**[DRAFT 5/13/24] Appendix E**

**Title VI Language Access Plan**

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”, the Mount Ascutney Regional Commission (MARC) has established the following Language Access Plan to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our agencies. An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.”

The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across beneficiaries. To prepare for the development of this plan, we conducted a Four-Factor Analysis which balanced

the following factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which the LEP people come into contact with the agency.
3. The nature and importance of the program, activity, or service provided by the agency.
4. The resources available and costs to the recipient.

**Persons Charged with Implementing the Plan**

The Title VI Coordinator will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, the Title VI Coordinator will be charged with maintaining and updating this plan as the need for changes arises. The Title VI Coordinator will report to the Executive Director and will need to coordinate with other appropriate staff in order to carry out the directives established by this plan.

**Four Factor Analysis**

The USDOT guidance outlines four factors that recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to the MARC and overall cost.

**Factor 1: The proportion and number of LEP persons in the MARC region is very small.** The 2018-2022 American Community Survey estimates that the percentage of households with limited English is 1.8%. The most prevalent languages spoken are Spanish (5% of households in the MARC region) and “Other Indo-European” (1.4%). See Table 4 from the full Title VI Plan below:

**Table 4: Limited-English Households in the Mount Ascutney Region**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Only English | Spanish | Limited-English Spanish | Other Indo-European | Limited-English Indo-European | Asian/ Pacific Island | Limited-English Asian/ Pacific Island | Other  | Limited-English Other | All Limited-English % of Total |
| Andover | 589 | 9 | 9 | 2 | 2 | 0 | 0 | 0 | 0 | 1.8% |
| Baltimore | 334 | 0 | 0 | 3 | 2 | 0 | 0 | 0 | 0 | 0.6% |
| Cavendish | 1,190 | 65 | 15 | 37 | 29 | 0 | 0 | 0 | 0 | 3.4% |
| Chester | 2,804 | 12 | 12 | 86 | 48 | 0 | 0 | 0 | 0 | 2.1% |
| Ludlow | 1,892 | 0 | 0 | 30 | 28 | 0 | 0 | 4 | 4 | 1.7% |
| Reading | 591 | 0 | 0 | 24 | 15 | 0 | 0 | 0 | 0 | 2.4% |
| Springfield | 8,618 | 82 | 27 | 95 | 76 | 49 | 8 | 22 | 22 | 1.5% |
| Weathersfield | 2,721 | 28 | 24 | 10 | 10 | 0 | 0 | 0 | 0 | 1.2% |
| West Windsor | 991 | 0 | 0 | 23 | 17 | 0 | 0 | 0 | 0 | 1.7% |
| Windsor | 3,245 | 78 | 33 | 46 | 43 | 6 | 9 | 0 | 0 | 2.5% |
| MARC region | 22,975 | 274 | 120 | 356 | 270 | 55 | 17 | 26 | 26 | 1.8% |
| Vermont | 582,351 | 7,144 | 4,163 | 18,563 | 11,667 | 5,095 | 2,489 | 2,388 | 1245 | 3.2% |

*Source: ACS 2022 5-Year Estimates*

**Factor 2: The frequency of contact between Limited English-Speaking persons about planning services provided by MARC is rare.** Contact between MARC staff and limited English-speaking persons is exceedingly rare. Over the past decades, staff have not come into contact with LEP persons, nor has MARC received any requests for translation services.

**Factor 3: The nature of planning services provided to member communities by the MARC are not life threatening** which would allow a reasonable amount of time for translation services to be provided.

**Factor 4: Resources are available.** Translation and interpretation services are available, when needed. LEP needs can be accommodated by including a tagline on public notices, hosting a webpage with the Title VI Coordinator’s contact information, highlighting this service at public meetings/presentations, and providing a list of providers available. The MARC website is also available in multiple languages.

**Language Assistance Policy**

It is the policy of the Mount Ascutney Regional Commission (MARC) to take reasonable steps to provide meaningful access to LEP individuals accessing services provided by MARC. The policy is to ensure that language will not prevent staff from communicating effectively with LEP persons and that limited English proficiency will not prevent people from accessing services provided by MARC.

LEP individuals may interact with MARC staff in a number of ways, including but not limited to:

* Participation in programs and services
* Outreach programs
* Public meetings and hearings
* Public access to organization website
* Written materials or complaints
* MARC flyers, brochures, etc.

The MARC will provide oral and written translation, written interpretation and translation, and sign language, as requested. Staff will direct any requests to the Title VI Coordinator.

The public will be notified of the availability of language assistance services through a tagline on public notices, physical postings at the MARC office, and a notice on the MARC website.

These services can also be requested by contacting MARC at (802)-674-9201 or email lnicoll@marcvt.org or visit the administrative office at 38 Ascutney Park Road, Ascutney, VT from 8:30am – 4:30pm Monday through Friday.

As of April 2024, the MARC has not received any request to translate any document or report, or to provide interpretation services at its meetings, public hearings, or any other programs. **Considering that requests for language assistance have never occurred, a case-by- case approach shall be used to determine the most appropriate method for communicating with the LEP person.**

**Services**

A variety of language assistance services are available, if and when needed. The MARC can take advantage of the following additional resources to provide assistance to LEP members:

1. **Vancro** offers American Sign Language and Tactile American Sign Language for in-person meetings scheduled in advance.
2. **Association of Africans Living in Vermont (AALV) Interpreter Services** offers interpretation for in-person meetings scheduled in advance, as well as phone, video and written translation services
3. **Vermont Interpreter Referral Service** (VIRS) is a non-profit organization that provides statewide sign language interpreter referral services.
4. **Propio Language Services** offers interpretation for 350+ languages including ASL on demand via app, phone, and video. Written translation services are also available.

Additional language assistance services are available online at: <https://bgs.vermont.gov/purchasing-contracting/contract-info/current#Translation%20Services>

Further recommendations for making all state services accessible for LEP were published by the State Office of Racial Equity in their [2023 Language Access Report](https://racialequity.vermont.gov/sites/reap/files/doc_library/Office%20of%20Racial%20Equity%20Language%20Access%20Report%202023_0.pdf).

**Training Staff on LEP Plan**

MARC has no bilingual staff members as of 2024. All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of New Employee orientation and refresher training will be provided periodically at staff meetings. The Title VI Coordinator will be responsible for maintaining a log of the training with corresponding attendance rosters. After completion of the training, staff should understand:

* Their obligation to provide meaningful access to information and services to LEP individuals
* The protocol for handling various encounters with LEP individuals, as established by this plan
* How to access translated materials and interpretation services for provision to LEP individuals

**Monitoring, Evaluating, and Updating this Plan**

As part of their responsibilities, the Title VI Coordinator will monitor and evaluate the effectiveness of this plan annually and make updates accordingly. To do this, they will make use of the following mechanisms:

* Survey staff on how often language assistance services are used and how they could be improved
* Provide customer satisfaction surveys for any individuals engaging in LEP interpretation services
* Keep current on community demographics by engaging with local resources
* Maintain a record of interpretation service requests
* Maintain a record of available services for LEP individuals and the frequency of their use
* Maintain a record of funds and staff time spent on language assistance services

*For more information on Limited English Proficiency, Civil Rights and the Federal law, please visit* [*http://www.lep.gov/*](http://www.lep.gov/)*.*