

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

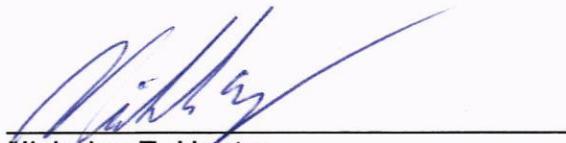
The results of the “four-factor analysis” showed that there is not a great need for translation services. (The Lake Charles Urbanized Metropolitan Planning Organization’s urban service area is under 200,000 population and only covers the portions of the Parish of Calcasieu, which include the cities of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

In developing the plan while determining the City's extent of obligation to provide LEP services, the City of Lake Charles undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the Lake Charles service area or likely to encounter a City program, activity, or service;
- 2) The frequency with which LEP individuals come in contact with City service;
- 3) The nature and importance of the program, activity, or service provided by City of Lake Charles to the LEP population; and
- 4) The resources available to the City of Lake Charles and overall costs to provide LEP assistance.

A brief description of these considerations is provided in the following section.

Four Factor Analysis

1. The number or proportion of LEP persons eligible in the Lake Charles service area or likely to encounter a City program, activity, or service

The City of Lake Charles examined the U.S. Census Bureau's data for the 2010 year census and was able to determine that approximately 9.6% of the LCMPO boundary population age 5 and older spoke a language other than English at home. Hispanics speaking Spanish reported 2.3% and French Acadian reported 5.8%, which comprised the largest non-English speaking language groups in the LCMPO boundary. French Acadian's reported to speak a non-English language spoke French as a second language with English first. Translation assistance is extremely minimal.

Below you will find the population by race - 2010 census. As indicated, not all races are indicated.

POPULATION BY RACE City of Lake Charles July 1, 2017		
Race	Population	Percentages
White	35,011	45.4%
Black	37,633	48.8%
Asian	1,542	2.0%
Hispanic	2,931	3.8%
Total	77,117	100.0%

2. The frequency with which LEP individuals come in contact with City service

Using the attached survey of customers and personal interviews with staff, there are six (6) Hispanic customers who speak very little English.

The total number of persons using Transit Services is 98. Of this number, approximately 6 are LEP persons. The number of Para Transit users that returned the surveys are 39 and 4 were LEP persons. These figures were attained from the City of Lake Charles Transit Office. Attached you will find a copy of the survey.

**CITY OF LAKE CHARLES TRANSIT
QUESTIONNAIRE
Fixed Routes**

- | | | |
|---|-------|--------|
| 1. Would you like weekend service? | Y | N |
| 2. Would you like extended hours? | Y | N |
| 3. How often do you use the transit system | Daily | Weekly |
| 4. Is the transit service dependable? | Y | N |
| 5. Are you satisfied with the transit services? | Y | N |

Please check one:

- White Black American Indian
 Asian Native Hawaiian/Pacific Islander
 Hispanic Other _____
 Two or more races _____

The City of Lake Charles fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Complaint Form, see the City of Lake Charles' website—www.cityoflakecharles.com or call the Mayor's Action Line at (337) 491-1346, or contact the Public Works Director at (337) 491-1220, or call the Title VI Coordinator at (337) 491-1440.

**CITY OF LAKE CHARLES TRANSIT
QUESTIONNAIRE
Demand Routes—Para Transit**

- | | | |
|---|-------|--------|
| 1. Would you like weekend service? | Y | N |
| 2. Would you like extended hours? | Y | N |
| 3. How often do you use the transit system | Daily | Weekly |
| 4. Is the transit service dependable? | Y | N |
| 5. Are you satisfied with the transit services? | Y | N |

Please check one:

- White Black American Indian
 Asian Native Hawaiian/Pacific Islander
 Hispanic Other _____
 Two or more races _____

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Limited Four Factor Analysis

The City of Lake Charles examined the U.S. Census Bureau's data for the 2000 year census and was able to determine that approximately 0.3% or 1,715 persons of the LCMPO boundary population, age 5 and older, did not speak English "very well." Ethnicities that did not speak English "very well" were

Hispanics	404
Indo European Language	1027
Asian and Pacific Island	245
Other Languages	39

For "less than very well".... use total for each language that is below "very well" using each age group, my total was 1,715 for those speaking less than very well for all age groups and languages shown.

p_dt_result

P19. AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER [67] - Universe: Population 5 years and over Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and count corrections see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

	Lake Charles City, Louisiana
Total:	66,558
5 to 17 years:	13,309
Speak only English	12,505
Speak Spanish:	213
Speak English "very well"	151
Speak English "well"	32
Speak English "not well"	30
Speak English "not at all"	0
Speak other Indo-European languages:	490
Speak English "very well"	440
Speak English "well"	39
Speak English "not well"	11
Speak English "not at all"	0
Speak Asian and Pacific Island languages:	42
Speak English "very well"	15
Speak English "well"	22
Speak English "not well"	5
Speak English "not at all"	0
Speak other languages:	59
Speak English "very well"	59
Speak English "well"	0
Speak English "not well"	0
Speak English "not at all"	0
18 to 64 years:	42,590
Speak only English	38,916
Speak Spanish:	944
Speak English "very well"	616
Speak English "well"	170
Speak English "not well"	125
Speak English "not at all"	33
Speak other Indo-European languages:	2,280

