

# **Limited English Proficiency (LEP) Plan**

## 1. INTRODUCTION AND BACKGROUND

## a. Purpose of Limited English Proficiency (LEP) Plan

The purpose of the City of Willard LEP plan is: to (i) enhance awareness of the needs of methods to ensure that LEP persons have meaningful access to federally assisted programs; (ii) ensure implementation of language access; and (iii) comply with their acquirements of Title VI of the Civil Rights Act of 1964 and implementing regulations (Title VI), in a consistent and effective manner across the programs, services, and activities.

The City of Willard LEP Plan is designed to assist The City of Willard staff by providing guidance on Translation, Interpretation, and outreach services for LEP persons seeking access to The City of Willard's programs, services or activities, consistent with Title VI.

All employees are to ensure that the public is treated with dignity and respect, identify language needs for The City of Willard customers, and utilize Bilingual resources to assist individuals, when needed.

## **b.** Policy Statement

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The City of Willard will ensure that no person on the grounds of race, color, religion, ancestry, ethnic group identification, creed, national origin, creed, sex (including the actual or perceived sexual orientation or gender identity), disability, mental disability, physical disability, medical condition, genetic information, marital status, veteran's status, or age, is excluded from participation in, denied the benefits of, otherwise subjected to discrimination, or retaliated against under any program, service or activity it administers. The City of Willard is committed

to taking reasonable steps to provide timely and meaningful access for LEP Persons coming into contact with The City of Willard's programs, services, and activities. The City of Willard will provide free language assistance to LEP Persons and inform members of the public that language assistance services are available free of charge to LEP Persons.

The Cityof Willard will provide, at no cost, appropriate auxiliary aids and services, including but not limited to, qualified interpreters to individuals who are deaf or hard of hearing, and to other individuals as necessary to ensure effective communication and the equal opportunity to participate fully in the benefits, activities, programs and services provided by The City of Willard in the timely manner and in such a way to protect the privacy and independence of the individual.

#### c. Who is Limited English Proficient?

LEP Persons are individuals who do not speak English as their Primary Language and have a limited ability to read, write, speak, or understand English. LEP Persons include those that speak English less than very well, not well, or not at all, as considered by the US Census Bureau. People can self-identify as LEP Persons. These individuals may be entitled to language assistance in a particular program, service, or activity.

#### d. Public Dissemination of Title VI Information

The City of Willard will inform LEP Persons of the availability of language access services, free of charge, by providing written notice conspicuously in areas of its facilities and on its websites and in the most prevalent language spoken by LEP Persons in the communities of The City of Willard.

The notices will be posted prominently and will be readily visible to the public. City of Willard handbooks, manuals and pamphlets will describe the requirements of federal nondiscrimination laws. Including Title VI and the ability of language assistance, and federal nondiscrimination compliant procedures. Advertisements will state that The City of Willard administers equal opportunity programs and indicate that federal law prohibits discrimination. The following is the notice or may be used by the City of Willard:

It is the policy of the City of Willard to ensure full compliance with federal non-discrimination laws in all programs and activities. The City of Willard will not discriminate based on race, color, national origin, religion, ancestry, ethnic group identification, creed, sex (including actual or perceived sexual orientation or gender identity), disability, mental disability, physical disability, medical condition, genetic information, marital status, veteran status, or age,

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and any City of Willard programs, services, or activities. For more information, contact Dona Slater, City Clerk, Non-Discrimination Coordinator, City of Willard, P. O. Box 187, 224 W. Jackson St., Willard, MO 65781. Telephone:417-742-5802, <u>clerk@cityofwillard.org.</u>

## SELF ASSESSMENT AND LANGUAGE ACCESS PLAN

The City of Willard will take reasonable steps to ensure LEP Persons have meaningful access to the information and services it provides.

In planning to provide meaningful access to LEP Persons, the City of Willard, through the Non-Discrimination Coordinator, will annually conduct a self-assessment and update the language access plan considering four factors. With the goal of ensuring coordinated, cost effective, delivery of high-quality language assistance services:

#### a. Demographics

The City of Willard will annually assess the number or proportion of LEP Persons from a particular language group served or encountered in the surrounding community area.

