



**SANTEE
LYNCHEs**

Regional Council *of* Governments

Limited English Proficiency Plan

*Concerning the needs of individuals with
limited English language skills
in the
Santee-Lynches Region*

June 15, 2018

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Introduction

The Limited English Proficiency (LEP) Plan is a resource developed to serve as a guide for Santee-Lynches Council of Governments in addressing responsibilities as a recipient of federal financial assistance from the U.S. Department of Transportation concerning the needs of individuals with limited English language abilities. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing principles, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any DOT-assisted program or activity because of challenges communicating in English.

According to data providing by the 2012-2016 American Community Survey 5 Year Estimates, There are 209,073 people over the age of 5 in the Santee-Lynches Region. Of that number, 200,359 speak only English. 8,714, or 4.3%, speak a language other than English. Spanish is the most common language other than English spoken by individuals in the region. 2.72% of the 5 and older population speak Spanish, 0.80% speak other Indo-European languages, 0.56% speak Asian and Pacific Island languages, and 0.09% speak other languages not listed.

Basis of Authority

Discrimination against a person because of their inadequate ability to speak the English language is a form of national origin discrimination, which is prohibited by Title VI of the Civil Rights Act of 1964. Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation to ensure discrimination does not occur.

Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance).

Plan Summary

Santee-Lynches Council of Governments (Santee-Lynches) has developed a Limited English Proficiency Plan to help identify realistic steps to ensure Santee-Lynches is appropriately providing language assistance for persons seeking meaningful access to Santee-Lynches services and programs as required by Executive Order 13166.

This plan outlines procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided to those individuals, the required training for staff, and how to ensure LEP persons are aware assistance is available.

In developing the LEP plan, Santee-Lynches undertook the U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number of LEP persons in the Santee-Lynches service area who might potentially be served or encounter a Santee-Lynches service or program;
- 2) The frequency of LEP individuals in contact with Santee-Lynches services and programs;
- 3) The importance of a program, activity or service provided by Santee-Lynches to the LEP populations; and
- 4) The resources available to the Santee-Lynches and costs to provide LEP assistance.

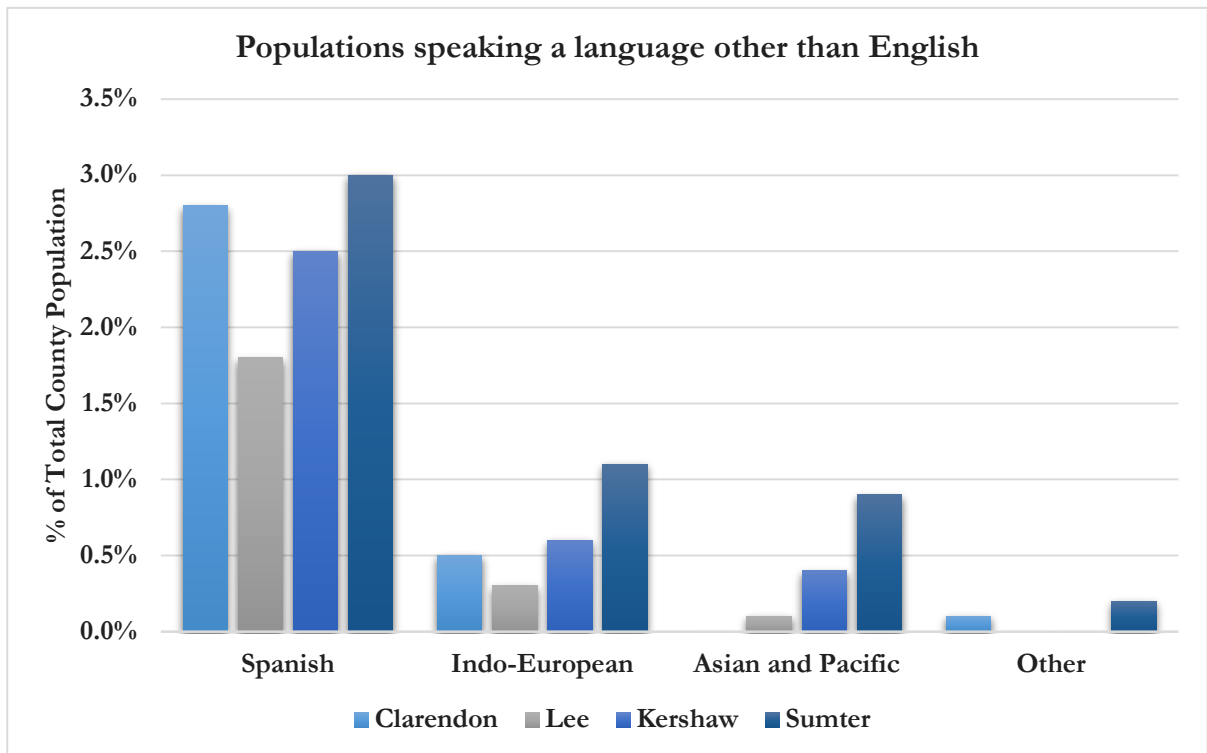
A brief description of these considerations is provided in the “Four Factor Analysis” contained in the following section.

Four Factor Analysis

1. The number of LEP persons potentially being served in the Santee-Lynches region.

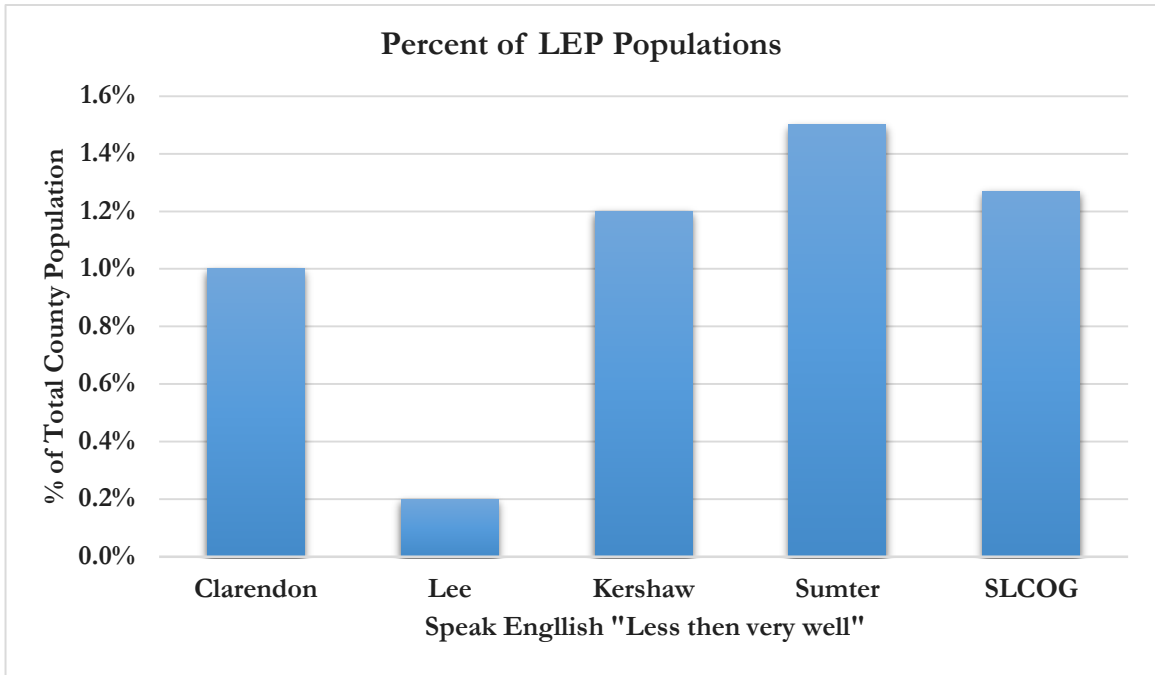
The 2012-2016 U.S. Census American Community Survey 5 Year Estimates were used in determining the LEP populations in the Santee-Lynches region. Below are the number of LEP persons in Clarendon, Kershaw, Lee, and Sumter counties who might request or use services provided by Santee-Lynches.

There are 209,073 people over the age of 5 in the Santee-Lynches Region. Of those over the age of 5, 200,359 speak only English and 8,714, or 4.3%, speak a language other than English. Spanish is the most common language other than English spoken by individuals in the region. 2.72% of the 5 and older population speak Spanish, 0.80% speak other Indo-European languages, 0.56% speak Asian and Pacific Island languages, and 0.09% speak other languages not listed.



98.73% of the population over 5 years can speak English “Very well” while the other 1.27% reported that they spoke English “Less than very well”. Individuals who have identified themselves as speaking English less than “very well” are considered to be limited English proficient based on their limited

ability to read, write, speak or understand English. Of this number, Spanish-speaking individuals accounted for over 65%, 1,739 people. Asian and Pacific languages accounted for 20.65%, other Indo-European languages accounted for 11.70%, and other languages for 2%. Based off the total county populations within the Santee-Lynches Region, Lee County has the lowest LEP population at 0.20%. Sumter County has the largest LEP population containing 1.5% of their population over the age of 5.



2. The frequency with which LEP individuals come in contact with a Santee-Lynches program, activity or service.

Santee-Lynches has assessed the frequency in which staff has, or could have, contact with LEP persons. There has been little to no contact with LEP individuals requesting language assistance from Santee-Lynches. Currently Santee-Lynches has access to one bi-lingual employee through its SC Works Center who is capable of accepting “Spanish-English translation” requests. This employee is available during regular business hours to LEP persons.

At present, Santee-Lynches has no documented evidence or history of any request for assistance related to the application/interview process. No determination can be made as to why this is the case; however, additional efforts will be made to ensure that customers are aware that language services can be made available.

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

The Santee-Lynches scope of programs include a diverse array of services requested by their local governments including: grant development and implementation; local and regional planning; economic development assistance; workforce training and development; various forms of assistance for the aging; affordable housing development; community development; environmental programs; transportation planning and project identification; and inter-governmental management assistance.

Santee-Lynches will continue to monitor and communicate with organizations across Clarendon, Lee, Kershaw, and Sumter Counties who serve LEP populations to best serve the LEP populations within the Santee-Lynches region.

4. Available resources and overall costs to Santee-Lynches.

The primary resource for LEP assistance is a bi-lingual (Spanish) employee at the SC Works Center, which is overseen by Santee-Lynches. This employee is available during regular business hours and is capable of handling requests for “Spanish-English” translation assistance. At present, cost has not been a deterrent or imposition to the agency’s ability to provide LEP services to customers. Community resources are available to provide interpretation and translation services at little or no cost to the Santee-Lynches through local Colleges and Universities and online translation programs.

Language Assistance Measures

A. Identifying LEP Individuals Who Need Language Assistance:

Staff at Santee-Lynches offices will use language identification cards when first encountering an LEP individual. These cards, developed by the U.S. Census Bureau, have the phrase “Mark this box if you read or speak [name of language]” translated into 38 different languages. It was developed by the Census Bureau and is used by government and non-government agencies to identify the primary language of LEP individuals during face to face contacts.

Santee-Lynches will monitor the language needs of LEP individuals within the Santee-Lynches region by conducting the following actions:

- Monitor languages and English proficiency levels encountered by staff.
- For languages other than Spanish, staff will attempt to identify the LEP person’s preferred language using the “I Speak” Identification cards. (Appendix A)
- Continue to use the most recent available data from the U.S. Census, state, and local demographic data

B. Type of Language Services Available

The type of language services available by the department include:

- Bilingual staff
- Translation services under contract with professional translators/ interpreters, as needed
- Staff will attempt to identify the LEP person’s preferred by using the U.S. Census “*I Speak*” Identification cards to identify languages. (Appendix A)

C. Santee-Lynches Staff Engagement with LEP Individuals

The Title VI Officer for the Santee-Lynches will be informed of all requests for language services by an LEP individual to ensure proper documentation and procedures are followed. The Title VI Officer will obtain the date and time of engagement, name of individual requesting assistance, language (if it can be determined), nature of inquiry and disposition.

D. Santee-Lynches Staff Training and Awareness

Santee-Lynches will take steps to insure staff has appropriate training and resources available to assist LEP individuals.

These steps include:

- Provide staff with information on the Title VI Policy and LEP responsibilities
- Provide staff with information on language assistance services available
- Provide staff with information on use of “I speak” cards
- Train staff on how to document language assistance requests
- Train staff on how to handle potential Title VI complaints
- Inform staff of the designation of the organization’s Title VI Officer
- Inform staff of the identity of bilingual staff capable of providing interpretation support and in what languages

Contractors/Consultants:

All contractors or subcontractors performing work for Santee-Lynches will be required to follow Title VI/LEP guidelines.

E. Monitoring and Updating the LEP Plan

This plan is designed to be easily updated upon major changes in the concentration of LEP individuals in the Santee-Lynches region based on updated Census data. Major changes will likely not occur until after the next decennial Census in 2020.

Santee-Lynches will monitor language data for the region and evaluate major changes in the number of LEP individuals using 5-year ACS estimate data. Santee-Lynches will also monitor the frequency of departmental encounters with LEP Individuals. If significant changes are noted in the concentrations of LEP individuals, or if there is a major increase in encounters with LEP individuals, an update to the LEP Plan will be considered.

Updates will consider the following data:

- Number of documented LEP persons encountered annually;
- How needs of LEP persons have been addressed;
- Current LEP population within the Santee-Lynches region;
- Change in need for translation services;
- Evaluation of whether local language assistance programs have been effective and sufficient to meet the need;
- Determination as to whether existing financial resources are sufficient to fund language assistance when needed;

- Determination as to whether Santee-Lynches fully complies with the goals of the LEP Plan;

F. Where to find the Santee-Lynches Limited English Proficiency Plan

The Santee-Lynches LEP Plan is available on the Santee-Lynches website at www.santeelynychescog.org/transportation. Any person or agency may access and download the LEP Plan from the website. Copies of the LEP Plan will be provided upon request. LEP individuals may request copies of the Plan in translation which Santee-Lynches will provide, if feasible. Any questions or comments regarding this plan should be directed to the Santee-Lynches Title VI Officer.

Appendix A – I Speak Cards

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ອ່ອງນີ້ ຖ້າທ່ານອ່ານຊື່ປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้ทำเครื่องหมายลงในช่องดำผ่านด่านหรือศุลกากรไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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Appendix B – ACS 2016 Tables

Table 1-1: English Spoken in Populations over age 5 – South Carolina

South Carolina

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	4,543,106	-	4,417,372	97.20%	125,734	2.80%
<i>Speak only English</i>	4,230,746	93.10%	-			
<i>Speak a language other than English</i>	312,360	6.90%	186,626	59.70%	125,734	40.30%

Table 1-2: Languages Spoken other than English – South Carolina

South Carolina

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Total Population 5 Years and Over</i>	4,543,106	-	4,417,372	97.20%	125,734	2.80%
<i>Spanish</i>	200,761	4.40%	111,436	55.50%	89,325	44.50%
<i>Other Indo-European languages</i>	58,669	1.30%	43,957	74.90%	14,712	25.10%
<i>Asian and Pacific Island languages</i>	41,081	0.90%	22,628	55.10%	18,453	44.90%
<i>Other languages</i>	11,849	0.30%	8,605	72.60%	3,244	27.40%

Table 2-1: English Spoken in Populations over 5 – Santee-Lynches Region

Santee-Lynches Region

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	209,073	-	206,424	98.73%	2649	1.27%
<i>Speak only English</i>	200,359	95.8%	-			
<i>Speak a language other than English</i>	8,714	4.3%	6,065	69.60%	2649	30.40%

Table 2-2: Languages Spoken other than English – Santee-Lynches Region

Santee-Lynches Region

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Total Population 5 Years and Over</i>	209,073	-	206,424	98.73%	2649	1.27%
<i>Spanish</i>	5,688	2.72%	3,949	69.43%	1739	30.57%
<i>Other Indo-European languages</i>	1,668	0.80%	1,358	81.41%	310	18.59%
<i>Asian and Pacific Island languages</i>	1168	0.56%	621	53.17%	547	46.83%
<i>Other languages</i>	190	0.09%	137	72.11%	53	27.89%

Table 3-1: English Spoken in Populations over 5 – Clarendon County

Clarendon County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	32,349	-	32,020	99.0%	329	1.00%
<i>Speak only English</i>	31,239	96.6%	-	-	-	-
<i>Speak a language other than English</i>	1,110	3.4%	781	70.4%	329	29.6%

Table 3-2: Languages Spoken other than English – Clarendon County

Clarendon County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Spanish</i>	906	2.80%	617	68.10%	289	31.90%
<i>Other Indo-European languages</i>	172	0.50%	141	82.00%	31	18.00%
<i>Asian and Pacific Island languages</i>	12	0.00%	3	25.00%	9	75.00%
<i>Other languages</i>	20	0.10%	20	100.00%	0	0.00%

Table 4-1: English Spoken in Populations over 5 – Lee County

Lee County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	17,155	-	17,119	99.8%	36	0.20%
<i>Speak only English</i>	16,796	97.9%	-	-	-	-
<i>Speak a language other than English</i>	359	2.1%	323	90.0%	36	10.0%

Table 4-2: Languages Spoken other than English – Lee County

Lee County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Spanish</i>	301	1.80%	279	92.70%	22	7.30%
<i>Other Indo-European languages</i>	44	0.30%	30	68.20%	14	31.80%
<i>Asian and Pacific Island languages</i>	14	0.10%	14	100.00%	0	0.00%
<i>Other languages</i>	0	0.00%	0	-	0	-

Table 5-1: English Spoken in Populations over 5 – Kershaw County

Kershaw County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	59,371	-	58,632	98.8%	739	1.20%
<i>Speak only English</i>	57,281	96.5%	-	-	-	-
<i>Speak a language other than English</i>	2,090	3.5%	1351	64.6%	739	35.4%

Table 5-2: Languages Spoken other than English – Kershaw County

Kershaw County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Spanish</i>	1,464	2.50%	906	61.90%	558	38.10%
<i>Other Indo-European languages</i>	385	0.60%	276	71.70%	109	28.30%
<i>Asian and Pacific Island languages</i>	241	0.40%	169	70.10%	72	29.90%
<i>Other languages</i>	0	-	0	-	0	-

Table 6-1: English Spoken in Populations over 5 – Sumter County

Sumter County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Population 5 years and over</i>	100,198	-	98,653	98.5%	1545	1.50%
<i>Speak only English</i>	95,043	94.9%	-	-	-	-
<i>Speak a language other than English</i>	5,155	5.1%	3610	70.0%	1545	30.0%

Table 6-2: Languages Spoken other than English – Sumter County

Sumter County

	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	#	%	#	%	#	%
<i>Spanish</i>	3,017	3.00%	2,147	71.20%	870	28.80%
<i>Other Indo-European languages</i>	1,067	1.10%	911	85.40%	156	14.60%
<i>Asian and Pacific Island languages</i>	901	0.90%	435	48.30%	466	51.70%
<i>Other languages</i>	170	0.20%	117	68.80%	53	31.20%