



## **Camden County Developmental Disability Resources**

**Limited English Proficiency Plan (LEP)**

**2014**

**Adopted by CCDDR Board of Directors**

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CCDDR LEP Plan

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## **Federal Requirements**

**Agencies receiving Federal Transit Administration (FTA) funds from MoDot with a vehicle still in service funded through a MoDot administered FTA grant requires a Limited English Proficiency Plan (LEP).**

## **Background of Limited English Proficiency (LEP) Plan**

As there is no official language of the United States, persons with a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." This language barrier may prevent individuals from accessing public services and benefits.

Title VI of the Civil Rights Act of 1964 is the legal basis for LEP regulations that does not allow national origin discrimination. Title VI of the Civil Rights Act and Executive Order 13166, are the federal legislation necessitating LEP plans from public agencies receiving federal funds.

Camden County Developmental Disability Resources agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964 as amended, 42 U.S.C. 200d et seq.

Camden County Developmental Disability Resources assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. Camden County Developmental Disability Resources further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

This Limited English Proficiency (LEP) Plan has been prepared to address Camden County Developmental Disability Resources responsibilities as a recipient of federal, state and county funding to relate to the needs of individuals with limited English language skills. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, which states that no person in the United States shall be subjected to discrimination on the basis of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance.

Federal financial assistance includes grants, training, use of equipment, and other forms of financial contributions from federal sources. Executive Order 13166 was signed by President William Clinton August 11, 2000. Executive Order 13166 is titled "Improving Access to Services with Limited English Proficiency." Executive Order 13166 indicates that differential treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. Executive Order 13166 also requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place.

The Executive Order applies to all federal agencies and all programs and operations entities that receive funding from the federal government – including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients such as public transit agencies. Sub recipients are also covered, when federal funds are passed from one recipient to a sub recipient. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1A, "Title VI and Title VI-Dependent Guidelines for FTA Recipients," which was published on April 13, 2007. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

US DOT states that their intent is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments. Smaller recipients with limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

## **Introduction**

Camden County Developmental Disability Resources has written this Limited English Proficiency Plan to address our agency's responsibility as a recipient of federal grant funding to relate to the needs of our clients with developmental disabilities and have limited English skills.

The LEP plan has been written using the guidelines of Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

This plan was prepared using the four-factor analysis for LEP persons. The four-factor analysis and a summary of the results from the Camden County 2010 census for each factor are listed beneath each numbered factor.

## **Camden County Developmental Disability Resources LEP Plan**

### **Elements of an Effective LEP (Plan)**

The US Department of Justice, Civil Rights Division has developed a set of planning elements that were incorporated into the design of the Limited English Proficiency Plan. These elements are:

1. Identifying LEP persons
2. Identifying ways in which language assistance will be provided
3. Training staff
4. Providing notice to LEP persons

Camden County Developmental Disability Resources obtained the figures used in this report from the 2010 U.S. Census.

### **The Four-Factor Analysis**

The DOT (Department of Transportation) guidance outlines Four Factors that recipients should apply to the various kinds of contact they have with the public in order to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons.

These factors are:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

**Language Spoken at Home in Camden in Camden County by:**

		<b>Percentage</b>
<b>Total Population</b>	<b>43,845</b>	
<b>English Only</b>	42,486	96.90%
<b>Spanish</b>	<b>702</b>	1.60%
Speak English Very Well	503	71.70%
Speak English Well	57	8.10%
Speak English Not Well	92	13.10%
Do not speak English at all	50	7.10%
<b>Other Indo-European Language</b>	<b>570</b>	1.30%
Speak English Very Well	456	80%
Speak English Well	68	12%
Speak English Not Well	46	8%
<b>Speak Asian or Pacific Island Language</b>	<b>44</b>	0.10%
Speak English Very Well	28	65%
Speak English Well	11	24%
Speak English Not Well	5	11%
<b>Speak Other Language</b>	<b>44</b>	0.10%
Speak English Very Well	44	100%

2. The frequency with which LEP individuals come in contact with the program.

The largest Camden County racial/ethnic groups are white (93.2%) followed by Hispanic (3.7% and two or more races (1.9%). To date Camden County Developmental Disability Resources (CCDDR) has one LEP family. Translation services are provided by a CCDDR Support Coordinator. Due to the small size of the LEP population in Camden County, LEP Involvement is very infrequent.

3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.

The largest population of LEP persons in Camden County is Spanish speaking. CCDDR is more likely to encounter LEP persons than any other service provided in the area.

4. The Resources available to the recipient and the overall cost.

CCDDR has a Support Coordinator that speaks Spanish; therefore, no additional cost would be incurred for an interpreter and/or translator for the Hispanic population which represents the greatest percentage of non-English speaking individuals in Camden County. The Support Coordinators carry electronic tablets when visiting clients. If a client does not speak English, or Spanish, the electronic tablet could be utilized as a tool for translation until an interpreter and/or translator was located for assistance.

### **Language Assistance & Staff Training**

Camden County Developmental Disability Resources' staff will be provided with information on the Title VI Policy and the LEP plan. Language interpretation will be considered for all other languages if the need arises. CCDDR Support Coordination will be questioned periodically on any experiences concerning contacts with LEP persons during the previous year. The remaining individuals unable to speak English or Spanish represent less than .2% of Camden County's total population. As there is a small LEP population in Camden County, there is no translation of documents in place; however, if this becomes necessary, then documents, meeting notices, flyers, agendas, etc will be printed in the language needed for the LEP population.

### **Monitoring**

Camden County Developmental Disability Resources will review and update their LEP Plan as necessary. New updates will include relocation of disabled persons that may be limited English proficient into Camden County and the incorporating of new Census data as received.