

**Limited English Proficiency (LEP) Plan  
Clermont Senior Services, Inc.**

## INTRODUCTION

This Limited English Proficiency Plan has been prepared to address Clermont Senior Services, Inc. responsibilities as a recipient of federal financial assistance relating 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. §2000 et seq.; 45 CFR §80, 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 customers clarifying their obligation to ensure that such discrimination does not take place.

## Plan Summary

Clermont Senior Services, Inc. (CSSI) 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 programs and/or services. By definition, 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, CSSI 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 CSSI program, activity or service.
2. The frequency with which LEP persons come in contact with CSSI programs, activities or services.
3. The nature and importance of programs, activities or services provided by CSSI to the LEP population.
4. The resources available to CSSI; and the overall cost to provide LEP assistance.

## Four-Factor Analysis

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

CSSI staff reviewed the U. S. Census information related to 2006 estimates and determined that 3.1% (5,974) of the overall population (age 5+) speak a language other than English at home. In the State of Ohio, 6.1% of the overall population (age 5+) speaks a language other than English at home.

According to the 2000 U. C. census results, 519 of 1,915 Hispanic-speaking persons, 558 of 2,398 Indo-European speaking persons' and 256 of 586 Asian/Pacific Island-speaking persons, speak English "less than very well." This, along with other languages not identified, reflects a total of 1,407 residents speak English "less than very well."

**2. The frequency with which LEP persons come in contact with CSSI programs, activities or services.**

CSSI staff assesses the frequency at which they have, or could possibly have, contact with LEP persons upon intake. This includes documenting phone inquiries and verbally surveying drivers. Since January 2007, CSSI has had 11 requests for interpreters or for translated CSSI documents. The staff has very little contact with LEP persons.

**3. The nature and importance of programs, activities or services provided by CSSI to the LEP population.**

There is no large geographic concentration of any type of LEP persons in the CSSI service area. The overwhelming majority, 96.9%, of the population in Clermont County speak English in their homes. As a result, there is a lack of social, service, professional and leadership organizations within the CSSI service area that focus on outreach to LEP persons.

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

CSSI has no available resources budgeted that can be used for providing LEP assistance. LEP assistance that should be provided includes having an interpreter and translation service available. We could determine which documents would be the most valuable to be translated if and when the population supports. We have taken an inventory of available organizations, government agencies and individuals that CSSI has partnered with for translation efforts, and we will determine what level of staff training is needed.

After analyzing the four factors, CSSI developed the plan outlined in the following section for assisting persons of limited English proficiency.

## Policy

It is the policy of Clermont Senior Services, Inc. to provide meaningful access to its programs and services to persons who are limited in English Proficiency. Meaningful access involves Clermont Senior Services, Inc. promoting effective communication to LEP persons seeking and/or receiving participation in programs and/or services administered by, supervised by, authorized by and/or participated in by Clermont Senior Services, Inc. and funded in whole or in part by federal funds.

**Meaningful Access** - Access which results in accurate and effective communication that does not result in undue delay or denial of services to which the LEP applicant/recipient is eligible.

**Limited in English Proficiency** - Those whose proficiency in speaking, reading, writing, or understanding English is such that it would deny or limit their meaningful access to programs and services provided by the Agency if language assistance were not provided.

## Outline

How CSSI staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- At CSSI events or service locations participants are greeted as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.
- Have the Census Bureau's "I Speak Cards" at the center activities or events sign-in table. While staff may not be able to provide translation assistance on-site, the cards are an excellent tool to identify language needs for future needs.
- Have "I Speak Cards" as required documentation for all direct services staff to have on hand to assist in identifying specific language assistance needs of customers.
- "I Speak Cards" will be available at the CSSI office at 2085 James E. Sauls, Sr. Drive, Batavia, Ohio 45103. It will be especially important for CSSI to have these cards available since the agency provides for the service needs of older adults in Clermont County.
- Vehicle operators and other front-line staff, like dispatchers, schedulers, home care and case management personnel, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.

## Language Assistance Measures

Although there is a very low percentage in Clermont County of LEP individuals, that is, persons who speak English "not well" or "not at all", CSSI will ensure that the following measures are in place:

- “I Speak Cards” will be available at all times with direct service staff, at the CSSI Central Office, with case managers, and at senior centers.
- When the CSSI website is re-designed, a feature will be added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.
- The Limited English Proficiency Plan will be posted on the agency website, [www.clermontseniors.com](http://www.clermontseniors.com).
- When the CSSI website is redesigned, CSSI staff will work with the website host to try to have the AltaVista Babel Fish service, or a comparable online translation service, added to the site.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services at [www.languageline.com](http://www.languageline.com).

## **Staff Training**

The following training will be provided to all CSSI staff:

- Information on the CSSI Policy and LEP responsibilities. (Annual and Orientation)
- Methods of providing service to LEP persons.
- Description of language assistance services offered to the public.
- Use of the “I Speak Cards.”
- Documentation of language assistance requests.
- Use of language line service.
- How to handle a potential LEP complaint.

## **Outreach Techniques**

Due to the very small local LEP population, CSSI does not have a formal outreach procedure in place as of 2008. Translation resources are also very limited in this region. However, when and if the need arises for LEP outreach, CSSI will consider the following options:

- When staff prepares a document, or schedules an activity, for which the target audience is expected to include LEP persons, then documents, activity notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Center schedules will be made available in an alternative language when and if a specific and concentrated LEP population is identified.

## **Monitoring and Updating the LEP Plan**

CSSI will update the LEP as required. At a minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP persons are present in the CSSI service area. 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 CSSI financial resources are sufficient to fund language assistance resources needed.
- Determine whether CSSI has 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 persons.
- Dissemination of the CSSI LEP Plan.

Any person or agency with internet access will be able to access and download the plan from the CSSI website ([www.clermontseniors.com](http://www.clermontseniors.com)). 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 persons may request copies of the plan in translation which CSSI will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the CSSI Executive Director as follows:

George R. Brown, Executive Director  
Clermont Senior Services, Inc.  
2085 James E. Sauls, Sr. Drive  
Batavia, OH 45103  
513.724.1255  
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Attachments: Language Identification "I Speak..." Cards  
LEP Resources

Effective Date: 12/01/2008  
Revised Date:

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