



LIMITED ENGLISH PROFICIENCY (LEP)



LANGUAGE ACCESS PLAN[®] FOR SAWNEE EMC

April 2023

SAWNEE EMC

LIMITED ENGLISH PROFICIENCY LAP

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INTRODUCTION AND BACKGROUND

Sawnee EMC is a non-profit, member owned, electric cooperative that provides reliable, competitively priced retail electric service to its members.

Sawnee has a diverse seven (7) county service area located northeast of Atlanta and provides dependable electricity service to over 171,000 member-consumers. Maintaining 12,900 miles of distribution facilities, answering approximately 900 calls a day, and processing an average of 9,696 payments per day, Sawnee exemplifies superior abilities to serve its members with ease and convenience.

Sawnee EMC is actively involved in the communities they serve...the communities in which the employees live and work. Sawnee's dedication to providing a higher quality of life in its service area is measured only by the satisfaction of the members.



Consistent with its dedication of serving a diverse membership, Sawnee EMC is committed to ensuring effective communication with Limited English Proficiency ("LEP") persons within its eligible service population. LEP persons are defined as individuals who do not speak English as their primary language, and who have a limited ability to read, speak, write, or understand English. Sawnee EMC recognizes its responsibility to communicate effectively with LEP persons, and to ensure their access to the services and benefits provided by the Cooperative.

Accordingly, this LEP Plan will serve to affirm Sawnee EMC's commitment to LEP persons, as well as to outline the steps Sawnee EMC has taken to identify and assist such individuals; to train Cooperative staff; to provide notice of available services; and to monitor and update this Plan as circumstances require.

STATEMENT OF POLICY

It is the policy of Sawnee EMC to provide timely, meaningful access for LEP persons to all Cooperative services, programs, and activities. All Sawnee personnel shall provide “free” language assistance services to LEP individuals whom they encounter, or whenever an LEP person requests language assistance services from Sawnee.

All Sawnee EMC personnel will inform members of the public that language assistance services are available, free of charge, to LEP persons and that Sawnee EMC will provide these services to them.

Sawnee EMC will also provide training for all personnel to identify and assist LEP persons, and will regularly review this LEP Plan, and perform audits of its effectiveness, in order to ensure the primary goal of communicating effectively with LEP persons is being achieved.



PURPOSE AND AUTHORITY

The purpose of Sawnee EMC's Limited English Proficiency Plan ("Plan") is to establish effective guidelines for the staff of Sawnee EMC to follow when providing services to, or interacting with, individuals who have Limited English Proficiency.

The Plan is also intended to comply with the requirements of Title VI of the Civil Rights Act of 1964, 7 CFR 15, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," as these regulations apply to recipients of Federal funds. Sawnee EMC recognizes that recipients of Federal funds shall not discriminate on the basis of race, color, or national origin; Federal court cases and the United States Department of Justice have determined that this obligation includes providing meaningful access to Federally funded programs to persons with Limited English Proficiency.

On November 28, 2014, the USDA published guidelines in the Federal Register (79 FR 70771) to help those who participate in Federally assisted programs comply with their obligation to provide meaningful access to LEP individuals.

As described above, in keeping with its dedication to serving a diverse membership, Sawnee EMC is committed to ensuring effective and efficient communication with LEP persons within its eligible service population. Further, as a recipient of Federal funding, Sawnee EMC has taken reasonable steps to ensure meaningful access to Cooperative services, information, and assistance. This LEP Plan will describe those steps; however, Sawnee EMC will also continue to work toward greater accessibility for LEP persons (for example, by publication of multilingual documents, or by securing interpretation aids at meetings) as such needs may arise within its eligible service population.

Finally, Sawnee's commitment is reflected in its Limited English Proficiency Plan adoption resolution, adopted by its Board of Directors on November 17, 2016 (See Appendix 1: Resolution of the Sawnee EMC Board of Directors) and as amended, from time to time, as needed.

DETERMINING NEED: FOUR-FACTOR ANALYSIS

The Federal government has established the use of a four-factor analysis for organizations to review when determining steps to take to communicate effectively with LEP individuals. This analysis includes the following considerations:

- **Factor 1:** The number or proportion of LEP persons eligible to be served or encountered in the eligible service population.
- **Factor 2:** The frequency with which LEP individuals come into contact with Sawnee EMC programs, activities, and services.
- **Factor 3:** The importance to LEP persons of Sawnee EMC's programs, activities, and services.
- **Factor 4:** The resources available to Sawnee EMC, and costs associated with different language service options.

In addition, in its controlling publication, "USDA Rural Development LEP Implementation Strategy for Federally Assisted Programs," the United States Department of Agriculture (USDA) has suggested specific steps to be taken within each factor.

To determine the need for LEP services within Sawnee EMC's eligible service area, it has considered the four factor analysis, as well as the steps recommended by the USDA in its guidance. In undertaking this review, Sawnee EMC notes the following thresholds requiring action:

The translation of Vital Documents is required if the applicable U.S. Census data indicates:

- that 1,000 or more in the eligible population in the market area, or among current beneficiaries, are LEP persons; or
- that 5 percent or more of the eligible population or beneficiaries, and 50 or more in number, are LEP persons.

The translated written notice of the right to receive free oral interpretation of documents is required if:

- 5 percent or more of the eligible population or beneficiaries, and fewer than 50 in number, are LEP persons.

No written translation is required if:

- Less than 5 percent of the eligible population or beneficiaries, and less than 1,000 in number, are LEP persons.

Sawnee EMC has determined the presence and number of LEP individuals in its service area by identifying the geographic boundaries of the area served by the Cooperative, and by obtaining the U.S. Census data on the LEP populations in that area.

In addition, Sawnee EMC has interviewed its staff in order to capture anecdotal data of interactions with LEP persons, and to identify additional areas of contact and need.



FACTOR 1

Consider the number or proportion of LEP persons eligible to be served or encountered in the eligible service population.

Step 1: Prior Experiences with LEP Individuals

In analyzing the first step of Factor 1, Sawnee EMC examined its prior experiences with LEP individuals. To this end, the Cooperative reviewed information relating to its interaction with LEP persons in the following capacities:

- **Contact with existing customer base**

Anecdotal evidence indicates that field employees have, on rare occasions, had contact with LEP individuals; however, the majority of contact involves Sawnee EMC's Customer Service Department.

- **Calls to customer service telephone line for program services**

Sawnee EMC utilizes a third-party translation service (Voiance) to translate "on demand" calls from LEP persons that are received in Sawnee's Call Center. Customer Service Representatives are trained to quickly recognize the need for translation services, and are authorized to immediately connect the caller to a Voiance operator for assistance. Voiance supports hundreds of languages and dialects (See Appendix 2: Supported Languages), essentially guaranteeing that LEP callers will be able to effectively communicate with Sawnee EMC's Customer Service Representatives.

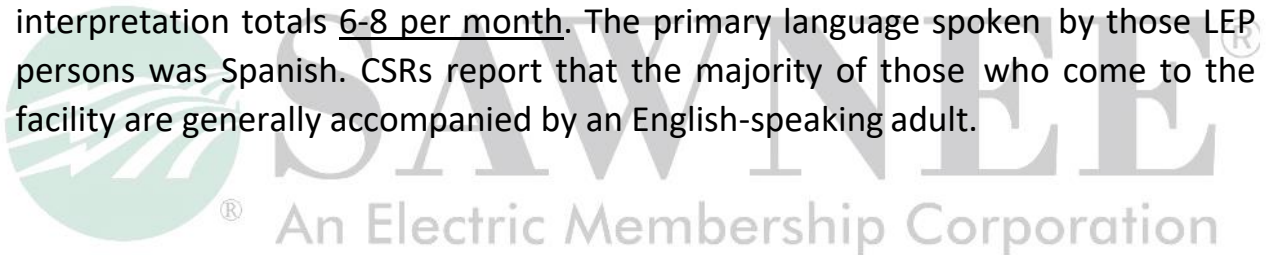
Voiance also maintains records of each call handled, on behalf of the Cooperative, and this information is provided to Sawnee EMC. The identity and frequency of languages spoken by LEP callers offer valuable anecdotal data for the Cooperative in its analysis.

