

LIMITED ENGLISH PROFICIENCY PLAN

I. INTRODUCTION AND BACKGROUND

A. POLICY STATEMENT

It is the policy of Lake County to take reasonable steps to provide meaningful access to all individuals who wish to access County services regardless of their national origin or limited ability to speak, read, write, or understand English.

B. WHO IS LIMITED ENGLISH PROFICIENT (LEP)?

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English.

- Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently.
- LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (e.g., medical information, eyewitness accounts, information elicited in an interrogation, etc.) in English.

C. BACKGROUND AND PURPOSE

- Federal law prohibits national origin discrimination and requires federally assisted agencies to take reasonable steps to provide meaningful access to LEP individuals.
- Language barriers can prevent LEP individuals from receiving meaningful access to County services and information.

This Limited English Proficiency (LEP) Plan serves as a broad outline of Lake County's 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, and to meet the legal obligations of, Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.

Lake 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 any County service.

Given the County's wide array of services and extensive federal financial assistance, this plan is not intended to govern all of the specific requirements of the programs which receive Federal funding. Rather, it demonstrates the County's commitment to provide meaningful access to all individuals, regardless of their ability to speak, read, write or understand English.

Numerous Federal Agencies, including the U.S. Department of Transportation, U.S. Department of Justice, and U.S. Department of Health and Human Services, have issued technical assistance and planning tools that are to be used as guidelines in developing comprehensive language access programs. The four-factor LEP analysis was used in preparing this plan.

This plan outlines the ways in which assistance may be provided and how to notify LEP persons that assistance is available. Further, it provides a brief overview of available LEP services and the process for complaint resolution.

D. FRAMEWORK FOR ASSESSING LANGUAGE SERVICE NEEDS

Four-factor analysis:

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

The 2011 American Community Survey 1-Year Estimates provided by the U.S. Census Bureau reports that of Lake County's 660,300 residents, 10.4%, or over 68,000 residents, report being able to "Speak English less than very well". About 71% of those who "Speak English less than very well" speak Spanish. 14.5% speak an Indo-European language, 13% speak an Asian language and less than 1% speaks a language not in the above categories. Appendix A lists "Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Illinois: 2006-2008. No specific language information is available for Lake County only. However, all departments report that Spanish language interpreter services are the most frequently needed and used.

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

Lake County provides a wide array of services, including; voting, courts and criminal justice, extensive health services, highway planning and maintenance, tax collection and many others. Given the wide variety of services provided, frequency will vary for each department. While departments have not been required to document contact with LEP persons, the County's Finance Department reports that contact with the LEP population is rare, while some Health Department clinics estimate such contact as high as 50% of their clients.

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

As noted above, Lake County provides a wide array of services. Lake County staff is most likely to encounter LEP individuals through office visits, contact with the criminal justice system and phone conversations. Attendance at meetings open to the public is less frequent.

4. The resources available to Lake County and overall cost to provide LEP assistance.

Lake County has extensive resources for providing LEP assistance. Many departments that frequently come into contact with LEP persons have bilingual staff in key areas (reception, intake, counseling, clinical settings). Others have access to a listing of Lake County personnel who are willing to act as interpreters in the non-English language they are fluent in. Several departments have documents available in Spanish as well as English. County staff also has the option of using the website [HTTP://translate.google.com/](http://translate.google.com/) to translate English to many languages and vice-versa. Other language translation can be provided through a fee-for-service telephone interpreter line.

Overall cost estimates are difficult to obtain. Only larger departments, with extensive use, isolate expenses for interpreters. For the four departments who isolate interpreter costs, including full and part-time staff, contractors and language line services, annual expenditures in Fiscal Year 2012 were in excess of \$450,000.

II. DEFINITIONS

- Primary Language – The language in which an individual is most effectively able to communicate.
- Interpretation – The act of listening to a communication in one language and orally converting it into another language, while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training, and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.
- Translation – The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.
- Bilingual – The ability to speak two languages fluently and communicate directly and accurately in both English and another language.
- Direct Communication – Monolingual communication in a language other than English between a qualified bilingual Department employee or representative and an LEP individual (e.g., Spanish to Spanish).

III. LANGUAGE ASSISTANCE

LEP individuals will be informed of the availability of language assistance services at the point when it appears that the person is not able to communicate in English. Once identified, staff has the following assistance options available:

- locate an interpreter from within their department
- locate an interpreter from Lake County's list of employees who speak a foreign language
- contact language line or an equivalent telephone interpreter service
- electronic translation programs (Google translate and other smart phone

applications)

Services will be provided at no cost to LEP individuals. Departments with heavy public contact should strongly consider training front line staff that may be the first point of contact for LEP individuals on identification and strategies for assisting the LEP population.

IV. COMPLAINT RESOLUTION

If a person believes they have been discriminated against because of the person's LEP status while applying for or receiving services from Lake County, he/she may file a complaint. Additionally, if an LEP individual disagrees with any action by the County in relation to interpreter services, he/she is encouraged to attempt to resolve the issue informally with the staff person involved and/or a supervisor. If unable to solve at that level, he/she has the right to file a complaint with the Director of Human Resources.

