



# Limited English Proficiency Plan

## 1 Introduction

The Idaho Department of Environmental Quality (DEQ) recognizes the importance of meaningful access for Idaho's citizens. Language barriers can impede accurate communication and inhibit individuals with limited English proficiency (LEP) from accessing important health services.

This plan establishes guidelines to ensure essential communication with Idaho citizens and comply with Title VI of the Civil Rights Act of 1964 (Executive Order 13166 and 40 CFR 7).

## 2 LEP Plan

DEQ will provide timely and meaningful access to DEQ's programs and activities for individuals with limited English proficiency in the language they are most comfortable communicating.

DEQ's nondiscrimination coordinator will oversee implementation of the LEP plan and grievance procedures, provide training, and monitor its effectiveness (section 4).

## 3 Four-Factor Analysis

DEQ will consider four factors when assessing language needs and determining steps to ensure access for LEP individuals.

1. **The number, or proportion, of LEP individuals likely to encounter a DEQ program or service**—This factor measures the number or percentage of LEP individuals that might encounter a DEQ program or service. Appendix A provides a breakdown of LEP speakers by county.

If at least 5% of a community speaks a language other than English, staff must continue working through the four factors to determine what, if any, language assistance services are needed.

**Table 1. Percentage of Idaho households that are limited English-speaking by county.**

County	%	County	%	County	%	County	%
Ada	1.6	Butte	0.1	Gem	3.5	Minidoka	7.9
Adams	0.3	Camas	2	Gooding	5.6	Nez Perce	0.5
Bannock	1.4	Canyon	2.8	Idaho	0.8	Oneida	2.2
Bear Lake	0.7	Caribou	1.7	Jefferson	2	Owyhee	7.5
Benewah	0.6	Cassia	5.6	Jerome	10	Payette	1.7
Bingham	1.9	Clark	26.9	Kootenai	0.7	Power	8.7
Blaine	5.7	Clearwater	0.5	Latah	0.5	Shoshone	1.4
Boise	0.2	Custer	0.5	Lemhi	0.5	Teton	3.3
Bonner	0.3	Elmore	3.2	Lewis	0.5	Twin Falls	2.6
Bonneville	1.5	Franklin	1.2	Lincoln	7.5	Valley	0.5
Boundary	0	Fremont	3.4	Madison	0.9	Washington	4.1

Source: US Census Bureau, 2021.

2. **The frequency with which LEP individuals encounter a DEQ program**—This factor measures the frequency at which DEQ staff has, or could possibly have, contact with LEP individuals. Encounters include office visits, telephone conversations, attendance at outreach events, website, social media, and public meetings. The factor also measures the frequency at which DEQ might need to proactively share information with LEP individuals (without a direct request).

DEQ has limited information on this factor and will need to create procedures to collect this data. In the interim, DEQ can use data from other agencies to estimate frequency.

3. **The nature, importance, or impact of the program, activity, or service on peoples' lives**—This factor measures the impact DEQ's documents or services have on peoples' lives. When determining language assistance needs, DEQ should consider how important certain information is on the health and well-being of an individual.

For example, this information includes air quality advisories, water quality advisories, boil advisories, and public notices that will likely have a greater impact on an individual's well-being than marketing collateral or promotional material.

4. **The resources available to DEQ for outreach and costs associated with that outreach**—This factor compares the reasonable steps DEQ must take under federal law to ensure meaningful access to programs, services, and activities by LEP individuals against the costs associated with doing that outreach.

On a case-by-case basis, DEQ staff will work with the nondiscrimination coordinator to identify the most cost-effective means of delivering timely, accurate, and effective language services to LEP individuals.

## 4 LEP Plan Implementation

Staff can take these steps to identify an LEP need, provide language assistance, and notify the public of LEP services.

1. **Identify LEP individuals who need language assistance**—DEQ will use any of the following measures to identify individuals who may need language assistance.
  - **Tracking LEP contact**—DEQ staff who regularly communicate with the public (e.g., front desk staff, public records request custodians, complaint response staff, social media manager, and webmaster) will document and track requests for language assistance received via meetings, telephone calls, and events. This information will be reported monthly to DEQ’s nondiscrimination coordinator.
  - **Language identification**—DEQ will offer US Census Bureau’s “I Speak” cards at public counters, document the language assistance request in the tracking form, and refer the request to the nondiscrimination coordinator.
  - **Identifying vital documents**—Staff will use the vital document translation guidance to identify vital documents for translation in the languages “regularly encountered” in a specific community. The term “languages regularly encountered” means any language spoken by at least 5% of the population served by a particular agency program, service, or activity.
  - **Universal access goal**—Each division is encouraged but not required to provide universal access to interpretation services even if the community served does not meet the 5% threshold.
  
2. **Language assistance measures**—The language assistance options listed here include the most common and cost-effective methods. In cases where the information is important and technical, staff should use a professional translation service.
  - **Accommodation notices**—DEQ will ensure that print and electronic public meeting notices include instructions for requesting an accommodation and direct the public to DEQ’s language assistance web page.
  - **Opportunity to request a language assistance accommodation**—DEQ will include in the footer of all vital documents a notice informing the public of the opportunity to request an accommodation or translation service.
  - **Enlist bilingual volunteers**—DEQ will survey employees in each division and create a list of staff who are able and willing to translate documents. DEQ’s nondiscrimination coordinator will also educate employees about the existence of the multilingual employees in the agency. Senior managers can update individual position description forms to reflect this increased workload.
  - **Enlist community groups**—The nondiscrimination coordinator and any volunteers will reach out to community groups who might provide free translation assistance (e.g., Idaho Migrant Council, Idaho Legal Aid Services, Community Council of Idaho, Idaho Office for Refugees, English Language Center, College of Western Idaho, and Boise State West Campus-ESL training).
  - **Language identification**—DEQ will provide US Census Bureau’s “I Speak” cards at each reception desk.

