

Engaging LEP Communities



Language Access Plan

Prepared by the
Northwest Louisiana Council
of Governments

Adopted January 19, 2018

Engaging Limited English Proficient (LEP) Communities

Language Access Plan

Prepared by:

Northwest Louisiana Council of Governments

Adopted January 19, 2018

Disclaimer:

The preparation of this document was financed through grants from, and disseminated under the sponsorship of, the Federal Highway Administration, the Louisiana Department of Transportation and Development, and the Northwest Louisiana Council of Governments. The United States Government and the State of Louisiana assume no liability for its contents or use thereof.

Non-Discrimination Statement

The Northwest Louisiana Council of Governments (NLCOG) complies with the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and other federal equal opportunity laws and, therefore, does not discriminate on the basis of race, sex, color, age, national origin, religion or disability; in admission to, access to, treatment in or operations of its programs, services, or activities. NLCOG does not discriminate in its hiring or employment practices.

Questions, concerns, complaints, or requests for additional information regarding the non-discrimination policies may be directed to the designated Title VI, ADA and Section 504 Compliance Coordinator:

Lisa M. Frazier
Public Involvement Coordinator
(318) 841-5950 (voice)
Lisa.frazier@nlcog.org
625 Texas Street, Suite 200
Shreveport, LA 71101

These policies are intended to cover the most common situations not already covered by the Northwest Louisiana Council of Governments (NLCOG) Bylaws or Personnel Policies. In situations not specifically detailed herein, NLCOG, its committees, supervisors and employees, shall use its respective best judgment in responding to unusual situations.

Table of Contents

Introduction	1
Figure 1 – NLCOG Planning Area	2
Figure 2 – Language Characteristics of the Planning Area	3
Purpose and Authority	4
Definitions	4
Four-Factor Analysis	5
Safe Harbor Stipulation	7
LEP Population Identification	7
Table 1 – Languages Spoken in the NLCOG Planning Area	8
Identifying Individuals with Low Literacy	9
Table 2 – Low Literacy Population in the Planning Area	9
Language Assistance Measures	10
Table 3 – Language Service Agencies	10
MPO Staff Training	11
Monitoring and Updating the LEP Language Access Plan	11
Dissemination of the LEP Language Access Plan	12
Figure 3 – Public Comment Period Notice	13
Complaint Procedure	14
Limited English Proficiency Policy Statement	15
Appendix	16
LEP Language Access Plan Maps	17
Agency Self – Assessment	31

Engaging Individuals with Limited English Proficiency (LEP)

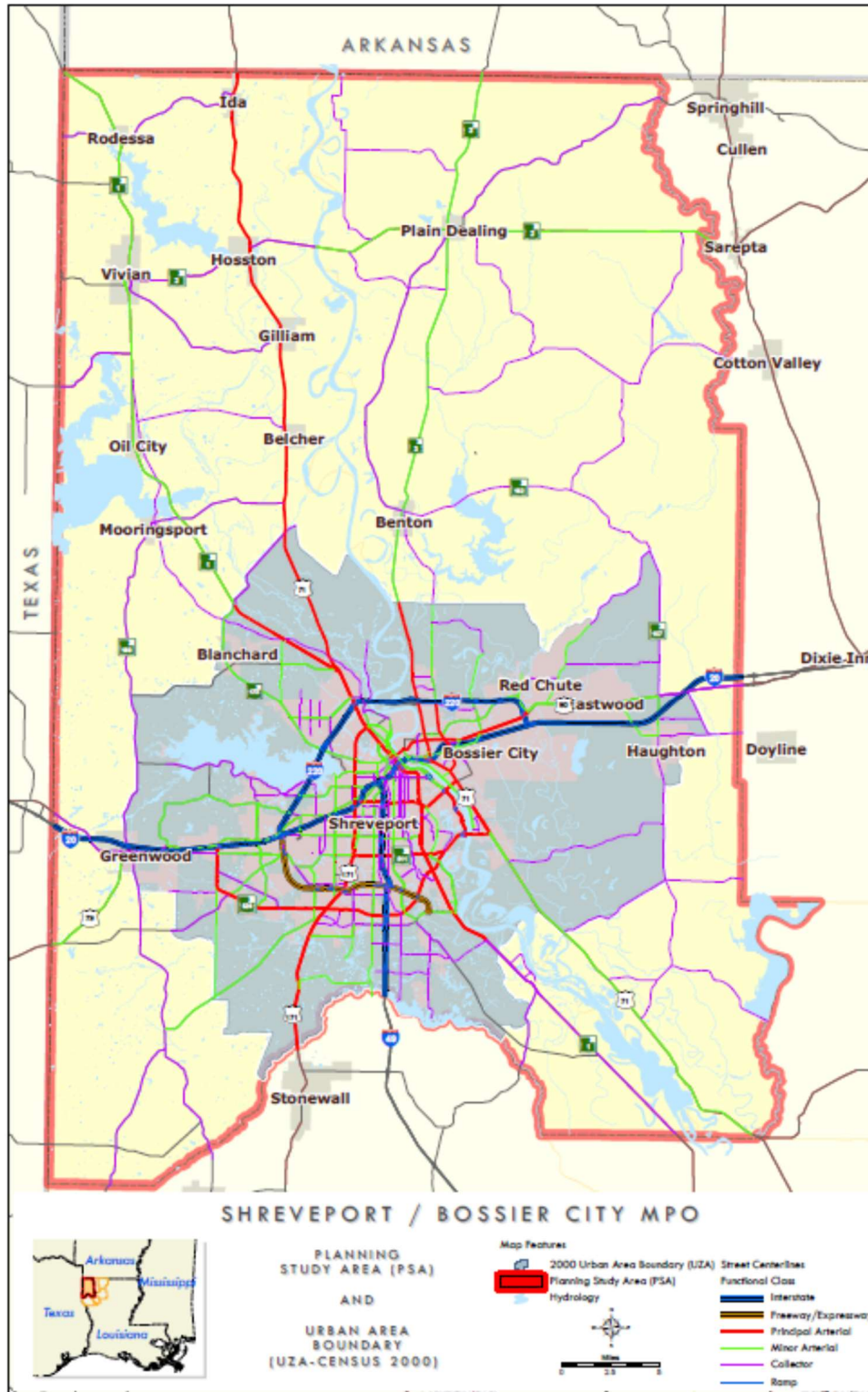
Introduction

The Northwest Louisiana Council of Governments (NLCOG) is an intergovernmental association of local governments established to assist in planning for common needs, cooperating for the mutual benefit, and coordinating for sound regional development.

As an association of cities, towns, parishes, ports, and state agencies that serves as a forum for developing policies and making decisions about regional growth and transportation issues, NLCOG does not provide any direct services to the population of Northwest Louisiana. However, NLCOG encourages public comment on its policies, programs, and funding cycles, and would like to increase opportunities for public comment, particularly by historically underserved populations, including LEP individuals.

Under federal law, NLCOG is recognized as the Metropolitan Planning Organization (MPO) for Northwest Louisiana. For any urbanized area with a population of more than 50,000, the formation of an MPO is mandated. The planning area for the MPO includes Bossier and Caddo Parishes.

Figure 1 - NLCOG's Planning Area

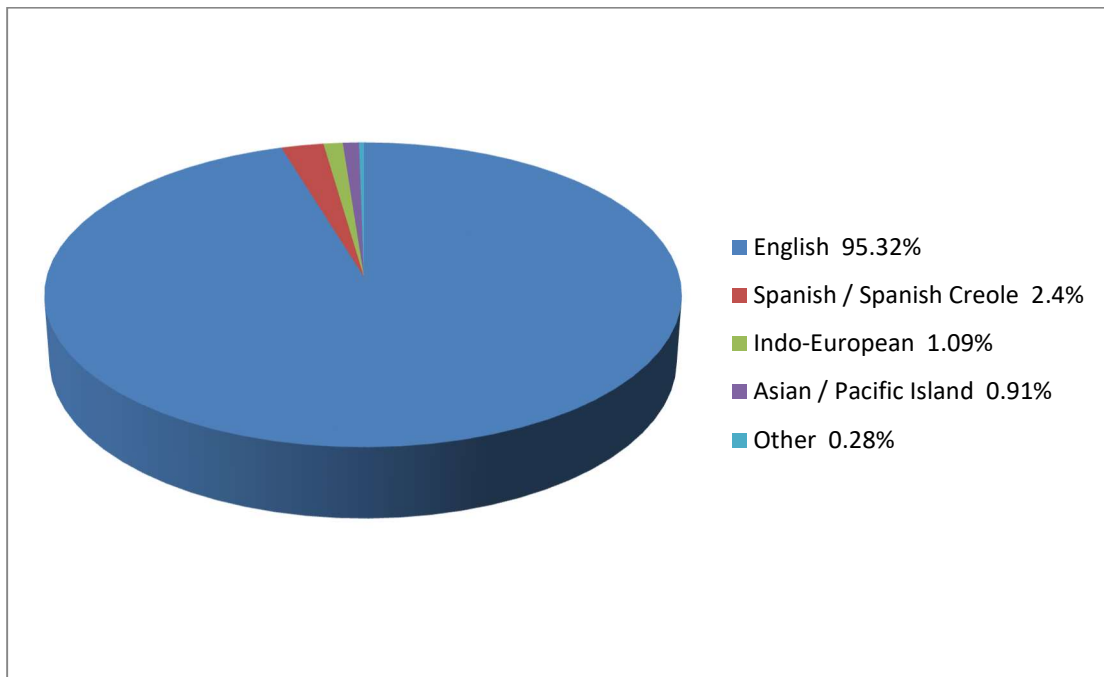


NLCOG also serves as the Regional Planning Council and its purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions for the benefit of the community.

This is achieved by developing and implementing constructive and workable policies and programs for solving area wide problems. These issues include, but are not limited to, matters affecting transportation, economic, healthy, safety, welfare, education, and regional development issues. Our focus remains on developing Northwest Louisiana economically, socially, and environmentally through a variety of projects aimed at improving the quality of life for all citizens.

Most individuals living within NLCOG’s planning area read, write, speak and understand English. However, there are many individuals for whom English is not their primary language. For instance, based on the 2012 American Community Survey, 6.6% of the population (5 years and older) speak a language other than English while 1.95%, or 6,747 people, of the population (5 years and older) speak a language other than English and speak English less than very well.

Figure 2 – Language Characteristics of the Planning Area



Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

A Limited English Proficient (LEP) person is one who does not speak English as the primary language and who has a limited ability to read, speak, write or understand English. NLCOG seeks ways to increase opportunities for public comment on its activities, including policies,

programs, and funding cycles. NLCOG is particularly interested in increasing opportunities for historically underserved populations to provide input regarding its planning activities.

NLCOG is committed to assisting individuals, for whom English is not their primary language, understand and have access to MPO programs, activities, or services. Language barriers for many LEP individuals can be a hindrance to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by federally funded programs and activities.

It is the policy of NLCOG to provide timely, meaningful access for LEP persons to all agency programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that NLCOG will provide these services.

