DRAFT Language Access Plan
The Chittenden County Regional Planning Commission

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Purpose

The Chittenden County Regional Planning Commission (CCRPC) is committed to building a thriving, inclusive region where every community member can fully participate in shaping the future of their community. As Chittenden County becomes more linguistically and culturally diverse, CCRPC recognizes the need to remove communication barriers to meaningful engagement.

This Language Access Plan (LAP) is a part of CCRPC's broader Public Participation Plan, and was developed using national best practices, federal guidance, and community input. It applies to all CCRPC staff, committees, and projects, providing clear policies, procedures, and responsibilities to ensure that people who use languages other than English and individuals who use alternative communication methods (such as American Sign Language, screen readers, or other aids) have access to the same information and services as English-speaking individuals free of cost.

By implementing this LAP, CCRPC:

- Complies with Title VI of the Civil Rights Act, the Americans with Disabilities Act (ADA), and guidance from the Vermont Office of Racial Equity.
- Fulfills its Metropolitan Planning Organization (MPO) obligations to provide meaningful access and robust public participation opportunities for all community members, as required by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA).
- Demonstrates its commitment to inclusive planning and equitable outcomes for the region's future, consistent with CCRPC's Equity Statement and the following ECOS Plan

Goal: Develop, support, and implement collaborative planning systems that are equitable, accessible, and inclusive.

The Federal Mandate for Language Access

Federal laws and policies guarantee people access to written, verbal, or visual materials or services in their preferred languages.[1] This LAP ensures that CCRPC complies with the following laws and standards:

Title VI of the Civil Rights Act

Title VI prohibits discrimination based on race, color, or national origin[2] in any program or activity receiving federal funding. This prohibition has been interpreted to include language access because English-only practices may exclude individuals based on national origin. Agencies must take reasonable steps to provide meaningful access for individuals with language access needs, including translation of vital documents and provision of interpretation at meetings.[3]

American with Disabilities Act (ADA)

The ADA requires that public agencies ensure individuals with disabilities have equal opportunity to participate in programs, services, and activities. This includes providing auxiliary aids and services such as sign language interpreters, captioning, screen reader–compatible materials, and accessible meeting formats. By integrating these requirements into the LAP, CCRPC provides accessibility beyond spoken and written language, extending to all forms of communication.

MPO Public Participation Requirements (FHWA/FTA)

As the region's designated MPO, CCRPC must comply with federal public participation requirements established by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). These regulations require MPOs to maintain a Public Participation Plan that explicitly addresses how LEP individuals and other underserved populations will be engaged in transportation decision-making. By embedding language access practices into its engagement processes, CCRPC complies with MPO requirements and demonstrates its commitment to inclusive regional planning.

Definitions

Bilingual/Multilingual: A person who is bilingual is fluent in two languages, and a person who is

[1] Julia Haskins, "Moving From Language Access to Justice," de Beaumont Foundation, June 1, 2022, https://debeaumont.org/news/2022/moving-from-language-access-to-justice/.

[2] Note that national origin includes birthplace, ethnicity, ancestry, culture, language and accent, presentation/expression, and citizenship or residency.

[3] Although a 2025 executive order designated English as the official language of the United States, it does not override federal civil rights statutes, and CCRPC's obligations under Title VI remain in effect.

multilingual is fluent in two or more languages. Someone who is bilingual or multilingual may be able to perform their job duties in two or more languages, but they are not necessarily qualified to translate or interpret.

Interpretation: A service that involves the real-time conversion of spoken or signed communication between languages, enabling individuals to understand and engage with one another effectively.

Language Access: Providing individuals with language or communication needs meaningful access to programs, services, and information.

Language Justice: The right for all people to communicate in the language they prefer.

Limited English Proficiency (LEP): Describing persons with limited ability to communicate (e.g. speak, read, write, or understand) effectively in English. According to the U.S. Census Bureau, an LEP individual is anyone above the age of 5 who reported speaking English less than "very well" (the classifications are "very well," "well," "not well," and "not at all"). While the federal government uses this term to describe people who have difficulty understanding English, the Vermont Office of Racial Equity recommends using "people with language access needs," "people with communication access needs," or "people who use languages other than English."

Translation: The process of adapting written text in one language to written text in another language, with consistent and accurate meanings.

Vital Document: Paper or electronic materials that contain information that is critical for enabling meaningful access to CCRPC's programs, activities, and services, or contain information about procedures or processes required by law. Classification of a document as "vital" may depend upon the importance of the program, information, encounter, or services involved, and the consequence to the person with language needs if the information is not provided accurately or in a timely manner.

Background Research

To develop this LAP, CCRPC researched national best practices, leaning heavily on the following language access plans and guiding documents:

- Language Access Procedure, City of Winooski, VT *[not publicly available]*
- 2023 Language Access Report, State of Vermont Office of Racial Equity
- Language Access Policy, City of Burlington, VT
- Language Access Plan, Town of Chapel Hill, NC
- Language Access Plan, Town of Carrboro, NC

- Language Access Plan, Vermont Agency of Natural Resources
- Language Access Plan, U.S. Department of Transportation
- Language Access Plan Template, Vermont Agency of Transportation *[not publicly available]*

Additionally, CCRPC's Community Engagement Advisory Committee (CEAC) is charged with supporting the update of CCRPC's Public Participation Plan. The CEAC collaborated with CCRPC staff in developing and recommending this plan to the CCRPC Board for adoption. This policy was informed by CEAC input; below is a summary of key feedback and priorities that guided its development:

- Support for clear, organization-wide expectations to ensure consistent and scalable language access practices.
- Preference for the term "people with language access needs," with emphasis on integrating broader communication access, including ADA-related needs.
- Recognition that language needs are complex (including dialect and preference) and should be addressed with cultural competence and context.
- Strong preference to prioritize interpretation across more languages over extensive written translation, paired with clear and accessible notices in materials that free language assistance is available and how to request it.
- Emphasis on using multilingual statements of services available, plain-language summaries, and alternative engagement methods (e.g., facilitated discussions) rather than relying solely on translated surveys or documents.
- Recommendation to prioritize outreach and relationship-based engagement, working through community partners, liaisons, and trusted networks, over document-based communication.
- Interest in expanding accessible communication strategies, including multilingual videos explaining CCRPC's role and available language services, clearer website messaging about how to access services, and translated plain-language summaries of key documents paired with active outreach and engagement.
- Guidance that targeted engagement efforts should include advance translation of relevant materials, while ongoing committee work may rely more on interpretation and in-meeting support rather than full document translation.
- Emphasis on ensuring adequate resources, staff training (including working with interpreters and cultural competency), and accountability mechanisms to support effective implementation.
- Importance of maintaining an accessible and clear complaint process and incorporating language access into ongoing evaluation and reporting efforts.

Assessment

Federal Title VI guidance requires agencies receiving federal funding to take reasonable steps to

ensure meaningful access for individuals with Limited English Proficiency. Because CCRPC receives most of its funding from the U.S. Department of Transportation, it uses the federally recommended four-factor analysis to assess language needs and guide this Language Access Plan.

The four factors consider: (1) the number or proportion of people with language access needs; (2) the frequency of contact with CCRPC programs and services; (3) the importance of those programs and services; and (4) the resources available and associated costs. This analysis helps CCRPC prioritize where language access resources are most needed.

Factor 1: Prevalence of People with Language Access Needs

Chittenden County is Vermont's most populous and linguistically diverse county, with an estimated population of 170,851 (July 2024). According to the U.S. Census Bureau's American Community Survey (ACS) 2019–2023 five-year estimates, approximately 9.2% of residents age five and older speak a language other than English at home. The 2024 ACS one-year estimate places that figure at approximately 10.6% (17,413 individuals).

However, speaking a language other than English at home is not equivalent to having language access needs. Under federal Title VI guidance, the relevant population is individuals who speak English less than "very well." ACS data indicates that approximately 3–4% of Chittenden County residents (about 5,000–7,000 individuals) fall into this category and may require interpretation or translation services to meaningfully participate in public programs and planning processes.

Given that Chittenden County is home to Vermont's most diverse population, statewide Census data provides useful context for understanding language trends. The ACS 2019-2023 five-year estimates identify the most commonly spoken languages in Vermont other than English, as French, Spanish, German, Serbo-Croatian, Russian, Italian, Portuguese, Polish, Hindi and Ukrainian. However, available detailed data for Chittenden County is limited and somewhat dated (circa 2015), and recent ACS releases do not consistently provide detailed local language breakdowns.

While ACS data remains the most consistent and federally recognized baseline, published rankings of "most common languages spoken at home" do not fully capture actual language access needs in Chittenden County for several reasons.

1. Speaking a language other than English at home is not equivalent to Limited English Proficiency. Many multilingual households report speaking English "very well" and do not require assistance. Title VI compliance focuses on individuals who speak English less than "very well," not simply on multilingual households.
2. ACS language categories aggregate many distinct languages into broader groupings. For example, languages spoken by African refugee communities in Vermont may appear under

"Other African languages." This aggregation can obscure specific languages such as Maay Maay, Kirundi, Kinyarwanda, Kizigua, Karen dialects, or Pashto. As a result, smaller but highly concentrated language communities may not appear individually in ranked tables even when they represent significant language access needs in particular areas.

3. Vermont's small population size affects statistical reliability. Language data relies on five-year pooled ACS estimates, and margins of error can be substantial. In some cases, detailed language breakouts are suppressed or statistically unreliable, particularly at smaller geographic scales. While county-level data is available in recent ACS releases, detailed and stable rankings of specific languages at the municipal scale are limited.
4. Demographic change may outpace federal survey cycles. Refugee resettlement and secondary migration patterns can shift over a few years. Because five-year ACS estimates pool data across multiple years, emerging language communities may not be fully reflected in published tables until several survey cycles later.
5. Immigrant, refugee, and mixed-status households may be undercounted in Census surveys due to distrust of government, housing instability, or language barriers in survey administration. This may lead to underrepresentation of certain language groups in official data.

For these reasons, CCRPC supplements ACS data with municipal school district multilingual learner data and input from local service providers, which better reflects current community conditions and emerging language needs.

School district data indicates substantial linguistic diversity across municipalities:

- **Winooski School District:** ~300 multilingual learners (30%+ of student body), with over 20 languages. Most common languages include Nepali, Swahili, Somali, Maay Maay, Spanish, Arabic, Karen, French, Burmese, and Hindi.
- **Burlington School District:** ~900 multilingual students (~25% of student body), with over 500 receiving English language services. Most common languages include Arabic, Burmese, French, Kirundi, Nepali, Spanish, Swahili, and Vietnamese.
- **South Burlington School District:** 40+ languages spoken. Most common languages include Nepali, Somali, Arabic, Spanish, French, and Swahili.
- **Essex Westford School District:** ~350 multilingual learners, with over 36 languages. Most common languages include Nepali, Spanish, Vietnamese, Bosnian, Maay Maay, French, Swahili, Arabic, and Somali.

