

(Agency name) Language access plan

Effective Dates: January 2019-December 2019 (for example)

Section 1: Overview and context

A. Connection to mission

Insert your mission here.

(Agency Name) recognizes that providing meaningful language access is a critical function of ensuring safety and security for all survivors of sexual and domestic violence.

B. Language access needs:

(Agency Name) has identified that _____ are the languages spoken in our community. The analysis of the general population and population served by our agency revealed that we need to build immediate capacity to provide meaningful access in each of these languages.

Additional strategies for building relationships with and increasing our capacity to serve _____ speaking community members will be outlined in this plan.

Section 2: Policies

A. General policy statement:

Sample language 1

(Agency name) will never turn anyone away because they do not speak English. Furthermore, (Agency Name) will work to improve our capacity to provide meaningful access to individuals with limited English proficiency every year.

Sample language 2

(Agency Name) primary focus is to provide support and safety to victims of domestic violence and sexual assault through direct services. Therefore, (Agency Name) will develop and secure sustainable language resources as needed in both oral and written form so that no victim will be denied access to information or services.¹

Sample language 3

It is the policy of this agency to provide timely meaningful access for persons with LEP to all agency programs and activities. All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services to them.

B. Purpose and authority:

1. The purpose of this plan is to ensure that (agency name) provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. (Agency name) is committed to this plan as the appropriate response to meeting survivors' needs. This plan is consistent with federal requirements. All agencies that receive federal financial assistance from the U.S. Department of Health and Human Services (HHS) must

¹ Adapted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency (LEP) Plan, <https://www.kcsdv.org/wp-content/uploads/2018/03/model-LEP-plan.pdf>

take adequate steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow them meaningful access to services, free of charge.²

2. The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for agency personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to the success of our mission to [insert].

C. Language access liaison

The (Position Title) will lead the organization's efforts to implement this policy. [Describe the duties of the Language Access Liaison]

Section 3: Definitions

Language access: the rights of individuals with Limited English Proficiency (LEP) to receive meaningful access to federally funded state and Federal programs.

Limited English Proficient (LEP): refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English.

Interpretation: The process of rendering a spoken or signed communication from one language into another language accurately and completely (e.g. interpreting during an interview).

Translation: involves conveying information in writing from one language to another (e.g. translating documents).

Interpreter: individual with training and experience with interpretation, who is a neutral third party, is experienced in interpretation techniques, specialized content areas and technical terminology and adheres to a code of ethics and confidentiality.

Vital documents or information are those that are critical for accessing federally funded services or benefits or are documents required by law. For the purposes of (Agency Name)'s services to survivors and other constituents the following are deemed vital documents (Examples may include):

- Any and all sexual and domestic violence or related brochures generated by (Agency Name) for use by survivors.
- Community education materials generated by (Agency Name) for distribution
- Crisis information or referral information to area resources
- Intake forms, confidentiality waivers, etc. ³

² Excerpted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency Plan. Available at <https://www.kcsdv.org/wp-content/uploads/2018/03/model-LEP-plan.pdf>

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Section 4: Procedures

In this section, you should include guidelines for identifying primary language, as well as procedures for providing meaningful language access through in-language services; translation of written materials; in-person interpretation or telephonic interpretation. Make sure your procedures are aligned with best practices for meaningful language access. Include procedures for different points of contact and different service scenarios. You may want to use this [point of contact worksheet](#) as a tool to develop these procedures (see example below).

This is also a good Section to specify restrictions and prohibitions of using non-qualified interpreters, family members, friends and children to interpret.

Point of contact	Expectations of staff	Tools and resources
Crisis Line	Identify language spoken. Connect with bilingual staff, interpreter, etc.	Language Line, Bilingual Advocates, etc.
One-on-one Participant Meetings (Intake, Case Planning, etc.)	Ensure that an interpreter is available. Follow best practices for ensuring safety for participant by securing the name of the interpreter in advance, requiring an interpreter confidentiality agreement, etc.	In-Person Interpreting Agency Interpreter Confidentiality Agreement
Ongoing Shelter Services	Notify participant of the available of language services on an ongoing basis, immediately provide access to the language line when requested.	Language Line Language-specific shelter tour video
Community-Based Services	Meet with other agencies and provide information about LEP plan and resources so that they may assist in informing LEP individuals of language assistance services available.	Flyers, I Speak Cards, brochures
Providing Referrals	Call the referral source and identify a point of contact with adequate language capacity. Connect the participant with the point of contact. Request and review the LEP Plan for the referral source (courts, medical offices, other DV services, etc.).	In-Person Interpreting Agency Language Line Language access cards

