

Ukrainian

Я розмовляю українською мовою

Spanish

Yo hablo español

Cambodian

ខ្ញុំនិយាយជាភាសាខ្មែរ

Mandarin

我講國語

Russian

Я говорю по-русски

Vietnamese

Tôi nói tiếng Việt

Pioneer Valley Metropolitan Planning Organization

Language Access Plan



Prepared by:

Pioneer Valley Metropolitan Planning Organization

January 2023

A Limited English Proficiency (LEP) component of the PVMPO Title VI –Program

PIONEER VALLEY

METROPOLITAN PLANNING ORGANIZATION

FINAL DRAFT LANGUAGE ACCESS PLAN

to address the needs of limited English populations

Endorsed January 24, 2023

This document was prepared under contract with the Massachusetts Department of Transportation. This report was funded in part through grant[s] from the Federal Highway Administration [and Federal Transit Administration], U.S. Department of Transportation. The views and opinions of the authors [or agency] expressed herein do not necessarily state or reflect those of the U. S. Department of Transportation

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The Pioneer Valley Region MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 §§ 92a, 98, 98a, which prohibits making any distinction, discrimination, or restriction in admission to, or treatment in a place of public accommodation based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry. Likewise, the Pioneer Valley Region MPO complies with the Governor's Executive Order 526, section 4, which requires that all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status (including Vietnam-era veterans), or background.

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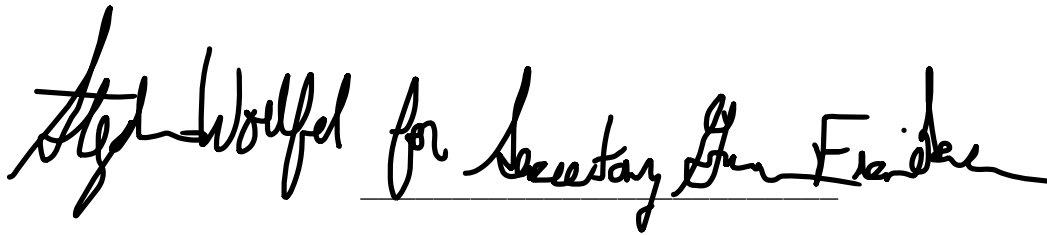
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***Pioneer Valley Metropolitan Planning Organization
Endorsement Sheet***

FY 2023 Language Access Plan

Through consensus at its January 24, 2023, posted meeting, the Pioneer Valley Metropolitan Planning Organization (PVMPO) voted unanimously on to endorse the *PVMPO FY 2023 TITLE VI Program* in compliance with FTA Circular C4702.1B

Handwritten signature of Stephen Wolfel for Secretary Dan Fendler.

Chair

DATED 1/24/23

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1. INTRODUCTION

The policy of the Pioneer Valley Planning Metropolitan Planning Organization (PVMPO) is to ensure that people with limited English proficiency (LEP) are neither discriminated against nor denied meaningful access to and participation in the programs, activities, and services provided by the PVMPO. This Language Assistance Plan (LAP) describes how PVMPO staff provide appropriate language assistance to people with LEP by assessing language needs, implementing language services that provide meaningful access to the PVMPO's transportation planning process, and publishing information regarding these services without placing undue burdens on the PVMPO's resources.

The PVMPO strives for open and inclusive public engagement. Every effort is made to ensure that planning tasks are conducted in a fair and transparent manner. This LAP is designed to meet federal requirements and also supports the PVMPO staff in the development and implementation of public engagement and communication efforts. These efforts are described in the PVMPO's Public Participation Plan.

This Language Access Plan (LAP) Plan has been developed by the Pioneer Valley Planning Commission (PVPC) in accordance with [policy guidance](#) issued by the U.S. Department of Transportation Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons, which is modeled after DOJ's guidance. As described in the guidance, DOT recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The plan also follows FTA guidance in the handbook issued by FTA; ["Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient \(LEP\) Persons: A Handbook for Public Transportation Providers."](#)

This plan is a living document; it is continually reviewed, updated and improved by PVPC staff to help better meet the needs of the residents of the Pioneer Valley Metropolitan Planning Organization (PVMPO) region.

This plan describes the strategic approach that PVPC is pursuing to achieve its program to better engage people who are Limited English Proficient (LEP) in metropolitan transportation planning activities. PVPC's goal is to ensure that LEP persons have meaningful access to the public involvement process for PVMPO activities. This LAP Plan clarifies PVMPO's responsibilities with respect to LEP requirements as a recipient of federal financial assistance from the U.S. Department of Transportation to people who are Limited English Proficient in accordance with:

- **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.,** and its implementing regulations, which state that no person shall be subject to discrimination on the basis of race, color, or national origin under any program or activity that receives federal assistance.

- **Executive Order 13166** “Improving Access to Services for Persons with Limited English Proficiency” of August 16, 2000, which directs that Federal agencies subject to the requirements of Title VI publish guidance for their recipients clarifying LEP obligations. Executive Order 13166 directs that all guidance documents be consistent with the compliance standards and framework detailed in the U.S. Department of Justice’s Policy Guidance “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency.” This guidance advises that 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, programs and operations of entities that receive funds from the federal government, which includes the PVMPO. As the PVMPO is a sub-recipient of federal funding from the Federal Transit Administration and the Federal Highway Administration, this LAP meets the requirements set forth by these agencies regarding the provision of language assistance in the PVMPO’s activities and programs.

These federal regulations and guidance define persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities.

This plan is being made available to people and organizations for which LEP may be a common consideration, including social service, non-profit, and law enforcement agencies. This plan is available in electronic PDF format on the PVPC website at www.pvpc.org. Paper copies of this LAP Plan will be provided to the community based organizations that have been consulted during the development of this plan, as well as the members of the Pioneer Valley Metropolitan Planning Organization (PVMPO), the Joint Transportation Committee of the PVMPO, the Massachusetts Department of Transportation, Federal Highway Administration, the Federal Transit Administration, the Pioneer Valley Transit Authority, and any other person or agency requesting a copy.

The Pioneer Valley Region MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 sections 92a, 98, 98a, which prohibits making any distinction, discrimination, or restriction in admission to, or treatment in a place of public accommodation based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry. Likewise, the Pioneer Valley Region MPO complies with the Governor's Executive Order 526, section 4, which requires that all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status (including Vietnam-era veterans), or background.

To fulfill these responsibilities, the Pioneer Valley Region PVMPO has developed a LAP based on guidance from the USDOT and Federal Transit Administration (FTA). This LAP is updated as

