



Un lugar especial. Para asegurar que siga siendo un lugar especial, la Comisión de Planeación y el personal de la oficina de planeación están trabajando en un nuevo plan integral de desarrollo que asegure que todos los residentes, todos los que viven, trabajamos o jugamos aquí.

PC y sus socios solicitaron a los residentes locales, funcionarios y otros interesados cómo que este lugar especial fuera aún mejor. En reuniones y eventos en todo el condado, se generaron ideas y se escucharon las voces de la comunidad. Hasta el momento, más de 100 personas han participado activamente en el proceso.

Importante para la comunidad, y esto es lo que hemos escuchado hasta ahora:

**CIÓN DEL CRECIMIENTO**  
**ión de comunidades compactas y transitables para peatones**

...avanzado, pero nos preocupa el tipo y la tendencia del desarrollo que vemos.

pendio de crecimiento hacia áreas designadas para preservar tierras de cultivo, espacios abiertos y recreación.

Estado de nuevas hogueras orientadas al suburbio y desarrollo comercial en los corredores principales, como Arriba, no nos da alegría porque no queremos que se pierda el carácter de estas áreas.

las comunidades existentes sobre todo nuestra ciudad y municipio, rehabilitar los edificios existentes y mejorar el espacio público.

ambio de uso que refleje el carácter de la comunidad y que refleje las tendencias tradicionales y el desarrollo. Busque algunas opciones recurrentes como residencias, que reflejen las tendencias tradicionales y el desarrollo. Busque algunas opciones recurrentes como residencias, que reflejen las tendencias tradicionales y el desarrollo. Busque algunas opciones recurrentes como residencias, que reflejen las tendencias tradicionales y el desarrollo.

a de otros usos, integrar de mejor manera el desarrollo de uso mixto en las comunidades existentes y a las empresas e iniciativas de negocios prácticas de planificación mostradas cómo podrían ser las mejores bien en la comunidad.

**LUGARES URBANOS**  
**Promover la reinvención a través de la rehabilitación y el cambio de uso**

Nos complace ver que la reinvención continúa en los lugares urbanos, sobre todo la ciudad y algunos pueblos, pero todavía hace falta mejorar.

...razones, a las ciudades y al carácter de estas áreas.

**EMPLEO**  
**Apoyar industrias y empleos del sector**

Queremos fortalecer las industrias existentes y crear nuevas.

...razones, a las ciudades y al carácter de estas áreas.

**TRANSPORTE**  
**Construir una red con más opciones**

Queremos un sistema de transporte que sea más integrado y que sea más accesible.

...razones, a las ciudades y al carácter de estas áreas.



# Limited English Proficiency Plan

Lancaster County, Pennsylvania  
 April 2023



LANCASTER COUNTY  
**PLANNING**  
 Lancaster, Pennsylvania

# Acknowledgments

## Lancaster County Board of Commissioners

Ray D'Agostino, *Chairman*  
Joshua G. Parsons, *Vice Chairman*  
John B. Trescot



## Lancaster County Planning Commission

Terry Martin, *Chair*  
Ben Bamford, *Vice Chair*  
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## Prepared by

Lancaster County Planning Department  
Lancaster, Pennsylvania  
April 2023

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## Lancaster County Metropolitan Planning Organization

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| Stephen Campbell         | Jeb Musser          |
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A plan to give people with limited English proficiency in Lancaster County access to our programs and activities.

Un plan para facilitar el acceso de las personas con dominio limitado del inglés en el condado de Lancaster a nuestros programas y actividades.

Ein Plan, um Menschen mit begrenzten Englischkenntnissen in Lancaster County Zugang zu unseren Programmen und Aktivitäten zu verschaffen.

Un plan pour permettre aux personnes ayant des compétences limitées en anglais dans le comté de Lancaster d'accéder à nos programmes et activités.

Một kế hoạch cung cấp cho những người có kỹ năng tiếng Anh hạn chế ở Hạt Lancaster tiếp cận với các chương trình và hoạt động của chúng tôi.

랭커스터 (Lancaster) 카운티의 제한된 영어 능력 개인이 우리 프로그램 및 활동에 참여할 수 있도록 허용하는 정책.

خطة للسماح للأشخاص ذوي المهارات المحدودة في اللغة الإنجليزية في مقاطعة لانكستر بالوصول إلى برامجنا وأنشطتنا.

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# Introduction

## Purpose

A Limited English Proficiency (LEP) Plan outlines how an organization's products and services can be made accessible to those who have a limited ability to read, speak, write, or understand English. This is the LEP Plan for Lancaster County Planning (LCP), which is comprised of the Lancaster County Planning Commission (LCPC), Lancaster County Municipal Planning Organization (MPO), and Lancaster County Planning Department (LCPD). As a recipient of federal funding, the MPO must meet specific requirements when providing services to communities with LEP. Although only the MPO is legally required to meet these requirements, the implementation of this plan will apply to all of LCP.

This plan is one component of LCP's overall public participation strategy. For more information on how we are reaching out to underrepresented communities, including people with LEP, please refer to our Public Participation Plan (PPP).

## Defining Limited English Proficiency

People with LEP are those who do not speak English as their primary language – in other words, they have a limited ability to read, speak, write, or understand English. Individuals with LEP are unable to effectively communicate in English, regardless of their native language (YAMPO, 2019).

Multilingual individuals that speak a language in addition to English are not typically considered to be LEP. Those that speak English as their primary language, but have a limited ability to read or write English, are also not

considered to be LEP. However, many of the strategies and resources outlined in this plan will also benefit those with lower literacy.

## Legal Requirements

As a recipient of federal funding through the U.S. Department of Transportation (USDOT), this plan is a necessary part of our compliance with Title VI of the Civil Rights Act and other related laws and regulations (DVRPC, 2019). The MPO is required to take “reasonable steps” to provide people with LEP “meaningful access” to its products and services (YAMPO, 2019). This plan will follow current USDOT guidance for accommodating LEP individuals (USDOT, 2023).

