

**Mid-Columbia Economic Development
District (MCEDD)**

Limited English Proficiency Plan

Adopted: June 15, 2017

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Introduction

This *Limited English Proficiency Plan* has been prepared to address Mid-Columbia Economic Development District'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 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 understands 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 Mid-Columbia Economic Development District (MCEDD).

MCEDD is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP person who needs language assistance
2. Identifying ways in which language assistance will be provided
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the LEP Plan

These recommended elements have been incorporated into this plan.

Methodology and Four Factor Analysis

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

MCEDD analyzes four factors to determine what reasonable steps should be taken to ensure meaningful access for LEP persons:

1. The number or proportion of LEP person eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to MCEDD and the overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed.

The Four-Factor Analysis

Each of the factors outlined above is examined to determine the extent of language assistance measures required. Recommendations in this plan are based on the results of the analysis.

Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are ‘very well,’ ‘well,’ ‘not well,’ and ‘not at all.’ Table 1 in the appendix of this plan shows the number and percent of persons in regards to their English language skills for MCEDD. Based on this information, there are 5,567 out of 77,154 (or 7.2%) which speak English less than “very well” with the majority speaking Spanish or Spanish Creole as their language.

Factor 2: Frequency of Contact with LEP Individuals

Contacts with MCEDD are made through its offices in The Dalles, its websites, its social media pages, its officers, and its staff who make presentations and build networks among public agencies and private employers in the Columbia River Gorge region. MCEDD serves LEP persons daily via: Spanish content on the MCEDD and Gorge TransLink websites that are available online at all times. We have offices accessible to the public and therefore accessible to LEP individuals, however we currently do not have much contact with LEP individuals except in our business assistance services and transportation (LINK public transportation) department. We have an average of zero calls a month that require translations, however, MCEDD utilizes translation services from partner organizations in the region to produce publications to distribute in Spanish and has used Gorge Translation Services.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP

MCEDD serves individuals throughout a five county bi-state region in a variety of ways which include Business Assistance Services, Mobility Management and Transportation Services, Technical Assistance Services and Regional Planning. While important to the region, the Technical Assistance and Regional Planning activities generally serve entities/organizations rather than individuals. The Business Assistance and Mobility Management/Transportation programs, however, engage directly with entities/organizations, as well as individuals. The nature of their services thus has greater potential for offering services to LEP individuals.

Factor 4: The Resources Available to MCEDD and the Overall Cost

MCEDD reviewed its available resources that could be used for providing LEP assistance, specifically for written resource materials and translation services for the most likely needed programs and services. MCEDD's funds are limited. Thus, the costs associated with necessary translation are allocated on an as-needed basis each fiscal year. MCEDD's current in-house language capabilities are English, with very limited Spanish. MCEDD partners with The Next Door, Inc. who have provided experienced staff fluent in Spanish to assist as needed. MCEDD has not encountered a need to have language services in other languages besides Spanish.

Implementation Plan

Options

Federal fund recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. MCEDD is defining an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as a person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

Considering the relatively small scale of MCEDD, the low concentration of LEP individuals in the service area, and MCEDD's financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Other than vital documents, if there are any language assistance measures required for the LEP individuals, MCEDD shall proceed with oral interpretation options to meet all requests for those language groups to ensure equal access while also complying with LEP regulations.

Proposed Actions

MCEDD will take the following actions:

- With advance notice of at least seven working days, MCEDD will provide interpreter services at public meetings.
- The Census Bureau "I-speak" Language Identification Card will be distributed to all employees that may potentially encounter LEP individuals.
- Publications of MCEDD's complaint form is made available on our website.
- In the event that a MCEDD employee encounters a LEP individual, they will follow the procedure listed below.

Office Encounter

1. Provide an "I-speak" language identification cards to determine the language spoken of the LEP individual.
2. Once the foreign language is determined, provide information to the Title VI coordinator who will contact an interpreter.
3. If the need for a vital document to be translated arises, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

In Writing

1. Once a letter has been received it will be immediately forwarded to the Title VI Coordinator.
2. The Title VI Coordinator will contact a translator to determine the specifics of the letter request information.
3. The Title VI Coordinator will work with the elected agency to provide the requested service to the individual in a timely manner.

Over the Phone

1. If someone calls into MCEDD office speaking another language, every attempt will be made to keep that individual on the line until an interpreter can be conferenced into the line and if possible determine the language spoken of the caller.
2. Once the language spoken by the caller has been identified, we will proceed with providing the requested assistance to the LEP individual.

MCEDD Staff Training

MCEDD staff will be provided training at staff meetings of the requirements for providing meaningful access to services for LEP persons.

Providing Meaningful Access to Limited English Proficient (LEP) Persons

Title VI and its implementing regulations require that recipients of federal funds take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. MCEDD partners with local nonprofits to provide translation services as necessary.