The City of Willard will consider variety of sources for demographic information, including the United States Census Bureau.

For 2023, the City of Willard has determined that the most prevalent language spoken by LEP Persons in the community that The City of Willard serves are Spanish (2.2%) and other Indo-European languages (3%).

## b. Frequency of LEP Contact

The City of Willard will gather and evaluate data on how often various language groups come into contact with the City of Willard and take into consideration how The City of Willard programs, activities, and services affect those needs.

## c. Nature and Importance of the Services Provided

The City of Willard will review the nature and importance of The City of Willard programs, activities, programs and services provided to that population.

#### d. Resources

The City of Willard will evaluate the resources available at the City of Willard and the cost of language services and will endeavor to plan for language services sufficient to provide meaningful access to its programs, services, and activities in a cost-effective manner.

# 2. LANGUAGE ASSISTANCE

The City of Willard will take any reasonable steps necessary to provide LEP Persons meaningful access to all City of Willard services, programs, or activities. Language assistance will be provided for LEP Persons through the translation documents as well through oral interpretation in-person and or by telephone.

Language services should be provided at a time and place that avoids the effect of denying meaningful access to the services or benefits of the program, service, or activity. However, in some situations, it may be reasonable to ask the LEP person to return at a specified date and time to allow The City of Willard to arrange for Interpreter or Translator services.

Interpreter and Translation services are available to staff by contacting The City of Willard Non-Discrimination Coordinator:

Dona Slater, City Clerk Non-Discrimination Coordinator City of Willard P. O. Box 187 224 W. Jackson St. Willard, MO 65781 Telephone:417-742-5302 clerk@cityofwillard.org

## a. Outreach

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The City of Willard will include LEP Persons and LEP Communities in its public outreach and engagement strategies and plans protecting steps to target outreach and engagement efforts to reach LEP Persons and Communities where appropriate.

## b. Providing Notice to LEP Persons

The City of Willard will provide information about free language services by:

- Posting signs in English and Spanish about federal nondiscrimination laws, including title. VI, and the availability of free language assistance services in high traffic, areas of the public is likely to read them.
- Posting notices on the City of Willard's website in English and Spanish about federal nondiscrimination laws, including Title VI, and the availability of free language assistance services.
- Stating in outreach materials that language services are available.
- Working with community-based organizations to inform LEP Persons of the language assistance availability.
- Providing presentations and/or notices at community organizations for important events or community involvement.

## c. Oral Interpretation

The City of Willard currently does not employ bilingual staff.

LEP Persons are not obligated to provide their own interpreter, although some may prefer to do so, after being informed of the availability of free language assistance.

The City of Willard will ensure that it uses qualified interpreters.

The city of Willard utilizes Language Access Multicultural People (LAMP) for in person interpretation. They may be reached at 877-240-6398.

## d. Translation of Written Documents

The City of Willard will arrange for Translation of Vital Written Documents when necessary to ensure meaningful access by LEP Persons.

Vital Written Documents are paper or electronic written material that contains information that is critical for accessing The City of Willard's programs, services, or activities; is directly and substantially related to public safety; or is required by law.

The City of Willard will ensure that translators for written documents are qualified. The City of Willard utilizes Language Access Multicultural People (LAMP) for translation of written documents. They may be reached at 877-240-6398.

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## 3. HOW WE ASSESS LEP PERSONS

## a. Interaction with Walk-In LEP Persons

- i. The City of Willard will take reasonable steps to provide language assistance as needed for in person contact with LEP Persons. Language identification cards invite LEP Persons to the find the language needs to City of Willard staff. The City of Willard will disseminate these cards to all City of Willard employees to be used with the walk-in LEP Persons procedures below.
  - The City of Willard will attempt to communicate. In English first to determine if the individual can understand English sufficiently to be fully understood.
  - If the individual cannot understand or effective to communicate in English, The City of Willard employee will determine the language he or she is speaking.
  - If The City of Willard employ cannot recognize the language the individual is speaking, show him/her the language identification card so the LEP Person can point to his/ her language.

