commonly look to a church leader to buffer inquiries, and these leaders are typically fluent in speaking the English language.

¹ This evaluation concludes that the Safe Harbor Provision is triggered for the Spanish language group, even though the analysis has not attempted to discern the total LEP population from those “eligible to be served or likely to be affected or encountered.”

Still, the following contact with LEP individuals has been noted as a need for more frequency and engagement. In review of one of the ways to enhance our contact with LEP communities is through our association with the networking group Alianza Latina. This working group is a Spanish speaking group of citizens and community leader that plan and program activities with LEP communities and can serve as an outreach tool that will enhance our frequency of contact with LEP persons.

By associating with group such as Alianza Latina, CMCOG-COATS MPO will be able to accurately identify and engage LEP persons early in project planning, programming, and development process of transportation projects and plans. With this LEP Plan, the CMCOG-COATS MPO is formally appropriating tools and training its staff for recognizing LEP persons, identifying their language, and serving LEP persons, when the need arises. The MPO has developed an Employee Training Manual to facilitate staff training and create a central source of information related to LEP. The manual includes information about Title VI and LEP requirements; LEP in the CMCOG-COATS area; resources for phone, in-person, and written translation; and LEP program evaluation techniques.

Factor 3 – Nature & Importance of the Program

The CMCOG-COATS MPO is, primarily, a planning organization for transportation investments in the region. As such, the MPO does not provide direct assistance to individuals and, as such, is not a vital service that impacts the day-to-day life of residents in the region. However, the MPO’s activities are important in the ongoing development of a safe and efficient transportation system that provides a desirable quality of life and economic opportunity in the region.

In particular, roadway safety planning is one of the most important CMCOG-COATS MPO functions. The CMCOG-COATS MPO recognizes the importance of involving LEP speaking communities when plans address locations and routes frequented by members of their community.

The CMCOG-COATS MPO staff has noted the “lessons learned” about the awareness of LEP populations near a project and the need for conducting thoughtful outreach. LEP persons commonly rely on public and non-motorized modes, as well as roadside and off-road pedestrian and bike facilities for day-to-day transportation. So while the planning activities of the MPO may not have urgent or direct impacts, they are nonetheless important to the long-term livelihood of all those who reside in the region.

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

Factor 4 – Resources & Costs of Language Assistance Services

The CMCOG-COATS MPO is a small agency with small capital resources available to spend on LEP services. The organization does have two (2) MPO staff available to facilitate interaction with LEP persons and will use low-cost or free services and automated techniques to provide translation and interpretation, upon request. The phone-based, on-demand interpretation service is one such service.

The MPO pools resources with other elements of the larger CMCOG-COATS organization to develop and maintain the administrative/reception staff and other technical staff (GIS, IT, etc.) While one member of the current staff is bilingual, many can recognize the Spanish language, and they have been trained on the protocols for dealing with requests for translation and interpretation and the relevant Title VI and LEP obligations of the organization. The pooled resources of CMCOG-COATS also maintain the agency's webpage, office facility, and the associated office equipment and services.

Language Assistance Plan

Consistent with Title VI of the Civil Rights Act, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", and the USDOT implementing guidance, the CMCOG-COATS MPO is responsible to take steps that ensure meaningful access to the services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). This includes the development of a Language Assistance Plan (LAP), which establishes an implementation program for providing meaningful access to LEP persons, based on the results of the Four Factor Analysis. The Four Factor Analysis evaluated the demography of the MPO region along with the frequency of contact with LEP persons, the importance the MPO's services to LEP persons, and resources available for accommodating LEP persons.

The overarching goal of this plan is to deploy tools and services that will enable the MPO staff to communicate with a person who does not speak English. According to the Safe Harbor Provision, this plan addresses accommodations for LEP persons who read Spanish. Immediate assistance for Spanish interpretation and other languages may be provided if an available service can accommodate the language requested (e.g., telephone-based phone interpretation service, local interpreters, etc.).

Structure of the LAP

This Language Assistance Plan is organized around the five potential Contact Points where the MPO would interact with LEP persons during the course of its official planning activities:

Primary Contact Points:

- Public Meetings
- Office Walk-In
- Telephone Calls
- Webpage
- Written Correspondence

While each Contact Point presents certain unique language service challenges, a small set of language assistance tools is necessary to provide effective language support.

Language Assistance Tools

Notices and Advertisements

The CMCOG-COATS MPO utilizes various methods and conduits for providing notice and advertisement of the language assistance services. These services are as follows:

- Posting translated notices in local newspapers as part of legal ads and press releases;
- Posting notices on the CMCOG-COATS website, which may be translated using Google Translate or another automated translation service;
- Posting translated notices in the CMCOG-COATS offices;
- Distributing written and email notices to Interested Parties, in their requested language.

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

- Designing and distributing informational materials detailing CMCOG-COATS planning efforts, including flyers, posters, brochures, and bus advertisements
- Radio or Public Service Announcements in Spanish
- Providing real-time translation services at Public Meetings or events with the use of headsets
- Presenting information at community organizations frequented by LEP individuals.

The occasions for using these methods and conduits are described in subsequent sections, where they are put into the context of the various Contact Points.