In addition to the logs provided by the third-party translator, Sawnee EMC also employs bilingual individuals in the Call Center. These individuals speak Spanish, and many of the LEP calls from Spanish-speaking individuals were immediately transferred to the bilingual representatives for assistance.

The bilingual Customer Service Representatives were questioned regarding their experiences with LEP persons, and indicated the following regarding the frequency of LEP calls:

- Average number of calls transferred to the Cooperative's bilingual CSR(s) for assistance: ~ 40 per month
- Number of bilingual CSR's: 1 (currently)
- Walk in traffic at SEMC Office

Office employees were interviewed regarding their degree of interaction with LEP individuals. The average number of walk-ins requiring language interpretation totals 6-8 per month. The primary language spoken by those LEP persons was Spanish. CSRs report that the majority of those who come to the facility are generally accompanied by an English-speaking adult.



- **Access to website**

Sawnee EMC has no current data regarding the frequency of visits to its website by LEP individuals. Sawnee EMC has also developed proposed text to be used in communicating LEP services and accessibility to LEP individuals within Sawnee's geographic service area (See Appendix 3: Proposed Website Text)

- **Attendance at meetings, hearings, or other public events hosted by Sawnee EMC**

Although there have been no requests for interpretation services at events or meetings hosted by the Cooperative, Sawnee EMC has ensured that a Spanish-speaking interpreter is present at Directorate Meetings and Annual Meetings.



Step 2: Data from the U.S. Census Bureau; and

Step 3: Identify the geographic boundaries of the area served

In considering the USDA's recommended second and third steps, Sawnee EMC analyzed its eligible service area in conjunction with the corresponding 2010 U.S. Census data. The service area is depicted in **Figure 1**, and is available at Sawnee EMC's website (<https://www.sawnee.com/content/service-area>):

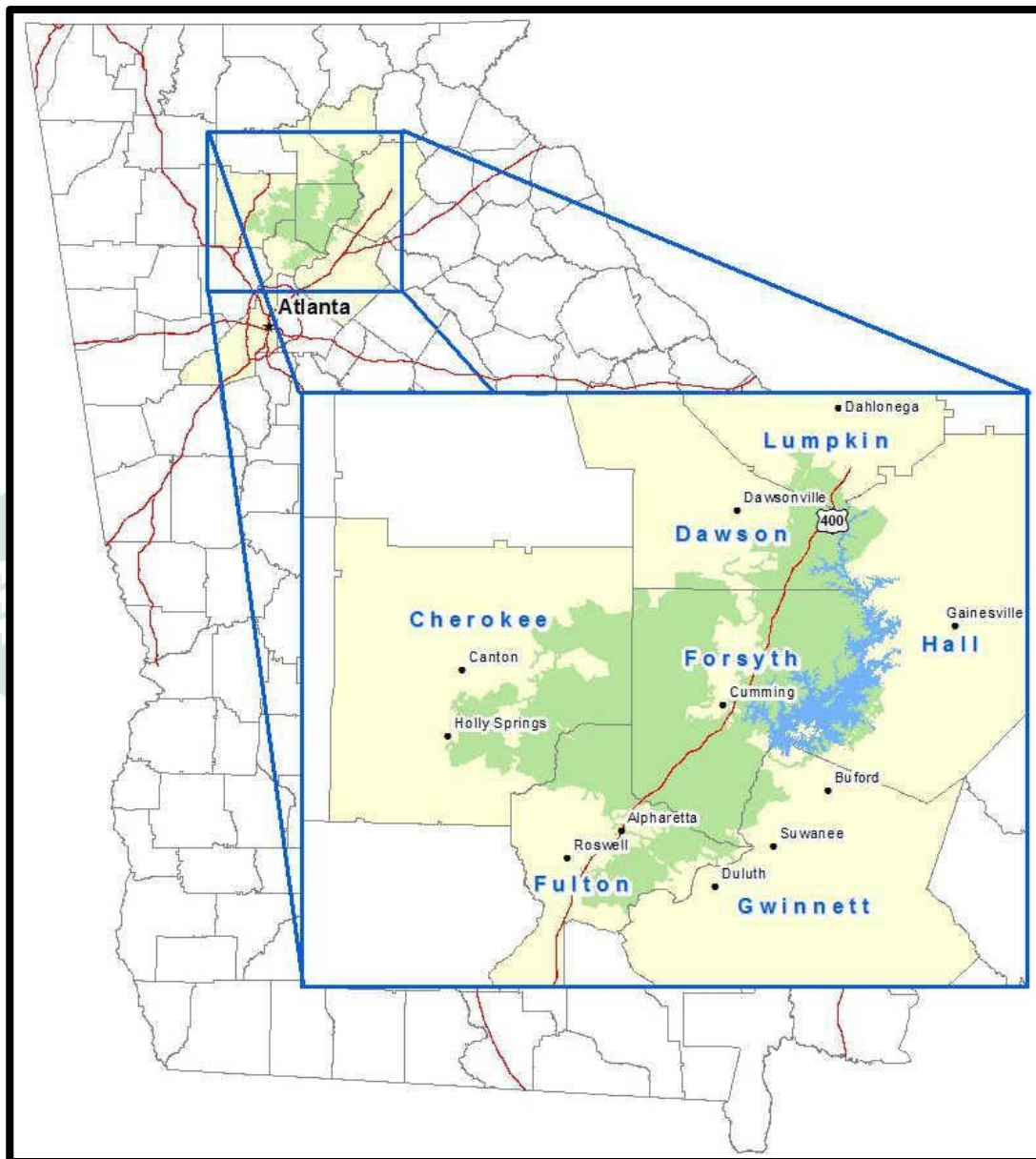


Figure 1: Eligible Service Area

As demonstrated by Figure 1 above, the service area for Sawnee EMC includes portions of Cherokee, Dawson, Forsyth, Fulton, Gwinnett, Hall, and Lumpkin counties.

Sawnee EMC next reviewed the information contained in the 2010 U.S. Census, as well as the Census Bureau's American Community Survey (ACS), maintained at www.census.gov. Consistent with the Safe Harbor Clause of the LEP guidance, this data also served to determine language groups that equal or exceed five percent (5%) of the regional population that are LEP.

The Census data reviewed by Sawnee EMC corresponds to the eligible service area depicted in Figure 1, and includes 90 separate census tracts in its seven county service area (individual census tracts are listed in Appendix 4). According to the ACS data in Table 2, this 90 tract area has a total population of 513,247 individuals. Of these individuals, 413,697 speak only English; 99,550 individuals speak other languages, however, and 35,353 report speaking English "less than very well." These are the individuals who may require LEP services in their interactions with Sawnee EMC employees. (See Appendix 4: Tract Summary and Individual Data)

Step 4: Analysis of Data Collected

In the next step of the first factor, Sawnee EMC used the information obtained in the previous steps to draw conclusions regarding the extent of LEP persons in the eligible service area, and the languages spoken by those individuals. Given the statistical Census evidence presented above, the Cooperative has determined that the following languages constitute those most frequently utilized by LEP persons within the eligible service area:

PRIMARY LANGUAGE	ESTIMATED LEP PERSONS
Spanish or Spanish Creole	15,984
Korean	4,418
Chinese	3,790
Other Asian languages	1,622 ¹
Russian	1,432
Hindi	1,059

Table 1: Primary LEP Languages

¹ The determination of which languages fall into this category will be made on a case by case basis.

