Limited English Proficiency Plan

Franklin County Department Of Job And Family Services
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6/30/2015

Civil Rights Coordinator
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Report Includes (Check All That Applies):
Djfs___X____
Pcsa_____
Csea_____
Wia One Stop_____

Included Is The Franklin County Department Of Job And Family Services
Civil Rights Plan

Revised 06/2015

Limited English Proficiency Plan

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Limited English Proficiency Plan

I. Purpose

The purpose of this Limited English Proficiency plan (plan) is to provide assurances and demonstrate that customers of Franklin County Department of Job and Family Services are being provided meaningful access to program information, benefits and services although the customers may be limited in their English Language Proficiency. This plan will be updated bi-yearly to refresh the assurances contained in the plan, address any changes in methods and update any changes in the LEP population utilizing the county agency.

It is understood that the Ohio Department of Job and Family Services' Bureau of Civil Rights (BCR) is charged with the duty to ensure that each county agency is in compliance with all relevant federal requirements involving applicants/recipients of program information, benefits and services who have limited English Language Proficiency (LEP).

II. Authorities and Definitions

Federal Authorities

- **Title VI of the Civil Rights Act of 1964,** 42 U.S.C. §2000 et seq.; 45 CFR §80, Nondiscrimination based on race, color or national origin for any programs receiving federal financial assistance. Failure to provide meaningful access to program information, benefits and/or services due to an applicant/recipient's LEP is considered discrimination based on national origin.

- **U.S. Department of Justice Title VI Legal Manual**, January 11, 2001 edition

- **U.S. Department of Labor Policy Guidance on the Prohibition of National Origin Discrimination as it Pertains to Persons with Limited English Proficiency (05/29/03),** Federal Register, Volume 68, Number 103, Page 32289-32305

- **Food Stamp Program LEP regulations,** 7 CFR §272.4

- **Ohio Department of Job and Family Services Language Access Policy**, Dated January 20, 2005

- **Ohio Administrative Code section 5101:9-2-01**

- **Ohio Administrative Code section 5101:9-2-05**

Definitions of Terms:

- **County Agency** – County Departments of Job and Family Services, County Child Support Enforcement Agencies, Public Children Services Agencies, WIA funded One-Stop Agencies standing alone or any combined agencies with a single administrative structure.

- **Effective Communication** – In a human services, social services or job training/assistance setting; effective communication occurs when county agency staff have taken necessary steps to make sure that a person who is LEP is given adequate information in his/her

language to understand the services, benefits or the requirements for services or benefits offered by the county agency. These necessary steps must allow an individual the opportunity to qualify for the benefits or services provided by that county agency without unnecessary delay due to the person's LEP. Effective communication also means that a person who is LEP is able to communicate the relevant circumstances of his/her situation to the county agency.

- **Interpretation** – Interpretation means the oral or spoken transfer of a message from one language into another language.

- **Limited English proficiency** –A person with limited English proficiency or "LEP" is not able to speak, read, write or understand the English language well enough to allow him/her to interact effectively with a county agency.

- **Meaningful access** – "Meaningful access" to benefits, programs and services is the standard of access required of the county agencies since they receive federal funding through the state of Ohio. Meaningful access requires compliance by county agencies with state and federal LEP requirements as set out in relevant state and federal laws. To ensure meaningful access for people with LEP, county agencies must make available to applicants/recipients of benefits/services free language assistance that results in accurate and effective communication that does not result in undue delay or denial of benefits to which the LEP applicant/recipient is eligible.

- **BCR** – The entity contained within the Ohio Department of Job and Family Services charged with the responsibility of overseeing compliance by county agencies with relevant civil rights laws including those related to LEP.

- **Translation** – Translation means the written transfer of a message from one language into another language.

- **Vital Documents** – forms or documents *designed and utilized by the county agency* that are critical for accessing federally funded services or benefits or are required by law. Vital documents can include but are not limited to; applications for county designed programs, consent forms designed by the county agency, letters designed by the county agency requesting eligibility documentation.

- **Outreach Documents** – county agency designed documents utilized by the county agency to provide information to the general public but targeting individuals who are eligible or may be eligible for county benefits/services or programs.

