

Limited English Proficiency Plan (LEP Plan)

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Overview

AVDA has identified that Spanish and Haitian Creole are the languages spoken in our community. The analysis of the general population and population served by our agency revealed that we need to provide meaningful access in each of these languages.

Strategies for building relationships with and increasing our capacity to serve Spanish and Haitian Creole speaking community members are outlined in this plan.

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: involves conveying information orally from one language to another (e.g. interpreting during an interview)

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

Vital documents: documents that are critical for accessing services or documents required by law. For the purposes of AVDA's services to survivors and other constituents the following are deemed vital documents:

1. Any and all domestic violence or related brochures generated by AVDA for use by survivors
2. Community education materials generated by AVDA for distribution
3. Crisis information or referral information to area resources
4. Direct service forms ¹

¹ Adapted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency (LEP) Plan, <http://kcsdv.org/images/pdfs/model-LEP-plan.pdf>

Language Access Strategies

AVDA offers a 24-Hour Crisis Hotline, Emergency Shelter, Transitional Housing, Outreach, and Community Education and Prevention. We have identified several strategies for creating meaningful access to these services for speakers of other languages.

| Service | Language Access Strategies |
|------------------------------------|---|
| 24-Hour Crisis Line | <ul style="list-style-type: none"> • Train all staff and volunteers on connecting to OPI Language Line services. • Recruit bi-lingual individuals during the hiring process for commonly spoken languages other than English. |
| Emergency Shelter | <ul style="list-style-type: none"> • Hire bi-lingual staff for critical shifts providing service management. • Train all staff and volunteers on connecting to the OPI Language Line services. • Utilize primary language data collection source upon intake to alert all staff of participant's primary language. • Maintain critical documents in Spanish and Creole. |
| Transitional Housing | <ul style="list-style-type: none"> • Train all staff and volunteers on connecting to the OPI Language Line services. • Utilize primary language data collection source upon intake to alert all staff of participant's primary language. • Cross train shelter advocates to provide support and translation for survivors in Transitional Housing. • Maintain critical documents in Spanish and Creole. |
| Outreach Services | <ul style="list-style-type: none"> • Hire bi-lingual staff for critical outreach positions such as Legal Advocate. • Train all staff and volunteers on connecting to the OPI Language Line services. • Utilize primary language data collection source upon intake to alert all staff of participant's primary language. • Maintain critical documents in Spanish and Creole. |
| Community Education and Prevention | <ul style="list-style-type: none"> • Assure promotional materials alert potential attendees of the availability of auxiliary aids requested in advance. • Collaborate with location requesting education services for onsite translation for LEP attendees. • Provide translation services during education programming for LEP attendees. |

General Policy Statements

1. AVDA will never turn anyone away because they do not speak English. Furthermore, AVDA will work to improve our capacity to provide meaningful access to individuals with limited English proficiency every year by maintaining and distributing AVDA's LEP Plan to staff and annual Civil Rights training, which will include LEP Plan and accommodations, for staff and volunteers.
2. AVDA's primary focus is to provide support and safety to victims of domestic violence and sexual assault through direct services. Therefore, AVDA 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.²
3. It is the policy of AVDA 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 AVDA will provide these services to them.
4. AVDA's goal is to offer and provide the same high quality service to all survivors, regardless of their language and communication abilities. The President & CEO or designee will be in charge of implementing AVDA's plan for assisting survivors with limited English proficiency.³
5. AVDA will not use minor children to interpret in order to ensure confidentiality of information, accurate communication, and to prevent re-traumatizing children. Child interpreters prohibited.
6. AVDA will not use other survivors to interpret in order to ensure confidentiality of information and accurate communication. The use of other survivors to interpret is prohibited.

² Adapted from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency (LEP) Plan, <http://kcsdv.org/images/pdfs/model-LEP-plan.pdf>

³ Adapted from the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP/LegalServicesofWesternMissouriLEPPlan.pdf

Purpose and Authority

1. The purpose of this plan is to ensure that AVDA provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. AVDA 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 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.⁴
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 promote violence-free relationships and social change by offering alternative choices to end violence and domestic abuse.

⁴ Excerpted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency Plan. Available at <http://kcsdv.org/images/pdfs/model-LEP-plan.pdf>

Determination of Regularly Encountered Languages

Policy: AVDA will provide written material for the public and direct service participants in regularly encountered languages other than English.