Employee Responsibility

Each employee shall:

1. Ensure that there are no barriers to service or accommodation that would prevent usage or access to services.
2. Train subordinates as to what constitutes discrimination and barriers to access.
3. Take prompt and appropriate action to avoid and minimize the incidence of any form of discrimination.
4. Notify the Executive Director in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day.

Notice and Access

Providing Notice to LEP Persons

MCEDD will provide language service by notifying LEP persons of services available free of charge. MCEDD will post the LEP Plan on our website. MCEDD will post notices of available services, in languages LEP persons would understand, in the office in places where LEP persons may seek services and on our website.

MCEDD staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year to identify modifications to this plan to improve outreach and services to Limited English Proficient Persons.

LEP Plan Access

A copy of the LEP plan document can be requested at MCEDD's main office during normal business hours:

MCEDD Title VI Coordinator
802 Chenoweth Loop Road
The Dalles, OR 97058
541-296-2266

Our website includes our Title VI policy and complaint form. The website also states the Anti-Discrimination Statement. MCEDD's Title VI policy and complaint form are also posted at MCEDD's office and The Dalles Transit Center (802 Chenoweth Loop Road, The Dalles, OR). Individuals who believe they have been discriminated against may request a complaint form from the Office Administrator at MCEDD's office.

Table 1: Language Spoken at Home by Ability to Speak English (Population 5 yrs and over)