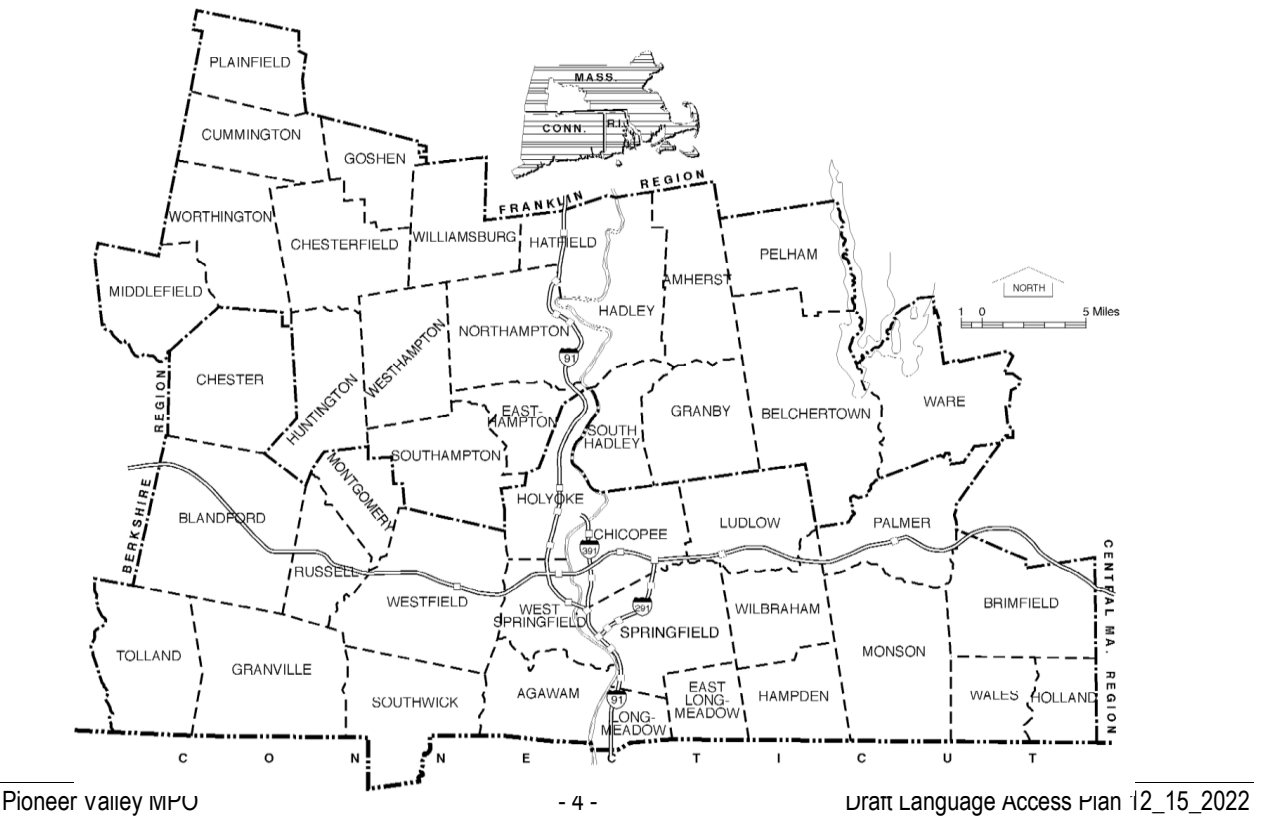
conditions warrant. As specified in FTA Circular 4702.1B, the LAP assesses the following four factors when determining language needs of people with LEP served by the PVMPO:

- Factor 1: The number and proportion of people with LEP eligible to be served by or likely to encounter a program, activity, or service of the recipient
- Factor 2: The frequency with which people with LEP come in contact with the program, activity, or service.
- Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives
- Factor 4: The resources available to the recipient, and their costs

Current Pioneer Valley MPO LEP Languages

Table 1 Current Pioneer Valley MPO LEP Languages

LAP Element	Description in Title VI Plan	Implementation Demonstrated Based on Review	Comments
Languages identified in four factor analysis	☑	☑	Reference Table 3
Vital documents to be translated	☑	☑	Reference Table 2
Language assistance training for staff	☑	☑	Staff are trained to respond to offer and respond to language requests
Periodic updating and monitoring of LAP	☑	☑	Languages updated with current data



2. PVMPO REGION LEP POPULATION ANALYSIS

This section presents an analysis of LEP residents of the PVMPO region. This analysis is modeled on the four-factor analysis of an individualized assessment described in the FTA guidance publication of April 13, 2007 entitled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.” Though the four-factor analysis is intended primarily for use by transit agencies, its application to the PVMPO is also helpful in assessing the needs of LEP persons in the metropolitan transportation planning process.

The PVMPO region includes communities with diverse ethnicities, including many people for whom English is not their native language. The representatives and residents of these communities who participate in the metropolitan planning organization (MPO) process are the most regular and significant channels through which PVPC has developed and maintains awareness of the concerns of LEP persons.

The following factors were considered to help gauge the level and extent of language assistance measures required to sufficiently ensure meaningful participation in the MPO process:

- Factor 1: Proportion, numbers and distribution of LEP persons in the PVMPO region
- Factor 2: Frequency of contact with LEP persons
- Factor 3: Nature and importance of metropolitan transportation planning to LEP persons
- Factor 4: Resources available to PVMPO and cost

1. 2.1 Factor 1: Proportion, Numbers and Distribution of LEP Persons

The U.S. Census Bureau reports a range of 4 classifications of how well people speak English. The classifications are ‘very well,’ ‘well,’ ‘not well,’ and ‘not at all.’ Consistent with federal guidance, the PVMPO LAP Plan considers people who are reported by the Census to speak English ‘not well’ or ‘not at all’ as Limited English Proficient persons.

2.1.1 Service Area Geographic Boundaries

The PVMPO region consists of the 43 Massachusetts municipalities listed below on Table 2.1 and displayed in Figure 1.1 on the previous page.

Table 2 Communities in the Pioneer Valley Region

Agawam	Easthampton	Ludlow	Southwick
Amherst	Goshen	Middlefield	Springfield
Belchertown	Granby	Monson	Tolland
Blandford	Granville	Montgomery	Wales
Brimfield	Hadley	Northampton	Ware
Chester	Hampden	Palmer	West Springfield
Chesterfield	Hatfield	Pelham	Westfield
Chicopee	Holland	Plainfield	Westhampton
Cummington	Holyoke	Russell	Wilbraham
East Longmeadow	Huntington	South Hadley	Williamsburg
	Longmeadow	Southampton	Worthington

2.1.2 Analysis of Language-related U.S. Census Data

In previous LAPs, PVMPO staff used American Community Survey (ACS) summary tables to identify the languages spoken by people with LEP living within the Pioneer Valley Region. However, starting with the 2016 ACS, the US Census Bureau changed how it reports non-English languages spoken at home in ACS summary tables. Coding for languages spoken at home was updated to reflect the changes in the number of people who speak different languages, resulting in the addition of some new languages and the reorganization of others (for example, French Creole became Haitian). In addition, in an effort to protect the privacy of the speakers of less widely spoken languages, at smaller geographies these languages have been collapsed and reported in aggregated form with others in the same language family (such as Other Indo-European Languages).

In the past, data were collected by municipality and aggregated to the PVMPO region to determine the number and percent of people with LEP; however, many languages are no longer reported for smaller municipalities. This means that PVMPO staff could not identify many of the individually spoken languages that were identified in the last (2017) LAP using ACS summary tables. To overcome these challenges, staff gathered language data from other sources to provide a fuller picture of language needs in the Pioneer Valley Region.

Table _ Speaks English Less than Very Well ACS (2016-21)

Language Spoken	# of People	% of Total
Total Population	664,580	
Spanish	34,815	5.24%
Other Indo-European languages	4,856	0.73%
Russian, Polish, or other Slavic languages	4,528	0.68%
Chinese	2,311	0.35%
Other Asian and Pacific Island languages	2,213	0.33%
Vietnamese	1,663	0.25%
Arabic	961	0.14%
French, Haitian, of Cajon	933	0.14%
Other and unspecified languages	630	0.09%
Korean	345	0.05%
Tagalog (incl. Filipino)	60	0.01%
German or other West Germanic	0	0.00%

Source: US ACS "2016-21" Language Spoken at Home and Ability to Speak English"

2.1.1 Public Use Microdata Sample (PUMS)

The Census Bureau's PUMS data use the same raw data gathered for the ACS but are provided as un-tabulated records of individual people or housing units to allow users to create custom tables that are not available in the summary tables created for standard ACS products. Because of the disaggregated nature of the data, they are subject to more stringent privacy controls.

