



AgeWell Services of West Michigan	
Policy Name: Limited English Proficiency (LEP) Policy	
Policy No. PS 1.7	Effective Date: 7/1/2019
Approved: <i>Kristen M. Collee</i>	Last Revised: 11/29/2023

SCOPE: AgeWell Services of West Michigan, hereinafter referred to as AWS, is committed to ensuring that no person is excluded from participation in, be denied the benefits of its programs and services to persons with limited English proficiency (LEP). This policy applies to all team members, including paid employees, subcontractors, vendors, and volunteers.

POLICY: AWS is committed to ensuring that no person is excluded from participation in or denied the benefits of its programs and services to persons with limited English proficiency (LEP).

AWS is required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
- The frequency with which LEP individuals meet the program.
- The nature and importance of the program, activity or service provided by the program to people’s lives.
- The resources available to the grantee / recipient or AWS and costs.

Factor 1: Number / Proportion of LEP Persons in Service Area

AWS examined the U.S. Census Bureau 2021 American Community Survey 5-year Estimates and was able to determine that 6.8%, or 32,721 people within the AWS service area of Muskegon, Oceana and Ottawa counties of West Michigan, age five (5) and older spoke a language other than English. Of the 32,721 reporting they speak other languages than English, 2.4% or 11,486 of respondents speak English less than “very well”. The Spanish language comprised the largest non-English speaking language group with 4.5% or 21,680 individuals. The other largest non-English speaking language group was Asian Pacific with 1.2% or 5,593 individuals.

Factor 2: Frequency of Contact with LEP Persons

Via verbally surveying team members since August 2023, AWS has had 0 requests for interpreters and / or translated AWS documents. The team members have had little to no contact with LEP individuals.

Factor 3: Nature and importance of the program, activity or service provided by the program in people's lives.

Access to the services provided by AWS is critical to the lives of many adults 60 and older in the service area. Many people depend on AWS services for meals, motion and morale. Because of the essential nature of the services and the importance of these programs in the lives of many older adults, there is a need to ensure that language is not a barrier to access.

Factor 4: The resources available to AWS and overall costs.

AWS assessed the available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost, and which documents would be the most valuable to be translated when the populations would support it.

Final Decision

After analyzing the four factors, AWS does not feel that a formal LEP plan is needed at this time. However, we have a procedure in place for when a formal LEP plan is needed (see PS 1.7.2).

ENFORCEMENT: This policy is enforced by the Senior Transportation Program Senior Manager, Mission Services Senior Manager, Mission Services Director, Food Services Director, Finance Director, Human Resources Director, Advancement Director and Executive and Associate Directors.

REFERENCES:

PS 1.7.2 Limited English Proficiency (LEP) Procedure



AgeWell Services of West Michigan	
Policy Name: Limited English Proficiency (LEP) Procedure	
Policy No. PS 1.7.2	Effective Date: 7/1/2019
Approved: <i>Kristen M. Collee</i>	Last Revised: 11/29/2023

SCOPE: AgeWell Services of West Michigan, herein referred to as AWS, is committed to ensuring that no person is excluded from participation in or be denied the benefits of its programs and services to persons with limited English proficiency (LEP).

PROCEDURE: AWS will use the following guidelines and resources to assist persons with limited English proficiency.

Immediate Interpreter

AWS will have the U.S. Census Bureau’s “I Speak Cards” available at AWS locations. Although team members may not be able to provide immediate translation assistance, cards will be utilized to identify language needs.

If an interpreter is needed immediately, in person or on the telephone, team members will use the “I Speak Cards” to help determine what language assistance is needed. Team members shall then contact www.languageline.com for assistance. On the Language Line webpage, staff will select the **Need an Interpreter Now** link in the popup window and follow the directions to receive an access code.

Other Language Assistance Measures

Other language assistance measures include identification of LEP persons by case managers, social workers, other social service agencies and team members and documentation of language assistance requests from LEP persons. Documentation of language assistance requests prioritizes written collateral that requires translation.

Team Member Training

During team member orientation and occasionally during refresher trainings, AWS will educate team members on the following procedures:

1. Understanding the Title VI Policy, Procedure and Appendices (reference HR 3.27, 3.27.2 and 3.27.3) and LEP Policy and Procedure (reference PS 1.7 and 1.7.2).
2. How to access language assistant services via www.languageline.com.
3. Document language assistance requests.

4. The procedure if a Title VI and / or LEP complaint is filed (reference HR 3.27.3 for both complaints).

Outreach

Outreach measures include resources available from case managers and social workers, bi-lingual team members and coordination with other social service agencies for LEP resources and assistance as the need arises. Additionally, AWS will add Title VI Policy, Procedure and Appendices (reference HR 3.27, 3.27.3 and 3.27.3) to website.

Updating LEP Procedure

The LEP procedure will be updates as census data, the number of LEP requests and team member experiences change.

Dissemination of LEP Procedure

Copies of PS 1.7 and 1.7.2 will be kept in all office locations and given to team members and any coordinating agencies or individuals upon request.

Questions or Comments

Any questions or comments regarding PS 1.7 and 1.7.2 should be directed to:

Title VI Coordinator Contact Information

AgeWell Services of West Michigan
Attn: Jennifer Drury, Title VI Coordinator
275 W Clay Ave Ste 100, Muskegon, MI 49440
Phone: (231) 733-8635
Fax: (231) 733-8635
Email: jennifer@agewellservices.org

ENFORCEMENT: This policy is enforced by the Senior Transportation Program Senior Manager, Mission Services Senior Manager, Mission Services Director, Food Services Director, Finance Director, Human Resources Director, Advancement Director and Executive and Associate Directors.

REFERENCES:

HR 3.27 Title VI Policy
HR 3.27.2 Title VI Procedure
HR 3.27.3 Title VI Appendices
PS 1.7 Limited English Proficiency (LEP) Policy