## Four-Factor Analysis

A four-factor analysis can be used to determine which communities with LEP require translated materials in Lancaster County. The analysis considers these factors:

- Number and proportion of people with LEP in Lancaster County
- Frequency with which LEP individuals come in contact with LCP programs, activities, and services
- Importance of programs, activities, and services offered by LCP to LEP populations
- Available resources and overall costs to LCP

## Five-Step Process (DVRPC, 2019)

The results of the four-factor analysis can then be incorporated into an actionable five-step process, which includes the following components:

- Identifying Community Needs
- Language Assistance Measures
- Staff Training
- Outreach
- Monitoring and Plan Updates

### **Safe Harbor and Vital Documents (DVRPC, 2019)**

The USDOT threshold for addressing language needs is called the Safe Harbor provision. In short, all “vital documents” should be accessible to people with LEP who primarily speak a language with more than 1,000 speakers in the county or make up at least 5% of the total county population (whichever is less). The four-factor analysis provides guidance on determining which documents are vital. Offering translations of these documents is generally considered “strong evidence” for LEP compliance, but it can also be achieved with fewer translated materials depending on the resources of the department and cost of translation services.

### **Title VI Policy**

It is the policy of the Lancaster County Transportation Coordinating Committee (LCTCC) to comply with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, E.O. 12898, and related statutes and regulations in all programs and activities. These regulations require that

no person in the United States shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which it receives Federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with LCTCC. Any such complaint must be in writing, signed by the complaining person(s) or representative(s), and filed with the LCTCC Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. A copy of Title VI Discrimination Complaint Form can be obtained from LCP by calling the office or visiting our website at <http://www.lancastercountyplanning.org>. For assistance completing the form or translation and interpretation services, contact us at 717-299-8333.

This policy was adopted in June of 2014. To learn more, visit the Title VI summary on our website at <https://www.lancompo.org/title-vi>.

# Quick Reference

## Basic Requirements

- Translate vital documents into LEP required languages (Spanish and Vietnamese)
- Provide language access request taglines in all new documents
- Maintain relationships with communities that speak PA Dutch
- Translate Full Translation List (see [Table 5](#))

## Action Timeline

### *Annually*

- Train staff on LEP Plan
- Send staff an LEP survey
- Review LEP analytics and requests
- Review ACS data for changes to requirements

### *2023*

- Translate language access request taglines
- Set up an LEP request phone inbox
- Incorporate LEP guidelines into new programs
- Adhere to LEP guidelines in all notices for public meetings
- Confirm and document the lack of written translation needs for the German or other West Germanic language group

### *2024*

- Use language access request taglines
- Include LEP in TIP public feedback process
- Create a web accessibility policy

### *2025*

- Create translated summary pages for website
- Make summaries of vital documents text-based
- Include relevant LEP notices on new website
- Apply web accessibility policy to new website

### *2026*

- Translate places2040 summary

### *2027*

- Translate Active Transportation Plan summary

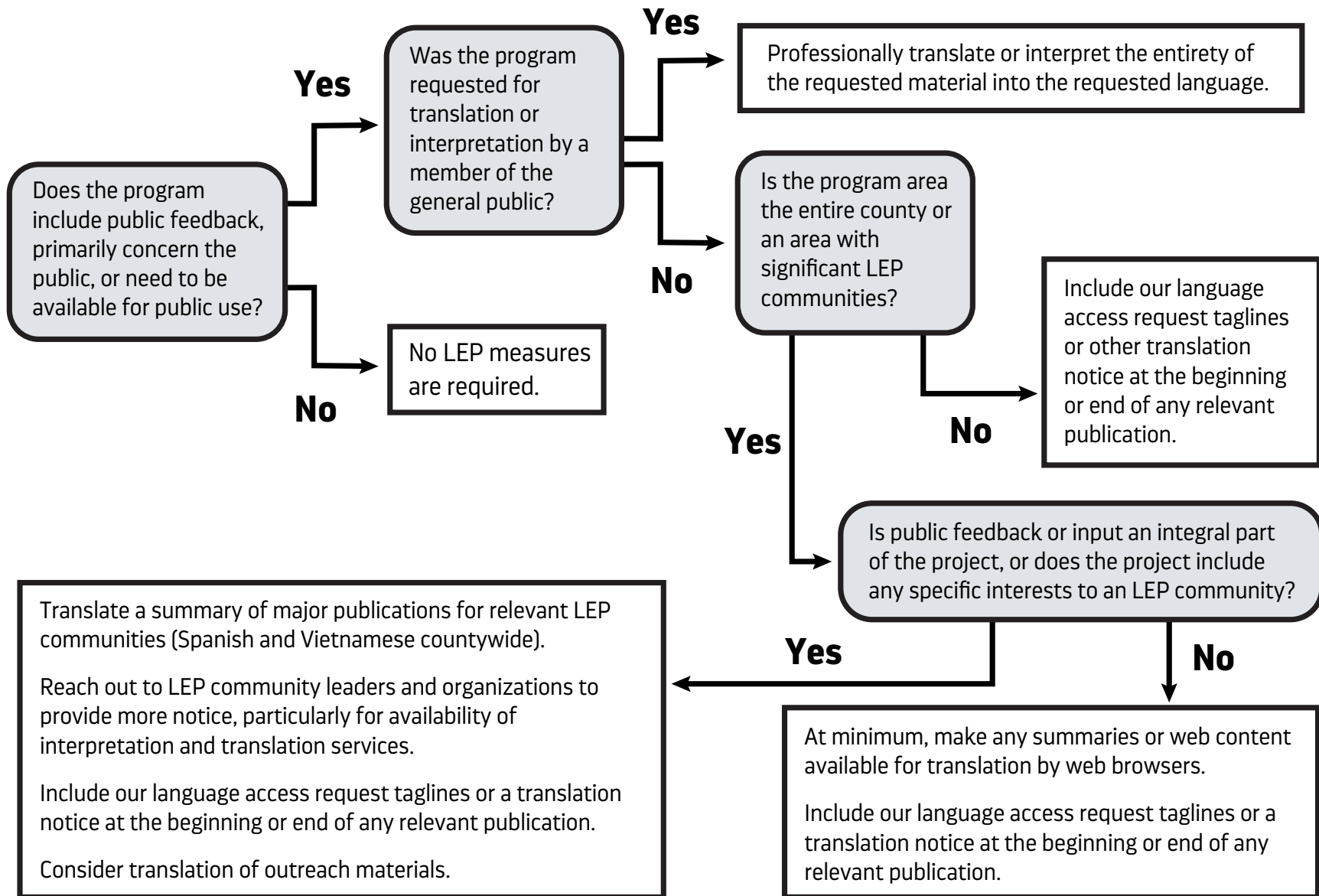
### *2028*

- Translate connects2040 summary
- Adopt new LEP Plan

## Recommendations

- Translate materials at the end of each calendar year with remainder of \$500.00 annual budget
- Use plain language on the web
- Include translation in new consulting contracts and Requests for Proposals (RFPs)
- For the TIP, create request taglines to be used on social media

## Program Requirements Flowchart





# Five-Step Process

To implement this plan, we will follow a five-step process that identifies community needs, outlines various language assistance tools, and provides guidance on how to train staff, conduct outreach, and monitor the plan for potential updates.

