



# **Limited English Proficiency Plan City Of Camas**

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## Limited English Proficiency Plan

Most persons living in the United States read, write, speak, and understand English. There are many persons, however, for whom English is not their primary language. If those persons have a limited ability to read, write, speak or understand English, they are considered limited English proficient, or “LEP.” Language barriers often inhibit, or prohibit, LEP persons from accessing benefits and services, from understanding and exercising rights, from fulfilling responsibilities and obligations, and from understanding information provided to them regarding federally funded programs, activities, and services.

The City of Camas (Camas), a municipal corporation of the state of Washington, as a recipient of state and federal financial assistance, will comply with Title VI of the Civil Rights Act (Act) of 1964 and its implementing regulations and other pertinent directives, to the end that in accordance with the Act, regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, religion, sex, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance through the Washington State Department of Transportation, including the U.S. Department of Transportation and Federal Highway Administration.

The City of Camas welcomes and encourages the participation of all of its citizens, including those with LEP, in its activities. A special effort will be made to ensure that persons with special needs have opportunities to participate. The City will provide interpreters and/or translation services for LEP persons who request assistance. Persons who need auxiliary aids or other assistance to be able to fully participate may request assistance.

Therefore, in accordance with the best practice standards for public involvement, together with assistance from the Washington State Department of Transportation (WSDOT) and other federal agencies, Camas has developed this Language Implementation Plan for Limited English Proficiency Persons. The LEP Plan outlines:

- ❖ how persons who may need language assistance are identified;
- ❖ the ways in which assistance is provided;
- ❖ provide staff with resource information and training; and
- ❖ how LEP persons are notified assistance is available.

The goal of the LEP Plan is to ensure all residents of the City of Camas can, to the fullest extent practicable, participate in Camas activities.

## Title VI and Executive Order 13166

Section 601 of Title VI of the Civil Rights Act of 1964, codified as amended (42 U.S.C. § 2000d), provides that no person in the United States shall “on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Consistent

therewith, and in accordance with section 602 of Title VI, (42 U.S.C. § 2000d-1), the Department of Justice promulgated regulations prohibiting recipients of federal funds from “utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin.” The USDOT later promulgated nearly identical regulations (See 49 C.F.R. § 21.5(b) (vii) (2). To further clarify rights protected by Title VI, President William J. Clinton, on August 11, 2000, issued Executive Order 13166, Improving Access to Service for Persons with Limited English Proficiency. The order requires each federal agency to examine its programs and activities and to develop and implement plans so LEP persons can meaningfully access those programs and activities. That Executive Order includes the following statement.

Each Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.

In conjunction with Executive Order 13166, the Department of Justice issued a general guidance document setting forth various principles for agencies to consider in developing guidance documents for recipients of federal funds (See Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination against Persons with Limited English Proficiency, 65 Fed. Reg. 50123).

## **USDOT and LEP Policy Guidance**

In accordance with Executive Order 13166, the USDOT, on December 14, 2005, issued its Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons. Adopting the framework established by the Department of Justice in its August 11, 2000, Guidance, the USDOT identifies four factors that should be considered by a recipient of federal funds in assessing the needs of LEP persons and implementing a plan to address those needs.

The four factors include:

1. the number or proportion of LEP persons served or encountered in the eligible service population;
2. the frequency with which LEP individuals come in contact with the programs, activities, or services;
3. the nature and importance to LEP persons of your programs, activities, and services; and
4. the resources available to the recipient and costs

The greater the number or proportion of eligible LEP persons, the greater the frequency with which they will have contact with a program, activity, or service and the more likely enhanced language services will be needed. The intent is to strike a balance ensuring LEP persons have meaningful access to critical services without unduly burdening the local agency.

## LEP Assessment for the City of Camas

### *Factor 1: The number or proportion of LEP persons served or encountered in the eligible service population*

To understand the profile of persons that may participate in Camas activities, the most recent United States Census data was used. For the purposes of this LEP Plan, persons who identified themselves as speaking English less than “very well” are considered LEP persons. The table below summarizes the relevant information derived from the United States Census Bureau 2008-2012 American Community Survey (ACS) 5-year Estimates – Table b16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years of Age and Over.

Language Spoken at Home for City of Camas, WA	Total Persons (over 5 years)	MoE +/-	% of Total Population (over 5 years)	MoE +/-
Korean	160	77	0.86%	0.41%
Russian	80	63	0.43%	0.34%
Chinese	76	65	0.41%	0.35%
Other Indo-European languages	58	56	0.31%	0.30%
Other West Germanic languages	39	47	0.21%	0.25%
Other non-English	146	141	0.78%	0.75%
<b>Total LEP Population</b>	<b>559</b>	<b>198</b>	<b>3.00%</b>	<b>1.06%</b>
Total Population	18,652			

Notes: Prepared by RTC staff based on data from the 2009-2013 ACS (Table 16001) "MoE stands for margin of error based on the sampled data

### *Factor 2: The frequency with which LEP individuals come in contact with the programs, activities, or services*

The previous analysis shows that approximately three (3) percent of Camas’ population is LEP persons, with the majority speaking Korean (0.86%), Russian (0.43%), and Chinese (0.41%). Interpretation and translation for these languages are the most likely to be requested. To date, Camas has received no requests, formal or otherwise, by LEP persons seeking the translation of documents or interpreters at public meetings. In 2014, the Camas Police Department received four (4) requests for language services. They are outlined as follows:

- ❖ On May 22, 2014, language services were provided on three occasions, within a two hour window, to a Russian speaking individual by Camas Police Department personnel.
- ❖ On September 14, 2014, language services were provided on one occasion to a Spanish speaking individual by Camas Police Department personnel.

While contact with LEP individuals has been limited, Camas staff remains committed to engaging and involving all residents of the City of Camas, including those with LEP and seeking to remove linguistic barriers to full participation.



***Factor 3: the nature and importance to LEP persons of your programs, activities, and services***

The City of Camas welcomes and encourages the participation and input of all of its citizens or their representatives, including those with LEP, in its activities. Public Hearing Notices and City Council meeting agendas and minutes are posted on the Camas website, as well as, the Camas Municipal Center, Camas Public Library, and Camas Post Office.

Notices are published in the Camas-Washougal Post-Record. For example, Public Hearing notices, modifications to regularly scheduled meetings (City Council, Parks Commission, Planning Commission, etc.), notices for special meetings (State of the Union, Ward meetings, project or planning related meetings, Ward meetings, Open Houses, and other public meetings). The notices are also posted on the Camas website, at the Camas Municipal Center, Camas Public Library, and Camas Post Office.

Camas staff is available to address community organizations as requested. Staff fields inquiries from the public regarding transportation projects, other planning activities, and aging services. Camas frequently updates its website to allow residents to learn about and follow City activities.

***Factor 4: The resources available to Camas and costs of providing language assistance***

The fourth factor of the analysis weighs the preceding three factors to assess the needs of LEP persons within the City of Camas compared with the resources available and the costs of providing access. Camas is committed to offering all residents in the region the opportunity to participate in and receive services from Camas' activities. The LEP Implementation Plan described below uses cost-efficient and productive measures to ensure language barriers are not preventing LEP persons from participating meaningfully in Camas' activities.

**LEP Implementation Plan**

The key to providing meaningful access to LEP persons is to ensure that Camas and LEP persons can communicate effectively and act appropriately based on that communication. Camas will take reasonable steps to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate fully and effectively in Camas programs and activities.

***Needs Assessment***

The LEP Assessment for Camas indicates that Korean, Russian, and Chinese speakers are the most likely LEP persons Camas staff will encounter. However, these are not the only languages, and when Camas staff encounter a LEP person, often the language will not be known. Camas staff will use Language Identification Flashcards (a.k.a. I Speak Cards) to identify a person's primary language.

Camas has developed an Interpreter / Translation Services Information Packet (packet). The packet has been distributed to all City departments. The packet provides contact information and guidance in requesting language services (i.e., Limited English Proficiency, American Sign Language, and assistance for Deaf, Deaf-Blind, Blind, or Hard of Hearing individuals). Language Identification Flashcards are included in the packet.

Language Identification Flashcards, as developed by the United States Census Bureau, bear the phrase "Mark this box if you read or speak [name of language]" translated into 38 different

languages. The LEP person can then denote the language, and staff can respond as appropriate to provide or obtain assistance. The Language Identification Flashcards may be downloaded at: <http://www.lep.gov/ISpeakCards2004.pdf>.

Once a LEP person's primary language is identified using the flashcards, Camas staff will assess which language assistance measures would be most appropriate to assist the person to participate fully and effectively in Camas programs and activities.