Purpose and Authority

NLCOG developed this LEP Language Access Plan to identify reasonable steps to provide language assistance for LEP persons who seek meaningful access to MPO programs as required by federal law. The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons With Limited English Proficiency” (August 16, 2000), for agency personnel to follow when providing services to, or interacting with, individuals who are LEP. Following these guidelines is essential to the success of NLCOG’s mission and vision.

The LEP Language Access plan is a roadmap that helps NLCOG navigate the process of setting deadlines and priorities; identifying responsible personnel for policy and procedures development; hire, contract assess and ensure quality control of language assistance services; provide staff training; and conduct on-going monitoring and evaluation.

Definitions

Interpretation – Method to render a message spoken in one language into one or more other languages.

Language assistance services – Oral (interpretation) and/or written (translation) assistance for an LEP individual.

Limited English Proficient (LEP) – Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Metropolitan planning organization (MPO) – federally-mandated and federally-funded transportation policy-making organization in the United States that is made up of representatives from local government and governmental transportation authorities.

Planning Area – The MPO planning area boundaries are established by each local MPO according to the federal metropolitan planning regulations and is intended to include, at a

minimum, the approved urban area boundary plus the adjacent area that the MPO anticipates may become urbanized during the life of the 20-year timeframe of the regional long range transportation plan.

Primary language – The language that a person acquires in earliest childhood; also called native language.

Translation – The replacement of written text from one language into another.

Vital Documents – A document is considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law. These may include, but not be limited to, complaint forms; application forms; written notices of rights; outreach materials; signs; and notices advising LEP individuals of free language assistance services.

Four-Factor Analysis

The U.S. Department of Justice provided guidance on engaging LEP individuals. The guidance offers a “four-factor analysis” process, which the Title VI Officer used to determine the number and proportion of LEP individuals in the region and how to effectively provide information services to these individuals. The process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact with the program, the importance of the program to people’s lives, and the resources available to provide translation services.¹

In developing this LEP access plan, and in determining the MPO’s extent of obligation to provide LEP services, NLCOG undertook the U.S. Department of Justice’s four-factor LEP analysis.

1) The number or proportion of LEP persons eligible in the service area or who are likely to encounter an MPO program, activity or service.

NLCOG examined U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates and determined that 1.7% (or 6,008 people ages five and older) within the MPO planning area speak English less than very well.

2) The frequency with which LEP individuals come into contact with an MPO program.

NLCOG assessed the frequency at which staff had or could possibly have contact with LEP persons. From July 2009 through October 2017, NLCOG received zero (0) requests for an interpreter and zero (0) requests for translated MPO documents.

Historically, NLCOG staff, when promoting neighborhood-specific programs as part of its “Kids On the Move!” Safe Routes to School program, considered the language characteristics of the neighborhoods and the region to determine what language access opportunities existed. The demographics and language composition of one school’s neighborhood, and the data the school shared regarding its English as a Second Language (ESL) population (57

¹ This language was taken directly from the U.S. Government’s Limited English Proficiency Web site, <http://www.lep.gov/reciproch.html>.

students), offered NLCOG the opportunity to print materials in Spanish for the Neighborhood Open House meetings and Walk to School days.

3) The nature and importance of this program, activity, or service provided by the MPO to the LEP population.

The largest LEP populations reside in the neighborhoods of Cumberland, Meadowview Park, Central Park, Airport Annex, and Greenacres in Bossier City; Dogwood and Red Chute in Bossier Parish; Allendale, Ingleside, Caddo Heights, Madison Park, Waterside, and South Lakeshore neighborhoods in Shreveport. Although NLCOG has not conducted any formal outreach efforts to identify which MPO programs would be of importance to an LEP person. SporTran, the local public transit operator, has their own LEP plan (under Federal Transit Administration review, June 2014) which identifies many services available within these LEP neighborhoods.

SporTran routinely surveys, monitors and assesses major points of contact with the public at their fixed route terminal customer service department. This connection to the public also provides transit routing information, purchases of bus passes and tickets, telephone communications, handling of customer complaints and more. SporTran's ParaTransit program (LiftLine) allows them to identify LEP persons during the eligibility process. There has been one occasion where SporTran provided a Spanish-translated ParaTransit Handbook to a rider who had limited English reading skills. Out of the 1,000 customers served with the LiftLine program, this was the only instance that SporTran needed to provide information in another language.

Additionally, SporTran frequently monitors bus routes and the ParaTransit service for quality of service as well as LEP assessments. SporTran operators and staff have reported that very seldom have they encountered passengers who would be identified as LEP individuals. Within the last two years, SporTran has met only one person who required translation assistance with regard to the fixed bus route. This individual was assisted by a Spanish-speaking executive assistant located in the administrative office at that time.

It is anticipated that through this four-factor analysis NLCOG staff will be better prepared to anticipate and meet the needs of LEP communities in Northwest Louisiana. Important planned activities include updating the Long Range Transportation Plan (LRTP); publication of reports such as the Annual Listing of Obligated Projects and the annual Title VI and Environmental Justice Report; and expansion of the "Kids On the Move!" Safe Routes to School program. All of these activities may impact LEP communities; therefore, public education and involvement is crucial.

4) The resources available to NLCOG and overall cost to provide LEP assistance.

NLCOG assessed its available resources that could be used for providing LEP assistance. This included identifying what staff and volunteer language interpreters are readily available, how much a professional interpreter and translation service would cost, and which documents should be translated. NLCOG inventoried community organizations that could provide a partnership for outreach and translation efforts. NLCOG also evaluated how to reduce costs through partnerships with other agencies for translation and interpretation efforts via in-kind and financial sources, as well as determining what level of staff training may be needed to utilize staff as interpreters/translators.

NLCOG has limited resources to pursue translation services; therefore, an ideal solution would be to find a low-cost point-of-access for LEP individuals. This gives LEP individuals a way to find out about NLCOG's activities and provides a method for NLCOG to determine the demand for translation services.

After analyzing the four factors, NLCOG developed the following plan for assisting persons of limited English proficiency.

Safe Harbor Stipulation

Federal law provides a "safe harbor" stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A "safe harbor" means that if a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. Failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four-factor analysis.

Compliance with written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of eligible persons served or likely to be affected. Translation can also be provided orally. The "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

LEP Population Identification

The Census definition of a LEP person is "... a person who speaks another language other than English at home and does not speak English well or not at all." NLCOG, in this analysis, included all persons who "speak English less than very well."

NLCOG used the Census-defined "collapse" of the 382 reported language categories into four major language groups: Spanish; Other Indo-European languages; Asian and Pacific Island languages; and All Other languages.

This analysis of the 2012 American Community Survey data showed that 6.6% of the population speaks a language other than English at home, but 1.95% (or 6,747 people) speak a language other than English at home and speak English less than very well making it the total LEP population. Of that 1.95% LEP population:

Table 1 – Languages Spoken in NLCOG Planning Area

Language	Total Pop. Age 5+	Speak English Less Than Very Well	% Speak English Less Than Very Well
Bossier Parish (Total Pop. 114,343)			
Spanish or Spanish Creole	4,435	1,821	41.1%
Other Indo-European Languages	1,214	267	22.0%
Asian and Pacific Island Languages	1,351	567	42.0%
All other languages	473	91	19.2%
Caddo Parish (Total Pop. 236,334)			
Spanish or Spanish Creole	3,979	1,628	40.9%
Other Indo-European Languages	2,619	502	19.2%
Asian and Pacific Island Languages	1,857	883	47.5%
All other languages	496	249	50.2%
Total	16,424	6,008	36.58%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Several languages are spoken within the planning area of Bossier and Caddo Parishes, but proportionally the percentages of people speaking a language other than English at home was relatively low. The number of people reporting that they also speak English “very well” or “well” offset this even more. According to the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, the top language spoken at home in the region is Spanish/Spanish Creole. Spanish is spoken at home by 2.39% of the region’s population. More than 75% of this group reported that they speak English “very well” or “well.”² According to the U.S. Census Bureau’s Language Mapper online tool³, those that speak English “less than very well” speak Spanish, French, Italian, German, Polish, Chinese, Japanese, Vietnamese, Tagalog, and Arabic.

NLCOG used the following methodology to identify persons who may need language assistance:

² NLCOG based this analysis on data from the U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates.

³ Source: U.S. Census Bureau, 2007-2011 American Community Survey, Table B16001. http://www.census.gov/hhes/socdemo/language/data/language_map.html

1. Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
2. For public meetings in which members of this community are specifically addressed, include an option to request a translator in the invitations sent;
3. Have the Census Bureau’s “I Speak” cards at all workshops and conference sign-in tables; at public meetings and open houses; and in the NLCOG offices. While a translator may not be present at that meeting, the cards will help NLCOG anticipate future needs;
4. Post a notice of available language assistance services at NLCOG’s reception area;
5. Confer and share information with local partner organizations serving the LEP individuals in the community.

Identifying Individuals with Low Literacy

Combined with the non-discrimination statues previously listed, meaningful access also extends to people who cannot read and understand what is read; thus, the need to include outreach to low-literate populations as well. Literacy is defined by the National Literacy Act of 1991 as, “an individual’s ability to read, write, and speak in English, and compute and solve problems at levels of proficiency necessary to function on the job and in society, to achieve one’s goals, and develop one’s knowledge and potential.”

For this report, NLCOG used the National Adult Literacy Survey’s literacy Level 1 definition: “Level 1 is generally defined as less than fifth-grade reading and comprehension skills.” Level 1 adults are not considered “illiterate,” they generally can read a little, but do not have the full range of economic, social and personal options that are open to those with higher levels of literacy skills.

To help identify those individuals with low literacy, NLCOG looked at the educational attainment of adults. Those with less than a ninth (9th) grade education are presumed to be low literate. Data shows 3.72% (or 9,242 people) of the population 25 years and older have less than a ninth (9th) grade education.

Table 2 – Low Literacy Population in the Planning Area

Population	Population Total	Percent	Total with less than 9 th grade education
Bossier Parish (Total Pop. 114,343)			
25 years and older	80,195	3.3%	2,642
Caddo Parish (Total Pop. 236,334)			
25 years and older	168,163	3.9%	6,600
Total	248,358	3.72%	9,242

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Language Assistance Measures

An individual who is low-literate and/or LEP is more than just a person who has poor reading, writing and comprehension skills; and/or may not speak English well, or at all. These conditions affect a person’s ability to participate in the decision-making process at many levels. Sign-in sheets may be a barrier to participation for those that are low-literate or LEP. A simple and effective remedy is to have a staff person or volunteer stand at the door or table and write down names and addresses of participants. Engaging a community leader to help greet can also help.

Low-literate and LEP populations who cannot read listen more carefully to what is said, how it is said, and who says it. Asking people “if they have the time to talk with you” tells them they will not have to read or write anything, and will not be talked to, but talked with. If written material is put in front of someone who cannot read or understand English, they may only glance at it. Using large maps and boards and assigning a staff member to lead an open discussion about the project can give enough information to the public so they can give open feedback. When writing down public comments, staff members should read back the comment to the person to make sure their thoughts are fully recorded.