## Identifying Community Needs

To identify the needs of limited English proficient (LEP) individuals in Lancaster County, we will use a four-factor analysis.

### Four-Factor Analysis

The four-factor analysis is considered by USDOT as an acceptable method to determine which languages require LEP measures, and how extensive those measures should be to adequately provide services to these communities.

#### Number and Proportion of People with LEP in Lancaster County

[Table 1](#) shows the number of people with limited English proficiency. In Lancaster County, there are approximately 29,273 people who speak a language other than English and speak English “less than very well.” This accounts for 5.6% of the county’s total population.

[Table 2](#) shows the languages spoken at home. In Lancaster County, the most spoken non-English languages (excluding those primarily categorized as “other”) are 1) Spanish, 2) German or other West Germanic languages, 3) Vietnamese, 4) Russian, Polish, or other Slavic languages, 5) Arabic, 6) French, Haitian, or Cajun, and 7) Korean. Tagalog (including Filipino) and Chinese (including Mandarin and Cantonese) do not have 1,000 speakers in Lancaster County, much less those with LEP.

**Table 1 People with Limited English Proficiency in Lancaster County**

|   | <i>Number</i>  | <i>% of Total Population</i> |
|---|----------------|------------------------------|
| <b>Total population (5 years and over)</b>                                  | <b>519,674</b> | <b>100.00%</b>               |
| Speak English only  | 436,071        | 83.90%                       |
| Speak a language other than English and speak English “very well”           | 54,330         | 10.45%                       |
| Speak a language other than English and speak English “less than very well” | 29,273         | 5.60%                        |

Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates

**Table 2 Language Spoken at Home in Lancaster County**

|  | <i>Number</i>  | <i>% of Total Population</i> |
|--|----------------|------------------------------|
| <b>Total population (5 years and over)</b> | <b>519,674</b> | <b>100.00%</b>               |
| English only                               | 436,071        | 83.90%                       |
| Spanish                                    | 33,429         | 6.43%                        |
| German or other West Germanic Languages    | 27,840         | 5.36%                        |
| Other Indo-European languages              | 5,803          | 1.12%                        |
| Other and unspecified languages            | 4,148          | .80%                         |
| Other Asian and Pacific Island languages   | 2,916          | .56%                         |
| Vietnamese                                 | 2,409          | .46%                         |
| Russian, Polish, or other Slavic languages | 1,661          | .32%                         |
| Arabic                                     | 1,513          | .29%                         |
| French, Haitian, or Cajun                  | 1,469          | .28%                         |
| Korean                                     | 1,227          | .23%                         |
| Tagalog (including Filipino)               | 800            | .15%                         |
| Chinese (including Mandarin, Cantonese)    | 388            | .07%                         |

Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates

**Table 3 Populations That Speak English “Less Than Very Well” in Lancaster County**

|   | Number of<br>Individuals | % of Total<br>Population |
|---|--------------------------|--------------------------|
| <b>Total population (5 years and over)</b>            | <b>519,674</b>           | <b>100.00%</b>           |
| Speak English only                                    | 436,071                  | 83.90%                   |
| <i>Speak English “less than very well” and speak:</i> |                          |                          |
| Spanish   | 12,051                   | 2.32%                    |
| German or other West Germanic Languages               | 7,970                    | 1.53%                    |
| Other and unspecified languages                       | 3,133                    | .60%                     |
| Other Indo-European languages                         | 1,801                    | .35%                     |
| Vietnamese  | 1,675                    | .32%                     |
| French, Haitian, or Cajun                             | 742                      | .14%                     |
| Arabic  | 478                      | .09%                     |
| Russian, Polish, or other Slavic languages            | 422                      | .08%                     |
| Korean  | 347                      | .07%                     |
| Other Asian and Pacific Island languages              | 358                      | .07%                     |
| Chinese (incl. Mandarin, Cantonese)                   | 203                      | .04%                     |
| Tagalog (incl. Filipino)                              | 93                       | .02%                     |

Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates

Table 3 shows the populations that speak English “less than very well” in Lancaster County. Based on this data, the language groups that currently meet the Safe Harbor threshold of 1,000 residents with LEP include 1) Spanish, 2) German or other West Germanic languages, and 3) Vietnamese.

We are required to provide meaningful access to our programs and services for these three language groups. Access should be provided for all communities in the Spanish and Vietnamese language groups. However, special considerations should be made regarding the needs of the German or other West Germanic language group. According to the 2020 Census, Lancaster

County has a large population of DA Dutch/PA German speakers who account for most of the German or other West Germanic language group.

To accommodate the German or West Germanic language group, PA Dutch was determined to be the language community we should provide access to. However, PA Dutch is not a written language. Lancaster County Planning (LCP) consulted with Donald Kraybill of Elizabethtown College and Leroy Hopkins, formerly of Millersville University, and confirmed that the language is not used in writing. LCP also contacted the local Amish Steering Committee to further corroborate this information.

Additionally, LCP reached out to the Federal Highway Administration (FHWA) and PennDOT to clarify the requirements for a language community that meets the Safe Harbor threshold but does not need written translations. They recommended that we continue to research the needs of the PA Dutch language community and determine if there is a need for translating materials into modern German. By documenting the needs of this language group and outlining how to request the translation of materials into modern German, we are providing meaningful access to this language group. For more information on requesting a modern German translation, see the “Language Access Request Fulfillment” section on p. 21.

Although some language groups characterized by “other” also have over 1,000 residents with LEP, these categories represent too many languages to qualify for the threshold. These groups will not be considered to have met the Safe Harbor provision until there is better federal data on individual languages, or there is a specific reason to consider another language.

It’s important to note that more localized programs may require less coverage than a countywide plan. For example, staff developing regional plans should review the data at the region-level to determine which communities should be prioritized.

