

# Language Access Plan



**City of Norwalk, Connecticut**  
**Approved March 12, 2013**

# **Language Access Plan**

## **I. Introduction/Statement of Purpose**

- A. Many individuals living in Norwalk, Connecticut read, write, speak and understand English. There are many individuals, however, for whom English is not their primary language and who have limited English proficiency. Individuals who are “limited English proficient” (LEP) are so on account of their national origin, and are therefore unable to read, write, speak or understand the English language effectively. Based on 2005-2009 American Community Survey (ACS) data from the U.S. Census Bureau, approximately 14.6% of Norwalk’s population can be considered LEP. The five most commonly spoken languages among Norwalk’s LEP population are: Spanish (10.6%), Greek (0.8%), Italian (0.6%), French (0.5%), French-Creole (0.4%); herein referred to as the “targeted languages.”
- B. In order to further the public safety, health, convenience, comfort, property and general welfare of all of Norwalk’s citizens, the City of Norwalk has written a Language Access Plan (LAP) to establish the standards and procedures for providing language assistance to LEP persons. Although compliance with the LAP is the responsibility of all City departments, the Language Access Coordinator will oversee its implementation and monitor its effectiveness. Each department shall have a Language Access Captain, the Department head or his/her nominee, who is responsible for reporting information to the Language Access Coordinator and disseminating information from the Language Access Coordinator to departmental employees.

## **II. Identifying LEP Individuals Who Need Language Assistance**

- A. In order to provide accurate language assistance to individuals with limited English proficiency (LEP), it is necessary to identify who those people are, and what language they prefer using.
  - 1. The City of Norwalk shall provide Language Identification Cards to each department for LEP customers to use to declare their preferred language.
  - 2. City offices keeping personal records on individuals shall include in their documentation the individual’s preferred language, whether it is English, or another.
  - 3. Notices shall be posted in common areas, and included on documents and brochures which indicate the free availability of language assistance. This will encourage LEP persons to self-identify their needs, so that the City can make arrangements for language services to be provided.

## **III. Ways in which Language Assistance Is Provided**

- A. The reasonable provision of language assistance is the responsibility of the City, rather than the LEP customer. Assistance shall be provided in response to oral and written requests. Available services are listed in the Language Resource Guide provided to each City department, which should be referred to when assisting an LEP customer.
- B. Provision of Oral Language (interpretation) Services:
  - 1. Staff members working with in-person customers (herein referred to as the “primary staff member”) needing assistance, shall identify the language of the customer by using the Language Identification Card available in the Language Resource Guide.

- a. Once the preferred language is identified, the primary staff member will display a card asking the customer to please wait while appropriate language assistance is obtained.
  - b. The primary staff member will obtain assistance from a bilingual staff member in the immediate department.
  - c. When a bilingual staff member is not available or able to provide sufficient support, the primary staff member will consult the Language Resource Guide for names of City staff members who are bilingual in the preferred language and then, if necessary, call upon one of the listed individuals or community organizations willing to provide volunteer assistance.
  - d. If those resources are insufficient, the primary staff member shall use the Language Line phone service to provide appropriate language assistance to the LEP customer.
2. Staff members working with LEP customers over the phone shall identify the language of the caller by using the phonetic script available in the Language Resource Guide.
- a. Once the preferred language is determined, the primary staff member will continue using the phonetic script to ask the caller to hold while assistance is obtained from a bilingual staff member in the immediate department.
  - b. When a bilingual staff member is not available or able to provide sufficient support, the primary staff member will consult the Language Resource Guide for names of City staff members who are bilingual in the preferred language and request their assistance.
  - c. If sufficient assistance is not able to be provided, the primary staff member will use the phonetic script in the Language Resource Guide to collect the caller's name and phone number. The primary staff member shall be responsible for arranging appropriate interpretation services and following up with the customer within a reasonable time-frame, no more than 24 working hours after the contact was made.
3. Oral language services for public meetings or hearings shall be requested at least forty-eight hours in advance of the meeting or hearing for which they are needed.
- a. Instructions for requesting such assistance shall be included in legal notices of hearings and posted on the City's calendar or agenda webpages.
  - b. The procedure for obtaining such services is as follows:
    - i. The LEP person requesting assistance shall visit or call the office coordinating the hearing, in keeping with the instructions provided with the meeting's notice. This contact shall be handled by the primary staff member in the manner listed above for in-person and/or telephone contacts.
    - ii. Upon receipt of the request, email notification shall be sent to the Department's Language Access Captain, who will keep record of the request.
    - iii. The primary staff member shall request oral assistance for the event in the order of:
      - a) A bilingual staff member of the department holding the meeting/hearing.

