

Limited English Proficiency Plan

Shoshone County, Idaho

March 13, 2019



Title VI Coordinator
Tamie J. Eberhard, Shoshone County Clerk
700 Bank Street, Suite 120
Wallace, Idaho 83873
(208) 752-1264

A. INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address Shoshone County's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English 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 all Shoshone County departments receiving federal grant funds.

B. PLAN SUMMARY

Shoshone County 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. 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.

In order to prepare this plan, Shoshone County used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Shoshone County.
2. The frequency with which LEP persons come in contact with Shoshone County services.
3. The nature and importance of services provided by Shoshone County to the LEP population.
4. The interpretation services available to Shoshone County and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

C. FOUR-FACTOR ANALYSIS

1. **The number or proportion of LEP persons in the service area who may be served or are likely to require Shoshone County services.**

The Shoshone County staff reviewed the 2010 U.S. Census Report and determined that 173 persons in Shoshone County (1.35% of the population) speak a language other than English. Of those persons, 49 (28.3%) speak English "less than very well."

In Shoshone County, of those person with limited English proficiency, 10 speak Spanish, 13 speak French, 5 speak German, 7 speak Chinese, and 14 speak other and unspecified languages. (Attachment A – Census Bureau 2006-2010 American Community Survey 5-Year Estimates.)

2. The frequency with which LEP persons come in contact with Shoshone County services.

Shoshone County addressed the frequency with which staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, Shoshone County has had no requests for interpreters and no requests for translated program documents.

3. The nature and importance of services provided by Shoshone County to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for Shoshone County. The overwhelming majority of the population, speaks only English. As a result, there are few social, service, professional and leadership organizations within the Shoshone County service area that focus on outreach to LEP individuals. Shoshone County employees are most likely to encounter LEP individuals through office visits, phone conversations, and notifications from staff of impacts on county services.

4. The resources available to Shoshone County, and overall costs to provide LEP assistance.

Shoshone County reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the city would pay a fee.

D. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Shoshone County services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How Shoshone County staff may identify an LEP person who needs language assistance:

- All county departments will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises. (Attachment B – Language Identification Flashcards)

- All Shoshone County departments will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year (Attachment C).

E. TRANSLATION OF DOCUMENTS

Shoshone County weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

F. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities;
- Description of language assistance services offered to the public;
- Use of the Census Bureau Language Identification Flashcards cards;
- Documentation of language assistance requests;
- How to handle a potential Title VI/LEP complaint.

G. HOW A DISCRIMINATION COMPLAINT IS FILED

Complaints may be filed by any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Shoshone County service, program or activity, and believes the discrimination is based upon race, color, national origin, gender, age, disability, economic status or limited English proficiency (Attachment D Complaint Form). Complaints will be handled as follow:

- Complaints accepted in writing only, and may be filed with the Shoshone County Clerk's office;
- The complainant must file the complaint no later than 180 days after the date of alleged act;
- Title VI Coordinator will within ten (10) working days of receiving a complaint, acknowledge receipt of the complaint;
- Title VI Coordinator will investigate and make recommendations for resolving the complaint as deemed appropriate.

H. MONITORING

Shoshone County will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the Shoshone County service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the Shoshone County's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Shoshone County fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

I. DISSEMINATION OF THE SHOSHONE COUNTY LEP PLAN

A link to the Shoshone County LEP Plan is included on the Shoshone County's website www.shoshonecounty.org.

Any person or agency with internet access will be able to access and download the plan from the Shoshone County website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost.

Questions or comments regarding the LEP Plan may be submitted to Shoshone County Title VI Coordinator as follows:

Title VI Coordinator
Tamie J. Eberhard, Shoshone County Clerk
700 Bank Street, Suite 120
Wallace, Idaho 83873
(208) 752-1264 – Office
(208) 752-752-1896 – Fax
Email: teberhard@co.shoshone.id.us

Attachment "A"

Shoshone County Limited English Proficiency Plan

U.S. Census Bureau



B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over
2006-2010 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2010, the 2010 Census provides the official counts of the population and housing units for the nation, states, counties, cities and towns. For 2006 to 2009, the Population Estimates Program provides intercensal estimates of the population for the nation, states, and counties.

