Limited English Proficiency Plan

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Great Lakes
COMMUNITY ACTION
PARTNERSHIP

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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 financial 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 provide that no person shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Under Title VI, denying a person meaningful access to programs and services because of limited English proficiency may be a form of national origin discrimination. Executive Order 13166, which previously directed federal agencies to issue language access guidance to recipients, was revoked by Executive Order 14224 in March 2025, and related federal guidance has been rescinded. GLCAP's obligations under Title VI and the civil rights regulations of its funding agencies remain in effect. This plan describes the reasonable steps GLCAP takes to meet those obligations.

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. For purposes of this plan, 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 recent American Community Survey five-year estimates and 2026 regional data sets. This data indicates that an estimated 12,760 persons in the GLCAP's four-county service area (Wood, Sandusky, Ottawa, and Seneca counties) speak a language other than English. This represents approximately 4.65% of the area's population aged five years and over. Of those individuals, an estimated 3,430 persons speak English "less than very well," representing 1.25% of the total four-county population over five. Approximately 1,995 of those with limited English-speaking skills speak Spanish. Other significant groups from the four-county population include an estimated 745 who speak Indo-European languages, 670 who speak Asian and Pacific Islander languages, and 115 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.

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 provider is 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. Any person or agency can access and download the plan.
- Any person or agency may request a copy of the plan via telephone, email, fax, USPS 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.