

INTRODUCTION

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. The purpose of this Limited English Proficiency Plan is to outline the responsibilities of LaGrange County Council on Aging & LaGrange County Area Transit System in regards to Limited English Proficient (LEP) persons and establish a process for providing assistance to LEP persons for LCAT programs, activities, and services pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

Title VI of the Civil Rights Act of 1964

"No person in the United States shall, on the ground 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."

Executive Order 13166

Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 *"Improving Access to Services for Persons With Limited English Proficiency,"* directs each Federal agency that is subject to the requirements of Title VI of the Civil Rights Act of 1964 to publish guidance for its respective recipients and sub-recipients clarifying that obligation. The U.S. Department of Transportation (USDOT) published policy guidance on December 14, 2005 to clarify the responsibilities of recipients of Federal financial assistance from the USDOT.

Plan Summary

LaGrange County Council on Aging staff has developed this Limited English Proficiency Plan (LEP) to provide language assistance for LEP persons seeking meaningful access to LaGrange County Council on Aging programs as required by Executive Order 13166 and USDOT's policy guidance. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, and guidelines to notify LEP persons that assistance is available. In developing the LaGrange County Council on Aging LEP Plan, the LaGrange County Council on Aging staff undertook a USDOT Four-Factor LEP analysis, which considers the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by LaGrange County Council on Aging programs, activities, or services.
2. The frequency with which LEP individuals come in contact with LaGrange County Council on Aging programs, activities, or services;
3. The nature and importance of the program, activity or services provided by the LaGrange County Council on Aging to the LEP population; and
4. The resources available to the LaGrange County Council on Aging and overall cost to provide LEP assistance.

FOUR FACTOR ANALYSIS

FACTOR 1: Number or proportion of LEP persons eligible to be served or likely to encounter LaGrange County Council on Aging programs, activities, or services.

In order to determine the number of LEP persons, the LaGrange County Council on Aging collected various data from the US Census Bureau. This data was used to evaluate whether certain language groups met the Safe Harbor clause of the LEP guidance, whether a language LEP group exceeds 5% of the County's population, or have a minimum threshold of 1000 LEP persons in a certain language. Using the Demographic Profile Date of Census 2010, the LEP population was ascertained. Based on the population, 3.6% or 1,346 of the LaGrange County population is deemed an LEP person of Hispanic descent. The remaining LEP population that did not speak English well or Spanish, were within general language categories such as Indo-European and Asian & Pacific Islander languages. This categorization does not prove helpful in targeting specific language assistance to our LEP populations.

FACTOR 2: Frequency with which LEP individuals come in contact with LaGrange County Council on Aging programs, activities, or services.

The LaGrange County Council on Aging assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying public meeting attendees.

No previous LEP requests have been received thus far. Documentation of LEP requests will be done annually upon implementation of the LEP plan.

FACTOR 3: Nature and importance of the program, activity or service provided by the LaGrange County Council on Aging to the LEP population.

To assess the nature and importance of the programs, activities, and services provided by LaGrange County Council on Aging to LEP and general community, the LaGrange County Council on Aging conducted an internal and external review:

Internal Review

Internally, LaGrange County Council on Aging staff evaluated programs and services based on the LaGrange County Council on Aging's function as one entity responsible for transportation planning in LaGrange County, the potential public interest, and the impact upon the quality of life of the public by LaGrange County Council on Aging functions. Per evaluation of LaGrange County Council on Aging programs, documents, and services, it was determined the following documents could be seen as vital documents:

- Coordinated Public Transit-Human Services Transportation Plan
- State of Indiana Human Services Coordination Plan
- Public Participation Plan

Based on this evaluation and the language assessment in Factor 1 of the Four Factor analysis, the staff will seek partner organizations proficient in Spanish to provide information about LaGrange County Council on Aging plans and programs. Translation and/or interpretation services, for Spanish and other languages, will be considered upon request and in coordination with partner agencies in the county. If any notice or document bears a direct impact toward a localized population that meets or exceeds the LEP Safe Harbor clause, then the notice or document will be considered for translation to include translating notices and key information contained within vital documents.

