

CTPS Nondiscrimination Handbook

*Ensuring Access to the Transportation Planning Process for
Populations Protected under ADA and Title VI*

September 2014

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Chapter 1—Introduction

1.1 MPO NONDISCRIMINATION POLICY

The Boston Region Metropolitan Planning Organization (MPO) complies with Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and other federal and state nondiscrimination statutes and regulations in all programs and activities. The MPO does not discriminate on the basis of race, color, national origin, English proficiency, income, religious creed, ancestry, disability, age, gender, sexual orientation, gender identity or expression, or military service. As staff to the MPO, the Central Transportation Planning Staff (CTPS) complies with these nondiscrimination mandates when carrying out the work of the MPO.

One fundamental nondiscrimination requirement is that the MPO develop a formal statement that informs the public of their civil rights and remedies under the mandates described above. The MPO's "Notice to Beneficiaries" and a description of the process individuals may follow if they believe that they have been discriminated against in any MPO programs or activities is located in Appendix A. This information is also on the [MPO's website](#).

1.2 PURPOSE OF THIS HANDBOOK

This handbook describes how we comply with both Title VI (which prohibits discrimination on the basis of race, color, national origin, and limited English proficiency) and ADA (which prohibits discrimination on the basis of disability) to ensure that individuals protected under these statutes have the opportunity to participate fully in the transportation planning process. Here, staff may find information needed to interact with and inform the public—whether in the office, at outreach activities such as MPO and public meetings, and through all types of written materials and electronic communications.

1.3 CTPS NONDISCRIMINATION HANDBOOK DEFINITIONS

Below are definitions of terms used in this handbook that relate to civil rights requirements under ADA and Title VI.

Accessibility

This refers to document accessibility, or the various ways that CTPS and the Boston Region MPO accommodate the needs of persons with disabilities so that they can participate in the transportation planning work conducted by these organizations.

Accessible Format

An accessible format is a format that meets the needs of its user. For documents, that means a format that can be accessed by individuals who have low vision or who are blind. Text and documents that appear on a website are considered accessible when they can successfully interact with a screen reader for the blind or can be enlarged for individuals with low vision. Braille and audio recordings also are accessible formats for the visually impaired.

Accommodations

Accommodations are measures put in place to help overcome the problems created by a particular disability. For example, for an individual who has low vision, providing a large-print version of a document is an accommodation. For an individual who is hearing impaired, providing an assistive-listening device or a sign-language interpreter at a public meeting would be an accommodation.

Alternative Text

If a document that is posted online contains images—images include maps, tables, graphs, charts, and other types of figures and exhibits—that cannot be read by a screen reader, CTPS provides alternative text (also called “alt text”) that describes the image. A screen reader can read the alternative text to give the user a verbal description of what is represented in the image.

American Sign Language (ASL) Interpreter

An individual trained to facilitate communication between deaf American Sign Language users and hearing individuals via American Sign Language.

Americans with Disabilities Act (ADA)

ADA, enacted by Congress in 1990 and amended in 2009, is a civil rights law that prohibits discrimination in employment, access to government services, public accommodations, telecommunications, etc. on the basis of disability

Assistive-Listening Device (ALD)

An electronic device used by individuals who are hard of hearing to amplify sound. Though there are a number of types of assistive-listening devices, the ones primarily used by the MPO broadcast wirelessly over a frequency modulation (FM) frequency. The person who is listening may use a small FM receiver to tune into the signal and listen at his/her preferred volume. The MPO also owns a different type of ALD that can be used one-on-one or in small group settings.

Attendee

An individual attending a public meeting.

Braille

Braille is a [writing system](#) for [blind](#) and [visually impaired people](#), who use their sense of touch to read letters and other characters that are embossed as raised dots on paper. The number and arrangement of the dots differentiate letters and characters from.

Computer-Assisted Real-Time Transcription (CART)

A process whereby a trained operator uses a keyboard to transcribe spoken speech into written text. This may be done either on site or remotely using a voice connection such as a telephone, cell phone, or computer microphone to send the voice to the operator; and the real-time text is transmitted back over an internet connection. For meeting rooms without an internet connection, it is possible to establish connectivity via a WiFi router or wireless “hot spot.”

Clear Floor Space

The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.

Closed Captioning

A term that describes systems that display text on a television, computer or video screen in order to provide additional or interpretive information to viewers/listeners who wish to access it. Closed captions typically display a transcription of the audio portion of a program (either verbatim or edited), and sometimes include non-speech elements.

Descriptive Video/Described Narration

A feature that provides descriptive narration of key visual elements in the content of television programs, videos, films, and other visual media for people who are blind or visually impaired. Important visual elements that such viewer ordinarily would miss—actions, costumes, gestures, colors, scene changes, and so forth—are described by voice, thus engaging the visually impaired viewer with the story.

Disability

The Americans with Disabilities Act defines a “disability” as a physical or mental impairment that **substantially limits** one or more **major life activities**; having a record of such an impairment; or being regarded as having such an impairment.

Disabilities are generally caused by an accident, trauma, genetics, or disease. Examples of physical disabilities include impairments to a person’s mobility, hearing, vision, or speech. Examples of impairments that affect mental function are lower-than-normal intelligence, emotional illness, or some specific learning disabilities.

- **Major life activities** are the basic activities that the average person in the general population can perform with little or no difficulty, such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.
- **Substantial limits** prohibit or significantly restrict an individual in his or her ability to perform a major life activity compared to the ability of the average individual in the general population.

Discrimination

For the MPO or other public entities that receive federal funding, discrimination is defined as excluding specific individuals or groups of people from participating in, or denying benefits of, the services, programs, or activities of the entity.

Discrimination can be caused by intentional actions, or through actions (or inactions) that are not intended to discriminate, but which nonetheless have a discriminatory effect.

Four-Factor Analysis

The US Department of Transportation (DOT) outlines **four factors** that MPOs should consider to assess language needs and decide what steps they should take to ensure meaningful access for people with [limited English proficiency](#):

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- 2) The frequency with which LEP individuals come in contact with the program.
- 3) The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
- 4) The resources available to the MPO and the overall cost.

Analyzing these factors helps MPO staff determine the extent of language assistance needed to enable LEP individuals to participate in a program or activity. You can find more information about the four-factor analysis and assistance for LEP individuals in the MPO's [Language Assistance Plan](#).

Handicap

A handicap is a constraint that is imposed upon a person, regardless of whether that person has a disability. For example, stairs, narrow doorways, and curbs are handicaps imposed upon people who use wheelchairs. Handicaps also may result from negative attitudes toward those with disabilities.

Language Assistance Plan (LAP)

Under Title VI, MPOs are required to prepare a LAP that outlines the steps an MPO will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. The [four-factor analysis](#) is a basis for determining specifics of the LAP (Appendix B).

Large Print

To make a print document more easily read by individuals with low vision, the font size may be enlarged. The minimum acceptable size for large print is 16 point (Arial 12 point can be converted to 16 point if enlarged 134%). Because the appropriate font size varies according to the severity of the visual impairment, it is best to ask an individual what size is best for them before producing a large-print version of a document.

Limited English Proficiency (LEP)

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English may be classified as limited English proficient. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Minority

Minority persons include the following:

- 1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- 2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- 3) Black or African American, which refers to people with origins in any of the Black racial groups of Africa.
- 4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

National Origin

National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Path of Travel

A continuous, unobstructed way of pedestrian passage by means of which an area may be approached, entered, and exited.

Public Meeting

Any meeting open to the general public, hosted by or on behalf of the MPO, during which information is shared.

Reasonable Accommodation

A reasonable accommodation would not “fundamentally alter” the nature of the services, programs, or activities provided. Nor would it result in an “undue administrative or financial burden” for the agency. If a requested accommodation would result in a fundamental alteration or undue burden, the agency must take another action that would not be burdensome, but which nevertheless would ensure that individuals with disabilities receive the benefits and services of the program or activity.

Any reasonable service, aid, modification or adjustment to a meeting, materials, or documents, etc., that gives a person with a disability the opportunity to be an active participant in the meeting process.

Sans Serif Font

Serifs are the small lines tailing from the edges of letters and symbols in some fonts, such as **Times New Roman**. San serif fonts, like **Arial**, do not have these and are therefore easier for individuals with low vision and some types of learning disabilities to read.

**FIGURE 1.
Serif and San Serif Fonts**



Screen Reader

A screen reader is a software application used by individuals who cannot read the computer screen because of full or partial blindness, some types of learning disabilities, or illiteracy. The screen reader identifies what is displayed on the screen and “reads” it to the individual using audible text-to-speech translation, sound icons, or a Braille output device.

Styles

Microsoft Word allows the user to specify styles that automatically apply formatting to text elements in a document, such as headings, body text, and numbered and bulleted lists. Documents that are produced using styles are easier to make accessible using a screen reader, as they provide cues about the type of text that is being read. For example, if a “Heading 1” style is applied to a top-level heading in the document, the screen reader will indicate that the text being read is a top-level heading. Without styles, the screen reader will read all text continuously without giving the listener any idea about the level (heading levels, body text) of the text. In addition, the use of style elements in Microsoft Word creates the necessary tags needed by screen readers to navigate a document.

Template

A template is a master document that has built in styles that specify the text elements, fonts, and other formatting. When a document is created using a template, the desired styles can be easily and consistently applied so that all documents made with that template have a standard look.

TTY (Text Telephone)

A TTY is an electronic device for text communication via a telephone line, used when one or more of the parties has a hearing or speech-related disability. Public payphones equipped with TTY have a small keyboard that pulls out underneath the phone. Note: TTYs are gradually phasing out because of the increased use of voice and video relay.

Undue Burden

An accommodation would impose an undue burden on an agency if it resulted in “significant difficulty or expense.” The determination of an undue burden must be based on all resources available for use in the program for which accommodation is requested.

Wheeled Mobility Device

This refers to devices, such as wheelchairs (manual and motorized) and scooters, which are used by some individuals with physical disabilities to move through their environment. Non-traditional wheeled mobility devices may include Segways and bicycles.

Video Remote Interpreting

This refers to a contracted video service that allows individuals who are deaf to communicate via webcams and/or video phones with hearing people in real time, via a sign language interpreter.

Video and Telecommunication (Voice) Relay Services

Video Relay Service (VRS) is a form of Telecommunication Relay Service (TRS) that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through video equipment, rather than typed text. Video equipment links the VRS user with a TRS operator—called a communications assistant (CA)—so that the VRS user and the CA can see and communicate with each other in signed conversation. The VRS caller, using a television or a computer with a video camera device and a broadband (high-speed) internet connection, contacts a VRS CA, who is a qualified sign language interpreter. They communicate with each other in sign language through a video link. The VRS CA then places a telephone call to the party the VRS user wishes to call. The VRS CA relays the conversation back and forth between the parties—in sign language with the VRS user, and by voice with the called party. No typing or text is involved.

Telecommunications Relay Service (TRS) is a telephone service that allows persons with hearing or speech disabilities to place and receive telephone calls. TRS uses CA operators to facilitate telephone calls between people with hearing and speech disabilities and other individuals. A TRS call may be initiated by either a person with a hearing or speech disability, or a person without such disability. When a person with a hearing or speech disability initiates a TRS call, the person uses a teletypewriter (TTY) or other text input device to call the TRS relay center, and gives a CA the number of the party that he or she wants to call. The CA in turn places an outbound traditional voice call to that person. The CA then serves as a link for the call, relaying the text of the calling party in voice to the called party, and converting to text what the called party voices back to the calling party.

VRS and TRS are overseen by the Federal Communications Commission and private contractors who perform the intermediary communication service are reimbursed for this service.

Vital Document

Vital documents are ones that are necessary for access to essential services and that, if not translated, could result in discrimination on the basis of national origin. Vital documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Vital documents need to be translated into the primary languages identified for an area, based on the [LEP four-factor analysis](#).

Chapter 2—Accessible Document and Web Content Protocols

2.1 ABOUT ACCESSIBLE DOCUMENTS

For CTPS and the Boston Region MPO, document accessibility encompasses the various ways in which the needs of persons with disabilities are accommodated so that they can participate in the transportation planning work conducted by these organizations. In the case of an individual who has limited vision, an accessible document might be produced in a large-size, easy-to-read font (typically a [sans serif font](#)). In the case of an individual who is blind, an accessible document might be produced in Braille, be formatted to interact with a screen reader, or be read onto tape or compact disk (CD). The key to making the document and the information it conveys accessible is to provide an individual with the format that works best for him or her.

CTPS and the Boston Region MPO are endeavoring to make all documentation (both print and electronic) accessible to the public, including persons with disabilities. Federal laws require all subrecipients of federal funding to comply with a number of laws and regulations that require all documentation to be accessible. The Commonwealth of Massachusetts has adopted the federal requirements and included compliance in its own enterprise standards. In addition, the contracts that fund the work done by CTPS and the MPO require compliance with [Section 508 of the Federal Rehabilitation Act](#) (which governs electronic media and documentation).

2.2 VISUAL CHARACTERISTICS OF ACCESSIBLE DOCUMENTS

Documents are easier for individuals with low vision to read if they are created with a [sans serif font](#) and minimal [use of all caps, small caps, and italics](#). In addition, [if background and/or text shading or colors are used](#), there should be a high contrast between the text and the background.

- Print documents are made accessible by enlarging them for easier reading by individuals with low vision.
- Documents on the MPO website are posted in both PDF and HTML formats. Individuals with low vision can enlarge both of these formats on their screen for easier viewing. In addition, HTML documents (and to some degree PDFs) can be read by a screen reader for people who cannot see the screen.

2.3 POLICIES AND PROCEDURES

2.3.1 All CTPS Documents Need to Be Made Accessible

Except those that will be used only for internal purposes, all documents should be accessible. Although documents that are for internal use only (that is, documents that will not be sent to a recipient outside of CTPS and will not appear on the website) do not technically need to be accessible, authors should get in the habit of making every document accessible by starting with a CTPS [template](#), as it may save time and effort in the long run.

2.3.2 Documents in Large-Print, Braille, or Audio Recording

In general, documents only need to be produced in these formats in response to a specific request through which the individual can specify their particular needs in terms of accessibility.

2.3.3 Large-print Versions of Handouts at Meetings

All public meeting notices must inform potential attendees that, if they wish to receive handouts in accessible formats at the meeting, they should contact CTPS in advance to inform us of their specific needs. It is, therefore, not necessary to create large-print versions of all meeting handouts. However, if there is a reasonable expectation that someone attending the meeting will need a large-print version, you can produce copies that meet the [minimum acceptable size for large print](#) (Arial 16 point). If this is not sufficient, the individual can let you know, and, if possible, you can enlarge the document for them at that time, or you can send it to them after the meeting.

2.3.4 Making Print Documents Accessible

The CTPS [document templates](#) have been created so that the print version of a document can be easily enlarged to the minimum acceptable size for large print, or larger (Arial 12 point can be converted to 16 point if enlarged 134%).

2.3.5 Updating and Publishing Legacy Documents

- **Approach 1:** If the document was created using Word styles and, in particular, if document headings were formatted using Word's heading styles, it may be easiest to import the current CTPS template styles into the document. Instructions for Using Styles from CTPS Templates in Other Documents are available on the CTPS intranet site. Bear in mind that this approach still requires manual re-creation of page-level formatting such as margins, headers, and footers. In reports especially, headers and footers can be quite complex to set up properly, so the second approach, below, may turn out to be easier.
- **Approach 2:** Copy and paste the text of your original document into the appropriate template. After you have finished pasting in the text, you

should position the cursor inside each paragraph (it is not necessary to highlight the entire paragraph) and apply the appropriate style from the template document styles.

2.3.6 Making Documents for the MPO Website Accessible

For all documents that will be posted to the MPO website, you must use one of the CTPS [document templates](#) to create your document. Embedded in each template are instructions for all of the steps that you, the author, need to follow to ensure that your document can be made accessible. If your document will be posted on the MPO's website, follow the instructions in the [Accessible Document Production Process: Flowchart](#) and the [Work Scope Development and Accessible Document Production Process: Flowchart](#).

2.3.7 Posting Nonaccessible Documents to the MPO Website

It is our policy not to post documents from other sources that cannot be made accessible. If requested to do so, we will work with the client to provide guidance on how they can make their documents accessible.

Sometimes documents from other sources that are not accessible will be presented and discussed at an MPO meeting. In such cases, the documents will not be posted on the MPO's website. They will be sent via email to MPO members for their review before the meeting and will, if requested, be enlarged for individuals who may be attending the MPO meeting.

2.4 ROLES AND RESPONSIBILITIES

2.4.1 Author's Role in Creating Accessible Documents

All authors must follow the procedures that will ensure that all of their documents can be made accessible. ***This includes all content—text, alternative text, images, maps, tables, graphs, charts, figures, and exhibits.***

For additional information on creating accessible documents, please see the [Purpose, Methods, and Responsibilities: Memo from Executive Director](#), the [Accessible Document Production Process: Flowchart](#), and the [Work Scope Development and Accessible Document Production Process: Flowchart](#).

2.4.2 Editorial Group's Role in Creating Accessible Documents

During the editing process, Editorial staff review each document to check for the proper application of styles. If only a few problems are found, editors will make the corrections. However, if the editor finds that the author has not applied styles correctly throughout a document, the editor will ask the author to correct the problem(s) in the original source document.

Although authors are encouraged to write the alternative text for images, Editorial will do so if the author prefers.

2.4.3 Graphics' Role in Creating Accessible Documents

The Graphics staff is responsible for producing accessible versions of the properly prepared documents provided to them by CTPS authors. The Graphics staff reviews each document to check for the proper placement of tables, maps, figures, and exhibits prior to converting the document into PDF and HTML files.

For additional information on creating accessible documents, please see the [Purpose, Methods, and Responsibilities: Memo from Executive Director](#), the [Accessible Document Production Process: Flowchart](#), and the [Work Scope Development and Accessible Document Production Process: Flowchart](#).

2.4.4 Charging Your Time When Preparing Accessible Documents

Editing an accessible document, including all associated alternative text for describing images, maps, tables, graphs, charts, figures, and exhibits will be charged to the project budget. The Graphics staff will charge its post-document-production accessibility work to a specified budget other than the project budget.

2.5 CREATING ACCESSIBLE DOCUMENTS USING TEMPLATES AND STYLES

2.5.1 Always Use Templates to Create Accessible Documents

Authors should *always* use one of the [CTPS templates](#) that have been developed for the various kinds of documents produced by CTPS. The templates contain specific styles and other formatting that is necessary for creating documents that can be made accessible.

