



City of Mountain View

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Pre-2019 Limited English Proficiency (LEP) Plan

Table of Contents

Introduction.....	2
Definition	3
Plan Summary.....	3
Four Factor Analysis	4
Measures for Assisting LEP Persons	8
Determining LEP Persons	8
Monitoring and Updating the LEP Plan.....	9
Complaints	9
City Contact.....	10

Introduction

This plan Limited English Proficiency Plan serves to meet the legal obligation of language access requirements in Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. (National Origin Discrimination Against Persons With Limited English Proficiency) and 65 Federal Regulations 52762 (2000) founded in Executive Order (EO) 13166.

Title VI and its implementing regulations prohibit discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. Because different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination, persons who have limited English proficiency are considered a federally-protected class. EO 13166 directs each agency that is subject to the Title VI requirements to publish guidelines for improving access to services for persons with limited English proficiency. EO 13166 states that the guidance documents be consistent with the enforcement provisions of Title VI of the Civil Rights Act of 1964. EO 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including local municipalities, such as the City of Mountain View and private and non-profit entities.

The City of Mountain View receives federal Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds. The City distributes these funds to sub-recipients or directly uses the funds for community programs and capital and infrastructure projects that benefit low-income areas and households and affordable housing projects. The City and its sub-recipients would be subject to Title VI regulations and Executive Order 13166 mandates, and prepared this document in compliance with title VI and EO 13166.

This information is available in other forms to people with disabilities by contacting City of Mountain View staff at 650-903-6379 (Voice) or through the California Relay Service at 911 or 1-800-627-3529 or an email to regina.adams@mountainview.gov.

Definition

Limited English Proficiency (LEP) – The description of persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Plan Summary

The Community Development Department – Neighborhood Preservation Division (NPD) has developed this Limited English Proficiency (LEP) Plan to help identify reasonable measures to provide language assistance for LEP persons seeking meaningful access to services and programs funded with Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds as required by Executive Order 13166.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, how to notify LEP persons that assistance is available, and monitoring guidance.

The U.S. Department of Housing and Urban Development's (HUD's) four factor analysis was used in developing the Plan. The following information was assessed:

- 1) The number or proportion of LEP persons eligible within the City of Mountain View based on 2008 Census Data.
- 2) The frequency with which LEP individuals are likely to come in contact with Department staff in connection with CDBG or HOME funded programs or activities.
- 3) The nature and importance of the CDBG or HOME program or activity provided by the City for the LEP population.
- 4) The resources available to the City and the overall costs to provide LEP assistance.

Four Factor Analyses

1. The number or proportion of LEP persons eligible within the City who maybe served or likely to encounter a federally funded activity or service.

Based on US Census 2000 and American 2008 Community Survey data, approximately 39.9% of total 72,452 persons in Mountain View (31,061) spoke a language other than English in the home. These statistics are available on a citywide basis only; no statistics for smaller areas, such as a census block group, are available. The Census Bureau has a range of four classifications of how well people speak English. The classifications are “very well”, “well”, “not well”, and “not at all”. For our planning purposes, we are considering people that speak English “not well” or “not at all” as Limited English Proficient persons. Of the 72,452 total, 16,489 persons noted they spoke English less than very well. The breakdown is as follows:

Ethnicity where English is spoken less than “Very Well”	Estimate	Percent
Spanish	8,003	49.0%
Other Indo-European Language	2,388	14%
Asian and Pacific Islander Languages	5,614	34%
Other Languages	484	3%
Total	16,489	100%

The statistics also showed that 72% of the population five and older in Mountain View speaks English only; of the total population, 5.6% indicate that they speak English “not well” or “not at all”. The three primary LEP languages spoken other than English are Spanish, Mandarin, and Russian, with Spanish being the most and Russian being the least prominent of the three.

A linguistically isolated household is defined by the Census Bureau as one in which all members 14 years old and over have at least some difficulty with English. The 2008 American Community Survey identified 625 linguistically isolated households in Mountain View comprised of 1,163 individuals which is 4.3% of the total (27,179) of all individuals in households 5 years and older.

Persons in households, including linguistically isolated households who speak English “not well” or “not at all”, are considered LEP persons. This is the population that is most likely to require assistance accessing programs and services.

2. The frequency with which LEP individuals come in contact with a CDBG or HOME program or activity.

The NPD assessed the frequency at which staff interacts with LEP persons in association with a CDBG or HOME program activity. The assessment included a review of Mountain View beneficiaries of CDBG-funded public services during a one-year period.

Annually, the City funds between eleven and fifteen CDBG and HOME funded activities where staff of funded agencies or City staff might encounter LEP persons. Typically, the CDBG and HOME-funded agencies collectively serve between 4,000 and 5,500 persons per year. There may be clients who obtain services from more than one agency, but for purposes of the Plan, it is assumed that the clients are unduplicated among agencies. In addition to the actual number of clients served there are inquiries regarding the CDBG/HOME programs generated by interest and outreach. About 15 inquiries per month are received by City staff on the CDBG/HOME programs, with the exception of the annual CDBG/HOME application period when inquiries double.

Outreach is performed on a citywide basis to inform residents about the services and programs, which are targeted to lower income households. Outreach by the agencies is performed on an ongoing basis. The City performs outreach during the funding cycle and Consolidated Plan Annual Performance and Evaluation and Report (CAPER) and to promote housing opportunities, fair housing activities and events related to certain CDBG/HOME activities. Language assistance requests would typically be referred to and handled by the Outreach Program, which annually receives about 30 requests for translation services.