Language Identification Card

The Language Identification Card is a tool that states, in a number of languages, “If you need an interpreter, please point to your language.” The LEP person points to their language on the card to indicate their language. Each language is also identified in English at the right side of the page, so that an English-speaking person can accurately request interpretation services and engage an interpreter quickly. A sample Language Identification Card is provided in **Appendix F**. This appendix also includes a Language Identification Survey from the U.S. Census Bureau, for use where the written survey version may be more efficient. The card and survey will be a part of the materials maintained in the reception area or at the welcome/sign-in station of a public meeting.

Telephone-Based Interpretation Service

The CMCOG-COATS MPO intends to maintain a contract with a telephone-based (a.k.a, “on-demand”) interpretation service. With the increasing potential for interaction with LEP persons, the CMCOG-COATS MPO is prepared to utilize this service. Training will be provided for the MPO staff persons who are anticipated to use it. According to the MPO’s minimal amount of interaction with LEP persons, this service should provide an adequate level of interpretation service for the MPO’s needs.

Instructions for accessing the telephone-based service along with “helpful hints” for working with an over-the-phone interpreter will be provided to CMCOG-COATS MPO staff.

The MPO staff person who is interacting with an LEP person calls the phone number and the operator will either assist in identifying the LEP person’s language, or if the language is known, the interpreter will be connected, and the conversation can proceed in conference call or three-way call mode.

Translation Services for Written Material

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

The following are methods of providing written translation of documents:

➤ **Human-Translation Services**

Human translation (i.e., non-automated translation provided by human, multi-lingual translators) services are available both locally in the CMCOG-COATS MPO region and through internet-based translation businesses who provide services nationally. A listing of selected providers is given in **Appendix G**.

➤ **Automated Translation (Google Translate, Bing Translator)**

Online automated translation services, such as Google Translate (<https://translate.google.com/>) or Bing Translate (<https://www.bing.com/translator/>), provide on-demand translation among multiple languages, as well as an application programming interface (API) that may be integrated into existing webpages. As an implementation step of this plan, CMCOG-COATS intends to implement Google Translate on the CMCOG-COATS MPO website. Similar to other agency sites, icons or hyperlinks that identify alternative languages and initialize Google Translate could be added to the webpage. The function would automatically translate website text into the user's language of choice.

The “Four I” Approach

The “Four I” Approach is a template for structuring the implementation process at each Contact Point, and is defined according to the following four (4) groups of activities:

1. Inform

Providing notice to LEP persons of the language assistance services available to them.

2. Identify

Recognizing LEP persons and identifying their preferred spoken language.

3. Interact

Accessing and using resources for language translation and interpretation.

4. Instruct

Training staff on the resources that will enable them to accommodate LEP persons.

Contact Points

Public Meetings

Public Meetings are the formally announced and advertised meetings conducted by the MPO, in fulfillment of its Unified Planning Work Program (UPWP) and Public Participation Plan (PPP). In large part, this encompasses the CMCOG-COATS MPO Board Meetings and periodic plan-specific public meetings for the Transportation Improvement Program, Long Range Transportation Plan, Public Participation Plan, and Coordinated Public Transit-Human Services Transportation Plan.

Public Meetings	
Inform	Legal Ad Press Releases Webpage Ad Notice of Language Services (venue)
Identify	Contact CMCOG-COATS prior to meeting Language Card
Interact	Telephone-Based Interpretation Service Designated Staff person
Instruct	Meeting Sign-In Process Accessing/Using the Telephone Based Interpretation Service

Inform

The advertisement requirements for Public Meetings are prescriptive, with a legal advertisement in a “newspaper of general circulation” being the standard method for fulfilling the legal requirement for meeting advertisement. Press releases, website postings/announcements, and email blasts to Interested Parties are supplemental advertisement techniques that the CMCOG-COATS MPO is committed to using, per its PPP.

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

ENGLISH:

“The content of this [advertisement / press release / posting] is available in alternative formats and other languages upon request by contacting the CMCOG-COATS Metropolitan Planning Organization (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 CMCOG-COATS MPO at least seven (7) days prior to the [meeting / event / activity]. Contact the MPO by phone at (803) 744-5133, by written letter addressed to 236 Stoneridge Drive, Columbia, SC, 29210 or by email to rsimmons@centralmidlands.org

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

Identify

Whether or not an LEP person contacts the MPO prior to a Public Meeting, the key identification point will be the Welcome/Sign-In station provided at the meeting venue. It is preferable that LEP persons “self-identify” themselves, as requested in the *Notice of Language Services*. The MPO will maintain a Language Identification Card as standard material for the Welcome/Sign-In station.

Interact

At each Public Meeting, the CMCOG-COATS MPO will have at least one trained staff person designated to interact with the LEP person(s) in attendance. This person will be trained in accessing and using the on demand telephone interpretation service, which will be used to facilitate discussion. An agency maintained cell-phone with speaker capability will be provided for this purpose. (Cell phone reception should be checked when evaluating venues as potential meeting sites.)

Instruct

Training for the Public Meeting Contact Point will address the following:

- Writing Legal Advertisements, Press Releases, and Webpage Postings – Training may or may not be required for staff who draft and assemble the various announcements and other materials in which the availability of language services is advertised.
- Identifying LEP Persons – Training is recommended for persons who will staff the Welcome/Sign-In Station. These staff should be familiar with the *Notice of Language Services* and use of the Language Identification Card.
- Interacting with LEP Persons – Training is critical for the person who is designated to interact with the LEP persons. These staff should be familiar with the access process and credentials for the on-demand interpretation service and have some experience with handling the dynamics of communication via interpreter. Learning through “shadowing” a person performing this function is recommended.

