

**Limited English Proficiency
Four Prong Analysis
And
Language Assistance Plan**

**County of Morris Department of Human Services, Division of Community
and Behavioral Health, Office of Community Development
December 2019**



Limited English Proficiency

It is the policy of the County of Morris Division of Community Development to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). LEP individuals are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English.

Executive Order 13177 “Improving Access to Services for Persons with Limited English Proficiency” directs Federal agencies to examine the services it provides and develop and implement a system by which LEP persons can access those services.

In order to comply with Executive Order 13177, the County is conducting a Four Prong Analysis to assess Limited English Proficiency (LEP) and develop a Language Assistance Plan (LAP).

The analysis includes the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the office of Community Development.
2. The frequency with which LEP individuals come into contact with the program.
3. The nature and importance of the program, activity or service provided by the program to people’s lives.
4. The resources available to the grantee/recipient and costs.

Factor 1 – Number or proportion of LEP persons served or encountered in the eligible service area

Using Table S1601 for 2017 - LANGUAGE SPOKEN AT HOME from the US Census Bureau, the County of Morris Division of Community Develop found that 5.9% of all county residents over age 18 speak English less than very well. This data includes the Township of Parsippany-Troy Hills which participate in the County HOME consortium but not the CDBG Urban County. The number of Spanish-speaking adults speaking less than very well is 8,684 (2.5%) and other languages 12,234 (3.5%).

Total population 18 years and over	354,414
Total LEP population 18 years and over	20,918
Spanish speaking LEP population 18 years and over	8,684
Asian and Pacific Islander language speaking LEP population 18 years and over	7,191
Other Indo-European language speaking LEP population 18 years and over	10,456
Other language speaking LEP population 18 years and over	654

The above data demonstrates that more than approximately one-third of the jurisdiction’s LEP population is Spanish speaking. Other language groups with 1,000 or more speakers with limited English proficiency include:

Polish	1,031 (.2%)
Gujarati	3,159 (.7%)
Chinese – Mandarin and Cantonese	3,166 (.7%)
Other Asian	1,355 (.3%)

Fact 2 – Frequency of contact with the program

As per the Senior Cost Estimator of the Rehab program, approximately one Spanish-speaking LEP individual contacts this office a month.

The County also provides loans/grants to various housing development entities and to non-profit service providers, including Emergency Shelters, homeless prevention and Rapid Re-housing. A survey of these providers shows that the predominant language that agencies and programs come into contact with is Spanish; any other language is rare.

Fact 3 – Importance of service, information, program or activity

The federally-funded program administered by the Community Development office that LEP individuals are most likely to come into contact with is our Homeowner Rehab program. This program is important as it contributes to the retention of affordable housing inventory in the county.

Services provided by the County include emergency housing services that are partially funded with Emergency Solutions Grant funds. Further subrecipients provide public services including assistance to persons who are homeless or near homeless, youth programs, case management and special needs housing. Developers participating in the HOME program provide affordable housing to lower income households.

Factor 4 - Costs versus resources and benefits

The Office of Community Development has worked to make its programs accessible to Spanish-speaking individuals. For the Homeowner Rehab program, a Spanish version of the program's brochure is available in hard copy and on the Division's website.

Interpretation Services

The County's Office of Temporary Assistance, which is also a subrecipient in the Emergency Solutions Grant program, has staff who speak Spanish. If need be, the Office of Community Development would reach out to OTA for interpretation assistance.

In the event that interpretation is requested and a native language speaker is not available on staff, the County or subrecipient will utilize an on-demand live interpretation phone or online service. These services allow customers to pay for interpretation services by the minute. A list of interpretation service providers is included as Exhibit 1. This list will be distributed to all staff and subrecipients who may interact directly with LEP individuals who are interested in obtaining assistance through CDBG, ESG or HOME programs.

LANGUAGE ASSISTANCE PLAN

Plan Statement

The Office of Community Development is committed to providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws. Equal opportunity includes physical and program access for persons with disabilities and program access for persons with Limited English Proficiency (LEP). In order to provide meaningful access to its programs and activities by persons with Limited English Proficiency, The Division has adopted this Language Assistance Plan (LAP).