- b) A bilingual staff member of a different city department.
    - c) A bilingual person from a community organizations and/or volunteer listed in the Language Resource Guide.
    - d) If no staff member or community organization/volunteer is available to attend the meeting, the primary staff member shall arrange for a Language Line on-site interpreter to be available.
  - c. Following a meeting/hearing with language assistance provided, the primary contact shall document the use of language assistance with the department Captain.
- 4. Oral language assistance shall be provided in a specific order of preference:
  - a. The preferred method of assisting LEP customers shall be the use of competent bilingual staff of the department contacted for in-person and telephone interpreting.
    - i. When an in-department staff member is not available, a bilingual staff member from a different department will be contacted. The Language Resource Guide provides a listing of suitable staff members.
  - b. If a City staff member is unavailable, the Language Resource Guide shall be used to identify a suitable community organization or individual who can provide assistance.
  - c. If sufficient assistance is not able to be provided, City staff shall seek assistance from a professional telephone interpreter, as identified in the Language Resource Guide.
  - d. While City policy does not actively encourage the use of informal interpreters such as family, friends of the LEP person or other customers, informal interpreters may be used if suggested by the customer. The usage of minor children as interpreters shall be generally discouraged and should be used only upon insistence of the customer and with approval of a supervisor, or in emergencies where no alternative is available.
  - e. Telephone interpreters (including staff interpreters) shall not be a preferred method of assisting with in-person contacts and shall be used only if in-person interpreters are unavailable or requesting their presence is impractical given time constraints or expected length of conversation.
  - f. Staff shall be authorized to procure language services when deemed necessary, even when such assistance is not requested or desired by the customer.
  - g. No staff shall suggest or require an LEP customer to provide an interpreter in order to receive services.**
- C. Provision of Written Language Services:
  - 1. Critical documents are defined to be those which are critical to the health, safety and/or welfare.
  - 2. The following procedure shall guide the translation of written materials produced by the City of Norwalk.
    - a. Template documents (internal and external) will be translated upon request.
    - b. Critically important documents will be translated upon request.
    - c. Critically important template documents (forms and applications) will continue to be proactively translated into Spanish, and will be translated upon request into another language.

- d. The City's website content will be able to be translated by any user into one of 65 available languages, including each of the target languages, using Haitian-Creole for French-Creole.
- 3. The preferred means of translating written documents shall be mindful of the costs associated with translation, the timeliness of obtaining professional translations and the need for accurate translations.
  - a. Critical, template documents shall be proactively and professionally translated into Spanish and into other languages upon request.
  - b. Other template documents shall be translated using technological resources such as Google Translate, Babylon and Reference.com, upon request.
    - i. Whenever possible, bilingual staff or volunteers shall be asked to provide a quality check to ensure information contained in electronically-translated materials is accurately translated and can be understood by the reader
  - c. All non-template documents shall be translated upon request using technological resources such as Google Translate, Babylon and Reference.com.
    - i. Whenever possible, bilingual staff or volunteers shall be asked to provide a quality check to ensure information contained in electronically-translated materials is accurately translated and can be understood by the reader.
  - d. If written translations are unavailable, and at the discretion of the primary staff member or his/her supervisor, oral interpretation of written documents can be requested of (in order of preference):
    - i. A department staff member
    - ii. An out of department staff member
- D. Interpreters and translators shall be initially evaluated and continuously monitored for quality of service provided.
  - 1. Bilingual staff must pass a proficiency test administered by an impartial party fluent in the foreign language spoken by staff, and be internally monitored for effectiveness, after receiving training in providing interpretation and translation. If at anytime a staff member is determined to be ineffective, his/her name will be removed from the Language Resource Guide's list of bilingual staff members.
  - 2. Community organizations and volunteers must pass a proficiency test administered by an impartial party fluent in the language in which interpretation/translation services would be provided. If at anytime an approved organization or volunteer is determined to be ineffective, it will be removed from the Language Resource Guide's list of approved community organizations and volunteers.
  - 3. Membership in the American Translators Association is the preferred indicator of a professional interpreter or translator's level of competence.

