



COUNTY OF LAKE

**LAKE COUNTY ANIMAL CONTROL
AND
LAKE COUNTY LIBRARY**

**LANGUAGE ACCESS PLAN (LAP) FOR
LIMITED ENGLISH PROFICIENCY INDIVIDUALS**

May 2017

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1. **Executive Order 13166**

Executive Order 13166 requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide meaningful access to those services, programs and information to LEP persons.

This executive order also requires agencies to ensure that federally assisted activities carried out by recipients of federal financial assistance comply with the nondiscrimination prohibitions of Title VI of the Civil Rights Act of 1964 and its implementing regulations. Title VI prohibits national origin discrimination and, for this reason, obligates recipients to provide LEP individuals with meaningful access to their services, programs and activities.

The text of the Order is as follows:

*August 11, 2000 Department of Justice - Enforcement of Title VI of the Civil Rights Act of 1964—
National Origin Discrimination Against Persons With Limited English Proficiency; Notice
The President - Improving Access to Services for Persons with Limited English Proficiency*

By the authority vested in me as President by the Constitution and the laws of the United States of America, and 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), it is hereby ordered as follows:

Section 1. Goals.

The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English language. The Federal Government is committed to improving the accessibility of these services to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. To this end, each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. Each Federal agency shall also work to ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their LEP applicants and beneficiaries. To assist the agencies with this endeavor, the Department of Justice has today issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. As described in the LEP Guidance, recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Sec. 2. Federally Conducted Programs and Activities.

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. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans.

Sec. 3. Federally Assisted Programs and Activities.

Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order, each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its guidance document in the Federal Register for public comment.

Sec. 4. Consultations.

In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.

Sec. 5. Judicial Review.

This order is intended only to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person.

2. Language Assistance Goal

The goal of the Language Access Plan (LAP) is to provide meaningful access through effective communication with limited English proficient individuals at all points of contact between an LEP individual and Lake County Animal Control and Lake County Libraries. The purpose of the Plan is to eliminate or reduce limited English proficiency as a barrier to accessing programs and activities and to ensure that LEP individuals have substantially equal and meaningfully effective access to department programs and services.

It is the responsibility of the department and not the LEP person to take reasonable steps to ensure that communications between the Department and the LEP person are not impaired as a result of the limited English proficiency of the individual. Department staff shall take reasonable steps to inform the public of the availability of language accessible programs and activities.

3. **Definitions** (As provided in the *U.S. Department of Justice Language Access Plan, March 2012*)

Limited English Proficiency (LEP): Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

Language Assistance Services: Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the department.

Interpretation: The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.

Effective Communication: Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communications with others when providing similar programs and services.

Meaningful Access: Language assistance that results in accurate, timely and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.

Multilingual staff or employee: A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking or understanding at least one other language as authorized by his or her agency.

Primary language: An individual's primary language is the language in which an individual most effectively communicates.

Program or Activity: The term "program or activity" and the term "program" mean all of the operations of the department. There are two major categories covered: 1) general public contact as part of ongoing operations, including communication with the public by telephone and department walk-ins; and 2) services or benefits provided by the department directly to program beneficiaries and participants.

Qualified Translator or interpreter: An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or is authorized to do so by approval of his or her agency.

Translation: The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

Vital Document: paper or electronic written material that contains information that is critical for accessing a department's program or activities, or is required by law. Documents that may be considered Vital include claim or application forms, public outreach and educational materials, and notices regarding the availability of language assistance services provided by the department.

4. Lake County Animal Control Department-Four Factor Analysis

1. The number and proportion of LEP Persons Served or Encountered in the Eligible Service Population

- A. Prior Experience with LEP individuals: The primary contact is with Spanish speaking LEP individuals visiting the Animal Control office. Staff estimates they encounter Spanish speaking LEP individuals approximately twice a month.
- B. Data From the U.S. Census Bureau: The following information was taken from the 2010-2014 American Community Survey, Social Characteristics of Lake County California:

Language Spoken at Home by Ability to Speak English for the Population 5 years and over: 2010-2014 ACS 5-Year Estimates	Lake County, California	Percentage of Population
Total:	60,612	100%
Speak only English	51,544	85%
Spanish:	7,637	12.6%
Speak English less than very well	3,097	5.1%
Other Indo-European languages	877	1.4%
Speak English less than very well	195	.3%
Asian and Pacific Islander languages	443	.7%
Speak English less than very well	110	.2%
Other languages	111	.2%
Speak English less than very well	31	.1%

- C. Identify the Geographic Boundaries of the Area Served: The Lake County Animal Control Department serves the entire County area, and thus the statistics above are applicable to this department.
- D. Analyze the Data Collected: Based on the census data for Lake County, the only LEP individuals that require an LEP Plan are Spanish speaking individuals.

