



# Limited English Proficiency Plan

**February 1<sup>st</sup>, 2012**

## **Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of New Hope Center, Inc. (NHC) as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13<sup>th</sup>, 2007, 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 federal 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.

## **Plan Summary**

New Hope Center is a multifaceted nonprofit organization which serves Calumet County by providing intensive day, vocational and prevocational, residential and transportation services to disabled individuals. This LEP Plan has been developed to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by NHC. 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 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, NHC undertook the US Department of Transportation (US DOT) 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 or are likely to encounter a NHC program, activity or service.
2. The frequency in which LEP persons come in contact with NHC programs, activities or services.
3. The nature and importance of programs, activities or services provided by NHC to the LEP population.
4. The resources available to NHC and overall cost to provide LEP assistance.

A summary of the results of the NHC four factor analysis is in the following section.



## **Four-Factor Analysis**

**1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a NHC program, activity or service.**

NHC staff reviewed the U.S. Census 2008-2010 American Community Survey 3-Year Estimates and determined that 2,338 individuals, or 5.1% of the population of Calumet County speak English less than "very well". 3.1% speak Spanish, It is reported that 1.0% speak Indo-European languages, and 1.5% speak Asian/Pacific Islander languages as the primary language spoken at home. Additionally, 3,530 individuals, or 7.3% of the population, are estimated to have disabilities. Statistics do not show how many disabled individuals are reported to have language barriers. At present, the group of individuals we serve and their guardians speak English as their primary language at home. The proportion of LEP persons that would encounter our services is negligible.

**2. The frequency in which LEP persons come in contact with NHC programs, activities or services.**

NHC staff assessed the frequency in which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. To date, the most frequent contact between LEP persons is with caregivers, care managers and drivers. The majority of LEP individuals we service are nonverbal or cognitively impaired. For those individuals, we are in constant contact with their guardians and caregivers. We employ a variety of methods of communication, including utilizing sign language, gestures, modified speech, etc.

**3. The nature and importance of programs, activities or services provided by NHC to the LEP population.**

The concentration of LEP individuals is relatively small in our area, as 94.4% of our population speaks primarily English. The LEP group that are verbal speakers make up 5.1% of the population, and only a fraction, if any, are in need of the services our organization provides. We service a number of nonverbal individuals, and NHC makes practice of keeping in constant contact with clients' guardians to ensure we carry out their expressed wishes. We have translated documents available in the event they are needed.

**4. The resources available to NHC and overall cost to provide LEP assistance.**

NHC assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that NHC could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four factor-analysis, NHC developed its LEP Plan as outlined in the following section.



## **Limited English Proficiency (LEP) Plan Outline**

### **How NHC and staff may identify a LEP person who needs language assistance;**

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to New Hope Center or NHC sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Post translated documents in the language(s) of the most-spoken foreign languages of the area at NHC headquarters to encourage speakers to self-report a need for assistance.
4. Vehicle operators and other front-line staff, like dispatchers, Paratransit/demand response reservationists and receptionists, will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

### **Language Assistance Measures**

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

- Network with local human services organizations that provide services to LEP individuals and seek opportunities to provide information on NHC programs and services;
- Make provisions for bilingual interpreter for community events and public hearings;
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Post the NHC Title VI policy, complaint procedure and LEP options on our organization's website, [www.newhopeinc.org](http://www.newhopeinc.org);
- Include language, for example "Spanish a plus", in bus driver, caregiver and receptionist job advertisements;
- When an interpreter is needed in person or on the telephone, staff will provide access a qualified interpreter.

### **Staff Training**

The following training will be provided to NHC staff:

1. Information on the NHC Title VI Procedures and LEP responsibilities
2. Description of the language assistance services offered to the public
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint



### **Outreach Techniques**

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 in an alternative language based on the known LEP population. Interpreters will be made available as needed.

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

NHC will update the LEP at a minimum of once a year. The plan will be reviewed and updated when new data from the Census Bureau is made available, or when it is clear that higher concentrations of LEP individuals are present in the NHC 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 NHC's financial resources are sufficient to fund language assistance resources needed;
- Determine whether NHC has fully complied with the goals of this LEP plan;
- Determine whether complaints have been received concerning NHC's failure to meet the needs of LEP individuals

### **Dissemination of the NHC LEP Plan**

A link to the Title VI procedures and LEP access plan will be included on the New Hope Center website. Our website is currently being recreated and it will be available at [www.newhopeinc.org](http://www.newhopeinc.org) by March 2012.

Any person or agency with internet access will be able to access and download the plan from the NHC website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which NHC will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to New Hope Center's LEP Coordinator:

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