

# Limited English Proficiency Plan for Harris County Community Services Department

Title VI of the Civil Rights Act of 1964 and its implementing regulations sets forth the guidelines for ensuring that programs receiving federal funding are making sufficient efforts to ensure that qualified persons, with limited English proficiency are aware of and have access to all programs of assistance for which they qualify.

Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” directs each Federal Agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s Policy Guidance entitled “Enforcement of Title VI of the Civil Right Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency.” Different treatment based upon a person’s inability to speak, read, write or understand English may be a type of national origin discrimination.

The purpose of this limited English Proficiency policy guide is to clarify for HCCSD staff those responsibilities they have to limited English proficient groups as they seek assistance and support services from Harris County Community Services Department (HCCSD), a recipient of funding from the United States Department of Housing and Urban Development as well as the United States Department of Transportation, and the various sub-contracting groups with which we work.

The Limited English Proficiency Plan (LEP) was developed to help identify reasonable steps to provide language assistance for LEP persons seeking access to the services of HCCSD as required by Executive Order 13166. The plan details procedures for identifying a person who may need language assistance, the ways in which assistance may be provided, training of staff and notifying LEP persons of assistance available to them through the department and related resources.

In developing the plan to fulfill CSD’s obligations to provide services to LEP groups, HCCSD took into account four factors to determine its level of responsibility. Those factors are detailed below.

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program.**

The various services being offered by HCCSD are available to a Harris County population of LEP citizens that, according the U.S. Census 2012 American Community Survey, make up approximately 37.9 percent or 1.48 million individuals that speak a language other than English (of these 34.6 percent spoke Spanish) and that number is growing increasingly larger as that segment of the population's growth increases while the English speaking segment of the population decreases.

**2. The frequency with which LEP persons come into contact with the programs of HCCSD.**

Staff of HCCSD encounters LEP persons seeking assistance from the various programs offered on a daily basis in the office environment as well as at the various outreach activities that staff attends throughout the county. Documented phone inquiries and phone logs also strengthens the case for increased provision of assistance to LEP clients.

**3. The nature and importance of the program, activity or service provided by HCCSD to people's lives.**

The essential services being provided by the department such as the rental and utility assistance programs, the home buyer assistance programs and other social service programs are key to ensuring that LEP individuals are able to secure and maintain a healthy and stable living environment for themselves and their families. In order to ensure that these communities are able to fully benefit from our programs, HCCSD has made a commitment to partner with community based organizations, within these LEP communities that are able to share information about program assistance and support to these community residents.

**4. The resources available to HCCSD to implement programs for LEP.**

The resources available for HCCSD to ensure that LEP groups are able to access our programs include the local community partnerships, multilingual staff working at all locations, translation services available when needed and outreach through local community newspapers and outreach organizations.

Once these factors were taken into consideration, HCCSD was better able to develop a plan to ensure full access of its programs to persons of limited English Proficiency. The following LEP procedures are in effect for all programs within HCCSD:

1. All CSD publications, public announcements and other information is provided in English and Spanish;
2. The CSD Website provides information in both English and Spanish;

3. CSD has bilingual staff at all locations. Should an interpreter be needed, in person, or on the telephone, the person is referred to a bilingual employee. A translation service is also available to accommodate other languages.
4. The automated telephone answering system provides an English/Spanish option for services. Additionally, phone interpreter services are available for languages spoken by potential clients who do not speak English through a translation service provider.
5. When public meetings are held, CSD has access to an English/Spanish interpreter and all announcements of public meetings state that translation services will be provided when advanced notice of need is received.

Staff training, as it relates to provision of services to LEP clients includes the following;

1. Understanding of the Title VI policy and LEP responsibilities of CSD.
2. Understanding of language assistance available to staff when engaged with LEP clients.
3. Procedures for documenting language assistance requests.
4. Procedures for handling Title VI and/or LEP complaints.

Outreach activities undertaken by CSD include;

1. The publication of all CSD program informational brochures is done in alternative languages.
2. Advertisements and notices of program related activities are done on major Spanish and alternative language radio stations as well as news publications.