The templates incorporate all of the CTPS standards—both for accessibility and for appearance and content. Instructions and other helpful hints and comments appear within each template.

While every effort has been made to perfect the templates and automate various processes for the author, *the author still must utilize the templates correctly*. If you need help using the templates, please see Editorial.

2.5.2 Location of Templates

The templates can be found on the [CTPS intranet site](#) under Templates/Forms: Documents and Graphics. Document templates appear alphabetically on that page.

2.5.3 Always Download a New Template from the Intranet

Each time you start a new document, you should download the appropriate template from the “Documents and Graphics” page on the CTPS intranet site, as the templates continue to be refined. Downloading the template before you begin will ensure that you are using the latest version.

2.5.4 Considering Visual Elements in Your Publications

You should always ask the Graphics staff, preferably before you begin your work, to give you advice on the color combinations that are visually appealing and provide the correct amount of contrast for individuals with low vision.

2.5.5 Use of Fonts

The CTPS templates use Arial for body text and Trebuchet for headings, as they are both [sans serif fonts](#) that are widely available across platforms and by most web browsers. You are not necessarily limited only to the use of these fonts; however, at the very least, you should consult with Graphics staff before using other fonts; they are best equipped to advise you about the availability of your desired fonts to all readers, as well as how the fonts fit within the established “look” of CTPS documents. Because CTPS templates are designed to save you time in the long run, it is advisable to start with them, even if you will be modifying the fonts they use.

2.5.6 Use of ALL CAPS or *Italics*

For individual words or short phrases, all caps, small caps, and italics can be used. However, for large chunks of text, it is preferable not to use them, as they are more difficult for individuals with low vision or certain types of learning disabilities to read.

2.5.7 Do Not Use Multiple Columns in Text

Using multiple columns does not adhere to accessibility criteria.

2.5.8 Orientation of Text on a Page

In general, text should be oriented parallel to the top of a page unless it is rotated for aesthetic purposes. However, column headings in a table may be rotated sideways (that is, turned 90 degrees counterclockwise) if necessary to make the table fit on the page.

2.5.9 Using Styles that Are Not in the Template

Examples of this include multilevel lists, and different numbering styles. Word lists are a bear to work with—very touchy indeed. It is recommended that you seek the help of IT&S staff if you need to add a style for a bulleted or numbered list. If you want to [change the appearance of other types of text](#), you should be able to [modify or add to the template’s Word styles yourself](#).

2.5.10 Some Documents Cannot Be Made Fully Accessible

As illustrated by the following examples, when faced with a document that cannot be made fully accessible, we will determine and use the next best alternative in terms of accessibility. If you have questions about specific documents and whether and how they can be made accessible, please consult with the Deputy Director or Director of Policy and Planning.

- **TIP Tables:** Currently the TIP tables must conform to formatting that is defined by MassDOT. This formatting is not fully accessible or navigable by screen readers. Because CTPS cannot change this formatting, we have developed a way to add alternative text in the first cell of the table that cannot be seen by sighted individuals, but that can be read by a screen reader.
- **Gantt Charts:** Microsoft Project Gantt charts cannot be made accessible, nor can the text in a Gantt chart be exported in an accessible way to PDF or HTML. However, an accessible table can be produced from the Gantt chart and referenced by it.
- **Some Forms:** Sometimes a form that the MPO is required to use by a federal agency cannot be made accessible (for example, the FTA Title VI Certifications and Assurances form). When this is the case, the text of the document in which the form appears should inform the reader that the form is not accessible and provide the reader with instructions regarding who they can contact for assistance.

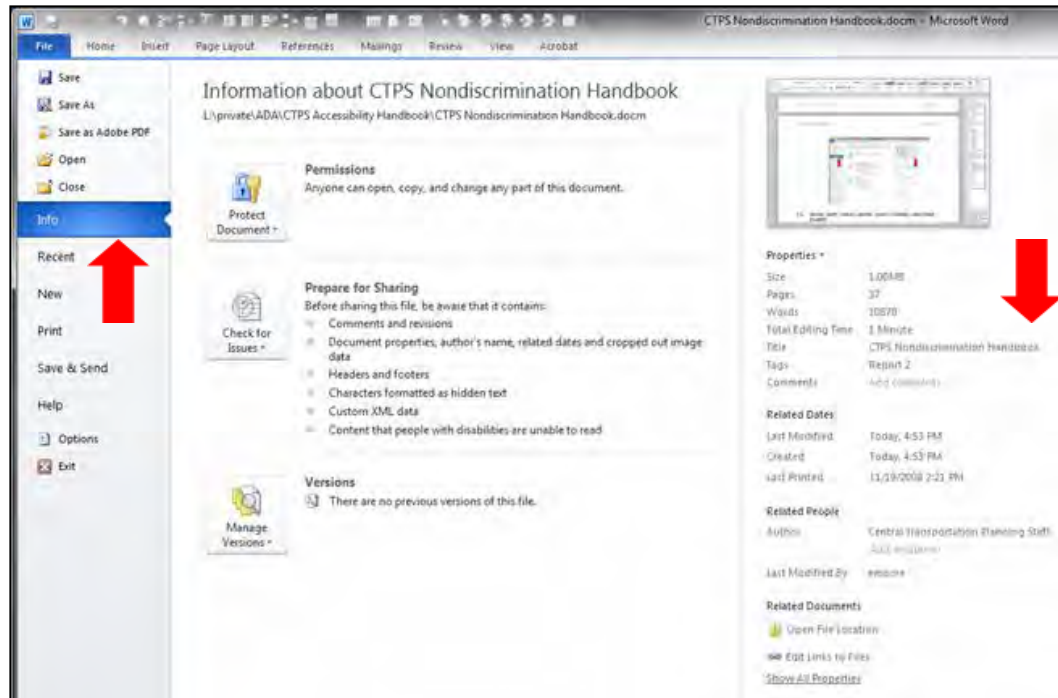
2.5.11 Making Special Formatting Accessible

Examples include a long quote that is indented at both margins and a paragraph with a hanging indent. Styles may be added to Word documents by authors who need formatting that is particular to their document. For example, if you have evaluated multiple intersections for a report and include a recommendation for each intersection styled as a hanging-indent paragraph in italics, you may create a new style to help in formatting each occurrence. (However, you should first consider whether your repeated element can be implemented with one of the heading levels available in the templates.) Although the new style will aid comprehension for sighted readers, authors should be aware that screen-reading software will not distinguish between the new style and plain text, so accessibility will not be improved for non-sighted readers. Therefore, don't rely solely on visual formatting to convey the context of content in your document. Spell out the context in the document's text. In the example given above, "Recommendation:" could precede each recommendation. A long quote could be introduced as such ("...according to the following extract from the *MUTCD*:").

2.5.12 Specific Aspects of a Document That Ensure it is Accessible

All headings and lists (numbered and bulleted) must be designated as such by applying the specified Word style so that the screen reader announces them appropriately. In addition, all embedded graphics that are not purely decorative should have alternative text so that the screen reader can announce the function and purpose of the graphics. Tables should follow [table guidelines](#) so that the screen reader can read the applicable column and row headings of any cell in the tables. Finally, the title of the document should be copied from the visible text of the document and entered in the document properties—found under the "Info" section of the "File" tab, as shown in the figure below—so that the screen reader can properly announce the document title. If you follow the instructions provided in the document templates carefully, all these aspects will be correctly addressed.

FIGURE 2.
Document Title in Document Properties



2.6 IMAGES, MAPS, TABLES, GRAPHS, CHARTS, FIGURES, AND OTHER EXHIBITS

2.6.1 Making Images Accessible

For simplicity, the word “image” will be used for all of the categories cited above. Some [simple tables](#) can be read by a screen reader; however, when using most images in an accessible document, alternative text must be supplied for each image ***unless the image is merely decorative or the text of the main document fully describes the image or, in the case of tables, if the table is***

small enough that its description would include much of the content or would seem redundant. Screen-reader software generally announces the presence of any image and reads aloud accompanying alternative text (which is invisible to the sighted reader) to convey the purpose and/or content of the image.

2.6.2 How to Write Alternative Text

In general, alternative text should:

- ***Avoid redundancy:*** Do not repeat an image title or caption (assuming that it is in Word and occurs above the table or figure), or other nearby text that already describes at least part of the purpose of the image.
- ***Be succinct:*** Omit extraneous information that is not needed to convey the purpose of showing the image. If the author believes that the image needs a long explanation (more than 20 words), the explanation should be in the text of the main document.
- ***Convey in words the same information that is communicated by the image:*** Think of the alternative text as a replacement of the image rather than simply a description of its appearance. The alternative text should represent the purpose and function of the image in the context of the document. It should cite what this image says and why it is important.

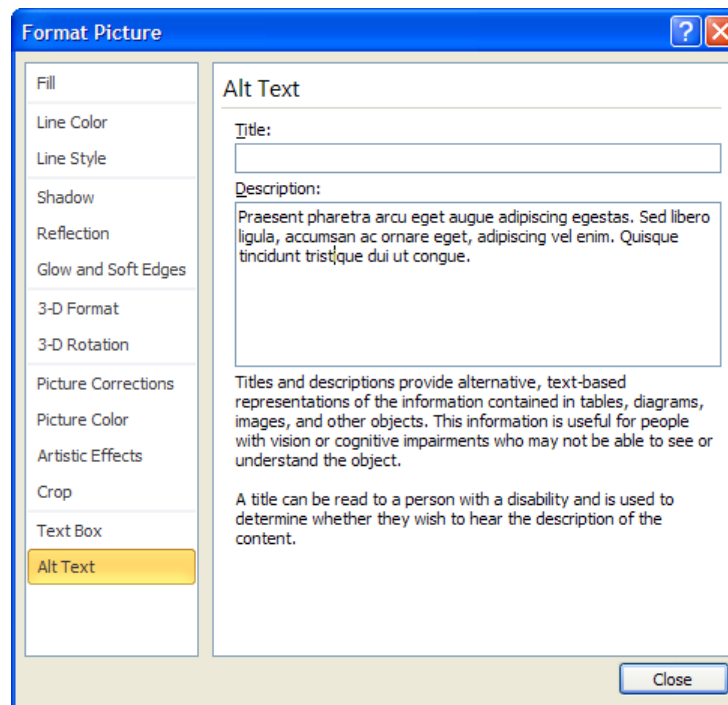
For example, an image may be used to illustrate the growth in population over a decade. The main document text may state: “Below is a chart illustrating the growth in population over the last decade. It shows that there has been an annual increase of 3% during the first five years, while the second half of the decade had lower growth, at 1% per year.” If the main text does not include this information, it must be provided as alternative text.

- ***Describe the general organization of a table:*** For example: “The MPO town at the beginning of each row is followed by columns of population and employment data.”

2.6.3 Specifying Alternative Text for Images and Tables in MS Word

In Microsoft Word, alternative text can be inserted by right-clicking on the image or table, selecting “Format Picture” or “Table Properties” or “Object Properties,” respectively, choosing the “Alt Text” tab in the dialog box, and then entering the alternative text in the “Description” box provided (shown in the figure below).

FIGURE 2.
Alt Text Dialog Box



2.6.4 Alternative Text for Decorative Images

Alternative text should be provided for all images. If the image is decorative only, the alternative text can be a null value or it can be a simple description such as “Photograph of an Orange Line train.” You should consult with Graphics if you are unsure about what is needed.

2.6.5 Inserting Alternative Text for Images That Are NOT in a Word Document, but Will Be Added to the PDF

If the images requiring alternative text are to be inserted in a Word document by Graphics staff rather than by the author, the author should enter the images’ alternative text in the main document text following the images’ placeholders.

If the images requiring alternative text will not be inserted into a Word document, but will be inserted into the PDF file (such as a full-page map or table), the author should place the alternative text on a blank page within the Word document where the image will be inserted. The author also should provide the name of the file that is associated with the alternative text.

Alternative text is a very important part of making a document accessible. Consult the Graphics staff if you need help using Microsoft Word to insert

alternative text. For more guidance on writing alternative text, please speak to Editorial. You can find additional information on the [WebAIM website](#).

2.6.6 How to Create Tables for a Screen Reader

Screen readers read tables in rows from left to right and then from top to bottom, reading the text as if no cell boundaries are present. Listeners will be disoriented if rows do not contain equal numbers of columns (as happens if some cells have been merged) or if some cells are empty (screen readers do not pause for empty cells or announce them). Therefore you should try to make your table a simple grid, with equal numbers of columns in each row and equal numbers of rows in each column. You also should supply content for each cell. If it is very important for visual clarity to leave some cells blank, consult Graphics staff for techniques to meet both demands simultaneously.

Graphics staff will make simple grid tables both readable **and navigable**; that is, the screen-reading software will be able to identify, on demand, the applicable column and row headings for any cell in the table, in addition to reading the contents of all rows sequentially. The table below can be prepared easily for navigation by individuals using screen-reading software.

TABLE 1.
Example of a Table that is Accessible to a Screen Reader

Travel Mode	No-Build	Alternative 1	Alternative 2	Alternative 3
Automobile	8,277	8,878	8,770	8,579
MBTA bus	753	566	1,254	1,001
Rapid transit	650	879	708	889
Commuter rail	n/a	N/A	101	99
Total	9,680	10,323	10,833	10,568

N/A = Not applicable or available.

The most common use for merged cells within tables is to create multilevel row or column heads to avoid repeating information that is common to several them. The table below extracts words common to the last four column heads and places them in a single merged cell spanning four columns. For tables to be accessible it is preferable **not** to do this but instead to ensure that each row or column head is fully contained within one cell for each row or column.

TABLE 2.
Example of a Table that is NOT Accessible to a Screen Reader

Travel Mode	No-Build Trips	Alternative 1 Trips	Alternative 2 Trips	Alternative 3 Trips	Alternative 3 B			
					Trips	Mode Share	User's Cost/Mile	Emissions of X
Automobile	8,278	8,878	8,579	8,579	6,186	92.5%	\$2.50	5.25 kg
MBTA bus	753	566	1,001	1,001	1,049	4.5%	\$0.25	1.00 kg
Rapid transit	650	879	889	889	1,014	1.5%	\$0.50	.75 kg
Commuter rail	na	na	101	101	99	0.5%	\$0.75	.90 kg
Total/Avg.	9,681	10,323	10,570	10,570	7,334	100.0%	\$1.00	9.15 kg

Another use of merged cells is in “category” header rows. For example, a table showing demographic information for the towns in the Boston Region MPO area might group the towns by subregion and include a row above each group of town names announcing the name of the subregion in a single merged cell. This construction is also very difficult to make accessible. Instead, consider breaking the table into separate tables, one for each group or category, with table titles adjusted accordingly. If you have any difficulty figuring out how to break complex tables into simple ones, you can seek help from the Graphics staff.

Complete instructions for creating accessible tables can be found at the end of this chapter.

2.6.7 Exhibit Tables in Work Scopes Do Not Require Alternative Text

Tables that are automatically generated from the CTPS work scope [exhibit builder tool](#) are accessible for use with a screen reader and do not need alternative text.

2.6.8 Using Borders and Other Visual Separation Aids in Tables

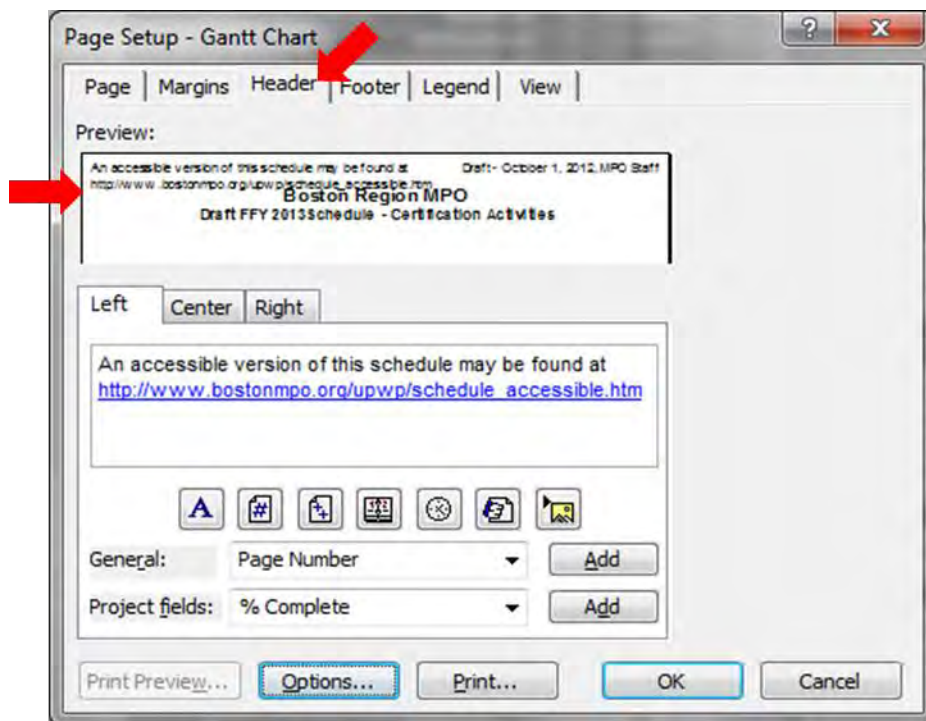
When you judge that the reader will need help in not losing track of a row, you may need to give the rows horizontal borders, provide more space between the rows, or shade every other row. You should not insert blank rows or columns to add spaces between rows and columns, respectively, as doing so causes problems for the screen reader.

Vertical borders should be used only when you think the reader would have trouble grasping the organization of the table without them. If it is at all possible, avoid the use vertical borders to provide separation between columns of data that are too close together. Instead, reformat the table to solve the problem. For more information regarding the formatting of tables, see the “Documents and Graphics” page on the [CTPS intranet site](#).

2.6.9 How to Make a Microsoft Gantt Chart Accessible

If you have any tasks or activities in the project that occur on single days (for example, a recurring meeting), edit the task description to summarize that schedule with words (e.g., "RTAC meetings monthly on the second Monday"). Then use your mouse to highlight the first three columns of the chart (the task description column, the start date column, and the end date column) for all of the task rows. Copy the highlighted cells and paste them into a Word document as a table. The Word document can be further edited to adjust the formatting and to add any necessary title or other text. Then it should be converted by Graphics into HTML. In the page header of the Microsoft Gantt chart, add text that explains that a fully accessible version of the schedule is available and provides the URL of the HTML page that Graphics created. Microsoft Project will automatically make the URL an active link.