2. The Frequency with which LEP Individuals Come into Contact with the Rural Development Program Funded Programs, Activities and Services

Staff has reviewed the frequency of contact with Spanish speaking individuals, and it is estimated at approximately two contacts per month.

3. The Importance to LEP Persons of the Rural Development Program, Activities and Services

The Lake County Animal Control Department provides the following services to County residents:

- a. Vaccination clinics
- b. Assistance with spay and neutering pets
- c. Animal adoption
- d. Pet euthanasia
- e. Emergency disaster response
- f. Livestock purchase/auction
- g. Community education
- h. Pet licensing
- i. Dead animal disposal
- j. Conflict resolution

Programs of significant importance to LEP individuals are:

- a. Vaccination clinics
- b. Pet licensing
- c. Assistance with spaying and neutering pets
- d. Filing a complaint or responding to a complaint filed against them (conflict resolution)

4. The Resources Available to the Recipient and Costs

- a. Currently the Lake County Animal Control Department provides the following language assistance services at no charge:

The County's Human Resources Department has a list of certified Spanish speaking employees who can be called when interpreting services are required. The Animal Control Department currently has an extra help employee who can provide interpreting services when they are in the office. The department is currently working to obtain certification for two of their employees.

- b. Additional services needed to provide meaningful access to department services:

Department information that should be translated into Spanish at the cost of approximately \$20 per page:

Information about the spay/neuter program provided by animal control;
 Information about dog licensing requirements;
 Information about vaccination clinics and notices when they are held;
 Information about responding to complaints filed against their pets;
 Information about filing a complaint against a neighbor's pet; and
 Provide a poster in the lobby and post a notice on the website notifying LEP persons of language assistance availability.

5. Lake County Library – Four Factor Analysis

Four Factor Analysis

1. The number and proportion of LEP Persons Served or Encountered in the Eligible Service Population

- A. Prior Experience with LEP individuals: The primary contact is with Spanish speaking LEP individuals visiting the libraries. Staff estimates they encounter Spanish speaking LEP individuals less than once a month.
- B. Data From the U.S. Census Bureau: The following information was taken from the 2010-2014 American Community Survey, Social Characteristics of Lake County California:

Language Spoken at Home by Ability to Speak English for the Population 5 years and over: 2010-2014 ACS 5-Year Estimates	Lake County, California	Percentage of Population
Total:	60,612	100%
Speak only English	51,544	85%
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Asian and Pacific Islander languages	443	.7%
Speak English less than very well	110	.2%
Other languages	111	.2%
Speak English less than very well	31	.1%

- C. Identify the Geographic Boundaries of the Area Served: The Lake County Libraries serve the entire County area, and thus the statistics above are applicable to this department.
- D. Analyze the Data Collected: Based on the census data for Lake County, the only LEP individuals that require an LEP Plan are Spanish speaking individuals.

2. The Frequency with which LEP Individuals Come into Contact with the Rural Development Program Funded Programs, Activities and Services

Staff has reviewed the frequency of contact with Spanish speaking individuals, and it is estimated to be less than one contact per month.

3. The Importance to LEP Persons of the Rural Development Program, Activities and Services

The Lake County Library provides the following services to County residents:

- Free loaning of books and other materials to the public
- Free public wi-fi access
- Free public computer access
- Free special programs and events
- Free adult literacy program

Programs of significant importance to LEP individuals are:

- Free loaning of books and other materials to the public
- Free public computer access

4. The Resources Available to the Recipient and Costs

- a. Currently the Lake County Library provides the following language assistance services at no charge:

The County's Human Resources Department has a list of certified Spanish speaking employees who can be called when interpreting services are required.