This Plan is based on HUD's suggested four-prong analysis, which examines the number of limited English proficiency persons served, the frequency with which those persons come into contact with services, the nature and importance of services provided and the costs to the Division's programs.

The Division shall, in accordance with federal guidelines, make reasonable efforts to provide language access services to populations of persons with LEP who are eligible to be served, including applicants for its Homeowner Rehab program.

I. Who is LEP?

For the purposes of this LAP, anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English may be LEP.

The County of Morris will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

I. Identification of Languages Needs Within the Jurisdiction

It was determined through review of the U.S. Census Bureau's American Fact Finder, as recommended by the U.S. Department of Housing and Urban Development (HUD), that Spanish was the only language to meet the 4 factor analysis criteria (1 – Number or proportion of LEP persons served or encountered in the eligible service area; 2 – Frequency of contact with the program; 3 – Importance of service, information, program or activity; 4 - Costs versus resources and benefits) requiring translation of vital documents, this was supported by the volume of encounters with LEP persons where virtually all were Spanish speaking.

According to Fact Finder, there are over 20,000 persons over the age of 18 years in Morris County who speaks English less than very well. Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be serviced or likely to be affected or encountered. The County of Morris has determined that although there

are more than 1,000 Spanish-speakers who speak English less than very well in several languages, the Spanish-speaking community of the county are the only ones that have regular and frequent contact with local service providers and the county. Therefore, The County of Morris will translate vital documents into Spanish.

The largest LEP populations were persons who speak Gujarati (Northern India) and Chinese languages. There were also more than 1,000 Polish-speakers who speak English less than very well. These populations constitute two-thirds of all LEP persons in the county. However, collectively they account for less than 1% of the county population and have not been identified as persons who access services from the County or its service providers. When requested, items will be translated for these populations into the language requested.

Other languages groups in Morris County had few LEP persons and therefore did not meet the threshold to require written translation of vital documents into those languages. The County of Morris will provide oral interpretation as needed to LEP persons requesting such services.

II. Written Translation

As stated above, the County of Morris has determined that because there are more than 1,000 Spanish-speakers in the County who speak English less than very well, the County of Morris will translate vital documents into Spanish. As of the date of the creation of this LAP, Spanish is the only language into which vital documents will be translated. This is subject to change upon review of the LAP as discussed below.

A. Vital Documents

HUD has defined “vital documents” to be those documents that are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and LEP persons specifically. In general, the County of Morris will attempt to translate all letters sent to program applicants and participants to Spanish.

- Housing Rehabilitation application and advertisements
- General Program Announcements: Public Notices for Hearings and Consolidated Plan, Annual Plan and CAPER display periods, Substantial Amendments and other administrative policy changes.
- Continuum of Care No Wrong Door Coordinated Entry

III. Oral interpretation

The County of Morris will make every effort to provide oral interpretation for all its clients who have identified themselves as LEP and request services. Interpretation services will be provided when necessary for meaningful access for LEP clients. The County’s Office of Temporary Assistance, which is also a subrecipient in the Emergency Solutions Grant program, has staff

who speak Spanish. If need be, the Office of Community Development would reach out to OTA for interpretation assistance.

Clients may wish to use family members, friends, legal guardians, service representatives, etc. as informal interpreters. The use of these informal interpreters is acceptable to the Community Development office; however, an LEP client has the right not to be required to rely on their minor children, other relatives, or friends as interpreters.

In the event that interpretation is requested and a native language speaker is not available on staff, the County or subrecipient will utilize an on-demand live interpretation phone or online service. These services allow customers to pay for interpretation services by the minute. A list of interpretation service providers is included as Exhibit 1. This list will be distributed to all staff and subrecipients who may interact directly with LEP individuals who are interested in obtaining assistance through CDBG, ESG or HOME programs.

IV. Outreach

The County of Morris will conduct outreach in a method that is inclusive of LEP persons identified through its bi-annual analysis. All Public Notices and marketing advertisements shall be published in Spanish as well as English, and the County of Morris will circulate flyers in Spanish and English to local agencies for display since there is no local Spanish media. The County of Morris may also participate in community-sponsored events, and make presentations through community organizations to target LEP persons and ensure they are aware of the availability of LEP assistance.