These controls limit the size of the geographic areas for which data can be identified. The smallest area for which PUMS data are available is the Public Use Microdata Area (PUMA). PUMAs are PUMS-specific geographies that have a population of 100,000 to approximately 200,000 people. They are based on continuous aggregations of tracts or counties within a state. While some PUMAs within the Pioneer Valley Region align with the PVMPO's boundaries, a few do not. The PUMS data for the Pioneer Valley Region also includes all of Franklin County. However, PUMS data do provide the level of detail regarding languages spoken at home by people with LEP as required by FTA regulation and are therefore another option.

2017-2021 ACS 5-year Public Use Microdata Sample (PUMS) Data

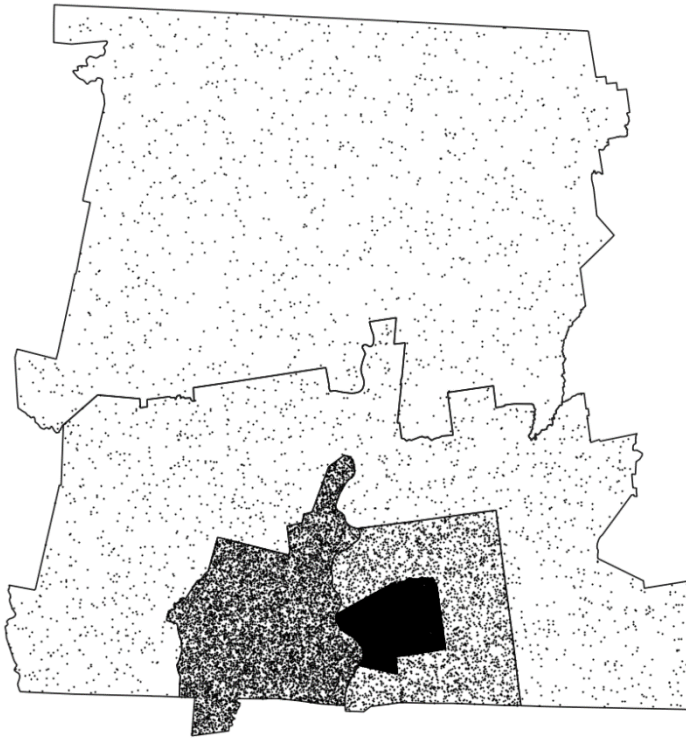
Although the population with LEP in the Pioneer Valley Region can be identified using standard ACS summary tables, to be consistent with how non-English languages spoken are identified, this LAP uses ACS PUMS data to report both types of information. The largest proportion of people with LEP speak Spanish (65%) followed by Russian and Chinese (either Mandarin or Cantonese) (5%), and Portuguese or Portuguese Creole (4%). The top seven languages account for eighty seven percent of LEP.

Figure 2.1-x LEP for People in PUMAs Containing PVMPO Communities

First Language Spoken by Person Who Speaks English Less than "Very Well"	Number of Persons	Percent of all People in MPO PUMAs	Percent of all LEP People
Spanish	33,954	5.1%	65%
Russian	2,586	0.4%	5%
Chinese	2,409	0.4%	5%
Portuguese	2,300	0.3%	4%
Polish	1,674	0.3%	3%
Nepali/Marathi/other Indic	1,497	0.2%	3%
Vietnamese	1,023	0.2%	2%
French	748	0.1%	1%
Arabic	654	0.1%	1%
Other Asian	577	0.1%	1%
Khmer	562	0.1%	1%
Amharic/Somali/other Afro-Asiatic	505	0.1%	1%
Ukrainian/other Slavic	491	0.1%	1%
Other Indo-European	486	0.1%	1%
Urdu	406	0.1%	1%
All Others (24 additional languages or language categories)	2,735	0.4%	5%
LEP Total in MPO PUMAs	52,607	7.9%	100%

Source: ACS 5-Year 2021 Estimates, Public Use Microdata Sample, "Ability to Speak English" & "Language Other Than English Spoken at Home"

Figure 2-4: Spanish Speaking Residents Who Speak English “Less Than Very Well”



1 • dot = 1 person. Locations placed randomly within municipal boundaries to illustrate relative density and do not represent residential locations of LEP persons. [Table B16001](#)

Figure 2-8: Russian-Speaking Residents Who Speak English “Less Than Very Well”

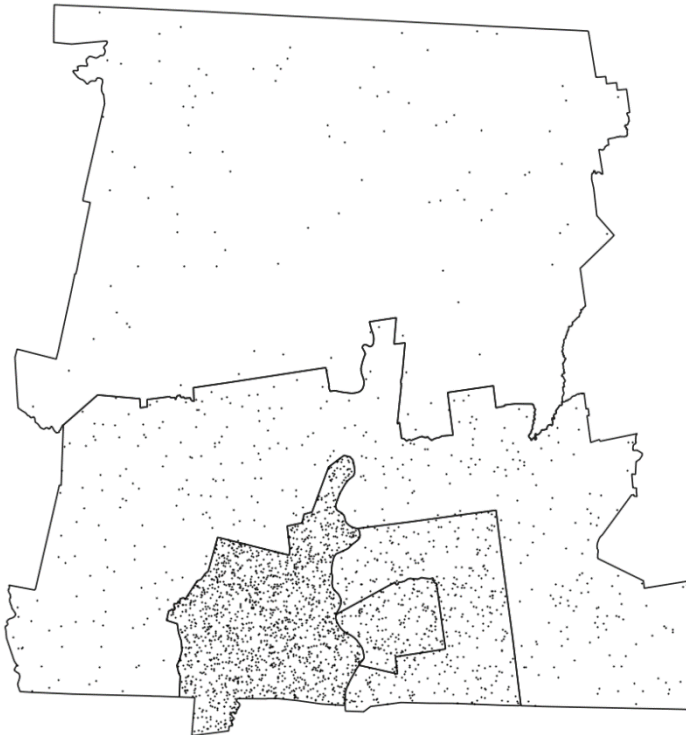


Figure 2-5: Chinese Speaking Residents Who Speak English “Less Than Very Well”

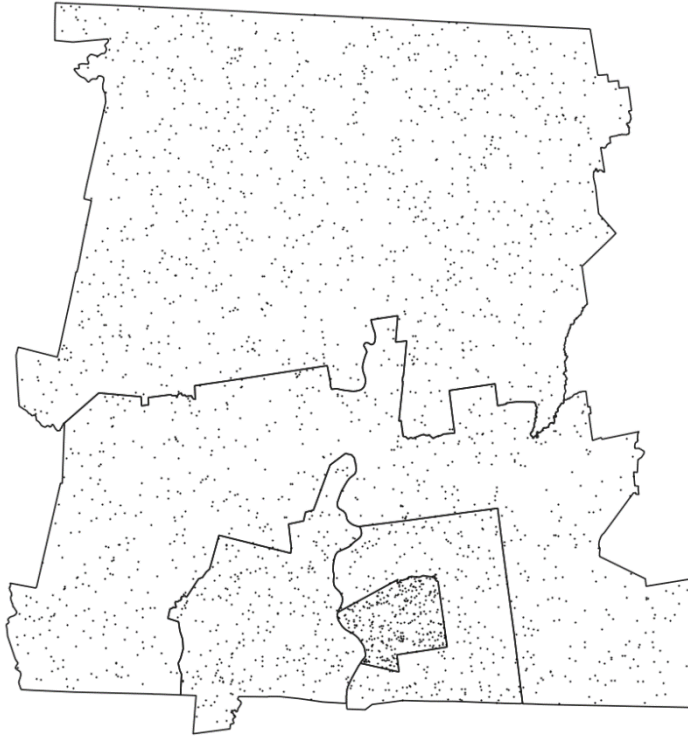


Figure 2-6: Portuguese -Speaking Residents Who Speak English “Less Than Very Well”

