



Limited English Proficiency Plan

Northwest Hills Council of Governments

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1. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address NHCOC responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including NHCOC which receives and administers federal grant funds.

NHCOC has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who speak English less than very well.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

2. MEANINGFUL ACCESS: FOUR FACTOR SUMMARY

In order to prepare this plan, NHCOC used the four-factor LEP analysis provided by the United States Department of Transportation, which considers the following factors:

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 people's lives.
4. The resources available to the recipient and cost

3. MEANINGFUL ACCESS: FOUR FACTOR ANALYSIS

A. 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.

Using 2007-2011 American Community Survey data¹, the total number of those who speak English less than very well was 5,671 persons. With a regional population of 176,643 persons, the total percentage of those who speak English less than very well is 3.21%. As described above, only one language exceeded 1,000 persons Safe Harbor threshold in the region. That language group was Spanish or Spanish Creole with 2,889 persons speaking English less than very well.

Of the 21 towns, Torrington, Winchester, Sharon, and North Canaan had more than 100 residents that spoke Spanish or Spanish Creole and spoke English less than very well. Sharon has a high percentage of Spanish LEP person with 6% of the population. No other language group speaking English less than very well exceeded 1,000 persons or 5% of the regional population.

The city of Torrington, one municipality within our 21-town region, has the region's concentration of LEP individuals. Notably, the State of Connecticut Department of Transportation map titled "Connecticut Statewide Limited English Proficiency (LEP)" map (August 2017) using American Community Survey ACS 2011-2015 5-year estimate identified LEP Populations of 5% or more in Winchester and Torrington with the language of Spanish.

¹ The language calculations used the 2007-2011 5-year American Community Survey (ACS), 5 years and older, Table B16001, as provided by CT DOT.

RESIDENTS OF NORTHWEST HILLS REGION, LANGUAGES SPEAKERS SPEAKING ENGLISH LESS THAN VERY WELL BY LANGUAGE																					
Language Spoken at Home, 2014 Estimates (Source: 2010-2014 American Community Survey)																					
Town*	Population 5 Years+	Spanish or Span./Cr eole	Spanish or Span/Creole %	French incl Patois Cajun Total	French incl. Patois Cajun %	Italian Total	Italian %	Portuguese Total	Portuguese %	German Total	German %	Scandinavian Total	Scandinavian %	Greek Total	Greek %	Russian Total	Russian %	Polish Total	Polish %	Serbo- Croatian Total	Serbo- Croation %
Barkhamsted	3599	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burlington	8651	35	0.688	52	1.332	23	0.519	0	0	14	0.392	0	0	0	0	0	0	20	0.560	0	0
Canaan & Norfolk	2629	0	0	0	0	0	0	0	0	3	0.11	0	0	0	0	0	0	9	0.342	0	0
Colebrook	1341	12	0.89	0	0	0	0	0	0	4	0.298	0	0	0	0	0	0	0	0	0	0
Cornwall	1414	8	0.565	0	0	3	0.212	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Goshen	2896	20	0.690	0	0	0	0	0	0	0	0	0	0	0	0	11	0.379	13	0.448	0	0
Hartland	2050	0	0	2	0.097	6	0.292	0	0	0	0	0	0	7	0.341	0	0	0	0	0	0
Harwinton	5420	22	0.405	9	0.166	29	0.535	0	0	0	0	0	0	13	0.239	0	0	35	0.645	0	0
Kent	2897	0	0	10	0.345	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Litchfield	8090	20	0.247	2	0.024	38	0.469	0	0	63	0.778	0	0	0	0	0	0	6	0.074	0	0
Morris	2336	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
New Hartford	6516	0	0	36	0.552	21	0.322	0	0	0	0	0	0	0	0	0	0	12	0.184	0	0
N. Canaan	3137	104	3.315	3	0.095	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Roxbury	2217	23	1.037	10	0.45	5	0.22	3	0.135	0	0	0	0	0	0	0	0	4	0.180	0	0
Salisbury	3682	18	0.488	7	0.190	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sharon	2675	185	6.915	6	0.224	5	0.186	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Torrington	34369	779	2.266	56	0.162	41	0.119	32	0.093	21	0.061	21	0.061	0	0	28	0.081	50	0.145	29	0.084
Warren	1418	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washington	3428	47	1.371	9	0.262	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Winchester	10674	380	3.560	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Region	176643	2889	1.635	321	0.181	302	0.170	67	0.03	203	0.114	42	0.023	33	0.018	67	0.03	260	0.14719	58	0.032835