FIGURE 4.
Gantt Chart Page Header



2.6.10 Formatting Maps

In general, you should use the same fonts and point sizes for any text on a map that you would use for the text portion of a Word document. However, if 12-point Arial is too large to fit on the map, you should use the largest size that will fit. When doing so, you should try to make any thematic text (that is, the text that is most important to the purpose of the map) as large as possible, while placing less emphasis on the background or reference text (for example, the names of municipalities). A map's legend should always be oriented parallel to the top and

bottom of the map (i.e., parallel to the title box.) The “Documents and Graphics” page on the [CTPS intranet site](#) also has instructions for producing maps, including:

- Standards and Procedures
- Graphics and Mapping: Dos and Don'ts
- ArcGIS Templates
- Frames for Full-Page Figures (including maps) in PowerPoint

2.7 POSTING DOCUMENTS TO THE MPO WEBSITE

2.7.1 Getting Your Documents to the Right Place

As indicated on the [Accessible Document Production Process: Flowchart](#) and the [Work Scope Development and Accessible Document Production Process: Flowchart](#), you should move your document into the prescribed folder on the network and then email all Graphics staff to alert them that the document is in the folder.

2.7.2 The Process for Posting Documents

Once documents have been converted to HTML and PDF and verified for accessibility by Graphics staff, the Certification Activities staff has the responsibility of posting documents that are associated with specific MPO meetings. For documents that are posted on the MPO website under “MPO/CTPS Reports,” the author should notify IT&S staff when the document is available for posting. For more details, see the [Accessible Document Production Process: Flowchart](#) and the [Work Scope Development and Accessible Document Production Process: Flowchart](#).

2.8 MISCELLANEOUS

These guidelines are intended to be as generally helpful as possible for staff members facing the task of preparing their work to be made accessible. Please contact the CTPS Director of Policy and Planning to suggest inclusion of any additional accessibility-related materials.

2.9 CTPS ACCESSIBLE DOCUMENT PRODUCTION PROCESS

The following process should be followed for all CTPS-produced documents (other than work scopes*) that will be posted for an MPO meeting or anywhere on the MPO website.

ACTION	Description	Action Completed No Later Than:
ALERT GRAPHICS	Author emails ALL Graphics staff that a document will be available soon.	When document is sent to editing
GET DOCUMENT ON MPO AGENDA	Document approved for placement on MPO agenda at agenda-setting meeting (if applicable). Author should alert Karl and Certification Activities staff, the week before the agenda-setting meeting, that he or she wishes to have the scope on the agenda.**	8 full business days prior to MPO meeting†
PLACE SCOPE IN FOLDER	Author PLACES COMPLETED, APPROVED, AND EDITED DOCUMENT (In MS Word) in the appropriate sub-folder (e.g., Memo, Report) under \\liliput\groups\Editing\Document_processing\	7 full business days prior to MPO meeting or desired posting date‡
NOTIFY GRAPHICS	Author emails ALL Graphics staff when document has been placed in the appropriate sub-folder, noting date of MPO meeting.	7 full business days prior to MPO meeting or desired posting date‡
CREATE PDF & HTML DOC.	Graphics staff CREATES PDF and HTML versions of document and VERIFIES accessibility.‡	6-7 full business days prior to MPO meeting or desired posting date‡
PLACE & NOTIFY	Graphics staff PLACES PDF and HTML versions in \\liliput\groups\Editing\Document_processing\appropriate sub-folder\ Accessible_HTML_PDF. Graphics staff NOTIFIES appropriate party§ that document is ready for website.	5 full business days prior to MPO meeting or desired posting date‡
PLACE ON WEBSITE	Appropriate party§ PLACES PDF and HTML versions of the document on website (and deletes the PDF and HTML files from the "Accessible_HTML_PDF" sub-folder).	5 full business days prior to MPO meeting or desired posting date‡
SEND CONFIRMATION	Appropriate party§ emails a CONFIRMATION to author and Graphics that document has been posted.	5 full business days prior to MPO meeting or desired posting date‡

* For work scopes, please refer to the "CTPS Work Scope Development and Accessible Document Production Process" flowchart.

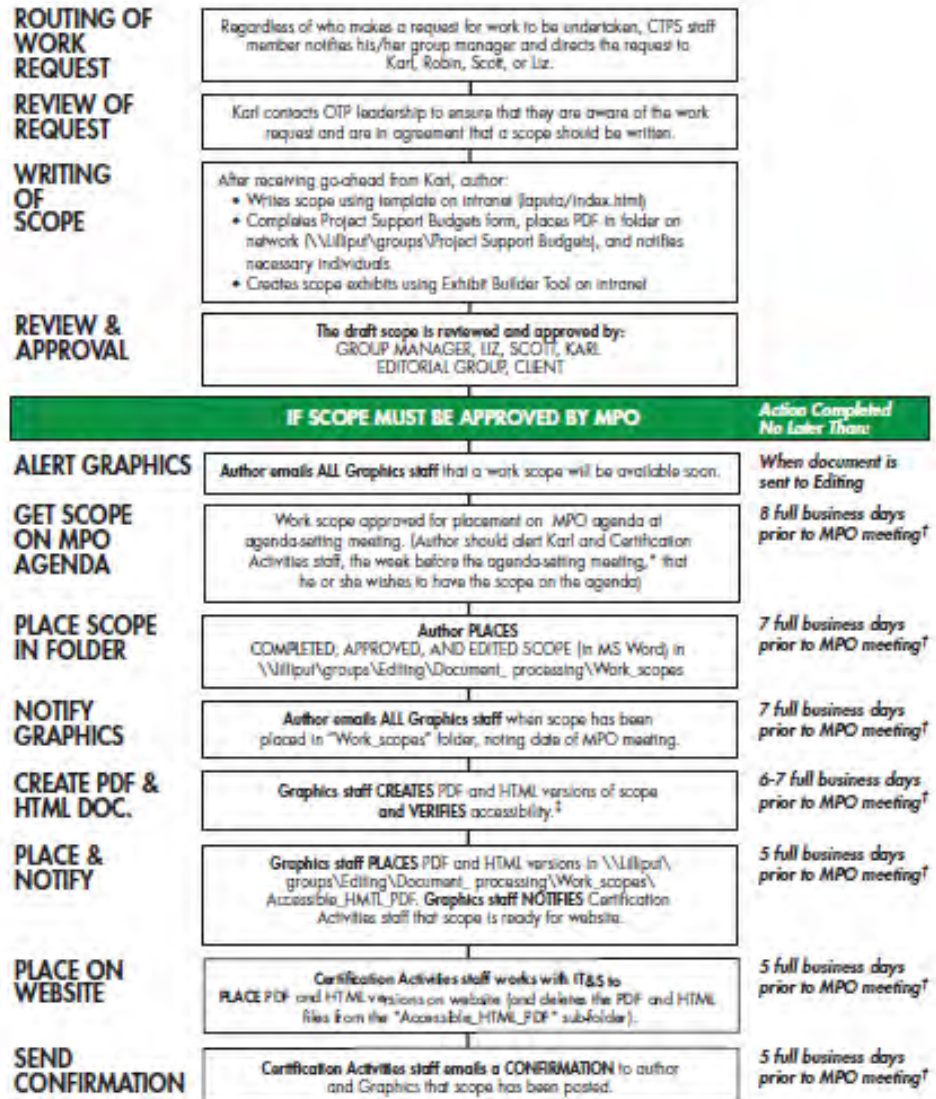
**The agenda-setting meeting is generally held on the Monday of the week preceding the week of the MPO meeting.

† Example: If the MPO meeting is held on the morning of Thursday, September 20, "8 full business days prior" starts at the beginning of the day on Monday, September 10.

‡ After Graphics staff create the PDF and the HTML versions of the document, they place the author's original document in the "Post_process_originals" sub-folder under \\liliput\groups\Editing\Document_processing\appropriate sub-folder).

§ For documents associated with MPO meetings, this refers to Certification Activities staff. For all other documents, this refers to IT&S staff (Ben or Mark)

2.10 CTPS WORK SCOPE DEVELOPMENT AND ACCESSIBLE-DOCUMENT PRODUCTION PROCESS



Action Completed No Later Than

When document is sent to Editing

8 full business days prior to MPO meeting†

7 full business days prior to MPO meeting†

7 full business days prior to MPO meeting†

6-7 full business days prior to MPO meeting†

5 full business days prior to MPO meeting†

5 full business days prior to MPO meeting†

5 full business days prior to MPO meeting†

* The agenda-setting meeting is generally held on the Monday of the week preceding the week of the MPO meeting.
 † Example: If the MPO meeting is held on the morning of Thursday, September 20, "8 full business days prior" starts at the beginning of the day on Monday, September 10.
 ‡ After Graphics staff create the PDF and HTML versions of the scope, they place the author's original document in the "Post_process_originals" sub-folder under \\Lilliput\groups\Editing\Document_processing\Work_scopes\.

2.11 TABLE FORMATTING—PRODUCING TABLES THAT MEET BOTH ACCESSIBILITY AND CTPS DESIGN STANDARDS

INTRODUCTION

WHY TABLES?

At CTPS, we use tables to present large amounts of technical data. By arranging data in coherent groupings, tables can communicate complicated ideas simply. Tables can act as ordered lists—storage for data. Often they can explain, compare, and clarify concepts in a smaller space than can words alone. Some CTPS products will contain no tables at all, while others will employ tables heavily. This is natural; tables may not be needed in a memo that primarily discusses policy issues, for example, which are best communicated through words. The general idea is to choose a blend of communication that uses both tabular and narrative information to their best advantage.

TABLES ARE INHERENTLY VISUAL

Every reader absorbs information differently; some prefer it communicated through text and others through tables. When we are trying to digest content rapidly, we scan material. We use our eyes to scan tables differently than we scan text. By their nature, tables are a visual medium; they rely on layout to enhance comprehension of their contents. But what if the reader is blind or has low vision? Section 508 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990 require that all federal agencies and federal-funding recipients give people with disabilities access to information that is comparable to the access available to others—unless it presents an undue burden for an agency.

The Boston Region MPO and CTPS are committed to both the letter and spirit of this mandate.¹ Because the majority of our products are read electronically on the Web, we are dedicated to making all of our information accessible to people who are blind or have low vision, providing them with “reasonable accommodation,” per the ADA. Further, since CTPS strongly believes that this is the right and just thing to do, we expect our authors to participate in our dedication to accessibility.

CTPS TABLE TEMPLATES

The CTPS accessibility committee has defined conventions for tables that ensure they can be fully described and navigated by current “screen readers”—applications that audibly read the material to blind users in an artificial voice.

These conventions are described in this document and incorporated into the CTPS table templates, which are located at http://laputa/new_site/standards/requirements_and_templates.html for your convenience.

Please create your tables in Excel using one of the CTPS table templates, and import them into a Word document using the preferred method described in [Appendix A](#) of this document.

¹ [Krepp, Ben. TRB paper submission, CTPS, 2013.](#)

TYPES OF TABLES

There are as many ways of constructing tables as there are authors and ideas. This document cannot cover every possible type of table because their formats depend upon the content, the audience, the type of written product, and the author's imagination. The possibilities for presenting information visually are boundless! So, for the purpose of this document, we are going to refer broadly to "simple" and "complex" tables.

Simple Tables

- Simple tables are ones that present data in a completely uniform grid, with only one row of column heads (the top row in the table) and only one column of row heads (the first column in the table), and with no merged cells or subsections.
- Simple tables can easily be made accessible.
- They are preferable to complex tables because it is easier to make simple tables fully navigable for a screen reader.
- Therefore, authors should make every effort to present data in a simple table format.
- Examples of formatting for simple tables are presented in [Appendix B](#) at the end of this document.

Complex Tables

- In short, complex tables are more complicated than the examples shown in Appendix B.
- Unlike simple tables, complex tables may have rows that are organized in multiple sections (each with a row section head) and/or multiple columns (each with a column head) grouped under one common column section head (in a merged cell).
- Although complex tables are not CTPS's preferred mode for accessibility, sometimes they are necessary in order to present material in an understandable and effective way.
- If an author believes that her/his content would lose impact by organizing it in a simple table format, s/he should seek guidance on the various options available.
- It is an author's responsibility to consult with Graphics staff in the early stages of formatting their complex tables for tips on making them as accessible as possible.

THESE GUIDELINES

While the guidelines herein are agreed upon and preferred for all CTPS documents, they do not cover all conditions in every instance and, depending upon the content and product, some exceptions may be made. If you do not see a topic covered here, or are wondering how to handle a specific or unusual situation, please consult with the Graphics or Editorial group.

FORMATTING CONVENTIONS

II.1 ACRONYMS/ABBREVIATIONS

- All acronyms and abbreviations used in table should be defined below the table, on a separate line in the [citation area](#).
- Arrange alphabetically, separate with period.
- For example: FFY = federal fiscal year. mph = miles per hour. N/A = not applicable or available.

II.2 ALIGNMENT

Placement of table on page:

- Center horizontally

Column Heads:

- Vertically aligned at the bottom of cell (whether or not text in column head wraps)

Columns of numbers, including column head:

- Right align

Columns of text, including column head:

- Left align

Columns of mixed text and numbers:

- Right align

Row Heads (far left column):

- Left align
- If more than one line, use a hanging indent

In rows:

- If only the row head has multiline contents, bottom align
- If cells other than the row head have multiline contents, top align

When text is rotated vertically within cell:

- Left align

II.3 BOLD TYPEFACE

The following components should always be in bold type:

- Column heads
- Total rows
- Table titles

Bold text can also be used to emphasize the contents of a cell

II.4 BORDERS

General:

- “Borders” are any lines in a table
- Use the Borders function to create them
- Never use underscore or underline functions

Vertical borders:

- Try to avoid
- May use when making visual statement
- Or, to provide separation between columns of data that must be very close together
- Or, if they would help reader grasp organization of table

Thickness of borders:

- In general, use default one-point lines for borders (select thinnest border option in Excel)

Continuous-border style:

FORMATTING CONVENTIONS

- Use above and beneath column heads, above totals, and at bottom of table
 - Use continuous borders, not partial borders
 - Subsections of a table may be divided by horizontal borders
-

II.5 CAPITALIZATION

In column heads:

- Capitalize Like the Title of a Book, as in This Sentence.

In row heads:

- Capitalize only first letter of first word.
-

II.6 CITATION AREA

- This is the area below and on the outside of table.
 - Information in citation area of table should be two points smaller than point size of table body. For example, if a table is displayed in Arial 12 point, then the footnotes, definitions, source, etc. should be in Arial 10 point, etc.
 - Left aligned with hanging indent; do not skip any lines.
 - The order of citations is, each on its own line:
 - i Note(s) (A “note” is a comment that applies to the entire table.)
 - ii Footnotes (A “footnote” applies only to a specific element in a table.)
 - iii Acronyms
 - iv Source
-

II.7 COLUMN HEADS

- Column heads contain text at the top of a column, which defines the data in the column
 - They are bold
 - [See Alignment above](#)
-

II.8 COLUMN WIDTHS

Columns with the Same Category of Data:

- For example, a group of columns all giving numbers of trips under various scenarios
- Widths should be equal

Columns with Varying Types of Data:

- Do not need to have equal widths
-

II.9 CONSISTENCY

- Format should be consistent within each table and from table to table within a document.
-

II.10 EMPTY CELLS

- Empty cells are not audibly signaled by a screen reader, so can lead people using screen-reading software to lose their place in the table.
 - Therefore, all cells should have something in them. For data cells, you can use a zero, N/A, or em dash (use the Special Character tab in the Insert Symbol dialog box)
 - However, for sighted people, empty cells can sometimes aid comprehension of the table as a whole.
 - To solve this problem, you can put text, symbols, or numbers formatted in the same color as the table background (usually white) in the “empty” cells.
 - For column and row heads, you can use “no heading.”
 - For data cells, use a zero, N/A, or em dash (use the Special Character tab in the Insert Symbol dialog box)
-

II.11 FONT AND POINT SIZE

- Arial 12 point in the body of table; Arial 10 point in [citation area](#)
-

FORMATTING CONVENTIONS

- However, sometimes may be necessary to use smaller point size to fit table on the page
 - In such cases, the largest possible font size should be used. If it appears that 8 point is too large, try using Arial Narrow before decreasing the point size any further.
-

II.12 FOOTNOTES

- Do not use MS Word's footnote function that is used to place footnotes at the bottom of page
 - Footnotes should appear immediately following table, not in the table or at bottom of page
 - The CTPS template Table Source style automatically provides the proper spacing
 - Use an asterisk (*) if only one footnote is needed
 - For an all-text table, use numbers as footnote symbols
 - For numerical or mixed (numbers and text) data, use lower case letters as footnote symbols
 - Make letters and/or numbers superscript both in the table and in the footnote
 - Footnotes within a table should read alphabetically or in numerical order, left to right
 - Avoid using symbols for footnotes, e.g. († ‡ §)
-

II.13 HYPHENATION

- Do not hyphenate words in tables
-

II.14 LANDSCAPE-ORIENTED (HORIZONTAL) TABLES

When placing in a document with mostly portrait-oriented pages:

- Position so that the top of the table is on reader's left
-

II.15 NOT APPLICABLE/NOT AVAILABLE

- "N/A," not "na" or "NA"
 - If data for a cell are not available or not applicable, you may put an em dash in the cell (use the Special Character tab in the Insert Symbol dialog box)
 - If N/A is used, you should define the [acronym](#) in the citation area
-

II.16 NUMBERS

Commas:

- Use commas in numbers (1,000 *not* 1000)

Decimals:

- Include leading zeros (0.68 *not* .68) and closing zeros (1.60 *not* 1.6, if rounding to two decimal places)

Negative Numbers:

- Use a negative sign rather than parentheses () to denote negative numbers
-

II.17 PLURAL VS. SINGULAR WORDING

- Almost always use singular form in column heads
 - Example: "Model Statistic," not "Model Statistics"
-

II.18 PROJECT NAME

- Does not need to appear with the table unless table will be distributed separately
 - Example: meeting handout; in which case, project name may be added in header or footer
 - Should not be part of table or table title
-

II.19 ROW HEADS

- The far left column contains the titles of rows ("row heads")
 - The row head must contain information that defines the contents of a row
 - Generally composed of text, so often is wider than the other columns of data in table
-

FORMATTING CONVENTIONS

- Capitalize only first letter of first word
 - A **subtotal** row head should state which rows are included in the subtotal
-

II.20 SHADING

- Refers to shading within cells/rows
 - May use with discretion
 - Use high contrast shading (text should stand out from background)
 - Shading of alternate rows is recommended on large tables—of one page or longer
-

II.21 SPACING***Spacing between columns:***

- Avoid large gaps between columns
- Space between columns should appear equal
- If you have groups of columns within a table, then add more space between the groups
- There should be space between a cell's contents, borders, and content of adjacent cells
- You may add space by indenting text by using the either the left or right horizontal alignment function

Spacing between rows:

- Add a small amount of space above and below each horizontal border (in Excel, increase the row height and vertically align at the top, center, or bottom of cell to achieve desired result)
-

II.22 SOURCE

- Citation of source should begin with the word "Source" followed by a colon
 - Should come last at bottom and outside of table, in the citation area
-

II.23 TABLES THAT CONTINUE ON MULTIPLE PAGES

- Use the Repeat Header Rows table function.
 - Allow tables to break naturally.
 - Do not break them manually.
 - The headings of your table will automatically repeat on each new page (as happens with this text table).
-

II.24 TEXT TABLES

- The document you are reading is formatted as a text table.
 - You may use them to organize text data in a document.
 - Some of the rules of numerical data tables do not apply.
 - For example, you may center columns of text if helpful in displaying meaning of content.
-

II.25 TITLES/TABLE NUMBERS***Table number line (for example, "TABLE 3-9"):***

- The word "TABLE" in the table number should be all caps
- Table numbers should be bold and on a separate line above the table title

Table title:

- Style of type = bold; capitalize Like the Title of Book, as in This Sentence; centered above table
 - Font = Arial, 12 point
 - Titles of all tables in a document should be in the same point size
 - Okay if title does not fit on single line are; text should wrap (flow from line to line)
 - Table title formatted in Caption style in the CTPS memo and report templates
-

II.26 TOTAL

FORMATTING CONVENTIONS

- “Total,” not “Totals”
- Entire total row should be bold
- Put a border above and below total row
- Subtotals: entire row should be italics

II.27 UNIT SIGNS

- Unit signs are symbols that refer to units of measure; for example: #, \$, %, x, kg, mph, etc.
 - They should be used in a cell, abutting (either right or left) the data they portray.
 - There is no need to repeat the same unit sign in every cell in a column unless it changes.
 - Unit signs should not be used in column or row heads; rather, write the word, i.e., “percent,” not “%.”
 - As noted above, all abbreviations and acronyms used in a table must be defined below last row of table in the [citation area](#).
-

APPENDIX A – INSTRUCTIONS FOR INSERTING EXCEL TABLES INTO WORD²

- Highlight and copy the cells comprising the table (omit any cells containing table title or text that appears in the [citation area](#), as these are added in Word outside the table): and paste the cells into Word using either of the two options in the Paste drop-down menu (first button on the Home ribbon bar) that offer to “preserve source formatting.”
- These options transform the Excel cells into a Word table, optionally providing for automatic updates if the original Excel cells are edited.
 - **Option 1: “Keep Source Formatting”**
 - **Option 2: “Link and Keep Source Formatting”**

If you choose this option when you paste your table, right-click anywhere in the inserted table and choose Links from the Linked Worksheet Object submenu in the context menu. Check the option to preserve formatting after update in the Links dialog box.

If you move your Excel workbook to a different location or rename it, you can use this dialog box to restore the link between it and your copy of the table in Word.
- After the table has been inserted, click anywhere in the inserted table so that the Table Tools Layout ribbon bar becomes available. Click the Properties button on that ribbon bar to open the Table Properties dialog box.
- Select the Table tab in the dialog box and click the Center alignment button. Then, click the Options button, set the left and right Default cell margins to 0 in the Table Options dialog box, and click the OK button.

² For more information, please see the table template at http://laputa/new_site/standards/requirements_and_templates.html

APPENDIX B – SAMPLE TABLES WITH ANNOTATED DESCRIPTIONS

SIMPLE TABLE: FORMAT GUIDE (Part 1)

TABLE 1
Results of the Ridership Analysis of the Urban Ring Study

Model Statistic	New Parking Supply	Old Parking Supply
Daily transit mode split	47	44
Daily transit trips	8,000 ^a	75,000
Daily auto trips	375,000	375,000
Daily vehicle miles traveled on arterial roadways	275,800	275,800
Daily vehicle hours traveled		458,000
Daily parking demand	955	N/A
Unit operating cost per passenger	\$0.80	\$1.85
<i>Subtotal</i>	579,500	579,500
Total	579,500	579,500

Note: This table is not meant to make sense.
^a 8,000 is bold
 N/A = not applicable
 Source: Data from Massachusetts Port Authority, Logan Five-Year Plan (2002), pp.121-27.

- 1 ACRONYMS/ABBREVIATIONS
- 2 ALIGNMENT
- 3 BOLD TYPEFACE
- 4 BORDERS
- 5 CAPITALIZATION
- 6 CITATION AREA
- 7 COLUMN HEADS

- 1 COLUMN WIDTHS
- 1 CONSISTENCY (not shown)
- 10 EMPTY CELLS
- 11 FONT AND POINT SIZE
- 12 FOOTNOTES
- 13 HYPHENATION (never use in tables)
- 14 LANDSCAPE-ORIENTED (HORIZONTAL) TABLES

11 FONT AND POINT SIZE:
Aria: 12 points

14 Example of LANDSCAPE-ORIENTED (HORIZONTAL) TABLES

5 Sentence style capitalization in row heads

6 Citation area below table includes:
 i Notes
 ii Footnotes
 iii Acronyms
 iv Source

2 Align text at the bottom of the cell

5 Title style capitalization in column heads

2 Right-align if all numbers
Left-align if all text
Right-align if text and numbers combined

11 Citation area font and point size: 10 point

APPENDIX B – SAMPLE TABLES WITH ANNOTATED DESCRIPTIONS (Cont'd.)

SIMPLE TABLE: FORMAT GUIDE (Part 2)

25 Space below the table title is automatically set to half the text point size when the "caption" style is used

25 TABLE 1
Results of the Ridership Analysis of the Urban Ring Study

17 Use singular form in column heads

19

21 Hanging indent (2 spaces)

Model Statistic	20 New Parking Supply	Old Parking Supply
Daily transit mode split	47	44
Daily transit trips	8,000 ^a	75,000
Daily auto trips	20 375,000	375,000
Daily vehicle miles traveled		
on arterial roadways	275,600	275,600
Daily vehicle hours traveled	N/A	456,000
Daily parking demand	955	15 N/A
Unit operating cost per passenger	27 \$0.80 16	27 \$1.65 16
24 Subtotal	579,500	579,500
26 Total	579,500	579,500

21 Extra space below and above borders

16 Use commas in 1,000s

Note: This table is not meant to make sense.

^a 8,000 is bold

15 N/A = not applicable

22 Source: Data from Massachusetts Port Authority, Logan Five-Year Plan (2002), pp.121-27.

21 Spacing between columns should appear equal

Citation area font and point size: 10 point

15 NOT APPLICABLE/NOT AVAILABLE

16 NUMBERS

17 PLURAL VS. SINGULAR WORDING

18 PROJECT NAME (generally does not appear with tables)

19 ROW HEADS

20 SHADING

21 SPACING

22 SOURCE

23 TABLES THAT CONTINUE ON MULTIPLE PAGES (not shown)

24 TEXT TABLES (not shown)

25 TITLES/TABLE NUMBERS

26 "TOTAL"

27 UNIT SIGNS

Chapter 3—Making Meetings Accessible

3.1 MPO ACCESSIBLE MEETING POLICY

Public access to, and participation in, government is a fundamental right protected by both state and federal law. The Massachusetts Public Accommodation Law and the Americans with Disabilities Act mandate that persons with disabilities must not be denied participation in public meetings, and that [reasonable accommodation](#) requests made by attendees should be honored. In addition, Title VI of the Civil Rights Act of 1964 prohibits denial of meaningful access to programs and services, including public outreach activities, on the basis of race, color, national origin, and limited English proficiency.

All MPO meetings and committee meetings, and MPO-sponsored public meetings and events are held at locations that are accessible to people with disabilities and are near public transportation. In keeping with ADA, MPO staff make every effort to provide accommodations such as assistive-listening devices, materials in accessible formats, and interpreters in American Sign Language. To comply with Title VI, meeting materials are provided in languages other than English, and meeting accommodations, such as interpreters in languages other than English are provided on request. Meeting attendees are not charged for any reasonable accommodation provided.

3.2 ACCESSIBLE MEETING PROTOCOLS

Cited below are protocols used by MPO staff to ensure that meetings are accessible. Appendix C contains a checklist, customized to meet the MPO's needs, that guides a meeting planner through steps to to make a meeting accessible, including: publicizing a meeting, selecting a location, choosing reasonable accommodations, and readying the facility.

3.2.1 Inviting Requests for Accommodations

MPO staff strive to plan and publicize public meetings as early as possible—ideally, 14 to 21 calendar days in advance, to allow attendees time to submit requests for reasonable accommodations, and for outreach materials to be translated into necessary languages.

MPO staff publicize meetings through a variety of means, including flyers, email notifications, etc., as discussed in the MPO's Public Participation Plan (Appendix D). In addition, all MPO and MPO-sponsored meetings are posted on the MPO's website at www.bostonmpo.org.

The MPO includes the following language on its website and all meeting notices to inform individuals how to request special meeting accommodations.

Meeting locations are accessible to people with disabilities and are near public transportation. Upon request (preferably two weeks in advance of the meeting), every effort will be made to provide accommodations such as assistive-listening devices, materials in accessible formats and in languages other than English, and interpreters in American Sign Language and other languages. Please contact the MPO staff at 617.973.7100 (voice), 617.973.7089 (TTY), 617.973.8855 (fax), or publicinformation@ctps.org.

Within 48 hours of receiving an accommodation request, the meeting planner should follow up to confirm that the request was received and will be honored to the extent possible. If a request cannot be honored, the meeting planner should discuss alternate plans with the person who made the request; for example, if an American Sign Language interpreter cannot be arranged, the meeting planner should explore CART or video remote interpreting as a substitute.

3.2.2 Providing Meeting Accommodations

Below is a discussion of the types of meeting accommodations that may be requested and instructions for providing them.

[American Sign Language \(ASL\)](#)

To ensure their availability, staff should make arrangements for interpreter services at least 14 calendar days (preferably 21) in advance of a public meeting. Requests for interpreters can be made through the [Massachusetts Commission for the Deaf and Hard of Hearing](http://mass.gov/mcdhh) (MCDHH) website at <http://mass.gov/mcdhh> ([click on "Request an Interpreter" under "Key Resources" on the left hand menu](#)). Requesters are notified by MCDHH as soon as the request is filled: at a minimum two business days before the assignment date.

Because it may be difficult to arrange interpreter services even when requesting 14 days in advance, it may be prudent to schedule services before it is known for certain that they will be needed. The services can then be cancelled if not needed, but this should be done at least 48 hours advance to avoid being billed for the service.

Interpreters are billed at a minimum of two hours. For a two-hour assignment, requesters may anticipate a bill in the range of \$100-\$150 (which includes travel and mileage expenses). Because of the demanding nature of sign language interpreting, two interpreters may be necessary so that there will be time for each to rest during the meeting.

Unless specifically requested (or if an ASL interpreter is not available), [video remote interpreting](#) will not be considered a substitute for an on-site interpreter.

Assistive-Listening Device (ALD)

The MPO provides ALDs at all meetings for attendees who are hard of hearing. Although attendees are asked to request ALDs in advance of the meeting, staff routinely makes the devices available at all meetings.

ALDs are placed on a table near the meeting room entrance with a sign to identify them. At the beginning of each meeting, attendees are informed that ALDs are available. Several MPO staff, at least one of whom is at each MPO or public meeting, are trained in the use of the ALDs so that they may offer assistance if needed.

CART Services

CART services should be arranged at least 14 calendar days in advance of the meeting. Requests for CART services may be made through the [Massachusetts Commission for the Deaf and Hard of Hearing](#) (MCDHH) website at <http://mass.gov/mcdhh> ([click on "Request a CART Provider" under "Key Resources" on the left hand menu](#)).

As with sign language interpreters, it may be difficult to arrange CART services even when requesting them two weeks in advance; therefore, it may be prudent to schedule services before it is known that they will be needed. The services can then be cancelled if not needed. CART providers must be cancelled no later than 72 hours in advance of the event to avoid being billed for the services.

CART services are billed at a minimum of three hours. In most situations, one CART provider is sufficient if the meeting is no longer than three hours. The CART provider brings any equipment necessary for the service. For remote CART (i.e., the CART reporter is not in the room), Wi-Fi or other internet connection must be available in the meeting room. If using remote CART, staff should try to apprise the reporter of any technical terms or acronyms to be used, as well as the names of key meeting attendees, before the meeting date.

Foreign Language Interpreters

Foreign language interpreter services are generally procured through the [UMass Translation Center](#). To obtain a cost estimate for a translation, staff can email a description of the job to: umass.translation@umasstranslation.com. Short-notice interpreting services can be requested by [contacting the Center directly](#) at (413) 545-2203.

Interpreting services for all languages cost \$60/hour. There is a two-hour minimum, and services must be cancelled 24 hours in advance to avoid billing. Interpreters are also paid for mileage at the current Internal Revenue Service rates and travel time at \$20/hour. Telephone interpreting services are \$50/hour.

Conference interpreting and tele-interpreting via satellite TV are also available through the center.

[Video Remote Interpreting](#)

If requested in advance, MPO staff will make every effort to provide video remote interpreting, which requires a computer/laptop with a webcam and high-speed internet connection. However, because this technology is new and may not be available, ASL interpreters may be provided as a substitute.

3.2.3 Providing Meeting Material in Alternative Formats and Language Translations

Types of alternative formats that are generally requested are discussed below. MPO staff will make every effort to accommodate all reasonable requests for materials in these formats, as well as other formats specified by individuals to meet their unique needs. When requests are made in advance of a meeting, alternative format materials are provided at the start of the meeting. For requests made at or following a meeting, alternative format materials are provided within seven days.

[Large-Print Format](#)

A limited number of large-print versions (16-point font) of printed material are generally available at meetings. However, because the font size needed will vary from individual to individual, meeting attendees are advised to request large-print materials in advance so that they can specify their individual needs.

Large-print meeting materials should:

- Be created using "Arial" font with a font size of at least 16 points (Arial 12 point documents can be converted to 16 point if enlarged 134%)
- Contain the same information as the original handout
- Have the highest contrast possible (e.g., black on white)
- If graphics (such as images, tables, or graphs) are used in the original document, the same graphics should be included in the large-print version
- If graphics are used, a brief description of the image should be provided (giving the reader a general idea of what the image conveys)
- If tables or graphs are used, a summary of the table or graph should be provided

Electronic, Braille, and Audible Formats

Electronic files of meeting materials will be emailed or placed on a CD, which may be picked up at the meeting or mailed to the requester.

Staff has access to a Braille embosser on site, so will create Braille documents, as needed.

All meetings of the MPO are recorded and placed on the website as mp3 files, and other meetings can be recorded on request. In addition, administrative or temp staff can create audio recordings of meeting materials, if requested.

Foreign Language Translations

Translations are generally procured through the [UMass Translation Center](#). To obtain a cost estimate for a translation, staff emails a description of the job with a content sample attached (e.g., a couple pages for simple documents, or a number of sample documents for more complex projects) to: umass.translation@umasstranslation.com.

Documents as long as five pages are usually translated within five business days; for longer documents, the time varies based on their length and complexity. There is a minimum fee, and rates vary by language from 15–20 cents per word for West European languages to 23–43 cents per word for lesser-known languages. There is a 20% surcharge for handwritten, technical, legal, literary, medical, multilingual materials, and rush service.

3.2.4 Making Announcements and Presentations

When opening a public meeting, presenters should announce:

- The presence and function of sign language interpreters (if they are in the room), and/or CART providers
- That assistive-listening equipment is available
- The location of accessible restrooms
- A safety briefing that includes information about where attendees who require assistance should wait during an emergency (planners should familiarize themselves with the evacuation plan for the room before the meeting begins).

When presenting at public meetings, speakers should:

- Speak slowly and clearly so that sign language interpreters have time to interpret
- Verbally describe information presented visually (e.g., PowerPoint) so that attendees with visual impairments can access the information

- Ensure that any videos/DVDs shown during the meeting are encoded with closed captioning and are shown on a closed-caption compatible device.
 - Subtitles are an acceptable alternative for closed captioning.
 - An alternate version of the video/DVD with descriptive video/described narration could also be used; however this may not be a good choice in an open meeting, as it could cause problems for other viewers.
 - Resources for adding closed captioning and/or described narration to video:
 - WGBH: <http://main.wgbh.org/wgbh/pages/mag/services/captioning>
 - 3 Play Media: <http://www.3playmedia.com>
 - Line 21—<http://www.line21.tv>
 - TelePrint Digital Media: <http://www.tele-print.com>
 - Broadcast Captioning & Consulting Services: <http://www.closedcaptioning.com>

3.2.5 Choosing a Location

Consider the following characteristics when choosing a meeting site:

Easy Access to Transit

All public meetings should be within one-quarter mile of an accessible bus stop or rail station, where feasible, and the path of travel from the transit stop to the meeting location should meet the following accessibility requirements:

- At least three feet wide
- Unobstructed (not blocked by trashcans, light poles, etc.)
- Free of steps, drop-offs or curbs

Access to Parking

If parking is provided, meeting planners should ensure that accessible parking is available and that the spaces are:

- At least three feet wide
- Unobstructed (no trash cans, light poles, etc.)
- Free of steps, drop offs or curbs

The path-of-travel requirements for parking are the same as stated above for access to transit.

For additional information on the number and type accessible parking spaces required, see the accessible parking factsheet provided in Appendix E (also at: <http://adata.org/factsheet/parking>).

Identified Accessible Entrance

If the main entrance to the building in which a public meeting is being held is not the accessible entrance, a sign containing the universal symbol of accessibility, with an arrow pointing to the location of accessible entrance, should be posted.

In addition, meeting planners should ensure that the alternate accessible entrance is unlocked and available for independent usage, and that the path of travel to the alternate entrance is well lit (if the meeting is taking place at night). If the door is locked and intercom service or another format is used to gain access, an attendant must be at the door to accommodate deaf or hard-of-hearing individuals, as well as others with disabilities.

Accessible Restrooms

If restrooms are available for public use at a meeting location, at least one accessible restroom for men and one for women (or one accessible gender-neutral restroom) should be available. The accessible restrooms should be within reasonable proximity to the meeting room.