Procedures:

1. On an annual basis, the Program Services Director will:
 - a. Conduct an internet search for specific demographic information for Palm Beach County utilizing current census information located at <http://quickfacts.census.gov> to determine which languages AVDA is required to provide written materials for the public and direct service documents.
 - i. AVDA is required to translate public flyers, brochures, and educational material, including our website, and direct service documents in other languages when a population exceeds 5% of the overall population in Palm Beach County.
 1. The President & CEO or designee will ensure that any additional languages or updates are made to the website or brochures
 2. The PSD or designee will work with program staff to ensure that all essential documents for participants are translated in a timely manner.
 - b. Review unduplicated demographic records from Osniium for a complete year to determine the need for direct service materials in other languages.
 - i. AVDA will provide direct service documents in languages that don't exceed 5% of Palm Beach County's population based on the most current census but do represent a large portion of the participant's served at AVDA.
 1. The Program Services Director or designee will work with program staff to ensure that all essential documents for participants are translated in a timely manner.

Language Assistance Measures

| Point of Contact | Expectations of Staff | Tools and Resources |
|---|--|--|
| Crisis Line | <ul style="list-style-type: none"> Identify language spoken. | <ul style="list-style-type: none"> Language Line Bilingual Staff |
| Participant Services (Residential and Outreach; Individual and Group) | <ul style="list-style-type: none"> Identify language spoken. Ensure that an interpreter is available. When using an outside interpreter, follow best practices for ensuring safety for participant by using AVDA's authorized interpreting service, securing the name of the interpreter in advance, and requiring interpreter to sign confidentiality agreement. Notify participant of the available of language services on an ongoing basis, immediately provide access to the language line when requested. | <ul style="list-style-type: none"> I Speak Cards Bi-lingual Staff Language Line In-Person Interpreter (Release of Information) |
| Providing Referrals | <ul style="list-style-type: none"> Call the referral source and identify a point of contact with adequate language capacity. Discuss the LEP Plan for the referral source and relay that information to the participant. Connect the participant with the point of contact. | <ul style="list-style-type: none"> Bi-lingual Staff Language Line |
| Community Outreach | <ul style="list-style-type: none"> 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. | <ul style="list-style-type: none"> Brochures in alternate languages |
| Community Events | <ul style="list-style-type: none"> Identify language spoken. Connect with event location staff to develop a plan for LEP attendees. Arrange for an interpreter to be present at event, if needed. | <ul style="list-style-type: none"> AVDA Staff Bi-lingual AVDA staff or event site staff In-Person Interpreting Agency |

| | | |
|-------------------|--|---|
| Support Groups | <ul style="list-style-type: none"> • Arrange for an interpreter to be present at every support group during the survivor’s stay. | <ul style="list-style-type: none"> • Bi-lingual Staff • In-Person Interpreting Agency |
| Written materials | <ul style="list-style-type: none"> • Vital documents are available in Spanish and Haitian Creole. • Vital documents are to be reviewed with the support of an interpreter during intake. | <ul style="list-style-type: none"> • Bi-lingual staff can translate vital documents for all staff to access • Additional translations can be arranged through selected translation agency. • Bi-lingual Staff or Language Line for document review with participants |

1. AVDA is committed to ensuring quality services to all survivors and toward that goal we have developed a plan to provide meaningful access to our services for survivors with LEP through bilingual advocates, and when needed, we will provide in-person interpreter services via in-person or over-the-phone interpretation.⁵
2. AVDA is committed to assuring clear, confidential, two-way communications with all survivors. As part of this commitment, AVDA will provide trained and competent bi-lingual staff or interpreters, whenever oral communication is needed. This service will be provided at no charge to the survivor. AVDA’s preferred means of achieving this goal will be to employ Victim Advocates who are fluent in the major languages spoken by survivors in our community.
3. When AVDA staff members who are working directly with a survivor are not fluent in the survivor’s language, AVDA will use the services of an over-the-phone or in-person interpreter service, which uses trained and tested interpreters.

⁵ Adapted with permission from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency Plan. Available at <http://kcsdv.org/images/pdfs/model-LEP-plan.pdf>