Based on a review of ACS data, school district multilingual learner data, and guidance from the Vermont Office of Racial Equity, the languages most consistently encountered in Chittenden County that are most likely to include people with language access needs, are:

- Nepali
- Somali
- Swahili

- Arabic
- Spanish
- French

Language access also includes communication accessibility beyond spoken language. Vermont has an estimated 70,000 residents with hearing loss and approximately 13,000–16,000 individuals with low vision or blindness (Vermont Department of Health estimates). Based on population share, roughly 25% of those residents reside in Chittenden County, underscoring the need for ASL interpretation, captioning, plain-language materials, and accessible formats.

CCRPC will update this analysis periodically using the most recent ACS five-year data, municipal-level data, and community partner input to ensure compliance with Title VI and to align language access resources with actual engagement geography.

Factor 2: Frequence of Contact with People with Language Access Needs
Because CCRPC does not provide direct services, contact with individuals with language access needs occurs primarily through public-facing planning activities, including committee participation and project-specific outreach.

Documented participation to date has been limited. This may reflect the technical nature of regional planning, reliance on English-language materials, and structural barriers to participation rather than an absence of language access needs. Some engagement from multilingual residents has occurred through the Community Engagement Advisory Committee (CEAC) and localized, community-based planning efforts.

CCRPC recognizes that limited participation does not equate to limited need. The organization will continue to provide language access accommodations and implement proactive strategies to reduce barriers. Because language access needs are often geographically concentrated, CCRPC will assess and address needs at the local level rather than relying solely on countywide data.

Factor 3: Importance of CCRPC Activities and Services to People with Language Access Needs
While few CCRPC activities have immediate, direct impacts, CCRPC's work shapes long-term public policy and investment decisions that affect daily life, including transportation, land use, housing, infrastructure, climate resilience, and economic development. Meaningful access to planning processes is therefore important to ensure that people with language access needs are not excluded from decisions that shape the region's future.

CEAC members emphasized that individuals with language access needs do not typically engage with CCRPC through written documents alone. Instead, direct outreach, relationship-building, and verbal engagement are often more effective. As a result, written translation should be paired with

interpretation, community partnerships, and other engagement strategies to ensure meaningful and accessible participation.

Factor 4: Resources Available and Cost
Given the relatively small proportion of residents with language and communication access needs in Vermont and Chittenden County, CCRPC has not experienced significant financial or administrative burdens in providing accommodations and maintains the ability to provide services.

CEAC feedback indicates that resources are most effectively allocated toward interpretation, direct outreach, and engagement through trusted community partners rather than extensive written translation, allowing CCRPC to provide more meaningful access while balancing available resources and ensuring timely, effective language assistance.

Language Access Policy

General Statement of Policy
It is the policy of CCRPC to provide people who speak languages other than English and who have language access needs meaningful access to its programs, services, and activities. Ensuring meaningful access means providing accurate, timely, and effective language access services that are free of charge and consistent with federal law.

It is also the policy of CCRPC to provide effective communication to people who are Deaf, Hard of Hearing, blind, Deaf-blind, use other modes of communication, or are protected by the American with Disabilities Act. CCRPC will provide effective communication at no cost and in a timely manner to allow an equal opportunity to participate in CCRPC programs, services, and activities. CCRPC will provide effective communication in such a way as to protect the privacy and independence of the individual.

Policies for the Notice of Availability of Language Assistance Services

1. **CCRPC will proactively notify individuals who prefer a language other than English or have other communication needs of their right to language assistance services at no charge, including how to request services and how to submit a language access complaint.**
    a. Language assistance notices, including how to request services, will be provided in a variety of ways, including, but not limited to:
        i. Clearly on the CCRPC website;
        ii. On CCRPC committee and Board meeting agendas;
        iii. In project outreach materials, meeting announcements, and agendas;
        iv. Providing “I Speak” language identification posters in the office, during public meetings, and at events;

v. Partnerships with trusted community liaisons and organizations to help residents understand their rights and available services.

b. CCRPC will notify individuals of their right to file a complaint related to language access and make this process available on its website and in public-facing locations.

Policies for Translation and Interpretation

1. **CCRPC will provide translation and interpretation services at no cost upon request or when a language access need is identified, and will make reasonable efforts, consistent with available resources, to ensure timely and meaningful access.**
    a. **Standing Committees & Board |** CCRPC will coordinate language access services for its standing committees and Board meetings when needed to support meaningful and inclusive participation.
    b. **Project-Related Activities |** CCRPC will provide language access accommodations for project-related activities, including public meetings, small group discussions, one-on-one interactions, and other engagement events. Services will be provided upon request or when language access needs are identified. In some cases, CCRPC may proactively arrange interpretation or translate outreach materials, particularly when projects involve communities with known language access needs or when participation from these populations is anticipated. When feasible, CCRPC will advertise the availability of language assistance in multilingual outreach materials.
    c. **Format |** Interpretation may be provided in person, virtually, or through app-based services, as appropriate. CCRPC will select service delivery methods that support meaningful participation while using public resources responsibly and ensuring effective meeting operations.
    d. **Requests & Response |** Individuals may request interpretation for meetings or interactions with CCRPC staff, as well as translation of relevant CCRPC documents or communications. Request are encouraged at least five business days in advance to allow for scheduling. CCRPC will respond in a timely manner and determine the most effective method of providing access based on the request, context, and available resources. This may include live interpretation, written translation, plain-language summaries, or direct outreach.