## b. Phone calls from LEP Persons

- i. The City of Willard will take steps to respond in a timely and effective manner to LEP persons who call seeking information or assistance. The City of Willard will utilize the following steps assisting phone-in LEP Persons:
  - 1. The City of Willard employee will attempt to communicate English first to determine if the individual can understand English sufficiently to be fully understood.
  - 2. If the individual cannot understand or effectively communicate in English, The City of Willard employee will contact the City of Willard Non-Discrimination Coordinator to arrange for interpretation services.
  - 3. The City of Willard employee will make every effort to give the LEP person the same level of service as English-speaking customer.



## c. Advance Requests for In-Person Interpretation

The City of Willard is committed to using Qualified Interpreters upon advance requests for in person appointments and/or public meetings. In general, The City of Willard would ask the LEP Person to give five (5) business days advance notice of a request for Interpretation. However, such advanced notice is not received, The City of Willard employees will attempt to arrange Interpretation. through The City of Willard Non-Discrimination Coordinator.

## d. Written Translation Services

When translation of a document is requested by LEP Person into a language in which translation is not already been provided, The City of Willard staff will:

- Attempt to determine the LEP Person's primary language, using "I Speak" cards.
- Contact the City of Willards Non-Discrimination Coordinator to arrange timely translation of the document into the requested language.
- If the document cannot be translated into the requested language on timely basis, The City of Willard's, Non-Discrimination Coordinator will take reasonable steps to provide Sight Translation or other meaningful communication of the document as appropriate.

When the City of Willard writes a document to a particular LEP Person:

- This City of Willard staff will draft the document in English.
- The City of Willard staff will identify the Primary Language of the LEP Person.
- The City of Willard staff will request the City of Willard's Non-Discrimination Coordinator to arrange timely translation of the document into the requested language.
- The City of Willard staff will send the document in both English and as translated to the LEP Person and will retain copies of both versions.
- The City of Willard staff will make every effort to give the LEP Person the same level of service as an English-speaking customer.



## 4. TECHNICAL ASSISTANCE AND TRAINING

## a. Training

The City of Willard will provide employees with annual training on Title VI, The City of Willard's language access obligations, how to obtain language assistance services, how to work with Qualified Interpreters and Translators, and how to properly handle a complaint alleging discrimination under the federal nondiscrimination laws, including Title VI.

All managers and supervisors will be trained, even if they do not regularly interact with LEP Persons, to ensure they are fully aware of and understand what LEP is, so they can reinforce its importance and ensure its implementation by staff.

#### b. Technical Assistance

The City of Willard's Civil Rights Compliance Coordinator is responsible for providing managers and staff with technical assistance. This includes advising about LEP requirements and implementation and assisting and developing program area procedures to ensure compliance.

#### 5. MONITORING AND ASSESSMENT

Managers and supervisors are responsible for ensuring that meaningful services to LEP persons are provided in their respective areas. The City of Willards LEP plan must be incorporated by reference into the appropriate program procedure manuals in order to ensure employees are aware of their obligations for compliance.

The City of Willard's Non-Discrimination Coordinator will monitor programs on an ongoing basis to ensure LEP requirements are fulfilled and report annually on the accomplishments related to LEP activities The City of Willard leadership and as required to federal agencies.

The City of Willard's Non-Discrimination Coordinator will maintain documentation regarding LEP Persons, including:

- Nature of the service (walk in, telephone or translation of a document.
- Means for which assistance was rendered (The City of Willard staff or interpretive/ translation services)
- Language translated or interpreted.
- Race and national origin of LEP Person.
- Subject matter or services rendered.
- Date, time (start to finish).

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## 6. CONCLUSION

Providing meaningful access to LEP Persons to The City of Willard's programs, services, and activities is important effort that will help The City of Willard to achieve its mission of providing equitable and timely services to all persons.

