

COMMUNITY OPTIONS LIMITED ENGLISH PROFICIENCY (LEP) PLAN

INTRODUCTION

This Limited English Proficiency (LEP) Plan, for Community Options has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person shall “on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for Community Options has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

POLICY

Community Options falls under the Safe Harbor Provision which states, “..If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.” Community Options does have access to competent translators and does not hesitate to utilize their services at meetings with families, public forums etc. to explain the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP). Community Options will utilize these processes to assist persons with limited English proficiency to participate in the transportation planning and utilization process. (Please see Factor I below).

LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have with LEP persons in providing transit services. Each of these elements is addressed below.

Factor 1. Number and Percentage of LEP Persons in Our Programs

COI offers transportation services to approximately 200 adults and is paid for through Medicaid. The population of Montrose County is approximately 42,000 people and there are about 2,256 Spanish speaking individuals who speak English less proficiently which is roughly 5.4% of the overall population. Delta County has a total population of 31,162 (July, 2019) and reports 9.6% of the population speaks a

language other than English in the household. Any recipients of transportation services receive interpretation services as needed and upon request. COI has several staff who are bi-lingual and will step in to assist with interpretation as necessary.

Factor 2 & 3 Nature, Frequency and Importance of LEP Contact

Frequency of Contact

As people receiving services enter into our system, the Intake Manager is charged with determining eligibility. The assigned Case Manager then offers services to the individual based on the needs of that person. During this initial process, it becomes apparent which of our clients are in need of language support in Spanish. Upon request, we would secure appropriate interpreters through our Spanish speaking staff or other means.

Importance of Contact

The population we currently serve has been fairly static over recent years so our knowledge of those in need of interpretation are well known and we have always handled the situation appropriately. Many of our clientele do not possess verbal language abilities and therefore need to be communicated with through other means; sign language, body language or gesturing along with verbal engagement.

Factor 4. Resources Available for LEP Outreach

Community Options makes every effort to notify our constituency who are Spanish-speaking of the availability of free interpretation services, upon request, for non-vital but important documents and information.

LANGUAGE ASSISTANCE PLAN

The Community Options plan is designed to be responsive to the needs of our constituents within the Safe Harbor exception and thus will always be viewed as a work in progress. It will be important to monitor changes in demographics and thus a need for changes in our services. Community Options will update the LEP as required by the U.S. Department of Transportation. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of individuals who are LEP are present in our service population.

Monitoring and Updating Plan

Community Options will monitor and update its plan every 3 years, or as population demographics change substantially to warrant an update. This will include:

- Review the demographics of the population served by COI.
- Review our LEP Plan and make adjustments, as needed.

Disseminating Our LEP Plan

- The Community Options Board of Directors has adopted this plan.
- The plan, within the Safe Harbor requirements, will be posted on the COI website, Allison Administration Building and both day program locations.