I. BACKGROUND
The limited English Proficiency Plan addresses Title VI of the Civil Rights Acts of 1964, which prohibits discrimination based on race, color or national origin. In 1974, the U. S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI (Federal Aid Recipient Programs & Activities) regulations. Additionally, requirements are outlined in Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency signed on August 11, 2000. Its purpose is to ensure accessibility to programs and services to eligible persons who have limited proficiency in the English language.

Who is a Limited English Proficient Person?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or “LEP.” The U.S. Census Bureau does not define limited English proficiency or non-limited English proficient populations. The Census’ American Community Survey (ACCS) data is reported based on categories of English-speaking ability: very well, and less than very well.

Determining the Need of Limited English Proficiency

As a recipient of federal funds, Suwannee County must take reasonable steps to ensure meaningful access to the information and services it provides. There are four factors to consider when determining “reasonable steps.” This is known as “the four-factor analysis” and is outlined below:

• Factor 1: The number of proportion of LEP persons eligible to be served or likely to be encountered by Suwannee County’s programs, services or activities.

• Factor 2: The frequency with which LEP individuals come in contact with these programs, services or activities.

• Factor 3: The nature and importance or the program, service, or activity to people’s lives.

• Factor 4: The resources available and the overall cost to the County.

The Department of Transportation (DOT) policy guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. Below is a self-assessment of need in Suwannee County in relation to the four-factors.
II. LIMITED ENGLISH PROFICIENCY SELF ASSESSMENT FOR SUWANNEE COUNTY

Suwannee County has assessed its programs and services using the following four (4) factor analysis.

**Factor 1: the number or proportion of LEP persons eligible to be served or likely to be encountered by Suwannee County's programs, services or activities.**

Suwannee County conducts regular Board meetings and advisory committee meetings throughout the year. Additionally there will be public hearings and outreach programs conducted. Although the County Board meetings and advisory committee meetings are open to the public, the primary source of contact with citizens is through the webpage and through community outreach and education events. Therefore, it stands to reason that the most likely encounter avenue with LEP individuals would be through education and outreach events in the community, and on the Suwannee County webpage.

Data from Census Table S1601: Language Spoken at Home By Ability to Speak English for the Populations 5 Years and Over, from the U.S. Census Bureau 2009-2016 American Community Survey 5-Year Estimates, was gathered. It should be noted that for our planning purposes, people that speak English “less than very well” are included in the analysis. Further, only the top four language groups are examined.

The table below is derived from the U.S. Census Bureau’s 2009-2016 American Community Survey. It shows the number and percent of LEP persons 5 years and over, in total and by language in Suwannee County. (LEP Person: Person that speaks English “less than very well”.)

**Table 1: The Top Four Languages Spoken at Home in Suwannee County by LEP Persons**  
(US Census Bureau’s 2009-2016 American Community Survey)

<table>
<thead>
<tr>
<th>Population 5 years and older</th>
<th>Number of LEP Persons</th>
<th>Percentage of LEP Persons</th>
<th>LEP Persons who speak Spanish</th>
<th>LEP Persons who speak other Indo-European</th>
<th>LEP Persons who speak Asian/Pacific</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>41,220</td>
<td>9.2%</td>
<td>3,043</td>
<td>423</td>
<td>222</td>
</tr>
</tbody>
</table>

**Results from Factor 1 Analysis:** Although the percentage of LEP persons in Suwannee County is not significant enough to trigger a responsibility to provide services in languages other than English, Suwannee County is committed to the principles of Title VI.
**Factor 2: The frequency with which LEP individuals come in contact with these programs, services or activities.**

The four-factor analysis identified Spanish as the most significant language spoken by the LEP population in the area covered by Suwannee County. To date, very infrequently requests for language assistance services have been made by LEP individuals or groups with the exception of Emergency Medical Services (see below). Language assistance has been provided by in-house departmental employees. However, Suwannee County will continue to monitor the requests for language assistance.

Results from Factor 2 Analysis: Based on this information, it is likely very infrequently that Suwannee County staff will come into contact with LEP populations.

**Factor 3: The nature and importance of the program, service, or activity to people’s lives.**

The largest concentration of LEP individuals in Suwannee County is Spanish. In terms of importance, Suwannee County provides EMS ambulance services to all County residents. Suwannee County through its Emergency Medical Services could encounter LEP individuals at any time. Should EMS provide service to an LEP individual specific detailed procedures are in place that guide the support. For callers requesting emergency medical service, the Suwannee County Sheriff’s Office initially takes the calls and assists by providing Spanish-speaking personnel. In addition, for patients interacting with paramedics, Suwannee County subscribes to the Language Line® service and ESO Easy Speak® for use with non-English speaking patients. In addition, a copy of the Notice of Privacy Practices has been translated into Spanish by the International Translation Center of Florida, for non-English speakers.

Results from Factor 3 Analysis: Based on the services provided by Suwannee County, EMS ambulance service is deemed the most important. Adequate procedures are in place to ensure service to LEP individuals.

**Factor 4: The resources available and the overall cost to Suwannee County.**

Although there is a low percentage of LEP individuals in Suwannee County, that is, persons who speak English “less than very well” the County will strive to offer the following measures:

1. The Suwannee County staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

2. The following resources will be available to accommodate LEP persons:

   • Local interpreters for Spanish language will continue be provided within a reasonable time period.
• Language interpretation may also be accessed for this all other languages through a telephone interpretation service such as the Language Line® service and ESO Easy Speak®.

Results from Factor 4 Analysis: Although the percentage of LEP persons in Suwannee County is not significant enough to trigger a responsibility to provide services in languages other than English, Suwannee County is committed to the principles of Title VI and will provide, with reasonable notice, interpreter and translation services when needed upon request.