

Anoka County Human Services Limited English Proficiency (LEP) Plan

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100 - Purpose and Legal Basis

This document serves as the Anoka County Human Services plan to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000 et seq.; 45 CFR §80; 68 FR 47311 (2003); 28 CFR §42.405(d)(1); and 7 CFR, §272.4 et seq. There are four components to this document.

200 - Assessment

300 - Policy

400 - Training

500 – Monitoring

200 – Assessment

201 – Needs Assessment - Anoka County Human Services will on at least an annual basis assess the language needs within the County. An interdepartmental LEP Team comprised of Economic Assistance, Social Services and Behavioral Health, Finance, Public Health, Job Training, and Corrections staff will assess the language needs. The LEP Team will review information available from the major school districts, legal assistance, the English as a Second Language provider, the Minnesota Department of Human Services, and other groups to determine the non-English languages that are most predominant in the county and which constitute populations that the county serves or those that may be eligible for county-provided services.

The following non-English languages are more common in Anoka County Human Services Programs: **Spanish, Russian, Arabic, Hmong and Somali**. The LEP Committee regularly reviews usage of Language Line and other interpreter services to evaluate the non-English language interpreters utilized by the various Anoka County Human Services Departments.

202 – Case Finding - Specific language needs of each applicant with LEP will occur at the time of intake, application, or referral for services. If staff suspects that the applicant is a person with LEP, the worker will attempt to determine the language needs of the individual. Cards listing major languages will be used, if necessary to determine which language is involved. Reasonable efforts will be made by Anoka County Human Services to provide same-day interpreter services. LEP needs of clients will be clearly identifiable in their case record. Persons with LEP may also be provided with information regarding English as a Second Language classes. Economic Assistance (EA) will have the most contact with the LEP population. EA staff will review the language preference questions on the Health Care Application and the Combined Application Form (CAF). Language preferences will be entered into the applicant's primary language field in the MAXIS system. If an interpreter is needed, it also will be entered in MAXIS. Social Services, Public Health, Corrections and Job Training Center employees will document language needs in the appropriate system to allow awareness of the need for interpreter services.

203 – Points of Contact - The principal point of contact will most likely be in the office setting at the Blaine Human Services Center or the Anoka County Government Center at the time of intake, an emergency, or application for financial assistance. The most appropriate form of interpreter services will likely be language assistance related to financial assistance or health care. The other points of contact may involve face-to-face contacts for social services, mental health, corrections, or public health intervention which may take place in Anoka County offices, homes or community settings.

204 – Resources Needed - Anoka County Human Services will utilize state and county contracts with interpreter agencies and maintain a list of interpreters for staff use. This list will extend beyond the most common languages in Anoka County, and include additional languages that are available.

Anoka County Human Services will also utilize telephone interpreter services. When feasible, onsite interpreter services will be made available and are the first preference. (Note: interpreter agencies may require advance notice for scheduling.)

205 – Timely Access – Anoka County Human Services will utilize a telephone interpreter service that is available 24 hours a day. When on site interpreter services are to be used, it will be necessary to schedule appointments at mutually convenient times for the client and the interpreter.

300 Policies and Procedures

301 – Agency Commitment – Anoka County Human Services is committed to the intention of the Civil Rights Act of 1964. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various programs operated by Anoka County Human Services.

Anoka County Human Services has, by prior action, adopted the Comprehensive Civil Rights Plan, effective July, 1995 and revised July, 2016 in conformity with the DHS Bulletins #94-84A dated 12-27-94 and 16-89-01 dated March 25, 2016. The LEP plan supplements the Comprehensive Civil Rights Plan.

302 – Range of Oral Language Assistance – Primary use will be made of the state and county contracts with interpreter agencies, including Language Line Services. Contracted agencies are able to supply on site interpreters for the most common languages and Language Line Services is seen as having interpreter services available in all of the languages Anoka County Human Services expects to encounter. Preference will be given to use of on-site interpreters. Telephone interpreter services, including Language Line Services, will be used when timeliness and necessity do not allow for scheduling of an on-site interpreter. There will also be limited oral language assistance on site in the Anoka and Blaine locations from current agency employees having very cursory proficiency in several non-English languages. Anoka County Human Services will take advantage of the “I Speak” posters and cards made available by the Minnesota Department of Human Services.

303 – Uncommon Languages – When contact is made by persons who use a language other than languages most commonly encountered in Anoka County or major languages designated by the Minnesota Department of Human Services, reception staff will refer all such cases to their department’s intake or screening specialist. This person will be responsible for trying to determine what the customer’s language or country of origin. Once determined, contact will be made with an appropriate telephone interpreter in the customary manner.

304- Affirmative Action - At no time in the service delivery process will the client incur any costs associated with LEP-directed interpreter services. Clients will be informed verbally that there is no charge for this service if an interpreter is needed.

305 – Use of Family and Friends – Staff should accommodate clients’ wishes to have family or friends serve as interpreters whenever possible. However, staff must consider client confidentiality and interpreter competency. Protection of confidentiality and accuracy of interpretation should always be the highest concern; always offer free interpreter services, and if a client prefers to have a family member or friend interpret, request that the client permit a trained interpreter to listen in to ensure accuracy of interpretation. The worker shall document in the case file the circumstances for use of family or friends. Anoka County will only pay for interpreter services for those interpreters under contract with Anoka County when Anoka County has requested their services. Except in an emergency or for incidental contact, no individual under the age of 18 may be used for interpreter services. See Section 309.