    If a language access need arises without advance notice, CCRPC will make reasonable effort to provide immediate access, including use of phone- or video-based interpretation services or alternative methods of communication. CCRPC staff will respond to written communications in languages other than English by utilizing bi-lingual staff or contracted language service providers.

e. **Qualified Interpreters and Translators |** CCRPC will use qualified providers for interpretation and translation services (see Appendix A for providers). Individuals may bring their own interpreter if they choose; however, staff should inform them that free language assistance services are available. CCRPC will avoid using minors as interpreters except in emergency situations.

2. **CCRPC will provide written translation of vital and high-priority documents and communication as needed to ensure meaningful access. Translation will be prioritized by community need and frequency of use, with resources allocated strategically.**
    a. **Inventory & Identification |** CCRPC will maintain and periodically update an inventory of vital and high priority documents accessible to staff and the public, with hard copies available upon request. CCRPC will apply federal guidance to determine when written translation of vital documents is warranted, while also incorporating community input and CEAC feedback to inform which documents are considered vital and where proactive translation efforts will be most effective.
    b. **Targeted Translation Approach |** Translation of all CCRPC materials into multiple languages is not warranted due to the relatively small and geographically concentrated populations of people with language access needs and the variability of languages spoken over time. Translation efforts will focus on materials that are critical to participation, rights, or access to programs. For large, technical documents, CCRPC may translate summaries or key sections and provide interpretation or additional support upon request.
    c. **Non-Vital Documents |** For non-vital materials, CCRPC will prioritize alternative methods of communication, including plain language summaries, interpretation, visual materials, and direct outreach through community partners and liaisons to ensure information is accessible and meaningful.
    d. **Meaningful Access Commitment |** Vital document guidance applies only to written translation and does not limit CCRPC's broader obligation to provide meaningful access. Language assistance will be provided upon request regardless of language.
3. **CCRPC commits to using competent, trained, and culturally sensitive translators and interpreters.**
    a. CCRPC will maintain a network of qualified resources for language services and a list of vetted vendors and community liaisons for translation services, in-person interpretation services, and video and telephonic interpretation services [See Appendix A].
    b. Translated materials will be evaluated for accuracy. CCRPC will solicit input and feedback on the accuracy of translation and interpretation from community partners and leaders.

Policies for Accessible Meetings and Materials

1. **CCRPC will ensure meetings are accessible through a variety of methods, including (but not limited to):**
    a. Providing captioning services (live or automated) for virtual and in-person meetings;
    b. Using screen reader–compatible materials, including PDFs, Word documents, and web content;
    c. Creating alternative meeting materials, such as providing large-print or Braille materials upon request;
    d. Providing sign language interpreters (ASL) when requested in advance;
    e. Ensuring meeting spaces are ADA-compliant with barrier-free entry, seating, restrooms, and audio support as needed;
    f. Providing hybrid or remote participation options when possible, to expand accessibility for individuals unable to attend in person.
    g. Using plain language (information that is easy for the public to read, understand and use) wherever possible and explaining technical terms and acronyms.

Policies for Staff Training

1. **CCRPC will provide periodic staff training and new employee orientation on its Language Access Plan.**
    a. All staff will be trained in the policies and procedures in the LAP and the availability of language services and resources.
    b. User guides for accessing services and effective communication techniques as well as tips on working with an interpreter will be available to all staff.

Policies for Language Access Monitoring & Evaluation

1. **CCRPC will monitor and evaluate the effectiveness of its Language Access Plan and update it periodically based on identified needs, community input, and available resources. CCRPC will:**
    a. Review the LAP annually and recommend updates as needed.
    b. Assess language access needs using demographic data, community feedback and engagement with local partners.
    c. Track the use of language access services, including interpretation, translation, and other communication supports, to inform planning and resource allocation.
    d. Conduct an annual internal assessment of staff use of language services, resources, and needs.
    e. Prepare an annual summary of language access activities and services.
    f. Maintain a language access complaint process and will accept and respond to complaints in individuals' preferred languages.
    g. Protect individual privacy and confidentiality in all monitoring and documentation activities.

Language Access Procedures

Procedures for the Notice of Availability of Language Assistance Services

Staff should notify the public of availability of free language assistance services through the following procedures:

- **Website |** CCRPC will ensure that language assistance information is clearly visible and accessible on its website. This includes:
    - Providing a clear and prominent option to translate webpages using Google Translate or similar tools;
    - Including language access information on key webpages, including how to request interpretation or translation services;
    - Ensuring the Title VI and ADA complaint process is easy to locate and understand;
    - Considering the use of multilingual videos to explain CCRPC's role, how to participate in planning processes, and the availability of free language services, as a supplement to written materials.
- **Standard Language Access Statement |** Include the following statement in in all formal outreach documents, meeting announcements, agendas, and vital documents. The text should be in at least 12-point font and consistent with the document's formatting:

The Chittenden County Regional Planning Commission (CCRPC) will ensure its public meetings and materials are accessible to all. To **request** free interpretation, translation, assistive devices, or other reasonable accommodations, contact Emma Vaughn, CCRPC Title VI and ADA Coordinator, at (802) 846-4490 ext. 121 or evaughn@ccrpcvt.org at least five business days before the meeting when possible.

