

Limited English Proficiency Plan (LEP)

I. Purpose and Authority

The purpose of this Limited English Proficiency (LEP) policy is to clarify the responsibilities of Dallas County departments receiving federal financial assistance and to assist them in fulfilling their responsibilities to LEP persons. This plan also serves to show Dallas County's commitment to ensure meaningful access to all Dallas County programs by persons with limited English proficiency.

All Dallas County department heads or elected officials overseeing programs or activities receiving federal financial assistance must make a meaningful attempt to provide LEP persons with a means of effective communication.

II. General Policy Statement

It is the policy of Dallas County to provide timely meaningful access for LEP persons to all Dallas County programs and activities. Language assistance services shall be provided to persons with LEP whenever a person with LEP requests language assistance services, as set forth herein.

III. Limited English Proficiency Plan Summary

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

Dallas County has developed this Plan to help identify reasonable steps to ensure LEP persons meaningful access to Dallas 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 information for future plan updates.

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

1. The number or proportion of LEP persons eligible to be served or likely encountered by the Dallas County program, activity or service;
2. The frequency with which LEP individuals come in contact with the Dallas County program, activity or service;
3. The nature and importance of the program, activity or service provided by the County;
4. The resources available to Dallas County and overall costs.

Department heads and elected officials should create a record of language assistance services provided, which can assist in accurately identifying and addressing the changing needs of their LEP communities, which turn, can help identify changes to the quantity or type(s) of language assistance services.

A brief description of the above considerations is provided in the following section.

IV. Four Factors

1. Number or proportion of LEP persons eligible to be served or likely encountered by the Dallas County program, activity or service.

Dallas County and Dallas County departments will use various methods to identify LEP persons with whom they have contact. 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 breadth and scope of the language services required.
- Most recent U.S. Census Bureau data: Dallas County and Dallas County departments shall analyze data from the most recent U.S. Census Bureau data, regarding languages spoken in Dallas County as well as those who self-identified that they spoke English less than "very well".

Dallas County has examined the U.S. Census Bureau's American Community Survey data, 2011-2013 American Community Survey 3-Year Estimates, for Dallas County, Texas, and was able to make the following approximations:

- 41.3% of the Dallas County population age 5 and older speaks a language other than English at home. 19.5% of the population age 5 and older reported that they do not speak English very well.
- People speaking Spanish at home comprised the largest language group speaking a language other than English at home. 34.3% of the population age 5 and older speak Spanish at home. Of those, 16.9 % reported they do not speak English very well.
- 2.3% of the Dallas County population 5 and older speaks Other Indo-European languages at home. Of those, .6% reported they do not speak English very well.
- 1.2% of the population 5 and older speaks an unspecified or other language at home. Of those, .4% reported they do not speak English very well.

Additionally, Dallas County examined the U.S. Census Bureau Language Spoken At Home By Ability To Speak English For The Population 5 Years And Over, 2013 1-Year Estimates, for Dallas County, Texas and was able to make the following approximations:

- People speaking Spanish at home comprised the largest language group which indicated they do not speak English very well. Out of a population of 785,630 Spanish speakers (from a total Dallas County population of 2,286,371), 415,568 people speaking Spanish at home reported they do not speak English very well. This is approximately 18% of the Dallas County population.
 - People speaking Chinese at home comprised the second largest language group which indicated they do not speak English very well. Out of a population of 14,124 Chinese speakers (from a total Dallas County population of 2,286,371), 6,735 people speaking Chinese at home reported they do not speak English very well. This is approximately .02% of the Dallas County population.
2. Frequency with which LEP individuals come in contact with the Dallas County program, activity or service.

In addition to research conducted to identify LEP persons in Dallas County, Dallas 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. Dallas County departments will assess the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and in person inquiries for LEP assistance or materials, requests for language interpreters or translated material, and may include surveying public meeting attendees.

3. Nature and importance of the program, activity or service provided by the County. Dallas 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.
4. The resources available to Dallas County and overall costs.

Dallas 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 (see Attachment E-3); 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.

After analyzing the four factors, Dallas County developed the LEP Plan outlined in the following section for assisting LEP persons.

V. How To Identify An LEP Person Who Needs Language Assistance

Below are tools that may be used by Dallas County departments/elected officials to help identify persons who may need language assistance:

- Have language identification cards or Census Bureau “I speak cards” at customer service counters in Dallas County departments 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. Attachment E(2).

VI. Language Assistance Measures

When an interpreter is needed, in person or on the telephone, staff should first determine what language is required. Bilingual staff may be able to assist with communications with LEP persons. Each department should complete Form E-3 and return it to the Title VI Coordinator. The Title VI Coordinator will compile a list of individuals who fluently write or speak a language other than English and distribute to the department heads and elected officials. If staff cannot assist, private interpreter services can provide translation services for a reasonable 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 and subject to approval of a supervisor.