III. Franklin County Department Of Job And Family Services Policy

It is the policy of Franklin County Department of Job and Family Services to provide meaningful access to all individuals applying for, participating in programs or receiving services/benefits administered by, supervised by, authorized by and/or participated in by Franklin County Department of Job and Family Services, its contractors and/or vendors. Meaningful access involves Franklin County Department of Job and Family Services promoting effective communication to LEP individuals seeking or receiving services, benefits or participation in

programs funded in whole or in part by federal funds. This plan specifically provides necessary assurances and identifies tools being used to effectuate this policy.

IV. LEP Population

Franklin County Department of Job and Family Services has determined that the language(s) other than English that is/are most likely to be encountered by employees of the Franklin County Department of Job and Family Services is/are :

Amharic	Arabic	Vietnamese
Tigrinya	French	Khmer
Mandarin	Nepali	Russian
Somali	Spanish	

The methodology used to make this determination is as follows: Franklin County Department of Job and Family Services obtained its data from its interpreter utilization. Any LEP language group that comprises at least 5% or 1,000 individuals whichever is less, of persons eligible for or likely to be affected by the agency's services or benefits must be included as one of the county languages.). Franklin County Department of Job and Family Services will periodically monitor the LEP population of those served or those who could be served by Franklin County Department of Job and Family Services. If it is determined that other LEP language groups are seeking benefits/services or are potentially eligible to receive benefits/services within the Franklin County, Franklin County Department of Job and Family Services will adjust its methods and services to serve the new population accordingly. Any new LEP populations will be reflected in the next LEP plan.

V. Methods of Providing Services to LEP Population

(Check any that are applicable)

☒ Bi-lingual Employee(s) (if checked provide employee(s) names and language(s) with brief description of method of determining competence as interpreter(s)).

Staff work assignments:

West Community Opportunity Center:
Raiza Romero ---------- Spanish
Amanda Lam ---------- Cambodian

Northland Village Community Opportunity Center
Maria Haddad ----------Hungarian
Munirah Paknazhad ---------- Farsi
Rick Evans---------- Spanish
Keith Romney---------- Spanish
Jean Andre ---------- French Creole
Dorcas Hernandez----------Spanish

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Abdulkadir Osman---------- Somali
Cynthia Watiker ---------- Spanish

East Community Opportunity Center
Mohamoud Ali ----------Somali, Arabic, Russian, and French
Somchanh Opma----------Laotian and Thai
LaDonna Winbush ---------- Sign Language

None of the Department's employees have been tested or trained as interpreters. Their language abilities are not used as an integral part of their jobs but rather to assist when an unplanned situation arises and where the Department did not have an opportunity to schedule a professional interpreter. They are used in a stop-gap fashion to convey short messages when communication would otherwise not be possible.

☐ Staff Interpreter(s) (if checked provide name(s) and language(s) with brief description of method of determining competence as interpreter(s).).
None

☒ Interpreter Contract (if checked, provide name(s) of contractor(s), list service(s) provided, language(s) covered, and brief description of how vendor(s) was/were chosen. Also attach copy of agreement or contract to this plan)

The Department has a contract with one interpretation vendor: Access 2 Interpreters. The vendor was chosen through a competitive request for proposal process. They provide interpretation services in 69 languages in person and 187 languages via telephone. The services provided under the interpretation contracts are as follows:

•Regularly scheduled interpretation services available at the Opportunity Centers in Spanish, Somali, Nepali and Arabic.
•On-call, face to face interpretation the same day for the 69 locally available languages. (Depending on availability of an interpreter for a particular language, some on-call requests may take longer.)
•Telephone interpretation services available the same day within 30 minutes of scheduling for all 187 available languages.
•Instantaneous telephone interpretation available in 187 languages.

Data tracking allows the Department to monitor the number of customers at each Opportunity Center by primary language in order to identify trends in customer populations and to add additional on-site interpreters as needed.

A copy of the contract is attached as Attachment A

☐ Volunteer Interpreters (if checked provide names, organization if applicable as well as brief description of method of determining competence as interpreter).
None

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☒ Telephone Interpreting Services (if checked provide name of vendor with brief description of how vendor was chosen. Attach copy of contract to this plan)

See the narrative on Interpreter Contract for use of telephone interpreting services

☐ Agreement with Educational Institution (if checked provide name of institution, name(s) of interpreters, brief description of method of determining competence of interpreter. Attach copy of agreement, MOU or other written document to this plan. If nothing in writing, describe arrangement).
None

☒ Translation contracts (if checked provide name(s) of contractor(s), list service(s) provided, language(s) covered and brief description of how vendor was chosen. Also attach copy of agreement or contract to this plan).

