**Hennepin County**

**Limited English Proficiency Plan**

**Human Services & Public Health Department**

**Hennepin County Government Center**

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# LEGAL BASIS AND PURPOSE

This document serves as the plan for Hennepin County to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR 273 et seq.; and 42 CFR 435 et seq.

This document also serves as a model to show Hennepin County’s commitment to provide meaningful access to all individuals accessing any of the services provided. At all times, non-English speaking residents will be guaranteed assistance by all service areas within the county.

A notice to Limited English Proficiency (LEP) residents was sent out by the Minnesota Department of Human Services in April of 2001 informing them of their right to a free interpreter. LEP individuals are informed of the availability of free interpreter and translation services when it appears that the individual is not able to communicate effectively in English. Such services are provided during all normal business hours and when an emergency has been determined to exist during non-business hours. Notice of availability of free interpreter services also occurs in revised signage at primary points of contact for each service’s reception areas.

At no time shall a Hennepin County employee or contractor indicate – either verbally or in writing – that any LEP applicant or resident accessing County services will be charged for interpreter or translation services.

Dissemination of the LEP Plan occurs via many routes. All individuals, including area Legal Aid offices, contractors with Hennepin County and community partners, are able to access the plan on the internet. All Hennepin County employees have access to it via the county’s SharePoint site and through meetings and training sessions. A copy is also posted on the county’s Office of Multi-Cultural Services’ website for public review. LEP individuals can obtain copies/translations upon request.

Further questions regarding this plan and its implementation may be directed to:

Limited English Proficiency Manager

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**BACKGROUND**

In 1999 county administration responded to the increased need for culture- and language- specific services by implementing the Project for Multi-Cultural Service Delivery (now renamed the Hennepin County Office of Multi-Cultural Services) which provides a central point of access for county services to refugees, immigrants and other new American populations. While the Office of Multi-Cultural Services can meet the needs of many new Americans, the demand for services is too great across many immigrant groups to be able to respond adequately. Hennepin County is therefore reliant on the programs, processes and staff in all service areas, to provide adequate assistance to these populations.

In March of 2000, Hennepin County engaged in a comprehensive assessment of the LEP populations residing within the county, the current services in place to meet the needs of our LEP populations and the availability of spoken language interpreters and translated documents. Hennepin County has also reviewed its signage across all service areas, as well as how well staff and LEP residents understand the right to free language services.

**The Hennepin County Limited English Proficiency Plan** sets forth the policies and procedures for ensuring equal access to linguistically appropriate services for persons residing within the county as well as a process to address issues of training for county staff and contracted providers and the use of appropriate signage.

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# LANGUAGE ASSISTANCE RESOURCES OFFERED

### Limited English Proficiency Populations Being Served

Hennepin County’s service areas utilize a variety of databases to track and record language data. The utilization of the MAXIS system is one such source as are MMIS, SSIS, PRISM and other individual department systems. However, identifying common LEP populations is a difficult task which has required that the county look at a variety of mechanisms to examine our LEP populations and determine the need for language services.

The State of Minnesota identified the fifteen largest LEP populations as the following: Amharic, Arabic, Burmese, Cantonese, French, Hmong, Karen, Khmer (Cambodian), Korean, Laotian, Oromiffa, Russian, Somali, Spanish and Vietnamese, but does not differentiate between the size of each population group. We utilize current bilingual staff and interpreters from these language groups to facilitate transactions within the staff person’s service area and across all county departments whenever possible. In the event that an area does not have on-site assistance for all of the fifteen language groups identified above, contracted interpreter services are used to meet the language need. For all other language groups, Hennepin County utilizes its current contracted interpreter agencies for services. A list of contracted interpreter agencies can be found on file at the Office of Multi-Cultural Services or on their internet site:

[**hennepin.us/residents/human-services/multi-cultural-services**](http://www.hennepin.us/residents/human-services/multi-cultural-services)**.**

# PROCEDURES TO ACCESS LANGUAGE ASSISTANCE

### Means of Providing Interpretive Services

Hennepin County currently employs a workforce of approximately 8,000 individuals, many of whom are bilingual. While not all bilingual staff speak one of the fifteen language groups identified in the LEP Assessment, many areas have a host of bilingual staff available to meet the needs of our LEP residents. While there is no current process in place to ensure that individual county areas share bilingual and interpretive resources with others, many language issues can be bridged by utilizing staff at the Office of Multi-Cultural Services and contracted interpretive services.

Hennepin County continues to develop criteria specific to the individual service areas as to the best methodology for utilizing the skills of bilingual staff as workload demands often prevent them from assisting with language needs for other service area personnel. The protocol to be followed by all county service areas for accessing bilingual services is outlined below.

1. **Use of bilingual staff:** Each department will be provided a list of all staff persons within their service areas that have been certified as bilingual through the Human Resources Department testing process. *Due to the constantly changing workforce composition and requests for employees to work outside of their assigned worksites and workload issues, these lists change frequently. Hennepin County remains committed to providing this material in the timely manner – through use of department-wide e-mail and/or information posted on the county’s SharePoint site.* The LEP Manager will request an ongoing, annual bilingual-staff report which will be used to update the list of certified bilinguals working for Hennepin County.
2. In the event that an insufficient number of bilingual staff are available to assist with spoken language needs, staff and/or contracted interpreters for that service area are to be accessed for services for these language groups. As not all areas have sufficient bilingual staff members, the protocol may vary from department to department.
3. The use of volunteers, students and interns who have been through the language testing process offered through Human Resources are made available to work with county staff to meet the language needs of the county’s LEP populations. This group of individuals is constantly changing. Hennepin County remains committed to providing this material in the same timelymanner in which it has provided it in the past – through use of department-wide e-mails and/or information posted on the county’s SharePoint site. If a volunteer, student or intern has not been tested and determined to be competent by Human Resources, they will not be eligible to provide language services.
4. Upon identifying a language need that cannot be met by utilizing staff in steps 1-4 above, county staff will access one of the Hennepin County-contracted interpreter service agencies for that department. Staff are to be provided a list of available contracted interpreter service agencies and rates. This list has already been made available for staff via SharePoint. Staff may utilize any contracted interpreter service agency on this list in order to meet the language needs of the LEP resident.
5. AT NO TIME WILL FRIENDS OR FAMILY MEMBERS OF THE LEP RESIDENT BE UTILIZED TO PROVIDE INTERPRETER SERVICES, EVEN IN THE EVENT OF AN EMERGENCY. IF THE RESIDENT INSISTS, BILINGUAL STAFF WILL INFORM THEM THAT THEY ARE UNABLE TO ACCOMMODATE SUCH A REQUEST.
6. In the event that no resources for spoken language interpretation can be secured through the above process, staff shall immediately notify the county’s LEP Manager who will work to secure the resources necessary to meet the language needs of the LEP resident.
7. When confronted with a situation in which the resident is illiterate – cannot read or write in their language – staff, with the help of an interpreter, will assist the LEP individual in the completion of necessary forms and documents. Preferably, a bilingual staff member will assist, but if that is not possible, an interpreter from a contracted agency will be utilized.
8. When LEP individuals require access to services within short time frames, Hennepin County personnel – in consultation with a supervisor or manager – will take whatever steps deemed necessary to ensure that LEP residents have access to services within the appropriate time frame. The county’s goal is to make its services accessible to all LEP persons within the required time frames, whether that means using an interpreter or other appropriate type of language assistance.

Hennepin County also utilizes translated forms to assist in applicant/resident interactions and communications. Forms translated by the State of Minnesota Department of Human Services can be found by accessing their website at [mn.gov/dhs/general-public/publications-forms-resources/edocs/index.jsp](http://mn.gov/dhs/general-public/publications-forms-resources/edocs/index.jsp). Caserecords will continue to be updated to reflect the resident’s preference for translated materials. County employees are responsible for providing available translated forms at appropriate times. Applicants are asked for their preference of language prior to being given English-only forms. If the LEP individual is unable to complete the necessary forms because they are unable to read/write in their own language, the county employee will ensure that the LEP individual is provided assistance by a bilingual county employee or contracted interpreter.

### Maintenance of Lists and/or Directory of Bilingual Staff

Tracking of the total number of bilingual staff on a countywide basis is performed by utilizing information from the county’s Payroll and Accounting Department which identifies those individuals who receive a bilingual stipend. The Hennepin County LEP Manager will request a list of bilingual staff members annually and update the list on SharePoint. The same information will be shared with assigned service area contacts throughout the county. This practice will allow staff members to identify language resources within their respective service areas.

Language resources relevant to the entire county are stored on the Office of Multi-Cultural Services’ SharePoint site. This arrangement allows for staff across county service areas to have easy access to the information, which is maintained and updated by the LEP Manager.

### Rules Governing Interpreters and Bilingual Staff

In September of 1999, Hennepin County convened a group to begin looking at developing standards for interpreter services that would impact all county departments. An interim report published in October of 2000 makes recommendations for the development of a set of countywide standards for any person doing interpreting in any county service area. The Interim Report of the Interpretive Services Subcommittee outlined recommended ethical and competency standards, as well as guidelines for working with any person providing interpreter services. (Attachment D).