The libraries have a guide at each circulation desk titled, "Survival Spanish for Library Staff" and an online training with the same name is available to library staff:
<https://infopeople.org/content/survival-spanish-library-staff>.

The library card application has been translated into Spanish and our library catalog is also available in Spanish: https://find.sonomalibrary.org/client/es_ES/lakeco/. The library catalog allows patrons to check their account, request books for pickup, and find materials in the library.

The Summer Reading Program signup flyer and sign up form is translated into Spanish.

The Lake County Adult Literacy program provides an English Language Learning Intensive tutor who works with schools to teach English as a Second Language (ESL) students how to use the library.

Although the Adult Literacy Program only provides instructions in English, they do refer individuals to ESL programs if appropriate.

Reminder emails and mail sent to patrons for materials they need to return are sent in English and Spanish.

The language on library computers can be set to Spanish.

The library has approximately 1,500 library materials in Spanish, including books, DVDs and audiobooks for children and adults. More Spanish language materials can be requested at no charge from Sonoma and Mendocino County libraries on the online catalog.

- b. Additional services needed to provide meaningful access to department services:

Provide a poster in the lobby and post a notice on the website notifying LEP persons of language assistance availability.

6. Implementing the Language Access Plan (LAP)

A. Identifying LEP individuals

At the point of first contact with an LEP individual, staff shall make reasonable efforts to assess the need for language assistance services and to obtain such services if they are needed. Staff can determine language assistance needs in the following ways:

1. Self-identification by the LEP individual or companion;
2. Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services;
3. Asking a multilingual staff or qualified interpreter to verify an individual's primary language;
4. Using an "I Speak" language identification card or poster.

Absent emergency circumstances, avoid using family members (including children), neighbors, friends, acquaintances and bystanders to provide language assistance services.

B. Language Assistance Measures

Department staff will assist LEP individuals as follows:

1. Translating services will be provided by an on-site staff member or a certified Spanish speaking County employee;
2. Some vital forms are available which have been translated into Spanish, and LEP individuals can ask for printed materials translated into Spanish;
3. Department staff can respond to walk-in, telephone and written communication from LEP individuals using the County's certified Spanish interpreters.

C. Staff Training

New and existing staff members should be periodically trained on the content of the language access policy, identifying language access needs, and providing language assistance services to LEP individuals. Training should include:

1. Identifying the language needs of an LEP individual;
2. Working with an interpreter in person or on the telephone;
3. Requesting documents for translation;
4. Accessing and providing language assistance services through multilingual employees, and in-house interpreters;
5. Duties of professional responsibility with respect to LEP individuals;
6. Interpreter ethics;
7. Tracking the use of language assistance services; and
8. Tips on providing effective assistance to LEP individuals.

D. Vital Document Translations

The following are vital documents which are critical for ensuring meaningful access to the departments' major activities and programs by LEP individuals:

Animal Control:

Vaccine clinic information
Dog licensing information
Spay/Neuter information
Conflict resolution information

Library:

Library Card Application (see attached translated document)
Information regarding library usage (see attached translated document)
The Summer Reading Program signup flyer and sign up form are translated into Spanish.

The departments will begin the process of getting vital forms translated into Spanish, and will request immediate translations of forms and information at the request of LEP individuals.

E. Providing Notice to LEP Persons

Each department will make reasonable efforts to notify the public about its LEP policies and how to access language assistance services. The departments will use the following methods of providing notification:

1. Posting signs in the lobby and other entry points

2. Stating in outreach documents that language services are available
3. Having a notice on the department's website

F. Monitoring and Updating the Language Access Plan

A review of this Language Access Plan (LAP) will be done every three years. The following shall be evaluated:

1. LEP populations in the County
2. Frequency of encounters with LEP individuals
3. Nature and importance of activities provided to LEP individuals
4. Available resources and costs of providing services
5. Whether existing assistance is meeting the needs of LEP individuals
6. Whether staff is aware of and understands the LEP plan and how to implement it
7. Whether current sources of assistance are viable

Staff should collect data regarding provision of language assistance services and provide this data to their department head for inclusion in the update of this Plan. The data should include the date assistance was provided, the type of assistance that was provided, and the services being used by the LEP individual. From these statistics the number of staff and percentage of staff time associated with providing language assistance can be determined. Staff should also track any expenses incurred in providing language assistance services.