


<b>Category:</b>	Agency	<p style="text-align: center;"><b>INCA Community Services Agency Policy</b></p> 
<b>Sub Category:</b>		
<b>Effective Date:</b>	2/28/17	
<b>Revised Date:</b>		
<b>Forms:</b>	Discrimination Complaint Form	
Responsible: EOO Officer, Management		

## Limited English Proficiency Policy

### Purpose/Introduction

The Limited English Proficiency Policy has been prepared to address INCA Community Services, Inc. responsibility as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The policy has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000D, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

### Title VI Guidelines

Title VI of the 1964 Civil Rights Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act provides that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance. This includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (i.e. recipients of federal funding) must provide meaningful access to LEP customers.

### Policy

INCA Community Services, Inc. will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits. This policy provides for communication of information of documents applicable to the agency. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served. Customers and their families will be informed of the availability of such assistance free of charge.

### Procedures

#### 1. Identifying LEP Persons and Their Language

- INCA will promptly identify the language and communication needs of the LEP

person. If necessary, staff will use a language identification card (or “I speak cards”) or posters to determine the language.

- Records will be kept of past interactions with customers or family members about the language used to communicate with the LEP person.

## **2. Obtain an Interpreter**

The Equal Opportunity Officer will be responsible for:

- Advising staff members on Language Translation apps that can be used to translate quickly and efficiently.
- Maintaining a list showing the name, language, phone number, and hours of availability of all bilingual staff persons.
- Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available.
- Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.
- The LEP may request to use a family member or friend as an interpreter, however it is not required that any person bring their own interpreter to receive services.

## **3. Provide Written Translations**

- Documents will be translated into frequently-encountered languages as needed.
- The website is available in 53 languages.

## **4. Providing Notice to LEP Persons**

INCA will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum notices and signs will be posted and provided in foyers of county offices and website. Notification will also be provided through one or more of the following: outreach documents, advertisements, and/or community based events.

## **5. Monitoring Language Needs and Implementation**

On an ongoing basis, INCA will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, INCA will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from customers, and community organizations.

## **Documentation Required**

1. Intake Form

## **Definitions**

**Limited English Proficiency (LEP)** - a person who has limited English speaking skills.

**Interpreter/Translator** - a person who interprets, especially one who translates speech orally.

**Title VI of the 1964 Civil Rights Act** - was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

**Language Translation apps** - cell phone applications that allow for the translation of languages

by speaking or typing into them as needed.

**Dissemination of Policy**

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.