

Limited English Proficiency Plan for  
Adams County, Nebraska

## I. Purpose and Authority

The purpose of this limited English proficiency policy is to clarify the responsibilities of the Adams County departments receiving federal financial assistance and to assist them in fulfilling their responsibilities to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. This policy was prepared in accordance with Title VI of the Civil Rights Act of 1964; 42 U.S.C. §2000d *et seq.*, and its implementing regulations (prohibiting national origin discrimination by recipient of federal financial assistance). This plan also serves to show Adams County's commitment to ensure meaningful access to all Adams County programs by persons with Limited English Proficiency (LEP).

## II. General Policy Statement

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

## III. Plan Summary

Definition of Limited English Proficiency (LEP) persons: LEP persons are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.

Adams County has developed this Limited English Proficiency Plan to help identify reasonable steps to ensure LEP persons meaningful access to Adams County programs. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and the information for future plan updates.

To decide what reasonable steps Adams County departments should take to ensure meaningful access for LEP persons, Adams County considers the following:

1. The number of proportion of LEP persons eligible to be served or likely encountered by Adams County program, activity or service;

Adams County and Adams County departments will use various methods to identify LEP persons with whom they have contract. These may include:

Current and past experiences with LEP persons encountered by the department's staff. The number and type of such encounters will be periodically analyzed to determine the scope of the language services required.

Most recent U.S. Census Bureau data. Adams County and Adams County departments shall analyze data from the most recent U.S. Census Bureau data regarding languages spoken in Adams County as well as those who self-identified that they spoke English less than "very well".

Adams County has examined the U.S. Census Bureau's Quick Facts Data last revised March of 2013 and Modern Language Data for Adams County, Nebraska and was able to make the following approximations:

7.5% of the Adams County population age 5 and older speak a language other than English at home.

People speaking Spanish at home comprised the largest language group speaking a language other than English. The next predominate language besides English and Spanish was Vietnamese. Other languages at a very small percentages of the population spoke Chinese, French, German, Hebrew, Italian, Japanese, Korean, Laotian, Serbo-Croatian all being less than 0.5% of the population speaking a language other than English.

2. The frequency with which LEP individuals come in contact with the Adams County program, activity or service;

In addition to research conducted to identify LEP persons in Adams County, Adams County departments shall also annually compile information regarding the frequency of contact with LEP persons. The more frequent the contact and or the number of requests for other languages other than English, the more likely that language services for a specific language will be needed. Actions taken for a department that serves a LEP person one time or occasionally will be different from those that serve LEP persons every day. Adams County departments will assess the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone requests and in person inquires for LEP assistance or materials, requests for language interpreters or translated material, and may include surveying public meeting attendees.

3. The nature and importance of the program, activity or service provided by Adams County and;

Adams County recognizes that within the range of programs and services it provides, the nature of some programs and services may be more important to LEP persons than

others. It is Adams County's intent to provide meaningful access to all participants and eligible persons, however, the availability of resources may limit the provision of language services in some instances and in some departments.

4. The resources available to Adams County and overall costs.

Adams County departments shall assess their available resources that could be used for providing LEP assistance. This shall include identifying what staff and volunteer language interpreters are readily available; how much a professional interpreter and translation service would cost; which documents should be translated; which organizations the department could partner with for interpreter and translation services or outreach efforts; which financial resources could be used to provide assistance; and what level of staff training is needed.

#### IV. How To Identify An LEP Person Who Needs Language Assistance

Below are tools that may be used by Adams County departments to help identify persons who may need language assistance.

When records are normally kept of past interactions with members of the public, the language of an LEP person may be included as part of the record.

Have language identification cards or Census Bureau "I speak cards" at all departments in Adams County which invite LEP persons to identify their language needs to staff. While staff may not be able to provide translation assistance at the initial contact with an LEP person, the cards are an excellent tool to identify language needs for future contacts.

Posting notices in commonly encountered languages notifying LEP persons of language assistance to encourage LEP to self-identify.

#### V. Language Assistance Measures

When an interpreter is needed, in person or on the telephone, staff should first determine what language is required. Staff may be able to assist with written communications for LEP persons. If staff cannot, private interpreter services can provide translation services for a fee.

Use of informal interpreters, such as family or friends of the LEP person seeking service, or other customers, is discouraged, with minor children generally prohibited from acting as interpreters. The use of informal interpreters shall be allowed at the insistence of the LEP person or in emergencies, but shall be documented.

