



State of Vermont
Department of Libraries
60 Washington Street, Suite 2
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Agency of Administration

Vermont Department of Libraries
Policy for Service to Persons with Limited English Proficiency (LEP) Related to IMLS LSTA
Funded Projects
June 20, 2022

LEP Policy Statement

It is the policy of the Vermont Department of Libraries (the Department), not to discriminate against any person who has limited English proficiency (LEP). In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, the Department, as a recipient of federal Library Services and Technology Act (LSTA) funds, 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 free of charge. This commitment applies to all of the Department's IMLS-funded programs and activities and extends to all programs and activities conducted by IMLS-funded subgrants.

LEP Definition

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP."

LEP Meaningful Access Procedures

These procedures apply to all of the Department's IMLS-funded programs and activities and extend to all programs and activities conducted by the Department's IMLS-funded subgrants.

1. Identifying LEP Persons and Their Language
 - Identify the language and communication needs of the LEP person.
2. Identifying Appropriate Language Services
 - Maintain an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff, or technology and telephonic interpretation services where available. Service providers may be found through an internet search or through the State of Vermont's [contractor listing](#).
 - Contact the appropriate bilingual staff member or technology/telephonic interpretation services to interpret, if an interpreter is needed.
3. Providing Notice to LEP Persons
 - Inform LEP persons of the availability of language assistance, free of charge to them, by providing written notice in languages LEP persons will understand.
4. Monitoring Language Needs and Implementation
 - On an ongoing basis, assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its



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procedures. In addition, regularly assess the efficacy of these procedures.

5. All department staff will be provided with notice of this policy and procedure, and those staff that may have direct contact with LEP individuals will be trained in effective communication techniques.
6. Written materials routinely provided in English will also be provided in regularly encountered languages other than English, as determined through the four-factor analysis (below). Vital documents will be translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity.

LEP Policy Application

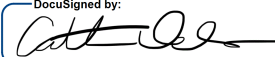
What constitute reasonable steps to ensure meaningful access in the context of federally assisted programs and activities in the area of museums and library services will be contingent upon a balancing of four factors:

1. the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
2. the frequency with which LEP individuals come in contact with the program.
3. the nature and importance of the program, activity, or service provided by the program to people's lives; and
4. the resources available to the grantee/recipient or agency, and costs.

This four-factor analysis necessarily influences the “mix” of LEP services required. The correct mix should be based on what is both *necessary and reasonable* considering the four-factor analysis. Even those who serve very few LEP persons on an infrequent basis should use a balancing analysis to determine whether the importance of the service(s) provided and minimal costs make language assistance measures reasonable even in the case of limited and infrequent interactions with LEP persons.

It is the intention for the LEP policy and procedures to evolve as the Department learns more about the interactions Vermont libraries have with LEP persons and groups, and as the Department gains experience in providing language assistance services.

Approved

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