### **Recommendation**

*Confirm and document the lack of written translation needs for the German or other West Germanic language group. Reach out to PA Dutch and modern German language institutions, such as the Amish Safety Group and Lancaster Liederkrantz, to ensure their needs are being met.*

### **Frequency with Which LEP Individuals Come in Contact with LCP Programs, Activities, and Services**

Understanding how people with LEP interact with Lancaster County Planning (LCP) can help us determine where we need to improve our language assistance resources and expand our outreach efforts. Language communities with a large LEP population will need more support and resources. Communities that meet the LEP Safe Harbor threshold, but historically have little to no interaction with LCP, will likely need additional effort to adequately reach them. Over the last five years, LCP has had the following interactions with LEP populations:

#### **Formal Complaints**

The MPO has had no formal complaints filed against it through the Title VI Complaint Process.

#### **Requests for Translation or Interpretation Services of Documents and Meetings**

LCP has had no requests for document translation.

#### **Public Input Received in a Language Other Than English**

LCP met with local leaders of Plain communities (a local concentration of the German or other West Germanic languages population) and Spanish-speaking communities for the creation of [places2040](#), the county comprehensive plan. Public input was not received in languages other than English, but language community representatives

helped shape the plan. Outreach to Plain leaders was more successful than outreach to Spanish-speaking communities during that process. Otherwise, LCP has received no public input in a language other than English in this timeframe.

### **Views and Interactions with Relevant Pages on the MPO website**

In 2021, the *Socios en el Transporte* page received 47 views which accounted for 1.75% of the overall site traffic. The MPO's Translate page, which includes notice of the availability of web services such as Google Translate and a translation request form, received 37 views. Unfortunately, we cannot differentiate how many of those views were internal. However, these two pages made up 3.13% of all traffic to the site, and there were no requests made on the translate page or to any linked contacts. *Note: This data is limited to one year.*

### **Recommendation**

*When LCP creates a new website, the ability to screen local access to these pages should be discussed with consultants. Consultants translating any summary pages should also be a part of the conversation.*

### **Interactions with LEP Individuals Experienced by Staff**

Using a Google Poll, we asked staff about the number of interactions they had with LEP individuals. Overall, slightly less than half (47.8%) of our staff have had LEP interactions rarely, or at least once in the last five years. Only one staff member had a higher frequency of LEP interactions, selecting "sometimes" for in person interactions. Another staff member noted that they were asked about Spanish interpretation during the *places2040* development process, and two additional staff members were approached about the availability of the plan in Spanish. For this reason, *places2040* will be prioritized for translation in the future. One staff member recommended that we provide translation service notice materials at the front desk of our office.

Based on these metrics, LCP has had occasional community interactions with Spanish-speaking individuals, but no significant interactions with any other language group. The MPO website is meeting the current demand of Spanish readers using the Español page. In the future, LCP should undergo more outreach efforts to its three required LEP populations. For more information on how we plan to reach these required populations, please refer to the “Outreach” section of this plan on p. 9, or our Public Participation Plan (PPP).

**Importance of Programs, Activities, and Services Offered by LCP to LEP Populations**

The work of LCP, and the MPO in particular, has a significant impact on the lives of all residents in Lancaster County. In [connects2040](#), the Metropolitan Transportation Plan (MTP) for Lancaster County, we outline our commitment to invest in communities that have been historically underrepresented and underserved by the planning profession. These communities were determined through an environmental justice impact analysis of our Transportation Improvement Program (TIP) and Long-Range Transportation Plan. As stated in the PPP, it is key for LCP to provide opportunities for public feedback and involvement to all communities in the county. This is especially true for our most impactful plans and programs, such as [places2040](#) and the TIP. Providing LEP coverage should be an essential part of any public outreach effort.

While the work of LCP and the MPO is interwoven and interdependent, the MPO has a direct impact on the quality and accessibility of the transportation network within Lancaster County. Therefore, the MPO has an obligation to take measured steps to include LEP communities in relevant planning decisions. LCP should prioritize providing access to major plans, such as [places2040](#) and [connects2040](#), as well as any programs and events that include public input.

**Table 4 Costs to Translate Documents into Spanish\*\***

| <i>Translation Year</i> | <i>Cost</i> | <i>Word Count</i> | <i>Cost per Word</i> |
|-------------------------|-------------|-------------------|----------------------|
| 2017                    | \$353.00    | 3948              | \$0.09               |
| 2019                    | \$178.86    | 1626              | \$0.11*              |
| 2020                    | < \$50.00   | 523               | < \$0.10             |

Source: US Census Bureau, 2021 American Community Survey 1-Year Estimate

\* Billed per word.

\*\* Costs are based on services provided by Fox Translation Services and may vary by provider.

**Available Resources and Overall Costs to LCP**

LCP has an annual translation budget of \$500 per year. This amount is likely to remain fixed for the duration of this plan. With 4,619 words and an estimated cost of \$0.11 per word, translating the Executive Summary of [places2040](#) into one language could easily surpass this yearly budget. Although the Action Timeline for translating materials considers the approximate availability of funds for each year, it may need adjusted due to limited resources.

