

## **LANGUAGE ACCESS**

We value the diversity of our clients and foster an inclusive environment where we respect individual differences, including language preferences. Mayor's Office for People with Disabilities is committed to ensuring that the services we provide are accessible to all of the populations we serve, including those persons who are limited in their ability to communicate in the English Language. Limited English Proficient persons (LEP) are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. Please note that this Language Access Policy is specific to MOPD programs and services only. No other translation or interpretation of documents not pertaining to disability services can be provided.

As service providers and advocates of persons with disabilities, we have an obligation to effectively communicate with our clients and ensure that they have meaningful access to City services, resources and programs. We continually work to improve service delivery options available to Limited English Proficiency (LEP) individuals that allow them to communicate effectively with us in-person, over the phone, in writing, or through the Internet. MOPD staff shall serve LEP individuals in the same manner as English speaking clients, to the extent possible. LEP clients should not experience any unreasonable delay in services because of their language needs.

Each MOPD office should have posted, in a visible place at or near the reception area, an "Interpretation Services Available" poster. The person working at the front desk should also have a copy of the "Language Identification Card" sheet available to show LEP clients when the staff person cannot identify the person's primary language. Copies of this sheet can also be printed from the MOPD shared portion of the "S" drive in the LEP folder.

An LEP person may also need program information translated into his or her primary language. MOPD will translate, upon funding from the Mayor's Office of New Americans, the most frequently used program flyers into the top five languages spoken in Chicago, including Spanish, Polish, Chinese (Simplified), Hindi, and Arabic. These flyers will also be available in braille and large print in limited quantities. If an LEP person requires written program material in a language other than the top five languages or more information on a specific program, it will be translated and provided on request within a reasonable amount of time. This includes material in braille and large print in limited quantities in languages other than English. Our LEP Plan, is available online at [www.cityofchicago.org/disabilities](http://www.cityofchicago.org/disabilities), and conveys our policy principles and provides our LEP service delivery guidelines to the public and our employees. We will provide a copy of the Plan to any person who requests one.

### **There are five (5) areas that comprise MOPD's LEP PLAN:**

1. *Identifying LEP individuals who need language assistance*
  - a. Per Chicago's Language Access Advisory Committee recommendations, departments should provide services in any non-English language spoken by a limited or no-English proficient population that constitutes 5% or 10,000 individuals, whichever is less, in Chicago, as those languages are determined on a variety of relevant sources, including United States Census data and community feedback. Currently in Chicago, this would mean that departments would provide services in the following languages: Spanish, Chinese (Simplified), Hindi, Polish, and Arabic. In

addition to these languages, American Sign Language (ASL) and Minimal Language Skills (MLS) shall be provided.

## *2. Identifying and Implementing Language assistance measures*

- a. Procedures are identified in the following pages of this document.

## *3. Training Staff*

- a. Our staff is trained to know how to identify LEP customers and the procedures for accessing our language assistance services. We make training available for new and existing staff to ensure effective implementation of our policies and procedures.
- b. A train-the-trainer model of initial LEP training will occur for all staff before this new policy is implemented. This training includes a review of the Language Access Policy and Procedures; training on utilizing LanguageLine Solutions for translation of written materials, and utilizing currently used interpreter services including DCI for sign language interpreters. Subsequent training of new or existing staff will be the responsibility of the manager/supervisor.
- c. We will continue to provide training on LEP services, cultural diversity, and customer service to help staff deliver effective and efficient language access services to our LEP clients. We deliver this training via a blended approach, using a variety of tools, such as in-person classroom style training, video training, and on-line webinars designed to enhance skills, including the language skills of our employees.
- d. Training on the delivery of services to LEP individuals will be provided to new hires and then annually to all MOPD staff. Other trainings vary by type and occur at least quarterly.

## *4. Providing Notice to LEP persons*

- a. Placement of statements in notices and publications that interpreter services are available for meetings, with a seven day advance notice
- b. Placement of posters in the front desk areas of service locations (easily visible) that let potential clients know that we will provide interpreter services if needed. Signage is provided by LanguageLine Solutions at no cost.
- c. Placement of translated common flyers in the literature area of the service location
- d. This information will also be made available via social media (MOPD website, Facebook, etc.)

## *5. Monitoring and Updating the LEP PLAN*

- a. This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP

persons, and also to monitor changes in demographics and types of services. MOPD will update the LEP as needed in conjunction with the Office of New Americans. At a minimum, the plan will be reviewed and updated annually or when data from the most recent U.S. Census is made available, or when clear and higher concentrations of LEP individuals are present in the MOPD service area, whichever is most often.

- b. All MOPD staff will document LEP encounters on tracking sheet (copy of LEP Tracking Sheet attached). Tracking sheets are submitted to the DRU Program Director monthly. Results are provided on monthly performance matrix and discussed at manager and staff meetings (at least quarterly). This information should provide an overview of the languages being requested, where the request is being made and the frequency of such requests. As patterns for specific language requests or services in a particular language emerge, the LEP plan can be revised to meet the current need of the clients. Customer complaints or issues re: language services should be documented on sheet #2 of the LEP Tracking form.
- c. Staff should keep a record of the primary language spoken by each LEP person that services are provided to. These should be documented in ECM (for service delivery users) or other formal client records. Creating a record of language assistance services can help when preparing for future requests for of client services.

<b>SUBJECT: Serving LEP Walk-Ins</b>		Standard Operating
Date: March 6, 2016	PREPARED BY:  Fran Learnahan, Disability Specialist III	MOPD
		APPROVED BY: Kimberly Taylor, Deputy Commissioner

## **PROCEDURE and RESPONSIBILITIES**

Walk-in LEP individuals should be handled in the same manner as other walk-ins. They should be signed in by staff at the front desk and asked to wait until the appropriate staff member calls them by name. When the staff member who is working with walk-ins calls the client the following steps should be taken:

### **1. Determine whether the person is Limited English Proficient**

- a) If the person is speaking another language to you at walk-in and/or asks for an interpreter, or otherwise indicates a preference to communicate in another language other than English, that person is considered LEP. If during intake or at any point thereafter, the person indicates a preference for communication in another language, consider him or her a LEP person.
- b) In addition, if you as a staff member feel that you are unable to communicate clearly with the client or the client appears to not fully understand, you should use an interpreter. The fact that a person has an accent or does not have English as their primary language, alone, is not a sufficient basis to consider them LEP.

### **2. Identify the person's language**

- a) If you are unable to identify the person's primary language, show the client the "Language Identification Card". Copies of this sheet can also be printed from the MOPD shared portion of the "S" drive in the LEP folder. If the person is unable to identify their language from the cards (ex: language not represented on card, client cannot read, etc.) call LanguageLine Solutions.

### **3. Provide in-house or telephone interpreting services to determine why the person has visited the office**

- a) If there is an available staff person that speaks that language, ask the staff person to provide brief interpretation in order to determine the individual's name, contact information and the need for assistance.
- b) Some LEP persons may feel more comfortable when a trusted family member or friend acts as an interpreter. Staff should make the LEP person aware that he or she has the option of having MOPD provide an interpreter for him/her without charge, or of using his/her own interpreter. Staff should also consider special circumstances that may affect whether a family member or friend should serve as an interpreter, such as whether the situation is an emergency, and whether there are concerns over competency, confidentiality, privacy, or conflict of interest. Staff cannot require LEP persons to use family members or friends as interpreters.

- c) If there is no staff person available in the office to interpret, contact LanguageLine Solutions and ask to have an interpreter translate via a three way phone conversation. For individuals who use sign language as their main language, video relay may be an option.

**4. Using the interpreter, determine what level of information, services or referrals we can provide**

- a. Talk directly to the LEP individual, not the interpreter. For example, “What is your name?” and not “Please ask the caller for their name.”
- b. If the LEP individual is willing to share, obtain the caller’s phone number in case of accidental disconnection.
- c. Pause after one or two sentences to allow for interpretation
- d. Ask one question at a time.
- e. Speak clearly at a normal pace and refrain from technical language.

**5. If it is determined that we can assist the client with their issues/concerns/request for service or information, use the interpreter to help the client answer questions to complete any required intake information or provide information on what the person needs to bring with them to achieve their service goal**

- a. It is appropriate to schedule a specific time for the individual to return to ensure that an interpreter is available. This is especially important if the use of the interpreter is expected to last longer than 15 minutes.
- b. When entering service information into ECM (or other database) it is important to note the preferred language of the LEP individual. This will help other staff who may provide services in the future.

**To protect client confidentiality and to avoid any misinterpretation, staff should never ask another client or person present in the office waiting area to determine the language of the potential client or any other client information. The exception to this is when the client brings someone they trust with them to act as their interpreter, such as a family member.**

<b>SUBJECT: Serving LEP Call-Ins</b>		Standard Operating
Date: March 6, 2016	PREPARED BY:  Fran Learnahan, Disability Specialist III	MOPD
		APPROVED BY: Kimberly Taylor, Deputy Commissioner

## **PROCEDURE and RESPONSIBILITIES**

### **1. Determine whether the caller is Limited English Proficient**

- a. If the person is speaking another language to you or asks for an interpreter, or otherwise indicates a preference to communicate in another language other than English, that person is considered LEP. If during intake or at any point thereafter, the person indicates a preference for communication in another language, consider him or her an LEP person.
- b. Staff should not attempt to determine English comprehension – it is the client’s right to have an interpreter if this is his/her preference.
- c. If you as a staff member feel that you are unable to communicate clearly with the client or that the client does not understand you, you should use an interpreter.

### **2. Identify the callers language**

- a. You may ask the caller what his or her primary language is in English. The caller might recognize that question and be able to state their language.
- b. If you are unable to identify the caller’s primary language, call LanguageLine Solutions.

### **3. Provide in-house or telephone interpreting services to determine why the person has called the office**

- a. If there is an available staff person that speaks that language, ask the staff person to provide brief interpretation in order to determine the individual’s name, contact information and the need for assistance.
- b. If there is no staff person available in the office, contact LanguageLine Solutions and ask to have an interpreter translate via a three way phone conversation.

### **4. Using the interpreter, determine what level of information, services or referrals we can provide**

- a. Talk directly to the LEP individual, not the interpreter. For example, “What is your name?” and not “Please ask the caller for their name.”
- b. If the LEP individual is willing to share, obtain the caller’s phone number in case of accidental disconnection.
- c. Pause after one or two sentences to allow for interpretation
- d. Ask one question at a time.

- e. Speak clearly at a normal pace and refrain from technical language.
- f. When entering service information into ECM (or other database) it is important to note the preferred language of the LEP individual. This will help other staff who may provide services in the future.

<b>SUBJECT: Obtaining Translation Services</b>		Standard Operating
Date March 6, 2016	PREPARED BY:  Fran Learnahan, Disability Specialist III	MOPD
		APPROVED BY: Kimberly Taylor, Deputy Commissioner

**PROCEDURE and RESPONSIBILITIES**

**An LEP person may also need program information translated into his or her primary language. MOPD has translated the most frequently used program flyers into the top five languages spoken in Chicago, including Spanish, Polish, Chinese (Simplified), Hindi, and Arabic. These flyers will also be available in braille and large print in limited quantities. If an LEP person requires written program material in a language other than the top five languages or more information on a specific program, it will be translated and provided on request within a reasonable amount of time. This includes material in braille and large print in limited quantities in languages other than English. Please note that this Language Access Policy is specific to MOPD programs and services only. No other translation or interpretation of documents not pertaining to disability services can be provided.**

**1. Determine that a MOPD document requires translation (either into a language other than the five languages identified above or for a new MOPD document that has not been translated previously)**

- a. Staff should not attempt to determine English comprehension – it is the client’s right to have a MOPD document translated if this is his/her preference.
- b. If you as a staff member feel that you are unable to communicate clearly with the client or that the client does not understand you, you should use an interpreter.

**2. Identify the requested language**

- a. You may ask the individual what his or her primary language is in English. They might recognize that question and be able to state their language.
- b. If you are unable to identify the individual’s primary language, call LanguageLine Solutions for assistance.

**5. Obtain the individual’s contact information**

- a. Contact information is important to obtain because staff will not be able to obtain a translated document immediately. It will take time to obtain a quote, approval and translation. Let the individual know that the document will be mailed to them once it has been translated. If there is an available staff person that speaks that language, ask them to provide brief interpretation in order to determine the individual’s name, contact information and provide the process of translation.
- b. If there is no staff person available in the office, contact LanguageLine Solutions and ask to have an interpreter translate via a three way phone conversation.

## 6. Request a Quote

- a. Scan and save an electronic copy of the document to be translated.
- b. Access LanguageLine Solutions online at their website: [www.languageline.com](http://www.languageline.com) .
- c. Click on the “Get a Quote” button in the Translation and Localization section of LanguageLine Solutions home page.
- d. Click on the “Get a Quote” button in the Translation section of the Translation and Localization page.
- e. Complete the electronic form and requested Document File Name of the scanned document. And submit.
- f. If additional assistance is needed with submitting a request for a quote staff may email Jon Bove, Translation and Localization Specialist at JBove@LLTS.com.
- g. LanguageLine Solutions will email a complete quote.
- h. Submit a copy of the document, the quote to your immediate supervisor. Your supervisor will let you know if the request has been approved and/or submitted for Translation.

## 7. When the translated document is received

- a. Make several copies of the translated document for future use.
- b. Submit all receipts, invoices, etc. and the Original Translated Document to your supervisor.
- c. Originals of all translated documents should be kept in a file folder at a location easily accessed by staff. In addition each translated document should be scanned and saved on the “S” drive >MOPD Shared>Program Flyers.

## **OUTREACH AND PUBLIC AWARENESS**

The Mayor's Office for People with Disabilities ultimate goals are to increase the department's ability to communicate with and serve LEP individuals; to develop strong, trusting relationships with immigrant community members; and to ensure that staff can do their jobs effectively. Outreach and public awareness are vital in making these goals into fruition.

It is important to inform the public about your agency's language access policy and language assistance services. LEP residents who are unaware of language assistance services may not fully access them. The task of educating immigrant residents about MOPD's role and services may seem daunting, especially when there is a language barrier. However, our staff plans to relay information to immigrant leaders and residents through community- and faith-based organizations or even local ethnic grocery stores and restaurants. Ethnic print and broadcast media and English as a Second Language programs at libraries and local community centers can also be information hubs for new immigrants.

Providing notices to the public will assist MOPD in connecting with community organizations, colleges and schools, religious groups, community leaders, and other language assistance resources, which can be of vital assistance to the promotion of MOPD programs.

Lastly, MOPD also looks to working closely with the Language Access Advisory Committee Members to assist in providing access to areas aforementioned to help continue the engagement process.

## **VERBAL COMMUNICATION WITH CLIENTS**

Face-to-Face appointments are best, if all possible. Make sure an interpreter is available to the client at all scheduled appointments. Remember that an interpreted meeting may take two to three times as long as a meeting conducted without an interpreter. If you are using MOPD staff as an interpreter, you need to check with your supervisor or the supervisor of the staff that you would like to interpret for you regarding the staff member's availability. If you are using LanguageLine Solutions, call ahead to insure that an interpreter will be available for a longer period of time (over 15 minutes).

If an LEP person approaches you at an outreach or community event attempt to identify the person's primary language, obtain contact information from the person and arrange for an appointment if an interpreter is not available on site. If you cannot identify the primary language (even after using the "Language Identification Card" you remembered to take with you), provide the person with the office phone number or address so they can call in or visit your office. Follow the procedures described previously.

### **AN INTERPRETATION MAY NOT BE GOING SMOOTHLY IF:**

- The interpretation is too long or too short compared to the length of the material being interpreted;
- The interpreter repeatedly asks for clarification
- It sounds like the interpreter is having a side conversation with the LEP individual
- The LEP caller corrects or appears to disagree with the interpreter
- The LEP caller begins to speak in halting and incorrect English
- The interpreter or the LEP caller is becoming increasingly impatient
- It sounds like the interpreter is using many English terms to convey the meaning of your conversation or the interpreter does not conduct himself or herself in a professional manner

**MOPD strongly discourages the use of minor children as interpreters. If a minor is already on the phone or in the office with a parent or relative he/she should only be used to interpret to the extent necessary to identify the language of the potential client, their name, contact information and to arrange an appointment time if one is needed. Do not ask a minor to come in or get on the phone to interpret.**

## WRITTEN COMMUNICATIONS WITH CLIENTS

As with verbal communications with clients, it is important to ensure that LEP clients understand all information contained in our written correspondence. We cannot send LEP clients' instruction letters in English and expect them to get an interpretation of the letter on their own.

1. Check to see if the material you need has already been translated. If no translation exists in the language you need, you may request a written translation quote. Review the material for ease of understanding. Are there ways to improve the English text before it is translated? Remember who the target audience is and their level of understanding. For many of our clients, if the original English text is too difficult for them to gain an understanding of the document, the translated text will probably also be too difficult. Even when the translation preserves the ease of reading found in the English original, the translated text may still be too difficult for the intended readers if their reading skills are more limited than the English readers' skills. Translate for meaning (rather than word for word), in a culturally sensitive way.
2. Contact your supervisor for approval of the expense and to facilitate having the material translated.
3. If the material will be very detailed and/or case specific, you may wish to meet with the client face-to-face or over the phone rather than sending the material to them. Make sure to document the content of the meeting in the client's file (paper or ECM, whichever is appropriate). Responses to complaints should always be in writing.
4. When handing or mailing MOPD and other brochures/packets/flyers to LEP clients make sure they are in the person's preferred language if possible. English brochures should be accompanied by a multi-lingual insert explaining the right to have the brochure read to the person in his or her language. MOPD vendors should contact their respective MOPD contact to see if a translated version of a document is already available.

### Key Terms:

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

b) **Bilingual Persons:** Persons who are bilingual are fluent in two languages and are able to conduct the business of the workplace in either of those languages. This is to be distinguished from proficiency in more than one language. An individual who is proficient in a language may, for example, be able to greet an LEP individual in his or her language, but not conduct agency business in that language. Interpretation and translation require the interpreter to be fluently bilingual, and also require additional specific skills as described below in (c).

c) **Interpretation:** Interpretation involves oral communication. Interpretation involves the immediate communication of meaning from one language into another. Interpreting is a complex task that combines several abilities beyond language competence in order to enable delivery of an effective professional interpretation in a given setting.

d) **Translation:** Translation involves written communication. An interpreter conveys meaning orally; as a result, interpretation requires skills different from those needed for translation