

# **Chester County Department of Community Development**

## **Language Access Plan for Limited English Proficient Persons**

### **Article I. Purpose**

The purpose of this document is to establish a meaningful plan for the Chester County Department of Community Development (DCD) to follow when providing services and interacting with individuals who have Limited English Proficiency (LEP) in compliance with Title VI of the Civil Rights Act of 1964. This law stipulates that no person shall be subjected to discrimination based on race, color or national origin under any program or activity that receives Federal financial assistance.

### **Article II. General Policy**

Chester County and the Department of Community Development (DCD) recognizes that the residents eligible for services includes those who are Limited English Proficient (LEP), and it is the policy of DCD to ensure access to LEP individuals to obtain services and communicate effectively.

DCD, rather than the LEP individual, bears the responsibility for providing language appropriate services. Staff has the specific duty to identify and record language needs, and no staff may suggest or require that an LEP consumer provide an interpreter in order to receive services. Minor children are excluded from acting as interpreters, and use of informal interpreters such as family, friends of the person seeking services, or other consumers must be discouraged.

### **Article III. Limited English Proficient Criteria**

It is DCD policy to grant services and programs to every person regardless of whether that person has a limited ability to speak, understand, read, or write English. In developing this language assistance plan for LEP persons, DCD has utilized the Four Factor Analysis:

- The number or proportion of LEP persons in the service area
- The frequency with which LEP persons access services
- The nature and importance of the programs, activities and services provided
- The resources available to Department of Community Development and the cost to provide language services

An LEP person is one whose proficiency in speaking, reading, writing, or understanding English is such that it would deny or limit meaningful access to programs and services provided by DCD if language assistance were not provided. This Analysis determines what steps are needed to ensure access to the planning processes, services, and written materials provided through various federally funded programs.

## **Article IV. Definitions**

Limited English Proficiency—Individuals that do not speak English as their primary language and who have limited ability to read, speak, write, or understand English may have Limited English Proficiency, or “LEP”. These individuals may be entitled to language assistance with respect to certain types of services, benefits, or encounters.

Language Access Plan—Guiding document that ensures access to programs is provided to individuals that may have Limited English Proficiency and that the resources to do so are available.

Four-Factor Analysis—A component of a Language Access Plan. The Analysis sets forth the steps an organization should take to determine how to provide meaningful access for Limited English Proficient individuals so that their federally funded programs meet the requirements of the law.

Translation—Services are a more deliberate process, where written text is translated from the source language, in this case English, to other languages.

Interpretation—Language interpretation services provided real time, oral interpretation from one language to another. This is done with an interpreter orally translating a conversation or meeting live, and in-person.

## **Article V. Four Factor Analysis**

### *1. Number of LEP Persons Served*

The American Community Survey (ACS) defines LEP persons as those living in the United States, regardless of whether they are a citizen, who speak a language other than English in their homes and if they speak English “very well” or “less than very well”. Those individuals that speak English “less than very well” are classified as LEP persons. Persons who do not speak, read, write or understand English as their primary language may be entitled to language assistance through other means such as interpretation or translation so that they may receive access to services and programs.

The U.S. Department of Housing and Urban Development (HUD) has established “safe harbor” guidelines for written materials which declares that vital documents should be translated in the language(s) of any language group with 1,000 or 5% (whichever is less) of the eligible populace.

According to 2015 ACS estimates, Chester County has a population of 486,714 people ages five (5) years and over, of which 59,595 (12.2%) speak a language other than English at home. There are three language groups that the ACS has identified in Chester County: Spanish, Indo-European, and Asian and Pacific Islander.

Spanish is the second most commonly spoken language in Chester County with 12,518 (2.6%) of the residents speaking English “less than very well.” There are 4,363 (0.9%) Asian and Pacific Islander residents that speak English “less than

very well,” while 4,182 (0.9%) Indo-European individuals that speak English “less than very well.”

Spanish is the most frequently encountered of these languages; according to HUD’s safe harbor guidelines, DCD and its services providers will have readily available critical documents translated in that language for Chester County Residents.

## 2. *LEP Persons’ Frequency of Contact*

DCD has reviewed the frequency with which staff and providers have, or could have, contact with LEP persons. This includes documenting phone inquiries, office visits, public meetings, and other interactions.

DCD has several points of contact with residents who inquire about services and assistance:

- Office walk-ins—Members of the public will, on rare occasions, walk into DCD during business hours to inquire information about services. Bilingual Spanish staff is available to interpret; in cases where the bilingual speaking staff is unavailable, or a different language is spoken, “I speak” language cards are available at the front desk.
- Phone calls—DCD receives frequent calls during business hours to inquire information about services. If a caller with LEP requires assistance, the call will be transferred to bilingual staff or use telephonic interpretation.
- Public meetings—DCD conducts public meetings during which Chester County citizens are invited to attend to learn more about and comment upon agency initiatives. DCD will provide interpretation upon request, to the best of its ability.

DCD encounters few LEP persons. Of those LEP individuals encountered, most individuals were requesting information about housing and workforce resources.

## 3. *Nature and Importance of the Program, Activity, or Service*

Access to safe, decent, and affordable housing and full employment potential are vital to any person living in Chester County. The services and programs provided by DCD continue to be important as they relate to these needs.