Office Walk-In

An Office Walk-In involves an LEP person or group visiting the CMCOG-COATS MPO at their office in person. While this method of contact may be infrequent, the purpose of such a visit may be more urgent and have a more weighty purpose—such as a discrimination complaint.

Office Walk-In	
Inform	Notice of Language Services (lobby) Language Reception Instructions (lobby)
Identify	Language Card
Interact	Telephone-Based Interpretation Service
Instruct	Reception Process

Walk-in visitors are typically unannounced, but may have called ahead to arrange a meeting with a certain staff person.

Inform

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

Identify

It is preferable that LEP persons “self-identify” themselves, as requested in the *Notice of Language Services*. The MPO will maintain a Language Identification Card at the Reception Desk, for use in discovering the language being spoken.

Interact

In all likelihood, the CMCOG-COATS receptionist will be the first contact point. Each reception staff person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion.

Instruct

Training for the CMCOG-COATS reception staff and the CMCOG-COATS MPO staff will address the following:

- Lobby Posters and other Bi-Lingual Informational Material – Training will identify the location, content, and use of the lobby posters and any other supplemental material developed for use in the CMCOG-COATS lobby to notify the LEP person of the availability of language services and the process that he or she can expect.
- Identifying LEP Persons – Training will focus on the use of the Language Identification Card.
- Interacting with LEP Persons – Staff will be informed about the credentials and access process for the telephone-based interpretation service. Instruction will also include general principles on interacting with an LEP person and the interpreter.

Telephone Call

Telephone calls to the CMCOG-COATS MPO would likely come through the main CMCOG-COATS phone number, in which case, they would be answered by the CMCOG-COATS reception staff. In particular, phone calls regarding language assistance services may be expected in reply to advertisements and other notices that request notification in advance of meeting.

Telephone Call	
Inform	Explanation of Services Available (through phone service)
Identify	Through Phone Service
Interact	Telephone-Based Interpretation Service
Instruct	Phone Answering Process

Inform

An LEP person who places a phone call to the CMCOG-COATS office will, in all likelihood, be responding to an advertisement, web posting, or other announcement that solicits the call for a purpose and provides notice about the availability of language assistance. In this case, the LEP person would be at least partially informed about the MPO’s commitment to make information available in other languages. A more expansive explanation of the specific language services provided and the expectations for how they are provided would be communicated once the language of the LEP person is identified and interpretation services are initiated.

Identify

The LEP person may not self-identify his or her preferred language, and the person taking the call may not be able to identify the language without help. In either case, assistance in identifying a caller’s language can be handled via the Telephone-Based Interpretation Service.

Interact

In all likelihood, the CMCOG-COATS receptionist will be the first contact point. Each reception staff person will be trained in accessing and using the on-demand telephone interpretation service, which will be used to facilitate discussion. Most all interaction with the LEP person will occur with the interpreter’s help. The receptionist may also transfer the call to the CMCOG-COATS MPO staff, which may require the use of advanced phone system features in transferring the call.

Instruct

Training for the CMCOG-COATS reception staff and the CMCOG-COATS MPO staff will address the following:

- Identifying LEP Persons – Training will focus on the process and expectations for how the Telephone-Based Interpretation Service will identify the LEP person’s language.
- Interacting with LEP Persons – Staff will be informed about the credentials and access process for the telephone-based interpretation service. Instruction will also include general principles on

interacting with an LEP person and the interpreter. Instruction about the telephone system features and process necessary to transfer the conference call to another person should be given to both reception staff and MPO staff.

Webpage

The CMCOG-COATS MPO’s site address is www.centralmidlands.org. The site provides a platform for disseminating information about its plans and programs, advertising, and upcoming activities. Contact with the CMCOG-COATS MPO through their website portal is one of the more likely contact points used by LEP persons, for many of the same reasons that non-LEP persons seek out a webpage. Information and answers to questions may be handled on a self-serve basis, which is typically more comfortable for most persons who are savvy with the internet and computer technology. There is much information already on the CMCOG-COATS MPO webpage that may be readily accessed. Beyond this, for an LEP person, looking up a webpage is far less confrontational than telephone or in-person contact.

Webpage	
Inform	Webpage notice
Identify	Self-Identify
Interact	Google Translate
Instruct	Web Standards/Protocol

As an implementation step of this plan, CMCOG-COATS MPO intends to implement Google Translate on the transportation website. In addition certain human-translated “vital documents” (identified previously) will be made available on the website in Spanish. To verify the accuracy of the Google Translate tool for the Spanish language, an analysis of the Spanish Google Translate output for the CMCOG-COATS MPO webpage was completed by a bi-lingual English/Spanish translator to verify the accuracy of the translation. Although some translational issues were identified, there were no substantive issues that would inhibit a speaker of Spanish from understanding the implied meaning of the text.

