

A. POLICY STATEMENT

It is the policy of St. Tammany Parish Government (STPG) to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). This policy is to ensure that staff will communicate effectively with LEP individuals and that LEP individuals will have access to important programs and information. STPG is committed to complying with federal requirements in providing meaningful access to its programs and activities for its LEP clients.

B. WHO IS LIMITED ENGLISH PROFICIENT (LEP)

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English.

- Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently.
- LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (e.g., program requirements, policies and procedures) in English.

C. BACKGROUND

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of federal funds must provide meaningful access to LEP persons in federal and federally assisted programs and activities.

- On August 11, 2000, Executive Order 13166, titled, "**Improving Access to Services by Persons with Limited English Proficiency**," was issued. Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to...federally conducted programs and activities by eligible LEP persons..."

D. FRAMEWORK FOR DECIDING WHEN LANGUAGE SERVICES ARE NEEDED

STPG will take steps to ensure meaningful access to its programs, services and activities for LEP individuals in a manner that balances the following four factors:

Four-Factor Analysis:

1. The number or proportion of LEP persons eligible to be serviced or likely to be encountered by STPG:

Parish staff reviewed 2010 Census data regarding the language spoken at home by STP residents. According to the data, 98.1% of Parish residents speak English "very well." An estimated 1.9% of residents speak English less than "very well." The language with the highest number of speaking residents, other than English, is Spanish. There are 7,165 Spanish speaking residents in St. Tammany Parish. There are 4,101 other Indo-European language speaking residents in the Parish as well. Please see detailed census data below:

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Subject	Estimate
Population 5 years and over	219,351
Speak only English	93.9%
Speak a language other than English	6.1%
Spanish or Spanish Creole	3.3%
Other Indo-European languages	1.9%
Asian and Pacific Island languages	0.8%
Other languages	0.1%
SPEAK A LANGUAGE OTHER THAN ENGLISH	
Spanish or Spanish Creole	7,165
5-17 years	1,351
18-64 years	5,168
65 years and over	646
Other Indo-European languages	4,101
5-17 years	559
18-64 years	2,668
65 years and over	874
Asian and Pacific Island languages	1,821
5-17 years	256
18-64 years	1,424
65 years and over	141
Other languages	298
5-17 years	31
18-64 years	263
65 years and over	4
CITIZENS 18 YEARS AND OVER	
All citizens 18 years and over	170,292
Speak only English	95.4%
Speak a language other than English	4.6%
Spanish or Spanish Creole	2.3%
Other languages	2.4%
PERCENT IMPUTED	
Language status	2.9%
Language status (speak a language other than English)	2.5%
Ability to speak English	4.3%

2. The frequency with which LEP persons using a particular language come in contact with STPG;

St. Tammany Parish Government Department of Grants assessed the frequency in which staff have or could have contact with LEP persons. To date, one request has been made to the Parish's transit provider to translate a transit brochure into Spanish.

3. The nature and importance of the STPG program, activity, or service provided to the person's life;

The Parish provides a variety of services and programs to its citizens. To date, St. Tammany Parish staff members have not yet been put in a situation in which language barriers prevented a service from being provided. In the event that a program beneficiary does not speak English very well, s/he has typically been accompanied by a friend or family member that serves as an interpreter. In the event that a person of limited English proficiency is in need of service and is not accompanied by an interpreter, Parish staff will provide the person with a form from Language Line Services that assists them in identifying their language needs so that an interpreter can immediately be contacted over the phone.

4. The resources available to STPG, and costs associated with different language service options:

The Parish will maintain a list of LEP service providers that may be contacted in the event that interpreter or translation services are needed.

- i. If a client requires a Spanish interpreter, an identified Parish staff person (who is fluent in Spanish) from the Parish's Community Action Agency will be contacted to assist.
- ii. If a walk-in client requires interpretation service for a language other than Spanish (or if the bilingual Parish staff person is unavailable), s/he will be asked to identify the language they speak via a flyer provided by Language Line Services. Once the language is identified, Language Line Services will be contacted for an interpreter. The Parish will absorb any costs associated with this service.
- iii. If a client needs a document translated into another language, the Parish will obtain quotes from three providers on the LEP provide list for the service. The appropriate provider will then be contacted to provide the translation service. The Parish will absorb the costs associated with this service.

E. DEFINITIONS

- **Primary Language:** the language in which an individual is most effectively able to communicate.
- **Limited English Proficiency person:** any person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such person or persons shall be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit, or encounter.
- **Interpretation:** the act of listening to a communication in one language and orally converting it into another language while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.
- **Translation:** the replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.

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- **Bilingual:** the ability to speak two languages fluently and to communicate directly and accurately in both English and another language.
- **Direct Communication:** monolingual communication in a language other than English between a qualified bilingual employee or other bilingual person and an LEP individual (e.g. Spanish to Spanish).
- **Vital Documents:** any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds or that are required by law.

