



## **Language Access Plan (LAP)**

### **Introduction and Purpose**

The Anne Arundel County Partnership for Children, Youth and Families (the Partnership) is committed to complying with all civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI), which requires us to make sure individuals with limited English proficiency (LEP) have meaningful access to our programs and services. The term LEP doesn't refer to people who are bilingual, but rather individuals who have a limited ability to read, write, or understand English well or at all.

The Partnership is the Local Management Board for Anne Arundel County, Maryland; one of 24 Local Management Board's across the state. One of the Partnership's statutory responsibilities is to prepare a comprehensive Community Needs Assessment for our county that utilizes a mix of quantitative and qualitative data to understand community demographics, identify community needs, map existing resources, analyze gaps, and make recommendations for service providers in our community to ensure that the needs of children and families in our community are met.

In order to design a comprehensive LEP, the Partnership's analysis balanced the data collected through our needs assessment process with the following elements:

- 1) The number or proportion of LEP persons in Anne Arundel County, and what languages are most commonly spoken in our community;
- 2) The nature and importance of the program, activity or service provided and the potential frequency with which LEP persons come into contact with these programs/activities;
- 3) The resources available and costs to the organization. Please note that to the extent possible, we have tried to maximize our capacity by leveraging existing partnerships and relationships with other child-serving agencies and community organizations.

### **Anne Arundel County Demographics for LEP Populations**

The Partnership's mission is to:

- assess community human services needs and identify gaps in services
- convene a neutral group of diverse stakeholders to build partnerships and develop solutions
- fund services for children and families by leveraging State funding and increasing local resources, and
- advance the Governor's priorities of reducing the impact of parental incarceration on children, families and communities; improving outcomes for disconnected youth; reducing childhood hunger; and reducing youth homelessness.

Much of the Partnership's work is collaborative in nature as is dictated by the state and county statutes that established our organization. While only a very small percentage of our efforts are providing direct service to community members and residents, the core of the Partnership's model for service delivery is to meet people where they are. Sometimes this means developing placed-based solutions and services, or using a trauma informed approach, or ensuring residents can access our programs and services in their native language.

Based on the most recent data available through the U.S. Census Bureau's American Community Survey (2015), there are 509,623 residents over the age of 5 in our county. Of those 455,763 – or 89.43% speak only English in their home. The remaining 53,860 individuals speak one of over 50 other languages, the most predominant of which is Spanish (5.08%). The remaining languages tallied in the ACS 2015 county level data each represent less than 1% of the population. As the number of Spanish-speaking residents in our County continues to grow at an exponential rate, ensuring that materials and services are offered in Spanish is paramount to our ability to serve and meet community needs.

An argument can be made that the geographic area we serve is quite extensive and the LEP populations to be served by our site are quite numerous. Rather we determined the LEP populations to be served are based on the following: 1) census data; 2) a review of translator services requested/provided by direct service programs in the last five years; and 3) review of needs assessment data (specifically the gap analysis regarding barriers to service delivery. We utilized this data to determine which LEP groups we may not be adequately marketing to, and what documents we need to translate into which languages.

Aside from English, the primary language spoken by LEP populations in our community is Spanish at just over 5% of the population. Korean is the next highest at only 0.65%. As each of the other languages spoken in the county represent less 0.5% of the population, translation services will be made available on an as-needed basis through the Language Line. A review of data for our direct services shows that the demographics of those served match roughly the county's census data. Approximately 94% speak English fluently, with just over 5% speaking Spanish as their primary language. Only 4 families in the last five years have spoken other languages (less than 1%).

The Partnership recognizes that direct service staff has, and will continue to have, significant contact with LEP persons who speak and read Spanish and have ensured appropriate documentation available in their native language as follows:

- 1) Advertisements of service (including brochures, flyers, posters, etc.);
- 2) Standard intake or referral form;
- 3) Agreements for service and related release forms;
- 4) Action plans, service delivery plans, and other related service correspondence.

We are looking to expand our outreach into predominately Spanish-speaking communities through our partnership with Centro de Ayuda and Hispanic Ministries in our county.

### **Language Assistance Measures**

The type of language assistance necessary to provide meaningful access will vary depending on the type of communication staff is having with the LEP person (e.g. phone, in person or written communication) and in some circumstances more than one method will work. Regardless of how the language assistance is provided, we recognize the importance of providing such services in a timely manner and in an appropriate place. Failure to do so may effectively delay or deny LEP participants access to our services. We understand that the extent of our obligation to provide both oral and written translation is dependent on the analysis we conducted at this site.