- **Abbreviated Language Access Statement |** For materials with limited space, such as postcards, staff may use the following shortened statement. The full Language Access Statement above should be used whenever possible. A QR code linking to additional language access information may be included when appropriate.

Language assistance, interpretation, or ADA accommodations are available at no cost. Please contact [Name] at [phone/email] at least five business days before the event.

- **Language Identification Tools |** Rely on self-identification by individuals and use "I Speak" language identification cards or posters (see Appendix B) to determine language needs. Staff should have these tools available at in-person meetings and community events, including those held outside CCRPC offices.

- **Verbal Notification at Meetings |** At the close of public meetings, staff should remind participants that meetings are open to all and that language assistance and other accommodations are available upon request with advance notice.
- **Community Partnerships |** CCRPC will Maintain and support partnerships with trusted community liaisons and organizations to help communicate the availability of language assistance services and encourage participation.

[Call-out Box] If communication seems impaired, err on the side of assuming limited English proficiency or other communication needs. Use the "I Speak" card and ask open-ended questions to determine language and proficiency.

Procedures for Providing Translation and Interpretation

CCRPC staff will follow the procedures below to identify, arrange, and provide appropriate language access services across programs, meetings and communications.

[Call out box] What is the difference between interpretation and translation? An interpreter is trained to convert oral messages from one language to another in real time. They are often used for meetings. A translator is trained to convert written text from one language to another. They help with converting text in documents and presentations to another language.

Step 1: Identify Language Access Needs

- Determine whether a language or communication need has been requested or is likely based on the project, location, or audience. Use available data, community knowledge, or engagement context to anticipate needs when possible.
- Rely on self-identification and, when needed, use "I Speak" tools to confirm language needs.

Step 2: Select Appropriate Service

- **Immediate or unplanned language access needs:** Use on-demand phone or video interpretation services. For ASL or Deaf/Hard of Hearing access, use On-Demand ASL or Vermont Relay (RCC for captioning).
- **Planned meetings with anticipated language access needs:** Schedule in-person interpreters in advance.
- **Deaf, hard of hearing, and DeafBlind access:** Arrange ASL interpretation or captioning services as appropriate.
- **Planned project engagement with multilingual residents:** Use multilingual liaisons or cultural brokers for outreach and co-facilitation.
- **Written materials (documents, slides, forms):** Use translation services for vital or high-priority documents. Consider creating one-page, or shorter summaries of long, dense materials.

- **Video content and multilingual outreach:** Use video translation or media services.
- **Quick Communication:** For brief, informal, or back-and-forth communication (e.g., clarifying logistics or basic information), staff may use tools such as Google Translate to facilitate real-time communication. These tools should not be used in place of professional interpretation or translation for substantive conversations, decision-making, or the exchange of important or sensitive information.

See Appendix A for a list of approved providers and service options.

Step 3: Arrange Services & Prepare for Effective Communication

- Submit requests for interpretation or translation as early as possible; at least five business days in advance is recommended for most services.
- Confirm logistics, including format (in-person, virtual, hybrid), timing, and language(s) required.
- Share relevant materials with interpreters or translators in advance when possible.
- Identify technical terms, acronyms, or project-specific language that may require clarification.
- Ensure meeting formats and materials support interpretation (e.g., pacing, facilitation approach).

[Call Out Box] Guidance: Proactive Translation of Project Materials
Use a targeted, context-specific approach when deciding whether to proactively translate materials. Translation is not needed for all projects and should be based on anticipated need, project location and available resources.

- Consider proactive translation when projects occur in areas with known multilingual populations or when participation from people with language access needs is anticipated.
- For outreach materials (flyers, announcements), prioritize translation when the goal is to broaden participation. At a minimum, include a short multilingual statement indicating that free language assistance is available and how to request it.
- For surveys, full translation may not always be the most effective strategy. Instead, consider including a brief multilingual statement explaining the survey purpose and how to access interpretation to provide feedback. Supplement with other engagement methods (e.g., facilitated discussions, community partnerships, multilingual liaisons).
- For project materials (reports, presentations), prioritize translating summaries, key information, or decision points rather than full technical documents.
- When resources are limited, prioritize interpretation and direct engagement over extensive written translation.

Step 4: Conduct Meetings and Engagement Activities

- When working with interpreters:

  - Speak clearly, using short sentences that contain one idea at a time and at a moderate pace.
  - Use plain language and avoid jargon, acronyms, or complex phrasing. Consider sharing acronyms and technical terminology in advance.
  - Communicate directly with participants, not the interpreter.
  - Allow time for interpretation between statements.
- If a language access need arises without advance notice, make reasonable efforts to provide immediate access using available tools (e.g., phone or video interpretation). If full interpretation cannot be arranged immediately, provide alternative methods of communication and follow up as needed.

Step 5: Documentation:

- Using the Language Access Services Documentation Form, document when language services are requested or provided to inform future planning and resource allocation.

Procedures for Vital Documents

Translating vital documents is a federal requirement for organizations receiving federal financial assistance to ensure meaningful access for all community members. “Vital documents” are public-facing, non-confidential materials that are crucial for individuals to access programs or services or exercise rights. A document is treated as vital if one or more apply:

- It is critical to a legal or civil rights process (e.g., Title VI complaint procedure).
- It is critical to accessing CCRPC programs or decision-making (e.g., required notices for public comment or appeal windows).
- Without it, misunderstanding would likely cause financial, physical, safety, or other harm.
- It provides emergency or public safety information (e.g., detour/safety alerts tied to CCRPC-led projects).