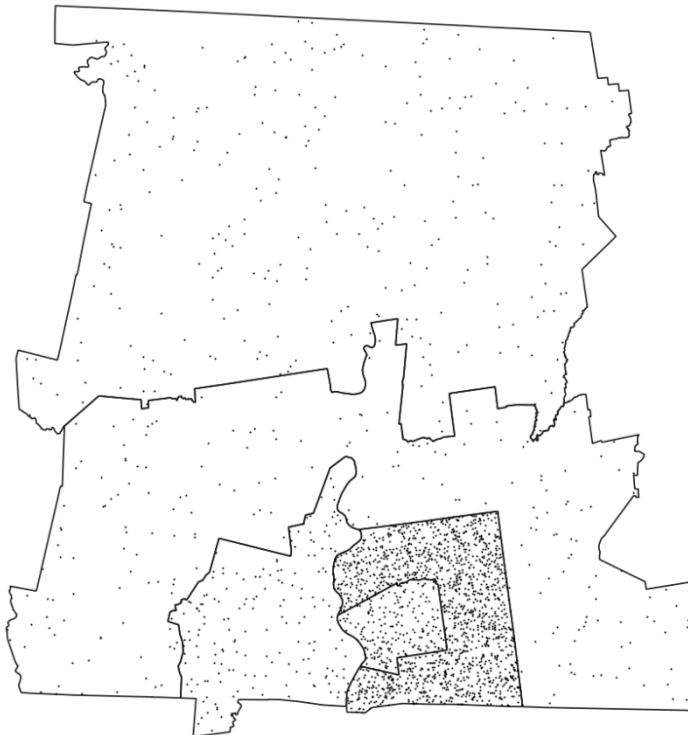


Figure 2-7: Polish Speaking Residents Who Speak English “Less Than Very Well”

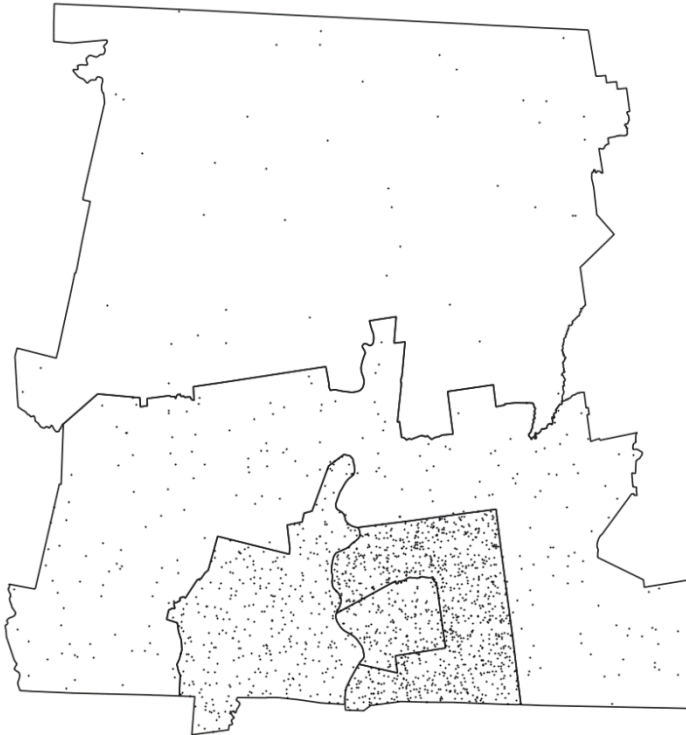


Figure 2-8: R Nepali/Marathi/other Indic Speaking Who Speak English “Less Than Very Well”

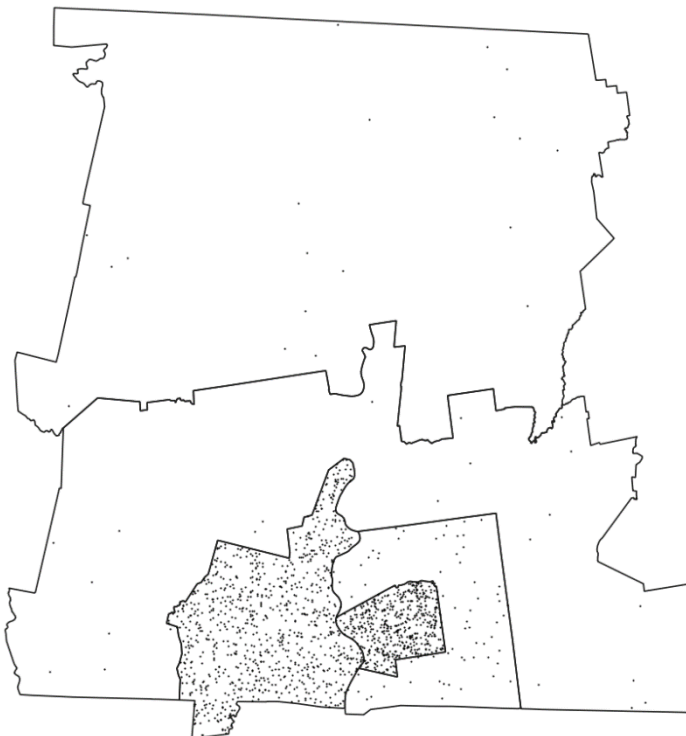
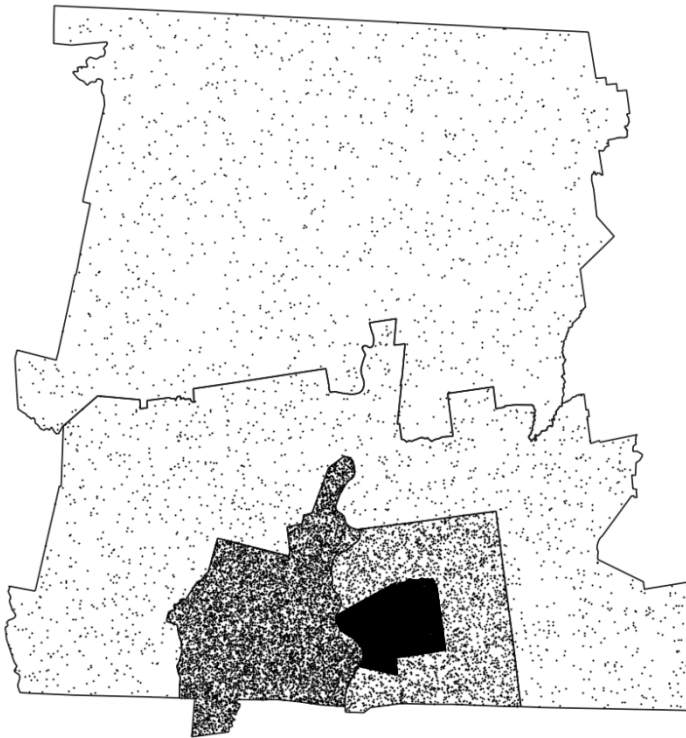