Staff who Speak, Read, and Write Other Languages

S = Speak R=Read W=Write

| Employee Name | Language | Program | Phone Number (s) | Language KSA |
|----------------------|-----------------|----------------|-------------------------|---------------------|
| Ana Camposeco | Spanish | Residential | 265-2900 | S, R, W |
| Ileana Diaz | Spanish | Outreach | 573-2463 (Cell) | S, R, W |
| Michelle Pace | Spanish | Residential | 265-2900 | S, R, W limited |
| Nicole Martinez | Spanish | Outreach | 265-3797 x111 | S, R, W |
| Melanie Rodriguez | Spanish | Outreach | 265-3797 x114 | R, S, W limited |
| Youseline Martinez | Spanish | Residential | 265-2900 | S, R |
| Tessy Lacroix | Spanish | Residential | 265-2900 | S, R, W |
| Andrea Sanchez | Spanish | Residential | 265-2900 | S, R, W |
| Serica Guerrier | Creole | Residential | 265-2900 | S |
| Youseline Martinez | Creole | Residential | 265-2900 | S, R |
| Tessy Lacroix | Creole | Residential | 265-2900 | S, R, W |
| Marie Celestin | Creole | Residential | 265-2900 | S, R, W |
| Melissa Onappeau | Creole | Residential | 265-2900 | S |
| Markos Fleury | Creole | Outreach | 265-3797 | S, R, W |
| Youseline Martinez | French | Residential | 265-2900 | S, R |
| Tessy Lacroix | French | Residential | 265-2900 | S, R, W |
| Marie Celestin | French | Residential | 265-2900 | S, R, W |
| Hima Patel | Hindi | Outreach | 265-3797 | S (R & W limited) |
| Hima Patel | Gujarati | Outreach | 265-3797 | S (R & W limited) |

| | | | | |
|------------|---------|----------|----------|---|
| Hima Patel | Punjabi | Outreach | 265-3797 | S |
| Hima Patel | Urdu | Outreach | 265-3797 | S |

*****Bilingual staff shall not provide interpretation or translation services for participant's receiving services from other organizations.***

Language Line and In-Person Interpreting Services

Optimal Phone Interpreters (OPI) Language Line

Before Call:

- Know the language that is needed
- Be prepared to brief the interpreter about the nature of the call before he/she speaks to your Limited English Speaker
- If you have non English Speaker on the phone call OPI and connect a 3 way call
- For outbound calls, provide the operator with a dial out number and she will make a 3 way conference call

How to Make a Call to OPI:

- **Dial 1-877-344-9674 you will be asked**
 - What language you need
 - Where you are calling from and respond: FCADV
 - What is your first and last name (actual name)
 - Name of the center: Aid to Victims of Domestic Abuse, Inc,
 - What is the code number for your agency---601

During the Call:

- Speak in short phrases or sentences
- Avoid slang, jargon, and technical terms
- Check for understanding from you Limited English Speaker throughout the call. If needed, rephrase the questions or statements until understood
- When speaking to the interpreter, do not give and/or ask too much information at one time.
- Ask questions in the first person

Ending the Call:

Be sure the Limited English Speaker and Optimal Interpreter know that the call is ending.

Global Translations and Interpretations

In-person interpreter services: 561-641-3973

In-Person Communication Etiquette

Interacting with People who are Limited English Proficient

The way a person with Limited-English Proficiency communicates in English will vary from no English, to a little English or to very well. Use the following guidelines when communicating with a person with Limited-English Proficiency:

- If you are speaking through an interpreter, remember the interpreter may lag a few moments behind what is being said, so pause occasionally to allow time for a complete translation.
- Talk directly to the person, not the interpreter. However, the LEP person may look at the interpreter and may not make eye contact with you.
- If you know a little of the language, try using it. It may help you communicate and at least demonstrates your interest in communicating and willingness to try.
- Do not simplify your speech or raise your voice. Speak in a normal tone.
- Be patient and sensitive to the needs of the LEP person.
- The person's single greatest communication need is to have access to the information by having the information either orally translated or provided in their language written form.

Notification of Language Assistance Services

1. AVDA has posters notifying survivors with LEP of their language service rights and are displayed in areas where intakes are conducted.
2. In all of AVDA's direct service locations and on our website, AVDA posts and maintains clear and readable signs in the languages most prevalent in our community notifying survivors that free translation and interpretation services are available to them.
3. AVDA has "I speak" cards in with multiple languages available in all direct service locations.

Monitoring and Maintenance of LEP Plan

1. AVDA will conduct an annual review of its LEP plan to determine its overall effectiveness and identify new strategies for serving survivors with LEP. AVDA's Program Services Director will lead the evaluation with the assistance of other staff. The review will include the following:
 - a. Assessment of the number of persons with LEP and languages spoken in our services area
 - b. Assessment of the number and types of language requests during the past year
 - i. AVDA staff will record each person's language of choice in Osnum. If the individual has limited English proficiency, the person's language of choice will be clearly documented in Osnum.
 - c. 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 accessible⁶
2. AVDA will monitor changing population levels and the language needs of individuals with LEP in the region.
3. In connection with updates to this LEP Plan, AVDA may use some of the following tools to conduct further assessment:
 - a. Conduct survivor focus groups
 - b. Develop an evaluation process to assess LEP service provision
4. Results and recommended changes will be incorporated into the updated LEP plan, annually.⁷

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⁷ Adapted from the MARC plan available at <http://marc.org/Transportation/Equity-Considerations/pdf/LimitedEnglishProficiencyPlan.aspx>