External Review

Externally, a public outreach effort within the identified language communities will be conducted. Community groups that work with the Spanish population will be outreached for their input. In this outreach, the LaGrange County Council on Aging staff will provide community groups a synopsis of what the primary purpose and functions of the Lagrange County Council on Aging System and ask what are key issues, programs, services, and activities they perceive are critical. These will be noted in the transportation planning process and sent forward to the agency and/or locality as applicable.

FACTOR 4: Resources available to the LaGrange County Council on Aging and overall costs to provide LEP assistance.

The LaGrange County Council on Aging assessment for available resources is an ongoing activity. Initially, volunteer staff of translators and interpreters will be identified.

HOW TO IDENTIFY AN LEP PERSON WHO NEEDS LANGUAGE ASSISTANCE

- Examine records of requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- Set up a sign-in sheet table at LaGrange County Council on Aging sponsored and attended events, have a staff member greet and briefly speak to attendees to informally gauge the attendee's ability to speak and understand English;
- Have the Census Bureau's "*I Speak Cards*" at workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings;

LANGUAGE ASSISTANCE MEASURES

The following LaGrange County Council on Aging documents will be available in Spanish:

- LaGrange County Council on Aging and LCAT brochures.
- Nondiscrimination Complaint Form.
- Additional translation and/or interpretation services will be considered upon request and in coordination with partner agencies in the county.

STAFF TRAINING

All LaGrange County Council on Aging staff will be provided access to the LEP Plan and will be offered training on procedures and services available. Training topics will include:

- Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.
- LEP program responsibilities and obligations.
- Language assistance services offered.
- Use of LEP Language Assistance Cards ("*I Speak Cards*").
- Documentation of language assistance requests.

PROVIDING NOTICE OF AVAILABLE LANGUAGE SERVICE TO LEP PERSONS

Signs should be posted that language assistance is available in public areas such as at LaGrange County Council on Aging reception area, conference room, waiting areas, and the LaGrange County Council on Aging website.

Outreach Techniques

- If the LaGrange County Council on Aging staff knows that they will be presenting a topic in a geographic location with a known concentration of LEP persons, LaGrange County Council on Aging staff will make a concerted effort to have meeting notices, fliers, advertisements, or agendas printed in the alternative language.

As well, LaGrange County Council on Aging staff will coordinate with local community groups to have someone available who can help interpret information at the meeting.

- When running a general public meeting notice in a geographic location that could be of potential importance to LEP persons or if staff will be hosting a meeting or a workshop, LaGrange County Council on Aging staff will, to the extent possible, insert the following clause: "An interpreter will be available" in the predominant language. LaGrange County Council on Aging staff will seek to coordinate with local community groups to have someone available who can help interpret information at the meeting.
- Coordination with local community groups is a key outreach component as LaGrange County Council on Aging staff identifies and seeks to engage LEP person in LaGrange County Council on Aging programs and activities.

MONITORING AND UPDATING THE LEP PLAN

The LaGrange County Council on Aging will follow the Title VI Program monitoring and reporting schedule for the LEP Plan. Reports will address the following questions:

- How many LEP persons were encountered?
- What is the current LEP population in LaGrange County?
- Has there been a change in the languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified LaGrange County Council on Aging programs? Are there other programs that should be included?
- Have LaGrange County Council on Aging resources available, such as technology, staff, and financial costs changed?

DISSEMINATION OF THE LAGRANGE COUNTY COUNCIL ON AGING LIMITED ENGLISH PROFICIENCY PLAN

LaGrange County Council on Aging staff will post the LEP Plan on its website at <http://www.lagrangecoa.org>. Any person with Internet access will be able to view the plan. Copies of the LEP Plan will also be provided to the LaGrange County Council on Aging member jurisdictions and interested parties upon request.