For clients who are LEP but are not Spanish-speaking, the office receptionist has a document created by the US Census Bureau translated into 38 different languages to use as a tool to identify the client's primary language. The County of Morris has posted a notice announcing the availability of primary language assistance into as many languages as possible in the lobby.

V. Staff Training

The County of Morris will provide a copy of this LAP to all existing staff, and will also provide training as to its contents and what is required of them under its policies. This training shall include the types of services available to clients and how to access them. New employee will receive this LAP and the same training as part of their orientation.

VI. Monitoring and Updating of This LAP

An assessment of the LEP Plan will be undertaken annually, at the time of the CAPER, to ascertain whether population changes have occurred which would necessitate a reevaluation of the language assistance provided. A determination will be made as to new language needs have emerged, necessitating translation and interpretation.

VII. LAP Plan Distribution

The Language Assistance Plan will be distributed to the Office of Community Development

Staff. In addition, the Plan will be available on the Office of Community Development's website at [http:// www.MorrisHuman Services.org/community](http://www.MorrisHumanServices.org/community)

Patricia Reid, Private Secretary, has been designated as the Office of Community Development's Limited English Proficiency Coordinator. Ms Reid can be reached on weekdays from 8:00 AM – 4:00 PM at 973-285-6060.

Exhibit 1: Definitions

Limited English Proficiency: Individuals who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English may have limited English proficiency, or "LEP." These individuals may be entitled to language assistance with respect to certain types of services, benefits, or encounters.

Language Access Plan: A Language Access Plan is the guiding document that ensures access to programs is provided to individuals that may have limited English proficiency, and that the resources to do so are available.

Four-Factor Analysis: A Four-Factor Analysis is a component of a Language Access Plan. The Analysis sets forth the steps an organization should take to determine how it will provide meaningful access for LEP individuals so that their federally-funded programs meet the requirements of the law.

A threshold consideration in a Four Factor Analysis is that the recipient or subrecipient of federal funds takes "reasonable" steps to ensure "meaningful" access to the planning processes and written materials provided through various federally-funded programs. As outlined in official HUD guidance:

"This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations.

The Four Factor Analysis includes:

1. The number or proportion of LEP persons served or encountered in the eligible service population
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available and costs to the recipient.

Translation: Translation services are a more deliberate process, where written text is translated from the source language, in this case English, to other languages.

Interpretation: Language interpretation services provide real time, oral interpretation from one language to another. This is done with an interpreter orally translating a conversation or meeting live, and in-person.

Exhibit 1 – language referral services

Language Translation, Inc.

<http://www.languagetranslation.com/>
619.400.4502
info@languagetranslation.com

ALTA Language Services

<https://www.altalang.com/get-started/interpretation/opi/>
404.920.3860 / 888.302.4455
interpretation@altalang.com

*LangCommLive**

<http://langcommlive.com/>
844.329.7088
enquiries@LangCommLive.com

LanguageLine Solutions

<https://www.languageline.com/>
800.752.6096
customercare@languageline.com

*Volatia Language Network**

<https://volatia.com/Clients/Services/OverThePhone>
1.877.865.2842
customerservice@volatia.com

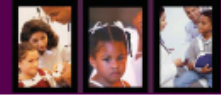
*WorldWide Interpreters**

<https://www.worldwideinterpreters.com/interpretation/phone-interpreters/>
866.967.5313
support@e-wwi.com

* These providers require registration prior to utilizing their services.

Exhibit 2: Language Identification Guide and “I Speak Spanish” Card and Lobby Poster

I SPEAK ...