Procedure

Complaints should be addressed to:
Director of Human Resources
18 N. County St., 7th Fl.
Waukegan, IL 60085
847-377-2700

- (1) A complaint should be filed in writing or verbally, containing the name and address of the person filing it, and briefly describing the allegations of non-compliance by Lake County or any actions by Lake County that would be prohibited by federal and state civil rights law.
- (2) A complaint should be filed within 30 calendar days after the complainant becomes aware of the alleged violation. (Processing of allegations of discrimination which occurred before this grievance procedure was in place will be considered on a case-by-case basis.)
- (3) An investigation, as may be appropriate, shall follow a filing of complaint. The investigation shall be conducted by the Director of Human Resources or his/her designee. Such investigations will be informal and thorough, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.
- (4) A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by the Director of Human Resources or his/her designee and a copy forwarded to the complainant no later than 15 calendar days after its filing.
- (5) Human Resources shall maintain the files and records of Lake County relating to the complaints filed.

(6) The complainant can request a reconsideration of the case in instances where he or she is dissatisfied within the resolution. The request for reconsideration should be made within 5 calendar days to the County Administrator.

(7) The right of the person to prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies. Utilization of this grievance procedure is not a prerequisite to the pursuit of other remedies.

(8) These rules shall be construed to protect the substantive rights of interested parties to meet appropriate due process standards and to assure that Lake County complies with federal and state non-discrimination laws related to service delivery.

(9) The Director of Human Resources or his/her designee will submit information about the complaints that are filed with Lake County alleging discrimination in service delivery to the Office for Civil Rights (see below) and any other appropriate State or Federal Agency as required.

Office for Civil Rights
U.S. Department of Health and Human Services
Region V
233 N. Michigan Avenue
Suite 240
Chicago, IL 60601
(312) 886-2359 (Voice)
(312) 353-5693 (TTY/TD)

Appendix A

Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Illinois: 2006-2008
Release Date: April, 2010

	Number of speakers	Margin of Error ¹	Spoke English less than "Very Well"	Margin of Error ¹
Population 5 years and over	11,942,587	1,040	1,164,741	12,358
Spoke only English at home	9,353,214	13,485	(X)	(X)
Spoke a language other than English at home	2,589,373	13,440	1,164,741	12,358
Spoke a language other than English at home	2,589,373	13,440	1,164,741	12,358
SPANISH AND SPANISH CREOLE	1,513,856	8,716	741,572	9,200
Spanish	1,513,856	8,716	741,572	9,200
OTHER INDO-EUROPEAN LANGUAGES	682,572	11,355	265,902	6,552
French	35,871	2,886	7,406	888
French	35,407	2,856	7,406	888
Patois	464	318	(B)	--
French Creole	5,320	1,400	1,453	509
Italian	42,431	2,528	11,753	1,197
Portuguese	5,951	811	1,718	501
Portuguese	5,951	811	1,718	501
German	51,632	2,746	10,269	938
German	51,583	2,750	10,269	938
Luxembourgian	49	56	(B)	--
Yiddish	2,695	1,253	251	128
Other West Germanic languages	5,655	1,109	950	368
Pennsylvania Dutch	1,621	706	388	222
Dutch	3,771	876	534	234
Afrikaans	263	176	28	47
Scandinavian languages	4,760	649	797	368
Swedish	2,589	541	221	105
Danish	1,056	431	359	305
Norwegian	1,005	296	196	118
Icelandic	110	123	21	33
Greek	40,561	3,695	11,061	1,325
Russian	42,984	2,805	22,999	1,767
Polish	199,034	7,518	105,331	4,649
Serbo-Croatian languages	31,655	3,071	13,288	1,647
Serbocroatian	13,178	2,287	6,447	1,256
Croatian	5,682	1,052	1,952	517
Serbian	12,795	1,822	4,889	944
Other Slavic languages	33,726	2,530	14,571	1,454
Bielorussian	173	133	55	70
Ukrainian	12,043	1,309	6,074	953
Czech	5,162	853	1,330	408
Slovak	3,057	711	931	390