#### **IV. Training Staff**

- A. City of Norwalk employees shall receive training on effective and efficient provision of language assistance services to LEP persons. This training is developed, coordinated and evaluated by the Personnel department and the Language Access Coordinator.
- B. Employees shall be trained in several manners:
  - 1. Ongoing Training:
    - a. Annual email to all Language Access Captains with the following information, to be distributed to department staff:

- i. Summarization of language services provided
    - ii. Provision of necessary technical advice
    - iii. Update and dissemination of the Language Resource Guide
  - 2. One-time Training:
    - a. New employee orientation
    - b. Interpreting skills training session for identified bilingual staff
    - c. Staff hired prior to the publication of this plan, who routinely interact with the public in the provision of services, shall receive training in 2013.
- C. Training topics shall be expanded and/or continued as appropriate and may include:
  - 1. Education on Title VI of the Civil Rights Act and the legal responsibility to provide meaningful access of government services to non-English speakers.
  - 2. General information about LEP policies, both federal and local
  - 3. Review of Norwalk's Language Access Plan (LAP) and Language Resource Guide, which specifies the procedures for providing language assistance
  - 4. Differences in interpreting and translating
  - 5. Education on how to effectively work with an interpreter
  - 6. Reporting requirements and procedures of the staff to the Language Access Captains and Language Access Coordinator
- D. Bilingual staff shall have additional training on how to use their skills to effectively interpret and/or translate.

**V. Providing Notice to LEP Persons of Services Available (and free of charge)**

- A. The City of Norwalk shall make significant effort to insure LEP persons are aware of their right to free language assistance, and how language assistance can be accessed. These methods of providing notice shall include, but are not limited to:
  - 1. Information about the right to free language assistance and how it can be accessed shall be provided upon adoption of this plan via:
    - a. Notification to community organizations associated with LEP persons
    - b. Signage in common areas, offices and where applications are taken, with statements in target languages providing access information
      - i. "Do you need an interpreter?"
      - ii. "Do you need a document translated?"
      - iii. Regarding the right to language assistance, how it can be accessed and how to file a complaint
  - 2. Instructions for requesting language assistance at public hearings and meetings shall be included in English in legal notices and posted on the City's calendar or agenda webpages.
  - 3. Internal and external template forms shall include notice in the targeted languages that the document can be translated upon request.
  - 4. A multilingual tag line shall be added to all critical documents produced in English, informing the customer that the City will provide language assistance upon request.
  - 5. Mailings shall include a tagline or an insert informing recipients of available language assistance.
  - 6. The Language Access Plan (LAP) shall be available on the city's website via the Human Relations page and by contacting the Language Access Coordinator.

## **VI. Goals of the Language Access Plan**

- A. Through implementation of the LAP and vigilance in the area of equal access to resources, Norwalk hopes to develop stronger relationships with persons of limited English proficiency. In addition, the City of Norwalk shall establish as goals for itself and its citizens:
1. To develop agreements with community organizations and volunteers willing and able to provide language assistance
  2. To provide meaningful access to all city programs and services.
  3. To increase the number of resources available in target languages, with an emphasis on Spanish, the language most commonly spoken by LEP residents of Norwalk
  4. For the municipal administrating agencies to support sub-recipients of any federal funding to the City, such as CDBG, in the development of their own Four Factor Analyses and LAP's
  5. To fully support the efforts of the Language Access Coordinator