Accessible Telephones

If two or more public payphones are available at the meeting facility, at least one should be:

- Equipped with TTY
- Mounted no higher than 48" from the floor and provide clear floor space 30" wide and 48" wide (so that attendees using wheeled mobility can properly access the phone)
- MPO staff should notify the facility owner if the facility does not comply with the accessible telephone requirement

3.2.6 Making the Meeting Room Accessible:

The meeting room in which a public meeting will take place should be made accessible for persons with disabilities by providing the following:

Seating for Wheeled-Mobility Devices

- An integrated seating area for wheeled-mobility-device users should be made available.
- If possible, meeting planners should remove several chairs to accommodate potential attendees who use wheeled-mobility devices
- Spaces for wheeled-mobility-device users should be dispersed throughout the room—not clustered in one section—to allow attendees using these devices a variety of seating/viewing options

Space for Sign Language Interpreters and (CART)

A well-lit area and chairs facing the audience should be made available for sign language interpreters at the front of the room.

If a CART provider will be used, a small table for the laptop and space for a screen and projector should be provided near an electrical outlet.

Priority seating at the front of the audience and in direct line of sight of the interpreters/CART provider should be provided for attendees who are deaf/hard of hearing.

Space for Foreign Language

If foreign language interpreters will be at the meeting, space should be provided where they can sit with the individuals who require language assistance.

Aisles

Aisles within the meeting room should be:

- Clear of tripping hazards (e.g., electric cords)
- At least three feet wide

Microphones

The MPO owns two amplification systems, and one or the other is used at every meeting, depending on the size of the space and the meeting format. At meetings where speakers are seated at tables with the public in the audience, a system with multiple microphones (as many as eight) is used. For smaller venues, an amplification system with one microphone is used.

Regardless of the size of the room or type of meeting, a staff member provides a cordless microphone to any individuals from the audience who speaks.

Podiums

If any attendee might have an opportunity to speak at a podium, meeting planners should ensure that:

- The podium height is adjustable, or
- A small table is provided to the side of the podium
- The table is between 28 and 34" inches high
- There is at least 27" of knee space from the floor to the underside of the table
- If a microphone is provided at the podium, one also should be provided at the small table

Raised Platforms

If any attendee might have an opportunity to move onto a raised platform or stage during the meeting, the raised platform or stage should be accessible by:

- A ramp that is at least three feet wide and does not have a slope that exceeds a rise/run ratio of 1/12
- A platform lift

High-Speed internet Connection

If video remote interpreting or CART will be used at the meeting, a high-speed internet connection will be needed. There also should be a conference-capable telephone with a speakerphone function available. In the State Transportation Building conference rooms, staff must make requests internet connection to building management in advance of a meeting

Chapter 4—Training Staff

4.1 UNDERSTANDING CIVIL RIGHTS

All MPO staff will receive training regarding treatment of people protected under the various civil rights laws and regulations referenced earlier in this document. This training is being developed and implemented in collaboration with the MassDOT Office of Diversity and Civil Rights, the Massachusetts Office of Diversity and Equal Opportunity, the Massachusetts Office of Disability, the Massachusetts Commission for the Deaf and Hard of Hearing, and the Massachusetts Commission for the Blind. Additional training will be given to respond to changes in nondiscrimination policies or practices and to ensure that new staff are properly instructed.

4.2 COMMUNICATING EFFECTIVELY

The all-staff training will provide general information about civil rights requirements and foster awareness of and respect for diversity. It will also teach staff how to communicate effectively with people with various types of disabilities, and those with limited English proficiency, including strategies for both one-on-one and group interactions.

In addition, staff who have frequent involvement with public-participation activities and staff who regularly make presentations at MPO and public meetings will receive more in-depth training on communication strategies, including techniques for describing PowerPoint or other presentation materials to individuals with low or no vision.

4.3 PROVIDING REASONABLE ACCOMMODATION

Staff who are responsible for individual tasks related to making meetings, meeting materials, and other documents accessible are identified in advance and given instruction about their specific tasks.

4.3.1 Meeting Accommodations

An MPO staff member—along with a backup person—has been identified and trained to be the point person for selecting and screening meeting locations and attending to all physical accommodations, including amplification and assistive-listening equipment. Several staff members are trained in the use of ALDs and strategies for working with individuals to determine and accommodate their needs in the best possible way.

Annually, the meeting point person will review and revise (as needed) all documentation of meeting location screening and set-up protocols and determine whether additional staff need to be trained on any aspect of meeting setup or the use of ALDs.

4.3.2 Language Accommodations

To identify the primary language of LEP individuals when speaking face to face, the MPO Title VI Specialist will provide annual training in the use of language identification “I speak” flashcard (developed by the US Census Bureau) to key CTPS professional and administrative staff, including the receptionist. The phrase “Mark this box if you read or speak [name of language]” appears on this flashcard in 38 different languages (Appendix F).

In addition, the Title VI Specialist will annually update an existing list (kept at the reception desk) of staff members who speak languages other than English and are able and willing to serve as translators. Key staff in the Certification Activities Group (which has the most frequent contact with the public) will be instructed in the use of phone translation services and how to obtain written translations.

4.3.3 Accessible Documents

All staff have been trained in accessible-document protocol. This handbook, document templates, and other helpful guidance are posted on the CTPS intranet site so that all staff have easy access to the information at all times.

Chapter 5—Communicating with People with Disabilities

This chapter provides information to facilitate communicate with people with disabilities one-on-one or in other settings.

5.1 GENERAL COMMUNICATION GUIDELINES

- When introduced to a person with a disability, it is appropriate to offer to shake hands. People with limited hand use or who wear an artificial limb can usually shake hands. (Shaking hands with the left hand is an acceptable greeting.)
- If you offer assistance, wait until the offer is accepted. Then listen to or ask for instructions.
- Relax. Don't be embarrassed if you happen to use common expressions such as "See you later," or "Did you hear about that?" that seem to relate to a person's disability.
- Don't be afraid to ask questions when you're unsure of what to do.

5.2 COMMUNICATING WITH INDIVIDUALS WHO ARE BLIND OR VISUALLY IMPAIRED

- Speak to the individual when you approach him or her.
- State clearly who you are; speak in a normal tone of voice.
- When conversing in a group, remember to identify yourself and the person to whom you are speaking.
- Never touch or distract a service dog without first asking the owner.
- Tell the individual when you are leaving.
- Do not attempt to lead the individual without first asking; allow the person to hold your arm and control her or his own movements.
- Be descriptive when giving directions; verbally give the person information that is visually obvious to individuals who can see. For example, if you are approaching steps, mention how many steps.
- If you are offering a seat, gently place the individual's hand on the back or arm of the chair so that the person can locate the seat.

5.3 COMMUNICATING WITH INDIVIDUALS WHO ARE DEAF OR HARD OF HEARING

- Gain the person's attention before starting a conversation (i.e., tap the person gently on the shoulder or arm).
- Look directly at the individual, face the light, speak clearly, in a normal tone of voice, and keep your hands away from your face. Use short, simple sentences.
- If the individual uses a sign language interpreter, speak directly to the person, not the interpreter.
- If you telephone an individual who is hard of hearing, let the phone ring longer than usual. Speak clearly and be prepared to repeat the reason for the call and who you are.

5.4 COMMUNICATING WITH INDIVIDUALS WITH MOBILITY IMPAIRMENTS

- If possible, put yourself at the wheelchair user's eye level.
- Do not lean on a wheelchair or any other assistive device.
- Never patronize people who use wheelchairs by patting them on the head or shoulder.
- Do not assume the individual wants to be pushed—ask first.
- Offer assistance if the individual appears to be having difficulty opening a door.
- If you telephone the individual, allow the phone to ring longer than usual to allow extra time for the person to reach the telephone.

5.5 COMMUNICATING WITH INDIVIDUALS WITH SPEECH IMPAIRMENTS

- If you do not understand something the individual says, do not pretend that you do. Ask the individual to repeat what he or she said and then repeat it back.
- Be patient. Take as much time as necessary.
- Concentrate on what the individual is saying.
- Do not speak for the individual or attempt to finish her or his sentences.
- If you are having difficulty understanding the individual, consider writing as an alternative means of communicating, but first ask the individual if this is acceptable.

5.6 COMMUNICATING WITH INDIVIDUALS WITH COGNITIVE DISABILITIES:

- If you are in a public area with many distractions, consider moving to a quiet or private location.
- Offer assistance to complete forms or explain written instructions and provide extra time for decision making. Wait for the individual to accept the offer of assistance; do not "over assist" or be patronizing.
- Be patient, flexible and supportive. Take time to understand the individual and make sure the individual understands you.

5.7 ADDITIONAL RESOURCES

For additional information on this topic, you may visit:

- *Communicating Effectively With People Who Have A Disability*, North Dakota Center for Persons with Disabilities
<http://www.labor.state.ny.us/workforcenypartners/forms/communication.pdf>
- MassDOT Office of Diversity and Civil Rights
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>
- MBTA System Wide Accessibility
http://www.mbta.com/riding_the_t/accessible_services/default.asp?id=16901
- Massachusetts Office on Disability <http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/mod/>
- Commonwealth of Massachusetts - Office of Access and Opportunity
<http://www.mass.gov/anf/employment-equal-access-disability/diversity-access-and-opportunity/access-and-opportunities/>

Appendix A—MPO Notice to Beneficiaries and Complaint Procedures

To ensure that the MPO does not discriminate, either intentionally, or unintentionally, when providing its programs and activities, the MPO has established a notice to beneficiaries that informs them of their rights. In addition, anyone who believes that he/she or any specific class of persons has been subjected to discrimination prohibited by Title VI, ADA (or other nondiscrimination statute or regulation) in MPO programs and activities may, either singly or via a representative, file a written complaint. All complaints must be filed no later than 180 calendar days after the date on which the person believes the discrimination occurred. Below is the notice of beneficiaries used by the MPO, the MPO's complaint procedures, and associated forms used to file a civil rights complaint.

A.1 BOSTON REGION MPO NOTICE TO BENEFICIARIES

Federal "Title VI/Nondiscrimination" Protections

The Boston Region Metropolitan Planning Organization (MPO) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within the Boston Region MPO's Title VI Programs consistent with federal interpretation and administration. Additionally, the Boston Region MPO provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

The Boston Region MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 §§ 92a, 98, 98a, prohibiting 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 Boston Region MPO complies with the Governor's Executive Order 526, section 4 requiring 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.

A.2 COMPLAINT PROCEDURES

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance either directly or via contract. Executive Order 13166 provides for equal access to services and benefits for individuals with limited English proficiency (LEP). Language access is deemed to be covered under Title VI in terms of national origin.

An additional executive order and several related federal statutes further define populations that are protected from discrimination. Executive Order 12898 is concerned with environmental justice for minority and low-income populations. The Americans with Disabilities Act (ADA) protects the rights of persons with disabilities. The rights of women and the elderly are protected under other federal statutes.

The Massachusetts Public Accommodation Law, M.G.L. c 272 §§92a, 98, and 98a and the Governor's Executive Order 526, section 4 provide protections to prevent discrimination on the basis of religion, veteran status, ancestry, sexual orientation, or gender identity or expression, in addition to the categories cited above.

The Boston Region Metropolitan Planning Organization (MPO) maintains the following procedure for receiving, investigating, addressing, and tracking Title VI and other discrimination complaints.

A.2.1 Submittal of Complaints

A written complaint may be filed by any individual who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by the Boston Region MPO on the basis of race, color, national origin, language, gender, age, disability, income, religion, military service, ancestry, sexual orientation, or gender identity or expression. Such complaint must be filed no later than 180 calendar days after the date the person believes the discrimination occurred.

Written complaints shall be submitted to:

Mr. Richard A. Davey, Chair
Boston Region Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116-3968

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as completely as possible the facts of and circumstances surrounding the alleged discrimination and shall include the following information:

- Name, address, and phone number of the complainant
- A written statement of the complaint, including the following details:
 - Basis of alleged discrimination (for example, race, color, national origin, or language)
 - Detailed description of the alleged discriminatory act(s)
 - Nature of the incident(s) that led complainant to feel discrimination was a factor
 - Date(s) on which the alleged discriminatory event or events occurred
 - Name(s) of alleged discriminating individual(s), if applicable
- Other agencies (state, local, or federal) where the complaint is also being filed
- Complainant's signature and date

In the case where a complainant is unable or incapable of providing a written statement and has no designee to do so, a verbal complaint of discrimination may be made through the Boston Region MPO executive director. Verbal complaints may be submitted (either in person, by telephone at 617- 973-7100 or via a recording) to the executive director. The executive director will ensure that the verbal allegations are converted to a written allegation and that the complainant has the opportunity to review, revise, and approve the written document before it is processed. In cases where the complainant is assisted in converting an oral complaint into a written complaint, the complainant is required to sign the written complaint to confirm that it accurately reflects their allegations.

Written complaints may also be submitted to:

MassDOT Director of Civil Rights
10 Park Plaza, Suite 4160

Boston, MA 02116
Departmental Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave.
Washington D.C. 20590

A.2.2 Review of Complaint

Upon receipt of the complaint, the MPO chair shall appoint the Boston Region MPO executive director and other MPO staff to review it. This review may include the collection of additional information from the complainant and/or the alleged discriminating party (or parties). Upon completion of the review, the executive director shall report to the MPO chair or the chair's designee. This report may include recommendations for possible action to address the complaint.

Recommendations may include:

- Forwarding the complaint to a responsible implementing agency
- Identifying remedial actions available to provide redress
- Identifying improvements to the MPO's processes relative to Title VI, environmental justice, and other populations covered by this procedure

The MPO chair or the chair's designee shall refer the matter to the MPO's Administration and Finance Committee, which shall meet to discuss the complaint and the staff report.

A.2.3 Responding to Complaints

The Administration and Finance Committee shall develop a proposed response to the complaint, recommending a course of action, and submit it to the MPO for discussion and approval. The MPO chair shall decide on a response to the complaint and inform the MPO of the response.

The MPO chair shall issue a written response to the complainant. This response shall be issued no later than 60 days after the date on which the chair received the complaint. If more time is required, the chair shall notify the complainant of the estimated time frame for completing the review and response.

If a complaint concerns agencies other than the Boston Region MPO, MPO staff will seek permission from the complainant to forward his/her complaint to appropriate individuals at those agencies.

A.2.4 Appeals

The complainant may appeal the chair's response to the complaint. Appeals must be in writing and shall be submitted to either of the following no later than 30 days after the date of the written response:

MassDOT Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116
Departmental Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave.
Washington D.C. 20590

In the case where a complainant is unable or incapable of providing a written appeal and has no designee to do so, a verbal appeal to a complaint-of-discrimination decision may be made through the executive director. Verbal appeals may be submitted (either in person, by telephone at 617-973-7100, or via a recording) to the executive director. The executive director will ensure that the verbal appeal is converted to a written appeal and that the complainant has the opportunity to review, revise, and approve the written document before it is processed. In cases where the complainant is assisted in converting an oral appeal into a written appeal, the complainant is required to sign the written appeal to confirm its accuracy.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel. These procedures are part of an administrative process that does not include punitive damages or compensatory remuneration for the complainant.

MPO staff will forward complaints and responses to those complaints to the Massachusetts Department of Transportation's (MassDOT) Office of Civil Rights. The MPO shall maintain a list of complaints, lawsuits, and investigations alleging discrimination on the basis of race, color, or national origin. The list shall include filing date(s), allegation summaries, status of the investigation, lawsuit or complaint, and actions taken by the MPO. The list of complaints, investigations and resolutions will be forwarded to MassDOT's Office of Civil Rights. A summary of all civil rights compliance review activities conducted over the latest three-year period shall be maintained.

A.3 BOSTON REGION MPO CONSENT/RELEASE FORM FOR DISCRIMINATION

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____

As a complainant, I understand that the MPO may need to disclose my name during the course of the complaint review process to persons other than those

conducting the review, in order for the review to be thorough. I am also aware of the obligation of the MPO to honor requests under the Freedom of Information Act: I understand that it may be necessary for the MPO to disclose information, including personally identifying details, which it has gathered as part of the investigation of my complaint. In addition, I understand that as a complainant I am protected by MPO policies and practices from intimidation or retaliation in response to my having taken action or participated in action to secure rights protected by nondiscrimination statutes and regulations that are enforced by the MPO.

Please check one:

I GIVE CONSENT and authorization to the MPO to reveal, insofar as required for an effective investigation, my identity to persons at the organization identified by me in my formal complaint. I also authorize the MPO to discuss, receive, and review materials and information about me with appropriate administrators or witnesses for the purpose of investigating this complaint. In doing so, I have read and understand the information at the beginning of this form. I also understand that the information received will be used for authorized civil rights compliance activities only. I further understand that I am not required to sign this release, and do so voluntarily.

I DENY CONSENT and authorization to the MPO to reveal, in the course of its investigation of my discrimination complaint, my identity to persons at the organization identified by me in my formal complaint, other than those who will be conducting the investigation. I also deny consent to the MPO to disclose any information contained in this complaint to any witnesses I have mentioned in the complaint. In doing so, I understand that I am not authorizing the MPO to discuss, receive, and review materials and information about me from the same. In doing so, I have read and understand the information at the beginning of this form. I also understand that my decision to deny consent may impede the investigation of my complaint and may result in an unsuccessful resolution of my case.

Signature: _____ Date: _____

Please **sign and submit** complaint form, consent form, and any additional information to:

Mr. Richard A. Davey, Chair
Boston Region Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116-3968

A.4 DISCRIMINATION COMPLAINT AGAINST THE BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

If you need assistance completing this form, please contact CTPS at (617) 973-8495

COMPLAINANT CONTACT INFORMATION

Name: _____

Address: _____

City/Town: _____ State: _____ Zip: _____

Home phone: _____ Work phone: _____

E-mail: _____

COMPLAINT

Date of alleged incident: _____

Decision, document, statement, or other act that you believe was discriminatory: _____

If you believe that one or more MPO employees discriminated against you, name of employee(s), if known: _____

Basis of alleged discrimination:

- Race
- Age
- Ancestry
- Color
- Disability
- Sexual orientation
- National origin
- Income
- Gender identity or expression
- Language
- Religion
- Other: _____
- Gender
- Military service

Describe the nature of the incident. Explain what happened and the allegedly discriminatory action(s). Indicate who was involved. Include how other people were treated differently, if present, or how you believe others would have been treated differently if they had been present. Attach any written or graphic material or other information pertaining to the complaint.

List names and contact information of anyone who may have knowledge of the alleged discrimination.

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

How do you think this issue can be resolved?

In the course of conducting a thorough complaint review process, it may become necessary to disclose your name to persons other than those conducting the review. To allow this, sign, date, and submit the consent/release form, enclosed for your convenience.