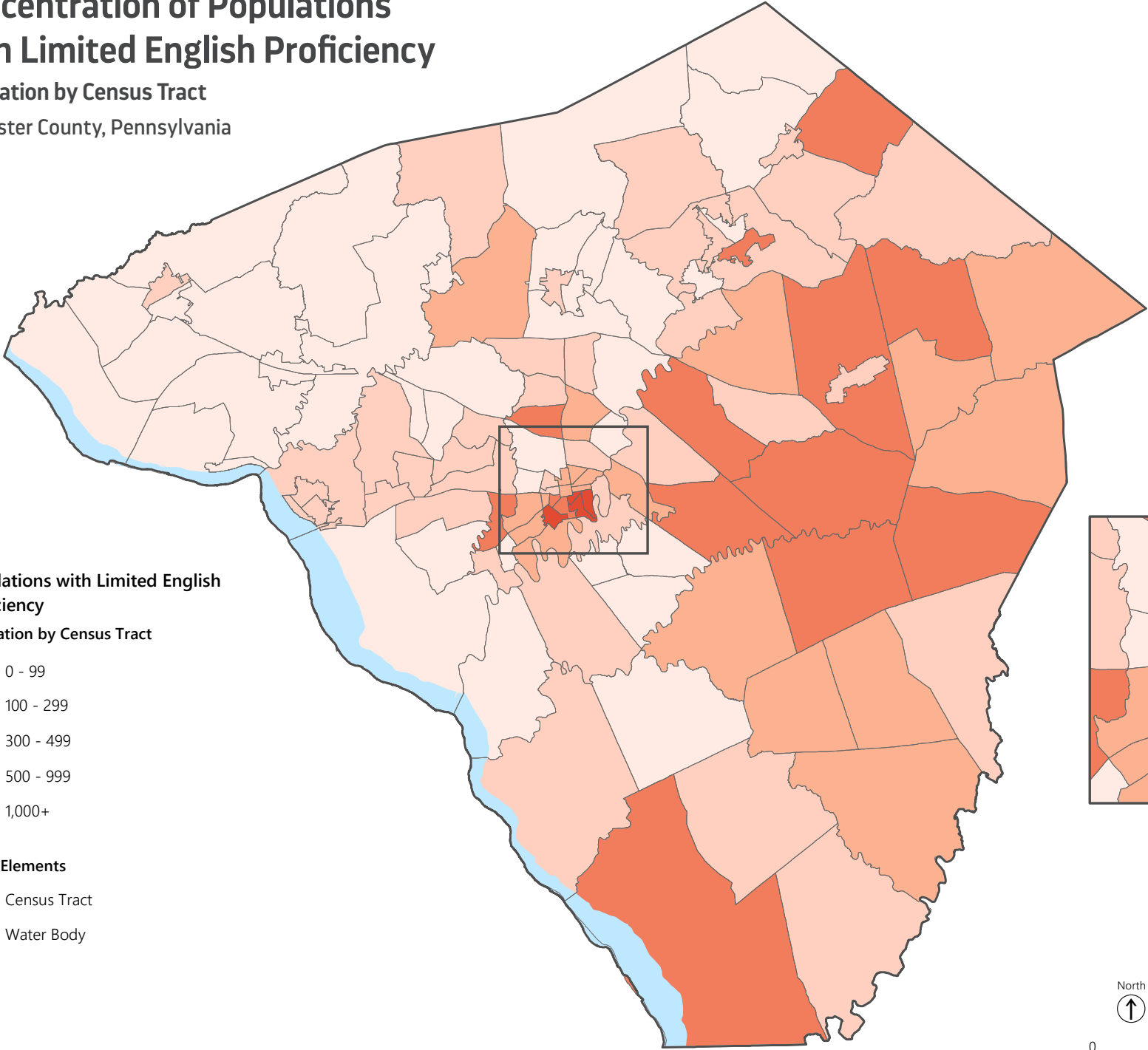
As our allotted yearly budget must also cover requested translation services, translations scheduled in this plan should be made at the end of the fiscal year using any remaining funds. Any requests for translation services made during this time can be delayed until the beginning of the next fiscal year. LCP’s fiscal year begins on January 1, so scheduled translations should be billed in December.

**Recommendation**

*Translate scheduled materials at the end of our fiscal year (in December) using any remaining translation funds.*

# Concentration of Populations with Limited English Proficiency

Population by Census Tract  
Lancaster County, Pennsylvania

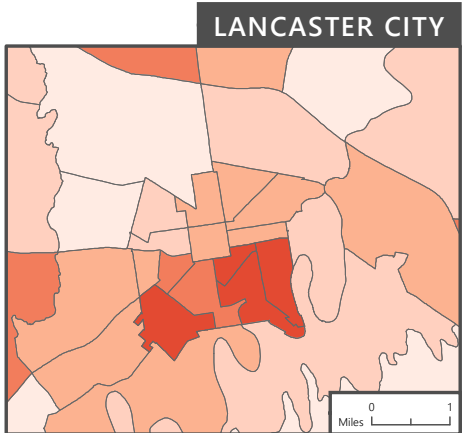


## Populations with Limited English Proficiency

Population by Census Tract

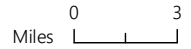
- 0 - 99
- 100 - 299
- 300 - 499
- 500 - 999
- 1,000+

- Other Elements
- Census Tract
  - Water Body



Source: ESRI Business Analyst, 2022.  
Lancaster County GIS, Copyright (c) 2023.  
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For complete disclaimer see:  
<https://www.co.lancaster.pa.us/1187/Disclaimer>



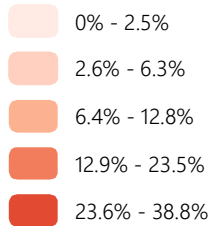
# Concentration of Populations with Limited English Proficiency

