

LIMITED ENGLISH PROFICIENCY PLAN

Background

The City of Grass Valley is a recipient of Federal financial assistance and acknowledges that as a condition of receiving these funds, it is required to comply with Title VI of the Civil Rights Act of 1964.

Title VI and other nondiscrimination authorities provide that no person shall be excluded, on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U S Department of Transportation.

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 comprehend English is a type of national origin discrimination. It directs each Federal agency to publish guidance for its respective recipients on how their recipients can provide meaningful access to LEP persons in compliance with Title VI regulations. This order applies to all State and local agencies that receive Federal funds.

The City of Grass Valley prepared this Limited English Proficiency (LEP) Plan to address the City's responsibilities as a recipient of Federal financial assistance as it relates to the needs of individuals with limited English language skills. A LEP individual is someone with limited ability to read, write, speak, or comprehend English. The LEP Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, and applicable regulations and guidance documentation. The City will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost to the individual.

Limited English Proficiency Plan Summary

The City of Grass Valley has developed this LEP Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by City.

The LEP 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 inform LEP persons that assistance is available.

The City of Grass Valley is located in the central/western portion of Nevada County, California, approximately 30 miles east of Marysville and about 20 miles north of Auburn and has a population of approximately 13,447 (US Census Bureau: 2024 American Community Survey 5-Year Estimate). Of the 13,447 residents, approximately 5.1% of the residents are Spanish speaking, and 2.7% of the residents are "Other Language" speaking. Of these groups that speak other languages, 76.4% of Spanish and 81.% also speak English very well, leaving only 2.2% of the population that does not speak English very well.

Four-Factor Analysis

Local agencies are required to ensure that Federally-funded programs and activities normally provided in English are accessible to LEP Persons. Each local agency shall perform an annual

assessment to determine if modifications are needed to their programs and activities to ensure meaningful access by LEP persons. The assessment which is referred to as a “Four-Factor” analysis is based on the following factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered.
- The frequency of LEP contacts.
- The nature and importance of the programs, services, or activities provided by the City of Grass Valley.
- The resources available for LEP persons

Factor 1. The number or proportion of LEP persons eligible to be served or likely to be encountered.

Grass Valley has approximately 13,447 residents. 301 (2.2%) of residents in Grass Valley are considered LEP persons, with the majority of those LEP persons primarily speaking Spanish (692, 5.1% of the community) and Other Languages (368, 2.7% of the community).

Factor 2. The frequency of LEP contacts.

No data has been collected regarding frequency of contact with LEP persons at the City. Most interactions with LEP persons occur at the City’s “front-counter” due to residents paying utility bills or inquiring about a permit. Based on observation from front-counter staff, the frequency for translation from Spanish to English is on average twice per year. Currently the City retains a list of which City staff are available as translators for various languages. If front counter staff are not available to assist a LEP person, City staff will reach out to a translator from the list.

Public Works staff does not regularly receive requests for translation through Federally funded programs/projects, though the outreach components of said programs/projects do typically have multi-lingual resources. Further, if translation services are needed, staff will provide said translation in a timely manner.

Factor 3. The nature and importance of programs, services, or activities provided by the City of Grass Valley.

From observation provided by Public Works staff, it is rare that translation services are requested for programs, services, or activities which are Federally-funded. As stated above, the front counter Staff are the ones who most frequently encounter LEP persons requesting and/or needing translation services.

Though Public Works Staff has received very few requests for translation services on Federally-funded projects, programs and services, Staff is aware that approximately two percent of the City’s residents are LEPs and therefore it is possible that LEPs will be a stakeholder in its projects, programs and services.

Factor 4. The Resources Available for LEP persons.

After a review of the City’s currently available resources for LEP persons, the City has determined that the current available resources are sufficient to address the limited number of LEP Persons expected to require language translation services on a regular basis. The

City will continue to evaluate the resources available to assist LEP persons will update its services and information as technology or demographics change.

Limited English Proficiency Plan Outline

How City staff may identify a LEP person who needs language assistance:

1. Collect and examine records of language assistance requests (such as call logs from public counters, dispatch, and the general information line) to predict the need for language assistance at future events or meetings
2. Collect demographic data to determine LEP assistance in our service areas
3. Survey employees and contractors to record the frequency and type of language assistance requests made by customers

The City will modify outreach strategies based on information gathered and survey results.

Language Assistance Measures

The City has numerous language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which City staff and contractor staff respond to LEP persons, whether in person, by telephone, or in writing, including:

- Printed brochures, service notices, and other vital documents in languages as needed
- Bilingual staff that can assist clients in languages other than English
- Assistance to LEP persons at public events as needed
- City Internet website content is capable of being translated into approximately 100 languages

Staff Training

The following training is provided to City staff:

1. Overview of Title VI Policy and LEP Plan
2. Review of language assistance services offered to the public
3. Review of how to document language assistance requests
4. Review of how to handle a potential Title VI/LEP complaint

Outreach Techniques

When staff prepares materials or schedules a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, and agendas will be printed in an alternative language based on the identified LEP population.

Interpreters may also be available as needed for public meetings and through a contracted call center.

Monitoring and Updating the LEP Plan

To ensure continuous compliance, the City will review and update the Title VI Implementation Plan and Limited English Proficiency Plan every three years or when it is clear that higher

concentrations of LEP individuals are present. As new regulations are created, the City will act promptly to update the existing plans and relevant resources.

The City will ensure that all future projects and planning documents that are federally-funded utilize outreach methods that are compliant with Title VI and other related non-discriminatory assurances.

Dissemination of Title VI Policy and Limited English Proficiency Plan

The City website includes its Non-Discrimination Policy Statement, Notice to Public, Complaint Form, and this Limited English Proficiency Plan at www.grassvalleyca.gov/TitleVI. Any person or agency with Internet access may access and download the documents from the website.

A copy of the documents may be also requested by any person or agency via telephone, fax, mail, e-mail, or in person and a copy of the documents shall be provided at no cost.