	Shoshone County, Idaho	
	Estimate	Margin of Error
Total:	12,307	+/-27
Speak only English	12,128	+/-68
Spanish or Spanish Creole:	45	+/-36
Speak English "very well"	35	+/-31
Speak English less than "very well"	10	+/-13
French (incl. Patois, Cajun):	43	+/-31
Speak English "very well"	30	+/-26
Speak English less than "very well"	13	+/-17
French Creole:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Italian:	17	+/-21
Speak English "very well"	17	+/-21
Speak English less than "very well"	0	+/-119
Portuguese or Portuguese Creole:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
German:	32	+/-23
Speak English "very well"	27	+/-22
Speak English less than "very well"	5	+/-9
Yiddish:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other West Germanic languages:	3	+/-5
Speak English "very well"	3	+/-5
Speak English less than "very well"	0	+/-119
Scandinavian languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Greek:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Russian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119

	Shoshone County, Idaho	
	Estimate	Margin of Error
Polish:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Serbo-Croatian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other Slavic languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Armenian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Persian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Gujarati:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Hindi:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Urdu:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other Indic languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other Indo-European languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Chinese:	7	+/-11
Speak English "very well"	0	+/-119
Speak English less than "very well"	7	+/-11
Japanese:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Korean:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Mon-Khmer, Cambodian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Hmong:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Thai:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Laotian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Vietnamese:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other Asian languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Tagalog:	3	+/-4
Speak English "very well"	3	+/-4

	Shoshone County, Idaho	
	Estimate	Margin of Error
Speak English less than "very well"	0	+/-119
Other Pacific Island languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Navajo:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other Native North American languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Hungarian:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Arabic:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Hebrew:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
African languages:	0	+/-119
Speak English "very well"	0	+/-119
Speak English less than "very well"	0	+/-119
Other and unspecified languages:	29	+/-29
Speak English "very well"	15	+/-22
Speak English less than "very well"	14	+/-21

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

While the 2006-2010 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2006-2010 American Community Survey

Explanation of Symbols:

1. An "***" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "****" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "*****" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

Attachment "B"

Shoshone County Limited English Proficiency Plan

2004 Census Test		United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD		
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողում ես, կամ կարդում ես հայերեն, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/>	ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kahhon ya yangin untungnu' manaitai pat untungnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/>	Mark this box if you read or speak English.	11. English
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກເກົາສາລາວ.	24. Laotian
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

Attachment "C"
Shoshone County Limited English Proficiency Plan

LEP Informal Survey

Date: _____

Department: _____

1. On average, how often do you assist customers with Limited English Proficiency?

_____ times per: ___Day ___Week ___Month ___Year

2. Which language groups do you encounter most frequently when working?

___Spanish ___German ___French ___Unknown ___Other _____

3. Have you ever requested translation or interpretation assistance?

___Yes ___No

This form completed by: _____
(Please print)

Contact phone number: _____

Complete and return this form to Tamie J. Eberhard, Shoshone County Clerk/Title VI
Coordinator, 700 Bank Street, Suite 120, Wallace, ID 83873.

Attachment "D"
Shoshone County Limited English Proficiency Plan

TITLE VI – Complaint Form

Shoshone County, State of Idaho
700 Bank Street, Suite 120
Wallace, ID 83873

Title VI, Civil Rights Act, 1964 states "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance." Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

The following information is necessary to assist us in processing your complaint. Should you require assistance in completing this form, please contact our office.

Date complaint received: _____

1. Complainant's Name (Print) _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Work Phone: _____ Home Phone: _____
5. Person discriminated against (if other than complainant): _____
6. Indicated protected status you believe was basis for discrimination:

___ Race/Color	___ National Origin	___ Low Income
___ Age	___ Marital Status	___ Religion
___ Physical Disability	___ Sex	
___ Mental Disability	___ Limited English Proficiency	
7. What date did the alleged discrimination take place? _____
8. Explain why you believe discrimination has occurred. Please provide dates, location and time of discrimination. If there are witnesses, please provide names, addresses and telephone numbers. Use additional sheets as necessary.

TITLE VI – Complaint Form
Page 2

9. Indicate the person(s) you believe responsible for the discrimination:

Name &

Agency:_____

Work Location (if known):_____

10. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? ___Yes ___No
11. What remedy are you requesting? Please be specific.

12. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Complete and return this form to Tamie J. Eberhard, Shoshone County Clerk, 700 Bank Street, Suite 120, Wallace, ID 83873.