This data closely aligns with the anecdotal data collected by Sawnee EMC in the first step of Factor 1, in which it reviewed logs of LEP callers as recorded by the Cooperative's third party translation service; indeed, Spanish, Korean, Chinese (specifically, Mandarin) and Russian were all noted in the records.

Figures 2-7 on the following pages are illustrative of the distribution of the primary languages targeted for assistance by the relevant 2010 U.S. Census tracts. As these maps indicate, Spanish speaking LEP individuals are present throughout the service area, while those who speak other languages (e.g. Korean, Chinese, Russian and other) are concentrated in specific communities within select counties.

Step 5: Outreach

While the 2010 U.S. Census data and anecdotal information are consistent, indicating that the majority of LEP persons have been recognized, Sawnee EMC will continue its efforts to identify any additional LEP populations that may arise in the future.



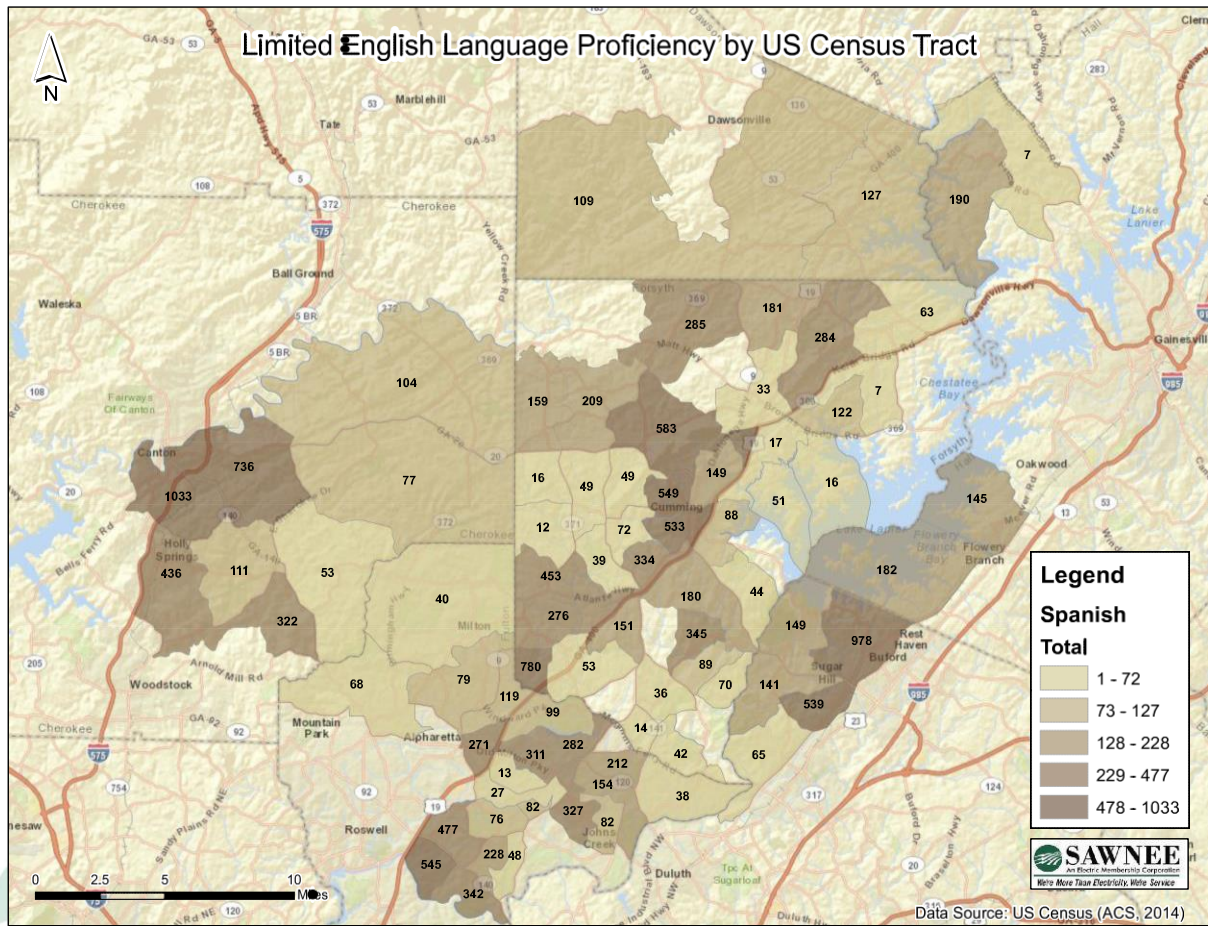


Figure 2: Spanish Census Tracts

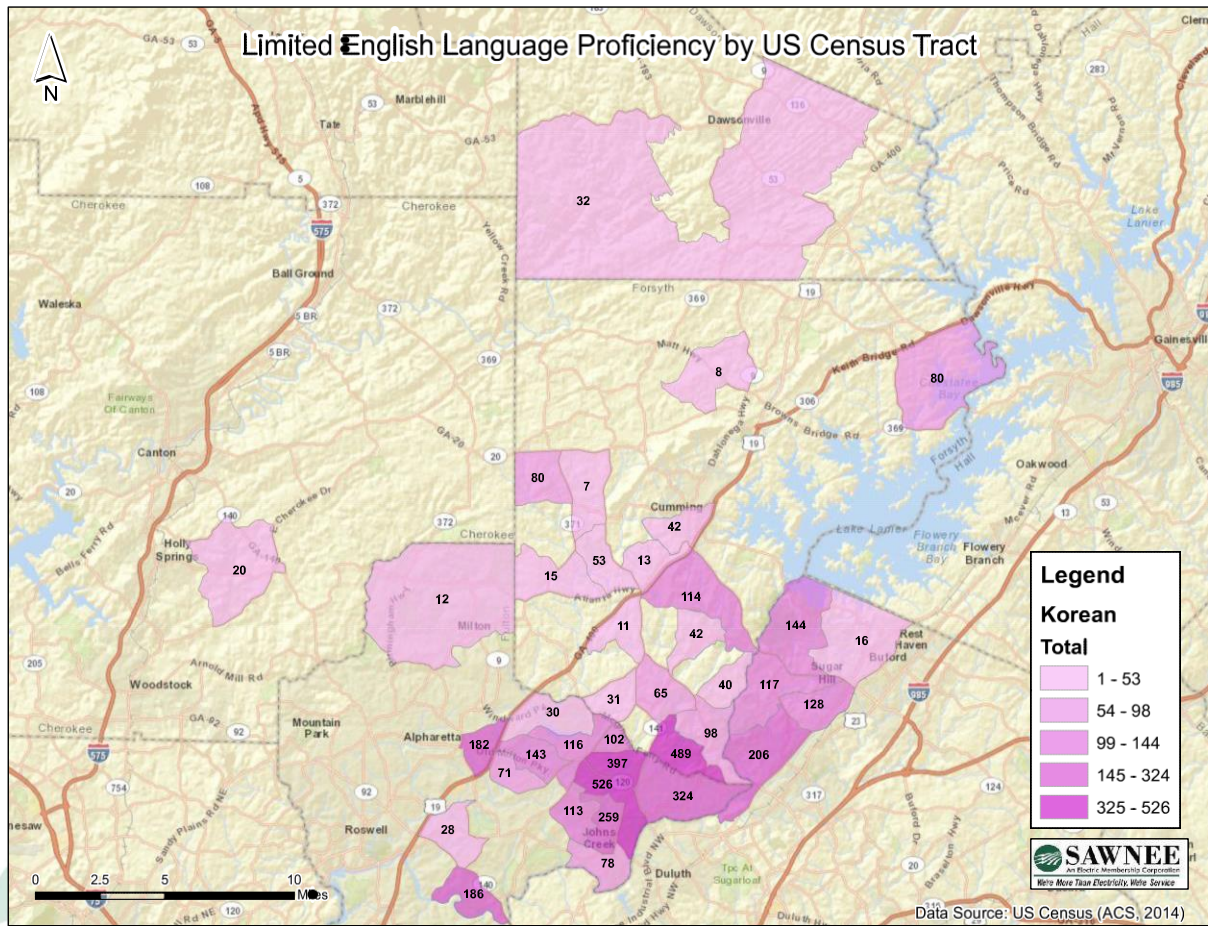


Figure 3: Korean Census Tracts

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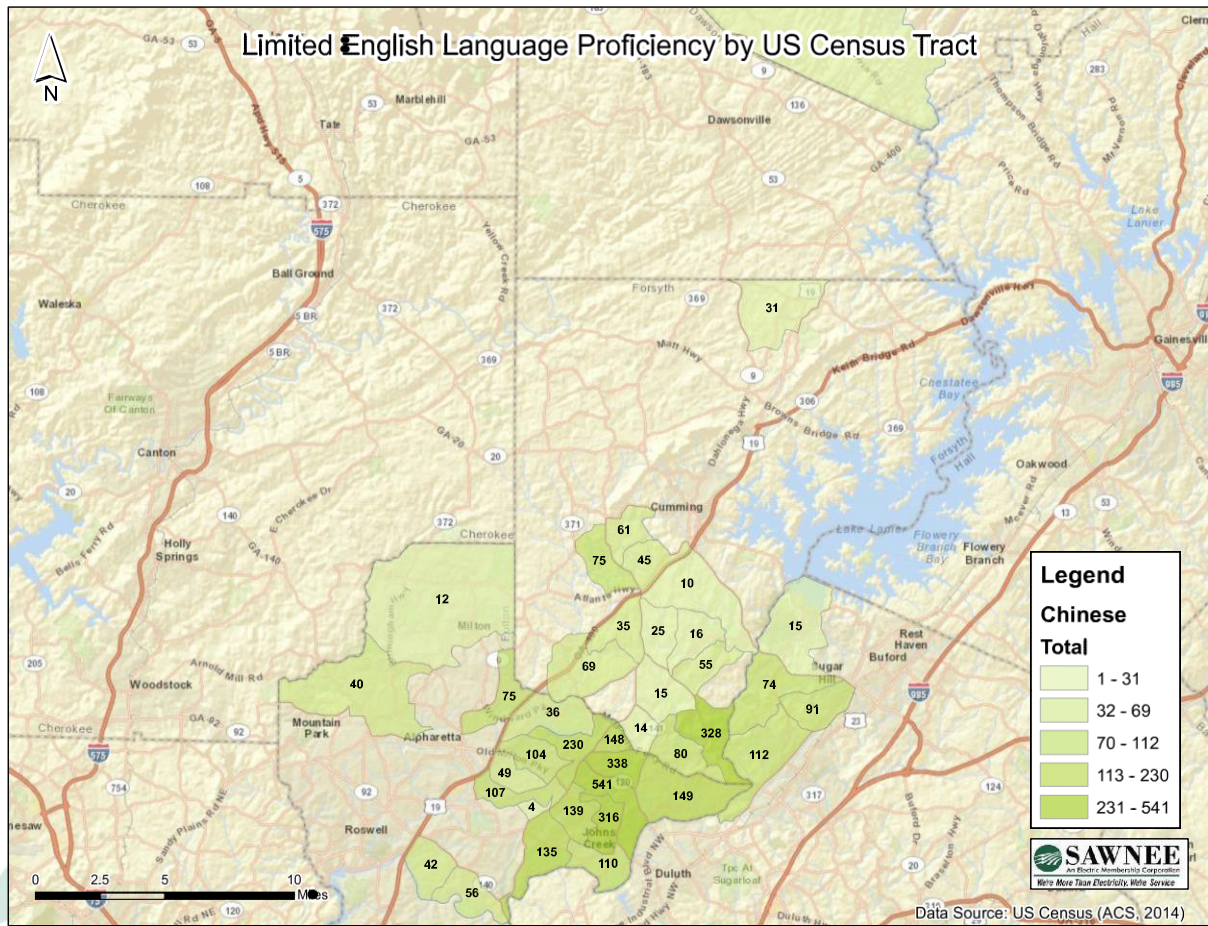


Figure 4: Chinese Census Tracts

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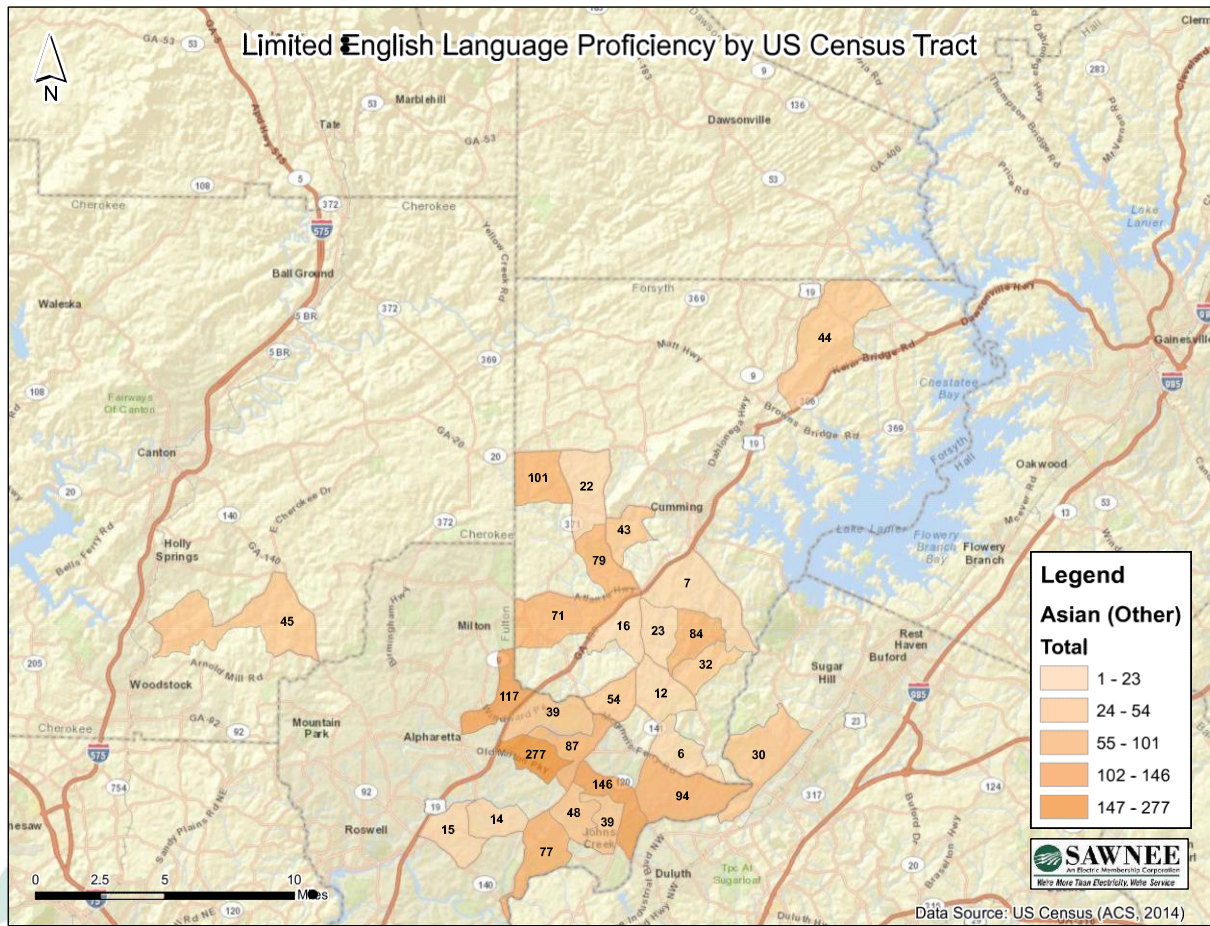