This discrimination complaint form must also be signed and dated below.

I certify that to the best of my knowledge the information I have provided is accurate and the events and circumstances occurred as I have described them.

SIGNATURE: _____ **DATE:** _____

Attachments: Yes No

Please submit complaint form, consent/release form, and any additional information to:

Mr. Richard A. Davey, Chair
Boston Region Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116-3968

Appendix B—Boston Region MPO Language-Assistance Plan (February 2014)

Appendix B—Boston Region MPO Language-Assistance Plan (February 2014)

B.1 INTRODUCTION

On August 11, 2000, President Clinton signed Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” This Executive Order requires federal agencies to examine the services they provide, identify those whose potential users could include persons with limited English proficiency, and develop and implement a system to provide those services in such a way that LEP persons have meaningful access to them.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of national origin and, in consideration of Executive Order 13166, requires that recipients of federal funds assess and address the needs of LEP individuals seeking assistance. The US Department of Transportation (USDOT) developed guidance titled Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons to ensure that people in the United States are not excluded from participation in DOT-assisted programs and activities because they face challenges communicating in English. This guidance clarifies funding recipients’ responsibilities to provide meaningful access for LEP people under existing law by describing the factors recipients should consider in fulfilling their responsibilities to LEP persons.

The Boston Region Metropolitan Planning Organization’s Language-Assistance Plan has been developed based on DOT guidance, which identifies the following four factors to consider when determining reasonable steps for ensuring that LEP people have meaningful access³ :

- Factor 1: The number and proportion of LEP persons eligible to be served by or likely to encounter a program, activity, or service of the recipient or grantee
- Factor 2: The frequency with which LEP individuals come in contact with the program
- 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

³ FTA C4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012, p Chap. III.7.

B.1.1 Boston Region MPO Policy

It is the policy of the Boston Region MPO that people with limited English proficiency be neither discriminated against nor denied meaningful access to and participation in the programs and services provided by the MPO. The MPO has developed this plan ensure that it employs appropriate strategies to assess needs for language services; and to implement language services that provide meaningful access to the planning process and to published information without placing undue burdens on the MPO's resources.

B.2 DETERMINATION OF NEED

The MPO used the aforementioned four factors identified by USDOT to determine reasonable steps for providing meaningful access to the MPO's activities for people LEP. These factors are described below.

Factor 1: Number and Proportion of LEP People in the Boston Region MPO Area

According to the USDOT's definition, people are considered to have LEP if they speak English "not well" or "not at all." However, FTA's definition includes those who speak English "less than very well". FTA's definition is used in this analysis as it sets the upper bounds on the LEP population.

Data from the 2008–2012 five-year ACS public-use micro data sample (PUMS)⁴ were used to analyze the number of LEP persons five years of age and older in the Boston Region MPO. According to the ACS Summary file, 10.5% of this population (301,878 of the MPO area population of 2,865,258 who are five years of age and older) in the MPO region are considered to have limited English proficiency as they speak English "less than very well." The largest proportion of LEP persons speak Spanish (34.2%), followed by Chinese (14.4%), and Portuguese (12.4%). Altogether, LEP speakers of these three languages represent almost two-thirds (61%) of the MPO's LEP population five years old and older. LEP populations meeting the US Department of Transportation's definition of LEP "safe harbor" thresholds (5% of the population or 1,000 individuals, whichever is less) include speakers of the languages in the following

⁴ Geographic detail for this dataset is limited to the Public Use Micro data Area (PUMA). Each PUMA, with the exception of those overlaying the City of Boston, is made up of one or more municipalities and has a total population of at least 100,000. Boston is comprised of five PUMAs. The PUMA boundaries do not all nest within the limits of the Boston Region MPO. For those PUMAs that lie only partially within the MPO limits, the statistics were factored down in proportion to the percentage of the PUMA's 2010 five-year-and-older population residing in the MPO portion of the PUMA.

table. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be entitled to language assistance under Title VI of the Civil Rights Act of 1964. Figures B1–B-7 (at the end of the appendix) show the distribution of those with limited-English proficiency and the distribution of speakers of the top six languages.

TABLE B.1
Non-English Safe Harbor Languages in the Boston Region MPO^a

Languages Spoken	Total LEP	Pct. LEP Population	Pct. MPO Population
Spanish	103,147	34.2%	3.6%
Chinese	43,614	14.4	1.5
Portuguese	37,400	12.4	1.3
French Creole	19,061	6.3	0.7
Vietnamese	16,186	5.4	0.6
Russian	12,281	4.1	0.4
Italian	7,956	2.6	0.3
Arabic	7,534	2.5	0.3
French	6,302	2.1	0.2
Korean	5,296	1.8	0.2
Greek	4,315	1.4	0.2
Mon-Khmer, Cambodian	2,915	1.0	0.1
Albanian	2,888	1.0	0.1
Japanese	2,416	0.8	0.1
Armenian	1,856	0.6	0.1
Polish	1,821	0.6	0.1
Hindi	1,768	0.6	0.1
Gujarati	1,607	0.5	0.1
Amharic	1,402	0.5	0.0
Punjabi	1,398	0.5	0.0
Persian	1,247	0.4	0.0
Tamil	1,140	0.4	0.0
Bengali	1,076	0.4	0.0
Tagalog	1,057	0.4	0.0
Other Languages	16,195	5.4	0.6
Total	301,878	100.0%	10.5%

a Population that is five years of age and older.

b Includes those who self-identify as speaking English “less than very well,” “not well,” and “not at all.”

Factor 2: Frequency of Contact

The MPO has infrequent and unpredictable contact with LEP individuals, partly because of the nature of MPO programs and activities. The most frequent avenues for contact are the MPO website, flyers, and other announcements that are emailed to individuals and organizations, identified through the MPO's transportation equity program.

Other likely occasions for contact with non-English-speaking people are events like the MPO's public workshops, open houses, and transportation equity forums. The MPO has been making a concerted effort to identify and reach out to minority and LEP populations. Demographic maps are used to identify areas in which public outreach meetings may be needed to include LEP populations and determine the languages into which outreach materials might be translated.

To date, language interpreters have not been requested for any MPO meetings or events. The MPO will continue to monitor such requests to help inform future needs.

Factor 3: The Importance of the Service Provided by the Program

The MPO plans, and programs capital transportation funds for future transportation projects in the region. While the MPO is not a direct transportation-service provider, and denial or delay of access to the MPO's programs and activities would not have immediate or life-threatening implications for a person with LEP, transportation improvements resulting from the MPO's activities have an impact on the mobility and quality of life for all residents.

Input from all stakeholders is critical to the MPO's process, so it invests considerable effort in inclusive public outreach. The MPO encourages and helps the public to understand the transportation planning process and provides many opportunities for the public to participate and comment through a variety of activities, which are described fully in the MPO's Public Participation Plan.

Three major documents and their related planning initiatives—an annual Unified Planning Work Program, a four-year Transportation Improvement Program, and a 20-plus-year Long-Range Transportation Plan—also are important to the planning process, and offer opportunities for the public to comment on the use of federal funds that are programmed

As a result of the regional transportation planning process, selected projects receive approval for federal funding and progress through project planning, design, and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own

policies in place to ensure opportunities for people with LEP to participate in the process that shapes where, how, and when a specific project is implemented.

Some MPO documents and outreach materials are of vital importance to the public for understanding and participating in the transportation planning process. To accommodate LEP individuals, the MPO routinely translates these into the three languages most widely spoken by LEP individuals: Spanish, Chinese, and Portuguese. Documents currently identified as vital are:

- MPO Notice to Title VI Beneficiaries
- MPO complaint procedures and form
- Summaries of key materials: a description of the MPO transportation-planning process and the certification documents, LRTP, TIP, and UPWP
- Meeting notices and flyers: generally prepared for out-of-Boston MPO meetings, and all MPO-sponsored meetings, workshops, forums, and other similar input-sessions

Factor 4: Resources Available to the Recipient

The cost of providing interpreters at meetings is high; however, although the MPO has advertised the availability of interpreters, none have been requested to date. The MPO's current policy is to provide these services whenever they are requested.

Based on the number and type of meetings for which written materials need to be translated, the MPO has budgeted sufficient funds to translate vital documents into the three languages most widely spoken by LEP individuals (see section B.3.2 below). The budget also includes sufficient funds to translate documents into other languages, as needed, for public outreach or to accommodate requests. To date, only a few individuals have made such requests.

Although the MPO has been able to provide services with existing resources thus far, the region is dynamic and continues to attract diverse ethnic and cultural populations. Therefore, the MPO will continue to monitor the need for translating publications and documents and for interpretation at meetings/events, based on factors one through three of the four-factor analysis and the number of requests received, and will determine whether the current policy needs to be adjusted because of resource constraints.

B.3 PLAN IMPLEMENTATION

B.3.1 Oral Language Assistance

Notices for all MPO meetings state that translation services (including American Sign Language) are available at public meetings upon request. The current

number of residents with limited English proficiency in the Boston region, and their infrequent interaction with the MPO, have resulted in the MPO's rarely needing to provide language services. However, engaging the diverse population within the region is important, and the MPO takes the following measures to ensure meaningful access for the LEP population in the Boston region.

Key staff at the MPO office will utilize language identification "I speak" cards, developed by the US Census Bureau, when first encountering an LEP individual. On these cards appears the phrase "Mark this box if you read or speak [name of language]" in 38 different languages. Government and non-government agencies use these cards to identify the primary language of LEP individuals when face to face. To assist LEP individuals who might come to the MPO offices, language identification cards are available at the front desk, along with a list of staff members who are able and willing to serve as translators.

MPO staff that interact frequently with the public are familiar with the resources necessary to engage translators for meetings and use phone translators for one-on-one communication.

B.3.2 Written Language Assistance

The MPO's public involvement activities seek to promote respect, provide opportunities for meaningful involvement, be responsive to participants, provide a predictable process, open new avenues of communication, and attract new constituencies. The MPO provides press releases for its workshops on the LRTP and TIP. Language interpreters will be provided upon request at public meetings. Press releases announcing public review of the certification documents or their amendments are placed in the *El Mundo* and *La Semana* (the region's two major Spanish-language newspapers).

The MPO's Transportation Equity Program includes outreach to areas with relatively high concentrations of people who may be limited in their ability to speak or understand English. The MPO regularly contacts representatives of community ethnic and cultural organizations as part of the transportation equity outreach process. These individuals have been resources for identifying the needs of LEP populations and informing their communities about MPO programs and activities.

As indicated above, the MPO currently translates vital documents into Spanish, Chinese, and Portuguese, the three primary non-English languages in the region. Material is translated into other languages, as needed, when outreach meetings or forums are conducted in areas where MPO demographic maps indicate the presence of LEP populations.

MPO staff that interact frequently with the public are familiar with the resources necessary to obtain written translations of materials whenever necessary.

B.3.3 MPO Website

Google Translate is available on the MPO website, which contains considerable information on the regional transportation-planning process and the MPO's programs and activities. Google Translate allows visitors to translate any page of text into the following additional languages: simplified and traditional Chinese, French, Italian, Portuguese, Russian, Spanish, and Vietnamese. To meet accessibility requirements for individuals with low or no vision, MPO documents are posted as PDF files and in HTML, which can be read using Google Translate.

Vital documents posted on the website are formally translated into Spanish, Chinese, and Portuguese.

B.4 MONITORING AND UPDATING THE PLAN

The MPO will monitor the region's changing language needs and update language-assistance services when appropriate. The MPO will track the number of requests (by language) for language assistance in its programs and activities and will look for ways to expand participation of LEP people. If the need for language-assistance services warrants, the MPO will revise its language-access plan.

B.5 TRAINING STAFF

The *CTPS Nondiscrimination Handbook* describes a training program that is being developed to train MPO staff about the treatment and accommodation of those protected under various civil rights laws and regulations, including minority and LEP individuals. This training will be developed and implemented in collaboration with the MassDOT Office of Diversity and Civil Rights, the Massachusetts Office of Diversity, the Massachusetts Commission for the Deaf and Hard of Hearing, and the Massachusetts Commission for the Blind. Although key staff already know how to provide timely and reasonable language assistance to LEP populations, future training for all staff will include this information.

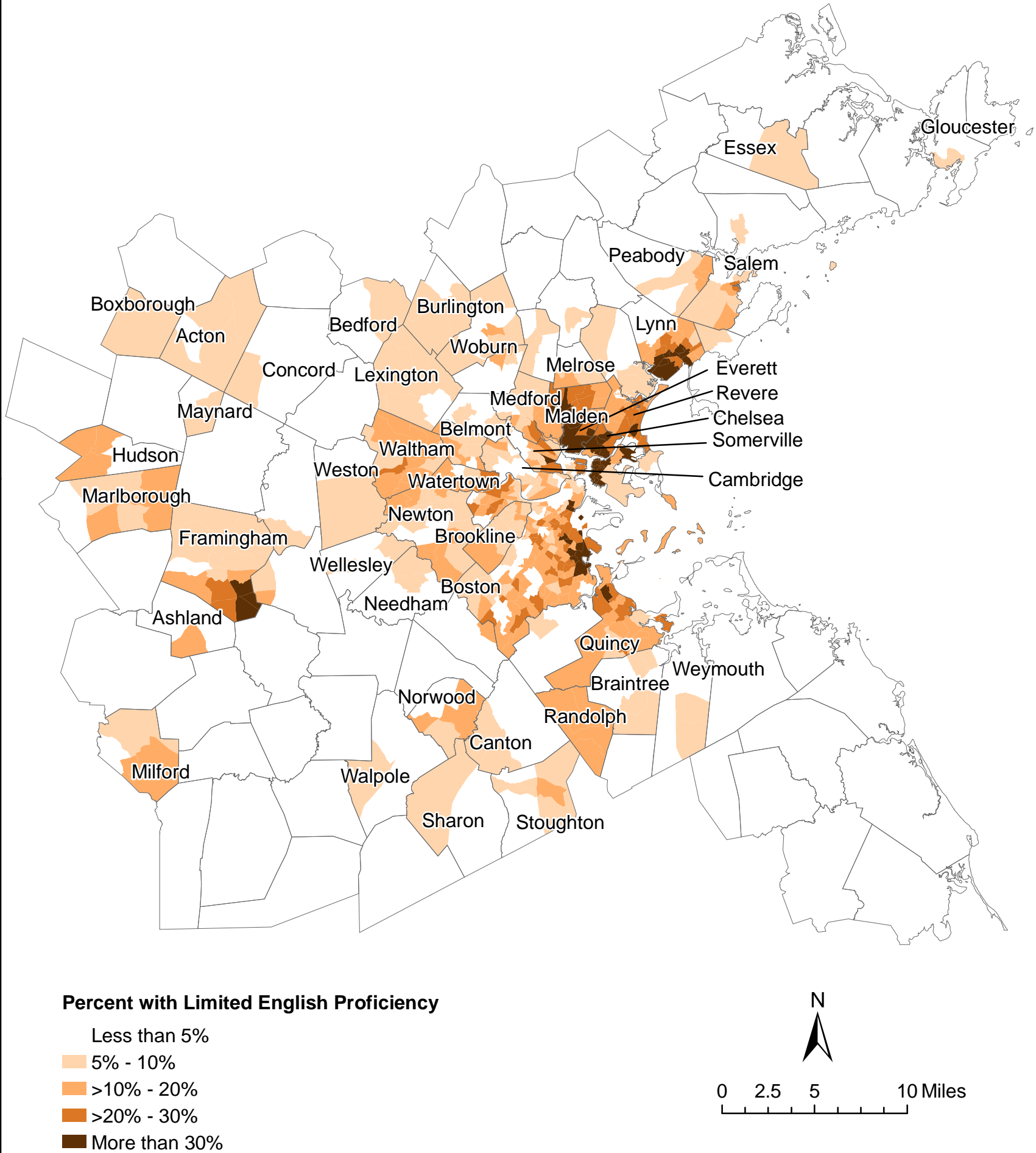
For face-to-face interactions with LEP individuals, training will include language identification "I speak" cards, developed by the US Census Bureau. The phrase "Mark this box if you read or speak [name of language]" appears on these cards in 38 different languages. These are kept at the front desk for use by the

receptionist or any other staff member who needs to identify the primary language of an LEP individual. Also available is a list of staff members who speak languages other than English and are able and willing to serve as translators. Staff that have most frequent contact with the public through MPO and other public meetings, are taught to use phone translation services, how to engage translators for meetings, and obtain written translations.

The *CTPS Nondiscrimination Handbook* provides MPO staff with information about all types of accommodations and establishes protocols for using them.

Geographic units in this map are U.S. census tracts from the 2010 Census.

