



Limited English Proficiency (LEP) Plan

COUNTY OF GREENE

Signed by:


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INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the **COUNTY OF GREENE'S** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which states 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*, states that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination which is covered under Title VI. It directs each agency (e.g., FHWA) to publish guidance for its respective recipients (e.g., NYSDOT) clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds and extends to its sub recipients.

Plan Summary

The **COUNTY OF GREENE** 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 services provided. As defined by 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, the ways in which assistance may be provided, staff training that may be required, and notification to LEP persons regarding the availability of assistance. For detailed guidance regarding LEP, see NYSDOT's LEP Plan at:

[https://www.dot.ny.gov/divisions/policy-and-strategy/public-trans-respository/Attachment%20D-1%20LEP Plan.pdf](https://www.dot.ny.gov/divisions/policy-and-strategy/public-trans-respository/Attachment%20D-1%20LEP%20Plan.pdf).

In order to prepare this plan, the **COUNTY OF GREENE** used the Federal Highway Administration (FHWA) Four-Factors LEP analysis:

1. The number or proportion of LEP persons in the service area who may be served by **COUNTY OF GREENE**.
2. The frequency with which LEP persons come in contact with **COUNTY OF GREENE** services
3. The nature and importance of services provided by **COUNTY OF GREENE** to LEP populations
4. The interpretation services available to **COUNTY OF GREENE** and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is found in the following section

MEANINGFUL ACCESS: FOUR-FACTORS ANALYSIS

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

The COUNTY OF GREENE staff reviewed the American Community Survey 5-Year Estimates and the 2024 NYS Office of General Services Language Diversity Data for Greene County and determined that:

- a. 3,351 individuals in COUNTY OF GREENE service area comprising 7.4% of the population] speak a language other than English;
- b. Of those, 987 individuals have limited English proficiency; that is, they speak English less than "very well" or "not at all." This is only 2.05% of the overall population in the service area;
- c. In COUNTY OF GREENE service area, of those persons with limited English proficiency:
 - ____% speak German
 - 49 % speak Spanish
 - 12 % speak African languages
 - 1 % speak Chinese
 - ____% speak Serbo-Croatian
 - ____% speak Scandinavian
 - .5 % speak Japanese
 - 6 % speak Russian
 - 1 % speak other Indic languages
 - ____% speak Vietnamese
 - 4 % speak French
 - ____% speak Tagalog
 - ____% speak other Slavic languages
 - 26.5 % speak Arabic, Indo-European languages
 - ____% speak Native North American Languages
 - ____% speak all other language

2. The frequency with which LEP persons come in contact with COUNTY OF GREENE services

COUNTY OF GREENE reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

- a. From 1/1/2019 through and inclusive of 12/31/2024, Greene County staff has provided Language Line translation services to LEP individuals at a combined cost of \$10,004.80, representing \$7,776.00 for 10,368 minutes of telephonic translation services and \$2,228.80 for 1,754 estimated minutes of virtual video translation time. As the total LEP population of Greene County is 2.05% and thus less than the 5% threshold, Greene County is not required to submit a complete LEP plan at this time. Notwithstanding the aforementioned percentages, the vast majority of Language Line translations are necessitated by calls received from LEP individuals by the Greene County Emergency Services 911 Call Center which is a subscriber to Language Line translation services.

- b. Other Greene County departments' staff have limited contact with LEP persons. Notwithstanding said limited contact, Greene County Department of Social Services, Greene County Department of Public Health, Greene County Department of Human Services, Greene County Department of Emergency Services and Greene County Department of Mental Health have direct access to Language Line which is capable of interpreting as many as 427 languages. All other Greene County Departments have access, through the aforementioned departments, to the Language Line translation service should the need arise.

3. The nature and importance of services provided by COUNTY OF GREENE to the LEP population

There is a very low concentration of LEP individuals in the geographic service area for **COUNTY OF GREENE**. The overwhelming majority of the population, 97.95 %, speaks only English. Accordingly, few social service or professional and leadership organizations exist within **COUNTY OF GREENE** geographic area because a sizeable LEP population does not exist. **COUNTY OF GREENE** staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from Department staff regarding public issues and concerns and at public meetings.