Figure 5: Other Asian Census Tracts

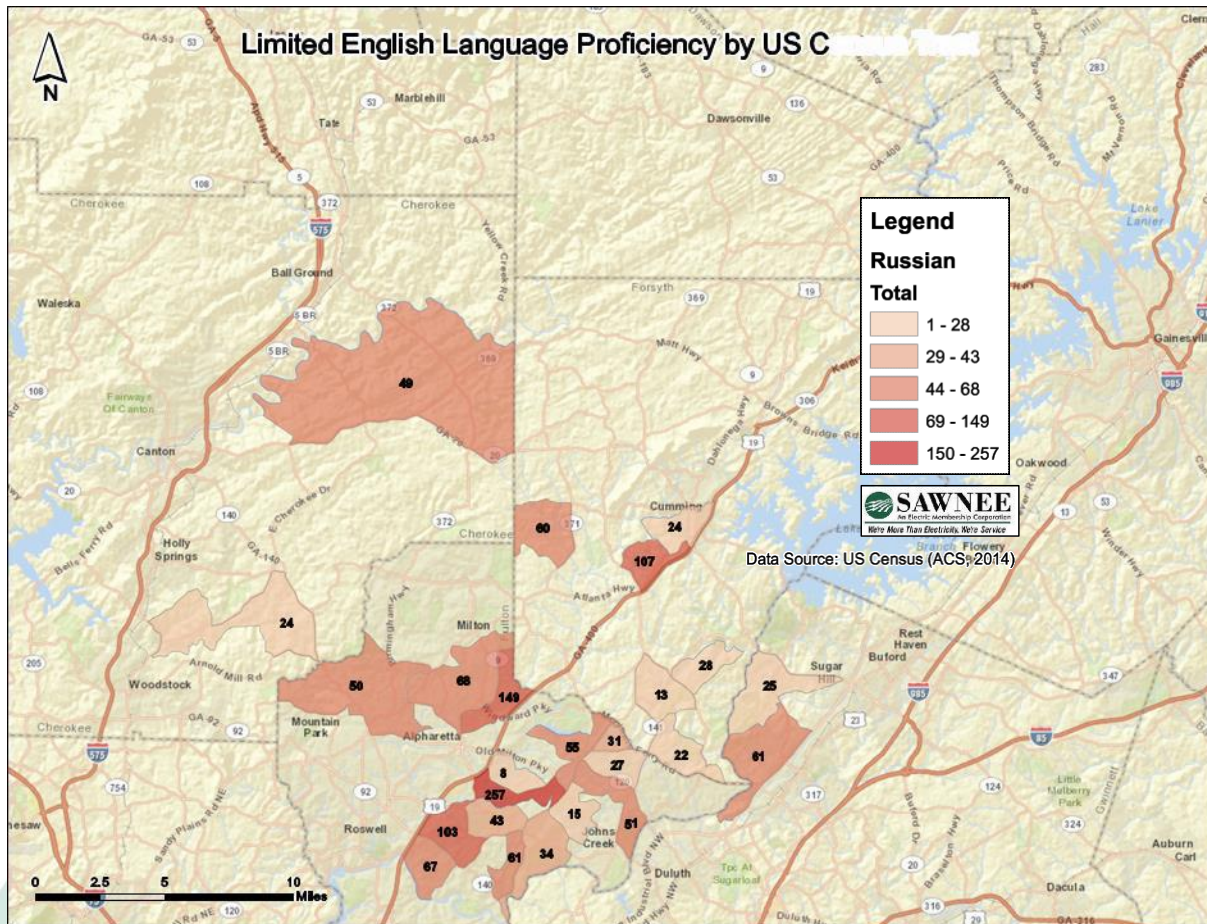


Figure 6: Russian Census Tracts

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Factor 2

The frequency with which LEP individuals come into contact with Sawnee EMC programs, activities, and services.

While Sawnee EMC analyzed the frequency of contact in its analysis of Factor 1, additional information relevant to the implementation of its LEP plan is considered in this step.

Step One: Review the Programs

Sawnee EMC provides electrical service to residential and commercial customers within its defined service area. Customers of the Cooperative are designated as “members,” with the right to vote on various aspects of Cooperative leadership, including its Board of Directors, as well as select bylaw provisions. Sawnee EMC also holds regular Directorate District Meetings and Annual Meetings in order to discuss matters of importance to the Cooperative, as well as inform the members of Cooperative business and operations. Although an interpreter has been made available at these meetings, those services have not yet been needed.

Based on interviews with employees, the most frequent contact with LEP individuals are as follows:

- Requests for reconnection or new service;
- Requests for account balance/payment information.

Step Two: Consult Directly with LEP Persons

As circumstances require, Sawnee EMC will consider engaging in additional outreach to identify any barriers to effective communication with LEP individuals. Additionally, Sawnee EMC will institute a Policy (See Appendix 5: Policy 421 – Limited English Proficiency Program) that sets forth a reporting mechanism for any qualifying LEP individual to use if faced with a barrier to effective communication with the Cooperative and/or its staff.

The policy also identifies the existence of an LEP Compliance Officer, whose responsibilities include, among other actions, the investigation of any LEP related complaints; the regular review of interactions with LEP individuals; and the overall supervision of the LEP Program.



Factor 3

The importance to LEP persons of the Cooperative's Programs, Activities, and Services

Step One: Identify Services

Sawnee EMC recognizes that the critical nature of retail electrical service makes it more likely that language assistance may be needed to ensure access to all LEP individuals. This recognition is also consistent with evidence of contact between Sawnee EMC and LEP persons. As indicated above, the primary reasons an LEP individual contacts Sawnee EMC are to (1) reconnect service, or establish new service, or (2) to obtain account information or make a payment.

Sawnee EMC will continue to analyze its offered services in order to identify any additional areas of potential critical concern to LEP individuals.

Step Two: Input From Community Organizations and LEP Persons

Sawnee EMC encourages feedback from LEP persons regarding their experiences with the Cooperative, as well as any obstacles faced by such individuals in obtaining services or assistance. To this end (and as described above in Factor 2), the Cooperative has developed an LEP Program policy, Policy 421, which gives LEP persons the opportunity to bring any issues to the attention of the staff of the Cooperative. In addition, Sawnee EMC has designated an LEP Compliance Officer, whose responsibility is to ensure compliance with the objectives of the LEP Plan. This person will also be responsible for investigating and responding to any complaints regarding LEP access. The Policy and the Complaint Form are attached as Appendix 5.

Finally, as noted above, Sawnee EMC will periodically review the need for additional outreach to identify any barriers to effective communication with LEP individuals, if circumstances so require.

Factor 4

The Resources Available to the Cooperative and Associated Costs

Step One: Inventory

The steps currently being taken by Sawnee EMC have been outlined above. This includes providing telephonic translation services, as well as the employment of bilingual individuals in the Cooperative's Customer Service Department.

Additionally, Sawnee EMC has designated an LEP Compliance Officer to assist in ensuring equal access to services by all LEP persons.