Step 1: Identifying Vital Documents

Based on current practices and CEAC input, CCRPC has identified the following materials as vital or high-priority for accessibility, along with corresponding strategies:

- **Stipend Opt-In & Acknowledgement Form |** Proactively translate into the top six languages identified in the region.
- **Project Outreach Materials |** Determine language needs based on project location and target population; translate key materials as appropriate.
- **Title VI & ADA Complaint Forms |** Ensure forms are accessible on CCRPC’s website and available in the top languages; provide interpretation upon request.
- **Regional Plans (e.g., ECOS Plan, MTP, CEDS) |** Develop plain-language, one-page summaries in English and translate into the top six languages; pair with outreach and engagement.

- **Funding Opportunities |** When opportunities are open to community members, provide translated materials in the top languages and/or distribute information through community partners and liaisons.

This list will be updated periodically based on community input, project experience, and ongoing evaluation.

Step 2: Applying Safe Harbor Standards
CCRPC will also employ the federal Safe Harbor standard as a minimum for written translation of vital documents. This includes:

1. Providing written translation for each language group that constitutes 3% or 500 individuals (whichever is less) of the population eligible to be served or affected; and
2. Providing written notice, in applicable language, informing individuals of their right to free oral interpretation of written materials.

In Chittenden County, the applicable threshold is 500 individuals. Based on available data as of March 2026, Spanish and Nepali are the only two language groups likely to meet this threshold.

In practice, CCRPC may go beyond Safe Harbor requirements based on context, geographic area, and community input. This may include translating materials into the region's six most commonly spoken language or tailoring language access strategies to specific municipalities or populations. When language groups fall below the threshold, or when written translation is not the most effective method of communication, CCRPC may prioritize interpretation, direct outreach, and partnerships with trusted community members to support meaningful engagement.

Step 3: Determine the Scope of Translation
When translation of a vital document is warranted, staff will determine the appropriate scope of translation by considering:

- The length and complexity of the document;
- Whether full translation is necessary to ensure meaningful access;
- Whether translating key sections is sufficient to support participation and understanding.

Step 4: Ongoing Review
Staff will revisit determinations of vital documents and translation needs over time, incorporating updated demographic data, community feedback, and lessons learned from project implementation. This approach ensures that vital documents are accessible to a significant portion of the community while balancing resource constraints and administrative burden. It also reflects consistent feedback from multilingual community members that direct, verbal engagement is often more effective than written translation. Safe Harbor guidance applies only to written translation and does not limit CCRPC's broader obligation to provide meaningful access. Individuals will be provided language assistance upon request, regardless of language.

Procedures for Accessible Meetings & Materials

- **Use Plain Language |** Communicate information that is easy for the public to read, understand, and use.
    - Limit use of jargon, abbreviations, acronyms, and technical language (Resource: use U.S. Government Plain Language Website for support).
    - Aim to write all public communications at grade 8 reading level or lower (Resource: use the Hemingway Editor to evaluate the reading level of your content).
    - Create plain language summaries of vital documents before translating into languages.
- **Meeting Accessibility |** Ensure meetings, in person and virtual, are accessible to all.
    - Ensure facilities used for meetings or events are physically accessible for persons with physical disabilities.
    - Provide captioning services (live or automated) for virtual and in-person meetings.
        - Teams: go to the meeting toolbar, click "More" (...), then select "Language and speech" > "Turn on live captions." Captions will display in real time at the bottom of participants' screens.
        - Zoom: click "Live Transcript" (or "Captions") in the meeting controls, then select "Enable Auto-Transcription" or assign a participant/third-party service as the captioner. Captions will then appear in participants' Zoom windows in real time.
    - Providing hybrid or remote participation options when possible, to expand accessibility for individuals unable to attend in person.
    - Be prepared to provide the following aids and services if/when requested:
        - Readers and notetakers;
        - Assistive listening systems and devices;
        - Communications Access Realtime Translation (CART);
        - Assistive technologies;
        - Information provided in large print, Braille, audible, or electronic formats.

      Review the website for the Vermont Department of Disabilities, Aging, and Independent Living for a comprehensive list of aids and services for people using various modes of communication.
    - Consider ways of communicating that put the onus of accommodation on us and not on the individual requiring services.
- **Accessible Materials |** Ensure screen reader–compatible materials, including accessible PDFs, Word documents, and web content (Resource: review the Vermont Accessibility Policy for web accessibility standards and design considerations adopted by the State).
    - Use proper headings and styles (not just bold text) for structure.
    - Add alternative text (a short written description) for all images, charts, and graphics.