4. The resources available to COUNTY OF GREENE, and overall cost to provide LEP assistance

COUNTY OF GREENE reviewed its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are suitable for translation if the need arises.

See response to No.: 3 above.

LANGUAGE ASSISTANCE

A person who does not speak English as her primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be eligible for language assistance services from **COUNTY OF GREENE**. Language assistance can include interpretation (oral or spoken transfer of a message from one language into another language) and translation (written transfer of a message or text from one language to another).

How **COUNTY OF GREENE** staff can identify an LEP person in need of language assistance:

- Post notices of the LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons can understand.
- Provide **COUNTY OF GREENE** staff with language identification cards to assist in identifying the language interpretation services needed if the occasion arises.
- Periodically survey **COUNTY OF GREENE** staff regarding their interaction with LEP persons during the previous period (e.g., quarterly, semi-annually, and annually).

- Greet participants at the **COUNTY OF GREENE** sponsored informational meeting or event. Conversational interaction with participants can help determine LEP needs for current and future events.

Language Assistance Measures

Although there is a very low percentage of LEP individuals in **COUNTY OF GREENE** service area, (i.e., persons who speak English less than “very well” or “not at all”), **COUNTY OF GREENE** will take the following actions:

1. **COUNTY OF GREENE** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
 - Volunteer Spanish language interpreters will be provided within a reasonable period.
 - Language interpretation services for all other languages will be accessed through a professional interpretation service.

STAFF TRAINING

COUNTY OF GREENE will provide staff with appropriate training that may include one or more of the following topics:

- Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- How to correctly access service provider language interpretation services
- Documentation of language assistance requests
- Handling of Title VI/LEP complaints

All contractors or subcontractors performing work for the **COUNTY OF GREENE** are required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

COUNTY OF GREENE weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of document translations, the likelihood of frequent changes in documents and other relevant factors, **COUNTY OF GREENE** has determined that it is an unreasonable burden to translate documents at this time. However, **COUNTY OF GREENE** will pursue free or low-cost alternatives to address LEP needs.

Due to the very small LEP population, **COUNTY OF GREENE** does not have a formal outreach procedure in place as of 2024. Translation resources have been identified and are limited in this region. However, if the need arises to conduct outreach to LEP individuals, **COUNTY OF GREENE** will, in addition to the above, examine the following options:

- When staff prepares documents or schedules public meeting whose audience is expected to include LEP individuals, **COUNTY OF GREENE** will provide meeting notices, flyers, and agendas in the appropriate non-English language(s).
- **COUNTY OF GREENE** will assess requests for the translation of documents based on the potential effect to the LEP population.

MONITORING

Monitoring and Updating the LEP Plan – **COUNTY OF GREENE** will update the LEP Plan as required. The Plan will be revised when recent data from the U.S. Census and the American Community Survey is available, or when it is clear that higher concentrations of LEP individuals are present in **COUNTY OF GREENE** service area. Updates to the LEP Plan will include the following:

- The number of documented LEP contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area (census data, surveys, information from community-based organizations, and other sources)
- Determination as to whether the need for translation/interpretation services has changed
- Determination of the effectiveness of language assistance efforts
- Determination of the adequacy of **COUNTY OF GREENE** financial resources to fund language assistance resources
- Determination of **COUNTY OF GREENE** compliance with the LEP Plan
- Determination of **COUNTY OF GREENE** processing of LEP complaints

DISSEMINATION OF COUNTY OF GREENE LEP PLAN

Choose one or more actions that **COUNTY OF GREENE** will take:

- Post signs in **COUNTY OF GREENE** public areas informing LEP persons of the LEP Plan and how to access language services.
- Notify LEP persons of the availability, upon request, of documents in other languages. Notifications should be placed on agendas and public notices and in the language that LEP persons can understand.
- Post the LEP Plan and the procedures to access language services on **COUNTY OF GREENE** website.
- Prepare and post press release in non-English languages as necessary.
- Distribute copies of press releases to advocacy groups and other organizations serving LEP populations.