With respect to documents, the Cooperative has determined that the following documents constitute vital documents for purposes of the LEP Program:

- 
- Application for Service
 - RUS Civil Rights Statement
 - LEP Complaint Form
 - Right of Way Easement Form
 - Policy 401, Member Access to Cooperative Information
 - Policy 420, Prepaid Metering Program & Prepaid Metering FAQ's

Sawnee EMC will provide translated versions of these vital documents in the six languages identified in Factor 1 of this Plan (e.g. Spanish, Korean, Chinese, Russian, and Hindi). Additional translations for qualifying "Other Asian" languages will be provided on a "case by case" basis. (See Appendix 6: Essential Documents)

Step Two: Determine Additional Services

Sawnee EMC will consider engaging in additional outreach to identify any barriers to effective communication with LEP individuals for essential services, if circumstances so require.

Step Three: Analyze the Budget

Sawnee EMC considers the voice translation services and document translation services to constitute normal and ongoing costs of business, and accordingly, such costs, at this time, are not viewed as burdensome to the operations of the Cooperative.

Step Four: Cost Effective Practices

Whenever it is in the overall best interest of the Cooperative, Sawnee EMC seeks to hire bilingual individuals in its Call Center to ensure access to all Sawnee EMC services and programs.

To this end, the Cooperative posts open positions in Spanish language publications, including Mundo Hispanico and Metro Jobs Atlanta (also known as Georgia Diversity) in order to attract employees who can better assist LEP individuals.

Sawnee EMC will continue to analyze the need for translation of critical documents, and will pay for such translations whenever circumstances so require.



Final Considerations and Ongoing Commitment to Access

Sawnee EMC remains committed to providing access to LEP individuals, and to identifying any barriers to effective communication. To this end, Sawnee EMC will take, or has already taken, the following actions:

- Post Language Self-Identification signs in critical locations (example is included as Appendix 7: Language Self-Identification). Additional signs will be made to employees who request them, or demonstrate a need for the signs;
- Adopt an LEP policy with a specified complaint mechanism to ensure effective communication with LEP persons;
- Designate an LEP Compliance Officer with specific responsibilities relating to the oversight and continuing success of the LEP Plan;
- Continue to utilize third party telephonic interpretation services;
- Continue to review documents to determine whether additional communications constitute vital documents requiring translation;
- Continue to post job openings in publications which will attract qualified bilingual applicants;
- Continue training CSRs in the use of the interpretation services, as well as the existence of the LEP Plan.
- Update the Customer Service manual with specific instructions related to LEP individuals;

- Engage in a review of the LEP Plan every two (2) years, or as circumstances require;
- Investigate and resolve any LEP-related complaints; and
- Update the Sawnee EMC website with LEP information.

As described above, Sawnee EMC is committed to ensuring effective communication with the LEP persons within its eligible service population.

It is the belief of the Cooperative that the efforts outlined in this LEP Plan will accomplish that critical goal, and that this LEP Plan satisfies the Cooperative's responsibility to ensure that LEP persons have access to the services and benefits provided by the Cooperative.





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APPENDIX 1

SAWNEE ELECTRIC MEMBERSHIP CORPORATION

LIMITED ENGLISH PROFICIENCY PLAN

RESOLUTION

WHEREAS, the management and staff (“Staff”) of Sawnee Electric Membership Corporation (“Corporation”) has determined that, as a borrower of loan funds from the U.S. Department of Agriculture (“USDA”), Rural Utility Service (“RUS”), certain ongoing regulatory compliance requirements exist; and

WHEREAS, in accordance with Title VI of the Civil Rights Act of 1964, 7 CFR 15, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” and related case law, define that recipients of Federal funds shall not discriminate on the basis of race, color, or national origin; and

WHEREAS, the USDA has developed a policy which prohibits discrimination, as referenced herein, and focuses on a borrowers’ obligation not to discriminate on the basis of “national origin”; and

WHEREAS, the Federal courts and the United States Department of Justice have determined that this obligation includes, among other factors, the providing of meaningful access to Federally funded programs to persons with Limited English Proficiency (LEP); and

WHEREAS, on November 28, 2014, USDA published guidelines in the Federal Register (79 FR 70771) to help borrowers, such as the Corporation, who participate in Federally assisted programs, including the RUS loan programs, to comply with their obligation to provide meaningful access to LEP individuals; and

WHEREAS, USDA has published a guidance which sets out the policies, procedures, and steps that USDA fund recipients, such as the Corporation, may take to ensure that LEP persons have meaningful access to Federally assisted programs and activities; and

WHEREAS, the USDA guidance recommends that a RUS borrower, such as the Corporation, adopt a Language Assistance Plan (LAP) which provides a strategy to address the results of a defined four-factor analysis so that persons with LEP have meaningful access to USDA funded programs; and

WHEREAS, the Corporation has followed the guidance provided by USDA, thereby demonstrating that, as a borrower, the Corporation is meeting its meaningful access obligations and effecting compliance with USDA’s requirements; and

WHEREAS, the Staff of the Corporation has developed certain activities and programs in support of the Corporation’s LEP efforts; and

WHEREAS, the Board, at its regular meeting held on November 17, 2016, reviewed and considered the Staff’s proposed Limited English Proficiency Plan (“Plan”) and supporting policy, Board Policy 421, Limited English Proficiency Program (“Policy”); and

SAWNEE ELECTRIC MEMBERSHIP CORPORATION

LIMITED ENGLISH PROFICIENCY PLAN

RESOLUTION

NOW THEREFORE, BE IT RESOLVED, that the Board does hereby approve the Corporation's Plan and the associated Policy and does accept it as the Corporation's official Plan in the furtherance of the LEP objectives and requirements, as stated therein; and

BE IT FURTHER RESOLVED, that the President and Chief Executive Officer is hereby authorized and empowered, by the Board, to implement any and all programs of the Corporation in support of the Corporation's efforts in the furtherance of the LEP objectives stated herein.

CERTIFICATION

I, Rodney H. Reese, Secretary of the Sawnee Electric Membership Corporation do hereby certify that the foregoing is a true and correct copy of excerpts from the minutes of a regular meeting of the Board of Directors of the Sawnee Electric Membership Corporation of Cumming, Georgia, held on the 17th day of November 2016, as appears in the minutes book of the Corporation.



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Rodney H. Reese
Secretary

(SEAL)

APPENDIX 2



SAWNEE®
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LANGUAGE LIST

VOIANCE SUPPORTS HUNDREDS OF LANGUAGES AND DIALECTS.

See below for a list of our more frequently requested languages. A full language list is available upon request from marketing@voiance.com.

Albanian	American Sign Language	Amharic (Ethiopia)	Arabic	Armenian	Armenian (Eastern)
Armenian (Western)	Bambara	Bengali	Bhutanese/Dzongkha	Bosnian	Brazil-Portuguese
Bulgarian	Burmese	Cambodian	Cantonese	Cebuano	Croatian
Dari (Afghanistan)	Egyptian Arabic	Ethiopian	Farsi	Filipino	French
French Canadian	French Creole	Fuzhou			
Georgian	Greek	Gujarati	Gulf Arabic	Haitian Creole	Hebrew
Hindi	Hmong	Iraqi Arabic	Italian	Japanese	Karen
Khmer	Kinya/Rwanda	Korean	Lao	Levantine Arabic	Maay Somali/Mai-Mai
Malayalam	Mandarin (Ch, "uc.)	Mongolian	Moroccan Arabic	Nepali	Oromo (Ethiopia)
Pashto (Afghanistan)	Persian				
Polish	Portuguese	Punjabi	Romanian	Russian	Serbian
Serbo-Croatian	Somali	Soninke	Spanish	Sudanese Arabic	Swahili
Sylheti	Tagalog	Tamil	Telugu	Thai	Tigrigna (Eritrea)
Turkish	Ukrainian	Urdu	Uzbek	Vietnamese	Wolof
Yemeni Arabic	Yugoslavian				



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APPENDIX 3



Sawnee EMC Limited English Proficiency Plan Web Page

Dated: 5/17/19

Limited English Proficiency (LEP)

Overview

Sawnee EMC is required under Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", to provide limited English-speaking individuals with additional resources. Listed at this site are the various resources offered to Limited English Proficiency (LEP) individuals by Sawnee EMC.