These recommendations led to the development of a curriculum designed to train anyone doing interpreting in the delivery of county services on the ethics and competencies of providing language assistance. Training sessions have been conducted periodically since 2004. It is the expectation that all Bilingual Staff, Staff Interpreters, Intermittent Staff Interpreters, Volunteers, Students and Interns who work with LEP populations complete this training when it becomes available. The LEPManager will be working to update the training material. Once the updates are completed, the sessions will be made available on APEX for bilingual staff to register and an announcement will be made prior to each session via the *In the Loop* weekly emails.

**Ensuring Interpreter Competency**

In the interest of ensuring consistent standards for all individuals who provide language assistance in the delivery of county services, the following requirements have been set.

1. Proficiency certification in the English language is required for staff in an interpreter job class – conducted by the HR Department.
2. Proficiency certification in the non-English language – conducted by the HR Department
3. Proficiency certification in the county’s “Business Lines” vernacular, systems, procedures, policies and practices – conducted by the hiring service area.

The Human Resources Department recognizes county staff members that have been tested for spoken and written language skills as “bilingual”. Bilingual staff members receive a stipend for utilizing their language skills in meeting the needs of LEP populations.

**Rules for Contracted Interpreters**

Hennepin County utilizes contractual language to ensure that outside vendors are bound by the legal requirements of the OCR Guidance Memorandum. Part of the assessment includes the review of training standards of contracted interpreters. All interpreting agencies contracted with the county are required to demonstrate that the interpreters they employ receive training in the ethics and competency standards of interpreting comparable to that which is utilized by HC. In addition, agencies are required to ensure that their interpreters have been tested on their language proficiency. The LEP Manager makes visits to these agencies on an as-needed basis to review their training and testing methods and how they recruit and retain interpreters.

As it stands, contracted interpreters are expected to adhere to the ethics and competency standards employed by Hennepin County. Options for training include inviting contracted interpreters to attend the orientation developed by the Interpreter Training Committee or encouraging them to attend classes offered by the University of Minnesota.

Service providers who are contracted with Hennepin County as business associates are encouraged to buy interpreter services from the county’s contracted interpreter vendors, as they may receive a better rate for the interpreter services through these agencies

**Scheduling Interpreter Services**

Due to the fact that each service area has the best information on the individual LEP populations accessing or in need of its services, a universal plan to coordinate interpreter services cannot be established. Departments will, however, follow the existing protocol for securing interpreter services. When an LEP resident requests county services and no bilingual staff or county interpreters are available to provide language assistance, then staff will contact an interpreting vendor who has been contracted with the county to provide services.

**Document Translation**

The need for assistance in the application process for many Hennepin County programs poses some unique challenges. While the county employs staff with the ability to assist in these functions, they are not able to cover all language needs in all locations. While many application forms and critical documents are available in translated format, low literacy rates in some LEP populations, a lack of translated materials in all languages and a lack of translated information on such topics as program eligibility, income and asset limits present additional challenges to county staff.

Hennepin County also continues to work with the Minnesota Department of Human Services, the Minnesota Department of Health and other state and federal agencies to identify the availability of translated documents. Copies of all translated documents are made available upon request.

### Signage

The LEP Plan also takes into account physical signage and spatial considerations so that interactions between county staff and LEP residents can take place in a private and confidential manner. This includes interactions with persons who may be Deaf/Hard of Hearing and/or Blind/Low Vision.

The LEP Plan sets the expectation that all entry points have posted signage that informs all residents of their right to free interpreter assistance in the fifteen languages. The LEP Manager continues an on-going process of assessing all entry points to ensure appropriate signage is posted by reevaluating access points identified in the initial assessment, as well as determining new points where LEP populations access county services.

This Plan serves as a guide for Hennepin County to plan, develop and implement a strategy for posting appropriate signage in the fifteen languages identified by DHS in a uniform and consistent manner. The assessment has also allowed the county to identify other growing LEP populations who access its buildings and services. Hennepin County assesses future needs by conducting yearly estimates of new LEP populations to see if they meet the critical mass numbers as identified by DHS and if new signage in new languages is needed.

It should also be noted that some service areas have taken it upon themselves to initiate creative and innovative ways to provide signage which takes into account colors, international signs and numbers to help residents find their way around.

**Privacy Issues**

Most service areas provide office space or interview rooms for interacting in person or conducting conference calls with residents, in a private and confidential manner.

Hennepin County staff – including bilingual staff, volunteers and contracted interpreters working with residents - sign a data privacy oath. Violations of this oath are dealt with strictly and severely. Hennepin County staff who work directly with residents undergo annual data privacy training to ensure they understand the importance of maintaining confidentiality. Hennepin County will continue to provide space for staff working with interpreters to conduct interviews in a safe manner that respects the privacy and confidentiality of residents.

