

CITY of
DICKINSON

2017

LIMITED ENGLISH PROFICIENCY PLAN

TITLE VI PROGRAM COORDINATOR
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INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the City of Dickinson's responsibilities as a recipient of 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 City of Dickinson departments receiving federal grand funds.

Plan Summary

City of Dickinson 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 access services provided. As defined 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, City of Dickinson 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 City of Dickinson/Stark County.
2. The frequency with which LEP persons come in contact with City services.
3. The nature and importance of services provided by the City to the LEP population.
4. The interpretation services available to the City 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

The number or proportion of LEP persons in the service area who may be served or are likely to require City/Stark County services.

Through the report from County Staff they reviewed the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates for Stark County and determined that 1,629 persons, in Stark County [6.5% of the population five or more years of age] speak a language other than English. Of those, 680 persons have limited English proficiency; that is; they speak English less than "very well" or "not at all." This is only 2.7% of the overall population in Stark County based on 2015 population estimates.

In Stark County, of those persons with limited English proficiency, 0.95% speaks Spanish, 0.61% speaks Inda-European languages. 1.12% speaks Asian and Pacific Island languages, and 0.01% speaks all other languages.

The frequency with which LEP persons come in contact with City/Stark County services.

Staff reviewed the frequency with which the City staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, City has had a few requests for an interpreter of services offered at the Stark County Social Services Office and no requests for translated program documents. The other departments have had very little contact with LEP persons.

The nature and importance of services provided by City of Dickinson to the LEP population.

There is no large geographic concentration of any type of LEP individuals in Stark County. The overwhelming majority of the population, 93.5%, speaks only English. As a result, there are only a few social, service, or professional and leadership organizations within Stark County that focus on outreach to LEP individuals. The City staff is most likely to encounter LEP individuals through vote centers, office visits, phone conversations, meetings, and law enforcement activities.

The resources available to City of Dickinson and overall cost to provide LEP assistance.

The City 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, and identified two City employees that speaks fluent Spanish, if translation is needed within a reasonable time period. Other language translation, if needed, would be provided through a telephone interpreter line for which the City would pay a fee.

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 City services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language.

How City 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 City staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All City staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the City sponsors an informational meeting or event, 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.

Language Assistance Measures

Although there is a very low percentage of a LEP individual in Stark County, that is, persons who speak English less than "very well" or "not at all", we will strive to offer the following measures:

- City staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- The following resources will be available to accommodate LEP persons:
 - City employee 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.

TRANSLATION OF DOCUMENTS

Due to the very small local LEP population, the City does not have a formal outreach procedure in place, as of 2016. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the City 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 include a notice to request that information be printed in an alternative language.
- The City will assess requests for translation of documents based on the possible impacts of the LEP population.

MONITORING

Monitoring and Updating the LEP Plan — City of Dickinson will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City/Stark County. 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 City's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City 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.

DISSEMINATION OF THE CITY OF DICKINSON LEP PLAN

- Post signs at City of Dickinson office buildings notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that a LEP person would understand that documents are available in that language upon request at City building locations.
- Post on the City website the LEP Plan and how to access language services.