  - Write descriptive link text (avoid “click here”).
  - Export PDFs with tags enabled; don’t use image-only scans.
  - Check accessibility using built-in tools in Word, Adobe Acrobat, or your web platform.
  - Use high color contrast and avoid conveying meaning by color alone.
  - Provide a Google Translate disclaimer for any information translated using Google Translate.
- Resources:
  - Best Practices for Accessible Meetings, Vermont Department of Transportation
  - Checklists to Incorporate Accessibility into Your Work, State of Vermont Communications and Marketing Office

Procedures for Monitoring & Evaluation

CCRPC will implement the following procedures to monitor language access needs, service delivery, and effectiveness:

- **Service Tracking |** Upon the completion of a project, document requests for and use of interpretation, translation, and other communication access services, including language, type of service, and context using the Language Access Services Documentation Form. Records will be maintained in a manner that protects individual privacy and confidentiality.
- **Community Feedback & Complaints |** Staff will document all language access–related complaints, feedback, and suggestions received through meetings, communications, or the formal complaint process. Complaints will be directed to the Title VI & ADA Coordinator and logged in accordance with CCRPC’s Title VI procedures. Staff will coordinate with the Coordinator to ensure responses are provided in the individual’s preferred language. Trends and recurring issues will be summarized annually and incorporated into monitoring, reporting, and updates to the Language Access Plan.
- **Annual LAP Review |** The Outreach & Engagement Manager, in collaboration with the CEAC, will review this LAP annually and update it as needed to ensure continued effectiveness and compliance. Monitoring activities will include:
  - Tracking of the use of language and communication access services;
  - Reviewing demographic trends in the community using updated data and partner input;
  - Assessing staff experience, capacity, and needs related to language access services.
- **Annual Reporting |** The Outreach & Engagement Manager will prepare an annual summary of language access activities for inclusion in the Public Participation Plan Annual Report. This will include:
  - Use of interpretation, translation, and other communication access services;
  - Languages requested and served;
  - Types of services provided and project contexts;

- Complaints, feedback, or suggestions related to language access.

Filing and Resolving Complaints about Language-Based Services

CCRPC maintains a formal process for addressing complaints related to language access and other Title VI and ADA protections. Any individual who believes they have been denied meaningful access to CCRPC programs, services, or activities based on language may file a complaint. Complaints may be submitted electronically, by mail, or by phone and may be filed in the individual's preferred language.

All complaints will be reviewed and addressed in accordance with CCRPC's Title VI and ADA Complaint Procedures. CCRPC will make reasonable efforts to provide language assistance throughout the complaint process to ensure individuals can fully participate.

For more information on how to file a complaint, including access to the complaint form and detailed procedures, please visit: https://www.ccrpcvt.org/resources/title-vi-civil-rights/ccrpc-ada-complaint-procedures-and-form/

Contact

For language assistance or more information about this plan, please contact Emma Vaughn, Communications Manager. Email: evaughn@ccrpcvt.org, Phone: (802) 861-0114

Appendix A: Translation & Interpretation Resources

These appendices are intended as internal resources for CCRPC staff and may be updated administratively without approval from the CCRPC Board of Directors.

On-Demand Interpretation (Phone/Video) - All Languages

Propio Language Services | Provides on-demand interpretation and translation into over 350+ language, including on-demand American Sign Language interpretation.

- Website: https://one.propio-ls.com/login
- Access CCRPC Account: Log in using user code kbO0IE
- Video Interpretation: Start a call by selecting a language or use the "Propio Link" to add an interpreter to a virtual meeting.
- Phone Interpretation: Dial (802) 794-4131, enter account number 94766, and follow prompts to select a language.
- Advance Needed: On-demand available; pre-scheduling recommended for planned meetings.
- Pre-Scheduling: Submit form: https://propio.com/wp-content/uploads/2024/05/Virtual-Interpreter-Request-Form_Fillable.pdf or email scheduledopi@propio-ls.com
- Need Help? Contact Tom Schiffer (Tom.Schiffer@propio.com)

Language Link / Big Language Solutions | Provides on-demand interpretation and translation into over 300+ languages and dialects, including on-demand American Sign Language interpretation.

- Website: https://www.language.link
- Interpreter by Phone: Dial 800-535-7749, enter account number 33983#, and follow prompts.
- Interpreter by Video: Log in to InterpVault (https://ims.interpvault.com) using CCRPC credentials (stored in Keeper).
- Advance Needed: Not required for on-demand; scheduling recommended for planned meetings.
- Advance Needed: Not required for on-demand; scheduling recommended for planned meetings.
- Scheduling Policies: Cancellations within 48 hours and late arrivals (over 10 minutes) will be billed a 30-minute minimum or scheduled duration, whichever is longer
- Need Help? Contact Brian LeVene (brian.levene@language.link, 360-587-1501)

For hearing accommodations, use: Vermont Relay

- Vermont Relay provides free relay service, plus Relay Conference Captioning (RCC) for hybrid/virtual meetings. See Brochure on RCC for details on how to access services.

Planned In-Person Interpretation (Schedule in Advance)

AALV

- Website: aalv-vt.org
- Languages Offered: Amharic, Arabic, Bosnian, Burmese, Cantonese, Creole, Dari, Dinka, French, Hindi, Italian, Kibembe, Kirundi, Kiswahili (Swahili), Lingala, Mandarin, Nepali, Pashto, Russian, Somali, Spanish, Tibetan, Urdu, Vietnamese
- Fill out Form to Sign Up: https://www.aalv-vt.org/interpreter
- Advance Needed: 3 days for interpretation requests and 7 days for translation requests
- Turnaround Time: 24-48 hours
- Cost: $68/hour (as of January 2026)
- Need Help? Contact Jenny Taylor, Interpretation Services Lead Coordinator (alvinterpret@gmail.com, 802-777-1682)

CVOEO

- Website: https://www.cvoeo.org
- Languages Offered: Nepali, Lingala, Chinese/Mandarin, Spanish, Arabic, French, Swahili, Somali, Maay Maay, Thai, Bosnian, Russian, Portuguese, Bembe, Kirundi, Kinyarwanda, Dari, Pashto and more.
- Fill out Form to Sign Up: https://www.cvoeo.org/oreci-fee-for-service-program
- Advance Needed: 3 days for interpretation requests and 7 days for translation requests
- Turnaround Time: 24-48 hours
- Cost: $68/hour (as of January 2026)
- Need Help? Contact Shiferaw Gemeda, Associate Director of Racial Equity and Community Inclusion (sgemeda@cvoeo.org)