- **Language assistance technology**—DEQ will train staff to use translation apps during field work.

When an interpreter is needed, in-person or on the telephone, and DEQ staff has exhausted the above options, contact DEQ's nondiscrimination coordinator.

3. **Providing notice to LEP persons**—DEQ can notify LEP individuals of language and document assistance services in the following ways:
  - Provide Language Identification Flashcards (“I Speak” cards), which allow an LEP individual to point to the language that the individual speaks.
  - Include a statement on the agency’s website indicating that language assistance is available.
  - Include a statement on vital documents indicating that language assistance is available.

**Vital documents**—Documents are considered vital if they convey information critically affecting the ability of an individual to make decisions about their health or participation in a program. All vital documents will be translated or be made available for translation into “prominent language(s)” other than English, even if the non-English language spoken does not exceed 5% in community.

The term “prominent language(s)” means the non-English language most regularly encountered in a community. Staff, in coordination with the nondiscrimination coordinator, will determine the appropriate language(s) by reviewing demographic and census data and identifying the most appropriate language(s).

**Informal documents**—For less formal documents such as marketing collateral, staff are encouraged to use cost-effective methods such as coordinating with bilingual staff or using community resources such as colleges and universities or local community groups (e.g., Idaho Migrant Council, Idaho Legal Aid Services, Community Council of Idaho, Idaho Office for Refugees, English Language Center, and Boise State West Campus-ESL training).

4. **Training staff**—DEQ’s nondiscrimination coordinator will host an annual training for staff to clarify obligations to provide meaningful access to information and services for LEP persons. Training topics can include:
  - Understanding the Title VI LEP responsibilities
  - What language assistance services DEQ offers
  - Specific procedures to follow when encountering an LEP person
  - How to use the “I Speak...” multilanguage identification flashcards
  - How to contact translation services
  - How to access Google Translate on public access computers
5. **Monitoring and updating the LEP plan**—DEQ’s nondiscrimination coordinator will review this plan annually and report to senior management at the end of each calendar year.

## **5 LEP Plan Dissemination**

An electronic version of this plan is available at <https://www.deq.idaho.gov/about-us/accessibility/language-services/>. Hard copies of the plan will be provided to any individual or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

## **6 LEP Contact Information**

DEQ Nondiscrimination Coordinator  
1410 N. Hilton Street  
Boise, ID 83706  
[accessibility@deq.idaho.gov](mailto:accessibility@deq.idaho.gov)  
(208) 373-0271

## Appendix A

County	Total households	% LEP households	% LEP households (Spanish)	% LEP households (Other Indo-European Languages)	% LEP households (Asian and Pacific Island languages)	% LEP households (Other languages)
Ada County	173353	1.6	13.2	14	18.6	26.3
Adams County	1757	0.3	10	0	0	0
Bannock County	31155	1.4	12.5	7.4	24.7	20.3
Bear Lake County	2424	0.7	7.9	0	0	40.9
Benewah County	3418	0.6	22	0	0	0
Bingham County	14989	1.9	13.3	0	16.7	1.3
Blaine County	7995	5.7	40.5	0	0	0
Boise County	3205	0.2	4.2	0	0	0
Bonner County	17537	0.3	6.9	5.4	6.1	0
Bonneville County	39768	1.5	13.5	1.1	11.8	8.4
Boundary County	4653	0	0	0	0	0
Butte County	967	0.1	0	14.3	0	0
Camas County	394	2	100	0	0	0
Canyon County	72807	2.8	15.8	7.4	7.1	23.5
Caribou County	2538	1.7	37.6	0	0	0
Cassia County	7711	5.6	23.7	7.8	36.9	25.6
Clark County	290	26.9	66.1	0	0	0
Clearwater County	3555	0.5	7	26.7	0	0
Custer County	1774	0.5	18.8	0	0	0
Elmore County	10606	3.2	25.4	0	5.9	28.6
Franklin County	4397	1.2	16.9	16.1	0	0
Fremont County	4347	3.4	28	22.9	0	0
Gem County	6683	3.5	47.2	0	0	0
Gooding County	5469	5.6	31.1	0	0	0
Idaho County	6407	0.8	16.2	0	0	31.3
Jefferson County	8791	2	15	0	36.1	0
Jerome County	8022	10	39.8	0	23	0
Kootenai County	62304	0.7	19.5	4.8	24.9	2.7
Latah County	15422	0.5	4.8	10.9	6.4	1
Lemhi County	3582	0.5	15.1	0	0	41.7
Lewis County	1646	0.5	11.1	0	0	20
Lincoln County	1724	7.5	34	0	0	0
Madison County	11016	0.9	4.5	0	11.4	0
Minidoka County	7250	7.9	28.2	0	0	0
Nez Perce County	16384	0.5	7.4	6.5	12.7	5.8

Oneida County	1615	2.2	62.1	0	0	0
Owyhee County	4321	7.5	40.7	0	0	0
Payette County	8876	1.7	12.8	0	28	0
Power County	2633	8.7	29.6	0	100	0
Shoshone County	5466	1.4	23.6	44.9	0	0
Teton County	3707	3.3	23.3	9.4	0	0
Twin Falls County	31146	2.6	14.2	16.7	13.3	52.9
Valley County	3869	0.5	11.4	0	0	0
Washington County	4035	4.1	35.7	0	40.6	0
<b>Idaho State Total</b>	<b>630008</b>	<b>2.00</b>	<b>18.8</b>	<b>9.3</b>	<b>15.9</b>	<b>18.1</b>