## **VII. Administration of the Language Access Plan**

- A. In order to insure the continued effectiveness of the Language Access Plan, the document and its contents shall be monitored and evaluated. This will be the responsibility of the Language Access Coordinator, assisted by the departmental Language Access Captains.
1. Questions, concerns or complaints regarding the provision of language assistance shall be brought to the attention of the Language Access Coordinator.
    - a. Complaints should be submitted in writing to the Language Access Coordinator and should include the name, address and phone number of the person bringing the complaint (or their authorized representative); a description of the incident or action, the place and date of its occurrence, the name of person or persons who witnessed or were adversely affected, and the name of any employee or representative of the City of Norwalk involved.
      - i. Assistance in filing complaints will be provided upon request by the Language Access Coordinator.
      - ii. The complaint should be submitted to the Language Access Coordinator as soon as possible within 30 calendar days of the incident or action.
    - b. Within 15 calendar days of receipt of the complaint, the Language Access Coordinator will meet with the complainant to clarify the facts of the incident and discuss possible resolutions.
    - c. Within 15 calendar days after the meeting, the Language Access Coordinator will respond in writing to the complainant explaining the position of the City of Norwalk and present options for substantive resolution of the complaint.
    - d. If the Language Access Coordinator's response does not satisfactorily resolve the issue, the complainant may appeal the Coordinator's decision within 15 calendar days of its receipt to the Corporation Counsel.
    - e. Within 15 calendar days of receipt of the appeal, the Corporation Counsel, or his/her designee, will meet with the complainant to further clarify the complaint and discuss possible resolutions.
    - f. Within 15 calendar days of the meeting, a response will be presented in writing to the complainant explaining the final resolution of the complaint.

- g. All complaints received by the Language Access Coordinator, appeals to the Corporation Counsel and responses/resolutions shall be kept on file for at least three years.
2. The use of language assistance resources shall be assessed annually by:
    - a. The completion of a data collection form by each department's Language Access Captain and submitted to the Language Access Coordinator detailing:
      - i. Feedback on LEP interactions (name, language, date, type of service provided, provider of services and perceived customer satisfaction)
      - ii. Documents translated by the department (name, language, date, reason for translating, type of document, nature of document, type of translation and provider of services)
      - iii. Bilingual Employee listing (name, language, phone number, approved abilities)
      - iv. Record of Complaints (number received)
    - b. Informal feedback from LEP persons and Language Access Captains on ways in which the LAP can be improved, specifically in the provision of services and notification of rights
  3. An annual review of the City's LAP by the Language Access Coordinator shall include:
    - a. A review of procedures
    - b. Adjustments made to the plan based upon the changing needs of Norwalk's LEP population
    - c. An evaluation of technology available to assist in the provision of language assistance
    - d. A review and update to the Language Resource Guide
    - e. An evaluation of goal completion and, if necessary, the establishment of new goals
  4. Compliance with the LAP shall be reviewed and reported to the Human Relations Commission by the Language Access Coordinator. This report shall include:
    - a. Compilation of the data submitted by each Language Access Captain
    - b. Feedback on ways in which the LAP can be improved, specifically in the provision of services and notification of rights
    - c. Attendance or proof of completion of training sessions for City employees
    - d. A summary of any complaints and/or grievances received by the Language Access Coordinator.
- B. The Language Resource Guide shall be a working document available to all City departments and employees and among other things, shall include:
1. The Role and Responsibilities of the Language Access Coordinator and Language Access Captains
  2. Procedural Flow Charts for Providing Language Assistance
    - a. Oral Language Services: In-Person
    - b. Oral Language Services: Over the Phone
    - c. Oral Language Services: Public Hearings/Meetings
    - d. Written Language Services: Translation of Written Materials
    - e. Filing a Complaint with the Language Access Coordinator
  3. Documents to be Used in the Notification of Services Available



- a. Sign: Regarding the right to language assistance, how it can be obtained and how to file a complaint, to be posted in common areas, offices and where applications are taken
  - b. Sign: “Do you need an interpreter?”
  - c. Taglines: “This document will be translated upon request. Please call... or visit our office for assistance.
  - d. Template mailing inserts informing recipients of available language assistance
  - e. Template instructions for requesting language assistance at a public meeting/hearing
4. Documents to be Used in Providing Language Assistance
- a. Language Identification Card
  - b. Phonetic Script to Identify the Language of LEP Phone Customers
  - c. Translated Card: “Please wait while appropriate language assistance is obtained.”
  - d. Phonetic Scripts: “Please wait while appropriate language assistance is obtained.”
  - e. Translated Form to Collect the Contact Information of an In-Person LEP Customer
  - f. Phonetic Script to Collect the Contact Information of an LEP Phone Customer
  - g. Translated Card: “How to file a complaint regarding language assistance services”
5. Listing, by language, of Approved Resources
- a. Bilingual city employees
  - b. Community organizations and volunteers
  - c. Professional language assistance providers
  - d. Technical Resources
  - e. Language Line information
6. Listing, by department, of all documents translated into another language
7. Copies of Training Information
8. Copies of Data Collection Forms
- C. The City of Norwalk’s Language Access Coordinator is:
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