

# 2015 Language Access Plan

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# 1. Summary

The Language Access Plan is a resource document for the City of Minneapolis' departments, staff, elected officials and contracted vendors. It contains policies, procedures and practices to better communicate with and serve residents with limited English proficiency.

In 2004, the City Council adopted the "Minneapolis in Any Language Plan," referred to as the "Limited English Proficiency Plan." A person who has limited proficiency in English (LEP) cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with English speakers.

The updated 2015 Language Access Plan includes both the federally mandated Limited English Proficiency requirements, and additionally, Minneapolis City-based initiatives to increase language access, services, engagement and participation. "Language Access" refers to the City-based procedures, enhancements and systems to engage and communicate with LEP residents.

## **What does this plan address?**

The plan is a guide for City staff to ensure City programs, services and activities are accessible to non-to-limited English speaking residents and people with disabilities requiring information in alternative languages and formats. It outlines City operating policies and procedures such as identifying primary languages, interpreting and translation tools, and delivery of programs and services in non-English languages.

## **Why does the City need a plan for making services accessible to LEP individuals?**

The City is strongly committed to making City services and information about those services available to everyone, regardless of language barriers. This commitment stems from overall City goals of responsive government, community engagement, and customer service. As residents, workers or visitors who contribute to City life, people with limited English proficiency are entitled to fair and equal access to service.

The City is required by Title VI of the Civil Rights Act of 1964 and Executive Order 13166 to plan for and provide meaningful access to services for LEP residents. This applies to all City elected officials, departments and contracted vendors partnering with the City to deliver programs and services.

The 2004 LEP plan complied with the Department of Justice requirements and regulations of identifying language service needs, procedures and plans for allocation of resources. The updated 2015 plan improved upon the previous plan's policies and procedures; additionally, incorporating City-based initiatives.

## **Who is responsible for the plan?**

The Neighborhood and Community Relations (NCR) Department and the City Coordinator's Office oversaw the development of the citywide Language Access Plan. NCR's Access and Outreach Manager will assist all City departments in creating and implementing plans at the department level.

## 2. Introduction

### The LEP population in Minneapolis

Minnesota and its largest city, Minneapolis, have become increasingly diverse over the past several decades. Immigrants have contributed greatly to the city's economic, cultural and linguistic diversity. Of the total Minneapolis population, 74,752 (20%) speak languages other than English. Additionally, 36,466 (9.5%) reported their level of speaking English as "less than very well."

In 2013, foreign-born Minnesotan population was 403,514 (7.4%), which is an increase of 54.9% from Minnesota's foreign-born population in 2000, recorded at 260,463 (5.3%). In 2000, 55,475 (14.5%) of Minneapolis residents were foreign-born. The 2013 American Community Survey reported 68,810 (15.2%) of Minneapolis' population are foreign-born.

One key way to track the proliferation of languages spoken in Minneapolis is utilizing school data and what languages students speak at home. For the 2015 school year, the Minnesota State Department of Education reported over 237 languages represented in Minnesota's public schools. Minneapolis Public Schools identified 96 languages and dialects represented amongst their student body for the 2015 school year.

Immigration status is not a completely reliable marker for English as a second language, since many immigrants speak fluent English. Furthermore, immigration figures based on the US Census are often outdated or incomplete. But immigration figures do provide a partial picture of the growing linguistic diversity of Minneapolis.

### Legal mandates for LEP services

There is also a compelling legal argument for language services. The City of Minneapolis and its departments are required by federal and state law to plan for and provide meaningful access and effective communication for LEP individuals.

Title VI of the Civil Rights Act of 1964 and the implementing federal regulations require City departments receiving federal financial assistance to provide meaningful access to programs and activities for LEP persons. Failure to provide meaningful access could result in a loss of federal funding. Private individuals could bring a civil action alleging intentional discrimination in the denial of services based upon their protected class status.

Title VI of the Civil Rights Act of 1964 and related federal regulations, state law and municipal ordinances apply to all city departments and contracted vendors.

## What is “meaningful access?”

Meaningful access means that a person:

- Is given adequate information;
- Can understand the services and benefits available;
- Can receive the services for which he or she is eligible; and
- Can communicate the relevant circumstance of his or her situation.

## How was the plan created?

*Minneapolis in Any Language (2004)*

In November 2003, the City Council passed a resolution approving the creation of a citywide Limited English Proficiency Plan. This was to give specific direction to staff on how to make City programs and services accessible to those who speak limited English. After months of work and vigorous review of legal mandates by department representatives and a LEP Work Team, the City adopted a LEP plan in 2004.

*Minneapolis in Any Language (2015 revision)*

In March 2014, the City Council adopted a set of values, goals, and strategic directions to drive the City’s work. The goal of ‘One Minneapolis’ called for elimination of inequities and disparities for all residents to prosper and participate. Recognizing Minneapolis’s rich ethnic and cultural history and communities, the Neighborhood and Community Relations department began the initiative to update the plan. The update is in part to identify and eliminate language barriers to ensure equitable access to City programs, services and decision making processes.

## What are the City’s primary language groups?

Minneapolis’ primary language groups are identified using an established formula. This formula will be re-applied every two years. Primary language groups may change, as new data appears. For implementing the plan in 2015, this formula shows that the primary language groups in Minneapolis in rank size order:

1. Spanish
2. Somali
3. Hmong
4. Amharic
5. Vietnamese
6. Lao
7. Oromo



Federal guidelines require having a monitoring system to determine how language services can be more accessible to LEP individuals. The analyses of City language contracts demonstrate where services are provided in non-English and the format of service delivery (such as interpretation and translation). Phone-interpretation contracts (such as NCR's and 311's language lines) represent resident driven data. This data shows volume and trends of LEP residents calling to inquire about City programs, services and activities in their native language. Not a complete representation; yet, it is good subsidiary information.

## How to use this plan

This plan is intended for City elected officials, department managers, supervisors and staff who interact directly or indirectly with LEP individuals in Minneapolis. LEP legal requirements may also apply to subcontractors and vendors who do business with the City. LEP community members and advocates can refer to this plan to learn about Minneapolis' commitment to equitable access.

This plan has and meets federal LEP requirements, located in the general policies. Outlined City operations and procedures are mechanisms for Language Access. Language services and tools are used as part of equitable strategies to include all residents in City programs, services and activities.

The plan covers:

- **Notice:** providing notice to limited English speakers of their right to free language services;
- **Identification:** identifying LEP individuals for needed language services by City elected-officials and departments;
- **Interpreting:** offering free, timely spoken, visual or interactive language interpretation for LEP individuals;
- **Translation:** providing free written language translations of vital City information;
- **Hiring:** hiring to meet multilingual service needs;
- **Training:** delivering training on language service mandates to all City staff;
- **Timetable:** assigned responsibilities for implementation; and
- **Tracking:** how the plan will be monitored and updated.

## Current (2015) levels of the City's language services

Department representatives and members of the Accessibility Liaison Network were engaged to get a baseline picture of the City's provided language services.

Conducted conversations were to determine:

- Which key business lines, programs, services and/or activity are used by LEP individuals;
- Which departments are collecting data on LEP resident usage of their services;
- What resources and tools are being used to communicate with LEP individuals;

- If any departmental-level policies are in place related to serving LEP individuals;
- Department recommendations on how services could be made more user-friendly for LEP individuals.

Collected information was used to shape the revision process by having clearer guidance and procedures for City staff to effectively engage and communicate with LEP residents.

