

Limited English Proficiency (LEP) Plan City of Topeka, Kansas

The intent of Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" (65FR 50121) is to reduce language barriers and improve access to programs receiving federal funds, especially by persons who are limited in their English proficiency. The City of Topeka will identify barriers to LEP individuals and implement a language assistance plan which will reduce language barriers and enhance access to our services by persons with Limited English Proficiency.

Four Factors Analysis for Topeka and Shawnee County

1. Number and Proportion of LEP individuals who can utilize the services provided by the City of Topeka.

Data and information obtained from the American Community Survey (ACS) 2021 shows the Limited English Proficiency (LEP) Population Groups residing in Shawnee County. All of the following information comes from the ACS 2021 survey. The 6,663 Spanish speakers who speak English "less than very well" represent 4% of the Shawnee County population and meets the criteria for providing written translations of all materials. According to the ACS 2021, there are 7,658 people who are foreign born and are residents of Shawnee County who may need language assistance. We do, however, encounter these persons as we provide public services, and our LEP Plan is developed with them in mind as well as the many Spanish speakers.

2. Identify the frequency in which LEP individuals come into contact with the City of Topeka.

About 7,658 residents of the Shawnee County population are foreign born and 13,843 or 8.2% speak other language other than English. As this sector of the population seeks city services, we know from experience that many have limited English proficiency.

While no other population or language group meets the LEP threshold for mandatory translation of all materials, we do encounter many individuals with limited English proficiency. Topeka and Shawnee County is home to large manufacturing employers and these employers recruit internationally to address the labor force demand. Many new immigrants with limited English proficiency come to our community for these jobs, and many seek city services.

3. Identify the importance of City services to the LEP community.

As new immigrants to the United States, and new job holders in our community, many LEP individuals know little to no English. The City of Topeka is committed to providing timely, meaningful access to its programs and services for individuals with limited ability to read, write, speak, or understand English ("LEP persons"). In order to reduce barriers posed to LEP persons, the City will make language access services available at no cost to individuals applying for, receiving, or participating in any City program, services, or benefits.

4. Identify resources available for assisting LEP individuals and the respective costs of these resources.

Resources for Spanish Speakers: Spanish is the most common language spoken by our LEP population and meets the Title VI threshold requiring that translations be available in Spanish. Therefore, we have developed a number of different resources.

- Translations: All essential documents are available in English and Spanish, including:
 - City Policies and Guidelines
 - All public notices posted in city owned property
 - Title VI Notice, Complaint Form and Complaint Procedures

Cost: For documents containing complex language requiring high level Spanish – English proficiency, we utilize the services from professional translator services and certified bilingual city staff.

- Bilingual Staff: We have multiple bilingual staff throughout city departments. When communication difficulties arise, staff calls to seek the assistance from the bilingual staff. When recruiting new staff some positions' job advertisement notes that 'bilingual skills are strongly preferred but not required'.

Cost: Bilingual staff members in the City of Topeka are paid based on proficiency because of this important skill. There is also a cost in terms of the time these staff members spend dealing with communication difficulties encountered by staff members who do not have bilingual skills.

- "MANGO Languages": To provide an additional resource our staff has access and are encouraged to utilize "MANGO Languages", a service offered at no cost through our local public library. MANGO Languages provide multiple languages and focuses on intuitive language construction through a conversation-based methodology that reinforces grammar, vocabulary, culture, and pronunciation.

Cost: Service is free with a library card or membership.

Resources for Speakers of other Languages: because we have residents who speak different languages (neither English nor Spanish) we have identified a resource we can utilize to assist when working with these clients.

- Pay as You Go Personal Interpreter Service: An additional resource we can utilize for simultaneous telephone translation in any language is the Pay- as-You-Go Interpreter Service provided by Language Line (www.language.com). When an LEP client calls or visits our office, this service can be utilized by calling their number and asking for a specific language interpreter. The interpreter joins in a 3-way telephone conversation and provides simultaneous translation between the caller and our staff. This resource can be especially valuable with LEP clients who speak a language other than Spanish, because we have no staff members who speak languages such as Arabic, Somali, or Laotian. It is possible to have documents translated if needed.

Cost: \$3.95 per minute for audio calls and \$4.95 per minute for video calls.

Limited English Proficiency Plan

Identified LEP Individuals The 6,663 Spanish speakers who speak English “less than very well” represent 4% of the Shawnee County population and meets the criteria for providing written translations of all materials.

Language Assistance Measures In order to meet the needs of all LEP populations we will take the following steps.

For LEP Spanish Speakers: We will take the following actions:

- Translate all documents into Spanish, utilizing City staff when possible and hiring professional translators when necessary. This includes:
 - City Policies and Guidelines
 - All notices posted in city owned property
 - Title VI Notice, Complaint Form, and Complaint Procedures
- Use available translation engines or other services to enable our website to be translated and presented in Spanish.
- Make every effort to recruit and hire bilingual staff who speak Spanish or other languages.
- Provide staff additional resources to practice other languages and increase proficiency with programs such as “MANGO Languages” offered through our public library and utilize training videos when the opportunity arises.
- Utilize Pay-As You-Go Personal Interpreter and Translation Service (www.languageline.com) when necessary.

For LEP Speakers of Other Languages:

- Use available translation services/engines to enable LEP individuals to translate our Website information into their native language.
- Utilize Pay-As You-Go Personal Interpreter and Translation Service (www.languageline.com)
- The City of Topeka counts with other certified bilingual staff that speaks other languages other than English and Spanish.

Training Staff – Identify how agency staff will be trained in utilizing language assistance measures.

- Per policy, our bilingual staff is required to take a proficiency test in order to receive bilingual pay and be certified.
- Our city staff will be trained in how to utilize Pay-As You-Go Personal Interpreter and Translation Service (www.languageline.com).
- We will collaborate with community organizations and education institutions to assure that staff has the skills needed to meet the communication challenges with all LEP language groups.

Providing Notice - Identify how the City of Topeka will provide notice of the LEP plan and the Title VI procedures.

- LEP Plan will be posted on the City’s website.
- LEP Plan will be provided to any person or agency requesting a copy.
- The office to contact in regard to the LEP plan is the Diversity Equity and Inclusion Office and can be reached at 785-368-3917 or deioffice@topeka.org

- On our website we will post "If a Complaint Procedures posted on this website"

Monitoring and Updating LEP Plan – The City of Topeka will take the following actions to monitor and update the LEP Plan:

- At a minimum, our agency will update the LEP Plan every three years as required by the Title VI update schedule.
- We will examine the LEP Plan annually as new staff is being hired and trained in order to assure we are carrying out the plan to the fullest extent.

If large number of LEP individuals present us with new challenges (e.g. a new language is introduced into the community), we will examine the LEP Plan to determine if any changes might be necessary, or any resources might be utilized which we had not known about previously.