

# LANGUAGE ASSISTANCE PLAN

Accommodating Individuals with Limited English Proficiency (LEP) in All Programs and Activities

May 2024



Metropolitan Washington  
**Council of Governments**

**LANGUAGE ASSISTANCE PLAN: ACCOMMODATING INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP) IN ALL PROGRAMS AND ACTIVITIES**

May 31, 2024

**ABOUT COG**

The Metropolitan Washington Council of Governments (COG) is an independent, nonprofit association that brings area leaders together to address major regional issues in the District of Columbia, suburban Maryland, and Northern Virginia. COG's membership is comprised of 300 elected officials from 24 local governments, the Maryland and Virginia state legislatures, and U.S. Congress.

**CREDITS**

Editors: Sergio Ritacco

**ACCOMMODATIONS POLICY**

Alternative formats of this document are available upon request. Visit [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) or call (202) 962-3300 or (202) 962-3213 (TDD).

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The Metropolitan Washington Council of Governments (COG) operates its programs without regard to race, color, and national origin and fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit [www.mwcog.org/nondiscrimination](http://www.mwcog.org/nondiscrimination) or call (202) 962-3300.

El Consejo de Gobiernos del Área Metropolitana de Washington (COG) opera sus programas sin tener en cuenta la raza, el color, y el origen nacional y cumple con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados que prohíben la discriminación en todos los programas y actividades. Para más información, presentar una queja relacionada con el Título VI, u obtener información en otro idioma, visite [www.mwcog.org/nondiscrimination](http://www.mwcog.org/nondiscrimination) o llame al (202) 962-3300.

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# EXECUTIVE SUMMARY

The Metropolitan Washington Council of Governments (COG) is committed to ensuring meaningful access to its programs and activities by persons who are limited English proficient (LEP). A “four-factor” analysis, developed by the federal government, is used to help determine how to ensure reasonable and meaningful access to COG activities, including:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

For the results of the four-factor analysis performed by COG, refer to Section II, which discusses and describes the LEP populations which are served directly by some COG programs, particularly the Transportation Planning Board (TPB). Most of the LEP persons who come in contact with COG and its programs do so at Board or Committee meetings which are open to the public or as applicants for employment with COG. COG has provided for Language Assistance services. Please refer to the adopted COG Annual Budget for the specified amounts allocated to Language Assistance (budget reflects the requirements made of COG for such services).

COG’s Accommodations Policy states that translation services are available upon request for meetings that are open to the public, for certain documents, and publications. Refer to COG’s Accommodations Policy for procedure and timeframes for submitting such requests. COG’s Accommodations Policy is translated into Spanish, French, Korean, Chinese (Mandarin), Vietnamese, and Amharic, and posted on the COG website. Further, the COG website can be translated into 130 different languages.

In addition to posting COG’s Accommodations Policy online and including a notice about accommodations on the committee webpages, COG includes the following language in its significant meeting announcements and agendas to notify the LEP populations of the availability of language assistance:

Reasonable accommodations are provided upon request, including alternative formats of meeting materials. For more information, visit [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) or call (202) 962-3300 or (202) 962-3213 (TDD).

In major COG publications the following text is included to notify the LEP populations of the availability of alternative formats of the document:

Alternative formats of this document are available upon request. Visit [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) or call (202) 962-3300 or (202) 962-3213 (TDD).

COG developed its Accommodations Policy to guide staff and outline how COG will provide certain services to accommodate people with special needs, including LEP. Staff having contact with the public will be trained by their supervisor regarding their obligations to provide meaningful access to information and services for LEP persons. Additionally, COG regularly provides diversity training for all employees.

This plan is periodically reviewed and updated. Refer to Section IV - Monitoring and Updating the Language Assistance Plan for additional information.

# I. INTRODUCTION

## Relationship between COG and the TPB

The Metropolitan Washington Council of Governments (COG) was established in 1957 by local cities and counties to deal with regional concerns including growth, housing, environment, public health and safety - as well as transportation. COG is an independent, nonprofit association supported by financial contributions from its participating local governments, federal and state grants and contracts, and donations from foundations and the private sector. Policies are set by the full membership acting through its board of directors which meets monthly to discuss area issues.