Inform

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

- Adding the *Notice of Language Services* to the CMCOG-COATS MPO webpage, with one or more links added in the navigation menu. Links would be placed under the “Public Participation Plan” and “Comments” sections. The *Notice* would display in Spanish and English.
- Adding a hyperlink to the *Notice of Language Services* adjacent to the Google Translate icon, when this tool is added to the webpage.

- Integrating the *Notice of Language Services* into the Google Translate tool, such that a new “popup” tab opens the first time a user activates Google Translate. The notice will display in Spanish and English.

Identify

Since use of the CMCOG-COATS MPO webpage would be self-directed, identification of the LEP person would be accomplished through the user’s selection of language through the Google Translate tool.

Interact

With an LEP Person accessing the webpage, interaction occurs according to the user’s preferences and access of the posted information. Translation of the webpage is automated, and interpersonal interaction is not expected. However, interactions with the webpage may be only an initial contact point, and may generate other contact points (phone call, walk-in, written correspondence, etc.)

Instruct

Minimal instruction of staff is required for the webpage contact point. Instead, the web page design and ease of use may require some thought about how LEP persons would approach and use the webpage. Training of the IT staff may be necessary for successful webpage integration of the Google Translate tool (web standards, protocols, HTML coding).

Written Correspondence

Contact through Written Communication includes both paper and electronic email correspondence. Both contact points are likely with LEP persons, as these communication methods are less confrontational and require minimal interpersonal interaction. Written correspondence may be very well suited for certain purposes, such as identifying an issue of concern or providing specific comments on a plan or program. In other cases, written correspondence will serve as a starting point for additional contact, whether a phone call, face-to-face discussion, or a webpage visit.

Written Correspondence	
Inform	Notice of Services Available
Identify	Language ID tools
Interface	Google Translate Translation services
Instruct	Translation services Other translation tools

Inform

Written correspondence may be the most accessible and well-advertised contact point for LEP persons, as most materials published by the CMCOG-COATS MPO include the office mailing address and an email address. On the CMCOG-COATS website, the office address appears at the bottom of every page, with CMCOG-COATS’s general phone and fax number. In addition, most persons— whether LEP or not—

understand the concept of written correspondence and its usefulness for accessing information, providing comments/feedback, and asking questions.

Similar to those who make a phone call to the CMCOG-COATS office, an LEP person who provides written correspondence will, in all likelihood, be responding to an advertisement, web posting, or other announcement that solicits the call for a purpose and provides notice about the availability of language assistance. In this case, the LEP person would be at least partially informed about the MPO's commitment to make information available in other languages.

Identify

Identifying the language of a paper copy, written document may require the contracted help of a translation service. The paper copy or electronic scan (PDF or other image format) would be provided to the translation service provider, which would identify the language and translate the document into English. A listing of translation service providers, including webpage and contact phone numbers, is provided in **Appendix G**.

For email or other written electronic correspondence, the contracted translation service may be used, or the "Detect language" function of Google Translate may be used to automatically detect the language. The electronic text would be copied into an automated translation tool (Google Translate, Bing Translator, etc.), which would detect the language assuming that it is one that is supported by the tool. Even if the translation is not fully accurate, this method should be sufficient to identify the language.

Interact

Some, but not all, of the correspondence from LEP persons will require a response, which would be the primary point of interaction. If the correspondence is simply providing feedback or comment on a plan or program, a response would be optional. Regardless, the response would be prepared in English and then translated into the language spoken by the LEP person. Since an accurate translation would be desired, the contracted help of a translation service would be used to prepare the response. Google Translate may be used if the message is simple and an immediate response is needed. However, since it is based on automated routines (as opposed to human translation), it may not accurately communicate the message desired.

Instruct

Training for the written communication contact point would focus on the selection and use of the various translation tools. The training will introduce the Google Translate tool and its capabilities, along with examples. The process for accessing the contracted translation service and the expectations for turnaround of a translation would also be described.

LEP Plan Coordination & Staff Training

As part of the LAP, the CMCOG-COATS MPO has identified resources and tools to be used in various contexts (i.e., Contact Points) to provide language assistance services. The resources and tools have been compiled into an *LEP Employee Resources Manual*, and staff expertise in using them will be developed through an *LEP Employee Training Presentation*. Reginald Simmons, the CMCOG-COATS MPO Transportation Director, has been designated as the Language Assistance Coordinator and will oversee the staff training activities.

LEP Employee Training Presentation

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

LEP Employee Resources Manual

The *Manual* is a compilation of the various resources and tools available to the CMCOG-COATS staff for providing language assistance. The *Manual* is comprised of tools and resources that are found in the Appendix of this LEP Plan Document. Versions of these materials are maintained in electronic (PDF) and paper copy (binder). Each staff member who participates in the *Training Presentation* will receive a paper copy of the *Manual*. Much of the material in the *Manual* is self-explanatory and may be used for a variety of training formats:

- On its own for brief “crash course”;
- With the guidance of a trained staff person for “one-on-one” training; or
- Alongside a copy of the Training Presentation for “self-paced” training.

Paper copies of the *Manual* will be maintained in the CMCOG-COATS receptionist’s desk and at the Welcome Center of CMCOG-COATS MPO public meetings, so that the language assistance materials are available for quick reference in serving LEP persons.