Community Events	Identify language spoken. Connect with language line to assess safety concerns and requests.	I Speak Cards Language line
Support Groups	Arrange for an interpreter to be present at every support group during the survivor's stay.	In-Person Interpreting Agency
Written materials	Vital documents are available in Spanish, Arabic and Mandarin. Vital documents are to be reviewed with the support of an interpreter during intake.	Additional translations can be arranged through selected translation agency.

A. Staff compliance

Sample language

(Agency name) staff will initiate an offer for language assistance to constituents who have difficulty communicating in English.⁴

All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services for all services offered.⁵

B. Identifying primary language

Sample language

All (Agency Name) intake staff will have “I speak” cards in the languages most prevalent in our community.⁶ Before contacting a qualified interpreter or a bilingual staff member, intake staff should show the “I speak” card to the person with LEP so that they can identify their primary language.

C. Procedures for meaningful language access provision

Sample language

(AGENCY NAME) is committed to assuring clear, confidential, two-way communications with all survivors. As part of this commitment (AGENCY NAME) will provide trained and competent interpreters, whenever oral communication is needed. This service will be provided at no charge to the survivor. (AGENCY NAME)'s preferred means of achieving this goal will be to employ case handlers and support staff who are fluent in the major languages spoken by survivors in our community.

⁴ Adapted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency (LEP) Plan, <https://www.kcsdv.org/wp-content/uploads/2018/03/model-LEP-plan.pdf>

⁵ Adapted from the Legal Assistance of Western Missouri plan available at A. http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

⁶ Adapted from the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

When (AGENCY NAME) staff members who are working directly with a survivor are not fluent in the survivor's language, (AGENCY NAME) will use the services of a local interpreter service, which uses trained and tested interpreters. To the extent possible, the interpretation will be conducted in person but, if necessary, it may be conducted by phone. If no local interpreter service is available, (AGENCY NAME) will use Language Line or a similar over-the-phone interpreter service.⁷

D. Children as interpreters policy

- (Agency Name) will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.
- Child interpreters prohibited. The use of minor children or other survivors to interpret is prohibited.⁸

Section 5: Notification of language assistance services

Sample language:

- Posters notifying survivors with LEP of their language service rights will be developed and displayed in areas where intakes are conducted. These posters will contain a simple message - such as 'Free Interpreter services are available. Please ask for assistance.' And will be in English as well as the principle languages spoken in the service area. Flyers will also be developed and made available throughout the program and community. Staff will also have access to the (Agency Name) Language Access plan and will have 'I-Speak Cards'. These are laminated business-sized cards that say in both English and the principal languages 'I need a (appropriate language) interpreter.'⁹
- In all its intake areas and on its website, (Agency Name) will post and maintain clear and readable signs in the languages most prevalent in our community notifying survivors that free translation and interpretation services are available to them while using the organization's services.

Section 6: Monitoring and staff responsible for monitoring

Plan to monitor effectiveness:

1. (Agency name) will conduct an annual evaluation of its LEP plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving survivors with LEP. The appointed staff will lead the evaluation with the assistance of other staff. The evaluation will include the following:
 - Assessment of the number of persons with LEP in our services area

⁷ Please note that this is one bullet point of a list of 8 points for oral interpretation. There are an additional 5 points in their plan for written translation. See the full text within the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

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- Assessment of the number and types of language requests during the past year: how many were met and with which strategies, how many were not met and why.
 - Assessment of whether survivors with LEP are satisfied with existing language assistance services and that the services are meeting their needs
 - Assessment of whether staff members understand the LEP plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and still accessible¹⁰
2. (Agency Name) intake personnel will record each person's language of choice on the intake sheet. If the individual has limited English proficiency, the person's language of choice will be clearly marked on the file. (Agency Name)'s case management system will track the number of individuals that (Agency name) accepts and rejects by the person's language of choice. This information, broken down by office and team will be considered as part of the annual LEP Policy review.¹¹
 3. (Agency Name) will monitor changing population levels and the language needs of individuals with LEP in the region. An annual review of this language access plan will coincide with the annual evaluation of the program. Evaluation results and recommended changes will be shared with (Agency Name)'s (Board of Directors of Language Access Committee, for example). The Language Access Coordinator will also keep a record of any language access services provided and will make this information available during the annual review process. In connection with updates to this Language Access Plan, (Agency Name) may use some of the following tools to conduct further assessment:
 - Conduct surveys or focus groups
 - Develop an evaluation process to assess LEP service provision
 - Establish a tracking system to collect primary-language data for individuals that participate in programs and activities¹²

