

Appendix D

Policy and Plan for Engaging Individuals with Limited English Proficiency (LEP)

The City of Lake Charles policy for engaging individuals with limited English proficiency is to provide translation services to anyone who requests them, if reasonable accommodation can be made.

The City keeps an up to date list of individuals with intermediate language skills. The Title VI Coordinator is prepared with this information and contact information for on call translators in case someone comes into the office who has limited English proficiency.

Background Information:

The City of Lake Charles followed U.S. Department of Justice guidance using a “four-factor analysis” process to determine the number and proportion of LEP individuals in the community and how to cost effectively provide information services to these individuals. The guidance also offers a safe harbor of 5% of the effected population or 1,000 people in the effected neighborhood. The “four-factor analysis” process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact with the program, the importance of the program to people’s lives, and the resources available to provide translation services.¹

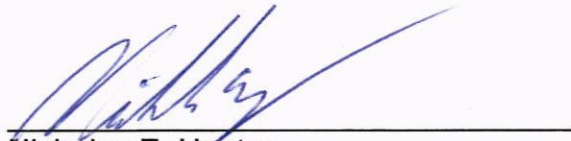
The results of the “four-factor analysis” showed that there is not a great need for translation services. (The Lake Charles Urbanized Metropolitan Planning Organization’s urban service area is under 200,000 population and only covers the portions of the Parish of Calcasieu, which include the cities of Sulphur, Lake Charles, and Westlake.)

A minimal number of languages are spoken within the urban area, but proportionally the percentages of people speaking a language other than English at home is relatively low. The number of people reporting that they also speak English “very well” or “well” offset this even more.

¹ This language was taken directly from the U.S. Government’s Limited English Proficiency website, <http://www.lep.gov/recipbroch.html>.

According to the Census 2010, the top three languages spoken at home in the region are English, Acadian French, and Spanish.

The frequency and extent with which LEP individuals come into contact with City of Lake Charles programs is estimated to be quite low. The City however encourages public comment on its policies, programs, and funding cycles, and would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals. The City of Lake Charles remains committed to providing translation services to people who request them and have come up with creative solutions to assist LEP individuals and show the City's interest in providing translation services.



Nicholas E. Hunter
Mayor
City of Lake Charles

12/05/2018
Date

Limited English Proficiency Plan

Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and nonprofit entities, and sub recipients.

Plan Summary

The City of Lake Charles has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.