Limited English Proficiency Language Access Plan

A PDF version of Sawnee EMC's Limited English Proficiency Language Plan is included here. This Plan outlines the steps that have been taken by Sawnee to assist LEP individuals in accessing Sawnee EMC services and programs.

Limited English Proficiency Complaint Procedure

Listed in the "Quick Links" section of this site is a Complaint Procedure (See Policy 421, Limited English Proficiency Program and the associated complaint form) for those LEP individuals within Sawnee's service area. The complaint procedure form can be used to offer comments and to report any problems relating to access of Sawnee's essential services.

Translated Documents

In support of its LEP Language Access Plan, Sawnee EMC has provided translations of vital documents. These documents are listed in the "Quick Links" section to the right. Additional document(s) can be provided, upon request, via the LEP Program complaint procedure form described above.

What Language Do You Speak?

To aid LEP individuals seeking essential services from Sawnee EMC, and in an effort to facilitate effective communication with Sawnee EMC staff, we have provided a "Language Identification" form in the "Quick Links" section of this site.

Contact Us

Sawnee EMC's LEP Compliance Officer is its Vice President of Office Services, Mr. Ryan Satterfield. Any interested party may contact Sawnee's LEP Compliance Officer by email at ryan.satterfield@sawnee.com or by calling (770) 887-2363.

LEP QUICK LINKS

- [Language Identification Form \(PDF\)](#)
- [Limited English Proficiency Language Access Plan \(PDF\)](#)
- [Policy 421, Limited English Proficiency Program \(PDF\)](#)

Translated Documents

- [Application for Electric Service](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [USDA / RUS Civil Rights Notice](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [Complaint Procedure Form](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [Right of Way Easement \(General\)](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [Policy 401, Member Access to Cooperative Information](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [Policy 420, Prepaid Metering Program](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)
- [Prepaid Metering Program, FAQs](#)
 - [Spanish \(PDF\)](#)
 - [Korean \(PDF\)](#)
 - [Chinese \(PDF\)](#)
 - [Russian \(PDF\)](#)
 - [Hindi \(PDF\)](#)

APPENDIX 4



Sawnee EMC
 Limited English Proficiency Plan
 U.S. Census Data for SEMC Service Area

Dated: 10/24/16

<u>Languages</u>	Total of all Census Tracts	% of total population	
Total:	513,247		
Speak only English	413,697		
Languages With Greater Than 1,000 or 5%			
Spanish or Spanish Creole:	37,326		
Speak English "very well"	21,342		
Speak English less than "very well"	15,984	3.11%	
Korean:	8,290		
Speak English "very well"	3,872		
Speak English less than "very well"	4,418	0.86%	
Chinese	7,919		
Speak English "very well"	4,129		
Speak English less than "very well"	3,790	0.74%	
Other Asian languages:	8,852		
Speak English "very well"	7,230		
Speak English less than "very well"	1,622	0.32%	
Russian:	3,640		
Speak English "very well"	2,208		
Speak English less than "very well"	1,432	0.28%	
Hindi:	4,993		
Speak English "very well"	3,934		
Speak English less than "very well"	1,059	0.21%	
Other Languages Spoken			
French (incl. Patois, Cajun):	2,009		
Speak English "very well"	1,646		
Speak English less than "very well"	363	0.07%	
French Creole:	363		
Speak English "very well"	196		
Speak English less than "very well"	167	0.03%	
Italian:	458		
Speak English "very well"	328		
Speak English less than "very well"	130	0.03%	
Portuguese or Portuguese Creole:	1,911		
Speak English "very well"	1,414		
Speak English less than "very well"	497	0.10%	

	German:	2,531		
	Speak English "very well"	2,176		
	Speak English less than "very well"	355	0.07%	
	Yiddish:	0		
	Speak English "very well"	0		
	Speak English less than "very well"	0	0.00%	
	Other West Germanic languages:	714		
	Speak English "very well"	685		
	Speak English less than "very well"	29	0.01%	
	Scandinavian languages:	240		
	Speak English "very well"	215		
	Speak English less than "very well"	25	0.00%	
	Greek:	138		
	Speak English "very well"	138		
	Speak English less than "very well"	0	0.00%	
	Polish:	668		
	Speak English "very well"	506		
	Speak English less than "very well"	162	0.03%	
	Serbo-Croatian:	1,214		
	Speak English "very well"	736		
	Speak English less than "very well"	478	0.09%	
	Other Slavic languages:	857		
	Speak English "very well"	524		
	Speak English less than "very well"	333	0.06%	
	Armenian:	60		
	Speak English "very well"	20		
	Speak English less than "very well"	40	0.01%	
	Persian:	1,716		
	Speak English "very well"	1,016		
	Speak English less than "very well"	700	0.14%	
	Gujarati:	1,663		
	Speak English "very well"	1,322		
	Speak English less than "very well"	341	0.07%	
	Urdu:	1,181		
	Speak English "very well"	1,103		
	Speak English less than "very well"	78	0.02%	
	Other Indic languages:	2,865		
	Speak English "very well"	2,380		
	Speak English less than "very well"	485	0.09%	
	Other Indo-European languages:	1,030		
	Speak English "very well"	732		
	Speak English less than "very well"	298	0.06%	
	Japanese:	1,004		
	Speak English "very well"	503		
	Speak English less than "very well"	501	0.10%	

Mon-Khmer, Cambodian:	16		
Speak English "very well"	0		
Speak English less than "very well"	16	0.00%	
Hmong:	36		
Speak English "very well"	36		
Speak English less than "very well"	0	0.00%	
Thai:	504		
Speak English "very well"	491		
Speak English less than "very well"	13	0.00%	
Laotian:	83		
Speak English "very well"	42		
Speak English less than "very well"	41	0.01%	
Vietnamese:	1,730		
Speak English "very well"	744		
Speak English less than "very well"	986	0.19%	
Tagalog:	1,055		
Speak English "very well"	885		
Speak English less than "very well"	170	0.03%	
Other Pacific Island languages:	182		
Speak English "very well"	130		
Speak English less than "very well"	52	0.01%	
Navajo:	0		
Speak English "very well"	0		
Speak English less than "very well"	0		
Other Native North American languages:	36		
Speak English "very well"	26		
Speak English less than "very well"	10	0.00%	
Hungarian:	135		
Speak English "very well"	135		
Speak English less than "very well"	0		
Arabic:	2,065		
Speak English "very well"	1,277		
Speak English less than "very well"	788	0.15%	
Hebrew:	488		
Speak English "very well"	472		
Speak English less than "very well"	16	0.00%	
African languages:	1,337		
Speak English "very well"	1,262		
Speak English less than "very well"	75	0.01%	
Other and unspecified languages:	241		
Speak English "very well"	160		
Speak English less than "very well"	81	0.02%	



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APPENDIX 5

SAWNEE ELECTRIC MEMBERSHIP CORPORATION

POLICY NO. 421

SUBJECT: LIMITED ENGLISH PROFICIENCY PROGRAM

I. OBJECTIVE

- A. To ensure effective communication with Limited English Proficient (“LEP”) individuals within the eligible service population of Sawnee Electric Membership Corporation (“Cooperative”), and to ensure access by LEP individuals to essential services and benefits provided by the Cooperative.
- B. To define the process such that an LEP individual may file a formal complaint with the staff of the Cooperative.
- C. To provide the staff of the Cooperative with a systematic approach to receive, process, and respond to LEP complaints filed with the Cooperative by or on behalf of LEP individuals.
- D. To communicate and memorialize the standard of care required when addressing LEP complaints received by the Cooperative.