To date, NLCOG has not received language translation inquiries for a language other than English. If someone does request assistance, staff members will take the name and number of the person and NLCOG will plan with an appropriate community agency for translation of written communications or MPO document translation requests from LEP persons.

Vital documents, including complaint forms, application forms, written notices of rights, outreach materials, signs, and public notices will be translated into Spanish per the results of the four-factor analysis. These translated documents will be posted on the NLCOG website and available upon request. NLCOG will continue to monitor the languages spoken by individuals in the planning area and will provide translation and interpretation services upon request.

Table 3 – Language Service Agencies

Agency	Contact
Bossier Parish	
Bossier City Police Department Community Relations/Crime Prevention Officers	318-741-8351
Bossier Parish Schools English Language Learner Program	318-549-6200
Bossier Parish Community College	Foreign Language Lab 318-678-6000 Economic and Workforce Development 318-678-6479

Caddo Parish	
Shreveport Police Department Community Liaison Officers/Operation TBONE	318-673-7357 318-673-7381
Caddo Parish Schools Title I Community Involvement	318-603-6522
The Betty and Leonard Phillips Deaf Action Center	318-425-7781
The Facet Group	318-861-5757
Louisiana State University – Shreveport Foreign Language Audio and Multimedia Center	318-797-5140

In the future, NLCOG may consider purchasing online services that would offer instant translation of the NLCOG Web site, www.nlcog.org.

MPO Staff Training

The Title VI Coordinator will make the LEP Language Access Plan available to all staff and will educate the staff on procedures and services available. This information will be reviewed with staff annually. Training topics are listed below:

- Understanding NLCOG’s Title VI LEP responsibilities;
- Language assistance services NLCOG offers;
- Use of the “I Speak” cards;
- How to access a staff interpreter (if available);
- Documentation of language assistance requests;
- How to handle a complaint;
- The importance of educating subrecipients on NLCOG’s LEP program responsibilities and their obligation to provide language assistance; and
- Provide translation of literature/materials to the community upon request.

Monitoring and Updating the LEP Language Access Plan

This plan is designed to be flexible and is one that can easily be updated. At a minimum, NLCOG will follow the Title VI Program update schedule for the LEP Language Access Plan. Each update will examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What are the current LEP populations in the planning area?
- Has there been a change in the languages where translation services are needed?
- Is there a change in the need for language assistance?
- Have NLCOG's available resources (i.e. technology, financial costs and staff) changed?
- Were any complaints received?

The Title VI Coordinator will also complete the "LEP Self Assessment" form in the Appendix.

Dissemination of the LEP Language Access Plan

NLCOG will post the LEP Language Access Plan on its website at www.nlcog.org. Any person, including social service, non-profit, and law enforcement agencies, and other community partners with internet access will be able to access the plan. All public libraries in the planning area have internet access available to patrons.

For those without internet access, copies of the plan will be provided to all public libraries and dissemination will follow the Public Involvement Plan. LEP persons may obtain copies/translations of the plan upon request. A public comment period of thirty (30) days will be advertised via block ad in the legal publication(s) as outlined in the Public Involvement Plan. Any questions or comments regarding this plan should be directed to:

NLCOG
Attn: LEP
625 Texas Street, Suite 200
Shreveport, LA 71101

Figure 3 – Public Comment Period Notice

Public Comment Period	<i>Northwest Louisiana Council of Governments</i>
	Engaging Limited English Proficient Communities Language Access Plan
	<i>Public Comment Period</i>
	November 19, 2017 – December 18, 2017
	<p>A Limited English Proficient (LEP) person is one who does not speak English as the primary language and who has a limited ability to read, speak, write or understand English. The Northwest Louisiana Council of Governments (NLCOG) is committed to assisting individuals, for whom English is not their primary language, understand and have access to programs, activities, or services. It is the policy of the NLCOG to provide timely, meaningful access for LEP persons to all agency programs and activities.</p> <p>NLCOG's LEP Language Access Plan identifies reasonable steps to provide language assistance for LEP persons who seek access to MPO programs as required by federal law. The purpose of this policy is to establish effective guidelines consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency" (August 16, 2000).</p> <p>All interested citizens are encouraged to access the draft LEP Language Access Plan at www.nlcog.org or by requesting a printed copy from the office of NLCOG at (318) 841-5950. Comments may be e-mailed to public_comments@nlcog.org or mailed to:</p> <p>NLCOG Attn: Lisa M. Frazier – LEP 625 Texas Street, Suite 200 Shreveport, Louisiana 71101</p> <p>All written public comments relative to this draft document should be postmarked no later than December 18, 2017.</p>

Complaint Procedure

Please file a written complaint with the NLCOG Title VI Coordinator if you believe you have been denied the benefits of this plan. Complaints must be filed within six (6) months of the alleged denial. All complaints must be written and submitted to:

Lisa M. Frazier
NLCOG
Attn: LEP
625 Texas Street, Suite 200
Shreveport, LA 71101
lisa.frazier@nlcog.org

Limited English Proficiency Policy Statement

The Executive Committee of the Northwest Louisiana Council of Governments established the following policy for providing information to individuals with Limited English Proficiency (LEP):

“A limited English Proficient (LEP) person is one who does not speak English as the primary language and who has a limited ability to read, speak, write or understand English. NLCOG seeks opportunities to increase opportunities for public comment on its activities, including policies, programs, and funding cycles. NLCOG is particularly interested in increasing opportunities for historically underserved populations to provide input regarding its planning activities.

NLCOG is committed to assisting individuals, for whom English is not their primary language, understand and have access to MPO programs, activities, or services. Language for many LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities or understanding other information provided by federally funded programs and activities.

It is the policy of the (NLCOG) to provide timely, meaningful access for LEP persons to all agency programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that the agency will provide these services.”