## Language Assistance Plan

Camas uses Language Assistance Measures to provide meaningful, early and continuous opportunities for all interested residents to participate in the dialogue that informs key decisions, regardless of language barriers. These creative, low-cost solutions include:

### *Measures for Written Documents*

Much of the public's interaction with Camas is through its website: [www.cityofcamas.us](http://www.cityofcamas.us). In the website, under Public Notices and Hearing Information, Camas provides notices of upcoming public meetings. On this page, we offer contact information and a quick email links for many Camas departments. The phone number listed is not answered by an auto-attendant and is attended during normal business hours.

Translation services are offered upon request in written or oral interpretation. On larger documents, when appropriate, staff will work with the LEP person and an interpreter to provide translation services for those parts of interest.

### *Measures for Oral Communication*

When Camas receives a request for oral language assistance, staff members will follow these steps, as needed:

- A. When receiving a call from an LEP person
  1. Use Conference Hold to place the limited English speaker on hold.
  2. Dial one of the language service providers listed in the Camas Interpreter / Translation Services Information packet.
  3. Enter our client identification number or provide it to the representative.
  4. An interpreter will be connected to the call.
  5. Brief the interpreter. Summarize what you wish to accomplish and provide any special instructions.
    - o If you need assistance placing a call to a limited-English speaker, please inform the interpreter at the beginning of the call.
  6. Add the limited-English speaker to the line.
  7. Say "End of Call" to the interpreter when the call is completed.
  8. The offer of a certified interpreter will always be made, regardless of the availability of a family member, friend or volunteer for interpretation.

- B. LEP individual requesting assistance in person, not while participating in a public meeting
1. Use the Language Identification Flashcards, if needed, to determine the person's primary language. These cards are available at the front desk.
  2. Direct the LEP person to an open conference room or private office.
  3. Use the telephone interpreter service as noted above.
  4. The offer of a certified interpreter will always be made, regardless of the availability of a family member, friend or volunteer for interpretation.
- C. LEP individual requesting assistance in person, while participating in a public meeting
1. Use the Language Identification Flashcards, if needed, to determine the person's primary language. These cards are available at the front desk.
  2. Using the meeting room's telephone, use the interpreter service as noted above.
  3. The offer of a certified interpreter will always be made, regardless of the availability of a family member, friend or volunteer for interpretation.
- D. To accommodate a person who is deaf, deaf-blind, hard of hearing or speech impaired by means of a text telephone (TTY) using standard (voice) communication
1. Dial the voice number provided in the Camas Interpreter / Translation Services Information packet.
  2. Give the relay operator the telephone number of the party you wish to call. And, provide any further instructions to the operator.
  3. The relay operator will process your call, relaying exactly what the TTY user is typing to you, as well as, exactly what you are saying to the TTY user.

### **Visualization**

Visualization techniques are one way to communicate with LEP or low-literacy persons. Camas uses visualization techniques such as maps, charts, graphs, illustrations, presentations and videos at all types of meetings and in all types of printed materials to explain concepts behind actions and decision-making. Camas may also use handouts and posters to display visual information. Many of Camas' meeting rooms are equipped with computers, projectors, and sound systems for displaying visual and audio information. Visualization materials will be translated for an LEP person upon request.

### **Agendas**

The agendas for Camas public meetings include instruction on how to get materials and services in alternative formats and nondiscrimination notifications. The notification reads:

The City of Camas welcomes and encourages the participation of all of its citizens in the public meeting process. A special effort will be made to ensure that a person with special needs has the opportunity to participate. For more information, please call 360.834.6864.



### ***Staff Training***

In order to establish meaningful access to information and services for LEP individuals, Camas has developed an Interpreter / Translation Services Information Packet (packet). The packet has been distributed to all City departments. The packet provides contact information and guidance in requesting language services (i.e., Limited English Proficiency, American Sign Language, and assistance for Deaf, Deaf-Blind, Blind, or Hard of Hearing individuals). Language Identification cards are included in the packet. Information offered in the packet will assist staff in providing services to LEP individuals who request assistance using the measures outlined above.

### ***Monitoring***

This LEP Plan will be incorporated in to Camas' Title VI Plan, and Camas' Title VI Coordinator will report on requests for language assistance in the Camas' annual Title VI Report to the Washington State Department of Transportation. Camas will adjust practices to meet language assistance needs and demands and periodically update this plan to reflect any changes.