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### Deaf/Hard of Hearing and Blind/Low Vision Clients

Hennepin County offers its English-speaking residents hearing aids and large printed material where possible.

The county employs an American Sign Language (ASL) interpreter for all residents who are English-speaking and Deaf/Hard of Hearing. To supplement this service, the county has also contracted with an ASL interpreter agency to provide ASL interpretation coverage during busy days, after-hours, weekends and holidays.

The Hennepin County LEP Manager will explore whether other forms of sign language exist that may be used by the fifteen LEP populations identified by DHS. If suchlanguages exist, Hennepin County will use contracted interpreter agencies to provide this service.

**CONSISTENCY IN THE DELIVERY OF SERVICES**

When Hennepin County representatives were asked to conduct departmental assessments of the needs of LEP residents, many put themselves in the place of the residents and “walked through” the experience. The next few sections address how residents and staff first assess and meet language needs.

### Procedures for Documentation

Hennepin County staff are trained on the following procedures and documentation requirements to ensure a consistent and efficient delivery of services to individuals from the LEP community:

* Offer of Interpreter Service (Attachment A) – All LEP individuals will be informed of their right to free interpreter services or translated documents by Hennepin County Staff. The staff member will document the offer by making a detailed case note and keeping any signed forms in the resident’s electronic case file.

### Check List (Attachment C) – Hennepin County Staff should refer to this checklist when working with an LEP resident to ensure the proper procedures have been followed.

The Hennepin County staff member should:

1. Determine point of contact
2. Offer free interpreter services
3. Understand protocol to obtain live, agency or remote interpreter
4. Determine whether the resident needs audio and/or visual aid(s) or an ASL interpreter
5. Obtain name of staff interpreter, contracted agency and interpreter or remote interpreter who provided language assistance
6. If a resident refuses a free interpreter, document in the case that an interpreter was offered and the interpreter was refused. Do not conduct an interview or interaction without assistance of a county bilingual staff member or contracted interpreter UNDER ANY CIRCUMSTANCES. Any exceptions to this requirement must be authorized by the LEP Manager only.

### Responsibility of Documentation

The responsibility of documentation lies with the county staff member working with the resident. However, all staff members working as first points of contact should understand the importance of determining the language needs of members of LEP populations in a timely manner. This will reduce delays, frustration, costs and possible liability issues.

Standardization of the methods and forms regarding the offer for free interpretive services across all county departments, alleviates the confusion and delay when working with members of LEP populations.

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### Initiating an Offer for Free Interpreter Services

The LEP Plan has identified the educating of staff on cultural competency, as an important component for working with LEP populations. The Cultural Speaker’s Bureau, organized by staff from the Office of Multi-Cultural Services, hold cultural presentations throughout the year. Volunteer staff members from the various cultures living in the county, create and present the information to other interested employees from all service areas to help them become familiar with the different groups of LEP populations accessing the services they help provide.

Free interpreter services are offered in the following situations but are not limited to these events. An LEP resident may:

1. Present an “I Speak” card
2. Point to a language on the poster created by DHS that offers free interpretive service in fifteen languages
3. Be accompanied by a friend who tells staff that the resident needs an interpreter
4. Exhibit confusion or a lack of understanding
5. Be accompanied by representatives from Mutual Assistance Associations (MAA) or Community Based Organizations (CBO)

### Identifying the Need for an Interpreter

In addition to the methods stated above, county staff continue to be educated in identifying individuals who might misrepresent their understanding of the English language. All staff members are asked to access an interpreter if they feel that the resident does not fully understand what they are trying to communicate. They then use the procedures checklist for documenting the need for an interpreter. Thisprocedure protects both the resident, the staff member and the county from any potential liability issues.

The preferred method of ensuring that the needs of LEP populations are being met is to continue hiring and retaining bilingual/bicultural staff who are able to hold conversations with residents in their preferred language to determine their needs, though this isn’t always possible.

### Offers to All or Some Groups of Limited English Proficiency Populations

Using the procedures outlined in the LEP Plan, county staff will offer free interpreter services to *all* members of all LEP populations who are limited in their ability to speak or understand English. As stated above, some residents may misrepresent their ability to speak and/or understand English, but in order to protect them, county staff and Hennepin County, interpreter services must be offered. It is important to note that a number of countries that were colonized by the English, speak a hybrid language peppered with English words, but that technically is not a recognized language by itself. Such residents will be provided language assistance if the staff member and/or the resident feel that it would benefit the interaction.

