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Kempner Water Supply Corporation

Limited English Proficiency Plan

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Table of Contents

I. Introduction	Page 3
II. Four Factor Analysis	Page 4
III. Language Assistance.....	Page 5
IV. Staff Training	Page 6
V. Translation of Documents	Page 6
VI. Monitoring	Page 6
VII. Dissemination of Kempner Water Supply Corporation's LEP Plan	Page 7

I. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the Kempner Water Supply Corporation (KWSC) 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.

Plan Summary

KWSC 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 do not speak English as their primary language and have limited ability to read, speak, write, or understand English. 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, the system 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 KWSC
2. The frequency with which LEP persons come in contact with KWSC services.
3. The nature and importance of services provided by the KWSC to the LEP population.
4. The interpretation services available to KWSC and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

II. FOUR-FACTOR ANALYSIS

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

KWSC rarely has contact with any individuals that do not speak English. In the rare occasion someone does not speak English, they have a family member (generally their child) interpret the conversation.

KWSC staff reviewed the U.S. Census Report and made several phone calls to different departments within the surrounding cities. No internet census report or city department was able to provide how many persons in KWSC service area and surrounding cities do not speak English.

2. The frequency with which LEP persons come in contact with the KWSC services.

The KWSC staff reviewed the frequency with which Board and office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the KWSC has had no requests for interpreters and no requests for translated program documents. The KWSC Board and office staff have had very little contact with LEP persons.

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

There is no large geographic concentration of any LEP individuals in the service area of KWSC. The majority of the KWSC population, less than 1% of our member/customers do not speak English. As a result, there are few social, service, professional and leadership organizations within the KWSC service area that focus on outreach to LEP individuals. The KWSC Board Members and staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from the staff regarding impacts on services and attendance at Board meetings. KWSC office and field teams rarely have contact with LEP individuals, and in a very rare instance, the member brought their child to speak and write for them.

4. The resources available to KWSC and overall costs to provide LEP assistance.

KWSC 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 found that "Google Translate" worked well for immediate translation needs. KWSC also contacted local citizens that would be willing to provide voluntary Spanish translation for a fee if needed within a reasonable time period.

III. 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 KWSC 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. KWSC currently uses "Google Translate" for oral and written LEP assistance.

Identifying an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand at initial points of contact. KWSC will display HUD's Language Identification ("I SPEAK") cards in the lobby.
- The Board and Office staff will also be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All KWSC staff will be informally surveyed periodically on their experience and frequency concerning any contacts with LEP persons during the previous year.
- The translation may not be able to be provided at every event but can easily be identified as the need for future events.

Language Assistance Measures- The following are our assistance measures:

1. The KWSC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - i. KWSC currently uses "Google Translate" for oral and written LEP assistance.
 - ii. Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire
- Description of language assistance services offered to the public; in person and telephone
- Use of the "ISpeak" cards
- Documentation of language assistance requests

V. TRANSLATION OF DOCUMENTS

- KWSC evaluated 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 is an unnecessary burden to have any documents translated.

Based on the percentage of local LEP population, KWSC does not have a formal outreach procedure in place. When and if the need arises for LEP outreach, KWSC staff will prepare printed material in an alternative language based on the LEP population

VI. MONITORING

Monitoring and Updating the LEP Plan- KWSC will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in the KWSC service area. Updates will include:

- Determine the current LEP population in the service area.
- Determine the current documented LEP person contacts experienced annually.
- Determine whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Evaluate how the needs of LEP persons have been addressed.
- Determine whether KWSC fully complies with the goals of the LEP Plan.

VII. DISSEMINATION OF KWSC LEP PLAN

Post signs at KWSC System Office notifying LEP persons of the LEP Plan and how to access language services.

The above Limited English Proficiency (LEP) Plan was reviewed and adopted by a majority vote of the Board of Directors of the Kempner Water Supply Corporation, at a meeting held on the 22nd day of May 2024.

President, Dennis Kliza