Plan Evaluation Process

The LAP, along with the larger LEP Plan, will be evaluated annually by interested staff or a committee assembled by the Language Assistance Coordinator, in compliance with current FHWA and FTA guidance. An update to the LAP will be considered a “technical update” and would not require public comment and re-adoption by the MPO unless the update substantially changes the public participation process.

The following materials are provided in **Appendix H** for use in the annual review process:

LEP Plan Self-Assessment Checklist

The LEP Plan Self-Assessment Checklist may be used as the overarching template for the assessment. The Checklist provides a series of questions designed to encourage discussion and critical thinking about the success of interactions (if any) with LEP persons, the usefulness of the plan provisions and LAP, and the evolving nature/growth of LEP populations and their needs in the CMCOG-COATS MPO region.

LEP Interaction Tracking Form

The LEP Interaction Tracking Form has two components that are used in documenting interactions with LEP persons:

- The *Record of Interactions* collects information about each interaction with an LEP person. Each row represents an interaction. Multiple copies of this form may be used in a given year.
- The *Annual Report Summary* draws from the Record of Interactions and serves as a one-page, annual report of the information collected about LEP interactions.

The *Record* and *Annual Report* are intended to inform certain questions asked in the Self-Assessment.

Sources

Federal Government's Renewed Commitment to Language Access Obligations under Executive Order 13166.

http://www.lep.gov/13166/AG_021711_EO_13166_Memo_to_Agencies_with_Supplement.pdf

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

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

LEP Handbook, Federal Transit Administration.

http://www.fta.dot.gov/documents/LEP_Handbook.doc

Overview of Title VI of the Civil Rights Act of 1964, Department of Justice.

<http://www.justice.gov/crt/about/cor/coord/titlevi.php>

Appendix

Appendix A	CMCOG-COATS MPO Title VI Assurance
Appendix B	Notification of Language Services
Appendix C	Title VI Notice to Beneficiaries
Appendix D	Title VI Complaint Form
Appendix E	Title VI Complaint Form Procedure
Appendix F	Language Identification Card Language Identification Survey
Appendix G	Translation & Interpretation Service Providers
Appendix H	Limited English Proficiency Plan Self-Assessment Checklist LEP Interaction Tracking Form: Record of Interactions LEP Interaction Tracking Form: Annual Report



Appendix A

CMCOG-COATS MPO TITLE VI ASSURANCE



COATS MPO Title VI Assurances

The COATS MPO HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The COATS MPO will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The COATS MPO will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

Benjamin J. Mauldin, Executive Director
CMCOG/COATS MPO

Date

(SIGNATURE OF AUTHORIZED OFFICER)

Appendix B

Notification of Language Services

Notice of Language Services

The CMCOG-COATS MPO provides language interpretation and document translation services upon request. If your preferred language is not English, please allow us to discover your preferred language and converse or correspond with you in that language. The following describes what you can expect when you interact with our staff ...

In-Person

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

By Phone

If you wish to call the CMCOG-COATS MPO, please call the main office number at (803) 744-5133 and request your preferred language. If the person answering your call cannot understand your request, he or she will ask you to wait a moment while a telephone-based interpretation service is contacted to assist in the conversation. Interpretation is available for many different languages, and is provided free of charge. Please be patient while we discover your language and bring the interpreter on the line.

By Written Correspondence

When writing correspondence to the CMCOG-COATS MPO, please write in your preferred language. Address paper correspondence to CMCOG-COATS MPO, 236 Stoneridge Drive, Columbia, SC 29212. Address email correspondence to rsimmons@centralmidlands.org. 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 CMCOG-COATS 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 available in paper copy through the CMCOG-COATS MPO office, and many are also available online at the MPO's website (www.centralmidlands.org).



Appendix C

Title VI Notice to Beneficiaries

Title VI Notice to Beneficiaries

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

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

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint. All complaints received are documented and assigned to the appropriate staff for investigation.

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

Mr. Reginald Simmons
MPO Title VI Compliance Officer
CMCOG-COATS MPO
236 Stoneridge Drive
Columbia, SC 29210

(803) 744-5133
rsimmons@centralmidlands.org
www.centralmidlands.org

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

A Complainant may file a complaint directly with the South Carolina Department of Transportation by filing a complaint with the Civil Rights Office, South Carolina Department of Transportation, 955 Park Street, P.O. Box 191, Columbia, SC 29201.



Appendix D

Title VI Complaint Form



CMCOG-COATS Metropolitan Planning Organization (MPO) Title VI Complaint Form

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

The following information is necessary for processing your complaint. If you require assistance in completing this form, please contact the CMCOG-COATS MPO Compliance Officer by calling (803) 744-5133. Please return the completed form to the CMCOG-COATS MPO Compliance Officer at CMCOG-COATS MPO, 236 Stoneridge Drive, Columbia, SC 29210. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Complainant Name:

Name of Individual Assisting Complainant:

Complainant Address:

Assisting Individual Address:

Complainant Phone:

Assisting Individual Phone:

Complainant Alt. Phone:

Assisting Individual Alt. Phone:

Which of the following describes the reason(s) the alleged discrimination took place?