Adopted January 19, 2018



J. Kent Rogers, Executive Director

January 19, 2018

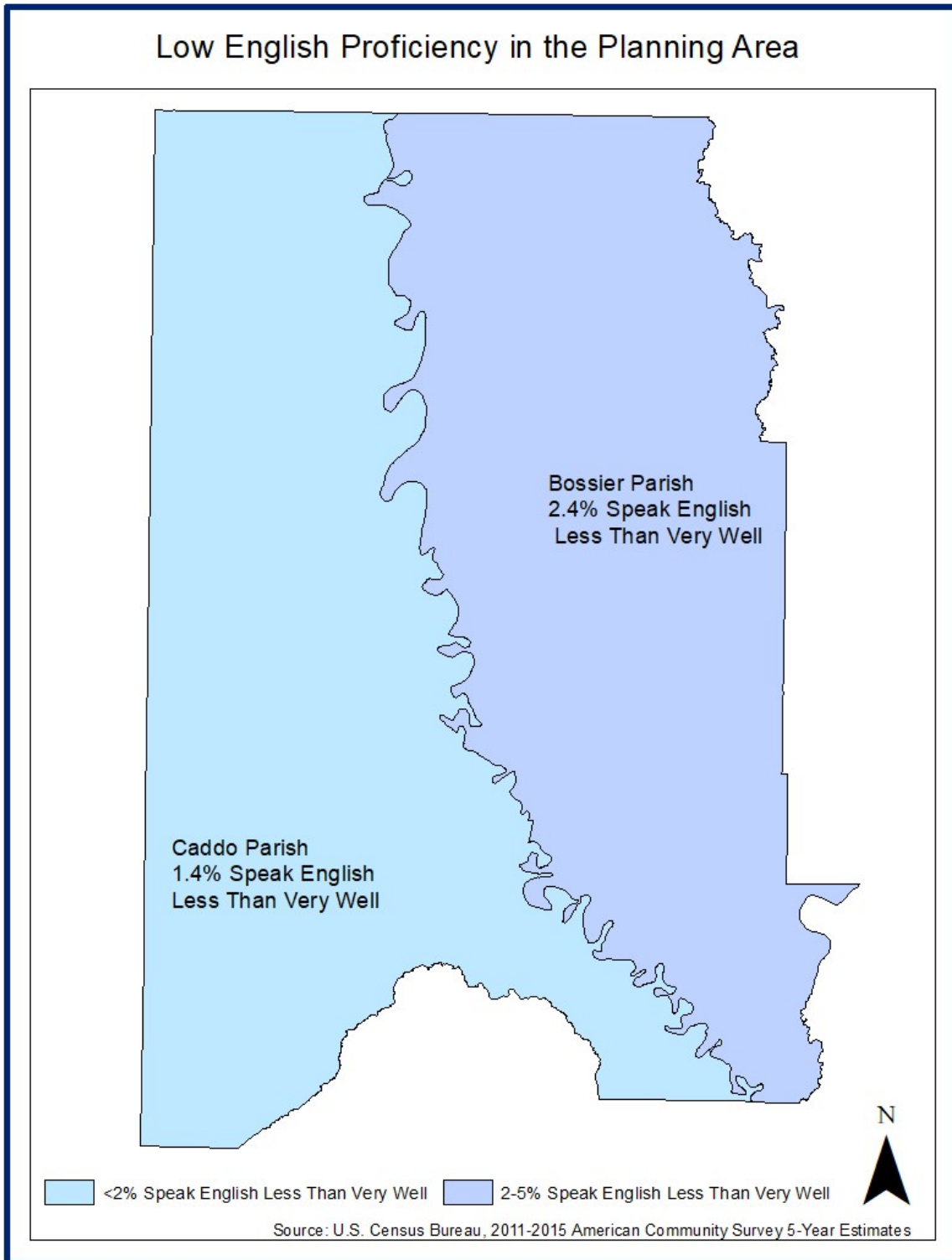
Date

Appendix

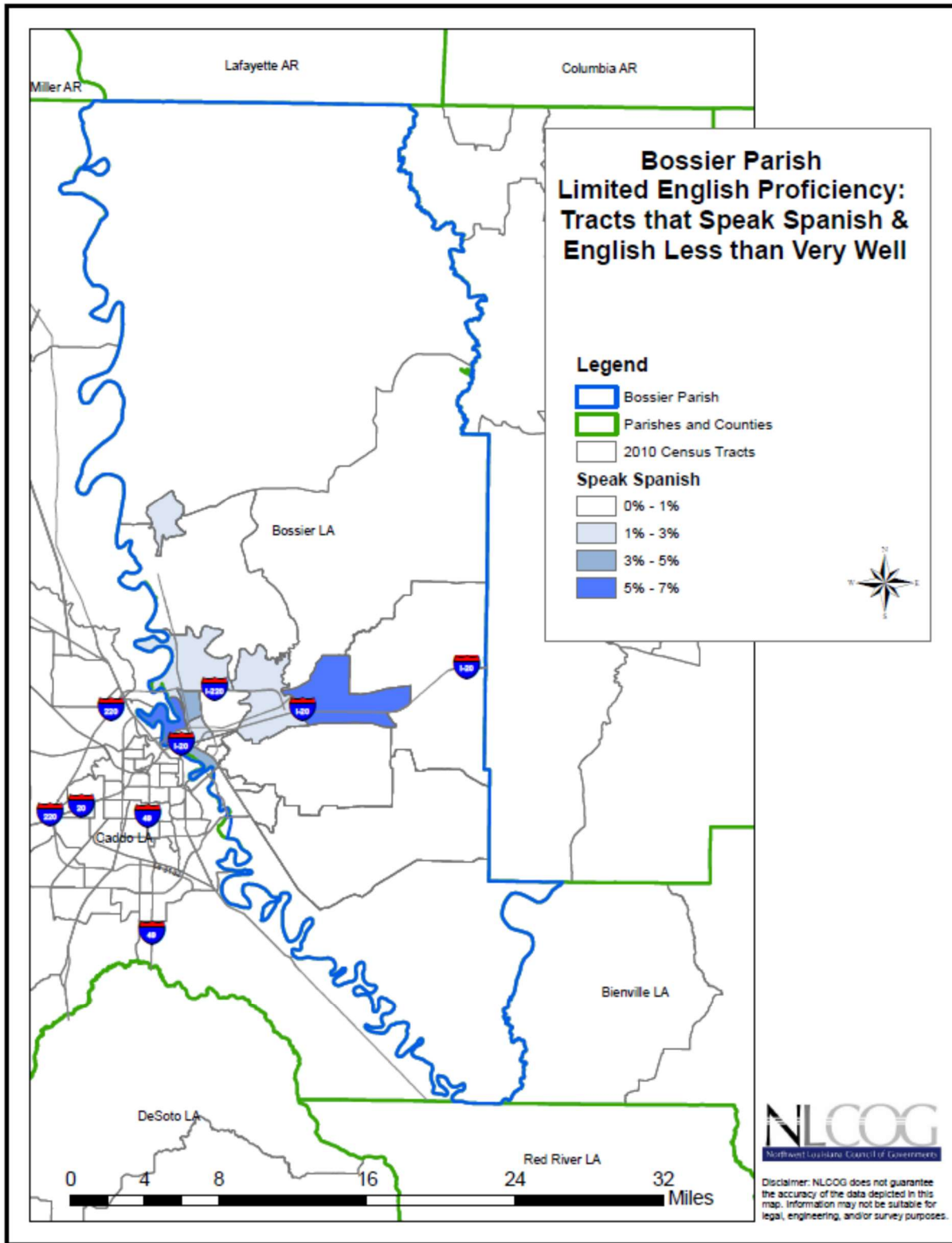
LEP Language Access Plan Maps

Limited English Proficiency in the Planning Area	17
Bossier Parish LEP Population – Spanish or Spanish Creole	18
Bossier City LEP Population – Spanish or Spanish Creole	19
Bossier Parish LEP Population – Asian / Pacific Island Languages	20
Bossier City LEP Population – Asian / Pacific Island Languages	21
Bossier Parish LEP Population – Other Languages	22
Bossier City LEP Population – Other Languages	23
Caddo Parish LEP Population – Spanish or Spanish Creole	24
Shreveport LEP Population – Spanish or Spanish Creole	25
Caddo Parish LEP Population – Asian / Pacific Island Languages	26
Shreveport LEP Population – Asian / Pacific Island Languages	27
Caddo Parish LEP Population – Other Languages	28
Shreveport LEP Population – Other Languages	29
Low Literacy Population in the Planning Area	30
Agency Self – Assessment	31

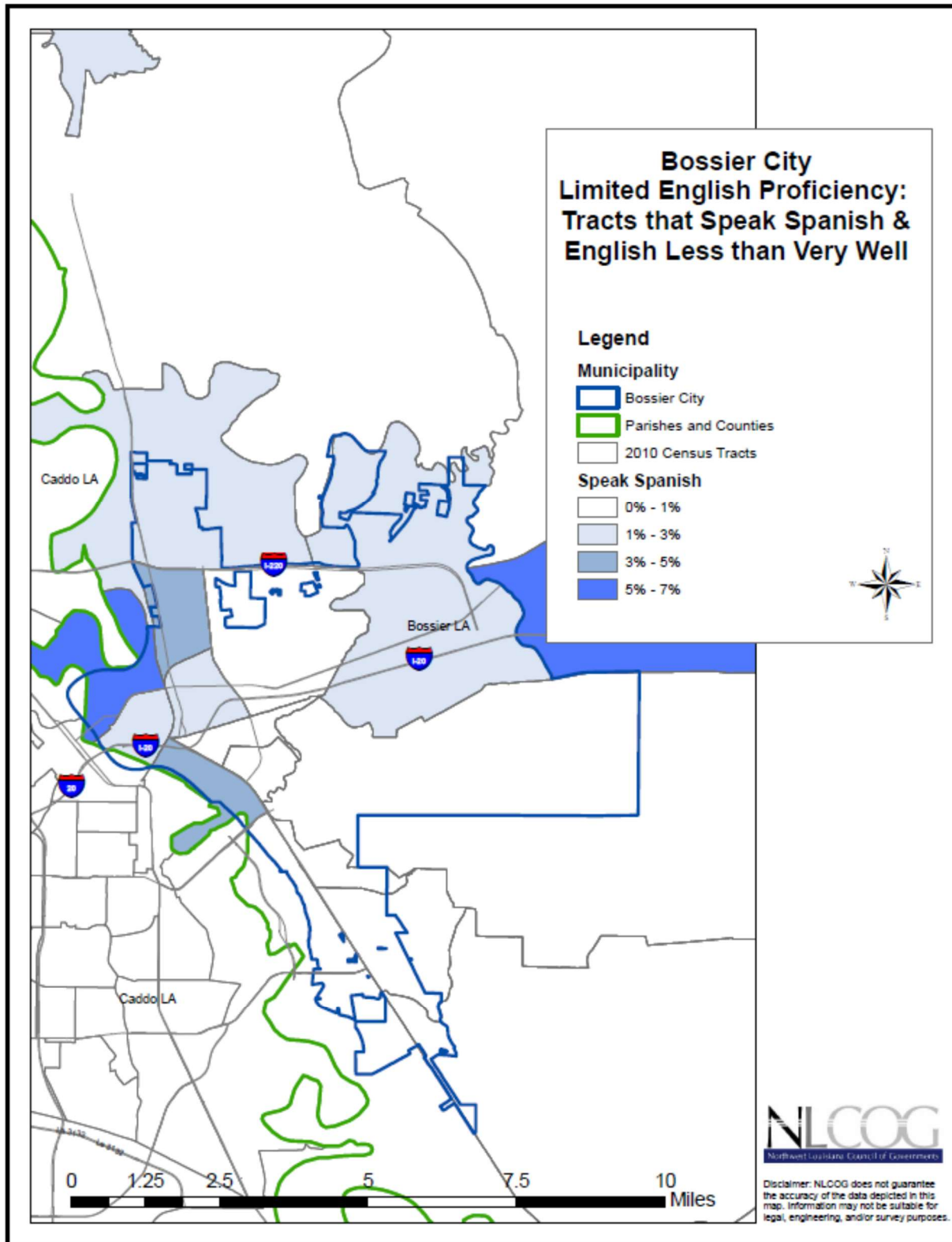
Limited English Proficiency in the Planning Area



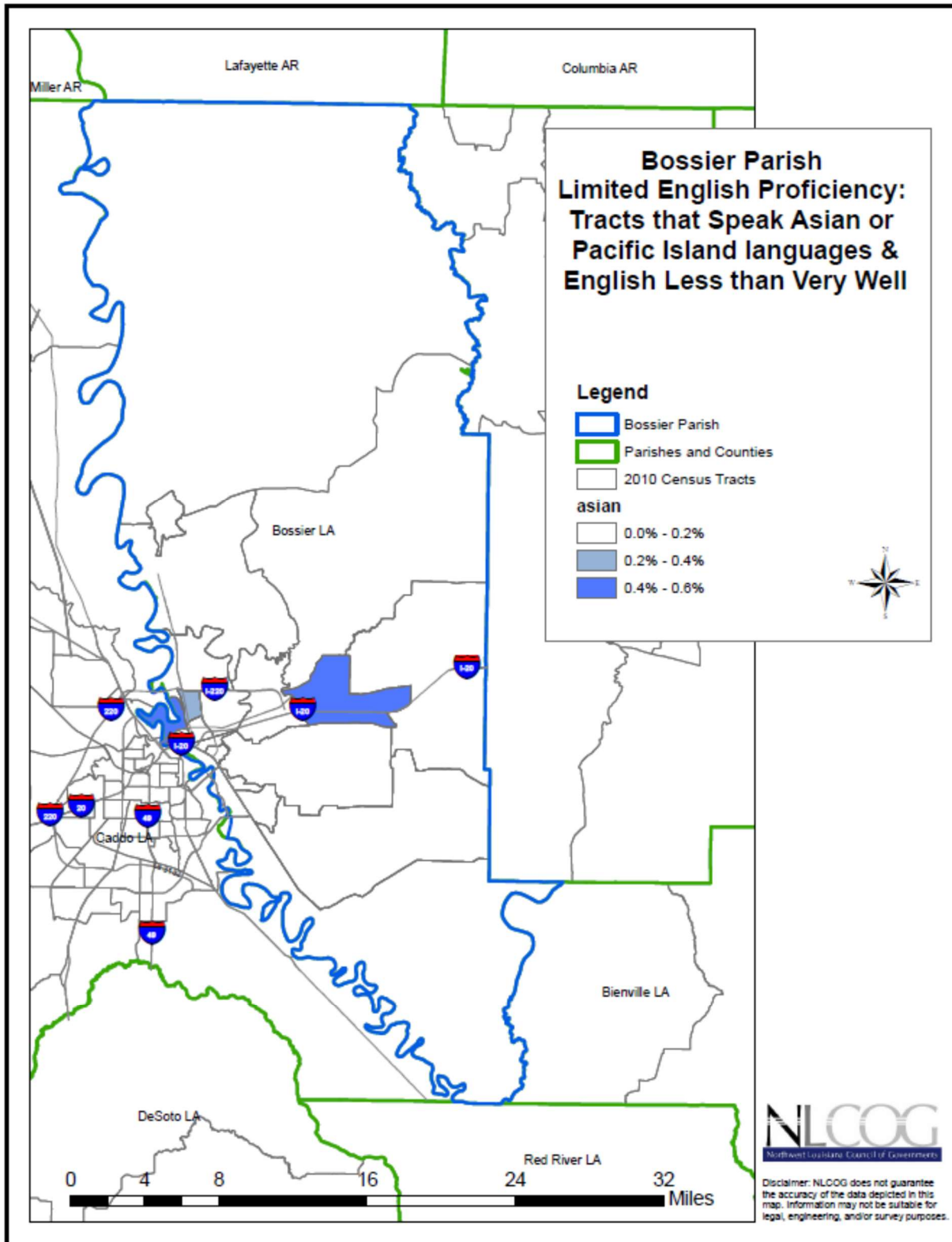
Bossier Parish LEP Population – Spanish or Spanish Creole



