

# Limited English Proficiency Plan

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Great Lakes  
COMMUNITY ACTION  
P A R T N E R S H I P

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## I. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address Great Lakes Community Action Partnership's (GLCAP) responsibilities as a recipient of federal financing assistance as they relate to the needs of individuals with limited English 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 subject 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 GLCAP.

## II. PLAN SUMMARY

GLCAP has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to accept services provided. As defined in Executive Order 13166, LEP persons 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 which assistance may be provided, staff training and how to notify LEP persons that assistance is available.

In order to prepare this plan, GLCAP 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 at GLCAP.
2. The frequency with which LEP persons come in contact with GLCAP services.
3. The nature and importance of services provided by GLCAP to the LEP population.
4. The interpretation services available to GLCAP and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in Section III.

## III. FOUR-FACTOR ANALYSIS

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

GLCAP staff reviewed data on limited English speaking proficiency from the 2018 American Community Survey five-year estimates. This data indicates that 12,264 persons in the GLCAP's four-county service area (Wood, Sandusky, Ottawa and Seneca counties) speak a language other than English. This represents 4.53% of the area population. Of those 12,264 persons, 3,790 persons speak English "less than very well." This represents 1.40% of the total four-county population. 1,592 of those with limited English speaking skills speak Spanish. Other significant language groups from the four-county population include 690 who speak Indo-European languages, 817 who speak Asian and Pacific Islander languages and 691 who speak other languages.

### 2. **The frequency with which LEP persons come in contact with GLCAP.**

GLCAP staff reviewed the frequency with which staff have, or might have, contact with LEP persons. This includes documented phone inquiries or office visits. This review concluded that GLCAP receives several requests monthly for interpreting and translating program documents, generally in Spanish.

### **3. The nature and importance of services provided by GLCAP to the LEP population.**

Services provided by GLCAP that are most likely to encounter LEP individuals vary from emergency heating/cooling assistance to Head Start. Access to GLCAP services is especially critical for those who are in emergency situations. It is also possible that GLCAP will encounter LEP individuals that have been referred from or require referrals to other local human service organizations.

### **4. The resources available to GLCAP, and cost to provide LEP assistance.**

GLCAP assessed its available resources that could be used for providing LEP assistance, including determining staff who could serve as Spanish interpreters/translators (given the concentration of Spanish-speaking individuals). In addition, staff determined which of its documents would be the most valuable to be translated and what external services were available for additional languages.

Based on the four-factor analysis, GLCAP developed its LEP Plan as outlined in Section IV.

## **IV. PLAN IMPLEMENTATION**

### **A. Identifying LEP Individuals Who Need 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 GLCAP services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language

GLCAP staff will identify a LEP person via the following methods:

- Receptionist and front-line staff greet clients as they initially encounter them. By informally engaging the clients in conversation, it is possible to gauge the client's ability to speak and understand English.
- Post a notice of the LEP Plan and the availability of interpretation or translation services in languages LEP persons would understand.
- Receipt of a client referral from another human service organization indicating that she/he is a LEP person.
- Staff will utilize language identification cards as they encounter a LEP person. Developed by the US Census Bureau, these cards have been translated into 38 different languages. They have been made available to staff and can also be accessed at [www.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf).

### **B. Language Assistance Measures**

GLCAP has language assistance measures available to LEP persons, including both oral and written. There are also various ways in which GLCAP staff are able to respond to LEP persons, whether in person, by telephone or in writing.

- GLCAP has staff who can interpret and translate Spanish.
- Program applications are available in Spanish.
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will access language assistance services from a professional translation service. The providers are LanguageLine Solutions Interpreting Services and can be contacted at 888-808-9008 and Language Services Associates and can be contacted at 1- 866-937-7325. (Staff should reference the training memo provided for specific account information.)
- Network with local human service organizations that provide services to LEP persons and seek opportunities to provide information on GLCAP programs and services.

### **C. Staff Training**

The following training will be provided to GLCAP staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered.
- Use of the “I Speak” cards.
- Language assistance services account information.
- Documentation of language assistance requests.

### **D. Translation of Vital Documents**

When staff prepare a document for which the target audience is expected to include LEP individuals, the documents will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

### **E. Providing Notice to LEP Persons**

The following methods will be used to disseminate GLCAP’s LEP Plan:

- Post signs at GLCAP locations notifying LEP persons of the LEP Plan and how to access language services.
- A link to the GLCAP LEP Plan is included on the GLCAP website at [www.glcap.org](http://www.glcap.org). Any person or agency can access and download the plan.
- Any person or agency may request a copy of the plan via telephone, electronic mail, fax, postal mail or in person at no cost. LEP persons may request copies of the plan translated accordingly.

### **F. Monitoring and Updating the LEP Plan**

GLCAP will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the most recent US Census is available, or when it is clear that higher concentrations of LEP individuals are present in the GLCAP service area. Updates will include the following:

- Determination of the current LEP population in our service area.
- An approximate number of documented LEP person contacts encountered annually.
- Changes in better identifying LEP persons.
- Changes in language assistance measures to better assist LEP persons.