



Limited English Proficiency Plan Park District of the City of Grand Forks

TITLE VI COORDINATOR
Kati Christianson, HR & Payroll Accountant

INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Park District of the City of Grand Forks (Park District) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency 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, including all Park District divisions receiving federal grant funds.

PLAN SUMMARY

The Park District 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 Park District 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 the Park District.

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

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

The number or proportion of LEP persons in the service area who may be served or are likely to require Park District services:

The Park District staff reviewed the US Census Bureau's 2018 American Community Estimates for Grand Forks, ND and determined that 2,332 households in Grand Forks, 9.3% of the population speak a language other than English. Of those, 502 households have limited English proficiency; that is, they speak English less than "very well" or "not at all." This is only 2.0% of the overall population in Grand Forks. In Grand Forks, of those 502 households with limited English proficiency, 17 households (3.4%) speak Spanish, 188 households (37.4%) speak Other Indo-European Languages, 65 households (13.0%) speak Asian and Pacific Island languages, and 232 households (46.2%) speak all other languages.

The frequency with which LEP persons come in contact with Park District services:

The Park District staff reviewed the frequency with which their staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the Park District has had no requests for interpreters and no requests for translated program documents. The Park District's staff have had very little contact with LEP persons.

The nature and importance of services provided by the Park District to the LEP population:

There is no large geographic concentration of any type of LEP individuals in the service area for the Park District. The overwhelming majority of the population, 90.7%, speak only English. As a result, there are few social, service, or professional and leadership organizations within the Park District service area that focus on outreach to LEP individuals. The Park District staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff of impacts on service area services, and attendance at meetings.

The resources available to the Park District, and overall costs to provide LEP assistance:

The Park District 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 bilingual staff or a telephone interpreter line for which the Park District would pay a fee.

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 Park District 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 Park District 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 Park District staff will be provided with language identification cards to assist in identifying the language interpretation needed if the occasion arises.
- All Park District staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the Park District sponsors 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 very low percentage of LEP individuals in the Park District service area, that is, persons who speak English less than "very well" or "not at all", it will strive to offer the following measures:

1. The Park District 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:
 - Language interpretation will be accessed for all languages through a telephone interpretation service.

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.
- Use of interpreter service provider's language identification cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the Park District will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

The Park District 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 burden to have any documents translated.

Due to the very small local LEP population, the Park District does not have a formal outreach procedure in place, as of the signing of this document. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the Park District will consider the following options:

- 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.

- The Park District will assess requests for translation of documents based on the possible impacts and known LEP population.

MONITORING

Monitoring and Updating the LEP Plan - The Park District will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Park District service area. 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 the Park District financial resources are sufficient to fund language assistance resources needed.
- Determine whether the Park District 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.

DISSEMINATION OF THE PARK DISTRICT PLAN

- Post on the Park District website the LEP Plan and how to access language services.

Park District of the City of Grand Forks



Tim Skarperud, President, Board of Park
Commissioners

11-23-20

Date