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### The Limited English Proficiency Individual Bill of Rights

### The Limited English Proficiency Individual Bill of Rights is included with the LEP Plan as (Attachment B).

### ASL Guidelines and Standards

As part of the draft recommendations put forth by the Interpreter Services Subcommittee, the guidelines and standards utilized by ASL interpreters were referred to and adopted as general ethics and competency standards for all interpreters, where applicable.

### Use of Family and Friends as Interpreters

At no time will family members or friends of the LEP resident be utilized to provide interpretive services, even in the event of an emergency. A family member or friend is not competent to act as an interpreter because they may not be proficient enough in both languages, may lack training in interpretation and will not be familiar with specialized program terminology. The resident does not have the choice of using their own interpreter. County staff members working with someone insisting on usingtheir own interpreter, will contact a county bilingual employee or contracted vendor who can explain this to the resident clearly in their own language.

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# TRAINING

An important component of the Limited English Proficiency Plan is the educating of all Hennepin County staff who come into contact with LEP residents. The next few sections describe the process that will be taken in addressing the issue of training.

### Training of Staff in Accordance with OCR Guidance

Hennepin County and their contracted agencies remain committed to providing a full range of services to all individuals who are eligible, regardless of their English language capabilities. Hennepin County has worked extensively on an education component to develop the skills and diversity of their employees. Hennepin County continues to be committed to educating employees on the effective delivery of services to LEP individuals by implementing the following plan.

### Distribution of the LEP Plan to Agency Staff and Contracted Services

Hennepin County distributes the Limited English Proficiency Plan by making the Plan available to staff on the county’s intranet SharePoint site. Hennepin County has also placed the plan on its external website for all interested persons to review.

The Limited English Proficiency Plan will continue to be posted on the Hennepin County SharePoint site in order to quickly and effectively disseminate this information to staff. Hennepin County supervisors and managers are responsible for pointing out to staff that the LEP Plan can serve as a useful tool for learning about LEP protocols. However, managers and supervisors should always contact the LEP Manager for additional guidance on such matters. This distribution is designed to be a precursor to any future training for staff who have contact with LEP individuals.

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### Training of Current Staff

Due to the size and complexity of Hennepin County’s workforce, several training options are available.

1.**Formal Training** – This face-to-face training is not currently being offered by the county’s HR Department. The material and information is being reviewed by the LEP Manager to bring it up to date. Once it is available, this course will be formanagement, supervisors and staff who are likely to have contact with LEP individuals. It will include the basics of the Hennepin County Limited English Proficiency Plan, the obligations of Hennepin County to provide interpretative services and how to effectively utilize the interpreter and understand the dynamics between the resident, provider and interpreter.

**2. Computer Based Training** – Hennepin County offers a computer-based training covering the guidelines for working with an interpreter. At this time, the LEP Manager is reviewing the information in this training and it will be updated to reflect current policy and procedures for the use of interpreter services in direct resident interactions. Once finalized, this training is strongly recommended for all Hennepin County employees who provide direct services to residents. The training will encompass:

* The significance of the Hennepin County Limited English Proficiency Plan and associated obligations and protocols;
* The process for accessing and utilizing interpreters;
* Guidance for understanding the dynamics of an effective interpreting exchange among resident, provider and interpreter.

3. **Informal Education** – All other individuals who are not likely to have contact with LEP persons are required to receive information covering the basics of the Hennepin County Limited English Proficiency Plan and the obligations of the plan. This training will be conducted by designated staff members within the service area with help from the LEP Manager, as requested.

**Training of New Staff**

The Hennepin County Human Resources Department and Limited English Proficiency Manager will work with the respective service areas on ways to orient new employees and volunteers to the Hennepin County Limited English Proficiency Plan. It is assumed that all newly hired employees are likely to have contact with LEP residents. Every effort will be made to ensure that staff are oriented to the LEP Plan in the first few weeks of employment as the employee goes through the general county orientation process.

### Continuing Education

The Limited English Proficiency Manager will work with Human Resources on an as-needed basis to provide updated information to Hennepin County staff with regard to the Limited English Proficiency Plan.

### Contracted Vendors

All Hennepin County contracted vendors receive a written copy of Hennepin County’s Limited English Proficiency Plan. Language to ensure compliance with this plan is written into new contracts. Contracts already in effect may be re-negotiated in order to add Limited English Proficiency compliance language. Vendors are responsible to provide training for their employees, unless Hennepin County agrees otherwise. Individuals/providers who are involved in any type of Child Care Licensing activity are acting as independent businesses and as such are not eligible for LEP services.