Figure 2-8: Vietnamese Speaking Residents Who Speak English “Less Than Very Well”



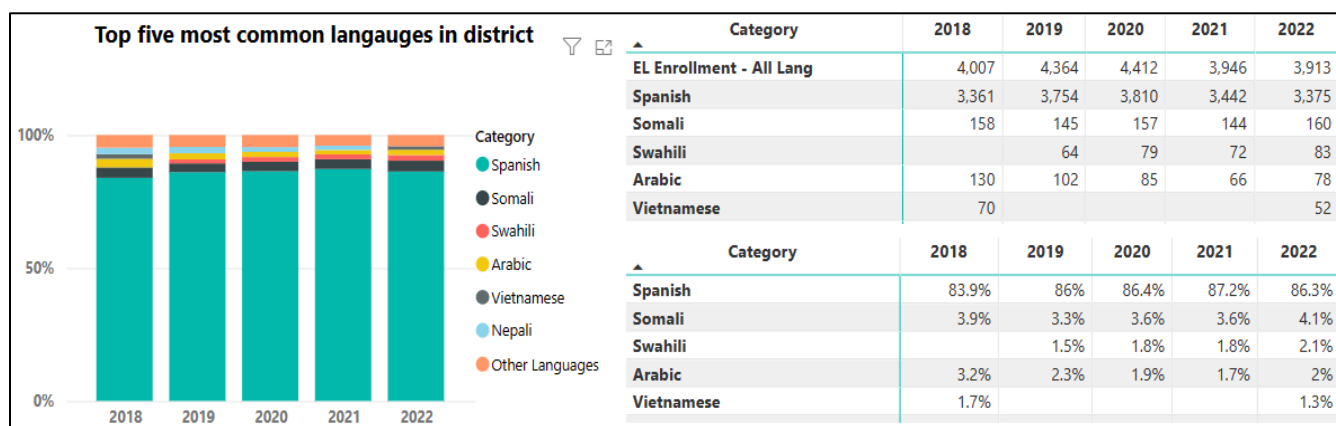
USDOT guidance specifies circumstances that signify strong evidence of a recipient’s compliance with their written translation obligations. If a recipient provides written translation of vital documents into languages that meet a certain threshold—called “Safe Harbor languages”—then their obligation is likely met. Safe Harbor languages are those non-English languages that are spoken by people with LEP (of those eligible to be served or likely to be affected or encountered by the recipient) who make up at least five percent of the population or 1,000 individuals, whichever is less. In the Pioneer Valley Region, Safe Harbor languages include speakers of the languages in Table x. There are five Safe Harbor languages in the Pioneer Valley Region. Because the cost of providing translations in all Safe Harbor languages is prohibitive, and as the top five languages make up the over three-quarters of all languages spoken by people with LEP in the region, the PVMPO focuses its written translation resources on those five languages: Spanish, other Indo-European languages, Russian, Polish, other Slavic, Chinese, and other Asian and Pacific languages.

The languages reported in this 2023 LAP and the PVMPO’s last plan in 2014 are quite different. A comparison of data from the PVMPO’s last LAP in 2014 and this LAP is difficult due to changes in how ACS language data are categorized and the privacy controls, as described previously. The geographies and coding used to aggregate the data differ from the MPO’s original LAP.

Other Language Data Sources

PVMPO staff looked at other sources of language data for the population. The Massachusetts Department of Education (MDOE) provides data on languages spoken at public schools and identifies numbers of student populations who are English language learners (ELL). Student languages often reflect household languages and may help to identify language needs, especially for local outreach efforts.

Table X Springfield School District _ Most Common Languages Spoken



2.1.3 Involvement of Community Organizations and Committees

The PVMPO is engaged with community based organizations that serve LEP persons in two general ways: 1) participating in meetings of organizations and agencies that deal with LEP issues; and 2) the public involvement process.

The staff of the PVMPO participates on an ongoing basis in the meetings and activities of the following community and municipal organizations that address in part the needs of LEP persons:

The PVMPO has historically made a concerted effort to involve the region's disabled, elderly, low-income and minority populations. The PVPC has actively collaborated with a wide range of organizations in partnerships to identify and address local and regional transportation, public health, and safety issues. The PVMPO engages a broad cross section of the community through these collaborations. Ongoing efforts such as the Plan for Progress, Regional Transportation Plan, Welfare to Work Program and Regional Comprehensive Land Use Plan have created relationships with open lines of communication.

The PVMPO makes a concerted effort to involve and address the needs of individuals or neighborhoods with Limited English Proficiency. The PVMPO routinely conducts outreach with language barriers in mind.

Following FHWA and FTA the guidance the PVMPO organizes the public participation to allow for consultation with organizations representing low income and minority populations and coordinated the transportation outreach into the meetings and schedules of these stakeholders. PVPC is actively involved in creating programs and projects that directly addressed local needs. The issues and concerns identified are incorporated into projects, programs and specific tasks through the Unified Planning Work Program, Transportation Improvement Program, and the Regional Transportation Plan. As part of ongoing public outreach efforts, the MPO collaborates on a Transportation Equity Outreach Resource list of contacts with community-based organizations and stakeholders that is updated annually and shared with MassDOT. PVPC routinely utilizes the MassDOT Engage Tool to identify outreach goals. Some of the community organizations included in the past include:

- Springfield Partners for Community Action
- MassBike
- STAVROS
- City of Springfield Office of Elder Affairs
- City of Springfield Office of Planning and Economic Development
- City of Springfield Parks Department
- Concerned Citizens of Mason Square
- Develop Springfield Corporation
- Enterprise Farm
- Gardening the Community
- HAP Housing
- Health New England
- Mason Square Health Task Force
- Mass in Motion
- Mass Mutual
- Massachusetts Department of Public Health Western Region
- New North Citizens Council
- Partners for a Healthier Community
- Pioneer Valley Asthma Coalition
- Pioneer Valley Planning Commission
- Pioneer Valley Riverfront Club
- Public Health Institute of Western Massachusetts
- Springfield Housing Authority
- Springfield Partners for Community Action
- Springfield Vietnamese American Civic Association, Inc.
- University of Massachusetts Amherst
- Vietnamese Health Project/ Mercy Medical Center

Ongoing specific engagement with community organizations and groups also includes the following:

PVPC participates in the Springfield Built Environment Group. With a significant population at risk for heart disease and stroke, Springfield faces significant health challenges. The Springfield Built Environment Group helped bring attention to the Springfield Riverwalk and Bikeway with

a new informational web site and assisted in updated the Springfield Complete Streets Prioritization Plan. This effort supports MassDOT mode shift goals of increasing biking, walking and transit use and addresses specific strategies for sustainable transportation in addition to other associated goals (better air quality, healthier communities, etc.).

PVMPO staff also participates regularly in meetings and activities of municipal and volunteer committees in PVMPO member communities, including those of the City of Northampton Public Transportation Committee. PVMPO staff also conducts outreach to the Town Amherst Public Transportation Committee. Both committees address issues of concern to LEP residents of the region.

PVMPO continues to work with other transportation agencies, including the Pioneer Valley Transit Authority, Massachusetts Highway Department, Massachusetts Office of Community and Economic Development and others to identify other community based organizations not traditionally involved in service of LEP persons. Table 1 (next page) lists the organizations, meeting dates with PVMPO and transportation concerns identified during outreach performed for the most recent update of the PVMPO Title VI plan to MassDOT.