Bulgarian	11,277	1,785	5,468	887
Macedonian	1,340	593	434	284
Slovene	674	251	279	147
Armenian	2,108	507	896	321
Persian	6,621	1,278	1,858	597
Hindi	32,324	3,106	8,530	1,420
Gujarati	35,812	2,746	15,538	1,912
Urdu	41,048	3,498	11,796	1,373
Other Indic languages	20,778	2,273	6,883	1,146
India n.e.c. ²	6,186	1,334	2,538	889
Bengali	4,307	1,230	1,252	503
Panjabi	4,767	1,232	1,883	592
Marathi	3,728	926	673	380
Oriya	295	204	63	66
Assamese	137	117	(B)	--
Kashmiri	97	101	26	42
Nepali	379	251	138	136
Sindhi	230	175	77	86
Pakistan n.e.c. ²	345	244	92	110
Sinhalese	303	253	141	124
Romany	4	7	(B)	--
Other Indo-European languages	41,606	3,563	18,554	2,223
Jamaican Creole	481	270	124	119
Krio	115	137	(B)	--
Catalonian	112	115	22	37
Romanian	16,815	2,226	7,790	1,438
Welsh	61	70	(B)	--
Irish Gaelic	1,350	321	205	116
Albanian	5,507	1,294	2,906	908
Lithuanian	14,965	1,810	6,951	1,163
Lettish	1,750	525	415	165
Pashto	308	234	123	124
Kurdish	124	139	(B)	--
Balochi	18	30	18	30
ASIAN AND PACIFIC ISLAND LANGUAGES	294,279	5,300	126,766	3,809
Chinese	76,514	4,115	39,935	2,857
Chinese	52,285	3,727	26,643	2,417
Hakka	14	23	(B)	--
Cantonese	14,191	1,754	8,862	1,230
Mandarin	7,546	1,010	3,182	714
Fuchow	90	145	90	145
Formosan	2,348	573	1,158	342
Wu	40	49	(B)	--
Japanese	13,054	1,259	6,264	799
Korean	48,083	3,572	25,940	2,164
Mon-Khmer, Cambodian	2,608	1,015	1,477	595
Hmong	316	259	95	82
Thai	5,207	848	2,911	558
Laotian	5,298	1,153	2,569	716
Vietnamese	20,337	2,242	12,101	1,641
Other Asian languages	43,519	2,899	11,558	1,555
Azerbaijani	211	221	16	27

Turkish	3,650	761	1,403	484
Mongolian	1,442	683	856	461
Tungus	125	205	125	205
Dravidian	88	112	(B)	--
Telugu	13,823	1,836	2,323	688
Kannada	2,335	738	554	306
Malayalam	11,102	1,707	3,794	932
Tamil	9,550	1,629	1,776	670
Munda	30	48	(B)	--
Tibetan	119	200	102	171
Burmese	769	442	383	249
Karen	208	331	208	331
Miao-yao, Mien	67	72	18	26
Tagalog	74,746	3,393	22,427	1,995
Other Pacific Island languages	4,597	846	1,489	409
Indonesian	1,277	553	388	233
Javanese	4	9	(B)	--
Malay	934	430	395	224
Bisayan	1,025	409	317	199
Sebuano	614	396	251	242
Ilocano	384	207	74	59
Pampangan	45	56	11	19
Chamorro	159	151	23	29
Samoan	60	70	(B)	--
Fijian	24	39	24	39
Hawaiian	71	74	6	9
ALL OTHER LANGUAGES	98,666	5,846	30,501	2,982
Navajo	122	149	(B)	--
Other Native North American languages	1,242	339	239	143
Yupik	101	94	22	36
Cheyenne	31	51	(B)	--
Ojibwa	21	34	(B)	--
Shawnee	43	74	20	35
Coeur Dalene	19	32	(B)	--
Kuchin	82	133	82	133
Kiowa	14	23	(B)	--
Foothill No. Yokuts	24	39	(B)	--
Yuma	32	52	32	52
Crow	41	47	(B)	--
Dakota	112	82	(B)	--
Winnebago	196	138	(B)	--
Choctaw	195	179	12	20
Muskogee	41	48	22	35
Cherokee	115	79	13	21
Arikara	14	24	(B)	--
American Indian	161	100	36	42
Hungarian	3,494	674	1,063	387
Arabic	45,342	3,623	15,253	2,023
Hebrew	5,725	1,058	835	356
African languages	26,155	2,818	6,759	1,622
Amharic	3,378	1,096	1,364	585
Berber	86	119	(B)	--
Chadic	229	201	203	212

Cushite	1,838	1,083	1,636	1,029
Sudanic	88	144	(B)	--
Nubian	51	83	(B)	--
Swahili	1,563	528	192	147
Bantu	1,019	496	137	123
Mande	375	326	16	27
Fulani	514	417	162	168
Kru, Ibo, Yoruba	16,486	2,007	2,992	818
Efik	218	221	(B)	--
Mbum	48	80	(B)	--
African	262	200	57	73
Other and unspecified languages	16,586	2,756	6,352	1,236
Finnish	651	236	130	90
Estonian	106	84	(B)	--
Caucasian	150	134	55	53
Syriac	15,027	2,639	5,905	1,187
Aztecán	210	290	86	138
Quechua	105	135	65	105
Arawakian	306	272	111	130
Uncodable	31	52	(B)	--

¹ 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.

² N.E.C. stands for not elsewhere classified. These are languages where respondents indicated they spoke either INDIAN or PAKISTAN. For Indian, it cannot be determined if the respondent spoke a native American language or spoke a language from India. For Pakistan, respondents wrote in Pakistan but it cannot be determined which one of the languages spoken in Pakistan is actually being spoken. To distinguish these languages, n.e.c. is used to indicate they are not classified in any other language code.

An '(B)' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate.

An '(X)' entry in any column indicates that the question does not apply.

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.

Source: U.S. Census Bureau, 2006-2008 American Community Survey