

CITY OF HOLLAND

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

270 S. River Ave. Holland, MI 49423 616-355-1300 Phone 616-355-1490 Fax

Website: www.cityofholland.com

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A RESOLUTION OF THE CITY OF HOLLAND

ADOPTING THE

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

WHEREAS, in accordance with Title VI non-discrimination laws in regard to providing appropriate access to services and activities provided by federal agencies and recipients of federal assistance, the Limited English Proficiency Plan was drafted to define how the City of Holland will accommodate persons with Limited English Proficiency; and

WHEREAS, individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter; and

NOW, THEREFORE, BE IT RESOLVED that the Holland City Council approves and adopts the Limited English Proficiency Plan for the City of Holland.

Adopted the $\frac{1}{2}$ day of $\frac{1}{2}$ 015

Mayor, Nancy DeBoer

Deputy City Clerk, Anna Perales

Introduction

On August 11, 2000, President William J. Clinton signed an executive order, <u>Executive Order 13166</u>: <u>Improving Access to Service for Persons with Limited English Proficiency</u>, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write and speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounterⁱⁱ. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP," or Limited English Proficient. The Executive Order states that:

"Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities."

Not only do all federal agencies have to develop LEP plans as a condition of receiving federal financial assistance, recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided as well.

Federal financial assistance includes grants, training, and use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and organizations. Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered, even if only one part of a recipient's organization receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

The City of Holland receives funds from the US Department of Transportation via the Federal Highway Administration.

The US Department of Transportation published *Policy Guidance Concerning Recipients'* responsibilities to Limited English Proficient Person in the December 14th, 2005 Federal Register.ⁱⁱⁱ

The Guidance implies that the City of Holland is an organization that must follow this guidance:

This guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing and LEP policy or plan. These elements include:

- 1. Identifying LEP persons who need language assistance
- 2. Identifying ways in which language assistance will be provided
- 3. Training Staff
- 4. Providing notice to LEP persons
- 5. The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the USDOT.

These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- 2. The frequency with which LEP individuals come in contact with the program.
- 3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
- 4. The resources available to the City of Holland and overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

The DOT guidance is modeled after the Department of Justice's guidance and requires recipients and sub recipients to take steps to ensure meaningful access to their programs and activities to LEP persons. More information for recipients and sub recipients can be found at http://www.lep.gov.

The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to the City of Holland services and activities that may affect their quality of life. Recommendations are then based on the results of the analysis.

Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are 'very well', 'well', 'not well', and 'not at all'. For our planning purposes, we are considering people that speak English less than 'very well' as Limited English Proficient persons.

First, please note the City of Holland boundaries fall in both Ottawa and Allegan counties. As seen in Table #1 and Table #2 below. In both Ottawa and Allegan counties, the tables reflect Spanish citizens speak English less than "very well". A percentage greater than 5% require a separate LEP Plan.

TABLE #1

Holland City, Ottawa County				
2013 LANGUAGE SPOKEN AT HOME				
Population 5 years and over	30,447	30,447		
English only	23,209	76.20%		
Language other than English	7,238	23.80%		
Speak English less than "very well"	2,689	8.80%		
Spanish	5,692	18.70%		
	7.45	7,46%		
Other Indo-European languages	621	2.00%		
Speak English less than "very well"	132	0.40%		
Language other than English	880	2.90%		
Speak English less than "very well"	297	1.00%		
Other languages	45	0.10%		
Speak English less than "very well"	0	0.00%		

Holland City, Allegan County				
2013 LANGUAGE SPOKEN AT HOME				
Population 5 years and over	6,322	6,322		
English only	5,175	81.90%		
Language other than English	1,147	18.10%		
Speak English less than "very well"	521	8.20%		
Spanish	902	14.30%		
	200	6.20%		
Other Indo-European languages	169	2.70%		
Speak English less than "very well"	129	2.00%		
Asian and Pacific Islander languages	76	1.20%		
Speak English less than "very well"	0	0.00%		
Other languages	0	0.00%		
Speak English less than "very well"	0	0.00%		

Factor 2: Frequency of Contact with LEP Individuals

The city has conducted an informal survey of our employees with regard to whether they have had encounters with LEP individuals in the performance of their job functions and found that they have had encounters with LEP individuals. The City has its offices accessible to the public and therefore accessible to LEP individuals on a regular basis. The City also has staff that work in the field that encounter LEP individuals. Additionally, the City conducts regular City Council meetings every 1st and 3rd Wednesday of each month with public hearings held as needed along with numerous City Boards and Commissions meeting monthly which potentially bring LEP individuals to these meetings. Given the large concentration of LEP individuals as displayed in Table #1 (above) the probability of our employees to encounter an LEP individual is high.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP

The City of Holland serves individuals throughout the city in a variety of ways including managing roads, water, sewer, police, fire, elections, and other services to citizens of the City as well as individuals from outside the city, such as visitors and those traversing the state. The nature of the services that the City provides is very important to an individual's day-to-day life. Therefore the denial of services to an LEP individual could have a significant detrimental effect. Due to the concentration of Spanish, Asian and Pacific Islander, and other LEP language groups in our city; we will ensure accessibility to all of our programs, services, and activities.

