

G. Language Assistance Plan (LEP Plan)

Southwest Center for Independent Living's(SCIL) Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address SCIL's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to 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 discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

The Southwest Center for Independent Living (SCIL) offers choices and empowerment for individuals with disabilities in the Missouri counties of Christian, Dallas, Greene, Lawrence, Polk, Stone, Taney and Webster.

SCIL has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by SCIL. 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, and the ways in which assistance may be provided.

In order to prepare this plan, SCIL undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

According to the OTO LEP Plan, additional languages for OTO to be aware of, as certain populations grow, include German, French (including Patois and Cajun), Chinese, and Russian.

After English and Spanish, these are among the top languages that are spoken at home for the population 5 years and over, regardless of the ability to speak English.

The OTO developed a survey with questions for agencies that provided services to Local LEP persons and to determine what services are most critical to the local LEP population. The OTO mailed 40 invitation letters to local educational organizations, public agencies, and churches asking for each group to participate in the 16 question LEP survey. Surveys were collected from February 15 through March 8, 2013. The survey responses included two organizations requesting removal from future mailings, and seven completed surveys. Two organizational addresses were no longer valid and are indicated in Appendix B.

Survey respondents stated that they work with LEP persons that speak languages that include Chinese, French, Korean, Japanese, Portuguese, Romanian, Russian, Spanish, Thai, and most other languages. There was a wide range in the ability to speak English from beginner to proficient. The 2010 census data for the OTO area indicates an increased population growth in most groups. The presence of individuals 5+ year of age, speaking English less than very well in Springfield area has grown to 3,094 and the OTO area to 4,493 per Table 1 data. The two languages with the largest increase have been Chinese and German as shown in Appendix A, but still under the Safe Harbor threshold.

A significant majority of people in the SCIL service area are proficient in the English language. Based on 2010 Census data, 1.8% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

LEP Population in SCIL Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Christian County within OTO Study Area	Greene County within OTO Study Area	Lawrence County	Dallas County	Polk County
Population 5 Years and Over	67,594	256,180	35,942	15,716	29,077
Speak English “less than very well”	615	3,878	1,086	493	435
Spanish					
Speak English “less than very well”	488	1,797	172	79	97
Other Indo-European					
Speak English “less than very well”	86	581	914	414	227
Percentages					
Percentage of Non-English Indo-European	.13%	.23%	.48%	2.6%	.78%
Percentage of	.72%	.70%	2.5%	.50%	.33%

Spanish speaking persons					
Percentage of All persons 5+ years of age who speak English less than "Very Well"	.91%	1.51%	3.0%	3.1%	1.4%
Population 5 years and over by language spoken at home and ability to speak English	Webster County	Stone County	Taney County		
Population 5 Years and Over	33,578	30,563	48,544		
Speak English "less than very well"	1,207	107	1,529		
Spanish					
Speak English "less than very well"	142	102	760		
Other Indo-European					
Speak English "less than very well"	1,065	5	753		
Percentages					
Percentage of Non-English Indo-European	3.1%	.02%	1.6%		
Percentage of Spanish speaking persons	.42%	.33%	1.6%		
Percentage of All persons 5+ years of age who speak English less than "Very Well"	3.6%	.35%	3.1%		

2. Frequency of Contact by LEP Persons with SCIL's Services:

The SCIL staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, SCIL has, on average, no requests per month for an interpreter regarding transportation.

LEP Staff Survey Form

SCIL is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?
 DAILY WEEKLY MONTHLY LESS THAN MONTHLY
2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by SCIL to LEP persons:

Outreach activities, summarized in SCIL's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to SCIL and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.



5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) SCIL has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

SCIL will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to SCIL staff:

1. Information on SCIL’s Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of SCIL’s Title VI Plan requirement.

SCIL will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the SCIL service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether SCIL's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether SCIL has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning SCIL’s failure to meet the needs of LEP individual.