

# Limited English Proficiency Plan

**ALAMO AREA COUNCIL OF GOVERNMENTS BEXAR  
AREA AGENCY ON AGING  
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## INTRODUCTION

This ***Limited English Proficiency Plan*** has been prepared to address the **Alamo Area Council of Governments Bexar Area Agency on Aging's (AACOG/Bexar AAA)** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency 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 seq., 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 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 all **AACOG/BAAA** departments receiving federal grant funds.

### Plan Summary

The **AACOG/Bexar AAA** 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. As defined 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 **AACOG/Bexar AAA** used the 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 by the **AACOG/Bexar AAA**.
2. The frequency with which LEP persons come in contact with **AACOG/Bexar AAA** services.
3. The nature and importance of services provided by the **AACOG/Bexar AAA** to the LEP population.
4. The interpretation services available to the **AACOG/Bexar AAA** and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

### **The number or proportion of LEP persons in the service area who may be served or are likely to require AACOG/BAAA services**

The **AACOG/Bexar AAA** staff reviewed the 2009-2013 American Community Survey 5-Year Estimates, #B16001 and determined the following for Bexar County, Texas:

Total population of 1,622,139 in Bexar County. Spanish or Spanish Creole: Speak English less than "very well" 180,109 (11.1%); Chinese: Speak English less than "very well" 2,152 (0.13%); Korean: Speak English less than "very well" 1,961 (0.12%); Vietnamese: Speak English less

than “very well” 2,717 (0.17%); Tagalog: Speak English less than “very well” 1,399 (.09%); and Arabic: Speak English less than “very well” 1,563 (0.1%).

### **The frequency with which LEP persons come in contact with AACOG/Bexar AAA services**

The **AACOG/Bexar AAA** staff reviewed the frequency with which the Alamo Service Connection, Aging and Disability Resource Center (ASC/ADRC), department staff and front desk staff, have or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. A review of the calls received through the Alamo Service Connection for the period of October 2014 - September 2015 concluded the following:

Total transportation referrals:

Transportation referrals for callers with “other” language selected: 5

Transportation referrals for callers with “English” selected: 1,261

Transportation referrals for callers with “Spanish” selected: 42

Total calls: 17,264

English: 16,587 (96.1%)

Spanish: 658 (3.8%)

Other: 19 (0.1%)

The ASC/ADRC is staffed with Spanish translators to assist LEP persons with translation in this language. Also, the ASC/ADRC will work with an Interpreter agency to assist LEP callers that are not English or Spanish speaking.

### **The nature and importance of services provided by the AACOG/Bexar AAA to the LEP population**

The **AACOG/Bexar AAA** staff is most likely to encounter LEP individuals through office visits, phone ASC/ADRC conversations and notifications from internal department staff of impacts on service area services and attendance at meetings. As reported earlier, based on the ASC/ADRC call volume report, 96.1% of callers spoke English, and 3.8% of callers were Spanish speaking only.

### **The resources available to the AACOG/Bexar AAA and overall costs to provide LEP assistance.**

The **AACOG/Bexar AAA** reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through bilingual staff or a telephone interpreter line for which the **AACOG/Bexar AAA** would pay a fee. Our agency brochures are also available in Spanish.

## **LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to **AACOG/Bexar AAA** services. Language

assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the **AACOG/Bexar AAA** staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand on our agency website and notable areas throughout the facility.
- When the **AACOG/Bexar AAA** sponsors an informational meeting or event, staff greets participants as they arrive. By informally engaging participants in conversation, staff gauges each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.
- **AACOG/Bexar AAA** to the extent feasible, will assign English/Spanish speaking staff for community events, outreach activities, presentations to the general public and any other activity related to the program and services administered by our agency. Staff will greet participants as they arrive to sponsored events, and by informally engaging participants in conversation, will gauge each attendee's ability to speak and understand English. When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers and agendas will be printed in an alternative language based on the known LEP population. We will also conduct quarterly in-service training to all departmental staff and gather input as to the frequency of LEP persons contacting our agency to assist in identifying language assistance needs for future events and activities performed by our agency.

## **Language Assistance Measures**

**AACOG/BAAA** will strive to offer the following measures:

1. The **AACOG/Bexar AAA** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Interpreters for the Spanish language are available and will be provided within a reasonable time period.
  - Critical Documents will be translated (Application for Services/Complaint Form)
  - Work with community based organizations to inform LEP persons of the language assistance availability.
  - The Alamo Service Connection/ADRC's telephone voice line is delivered in both English and Spanish.

## **STAFF TRAINING**

The following training will be provided to all staff quarterly at their in-service meetings:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Maintain a complaint log with referenced complaints and resolutions if applicable.

## TRANSLATION OF DOCUMENTS

The **AACOG/Bexar AAA** is committed to translating pertinent documents, Title VI Complaint form, Agendas, Flyers and Brochures for which the target audience is expected to include LEP individuals. AACOG/Bexar AAA will also inform individuals of the availability of language interpretation at any of our agency events as noted below. Additionally, most of the brochures and flyers currently in circulation are available in both English and Spanish.

If the need arises for LEP outreach, the **AACOG/Bexar AAA** will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, agendas and brochures will be made available in an alternative language based on the known LEP population.
- **AACOG/Bexar AAA** will assess requests for translation of documents based on the possible impacts and known LEP population.

## MONITORING

**Monitoring and Updating the LEP Plan** - The **AACOG/Bexar AAA** will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data every three years or when it is evident that higher concentrations of LEP individuals are present in the **AACOG/Bexar AAA** service area.

## DISSEMINATION OF THE AACOG/Bexar AAA LEP PLAN

- **AACOG/Bexar AAA** will post signs in service area notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language LEP persons will understand and documents are available in that language upon request at **AACOG/Bexar AAA**.
- Post on **AACOG/Bexar AAA** website the LEP Plan and how to access language services.
- Send copy of press release to advocacy groups and other agencies serving LEP populations