# Vigilant Monitoring

A necessary and crucial part of the Limited English Proficiency Plan is monitoring, assessment and evaluation. For this reason, vigilant monitoring procedures are in place to help the LEP Manager assess and evaluate the success of the plan. The next few sections address this topic.

### Limited English Proficiency Manager

Hennepin County has identified one person who will serve as the Limited English Proficiency (LEP) Manager for the county. The primary responsibilities of this individual include:

* Implementation of the LEP Plan across all departments and service areas within Hennepin County.
* Work with appropriate staff to develop tools for evaluating the effectiveness of the Hennepin County LEP Plan, compliance with LEP protocol for accessing interpretive services and obtaining resident and community input regarding the overall effectiveness of the LEP Plan.
* Work with the Office of Budget and Finance to identify resource needs within county departments.
* Serve as the central point of contact to address compliance concerns from LEP populations residing in Hennepin County.
* Assist with the implementation of universal signage strategies across Hennepin County departments.
* Conduct annual monitoring of all Hennepin County access points where LEP populations are likely to be encountered to ensure adherence to the LEP Plan and the LEP protocols for securing language services.

**Evaluation of the Limited English Proficiency Plan**

On an as needed basis, the LEP Manager may coordinate

* An assessment of the number of persons with limited English proficiency in Hennepin County. This information can be collected with the assistance of the State Department of Human Services and from other community agencies (i.e. school systems).
* An assessment of current language needs of applicants and residents with limited English proficiency. Case files may be reviewed to determine if the resident needs an interpreter and/or translated materials to communicate effectively. Questionable situations can be resolved by clarifying the resident’s language needs at recertification.
* A determination of whether existing assistance is meeting the needs of applicants and residents with limited English proficiency.
* An assessment of whether staff members understand agency and county LEP policies and procedures and how to carry them out. Assessment of the language resources and arrangements for those resources to ensure that they are current and accessible may also occur.
* Feedback may be requested from non-English or LEP communities in the service delivery area, including applicants and residents, as well as community organizations and advocacy groups working with non-English or LEP communities.

### A Suggestion Pathway

The LEP Manager will ensure that any pathway used to provide any person requesting service from the county with the opportunity to suggest general process and quality improvement corrections, includes a method for determining which suggestions were of an LEP nature. Suggestions identified as LEP resident service issues will be forwarded to the LEP Manager, who will then follow up with the unit manager and individual.

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### A Complaint Pathway

There is a complaint process in place that is applicable to all areas within Hennepin County and accessible to LEP residents from any language/ethnic/cultural group. County residents are able to voice concerns regarding specific incidents of poor customer service, including the quality and timeliness of interpreter services. If any of the issues involve federal/state-protected classes and possible violations of the Hennepin County Diversity and Non-Discrimination Policy, management will consult with the Hennepin County Human Resources Department EEO/AA Director for guidance and possible commencement of a formal investigation may follow.

Complaints concerning county interpreter services are forwarded directly to the LEP Manager. The LEP Manager reviews the complaint, conducts interviews with all parties, recommends a course of corrective action and reports the findings to the LEP program management and county EEO/AA Director. Corrective action may include additional training for staff, staff reassignment or process improvement strategies.

The LEP Manager has developed a pathway in which customer concerns can be filed. A number of different methods are available including:

* A formal, written, Customer Concern Form, available in various locations throughout the county – The customer may return the form to the county staff member who served them with the expectation that the form will be reviewed by the department or area who will address complaints or suggestions. This evaluation form is available as Attachment E. Additionally, the forms could eventually be made available online and at neighborhood agencies and community group locations throughout the county.

### Tracking and Reporting

Using data gathered from the Customer Concern Program, the LEP Manager continues to track the occurrences and look for trends. Serious, negative trends in a service area will trigger an immediate report to the department’s management for their review and action. Concerns identified on a countywide basis will be reported to county administration for their review and possible action. As requested, the LEP Manager will produce and present reports to county leadership for their review and consideration.

**Offer of Free Language Assistance Services**

Attachment A

**All Limited English Proficiency residents must be informed of their right to free language assistance including interpreter services and translated documents. This form can be kept in the resident’s electronic case file for future reference. County staff must never allow a Limited English Proficiency resident to use friends or family as interpreters under any circumstances unless authorized by the LEP Manager.**

|  |  |  |  |
| --- | --- | --- | --- |
| **Department or Area:** | | **Name of Staff Person:** | |
| **Name of Resident(s):** | **Date of Visit:** | |  |
| **Reason for Visit:** |  | | |
|  |