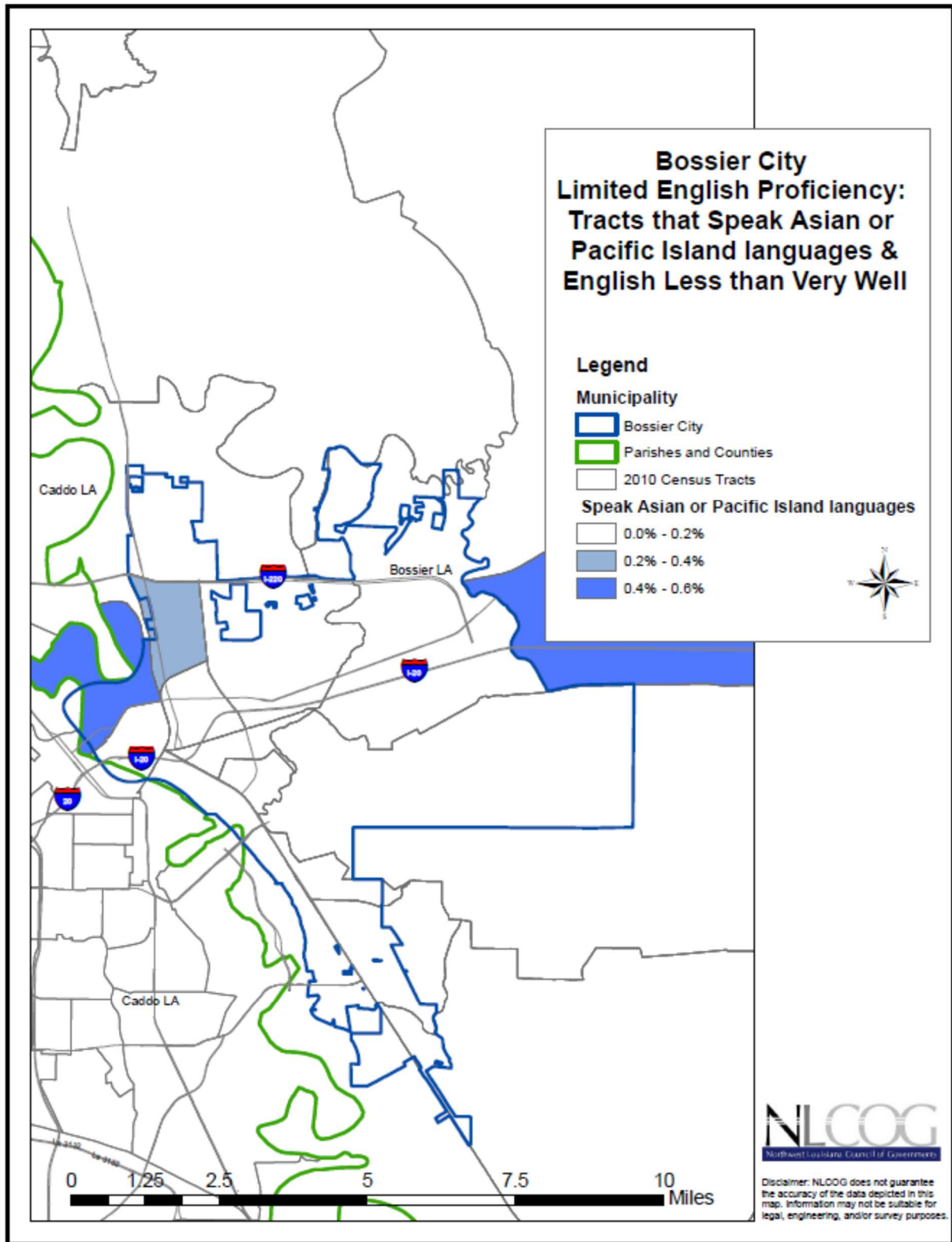
Bossier City LEP Population – Spanish or Spanish Creole



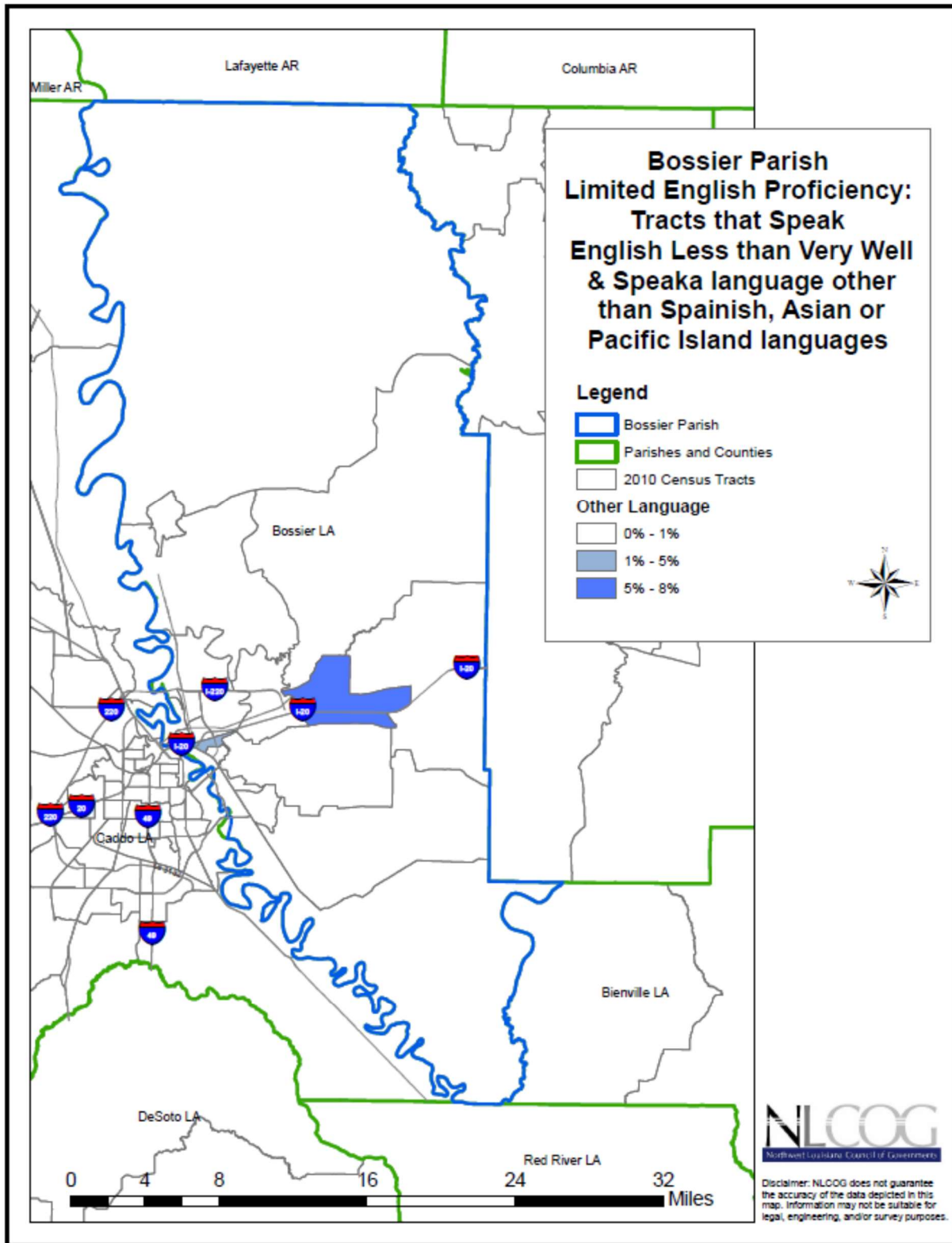
Bossier Parish LEP Population – Asian / Pacific Island Languages



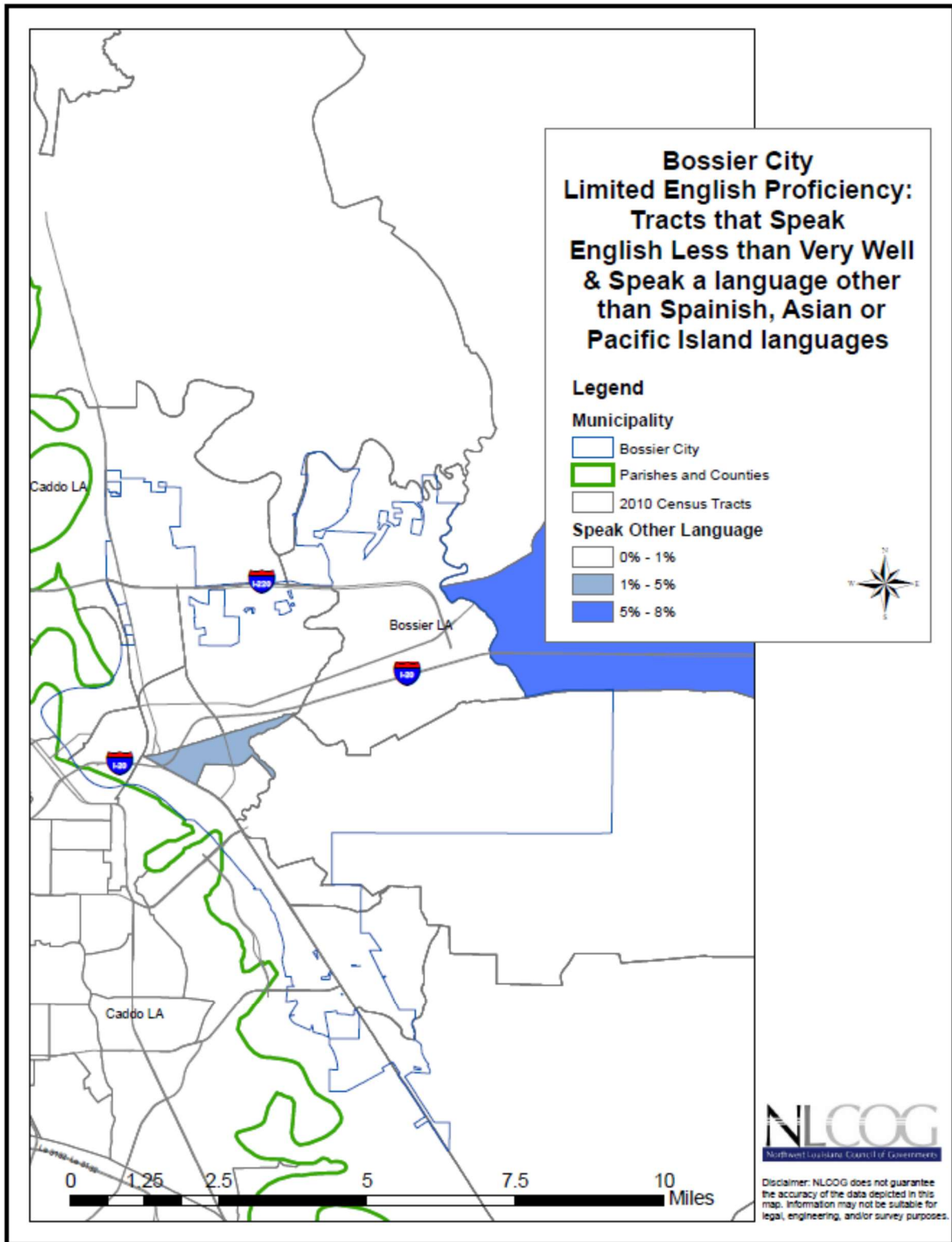
Bossier City LEP Population - Asian / Pacific Island Languages



