

Limited English Proficiency Plan

Lake County Department of Job and Family Services

No

**Civil Rights Coordinator
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Report Includes

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Limited English Proficiency Plan

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Limited English Proficiency Plan

I. Purpose

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

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

II. Authorities and Definitions

Federal Authorities

- **Title VI of the Civil Rights Act of 1964**, 42 U.S.C. §2000 et seq.; 45 CFR §80, Nondiscrimination based on race, color or national origin for any programs receiving federal financial assistance. Failure to provide meaningful access to program information, benefits and/or services due to an applicant/recipient's LEP is considered discrimination based on national origin.
- **U.S. Department of Justice Title VI Legal Manual**, January 11, 2001 edition
- **U.S. Department of Labor Policy Guidance on the Prohibition of National Origin Discrimination as it Pertains to Persons with Limited English Proficiency (05/29/03)**, Federal Register, Volume 68, Number 103, Page 32289-32305
- **Food Stamp Program LEP regulations**, 7 CFR §272.4
- **Ohio Department of Job and Family Services Language Access Policy**, Dated January 20, 2005
- **Ohio Administrative Code section 5101:9-2-01**
- **Ohio Administrative Code section 5101:9-2-05**

Definitions of Terms:

- **County Agency** – County Departments of Job and Family Services, County Child Support Enforcement Agencies, Public Children Services Agencies, WIA funded One-Stop Agencies standing alone or any combined agencies with a single administrative structure.
- **Effective Communication** – In a human services, social services or job training/assistance setting; effective communication occurs when county agency staff have taken necessary steps to make sure that a person who is LEP is given adequate information in his/her language to understand the services, benefits or the requirements for services or benefits

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

- **Interpretation** – Interpretation means the oral or spoken transfer of a message from one language into another language.
- **Limited English proficiency** –A person with limited English proficiency or “LEP” is not able to speak, read, write or understand the English language well enough to allow him/her to interact effectively with a county agency.
- **Meaningful access** – “Meaningful access” to benefits, programs and services is the standard of access required of the county agencies since they receive federal funding through the state of Ohio. Meaningful access requires compliance by county agencies with state and federal LEP requirements as set out in relevant state and federal laws. To ensure meaningful access for people with LEP, county agencies must make available to applicants/recipients of benefits/services free language assistance that results in accurate and effective communication that does not result in undue delay or denial of benefits to which the LEP applicant/recipient is eligible.
- **BCR** – The entity contained within the Ohio Department of Job and Family Services charged with the responsibility of overseeing compliance by county agencies with relevant civil rights laws including those related to LEP.
- **Translation** – Translation means the written transfer of a message from one language into another language.
- **Vital Documents** – forms or documents *designed and utilized by the county agency* that are critical for accessing federally funded services or benefits or are required by law. Vital documents can include but are not limited to; applications for county designed programs, consent forms designed by the county agency, letters designed by the county agency requesting eligibility documentation.
- **Outreach Documents** – county agency designed documents utilized by the county agency to provide information to the general public but targeting individuals who are eligible or may be eligible for county benefits/services or programs.

III. Lake County Department of Job and Family Services Policy

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

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

IV. LEP Population

The Lake County Department of Job and Family Services has determined that the language(s) other than English that is/are most likely to be encountered by employees of the the Lake County Department of Job and Family Services is Spanish, according to US Census data. The census data is consistent with the experience of the County JFS Office. The Lake County Department of Job and Family Services will periodically monitor the LEP population of those served or those who could be served by the Lake County Department of Job and Family Services. If it is determined that other LEP language groups are seeking benefits/services or are potentially eligible to receive benefits/services within Lake County, the Lake County Department of Job and Family Services will adjust its methods and services to serve the new population accordingly. Any new LEP populations will be reflected in the next LEP plan.

V. Methods of Providing Services to LEP Population

(Check any that are applicable)

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

Laura Bell – Spanish is Laura’s first language.

Tatiana Castellano – Successfully completed ODJFS Interpreter Training.

Maria Colon – Spanish is Maria’s first language.