The report provided a snapshot of some, but not all City departments' approaches to language services in 2015. It is not an evaluation of the quality or comprehensiveness of City services, nor is it a comprehensive list of all City services or all strategies that the City is currently using to address the communication needs of its LEP residents. The full report "Services Offered In Minneapolis City Departments For People With Limited English Proficiency" is reprinted at the conclusion of this plan.

Among the key findings of the 2015 report:

- City is in compliance with meeting LEP requirements;
- Several City departments have made efforts to ensure quality services to the City's LEP community, particularly through their use of interpreters and translated documents. However, much more needs to be done to ensure meaningful access to services;
- Need for clarification, training and consultation for staff on when to utilize interpreting and translation tools to communicate with LEP residents; and
- Need to track and monitor utilization of City services based on the language of residents.

# 3. Definitions

This chapter includes:

- Definition for language services
- Definitions for notice
- Definitions for identification
- Definitions for interpreting
- Definitions for translation
- Definitions for training

## **Definitions for language services**

### **Language Access**

Effective strategies to engage and communicate with residents, acknowledging language is not a barrier. Residents have opportunities for meaningful access to participate in the City of Minneapolis programs, services, activities, and decision making processes.

### **Limited English Proficiency (LEP) residents**

A person with Limited English Proficiency (LEP) cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with City staff.

Individuals who communicate with American Sign Language are covered in this definition, although other federal laws and regulations, such as the Americans with Disabilities Act, apply and should be consulted separately.

Note: LEP is used as a reference to the individual or population in this iteration or citing federal LEP requirements.

### **Primary languages**

Languages spoken by at least 1,000 Minneapolis residents.

### **Resident**

Someone who lives within the city boundaries. This plan applies to anyone who lives, works in or visits the City of Minneapolis. In this document, the term “resident” is not related to immigration status.

### **Timely**

Avoids the effective denial or delay of important benefits or services.

## **Definitions for notice**

Proactively informing LEP residents of available free language services and how to access them.

## **Definitions for identification**

Collecting relevant information to provide effective program and service delivery to LEP residents. Departments can use gathered data to plan engagement and communication strategies for LEP residents.

Collected information consists of:

- The number or proportion of LEP individuals eligible to be served by City services or departments;
- The number or proportion of LEP individuals served; and/or
- The frequency of services or encounters.

## **Definitions for interpreting**

### **Interpreting and interpretation**

The translation of a spoken message from one language to another, preserving the intent and meaning of the original message.

## **Definitions for translation**

### **Translating and translation**

The conversion of written communication from one language to another. An accurate translation is one that conveys the essential meaning of the original text.

### **Vital documents**

Information or documents critical for accessing City operations, federally funded services, and/or benefits, or are documents required by law. Documents that require a signature are considered vital.

## **Definitions for training**

### **Training**

Ensuring that City staff is familiar with mandates requiring equal level of service for LEP residents. All staff should know their department's procedures for LEP service.

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## **4. Policies**

**This chapter includes:**

- **Policies for notice**
- **Policies for identification**
- **Policies for interpreting**
- **Policies for translation**
- **Policies for volunteers, children and technology**
- **Policies for training**

## **Policies for notice**

### **The City must proactively notify LEP individuals of their right to service**

City departments and staff must ensure that people with limited English proficiency know they have the right to free, timely language services.

#### **Notices include (at minimum)**

- Information about available language services;
- Assurance of free and timely service;
- Instructions on accessing services, including directions for contacting City offices.

#### **Notice should be provided in a variety of ways, including, but not limited to**

- Posting signs in appropriate areas such as waiting rooms, reception areas and other points of entry;
- Including standard translated content in outreach documents such as posters or brochures stating that services are available;
- Using a telephone voice mail menu in the most common languages encountered;
- Including notices in local newspapers in languages other than English;
- Airing notices on non-English language radio and television stations;
- Working with cultural community organizations and other stakeholders to inform Minneapolis residents of their right to language access service; and
- Giving presentations at community meetings, schools and other organizations.

#### **Notice should be provided in the primary languages**

For this edition (2015-2017) of the Language Access Plan, notices will be provided in Spanish, Somali, Hmong, Vietnamese, Amharic, Lao and Oromo. When possible, notices or other translated material should include internationally recognized symbols such as those used to identify accessible restrooms.

#### **Notice should be provided based on a calculation of the information or service's relative importance to the LEP individual**

Decisions on which signs, documents or other means of providing notice should be made based on criteria such as:

- Importance or urgency of service;
- Volume of contact;
- Traffic flow.



## **Policies for identification**

### **The City will collect sufficient data about LEP individuals to provide legally mandated services**

The City should establish, at minimum, how many Minneapolis residents primarily speak a language other than English, and which languages they speak. This number should be recalculated, at minimum, once every two years.

### **Information collected about LEP individuals must never be used to discriminate against groups or individuals**

All LEP individuals are eligible for City services. Immigration status is not relevant in determining whether a resident of Minneapolis is eligible for the language services outlined in this plan. City employees should not ask an LEP individual about their immigration status, even in casual conversation.

### **The City must track services provided to LEP individuals**

Results of tracking can be used to measure increases in LEP services, to evaluate changes and to make appropriate budgeting decisions.

## **Policies for interpreting**

### **Interpreters must be offered for free**

The City of Minneapolis must provide an interpreter, free of charge, to people who speak little or no English, or uses American Sign Language, if needed to access City programs, services and activities.

### **Interpreting must be timely**

Access to interpreting services for all City activities, programs and services must be timely. No one can be denied access to services based on the lack of interpreter availability.

### **City departments' role to secure interpretation services**

The department overseeing the program, service or activity is responsible for providing interpreters. Requests are made to NCR a week in advance. It is the department's responsibility to determine interpretation services need and to bear the costs. Reference the "Definition for language services" (Page 11) and "Definitions for identification" (Page 11) sections as guidelines to indicate needed services.

## **Public meetings will have interpreters available**

Use notices (such as the Accessibility Block) for public meeting announcements and invitations to inform LEP individuals that interpreting services are available upon request. Please visit the Accessibility Block page on NCR's CityTalk webpage for further examples.

## **The City will use competent, trained and culturally sensitive interpreters**

Interpretation is more than simply being able to speak two languages. Interpreters are trained professionals who abide by a code of ethics and professional practice standards. For legal proceedings and business with the City, interpreters must be court certified.

## **Contracted interpreters or City employees who provide interpreting services must demonstrate competence to deliver City services**

Interpreting services for the City will be carried out by trained professional interpreters. A competent interpreter should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of interpreting;
- Proficiency in English and the other language, as documented in an objective language proficiency test;
- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated interpreting encounter;
- Fundamental knowledge in both languages of any specialized terms or concepts related to the organization's program or activity;
- Sensitivity to the LEP person's culture.

## **Policies for translation**

### **Translation of vital documents must be offered for free**

The City of Minneapolis must provide a translation of vital documents free of charge, to people who speak little or no English if needed to access programs and services. City departments can work with NCR's Access and Outreach staff and LEP communities for suggestions regarding which documents would be vital to have translated.

### **City departments' role to secure translation services**

The department overseeing the program, service or activity is responsible for providing translated materials. Requests must be submitted to NCR a minimal of two weeks before the deadline. This allows ample time to translate and review the material.

It is the department's responsibility to determine translation services need and to bear the costs. Reference the "Definition for language services" (Page 11) and "Definitions for identification" (Page 11) sections as guidelines to indicate needed services.

### **Translation must be timely**

Access to translated materials in all City departments must be timely. No one can be denied access to services based on the lack of translated material or documents.

### **Vital documents**

Vital information or content are in formats such as notices, brochures, fliers, meeting agenda and minutes, request for proposals, contracts and websites. Vital documents include, but are not limited to:

- Notices advising LEP persons of free language assistance;
- Written notices of eligibility criteria, rights, denial, loss, or decreases in benefits or services, actions affecting parental custody or child support, and other hearings;
- Consent and complaint forms;
- Intake forms with the potential for financial consequences or service delivery changes;
- Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which knowing English is not required; and
- Applications to participate in a recipient's program or activity or to receive recipient benefits or services.

### **Non-vital written materials could include**

- Third party documents, forms, or pamphlets distributed by a recipient as a public service;
- Government documents and forms (for a non-governmental recipient);
- Large documents such as enrollment handbooks (although vital information contained in large documents may need to be translated);
- General information about the program intended for informational purposes only.

### **Vital documents must be in primary languages**

“Vital” documents must be available in the City’s primary languages or readily translated by an interpreter, upon request. Not all documents can be translated and available in every language. City departments must simply have the capacity to translate documents on request, in a timely fashion. (For further discussion and guidance on which documents should be translated, and when, see the *Department of Justice guidance* (67 FR 41466) in Section 8, Print resources, Part E, or refer to [www.lep.gov](http://www.lep.gov).)

### **The City will use competent, trained and culturally sensitive translators**

Translation is more than simply being able to read and write in two languages. Translators are trained professionals who abide by a code of ethics and professional practice standards. Materials translated by an outside source must be evaluated for accuracy of translation. NCR’s Access and Outreach staff will administer quality assurance checks of translated materials to help ensure effectiveness.

## **City translators must demonstrate competence**

A competent translator should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of translation;
- Proficiency in English and the other language, as documented in an objective language proficiency test;
- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated translation job; and
- Fundamental knowledge in both languages of any specialized terms or concepts;
- With approved contract translators, competency is assumed, but a demonstration of competency should be requested.

## **Policies for volunteers, children and technology**

### **Volunteers should not interpret or translate materials unless shown to be competent, according to City standards**

Volunteers, friends or family members whose competence has not been assessed should not be relied upon. The use of untrained volunteers exposes the City to liability, based on its legal obligation to provide competent translation services. Do not use volunteer interpreters regarding financial or legal interactions between the City and resident.

### **Children may not interpret or provide translations**

For reasons of accuracy, confidentiality and family dynamics, minor children (under 18) should not interpret or translate vital documents for family members or other LEP individuals. This policy does not apply in emergencies, when a minor child is the only available potential interpreter.

### **Online and technology-based interpreting and translation programs**

Departments should not use online or technology programs for interpreting or translation. Applications and programs (such as Google Translate) are not 100% accurate. The syntax, content and meaning may not be clear when using technology-based programs. Programs or applications should not be used in formal financial or business interactions between the City and LEP individual.

Interactions regarding a financial implication or service delivery changes should use a bilingual staff, requested interpreter or telephone interpretation services. Refer to *Types of interpretation services* for further instructions.

### **Volunteers may interpret for LEP voters**

According to election law, “a voter in need of assistance may obtain the assistance of any individual the voter chooses, except for the voter’s employer, union agent, or a

candidate for election.” For a full explanation of assistance to LEP voters, see *MN Statute 204C.15—assistance to voters*.

### **Waiver of rights**

Individuals using their own adult volunteer to interpret or translate may be asked to sign a waiver of rights form, in their own language. Staff should never urge or require those who speak little or no English to provide their own volunteer. If the effectiveness of service is compromised or the LEP person’s privacy may be violated due to the volunteer; use a phone interpreter, re-schedule and contact the Access and Outreach Manager.

## **Policies for training**

### **Training around LEP requirements and language services will be coordinated through NCR**

Training on department-level language procedures will be planned and carried out by NCR and the host department. Each department should provide NCR with a list of staff for the Accessibility Liaison Network to assist in coordinating training opportunities.

Training relative to language services should be provided annually. These activities will be coordinated within each department, with support from the NCR’s Access and Outreach Division. Training covers available tools and services for City staff to communicate with LEP residents. Furthermore, coordinate cultural context and competency training on effective engagement strategies for LEP communities.

### **Information on language services will be provided to all newly hired City staff**

NCR will provide information to new hires on how to access interpreting and translation services as part of the employee orientation.

## **Policies for boards and commissions**

### **General language access policies for boards and commissions**

The City’s boards and commissions conduct meetings in English.

Upon request, appointed member(s) may receive language services in order to fully and equitably participate in boards and commissions. These services include:

- Provision for an interpreter at official meetings;
- Translation of meeting agendas and minutes; and
- Translation of other documents necessary for the appointed member to perform his or her duties.

## **Role of departments**

Appointed members, who are LEP individuals, may receive interpretation and translation services for free. The department overseeing the operation and management of a board and commission bears the cost of providing language services. Departments work with NCR's Access and Outreach staff to arrange interpretation and translation services.

# 5. Procedures

This chapter includes:

- Procedures for notice
- Procedures for identification
- Procedures for interpreting
- Procedures for translation
- Procedures for training

## Procedures for notices

### How to notify individuals of their right to accessibility services

Vital materials used for City services should include notices (such as the Accessibility Block) to inform residents accommodations are available. Printed materials containing vital information for public use should include the block for residents to request information in an alternative format. Please visit the *Accessibility Block* page on NCR's CityTalk webpage for examples.

### How to use the Accessibility Block on distributed City materials to residents

The Accessibility Block has directions for requesting free accommodations, alternative-formatted materials and language services. The block details information for residents to contact the department and/or 311 (with phone interpretation services) for assistance.

The Accessibility Block is used for:

- Publicizing information regarding a City decision-making process;
- Information about federal services or benefits, programs or services receiving federal funding;
- Notices about critical or urgent information regarding services;
  - *For example: Snow Emergency, street sweeping, emergency management, trash and recycling, snow shoveling.*
- Notices requiring responses;
- Notices that have a financial implication;
  - *For example: fees, fines, license applications (landlords, taxi drivers, business), parking enforcement or property tax assessment.*
- Issues that include a significant number or percentage of the LEP population in the service area;
  - Frequency and volume of contact and participation in a program or service.
  - *For example: road or sidewalk construction.*

Please visit the *Accessibility Block* page on NCR's CityTalk webpage for further examples.

### How to determine relative need for signs

Departments should post signs in the primary languages informing LEP individuals of their right to free, timely interpreting and translation services. Review inventory of current signage posted in public areas. Decide which signs (directional, instructional, etc.) are most important for accessing services. Translate the most important signs into the primary languages. NCR's Access and Outreach staff can be consulted regarding signage wording: 612-673-3737.



## **How to request a permanent sign for an office in City Hall**

Permanent signs posted in City Hall must conform to historical and aesthetic standards. Contact the Minneapolis Building Commission, 612-673-2150, before posting notice signs.

## **How to request a permanent sign for another City building or office**

Contact and consult with Property Services at 612-673-2079.

## **Procedures for identification**

### **How to identify LEP individuals and measure usage**

Ways to collect information about LEP individuals served include:

- By analyzing existing data sets, such as census figures or information from public agencies;
- By asking LEP individuals to indicate their preferred language, using “I Speak” cards or other mechanisms.
- Adapting current databases used by the City to track languages spoken by clients;
- Incorporating “language spoken” fields in client intake forms and tracking responses;
- Counting website “hits” directed to translated content;
- Conducting resident or customer satisfaction surveys;
- Tracking telephone interpreting service usage;
- Tracking the number of translated materials requested and distributed;
- Tracking the number of interpretation services requested and used;
- Tracking the number of department requests for NCR’s Access and Outreach staff assistance.

### **How to use census and other data to estimate LEP population sizes**

General population statistics based on the 2010 US Census are accessible on the US Census Bureau website at [www.census.gov](http://www.census.gov). Statistics on primary languages spoken in Minneapolis schools are available through the Department of Education at [www.education.state.mn.us/](http://www.education.state.mn.us/).

## **Procedures for interpreting**

### **Types of interpretation services**

The format of interpreting services is dependent on the engagement and communication strategy. NCR’s Access and Outreach staff will work with staff to determine interpretation service such as:

- Contract or professional interpreters;
- Bilingual City staff trained in interpreting;

- Professional telephone interpreters;
- Competent volunteer interpreters.

*Requested (contract) interpretation services:* Contracted interpreters are typically used for planned interactions between City staff and LEP residents regarding public development or construction plans, accessing City functions, program and service delivery, resolving complaints or issues, or meetings involving making a decision effecting City operations or communities.

*Immediate interpretation services:* Refers to on-site interactions between LEP residents with direct service, field or at-the-counter City staff. These are unplanned interactions with LEP residents where City staff was unable to request interpreters. To effectively communicate, bilingual City staff or phone interpretation services are utilized to relay information or deliver the service.

Situations where bilingual staff is unavailable and using phone interpretation services is insufficient; utilize the phone interpreter to schedule a follow-up appointment where an in-person interpreter will be present. Contact NCR's Access and Outreach Manager for consultation on engaging the LEP resident. Please visit the *Community Engagement and Multilingual Services* page on NCR's CityTalk webpage for more information.

### **How to request interpretation services**

The City of Minneapolis has contracts with several vendors for interpretation services. Language contracts and requests are managed by NCR. Vendor billing is charged to the department requesting interpreting services.

NCR cannot guarantee a contracted interpreter immediately upon request; for this reason, seven days advance notification is recommended to secure services.

*1. Identify languages needed for interpretation:*

Reference the "Definition for language services" (Page 11) and "Definitions for identification" (Page 11) sections as guidelines to indicate needed services.

*2. Contact NCR Access and Outreach staff for interpretation needs:*

Interpreting can be provided in a variety of ways. NCR provides consultation for interpretation services by assisting City staff to identify which services to utilize.

For frequent contact with individuals who speak limited or no English, please contact the Access and Outreach Manager at 612-673-3737 to discuss how best to handle interpretation needs. Visit the *Community Engagement and Multilingual Services* page on NCR's CityTalk webpage for more information.

### **How to access a telephone interpreter**

In the event of vendor unavailability, staff can use telephone interpreters for immediate interpretation. Phone interpreters can also be used for unplanned interactions with LEP

residents. For example, at-counter meetings like the Minneapolis Development Review Center or Utility Billing.

Other uses include shorter interactions (less than 30 minutes) where phone interpretation is more cost effective than securing a contract interpreter (who charges by the hour). For example, field staff interacting with LEP residents such as housing inspectors or City property assessors.

Please visit the *Community Engagement and Multilingual Services* page on NCR's CityTalk webpage for more information on telephone interpreters.

### **How to administer a waiver of the right to an interpreter**

After working through the telephone interpreter and ensuring that the individual waiving services can read in his or her preferred language, use the *Waiver of Interpreter Services* form online at CityTalk. Click on "Work Tools" and then on "Language and Translation Services."

## **Procedures for translation**

### **Types of translation services**

Translation service needs are dependent on the engagement and communication strategy. NCR's Access and Outreach staff will work with staff to determine translation services such as:

- Contract or freelance professional translators or by contract interpreters providing oral, on-site translation;
- Access and Outreach staff;
- Bilingual City staff trained in translation;
- Professional telephone interpreters providing oral translation of written documents;
- Competent volunteer translators.

### **How to request translation services**

The City of Minneapolis has contracts with several vendors for written translation of information and materials. Language contracts and requests are managed by NCR. Vendor billing is charged to the department requesting translation services.

NCR cannot guarantee a contracted translator immediately upon request; for this reason, two weeks advance notification is recommended to secure services.

1. *Identify which language the translation should be in.*

Reference the "Definition for language services" (Page 11) and "Definitions for identification" (Page 11) sections as guidelines to indicate needed services.

2. *Call NCR's Access and Outreach staff*

Requests should be made two weeks in advance. Depending on the document or material size and content, time is needed to translate and administer a quality check to ensure effectiveness messaging. Translation will be done by an internal (staff) or external (contract vendor) translation process.

3. *Checking accuracy of translated materials*

Following the translation process, NCR's Access and Outreach staff will issue a quality assurance check. This is to review the effectiveness and accuracy of the translated content.

4. *Message distribution*

NCR's Access and Outreach staff works with City staff to identify communications distribution of translated materials.

For frequent contact with individuals who speak limited or no English, please contact the Access and Outreach Manager at 612-673-3737 to discuss how best to handle translation needs. Please visit the *Community Engagement and Multilingual Services* page on NCR's CityTalk webpage for more information.

**How to access translation services provided by a telephone interpreter**

If staff is not available and you need an interpreter immediately to provide on-site translation of a document, contact the City's contracted telephone interpreting vendor. For online instructions on accessing a telephone interpreter, please visit the *Community Engagement and Multilingual Services* page on NCR's CityTalk webpage.

## **Procedures for training**

**How to design and deliver department-level LEP services, procedures and engagement strategies**

NCR's Access and Outreach staff will design in-house training guidelines to assist departments in developing and implementing engagement strategies to communicate and provide services to LEP communities. Training covers direct-level services such as protocols and exercises for service delivery staff. Secondly, education and consultation on Minneapolis cultural communities, dynamics and structure, and how to utilize language service tools for effective engagement. For example, recognizing the Somali and Hmong communities are oral-communicators. A method of engagement is utilizing media (radio, tv, etc...) and face-to-face interactions (community based organizations, mosques, churches, etc...) as mediums to disseminate information.

## **Procedures for Boards and Commissions**

**Obtaining language services for board and commission members**

The City Clerk's Office is responsible for managing the board and commission appointment process. The Clerk's office produces applications in four of the City's primary languages: English, Spanish, Hmong and Somali. Residents may access the applications both online and in paper format.

Applications will have a notice which:

- Informs LEP individuals that boards and commissions in the City of Minneapolis operate in English; and
- The LEP individual may request language services upon appointment.

This notice is to be shared in other informative materials relating to the board and commission appointment process. Filling out the application in Spanish, Hmong or Somali does not automatically qualify a LEP resident to receive language services. The resident must request interpretation and translation services.

### **Procedures for providing language services to appointed members**

#### *1. Request for accommodations*

Informational materials and applications will have a notice informing appointed members that boards and commissions conduct meetings in English and language services are available upon request.

#### *2. Intake process to identify language needs*

Department staff and appointed members discuss expectations and level of accommodations. NCR's Access and Outreach staff can assist in the discussion and determining the level of needed service.

The discussion should cover standing meeting dates and provided interpreters, non-attendance and cancellation processes, translation accommodations for meeting agendas and minutes, and process for review of other Appointed Boards and Commissions materials and documents.

#### *3. Providing language service needs*

Following the intake process, department staff works with NCR's Access and Outreach staff to schedule requested language services.

#### *4. Monitoring language services for Appointed Boards and Commissions*

NCR's Access and Outreach staff will work with department staff to monitor language services for boards and commissions and quality assurance review. NCR will track and gather data of language service usage for all boards and commissions.

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## **6. Human Resources practices**

**This chapter includes:**

- **Context and options for hiring**
- **Accessing bi-multi-lingual staff**

## Context and options for hiring

Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Bi- or Multi-language needs will be addressed if they are bona fide occupational qualifications. A "bona fide occupational qualification" is one that is essential to the effective performance of the job.

When individuals are sought for positions in which they interact with LEP residents, language skills may be a "bona fide" or relevant job qualification.

### Language skill needs may be addressed in any one of three ways:

1. Create new positions for and hire full-time or part-time employees within departments using standard hiring processes.
2. Reclassify an existing position. If the need for interpretation and translation services is high and is expected to be long-term, departments may redefine a position to include the required language skill(s) and request Human Resources to study the work and create the position. This request must be made before filling a vacant position.
3. Include the language skills as a "desirable" qualification in job announcements.

If bilingual or multilingual skills are included in the job description, a candidate's language proficiency should be assessed as part of the selection process. Assessment may include:

- Formal testing of language proficiency or interpreting/translation ability; and certification, transcripts, diplomas or other evidence of language proficiency in English or other language; or
- Certification, transcripts, diplomas or other evidence of training in interpreting and/or translation.

**How an employee who provides interpretation and/or translation services is compensated will depend on whether the service is an essential function of the job and will be determined by the City's Human Resources Department.**

If interpreting/translating is an essential job function of the position, the position will be classified appropriately, ensuring the job is valued including the competency. Compensation will be within the City's legal guidelines.

A second option for compensating the employee with additional language skill(s), whether essential or simply valued, is to value the skill delivery with a supplemental premium. There are two options for the implementation of a supplemental premium: 1) the premium may be paid for simply having the skill; 2) the premium may be paid only for using the skill. The department's business needs will determine how it is implemented.



If interpreting and translating skills are desirable qualifications, but not an essential function of the job, department management may, under many circumstances, require a qualified employee to perform this function within the category of “other duties as assigned.” If the service delivery is included in the “other duties as assigned”, the duties should not exceed an average of 40% of the employee’s work time.

The salary/wage scales and premiums for employees are defined in the labor contracts for represented employees and in the Non-represented Employee Salary/Wage Schedules for non-represented employees.

Departments should work with their respective HR Generalist to enable one or more of the above described delivery models.

## **Accessing Bi- Multi-lingual Staff**

Once the position(s) and compensation elements are defined within the context of the department’s business need, standard hiring procedures will be followed.

Positions may be modified or created to acknowledge the need for additional language proficiencies.

Departments should work with their respective HR Generalist to enable the desired service delivery.

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# 7. Carrying Out the Plan

This chapter includes:

- **Implementation timeline**
- **Monitoring and updating the plan**
- **Role of the Access and Outreach Manager**
- **Resolving complaints about Language Access services**

## Implementation timeline

The revised Language Access Plan is to be implemented at the beginning of January 2016. To ensure the efficacy of the plan, NCR will focus on three delivery components during the 2016 year.

- **Training:** conducted sessions to review plan updates, how to determine language service needs, exercises for at-counter and service staff on interacting with LEP individuals, and new procedures and policies;
- **Consultation and technical support:** work with City staff to assess and develop engagement and communication strategies to interface with diverse LEP communities; and
- **Monitoring and quality assurance:** gathering data on language contract use, track resident usage of 311 and NCR's language line systems, synthesize information to identify primary languages and needs, troubleshoot LEP interactions, review translated materials, and assess interpretation services.

Collected data assists in increasing capacity of enterprise operations via:

- Department business and communication plans to include service utilization by LEP residents;
- Department budget's include language service costs; and
- Expanding language contracts and quality vendors.

## Monitoring and updating the plan

Minneapolis' Language Access Plan is assessed and updated every two year. Updating is the responsibility of NCR's Access and Outreach Manager. The evaluation will include:

- Identification of the number of Minneapolis residents with LEP and possible recalculation of the City's primary language groups;
- Assessment of the current level of services delivered to LEP individuals by each City charter department;
- Reporting of training levels of City staff regarding multilingual services;
- Reporting of progress made by individual departments;
- Review of City language contract use, engagement strategies and communication mediums; and
- Feedback and comments from LEP communities, including community organizations and advocacy groups, on the effectiveness of the City's multilingual services.

## Role of the Access and Outreach Manager

The Access and Outreach Manager oversees the development and implementation of the citywide Language Access Plan and manages the day-to-day operations of the City's Access and Outreach staff. NCR's Access and Outreach staff is charged with working collaboratively across City departments and with community organizations in order to

improve the accessibility of City services to residents who are non-or limited English speakers.

Primary Responsibilities:

- Oversee operations in NCR's Access and Outreach staff;
- Ensure access point to City services for non-English and limited English speaking City residents are provided;
- Ensure and manage prompt, in-person and telephone interpretation and assistance is provided;
- Develop and maintain relationships with community based organizations and governmental units in order to facilitate communication about and coordination of services and needs;
- Inform City staff, management, and elected officials about the issues facing limited and non-English speaking persons and their ability to integrate into the economic and social community of Minneapolis;
- Track volume of requests for services and evaluate the effectiveness of initiatives in meeting the goal of assisting limited and non-English speaking individuals;
- Develop and manage contracts and budgets;
- Lead citywide Language Access planning process and work with the City Coordinator's Office to implement, adapt, monitor and update the Language Access Plan;
- Work closely with the Accessibility Liaison Network to identify and implement short and long term solutions to LEP clientele of City services;
- Provide assistance to City departments responding to multilingual challenges and facilitate relationships with LEP persons and organizations, e.g., in communicating snow emergencies and other city activities to Hmong, Spanish, and Somali speaking communities, coordinating translation of signage and public documents for the City, and acting as information clearing house and contact for departments about immigration activities in the City.

## **Resolving complaints about language-based services**

Complaint pathways will address customer concerns regarding poor customer service or the timeliness or quality of interpreter services. The complaints may be made in a number of ways: face to face, by telephone or in writing via the U.S. mail or email to the Access and Outreach Manager.

Departments will follow their established complaint procedures for LEP persons to make complaints about services received. Departments will document actions taken to resolve each complaint in a timely manner. To ensure continuous improvement for language services, the City will seek input from non-English or limited English proficient communities, as well as community-based and advocacy organizations that work and interact with LEP communities.

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# 8. Resources and References

## This chapter includes:

### Print resources

(attached)

- A. Report on MPLS Language Access services as of September 2015
- B. How to calculate primary languages
- C. “Safe harbors provision” of Department of Justice guidance on vital documents and primary languages
- D. Members of the Accessibility Liaison Network

### Online resources

(available on the Internet or through CityTalk, Minneapolis city intranet, as indicated)

- E. Online general resources
- F. Resources for LEP service
- G. Resources for notice
- H. Resources for identification
- I. Resources for interpreting
- J. Resources for translation
- K. Resources for hiring

## **Appendix A:**

### **Minneapolis Language Access Services, 2015**

# **Services Offered In Minneapolis City Departments For People With Limited English Proficiency**

RESULTS FROM ENGAGING CITY DEPARTMENTS REGARDING LANGUAGE SERVICE DELIVERY

Prepared by the Minneapolis Neighborhood and Community Relations Department



## I. Overview

In 2015, the Neighborhood and Community Relations (NCR) Department revisited the 2004 Limited English Proficiency Plan; updating it to reflect current enterprise practices and renaming it as the Language Access Plan. The Accessibility Liaison Network convened early June 2015 and assisted in identifying program managers and staff overseeing City services delivery. City staff was engaged to discuss current language practices in their operations. Furthermore, to identify departments needs in improving service delivery in alternative languages.

Information collected and assessed during this process drives the next steps to how language services are delivered enterprise-wide. NCR will work with departments and members of the Accessibility Liaison Network to implement training to City staff about available multilingual service tools and resources at their disposal. Additionally, NCR's Access and Outreach staff will provide consultation on engagement strategies to effectively communicate with Minneapolis' LEP communities.

Note that this report gives only a snapshot of the city enterprise and its language practices in 2015. Not all City divisions and programs were engaged about their program and service delivery to LEP residents. Conversations held were not an evaluation of the quality or comprehensiveness of City services. To give a thorough snapshot of the enterprise, departments with frequent LEP resident contact and/or responsible for managing space where LEP residents can access City services were interviewed. These are departments such as 311 (the City's customer service interface) or the Minneapolis Development Review Customer Service Center (staffed by Regulatory Services and the Community Planning and Economic Development department).

Findings include:

- City is in compliance with meeting LEP requirements;
- Need for clarification, training and consultation for staff on when to utilize interpreting and translation tools to communicate with LEP residents; and
- Need to track and monitor utilization of City services based on the language of residents.

## II. Methodology

In June 2015, NCR convened the Accessibility Liaison Network as part of the Americans with Disabilities Act evaluation and Limited English Proficiency Plan update. The network identified program managers and key staff to discuss the operations and delivery of their respective programs, services and/or activities. Establishing dialogues around accessibility, NCR held conversations around service delivery to LEP residents.

The format of the conversation covered:

- Identifying LEP-related services;
- Mechanisms to track and gather data of service utilization by LEP residents;

- Identifying resources, tools and/or services used to communicate with LEP residents; and
- Opportunities for the department or NCR to improve interactions with LEP residents.

### **III. Findings**

#### **Identifying LEP-related services**

Department managers and staff were asked to list programs, services and activities which have contact with and are used by LEP residents. Staff used the listed components below to identify LEP operations.

- The program, service or activity is federally funded;
- Financial implications for the resident;
- Involves a decision-making process;
- Volume: the program or service operating in a geographic area with dense LEP populations or frequent usage of programs/services.

A by-product of this process was multiple staff inquiring about where and how to increase interactions of LEP communities. The conversation revolved around the notion of access and equity for LEP residents to fully and effectively participate. Therefore, this process additionally allowed departments to identify where proactive engagement strategies should and/or are considered to interface with LEP residents.

Department	Programs and Services
311	<ul style="list-style-type: none"> <li>• City information and services</li> </ul>
911	<ul style="list-style-type: none"> <li>• Emergency call center</li> </ul>
Assessor	<ul style="list-style-type: none"> <li>• Property inspections</li> <li>• Property tax programs</li> <li>• Property valuation reviews and appeals</li> </ul>
City Attorney	<ul style="list-style-type: none"> <li>• Provide legal opinions</li> <li>• Criminal prosecution and victim and witness contact</li> </ul>
Convention Center	<ul style="list-style-type: none"> <li>• Host and manage Convention Center’s public and private events, meetings and national conventions</li> </ul>
City Clerk	<ul style="list-style-type: none"> <li>• Elections and voter services</li> <li>• Boards and commissions</li> <li>• Legislative support</li> <li>• Records and information management</li> </ul>
Civil Rights	<ul style="list-style-type: none"> <li>• Investigate complaints of discrimination in Minneapolis</li> <li>• Review complaints against the Minneapolis Police Department</li> </ul>
Communications	<ul style="list-style-type: none"> <li>• Provide communication assistance to City departments so the people of Minneapolis are aware of and have access to City news, information and services</li> <li>• Manage top-level enterprise content for City’s website</li> <li>• Produce original video productions for internal and external audiences</li> <li>• Provide limited graphic design support</li> </ul>
Community Planning and Economic Development	<ul style="list-style-type: none"> <li>• Affordable and rental housing assistance programs</li> <li>• Building inspections</li> <li>• Business license and permit counter issuance</li> <li>• Code compliance</li> <li>• Community and long range planning</li> <li>• Construction inspections</li> <li>• Economic development assistance</li> <li>• Employment and training</li> <li>• False burglar alarm user fees</li> <li>• Plan review</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Billing for water/sanitation and manage call-in and walk-in centers</li> </ul>
Fire	<ul style="list-style-type: none"> <li>• EMS</li> <li>• Fire education</li> <li>• Fire prevention</li> <li>• Fire suppression</li> <li>• Rescue</li> </ul>

Health	<ul style="list-style-type: none"> <li>• Administrative support</li> <li>• Emergency preparedness</li> <li>• Environmental services</li> <li>• Food, lodging, pools</li> <li>• Healthy living and start</li> <li>• Healthy homes and environment</li> <li>• Lead and healthy homes</li> <li>• Maternal and child health assurance</li> <li>• Public health accreditation and quality improvement</li> <li>• School based clinics</li> <li>• Teen pregnancy prevention</li> <li>• UCARE skyway senior center</li> <li>• Youth violence prevention</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Manage employee hiring process</li> </ul>
Information and Technology	<ul style="list-style-type: none"> <li>• Digital inclusion engagement</li> <li>• Management of City website</li> <li>• Supervision of telecommunication administrators for the City’s general phone lines</li> </ul>
Regulatory Services	<ul style="list-style-type: none"> <li>• Animal Care and Control</li> <li>• Appeals and assessment hearing</li> <li>• Community engagement</li> <li>• Fire inspections</li> <li>• Housing inspections</li> <li>• Traffic and parking enforcement</li> </ul>
Police	<ul style="list-style-type: none"> <li>• Crime prevention</li> <li>• Investigations</li> <li>• Precinct-level services</li> <li>• Records information</li> <li>• Property and evidence</li> <li>• Recruitment</li> </ul>
Public Works	<ul style="list-style-type: none"> <li>• Solid waste and recycling services, clean City programs</li> <li>• Water and sewer services</li> <li>• City-owned parking facilities (on-street and off-street/ramps), traffic systems, skyways, vehicle impound lot, permits for block events</li> <li>• Snow and ice control, street sweeping, sidewalks</li> <li>• Gopher State One-call for Minneapolis</li> <li>• Public construction and maintenance projects; including public notice, community involvement</li> <li>• Special assessment processes</li> </ul>

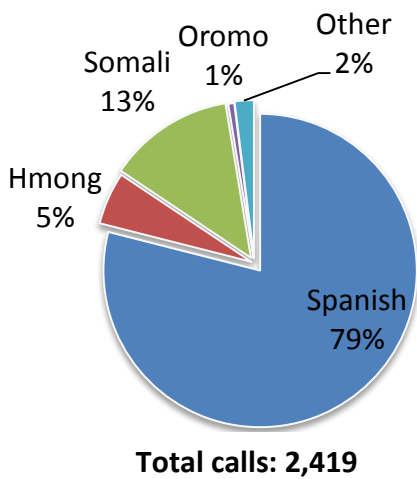
## Mechanisms to track and gather data of service utilization

From a high-level operations perspective, the City of Minneapolis has improved its methods for collecting data on LEP service utilization. One indicator is the use of contracted language vendors by departments. NCR manages the majority of the City's contracted language vendors, with the exception of the Health Department, Police, and 911 (who manages their own contracts). NCR works with departments in processing and scheduling requested interpreting and translation services.

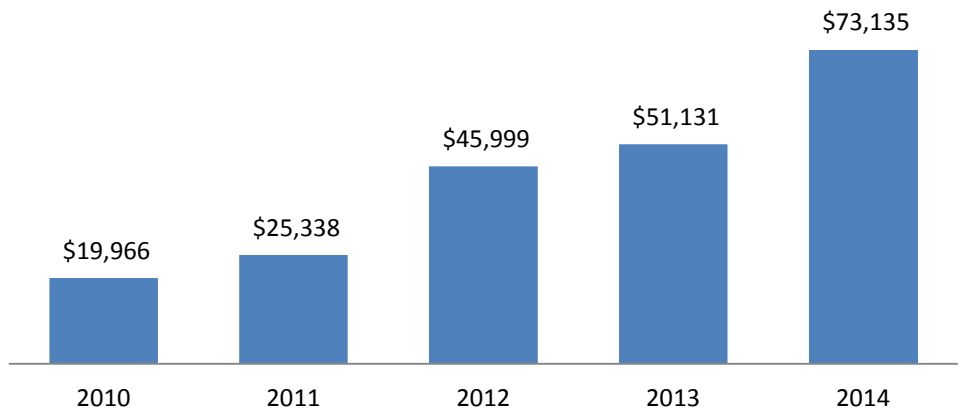
Data available for review:

- Total amount spent by department;
- Interpretation, translation, and/or American Sign Language services;
- When services were used; and
- Costs, duration and language of phone interpretation.

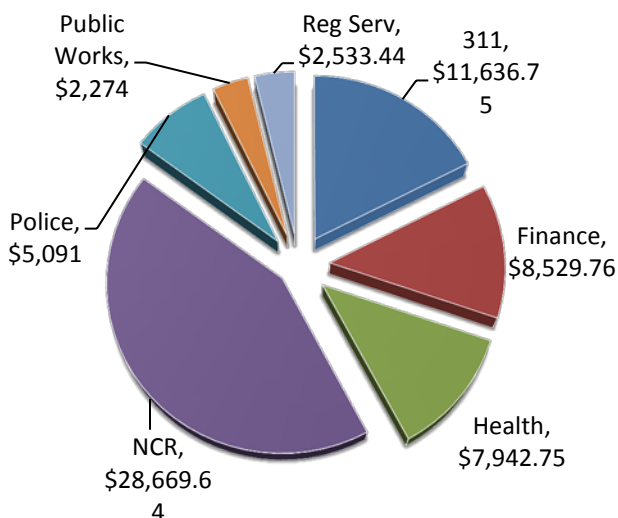
### # of Language Line calls (2014)



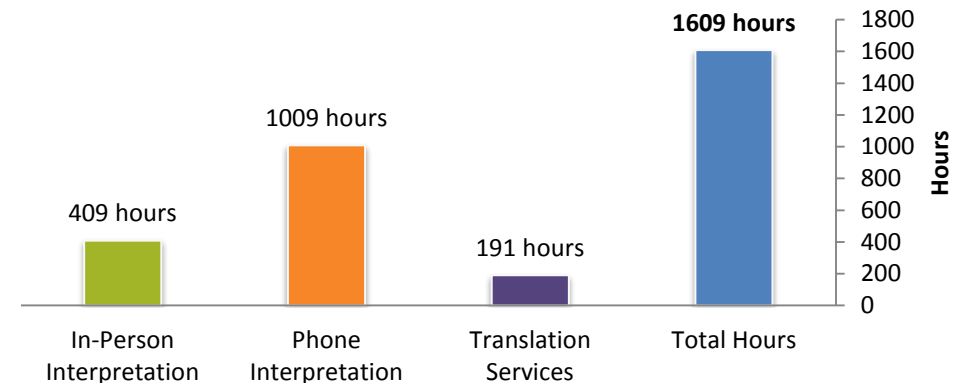
### Contracted language services expenditure (5-years)



### Contract language service expenditures (top 8 depts.)



### Contracted language service hours (2014)



## **Resources, tools and services used to communicate with LEP residents**

### *I-speak cards*

A majority of City departments features an “I-speak” card at the front counter for residents to identify needing a language accommodation.

### *Bilingual staff*

As with the previous 2004 plan, employing bi-lingual staff continues to be the most commonly used method of communicating with LEP residents. Interviews demonstrated bilingual staff as the most convenient method. This often occurs during at-counter or unplanned interactions where there is no time to request interpreters.

### *Phone interpretation services*

In 2013 and 2014, nearly half of the City departments used phone interpretation services. The majority of phone interpretation was used by NCR, 311, Utility Billing and Police. Other staff primarily used phone interpreters in the field when engaging with LEP residents.

### *Requested interpretation and translation services*

Annually, use of interpretation and translation contracts continues to increase (as mentioned in the previous section).

### *NCR’s Access and Outreach staff*

The Access and Outreach staff works as liaison connecting under-represented communities with City departments, programs and services. Through a consulting capacity, AO work with departments to advise on strategies to engage and connect with Minneapolis’ diverse communities.

## **Opportunities for the City to improve interactions with LEP residents**

Staff interviewed expressed a need for more training and education. Conversations revealed a gap of knowledge of when and how to deliver language services, available tools and services at their disposal, and/or how to access them. Trainings must include culturally appropriate strategies to disseminate and convey information across Minneapolis’ LEP communities. At-counter and direct-service delivery oriented support and protocols for unplanned interactions.

The City can improve its practice of tracking service utilization and interactions at a division and program level. There are many encounters and interactions not recorded and accounted for; such as, bilingual staff assisting LEP residents. Although reviewing language contracts are good methods, at best, it’s an overview and not a detailed portrait. There are no reporting fields to demonstrate quality and effectiveness of these interactions. Furthermore, only a select few departments review use of language contracts.

## Appendix B:

### How to calculate primary languages

Every year, the primary languages in Minneapolis are calculated using a formula that extrapolates data from the Minneapolis Public Schools and the most recent census. The formula is used to identify which languages are spoken by at least 1,000 Minneapolis residents as their primary language.

The formula,  $X/Y \times Z$ , is used where Y = the number of Minneapolis public school students (33,505 in for the 2014-2015 school year), X = the total population of Minneapolis (400,070 in 2014), and Z the number of Minneapolis school students who report speaking a specific language other than English at home. (Both the Y and Z variables are available at: <http://cfl.state.mn.us/datactr/language/index.htm> and the X variable are available at the U.S. Census and American Community Survey websites).

Once the number of LEP residents is computed by language, the language groups can be listed in order of size and the 1,000 resident cut off can be applied. For instance, 251 students reported speaking Vietnamese at home, so  $400,070/33,505 \times 251$ , or an estimated 3,003 Minneapolis residents speak Vietnamese as their primary language. Since this is over 1,000 residents, Vietnamese would be included. Conversely, 78 students said they speak Lao at home. So, an estimated  $400,070/33,505 \times 78 = 931$  Cambodian-speaking residents live in Minneapolis and therefore, Lao would not be included.

This formula is used because it can be updated annually (the two main variables are recounted at the beginning of each school year) and it is more directly tied to language rather than the other population-based data sources that are based on ethnicity or country of origin. It is not, however, an exact measure of the LEP community, because of the recognized undercounting of minority populations in the US Census. Further, some immigrant groups (such as Russians, who are on average, older at immigration) might have fewer children in the Minneapolis school system than other groups.

## Appendix C:

### Department of Justice Guidance Memorandum

Section on safe harbors Federal Register Doc 0320179 HHS revised guidance for LEP (August 8, 2003)

“Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights or services is an important part of “meaningful access.” Lack of awareness that a particular program, right, or service exists may effectively deny LEP individuals meaningful access. Thus, where a recipient is engaged in community outreach activities in furtherance of its activities, it should regularly assess the needs of the populations frequently encountered or affected by the program or activity to determine whether certain critical outreach materials should be translated. In determining what outreach materials may be most useful to translate, such recipients may want to consider consulting with appropriate community organizations. Sometimes a document includes both vital and nonvital information. This may be the case when the document is very large. It may also be the case when the title and a phone number for obtaining more information on the contents of the document in frequently-encountered languages other than English is critical, but the document is sent out to the general public and cannot reasonably be translated into many languages. Thus, vital information may include, for instance, the provision [[Page 47319]] of information in appropriate languages other than English regarding where a LEP person might obtain an interpretation or translation of the document.

Given the foregoing considerations, vital written materials could include, for example:

- Consent and complaint forms;
- Intake forms with the potential for important consequences;
- Written notices of eligibility criteria, rights, denial, loss, or decreases in benefits or services, actions affecting parental custody or child support, and other hearings;
- Notices advising LEP persons of free language assistance;
- Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which knowing English is not required; and
- Applications to participate in a recipient's program or activity or to receive recipient benefits or services.

Nonvital written materials could include:

- Hospital menus;
- Third party documents, forms, or pamphlets distributed by a recipient as a public service;



- For a non-governmental recipient, government documents and forms;
- Large documents such as enrollment handbooks (although vital information contained in large documents may need to be translated); and
- General information about the program intended for informational purposes only.

### *Into What Languages Should Documents be Translated?*

The languages spoken by the LEP individuals with whom the recipient has contact determine the languages into which vital documents should be translated. A distinction should be made, however, between languages that are frequently encountered by a recipient and less commonly-encountered languages. Some recipients may serve communities in large cities or across the country. They regularly serve LEP persons who speak dozens and sometimes over 100 different languages. To translate all written materials into all of those languages is unrealistic. Although recent technological advances have made it easier for recipients to store and share translated documents, such an undertaking would incur substantial costs and require substantial resources. Nevertheless, well-substantiated claims of lack of resources to translate all vital documents into dozens of languages do not necessarily relieve the recipient of the obligation to translate those documents into at least several of the more frequently-encountered languages and to set benchmarks for continued translations into the remaining languages over time. As a result, the extent of the recipient's obligation to provide written translations of documents should be determined by the recipient on a case-by-case basis, looking at the totality of the circumstances in light of the four-factor analysis. Because translation is usually a one-time expense, consideration should be given to whether the up-front cost of translating a document (as opposed to oral interpretation) should be amortized over the likely lifespan of the document when applying this four-factor analysis.”

## Appendix D:

### Members of the Accessibility Liaison Network

Department	Liaison	Phone	Email
311	Diane Nelson Leah Skjefte	612.673.5925 612.673.5975	<a href="mailto:diane.nelson@minneapolismn.gov">diane.nelson@minneapolismn.gov</a> <a href="mailto:leah.skjefte@minneapolismn.gov">leah.skjefte@minneapolismn.gov</a>
911	Christine McPherson	612.673.5918	<a href="mailto:christine.mcpherson@minneapolismn.gov">christine.mcpherson@minneapolismn.gov</a>
City Assessor	Paul Grace	612.673.2392	<a href="mailto:paul.grace@minneapolismn.gov">paul.grace@minneapolismn.gov</a>
City Attorney	Colleen O'Brien	612.673.2966	<a href="mailto:colleen.obrien@minneapolismn.gov">colleen.obrien@minneapolismn.gov</a>
City Clerk/Mayor/Council	Tim Schwarz	612.673.3136	<a href="mailto:tim.schwarz@minneapolismn.gov">tim.schwarz@minneapolismn.gov</a>
Civil Rights	Faith Jackson	612.673.2697	<a href="mailto:faith.jackson@minneapolismn.gov">faith.jackson@minneapolismn.gov</a>
Communications	Elizabeth Haugen	612.673.2009	<a href="mailto:elizabeth.haugen@minneapolismn.gov">elizabeth.haugen@minneapolismn.gov</a>
CPED	Greg Simbeck	612.673.3773	<a href="mailto:greg.simbeck@minneapolismn.gov">greg.simbeck@minneapolismn.gov</a>
Convention Center	Nancy Nyberg	612.335.6372	<a href="mailto:nancy.nyberg@minneapolismn.gov">nancy.nyberg@minneapolismn.gov</a>
Finance	Ellen Velasco- Thompson	612.673.3994	<a href="mailto:evt@minneapolismn.gov">evt@minneapolismn.gov</a>
Fire Department	Casidy Anderson	612.673.3184	<a href="mailto:casidy.anderson@minneapolismn.gov">casidy.anderson@minneapolismn.gov</a>
Health	Ken Smith	612.673.3567	<a href="mailto:kenneth.smith@minneapolismn.gov">kenneth.smith@minneapolismn.gov</a>
Human Resource	Jill Petty	612.673.3108	<a href="mailto:jill.petty@minneapolismn.gov">jill.petty@minneapolismn.gov</a>
Intergovernmental Relations	Matt Bower	612.673.2188	<a href="mailto:matthew.bower@minneapolismn.gov">matthew.bower@minneapolismn.gov</a>
IT	Tamara Bredemus	612.673.5486	<a href="mailto:tamara.bredemus@minneapolismn.gov">tamara.bredemus@minneapolismn.gov</a>
Police Department	Daniel Boody	612.673.2338	<a href="mailto:daniel.boody@minneapolismn.gov">daniel.boody@minneapolismn.gov</a>
Public Works	Monique Cuff	612.673.3514	<a href="mailto:monique.cuff@minneapolismn.gov">monique.cuff@minneapolismn.gov</a>
Regulatory Services	Elizabeth (Beth) Held	612.673.2953	<a href="mailto:elizabeth.held@minneapolismn.gov">elizabeth.held@minneapolismn.gov</a>

## Appendix E:

### Online general resources

**Minnesota State Demographic Center**

[www.mn.gov/admin/demography](http://www.mn.gov/admin/demography)

**Minneapolis Public School data, MN Department of Education Data Center**

[www.education.state.mn.us/](http://www.education.state.mn.us/)

**United State Census Information**

[www.census.gov](http://www.census.gov)

**Nonprofit Organizations of Color in Minnesota**

[www.cura.umn.edu](http://www.cura.umn.edu)

## Appendix F:

### Online resources for LEP service

**LEP.gov: Meaningful access for people who are limited English proficient**

An electronic clearinghouse run by the federal government, providing and linking to information, tools, and technical assistance regarding Limited English Proficiency and language services for federal agencies, recipients of federal funds, users of federal programs and federally assisted programs, and other stakeholders.

[www.lep.gov](http://www.lep.gov)

**Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs**

Language Access Guidance Materials, located under *DOJ LEP Guidance for Recipients*

[www.lep.gov](http://www.lep.gov)

## Appendix G:

### Online resources for notice

**“Free interpreter services are available” poster**

Downloadable PDF templates of poster in various languages giving notice of right to service

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

**“Attention: If you want free help translating this information” block**

Downloadable PDF of “language block” template

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

## Appendix H:

### Online resources for identification

#### **“I Speak” cards**

Downloadable PDF templates of flashcards to help identify an LEP individual’s preferred language

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

## Appendix I:

### Online resources for interpreting

#### **Accessing telephone interpreting services**

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

#### **Accessing telephone interpreting services**

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

#### **“Waiver of rights to free interpreting services” form**

Downloadable PDF of form to allow LEP individual to decline offer of free interpreting services

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

## Appendix J:

### Online resources for translation

#### **Accessing translation services**

See CityTalk. Click on “Work Tools” and then on “Language and Translation Services”

## Appendix K:

### Online resources for hiring

#### **Information for City hires, such as:**

- Job description when language skills are “highly desirable”; and
- Job description when an interpreter is being hired.

See CityTalk. Click on “Departments,” “Human Resources,” and then on “HR Generalists.”