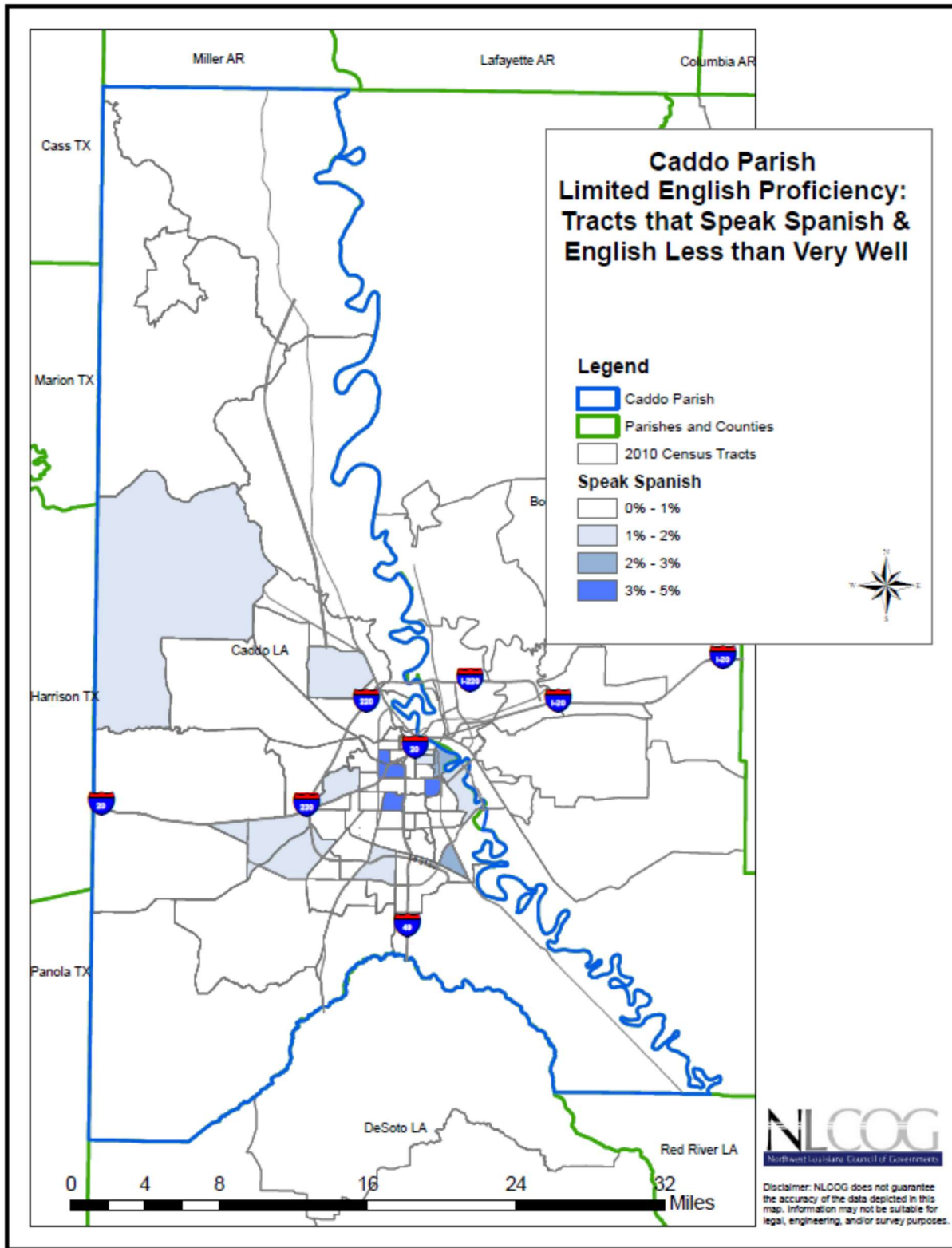
Bossier Parish LEP Population - Other Languages



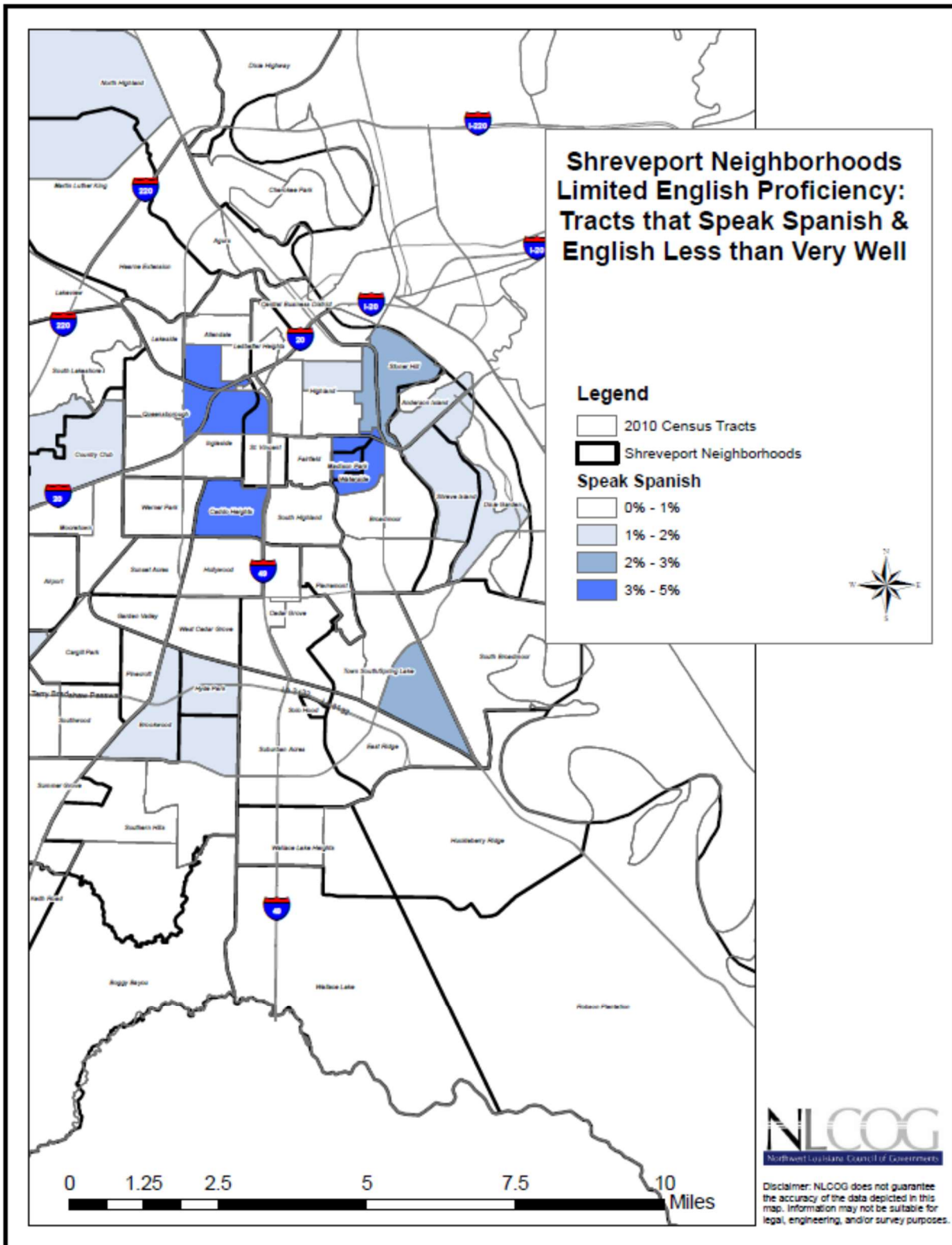
Bossier City LEP Population - Other Languages



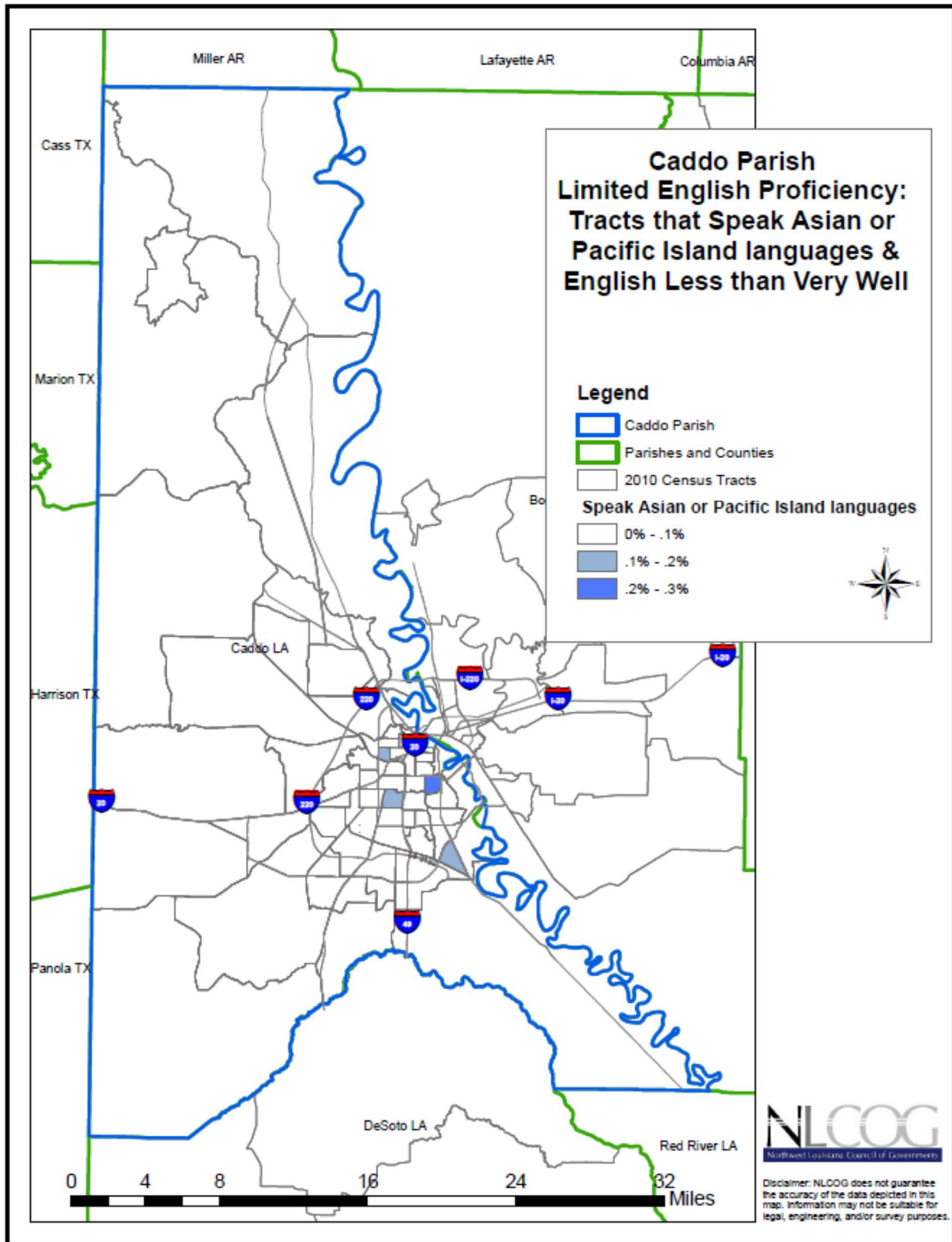
Caddo Parish LEP Population – Spanish or Spanish Creole