	Lake Charles City, Louisiana
Speak English "very well"	1,916
Speak English "well"	254
Speak English "not well"	110
Speak English "not at all"	0
Speak Asian and Pacific Island languages:	353
Speak English "very well"	153
Speak English "well"	106
Speak English "not well"	81
Speak English "not at all"	13
Speak other languages:	97
Speak English "very well"	70
Speak English "well"	16
Speak English "not well"	11
Speak English "not at all"	0
65 years and over:	10,659
Speak only English	8,638
Speak Spanish:	99
Speak English "very well"	85
Speak English "well"	14
Speak English "not well"	0
Speak English "not at all"	0
Speak other Indo-European languages:	1,877
Speak English "very well"	1,264
Speak English "well"	539
Speak English "not well"	63
Speak English "not at all"	11
Speak Asian and Pacific Island languages:	18
Speak English "very well"	0
Speak English "well"	11
Speak English "not well"	0
Speak English "not at all"	7
Speak other languages:	27
Speak English "very well"	15
Speak English "well"	12
Speak English "not well"	0
Speak English "not at all"	0

Translation assistance is very minimal.

Construction Projects

There were no construction projects during the reporting period.

Title VI Complaint Form

See Appendix G

Title VI Notification

The Title VI Notice has been placed in all City of Lake Charles facilities. This includes the Transit Station, on all buses, and covered bus stops. **See Appendix C**

If you have any further concerns or questions, please contact me at (337) 491-1465 or evincent@cityoflc.us.

**3. The nature and importance of the program, activity, or service provided
by City of Lake Charles to the LEP population**

While essential to the long-term livability and economic vitality of the area, long range transportation and growth management planning may not be as important of a service to LEP individuals as health care, employment, or financial assistance. However, any opportunity to increase public comment on long-range decision making is a worthwhile investment.

When an interpreter is needed, in person or on the telephone, first determine what language is required. If city staff cannot provide verbal interpretation and if a formal interpretation is required, staff shall use the assistance from 911, McNeese State University, or local Court Reporters possessing the needed language.

4. The resources available to the City of Lake Charles and overall costs to provide LEP assistance

The City has limited resources to pursue translation services; therefore, an ideal solution would be to find a low cost point of access for LEP individuals. This gives LEP individuals a way to find out about activities and provides a method for the City to determine the demand for translation services.

ACTION: The City of Lake Charles has established the following policy for providing information to individuals with Limited English Proficiency (LEP):

The City of Lake Charles is always seeking opportunities to increase opportunities for public comment on its activities, including policies, programs, and funding cycles. The City is particularly interested in increasing opportunities for historically undeserved populations to provide input regarding its planning activities. The results of the "four-factor analysis" showed that there is not a great need for translation services, but that it is a good time to find a starting place for providing access to individuals with limited English proficiency.

The City will obtain a Spanish translator from within its staff, the local university, through a volunteer, or a paid individual. **Notice of this service will be placed on the City's website.** Written procedures will be developed as needed to ensure consistent service delivery.

How to Identify an LEP Person who Needs Language Assistance

Below are tools to help identify persons who may need language assistance:

- Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings; and
- When City sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet, and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.

Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. If City staff cannot provide verbal interpretation and if a formal interpretation is required, staff shall use the assistance from 911, McNeese State University, or local Court Reporters possessing the needed language.

Staff Training

All City of Lake Charles staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the City staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities
- What language assistance services the City offers
- How to access an interpreter
- Documentation of language assistance requests
- How to handle a complaint

Providing Notice of Available Language Service to LEP Persons

- Post signs that language assistance is available on the website, City of Lake Charles meeting notices, and press releases.

Outreach Techniques

- If staff know that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, the City

will have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish.

- When running a general public meeting notice, staff should insert the clause:

Si necesita asistencia en español, por favor comuníquese departamento de desarrollo comunitario al 337.491.1440

- If notified in advance, Spanish speaking staff or a hired interpreter will be on hand at public meetings intended for gathering public input.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the City of Lake Charles will follow the Title VI Program update schedule for the LEP Plan.

Each update examines all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the city comprising the urbanized area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified City services? Are there other programs that should be included?
- Have the City's available resources, such as technology, staff, and financial costs changed?
- Has the City fulfilled the goals of the LEP Plan?
- Were any complaints received (and forwarded/referred to LADOTD)?

Dissemination of the City of Lake Charles Limited English Proficiency Plan

The City of Lake Charles will post the LEP Plan on its website at www.cityoflakecharles.com. Any person, including social service, nonprofit, law enforcement agencies, and other community members with internet access will be able to access the plan. For those without personal internet service, all parish libraries offer free internet access. Copies of the LEP Plan will be provided to

any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the City's Title VI Coordinator.