

# Limited English Proficiency Plan

## for Trumbull County CDBG Programs

Trumbull County Commissioners' Office  
Updated January 2023

### Introduction

Signed on August 11, 2000, Executive Order 13166 clarified Limited English Proficiency (LEP) requirements under Title VI. The Executive Order mandated that persons whose primary language is not English and who have a limited ability to speak, read, write, or understand English are entitled to language assistance with respect to a particular service, benefit, or encounter. All federal recipients are expected to make reasonable efforts to provide this language assistance.

### Methodology

The methodology recommended by the United States Department of Housing and Urban Development (HUD) to properly prepare a Limited English Proficiency Plan is as follows:

- 1) conduct a four factor analysis;
- 2) develop a Language Access Plan (LAP); and
- 3) provide appropriate language assistance.

Trumbull County researched and completed items one and two for the Trumbull County Community Development Block Grant (CDBG) Program.

Item three will be implemented according to the action steps described in the LAP.

### Four Factor Analysis

Recipients must first assess and evaluate four factors when determining how to best serve eligible LEP persons. These factors include the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; the frequency with which LEP individuals come in contact with the program; the nature and importance of the program, activity, or service provided by the recipient; and the resources available and costs to the recipient.

#### **Factor 1. The Proportion and Number of LEP Persons within the Eligible Area.**

The eligible area for this four factor analysis is Trumbull County as the County is a recipient of CDBG funding. The most recent data collected pertaining to language fluency is the 2021 American Community Survey 1-Year Estimates of Selected Social Characteristics in the United States. The chart herein illustrates the general population over the age of 5 who report speaking

English “less than very well”. According to this information, approximately 1.5 percent of Trumbull County residents age 5 and over struggle with the English language compared to 2.7 percent statewide.

## **Factor 2. Frequency of Contact with LEP Individuals.**

Interviews with each agency and individual who administer or intake applications for Trumbull County’s CDBG programs were conducted. The Trumbull County Planning Commission staff and Neighborhood Development Services, Inc. (administrator of the CHIP program for Niles, Girard, Hubbard, and Cortland) reported having no contact with LEP Individuals within the previous five years. The Trumbull Metropolitan Housing Authority’s non-profit corporations (designated CHDO for the HOME Program Consortium) reported a total of 14 instances in the previous five years. In only one of these instances was the LEP individual accompanied by an English speaking family member. No requests for document translation have been made to these agencies in the previous five years. Community Legal Aid (Fair Housing Consultant) reported 16 LEP contacts over the past 5 years. Community Legal Aid's LEP policy encourages their staff to use professional interpreters and discourages reliance on the use of family members and friends of the LEP individual. Community Legal Aid provides interpreters by hiring bilingual staff where possible, contracting with outside interpreter services or voluntary community interpreters, and by the use of telephone language interpreting services. Community Legal Aid's vital documents and standard forms are translated into Spanish. When other documents need translated or other languages are needed Asia, Ohio and Language Line are used.

## **Factor 3. The nature and importance of the program, activity, or service provided by the recipient.**

The CDBG Program in Trumbull County provides for several different types of programming designed to assist and improve the lives of the residents of the county as a whole; income eligible persons in particular. Programs range from funding for single family housing repair to public improvement programs on a larger scale such as a sanitary sewer extension. Typically the programs funded by CDBG require an application process and are generally not emergencies, though certain programs can fill urgent needs such as a roof repair or furnace replacement. While the CDBG program is important, delay of access to services would not be life threatening to LEP persons. Affording the recipient a reasonable amount of time to secure an interpreter or have documents translated would not render a person ineligible for a program or cause a program to be inaccessible to a person struggling with English.

## **Factor 4. Resources available to Trumbull County and overall costs.**

Although Trumbull County serves a very limited number of LEP persons, the county is committed to removing as many barriers to information access as feasible. As no requests for an interpreter have been made in the previous five years, it would be unnecessary for the county to employ an interpreter. Likewise, the lack of requests for document translation would render premature translation of documents that will likely need frequent updating superfluous as well. Rather it is most logical to compile a resource list of interpreters and document translation services and to consider how existing agencies within Trumbull County might collaborate to provide these services as needed.

## **Language Access Plan**

The following steps have been identified to reduce language barriers to LEP persons in Trumbull County.

- At all CDBG public meetings have a staff person greet and speak briefly with each attendee to informally assess the attendee's ability to speak English.
- Have available, at all public meetings, the Census Bureau's "I Speak Cards" located near the sign in sheet. Although staff would not be able to provide translation at that time, arrangements could be made for any needs of the attendee.
- Formally document any instances of LEP persons, requests, or inquiries by each agency using CDBG funds. This information could also be used as a data source to identify potential future language needs.
- Post signage at public meetings, local agencies, and local government offices noting that language translation is available if requested.
- On the Trumbull County Commissioners' web page under the heading CDBG include a note that interpreters and document translation services are available upon request.
- Identify a resource list of interpreters and document translation services.
- Collaborate with local agencies and institutions who are able to provide interpretation and translation services.
- Whenever information is made available in multiple languages (ex. Fair Housing brochures printed in Spanish by HUD) have the translations on file and on display if possible in the appropriate agencies.
- Review census data to examine any potential changes in the LEP population.
- Post the LEP plan on the Trumbull County Commissioners' website.
- Review the LAP yearly and update as needed. Updates should include interviews with CDBG administering agencies focusing on any new LEP encounters or requests for assistance, review of changes in resources lists, and review of changes in available local resources.

Subject	Ohio				Trumbull County, Ohio			
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate	Margin of Error	Percent	Percent Margin of Error
Population 5 years and over	11,111,082	+/-2,611	11,111,082	(X)	191,031	+/-216	191,031	(X)
English only	10,264,664	+/-17,024	92.4%	+/-0.2	181,241	+/-2,485	94.9%	+/-1.3
Language other than English	846,418	+/-17,148	7.6%	+/-0.2	9,790	+/-2,498	5.1%	+/-1.3
Speak English less than "very well"	296,781	+/-13,592	2.7%	+/-0.1	2,901	+/-975	1.5%	+/-0.5
Spanish	258,519	+/-9,229	2.3%	+/-0.1	N	N	N	N
Speak English less than "very well"	92,777	+/-5,642	0.8%	+/-0.1	N	N	N	N
Other Indo-European languages	316,329	+/-14,358	2.8%	+/-0.1	N	N	N	N
Speak English less than "very well"	103,727	+/-8,913	0.9%	+/-0.1	N	N	N	N
Asian and Pacific Islander languages	138,599	+/-9,001	1.2%	+/-0.1	N	N	N	N
Speak English less than "very well"	56,643	+/-4,993	0.50%	+/-0.1	N	N	N	N
Other languages	132,971	+/-11,150	1.2%	+/-0.1	N	N	N	N
Speak English less than "very well"	43,634	+/-5,380	0.4%	+/-0.1	N	N	N	N

SOURCE:

SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES [more information](#)

2021: American Community Survey 1-Year Estimates

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Contact Name	Name Of Provider	Types Of Services Provided	Address	Phone #	E-mail
Lindsey Gartland-Ailstock	Trumbull Metropolitan Housing Authority	Language Interpretation	4076 Youngstown Road, S.E., Warren, OH 44484	Phone: 330-369-7325/Fax: 330-369-6731	<a href="mailto:lgartland@trumbullmha.org">lgartland@trumbullmha.org</a>
Kim Barrell	Trumbull County OhioMeansJobs	Visual & Hearing Impaired /Equipment	280 N Park Ave #1, Warren, OH 44481	(330) 675-2213	<a href="mailto:kimberly.barrell-hecker@jfs.ohio.gov">kimberly.barrell-hecker@jfs.ohio.gov</a>
Shelly Blosser	Trumbull County Department of Jobs & Family Services	Visual & Hearing Impaired	280 N Park Ave #1, Warren, OH 44481	330-675-2208/Fax:330-675-2202	<a href="mailto:Shelly.Blosser@jfs.ohio.gov">Shelly.Blosser@jfs.ohio.gov</a>
	Easter Seals Community Center for the Deaf	Hearing Impaired	299 Edwards, Youngstown OH 44502	330-726-8391 (video phone services available)	
Angelica Diaz	Organizacion Civica y Cultural Hispana Americana, Inc. (OCCHA)	Language Interpretation/Spanish	3660 Shirley Road, Youngstown, OH 44502	330-781-1808	
Sister Norma Raupple	Ursuline Sisters Mission-Immigrant Outreach Program	Language Interpretation/Spanish	145 N Glenellen Ave., Youngstown, OH 44509	330-744-3147 ext. 127	
	The English Center	Language Interpretation-All Languages	323 Wick Ave. Suite 5, Youngstown, OH 44503	330-743-5767	

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