

Limited English Proficiency Plan
City of Waterloo, Iowa
Community Development

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Table of Contents

I.	Introduction.....	Page 3
II.	Meaningful Access: Four Factor Analysis	Page 4
III.	Language Assistance.....	Page 6
IV.	Staff Training.....	Page 7
V.	Translation of Documents.....	Page 7
VI.	Monitoring.....	Page 7
VII.	Dissemination of Community Development’s LEP Plan.....	Page 8

I. INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the City of Waterloo Community Development Department's 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 to ensure compliance with HUD's guidance and Title VI of the Civil Rights Act of 1964, and its implementing regulations. Under HUD's guidance, Community Development must take reasonable steps to ensure meaningful access to their programs and activities by persons with Limited English Proficiency (LEP).

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 Community Development.

Plan Summary

The Community Development Department 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 Community Development Department used HUD's four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the programs;
2. The frequency with which LEP persons come in contact with Community Development programs;
3. The nature and importance of the programs and services provided by Community Development to the LEP population;
4. The resources available to Community Development and overall cost to provide LEP assistance.

SAFE HARBORS

In accordance with HUD Safe Harbors for LEP, Community Development will translate written documents for groups that are at least 5% of the population eligible or 1,000 persons, whichever is less.

If there are fewer than 50 persons in a language group that reaches the 5% trigger above, Community Development will not translate the vital written materials, but provides written notice in the primary language of the LEP group of the right to receive competent oral interpretation of those written materials, free of cost.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the programs.

The Community Development staff reviewed the 2010-2014 American Community Survey 5-year estimates and determined that 5,973 persons in Waterloo (9.4% of the population) speak a language other than English. Of those 5,973 persons 2,542 (3.7% of the population) have limited English proficiency; that is, they speak English “less than very well”. In Waterloo, of those persons with limited English proficiency, 1,018 (1.4%) speak Spanish, and 1,524 (2.2%) speak European, Slavic, Arabic, African, Asian and Pacific Island languages. A review of the rehabilitation waiting list and clients that applied for our emergency repairs, ramp, and down payment assistance programs over the past two years (2014-2016) showed five Hispanic households. This does not meet the threshold described above. Oral Interpretation Services are available for clients. However, all of our clients have provided their own translator with whom they are comfortable sharing personal information.

Speak English less than very well: (source- U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates for Waterloo, Iowa)

Language	Population	Language	Population	Language	Population
Spanish or Spanish Creole	1,018	German	47	Serbo-Croatian	1,162
Gujarati	27	Urdu	5	Japanese	10
Korean	45	Thai	5	Laotian	29
Vietnamese	130	Other Asian	11	Arabic	43
African	10				

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

The Community Development staff reviewed the frequency with which staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. Over the past two years, Community Development has had no requests for interpreters and no requests for translated program documents.

- Language Identification Cards will be used as necessary to determine a client's language needs.
- The following statement will be added to public meeting and event notices: "For accommodations, materials in accessible formats, foreign language interpreters and/or materials in a language other than English, please contact Community Development at 319-291-4429 at least 5 business days in advance."
- As Community Development documents are reprinted the following statement will be added in English and Spanish:
"If you require an oral interpretation in a language other than English, please call 319-291-4429."
"Si require una interpretacion oral en um idioma que no sea ingles, por favor llame al 319-291-4429."

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

Housing plays a critical role in maintaining quality of life. Community Development is committed to ensure access to safe, sanitary and affordable housing for our eligible clients. Outreach throughout the community helps to ensure awareness of our programs. The majority of the City's population- 90.1% speak only English. We maintain a working relationship with the University of Northern Iowa and Waterloo Schools that have interpreters for needed languages. Community Development staff are most likely to encounter LEP individuals through office visits and phone conversations. Upon client request, Community Development will provide oral interpreters using bi-lingual employees or qualified contract interpreters. To date, all LEP individuals have provided their own interpreter-a child or friend.

4. The resources available to Community Development, and overall cost to provide LEP assistance.

Waterloo Community Development 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 the University of Northern Iowa or Waterloo Schools interpreters for which Community Development would pay a fee. We allow LEP clients to use an interpreter of their own choosing in place of our assistance.

III. 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 Community Development 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 Community Development 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.
- All Community Development staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When Community Development conducts a Public Hearing, an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge 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.

Language Assistance Measures-Although there is a small percentage in Waterloo of eligible LEP households, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. The Community Development 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:
 - Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.
 - Language interpretation will be accessed for all other languages through the University of Northern Iowa or Waterloo Schools.

IV. STAFF TRAINING

The following training will be provided to all staff:

- 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.

All contractors, subcontractors and subrecipients performing work for or receiving federal funds for Community Development projects will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

- Community Development weighed 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 cost to have any documents translated.
- Due to the relatively small eligible local LEP population, Community Development does not have a formal outreach procedure in place in 2016. Translation resources have been identified. When and if the need arises for LEP outreach, Community Development will consider the following option:

-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, and agendas will be printed in an alternative language based on the known LEP population.

VI. MONITORING AND UPDATING THE LEP PLAN

Community Development will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every two years using American Fact Finder for census information, or when it is clear that higher concentrations of LEP individuals are present in the City of Waterloo. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.

- 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 Community Development's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Community Development fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF COMMUNITY DEVELOPMENT'S LEP PLAN

The LEP Plan will be on the Community Development's website page and provided to anyone requesting the information.