No staff may suggest or require that an LEP person provide an interpreter in order to receive services.

## VI. Staff Training

All staff will be provided with the LEP Plan and will be educated on procedures and services available. LEP Plan information will also be a part of the staff orientation process for new employees. Training topics may include the following:

Adams County LEP policy and procedures;

Understanding Title VI LEP responsibilities;

What language assistance services Adams County has available;

Use of LEP language identification cards or “I speak cards”;

How to use language interpretation and translation services and which services are available;

Documentation of language assistance requests;

How to handle a complaint

## VII. Providing Notice of Available Language Services to LEP Persons

Posting signs that language assistance is available in public areas and each department.

Statements may be placed in outreach documents indicating that language services are available from Adams County. Such statements could be placed in announcements, brochures, booklets, fliers, notices, advertisements, agendas, recruitment information and on the Adams County website.

When running a general public meeting notice, staff should insert a clause in Spanish which asks persons who need Spanish language assistance to make arrangements with the Adams County Clerk within two days of the public meeting.

If a Adams County department is presenting a topic that could be of potential importance to an LEP person or if a Adams County department is hosting a meeting or workshop in a geographic location with a known concentration of LEP person, the department may have notices, fliers, advertisements and agendas printed in an alternative language or provide notices on non-English language radio stations or media outlets about the available language assistance services and how to get them.

## VIII. Providing Notice of Available Language Services to LEP Persons

Adams County and Adams County departments will reevaluate the LEP Plan on a regular basis. Consideration shall be given to changes in demographics, types of services, or other needs when determining the frequency of LEP Plan reevaluation. Each affected department is encouraged to maintain its own LEP Plan that is more specific to its operational needs.

Each reevaluation should examine all Plan components and assess the following:

How many LEP persons were encountered and what language?

Were their needs met?

What is the current LEP population in Adams County?

Has there been a change in the types of languages where translation services were needed?

Is there still a need for continued language assistance for previously identified programs? Are there other programs that should be included?

Has Adams County's or a specific department's available resources, technology, staff and financial costs changed?

Has Adams County or a specific department fulfilled the goals of the LEP Plan?

Were complaints received?

Are identified sources of assistance still available and viable?

## IX. Dissemination of the Adams County Limited English Proficiency Plan

Adams County will post the LEP Plan on its website at [www.adamscounty.org](http://www.adamscounty.org). Copies of the LEP Plan will be provided to any person or agency requesting a copy. Any questions or comments regarding this LEP Plan should be directed to the Adams County Title VI Coordinator.

## X. Complaints

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. As a recipient of federal financial assistance, Adams County, Nebraska has in place a Title VI complaint procedure.

1. Any person who believes that he or she, individually, as a member of any specific class, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990,

Section 504 of the Vocation Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Adams County. A complaint may also be filed by a representative on behalf of such a person. All Title VI complaints will be referred to Adams County's Title VI Coordinator for review and action.

2. Complaints must be in writing and contain as much information as possible about the alleged discrimination. Adams County has a Complaint Form to be used for the convenience of the complainant. The written complaint should include:
  - a) Complaint's name, address and telephone number
  - b) A detailed description of the issues
  - c) Name and job titles of individuals perceived as parties in the complaint

Complaints received by telephone will be reduced to writing and provided to complainant for confirmation or revision, and signature processing.

3. Complaint forms can be found at [www.adamscounty.org](http://www.adamscounty.org) or by contacting the Adams County Title VI Coordinator.
4. A complaint should be filed as soon as possible but must be no later than 180 calendar days after the complainant becomes aware of the alleged discrimination, unless the time for filing is extended by the designated agency for good cause shown.
5. The Adams County Title VI Coordinator, or Investigator, will contact the complainant to:
  - a) Acknowledge receipt of the complaint by the investigator
  - b) Confirm that the complainant wishes to go forward with the complaint
  - c) Confirm that there are allegations that need to be investigated and resolved
  - d) Gather additional facts and further clarify the complaint
6. An Investigator will review and investigate the complaint. As part of the review, the investigator will, at minimum:
  - a) Gather relevant documentation from the complainant not included in the complaint
  - b) Contact complainant to arrange and conduct interview, if needed
  - c) Maintain log of all activities associated with complaint

The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

## LIMITED ENGLISH PROFICIENCY PLAN

### LANGUAGE SERVICES COMPANIES

- 1) TTY: 402-461-7166
- 2) On-Call Interpreter Program
- 3) AT&T Language Assistance Line  
800/523-1786