

2025



Limited English Proficiency Plan



Office of Title VI and ADA (Accessibility)

Purpose

Language barriers can inhibit (or prohibit) persons with limited language knowledge from participating in and/or benefiting from the City of El Paso's (City) programs and services. The City recognizes the potential language barrier and has created and developed a Limited English Proficiency (LEP) Plan. This plan is to ensure that resources, programs and activities are available for LEP persons in accordance to Title VI of the Civil Rights Act of 1964.

Title VI states that no person shall be excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance. Title VI prohibits discrimination: whether intentional or where the unintended effect is unduly burdensome.

Title VI protects persons from the following discrimination based on:

- race, color, national origin.

The City is committed to making its services, programs, and activities available to everyone regardless of language barriers. The City has various City departments with the potential to interact or communicate with an LEP individual. The City's LEP Plan addresses how services will be provided through general guidelines.

LEP Four-Factor Analysis

The US Department of Transportation recommends four factors that should be analyzed to determine the level and extent of language assistance required to provide meaningful access to program, activities, and services within the El Paso area. The factors include:

1. The number or proportion of LEP persons served or likely to be encountered by the program;
2. The frequency of which LEP individuals come in contact with the program;
3. The nature and importance of programs and services to LEP persons; and City of El Paso Limited English Proficiency.
4. The resources available and overall costs of providing language services.

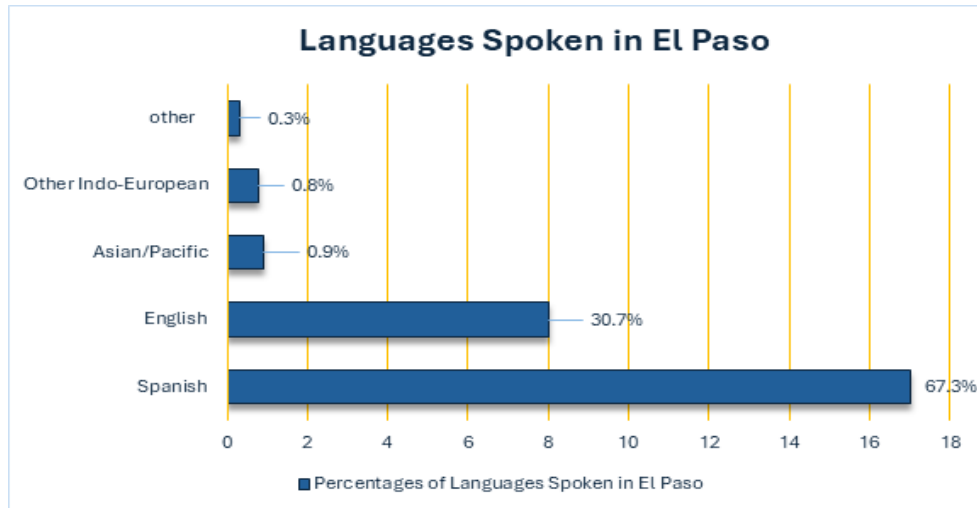
Factor 1

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 grantee. Utilizing available census data from 2018-2022, the City was able to determine that of 803,798 persons within the El Paso County area, approximately 556,832 speak a language other than English. Table 1, below shows the total percentage of people that speak languages other than English. The total percentages of languages other than English that are spoken in El Paso is 69.30 %.



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Table 1



Source: [American Community Survey and U.S Census Bureau Dec. 2023](#)

Table 2 breaks down the languages spoken at home and how many individuals speak English well in 2020.

Table 2

Most Common Languages Spoken at Home 2020

Languages	Speakers	Speak English Well	English less than well
Spanish	624,916	358,951	265,965
German	3,052	2,552	500
Arabic	1,987	1,542	445
Tagalog	1,975	1,624	351
Korean	1,661	729	932
Chinese	1,526	848	678
French	1,309	830	830
Yoruba, Twi, Igbo and other languages of Western Africa	1,254	510	744
Vietnamese	886	297	589
Ilocano, Samoan, Hawaiian or other Austronesian Languages	516	440	76
Total	639,082	368,323	271,107

Source: [2020 U.S Census Bureau](#)



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Factor 2:

The frequency with which LEP individuals come in contact with the City's programs and activities.