306 – Competency Standards for Interpreters – Any interpreter used for LEP services must be proficient in both English and the target language, be able to convey information in both languages accurately, have had orientation/ training that includes the skills and ethics of interpreting, have basic knowledge in both languages of specialized program terms or concepts, and be sensitive the client’s culture. Anoka County interpreter contracts will require that interpreters be properly trained, competent and qualified to interpret, and abide by the code of ethics. When using family, friends or significant others, the worker must make a judgment as to the competency of the proposed interpreter.

307 – Dissemination of the LEP Plan – Copies of the LEP Plan will be posted on the Anoka County Intranet and made available to: Anoka County Human Services employees, Anoka County Division Managers, Finance, County Sheriff, County Attorney, County Administrator and the Central Minnesota Legal Services office. A copy of the main public announcement, MS – 1659 Language Poster, will be prominently displayed in Anoka County Human Services central reception areas. Anoka County will display DHS 4739 Notice.

308 – Services To Illiterate – When a customer is illiterate – cannot read or write in his or her native language – Anoka County Human Services will use reasonable efforts to find a suitable interpreter who can assist the person in completion of necessary forms, documents and necessary communications. The Anoka County Human Services intake worker will make the determination in conjunction with the interpreter about the customers’ literacy skills. An on-site interpreter will be used. Interviews will be scheduled when face to face interpreter services can

be provided. Faxing of forms or over-the-phone services may be required on a case-by-case basis.

309 – Emergency and Incidental Communications – When an emergency exists or communication is incidental in nature and LEP considerations are present, Anoka County Human Services may waive its LEP Plan policies if necessary to ensure that necessary emergency services are provided. A supervisor must be informed prior to or immediately after taking such actions.

310 – Access to and Costs of Interpreters - Under no circumstances will Anoka County Human Services indicate - either verbally or in writing - that any applicant or client in need of LEP services will be charged for interpreter services. All such services shall be at no expense to the applicant or client. Such services will be provided during normal business hours and when necessary, during non-business hours when an emergency has been determined to exist.

311 – Notice of Service Availability - LEP clientele will be informed of the availability of interpreter and translation services when it appears that the customer is not able to communicate in English. Notice of service availability will come from the MS-1659 document posted in the Anoka County Human Services reception areas. Anoka County will use available DHS translated materials when it has been determined that the person presenting for services is unable to understand English.

312 – County Produced Materials – Anoka County Human Services will rely on the state produced documents as the primary source of translated materials. Anoka County Human Services will follow the Minnesota Department of Human Services translation numerical guidelines as required. Translation will be used on a case by case basis as necessary to convey vital information.

313 – Complaint Resolution Protocol - Any adverse action taken by Anoka County Human Services with which an applicant or recipient disagrees is subject to complaint. Anoka County Human Services has a formal complaint process that can be utilized to try to resolve any dispute. In the absence of local resolution, the person making the complaint will be informed in a language understandable to the grievant, of the process to follow in make a complaint to DHS or the Office of Civil Rights. The complaint procedure will conform in all respects to the Anoka County Human Services procedure included in Comprehensive Civil Rights Plan Requirements. Interpreter services will be used to facilitate the dispute resolution process. All such complaints can be made to any of the parties listed at the end of this LEP Plan.

314 – Posting – Clients will be notified of the availability of the LEP Plan and the Comprehensive Civil Rights Plan by a posting on the main bulletin boards in each of the Anoka County Human Services Reception Areas.

315 – Contracted Providers - Service providers who are reimbursed with federal funds pursuant to a contract with Anoka County Human Services are subject to LEP requirements. Contract Attachment C has been developed and updated by the Anoka County Attorney’s Office and will be incorporated into new contracts and existing contracts at time of renewal.

400 - Training

401 – Distribution of the LEP Plan – An electronic version of the LEP Plan will be maintained on the Anoka County Human Services Administrative Website. All Anoka County Human Services employees will be provided access to the LEP Plan upon its adoption which will be available on the Anoka County Intranet. This includes staff of Economic Assistance, Social Services and Behavioral Health, Finance, Public Health, Job Training, Corrections, and Human Services Administration. If any changes are made in the document, notice will be provided to the same entities listed in Section 307 above.

402 – Training of Staff – Annual training is provided to all Human Services Staff. This training will be provided in the context of staff meetings or on line webinars within each Anoka County Human Services Department. Each new employee will receive training sessions in computer based trainings that will be incorporated into the employee’s orientation at the time of hire.

500 – Monitoring

501 – Evaluation of the LEP – At least annually, the LEP Plan will be reviewed for effectiveness. The evaluation will involve the interdepartmental LEP Team to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies. Elements of the evaluation will include the following:

- Number of persons with LEP in Anoka County.
- Assessment of current language needs of Anoka County Human Services applicants and clients to determine if the clients need an interpreter and/or translated materials; updating case files which lack information about a client’s language preference; determining if clients need to be asked their language preference.
- Determining whether existing assistance is meeting the needs of applicants and clients with LEP.
- Assessing whether staff members understand Anoka County Human Services LEP policies and procedures and how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.
- Seeking and obtaining feedback from non-English or limited-English speaking communities in Anoka County including applicants and clients as well as any known community organization or advocacy group working with non-English or limited- English speaking communities.
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502 – LEP Contact Person – For purposes of the LEP Plan, Anoka County’s designated contact person is the department director with appropriate delegation made to supervisors within their respective departments.