The Department has a contract with Access 2 Interpreters for translation services. This vendor was chosen through a competitive request for proposal process. They provide translation services in 187 languages.

A copy of the contract is attached as Attachment A

☒ Other (if checked explain arrangement and attach any relevant documents explaining the arrangement to this plan).

The Department has contracts for ESOL services in various sites throughout the county in four locations. Currently, the Department has contracts with three community agencies to provide basic employability skills, job readiness, placement and retention, and career services specifically for refugees and the LEP population. The agencies providing these services have bilingual staff that either teach or assist with the classes. This is particularly important for our refugee customer population. Many of our refugee customers speak limited or no English and may be illiterate in their own language. Providing employability through an interpreter is ineffective. Delivering the curriculum verbally and through visual aids has proven effective in assisting these individuals with job search and acquisition.

Finally, the Department contracts with Action for Children to provide mandatory trainings to individuals seeking or maintaining licensure as a home child care provider. This contract affords Action for Children to provide training in Health and Safety, Communicable Disease Management, Child Abuse Recognition/Prevention, and Child Growth and Development to LEP individuals seeking or maintaining licensure through contracted interpreters.

VI. Interpreter Services

Franklin County Department of Job and Family Services , at no cost to the LEP individuals or families, provides interpreter services to all LEP individuals or families applying for, participating in programs or receiving services/benefits through the Franklin County Department

of Job and Family Services by the means designated in section V. of this plan. The interpreter services are provided in an efficient and timely manner so as not to delay a determination of eligibility for an individual or family, receipt of eligible services/benefits or participation in a county run program beyond that of an English speaking individual or family. The Franklin County Department of Job and Family Services makes this policy known to the LEP through the following methods (e.g. posters in other languages, Babel cards, etc.).

In addition to ongoing efforts to recruit and hire bilingual staff at all Centers, all of our Centers have regularly scheduled, onsite interpreters through our interpretation contracts.

The Northland Village Center has 135.5 hours of regularly scheduled Spanish interpretation (40 hours assigned in the call center), 128 hours of regularly scheduled Somali interpretation (40 hours assigned in the call center), 80 hours of Nepali interpretation and 64 hours of Arabic interpretation per week.

The West Center has 120 hours of regularly scheduled Spanish interpretation and 64 hours of regularly scheduled Somali interpretation and 40 hours of Arabic/Somali interpretation per week.

The East Opportunity Center has 40 hours of regularly scheduled Spanish Interpretation per week.

(This information is current as of June 2015, but these hours are subject to change based on need and/or usage trends.)

Additionally, signage has been installed in each Opportunity Center welcoming customers in multiple languages as well as advising customers in multiple languages that free interpretation services are available.

Franklin County Department of Job and Family Services addresses phone calls and voice mail by LEP individuals in the following manner (describe County agency phone services for LEP individuals. If addressed through something checked in section V. can reference that portion).

Staff will call the contracted interpretation provider(s) to provide assistance in addressing phone calls and voicemails from or to LEP individuals (see description of services under Interpretation Contract on page 6). If an interpreter is onsite, that interpreter will be used to address telephone calls and voicemails.

Franklin County Department of Job and Family Services addresses walk-ins to the Franklin County Department of Job and Family Service Opportunity Centers who are LEP individuals in the following manner (refers to receptionists or point of contact) .

The front desk staff uses a language card to assist customers in communicating that they need interpretation assistance and in identifying the language spoken if the language is not obvious. Staff also uses onsite interpreters to ascertain if a customer needs an interpreter and to identify the language spoken by the customer. Where use of the language card or onsite interpreters is not sufficient to ascertain a customer's need for an interpreter, staff may also request assistance from the contracted interpretation provider(s).

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Staff offers interpretation services to any customer who appears to be LEP. The front desk staff also provides an "I Speak..." card that can be given to an LEP customer once his/her language is identified. The customer may then carry this card with him/her for any situation where they may need interpretation services to facilitate the identification of an appropriate interpreter. Where interpretation services are offered and declined by a customer, staff documents that the customer has declined interpretation services.