RESIDENTS OF NORTHWEST HILLS REGION, LANGUAGES SPEAKERS SPEAKING ENGLISH LESS THAN VERY WELL BY LANGUAGE																					
Language Spoken at Home, 2014 Estimates (Source: 2010-2014 American Community Survey) (CONTINUED)																					
Town		Other Slavic Total	Other Slavic %	Gujarati Total	Gujarati %	Hindi Total	Hindi %	Urdu Total	Urdu %	Other Indic Total	Other Indic %	Other Indo European Total	Other Indo European %	Chinese Total	Chinese %	Korean Total	Korean %	Mon Khmer Cambodian Total	Mon Khmer Cambodian %	Hmong Total	Hmnog %
Barkhamsted	3599	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burlington	8651	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Canaan & Norfolk	2629	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Colebrook	1341	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cornwall	1414	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Goshen	2896	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hartland	2050	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Harwinton	5420	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	0.424	0	0	0	0
Kent	2897	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Litchfield	8090	19	0.234	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Morris	2336	0	0	0	0	0	0	0	0	0	0	29	1.241	0	0	0	0	0	0	0	0
New Hartford	6516	0	0	0	0	18	0.276	0	0	0	0	0	0	0	0	0	0	0	0	0	0
N.Canaan	3137	0	0	0	0	0	0	0	0	0	0	0	0	50	1.59	0	0	0	0	0	0
Roxbury	2217	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Salisbury	3682	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sharon	2675	11	0.411	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Torrington	34369	0	0	16	0.046	0	0	19	0.055	77	0.224	24	0.069	30	0.087288	79	0.229	30	0.087	47	0.136
Warren	1418	0	0	9	0.634	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washington	3428	0	0	0	0	0	0	0	0	0	0	0	0	14	0.408401	0	0	0	0	0	0
Winchester	10674	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Region	176643	49	0.027	41	0.023	18	0.010	38	0.021	154	0.087	77	0.043	124	0.070	204	0.115	60	0.033	94	0.053

RESIDENTS OF NORTHWEST HILLS REGION, LANGUAGES SPEAKERS SPEAKING ENGLISH LESS THAN VERY WELL BY LANGUAGE													
Language Spoken at Home, 2014 Estimates (Source: 2010-2014 American Community Survey) (CONTINUED)													
Town	Population	Thai Total	Thai %	Laotian Total	Laotian %	Vietnamese Total	Vietnamese %	Tagalog Total	Tagalog %	Native N. American Total	Native N. American %	Hungarian Total	Hungarian %
Barkhamsted	3599	0	0	0	0	0	0	0	0	0	0	0	0
Burlington	8651	0	0	0	0	0	0	0	0	0	0	0	0
Canaan & Norfolk	2629	0	0	0	0	0	0	0	0	4	0.152	6	0.228
Colebrook	1341	0	0	0	0	0	0	0	0	0	0	0	0
Cornwall	1414	0	0	0	0	0	0	0	0	0	0	0	0
Goshen	2896	0	0	0	0	0	0	12	0.414	0	0	0	0
Hartland	2050	0	0	0	0	0	0	0	0	0	0	0	0
Harwinton	5420	0	0	0	0	0	0	0	0	0	0	0	0
Kent	2897	0	0	0	0	0	0	0	0	20	0.690	0	0
Litchfield	8090	6	0.074	0	0	0	0	0	0	0	0	0	0
Morris	2336	0	0	0	0	0	0	0	0	0	0	0	0
New Hartford	6516	0	0	0	0	0	0	0	0	0	0	0	0
N. Canaan	3137	0	0	0	0	0	0	0	0	0	0	0	0
Roxbury	2217	0	0	0	0	0	0	0	0	0	0	0	0
Salisbury	3682	0	0	0	0	0	0	0	0	0	0	0	0
Sharon	2675	0	0	0	0	0	0	0	0	0	0	0	0
Torrington	34369	0	0	11	0.032	113	0.328	40	0.116	0	0	41	0.119
Warren	1418	0	0	0	0	0	0	0	0	0	0	0	0
Washington	3428	0	0	0	0	0	0	0	0	0	0	0	0
Winchester	10674	0	0	0	0	53	0.496534	0	0	0	0	0	0
Region	176643	12	0.006	22	0.012	332	0.18	92	0.052	24	0.013	88	0.049
The ACS listed no residents of the following categories that speak "English less than very well": Yiddish, French Creole, Other West Germanic, Armenian, Persian, Japanese, Other Asian, Other Pacific Island, Navajo, Arabic, Hebrew, African or Other unspecified. Norfolk & Canaan combined are one census block.													

B. The frequency with which LEP individuals come in contact with the program.

NHCOG does not offer daily services to the public at large but does have the potential to interact with LEP populations on an infrequent basis. NHCOG staff were interviewed and they responded that, since the organization's formation, they have not received any unsolicited verbal or email requests LEP services yet.