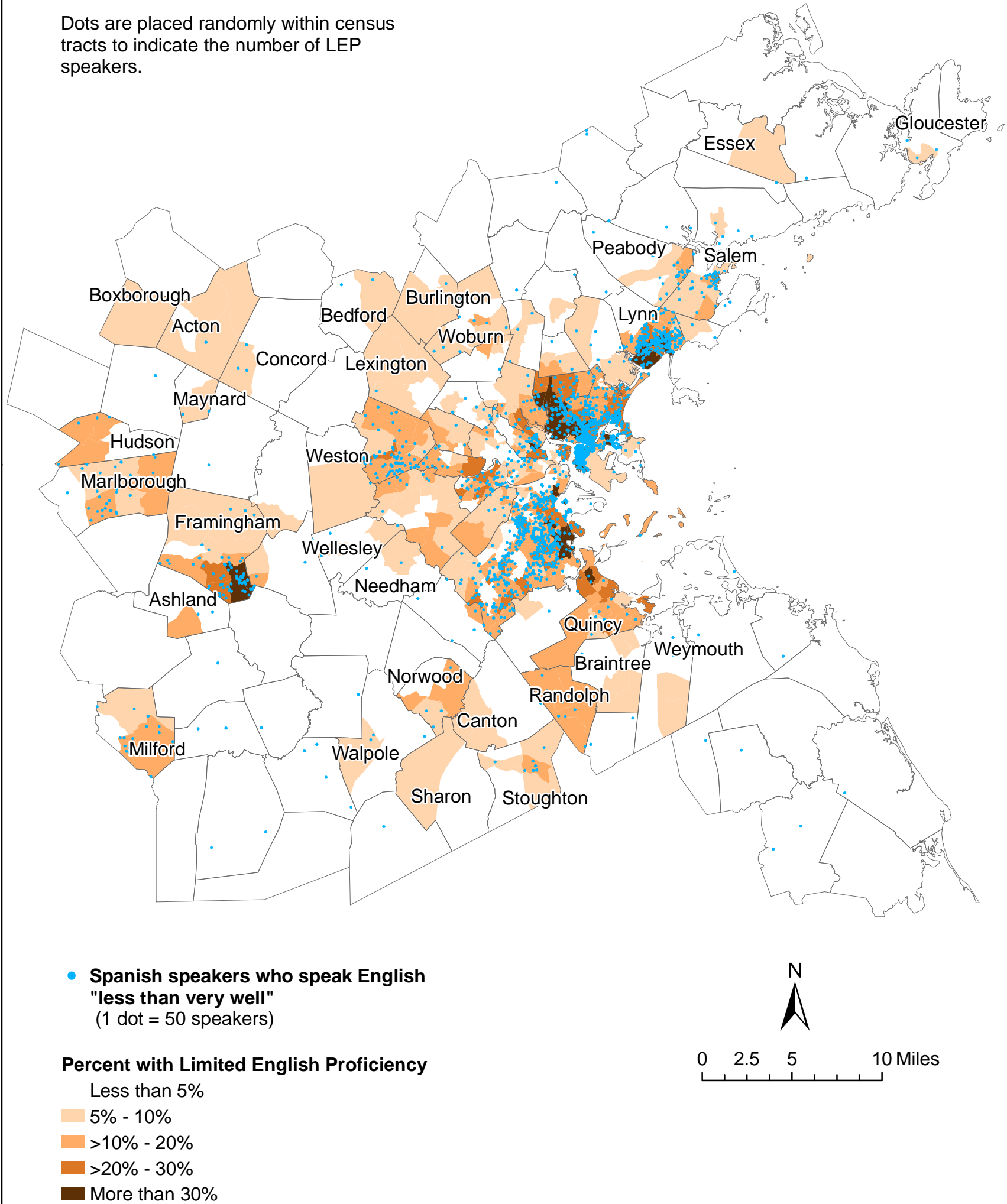
Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

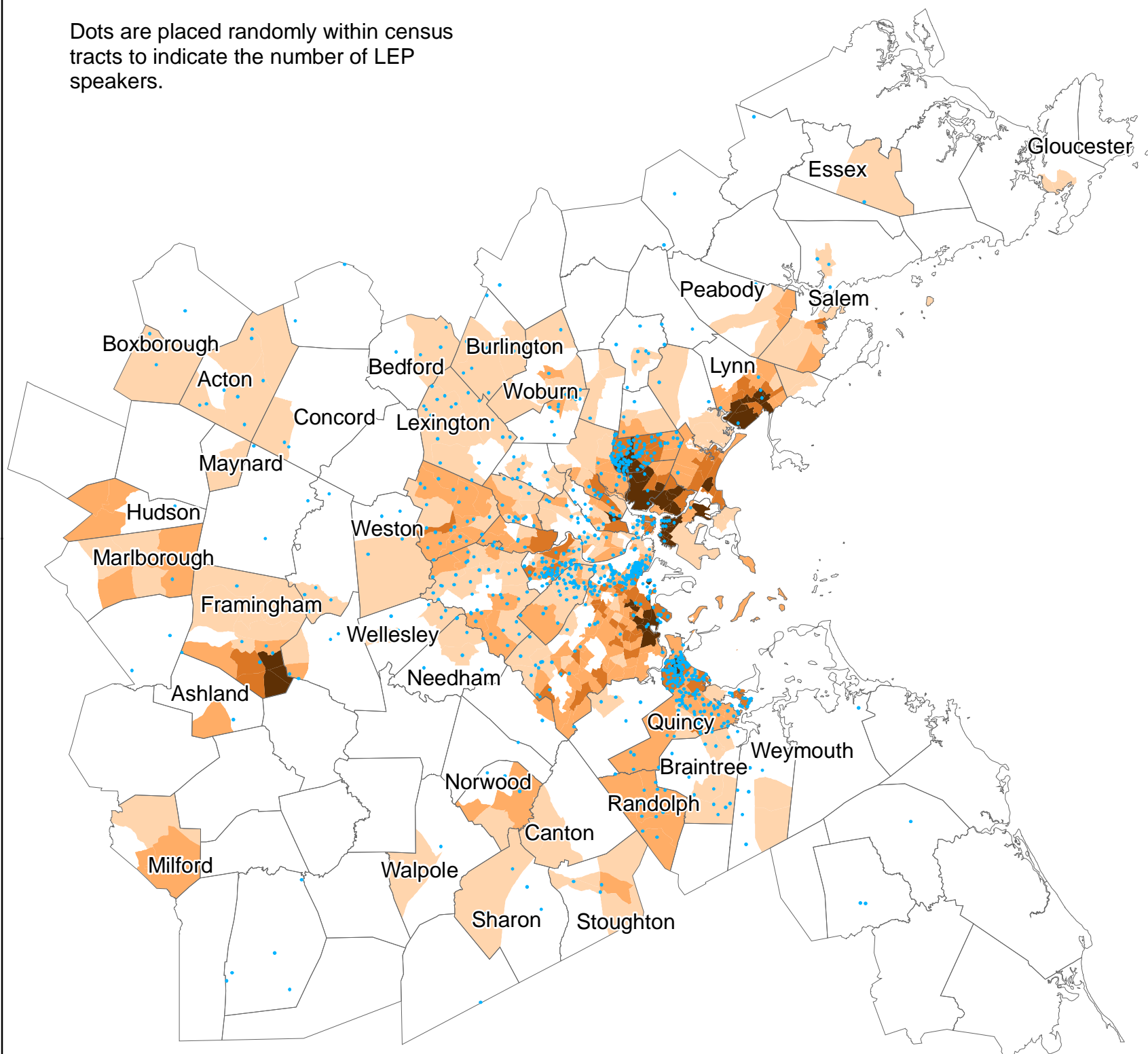
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

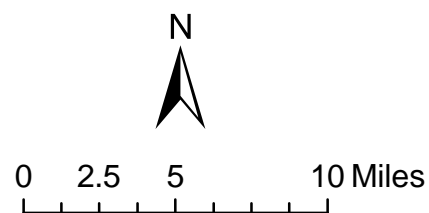
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



● Chinese speakers who speak English "less than very well" (1 dot = 50 speakers)

Percent with Limited English Proficiency

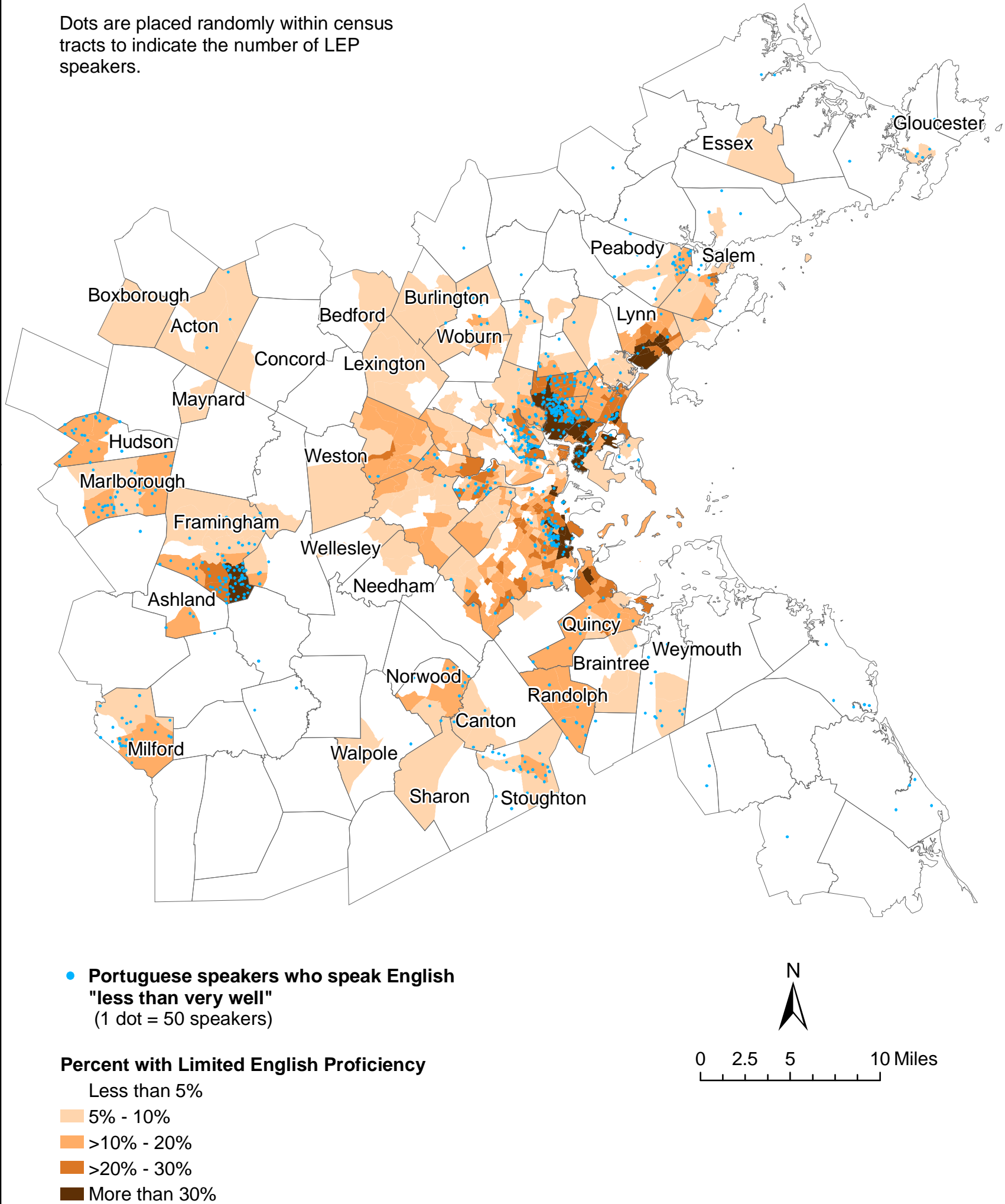
- Less than 5%
- 5% - 10%
- >10% - 20%
- >20% - 30%
- More than 30%



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

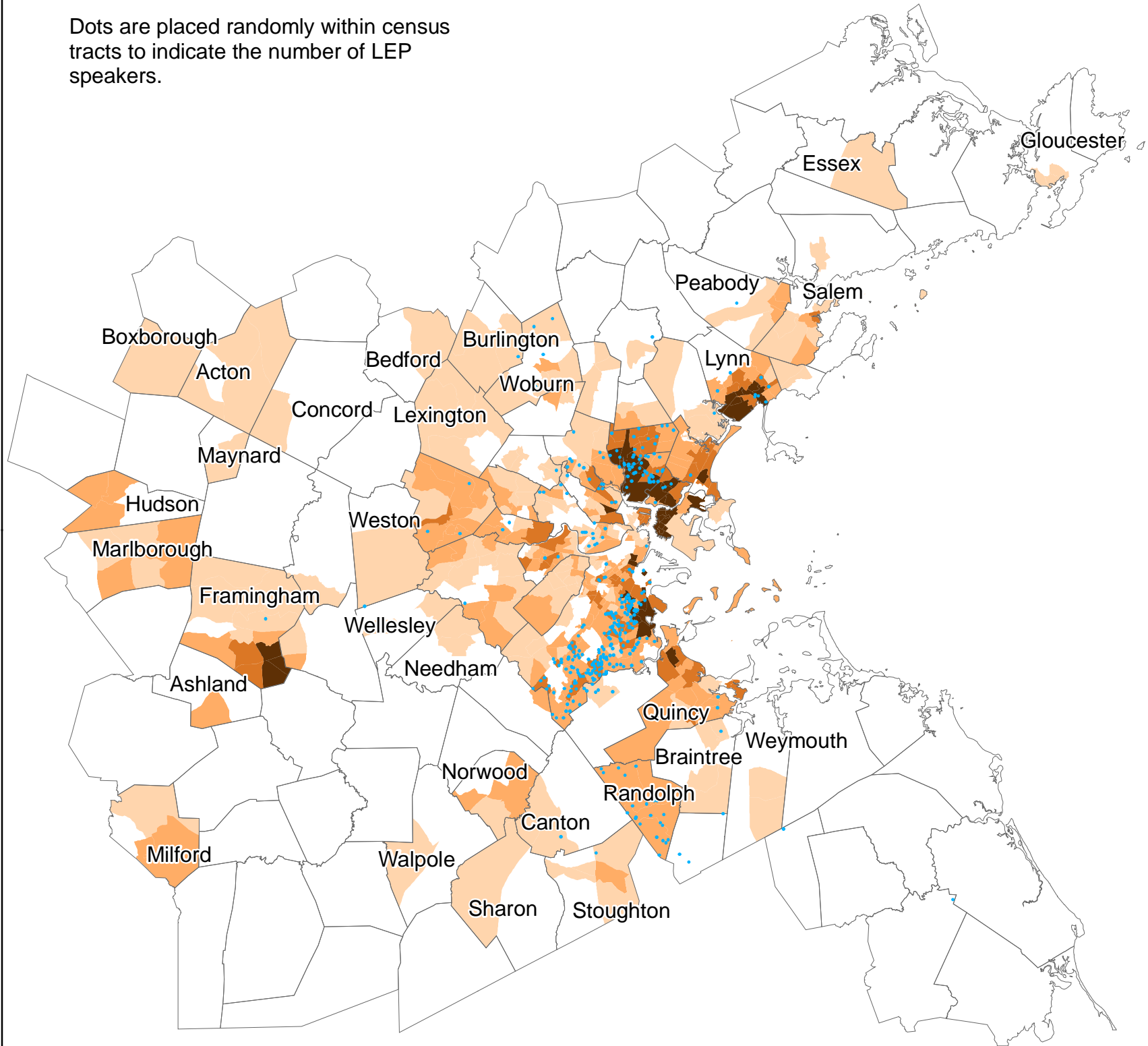
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

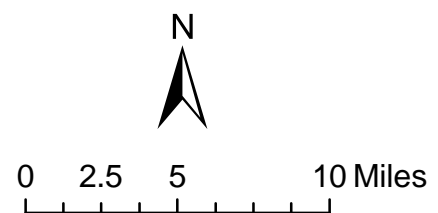
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



• **French Creole speakers who speak English "less than very well"**
(1 dot = 50 speakers)

Percent with Limited English Proficiency

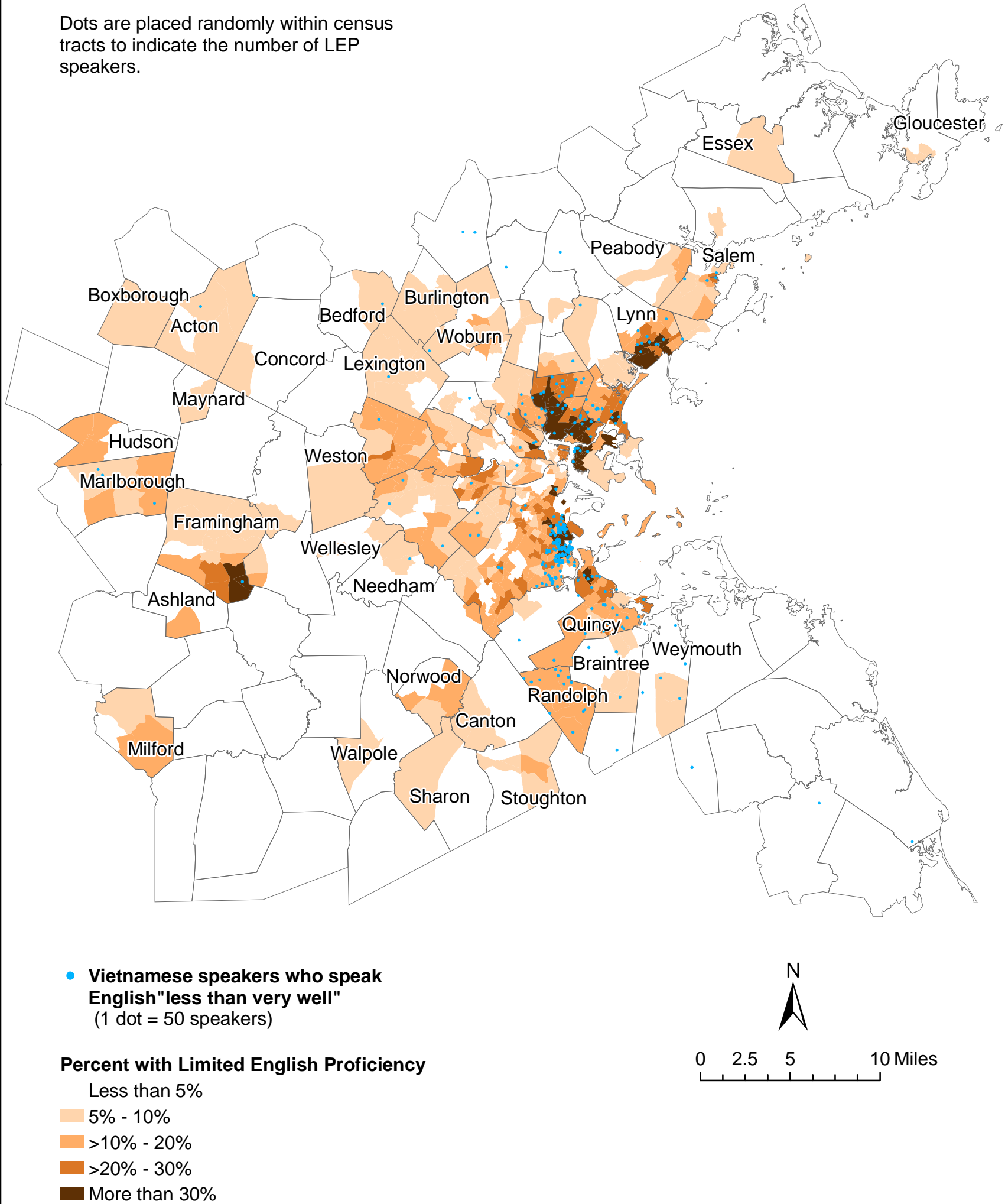
- Less than 5%
- 5% - 10%
- >10% - 20%
- >20% - 30%
- More than 30%