**Was language assistance needed? (please circle) YES NO**

**Resident’s Preferred Language (please circle):**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Amharic** | **Arabic** | **Bosnian** | **Hmong** | **Khmer** | **Lao** |
| **Oromo** | **Russian** | **Somali** | **Spanish** | **Vietnamese** | **Other\_\_\_\_\_\_\_\_\_\_\_** |

|  |  |
| --- | --- |
| **Who assisted with this interaction?** | |
| **Name of Bilingual Staff Member:** | **Name of Staff Interpreter:** |
| **Name of Contracted Agency:** | **Name of Contracted Interpreter:** |
| **Name of Remote Agency:** | **Name of Remote Interpreter:** |
| **Duration of Interpreted Session:** |  |

Attachment B

**The Limited English Proficiency Individual Bill of Rights**

**Every Limited English Proficiency Individual has the right**

1. **to meaningful access of services through the provision of timely, effective language assistance free of charge.**
2. **to be treated with courtesy and respect and in a manner that respects the person’s dignity and privacy and promotes independence.**
3. **to be treated in a manner which is sensitive to their needs and preferences, and ethnic, spiritual, linguistic, familial and cultural factors.**
4. **to be free from discrimination, abuse and harassment by the service provider or agency.**
5. **to have critical information about the services provided and who will be providing the service, communicated in their language – either written, orally or visually.**
6. **to participate with the service provider or agency in the assessment of needs, development of a plan of service, reassessment, evaluation and revision of a plan of service with the aid of a competent interpreter or bilingual staff member.**
7. **to be informed in their language of the possible outcomes by accepting or refusing services.**
8. **to raise concerns about or recommend changes to the service provided without fear of interference, coercion, discrimination or reprisal.**
9. **to be informed in their language, of laws, rules and policies affecting the operation of the service provider.**
10. **to be informed in their language, of their rights and responsibilities when utilizing services.**
11. **to be informed in their language, of the procedures for initiating compliance concerns about the service provider or agency.**
12. **to have their records and interactions with the service provider or agency kept confidential in accordance with the law.**

**Attachment C**

**Limited English Proficiency Checklist**

**When working with a member from a Limited English Proficiency population, always check to see if the following procedures have been followed:**

* **Determine point of contact.**
* **Offer free interpreter services.**
* **Understand protocol to obtain live, agency or remote interpreter.**
* **Check if the resident needs audio and/or visual aid or a sign interpreter.**
* **Always obtain name of staff interpreter, contracted agency and interpreter (or remote interpreter).**
* **If the offer is rejected and the staff member deems that interpreter assistance is needed or the resident insists on using a friend or family member, contact a bilingual staff member or certified interpreter who can explain this requirement to the resident clearly in their own language.**
* **Under no circumstances are staff to allow the use of a family member, friend or advocate, as interpreter.**
* **Any exemptions to the above procedures must be authorized by the Limited English Proficiency Manager.**