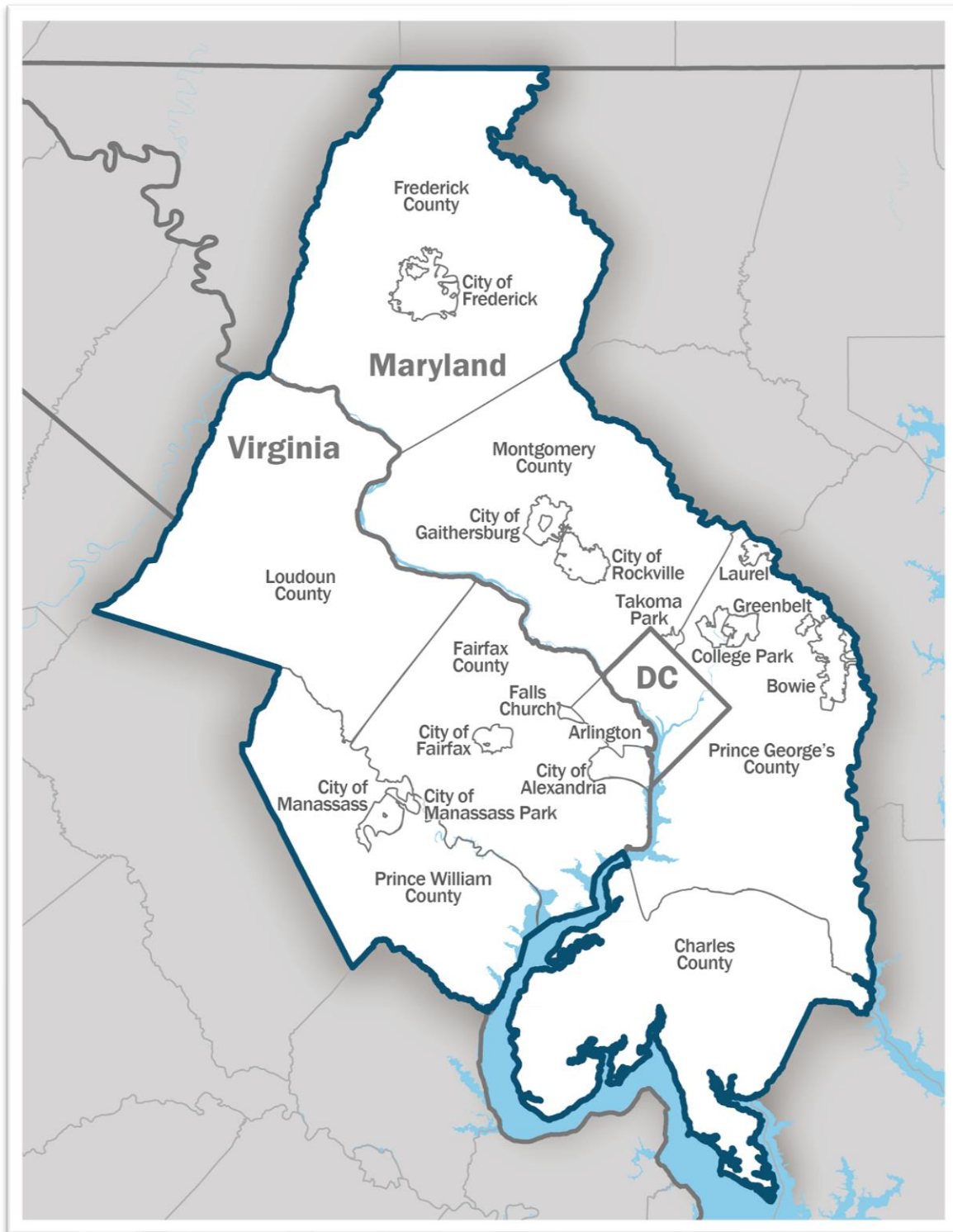
COG serves as the administrative agent for the National Capital Region Transportation Planning Board (TPB) under an agreement with the Transportation Departments of Maryland, Virginia, and the District of Columbia. The TPB was created in 1965 by the region's local and state governments to respond to federal highway legislation in 1962 that required the establishment of a "continuing, comprehensive, and coordinated" transportation planning process in every urbanized area in the United States. The TPB is designated as this region's Metropolitan Planning Organization (MPO) by the governors of Virginia and Maryland and the mayor of the District of Columbia based upon an agreement among the local governments. Although the TPB is an independent body, its staff is provided by COG's Department of Transportation Planning. COG administers a Unified Planning Work Program (UPWP) in conjunction with the TPB in accordance with the requirements of MAP-21, the Moving Ahead for Progress in the 21st Century Act (P.L. 112-141).