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

VII. Staff Training

Dallas County department heads and elected officials are required to fully understand, direct staff to comply, and must implement the Department’s LEP plan and to reinforce its importance. Dallas County Human Resources is also available to assist with information and training requests. 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:

- Dallas County LEP policy and procedures;
- Understanding Title VI LEP responsibilities;
- What language assistance services Dallas County offers;
- Use of Form E-2;
- Documentation of language assistance requests; and
- How to handle a complaint.

VIII. Translation Services

- Dallas County will create and maintain a list of bilingual staff (and the languages they speak), which will be maintained by the Title VI Coordinator, to assist with translations.
- Vital documents or vital information contained within a document, as determined at the discretion of the department, should be translated when a significant number or percentage of the LEP population is likely to be affected by the program/activity and it contains information that is critical for obtaining services and/or benefits, if the fee is reasonable and the department has the available resources.

IX. Providing Notice of Available Language Services to LEP Persons

- Posting signs that language assistance is available in public areas such as intake areas, customer service areas and other entry points to Dallas County departments. Depending on the language
- Statements may be placed in outreach documents indicating that language services are available from Dallas County.

X. Monitoring and Updating the LEP Plan

Dallas County and Dallas County departments will re-evaluate the LEP Plan on a regular basis. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available or when the County's Title VI Coordinator begins logging statistically significant requests for interpretive or translation services in the County's service area. Consideration shall be given to changes in demographics, types of services, or other needs when determining the frequency of LEP Plan reevaluation. Each reevaluation should examine all Plan components and assesses the following:

- How many LEP persons were encountered and what languages?
- Were their needs met?
- What is the current LEP population in Dallas County?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Dallas County programs? Are there other programs that should be included?
- Has Dallas County's or a specific Dallas County department's available resources, technology, staff, and financial costs changed?
- Has Dallas County or a specific department fulfilled the goals of the LEP Plan?
- Were complaints received?
- Are identified sources of assistance still available and viable?

Dallas County Department heads must maintain the data annually, for the fiscal year ending on May 14th. Attachments E(3)-E(5) should be completed for the fiscal year and returned to the Title VI Coordinator by May 14th of each year

XI. Dissemination of the Dallas County Limited English Proficiency Plan

Dallas County will post the LEP Plan on its website at www. [TBD]. 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 Dallas County Title VI Coordinator at:

Dallas County Human Resources
Dallas County Title VI Coordinator
Renaissance Tower, Floor 23
1201 Elm St., Ste. 2300-B
Dallas, Texas 75270
(214) 653-7638 (phone)
(214) 653-7608 (fax)

XII. 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, Dallas County, Texas 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 Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Dallas County. A complaint may also be filed by a representative on behalf of such a person. All Title VI complaints will be referred to Dallas County's Title VI Coordinator for review and action.
2. In order to have the Title VI complaint consideration under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of the alleged act of discrimination; or
 - b) If there has been a continuing course of conduct the date on the conduct discontinued.
3. Title VI complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth, as fully as possible, the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Dallas County, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person making a complaint in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to Dallas County's Title VI complaint procedures.
4. The Title VI complaint form (Attachment F to Dallas County's Title VI Plan) may be used to submit the complaint information. Complaint forms can also be obtained at the Dallas County Human Resources Office.
5. To request additional information on Dallas County's nondiscrimination obligations, to file a Title VI Complaint, or to request a complaint form, please submit a written request or complaint to:

Dallas County Human Resources
Dallas County Director of Human Resources and Title VI Coordinator
Renaissance Tower, Floor 23
1201 Elm St., Ste. 2300-B
Dallas, Texas 75270

(214) 653-7638 (phone)
(214) 653-7608 (fax)

DALLAS COUNTY
LEP Interpreter Services Poster

English:

Free Interpreter services are available. Please ask someone at the front desk.

Español:

Tenemos a su disposición servicios de intérpretes gratuitos. Si esta interesado, por favor solicítele ayuda a la recepcionista.

Zhōngguó:

Miǎnfèi fānyì fúwù. Qǐng qǐng tóngxuémén qiántái.



Employee Language Report

Voluntary Participation: Please include employees who possess language skills other than English and who are willing to assist a Limited English Proficiency (LEP) individual who requires language assistance.