Section 7: Community outreach and collaboration

1. (Agency Name) will identify the primary sources through which survivors with LEP are referred to our services, and culturally-based organizations that serve individuals with LEP in our community. (Agency Name) will work to develop collaborative relationships with these organizations to ensure more seamless access to services, accountability to our own language access policies, and greater access to survivors with LEP.
2. (Agency Name) will share its LEP Policy and the documents and knowledge it develops regarding LEP resources with the other services organizations in our area, namely (List Key Partners Here), and any other not-for-profit organization that requests the information.¹³

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¹¹ Adapted from the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

¹² Adapted from the MARC plan available at <http://marc.org/Transportation/Equity-Considerations/pdf/LimitedEnglishProficiencyPlan.aspx>

¹³ Adapted from the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

Section 8: Training

Staff training

1. (Agency name) will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures. One staff member may be appointed to monitor implementation of the plan and conduct staff training as needed.
 - All staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.
 - LEP plan information will be incorporated into the employee handbook.
 - LEP training will include information on the following topics:
 - › Legal obligation to provide language assistance
 - › LEP plan and procedures
 - › Responding to LEP individuals
 - › Obtaining interpreters (in-person and over-the-phone)
 - › Using and working with interpreters (in-person and over-the-phone)
 - › Translating procedures
 - › Documenting language requests¹⁴
2. (Agency Name) will circulate this policy to all staff within 10 days after its adoption. Every two years, (Agency Name) will circulate the revised policy to all staff after its adoption. Within nine months of the adoption of this policy, (Agency Name) will provide cultural responsiveness training, including training regarding this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with survivors. All new staff members will receive cultural competency training within six months of the beginning of their employment with (Agency Name). After their initial training, all staff members will receive refresher training in cultural responsiveness and language access every three years.¹⁵
3. In order to establish meaningful access to information and services for survivors with LEP, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained on (Agency Name)'s LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with survivors with LEP. Management staff will be included in this training, even if they do not interact regularly with survivors with LEP, to ensure that they fully understand the plan, so they can reinforce its importance and ensure its implementation by staff.¹⁶

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¹⁶ Adapted from the MARC plan available at <http://marc.org/Transportation/Equity-Considerations/pdf/LimitedEnglishProficiencyPlan.aspx>

Appendix

A. Implementation calendar

Language access measure	Goal	Timeline	Person responsible
Train all staff and volunteers on connecting to Language Line services.	95% staff will be able to successfully implement language access plan	by March 31	Management Team and Individual Supervisors
Add “Preferred Language” Categories to Intake Form to improve screening and evaluation	Intake form will include new intake categories for “Preferred Language” Data input begins First quarter analysis of language access needs completed with the goal of 80% completion of the new category on the intake	by March 31 April 1st by July 15	Advocacy Manager

B. Fund development needs

Immediate funding needs include: [EXAMPLES: developing a line item in the budget for interpretation and translation. Printing costs for “I Speak” posters will be paid from grant or unrestricted revenue.]

Long-term funding needs include: [EXAMPLE: hiring plan for bilingual advocates, development of multi-lingual video tour of shelter and review of shelter services and guidelines...]

C. Additional language access policies

Bilingual staff policy

- (Agency Name) prefers hiring bilingual/bicultural staff members whenever possible to work directly with individuals with limited English proficiency. Bilingual/bicultural staff qualify for a salary differential based on language proficiency, cultural knowledge, and ability to effectively support individuals with limited English proficiency. Additionally,

bilingual staff are not and should not be used as interpreters for work inside the organization or for other organizations.

- (Agency Name) shall consider second language proficiency, in a language commonly spoken by (Agency Name) clients or potential clients, as a preferred quality when hiring new staff. (Agency Name)'s employee recruiting materials will clearly state that second language proficiency will be viewed favorably in (Agency Name)'s hiring decisions. (Agency Name) will send notice of all job openings to diverse community-based organizations in our area.