## The National Capital Region Transportation Planning Board

The National Capital Region Transportation Planning Board is the official Metropolitan Planning Organization for transportation planning in the metropolitan Washington region, and serves as the transportation policy committee for the Metropolitan Washington Council of Governments. As the MPO for the region, the TPB carries out several important federal planning requirements, including the development of transportation plans and programs and analyzing the plans for compliance with federal regulations. The TPB Bylaws state: "the TPB shall be responsible for the development of policies of regional significance ... for the effective implementation of [the sections] of the United States Code concerning a metropolitan transportation planning process".

The TPB plans for an area that covers approximately 3,500 square miles and includes over 5.9 million people and over 3.7 million jobs. The TPB planning area is shown in Figure 1 below and includes the District of Columbia, Suburban Maryland (Frederick County, Montgomery County, Prince George's County, and Charles County, plus the cities of Bowie, College Park, Frederick, Gaithersburg, Greenbelt, Laurel, Rockville, and Takoma Park), and Northern Virginia (Arlington County, Fairfax County, Loudoun County, and Prince William County, plus the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park).

**Figure 1: The TPB Planning Area**





# U.S. Department of Transportation (DOT) Requirements and Guidance on Language Access

## FEDERAL TRANSIT ADMINISTRATION REQUIREMENTS FOR LANGUAGE ACCESS

In October 2012, FTA issued Circular C 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” which requires that recipients of Federal funds create a Language Assistance plan and provide meaningful language access to persons who are limited English proficient (LEP): “Consistent with Title VI of the Civil Rights Act of 1964, DOT’s implementing regulations, and Executive Order 13166, ‘Improving Access to Services for Persons with Limited English Proficiency’ (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP)”(chap. III-6).<sup>1</sup> Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be Limited English Proficient or “LEP.”

The COG/TPB Language Assistance Plan responds to the requirements in the Title VI Circular and provides the required elements of a Language Assistance Plan as described on page III-8 in the Circular, Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency

Executive Order 13166: “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121), Federal agencies are required to develop guidance on how recipients should, consistent with the DOJ LEP Guidance and Title VI of the Civil Rights Act of 1964, as amended, assess and address the needs of otherwise eligible limited English proficient (LEP) persons seeking access to the programs and activities of recipients.<sup>2</sup>

The U.S. DOT provided further guidance on how transportation agencies should address this Executive order in its policy guidance, summarized below.

## U.S. DEPARTMENT OF TRANSPORTATION GUIDANCE TO RECIPIENTS ON SPECIAL LANGUAGE SERVICES TO LIMITED ENGLISH PROFICIENT (LEP) BENEFICIARIES

The U.S. Department of Transportation, Office of the Secretary, issued guidance to recipients of Federal transportation aid in 2001 as to the requirement to provide language access to limited English populations.

The guidance states that, “Title VI and its regulations require recipients to take reasonable steps to ensure ‘meaningful’ access to DOT recipients’ programs and activities. The key to providing meaningful access to LEP persons is to ensure that recipients and LEP beneficiaries can communicate effectively and act appropriately based on that communication. Thus, DOT recipients

<sup>1</sup> U.S. Department of Transportation. Title VI Requirements and Guidelines For Federal Transit Administration Recipients. FTA C 4701.1B. October 1, 2012 [[http://www.fta.dot.gov/legislation\\_law/12349\\_14792.html](http://www.fta.dot.gov/legislation_law/12349_14792.html)]

<sup>2</sup> <http://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf>

should take reasonable steps to ensure that LEP persons are given adequate information and are able to participate effectively in recipient programs and activities, where appropriate.”<sup>3</sup>

This Language Assistance Plan was developed to demonstrate the commitment of COG and the TPB to ensure meaningful access, as described in the Executive Order and the U.S. DOT guidance, to all programs and activities by LEP persons.

## The TPB’S PROACTIVE APPROACH TO PUBLIC INVOLVEMENT

In order to ensure that the TPB’s planning process identifies the needs of transportation-disadvantaged population groups, the TPB has developed a proactive approach to public involvement.