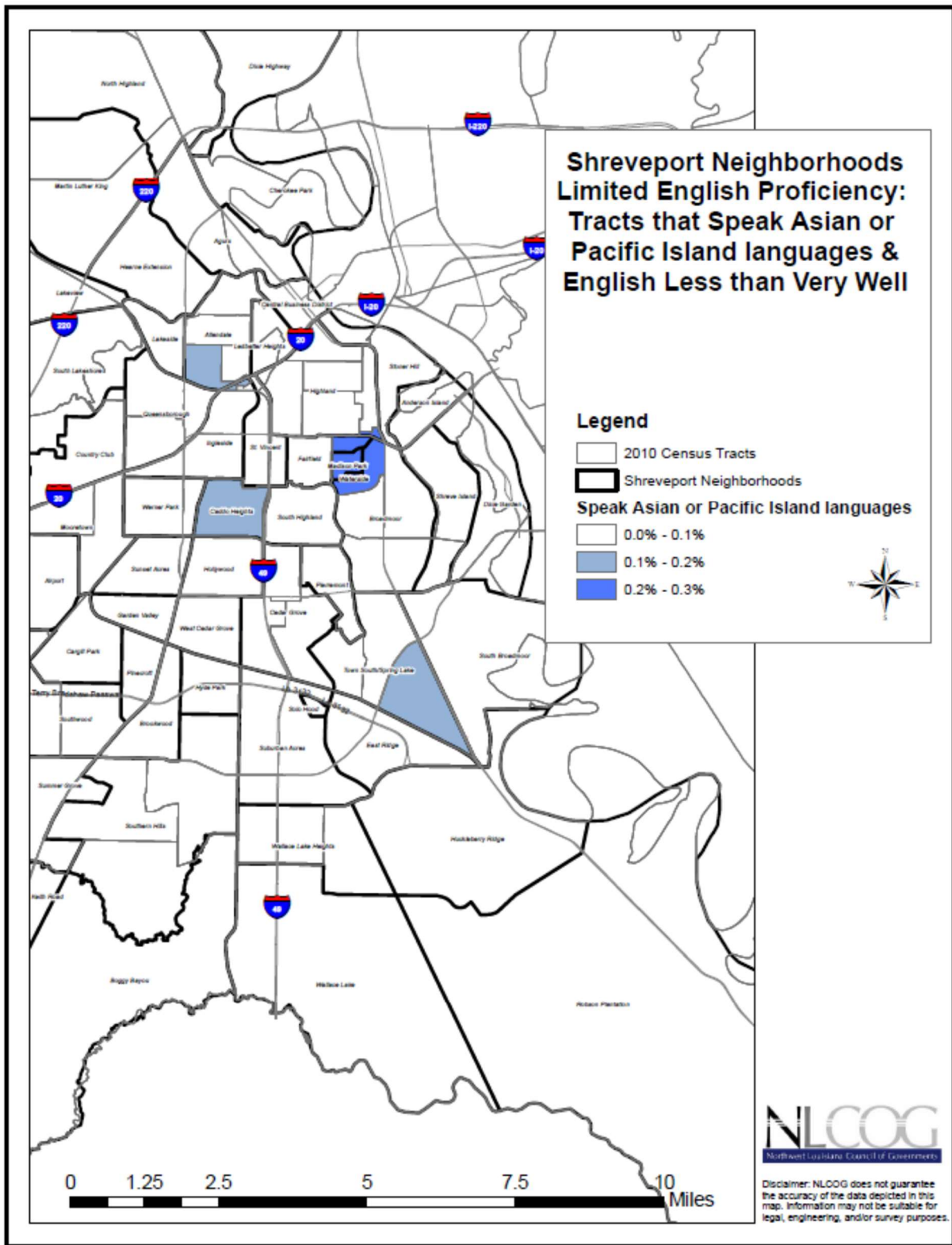
Shreveport LEP Population – Spanish or Spanish Creole



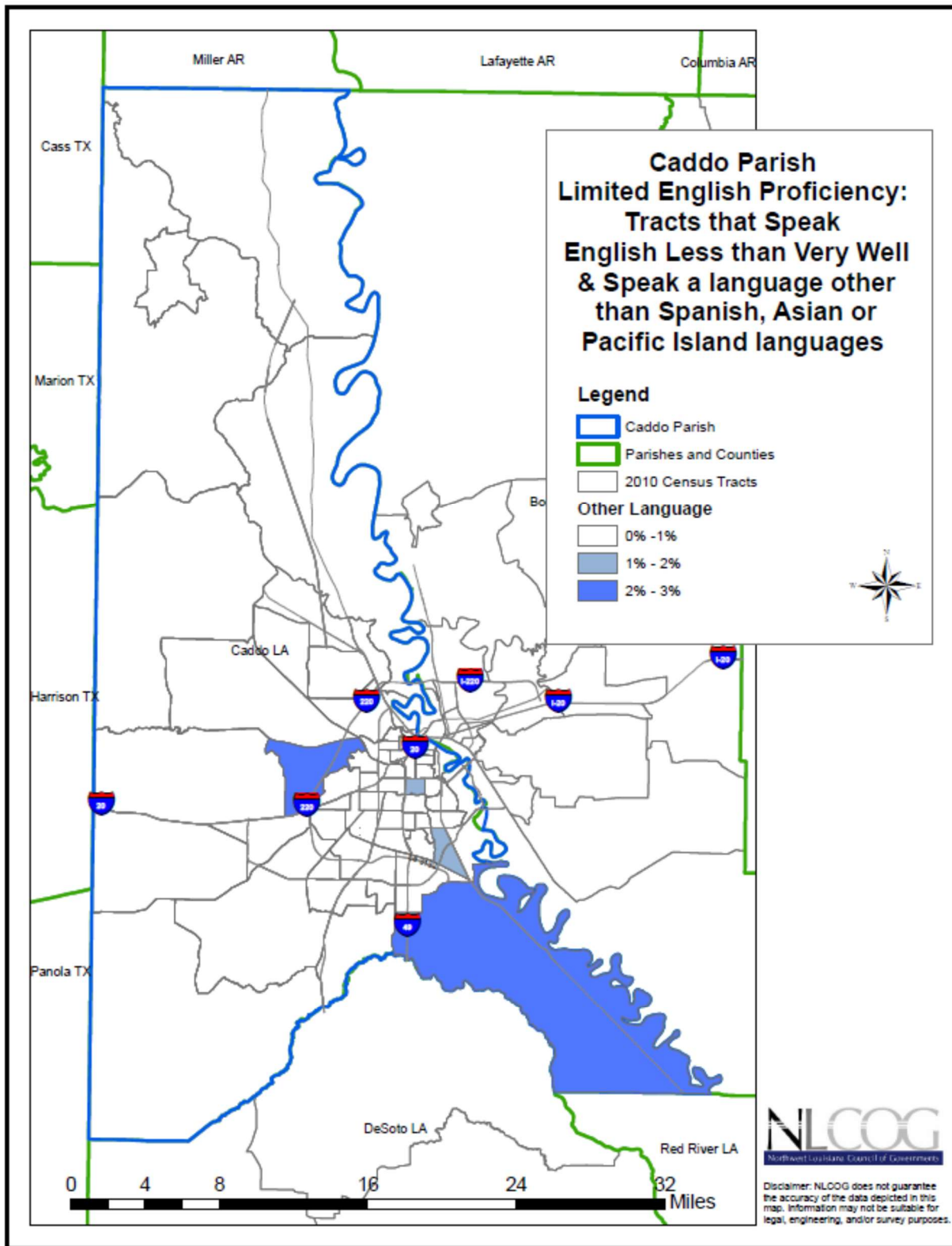
Caddo Parish LEP Population - Asian / Pacific Island Languages



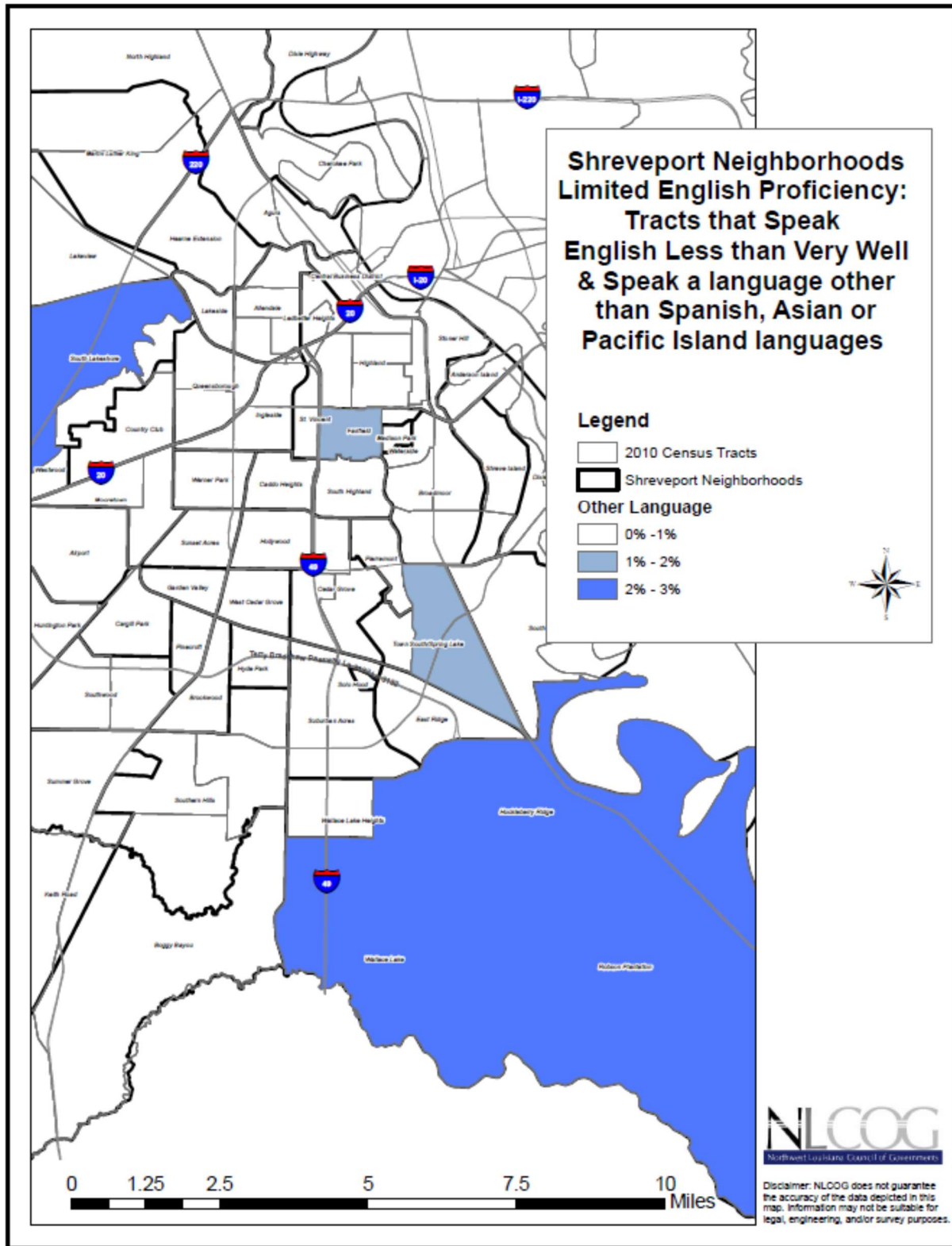
Shreveport LEP Population – Asian / Pacific Island Languages