- Race Age Color Gender Language/LEP National Origin Disability Retaliation

Date(s) of Incident: _____



Appendix E

Title VI Complaint Form Procedure

CMCOG-COATS Metropolitan Planning Organization (MPO) Title VI Complaint Form Procedure

The CMCOG-COATS MPO will acknowledge receipt of the complaint by notifying the Complainant within 7 calendar days of the “Date Received” shown above. The CMCOG-COATS MPO will transmit the complaint to the proper state or federal agency—Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the South Carolina Department of Transportation (SCDOT) for investigation and disposition pursuant to that agency’s Title VI complaint procedures.

1. Complete and return form to CMCOG-COATS MPO Compliance Officer at CMCOG-COATS MPO, 236 Stoneridge Drive, Columbia, SC 29210 within 180 calendar days from the alleged incident.
2. The complaint will be reviewed and investigated by the proper federal and/or State agency.
3. The State or federal agency will contact the complainant and CMCOG-COATS MPO to notify them of the results of the complaint.
4. If the Complainant is unsatisfied with the response, the complaint may be presented to the Department of Justice within 10 calendar days from receiving the response.
5. The Department of Justice will respond to the Complainant, and/or the Individual Assisting Complainant.
6. The CMCOG-COATS MPO Title VI Compliance Officer will maintain a log of all complaints received by the CMCOG-COATS MPO. The Title VI complaint log is available at the offices of CMCOG-COATS MPO, located at 236 Stoneridge Drive, Columbia, SC 29210.
7. A copy of the complaint and the investigative report/findings and remedial action plan, if appropriate, will be issued to the proper state or federal agency (e.g.: FHWA, FTA, and SCDOT) within 120 calendar days of receipt of the complaint.
8. A summary of the complaint and its resolution will be included as part of the Title VI updates to the proper state or federal agency (e.g.: FHWA, FTA, and SCDOT).
9. Records will be available for compliance review audits.

Appendix F

Language Identification Card

Language Identification Survey

Language Identification Cards

Side 1 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Mark this box if you read or speak English.	<i>English</i>
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	<i>Arabic</i>
<input type="checkbox"/> Խնդրում ենք նշում կատարել այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	<i>Armenian</i>
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্স দাগ দিন।	<i>Bengali</i>
<input type="checkbox"/> ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសាខ្មែរ ។	<i>Cambodian</i>
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	<i>Chamorro</i>
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	<i>Simplified Chinese</i>
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	<i>Traditional Chinese</i>
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	<i>Croatian</i>
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	<i>Czech</i>
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	<i>Dutch</i>
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید.	<i>Farsi</i>
<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	<i>French</i>
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	<i>German</i>
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	<i>Greek</i>
<input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	<i>Haitian Creole</i>
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	<i>Hindi</i>
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	<i>Hmong</i>
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszélí a magyar nyelvet.	<i>Hungarian</i>

Source: *Language Identification Flashcard - 2004 Census Test*

U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce

www.lep.gov/ISpeakCards2004.pdf

AOC

2012

Language Identification Cards

Side 2 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	<i>Italian</i>
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	<i>Japanese</i>
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	<i>Korean</i>
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກເວົ້າສາລາວ.	<i>Laotian</i>
<input type="checkbox"/> Kakölleiki bọok (box) in elaññe kwōjela kajin im waakin (read) majōl.	<i>Marshallese</i>
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	<i>Polish</i>
<input type="checkbox"/> Assinale este quadrado se você lê ou fala português.	<i>Portuguese</i>
<input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți românește.	<i>Romanian</i>
<input type="checkbox"/> Пометьте этот квадратик, если вы читаете или говорите по-русски.	<i>Russian</i>
<input type="checkbox"/> Обележите овај квадратих уколико читате или говорите српски језик.	<i>Serbian</i>
<input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	<i>Slovak</i>
<input type="checkbox"/> Marque esta casilla si lee o habla español.	<i>Spanish</i>
<input type="checkbox"/> Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	<i>Tagalog</i>
<input type="checkbox"/> โปรดกาเครื่องหมายลงในช่องสี่เหลี่ยมหรือรูปทศภาษาไทย.	<i>Thai</i>
<input type="checkbox"/> Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	<i>Tongan</i>
<input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	<i>Ukrainian</i>
<input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	<i>Urdu</i>
<input type="checkbox"/> Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	<i>Vietnamese</i>
<input type="checkbox"/> באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	<i>Yiddish</i>

Source: *Language Identification Flashcard - 2004 Census Test*

U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce 2012
www.lep.gov/ISpeakCards2004.pdf

Language Identification Survey

2004 Census Test	United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD	
<input type="checkbox"/> وضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Խնդրում ենք հշում կատարել այս քանակաւում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

Language Identification Survey (continued)

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

DB-3309

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

Language Identification Survey (continued)

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратички уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish



Appendix G

Human Translation & Interpretation Service Providers



**The Real
Yellow Pages®**

🔍 interpreters

📍 Columbia, SC

Home > Columbia, SC > Interpreters

Columbia, SC Interpreters About Search Results

BBB Rated A+/A All Filters Sort: Default



Languages Translation Services
(58)

Serving the Columbia area.
(888) 519-3521

Show Banner ▾

Translators & Interpreters

[Website](#) [Make Appointment](#) [More Info](#)

Ad



1 Languages Translation Services
(58) PREFERRED BBB Rating: A+

Serving the Columbia Area.
(888) 519-3521

Daniel was helpful from day day one The service was really fast. My doc was ready in less than 24hours and I got it on the mail in 3 days. Very sit...

