

**WASHINGTON COUNTY
COMMUNITY SERVICES**

LIMITED

ENGLISH

PROFICIENCY

PLAN

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WASHINGTON COUNTY COMMUNITY SERVICES LIMITED ENGLISH PROFICIENCY PLAN

I. Purpose and Legal Authority

The following document serves as Washington County Community Services' plan to meet the legal obligation of limited English proficiency requirements in compliance with:

- Title VI of the Civil Rights Act of 1964; 42 U.S.C. § 2000 et seq; 45 CFR §80, Nondiscrimination Under Programs Receiving Federal Financial Assistance Through the U.S. Department of Health and Human Services Effectuation of Title VI of the Civil Rights Act of 1964.
- Office of Civil Rights Policy Guidance, 65 Fed. Reg. 52762 (2000), Department of Health and Human Services, Office of Civil Rights, Policy Guidance on the Prohibition Against National Origin Discrimination As it Affects Persons With Limited English Proficiency (August 30, 2000); Ocr Website: www.hhs.gov/ocr/lep/
- Department of Justice Regulation, 28 CFR § 42.405(d)(1), Department of Justice, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs, Requirements for Translation.
- Bilingual Requirements in the Food Stamp Program, 7 CFR §272.4 U. S. Department of Agriculture, Food And Consumer Service
- Minnesota Data Practices Act requires Minnesota government agencies to maintain the privacy of data that they collect in the course of their business. Information that is collected regarding our customers is considered private data. Except in emergency situations, this data may not be released to anyone other than the customer, our employees, or others authorized by the court or federal law, without the customers' written consent.

II. Policy and Procedures

A. Persons Covered by LEP Plan

Washington County Community Services' Limited English Proficiency (LEP) plan is being updated based on an increasing need for interpreter services in an effort to serve our customers, prospective customers, and their families who do not speak English or who speak limited English.

B. Definitions:

LEP Person A person has Limited English Proficiency (LEP) if he/she is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Human Services staff.

Interpretation is defined as a spoken or visual explanation provided to enable two or more individuals who do not speak the same language to communicate with each other.

Translation is defined as a written version of a document that is provided in a language different than that of the original document.

C. Commitment to Meaningful Access

No person will be denied access to Washington County Community Services program information or programs because he/she does not speak English or communicates in English on a limited basis. Washington County will provide assistance to all customers with LEP in obtaining necessary interpreter services in order for him/her to effectively communicate with staff. Customers will be provided with meaningful access to programs and services in a timely manner and at no cost to the customer.

D. Offering Language Assistance Services

Signs are posted in our reception area and interview rooms and staff have “I Speak” cards to assist our LEP customers. Staff will initiate an offer for language assistance to customers who have difficulty communicating in English, have difficulty reading their spoken language, or when a customer asks for language assistance. Staff must offer, without charge, interpretation and/or translation services to persons with LEP in a language they understand, in a way that preserves confidentiality, in a timely manner.

Staff will appropriately code the following systems to ensure identification of clients potentially requiring LEP services:

Initial Screening Sheet

Financial Intake Screeners will indicate on the screening sheet if interpreter services are required

MAXIS

Workers will appropriately code the following fields on the STAT/MEMB panel for every person entered into the MAXIS system:

Spoken Language (enter appropriate code from F1 Help)
Written Language (enter appropriate code from F1 Help)
Needs Interpreter Y/N

PRISM

Child Support workers will appropriately code the following fields on the demographics [panel (CPDE or NCDE) for each custodial/noncustodial parent entered into the PRISM system:

Primary Language (enter appropriate code from F1 Help)
Interpreter Needed (enter Y/N)

SSIS

Social Service workers will appropriately code language preference on the client entry screen and in case notes.

E. Telephone Interpreter Services

Staff will use the LLE-Link Language Line Services for interpreter assistance when needed. The telephone number is 1-800-234-0780. Washington County Community Services ID number is 61138 and is available in the attachment document (Attachment B). These instructions are also available in each interview room.

Staff will become familiar with how to use this service. Being familiar with the service will help staff act quickly when customers need interpreter assistance. Our reception staff will act as a resource guide for staff. Training will be provided all new staff. Current staff will each be provided printed materials.

For our hearing impaired customers, Minnesota Relay is available by dialing 711 or you may use the TTY phone. If in-person assistance is needed for our hearing impaired clients, fill out a Request for Interpreter Service form (Attachment C) and submit to Chris Thorsheim.

F. In-Person Interpreter Services

We primarily use well recognized interpreter agencies; they have provided documentation that they will provide competent and experienced interpreters. Competency includes:

- Being bilingual and fluent in both English and the language of the LEP customer
- Accuracy and completeness
- Impartiality
- Confidentiality
- Accreditation when appropriate

Interpreters will have training/orientation that includes:

- The skills and ethics of interpreting
- Basic knowledge in both languages of specialized program terms or concepts
- Sensitivity to the customer's culture

For in-person interpreter services, staff will complete a Request for Interpreter Services form (Attachment C) and submit to Chris Thorsheim three (3) working days before the scheduled interview. Chris will contact Betmar Languages at 763-572-9711 or Garden Translations at www.gardentranslation.com for language interpreters and CSD at 651-224-6548 for hearing impaired to schedule all appointments. If the scheduled appointment is cancelled, staff will contact Chris Thorsheim as soon as possible to cancel the scheduled appointment. Bills received should be submitted to Chris Thorsheim for payment.

