

Language Access Plan

Final Report - February 6, 2018

City of Madison Common Council Executive Committee

Meaningful Access

- ▶ The City of Madison ensures meaningful access to City services shall not be denied or restricted to any individual because of limited proficiency in English or any disability which may limit the ability to communicate in English. To provide this access, the City shall provide *written translation and oral interpretation*, free of cost, to LEP persons to ensure *meaningful, accurate, and equal access* to programs, benefits, and activities.
- ▶ Madison's primary non-English language groups: *Spanish, Hmong, Chinese Mandarin, and American Sign Language (ASL)*



Why do we need Language Access?

- ▶ *Federal and local authority mandates* meaningful access to City programs, services, and information for persons with Limited English Proficiency or Disabilities
 - ▶ Title VI of the Civil Rights Act of 1964 and Executive Order 13166
 - ▶ The Americans with Disabilities Act
 - ▶ M.G.O. 39.02
- ▶ *Prevention* of future liability or loss of funding due to noncompliance
- ▶ *Accountability and Efficiency*: By clarifying service expectations and designating a LAP Coordinator, staff and language users may find resources they need
- ▶ *Good Governance*: Meeting the spirit of legal authorities rather than settling for minimum requirements improves the City services overall

Timeline of LAP Development

- ▶ Comprehensive LAP mandated by Resolution
 - ▶ September 2016
- ▶ Steering Committee began
 - ▶ March 2017
- ▶ Internal and external stakeholder feedback opportunities
 - ▶ May-November 2017
- ▶ Resolution granted extending deadline to submit comprehensive LAP
 - ▶ September 2017
- ▶ Comprehensive LAP submitted to Common Council
 - ▶ December 2017

Stakeholders Considered

▶ Professional Guidance

- ▶ *Steering Committee*: Department of Civil Rights combined with professional community partners to form a Steering Committee for better oversight of the Language Access Plan development.
- ▶ *Language Access Experts*: A public focus group solicited feedback from professional interpreters and translators who had reviewed the final plan.

▶ Community Stakeholders gave feedback at focus groups for language groups

- ▶ General audience with several Spanish-speaking community members; Chinese; Hmong; ASL, and; UW-Madison staff with Language Access Needs

▶ City Staff

- ▶ *All-Staff Survey*: Feedback from City staff who serve those with language barriers.
- ▶ *Leadership Review*: Meetings were held with feedback opportunities for Civil Rights Coordinators, Department and Division Heads, and Public Information Coordinators

What Does the LAP Say?



Standards: Who May Provide Interpretation or Translation Services?

- ▶ All interpretation and translation services must be made through approved vendors who meet the City's obligations under federal and local authorities.
 - ▶ Individuals or vendors who provide interpretation and translation services must be competent and culturally sensitive
 - ▶ Individuals or vendors who provide interpretation and translation services must meet certain certification standards
 - ▶ Those certified to interpret may not be certified to translate, and vice versa
- ▶ City staff should not provide translation or interpretation services except employees hired by the City to provide such services in-house.
 - ▶ Limited exceptions for Bilingual Staff are identified
- ▶ City staff are prohibited from relying upon volunteers, friends or family members whose competence has not been assessed for translation or interpretation.

Standards: What Must Be Interpreted or Translated?

- ▶ Primary language interpreters for key public meetings, press conferences or city conferences.
- ▶ Key press releases and citywide announcements
- ▶ All “**Vital documents**” - information or documents critical for accessing services or benefits required by law, or documents required by law.
 - ▶ May include info on City Websites
- ▶ Official Notices
- ▶ Way-finding Signage



Procedures: How and When to Request Translation or Interpretation Services

- ▶ Interpretation:
 - ▶ Different procedures for American Sign Language (ASL) and languages other than English (ESL)
 - ▶ Protocols for in person, on the phone, or at a meeting/event, including Video Remote Interpreting
- ▶ Translation
 - ▶ Document translation into a language other than English
 - ▶ Computer-Aided Realtime Translation (CART)
 - ▶ City public websites
- ▶ Reserving Equipment
 - ▶ Assistive Listening Devices
 - ▶ Polycom Devices