TPB staff held an interactive dialogue with members of the public during development of the TPB Participation Plan, which was adopted in December 2007 and last updated in 2020. The central concept of the Participation Plan is that there are three constituencies for the TPB, each having a different level of knowledge and familiarity with the TPB and the transportation decision-making process:

**Active participants** are both knowledgeable about transportation policy issues in general, as well as the TPB’s role in the regional transportation planning process. These individuals and organizations already actively participate in the TPB process and have an extensive understanding of regional transportation issues and policy..

**Community leaders** have some knowledge of transportation policy issues but are less familiar with the TPB’s role in the regional transportation planning process. They also may not be fully aware of the regional context underlying transportation challenges and experiences throughout the region.

The **general public** has an inherent interest in transportation challenges but often possess little direct knowledge of transportation policy making.

The TPB Participation Plan<sup>4</sup> is based upon the fundamental premise that in order to most effectively use its resources the TPB must tailor its outreach to these three different groups. The TPB works in a number of ways to engage traditionally disadvantaged communities, including the LEP community, in these three constituency groups, including, an Equity principle that states: “Staff strive to incorporate an equity perspective into their work activities so that work acknowledges and seeks to accommodate different contexts, experiences, and abilities. ... It acknowledges past inequities and barriers to involvement and seeks to be more just.”

The **TPB Access for All (AFA) Advisory Committee** was specifically created by the TPB to proactively address Title VI and Environmental Justice and involve minority communities, including LEP, low-income communities, and persons with disabilities in the transportation planning process.<sup>5</sup> The AFA

<sup>3</sup> <http://www.justice.gov/crt/about/cor/lep/dotlep.php>

<sup>4</sup> <https://www.mwcog.org/documents/2020/10/21/tpb-participation-plan--outreach-public-comment-tpb/>

<sup>5</sup> <https://www.mwcog.org/tpbafa/>

was established in 2001 to advise the TPB on transportation issues, programs, policies, and services that are important to minority communities, low-income communities, and people with disabilities. The mission of this committee is to identify concerns for these traditionally transportation disadvantaged communities and to determine whether and how these issues might be addressed within the TPB planning process. AFA membership includes elected officials, transportation planners, community-based organizations, local advocacy groups, and interested citizens. Its diverse membership covers all three constituency groups identified in the TPB Participation Plan. The AFA has identified needs for improved access to transit information and the TPB has helped with such improvements through coordination with the Washington Metropolitan Area Transit Authority.

## II. DETERMINING REASONABLE ACCESS: FOUR-FACTOR ANALYSIS

In accordance with Title VI of the Civil Rights Act and the U.S. Department of Transportation Circular FTA C 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” recipients are required to take “reasonable steps to ensure meaningful access to their programs and activities by LEP persons.” The guidance recommends that the following four-factor analysis be used to help determine how to ensure reasonable and meaningful access to COG and TPB activities:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

#### **LANGUAGES SPOKEN IN THE REGION**

The U.S. Census Bureau’s American Community Survey (ACS) 2018-2022 5-year averages provide the most current source of information on those with limited English skills. The ACS asks what language is spoken at home and if English is spoken less than “very well.” Data from the ACS shows more than 32% of the region’s population speaks a language other than English at home and 12% of the region’s population speaks English less than “very well.” The languages other than English most often spoken at home are Spanish, Other Indo-European languages, Other and unspecified languages (including Amharic), Other Asian and Pacific Island languages, and Chinese, as shown in Figure 2 and 3.<sup>6</sup>

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<sup>6</sup> Determinations to identify a specific language is primarily due to the size of the population within the geographic area, in this case, the TPB Planning Area. As a result, three aggregate categories of like languages are included (Other Indo-European languages, Other and unspecified languages, and Other Asian and Pacific Island languages) and may separate out an individual language if and when it’s population is significantly large enough.