Table 1

Recent Outreach Activities

In 2021, PVMPO staff received an AARP grant to identify barriers to participation in the region’s bike share “ValleyBike.” PVPC used this opportunity to identify underrepresented populations within ValleyBike Share and launched a series of bike share “demo days” at an inner-city fitness club (LA Fitness) in Springfield and at farmer’s markets in Springfield and Holyoke. The outstanding success of reaching such a diverse and engaging public would guide larger outreach for the RPT. With over 116,939 trips in 2022, ValleyBike Share has been a tremendous success. PVPC coordinated with partners to assure that this success equitable. The ValleyBike Equity Program secured subsidized memberships for lower income members of the community through. Qualified residents who are currently receiving S.N.A.P. Benefits or Section 8 Housing, or MassHealth Standard are eligible for the ValleyBike Access Pass. ValleyBike provides Access Pass users an annual membership for \$10.00 per year, payable with a debit card, credit card, or money order. The pass will allow users unlimited 1-hour rides.

PVPC staff convenes a coalition of stakeholders for the Springfield Built Environment Committee. The Springfield Built Environment committee brings together City of Springfield staff members who work on the Built Environment to assure regular communication and collaboration. The group, which meets monthly, first started meeting in 2003. Members include representatives from the following city departments: Public Works, Planning & Economic Development, Parks, Buildings & Recreation Management, Health & Human Services, Elder Affairs, Police and Springfield Public Schools. In addition, representatives from other organizations participate, including PVPC staff, Pioneer Valley Transit Authority (PVRTA), Way Finders, the MassDOT Safe Routes to School Initiative, and the Public Health Institute of Western Massachusetts (PHIWM). PVPC and PVRTA are quasi-governmental organizations that serve the city. PHIWM is a nonprofit organization that work in Springfield to advance a healthy built environment. The Mass DOT Safe Routes to School Initiative advances safe walking and bicycling to school.

Way Finders is an active partner in community building & public engagement, providing the training, tools, and resources to help residents grow into skilled, capable leaders. Wayfinders has trained residents of Springfield’s Mason Square on infrastructure advocacy—which brought improvements in street lighting, an improved roundabout at a dangerous intersection and introduced separated bike facilities to neighborhoods. Through the work of Wayfinders, Springfield residents have learned about the connections between climate change, health equity, digital equity, and systemic racism. And from organizing cleanups in Holyoke’s Library Commons neighborhood to efforts to help close the digital divide—the gap between those who do and do not have ready access to technology. PVPC actively collaborate with Wayfinders on capacity building, around issues related to the built environment, safe street lighting, Bay State Bike Week demonstration projects, and safe routes to school.

[WalkBike Springfield](#): Since the creation of the first bike plan for the City of Springfield in 2014, PVPC staff have been an active partner with the advocacy group WalkBike Springfield. In collaboration with the Caring Health Center, Concerned Citizens of Mason Square, Develop Springfield, Mason Square Health Task Force, New North Citizens Council, Pioneer Valley Riverfront Club, Partners for a Healthier Community, Gardening the Community, Vietnamese American Civic Association the WalkBike developed a plan that became a catalyst for transforming the streets of Springfield. Today, WalkBike Springfield continues to be a leader offering education through a bicycle curriculum, outreach to Neighborhood Councils, creation of a Good Neighbor Handbook, improving pedestrian crossings, introducing a 25 MPH Speed Limit Campaign, securing designation as an Age Friendly City, updating Complete Streets Plans and advocacy for a skate park. PVPC is proud to have partnered with WalkBike Springfield on any number of initiatives. Most recently our staff attended design hear in on the Highland Division Trial in East Springfield.

The Pioneer Valley Planning Commission (PVPC) is working to advance racial equity and access to opportunity. In 2019 we created a Racial Justice Equity Diversity, and Inclusion Committee (DEI) staffed by members of our team to examine our potential biases as a workplace and as a public agency serving diverse communities across the forty-three cities and towns of Hampden and Hampshire Counties. The Committee prepared a DEI statement that was adopted by our Commission in 2021.

In 2021, we partnered with the Healing Racism Institute of the Pioneer Valley to train **all** staff as part of our ongoing work leading to the adoption of actions to help catalyze change internally, as well as bringing racial justice and economic equality to the forefront of our projects.

In 2020 PVPC joined the Government Alliance on Race and Equity (GARE) and collaborated with the Western Massachusetts Health Equity Network and the Massachusetts Public Health Association to organize a webinar for over 200 attendees explaining the Government Alliance on Race and Equity (GARE) and introducing the tool: Racial Equity Impact Assessments. The goal of this work is to advance integration of racial equity tools and resources to our forty-three local member municipal governments. We are happy to share the presentations used in the webinar and the research on the status of racial equity impact assessments completed as part of this work. We are advancing integration of a Race and Health Equity Impact Assessment in Springfield as part of the LiveWell Springfield Climate Justice work funded by the Kresge Foundation's Climate Change Health and Equity (CCHE) initiative.

In 2020 PVPC received a CARES grant from the Economic Development Administration for the purpose of economic recovery from the COVID-19 pandemic. The agency has completed research on unemployment and other economic data by race to demonstrate the disparate impacts of the economic shutdown on minority populations in the region. PVPC is also conducting outreach to diverse communities and constituents to determine needs and potential solutions, as part of our commitment to a long-term inclusive economy strategy.

In response to the COVID-19 pandemic recession that took its toll on the regional economy--hitting our BIPOC communities particularly hard--we created the Pioneer Valley COVID Recovery Dashboard and established a blog to enable us to share deeper analysis about data trends affecting the region. COVID hit the regional economy hard, both exacerbating and highlighting longstanding disparities in well-being rooted in race and ethnicity.

In 2021 PVPC applied for and was chosen as one of only six agencies nationwide to participate in an EDA and National Association of Development Organizations (NADO)-sponsored program to develop inclusive economic strategies. The initiative will involve research on regional economic clusters and more in-depth community engagement.

Pioneer Valley Planning Commission received \$490,300 to implement an e-bike ownership pilot program by leveraging an existing successful e-bike share program in the Pioneer Valley Region. In close collaboration with community-based organizations, the Commission will serve economically and structurally disadvantaged Environmental Justice populations in Springfield, Chicopee, Holyoke, West Springfield, Northampton, Amherst, Easthampton, and South Hadley. The goal is to distribute 50 e-bikes in Spring 2023. Community based organizations include [Ascentria Care Alliance](#), [Springfield Food Policy Council](#), [Gardening the Community](#), [One Holyoke](#), [Holyoke YMCA](#), [Valley Opportunity Council](#), [Community Action Pioneer Valley](#).

Summary of RTP Outreach Events

In the development of the 2024 RTP, MPO staff made a concerted to engage the public through the distribution of meeting notices and posting in local news media. (A detailed summary of similar outreach from the previous 2020 RTP was documented [Chapter 3 of the 2020 RTP](#)). A series of focus groups convened early in the development of the 2024 RTP to assist in the development of the draft document. Focus groups consisted of a core group of representatives invited to participate in a discussion on the development of the vision statement, goals, needs, and strategies included in the RTP. Comments received as part of the focus groups assisted in the development of the problem statements included in the RTP.