Percent by Census Tract

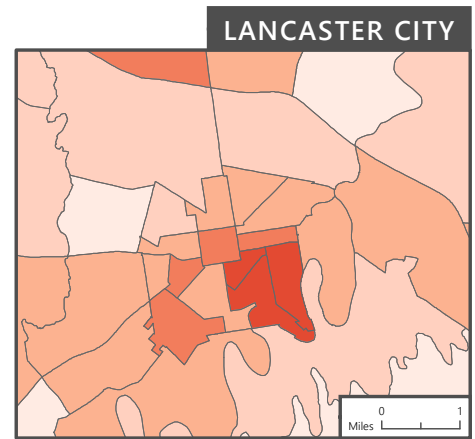
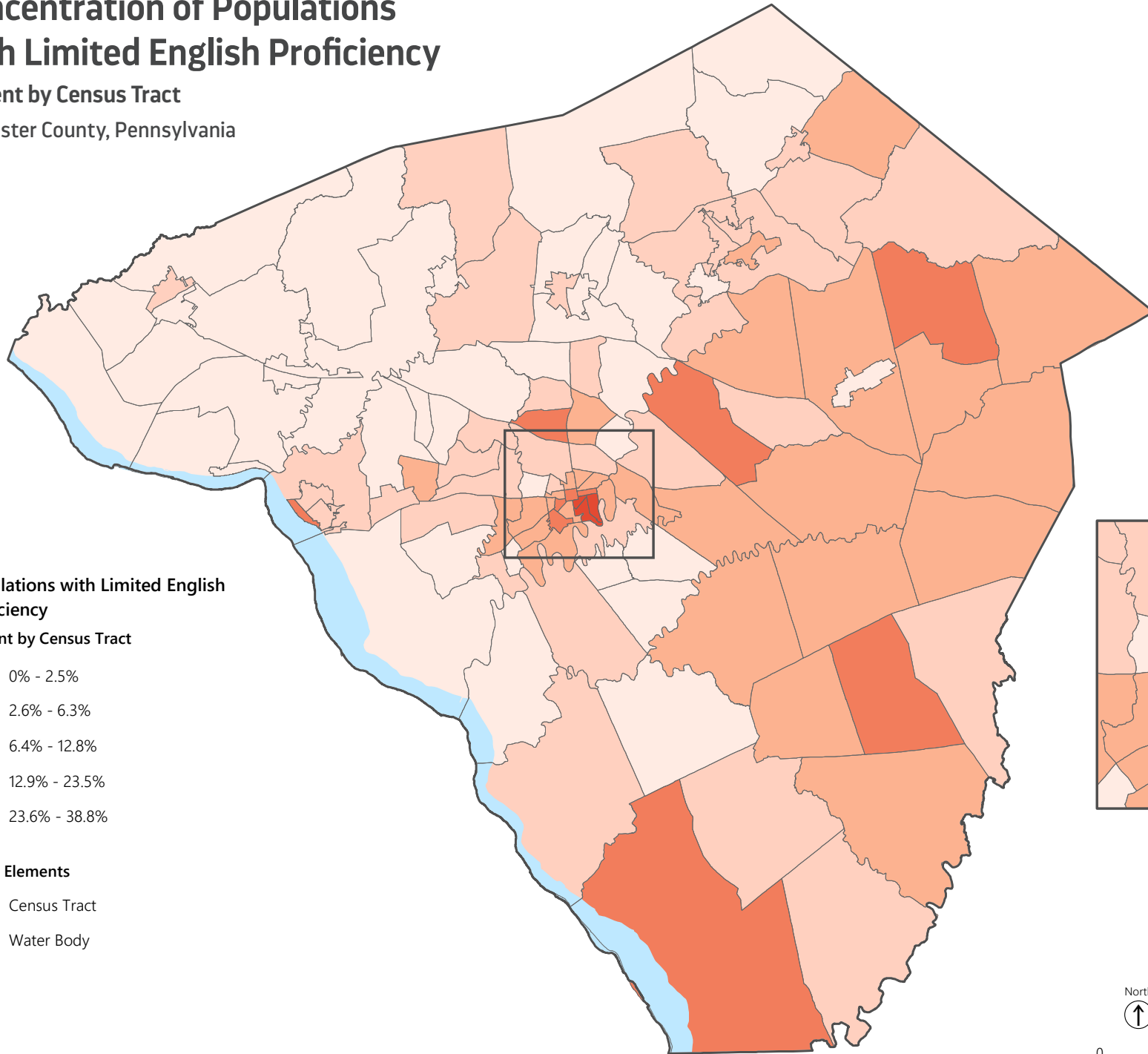
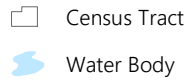
Lancaster County, Pennsylvania

## Populations with Limited English Proficiency

Percent by Census Tract



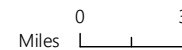
## Other Elements



Source: ESRI Business Analyst, 2022

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## Language Assistance Measures

### Interpretation (Spoken and Signed Language Assistance)

Interpretation, or interpreting, is the practice of translating the spoken words of a person into a different language, either orally or through sign language. LCP must make reasonable efforts to provide interpretation services for people with LEP. Additionally, the competency of the language service provider should be verified to maintain the quality and accuracy of services provided. LCP uses language services from Fox Translation Services, an acceptable interpretation service according to USDOT. Based on our past encounters with LEP individuals and the cost of interpretation services, LCP provides interpretation services upon request only. Requests for interpretation services must be submitted five days prior to any public meeting. Currently, LCP provides notice of available interpretation services in newspaper legal notices. We will be expanding that outreach effort as part of this plan.

### Translation (Written Language Assistance)

Translation refers to written materials that are pre-translated, as well as those that are only translated upon request. LCP has offered pre-translated material in the past, mostly throughout the places2040 development process. Currently, there is only one piece of pre-translated material provided by LCP: the Español page of the MPO's website. Following guidance in this plan, LCP will offer more pre-translated materials in the future. For more information on the documents to be pre-translated, see [Table 5](#).

LCP provides language translation services upon request. Requests can be made at <https://lancastercountyplanning.org/translate>. LCP also takes requests for translation services by letter or email, in person, or over the phone. See p. 9 for more information on how LCP will improve its efforts to inform the public of the availability of translation services, particularly with the language access request taglines.

### Accessible Web Translation

LCP is undergoing an effort to move most of its materials online. The MPO website contains accessibility measures recommended by the ADA.

#### **Recommendation**

*Create a department-wide web accessibility policy that meets ADA standards.*

Web translation services like Google Translate are becoming more proficient at translating web materials and are increasingly used by organizations for their translation capabilities. By publishing content online, these services can be utilized for translation needs. Existing materials deemed vital in formatted documents should be converted to HTML-based text content to ensure that these web services can be used. Through these services, LCP will be able to offer better access to existing documents and future publications.

#### **Recommendation**

*Vital existing documents should be converted and published online in a text-based format to make use of free services like Google Translate.*

## Staff Training

This section outlines how Lancaster County Planning Department (LCPD) staff will be trained on the elements of this plan to ensure that it is successfully implemented. All LCPD staff will receive an initial training for this plan when it is adopted, and yearly afterwards. The yearly training will coincide with the Monitoring and Plan Updates step of the Five-Step Process. Training will be conducted jointly for this plan and the PPP. Moving forward, new hires will be trained on their role in LEP compliance as part of the onboarding process.

Each training session will inform staff members about the tools and guidelines outlined in this plan, including:

- An overview of our LEP policy, requirements, and resources
- A timeline of the current plan and the individual roles and responsibilities of staff
- Guidance on using our language access request taglines and other tools to provide notice to people with LEP
- How to use the Quick Reference to determine the LEP requirements for any program
- Suggestions for communicating with LEP individuals in person and over the phone

## Outreach

To implement this plan, we will need to build on the outreach efforts we have made in the past.

### Current Outreach

Prior to this plan, LCP provided notice to populations and persons with LEP by:

- Professionally translating a summary page of the MPO website into Spanish (<https://www.lancompo.org/espanol>)
- Adding a Google Translate option to the LCP website (<https://lancastercountyplanning.org/translate>)
- Publishing our Title VI statement on the MPO's website (<https://www.lancompo.org/title-vi>)
- Providing notice of the translation services available for MPO publications, as well as the ability to use Google Translate (<https://www.lancompo.org/translate>)
- Providing newspaper legal notice on the availability of interpreters for public meetings (with a five-day request period)



## Action Timeline

To implement this LEP Plan and actively engage our LEP communities, LCP will continue to provide all existing services, while taking the following next steps:

### **Immediately**

- Adhere to LEP guidelines in all notices for public meetings (LCPC, MPO, TTAC, ATAC, TIES).
- Publish any new executive summaries (and the full text of certain documents) as text-based web pages so they can be translated by web browsers.