DDO: _____ Date: _____

LEP DDO Contact: _____

Employee Name	Employee Phone	Language	Speaking			Reading			Writing			Understanding		
			Basic	Advanced	Native	Basic	Advanced	Native	Basic	Advanced	Native	Basic	Advanced	Native
(Place an 'X' in the column to indicate level of language skill)														
Example: Maria Gomez	123-456-7890	Spanish	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ATTACHMENT E(3)

ATTACHMENT E(4)



LEP Annual Report

Form 2492
(Rev. 02/14)
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Instructions: This report is to be completed by Districts, Divisions and Offices (DDOs) and submitted to the Office of Civil Rights via email at: TitleVI@txdot.gov

DDOs: Contact Person: Telephone: Report Year:

LEP Encounters

Total number of encounters:

Language most frequently requested: Spanish Other (specify): _____
(Select only one - Place an 'X' in the box)

LEP service most frequently used: Oral Interpretation (in person) Written Translation Telephone Interpretation
(Select only one - Place an 'X' in the box)

Most frequent method LEP service is rendered: Employee Contractor Community Volunteer LEP Person's Family/Friend
(Select only one - Place an 'X' in the box)
 Other Method (specify): _____

LEP Expenditures

Total LEP expenses: \$

Spanish: \$ Other Language (specify): _____ \$

Oral Interpretation (in person): \$ Written Translation: \$ Telephone Interpretation: \$

Translation of Documents

Total number of documents translated upon request: Total number of vital documents translated:

Types of Documents Translated:
 Application Brochure Notice Other Document (specify): _____

LEP Complaints

Total number of complaints: Number of complaints resolved:

Complaint Information

Date Filed	Date Resolved	Description

Be sure to attach any written DDO-specific policies and procedures that support your responses.

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LEP Areas	Yes/No	Explanation / Comments <i>Include any explanations/examples/comments that</i>
Assessing and Recording Language Needs		
1. Has the DDO taken steps to identify the non-English languages that are likely to be encountered in its service delivery area?	<input type="checkbox"/> / <input type="checkbox"/>	
2. Has the DDO identified the language needs of each LEP individual encountered and recorded this information?	<input type="checkbox"/> / <input type="checkbox"/>	
3. Does the DDO document the name and affiliation (e.g. staff interpreter, contract interpreter, etc.) of the person providing language services for each encounter with an LEP individual?	<input type="checkbox"/> / <input type="checkbox"/>	
4. Has the DDO identified the points of contact within their organization where language assistance is likely to be needed? (e.g. reception desks, intake counters, etc.)	<input type="checkbox"/> / <input type="checkbox"/>	
5. Has the DDO identified the resources that will be needed to provide effective language assistance and the location/availability of these resources?	<input type="checkbox"/> / <input type="checkbox"/>	
Oral Language Interpretation		
6. Does the DDO hire staff with language skills who are trained and competent in the skill of interpreting in the other language(s)?	<input type="checkbox"/> / <input type="checkbox"/>	
7. Does the DDO contract with interpreter service(s)?	<input type="checkbox"/> / <input type="checkbox"/>	
8. Does the DDO use volunteer community interpreters?	<input type="checkbox"/> / <input type="checkbox"/>	
9. Does the DDO use telephone interpreter service(s)?	<input type="checkbox"/> / <input type="checkbox"/>	
Translation of Written Materials		
10. Does the DDO provide written materials in languages other than English?	<input type="checkbox"/> / <input type="checkbox"/>	
11. Does the DDO translate application forms and other materials in languages other than English?	<input type="checkbox"/> / <input type="checkbox"/>	
Methods for Providing Notice to LEP Individuals		
12. Does the DDO use language identification cards to determine the language needs of LEP individuals?	<input type="checkbox"/> / <input type="checkbox"/>	
13. Does the DDO provide notice of language assistance services in the languages other than English?	<input type="checkbox"/> / <input type="checkbox"/>	
14. Does the DDO include a statement in brochures and other materials routinely disseminated to the public notifying LEP individuals that language assistance services are available.	<input type="checkbox"/> / <input type="checkbox"/>	

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LEP Areas	Yes/No	Explanation / Comments <i>Include any explanations/examples/comments that</i>
Training of Staff		
15. Have all staff been trained on TxDOT's LAP for addressing the language needs of LEP individuals?	<input type="checkbox"/> / <input type="checkbox"/>	
16. Does the DDO maintain records of the staff that has received training on language access policies and procedures?	<input type="checkbox"/> / <input type="checkbox"/>	
Monitoring		
17. Does the DDO monitor its LEP plan at least annually to evaluate its effectiveness at serving LEP individuals and modify it accordingly?	<input type="checkbox"/> / <input type="checkbox"/>	
Customer Service		
18. Does the DDO solicit and track customer feedback related to LEP individuals?	<input type="checkbox"/> / <input type="checkbox"/>	
19. Does the DDO have a complaint process in place to address concerns and complaints from LEP individuals about the department's LEP services?	<input type="checkbox"/> / <input type="checkbox"/>	
20. Does the DDO track the number of complaints and concerns received?	<input type="checkbox"/> / <input type="checkbox"/>	
21. Has the DDO addressed LEP complaints and concerns? Explain and identify if any corrective actions were taken and when.	<input type="checkbox"/> / <input type="checkbox"/>	
LEP Budget		
22. Does the DDO budget for LEP services in its annual budget projections? If Yes , detail how much and in what areas.	<input type="checkbox"/> / <input type="checkbox"/>	
Comments		