**Attachment D**

**Countywide Standards for Persons Providing Interpreter Assistance in the Delivery of County Services \***

|  |  |  |
| --- | --- | --- |
| **ETHICAL STANDARDS** | **INTERPRETING COMPETENCY STANDARDS** | **GUIDELINES FOR WORKING WITH AN INTERPRETER** |
| * **Confidentiality: All Information divulged by anyone in any interpreted exchange is strictly confidential. The person doing the interpreting may reveal information only IF required to by current law or rule.** * **Accuracy: Any person doing the interpreting is expected to transmit the content and spirit of the original language into the other language without omitting, modifying, condensing or adding. If there are problems or misunderstandings with interpreting any information, the person interpreting must advise everyone involved.** * **Impartiality: Any person doing interpreting refrains from interjecting personal opinions or biases into the exchange. They will withdraw from assignments or situations where personal opinions or biases may affect their impartiality.** * **Conflict of Interest: Any person doing interpreting shall inform all parties if they have a real or perceived conflict of interest and they shall remove themselves from the interpreting situation. They do not need to disclose the nature of the conflict of interest.** * **Maintains professional distance: Any person doing interpreting understands the boundaries of their role and refrains from becoming personally involved in the situation.** * **Knows Own Limits: Any person doing interpreting declines to interpret beyond their training, level of experience and skills.** | * **Self-Introduction: Any person doing interpreting will introduce themselves to all parties involved and explain their role.** * **Self-Positioning: Any person doing interpreting will position themselves to best facilitate communication amongst all parties, unless otherwise directed. Speak “loud & clear” so that all parties can hear clearly.** * **Communicate all parties’ content & feelings: Any person doing interpreting shall communicate the content and emotions expressed by all parties.** * **Speak in First-Person: Any person doing interpreting shall speak in the firstPerson when communicating for both parties. That is, use “I” in reference to the speaker rather than “they said”.** * **Speak in Appropriate Mode: Any person doing interpreting shall use consecutive or simultaneous interpretation mode as appropriate to the situation.** * **Understand Content: Any person doing interpreting will ensure that they understands the message to be transmitted by seeking clarification, as needed, from either or all parties.** * **Remains Neutral: Any person doing interpreting must remain neutral by reminding all parties of their ethical obligations to be impartial, to be accurate, to maintain professional distance and avoid any conflict of interest.** * **Self-Monitoring & Correction: Any person doing interpreting checks the accuracy of their own interpretation. They identify and correct any misinterpretation for all parties.** * **Cultural Brokering: Any person doing interpreting shares relevant cultural information with all parties involved and assists all speakers in reaching a mutual understanding.** * **Manage the Flow of Communication: Any person doing interpreting will manage the flow/pace of communication to preserve the accuracy and completeness of all parties’ communications.** * **Complete Appropriate Documentation: Any person doing interpreting will complete appropriate documentation as required.** | * **Speak Directly to the Limited English Proficiency (LEP) person, not to the interpreter.** * **Don’t say anything that you do not want interpreted.** * **Use words, not gestures, to convey meaning.** * **Speak slowly, clearly and in a normal tone.** * **Use simple vocabulary to express your meaning.** * **Explain jargon and technical terms as necessary.** * **Speak in short simple sentences, pausing to permit the interpretation.** * **Ask one question at a time.** * **Allow the interpreter to stop you and seek clarification when necessary.** * **Expect the interpreter to take notes if things get complicated.** * **Be prepared to repeat yourself in different words if your message is not understood.** * **IF you suspect that your message is not fully understood by the interpreter, double check to see if they understood the message.** * **IF you suspect that your message is not fully understood by the Limited English Proficiency (LEP) individual, double check to see if they understood your message; e.g. “Tell me what you understand”.** * **When using bilingual staff for interpreting, DO NOT ASK them to perform functions related to their regular job.** |

**\*Applies to all Bilingual Staff, Staff Interpreters, Contracted Interpreters, Bilingual Backup Staff, Telephone Interpreter Services and Volunteers. Updated 01/2020**

**Attachment E**

**PLEASE COMPLETE THIS FORM ABOUT YOUR COUNTY EXPERIENCE**

**Hennepin County wants to provide the best possible service to Limited English Proficiency individuals. Please help us to keep improving by telling us about your experience.**

1. **Please rate the following (Check the Number):**

**1 = Poor 2 = Fair 3 = Good 4 = Excellent**

* 1. **County personnel were courteous and respectful.**

**\_\_1 \_\_2 \_\_3 \_\_4**

* 1. **I was informed of my right to free interpreter services promptly and efficiently.**

**\_\_1 \_\_2 \_\_3 \_\_4**

* 1. **The language assistance (interpreter and/or translated documents) were provided in a timely manner.**

**\_\_1 \_\_2 \_\_3 \_\_4**

* 1. **The interpreter service provided was appropriate and helpful during my interaction with the County employee(s).**

**\_\_1 \_\_2 \_\_3 \_\_4**

* 1. **The translated documents (if used) were appropriate and useful.**

**\_\_1 \_\_2 \_\_3 \_\_4**

* 1. **My county business was handled promptly and efficiently.**

**\_\_1 \_\_2 \_\_3 \_\_4**

1. **Do you have any feedback or complaints about the language assistance services that the county provided for you? (This information will be used to help improve our language assistance services):**

**When completed, this form should be sent or faxed to the Department manager or the Limited English Proficiency Manager who will review it and take any steps necessary to address complaints or concerns in a continuing effort to improve the delivery of County services to Limited English Proficiency individuals.**

**Attachment F**

**Hennepin County**

**Contracted Interpreting & Translation Vendors**

**2018-2022**

**All in One Translation Agency, LLC**

1109 158th St. W.

Burnsville, MN 55306

**Arch Language Network, Inc.**

125 Little Canada Rd W. Suite 200

Little Canada, MN 55117

**A-Z Friendly Languages, Inc.**

3818 Brookdale Circle N.

Brooklyn Park, MN 55443

**Global Language Connections**

3618 East Lake St.

Minneapolis, MN 55404

**Kim Tong Translation Services**

2994 Rice St.

Little Canada, MN 55113

**Language Line Solutions**

One Lower Ragsdale Dr., Bldg. 2

Monterey, CA 93940

**Middle English Interpreting**

2125 Emerson Ave S.

Minneapolis, MN 55405

**Surad Interpreting & Translation Co.**

2027 Nicollet Ave. S.

Minneapolis, MN 55404

**University Language Center, Inc**

4445 W. 77th St., Ste 110

Minneapolis, MN 55435