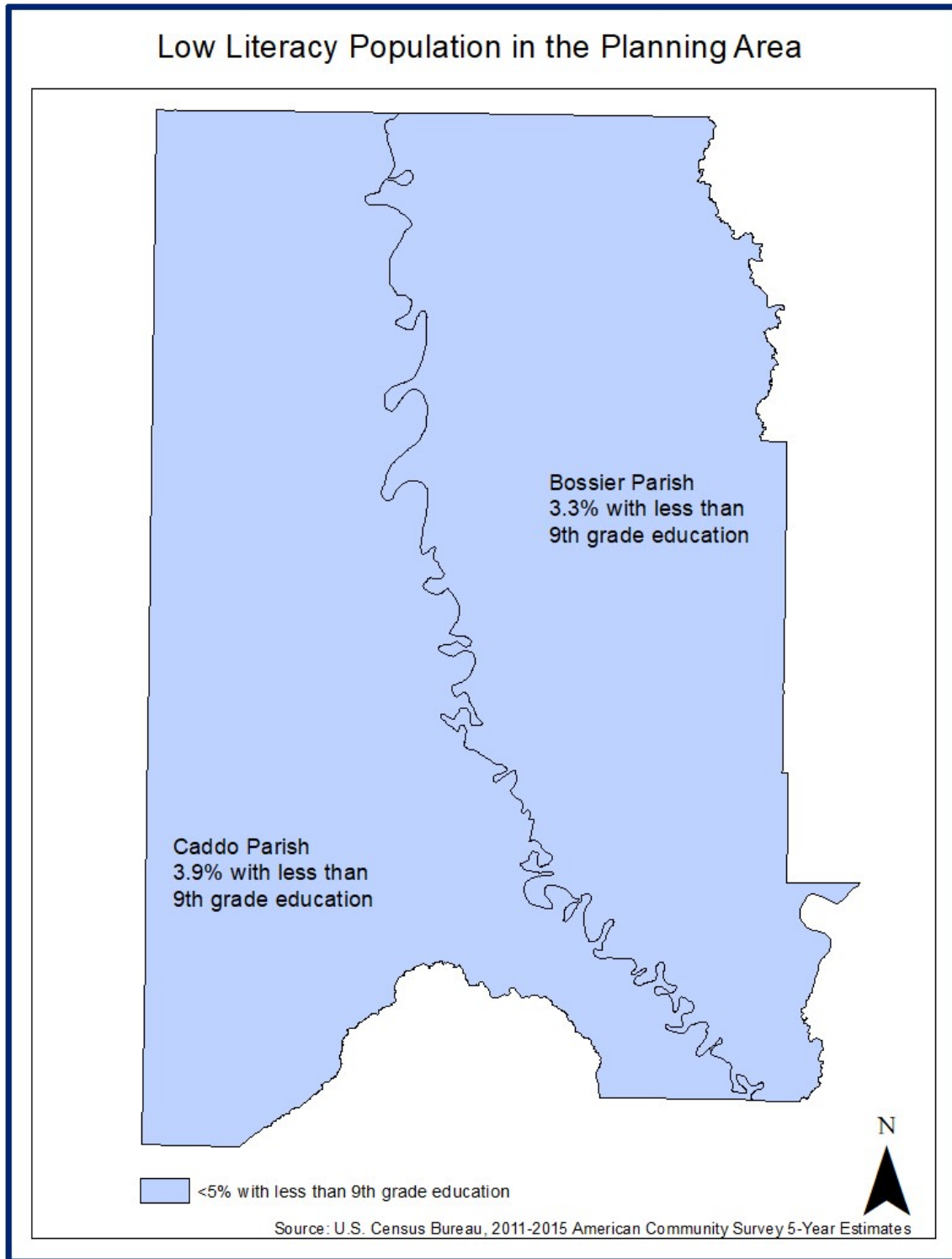
Caddo Parish LEP Population - Other Languages



Shreveport LEP Population - Other Languages



Low Literacy Population in the Planning Area



Agency Self – Assessment

A. Understanding How LEP Individuals Interact with Your Agency

The following series of questions helps agencies understand how an LEP individual may come into contact with your agency:

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with LEP individuals?
 Yes No
2. Please describe the manner in which your agency interacts with the public or LEP individuals:
 In-person Telephone E-mail / website
 Correspondence Other _____
3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.)
 Yes No
4. If your agency does provide federal financial assistance to non-federal entities:
 - a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?
 Yes No
 - b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services? Yes No
 - c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?
 Yes No

B. Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your agency identify LEP individuals? (Select all that apply)
 Assume LEP if communication seems impaired
 Respond to individual requests for language assistance services
 Self-identification by non-English/LEP speaker
 Ask open-ended questions to determine language proficiency on the phone or in person
 Use of “I Speak” language identification cards

- Based on written material submitted to the agency (e.g. complaints)
- We have not identified non-English speakers/LEP individuals
- Other (Please specify) _____

2. Does your program have a process to collect data on:
- a. The number of LEP individuals that you serve? Yes No
 - b. The number of LEP individuals in your service area? Yes No
 - c. The number and prevalence of languages spoken by LEP individuals in your service area? Yes No

3. How often does your agency assess the language data for your service area?
- Annually Biannually Not sure Other _____

4. What data does your agency use to determine the LEP communities in your service area? (Select all that apply)
- Census U.S. Dept. of Education U.S. Dept. of Labor
 - State Agencies Community Organizations Intake Information
 - Other _____

5. Do you collect and record primary language data from individuals when they first contact your programs and activities? Yes No

6. If you collect and record primary language data, where is the information stored?
- _____

7. What is the total number of LEP individuals who use or receive services from your program each year?
- _____

8. How many LEP individuals attempt to access your programs or services each month?
- _____

9. How many LEP individuals use your programs or services each month?
- _____

10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).

Language:	Frequency of Encounters
1. _____	1. _____
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____
5. _____	5. _____

C. Providing Language Assistance Services

The following set of questions will help you assess how well your agency is providing language assistance services to LEP individuals:

1. Does your agency currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?
 Yes No
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)
 Primary language of persons encountered/served
 Use of language assistance services such as interpreters and translators
 Funds or staff time spent on language assistance services
 Number of bilingual staff
 Cost of interpreter services
 Cost of translation of materials into non-English languages
 Other _____
3. Does your agency have a system to track the cost of language assistance services?
 Yes No
4. What types of language assistance services does your organization provide? (Select all that apply)
 Bilingual staff
 In-house interpreters (oral)
 In-house translators (documents)
 Contracted interpreters
 Contracted translators
 Volunteer interpreters or translators
 Telephone interpretation service
 Video interpretation service
 Interpreters or translators borrowed from another agency
 Language bank or dedicated pool of interpreters or translators
 Other _____
5. Does your agency:
 - a. Have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals?
 Yes No
 - b. Does the process include use of standardized language proficiency exams?
 Yes No
6. Does your agency ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret? Yes No
7. Does your agency have contracts with language assistance service providers (in-person interpreters, telephone interpreters, video interpreters, or translators)?

Yes No

8. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?

Yes No

9. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area? Yes No

10. Which vital written documents has your agency translated into non-English languages?

- Consent forms Complaint forms Intake forms
 Notices of rights Notices of disciplinary action
 Notices of denial, loss or decrease in benefits / services
 Applications to participate in programs or activities or to receive benefits or services
 Other _____

11. Does your agency translate signs or posters announcing the availability of language assistance services? Yes No

12. When your agency updates information on its website, does it also add that content in non-English languages? Yes No

D. Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receives appropriate training on your language access policies and procedures:

1. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals? Yes No

2. Who receives staff training on working with LEP individuals? (Select all that apply)

- Management or senior staff
 Bilingual staff
 New employees
 Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals
 All employees
 Volunteers
 Other _____
 None of the above

3. Are language access policies and LEP issues included with mandatory training curriculum for staff? Yes No

4. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals? Yes
 No

5. Does staff receive periodic training on how to obtain and work with interpreters?
 Yes No

6. Does staff receive periodic training on how to request the translation of written documents into other languages? Yes No
7. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics? Yes No
8. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter? Yes No

E. Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)
 - Frontline and outreach multi-lingual staff
 - Posters in public places
 - Website
 - "I Speak" language identification cards distributed to staff
 - Social networking website (e.g. Facebook, Twitter)
 - E-mail to individuals or a list serv
 - Other _____
 - None of the above
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services? Yes No
3. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)? Yes No
4. Does your agency inform community groups about the availability of free language assistance services for LEP individuals? Yes No
5. Does your agency inform current applicants or recipients about the availability of free language assistance services for LEP individuals? Yes No
6. Does the main page of your agency website include non-English information that would be easily accessible to LEP individuals? Yes No
7. Does your agency have multi-lingual signs or posters in its offices announcing the availability of language assistance services? Yes No

F. Monitoring and Updating Language Access Procedures, Policies and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access procedures, policies, and plan:

1. Does your agency have a written language access policy? Yes No

2. If so, is a description of this policy available to the public? Yes No
3. How often is your agency's language access policy reviewed and updated?
 Annually Biannually Not sure Other _____
4. When was the last time your agency's language access policy was updated?
Date _____
5. How often does your agency update its data on the LEP communities in your service area?
 Annually Biannually Not sure Other _____
6. Does your agency have a language access coordinator? Yes No
7. Does your agency have a formal language access complaint process?
 Yes No
8. Has your agency received any complaints because it did not provide language assistance services? Yes No
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing? Yes No
10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?
 Yes No

The Northwest Louisiana Council of Governments is an intergovernmental association of local governments established to assist in planning for common needs, cooperating for the mutual benefit, and coordinating for sound regional development. NLCOG's purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions for the benefit of the entire Northwest Louisiana community. This is achieved by developing and implementing constructive and workable policies and programs for solving area-wide problems. These issues include, but are not limited to, matters affecting transportation, economic, health, safety, welfare, education, and regional development issues.

NLCOG is funded by a variety of funding sources including federal grants from the U. S. Department of Transportation's Federal Highway Administration, and Federal Transit Administration, the Louisiana Department of Transportation and Development, as well as by NLCOG's local member governments.



625 Texas Street, Suite 200
Shreveport, LA 71101
318.841.5950
www.nlcog.org