

Limited English Proficiency (LEP) Plan

A. Plan

The Wyoming Valley Sanitary Authority (WVSA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines, the WVSA will make reasonable efforts to provide or arrange for free language assistance for its LEP customers and/or recipients of service.

B. Meaningful Access: Four-Factor Analysis

Meaningful access is free language assistance in accordance with federal guidelines. WVSA will periodically assess and update the following four-factor analysis, including but not limited to:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by WVSA;
2. The frequency with which LEP persons using a particular language come into contact with WVSA;
3. The nature and importance of WVSA services; and
4. WVSA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

C. Language Assistance

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to WVSA services.
2. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. WVSA will determine when interpretation and/or translation are needed and are reasonable.
3. WVSA staff will take reasonable steps to provide the opportunity for meaningful access to LEP customers who have difficulty communicating in English. If a customer asks for language assistance and WVSA determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, WVSA will make reasonable efforts to provide free language assistance. If reasonably possible, WVSA will provide the language assistance in the LEP customers preferred language. WVSA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

WVSA will periodically assess customer needs for language assistance based on requests for interpretation and/or translation, as well as the literacy skills of its customers.

D. Translation of Documents

1. WVSA will undertake this examination when an eligible LEP group constitutes 5% of the homeowners in the WVSA service area.
2. If WVSA determined that translation is necessary and appropriate, WVSA will arrange to translate the billing and selected mailings and documents of vital importance into that language.

E. Formal Interpreters

When necessary to provide meaningful access for LEP customers, WVSA will provide qualified interpreters, including WVSA bilingual staff, if any, and contract vendors, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.

F. Informal Interpreters

1. Informal interpreters may include family members, friends, legal guardians, service representatives or advocated of the LEP customer. WVSA staff will determine whether it is appropriate to rely on informal interpreters depending upon the circumstances and subject matter of the communication.
2. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by WVSA. If possible, WVSA should accommodate an LEP customer's request to use an informal interpreter in place of a formal interpreter.
3. If an LEP customer prefers an informal interpreter, after WVSA has offered free interpreter services, the informal interpreter may interpret. In these cases, the customer and interpreter should sign a waiver of free interpreter services.

G. Outside Resources

1. Outside resources may include community volunteers.
2. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

H. Monitoring

1. WVSA will review and revise this LEP Plan from time to time. The review will include:

- Reports from WVSA's computer business systems on number of WVSA customers who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations;
- Reports from computer business systems and other sources listing the languages used by LEP customers;
- A determination as to whether five percent (5%) of WVSA customers speak a specific language, and, furthermore, have a limited ability to read, write, speak or understand English which trigger consideration of document translation needs as described above; and

- Analysis of staff request for contract interpreters: number of requests, languages requested, costs, etc.

LEP Distribution and Training

The LEP Plan will be:

1. Distributed to all staff;
2. Available at WVSA Administrative Office in Hanover Township, Pennsylvania, 18703;
3. Posted on WVSA's website, www.wvsa.org; and
4. Explained in orientation and training sessions for supervisors and other staff who need to communicate with WVSA customers.

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Effective February 28, 2022