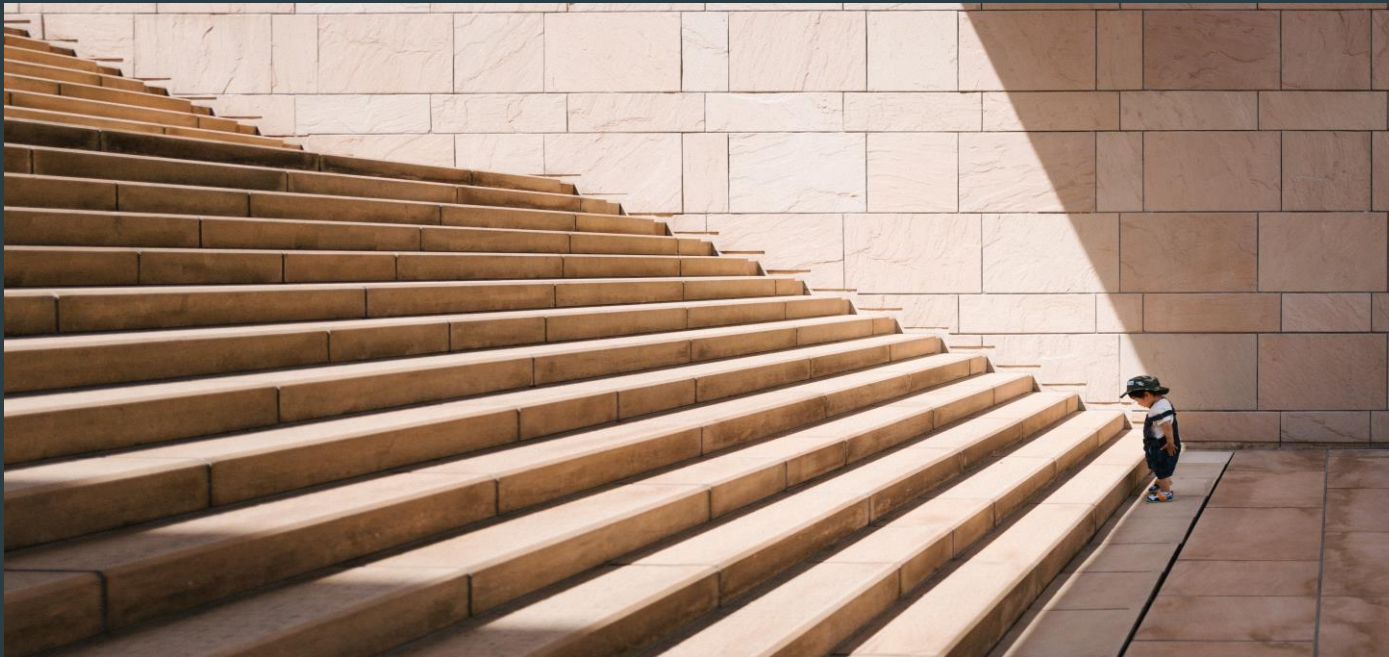
Responsibilities

- ▶ Staff Training
- ▶ Monitoring and Updating Language Access Plan
- ▶ Departmental Responsibilities
- ▶ Accountability



Phases of Service Implementation

- ▶ *Phase 1* - Communicating Existing Services
- ▶ *Phase 2* - Meeting Essential Language Access Needs
- ▶ *Phase 3* - Language Access Organization
- ▶ *Phase 4* - Complete Service Delivery and Accountability



Phase 1 - Communicating Existing Services

► *Priorities Include:*

- Training staff to use existing services efficiently
- Adopting an APM
- Hire temporary staff to identify data sets necessary to track language services to better anticipate future need
- Agencies identify vital documents for translation and informational videos to produce with interpretation
- Communicate City services to the public
- Develop procedures for disseminating urgent and time-sensitive vital information

Phase 2 - Meeting Essential Language Access Needs

► *Priorities Include:*

- Develop standards for using language services and tracking use
- Create a “Language Access Coordinator” position
- Create informational videos with appropriate translation and Interpretation
- Develop strategies for disseminating information via City websites
- Explore differential pay and a testing process for bilingual staff positions

Phase 3 - Language Access Organization

► *Priorities Include:*

- Potential staffing changes:
 - Supervisory staff to oversee language access
 - Internal translators and interpreters
- Establish organizational changes to manage language access
 - Transition from outside vendors to internal staff
 - Staff training and education

Phase 4 - Complete Service Delivery and Accountability

► *Priorities Include:*

- Finalize staffing changes by hiring internal translators and interpreters, support staff
- Establish internal standards and quality assurance measures
- Develop complaint and violation remediation procedures

Financial Outlook

- ▶ For the 2018 fiscal year, the Department of Civil Rights has a total Language Access budget of \$122,000.
- ▶ Includes:
 - ▶ Cost to translate vital documents into Hmong, Chinese Mandarin, and Spanish.
 - ▶ Agencies will need to identify priority vital documents
 - ▶ Cost of having American Sign Language, Hmong, Chinese Mandarin, and Spanish interpreters available for press conferences, and public meetings.
 - ▶ Budget covers ~450 hours of interpretation
 - ▶ Video translations
 - ▶ Two videos will be recorded per hour, for a total of fifty-four videos (2 per department).

Send us your feedback!

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