

Jefferson County Office of Community Services & Workforce Development

Limited English Proficiency (LEP) Plan

I. PLAN STATEMENT

The Jefferson County Office of Community **Services & Workforce Development** utilizes this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines, the **Jefferson County Office of Community Services & Workforce Development** will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for its services and programs.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

Meaningful access is free language assistance in accordance with federal guidelines. The **Jefferson County Office of Community Services & Workforce Development** will periodically assess and update the following four-factor analysis, including but not limited to:

- a. The number or proportion of LEP persons eligible to be served or likely to be encountered by the **Jefferson County Office of Community Services & Workforce Development**:

The threshold for triggering LEP compliance is at least 5% LEP population or more than 1,000 persons. For determining the LEP population in Jefferson County, Alabama, the Office of **Community Services & Workforce Development** utilized U.S. Census Bureau Language Spoken at Home from the 2017 American Community Survey 5- year estimate (attached). Based on this estimate, there are approximately 2.45% of the Jefferson County population 5 years and over who speak English less than “very well.”

LANGUAGE SPOKEN AT HOME	
Population 5 years and over	616,677
English only	580,347
Language other than English	36,330
Speak English less than “very well”	15,127
Spanish or Spanish Creole	20,651
Speak English less than “very well”	10,085
Other Indo-European languages	5,976

Speak English less than “very well”	1,656
Asian and Pacific Islander languages	6,015
Speak English less than “very well”	2,466
Other languages	3,688
Speak English less than “very well”	920

Note: Data for the City of Hoover does not differentiate between Jefferson and Shelby County.

2. The frequency with which LEP persons using a particular language other than English come into contact with the Office of **Community Services & Workforce Development**:

Historically the Office of **Community Services & Workforce Development** has found few instances where persons using a particular language other than English come into contact with the Office of **Community Services & Workforce Development**. The primary contact was found on construction sites for multi-family housing development. To encourage contact, Office of **Community Services & Workforce Development** has begun to advertise housing bids and public notices in Latino News – Alabama which is a Hispanic publication.

3. The nature and importance of the Office of **Community Services & Workforce Development** program activity or service to the persons’ life is as follows:

- a) The County’s Objectives are to foster neighborhood stability, to utilize U.S. Department of Housing and Urban Development funds for physical improvements and housing rehabilitation; to encourage business development and jobs; and to foster increased housing production and home ownership for families at all income levels.

- b) The projected use of funds for a given program year is developed so as to give maximum feasible priority to activities which will benefit low-and moderate income families or aid in the prevention or elimination of slums and blight. In addition, the projected use of funds is consistent with the County’s established strategy of stabilizing the County and reversing negative trends associated with decay and blight.

- c) The County’s strategy for community development has three basic goals:

- 1) To encourage neighborhood stability through physical improvements and housing rehabilitation.

- 2) Improve the economic life of the County by encouraging business development and jobs.

3) Foster increased production and home ownership for families at all income levels. The County intends to continue its efforts to obtain available federal, state, local and private funding to provide for community wide improvements in each of the areas outlined above in as many communities and neighborhoods as funding permits.

All HUD programs are geared toward these objectives and outcomes and to that end, these programs and activities are highly important. Additionally, it is important that information relating to these programs is available in a reasonable manner to all citizens, particularly those with Limited English Proficiency.

4. The Office of **Community Services & Workforce Development**'s resources and the cost of providing meaningful access: Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits. Resources are always limited but are better discussed in the sections below.

III. LANGUAGE ASSISTANCE

1. 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 Office of **Community Services & Workforce Development** programs and activities.
2. Language assistance includes interpretation, which means oral or spoken transfer of a message from one (1) language into another language and/or translations, which means the written transfer of a message from one (1) language into another language. The Office of **Community Services & Workforce Development** will determine when interpretation and/or translation are needed and are reasonable.
3. Office of **Community Services & Workforce Development** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and the Office of **Community Services & Workforce Development** determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, the Office of **Community Services & Workforce Development** will make reasonable efforts to provide free language assistance. If reasonably possible, the Office of **Community Services & Workforce Development** will provide the language assistance in the LEP client's preferred language.

The Office of **Community Services & Workforce Development** has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

The Office of **Community Services & Workforce Development** will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

IV. TRANSLATION OF DOCUMENTS

1. The Office of **Community Services & Workforce Development** will weigh the cost and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information; the likelihood of frequent changes in documents; the existence of multiple dialects within a single language group; the apparent literacy rate in a LEP group and other relevant factors. The Office of **Community Services & Workforce Development** will undertake this examination when an eligible LEP group constitutes five (5) percent of an eligible client group.
2. If the Office of **Community Services & Workforce Development** determines that translation is necessary and appropriate, the Office of **Community Services & Workforce Development** will arrange to translate the appropriate document(s) and selected mailings and document(s) of vital importance into that language.
3. As opportunities arise, the Office of **Community Services & Workforce Development** may work with other entities to share the costs of translating common documents, which may include language groups, which do not (yet) reach the threshold level in the Office of **Community Services & Workforce Development's** client population.
4. The Department of Housing and Urban Development (HUD) should provide prototype translations of standard housing documents in multiple languages in a timely fashion. HUD should provide this service to Office of **Community Services & Workforce Development** and the hundreds or thousands of other HUD grantees whose limited resources hinder their LEP efforts.
5. The Office of **Community Services & Workforce Development** will consider technological aids such as Internet-based translation services, which may provide helpful, although perhaps not authoritative, translations of written materials.

V. FORMAL INTERPRETERS

1. When necessary to provide meaningful access for LEP clients, the Office of **Community Services & Workforce Development** will provide qualified interpreters, contract vendors, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.

2. The Office of **Community Services & Workforce Development** may require a formal interpreter to certify to the following:
 - a. The interpreter understood the matter communicated and rendered a competent interpretation.
 - b. The interpreter will not disclose non-public data without written authorization from the client.
3. A Office of **Community Services & Workforce Development** contract interpreter may not be a subordinate to the person making the decision.
4. Bilingual Office of **Community Services & Workforce Development** employees, when available, can provide limited assistance to Office of **Community Services & Workforce Development** staff and LEP clients as part of their regular job duties.

VI. INFORMAL INTERPRETERS

1. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Office of **Community Services & Workforce Development** staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
2. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the Office of **Community Services & Workforce Development**. If possible, the Office of **Community Services & Workforce Development** should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
3. If an LEP client prefers an informal interpreter, after the Office of **Community Services & Workforce Development** has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
4. If an LEP client wants to use his or her own informal interpreter, the Office of **Community Services & Workforce Development** reserves the right to also have a formal interpreter present.

VII. OUTSIDE RESOURCES

1. Outside resources may include community volunteers.
2. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

VIII. MONITORING

1. The Office of **Community Services & Workforce Development** will review and revise this LEP Plan from time to time. The review will include:
 - a. Reports from the Office of **Community Services & Workforce Development's** respective divisions on the number of Office of **Community Services & Workforce Development** clients who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations.
 - b. Reports from the respective divisions and other sources listing the languages used by LEP clients.
 - c. A determination as to whether the number from the Office of **Community Services & Workforce Development** client group(s) speak a specific language, which triggers consideration of document translation needs as described above.
 - d. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.

IX. LEP PLAN DISTRIBUTION AND TRAINING

The LEP Plan will be:

1. Distributed to all Office of **Community Services & Workforce Development** staff.
2. Available at the Office of **Community Services & Workforce Development** Administrative Office at 716 Richard Arrington Jr. Blvd. N., Suite A-430, Birmingham, Al. 35203-0115.
3. Posted to the Jefferson County Commission's Website.
4. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.