DCD offers several housing programs by contracting with area non-profit organizations, including housing rehabilitation and senior home maintenance programs, and a first time homebuyer program. Additionally, staff can provide information and referrals to residents seeking information about fair housing issues.

The Chester County Workforce Development Board (WDB) is staffed by DCD, which also acts as the fiscal agent. The WDB funds a variety of job training,

education, and employment initiatives for job seekers at the PA CareerLink® - Chester County and the United Way Financial Stability Center.

These programs have varying eligibility thresholds, but many target assistance to low- and moderate-income individuals and households. Therefore, DCD seeks to communicate effectively with all persons making inquiries regarding available assistance.

4. *Resources available*

DCD has the following resources available to them enabling the organization to reach out to LEP persons in Chester County at a low/reasonable cost.

*Documents*—Program documents distributed by DCD that are also available in Spanish include the following:

<p>Department of Community Development 610-344-6900</p>	<ul style="list-style-type: none"> <li>• Fair Housing Equal Opportunity for All Equidad en la Vivienda Igualdad de Oportunidades para Todos</li> <li>• Are you a Victim of Housing Discrimination? ¿Es Usted una Víctima de la Discriminación en la Vivienda?</li> <li>• Experiencing Homelessness? (2-1-1) ¿Estás experimentando la falta de vivienda? (2-1-1)</li> </ul>
<p>PA Career Link® - Chester County 610-280-1010</p>	<ul style="list-style-type: none"> <li>• Job seeker enrollment forms</li> <li>• EEO posters</li> <li>• Unemployment compensation call center information</li> <li>• Consumer satisfaction surveys</li> <li>• Civil rights form</li> <li>• Grievance procedures</li> </ul>
<p>Good Neighbors 610-444-1860</p>	<ul style="list-style-type: none"> <li>• Good Neighbors Home Repair Buenos Vecinos Reparación para Hogares</li> </ul>
<p>Housing Partnership of Chester County 610-518-1522</p>	<ul style="list-style-type: none"> <li>• First Time Home Buyer Program Programa de Compradore de Casa por Primera Ves</li> <li>• Credit Counseling Program Consejería de Crédito y Presupuesto</li> <li>• Housing Rehabilitation Program Programa de Rehabilitación de Vivienda</li> <li>• Home Modification Program Programa de Modificación de Hogar</li> <li>• Senior Home Maintenance Program Programa de Mantenimiento de Hogar para Acianos</li> </ul>
<p>Rover Community Transportation 484-696-3854</p>	<ul style="list-style-type: none"> <li>• How to Ride Rover (in English and Spanish)</li> </ul>

*Google Translate on DCD and WDB websites*—The County of Chester’s website features Google Translate on its pages so that visitors can view the content posted on the DCD page ([www.chesco.org/ccdcd](http://www.chesco.org/ccdcd)) and the WDB page ([www.chesco.org/wib](http://www.chesco.org/wib)) in their language of choice.

*ReferWeb*—Chester County’s *ReferWeb* Resource Directory ([www.referweb.net/chesco](http://www.referweb.net/chesco)) includes a variety of health and human services resources, including information on housing and shelter services. This site also features Spanish translation via Google Translate.

*JobGateway*—Provided by the Pennsylvania Department of Labor and Industry, JobGateway ([www.jobgateway.pa.gov](http://www.jobgateway.pa.gov)) serves job seekers and employers by posting job openings and allowing users to post their resumes. The entire site translates into Spanish.

*Interpreter Services*—DCD states in public meeting announcements that interpretive services are available upon request. It also employs two bilingual staff that may be available to assist LEP consumers that speak Spanish.

The County of Chester has a contractual relationship with Propio Language Services, which offers translation services over the telephone, video voice-overs and document translation. This service supports over 200 languages and has telephone interpreters available 24 hours a day, every day of the year; DCD can utilize this service to call and access an interpreter when the need arises at no cost to consumers.

*I Speak Cards*—DCD may need to assist individuals requesting information but that are unable to communicate in English. Such LEP consumers will be asked if they need assistance by using language identification cards to identify their language.

*PA CareerLink® -Chester County*—The PA CareerLink® - Chester County provides many residents of Chester County with employment opportunities. This is a cooperative program in which job seekers and employers share access to a wide array of job training, education and employment services. Documents in the CareerLink are available for translation. There are four bilingual staff members on site to provide interpretive services in accordance with its own Language Access Plan (LAP).

*Staff Training*—DCD will provide training on LEP awareness and required assistance actions under the Language Assistance Plan for employees. This includes:

- Background of the LAP
- DCD obligation to provide meaningful access to individuals with LEP
- Review of procedures related to the LAP

- Ongoing updates related to LEP analysis

*Monitoring and Updating the Plan*—Every five years, as part of developing the DCD Consolidated Plan and Citizen Participation Plan, the LAP will be reviewed and updated. The review will assess:

- Tracking the different types of language assistance provided and different types of requests DCD receives
- Review of Chester County demographics to ensure language assistance needs are met
- Review of any issues or problems related to serving LEP persons which may have emerged during the past five years
- Ensure compatibility with citizen participation plan and affirmative marketing plan
- Identification of any recommended actions to provide more responsive and effective language services