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

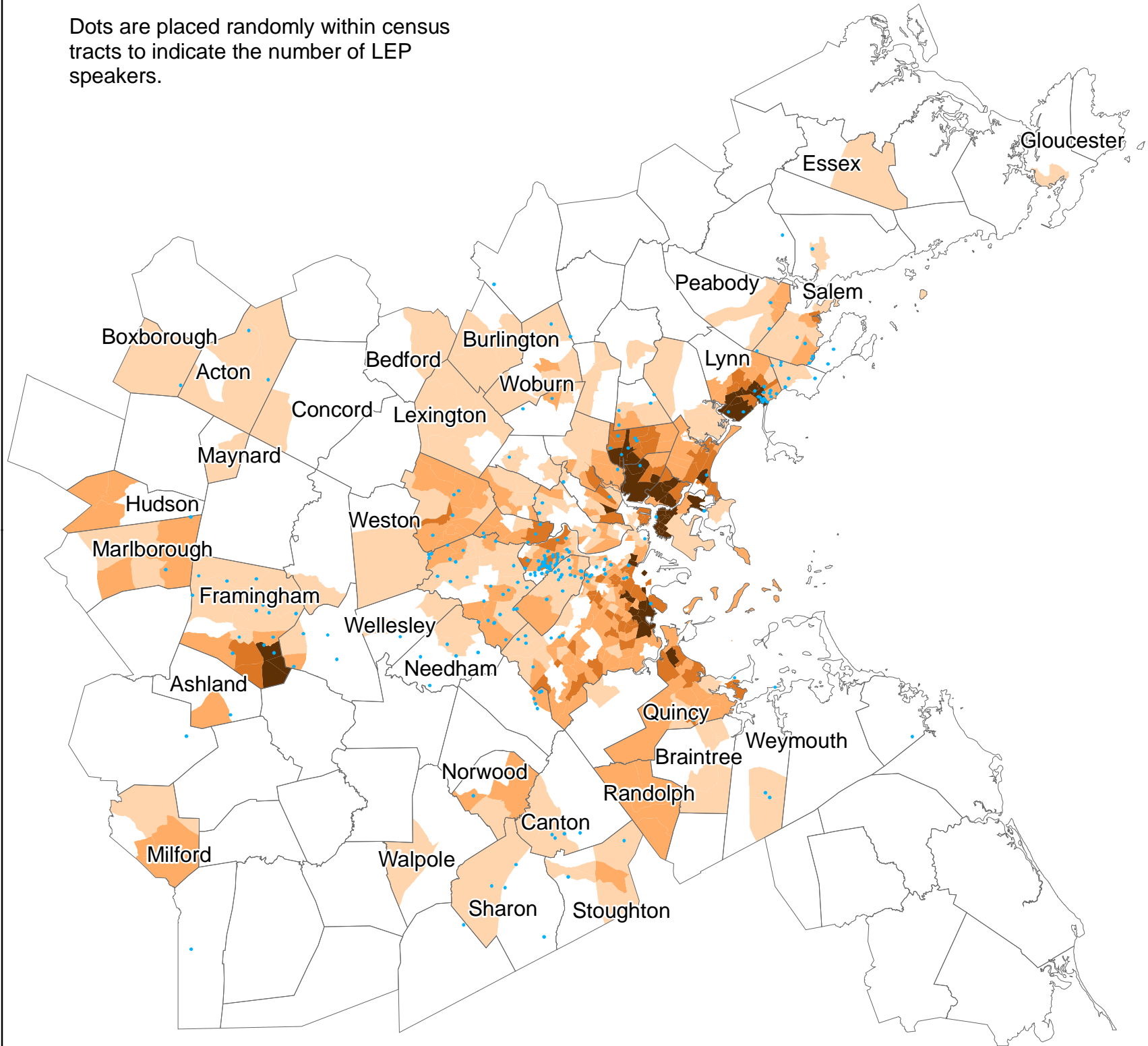
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



Geographic units in this map are U.S. census tracts from the 2010 Census.

Residents with limited English proficiency are defined for Federal Transit Administration Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2012 American Community Survey (ACS) five-year summary file.

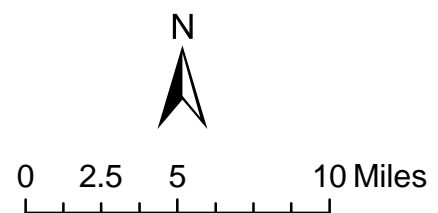
Dots are placed randomly within census tracts to indicate the number of LEP speakers.



● Russian speakers who speak English "less than very well" (1 dot = 50 speakers)

Percent with Limited English Proficiency

- Less than 5%
- 5% - 10%
- >10% - 20%
- >20% - 30%
- More than 30%



Appendix C—Accessible Meeting Checklist

BOSTON REGION MPO ACCESSIBLE MEETING CHECKLIST

The checklist below should be completed by the person responsible for selecting and reviewing the meeting location to ensure that it meets all accessibility requirements.

Type/Purpose of Meeting: _____

Meeting Date: _____

Meeting Time: _____

Location: _____

Meeting Planner: _____

Publicizing the Meeting

- Has the public meeting been publicized at least three weeks in advance?
- Has the meeting been publicized in the required foreign languages and ethnic newspapers for the relevant populations in the community where the meeting will be held?
- Does the public meeting notice include accessibility information, how to request a reasonable accommodation, relevant dates for making requests, and who to contact to request a reasonable accommodation?
- Does the public meeting notice include information about how to request foreign language interpreters?

Evaluating the Meeting Location:

Evaluator: _____

Date of Evaluation: _____

- Where applicable (in areas where public transportation is available), is the meeting location one-quarter mile or less from the nearest accessible bus stop or rail station? Or, is transportation provided from the stop/station to the meeting location?
- Where applicable, is there an accessible path of travel provided from the public transportation stop to the meeting location and meeting room?

- If parking will be available at the meeting location, will there be accessible spaces (review number of car and van accessible spaces)?
- Is there an accessible path of travel provided from the accessible parking area to the meeting area?
- If the main entrance to the building is not accessible, is there directional signage pointing towards the accessible entrance?
- Is the accessible entrance unlocked and able to be used independently? If the meeting is taking place at night, is the path leading to the alternate entrance well lit?
- If there are restrooms that are open to the public, is there a pair of accessible restrooms available within close proximity of the meeting area? If not, is there at least one accessible gender-neutral restroom?
- If there are public phones, is there at least one accessible (TTY and within appropriate height range) telephone available?
- If a stage or platform will be used during the meeting, is it accessible?
- If a podium will be used during the meeting, is the podium height adjustable? If not, is there a small table (between 28 and 34 inches high) provided at the side of the podium?
- Is there a high-speed internet connection within the meeting space?

Ensuring Appropriate Accommodations

- Have sign language and foreign language interpreters, if requested, been reserved for the public meeting?
- Have CART services, if requested, been reserved for the meeting?
- Are assistive-listening devices available for the meeting? Does someone know how to use the device? Have you checked the devices at least 24 to 48 hours before the meeting and rechecked them immediately before the meeting starts? (Note: For large meetings, to avoid the loss of equipment, it is reasonable to ask for a driver license or other ID as collateral.)
- Are at least five large-print copies of meeting handouts available?
- Are printed materials available upon request, in alternative formats and/or relevant foreign languages?
- Are film or video presentations closed captioned and audio described?

Facility/Room Setup (prior to meeting)

- If the main entrance to the building is not accessible, is the accessible entrance unlocked?

- Is there an integrated seating area in the meeting room for individuals who use a wheeled-mobility device?
- Is seating available for attendees who are deaf or hard of hearing, and who have requested an accommodation, near the front of the meeting room so that attendees may see the interpreter/captioner, or lip read?
- Is there an appropriately lit area in the front of the room for sign/foreign language interpreters and/or CART providers?
- Are the aisles at least three feet wide and clear of obstacles or tripping hazards?
- If microphones are used during the meeting, are adjustable microphone stands available for attendees? Can staff be used as floaters with microphones as an alternative?

Appendix D—MPO Public Participation Plan

Appendix E—Accessible Parking Factsheet



National Network

Information, Guidance and Training on the Americans with Disabilities Act

Call us toll-free
1-800-949-4232 V/TTY

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Accessible Parking

The U.S. Department of Justice (DOJ) issued new regulations under the Americans with Disabilities Act (ADA) in 2010. The new rules affect state and local governments (Title II of the ADA), as well as public accommodations and commercial facilities (Title III). The regulations include the new 2010 ADA Standards for Accessible Design, outlining minimum accessibility requirements for buildings and facilities.

Existing Facilities

New construction projects must meet minimum standards with very few exceptions; alterations are also subject to strict requirements, although they may be more affected by existing structural conditions. Existing buildings and facilities which are not undergoing planned alterations are viewed a little differently.

Title II: Program Access

State and local government agencies that offer programs, services, or activities in existing facilities need to make sure that people with disabilities can gain access and participate in these activities. There are a variety of ways that agencies can ensure access to programs, but making structural improvements is often necessary.

Title III: Barrier Removal

Both commercial facilities and public accommodations must follow standards for new construction and alterations. Additionally, public accommodations (private businesses that are open to the general public, like retail stores, restaurants, banks, parking garages, and many others) must remove barriers when it is “readily achievable” to do so; readily achievable means

“easily accomplishable and able to be carried out without much difficulty or expense.” Designating accessible parking is often readily achievable, and is considered a top priority because it enables many people with disabilities to “get in the door.”

Safe Harbor

The 2010 regulations include a “safe harbor” for features that already comply with the 1991 standards, but may not meet the new 2010 standards. *For example:* A retail store’s parking lot has a total of 250 parking spaces; in compliance with 1991 standards, the lot includes seven accessible spaces, one of which is van-accessible. The 2010 standards would require two van-accessible spaces, but the store does not have to modify its parking lot to provide the additional space until the lot undergoes a planned alteration (re-stripping, re-surfacing, etc.) after March 15, 2012. If the lot is altered after that time, it will then be brought into compliance with the 2010 standards, to the maximum extent feasible.

How many accessible parking spaces are needed?

One of every six accessible parking spaces, or fraction thereof, must be “van-accessible.” For example: A parking lot with 400 total spaces needs eight accessible spaces, and two of those eight spaces must be van-accessible.

Accessible spaces must connect to the shortest possible accessible route to the accessible building entrance or facility they serve.



Total Number of Parking Spaces in Parking Facility (Lot or Garage)	Minimum Number of Accessible Parking Spaces Required
1 - 25	1
26 - 50	2
51 - 75	3
76 - 100	4
101 - 150	5
151 - 200	6
201 - 300	7
301 - 400	8
401 - 500	9
501 - 1000	20, plus 1 for each 100, or fraction thereof, over 1000

Where a parking facility serves multiple buildings or accessible entrances, accessible parking spaces should be dispersed to enable people to park near as many accessible entrances as possible. *For example:* A shopping center has fifteen stores, each with a separate entrance. There is one large parking lot with 1000 spaces. The twenty accessible parking spaces should be dispersed to provide some options for people to park close to the different stores.

Where separate parking facilities serve the same building or entrance, accessible spaces may be grouped together, as long as the number of spaces provided is determined according to each of the separate parking facilities. *For example:* A sports stadium has an adjacent parking lot with 1000 spaces and a separate parking lot several blocks away with an additional 1500 spaces. The adjacent lot needs 20 accessible spaces (four of which need to be van-accessible), and the

remote lot needs 25 accessible spaces (five of which need to be van-accessible). Since accessible spaces need to be as near as possible to the facilities they serve, the 45 accessible spaces (including nine van-accessible) can be located in the lot adjacent to the stadium.

Medical Facilities

Certain types of medical facilities need more accessible parking.

- Hospital outpatient facilities need **10%** of patient/visitor spaces to be accessible.
- Rehabilitation facilities that specialize in treating mobility-related conditions and outpatient physical therapy facilities need **20%** of patient/visitor spaces to be accessible.

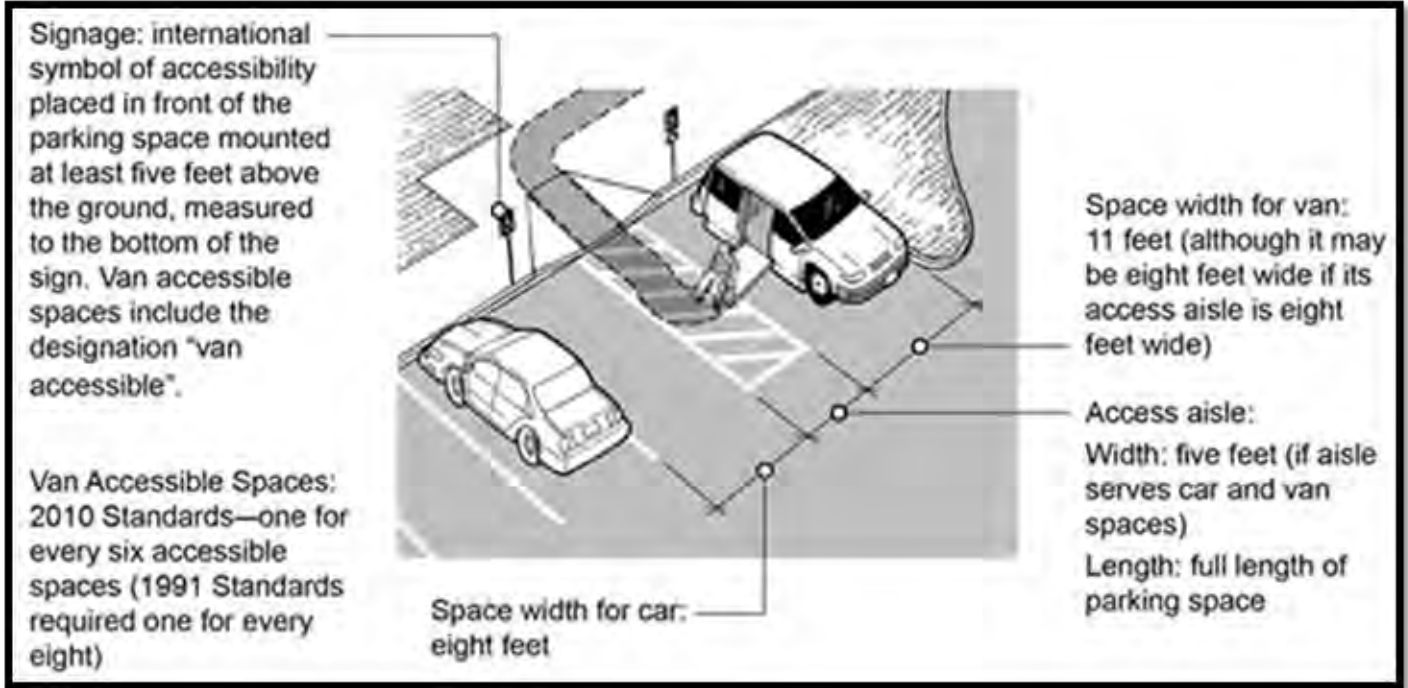
The number of van-accessible spaces is still one of every six accessible parking spaces, or fraction thereof.

For example: An outpatient physical therapy facility has a parking lot with 50 total spaces for employees only. Following basic requirements, that lot will need two accessible spaces, one of which will be van-accessible. A separate lot with 200 total spaces is provided for patients and visitors; this lot will need 40 accessible spaces, seven of which will be van-accessible.

Exceptions

- Parking facilities that are used exclusively for buses, trucks, delivery vehicles, law enforcement vehicles, and vehicular impound are not required to include accessible spaces, but if such lots are accessed by the public (e.g. impounded vehicle retrieval) then an accessible passenger loading zone must be provided.

What do accessible parking spaces look like?



Dimensions (all dimensions are minimums):

Accessible parking spaces are eight (8) feet wide; van-accessible spaces are eleven (11) feet wide. Access aisles for either type of space are five (5) feet wide. These adjacent aisles, which can be shared between two spaces, provide room for individuals to deploy vehicle-mounted wheelchair lifts and/or unload and use mobility devices such as wheelchairs, walkers, etc. An alternate design allows a van-accessible space to be eight (8) feet wide if the adjacent access aisle is also eight (8) feet wide.

Access aisles must be marked (e.g., painted with hatch marks) to discourage parking in them. This is especially important where the alternate design is used and an access aisle at a van-accessible space is the same size as the space.

The surface of accessible spaces and access aisles must be smooth, stable, and virtually level in all directions to ensure safe use for people with disabilities, including those who must load, unload, and use wheeled mobility devices.

Additionally, van-accessible spaces, their associated access aisles, and the vehicular routes serving them must provide vertical clearance of at least 98 inches to allow for the height of typical wheelchair lift-equipped vehicles.

Signs

Accessible parking spaces must be identified by signs that include the International Symbol of Accessibility. Signs at van-accessible spaces must include the additional phrase "van-accessible."

Signs should be mounted so that the lower edge of the sign is at least five (5) feet above the ground. This helps ensure visibility both for motorists and local enforcement officials.

Exceptions

- Parking lots that have four or fewer total spaces do not need to designate the accessible space with a sign. This means that for the purposes of local enforcement (at least in most jurisdictions), anyone, with or without a disability, can park in the accessible space. This is intended to excuse very small entities from having to reserve 25% to 100%

of their available parking for individuals with disabilities.

- Residential facilities where parking spaces are assigned to specific dwelling units are also exempt from the requirement to post signs at accessible spaces.

Note that these two exemptions are only related to signs; accessible parking spaces must still be provided in appropriate numbers and with other required features (minimum width, etc.).

Maintenance

It is important that accessible features be maintained, and outdoor spaces can be especially challenging because of weather and other conditions. Accessible parking spaces, aisles, and routes should be maintained in good repair and kept clear of snow, ice, or fallen leaf build-up.

Other Laws, Other Requirements

The ADA establishes these requirements to ensure that when parking facilities are provided by entities covered by Title II or Title III, accessible spaces with certain features are available. Many state and local governments

have their own requirements, which may be more specific or more stringent in some ways.

Each state also establishes criteria and procedures to issue accessible parking permits (often in the form of distinctive license plates or placards) to individuals with disabilities. Enforcement activities related to these issues (fraudulent use of permits, illegal parking in accessible spaces, etc.) are typically carried out by state and local authorities, such as city police departments.

Other requirements may be relevant in different situations or under different laws. For example, the Fair Housing Act requires covered housing providers to make “reasonable accommodations” for residents with disabilities, which could mean reserving a parking space for a specific individual.

Content was developed by the Mid-Atlantic ADA Center, and is based on professional consensus of ADA experts and the ADA National Network.



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Appendix F—I Speak Language Identification Flashcard

- | | | |
|--------------------------|--|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Խոսողո՞ւմ ե՞սք նշո՞ւմ կատարե՞ք այս քանակուսու՞մ, եթե խոսո՞ւմ կա՞մ կարո՞ւմ ե՞ք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید. | 12. Farsi |

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

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