

Chariton Valley Transportation Planning Affiliation

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Chariton Valley Transportation Planning Affiliation – RPA17

Limited English Proficiency Plan

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Prepared By:

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I. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the CVTPA - RPA17 Region responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English 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 based on 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.

Plan Summary

The CVTPA - RPA17 Region 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.

To prepare this plan, the system 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 the CVTPA - RPA17 Region
2. The frequency with which LEP persons meet the CVTPA - RPA17 Region services.
3. The nature and importance of services provided by the CVTPA - RPA17 Region to the LEP population.
4. The interpretation services available to the CVTPA - RPA17 Region and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

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II. FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require CVTPA - RPA17 Region services.

<i>COUNTY</i>	<i>Speak English Only at home 2019</i>	<i>+/- from 2013</i>	<i>Spanish Speaking at home 2019</i>	<i>+/- from 2013</i>	<i>Indo-European at home 2019</i>	<i>+/- from 2013</i>
Appanoose	97.1%	-0.6%	0.3%	-0.3%	1.6%	+0.6%
Clarke	87.8%	-3.4%	11.1%	+3.1%	1.0%	+5.5%
Davis	80.1%	-5.5%	0.4%	-.9%	19.3%	+6.5%
Decatur	94.1%	0%	1.5%	+0.2%	4%	-0.2%
Lucas	94.8%	+5.0%	1.7%	+1.0%	3.5%	-6.0%
Monroe	97.3%	+2.4%	.1%	-2.2%	2.6%	0%
Wayne	89.5%	-8.1%	1.0%	-.2%	8.6%	+6.9%
State of Iowa	91.7%	-1.1%	4.2%	+0.2%	1.7%	+0.1%
2019 & 2013 U.S. Census ACS						

The CVTPA - RPA17 Region staff reviewed the frequency with which Board and office staff have, or could have, contact with LEP persons. To date, the [CVTPA - RPA17 Region] has had no requests for interpreters and no requests for translated program documents. The Board and office staff have had very little contact with LEP persons.

2. The nature and importance of services provided by the CVTPA - RPA17 Region to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the CVTPA - RPA17 Region of most of the state’s population 91.7 % speak only English. As a result, there are few social, service, professional and leadership organizations within the CVTPA - RPA17 Region service area that focus on outreach to LEP individuals. The CVTPA - RPA17 Region and staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from public works staff of impacts on services and attendance at Board meetings.

3. The resources available to the CVTPA - RPA17 Region and overall costs to provide LEP assistance.

CVTPA - RPA17 Region 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 voluntary Spanish translation if needed within a reasonable time. Other language translation if needed would be provided through a telephone/internet interpreter for which the CVTPA - RPA17 Region would pay a fee.

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III. 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 the CVTPA - RPA17 Region services.

Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

Identifying 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 at initial points of contact. The CVTPA - RPA17 Region will display HUD's language Identification ("I SPEAK") cards in the System/ City Hall lobby.
- (Board/City Council) and Office staff will also 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 and frequency concerning any contacts with LEP persons during the previous year.
- Translation may not be able to be provided at every event but can easily be identified for the need for future events.

Language Assistance Measures-Although there is a very low percentage in the CVTPA - RPA17 Region of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. The CVTPA - RPA17 Region 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:
 - i. Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time.
 - ii. Language interpretation will be accessed for all other languages through a telephone interpretation service/internet.

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IV. STAFF TRAINING

The following training will be provided to all staff: (when needed or requested)

- Information on the Title VI Policy and LEP responsibilities; annually (if needed) and upon hire.
- Description of language assistance services offered to the public; in person and telephone.
- Use of the "ISpeak" cards. (when available)
- Documentation of language assistance requests.

V. TRANSLATION OF DOCUMENTS

- The CVTPA - RPA17 Region evaluated the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.
- Due to the very small local LEP population, the CVTPA - RPA17 Region does not have a formal outreach procedure in place. However, when and if the need arises for LEP outreach, the CVTPA - RPA17 region will consider the alternate options.
- When staff prepares a document, advertisement 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.

VI. MONITORING

Monitoring and Updating the LEP Plan- the CVTPA - RPA17 Region 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 identified a higher concentration of LEP individuals are present in the CVTPA-RPA17 Region service area. Updates will include:

- Determination of the current LEP population in the service area.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- 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.

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- Determine whether the CVTPA - RPA17 Region’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether the CVTPA - RPA17 Region fully complies with the goals of this LEP Plan.

VII. DISSEMINATION OF CVTPA - RPA17 Region LEP PLAN

Post signs at the Chariton Valley Planning & Development Council office located at 308 North 12th Street, Centerville, Iowa 52544 notifying LEP persons of the LEP Plan and how to access languageservices.

LEP was discussed and reviewed by both the Technical Committee and Policy Board on this day. Final approval and adoption this day, _____, 2022.

Technical Committee Chairman

Policy Board Chairman

Witness: _____
Nichole L. Moore, Executive Director

Date: _____

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