There is no large geographic concentration of any one type of LEP individuals within the City, so their location within the City would not affect their frequency of contact with CDBG and HOME programs or activities.

Although some CDBG/HOME-related City contact with LEP persons may take place at non-City locations, the majority of contact with LEP persons is likely to occur at one of the three public locations below:

City of Mountain View Access Locations

City Hall

Community Development Public Counter (1st Floor)
500 Castro Street
Mountain View, CA 94041
Phone: 650-903-6379

Community Center

201 South Rengstorff Avenue
Mountain View, CA 94040
Phone: (650) 903-6331

Library

585 Franklin Street
Mountain View, CA 94041
Phone: 650-903-6887

3. The nature and importance of the program, activity, or service provided by the City to the LEP community.

The City's Consolidated Plan goals and actions (objectives) are to utilize CDBG and HOME funds for the creation of affordable housing, to foster neighborhood stability, for physical improvements and housing rehabilitation, and to promote fair housing choice. The emphasis is specifically on creating and preserving housing opportunities and to provide services for lower income households, the homeless and special needs groups such as the disabled and at-risk youth. To that end, LEP measures would also be targeted to community input and neighborhood meetings, hearings and events associated with those types of CDBG and HOME funded activities. The level of LEP assistance made available will depend on the number of LEP persons anticipated to attend.

4. The resources available to the City and overall costs

The City has an Outreach Program that was established specifically to outreach to LEP and other populations that may need assistance in accessing City services. The Program is comprised of staff and volunteers who go out into the community to inform non-English speaking residents and inform resident on available services. Outreach Workers are fluent in Spanish, Mandarin and Russian, the three primarily non-English languages in Mountain View, but, if a person requires translation into other services, the Outreach Division can coordinate those requests. The Outreach Program is responsible for maintaining a list of neighborhood, business and other outreach contacts for the City's racial and ethnic minorities. Program staff translates and distributes City announcements and flyers for services and events into the three primary LEP languages: Spanish, Mandarin, and Russian. Program staff also maintains a base of volunteers that can assist with translations at City-sponsored meeting and events. The City also has a diverse staff pool that consists of bilingual employees who speak Spanish, Mandarin, and Tagalong and who could help assist persons who need verbal translation assistance and referrals.

The federal LEP Guidance states "A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller, sub-recipient agencies with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits." While the City has an Outreach Division and bilingual employees, many of the agencies that receive CDBG and HOME funds do not have the capacity to staff an Outreach Division or equivalent resource. In these cases, there would still be a need to provide access to translation services or referrals to another agency that can facilitate access to the desired language.

Measures for Assisting LEP Persons

With regard to the four factors, the measures below are in effect to assist LEP in accessing CDBG and HOME programs and activities:

- The Outreach Workers from the Community Outreach Program will provide non-English speaking residents with information about programs, meetings and other community events/activities; assistance in completing applications for subsidized housing and community programs; provide translation services in the community as needed; and make presentations and distribute brochures on City services to churches, apartment complexes and other locations where non-English speaking persons can be found.
- Translation services will be available at Council hearings and Commission meetings where non-English speaking persons were expected to attend.
- CDBG/HOME announcements on the funding cycle and CAPER availability will be provided in English and Spanish. CDBG/HOME announcements for the Consolidated Plan updates and subsidized housing opportunities will be translated into Spanish, Mandarin and Russian, since the associated meetings and hearings involve receiving a wider range of community input.
- Subrecipients of CDBG and HOME funds are required to implement LEP measures for the clients they serve as a consideration and condition of funding. City staff, as necessary, will refer LEP persons to CDBG or HOME funded agencies, their LEP measures will be referenced to assist with the referral.

Determining LEP Persons

City and agency personnel administering CDBG and HOME funds are most likely to encounter LEP persons when members from the public are requesting a service or referral. If no English is spoken, then the staff persons would try to determine the language either through the initial contact or via help of other staff. City staff would contact the Outreach Program, if no staff within the Department are available for translation. In no event would an LEP person be denied information or services due to their LEP status.

For meetings, hearings, events and announcements, the CDBG/HOME LEP contact would consult with the meeting or event sponsored to determine if translation services are needed and the information regarding the CDBG or HOME funded activity that would be most pertinent to those who speak languages other than English.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. A summary of the City's language assistance actions during the program year will be included in each CDBG Consolidated Annual Performance Evaluation Report. The Plan will be reviewed periodically to make sure that it is relevant to the LEP needs in the community. At a minimum, the NPD will follow the Title VI Program update schedule for the LEP Plan. The following Plan components will be reviewed for updates:

- How many LEP persons were encountered?
 - Note translation requests via phone and public meetings/hearings
- Have there been significant changes in the number of LEP persons in the City?
 - Review Census and American Community Survey Data
- Has there been a change in the types of languages where translation services are needed?
 - Note calls and correspondence received from those with LEP persons during the Plan period
- Have the City's available resources changed?
- Were the LEP Plan measures implemented?
- Were any complaints received?

Complaints

Complaints regarding unfair treatment in accessing CDBG/HOME programs and services may be filed with the CDBG/HOME LEP contact at **650-903-6379** or with the U.S. Department of Housing and Urban Development's Fair Housing Equal Opportunity Office **800-669-9777**.

Complaints that do not involve unfair treatment may be submitted to the City at **650-903-6379** or via the following Ask Mountain View web link: <https://clients.comcate.com/newrequest.php?id=128>. The complaint will be logged into a database and sent to the appropriate person for a documented response.

City Contact

CDBG & HOME Administrator
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eFax: 650-963-3081
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