Understanding the frequency of interactions with LEP will assist each department to develop a plan to address the LEP needs. The City of El Paso's LEP Self-Assessment will provide a tool to identify the frequency for planning purposes. The City has developed a Self-Assessment using the four-factor concepts to analyze and be in a better position to implement a cost-effective mix of proactive language assistance measures, target resources appropriately, and to respond to requests for LEP assistance. The assessment is included as Attachment 1. Departments will be asked to complete the survey every three years. The assessment is included as Attachment 1. Departments will be asked to complete the survey Annually.

Factor 3:

The nature and importance of the programs, activities or services provided by the City of El Paso to Limited English Proficiency as needed.

To determine the nature and importance of City program, activity, or service provided to LEP persons, City departments are to identify the following:

- Programs, services, and activities that could have a serious consequence if language barriers prevent LEP persons from accessing those programs, services, or activities.
- Determine the potential impacts that inability to access City services, programs, or activities may have on the LEP person. City departments whose projects have a significant impact on LEP residents may be required by the City to develop a Language Access Plan for the program/project.

The City provides a full range of services to the general public. Each City department and programs will determine where LEP services will be needed.



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Factor 4:

Resources available to the program recipient and costs

In order to meet the City's goal to provide a cooperative project planning process, it is essential that information be disseminated in multiple formats to encourage a high level of participation. The City employs the following media strategies to disseminate information: media kits, briefings, brochures, media interviews, public service announcements, social media (Facebook, YouTube and X), City's website, and advertisements. The City's website contains timely information with upcoming meetings and posted agendas, schedules, comment boxes, maps, and surveys.

The City will translate information as needed. Meetings are open to the public and staff is always available to address diverse groups and various organizations and to field inquiries from citizens. Continued public involvement is encouraged throughout the process.

The City must consider reasonable steps to provide language services. The City will translate vital documents, or portions thereof, and those that provide access to essential services such as the "Title VI External Complaint Form" and any document required by law. The City will translate project status reports and community meeting announcements. These documents will be translated into the primary language identified for LEP persons in the region. To reduce resource and cost issues, City will use the latest technological advances in translation for its web pages. With the appropriate amount of time, the City is committed to providing oral interpretation at public meetings.

Language Assistance Services

There are two primary types of language assistance services: oral and written.

- Oral language assistance service may come in the form of "in-language" communication (a demonstrably qualified bilingual staff member communicating directly in an LEP person's language) or interpreting.
- Interpreter competency requires more than self-identification as bilingual.
- Using family members, friends, or any untrained volunteers is discouraged, while minor children should be generally prohibited. This is because it is difficult to ensure that they interpret both accurately and lack ethical conflicts.

It is the responsibility of the City to ensure that a competent interpreter has knowledge in the following:

- Knowledge of both languages and relevant terms
- Knowledge of concepts particular to the program or activity



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- Knowledge of the dialect and terminology used by the LEP individual
- Certifications for court

Translation Services

The City of El Paso's Title VI Compliance Office will work closely with city departments and offices to maintain, and update, a list of bilingual staff. This list will list languages the staff speaks and will be used to help with translations.

It will be required by the City that any materials that are provided in English will be translated as well. This includes documents, flyers, meeting notices and agendas when LEP individuals are included. Each translated document is to be printed, uploaded and shared based on the LEP population.

Vital documents or information contained within a document should be translated when a significant number or percentage of LEP population is likely to be affected by the program/activity and it contains information that is critical for obtaining services and/or benefits. Public service announcements should be available in regularly encountered languages as requested.

Employee Training

Staff will not be able to provide meaningful access to LEP individuals if they do not receive training on language access policies and procedures. This will also include how to access language assistance services.

It is required for all departments to train staff who have the potential to interact or communicate with LEP individuals. This includes staff whose job it is to arrange for language assistance services, and managers. Training topics may include the following:

- City LEP policy and procedures
- Understanding of Title VI LEP responsibilities
- What language assistance services the City of El Paso offers
- Use of LEP Interpreter Services
- Resource and referrals to access language translation services
- Documentation of language assistance requests; and
- How to handle a complaint



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Outreach

Departments must inform LEP individuals of their eligibility for benefits, programs, and services in a language they understand. They will assess different ways in which their programs have contact with the public and LEP individuals when determining the best method of providing notice of language assistance services. They will not only translate the outreach materials but also notify LEP individuals of the available language

Assistance Services

Below are tools that may be used by County departments/offices to help identify persons who may need language assistance:

- Language identification cards or Census Bureau “I speak cards” at customer service counters in City departments/offices. These cards will invite LEP persons to identify their language needs to staff. While staff may not be able to provide translation assistance at the initial contact with an LEP person, the cards are an excellent tool to identify language needs for future contacts.
- Posting notices, in commonly encountered languages, notifying LEP persons of language assistance to encourage LEP individuals to self-identify.
- Offering translation software or apps to help customer service as well as LEP individuals have ways to communicate of a translator is not available on-site.