Four focus groups for the 2024 RTP update held in 2022:

- Wednesday November 9, 2022 – Bicycle and Pedestrian

- Wednesday November 9, 2022– Infrastructure
- Thursday December 1, 2022 – Transit
- Wednesday December 7, 2022 – Sustainability
- Thursday December 8, 2022 – PVPC Commissioners

In-person Public Engagement

In the development of the 2024 RTP, a concerted effort is made to engage the public in person. Early in the development of the 2024 RTP, PVPC staff organized outreach at local Farmer's Markets. The long-range plan identifies the region's goals, strategies, and projects to both enhance and maintain our transportation system. Public comments received will help to guide regional planning activities such as East-West Rail, the regional bicycle network, public transit, air quality, sustainability, and equitable transportation over the next 20 years. The Farmer's market selected were transit accessible and in environmental justice communities. PVPC staff used the "[MassDOT Engage Tool](#)" to identify language needs and prepare outreach materials. In addition to offering language specific materials, PVPC staff used "I speak" card to assist in identifying language preferences. Farmers markets that participate in the Healthy Incentives Program accept SNAP (food stamps) and clients receive \$1 back for each dollar spent on eligible fruits and vegetables at the farmer's market. These incentives contributed to a more diverse public engagement.

In-person Farmer's Markets:

- September 27, 2022 - Farmer's Market at Forest Park, Springfield, MA 12:30 PM - 6:00 PM
- October 2, 2022 - Easthampton Farmer's Market 50 Payson Ave, Easthampton, MA 10:00 AM - 2:00 PM
- October 4, 2022 - Northampton Farmer's Market (Behind Thorne's Marketplace) Northampton, MA 1:30 PM - 6:30 PM
- October 6, 2022 - Westfield Farmer's Market 36 Court Street Westfield, MA 12:00 PM - 5:00 PM
- October 15, 2022 - Holyoke Farmer's Market Race Street (between Dwight Street and Appleton Street) Holyoke, MA 01040 10:30 AM - 2 PM

Other In-person Outreach Events

- Saturday November 5, 2022 - Gujarati Association of Western Massachusetts

Diwali Party

- Thursday November 10, 2022 – Pope Francis High School Career Day

Language “I Speak” cards used during outreach events



2.2 Factor 2: Frequency of Contact with LEP Persons

PVMPO members and staff are in contact with organizations and individuals representing the concerns of LEP persons on a daily basis. The contacts include:

- Planning support to the PVRTA, which serves a large number of LEP persons daily.
- Coordination of public involvement and community outreach activities for the PVMPO and PVRTA, such as bus rider forums, para-transit rider meetings, public hearings and meetings with community groups.
- Coordination and cooperation with community based organizations
- Coordination with social service organizations.

2.3 Factor 3: Nature and Importance of PVMPO Transportation Planning and Service to LEP Community

PVMPO is committed to making the metropolitan transportation planning process as accessible as possible to all people who live within the region. Input from all stakeholders is critical to the transportation planning process, so the PVMPO invests considerable effort to conduct inclusive public engagement. Staff helps the public to understand the transportation planning process and provides ongoing opportunities for the public to shape transportation in the Pioneer Valley Region. The specific public engagement activities carried out by staff are described in the PVMPO's PPP.

2.4 Factor 4: Resources Available

The PVMPO programs the transportation projects that utilize federal and state sources of operating assistance for transit, as well as and capital assistance for transportation and transit projects. Support for LEP outreach and related services are integrated with the planning and development of these projects.

Based on the number past requests and and type of meetings for which written materials would be translated, the PVMPO has budgeted sufficient funds to provide translation for the most widely spoken LEP languages. The budget also includes sufficient funds for public outreach or to accommodate special requests. Since 2020 the PVMPO has not received any such requests.

The PVMPO's policy is to provide translation and interpreter services when they are requested at PVMPO-sponsored meetings. Although the PVMPO has advertised the availability of interpreters, none have been requested to date. While the PVMPO has been able to provide language translation services with existing resources, the region continues to see an influx of new language populations. Therefore, the PVMPO will continue to monitor the need for translation and interpretation services based on factors one through three of the four-factor Analysis and the number of requests received. The PVMPO will also determine whether the current policy should be adjusted because of resource constraints.

Going forward, the PVMPO will continue to identify LEP concerns and seek appropriate additional funding and strategies for integration with programmed transportation projects in the region that may be available and appropriate for LEP programs and services.

4.0 IMPLEMENTATION PLAN FOR LANGUAGE ASSISTANCE

This section describes PVMPO's current and future plans for providing language assistance to LEP persons in the region.

4.1 *Identifying LEP Persons Who Need Language Assistance*

PVMPO identifies LEP persons who need language assistance through the following activities and services:

- Coordination with municipal, regional and state agencies engaged in transportation planning processes.
- Outreach to community based organizations and municipal agencies to ask their assistance in identifying LEP persons who may need language assistance.
- Outreach to social service agencies in the region.
- Planning coordination and public involvement services and activities with the Pioneer Valley Transit Authority.
- Inclusion of instructions on how to request language translation of key written documents on public meeting notices.
- Asking persons attending public hearings if Spanish language translation and/or signing interpreter services are desired or needed (services are always available).
- Demographic assessment of census data to ascertain likely geographic location of potential LEP customers.

4.2 **Providing Language Assistance**

This section describes the current and future services that the PVMPO provides for enhancing the access of its system to LEP persons.

Information regarding PVMPO transportation planning processes is made available through multiple means, including translated public meeting notices and providing a bilingual staff whenever possible. PVMPO's future programs and services to enhance accessibility of transit services to LEP persons include:

- Partnerships with PVTa and community organizations to develop a list of language translation volunteers who are available for public meetings. This option could be used where advanced notice is provided that translator services are needed. This option may also help increase the number of languages for which translation services are available.
- Development of written translation and oral interpreter service providers database. This would improve the speed and convenience with which written documents can be translated for the public, and reduce the need to have public requests for them.
- Ensuring that PVMPO members are aware of the USDOT LEP guidance and support their LEP planning activities, as appropriate.

- Regular updates to this LAP Plan, as needed by new events, such as the release of language-related demographic data from the 2010 decennial census and/or indications of increases in LEP population.
- Identification of community based organizations that are not being contacted through existing outreach.

4.3 SAFE HARBOR STIPULATION FOR WRITTEN TRANSLATIONS

Federal law provides a “safe harbor” stipulation so that recipients and sub-recipients of federal funds can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A safe harbor means that if a recipient or sub-recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient's or sub-recipient’s written-translation obligations under Title VI.

The failure to provide written translations does not mean there is noncompliance, but rather provides a guide for recipients and sub-recipients that would like greater certainty of compliance than can be provided by a fact-intensive analysis.

For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not required. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, could be acceptable or preferable under such circumstances.

Strong evidence of compliance with a recipient’s or sub-recipient’s written-translation obligations under safe harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

This safe harbor provision applies to the translation of written documents only. It does not affect the Title VI requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable.

In the PVMPO region all eligible LEP language groups exceed the “1,000 or greater” population threshold for which written translations of vital documents can be provided (see table). Using the Safe Harbor standard, PVPC is committed to provide written translations of all key documents to residents of our 43 communities.

Table _ Pioneer Valley MPO Safe Harbor Vital Document Translations

Pioneer Valley MPO Vital Documents Translation Schedule	Spanish	Portuguese	Creole	Russian	Polish	Chinese	Vietnamese	French	Other Slavic

Notice to Beneficiaries (Notice of Civil Rights)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Title VI Complaint Procedures	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Complaint Form	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Consent Form	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Statement advising of the availability of free language assistance services for LEP individuals in materials routinely disseminated to the public	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Notices of proposed public hearings regarding proposed transportation plans and programs.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*TBD = Translations on a case by case basis or to the extent that resources allow

4.4 Providing Notice to LEP Persons

USDOT LEP guidance states: “Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons can understand.”