Translators & Interpreters

[Website](#) [Make Appointment](#) [More Info](#)



2. Translation AZ
(15) PREFERRED

Serving the Columbia Area.
(800) 620-4789

I am running small marketing firm. We needed to translate some brochures into Spanish We were pleased with the quality and speed of delivery. Also...

Translators & Interpreters

[Website](#) [Get A Quote](#) [More Info](#)



3. Spanish Interpreters & Translation Services
(2) PREFERRED

Serving the Columbia Area.
(888) 266-4859

I contacted Rafael at the Service to interpret many hours of phone conversations and hundreds of text messages and emails. The response time back us...

Translators & Interpreters

[Website](#) [More Info](#)



4 Innerlingua Translation Service

Serving the Columbia Area.
(866) 774-5695

From Business: Innerlingua is a translation/transcription service company with clients all over the world in need of establishing good communications between their costumers and...

Translators & Interpreters

[Website](#) [More Info](#)



5. Ambassador Passport & Visa Services

Serving the Columbia Area.
(888) 265-4868

From Business. US Passports in as little as 24 Hours. Nationwide

Passport Photo & Visa Information & ...

[Website](#) [More Info](#)



6 Comunicar Language & Consling

3400 Colonial Dr, Columbia, SC 29203
(803) 400-1178

Translators & Interpreters

[Website](#)



7 Certified Translation Services

BBB Rating: A+
1 Harbison Way Ste 105, Columbia, SC 29212
(803) 781-7017

Translators & Interpreters

[Website](#)

Best Interpreters in Columbia, South Carolina with Reviews - YP.com

	8 Palmetto Interpreters 89 Groves Wood Ct, Columbia, SC 29212 (803) 233-7251	Translators & Interpreters Website
	9 Columbia Interpreters & Translators (1) 432 Buttonbush Ct, Columbia, SC 29229 (803) 221-0698 Very professional and efficient. Quick turn around on the translation of time sensitive documents. Will definitely use again!	Translators & Interpreters Website
	10 Palmetto Interpreters 1330 Richland St, Columbia, SC 29201 (803) 233-7251	Translators & Interpreters Website
	11 Angolika Woods Translations 204 Nautique Cir, Columbia, SC 29229 (803) 865-1236	Translators & Interpreters
	12 Corporate Spanish of Columbia, Inc. (2) Columbia, SC 29209 (803) 386-1705 Nice work! Dan at Southeast Spanish translated my wife's driver's license and birth certificate so that she could get her SC DL. Let me tell you th...	Translators & Interpreters
	13 Hispanic Connections 341 Fox Squirrel Cir, Columbia, SC 29209 (803) 765-0560	Translators & Interpreters Website
	14 Definitely Taking Requests Columbia, SC 29210 (803) 808-1286	Translators & Interpreters Website
	15 Niki's International LTD Columbia, SC 29201 (803) 255-0889	Translators & Interpreters
	16 Mota Intellectual Services 1215 Augusta Rd, West Columbia, SC 29169 (803) 796-8527	Translators & Interpreters
	17 Morgan Interpreter Services (1) Sumter, SC 29150 (803) 847-0698 THANK YOU FOR YOUR PROFESSIONAL AND COURTEOUS WORK. YOU WERE ON TIME, AND COMPLETELY CONFIDENTIAL. YOUR RATES ARE NOT BAD EITHER. I WILL	Translators & Interpreters
	18 Glindwen Oliver 1416 Calhoun St, Columbia, SC 29201 (803) 602-6977 From Business: Sports Medicine, Joint Replacement & Orthopaedic Surgeon	Physicians & Surgeons, Orthopedics Website Services Offered Directions More Info
	19 University of South Carolina-Columbia (343) Columbia-Campus, Columbia, SC 29208 (803) 777-7000	Colleges & Universities, Language Schools Website

Best Interpreters in Columbia, South Carolina with Reviews - YP.com

From Business: University of South Carolina.

 **20 University of South Carolina**
901 Sumter St, Columbia, SC 29208
(803) 777-3867
Colleges & Universities, Language Schools
[Website](#)

 **21 Agape English Language Institute**
1600 Park Cir, Columbia, SC 29201
(803) 445-1998
Language Schools

 **22 The Language Buzz**
1921 Henderson St, Columbia, SC 29201
(803) 252-7002
Language Schools
[Website](#)

 **23 Language Espresso**
4700 Forest Dr, Columbia, SC 29206
(803) 738-1100
Language Training Aids, Language Schools

 **24 Russian Language Ministries**
7640 Monticello Rd, Columbia, SC 29203
(803) 333-9119
Language Schools
[Website](#)

 **25 Bravo Lingua**
121 Northpoint Dr, Lexington, SC 29072
(803) 446-3354
Language Schools
[Website](#)

From Business: Spanish Lessons

 **26 L C C D C**
109 Singing Wood Ln, Elgin, SC 29045
(803) 227-8984
Language Schools

Sponsored Links

 **40-Hour Interpreter Training - Introduction to Community**
[www.apexidcorp.com/](#) *
Become an Interpreter: take our 40-hour class and be eligible to get certified!
Experienced Instructors Comprehensive Materials