F. LEP MONITORING AND UPDATING THE LANGUAGE ACCESS PLAN

STPG has designated Candice Mahoney (CDBG Program Manager) as its LEP Coordinator. Monitoring and implementation of the Language Access Plan (LAP) will be conducted by the managers in each service area. The LAP will be reviewed annually by the LEP Coordinator to determine whether updates are needed. The LEP Coordinator will:

- Coordinate identification of language service needs and strategies so that staff will have access to appropriate language services in their interactions with clients.
- Ensure the agency's compliance with the LEP Policy and LAP.
- Provide information to staff on implementation of the LAP and the use of language service providers.
- Establish and maintain the agency's language assistance resource list.
- Establish a bilingual staff list. Review qualifications of bilingual staff to ensure quality and skill level.
- Maintain type and frequency of interactions with LEP persons and provide reports to management, as appropriate.
- Provide notice of language assistance services in the following areas:
 - Posters in public areas
 - STPG Website
- Conduct an annual review to assess changes, if any, in:
 - Census data;
 - Current LEP populations affected or encountered;
 - Frequency of encounters with LEP language groups;
 - The nature and importance of activities to LEP persons;
 - The availability of resources, including technological advances and sources of additional resources, and the costs imposed;
 - Whether existing LAP is meeting the needs of LEP persons;
 - Whether staff understands the LAP and how to implement it; and
 - Whether identified sources for assistance are still available.

G. LANGUAGE ASSISTANCE OPTIONS

STPG will offer the opportunity for meaningful access to LEP clients. If a client asks for language assistance, or if staff identifies a client who needs assistance, STPG will make reasonable efforts to provide free language assistance. The following options are used for providing language services:

1. Oral Interpretation Services

- *Staff/In-House Services*

Quality oral interpretation services will be provided to all LEP persons in some form. Depending on the circumstances, reasonable oral interpretation assistance might be offered through a bilingual employee or family member or telephone service line. It is the LEP person's decision whether to use family members or friends as interpreters. Extra caution will be exercised when the LEP person chooses to use a minor. STPG will ensure that the LEP person's choice is voluntary, that the LEP person is aware of the possible problems if the preferred interpreter is a minor child, and that the LEP person knows that STPG will provide a competent interpreter at no cost to the LEP person. No adverse action would be taken using a child (anyone under the age of 18) as an interpreter.

- *Outside Services*

When interpretation services are needed, STPG will first attempt to provide services using qualified bilingual employees or a Language Line Services/telephone service line as noted above. When qualified bilingual employees are unavailable, or when qualified bilingual employees lack the skills to provide reasonable and timely oral interpretation assistance, STPG will provide services using Language Line Services.

2. Written Interpretation Services

- *Vital Forms and Documents*

Using the four-factor analysis, STPG will identify the particular languages most frequently encountered by LEP persons. Vital documents and most commonly used forms will be translated into the identified languages. The use of "tag lines" on other correspondence will be used to advise recipients to contact STPG if they cannot read the English document. STPG will maintain a list of at least three document translator service providers who will be contacted for quotes if the need arises.

3. Deciding Which Language Assistance Option to Use

The types of language assistance resources STPG decides to use will depend on the four-factor analysis and may be different in different types of activities. For more rarely-encountered languages, telephonic or contract interpretation may be a preferred option. Contract language assistance vendors will sign a Confidentiality Agreement in accordance with STPG's Information Security Plan.

H. PERSONNEL/HUMAN RESOURCE PLANNING

The LAP for management includes planning on personnel and human resource matters, such as:

- Consideration of language needs and inclusion of second language skills in recruitment, hiring, and promotion plans and criteria.
- Informing new employees of STPG's duty to offer free language assistance in compliance with Federal requirements.

I. TRAINING

Training is critical so that staff understands how to access language services and so that those staff involved in actually providing the language services are competent to do so. Initial and periodic training will be conducted for staff coming into contact with LEP persons. Training will include:

- How to respond to LEP callers.
- How to respond to written communications from LEP clients.

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- How to respond to LEP clients who contact STPG in person.
- Which staff and outside vendors are available for interpretation at appointments.
- The location of translated documents.

J. MONITORING

The agency will monitor LEP compliance by:

- Setting forth clear expectations for staff and managers regarding language assistance.
- Implementing a system to monitor effectiveness of the LAP and its implementation.
- Seeking feedback on the quality and effectiveness of the language service resources available and utilization by staff
- Reviewing programs and the language resources available at least once per year (or as appropriate) and making adjustments as necessary and appropriate to ensure meaningful access and to reflect improved approaches to providing language access.

K. LANGUAGE ASSISTANCE MEASURES AND INTERNAL CONTROLS

The following procedures will be used to provide language assistance:

1. Telephone Communication

Callers who are limited English proficient often have an English speaking person present when they call.

- Ask that English speaking person to identify the language need of the caller.
- Contact a supervisor who will arrange for translation services at an agreeable time for all parties.

2. Written communication

Contact a supervisor who will arrange for translation of the document.

3. Walk-ins Needing Translation Services

Identify the language service required. Contact a supervisor who will arrange for translation services at an agreeable time for all parties. A notice to advise LEP clients of their right to an interpreter free of charge will be posted at the front desk and in the conference room.

The Supervisor/Department Director will:

- Access foreign language interpreters/translation services through either an employee or Language Line Services' toll free number.

If the translation cannot be provided immediately over the phone or if a provider must be procured, the Supervisor/Department Director will:

- Solicit quotes from the Parish's LEP Provider List
- Negotiate an hourly rate for services required.
- Have the translator sign a confidentiality agreement.
- Arrange a date and time for the translation to take place.
- Arrange for payment of services rendered.

L. LANGUAGE COMPLAINT PROCESS

LEP individuals wishing to file a grievance or complaint with STPG should contact the LEP Coordinator. The LEP Coordinator will report the complaint to the Jeanne Betbeze (Director of Grants Department). A

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written response to the individual will be made within 15 days. The individual has 10 days to respond to the notice of decision.

LEP individuals can file a discrimination complaint in accordance with federal regulations. Informing a client of their right to file a discrimination complaint is contained in various program materials. Other languages are available on the HUD website.