G. Procedure for Using and/or Distributing Translated Forms

Washington County Community Services has access to a number of forms which are available in languages other than English. Staff also has access to forms on the MAXIS system and can retrieve them. Forms can also be retrieved at www.dhs.state.mn.us/Forms.

Regularly used forms will be made available in translated form in the supply room in the Community Services office.

When documents from customers need to be translated, they should be given to our LEP contact person, Chris Thorsheim, for translation. Attach a Request for Form Translation (Attachment F). They will be sent to our translation service and returned to the worker as soon as possible.

H. Services to Illiterate

Staff will assess customer's literacy level and determine interpreter needs. Staff should not send forms to illiterate customers. Staff shall use an interpreter or Language Line services (Attachment B) to complete required forms verbally. Staff should further inform the client to contact them for interpreter services when they receive a DHS or agency form.

Illiterate Non-English Speaking Customers

1. Staff must assist LEP customers who do not read their primary language to the same extent that they would assist an English speaker who does not read English.

English Speaking Customers Who Are Illiterate

2. Staff will encourage and assist customers in identifying a responsible person to assist them. Economic Support customers may designate an "authorized representative" who can act on their behalf. Agency staff may assist customers in completing necessary paper work only in the event that the customer cannot obtain assistance from another responsible person. Staff will use a red pen and indicate on the form their name and date and that they completed the form at the customer's request because no other responsible person was available.

I. Bilingual Staff

Bilingual staff may be used for short questions and answers with permission from their supervisor. Washington County's policy is to randomly assign cases to available bilingual staff. Caseloads are not specialized by language and we do not hire bilingual staff to serve as interpreters. Through our contracted services we are able to provide efficient and consistent interpreter services to meet our customers' needs. A list of bilingual staff is attached. (Attachment D).

J. Using Adult Family and/or Friends as Interpreters

Staff should never require, suggest, request, or encourage a customer with LEP to use family or friends as interpreters. Use of family or friends could result in a breach of confidentiality or reluctance on the part of the customer to reveal personal information that may be critical to their situation. Family or friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation, or have little familiarity with specialized program terminology. If the LEP person declines this service, the worker will document in case notes that services were offered and declined and complete LEP record (Attachment A).

K. Using Minor Children as an Interpreter

Minor children should never be used as an interpreter.

L. When A Customer Declines Services

When a customer declines services, note this in the case notes and by completing the LEP Record (Attachment A). Send a copy of the LEP Record to Chris Thorsheim.

M. Competency Standards for Interpreters

We primarily use well recognized interpreter agencies; they have provided documentation that they will provide competent and experienced interpreters. Competency includes:

- Being bilingual and fluent in both English and the language of the LEP client
- Accuracy and completeness
- Impartiality
- Confidentiality
- Accreditation when appropriate

Interpreters will have training/orientation that includes:

- The skills and ethics of interpreting
- Basic knowledge in both languages of specialized program terms or concepts
- Sensitivity to the customer's culture

N. Notice of Rights to Language Assistance

Washington County Community Services staff will inform all customers with LEP of the public's right to free interpreter services and that these services must be provided in a timely manner during normal business hours.

Washington County Community Services staff will use I Speak cards to help customers with LEP to be able to identify their language needs for staff. Posters will also be used in the agency to inform customers that language interpreters are available at no cost to them.

III. LEP Training for Washington County Community Services Staff

Washington County Community Services will distribute the LEP plan to all staff once approved by DHS so they can learn the policies and procedures required to make language assistance available to our customers with LEP. Included in this plan are Guidelines for Working with an Interpreter (Attachment E). New employees will have the LEP plan incorporated into their New Employee Orientation.

LEP training will include legal obligation to provide language assistance to customers with LEP, policies and procedures to access language assistance services and how to properly document information about the customer's language needs in the case file. All staff with ongoing customer contact are required to receive LEP updates annually. The LEP Training session will be taped for review.

IV. Monitoring of the LEP Plan

An evaluation will be conducted annually to determine the overall effectiveness of the plan. This will be accomplished by staff inputting data into a specialized computer program. This evaluation will assess the number of persons with LEP in the service delivery area. It will assess the current language needs of these customers to determine if these needs are being met. It will assess if our staff understand the LEP policies and procedures, know how to carry them out, and whether language assistance resources are still current and accessible.

A. LEP Plan Posted for Public Review

The Washington County Community Services LEP plan will be posted for public review in the reception area. The LEP plan will be available in English, but interpreters will be available to translate the plan for those who do not speak English who wish to read it.

B. Distribution of LEP Plan

Immediately upon approval, the Washington County Community Services LEP plan will be distributed to all staff.