Factor 4: The Resources Available to the City of Holland and Overall Cost

US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns."

Based on this guidance, we have reviewed our resources and deemed that given the high concentration of Spanish speaking LEP individuals in our city we will translate our vital documents in Spanish.

Although there will not be a fixed amount allocated from our yearly budget for the translation of documents, the cost associated with the necessary translation of documents in order to comply with LEP requirements will be allocated on as-needed basis.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Given the high concentration of Spanish speaking LEP individuals (as seen above in Table #1) the City has deemed that written translations of all vital documents should be made into the Spanish language, at minimum. The City will translate all vital documents which will include, but not be limited to, the complaint form, complaint procedures, and all public meeting notices into Spanish.

Providing Notice to LEP Persons

USDOT LEP guidance says:

"Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand."

The guidance provides several examples of notification including:

- 1. Signage in languages that an LEP individual would understand when free language assistance is available with advance notice.
- 2. Stating in outreach documents that language services are available from the agency.
- 3. Working with community-based organizations and other stakeholders to inform LEP individuals of the recipient's services, including the availability of language assistance services.

Statements in languages that an LEP individual would understand will be placed in public information and public notices that persons requiring language assistance or special accommodations will be provided, with reasonable advance notice to the City of Holland.

Options and Proposed Actions

Options:

Federal fund recipients have two (2) main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.^{iv}

City of Holland is defining as interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as a person

who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

Considering the relatively small scale of the City of Holland, the high concentration of LEP individuals in the service area, and the City's financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Other than the previously mentioned vital documents, if there is additional language assistance measures required for LEP individuals, the City shall proceed with oral interpretation options to meet all requests for those language groups to ensure equal access while also complying with LEP regulations.

What the City of Holland will do.

- With advance notice of seven calendar days, the City will provide interpreter services at public meetings, including language translation and signage for the hearing impaired.
- The City will utilize the *Translators Resource List* as provided by MDOT for translation services and verbal interpretation.
- Ensure placement of statements in notices and publications in languages other than English that interpreter services are available for public meetings.
- The Census Bureau "I-speak" Language Identification Card will be distributed to all employees that may potentially encounter LEP individuals.
- Once the LEP individual's language has been identified, an agency from the *Translators Resource List* will be contacted to provide interpretation services.
- Publications of the city's complaint form available at public meetings.
- In the event that a City employee encounters a LEP individual, they will follow the procedure listed below:

OFFICE ENCOUNTER

- 1. Provide an I-speak language identification card to determine the language spoken of the LEP individual.
- 2. Once the foreign language is determined, provide information to Title VI coordinator who will contact an interpreter from MDOT's *Translators Resource List*.

3. If the need is for a document to be translated, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

ROAD ENCOUNTER

- 1. Road crew employee will immediately contact the Title VI coordinator for assistance, and provide an I-speak language identification card to the LEP individual to determine the language spoken of the individual.
- 2. Once the foreign language is determined, provide information to Title VI coordinator who will contact an interpreter from MDOT's *Translators Resource List* to provide telephonic interpretation.
- 3. If the need is for a document to be translated, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

IN WRITING

- 1. Once a letter has been received it will be immediately forwarded to the Title VI Coordinator.
- 2. The Title VI Coordinator will contact a translator from the MDOT's *Translators Resource List* to determine the specifics of the letter request for information.
- 3. The Title VI Coordinator will work with the selected agency to provide the requested service to the individual in a timely manner.

OVER THE PHONE

- 1. If someone calls into our office speaking another language every attempt will be made to keep that individual on the line until an interpreter can be conferenced into the line and if possible determine the language spoken of the caller.
- 2. Once the language spoken by the caller has been identified we will proceed with providing the requested assistance to the LEP individual.

The City of Holland Staff Training

The City of Holland staff will be trained on the requirements for providing meaningful access to services for LEP persons.

LEP Plan Access

A copy of the LEP plan document can be requested at the City of Holland's main office during normal business hours and the City will make the plan available on its website at www.cityofholland.com. Any person or agency may also request a copy by contacting:

Esther C. Fifelski Community/Human Relations Coordinator 270 S. River Ave., City Hall Holland, MI 49423

Email: <u>e.fifelski@cityofholland.com</u> Phone: 616-335-1328

Fax: 616-355-1490

ⁱ The executive order verbatim can be found online at http://www.usdoj.gov/crt/cor/Pubs/eolep.htm.

