

ORANGE WATER AND SEWER AUTHORITY

Plan to Address Limited English Proficiency among OWASA Customers

INTRODUCTION

The United States Census Bureau defines a Limited English Proficiency (LEP) individual as one who does not speak English as their primary language and has a limited ability to speak, read, write, or understand English. An individual is considered to have a limited ability to access the English language when they speak, read, write, or understand English either “not well” or “not at all”.

The Orange Water and Sewer Authority (OWASA) was established in 1976 by the governing bodies of Orange County and the towns of Carrboro and Chapel Hill as the appropriate structure to acquire and operate the separate water and sewer utilities owned and operated at that time by the two towns and the University of North Carolina. OWASA began operations in 1977 after execution by the University and the towns of Agreements of Sale and Purchase of the three separate water and sewer systems.

Within its service area OWASA provides water, sewer (wastewater) and reclaimed water services to the community, focusing on reliable delivery of high-quality drinking water and wastewater services that effectively protect the environment and public health. It is the owner of the Cane Creek Reservoir located on Cane Creek in Bingham Township, and the lessee/operator of University Lake located on Morgan Creek in Chapel Hill Township, both in Orange County. OWASA owns, manages and operates those Reservoirs and nearby lands, to protect, maintain and provide a high quality, public water supply.

OWASA’s service area primarily encompasses the Towns and Chapel Hill and Carrboro, and is defined by a written agreement between Orange County and the Towns of Chapel Hill, Carrboro, and Hillsborough. OWASA provides service to 21,200 customer accounts within a population of 83,300 people.

OWASA prides itself on its role as a community partner. It consistently strives to ensure that LEP persons are provided meaningful access to OWASA services and activities and seeks to reduce language barriers that may prevent them from accessing these services. As part of its efforts to meet this goal, OWASA has developed this Language Access Plan (LAP Plan or Plan). Through consistent monitoring and updating of this Plan, OWASA will better serve and understand the needs of its customers, and improve the accessibility of services and resources.

DEVELOPING THE LANGUAGE ACCESS PLAN

As a starting point for creating a Language Access Plan, the U.S. Department of Justice recommends completing a Four- Factor Analysis. The Four-Factor Analysis helps OWASA plan and provide language access based on:

1. Number or proportion of LEP individuals in the community
2. Frequency with which LEP individuals come in contact with OWASA services
3. Nature and importance of the services

4. Resources available and costs

These factors create a picture of the needs in the service area. The greater the number of LEP individuals, the greater the frequency of contact with OWASA, and the greater the importance of the service, the more likely language services will be needed. Findings can change over time based on changing community demographics.

Factor 1: Number or proportion of LEP individuals in the OWASA Service Area

Data for this analysis comes from EPA’s environmental justice screening and mapping tool, EJSCREEN, using information gathered from the U.S. Census Bureau’s 2014-2018 American Community Survey 5-Year Estimates. (See the EJSCREEN ACS Summary Report attached to this Plan as Appendix A.) While the majority of the Chapel Hill – Carrboro population is English speaking, 6% of residents are defined as LEP individuals who reported speaking English “less than very well” in the U.S Census Bureau’s American Community Survey. (see table below).

Language Spoken At Home By Chapel Hill-Carrboro Residents		
Languages	Population Estimate	Percent
Total Population	83,233	--
Speak only English	63,922	80.00%
Speak languages other than English	16,298	20.00%
Speak English less than “very well” (LEP)	5,019	6.00%

After English, Spanish is the language most frequently spoken at home by Chapel Hill-Carrboro residents.

Language Spoken At Home By Chapel Hill-Carrboro Residents	
English	80.00%
Spanish	6.00%
Chinese	4.00%
Korean	1.00%
French	1.00%
German	1.00%
Other Indo-European	2.00%
Other Asian	2.00%
Other	1.00%
Data Note: Detail may not sum to totals due to rounding.	