C. Responsible Authority/Complaint Process - Contact Person

Each division will be responsible for implementing this LEP plan in its area. The person responsible to provide technical assistance, respond to inquiries and complaints from the public, and monitoring and updating this plan will be Chris Thorsheim at 651-430-6477.

LEP RECORD

Customer Name: _____ Case Number: _____

Language preference: _____ Interpreter: ____ yes ____ no

Hearing Impaired _____ Interpreter: ____ yes ____ no

Translated Forms: ____ yes ____ no

Customer declined interpreter services: ____ yes ____ no

Customer Signature _____ Date: _____

Notes:

LEP RECORD

Customer Name: _____ Case Number: _____

Language preference: _____ Interpreter: ____ yes ____ no

Hearing Impaired: _____ Interpreter: ____ yes ____ no

Translated Forms: ____ yes ____ no

Customer declined interpreter services: ____ yes ____ no

Customer Signature _____ Date: _____

Notes:

LLE-LINK INSTRUCTIONS

(LANGUAGE LINE)

1. Dial 1-800-234-0780
2. Enter access code “61138” on the telephone keypad.
3. Enter your four-digit employee number.
4. Listen to the menu and select the desired language code.
5. Introduce yourself to the interpreter and briefly explain the situation. Ask the interpreter to wait while you connect with your client. You will be placing the 3-way call.
6. Press the “Trans/Conf” key on your telephone. Dial your customer. When they have answered, press the “Trans/Conf” key again. You will now have a 3 way call.
7. Instruct the interpreter to proceed.

REQUEST FOR INTERPRETER SERVICE

To request an interpreter, complete the items listed below. Submit completed form to Chris Thorsheim. Forms must be submitted 3 working days prior to scheduled appointment time. Submit all bills received to Chris Thorsheim for payment.

DATE REQUESTED _____

CUSTOMER NAME _____ CLIENT NUMBER _____

CLIENT PHONE NUMBER _____

LANGUAGE REQUESTED _____ HEARING IMPAIRED _____

WORKER NAME _____

TIME/DATE/LENGTH OF APPOINTMENT _____

REASON INTERPRETER NEEDED _____

LOCATION OF INTERVIEW _____

TYPE OF INTERVIEW (CIRCLE ALL THAT APPLY)

ECONOMIC SUPPORT:
MFIP
MA
CHILD SUPPORT
WORKFORCE CENTER

SOCIAL SERVICES:
CHILD PROTECTION
MENTAL HEALTH
ADULT SERVICES
DEVELOPMENTAL DISABILITIES

CANCELLATION OF INTEPRETER

Cancellation of an interpreter must be submitted to Chris Thorsheim as soon as possible prior to scheduled appointment. Submit all bills received to Chris Thorsheim for payment.

CUSTOMER NAME _____ TIME/DATE OF APPOINTMENT _____

WORKER NAME _____ LOCATION OF INTERVIEW _____

REASON FOR CANCELLATION _____

DATE SUB MITTED _____

Guidelines for Working with an Interpreter

General Guidelines:

- Be sure to speak directly to your customer, not the interpreter
- Use words, not gestures, to convey your meaning
- Speak in an audible tone and speak slowly
- Explain jargon and technical terms to the interpreter when necessary
- Use simple vocabulary
- Speak in short sentences and pause to allow the interpreter to speak
- Ask one question at a time
- Control the environment

To assist the customer, if appropriate:

- Ask your customer if they feel they understand your question and if they need to ask any questions themselves.
- Ask your customer if there is something in their culture that makes this situation different, hard to understand, difficult or embarrassing
- Ask your customer if they need anything re-explained and if your message is not understood, be prepared to say it differently.
- If you think that your message may not be fully understood by your customer, double check by saying “Tell me what you understand.”

To assist the interpreter:

- Allow the interpreter to stop you and seek clarification when necessary.
- Allow the interpreter to take notes if things get complicated.
- Allow the interpreter to clarify cultural issues if appropriate.

REQUEST FOR FORM TRANSLATION

(Worker Completed)

Date: _____ **Worker:** _____

Form to be Translated _____

Submit to Chris Thorsheim for translation

(LEP contact completes)

Date Form Submitted for Translation: _____

Date Form Returned for Translation: _____

Signed: _____

Attachment G

LEP Checklist

- _____ Ask customer his primary language preference and note on LEP Record in file and on MAXIS, PRISM, MMIS, etc. (Use "I Speak" cards).
- _____ Ask customer if he wants interpreter services and note on LEP Record in file and on MAXIS, PRISM, MMIS, etc. (Advise customer that this is free of charge.)
- _____ Note: If customer declines interpreter service, make note of this on the LEP Record in the file.
- _____ Ask customer if he wants to use translated forms and note on LEP Record in file.
- _____ If needed, obtain written release of information from customer to allow communication with interpreter.
- _____ During appointment use Helpful Hints contained in Attachment E of plan.
- _____ Bills should be submitted to Chris Thorsheim for payment.