



Geer Limited English Proficiency (LEP) Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Geer's 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, Federal Transit Administration Circular 4702. 1A dated May 13, 2007, 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 federal 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

The Geer campus provides a variety of services to our rural area communities. Geer has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Geer. As defined in 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, and the ways in which assistance may be provided.

LEP Assistance

The Geer campus assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that Geer could partner with for outreach and translation efforts. The amount of staff training that might be needed was also considered.

Geer developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

Geer staff may identify an LEP person who needs language assistance:

1. Have Census Bureau Language Identification Flashcards available to identify persons who may need this service.
2. Have Census Bureau Language Identification Flashcards on all Geer campus vehicles to assist vehicle operators in identifying specific language assistance needs of passengers.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on Geer's programs and services;
- A list of volunteers for various languages will need to be developed.
- Survey front-line staff annually on their experience concerning any contacts with LEP persons during the previous year;
- Post the Title VI Policy and LEP Plan on Geer's website, www.geercares.org

Staff Training

The following training will be provided to Geer staff:

1. Use of Language Identification Flashcards
2. Documentation of language assistance requests
3. How to handle a potential Title VI/LEP complaint

Monitoring and Updating the LEP Plan

Geer will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the 2013 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Geer service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether Geer's financial resources are sufficient to fund language assistance resources needed
- Determine whether Geer has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning Geer's failure to meet the needs of LEP individuals

Dissemination of the Geer Campus LEP Plan

A link to Geer's LEP Plan and the Title VI Procedures will be included on the www.geercares.org website.

Any person or agency with internet access is able to access and download the plan from the Geer website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost.

Questions or comments regarding the LEP Plan may be submitted to Geer's Title VI Coordinator:

Kevin O'Connell, Campus Administrator

Geer

99 South Canaan Road

Canaan, CT 06018

860-824-1474

Fax: 860-824-5137

www.geercares.org