

Limited English Proficiency (LEP) Plan

Introduction

This *Limited English Proficiency Plan* has been prepared to address the City of West Sacramento responsibilities as a recipient of federal funds 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 se, 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 federal 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 the City of West Sacramento, which receives federal grant funding as a subrecipient through the Sacramento Area Council of Governments (SACOG) from the U.S. Department of Transportation (U.S. DOT), and from state agencies.

Plan Summary

The City of West Sacramento 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 by the City of West Sacramento. 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, 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, the City of West Sacramento undertook the U.S. DOT 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 or are likely to encounter a City of West Sacramento program, activity or service.
2. The frequency with which LEP persons come in contact with City of West Sacramento services, programs, or activities.
3. The nature and importance of programs, activities or services provided by the City West Sacramento to the LEP population.
4. The resources available to the City of West Sacramento and overall cost to provide LEP assistance.

A summary of the results of the City of West Sacramento four-factor analysis is in the following section.

U.S. DOT Four-Factor LEP Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City of West Sacramento program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The

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classifications are “very well,” “well,” “not well” and “not at all.” For planning purposes, the City of West Sacramento is considering people that speak English “not well” or “not at all” as Limited English Proficient persons.

Table 1 shows the languages spoken at home for all persons five years old and older, with number and percentage of persons broken out by County and language within the City of West Sacramento.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER
(Source: American Community Survey)

Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	49,960	±492	(X)	(X)	17.6%	±3.1
Speak only English	29,742	±1,854	59.5%	±3.6	(X)	(X)
Speak a language other than English	20,218	±1,823	40.5%	±3.6	43.5%	±5.1
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	11,078	±1,531	22.2%	±3.1	44.9%	±7.7
5 to 17 years old	2,684	±684	5.4%	±1.4	28.1%	±15.3
18 to 64 years old	7,480	±963	15.0%	±1.9	50.7%	±6.9
65 years old and over	914	±249	1.8%	±0.5	46.2%	±12.1
Other Indo-European languages	6,333	±914	12.7%	±1.8	46.7%	
5 to 17 years old	1,402	±502	2.8%	±1.0	40.5%	±23.1
18 to 64 years old	4,136	±604	8.3%	±1.2	41.3%	±7.9
65 years old and over	795	±289	1.6%	±0.6	85.8%	±10.3
Asian and Pacific Island languages	2,617	±536	5.2%	±1.1	31.5%	±8.1
5 to 17 years old	123	±99	0.2%	±0.2	22.8%	±26.7
18 to 64 years old	2,109	±481	4.2%	±1.0	26.0%	±7.5
65 years old and over	385	±143	0.8%	±0.3	64.4%	±18.5
Other languages	190	±155	0.4%	±0.3	21.1%	±15.6
5 to 17 years old	43	±50	0.1%	±0.1	0.0%	±50.2
18 to 64 years old	127	±113	0.3%	±0.2	31.5%	±16.6
65 years old and over	20	±30	0.0%	±0.1	0.0%	±73.6
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	33,907	±1,061	(X)	(X)	11.1%	±2.1
Speak only English	23,011	±1,351	67.9%	±3.2	(X)	(X)
Speak a language other than English	10,896	±1,093	32.1%	±3.2	34.6%	±4.7
Spanish	5,355	±911	15.8%	±2.7	34.8%	±7.2
Other languages	5,541	±711	16.3%	±2.1	34.5%	±6.0

2. The frequency with which LEP persons come in contact with City of West Sacramento services, programs, or activities.

The City of West Sacramento assessed the frequency with which staff have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
West Sacramento On-Demand (Via) Driver	Frequently
Customer Service Agents/City Staff	Frequently
Recreation Center Staff	Often - Frequently
Printed Materials	Often - Frequently
Interior Signage	Frequently
City Website	Often
Social Media	Occasionally

SECONDARY TOUCH-POINTS	FREQUENCY
Print Media	Infrequent
Broadcast Media	Infrequent
Public Relations Media	Occasionally

The City's Human Resources Division retains a list which lists all City staff which are certified translators for various languages. City staff do not regularly receive requests for translation through Federally funded programs/projects, though the outreach components of said programs/projects do typically have multi-lingual resources. Further, if translation services are needed, staff will provide said translation in a timely manner.

- 3. The nature and importance of programs, activities or services provided by the City of West Sacramento to the LEP population.*

The largest geographic concentration of LEP individuals in the City of West Sacramento area is Spanish. The West Sacramento On-Demand (Via) drivers are most likely to encounter LEP individuals along with City customer service personnel. As stated above, City staff do not regularly receive requests for translation, but if translation services are needed, staff will provide said translation in a timely manner.