II. CONTENT

A. General

- 1. The staff of the Cooperative have proposed herein, and the Board of Directors (“Board”) have approved a formal process to receive, process, and respond to bona fide LEP complaints filed with the Cooperative.
- 2. The Vice President of Office Services (V.P.), or his/her designee, shall be considered the LEP Compliance Officer.

B. Program Overview

- 1. The Cooperative will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in its services, activities, programs, and other benefits.
- 2. It is the policy of the Cooperative is to ensure meaningful communication with LEP persons and their authorized representatives involving their service.
- 3. The LEP of the Cooperative provides for communication of information contained in vital documents, including but not limited to, waivers of rights, consent forms, financial forms, etc.
- 4. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and their families will be informed of the availability of such assistance free of charge.

5. Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services.
6. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP persons will be trained in effective communication techniques, including the effective use of an interpreter.

III. COMPLAINT PROCESS AND REQUIREMENTS

- A. Any individual who believes that the Cooperative has discriminated against them, or against a class or persons, in violation of the Cooperative's LEP Program, may file a complaint with the Cooperative within 180 days after the date of the alleged event. Failure to file a LEP complaint within 180 days of the alleged event may lead to dismissal of the complaint.
- B. Once a LEP complaint has been received by the staff of the Cooperative, such LEP complaint shall be forwarded to the LEP Compliance Officer, or his/her designee, to be processed as outlined herein.
- C. The LEP individual filing the complaint should, at a minimum, provide the following information for a complaint to be considered valid:
 1. The name, address, telephone number, and signature of person filing the LEP complaint;
 2. Facts and circumstances surrounding the LEP complaint, including the date of the allegation, and the legal basis of the LEP complaint (i.e., race, color, national origin, or LEP status);
 3. Any names and contact information of persons, if known, whom the LEP Compliance Officer could contact for additional information to support and/or clarify the allegations of the LEP complaint; and
 4. Corrective actions or remedies that the LEP complainant wishes to see provided.
- D. The Cooperative shall make a LEP Complaint form (attached as "Exhibit A") available upon request to individuals seeking to file a complaint based on the Cooperative's LEP program. This Complaint form outlines the specific information sought by the Cooperative in conducting any investigation into LEP complaints and shall be used by Cooperative employees in memorializing any verbal complaints based on the LEP Program. The Cooperative will provide translated versions of the LEP Complaint form, as required by law and census data, relative to the Cooperative's eligible service population.

- E. Failure to utilize the Cooperative's LEP Complaint form will not prevent a complaint from being processed; however, the failure to provide the information outlined above will result in the LEP complaint being considered invalid and returned to the complainant (if possible) for completion. The staff will not take any action until the minimum information, as provided herein, is provided by the complainant.
- F. In all cases, the LEP Compliance Officer, or his/her designee, shall respond to all valid and completed LEP Complaints received as outlined below:
 - 1. With an initial assessment within ten (10) business days of receipt of a valid LEP complaint.
 - 2. With the Cooperative's final assessment and proposed action, if any, within sixty (60) days of receipt of a valid LEP complaint.

IV. **REPORTING**

- A. A log of all LEP Complaints received by the Cooperative and provided to the LEP Compliance Officer shall be maintained by the LEP Compliance Officer, or his/her designee, to serve as documentation of the nature of and final resolution of an LEP complaint.
- B. No less than annually, the LEP Compliance Officer, or his/her designee, shall make a written report to the Office of the President and Chief Executive Officer (CEO) as to the effectiveness of the Cooperative's LEP program and the nature and resolution of all valid LEP complaints received since his/her last report.
- C. By approving this policy, the Board is also approving the Cooperative's supporting LEP Plan.
- D. The staff will review the Cooperative's LEP Plan no less than every three (3) years to determine if any additional action is needed or warranted and where such action is needed, the staff will advise the Board accordingly.

V. **MONITORING**

- A. On an ongoing basis, the Cooperative will assess changes in demographics, types of services, or other needs that may require reevaluation of its LEP policy and its procedures.
- B. In addition, the Cooperative will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from persons and others.

VI. RESPONSIBILITY

It shall be the responsibility of the President and Chief Executive Officer to administer this policy, to develop appropriate controls for its overall enforcement and to report his findings to the Board of Directors.

ADOPTED: 11/17/16
REVISED: 05/16/19
05/20/21

EFFECTIVE: 11/17/16
05/17/19
05/21/21



**SAWNEE ELECTRIC MEMBERSHIP CORP.
LIMITED ENGLISH PROFICIENCY (LEP) COMPLAINT FORM
(EXHIBIT "A")**

Contact Information:

Name _____

Address _____

City _____ State _____

Zip _____

Telephone: _____

Email: _____

(Internal Use)

Date Received: ____/____/____

Method Received: ____/____/____

Verbal Complaint? Y N

Name of Employee Completing
Form on Behalf of Complainant:

Complaint:

Facts and circumstances surrounding the complaint, including the date of the allegation, and the legal basis of the complaint (i.e., race, color, national origin, or LEP status):

Any names of persons, if known, whom the Cooperative could contact for additional information to support or clarify the allegations, and contact information for those persons:

Corrective action or remedy requested:

Sign the complaint in the space below. Attach any documents you believe support your complaint.

Complainant's Signature _____

Date _____

If the form is to be mailed, please send to the following address:

Sawnee EMC
LEP Compliance Officer
543 Atlanta Rd.
Cumming, GA 30040

APPENDIX 6



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Sawnee EMC
Limited English Proficiency Program
Vital Document Review for Translation – Proposed List of Items

Dated: 3/28/18

Overview: Listed below is the staff's preliminary assessment of essential documents that are under review for possible translation under the Corporation's Limited English Proficiency Program ("Program"). This list should be considered as "work in progress" and users of these documents should recognize that no formal action is to occur until such time as the staff completes its review of the documents needed to comply with this Program.

<u>Item No.</u>	<u>Name - Description</u>	<u>Status</u>
	<u>Vital Documents To Be Translated</u>	
1.)	Application for Service –	Complete
2.)	RUS Civil Rights Statement –	Complete
3.)	Complaint Form in the following languages	Complete
	a. Spanish	Complete
	b. Russian	Complete
	c. Hindi	Complete
	d. Chinese – Mandarin	Complete
	e. Korean	Complete
	f. Other Asian Languages (Note: The SEMC review team agreed to note this and not take action given that no specific language was identified in the U.S. Census database.)	Complete
4.)	Easement Form	Complete
5.)	Policy 401, Member Access to Cooperative Information	Complete
6.)	Policy 420, Prepaid Metering Program & Prepaid Metering FAQ's	Complete

APPENDIX 7



- | | | |
|--------------------------|---|------------------------|
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | 1. Arabic |
| <input type="checkbox"/> | Խնդրում ենք նշում կատարել այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | QUmbJÇak'kñ`g®/b'enH ebI/ñk/an ...niXaXPasa e†oµe . | 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 بزنید. | 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 διαβάσετε 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 megérti 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 căsuță 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 квадратић 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"/>	ให้กําเครื่องหมายลงในช่องนี้ถ้าท่านถ้่านหรือพูดภาษาไทย.	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 ghiñnh daáu vaøo oá naøy neáu quyù vò bieát ñhoïc vaø noùi ñhõõic Vieät Ngõõ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish