

**BOISE STATE UNIVERSITY
LIMITED ENGLISH PROFICIENCY (LEP)
PLAN**

2021-2023

**Boise State University
Limited English Proficiency Plan**

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BOISE STATE UNIVERSITY LIMITED ENGLISH PROFICIENCY PLAN

I. TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. 2000d, states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

II. EXECUTIVE ORDER 13166

Executive Order 13166 “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. The DOJ’s Policy Guidance provided a four-factor test to be used assessing needs of an organization’s LEP persons, and in determining what should be done to best ensure access for LEP persons.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, state-controlled institutions of higher education, local agencies, governments, private and non-profit entities, and sub-recipients.

III. FEDERAL TRANSIT ADMINISTRATION (FTA) CIRCULAR 4702.1A

FTA Circular 4702.1A clarifies the responsibilities of recipients of U.S. Department of Transportation (DOT) financial assistance pursuant to Title VI and provides guidance on how those recipients may fulfill their responsibilities to limited English proficient (LEP) persons.

IV. FOUR-FACTOR ANALYSIS

Organizations should consider four factors when assessing language needs and determining what steps should be taken to ensure access for LEP persons. The four factors are:

1. The number or proportion of LEP persons in the University’s service area that may be served by the University;

2. The frequency with which LEP persons come in contact with University services;
3. The nature and importance of the programs and services provided by the University to the LEP population; and
4. The resources available to the University for LEP outreach as well as the cost associated with that outreach.

1. The number or proportion of LEP persons in the University’s service area that may be served by the University.

The University examined the 2019 U.S. Census data to determine the proportion of LEP persons in the University service area¹ that may be served or are likely to encounter a University service. An analysis of the data indicates that in Boise, Spanish speakers are the primary LEP persons likely to be served by the University.

As of the 2019 Census data², the total population within the City of Boise was 228,959. The estimated population of persons age five years and older is was 215,908. In Boise, Spanish is the language spoken at home by 11,002 adults (18 years old and up), or 6% of the adult population. An additional 3,559 children (aged 5-17) speak Spanish at home, 10.6% of the child population. Of the 14,561 persons who speak Spanish at home, 7,305 (or 3.4% of the total population who are five years and older) report speaking English less than “very well.” In addition, 4,629 citizens (or 2.2% of the population who are five years and older) report speaking other Indo-European languages, with 1,324 of them (or .6% of the population who are five years and older) speaking English less than “very well.”

A small percentage of the Boise population speaks Asian and Pacific Islander languages (1.8% of the population five years and older) and other languages (1.4% of the population five years and older). In all it is estimated that 14,610 persons who are 5 years or older, or 6.8% of the population of Boise speaks English less than “very well.”

2. The frequency with which LEP individuals come in contact with a University service.

The University assesses the frequency with which staff have, or could have, contact with LEP persons by using Census data, local government agency data, telephone inquiries, and verbal surveys of staff in the offices most likely to encounter LEP persons.³ With the exception of Transportation and

¹ The University occupies 175 acres in close proximity to downtown Boise, Idaho. Though its service area is smaller than the city proper, the University believes that Census data for Boise is representative of the University’s service area.

² <https://www.census.gov/quickfacts/boisecitycityidaho>

³ Areas surveyed included Financial Aid, Payments and Disbursements, Account Maintenance, food service stations, Human Resource Services, Transportation and Parking Services (including shuttle drivers) and library staff.

Parking Services (TPS), which reported between 5-10 requests for assistance by Spanish speaking LEP persons, no other staff members were able to recall a situation in which an LEP person requested language-related assistance in the past year.

In addition to reviewing Census data, the University also looks at student data when updating its LEP plan. As of the spring 2020 semester, the university had approximately 1355 students, at both the undergraduate and graduate level, who had identified a language other than English as their native language. The majority of these students are from India, Bangladesh, Saudi Arabia, China, and Nepal. With the exception of foreign language courses, University courses are generally taught in English. As such, students for whom English is a second language must demonstrate a level of proficiency on par with a university-level English course before enrollment.

Proficiency may be demonstrated in several ways, the most common of which is by attaining a qualifying score on the International English Language Testing System (IELTS) or Test of English as a Foreign Language (TOEFL) exam. Students may also enroll in the University's Intensive English Program, which offers five sessions of English language instruction every year to international students of all proficiency levels. The program helps students in transition from an English language program to an academic program at any university.

Based on the foregoing analysis, the University has determined that although minimal, encounters with LEP persons are most likely to occur in transit-related activities.

3. The nature and importance of the program, activity, or service provided by the University to the LEP community.

Transportation and Parking Services operates a circulating shuttle system during the academic year (August – May). The shuttles run from 7 am - 10 pm Monday – Thursday and from 7 am - 5:30 pm on Friday.

There are 20 shuttle stops on the University campus shuttle route (9 of these stops are on the campus proper, the others are in the surrounding urban area). The University's compact size (175 acres) and generous bicycle and sidewalk network make the campus easy to access on foot. Furthermore, the campus is flat and the weather in Boise is moderate. Because the University campus is relatively small and service is limited to campus locations, shuttle service is viewed primarily as an amenity and is not critical to providing access to classes and/or work. In other words, if the shuttle service is not available, the University will still be able to fulfill its mission. In addition, the University supports bicycling, walking, carpooling, vanpooling, car sharing and driving personal vehicles and the shuttle service is therefore only one of many transportation options.

The University is located in the greater Treasure Valley, which is served by Valley Regional Transit (VRT), a local organization providing public

transportation services in Ada and Canyon County. Through a ride share agreement, University faculty, staff and students may use VRT for no cost and the University's shuttle service is open to any individual at no cost regardless of affiliation with the University. Additionally, although no VRT-related services are provided the University's Transit Center is considered a shared facility with VRT.

4. The resources available to the University and the overall costs.

The University assessed its available resources that could be used to provide language assistance. This included identifying bilingual staff, determining costs associated with a language line on an as-needed basis, determining what documents should be translated, and deciding what level of staff training is needed.

After analyzing the four factors, the University developed the plan outlined in the following section for assisting persons with limited English proficiency.

V. LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

1. How to Identify an LEP Person who Needs Language Assistance

The University will use the following measures to identify individuals who may need language assistance:

- Examine requests for language assistance from past meetings and events (both transit and non-transit alike) to anticipate the possible need for assistance at upcoming meetings;
- Have the Census Bureau's "I Speak" cards available at meeting or event sign-in tables. While staff may not be able to provide translation assistance at that particular meeting, the cards can be used to identify language assistance needs at future meetings; and
- Survey shuttle drivers and other front-line staff regarding any direct or indirect contact with LEP individuals.

2. Language Assistance Measures

The University either already provides or is in the process of making available the following language assistance tools:

- "I Speak" cards and instructions for use;
- Reminder to develop and maintain list of bilingual or multilingual employees who can assist LEP persons;

- Language Line instructions;⁴ and
- Translating important documents and notices into frequently encountered languages⁵.

3. TPS Staff Training

Providing meaningful access to University services is a shared obligation of all employees. The Title VI Coordinator provides education and instruction to offices/departments/programs on campus regarding how to assist LEP persons. Key topics include:

- Understanding Title VI LEP responsibilities;
- Creating awareness of language assistance services the University offers;
- Specific instructions on how to assist LEP persons; and
- Other Title VI obligations.

4. Providing Notice to LEP Persons

The University uses qualified service providers to translate official documents to ensure accuracy of translations. For less formal documents, including flyers and advertisements for entertainment events, University departments are responsible for ensuring translation services are provided by qualified individuals.

There are several ways in which the University and its employees provide notice to LEP persons that language assistance is available including:

- Making translated documents easily accessible in both electronic and paper formats;
- Providing front-line employees with “I Speak” cards to facilitate quick access to an interpreter via the Language Line; and
- Where applicable, providing notice of availability of language services.

⁴ The University has provided 40 offices/departments/programs across campus with laminated “I Speak” cards and instructions to access the Language Line (including the phone number and University’s unique PIN code). The “I Speak” cards and Language Line instructions were distributed to areas previously reporting, or most likely to encounter, LEP persons.

⁵ Based on the number of Spanish speaking individuals relative to other non-English speakers in the University’s service area, the University has translated its Title VI awareness posters and Title VI Complaint Form into Spanish. The bilingual Title VI posters are found in many locations across campus; the Spanish Title VI Complaint Form is easily accessible on the University’s website.

5. Monitoring and Updating the LEP Plan

This plan is designed to be flexible and easily updated to accommodate changing needs. At a minimum, the University will follow the Title VI Plan update schedule for the LEP Plan.

Each update should examine plan components including:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the University's service area?
- Has there been a change in the types of languages for which translation services are needed?
- Is there still a need for continued language assistance for previously identified University programs? Are there other programs that should be included?
- Have the University's available resources, such as technology, staff, and financial assistance changed?
- Has the University fulfilled the goals of the LEP Plan?
- Were any complaints received?

VI. DISSEMINATION OF THE LEP PLAN

This plan is available for download on the University's Office of Institutional Compliance website at <https://www.boisestate.edu/tixie/title-vi/>. If you have any questions regarding Title VI compliance or this plan, please contact:

Title VI Coordinator
Office of Title IX and Institutional Equity,
University Plaza, Suite 250
960 Broadway Ave
Boise, ID 83706
(208) 426-1258
tixie@boisestate.edu

- | | |
|--|------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p> | 1. Arabic |
| <input type="checkbox"/> <p>Խոսողո՞ւմ ե՞սք նշո՞ւմ կատարե՞ք այս քանակուսու՞մ, եթե խոսո՞ւմ կա՞մ կարո՞ւմ ե՞ք հայերեն:</p> | 2. Armenian |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p> | 3. Bengali |
| <input type="checkbox"/> <p>ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p> | 4. Cambodian |
| <input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p> | 5. Chamorro |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p> | 6. Simplified Chinese |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p> | 7. Traditional Chinese |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p> | 8. Croatian |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p> | 9. Czech |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p> | 10. Dutch |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p> | 11. English |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p> | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérte vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish