

Ohio Department of Job and Family Services  
**LIMITED ENGLISH PROFICIENCY PLAN**  
**2018 - 2020**

**Lake County JFS / OMJ Center**

**5/10/2018**

**Civil Rights Coordinator**  
**SHAWN DOUGLAS**

**PLAN INCLUDES:**

**DJFS**  
**PCSA**  
**CSEA**

**OHIOMEANSJOBS LAKE COUNTY**

# Limited English Proficiency Plan

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# **Limited English Proficiency Plan**

## **I. Purpose**

The purpose of this Limited English Proficiency Plan is to provide assurances and demonstrate that customers of Lake County JFS and OhioMeansJobs Lake County 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 / OMJ Center.

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 / OMJ Center 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**

### **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
- **29 CFR Part 38 Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act**, July 22, 2014.
- **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
- **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 Civil Rights Plan**
- **Ohio Administrative Code section 5101:9-2-05 WIOA Nondiscrimination Complaints**
- **IPP.9004 Limited English Proficiency Protocol**

## Limited English Proficiency Plan

### **Definitions of Terms:**

- **County Agency** – County Departments of Job and Family Services, County Child Support Enforcement Agencies, Public Children Services Agencies, WIOA funded OMJ (Ohio Means Job) Centers, 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 / OMJ Center 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 offered by the County Agency / OMJ Center. These necessary steps must allow an individual the opportunity to qualify for the benefits or services provided by that County Agency / OMJ Center 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 / OMJ Center.
- **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 / OMJ Center.
- **Meaningful access** - "Meaningful access" to benefits, programs and services is the standard of access required of the County Agencies / OMJ Centers since they receive federal funding through the state of Ohio. Meaningful access requires compliance by County Agencies / OMJ Centers 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 / OMJ Centers 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** - Bureau of Civil Rights. The entity contained within the Ohio Department of Job and Family Services charged with the responsibility of overseeing compliance by County Agencies / OMJ Centers 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. *Note: The use of translation engines through the internet or language applications can be very useful tools for a native speaker of that particular language. A native speaker is able to make the appropriate adjustment and/or corrections to the translation. A non-native speaker will have difficulty making the proper adjustment to the syntax's, meaning, and vocabulary. One example we found using one of the translation engines was: e.g., Spanish- dos burritos por favor; the English translation – two donkeys please, instead of two burritos please. The computer does not know that you are referring to food. The computer translates literally. Therefore, to avoid any misunderstandings we do not recommend the use of engine translations or applications unless you are a native speaker.*

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- **Vital Documents** - forms or documents *designed and utilized by the County Agency / OMJ Center* 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 / OMJ Center; letters designed by the County Agency / OMJ Center requesting eligibility documentation.
- **Outreach Documents** - County Agency / OMJ Center designed documents utilized by the County Agency / OMJ Center 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 JFS and OhioMeansJobs Lake County LEP Policy**

It is the policy of Lake County JFS and OhioMeansJobs Lake County 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 Lake County JFS and OhioMeansJobs Lake County, its contractors and/or vendors. Meaningful access involves Lake County JFS and OhioMeansJobs Lake County promoting effective communication to LEP individuals seeking or receiving services, benefits or participation in 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**

Lake County JFS and OhioMeansJobs Lake County has determined that the language(s) other than English that is/are most likely to be encountered by employees of the Lake County JFS and OhioMeansJobs Lake County is/are Spanish. The methodology used to make this determination is as follows: Lake County JFS and OhioMeansJobs Lake County has determined that the language(s) other than English that is/are most likely to be encountered by employees of the the Lake County JFS and OhioMeansJobs Lake County is Spanish, according to US Census data. The census data is consistent with the experience of the County JFS Office.

County Agency / OMJ Center should provide **translated vital documents and interpretation services** to any LEP group that comprises approximately 100 or less low income single language minority household.

For program informational activities (**outreach**) in the appropriate language the County Agency / OMJ Center has to have less than 2,000 low income, if approximately 100 or more of those are single language minority; or in a County Agency / OMJ Center with 2,000 or more low income household, if approximately 5% or more of these household are single language minorities.

For the purpose of the LEP Plan a low-income household refers to as a household at or below 125% of the poverty level.

Lake County JFS and OhioMeansJobs Lake County will periodically monitor the LEP population of those served or those who could be served by Lake County JFS and OhioMeansJobs Lake County. If it is determined that other LEP language groups are seeking benefits/services or are potentially eligible to receive benefits/services within the Lake County], Lake County JFS and

## **Limited English Proficiency Plan**

OhioMeansJobs Lake County 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)).

Maria Colon – Spanish is her first language.

Miriam Kaser - Successfully completed ODJFS Interpreter Training

Gloria Zarco-Perez – Spanish is her first language.

Reynally Rivera – Spanish is her first language.

- 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.

- 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).  
Language Line Services provides telephone interpreting services. They were chosen based on references from other County JFS agencies.

- 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

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- 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).

Lake County JFS and OhioMeansJobs Lake County maintain 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.

- Other (if checked explain arrangement and attach any relevant documents explaining the arrangement to this plan).

Information here

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### **VI. Interpreter Services**

Lake County JFS and OhioMeansJobs Lake County , 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 JFS and OhioMeansJobs Lake County 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 JFS and OhioMeansJobs Lake County makes this policy known to the LEP through the following methods (e.g. posters in other languages, Babel cards, etc.). 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.

Lake County JFS and OhioMeansJobs Lake County addresses phone calls and voice mail by LEP individuals in the following manner (describe County Agency / OMJ Center phone services for LEP individuals. If addressed through something checked in section V. can reference that portion). Staff are instructed to transfer Spanish speaking clients to our Spanish Voice Mail Box at extension 4455. Callers hear a greeting in Spanish and are instructed to leave a voice mail message. Bilingual staff members check the mail box and return calls daily.

Lake County JFS and OhioMeansJobs Lake County addresses walk-ins to the Lake County JFS and OhioMeansJobs Lake County name building(s) who are LEP individuals in the following manner (refers to receptionists or point of contact) Spanish speaking staff are available for walk-in clients..

Lake County JFS and OhioMeansJobs Lake County 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, Lake County JFS and OhioMeansJobs Lake County will inform the customer that the family may stay but will not be able to serve as the interpreter. Only on rare occasions when there is no other strategy, such as interpretations over the phone, the Lake County JFS and OhioMeansJobs Lake County will then, on a case by case basis, consider factors such as: competence of the family or friend 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 Lake County JFS and OhioMeansJobs Lake County should provide its own independent interpreter for itself. In no case does Lake County JFS and OhioMeansJobs Lake County allow a minor child to act as interpreter for an LEP individual or family.

### **VII. Translation of Documents**



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Lake County JFS and OhioMeansJobs Lake County 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.).

[Lake County JFS and OhioMeansJobs Lake County 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 Lake County JFS and OhioMeansJobs Lake County services. Currently, there are no LEP language groups meeting this criterion.).

For any LEP individuals applying or receiving services from Lake County JFS and OhioMeansJobs Lake County where vital documents are not available in the LEP individual's language, Lake County JFS and OhioMeansJobs Lake County provides a notice in the LEP individual's language that the LEP individual may bring any document into the Lake County JFS and OhioMeansJobs Lake County office and an interpreter (face to face or telephonic interpretation) will be provided free of charge to interpret the document for the LEP individual.

### **VIII. Dissemination of Information to County Agency / OMJ Center Personnel**

Lake County JFS and OhioMeansJobs Lake County 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: (explain in some detail, e.g. training by civil rights coordinator, on-line training, new employee orientation, personnel handbook, hand-outs, etc.).

Lake County JFS and OhioMeansJobs Lake County make 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.

### **IX. (Optional)**

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

Information here:

### **X. Attachments**

**Attachment A** - Contract with the International Services Center

**Attachment B** - Contract with Catholic Charities Corporation

**Attachment C** - Contract with Asian Services, Inc.


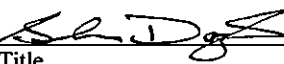
**Attachment D** - Contract with Language Line Services

**Attachment E** - Title

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**Signatures:**

Person with Authority	Director 	Date 5-18-18
Person with Authority	Civil Rights Coordinator 	Date 5-10-18
Person with Authority	Title	Date
Person with Authority	Title	Date
Person with Authority	Title	Date
Person with Authority	Title	Date