#### **Recommendation**

*Consider using plain language when publishing materials to a web page that may be translated.*

### **Within One Year**

- Obtain professional translations of our language access request taglines.
- Set up a phone inbox with multilingual prompting to facilitate requests for translation services.

#### **Recommendation**

*Include translation services in consultant contracts on any new programs, particularly those involving vital documents.*

### **Within Two Years**

- Include our language access request taglines at the beginning of any new publications or presentations, whether they are printed or offered digitally. Insert the same taglines into existing electronic publications that are updated as a result of this plan or the PPP.
- Include LEP measures in the TIP public feedback process.
- Create a department-wide web accessibility policy that meets ADA standards.

#### **Recommendation**

*For the TIP, create specific interpretation and translation taglines for social media feedback that can be uploaded as a comment on a post. Consider creating taglines that could be applicable to a wide variety of social media posts.*

### **Within Five Years**

- Republish executive summaries (and the full text of certain documents) as text-based web pages so they can be translated by web browsers.
- Offer pre-translated summaries of vital documents.
- With future updates of the LCP website, create summaries for each major part of the site, and translate these summaries.
- With future updates of the LCP website, include all relevant Title VI, Environmental Justice, and other LEP notice content as required of the MPO.

The steps outlined above will occur over the next five years. This timeline will allow LCP to spread the costs of fulfilling our LEP duties according to our annually allotted resources.

| 2023  | 2024   | 2025   |
|---|--|--|
| <ul style="list-style-type: none"> <li>• Translate our language access request taglines</li> <li>• Set up a phone inbox to facilitate requests for translation services</li> <li>• Incorporate LEP guidelines into any new programs</li> <li>• Adhere to LEP guidelines in all notices for public meetings</li> </ul> | <ul style="list-style-type: none"> <li>• Include our language access request taglines at the beginning of any new publications or presentations</li> <li>• Include LEP measures in the TIP public feedback process</li> <li>• Create a web accessibility policy</li> </ul> | <ul style="list-style-type: none"> <li>• Create translated summaries of vital web pages</li> <li>• Move summaries of vital documents to the web and begin writing new summaries as plain language web pages</li> <li>• Include all relevant LEP notices on new website</li> <li>• Ensure the new LCP website complies with the web accessibility policy</li> </ul> |
| 2026  | 2027   | 2028   |
| <ul style="list-style-type: none"> <li>• Translate Executive Summary for places2040</li> </ul>  | <ul style="list-style-type: none"> <li>• Translate Executive Summary for the Active Transportation Plan</li> </ul>   | <ul style="list-style-type: none"> <li>• Translate Executive Summary for connects2040</li> <li>• Adopt new LEP Plan</li> </ul>   |

## Monitoring and Plan Updates

Monitoring this plan will be a critical step in its implementation. We will keep the plan current by regularly training staff and updating the plan to include more recent data. LCP will review their language access measures annually. The MPO also undergoes federal certification for LEP compliance every four years.

On an annual basis, LCP will:

- Survey staff about language skills and the frequency of contact with people with LEP
- Review analytic data related to translated material, including web pages

- Review ACS data to monitor changes in populations with LEP and other language needs
- Review requests for and costs of translation or interpretation services
- Train staff on the LEP Plan and their role in its implementation

Within five years of the adoption of this plan, LCP will adopt a new LEP Plan. With the adoption of this plan and each subsequent plan, LCP will review existing documents and communication channels to determine if they require additional language assistance measures.

# Translating Existing Documents

The table below lists the vital existing documents and the translations that they will need to meet LEP requirements. For information on when these translations will take place, see the Action Timeline beginning on p. [9](#).

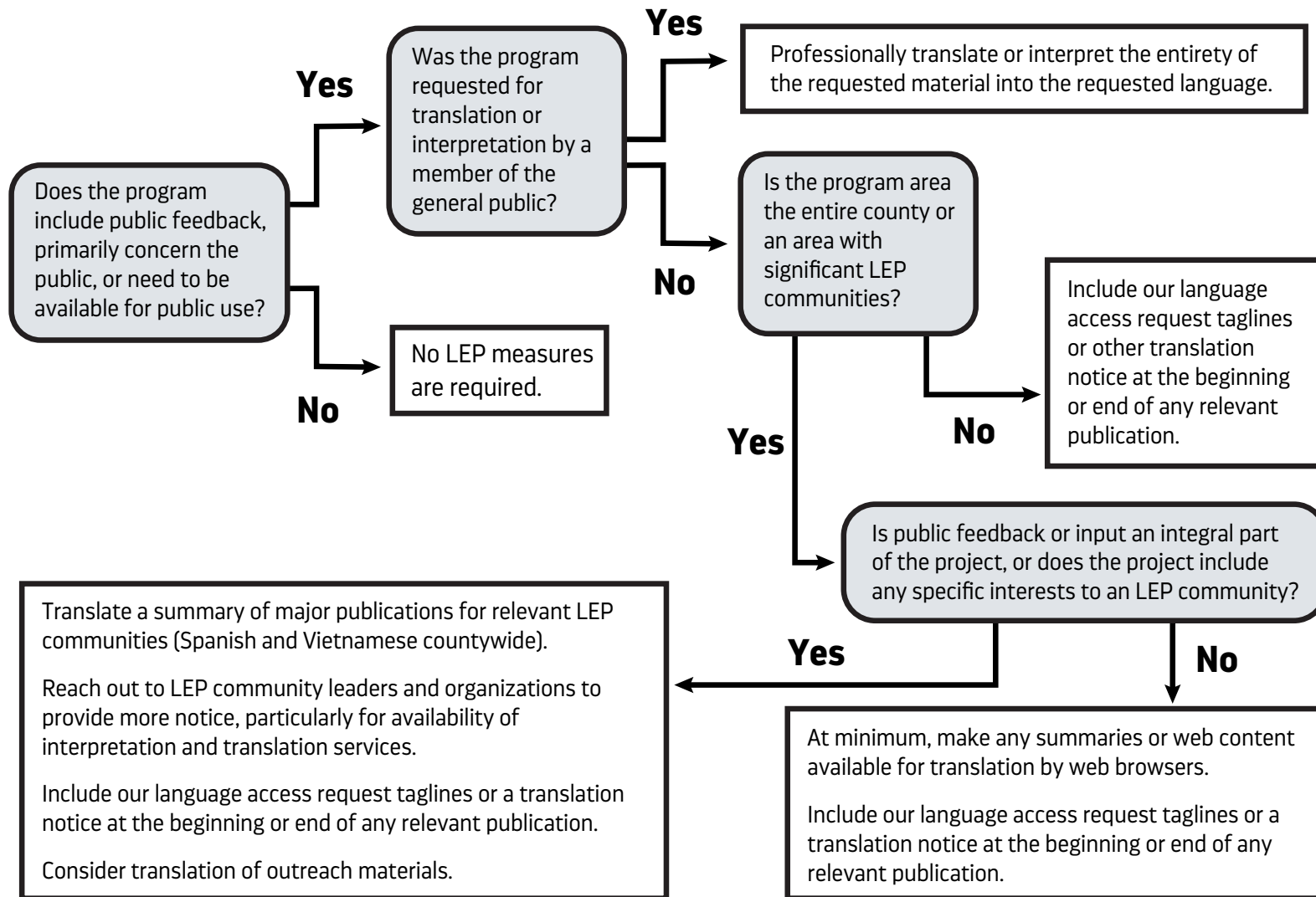
**Table 5 Translation Needs for Existing Documents**