Going forward, announcements for public hearings and requests for comments will invite members of the public to communicate any language assistance they may need. The invitations will also be listed in Spanish.

C. The nature and importance of the program, activity, or service provided by NHCOG to the LEP population.

As NHCOG activities are related primarily to transportation planning, the denial or delay of access to services or information is unlikely to have serious or even life-threatening implications for an LEP individual. Participation by individuals is on a voluntary basis and are not compulsory, a distinction noted in "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Person" Docket No. OST-2001-8696].

However, stakeholder participation, especially by LEP individuals, is important to conduct effective transportation planning. Common services include public outreach sessions, presentations by guests at regular monthly meetings, and production of plans for projects of regional significance.

D. The resources available to the NHCOG

While the percentage of residents speaking English less than very well does not exceed 5% for the region, the number of Spanish speakers, which speak English less than very well, exceeds 1,000 persons. Vital documents such as the Notice to Beneficiaries, Complaint Forms, and Notices of Public Hearings/Meetings will be translated into Spanish as this is a Safe Harbor language. NHCOG will undertake the following efforts:

- a. Census Bureau's Language Identification Flashcards are located at NHCOG Office on the bulletin board with public notices. Personnel receive training in their proper use.
- b. When an interpreter is needed, in person or on the telephone staff will first attempt to determine what language is required by utilizing the I Speak Cards.
- c. For public hearings and meetings hosted and direct by the NHCOG, the following text will be included on all advertising/publications directing the public to the event:

“The meeting facility is ADA accessible. Language assistance may be requested by contacting the NHCOC at 860-491-9884 at least five (5) business days prior to the meeting. Persons having a hearing and/or speech disability may dial 711 for Telecommunications Relay Service (TRS). Language assistance is provided at no cost to the public, and efforts will be made to respond to timely requests for assistance. The NHCOC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities.

Este es un aviso de audiencias públicas sobre [insert hearing topic]. Si usted requiere asistencia lingüística, por favor comuníquese con Consejo de Gobiernos de las Colinas del Noroeste (NHCOC) al (860) 491-9884.”

- d. For public workshops hosted by the NHCOC that are open and informal, the following text will be included on all advertising/publications directing the public to the event:

“The meeting facility is ADA accessible. Language assistance may be requested by contacting the NHCOC at 860-491-9884 at least five (5) business days prior to the meeting. Persons having a hearing and/or speech disability may dial 711 for Telecommunications Relay Service (TRS). Language assistance is provided at no cost to the public, and efforts will be made to respond to timely requests for assistance. The NHCOC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities.

Este es un aviso de audiencias públicas sobre [insert hearing topic]. Si usted requiere asistencia lingüística, por favor comuníquese con Consejo de Gobiernos de las Colinas del Noroeste (NHCOC) al (860) 491-9884.”

At this time, NHCOC has not contracted with an interpreter service. However, NHCOC has contacted New Opportunities to provide potential translators within the community who may attend the meetings should translation be requested.

All NHCOC staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of NHCOC staff orientation process for new hires and will be part of annual staff training updates. Training topics are listed below:

- i. Understanding the Title VI policy and LEP responsibilities;
- ii. What language assistance services NHCOC offers;
- iii. Use of Census Language Identification cards;
- iv. Availability of language services;
- v. Documentation of language assistance requests;
- vi. How to handle a Title VI and/or LEP complaint

The following are a few options that NHCOC will incorporate for LEP outreach:

- i. If staff knows that they will be presenting a topic or hosting a meeting or a workshop in a location with a known concentration of LEP persons, meeting notices, fliers, and agendas will be printed in an alternative language, based on known LEP population in the area.
- ii. When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available.”

When a language assistance request is made, the NHCOC employee receiving the request will complete the Language Assistance form (available in Google Drive or paper copies in the Title VI binder).

5. MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and is one that can be easily updated. At a minimum, NHCOC will review and update the LEP Plan on an annual basis. Complaints will be reviewed immediately as they come in and updates will be made to the LEP prior to the annual review as necessary.

Each update shall examine all plan components such as:

1. How many LEP persons were encountered?
2. Were their needs met?
3. What is the current LEP population in NHCOC service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Is there still a need for continued language assistance for previously identified NHCOC programs?
6. Have the NHCOC’s available resources, such as technology, staff, and financial costs changed?
7. Has NHCOC fulfilled the goals of the LEP Plan?
8. Based on effectiveness, is there need to make adjustments regarding how our programs and services are executed?

On an annual basis or on the occasion of a new hire, NHCOC staff will be trained on how to provide language assistance. Special attention will be paid to any complaints that were received during the previous year.