

# **Limited English Proficiency Plan**

## **Connected Living**

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### **TITLE VI COORDINATOR**

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# INTRODUCTION

This **Limited English Proficiency Plan** has been prepared to address **Connected Living** 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 that receive federal funds, including all **Connected Living's** departments receiving federal grant funds.

## PLAN SUMMARY

Golden Umbrella 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 where assistance is available.

In order to prepare this plan, **Connected Living** 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 **Connected Living**.
2. The frequency with which LEP persons come in contact with **Connected Living** services.
3. The nature and importance of services provided by the **Connected Living** to the LEP population.
4. The interpretation services available to **Connected Living** 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

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

**Connected Living** staff reviewed the 2010 U.S. Census Report and determined that of the 331,447 persons in the five counties that Golden Umbrella serves; Shasta 14,676 (8.2%), Tehama 12,107 (19.2%), Trinity 901 (6.7%), Siskiyou 4,511 (10.3%) and Lassen 5,628 (17.5%) 37,823 people speak a language other than English. In Shasta County, of those persons with limited English proficiency, 1,801 speak Spanish, 1,760 speak Asian languages of which 1,185 speak Miao-Yao and 575 speak Laotian, and 395 speak other Indo-European languages.

2. **The frequency with which LEP persons come in contact with Golden Umbrella services.**

The **Connected Living** staff reviewed the frequency with which the office staff have or could have had contact with LEP persons. This includes documenting phone inquiries or office visits LEP passengers to poll for a period of 1 month. To date, **Connected Living** has had no requests for interpreters and no requests for translated program documents. **Connected Living** staff has had very little contact with LEP persons.

3. **The nature and importance of services provided by Connected Living to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the service area for **Connected Living**. The overwhelming majority of the population speaks only English. As a result, there is little social, service, professional and leadership organizations within **Connected Living's** service area that focus on outreach to LEP individuals. **Connected Living's** office staff and drivers are most likely to encounter LEP individuals through phone conversations or email.

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

**Connected Living** 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 contacted local citizens that would be willing to provide Spanish translation, if needed, within a reasonable time period. Other language translation, if needed, would be provided by Shasta County Opportunity Center or Mercy Medical Center.

## SAFE HARBOR PROVISION AND TRANSLATION OF DOCUMENTS

Factor 1 analysis revealed that Spanish and Mien languages exceed the Safe Harbor Threshold. Vital documents for **Connected Living** include the Title VI Notice, Title VI Complaint Procedure and Form, and the **Connected Living** Intake form. **Connected Living** has translated the Title VI Notices, Title VI Complaint Procedure and Form into Spanish.

## 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 **Connected Living's** Language assistance. This assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, and means the written transfer of a message from one language into another language.

How **Connected Living's** staff may identify an LEP person who needs language assistance:

- All **Connected Living's** staff would be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All **Connected Living's** staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

## LANGUAGE ASSISTANCE MEASURES

Although there is a very low percentage in **Connected Living** of LEP individuals, that is, persons who speak English "not well" or "not at all," it will strive to offer the following measures:

1. **Connected Living** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Paid interpreters for 240+ languages through a telephone interpretation service, including Spanish, are available and will be provided within a reasonable time period.
  - **Connected Living's** website content pertaining to senior services will be translated into the LEP language that meet the four factor criteria for **Connected Living** service area: Spanish.
  - **Connected Living** telephone system prompts will be translated into both English and Spanish.
  - Spanish language assistance cards will be provided to individuals identified as LEP Spanish speaking clients.

## **MONITORING**

**Monitoring and Updating the LEP Plan- Connected Living** will update the LEP Plan every three years. 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 **Connected Living** financial resources are sufficient to fund language assistance resources needed.
- Determine whether **Connected Living** 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.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

## **STAFF TRAINING**

**The following training is provided to all staff:**

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered.
- Use of the "I Speak" Cards.
- Documentation of language assistance requests.
- How to handle the potential Title VI/LEP complaint.
- Use of professional interpreter services from Shasta County Opportunity Center or Mercy Medical Center (over the phone interpretation provider).

## **AVAILABILITY OF THE CONNECTED LIVING LEP PLAN**

State on public notices in the language that LEP person would understand that documents are available in the language upon request at [www.goldenumbrella.org](http://www.goldenumbrella.org)

## **MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS:**

At this time Connected Living does not have any non-elected planning board.

## **EQUITY ANALYSIS:**

At this time Connected Living does not use FTA funds for the construction or transit related facilities.