

Title VI Language Assistance Plan (LAP)

Purposes of This Plan

It is the policy of WHW, also known as Women Helping Women to employ its best efforts to ensure that all programs, services, activities and benefits are implemented without discrimination. WHW has taken a number of steps to assist LEP (limited English proficient) individuals to access our programs and services.

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

This Language Assistance Plan will guide and document WHW's interaction with LEP and other individuals and ensure WHW continues to provide meaningful access to its services and programs.

WHW has used the Four Factor Analysis, which provides a careful analysis of LEPs WHW may encounter, to determine the specific language services that are appropriate for the organization to provide. The four-factor LEP analysis includes:

- Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter a WHW program, activity or service.
- Factor 2: The frequency with which LEP persons come in contact with a WHW program, activity or service.
- Factor 3: The nature and importance of programs, activities or services provided by WHW to the LEP population.
- Factor 4: The resources available to WHW and overall cost to provide LEP assistance.

Four Factor Analysis

Factor One: The number or proportion of LEP persons eligible to be served or likely to be encountered

According to the OC Business Council’s OC Community Indicator Report, Orange County has a population of 3.2 million people in 2020. According to the U.S. Census Bureau, The total population 5 years of age and older who speak English at home is 3 million or 93.6 percent of Orange County’s total population. The percentage of the Orange County population 5 years of age and older who speak English less than “very well’ or “not at all” is approximately 690,903 persons or 21.4 percent of the population.

LANGUAGE	Total Number of Speakers	Speaks English Less Than “Very Well”	Percent of Total Population (Age 5+)	Percent of Total LEP Speakers
Spanish	749,710	367,299	26.5%	49.0%
Vietnamese (Asian/Pacific Islander)	163,207	100,797	5.8%	61.8%
Korean (Asian/Pacific Islander)	73,757	39,958	2.6%	54.2%
Chinese (Asian/Pacific Islander)	63,312	28,146	2.2%	44.5%
Tagalog (Asian Pacific Islander)	45,073	10,026	1.6%	22.2%
Persian (Indo-European)	32,639	9,457	1.2%	29.0%
Japanese (Asian/Pacific Islander)	16,564	8,431	0.6%	50.9%
Arabic (Indo-European)	14,741	5,529	0.5%	37.5%
Hindi (Indo-European)	10,713	1,555	0.4%	14.5%
French (Indo-European)	9,648	1,773	0.3%	18.4%
German (Indo-European)	7,688	1,078	0.3%	14.0%
Gujarati (Indo-European)	6,262	2,750	0.2%	43.9%
Mon-Khmer (Asian/Pacific Islander)	6,031	2,271	0.2%	37.7%
Urdu (Indo-European)	5,786	1,979	0.2%	34.2%
Russian (Indo-European)	4,673	1,534	0.2%	32.8%
Portuguese (Indo-European)	4,283	1,189	0.2%	27.8%
Thai (Asian/Pacific Islander)	2,724	1,229	0.1%	45.1%
African Languages	2,554	1,225	0.1%	47.9%
Laotian (Asian/Pacific Islander)	2,364	1,408	0.1%	59.6%

Generally, WHW will serve approximately 1300 job seekers annually with 10% of these individuals identifying themselves as Hispanic or Latino and 14% identifying themselves as multiracial.

Factor Two: The frequency with which LEP persons come into contact with the program

The top five non-English Languages spoken in Orange County are (in descending order of frequency):

- Spanish (24.8%)
- Vietnamese (6.44%)
- Korean
- Mandarin
- Arabic

Spanish is the primary language for LEP populations that are generally served by WHW, although there are occasionally a few individuals who speak Farsi. In surveying WHW staff who are responsible for answering the phone and/or receiving new WHW participants, it was determined that approximately 4% or around 50 LEP individuals annually will request information about our services or complete an intake form to participate in our services.

Staff also report that in most cases the LEP individuals who call are looking for information on a service or program, which WHW does not offer, such as financial assistance, housing, etc.

Factor Three: The nature and importance of the program, activity, or service to people's lives

Due to the nature of the employment readiness services provided by WHW, the importance of our programs and services can be critical to LEP persons who may be in need of assistance in preparing for employment.

Factor Four: The resources available to the recipient for LEP outreach that can reasonably be provided

While WHW's operating budget does not have a specific line item for providing language access and outreach, WHW has a very diverse staff, several of whom are fluent in Spanish, and who are able to meet the translation needs of our participants as needed.

In the cases where LEP individuals are looking for information on a service or program, which WHW does not offer, such as financial assistance, housing, etc., WHW staff who take the calls (who are bilingual in both English and Spanish) are able and qualified to refer callers to the appropriate agencies. A fair majority of translation occurs with family members and not always participants or potential participants exclusively.

If for some reason, bilingual staff is not available, or if the language spoken by the LEP individual is other than Spanish, "Google Translate" is used to assist with translation as necessary.

For LEP individuals who participate in WHW programs such as workshops or resume development, we assign a bilingual staff member to assist them in verbal translation of the material as needed. If translation of documents is necessary, staff will assist in that area as well.

The results of the Four Factor Analysis can be summarized with the following points:

- The likelihood of an LEP individual requesting information on WHW services or participation in WHW programs, whom the organization is not able to assist is almost null.
- No participants were underserved or exited WHW programs due to language barriers in the last two fiscal years (2018-2019 and 2019-2020).
- Surveyed reception staff reported very few LEP phone calls that were actually for our services or programs.
- WHW does not have an LEP specific budget line, but expenses related to LEP are minimal.

Language Assistance Plan Implementation

1. Callers and Visitors

Spanish speaking translators are available upon request during normal business hours. Bilingual staff members available to assist with translation as needed include:

- Operations Manager – (Spanish)
- Retail Manager – (Spanish)

Access to Google Translate is available on all office computers for use in translation as needed if bilingual staff is not available or if the non-English language spoken is other than Spanish.

2. WHW Vital Documents

FTA C4702.1B defines vital documents as, “documents that provide access to essential services.”

Title VI Documents are vital documents. The complaint form and procedures and Title VI notices will be made available in both English and Spanish, the LEP language WHW is most likely to encounter. These documents will be made available at the front desk and on WHW’s website. Should this information be requested in other languages, the documents will be orally translated as requested using Google Translate.

Participant online intake form is a vital document. Spanish speaking translators are available upon request during normal business hours to assist with the completion of this form. Should this information be requested in other languages, assistance will be provided using Google Translate.

3. Staff Training

Front desk, operations and program staff who interact with the public are trained upon hire and annually in assisting LEP individuals including identifying languages and the use of Google Translate to assist as necessary.

LEP annual training includes:

- A summary of Orange County's demographics including LEP population and frequency of contact between LEP populations and WHW
- A description of WHW's non-discrimination policies and practices
- The Title VI Complaint Form and Procedures for investigating complaints
- A summary of WHW's Language Assistance Program requirements
- Use of Google Translate

4. Monitoring, Evaluating and Updating the Language Assistance Plan

A thorough review of this Language Assistance Plan will be undertaken at the end of each fiscal year within 60 days of year end. At that time, the LEP population will be reassessed to ensure all significant LEP languages are included in WHW's language assistance efforts.

WHW will regularly assess the effectiveness of how it communicates with LEP individuals by working with staff, non-profit agency partners and participants themselves.

5. Contact Information

WHW's Language Assistance Plan will be posted on our website at whw.org. Additionally, the LAP will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the Language Assistance Plan upon request. Any questions or comments regarding this plan should be directed to:

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