- 4. The resources available to the City of West Sacramento and overall cost to provide LEP assistance.*

The City of West Sacramento assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the City of West Sacramento could partner with for outreach and translation efforts. Based on the four-factor analysis, the city developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise the City of West Sacramento's LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP persons
5. Monitoring and updating the LEP Plan

a. Identifying LEP individuals who need language assistance

How the City of West Sacramento may identify an LEP person who needs language assistance:

- Examine city customer service and West Sacramento On-Demand records for language assistance requests that have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When the City of West Sacramento sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation, it is possible to informally gauge each attendee's ability to speak and understand English.
- Have Census Bureau Language Identification Flashcards available at City of West Sacramento events near the registration table. Individuals self-identifying as persons not

proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.

- Have Language Identification Flashcards on all transit vehicles to assist staff in identifying specific language assistance needs of passengers. If such individuals are encountered, staff will be instructed to try to obtain contact information to give to the Operations Manager for follow-up. CSA's will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone, recording passengers' request for language assistance in the customer service database.

b. Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which the City of West Sacramento staff responds to LEP persons, whether in person, by telephone or in writing.

How the City of West Sacramento will assist an LEP person who needs language assistance:

- The City of West Sacramento will network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on City programs and services.
- The City will strive to make bilingual assistance available at community events.
- Placement of statements in notices and publications that interpreter services are available for key meetings, with seven day advance notice.
- Survey staff annually on their experience concerning any contacts with LEP persons during the previous year.
- Maintain a list of staff proficient in languages other than English.
- Provide Language Identification Flashcards at public meetings.
- Post the City of West Sacramento Title VI Policy, Title VI Complaint Form, and LEP Plan on the agency website.
- Post the City of West Sacramento Title VI Policy in English and Spanish in the City Hall 1st floor lobby in a highly visible location.
- Provide the Title VI Complaint Form in a printed format in English and Spanish in the City Hall 1st floor lobby in a highly visible location.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from the list which lists all City staff which are certified translators for various languages.

c. Staff Training

How the City of West Sacramento will train staff on its role and responsibilities in providing meaningful access to services for LEP persons:

- Develop curriculum and corresponding PowerPoint to educate City of West Sacramento and contractor staff on the Title VI LEP requirements for providing meaningful access to services for LEP persons.
- Provide staff with a description of language assistance services offered by the City of West Sacramento.
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI LEP complaint.
- Instruct staff on the use of U.S. Census Bureau Language Identification Flashcards (**See Attachment 1**)

d. Providing Notice to LEP Persons

How the City of West Sacramento will provide Notice to LEP Persons, both oral and written

communications:

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- Signs “Title VI is the Law” to be posted in the entry areas.
- At service counters Language Identification cards regarding the availability of interpreting services free of charge.
- Website, documents, community meeting notices, and brochures will be offered or printed in alternative languages upon request free of charge.
- Staff will inform LEP persons that language assistance is available and is free of charge.

e. Monitoring and updating the LEP plan

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services. The City of West Sacramento will update the LEP as required by state and federal law. At a minimum, the plan will be reviewed and updated when new data becomes available, or when it is clear that higher concentrations of LEP individuals are present in the City of West Sacramento.

How the City of West Sacramento will examine and update the LEP Plan:

- Record and report on the number of LEP persons encountered annually
- Determine how the needs of LEP persons have been addressed
- Determine the current LEP population in the service area and whether the need for translation services has changed
- Determine whether interpretation/translation services have been effective and sufficient to meet the need
- Determine whether the City of West Sacramento’s financial resources are sufficient to fund language assistance resources needed
- Determine whether the City of West Sacramento (and its agents/contractors) have fully complied 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 West Sacramento LEP Plan

The City of West Sacramento’s LEP Plan will be disseminated to customers and the community through a link to the LEP Plan and the Title VI Plan included on the city website, www.cityofwestsacramento.org

The City of West Sacramento’s LEP Plan will also be shared with human service organizations in its service area. Any person or agency with internet access will be able to access and download the plan from the city website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost.

LEP individuals may request copies of the plan in translation which the City of West Sacramento will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the City of West Sacramento’s Title VI Coordinator at:

Title VI Coordinator
City of West Sacramento
1110 West Capitol Avenue
West Sacramento, CA 95691

34- West Sacramento Title VI and LEP Program

Phone: 916-617-4980

Email: TitleVI@cityofwestsacramento.org