 **Columbia Interpreters**
[www.localguides.com/](#) *
Find Columbia Interpreters: Phone Numbers, Addresses & Maps
Destinations: Atlanta, Boston, Chicago, New York, San Francisco, Seattle

 **Interpreter Schools**
[www.about.com/interpreter+schools](#) *
Search for Interpreter Schools Find Expert Advice on About.com
Trusted Guide 100+ Topics Trending News

Appendix H

**Limited English Proficiency Plan Self-Assessment Checklist LEP
Interaction Tracking Form: Record of Interactions LEP Interaction
Tracking Form: Annual Report**

CMCOG-COATS Metropolitan Planning Organization (MPO) Limited English Proficiency Plan Self-Assessment Checklist

LEP Plan Status											
Is CMCOG-COATS MPO receiving federal funding?	<input type="checkbox"/> Yes <input type="checkbox"/> No										
Date of the most recent LEP Plan/LAP:											
Date of most recent Four Factor Analysis:											
Date(s) of demographic data:											
Is an update to the current LEP Plan/LAP needed?	<input type="checkbox"/> Yes <input type="checkbox"/> No										
Interactions with LEP Persons											
Has CMCOG-COATS MPO interacted with any LEP persons during the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No										
If so, how many interactions with LEP persons were recorded?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;">At public meetings</td> <td style="width: 30%; padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">Office walk-in</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">Telephone call</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">Written correspondence</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">Webpage (e.g., Unique Google Translate users)</td> <td style="padding: 5px;"></td> </tr> </table>	At public meetings		Office walk-in		Telephone call		Written correspondence		Webpage (e.g., Unique Google Translate users)	
At public meetings											
Office walk-in											
Telephone call											
Written correspondence											
Webpage (e.g., Unique Google Translate users)											
Identifying LEP Communities											
Does CMCOG-COATS MPO have a process for collecting data on the number of LEP persons in the service area and the languages most commonly spoken?	<input type="checkbox"/> Yes <input type="checkbox"/> No										
How often is the language data for CMCOG-COATS MPO's service area analyzed?	Once every _____ years.										
What techniques and resources are used by CMCOG-COATS MPO to identify LEP communities? (e.g., spatial mapping, community input, etc.)	Describe: _____ _____ _____ _____										

Identifying LEP Communities (continued)

What data does CMCOG-COATS MPO use for identifying LEP communities and the languages most commonly spoken?

Describe: _____

SAFE HARBOR POPULATIONS

In the most recent Four Factor Analysis, what language group(s) **DID** meet the Safe Harbor Thresholds? Please list the LEP population, the percentage of the total service area population, and whether the population is increasing or decreasing vs. the previous Four Factor Analysis.

Language	LEP Population	% of Total Population	<input type="checkbox"/> Increasing <input type="checkbox"/> Decreasing
1.			
2.			
3.			
4.			
5.			

OTHER POPULATIONS

In the most recent Four Factor Analysis, what language group(s) **DID NOT** meet the Safe Harbor Thresholds? Please list the LEP population, the percentage of the total service area population, and whether the population is increasing or decreasing vs. the previous Four Factor Analysis.

Language	LEP Population	% of Total Population	<input type="checkbox"/> Increasing <input type="checkbox"/> Decreasing
1.			
2.			
3.			
4.			
5.			

Providing Notice of Language Assistance	
<p>How does CMCOG-COATS MPO inform the public about the availability of language assistance services? (e.g., posters, website, etc.)?</p>	<p>Describe: _____ _____ _____</p>
<p>In what language(s) does CMCOG-COATS MPO advertise language assistance services?</p>	<p>1. _____ 2. _____ 3. _____</p>
Providing Language Assistance	
<p>For the Safe Harbor LEP populations, what vital documents are translated?</p>	<p>1. _____ 2. _____ 3. _____ 4. _____ 5. _____</p>
<p>Does CMCOG-COATS MPO offer automated translation services on its website?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If so, what services are currently in use?</p>	<p><input type="checkbox"/> Google Translate <input type="checkbox"/> Bing Translator <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____</p>
<p>What are the top three (3) languages for which translation are most requested?</p>	<p>1. _____ 2. _____ 3. _____</p>

Training & Staff Resources	
<p>How does CMCOG-COATS MPO train staff for interacting with LEP persons? (e.g., identify language spoken, handle translation requests, access interpretation services)</p>	<p>Describe: _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
Monitoring and Updating the Language Assistance Plan	
<p>Is the LEP Plan and LAP available to the public for review? If yes, where is it available?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>If so, where is it available?</p>	<p>Describe: _____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>How often is the LAP updated (i.e., annually, biennially, etc.)?</p>	<p><input type="checkbox"/> Annually</p> <p><input type="checkbox"/> Biennially</p> <p><input type="checkbox"/> Every 3 years</p> <p><input type="checkbox"/> Every 4 years</p> <p><input type="checkbox"/> Every _____ years</p>
<p>When was the LAP last updated?</p>	<p>Date: _____</p>



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LEP Interaction Tracking Form

Record of Interactions

Year: _____ Page _____ of _____

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

LEP Interaction Tracking Form

Annual Report Summary

Year: _____

Interactions Summary		
Total Interactions	Successful Interactions	Unsuccessful Interactions
		Top Interaction Location

Language Summary	
Language	Number of Times Requested
West Germanic	
Spanish	

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