PVMPO provides this notification through the following:

1. Meeting notices in print and on the PVMPO website that include instructions on how to request language assistance (with advance notice).
2. The statement in outreach documents that language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individual of the recipient’s services, including the availability of language assistance services.
4. Including notices in local newspapers in languages other than English. (Local Spanish news media is traditionally used by the MPO)

4.5 Other Efforts to Disseminate Information and Engage Populations

The MPO utilizes a variety of methods of communicating with the public. These methods include messaging on Constant Contact, social media (Twitter, Facebook, and YouTube), the PVMPO’s website, through board meetings and committee meetings, virtual meetings, stakeholder outreach, and in person public events. The dissemination of Title VI information is associated with this outreach and other MPO activities through the action of physically posting notice, or referencing Title IV with meeting notices, documents, agendas, and formal actions items at JTC and MPO meetings. The MPO’s website is the main repository for documentation of the MPO’s Title VI Program and related information. Vital documents are translated into Safe Harbor Languages and the MPO is working to post documents in both PDF and HTML to improve accessibility. The PVMPO web site was revised specifically to make Title VI resources and documentation more visible and more accessible. The MPO staff make a concerted effort to respond to requests for alternative document format including large print and braille. Participants in the planning process can request materials in accessible formats by email, telephone, or US mail. In 2022 the MPO website was revised to enable Google Translate that allows for translation into dozens of languages. All MPO public documents contain the full or abbreviated notice of nondiscrimination, notification that translations are available upon request, and that accessible accommodations can be made available upon request. In-person meeting locations for the MPO have wall mounted board with the notice of nondiscrimination (in seven languages). The MPO maintains several email distribution lists including Joint Transportation Committee, and a Transportation Equity contact list comprised of community-

based organizations and nonprofits including organizations and individuals representing traditionally underserved populations. These email lists are used to keep the public informed of opportunities to participate in the planning process. Translations for vital documents are available in accordance with the MPO's Language Access Plan and these translated documents include translated versions of the notice of nondiscrimination and the ability to request translated and accessible versions of documents.

3.1 Oral Language Assistance

3.1.1 In-Person Public Engagement

The PVMPO provides interpreter services upon request with two weeks advance notice. Notices for all meetings state this information and how to request an interpreter. The number of people with LEP in the Pioneer Valley Region, along with their infrequent interaction with the PVMPO, has meant that the PVMPO is rarely asked to provide oral language services. This, however, does not necessarily mean that there is no need for translation among the region's population or that this need will not be made known in the future.

3.1.2 Virtual Public Engagement

The need to conduct public engagement virtually during the COVID-19 pandemic has led staff to expand opportunities to engage with the PVMPO online. All PVMPO meetings and PVMPO-hosted events are held via the Zoom online meeting platform. Staff make every effort to provide services equivalent to those offered at in-person meetings. Attendees may request an interpreter at least two weeks ahead of time.

3.2 Written Language Assistance

3.2.1 Vital Documents

The PVMPO provides written translations of vital documents, as required by federal regulations. Vital documents are those that contain information that is critical for obtaining PVMPO services, or that are required by law. The PVMPO has determined that documents and materials are considered vital if they enable the public to understand and participate in the regional transportation planning process.

The Notice of Nondiscrimination Rights and Protections was developed for use by all Massachusetts PVMPOs by the Massachusetts Department of Transportation (MassDOT). MassDOT also provided translations of the notice in seven languages: Spanish, Chinese (traditional and simplified), Portuguese, Haitian, Russian, and Vietnamese. The PVMPO's complaint form and procedures are translated into XX languages in addition to English.

The PVMPO's approach may not meet all language needs. Based on analyses of MDOE language data, whereas many LEP speakers of the five most common Safe Harbor languages are concentrated in urban areas, especially in and around Holyoke and Springfield, speakers of the other languages tend to be more geographically dispersed. With that in mind, the PVMPO's policy is to identify language needs for areas in which it conducts outreach—for example, public meetings for the RTP—and provide written translations in other languages as necessary. To aid in this approach, staff identify the languages spoken in locations where they hold public events through collaboration with community partners.

3.2.2 PVMPO Website

To accommodate website translation needs, the PVMPO website hosts Google Translate, a browser-based tool that translates website content into more than one hundred languages, including all Safe Harbor languages within the Pioneer Valley Region. PVMPO documents are posted on the website as PDF files. A growing number of documents are being made available in HTML format. HTML format documents allows them to be read aloud by a screen reader and enables the use of Google Translate for all documents on the website. In addition, people with LEP may also set their internet browser language to one of their choosing.

3.2.3 Emails, Surveys, and Social Media

Email is the main method by which PVMPO staff communicate with the public. Any member of the public may sign up for any of several PVMPO email lists. All of these emails can be translated by clicking the appropriate language at the top of the email. Translations are performed by Google Translate and are available in dozens of languages, including all Safe Harbor languages.

PVMPO surveys are nearly always conducted online because of the frequency with which staff produce surveys, their affordability, and their wide reach. Surveys also allow staff to provide translations at a cost to the PVMPO.

4.6 Monitoring and Updating This LAP Plan

Meaningful language access requires more than securing translation and interpretation services. Language access strategies must empower MPO staff to sustain the public processes, to get to know the communities impacted, and to seek, preserve, and share institutional knowledge. The PVMPO will continue to monitor and update this LAP Plan in order to achieve these goals. Related activities in the future will likely include:

- Continued use of the LEP Checklist (below)
- Close collaboration with ODCR and expanded use of the MassDOT Engage and other innovative tools for public engagement.
- Continued training on racial cultural bias and training on language resources.
- Improve language translation tools on the the MPO website.
- Establishing and implementing a process to obtain feedback from LEP persons, directly, as well as community members and agencies.
- Conducting internal monitoring and random spot checks of LEP services.
- Refining and improving the LAP Plan described above consistent with feedback received.
- Considering new language assistance needs when expanding service.
- Regularly updating the plan (annual basis) or when significant new language-related demographic data becomes available.

LANGUAGE ASSISTANCE MEASURES

Include the types of language services currently available, and proposed for the future.

How is your staff made aware of the services?

How does your staff respond to LEP callers?

How does your staff respond to written communications from LEP persons?

How does your staff respond to LEP persons who have face to face contact with your staff?

STAFF TRAINING

How is staff trained/informed of the language assistance measures offered by your organization?

How often is LEP training provided (i.e., annually, biannually, at hire with annual refreshers, etc.)?

Will staff be trained as new language assistance measures are implemented?

OUTREACH/NOTIFICATION

How is the public aware of the ability to request free language assistance?

Will the availability of language assistance appear on brochures, booklets, newsletters, etc.?

Will notice of language assistance be provided at registration/intake?

Will notice of language assistance be provided to CBOs and FBOs?

MONITORING & UPDATING

How will the LAP be monitored for effectiveness and relevance?

How often will the LAP be updated?

How often will your organization look at census/ACS data to identify any changes in LEP populations in your service area?

IDENTIFICATION OF VITAL DOCUMENTS

Your LAP must include a listing of “vital documents”. Vital Documents are those considered necessary to having access to your programs, benefits, services, and activities. FTA identifies the Title VI Notice to the Public, and Title VI Complaint Form as vital documents.

Vital documents should be translated in their entirety for any language groups that reach the LEP threshold of 5%, and at least partially, into any languages that reach the safe harbor threshold of 1000 persons. A translation schedule should be included in your LAP.