2011-2015 American Community Survey 5-Year Estimates

	TOTAL ESTIMATE	Hood River County,		Sherman County,		Wasco County,		Klickitat County,		Skamania County,	
		Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:	77,154	21,236	+/-56	1,682	+/-113	23,893	+/-58	19,645	+/-121	10,698	+/-49
Speak only English	64,966	15,240	+/-291	1,602	+/-111	20,255	+/-370	17,843	+/-244	10,026	+/-136
Spanish or Spanish Creole:	10,485	5,694	+/-243	76	+/-35	2,990	+/-348	1,349	+/-224	376	+/-96
Speak English "very well"	5,185	2,768	+/-348	36	+/-23	1,400	+/-213	743	+/-213	238	+/-74
Speak English less than "very well"	5,300	2,926	+/-388	40	+/-30	1,590	+/-297	606	+/-230	138	+/-53
French (incl. Patois, Cajun):	293	114	+/-103	0	+/-12	23	+/-15	111	+/-94	45	+/-34
Speak English "very well"	284	114	+/-103	0	+/-12	21	+/-14	111	+/-94	38	+/-29
Speak English less than "very well"	9	0	+/-22	0	+/-12	2	+/-3	0	+/-22	7	+/-12
Italian:	9	0	+/-22	0	+/-12	7	+/-13	2	+/-4	0	+/-19
Speak English "very well"	9	0	+/-22	0	+/-12	7	+/-13	2	+/-4	0	+/-19
Portuguese or Portuguese Creole:	13	0	+/-22	0	+/-12	11	+/-15	2	+/-3	0	+/-19
Speak English "very well"	13	0	+/-22	0	+/-12	11	+/-15	2	+/-3	0	+/-19
German:	140	15	+/-20	0	+/-12	70	+/-59	11	+/-12	44	+/-26
Speak English "very well"	118	15	+/-20	0	+/-12	54	+/-52	11	+/-12	38	+/-26
Speak English less than "very well"	22	0	+/-22	0	+/-12	16	+/-17	0	+/-22	6	+/-8
Other West Germanic languages:	44	9	+/-14	0	+/-12	19	+/-20	13	+/-19	3	+/-5
Speak English "very well"	40	9	+/-14	0	+/-12	15	+/-16	13	+/-19	3	+/-5
Speak English less than "very well"	4	0	+/-22	0	+/-12	4	+/-10	0	+/-22	0	+/-19
Scandinavian languages:	50	0	+/-22	0	+/-12	9	+/-13	34	+/-48	7	+/-7
Speak English "very well"	50	0	+/-22	0	+/-12	9	+/-13	34	+/-48	7	+/-7
Greek:	9	0	+/-22	0	+/-12	9	+/-14	0	+/-22	0	+/-19
Speak English "very well"	9	0	+/-22	0	+/-12	9	+/-14	0	+/-22	0	+/-19
Russian:	53	0	+/-22	0	+/-12	18	+/-27	2	+/-5	33	+/-53
Speak English "very well"	35	0	+/-22	0	+/-12	5	+/-7	2	+/-5	28	+/-46
Speak English less than "very well"	18	0	+/-22	0	+/-12	13	+/-20	0	+/-22	5	+/-7
Polish:	9	0	+/-22	0	+/-12	9	+/-14	0	+/-22	0	+/-19
Speak English "very well"	9	0	+/-22	0	+/-12	9	+/-14	0	+/-22	0	+/-19
Serbo-Croatian:	8	5	+/-11	0	+/-12	0	+/-22	0	+/-22	3	+/-5
Speak English "very well"	8	5	+/-11	0	+/-12	0	+/-22	0	+/-22	3	+/-5
Other Slavic languages:	45	16	+/-28	0	+/-12	22	+/-35	0	+/-22	7	+/-10
Speak English less than "very well"	45	16	+/-28	0	+/-12	22	+/-35	0	+/-22	7	+/-10
Persian:	72	9	+/-14	0	+/-12	0	+/-22	63	+/-46	0	+/-19
Speak English "very well"	27	9	+/-14	0	+/-12	0	+/-22	18	+/-14	0	+/-19
Speak English less than "very well"	45	0	+/-22	0	+/-12	0	+/-22	45	+/-33	0	+/-19
Gujarati:	8	0	+/-22	0	+/-12	0	+/-22	0	+/-22	8	+/-12
Speak English less than "very well"	8	0	+/-22	0	+/-12	0	+/-22	0	+/-22	8	+/-12
Hindi:	2	0	+/-22	0	+/-12	0	+/-22	0	+/-22	2	+/-3
Speak English "very well"	2	0	+/-22	0	+/-12	0	+/-22	0	+/-22	2	+/-3
Urdu:	10	0	+/-22	0	+/-12	10	+/-23	0	+/-22	0	+/-19
Speak English less than "very well"	10	0	+/-22	0	+/-12	10	+/-23	0	+/-22	0	+/-19
Other Indic languages:	63	0	+/-22	0	+/-12	0	+/-22	0	+/-22	63	+/-60
Speak English "very well"	63	0	+/-22	0	+/-12	0	+/-22	0	+/-22	63	+/-60
Chinese:	194	73	+/-102	1	+/-3	101	+/-148	16	+/-21	3	+/-5
Speak English "very well"	126	33	+/-50	1	+/-3	80	+/-174	12	+/-19	0	+/-19
Speak English less than "very well"	68	40	+/-57	0	+/-12	21	+/-48	4	+/-8	3	+/-5
Japanese:	61	9	+/-14	0	+/-12	9	+/-18	26	+/-40	17	+/-24
Speak English "very well"	42	0	+/-22	0	+/-12	5	+/-11	20	+/-30	17	+/-24
Speak English less than "very well"	19	9	+/-14	0	+/-12	4	+/-10	6	+/-15	0	+/-19
Korean:	62	9	+/-15	0	+/-12	4	+/-8	42	+/-61	7	+/-10
Speak English "very well"	51	9	+/-15	0	+/-12	0	+/-22	42	+/-61	0	+/-19
Speak English less than "very well"	11	0	+/-22	0	+/-12	4	+/-8	0	+/-22	7	+/-10
Vietnamese:	10	10	+/-15	0	+/-12	0	+/-22	0	+/-22	0	+/-19
Speak English "very well"	10	10	+/-15	0	+/-12	0	+/-22	0	+/-22	0	+/-19
Tagalog:	41	33	+/-62	0	+/-12	0	+/-22	8	+/-15	0	+/-19
Speak English "very well"	33	33	+/-62	0	+/-12	0	+/-22	0	+/-22	0	+/-19
Speak English less than "very well"	8	0	+/-22	0	+/-12	0	+/-22	8	+/-15	0	+/-19
Other Pacific Island languages:	175	0	+/-22	0	+/-12	87	+/-95	85	+/-94	3	+/-7
Speak English "very well"	175	0	+/-22	0	+/-12	87	+/-95	85	+/-94	3	+/-7
Navajo:	22	0	+/-22	0	+/-12	22	+/-24	0	+/-22	0	+/-19
Speak English "very well"	22	0	+/-22	0	+/-12	22	+/-24	0	+/-22	0	+/-19
Other Native North American languages:	174	0	+/-22	0	+/-12	171	+/-87	3	+/-7	0	+/-19
Speak English "very well"	163	0	+/-22	0	+/-12	160	+/-88	3	+/-7	0	+/-19
Speak English less than "very well"	11	0	+/-22	0	+/-12	11	+/-12	0	+/-22	0	+/-19
Arabic:	47	0	+/-22	0	+/-12	47	+/-107	0	+/-22	0	+/-19
Speak English "very well"	47	0	+/-22	0	+/-12	47	+/-107	0	+/-22	0	+/-19
African languages:	33	0	+/-22	3	+/-5	0	+/-22	30	+/-68	0	+/-19
Speak English "very well"	33	0	+/-22	3	+/-5	0	+/-22	30	+/-68	0	+/-19
Other and unspecified languages:	56	0	+/-22	0	+/-12	0	+/-22	5	+/-8	51	+/-74
Speak English "very well"	26	0	+/-22	0	+/-12	0	+/-22	5	+/-8	21	+/-31
Speak English less than "very well"	30	0	+/-22	0	+/-12	0	+/-22	0	+/-22	30	+/-44