Factor 2: Frequency of Contact

OWASA conducted an internal survey of its departments to determine how often staff in each department receive inquiries from or otherwise interact with people who do not speak English well. Most departments reported that such interaction never occurs or occurs very infrequently, and that in some instances that do occur the interactions are actually misdirected calls meant for the customer service department. The customer service department receives inquiries from non-English speakers approximately once a week, and sometimes more often.

Factor 3: Nature and importance of the services

The OWASA staff survey reported that there are very infrequent instances of the need to communicate with a construction worker on an engineering project, and somewhat more frequent inquiries about water quality. Water quality questions are most often about discoloration, inquiries about lead or copper, requests to have water tested, or questions about a boil water advisory. The Customer Service department handles all interactions with the public about the provision of water and sewer services, including stops and starts, billing, water usage, and payment assistance. Water quality and service inquiries go to the heart of OWASA's mission to provide its customers high quality water, wastewater, and reclaimed water services.

Factor 4: Resources Available and Costs

OWASA will assess the resources available for interpretation, translation, and direct communication with LEP individuals on an ongoing basis, concentrating efforts toward those who speak Spanish. Assessment will include maintenance of the OWASA website, identifying appropriate documents and other communication tools for translation, and maintaining a list of contacts that can assist with interpretation or translation services when needed.

OWASA LANGUAGE ACCESS PLAN

There are a variety of established language assistance approaches that OWASA can use to meet the language needs of its customers. The most common approaches include:

- In-person interpretation
- Remote interpretation (e.g. telephonic, video)
- Translation of written materials

An interpreter converts oral messages from one language to another. A translator converts written text from one language to another.

OWASA's [translatable website](#) is its primary initial means of interaction with the public, supplemented by direct contact with staff and the Board of Directors. The default language on the website is English, but the information on the website can be translated automatically into other languages by selecting a language in the upper right corner of any web page.

In addition to the many resources available through the website, including information about service stops and starts, billing policies, payment assistance, and contact information for staff and the Board of Directors, OWASA will provide access to LEP individuals in the following ways:

OWASA will translate vital documents and emergency communications into Spanish.

- Vital documents include those that are necessary to initiate or terminate water and sewer services. These forms will be available through the website and from the customer service department.
- Customer notifications about emergency situations such as the necessity to boil water in the event of a line repair operation will be disseminated in Spanish and English via email, text, and voice phone. When boil water notification door hangers are used, they will be printed in English on one side and Spanish on the other side.

- Forms for filing a complaint of discrimination by OWASA will be available in Spanish as well as English on the OWASA website and from the OWASA Non-Discrimination Coordinator.
- The Clerk to the Board of Directors will maintain a list of contacts that can assist with translation services.

On-demand interpretation will be available for public meetings and one-on-one interactions.

- LEP individuals may request interpretation for public meetings or one-on-one interactions with OWASA staff. Such requests should be made 5 days in advance to ensure adequate time to make arrangements for interpreters.
- Webpages where information about public meetings is posted will include translatable statements announcing the availability of on-demand interpretation for meetings.
- The Clerk to the Board of Directors will maintain a list of contacts who can assist with interpretation services.
- If the language requested is not available through a local language service or trained OWASA staff, OWASA may use a phone-based language service.

Interpretation and translation will be offered free of charge.

- Interpretation and translation services provided by OWASA will be offered at no charge to the customer requesting such services.

Job announcements posted by OWASA will encourage bilingual individuals to apply.

Staff Training

- OWASA will provide training for all staff to familiarize departments with the Language Access Plan policies and procedures. Training may include, but not be limited to, topics such as:
 - A description of language assistance services offered by OWASA.
 - Skill building on how to identify an individual's primary language, and how to respond to assist LEP customers or other callers.

Monitoring and Updating the Language Access Plan

This Plan is designed to be flexible. As such, it is important to consider whether new documents, services, and technologies need to be made available for LEP persons by monitoring changes in demographics and OWASA services. OWASA will review the plan periodically using 5-year American Community Survey estimates. Based on this review, OWASA staff will update the Plan as needed.