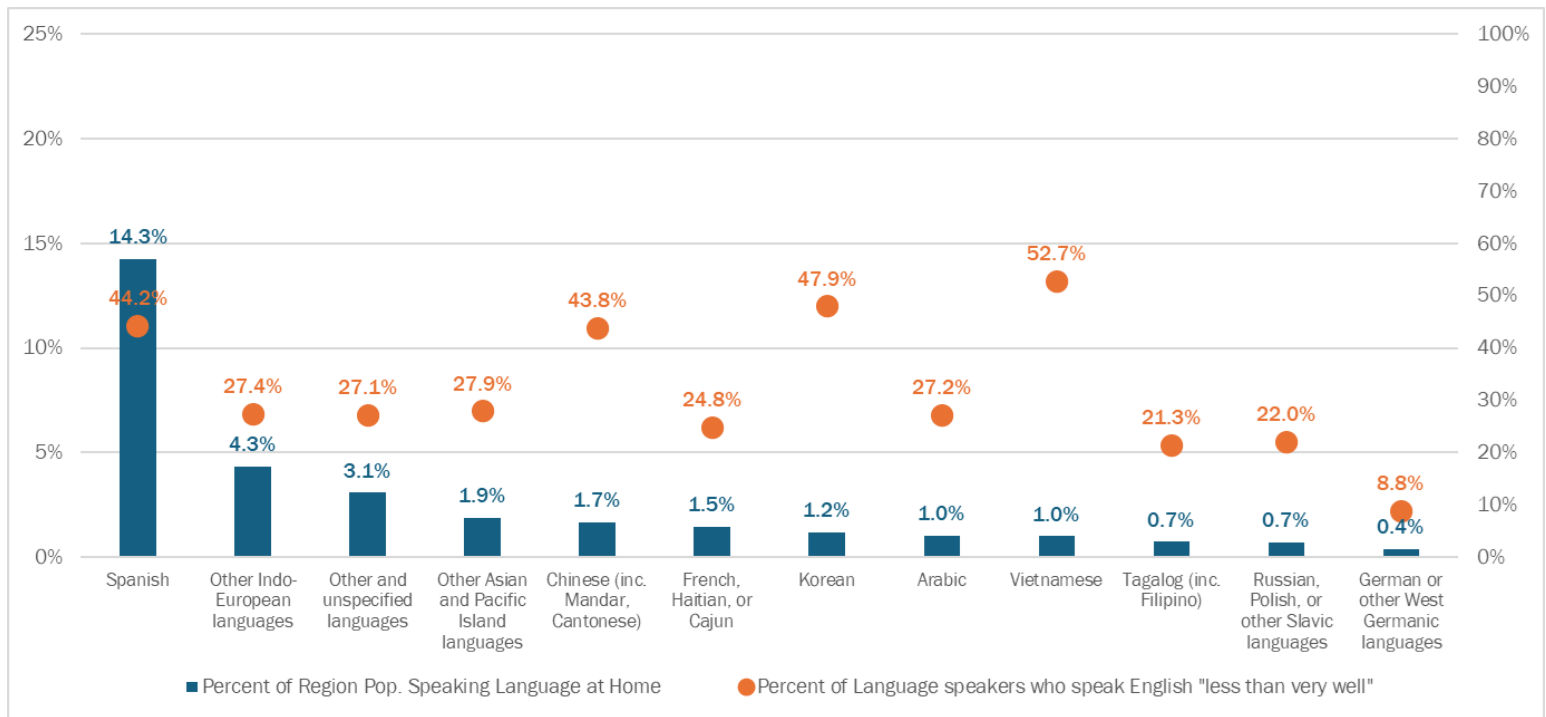
Other Indo-European languages is defined as including Haitian, Italian, Portuguese, German, Yiddish, Greek, Russian, Polish, Serbo-Croatian, Ukrainian or other Slavic languages, Armenian, Persian, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Telugu, Tamil, and Malayalam.

Other and unspecified languages is defined as including Navajo, Other Native languages of North America, Hebrew, Amharic, Somali, or other Afro-Asiatic languages, Yoruba or other languages of Western African, Swahili or other languages of Central, Eastern, and Southern Africa, and Other and unspecified languages.

Other Asian and Pacific Island languages is defined as including Japanese, Hmong, Khmer, Thai, Lao, Other languages of Asia, Tagalog, Ilocano, Samoan, Hawaiian, or other Austronesian languages.

Detailed information on languages, including definitions, can be found at U.S. Census: <https://www.census.gov/topics/population/language-use/about.html>

**Figure 2: Rates of languages other than English most often spoken at home in the Metropolitan Washington Region**



Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001; This figure includes the TPB's planning area.

**Figure 3: Estimates of total number of persons who speak a language other than English at home in the Metropolitan Washington Region**

Languages Spoken at home	Total	Total who also speak English "less than very well"
Spanish	750,8029	334,843
Other Indo-European languages	230,506	63,056
Other and unspecified languages	164,087	44,513
Other Asian and Pacific Island languages	100,859	28,134
Chinese (incl. Mandarin, Cantonese)	88,993	38,952
French, Haitian, or Cajun	77,791	19,329
Korean	63,021	30,210
Vietnamese	53,390	28,134
Arabic	55,192	15,003
Tagalog (incl. Filipino)	39,821	8,498
Russian, Polish, or other Slavic languages	37,974	8,352
German or other West Germanic languages	21,786	1,925

Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001; This figure includes the TPB's planning area.

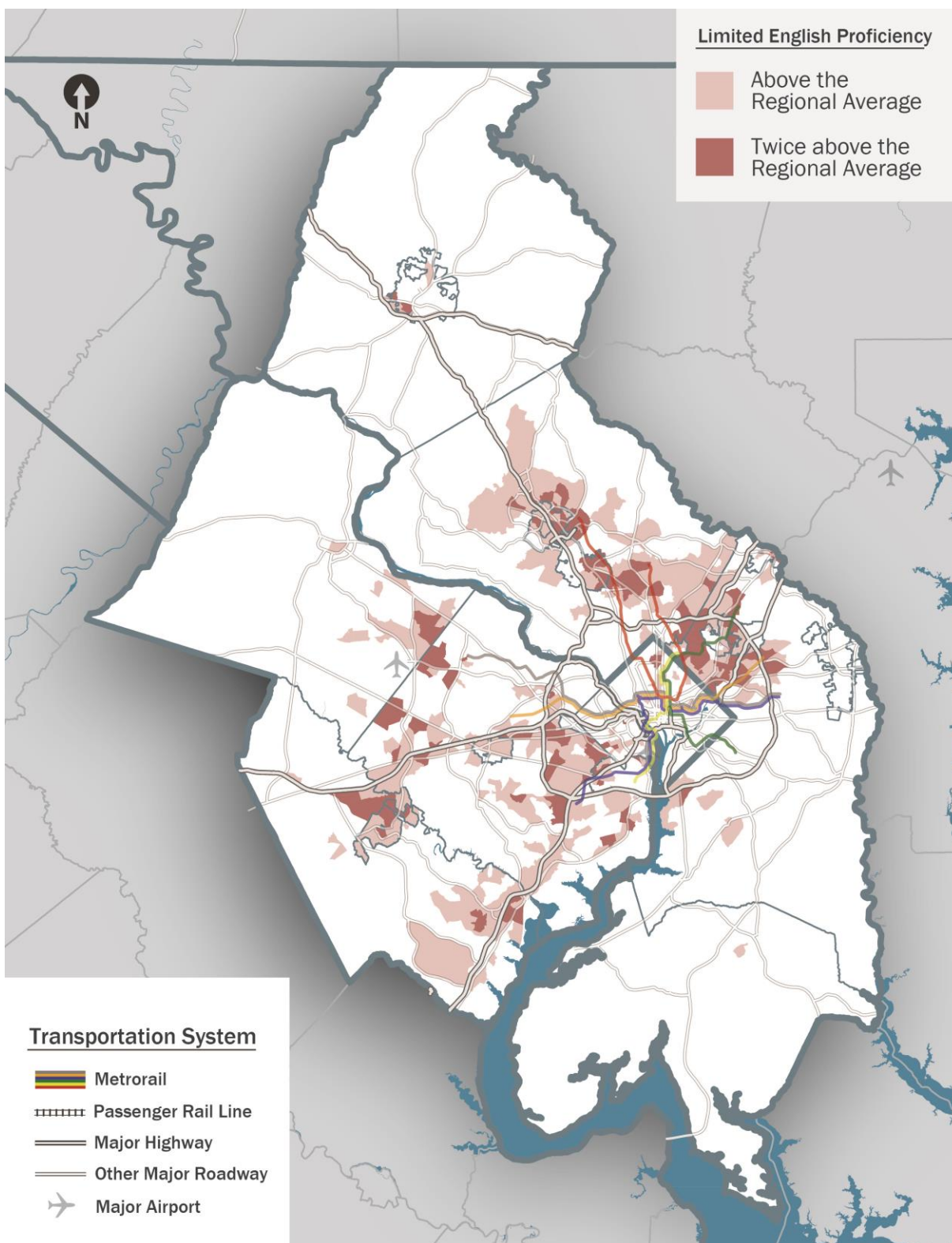
With more than 706,000 residents speaking Spanish at home, it is the most spoken non-English language in the region. Based on this information, it is most likely that special language services provided would need to accommodate people who speak Spanish. The region includes various other non-English speaking groups, too, with greater rates of limited English proficiency among the population. According to ACS data, home speakers of Spanish, Chinese, Korean, and Vietnamese have greater than forty percent of their respective populations that also speak English “less than very well” (see Figure 2). Special language services for these groups would need consideration, too.

