# CITY & BOROUGH OF WRANGELL

EXHIBIT G | TITLE VI LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH-PROFICIENT PERSONS



### 1. SUMMARY STATEMENT

The City and Borough of Wrangell, Alaska (the "CBW") is responsible for ensuring that all citizens, including persons with disabilities and limited English proficiency (LEP), have equal access to essential public information.

The CBW will ensure that essential public information is available in the appropriate languages for the geographic region of southeast Alaska, specifically Wrangell.

The CBW has evaluated the population of persons with limited English proficiency in Wrangell, Alaska, and has consulted the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Policy Guidance Concerning Recipients' responsibilities to LEP Persons, published on January 14, 2005 (70 FR 74087).

#### 2. DEFINITION OF A LIMITED ENGLISH PROFICIENT INDIVIDUAL

Limited English proficient (LEP) refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English. This definition includes individuals with sensory impairments (SI), who are Deaf or hard of hearing and communicate using American Sign Language (ASL), have speech impairments, or are blind or have visual impairments. LEP individuals may be entitled to language services or communication assistance for a service, benefit, or program that receives federal aid.

#### 3. FOUR FACTOR ANALYSIS

The City and Borough of Wrangell (the "CBW") is required to take reasonable steps to ensure meaningful access to Limited English Proficient (LEP) persons. This "reasonableness" standard is intended to be flexible and fact-dependent. The CBW conducted an individualized assessment that balances the following four factors;

FACTOR 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

The City and Borough of Wrangell took the following action to identify the number of LEP persons in Wrangell, Alaska.

- Downloaded Census Table B1602 (Detailed Household Language by Household Limited English-Speaking Status)
   from the 2022 American Community Survey 5-year estimates (most recent available).
- · Filtered data to be specific to the City and Borough of Wrangell.
- · Summed totals for all languages and compared percentages for each language.
- Analyzed data to determine what percentages if any displayed persons within a household that did not speak English "very well".
- Determine whether the total percentage of "limited English-speaking households" exceeded 5% of the total population.
- · The City and Borough of Wrangell has a population of 2,127 with 928 households.
- The top languages spoke in households within the community are Spanish, German, other Asian Pacific languages, and unspecified languages. The highest percentage of non-English languages is Spanish with 3%.
- Table B10062 results for the CBW does not reflect any households that fall under the definition of Limited English Proficient (LEP) persons.

# EXHIBIT G | TITLE VI LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH-PROFICIENT PERSONS CONTINUED FROM PAGE 1

FACTOR 2: The frequency with which LEP individuals come in contact with the program, activity, or service.

The frequency with which LEP persons encounter the City and Borough of Wrangell is extremely rare.

FACTOR 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program.

The nature and importance of the programs, activities, and services provided by the CBW are critical to the community. The CBW provides for the critical infrastructure of the community, as well as front-facing services for the public. The CBW plays a crucial role in job creation in Wrangell, Alaska. CBW projects receiving federal funds are in gated areas with limited to no public access.

Projects involving port and harbor infrastructure are more frequented by the public, as well as capital projects within front-facing public facilities such as City Hall, Library, and Parks & Recreation. Services steaming from front-facing facilities are not critical. Denial or delays in access are not life-threatening for LEP persons.

FACTOR 4: The Resources Available to the Recipient and Costs.

The CBW is taking all reasonable steps to provide access for LEP persons. The availability of resources, however, may limit the provision of language services in some instances. "Reasonable steps" may cease to be reasonable when the costs imposed substantially exceed the benefits.

#### 4. LANGUAGE ASSISTANCE

The City and Borough of Wrangell will aid any LEP persons on an as-needed basis. This aid may include, but is not limited to:

- Written translation services;
- Oral interpretation services;
- · Referrals to community liaisons proficient in the language of LEP persons whenever possible;
- · Within reason, the CBW will provide language services at public meetings and community events. We request at least 48 hours' notice of required language services.

#### 5. LANGUAGE SERVICE PROTOCOLS

- Translated content will be posted on the CBW's website and a bulletin board accessible by the public at the CBW's City Hall building.
- Written Contact, in the form of email, letters, etc., and related responses are routed to either internal resources or external translation service provider(s) for translation, as needed.
- Phone calls from persons of limited English proficiency may be transferred to an interpreter line facilitated by a third party.
- · Prioritize utilizing qualified community interpreters whenever possible to ensure effective communication.
- · If necessary CBW will contract with vendors for telephone, document, and web content translation services.

## 6. STAFF TRAINING

Staff will receive training to identify and effectively communicate with Limited English Proficient (LEP) individuals. This includes access to a comprehensive list of qualified translation services (both internal vendors and community

# EXHIBIT G | TITLE VI LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH-PROFICIENT PERSONS CONTINUED FROM PAGE 2

interpreters) to ensure seamless communication during CBW operations.

### 7. MONITORING AND UPDATING LANGUAGE ACCESS PLAN

The CBW will monitor and update the Language Access Plan, including seeking input from beneficiaries and the community on how it is working and what other actions should be taken, as needed.

Citizens with disabilities or those who need technical assistance can contact the City and Borough of Wrangell for assistance, either via:

- Telephone: 907-874-2381
- · Email: kthomas@wrangell.com
- Physical Mail: City and Borough of Wrangell, PO Box 531, Wrangell, Alaska 99929
- · In Person: 205 Brueger Street, Wrangell, Alaska 99929

The CBW website, www.wrangell.com, will contain links to its Action Plan, amendments, and reports.