



City of Castle Rock

Title VI Limited English Proficiency (LEP) Plan February 2025

Title VI Coordinator

Carie Cuttonaro, Clerk-Treasurer

ccuttonaro@ci.castle-rock.wa.us

Table of Contents

Introduction

Part I: Results of the Four-Factor Analysis

Factor 1: Number of LEP persons served

Factor 2: LEP persons frequency of contact

Factor 3: Nature and importance of services

Factor 4: Resources available for LEP outreach and costs

Part II: Implementation Plan

Identifying LEP Individuals and Languages Served

Language Assistance Measures

Staff Training

Notifying Customers

Monitoring, Evaluating, and Updating the LEP Plan

Appendix A: Resources

Federal Government Resources

State and Local Government Resources

City of Castle Rock Resources

Introduction

As a recipient of Federal funds, the City of Castle Rock is required to follow certain federal regulations. Consequently, the City of Castle Rock has laid out this Limited English Proficiency (“LEP”) plan to ensure compliance with both Title VI of the Civil Rights Act of 1964, regarding access to services for people with limited English proficiency, and Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, which directs recipients of federal funding to take reasonable steps to ensure that people with limited English proficiency have meaningful access to their programs and services.

This LEP Plan consists of two primary components, 1) a federally mandated Four-Factor Analysis, and 2) an implementation plan. The Four-Factor Analysis consists of the following four considerations:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The implementation plan consists of the specific steps the City of Castle Rock will take in order to provide services to LEP individuals, including access to language assistance services, outreach regarding those services, staff training, and complaint procedures.

Part I: Results of the Four-Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

To determine the number of LEP individuals in the City of Castle Rock, the City relies on data provided by the United States Census Bureau to identify persons who have another primary language other than English.

Specifically, the City utilized the United States Census Bureau’s [2024 American Community Survey 5-Year Estimates C16001](#) data to determine language speakers over the age of five as a percent of total population. Other than English, the most common languages spoken within the City of Castle Rock are:

Rank	Language	Number of People	Percent of Population
1	Other Indo-European	34	1.70%
2	Spanish	11	0.06%
3	Chinese	10	0.05%

In regards to written translation of vital documents, many federal agencies have specified a ‘safe harbor’ in determining compliance. The ‘safe harbor’ is typically that a language is spoken by 1,000 people or 5% or more of the population, whichever figure is less. Applying this standard to the City

of Castle Rock yields that no other language is above the 'safe harbor' threshold.

Factor 2: The frequency with which LEP persons come into contact with the program.

The City of Castle Rock does not currently possess information specifically relating to the frequency of interactions between LEP individuals and City staff or programs. However, the City has begun analyzing requests for translation and interpretation services to determine which languages are requested most frequently. The City will expect to update on this particular metric in subsequent updates to the LEP Plan.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

The City of Castle Rock provides a number of services that are important to LEP individuals. These include provision of drinking water; police services; emergency housing and mental health referral services; and so on. The City prioritizes language access in programs related to law enforcement, and access to basic services.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The City contracts with Language Line for phone-based interpretation.

Part II: Implementation Plan

Identifying LEP Individuals and Languages Served

The data assembled in the above Four-Factor Analysis indicates that Spanish is the most prevalent non-English languages spoken in Castle Rock. The data further indicates Other Indo-European languages are prominent in Castle Rock.

Language Assistance Measures

Currently, the City offers language assistance free of charge, to customers in the form of telephonic interpretation.

Staff Training

Currently, key staff responsible for the implementation of Title VI programs are trained on understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities. The City has previously and continues to use training materials provided by the Washington State Department of Transportation to accomplish these baseline trainings with the Title VI Coordinator and others likely to come into contact with Title VI programming (e.g. Transportation staff).

Notifying Customers

The City provides notice to LEP individuals of the availability of language services in the following ways:

1. Stating in outreach documents that language services are available.
2. Posting "I Speak" language identification signs at the Finance Office's front desk, as well

as at the Police Department service window. These locations include primarily public-facing staff.

3. Providing a complaint form and procedure for any complainant who believes they may have been discriminated against in a City program or service.

Monitoring, Evaluating, and Updating the LEP Plan

The City of Castle Rock will periodically assess the effectiveness of this LEP Plan and update it as appropriate. The assessment will include reviewing the use of language assistance measures, reviewing population and other data regarding languages spoken in Castle Rock, and speaking with staff members who interact with people who do not speak English or prefer to interact in a language other than English on process improvements and best practices.

Appendix A: Resources

Federal Government Resources:

[Title VI of the Civil Rights Act of 1964](#)

[Regulations Implementing Title VI of the Civil Rights Act of 1964](#)

[United States Census Bureau](#)

[Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*](#)

[Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons](#)

[LEP.gov](#)

[U.S. Department of Labor, LEP Toolkit](#)

State and Local Government Resources:

[WSDOT Title VI Basics for Local Public Agencies](#)

City of Castle Rock Resources:

[Title VI Website](#) (Title VI Reports, including Assurances)

[Title VI Complaint Form](#)