Franklin County Department of Job and Family Services does not require, suggest or encourage LEP individuals or families to use friends, family members or minor children as interpreters. If an LEP individual or family insists that a friend or family member serve as interpreter, Franklin County Department of Job and Family Services will inform the friend or family members that they may stay but will not be able to serve as interpreters. However on rare occasions or emergencies, Franklin County Department of Job and Family Services will, on a case by case basis, consider factors such as: competence of the family or friend to be used as the interpreter; the appropriateness of the use in light of the circumstances and ability to provide quality and accurate information, especially if the interview could result in a negative affect on the individual or family's eligibility for benefits/services; potential or actual conflicts of interest; and confidentiality of the information being interpreted to determine whether Franklin County Department of Job and Family Services should provide its own independent interpreter for itself. In no case does Franklin County Department of Job and Family Services allow a minor child to act as interpreter for an LEP individual or family.

VII. Translation of Documents

Franklin County Department of Job and Family Services translates all county designed vital documents into each LEP language group that comprises at least 5% or 1,000, whichever is less, of persons eligible for or likely to be affected by the agency's services. Currently, all commonly used county forms have been translated into Arabic, Somali and Spanish and are available to all staff on a shared drive. Preliminary data has identified Nepali as potentially meeting the standard. If confirmed, Franklin County Department of Job and Family Services will utilitze its translation contracto to have commonly used county forms translated into Nepali. All commonly used state forms have been translated by ODJFS. No other languages meet the 5% or 1,000 rule.

Franklin County Department of Job and Family Services translates all outreach documents for each LEP group that equals 10% or 3,000, whichever is less, of persons eligible for or likely to be directly affected by the (County Agency name) services. Currently, the department translates outreach documents into Arabic, Somali and Spanish. Preliminary data has identified Nepali as potentially meeting the standard. If confirmed, Franklin County Department of Job and Family Services will utilitze its translation contracto to have outreach documents translated into Nepali. No other languages meet the 10% or 3,000 rule.

For any LEP individuals applying or receiving services from Franklin County Department of Job and Family Services where vital documents are not available in the LEP individual's language, Franklin County Department of Job and Family Services provides a notice in the LEP individual's language that the LEP individual may bring any document into the Franklin County Department of Job and Family Services office and an interpreter will be provided free of charge to interpret the document for the LEP individual.

VIII. Dissemination of Information to County Agency Personnel

Franklin County Department of Job and Family Services makes its personnel aware of its LEP policies, methods of providing services to LEP individuals and other information contained within this plan through the following: (explain in some detail, e.g. training by civil rights coordinator, on-line training, new employee orientation, personnel handbook, hand-outs, etc.).

The Department has training staff that is available to provide training to all new employees and continuous training in Title VI, including LEP, to all staff. The training staff also disseminates the Civil Rights and LEP Plan to all staff.

At the time of hire, new employees are provided with the Franklin County Commissioners Handbook, which includes the county's Non-Discrimination Policy. That handbook is reviewed by new employees at the initial new hire orientation presented by the Franklin County Human Resources Department.

Additionally, all new Department employees are required to attend a three-hour Multicultural Awareness training course presented by the Franklin County Human Resources Department during their probationary period. Non-probationary employees may also re-attend the Multicultural Awareness training course at any time.

IX. (Optional)

Any other information, explanation, or assurances connected to LEP issues provided at the option of the County agency.

The Department offers an interactive DVD in Somali and Spanish that teaches and advises individuals on their legal rights and responsibilities. This DVD was prepared in conjunction with the Ohio State Bar Foundation.

X. Attachments

Attachment A - The Franklin County Department of Job & Family Services' Purchase of Service Contract with Access 2 Interpreters - Interpretation and Translation Services

Attachment B - Franklin County Department of Job and Family Services Civil Rights Plan

Attachment C - None

Attachment D - None

Attachment E - None

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Signatures:

on behalf of Anthony Trotman, Director

Person with authority	Title	Date
Christy A Russell	Asst Director/CFO	7-13-15
Michelle Lindeboom	Asst. Director	7-13-15
Laura Repaal	Chief Legal Counsel	7/13/15
Annie Bonnie	Deputy Director, Development Support Services	7/13/15