Other Providers:

- **Vermont Afghan Alliance** provides in-person interpretation for the languages Pashto and Dari. To learn more, email Drukhshan Farhad, the Program Officer, at Drukhshan@vtafghanalliance.org or Hamed Noorzai at Hamed@vtafghanalliance.org or call (802) 999-7182.
- **Vancro American Sign Language (ASL) Interpreting Services** provides in-person services including ASL and Tactile American Sign Language.
    - Email: interpretingservices@vancro.com
    - Online request form: https://vancroiis.com/request-interpreter.html
    - Need help? Contact Cory Brunner, Senior Vice President (cory.brunner@vancro.com)
- **U.S. Committee for Refugees and Immigrants (USCRI)** provides virtual and in-person interpretation services.
    - Email: requestinterpreterVT@uscrimail.org

- **Vermont Relay** provides free captioning service for hybrid meetings as an accommodation for people with hearing challenges called Relay Conference Captioning (RCC) for your conference calls, video meetings and webinars. See Brochure on RCC for details on how to access services.

Translation Services (Documents & Presentations)

Propio

- Website: https://one.propio-ls.com/login
- Access CCRPC Account: Log in using user code kbO0IE
- Translation Access: Select "Document Translation" on the left sidebar, then click "Log into Translation"
- Turnaround Time: Varies by document length and complexity
- Need Help? Contact Tom Schiffer (Tom.Schiffer@propio.com)

Language Link / Big Language Solutions

- Website: https://www.language.link
- Request Process: Send source files directly to Brian LeVene (brian.levene@language.link, 360-587-1501)
- Turnaround Time: 3–4 business days for smaller projects; 2–3 business weeks for larger projects
- Cost: Provided via quote based on project scope
- Need Help? Contact Brian LeVene (brian.levene@language.link, 360-587-1501)

AALV

- Website: aalv-vt.org
- Languages Offered: Amharic, Arabic, Bosnian, Burmese, Cantonese, Creole, Dari, Dinka, French, Hindi, Italian, Kibembe, Kirundi, Kiswahili (Swahili), Lingala, Mandarin, Nepali, Pashto, Russian, Somali, Spanish, Tibetan, Urdu, Vietnamese
- Fill out Form to Sign Up: https://www.aalv-vt.org/interpreter
- Advance Needed: 3 days for interpretation requests and 7 days for translation requests
- Turnaround Time: 24-48 hours
- Cost: depends on the word count, length and complexity of the document.
- Need Help? Contact Jenny Taylor, Interpretation Services Lead Coordinator (alvinterpret@gmail.com, 802-777-1682)

CVOEO

- Website: https://www.cvoeo.org

- Languages Offered: Nepali, Lingala, Chinese/Mandarin, Spanish, Arabic, French, Swahili, Somali, Maay Maay, Thai, Bosnian, Russian, Portuguese, Bembe, Kirundi, Kinyarwanda, Dari, Pashto and more.
- Fill out Form to Sign Up: https://www.cvoeo.org/oreci-fee-for-service-program
- Turnaround Time: depends on the word count, length and complexity of the document.
- Cost: $68/hour
- Need Help? Contact Shiferaw Gemeda, Associate Director of Racial Equity and Community Inclusion (sgemeda@cvoeo.org)

Other Providers:

- USCRI also provides translation services. To request translation, please email requestinterpreterVT@uscrimail.org
- The Vermont Association for the Blind and Visually Impaired offers Braille translation. To request translation, please email general@vabvi.org.
- Vancro, Inc. Provides Sign Language Interpretation of Recorded Media.
    - Email: interpretingservices@vancro.com
    - Media Services: https://vancroiis.com/services/media-services/
    - Need Help? Contact Cory Brunner, Senior Vice President (cory.brunner@vancro.com)

Video Translation Services

Custom multilingual videos have been identified as an effective tool where written translation and other methods may fall short in reaching individuals.

Vermont Language Justice Project

- About: The Vermont Language Justice Project supports people with language access needs and navigate everyday life by creating public service videos in 19 languages spoken in Vermont. Media is co-produced with trusted community members from Vermont's refugee, migrant, and immigrant communities. These messages are shared widely through YouTube, WhatsApp and with over 120 community partners.
- Website: https://www.vtlanguagejustice.org/
- Languages Offered: ASL, Arabic, Burmese, Bosnian, Dari, French, Haitian Creole, Jamaican Patios, Maay Maay, Mandarin Chinese, Nepali, Pashto, Portuguese, Somali, Spanish, Swahili, Tigrinya, Ukranian, and Vietnamese.
- Contact: If you want to create a multilingual video, reach out to Alison Segar, VLJP Executive Director (alison@vljp.org) or fill out an interest form online: https://www.vtlanguagejustice.org/contact
- Cost: After a brief meeting to understand your goals, audience, budget, and needs, VLJP will send you an estimate of the cost. Once you've accepted an estimate, VLJP will work with

you to write a script that is in plain, accessible language and is responsive to community needs.

Appendix B: "I Speak" Card

You can access this card on SharePoint here: CCRPC Language Access Card Apr2026.pdf