

Limited English Proficiency Plan

SENIOR CENTER RESOURCES AND PUBLIC TRANSIT

**TITLE VI Officer
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INTRODUCTION**

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This Limited English Proficiency Plan has been prepared to address the Senior Center Resources and Public Transit, Inc., (SCRPT) responsibilities as a recipient of the federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled **Improving Access to Services for Persons with Limited English Proficiency**, indicates that differing treatment based upon a person's inability to speak, read write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all SCRPT departments receiving federal grant funds.

Plan Summary

SCRPT has developed this **Limited English Proficiency Plan** to help identify reasonable steps for providing language assistance to person with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP person are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This Plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, SCRPT used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by SCRPT.
2. The frequency with which LEP persons come in contact with SCRPT services.
3. The nature and importance of services provided by SCRPT to the LEP population.
4. The interpretation services available to SCRPT and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require SCRPT services.

SCRPT worked in conjunction with the North Central Texas Council of Governments to evaluate the 2010 census data to determine that 3,612 persons, (4.26% of the total population) in Hunt County speak English "less than very well" In SCRPT service area, of those person with limited English proficiency, 3179 (3.75%) speak Spanish, 249 (.29%) speak Asian or other Pacific Islander Languages, and 184 (.22%) speak Indo-European

2. The frequency with which LEP persons come in contact with SCRPT services.

SCRPT staff reviewed the frequency with which the board/council, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, SCRPT has had no requests for interpreters and no request for translated program documents. The board/council, office staff and bus/van drivers have had very little contact with LEP persons.

3. The nature and importance of service provided by SCRPT to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for SCRPT. The overwhelming majority of the population 95.74% speak only English. As a result, there are few social, service, professional and leadership organizations within the SCRPT service area that focus on outreach to LEP individuals. SCRPT board, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board meetings.

4. The resources available to SCRPT, and overall costs to provide LEP assistance.

SCRPT reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, currently SCRPT has on staff an individual that reads, speaks, and writes Spanish so that communication will be expedient to the majority of the LEP population of Hunt County. SCRPT also will have access to an online written translator that will currently translate 19 different languages to English (<http://www.microsofttranslator.com/>)

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to SCRPT services. Language assistance can include interpretation, which means oral or spoken transfer of message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How SCRPT staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All SCRPT staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All SCRPT staff will be informally surveyed periodically on their experience concerning any contacts with LEP person during the previous year.

- When SCRPT sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage in SCRPT of LEP individuals, that is, persons who speak English "Less than very well", it will strive to offer the following measures:

1. SCRPT staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communication English
2. The following resources will be available to accommodate LEP persons:
 - Staff/volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.
 - Language interpretation will be accessed for all other languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public
- Use of the "I Speak" cards
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for SCRPT will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

SCRPT weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translation the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, SCRPT does not have a formal outreach procedure in place. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, SCRPT will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed and posted for public notice in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan – SCRPT will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2020 U. S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in SCRPT service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the SCRPT's financial resources are sufficient to fund language assistance resources needed.
- Determine whether SCRPT fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF SCRPT LEP PLAN

- Post signs at conspicuous and accessible location notifying LEP person of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at (903) 454-1444.