Monitoring and Updates

The City’s LEP plan will be updated annually or as needed in response to complaints or changes in the LEP community.

Where to Find the Plan

The Plan is posted on the City website at <https://www.elpasotexas.gov/ada/title-vi>.

Copies of the Plan have been provided to the Texas Department of Transportation, the Federal Highway Administration, the Federal Aviation Administration, and the Federal Transit Administration.

Any questions or comments regarding this plan should be directed to:

Title VI Compliance Coordinator
City 3 801 Texas Ave, El Paso, Texas 79901
TitleVIOffice@elpasotexas.gov



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Attachment 1

City of El Paso

Limited English Proficiency Self-Assessment

1. Understanding How LEP Individuals Interact with Your Department

The following series of questions helps agencies understand how an LEP individual may come into contact with your department:

1. Does your department interact or communicate with the public or LEP individuals?	☐ YES	☐ NO
2. Describe the manner in which your department interacts with the public or LEP individuals:	☐ In-Person ☐ Via Correspondence ☐ Telephonically ☐ Other: Please Specify ☐ Electronically (e.g. email or website)	
3. Does your department provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other)	☐ YES	☐ NO
4. If your department does provide federal financial assistance to non-federal entities: a. Do you have an active program in place ? b. Does your department have a budget for language assistance services ? c. Does your department inform recipients about services to improve about language access	☐ YES ☐ YES ☐ YES	☐ NO ☐ NO ☐ NO



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2. Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your department identify LEP individuals? (Select all that apply)	☐ Assume limited English proficiency communication impaired ☐ Respond to individual requests for language assistance services ☐ Self-identification by the non-English speaker or LEP individual ☐ Ask open-ended questions to determine language proficiency on the telephone or in person ☐ Use of "I Speak" language identification cards or posters ☐ Based on written material submitted if to the department (i.e. complaints) ☐ We have not identified non- English speakers or LEP individuals ☐ Other (Please specify)	
2. Does your program have a process to collect data on: a. The number of LEP individuals that you serve? b. The number of LEP individuals in your service area? c. The number and prevalence of languages spoken by LEP individuals in your service area?	☐ YES ☐ YES ☐ YES	☐ NO ☐ NO ☐ NO



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3. How often does your department assess the language data for your service area?	☐ Annually ☐ Not Sure ☐ Biennially ☐ Other: _____	
4. What data does your department use to determine the LEP communities in your service area? (Select all that apply)	☐ Census ☐ U.S. Dept. of Education ☐ U.S. Dept. of Labor ☐ State Agencies ☐ Community Organizations ☐ Intake Information ☐ Other: _____	
5. Do you collect and record primary language data from individuals when they first contact your programs and activities?	☐ YES	☐ NO
6. If you collect and record primary language data, where is the information stored?		
7. What is the total number of LEP individuals who use or receive services from your program each year?		
8. How many LEP individuals attempt to access your programs or services each month?		
9. How many LEP individuals use your programs or services each month?		



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10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).	Language	Frequency of Encounters
	1.	1.
	2.	2.
	3.	3.
	4.	4.
	5.	5.
	6.	6.

3. Providing Language Assistance Services

The following set of questions will help you assess how well your department is providing language assistance services to LEP individuals:

1. Does your department currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?	☐ YES	☐ NO
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)	☐ Primary language of persons encountered/served ☐ Use of language assistance service ex. interpreters and translators ☐ Funds for staff time spent on language assistance services ☐ Number of bilingual staff ☐ Number of bilingual staff ☐ Cost of interpreter services ☐ Cost of translation of materials into non- English languages ☐ Other (Please Specify): _____	



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3. How often does your department assess the language data for your service area?		☐ YES	☐ NO
4. What types of language assistance services does your department provide? (Select all that apply)	☐ Bilingual Staff ☐ In-house translators (oral) ☐ In-house translators (documents) ☐ Contracted translator ☐ Telephone Interpretation Services ☐ Video Interpretation Services ☐ Language bank or dedicated pool of interpreters/ translators ☐ Volunteer interpreters or translator ☐ Interpreters or translators borrowed from another dept. ☐ Other: _____		
5. Does your department			
a. have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals?	☐ YES	☐ NO	
b. Does the process include use of standardized language proficiency exams?	☐ YES	☐ NO	
6. Does your department ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret?	☐ YES	☐ NO	



