

Mid-Rivers Telephone Cooperative, Inc. (“Mid-Rivers”) and its subsidiary are committed to ensuring that persons with limited English proficiency (LEP) have meaningful access to programs and activities conducted by Mid-Rivers Telephone Cooperative, Inc. in accordance with Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” (“The Executive Order.”)

The Executive Order requires recipients of Federal financial assistance to provide meaningful access to eligible persons. The LEP initiative seeks to eliminate language barriers that prevent eligible persons from having meaningful access to Rural Development assisted programs. LEP includes persons eligible for participation in Rural Development assisted programs who do not speak English at all or very well. LEP does NOT include hearing or visual impairments, Sign Language interpreters or Braille, or issues of literacy.

#### Needs and Capacity Assessment

Based on our 4-Factor Analysis, Mid-Rivers has found that within our service territory there are less than 1,000 LEP persons eligible for our services<sup>1</sup>. Mid-Rivers has determined the most prevalent language spoken by LEP persons is Spanish.<sup>2</sup> Mid-Rivers has determined the frequency with which LEP persons come into contact with our services is rare to non-existent. Mid-Rivers acknowledges the importance of providing telecommunications services to all subscribers in our service area, and strives to adequately serve all persons. Due to our sparsely-populated service area, the resources for translation and interpretation are severely limited and cost-prohibitive.

If Mid-Rivers Telephone Cooperative, Inc. identifies a need for oral interpretations, we will evaluate the cost effectiveness of offering video remote interpreting to ensure LEP needs are met.

#### Written Translations

Due to the minimal eligible population of LEP groups in our service area, we do not provide written translation at this time. If Mid-Rivers Telephone Cooperative, Inc. deems a need for written translations, we will take the necessary action to ensure LEP needs are met at that time.

#### Staff training

Each department will train front-line and managerial staff on the policies and procedures of its language assistance activities.

#### Assessing accessibility and quality

Each department will assess the accessibility and quality of language assistance services. Procedures and directives will be revised on a bi-annual basis.

Each department is responsible for reporting service limitations related to LEP persons to management. Given the disparate activities and area of focus within the company, it will be incumbent upon each department to determine the threshold needed for its services and report these to management.

Employees shall adhere to LEP Plans to ensure that LEP persons are provided meaningful access to Mid-Rivers Telephone Cooperative, Inc.’s services.

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1 U.S. Census Bureau- Reports at Least 350 Languages Spoken in U.S. Homes(November 3, 2015) Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for States: 2009-2013

2 [https://www.lep.gov/maps/2012/county/MT\\_cnty\\_LEP.ACS\\_5yr.2012.pdf](https://www.lep.gov/maps/2012/county/MT_cnty_LEP.ACS_5yr.2012.pdf)