Spatially, LEP populations in the region are geographically dispersed throughout the region, as shown in Figure 4. Regional information about LEP language access may be more useful at smaller geographic areas to help transportation planning staff understand the demographic profiles of the communities they operate in within the region.

## **HOW LEP PERSONS INTERACT WITH COG AND THE TPB**

COG and the TPB do not provide direct transportation services to the region’s residents, but rather serve as forums for regional stakeholders, decision makers, and residents to participate in planning and policy setting. Direct public transportation services include Metrorail, Metrobus, MetroAccess and local transit providers. The TPB’s Access for All Advisory Committee includes representatives of limited English-speaking communities and advises the TPB on language access issues related to transportation. LEP persons are invited to participate in public meetings and committees, comment on work being completed, and participate in region-wide surveys and outreach efforts under COG and TPB. Materials are translated upon request so that they are available to those with limited English ability.

**Figure 4: Distribution of limited English-speaking populations by U.S. Census Tract**



Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001.



## **Factor 2: The frequency with which LEP persons come into contact with the program.**

Since COG and the TPB are not direct service providers, the frequency of LEP persons interacting with agency programs is quite low. Although all committee materials, publications, and public documents are made available in other languages upon request, there are very few requests submitted in a given year. Issues pertaining to LEP persons are discussed at quarterly meetings of the TPB's Access for All (AFA) Advisory Committee, but those who represent LEP population groups normally participate in English.

## **Factor 3: The nature and importance of the program, activity or service provided by the program to people's lives.**

The activities that COG and the TPB engage in are not essential for LEP persons to go about their daily lives in the same way as direct service providers, such as Metrobus, Metrorail and local bus services. These activities include mostly policy level work and coordination between decision makers that represent the jurisdictions in the region. However, in order address the needs of all region's residents, participation from all population groups is encouraged. When conducting studies and surveys, and when public comment is welcome, LEP persons are often specifically sought out to participate in order to gather a diversity of opinions.

## **Factor 4: Resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

COG and the TPB have reviewed resources available and costs for language assistance based on past requests and expenditures. The result of this analysis shows that approximately \$10,000 per year is available for language assistance, and that the costs have not exceeded \$10,000 per year, as shown below. Resources available:

- In-house staff speak Spanish and can provide phone assistance and translate short notices or phrases;
- An administrative budget for foreign language interpreters, document and website translation (approximately \$10,000 per year);
- Free website translation through Google Translate.

Costs:

- Translation of key documents and websites (costs in the past have ranged from \$1,000 to \$5,000 per year);
- Translation of notices and ads (In-house staff);
- Limited support for answering phone calls and interpreting at meetings (in-house staff); and
- Language interpreters for meetings or focus groups (based on past requests, this has ranged from \$2,500 to \$5,000 per year).



### III. PROVIDING LANGUAGE SERVICES

The Accommodations Policy<sup>7</sup>, included below, describes how language access is provided by COG and the TPB. The policy states that translation services are available upon request for meetings that are open to the public. The policy is published on the COG website at [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) along with translations of the policy in Spanish, French, Korean, Vietnamese, Amharic, and Chinese.

The following is a list of some of the COG and TPB efforts made to provide language access:

- Advertise public comment periods in Spanish language news publications.
- Provide survey forms and web applications in multiple languages.
- Provide Spanish-speaking facilitators at forums and outreach events.
- Hire bilingual staff members.
- Google Translator is available on all COG webpages.
- Provide Spanish versions of key web pages.

The Commuter Connections program employs one full-time Spanish speaking employee that is available for their call center and assists staff with in-person contact and written communication in Spanish. Additionally, there is designated Spanish speaking staff in each COG department to handle calls from Spanish speakers.

The Commuter Connections program also periodically advertises their program via radio spots. These radio ads are broadcast in both English and Spanish.

#### Written language assistance

Key documents will be translated upon request. Staff arrange for the translation of materials through coordination with the Office of Communications and Human Resources staff who maintain a list of qualified companies that provide translation services.

