

# Title VI Language Assistance Plan

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A plan for ensuring access to Community Development Division planning efforts, programs and services by persons with Limited English Proficiency

## ABOUT THE COMMUNITY DEVELOPMENT DIVISION (CDD)

The City of Colorado Springs Community Development Division (CDD) administers federal grant funds received from the U.S. Department of Housing & Urban Development (HUD). Annually, the City receives approximately \$4.2M in grant funds through the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships (HOME) program, and the Emergency Solutions Grant (ESG) program. The funds are used to carry out a variety of activities, including neighborhood planning, public services that work to prevent and end homelessness, investments in State and local partnerships developing affordable housing, coordination with other City Departments on improvements to public facilities and infrastructure, and the administration of various owner-occupied housing rehabilitation programs intended to improve the safety and well-being of low- to moderate-income households.

## PURPOSE OF THE LANGUAGE ASSISTANCE PLAN (LAP)

On October 1, 2011, the City of Colorado Springs adopted a Limited English Proficiency (LEP) Policy and related LEP Plan Guidelines. The policy states that the City will “...provide timely meaningful access for Limited English Proficiency persons to City programs and activities.” And that the City “...will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and opportunity to participate in our services, activities, and programs.” The LEP policy and related plan guidelines were adopted in compliance with **24 CFR Part 1, *Nondiscrimination in Federally-Assisted Programs of the Department of Housing and Urban Development, Effectuation of Title VI of the Civil Rights Act of 1964.***

In keeping with the City’s LEP policy and guidelines, the Community Development Division has created a Division specific Language Assistance Plan (LAP) to provide language assistance services for community members seeking access to CDD’s programs and services. The plan includes a ‘Four-Factor Needs Assessment’ consistent with federal guidelines, an explanation of the steps being put into place to address the needs of LEP persons, and an outline of future steps planned to ensure ongoing, meaningful access for LEP persons to CDD’s planning efforts, programs and services.

## DEFINITIONS

The following definitions apply to this plan:

- **LEP persons:** persons who are not proficient in the English language.
- **Language Assistance Plan (LAP):** a plan for providing oral and written Language Assistance Services to LEP persons so that they can communicate effectively with staff, receive meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Community Development Division.
- **Primary language:** the language in which an individual is most effectively able to communicate.
- **Language Assistance Services:** the provision of interpretation and/or translation

services to LEP persons.

- **Interpretation:** the act of listening to a communication in one language and orally converting it to another language, while retaining the same meaning.
- **Translation:** the replacement of written text from one language into an equivalent written text in another language.
- **Bilingual:** the ability to speak fluently and communicate directly and accurately in both English and another language.

## ANALYSIS

CDD’s programs are offered City-wide with an emphasis on activities that benefit low- to moderate-income persons. According to a Housing Needs Assessment prepared in October of 2014, a correlation exists between concentrations of ethnic populations, income level, and English proficiency. LEP persons in the City of Colorado Springs are more likely to be low- to moderate-income. The following four factors were considered in assessing the need for CDD to provide meaningful access for LEP persons to its programs and services:

1) Number or proportion of LEP persons eligible or likely to be served or encountered:

Limited English Proficiency	Colorado Springs (170,273 Households)		El Paso County (240,154 Households)		Colorado (1,998,314 Households)	
	Estimate %	Estimated Households	Estimate %	Estimated Households	Estimate %	Estimated Households
All households	2.5%	4,255	2.1%	5,043	3.1%	61,948
Households speaking --						
Spanish	18.3%	779	16.0%	807	18.5%	11,460
Other Indo-European languages	8.3%	353	6.6%	333	9.7%	6,009
Asian and Pacific Island languages	17.4%	740	16.5%	832	22.3%	13,814
Other languages	24.2%	1,030	20.9%	1,054	22.7%	14,062
Data Source: 2010-2014 American Community Survey						

**The Census Defines this Dataset as:** A "limited English speaking household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulty with English. By definition, English-only households cannot belong to this group. Previous Census Bureau data products have referred to these households as "linguistically isolated" and "Households in which no one 14 and over speaks English only or speaks a language other than English at home and speaks English 'very well'." This table is directly comparable to tables from earlier years that used these labels. (factfinder.census.gov)

2) Frequency with which LEP persons come in contact with the program:

Across City divisions, the frequency of encounters with LEP persons varies greatly. Typically, the Community Development Division has less than 2 encounters per year. The most common need for language assistance is in Spanish. As a result, CDD provides public notices in both English and Spanish and is currently working on making a list of vital documents available in other languages on request.