We have chosen to follow the federal guidelines provided by the Substance Abuse and Mental Health Services Administration (SAMHSA), to assist us in determining when to provide translation of vital documents. The guidelines for written translation of vital documents is based on the number and percentages of the market area-eligible population or current beneficiaries and applicants that are LEP. According to this guidance:

- Written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 individuals, whichever is less, of the population of persons eligible to be served or likely to be encountered; or
- If 5% is less than 50 people, provide written notice in the primary language of the group of their right to receive competent oral interpretation of the materials, free of cost

As such, because our LEP residents who speak Spanish comprise more than 5% of our resident population, we will make every effort to translate all vital written documents into Spanish. No other language spoken in our community meets this threshold as of this writing. Therefore, we will not translate vital documents into any other languages, but rather provide a translated written notice of the person's right to an oral interpretation.

To this same end, our marketing efforts need to be fully accessible to all Spanish speaking individuals in our county. This includes, but isn't limited to, brochures, advertisements, choice of newspapers and radio stations. We will include an update in our 2019 Community Plan to reflect these updates to our LEP plan.

This guidance isn't applicable to oral communication so the Partnership has an obligation to provide oral language assistance regardless of the number or percentage of persons who comprise a specific language group at a site or in the service area. The degree to which we will provide oral language assistance will depend on the nature and importance of the activity.

### I Speak Cards

In order to be able to provide language assistance we need to identify who needs the assistance. All applicants (regardless of race or national origin) will be asked if they need language

assistance. This site will use the language identification cards to invite LEP persons to identify their own language needs.

### Oral Language Services

For those individuals and families that self-refer to our services, or who access our programs through other means, oral translation services are provided by the Language Line, which provides immediate translation services in over 200 languages.

The Partnership's goal is to provide meaningful access to our programs for individuals with limited English proficiency in a timely manner. When available, we will use competent bilingual staff to act as interpreters for individuals and families served. In addition, all staff have been provided with a list of **outside resources** that include community volunteers and organizations that specifically serve the Hispanic/Latino community (ex. Centro de Ayuda) who are willing to provide oral language assistance.

Under most circumstances, interpreters aren't required to provide a formal certification as an interpreter. However, they must still do the following:

- Be proficient in and able to communicate information accurately in both English and the other applicable language;
- Have a relationship appropriate to the circumstance and that does not conflict with the needs of the individual or family being served;
- Understand and ensure confidentiality;
- Maintain impartiality and act solely in the role as an interpreter; and
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

Where individual rights depend on precise, complete and accurate interpretation, we will try to use certified interpreters or those otherwise deemed qualified by a state or federal court.

We also recognize that it may be necessary to utilize team interpreters to ensure accuracy and to provide an opportunity for breaks.

Regardless of who is used as an interpreter, staff will adhere to the following guidelines when using an interpreter:

- Explain to the interpreter the purpose of the communication and provide a description of the information to be conveyed;
- Provide brief explanations of technical terms of art that may come up during the communication, such as eligibility, income limits, etc.
- Avoid using industry specific acronyms not generally known or understood by the general population.;
- Speak in short sentences;
- Express one idea at a time and allow the information to be interpreted prior to continuing;

- Check in with the interpreter to make sure he/she is understanding what you're saying because if he/she doesn't then how he/she translates the information may be confusing to the LEP applicant/resident;
- Avoid using double negatives;
- Enunciate words;
- Don't use contractions;
- Talk to the applicant and not to the interpreter. In other words, face the applicant/resident and look at him/her and not the interpreter;
- Be patient;
- Thank the interpreter.

### Informal Interpreters

Applicants and Residents who have limited English proficiency often choose to bring an informal interpreter with them to assist in communication, including but not limited to the LEP client's family members, friends, legal guardians, service representatives or personal advocates. In such instances, site staff must remember the following:

- LEP persons who bring an informal interpreter with them must be reminded that The Partnership is willing to pay for free language interpretation. If the LEP person prefers the informal interpreter, he/she will be permitted to do so at his/her own expense. Also, they must sign an acknowledgement that the Partnership has offered free interpreter services and that he/she has elected not to have a formal interpreter present;
- Informal interpreters may not be appropriate, depending on the circumstances and subject matter. Simply put, not all informal interpreters are competent to provide quality and accurate interpretations. As a result, such language assistance may not result in an LEP person obtaining meaningful access to our programs or services. If a LEP client wants an informal interpreter, the Partnership may choose to also have a formal interpreter to ensure accurate translation of complex, legal or policy-specific material;
- In emergency situations that are not reasonably foreseeable, the Partnership may need to temporarily rely on informal interpreters. Reliance on children is especially discouraged unless there is an extreme emergency and no competent interpreters are available.

### Telephone Interpreter Service Line

All site personnel have been provided information on how to access and utilize Language Line Services, which can provide immediate interpreter services in over 200 different languages. This can be very helpful when an LEP applicant calls or comes in and no other interpreter is available to assist.

### Written Translation Services

As previously stated, the Partnership will provide written translation of vital documents into Spanish, the most frequently encountered LEP group in our community that meets the federal

guidelines articulated by SAMHSA. In addition, we will conduct our marketing (including using translated materials) in a manner that addresses the Spanish-speaking population of our community as well.

Vital Documents Include The Following:

- Notices of free language assistance for persons with LEP;
- Consent, release and compliance forms;
- Applications, intake and/or referral forms;
- Notice of Non-Discrimination and Reasonable Accommodation;
- Grievance policy;
- Any forms with the potential for important consequences; and
- Outreach materials.

### Accuracy of Translation

The Partnership will make every effort to use competent and accurate translators. We recognize that this is particularly important for documents with legal or other information where accuracy has important consequences. Many of the considerations discussed regarding interpreters apply to translators. As stated earlier, the skill of translating is very different from the skill of interpreting, and competency in one doesn't mean competency in the other. We will employ certified translation services (ex. Rey's Language Services) to translate all vital documents from English into Spanish and will verify the translation with an external partner fluent in Spanish to ensure accuracy.

When translating documents we will make every effort to do so at the appropriate reading level for our target audience. We also recognize that there isn't always an appropriate direct translation of an English term. We will work with our translators to provide an appropriate alternative and try to develop and maintain a glossary of commonly used terms that can be used again, when appropriate. We may also provide our translators with examples of previous translations of similar material (either ours or others) to assist in translation.

Staff has also been instructed that LEP persons may not be able to read their native language, and to be ready to provide oral interpretation of written documents.

### **Staff Training Regarding LEP Policies and Procedures**

All current Partnership staff is trained on their obligation to provide meaningful access to information and services for LEP persons. Likewise, training on this topic is part of our company's orientation for new Employees. The training seeks to make all employees aware of the following:

- A) Background of the LEP program;
- B) Our organization's obligation to provide meaningful access to individuals with LEP;
- C) LEP policies and procedures; and

- D) Protocol in responding to LEP callers, written communications from LEP persons and in-person contact with LEP persons.

In addition, staff persons who have contact with our applicants and residents are trained to work effectively with in-person and telephone interpreters, and the various modes of interpretation (simultaneous interpretation, consecutive interpretation and sight interpretation). The greater the contact, the more in-depth training they receive. In addition, managers, assistant managers, regional managers and compliance personnel must be fully aware of and understand their plan so they can reinforce its importance and ensure proper implementation. Finally, all staff are trained on how to capture relevant LEP data on individuals and families served to ensure proper tracking and reporting on these services.

### **Providing Notice of Free Language Services to Persons with LEP**

We recognize that it is important to let our community know that we will provide free language assistance. We have developed a notice in different languages that states this and how to obtain language assistance. We will notify persons through the following methods:

- A) Post signs in common areas, offices and anywhere applications or referrals are taken in an accessible manner;
- B) Place this statement in marketing materials, if space is limited we will put it in the most common language(s);
- C) Provide notification with our application, intake and/or referral materials;
- D) Provide notices on non-English-language radio and television;
- E) Presentations and/or notices at schools and grassroots and faith-based organizations.

### **Continuous Oversight of the LAP – Monitoring and Updates**

The Partnership will monitor and update this LAP on an ongoing basis.

- Staff must track the language assistance requested and what was provided - both the type of assistance requested as well as in what language. The purpose of this is to determine both need and how well the Partnership is satisfying these needs. This information will be captured inside our ETO database.
- The Partnership will annually review the demographics of our participants to make sure their language assistance needs are adequately met.
- If new demographic data is released by the federal or state government, the Partnership will review the data and implement accordingly (i.e., adjust marketing efforts and update this plan).

### **Grievance Policy**

Please see the Partnership's "Grievance Policy" (updated 8/25/18) for information on how an individual of LEP may address any discrimination faced in the course of applying for, or

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receiving services from, the Partnership's programs. This policy is considered a vital document and is available in written form in both English and Spanish.

A handwritten signature in black ink, appearing to read "Pamela M. Brown". The signature is fluid and cursive, with a period at the end.

Pamela M. Brown, Ph.D.  
Executive Director

Date: 9/4/2018