ARABIC	أنا أتحدث اللغة العربية	FRENCH	Je parle français	LAOTIAN	ຂ້າພວມເວົ້າລາວ	SPANISH	Yo hablo español
ARMENIAN	Ես խոսում եմ հայերեն	FRENCH CREOLE (HAÏTIAN CREOLE)	M pale kreyòl ayisyen	LITHUANIAN	Aš kalbu lietuviškai	SWAHILI	Ninaongea Kiswahili
BENGALI	আমি বাংলা কথা বলতে পারি	GERMAN	Ich spreche Deutsch	MANDARIN (CHINESE)	我讲普通话/普通话	SWEDISH	Jag talar svenska
BOSNIAN	Ja govorim bosanski	GREEK	Μιλώ τα ελληνικά	NORWEGIAN	Jeg snakker norsk	TAGALOG	Marunong akong mag-Tagalog
BULGARIAN	Аз говоря български	GUJARATI	હું ગુજરાતી બોલું છું	POLISH	Mówi' po polsku	THAI	พูดภาษาไทย
BURMESE	ကျွန်ုပ်တို့က မြန်မာစကား ချောတယ်	HEBREW	אני מדבר עברית	PORTUGUESE	Eu falo português do Brasil (Brasil)	TURKISH	Türkçe konuşurum
CAMBODIAN	ខ្ញុំនិយាយភាសាខ្មែរ	HINDI	मैं हिंदी बोलती हूँ।		Eu falo português do Portugal (Portugal)	UKRAINIAN	Я розмовляю українською мовою
CANTONESE (CHINESE)	我講廣東話	HMONG	Kuv has lug Moob	PUNJABI	ਮੈਂ ਅੰਗਰੇਜ਼ੀ ਬੋਲਦੀ/ਬੋਲਦੀ ਹਾਂ।	URDU	میں اردو بولتا ہوں
CROATIAN	Govorim hrvatski	HUNGARIAN	Beszélek magyarul	ROMANIAN	Vorbesc românește	VIETNAMESE	Tôi nói tiếng Việt
CZECH	Mluvim česky	ITALIAN	Parlo italiano	RUSSIAN	Я говорю по-русски	YORUBA	Mo nso Yooba
DUTCH	Ik spreek het Nederlands	JAPANESE	私は日本語を話す	SERBIAN	Ja govorim српски		
FARSI (PERSIAN)	من فارسی صحبت می کنم	KOREAN	한국어 합니다	SLOVAK	Horim po slovensky		

* Registrars should use this tool to guide patients in identifying their spoken language when they do not speak English or ASL.
 Source: Adapted from the State of Ohio Office of General Justice Services and recommended by the US Department of Health & Human Services - Office of Civil Rights for usability research facilities



County of Morris, NJ

Morris County Human Services



Free Interpreter services are available.
Please ask someone at the front desk.



Вы можете воспользоваться бесплатными услугами переводчика.
Попросите об этом в приемной. Russian

Tenemos a su disposición servicios de intérpretes gratuitos. Spanish
Si está interesado, por favor solicítele ayuda a la recepcionista.

Adeegyada tarjumaada oo lacag la'aan ah ayaad helaysaa.
Fadlan weydii qofka fadhiya miiska soo dhoweynta. Somali

ມີລ່າມແປພາສາລາວ ໄວ້ຄອຍບໍລິການຟຣີ
ກະຣຸນາ ສອບຖາມນຳ ພະນັກງານຮັບຕ້ອນ ຢູ່ທາງເຂົ້າ Lao

خدمات ترجمة متوفرة مجاناً
فضلاً ا سأل الشخص الذي في غرفة الا استقبال.
Arabic

ការជួយបកប្រែភាសាដោយឥតគិតថ្លៃ។
សូមសួរអ្នកអង្គុយនៅតុខាងមុខ Khmer/Cambodian

Yog koj xav tau tus neeg pab txhais lus dawb.
Qhia rau tus neeg nyob ntawm qhov rooj paub. Hmong

Hiện có dịch vụ thông dịch viên miễn phí.
Xin vui lòng hỏi người tại bàn giấy mặt tiền. Vietnamese

Besplatne usluge prevodioca su dostupne.
Informacije možete dobiti na recepciji. Serbo-Croatian

Tajaajilli afaan hiikuu tolaa ni jira.
Nama fuuldura taa'u gaafadhaa. Oromo

ATTACH DATA from CENSUS -