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7. Does your department have contracts with Language assistance service providers (in-person interpreters, telephone interpreters, video interpreters, or translators)?	☐ YES	☐ NO
8. Does your department provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?	☐ YES	☐ NO
9. Does your department identify and translate vital documents in non-English languages	☐ YES	☐ NO
10. Which vital written documents has your department translated into non-English languages?	☐ Consent forms ☐ Complaint forms ☐ Intake forms ☐ Notices of rights ☐ Notices of denial, loss/ decrease in benefits and services ☐ Notice of disciplinary action ☐ Applications to participate in programs or activities or to receive benefits or services ☐ Other (Please Specify): _____	
11. Does your department translate signs or posters announcing the availability of language assistance services?	☐ YES	☐ NO
12. When your department updates information on its website, does it also add that content in non-English languages?	☐ YES	☐ NO



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4. Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1. Does all department staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals?	☐ YES	☐ NO
2. Who receives staff training on working with LEP individuals? (Select all that apply)	☐ Management or senior staff ☐ Employees who interact with or are responsible for interactions with non- English speakers or LEP individuals ☐ Bilingual staff ☐ All employees ☐ New employees ☐ Volunteers ☐ None of the above Other: _____	
3. Are language access policies and LEP issues included in the mandatory training curriculum for staff?	☐ YES	☐ NO
4. Does your department staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals?	☐ YES	☐ NO
5. Does staff receive periodic training on how to obtain and work with language interpreters?	☐ YES	☐ NO
6. Does staff receive periodic training on how to request the translation of written documents into other languages?	☐ YES	☐ NO
7. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?	☐ YES	☐ NO
8. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?	☐ YES	☐ NO



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5. Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

2. Who receives staff training on working with LEP individuals? (Select all that apply)	☐ Frontline and outreach ☐ Posters in public areas ☐ "I Speak" language identification cards distributed to frontline staff ☐ Other (Please specify): _____ ☐ None of the above ☐ Multilingual staff ☐ Website ☐ Social media platforms i.e. Facebook, X	
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services?	☐ YES	☐ NO
3. Does your department regularly advertise on non- English media (television, radio, newspaper, and websites)?	☐ YES	☐ NO
4. Does your department inform community groups about the availability of free language assistance services for LEP individuals?	☐ YES	☐ NO
5. Does your department inform current applicants or recipients about the availability of language assistance services?	☐ YES	☐ NO
6. Does the main page of your department website include non-English information that would be easily accessible to LEP individuals?	☐ YES	☐ NO
7. Does your department have multilingual signs or posters in its offices announcing the availability of language assistance services?	☐ YES	☐ NO



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6. Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your department have a written language access policy?	☐ YES	☐ NO
2. If so, is a description of this policy available to the public?	☐ YES	☐ NO
3. How often is your department's language access policy reviewed and updated?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other: _____
4. When was the last time your department's language access policy was updated?	Month _____ Year _____	
5. How often does your department update its data on the LEP communities in your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other: _____
6. Does your department have a language access coordinator?	☐ YES	☐ NO
7. Does your department have a formal language access complaint process?	☐ YES	☐ NO
8. Has your department received any complaints because it did not provide language assistance services?	☐ YES	☐ NO
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?	☐ YES	☐ NO
10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?	☐ YES	☐ NO



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Executive Order 13166 - In 2000, President William J. Clinton signed Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.” The order provided clarification of Title VI in the Civil Rights Act of 1964, stating that recipients of federal funds must “ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin.”

On March 1, 2025, President Donald J. Trump signed an executive order to completely repeal the multilingual mandates of Executive Order 13166, declaring English as the official language of the federal government for the first time in American history. This order marks a significant shift in federal language policy, as it aims to eliminate the previous multilingual requirements.

Executive orders cannot overturn existing statutes, that would require Congress to pass a new law. Despite the new executive order and the rescission of EO 13166, language access remains the law. Both Title VI of the Civil Rights Act of 1964 and Section 1557 of the Affordable Care Act prohibit discrimination on the basis of “national origin” which the Supreme Court and HHS have interpreted as including language. Together, Title VI and Section 1557 apply to all health programs and activities funded by the federal government, operated by a federal agency, and created under Title I of the Affordable Care Act (including marketplaces and qualified health plans).