

Program Applied to: Agency Wide

**TITLE: LIMITED ENGLISH PROFICIENCY
(LEP) PLAN**

**Approved by: Board of Directors
Effective Date: January, 2020
Revised: May, 2021**

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 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 no longer falls under the Safe Harbor Provision. Therefore, COI is 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 will provide written translations of vital documents and does have access to competent translators should they be necessary. COI does not hesitate to utilize translation 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.

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

COI offers transportation services to approximately 200 adults currently enrolled in services with the agency. Transportation takes place primarily in Montrose and Delta Counties however, COI serves an

additional four counties: Hinsdale, San Miguel, Ouray and Gunnison. Below reflects the overall population of each county and the percentage of people who speak Spanish in each county. Data was found at census.gov/quick facts and references 2019 demographics for all six counties.

County	Total Population	Percentage of Spanish Speaking People
Montrose County	42,758	20.9%
Delta County	31,162	15.3%
Hinsdale County	820	5.7%
Gunnison County	17,462	9.6%
San Miguel County	8,179	11.40%
Ouray County	4,952	6.50%

As a result of these statistics, Community Options will make all vital CDOT transportation materials available in Spanish.

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. The Intake Manager, Case Manager or any staff in the service area can/will offer translated material to the client.

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. For any client or family requiring translation, the policies, procedures and notices will all be available in Spanish.

Factor 4. Resources Available for LEP Outreach

Community Options makes every effort to notify our constituency who are Spanish-speaking of the availability of written materials in Spanish and free interpretation services for important documents and information.

LANGUAGE ASSISTANCE PLAN

The Community Options plan is designed to be responsive to the needs of our constituents 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. This is the case with the update noted June, 2021.

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.

In April, 2021 it was brought to the attention of the agency that demographics had changed in Montrose County and it was necessary to update this policy. As a result of the update, COI can no longer claim Safe Harbor and will make all vital CDOT policies, procedures and notices available in Spanish effective June, 2021.

Disseminating Our LEP Plan

- The Community Options Board of Directors has adopted this plan and the June, 2021 update.
- The plan will be posted on the COI website, Allison Administration Building and both day program locations.