The website for the Metropolitan Washington Council of Governments, including the Department of Transportation Planning subsection of that website, can be translated into over 130 different languages.<sup>8</sup> Staff incorporated Google Translate translation capability into the development of this website as a cost-efficient means of making sure that the information contained on the website is accessible to LEP stakeholders and the interested non-English speaking public.

At certain times during our planning process it is required to publish notifications of TPB activities in local newspapers (e.g. announcement of the opportunity to comment on air quality conformity determination). When this is required, a notification is published in several newspapers, including a notification written in Spanish for the Spanish-language news publications.

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<sup>7</sup> <https://www.mwcog.org/accommodations>

<sup>8</sup> <https://www.mwcog.org/transportation>

Outreach strategies for the annual Street Smart pedestrian and bicyclist safety campaign that is coordinated by the TPB include radio, video, newspaper and transit advertising.<sup>9</sup> These advertising efforts are focused on educating motorists, pedestrians and bicyclists to improve safety. Advertising materials are produced in English and Spanish.

Additionally, the Commuter Connections website is provided in Spanish, to accommodate Spanish speaking customers' participation in ridesharing and other Commuter Connections programs.<sup>10</sup>

## Training staff

Most COG staff members are not in public contact positions, however, those employees that do engage with the public receive direct training from their supervisor regarding their obligations to provide meaningful access to information and services for LEP persons. COG developed an Accommodations Policy to guide staff and outline how COG will provide certain services to accommodate people with special needs. Additionally, COG regularly provides diversity training for all employees.

In an effort to continuously improve the COG's overall compliance posture, nondiscrimination and LEP related training will be coordinated with the U.S. Department of Transportation, the Virginia Department of Transportation (VDOT), the Maryland Department of Transportation (MDOT) and the District Department of Transportation (DDOT) and made available to COG staff on an ongoing basis to ensure up to date knowledge of Title VI, other nondiscrimination statutes, and LEP guidance.

## Providing notice to LEP persons

COG's Accommodations Policy is posted online and states that translation services are available upon request for meetings that are open to the public.<sup>11</sup> It is expressed that requests for such services are appreciated seven business days in advance of a meeting to process the requests.

COG includes the following language in its significant meeting announcements and agendas to notify the LEP population(s) of the availability of language assistance:

Reasonable accommodations are provided upon request, including alternative formats of meeting materials. Visit [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) or call (202) 962-3300 or (202) 962-3213 (TDD).

In major COG publications the following text is included to notify the LEP population(s) of the availability of alternative formats of the document:

Alternative formats of this document are available upon request. Visit [www.mwcog.org/accommodations](http://www.mwcog.org/accommodations) or call (202) 962-3300 or (202) 962-3213 (TDD).

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<sup>9</sup> <http://www.beststreetsmart.net>

<sup>10</sup> <http://www.commuterconnections.org>

<sup>11</sup> <https://www.mwcog.org/accommodations>

The COG website includes a link to the Accommodations Policy and the Google Translate option on each webpage.

At certain times during the TPB planning process it is required to publish notifications of COG activities in local newspapers (e.g. announcement of the opportunity to comment on air quality conformity determination). When this is required, a notification is published in several newspapers, including a notification written in Spanish for the Spanish-language news publications.

## **IV. MONITORING, EVALUATING AND UPDATING THE LANGUAGE ASSISTANCE PLAN**

The Language Assistance Plan as part of the Metropolitan Washington Council of Governments Title VI Plan will be reviewed annually by Title VI coordinators on the COG staff. This annual review will also include a review of whether existing assistance is meeting the needs of LEP persons and whether new documents, programs, services, and activities need to be made accessible for LEP individuals. Such guidance will also be based on consideration of the frequency of encounters with LEP language groups and the availability of resources.

The TPB Access for All (AFA) Advisory Committee annually reviews the significant changes to the long-range plan and provides input to the TPB regarding the transportation-related concerns of the people they represent, including LEP persons, people with disabilities, older adults, and economically disadvantaged populations. The AFA will also review significant changes to the Language Assistance Plan and provide feedback on which TPB activities are of most importance to LEP persons. The AFA reviewed COG's Accommodations policy in October 2014, and draft translations of the policy in Spanish, French, Korean, Vietnamese, Amharic and Chinese.

Additionally, as new data is made available on the demographics of the region and the resulting transportation needs (e.g., U.S. Census Data), this Language Assistance Plan will be reviewed and updated to respond to the needs of the region's growing and changing population.