| <i>Recommendation</i>                                      | <i>Plan or Program</i>  |
|--|---|
| Full translation   | Any requested document  |
| Summary translation  | places2040<br>connects2040<br>Active Transportation Plan  |
| Web translatable summary                                   | South Regional Plan<br>Cocalico Regional Plan<br>Northwest Regional Plan<br>Public Participation Plan<br>Limited English Proficiency Plan   |
| Revisit during next document update                        | Congestion Management Process plan<br>CMAQ Performance Plan<br>Safety Targets   |
| Provide public review and comment (required by regulation) | Complaint Forms<br>Notices of Rights (including Title VI statements)<br>Notices advising LEP persons of the availability of free language assistance<br>Letters or notices that may require a response from the beneficiary or client |

# Resources

## Program Requirements Flowchart

The flowchart below can be used by staff to determine if a program requires LEP measures.



## Language Access Request Fulfillment

1. A staff member receives a request for translated materials in person, writing, or as a voicemail.
2. As soon as possible, the staff member informs the head of Administrative Services of the request via e-mail. In the e-mail, staff should include the requested materials, language of the request, contact information of the sender, and the date the request was received. Purchasing staff should be copied on this e-mail.
3. The head of Administrative Services confirms the request. Purchasing staff submits a request to our contracted translation services provider within 5 business days of being notified of the request. We are currently contracted with:  
  
Fox Translation Services  
1152 Mae Street, Suite #122  
Hummelstown, PA 17036  
Phone: 844-369-8726 | Fax: 844-724-2092  
Email: [info@foxtranslation.com](mailto:info@foxtranslation.com)
4. After receiving the completed translation, purchasing staff will return the translated material to the staff member who received the initial request so they may return it to the requester. Upon receipt of the translated material, staff must return translated materials to the requester within 5 business days. Alternatively, staff may ask the head of Administrative Services to return the translated materials within 5 business days on their behalf.
5. For requested translations of documents with less than 5,000 words, requests must be delivered within 30 business days. Requested translations of documents with more than 5,000 words are expected to exceed the department's annual translation budget and should be responded to as soon as feasibly possible. The original requester may be asked if they would prefer a shorter summary of the material, or a segment of it, for quicker turnaround.

## Language Access Request Taglines

Language access request taglines are meant to guide readers through the process of requesting translation services. These statements are provided in a variety of languages and can be included in any plan or program.

### English Tagline Draft

Hello! We provide translation and interpretation services upon request. If you would like to read this document in a language other than English, or wish to contact us for language assistance, please leave a request by calling our inbox at **717-299-8333** and pressing “8,” or sending us an email at **example@lanastercountypa.gov**.

To request a document translation, include the name of the document that you need to have translated, the requested language for translation, and an email or street address where we can send the translated document. If you would like to receive confirmation of your request, please include your email address. We will provide you with a translated version of the requested document as soon as possible.

To request interpretation services, include the date and time of the meeting, the requested language for interpretation, and the meeting title. If you would like to receive confirmation of your request, please include your email address. We will provide interpretation services for any requests received at least five business days before the intended meeting date.

In the future, this tagline should be professionally translated and made available in the following languages:

- Spanish
- Vietnamese
- German
- French
- Korean
- Ukrainian
- Arabic
- Chinese
- Tagalog/Filipino

## Plain Language Guidance

### Readability Calculator

<https://www.webfx.com/tools/read-able/>

With this tool, you receive a score that determines how difficult it is to read the text you have submitted. Green scores are ideal when writing for the public, and yellow scores are appropriate for a professional audience.

### Difficult Word Finder

<https://datayze.com/difficult-word-finder>

After submitting a passage of text, this tool will highlight any rare, long, or unnecessary words. This can be useful when trying to achieve a higher score with the “Readability Calculator.”

*Note: After pasting your text, you will need to hit spacebar before you can select the “Analyze” button.*

### Content Writing Guide

<https://www.gov.uk/guidance/content-design/writing-for-gov-uk>

This website provides specific guidance on planning, writing, and managing content online.

### US Federal Plain Language Checklist

<https://www.plainlanguage.gov/resources/checklists/checklist/>

This website outlines the federal guidelines necessary to bring a document up to plain language standards.

## Sources

[York Area Metropolitan Planning Organization](#) (YAMPO). 2019.

YAMPO Limited English Proficiency (LEP) Plan. <https://www.ycpc.org/DocumentCenter/View/2343/YAMPO-Limited-English-Proficiency-LEP-Plan-PDF>

[Delaware Valley Regional Planning Commission](#) (DVRPC). 2019. DVRPC

Limited English Proficiency Plan. <https://www.dvrpc.org/Reports/TR19014.pdf>

[U.S. Department of Transportation](#) (USDOT). 2023. DOT’s LEP

Guidance. <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>



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