

Central Mississippi Planning and Development District

Limited English Proficiency Plan

Effective: January 1, 2021

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INTRODUCTION

This Limited English Proficiency Plan has been prepared to address Central Mississippi Planning and Development District, Inc. (CMPDD) responsibilities as a recipient of federal financial assistance as they relate 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. 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.

PLAN SUMMARY

CMPDD 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 system 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 CMPDD.
2. The frequency with which LEP persons come in contact with CMPDD services.
3. The nature and importance of services provided by CMPDD to the LEP population.
4. The interpretation services available to CMPDD and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require CMPDD services.

CMPDD staff reviewed the 2010 U.S. Census data using the 2018 American Community Survey 5-Year Estimates Table and determined that 22,293 persons in the seven-county service area, 3.8% of the population speak a language other than English. Of those persons, 41.6% have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a 1.6% of the overall population aged 5 years and over in the CMPDD seven-county service area. Of those persons with limited English proficiency, 12,547 speak Spanish, 5,368 speak Indo-European languages and 4,378 speak other languages.

2. The frequency with which LEP persons come in contact with CMPDD services.

CMPDD staff reviewed the frequency with which its programs and office staff have, or could have, contact with LEP persons. This includes public involvement meetings, committee meetings, phone inquiries, and office visits. To date, CMPDD has had no requests for interpreters and no requests for translated program documents. CMPDD and office staff have had very little contact with LEP persons.

3. The nature and importance of services provided by the CMPDD to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for CMPDD. Of the majority of the population, 96.2% speak only English. As a result, there are few social, service, professional and leadership organizations within the CMPDD service area that focus on outreach to LEP individuals. The CMPDD programs and staff are most likely to encounter LEP individuals through office visits, phone conversations, committee meetings, and attendance at published program meetings.

4. The resources available to CMPDD and overall costs to provide LEP assistance.

CMPDD reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. Language translation, if needed, would be provided through a telephone/internet interpreter for which CMPDD would pay a fee, or through written translation when and if the budget allows.

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 CMPDD programs and 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.

Identifying 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 at initial points of contact.
- CMPDD office staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All CMPDD staff will be informally surveyed periodically on their experience and frequency concerning any contacts with LEP persons during the previous year.
- Examine records to see if requests for language assistance have been received in the past to determine whether language assistance may be needed at future meetings.
- Translation may not be able to be provided at every event but can easily be identified for the need for future events.

Language Assistance Measures - Although there is a very low percentage in the CMPDD service area of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. CMPDD 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:
 - i. Volunteers or paid interpreters may be provided within a reasonable time period as the budget allows.
 - ii. Language interpretation may be accessed for languages through a telephone interpretation service/internet.

STAFF TRAINING

The following training will be provided to all applicable staff:

- Information on the Title VI Policy and LEP responsibilities; annually.
- Description of language assistance services offered to the public, in person, by telephone, and on website.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.

TRANSLATION OF DOCUMENTS

- CMPDD evaluated the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.
- Due to the very small local LEP population, CMPDD does not have a formal outreach procedure in place. However, when and if the need arises for LEP outreach, CMPDD will consider the following options:

When staff prepares a document, advertisement or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan- CMPDD will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in the CMPDD service area. Updates will include:


- Determination of the current LEP population in the service area.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- 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 CMPDD's financial resources are sufficient to fund language assistance resources needed.
- Determine whether CMPDD fully complies with the goals of this LEP Plan.

DISSEMINATION OF CMPDD LEP PLAN

Post notice on CMPDD website notifying LEP persons of the LEP Plan and how to access language services.

ACCEPTANCE AND SIGNATURE

Accepted and approved on behalf of Central Mississippi Planning and Development District, Inc.



Mike Monk, CEO

1/4/2021
Date