3) Nature and importance of the program to peoples' lives:

Programs administered by the Community Development Division generally must benefit low- to moderate-income persons. Program delivery is accomplished in a variety of ways; through partnerships with agencies serving the homeless, the disabled, the elderly, and victims of domestic abuse; with in-house staff interacting directly with community residents; and through collaborative work with other City Departments such as Parks, Transit, and Public Works. CDD's programs result in both individual benefits to low- to moderate-income households and dispersed area benefits to struggling neighborhoods.

4) Resources available and costs to consider:

City resources are of concern in providing appropriate levels of service to LEP persons. Some City Divisions use translation services or interpreters on a daily basis while other Divisions may go months or years without interacting with LEP persons. As noted above, CDD's interactions with LEP persons are infrequent. As a result, CDD intends to utilize available City resources on an as-needed basis.

Language Line Services, Inc. is the primary contracted service for the City of Colorado Springs and its Enterprises. The service offers over-the-phone interpreting, translation of documents, websites, and multimedia in over 200 languages.

GlobeLink offers the City and its Enterprises in-person interpretation services. They can also provide official document translation when needed.

Google Translate is a website plugin that provides instant informal translation of documents. The plug-in is available on the City's website. <http://translate.google.com> and <http://freetranslation.com> can also be used for informal translation services.

City Employees can sometimes be used to interpret or translate. City Human Resources keeps a voluntary list of bi-lingual employees.

LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and the use of such a person as an interpreter is appropriate under the circumstances. Extra caution should be used when issues of confidentiality, privacy, or conflict of interest are involved.

## LANGUAGE ASSISTANCE PLAN IMPLEMENTATION

### PROCEDURES

- 1) Identify the language – Staff will identify the communication needs of the LEP person. Bilingual staff members are recognized as valuable to providing meaningful access for LEP persons to City programs and activities. Bilingual staff should be fluent in order to provide effective communication. The longer or the more complex the discussion/need, the more important it is for the staff member to be truly fluent.

If necessary, staff will use a language identification card or posters to determine the language spoken by the LEP person. The materials are available at [www.lep.gov](http://www.lep.gov) for public use or can be obtained from the City Communications Department. As mentioned above, City staff who are fluent in another language are identified on the City intranet.

- 2) Obtaining an interpreter – Staff will consider the following resources and make an appropriate decision based on the client’s need:
  - a. Use of City staff or free language translation if e-mail communication;
  - b. Use of City staff, family member/friend (if requested by client and no apparent conflict of interest) or Language Line when client contact occurs with little or no pre-notice;
  - c. Use of City staff, family member/friend (if requested by client and no apparent conflict of interest), Language Line, or Globelink for in-person interpreting during a pre-arranged appointment;
  - d. Professional interpretation of program documents by either qualified City staff, or more likely, through either Language Line or Globelink. There may be other language assistance needs that require a case by case determination suitable to the circumstances. The use of an in-person interpreter through Globelink must first be approved by a department supervisor.
- 3) Documentation – Staff must document any of the above language assistance services.

## SUMMARY OF LANGUAGE ASSISTANCE EFFORTS

The primary focus of CDD’s language assistance efforts are directed toward Spanish-speaking persons. To ensure access to planning efforts, programs and services offered by the Division, CDD has initiated the following efforts:

- 1) Public notices appear in both English and Spanish. Other vital documents are available in translation on request.
- 2) CDD job postings include a preference for bilingual applicants.

## ONGOING EFFORTS TO IDENTIFY AND ENSURE ACCESS FOR LEP POPULATIONS

As part of an ongoing commitment to bridging gaps in communication with LEP persons, CDD will carry out the following activities:

- 1) Update Census data as it becomes available;
- 2) Regularly review perceived LEP needs with eligible and potentially eligible citizens in our community;
- 3) As opportunities arise, coordinate programs with community agencies serving LEP persons;
- 4) Document language assistance requests.

## MONITORING AND UPDATING LANGUAGE ASSISTANCE PLAN

We will monitor the Division’s efforts annually and update the LAP every three (3) years, or as needed.

Monitoring efforts will include:

- 1) Paying particular attention to demographic changes in CDD's service area that have the potential to affect LEP strategies;
- 2) Reviewing and expeditiously resolving complaints related to program access from LEP persons;
- 3) Posting the LAP and any subsequent changes on the City of Colorado Springs website;
- 4) Receiving periodic feedback from the Senior Communication Officer on the Division's efforts and LAP.