Miriam Kaser - Successfully completed ODJFS Interpreter Training

Amanda Olvera - Successfully completed ODJFS Interpreter Training

- ☐ Staff Interpreter(s) (if checked provide name(s) and language(s) with brief description of method of determining competence as interpreter(s).).

Information here

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

The Lake County Department of Job and Family Services maintains a contract with the International Services Center, the only comprehensive non-profit organization that offers translation services, face-to-face interpreting services and telephone interpreting services in the Cleveland Metropolitan area. Additional interpreting contracts are maintained with Catholic Charities Corporation, Asian Services, Inc., and Language Line Services.

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- ☐ Volunteer Interpreters (if checked provide names, organization if applicable as well as brief description of method of determining competence as interpreter).
Information here
- ☐ Telephone Interpreting Services (if checked provide name of vendor with brief description of how vendor was chosen. Attach copy of contract to this plan)
Information here
- ☐ Agreement with Educational Institution (if checked provide name of institution, name(s) of interpreters, brief description of method of determining competence of interpreter. Attach copy of agreement, MOU or other written document to this plan. If nothing in writing, describe arrangement).
Information here
- ☐ Translation contracts (if checked provide name(s) of contractor(s), list service(s) provided, language(s) covered and brief description of how vendor was chosen. Also attach copy of agreement or contract to this plan).
Information here
- ☐ Other (if checked explain arrangement and attach any relevant documents explaining the arrangement to this plan).
Information here

VI. Interpreter Services

The Lake County Department of Job and Family Services , at no cost to the LEP individuals or families, provides interpreter services to all LEP individuals or families applying for, participating in programs or receiving services/benefits through the Lake County Department of Job and Family Services by the means designated in section V. of this plan. The interpreter services are provided in an efficient and timely manner so as not to delay a determination of eligibility for an individual or family, receipt of eligible services/benefits or participation in a county run program beyond that of an English speaking individual or family. The Lake County Department of Job and Family Services makes this policy known to the LEP through the following methods:

The agency posts signs notifying applicants and beneficiaries that interpreters are available at no cost in a variety of languages, including Spanish. Babel cards are also posted. English and Spanish applications and outreach material are available at the agency and at other entities, including Lake County Family Planning, local hospitals, libraries and the Lake County General Health District. Additionally, English and Spanish brochures describing services are available at the agency and at various community events, fairs and speaking engagements.

The Lake County Department of Job and Family Services addresses phone calls and voice mail by LEP individuals in the following manner: A Spanish voice mailbox is available for any staff member to transfer Spanish-speaking clients. Callers hear a Spanish greeting, leave a message and have their call returned by a Spanish-speaking staff member. The automated attendant that greets clients calling the agency also provides a Spanish greeting. Clients indicating they speak Spanish are automatically transferred to the Spanish voice mailbox described above. These calls

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are returned no later than the end of the following business day. This is the same practice for returning all agency calls.

The Lake County Department of Job and Family Services addresses walk-ins at the JFS building who are LEP individuals in the following manner: Spanish speaking staff are available for walk-in clients.

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

VII. Translation of Documents

The Lake County Department of Job and Family Services translates all county designed vital documents into each LEP language group that comprises at least 5% or 1,000, whichever is less, of persons eligible for or likely to be affected by the agency's services. Currently, there are no LEP language groups meeting this criterion.

The Lake County Department of Job and Family Services translates all outreach documents for each LEP group that equals 10% or 3,000, whichever is less, of persons eligible for or likely to be directly affected by the agency's services. Currently, there are no LEP language groups meeting this criterion.

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

VIII. Dissemination of Information to County Agency Personnel

The Lake County Department of Job and Family Services makes its personnel aware of its LEP policies, methods of providing services to LEP individuals and other information contained within this plan through the following: The Civil Rights Coordinator trains all staff members during their new hire orientation. Training is conducted for all staff members every year. The LEP policy is also contained in the Employee Handbook.

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IX. (Optional)

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

N/A

X. Attachments

Attachment A – Contract with the International Services Center

Attachment B – Contract with Catholic Charities Corporation

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Signatures:


Shawn Douglas, Civil Rights Coordinator

10-29-14
Date


Matthew Battiato, Director

10-29-14
Date