ⁱⁱ Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 (Volume 70, Number 239)

iii The DOT has also posted an abbreviated version of this guidance on their website at http://www.dotcr.ost.dot.gov/asp/lep.asp.

iv http://www.dotcr.ost.dot.gov/asp/lep/asp

^v Department of Justice Final LEP Guidelines, Federal Register June 18, 2002-Vol. 67-Number 117.

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Michigan Department Of Transportation 0106 (11/10)

SUB-RECIPIENT APPLICATION FOR CERTIFICATION OF TITLE VI AND EEO COMPLIANCE AND ASSURANCES

Title VI of the Civil Rights Act of 1964, related statutes and regulations provide that no person shall on the grounds of race, color, national origin, gender, age, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

If you need assistance completing this form or additional information, please contact us by phone at (517) 373-0980, Fax (517) 373-6457 or TDD/TTY through the Michigan Relay Center at (800) 649-3777.

COMPANY/ORGANIZATION NAME City of Holland	TELEPHONE NUMBER 616-355-1321
STREET ADDRESS 270 S. River Avenue	FAX NUMBER 616-355-1490
P.O. BOX	CITY Holland, MI
COUNTY Ottawa/Allegan	STATE ZIP CODE MI 49423

Recipients of federal financial assistance must comply with the following procedures for monitoring and ensuring nondiscrimination in any program, service, or activity, as required by 23 CFR Appendix A of part 230 Special Provisions.

- Sub-recipient must establish an Equal Opportunity Policy. Sub-recipient must accept as their operating policy the following: It is the policy of this Company to assure that applicants are employed, and that employees are treated during employment without regard to their race, religion, gender, color, or national origin. Such action shall include: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship pre-apprenticeship, and/or on-the-job training.
- 2. Sub-recipient must designate and make known to MDOT an Equal Opportunity Officer. The individual appointed must be capable of effectively administering and promoting an active program of equal employment opportunity and must be assigned adequate authority and responsibility to do so.
- 3. The sub-recipient equal opportunity policy must be disseminated to all staff members authorized to hire, supervise, promote, and discharge employees, or who recommend such action. To ensure that the policy is known, periodic meetings of supervisory and personnel office employees must be conducted not less than once every six months.
- 4. All employees, prospective employees and potential sources of employees should be advised of the sub-recipients equal opportunity policy. Notices and posters setting forth the employer's equal opportunity policy must be placed in areas readily accessible to the aforementioned. The employer's/contractor's equal employment opportunity and the procedures to implement the policy must be brought to the attention of employees by means of meetings, employee handbooks, or other appropriate means.
- 5. When advertising for employees, the sub-recipients must include, in all advertisements for employees the notation: "An Equal Opportunity Employer." All such advertisements must be published in newspapers or other publications having a large circulation among minority groups in the area from which the project work force would normally be derived.
- 6. Sub-recipients must establish a process to investigate all complaints of alleged discrimination and take appropriate corrective action, including a method to inform all complainants of their avenues of appeal. Complainants should be advised of their right to file a complaint with governmental agencies (i.e., the State recipient, the Federal agency providing funds to the state recipient, the Department of Civil Rights, the Department of Justice, etc.).

A copy of 23 CFR Appendix A to Subpart A of Part 230 Special Provisions is available upon request. It provides specific information regarding equal employment opportunity responsibilities.

NAME AND TITLE OF THE EQUAL EMPLOYMENT OFFICER (this individual must be capable of effectively administering and promoting an active equal opportunity program and is assigned adequate authority and responsibility to carry out these duties.)

Esther C. Fifelski City of Holland	NAME (Please Print)	COMPANY/ORGANIZATION TITLE (Please Print)
	Esther C. Fifelski	City of Holland

I certify that I will abide by the e	qual employment opportunity requirements outlined in this application. I also understand the p	provisions
of Title VI and related statutes.	This certification is also my assurance that I will not discriminate on the grounds of race, color	r, national
origin, gender, age, or disability.		

AUTHORIZED CORPORATE OR ORGANIZATIONAL OFFICER	TITLE	DATE
Esther C. Fifelski That C. Julium	Title VI Coordinator	November 12, 2016

NOTE: You must notify MDOT within 45 days if any of the information you provided on this application changes.

