



## Standard Administrative Policy and Procedure

**Subject:** Limited English Proficiency Plan

**Number:** UW SAP 4.4

### I. PURPOSE

The purpose of this Limited English Proficiency Plan (LEP) is to eliminate or reduce language as a barrier to accessing University of Wyoming (UW) programs, activities, or events, consistent with Title VI of the Civil Rights Act of 1964, the Title VI Regulations and Presidential Executive Order (EO) 13166.

### II. DEFINITIONS

**Contact:** Interactions in-person; over the telephone, through written correspondence, including email; websites; newsletters; social media; meetings; investigations and interviews; community engagement events and activities; and documents explaining recipient programs. Contacts are with students, faculty, staff, and members of the public.

**Critical Area:** A UW division, unit, or office that offers programs, activities, or services that may have greater health and safety or legal consequences for the participant, for example, law enforcement, housing, health and wellness, parking and transportation, and complaint/grievance processes.

**Interpretation:** Oral or spoken transfer of a message from one language into another language.

**Language Assistance:** Interpreting and/or translating vital information to LEP persons.

**LEP:** “Limited English proficient” or “limited English proficiency” means not speaking English as a primary language and a limited ability to read, speak, write, or understand English.

**PAS:** Programs, activities, and services.

**Translation:** The written transfer of a message from one language into another language.

### III. POLICY

In accordance with Title VI and the Executive Order, UW considers discrimination on the basis of an individual’s limited English proficiency (LEP) to be a form of national origin

discrimination prohibited under the University of Wyoming's Equal Opportunity, Harassment, and Nondiscrimination Standard Administrative Policy and Procedure (SAP) (see [https://www.uwyo.edu/regs-policies/files/docs/policies/eo-harassment-nondiscrim-sap-approved\\_8-14-20.pdf](https://www.uwyo.edu/regs-policies/files/docs/policies/eo-harassment-nondiscrim-sap-approved_8-14-20.pdf).) UW is committed to the accessibility of our programs and activities to those with Limited English Proficiency (LEP). To that end, the University will take reasonable steps to make available appropriate alternative language formats to those with limited English proficiency upon request.

#### **IV. ASSESSMENT**

- A.** To prepare this Plan, administrators with oversight of critical areas assessed the following factors based on historical experience for programs, activities, and services (PAS):
  - 1. Approximate number and proportion of LEP persons in contact annually;
  - 2. Frequency of contact with LEP persons and the primary language(s) spoken;
  - 3. Nature and importance of each PAS in providing access for LEP persons; and
  - 4. Resources currently being used to provide language assistance to LEP persons.
- B.** The goal of the assessment was to identify UW's most common and important points of contact and encounters with LEP persons. As part of its assessment, the University considered both U.S. Census Data as well as additional internal data received in connection with this assessment.
- C.** While minimal interactions have been brought to the attention of ODEI, UW has determined that interactions with LEP individuals are more likely to occur in offices related to student services such as Financial Aid, Registrar, and International Studies, as well as offices offering services to the public such as Transportation, Student Affairs, UWPD, UW Libraries, and Student Health Services.

#### **V. LANGUAGE ASSISTANCE PLAN**

- A.** UW will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits. UW will provide all reasonable assistance needed to comply with this policy without cost to anyone accessing the services.
- B.** UW either already provides or is in the process of providing language assistance through:
  - 1. Developing and updating a list of competent Bilingual Staff;
  - 2. Distributing and providing internal instructions to the UW campus for how to access interpretation or translation services through a third-party vendor;
  - 3. Translating vital documents into frequently encountered languages as identified by the U.S. Census Data or upon request when determined reasonable;

4. Advertising and distributing UW's English as a Second Language (ESL) Resources; and
5. Providing I Speak Cards to individuals with frequent public facing interaction or upon request.

### **C. Notice to LEP Persons**

UW maintains information about the availability of language assistance on the ODEI's website. In addition, UW may post physical notices in various campus buildings and on additional UW campus websites. All such notices will: (1) inform LEP persons that they are entitled to meaningful access to UW's PAS and may be qualified to receive language assistance; (2) specify how to access language assistance services; and (3) provide information about how an individual can file a complaint.

### **D. Plan Distribution and Training**

1. UW will post and maintain this Plan on ODEI's website. ODEI will work with appropriate campus officials to identify and disseminate the plan and information to the offices they identify that most often interact with the public and LEP individuals.
2. ODEI will make training available to UW employees, particularly those who interact more regularly with members of the public in critical area PAS, that includes the following topics:
  - a. Information about UW's Discrimination and Harassment Policy and responsibility to provide meaningful access to LEP persons.
  - b. Awareness of language assistance services for qualified LEP persons.
  - c. How to report a Title VI/LEP complaint.

### **E. Monitoring, Assessing, and Updating the Plan**

1. UW will periodically review this Plan and inquire with administrators on their experience with contacts with LEP persons. This Plan will be updated when it is clear that higher concentrations of LEP persons are present in UW service area.
2. UW's review and updates will consider the following:
  - a. The number of LEP person contacts encountered annually.
  - b. How the needs of LEP persons have been addressed.
  - c. The current LEP population in the service area.
  - d. Whether the need for language assistance has changed.
  - e. Whether language assistance has been effective and sufficient to meet needs.
  - f. Whether financial resources are sufficient to fund language assistance needs.
  - g. Whether UW is complying with the goals of this Plan.
  - h. Whether complaints have been received and are being adequately resolved.

**Responsible Division/Unit:** Office of Diversity, Equity, and Inclusion

**Source:** None

**Links:** <http://www.uwyo.edu/regs-policies>

**Associated Regulations, Policies, and Forms:** None

**Approved:** 8/7/2023