Please return this application to:

Cheryl Hudson, EEO Officer
Michigan Department of Transportation
425 W. Ottawa Street
Lansing, Michigan 48933
(517) 373-0980
HudsonC1@michigan.gov

Do not write in this area below				
APPROVAL	DATE			

Michigan Department of Transportation 0179 (07/11)

TITLE VI SUB-RECIPIENT ANNUAL CERTIFICATION FORM

Page 1 of 2

This form is to certify compliance with Title VI of the Civil Rights Act of 1964. If your Title VI Plan has been approved by the Michigan Department of Transportation (MDOT), all changes to the organization's Title VI Plan which occurred during the current fiscal year (October 1 thru September 30) must be reported on this form. Please attach additional pages, as necessary, to provide a complete response to each question.

NAME O	F ORGANIZATION Iolland							
	F TITLE VI COORDINATOR C. Fifelski			TITLE Title V	'I Coordin	nator		
ADDRES 270 S. F	S River Avenue			•				
CITY Holland			COUNTY Ottawa			STATE MI	ZIP CODE 49423	
TELEPH	ONE NO.	FAX NO.			E-MAIL A	DDRESS		
1.	Has your Title VI Coordina your last Title VI Plan was information for the new coo Esther C. Fifelski, City of H	approved? ordinator/EE	If yes, please list EO Officer.	the nar	ne and co	ontact	∑ Yes). e.fifelski@	□ No
2.	Has your organization had many? If yes, what did you had meaningful access to	u do to ensi	ure that those pop	ulations	affected	by the project	□ No	⊠ Yes
	community that may not City Council Chambers. Tupdate and we anticipate input for the Master Plan. City minority populations and Central Park Reforme consultant (LIAA) reached participation. We held the informational meetings, owners within roadway outpon request will provide Government. Translation for American Sign Languis speakers.	To date, we are more throat. Several of a (Holland Hed Church). It do not to Sailaree public Our Transponstruction a language as for the grage. Additional control of the grage. Additional control of the grage.	have held nine (9) ughout the process the public meeting the interest of the public meeting the public meeting the public meetings for transportation Department and held Open I assistance or other public from the public fr	ess. We ngs we ry Scho he turn is Cathe portat hent pr House er serv n June n daily	c hearing e also hel ere held in ool, Maple out for the olic Churd ion proje ovided co events to ices requ 2014 - Ju basis has	gs/meetings/op d 14 targeted s n venues more e Avenue Minis hose meetings ch where we re ects. We held se onstruction not discuss the de ired for citizens ne 2015 were 2 s staff to provid	pen houses for takeholder of the conducive for tries, Corner was very low exerved much exeral roadwatices to adjantalls of the participals; one for Chelling for	for the master Plan meetings to gether for interactions with rstone Tabernacle w. Our Master Plan h higher way work public cent property project. The City, ate in the city inese and the other n for Spanish
3.	What is the number or per project?	centage of I	LEP or EJ populat	ions wr	o were a	mected by the	Our commu	unity is diverse: Cauc
4.	How many public involvem	ent meeting	gs did you hold du	ring the	reporting	g period?	We hosted	over 46 public meetic
5.	Did you provide language reporting period? How ma	iny persons	received this assi	stance	?	_	□ No	⊠ Yes
6.	Yes. We provided assistated Did you provide reasonable reporting period? How many the control of	e accommo					No	rican Sign Languag
	Yes. The city provided A	merican Sig	ın Language assis	tance	o a citize	en applying for	community	neighborhood servii
7.	Did you receive any forma reporting period? If yes, h complaint or law suit and t	ow many, a he resolutio	nd please provide n.	details	regardin	g each	⊠ No	Yes
	The City did not receive a complaints on a monthly		ints related to dis	crimin	ation. Ho	owever, the city	does track	all citizen
8.	How many contracts did yo during the reporting period by DBEs?							

Our transportation department engaged 1 minority contractor. Our Community Neighborhood Services engaged 6 minority-owned businesses.

 During this reporting period, how many of your employees have been educated about Title VI and their responsibility to ensure non-discrimination in any of your programs, services, or activities.

The City conducted a training related to Harrassment as it relateds to protected classes in the State. The training was conducted by the Michigan Department of Civil Rights. At the same time, the City reviewed the process on how to submit discriminatory complaint(s) to the City. All staff members were required to attend. The City annually participates in the Lakeshore Ethnic Diversity Forum. We have now added the Title VI, LEP and Complaints Process as part of the Orientation Package for New Hires.

 Please provide any comments or additional information related to the organization's Title VI Plan.

The Title VI Coordinator regularly conducts LEP plan audits. We are now including Title VI and LEP training as part of the employee orientation process.

The information reported on this form is accurate and reflects all changes to the organization's Title VI Plan for the current fiscal year.

NAME	TITLE	DATE
Esther C. Fifelski	Title VI Coordinator	November 17, 2015
W. Commercial Commerci		

If you have questions regarding Title VI, contact: Cheryl Hudson, EEO Officer (517) 373-0980, or <a href="https://hudson.com/Hudson.