

**City of Madison, Wisconsin**  
**LANGUAGE ACCESS PLAN**

**Interim Report**  
**September 13, 2017**

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# City of Madison, Wisconsin LANGUAGE ACCESS PLAN

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# Introduction

## Policy Statement

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. The City is committed to provide equal opportunities in all programs, services, and activities to persons with Limited-English proficiency (LEP). This commitment stems from overall City goal of achieving and maintaining a respectful and welcoming city for all members of the community.

To provide this access, the City shall provide written translation and oral interpretation, free of cost, to individuals with Limited-English proficient persons to ensure meaningful, accurate, and equal access to programs, benefits, and activities. We monitor the changing demographics and population trends on an annual basis to ensure awareness of the changing demographics and language needs in our service area. We discourage the use of family members or friends as an interpreter because this may violate the persons' privacy and disclose sensitive and confidential information. It is our policy to inform all customers with Limited-English proficiency of the right to free language assistance and interpreter services at no cost to the LEP customer.

This Language Access Plan shall serve to inform the City of Madison's staff, leaders, elected officials and sub-contracted vendors regarding policies, procedures and practices to provide meaningful access to City services for those people with Limited-English proficiency.

## Authority

As a recipient of federal funds, the City of Madison is subject to Title VI of the Civil Rights Act of 1964 (which prohibits discrimination based on national origin) and Executive Order 13166, which mandates meaningful access to City programs, services, and information for persons with Limited-English Proficiency. Meaningful access means that an individual with Limited-English proficiency is given adequate information, can understand the services and benefits available, can receive the services for which the individual is eligible, and can communicate the relevant circumstances of his or her situation to the service provider.

In addition, the City's Affirmative Action Ordinance, Madison General Ordinance 39.02 holds that the official policy of the City of Madison is to provide equal employment and promotional opportunities and equal access to public services for all persons from all segments of the Madison community without regard to their disability, national origin, or other protective categories, and prohibits the practice of unfair discrimination in access to public services, employment and contracting for these reasons. The City is thus required to take "affirmative and direct action ... to make equal employment, access to public service, and promotional opportunities a reality and correct the effects of past patterns of inequality."

Further, in September of 2016, the City's Common Council adopted a resolution which prohibited the use of machine translation for official City of Madison communications, including the City website. The resolution also directed the Department of Civil Rights to develop a comprehensive language access plan to be submitted to the Common Council by June 2017. A new resolution was introduced to the Common Council on June 20, 2017 to extend the deadline by which this plan should be submitted. The extension directs the Department of Civil Rights to present an update on the Language Access Plan to Common Council in September 2017, with the final report due in December 2017.

## Need for Language Services

Madison's primary non-English language groups (Spanish, Hmong, and Chinese Mandarin) were identified using data from the past four years of language assistance provided by the City of Madison. This information was gathered from review of the following: documents translated, interpreters requested and languages utilized via telephone interpreter services. The breakdown of the City's population is detailed in the chart below. See also Top 15 Non-English Languages by State [\[Appendix A\]](#).

Subject	Madison city, Wisconsin											
	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	229,416	+/- 596	(X)	(X)	215,626	+/- 1,271	94.0%	+/-0.5	13,790	+/- 1,104	6.0%	+/-0.5
Speak only English	193,231	+/- 1,585	84.2%	+/-0.6	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	36,185	+/- 1,413	15.8%	+/-0.6	22,395	+/- 1,185	61.9%	+/-2.5	13,790	+/- 1,104	38.1%	+/-2.5
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	13,634	+/- 1,093	5.9%	+/-0.5	7,961	+/- 688	58.4%	+/-4.0	5,673	+/- 821	41.6%	+/-4.0
5 to 17 years old	3,758	+/- 517	1.6%	+/-0.2	2,777	+/- 453	73.9%	+/-6.7	981	+/- 286	26.1%	+/-6.7
18 to 64 years old	9,581	+/- 787	4.2%	+/-0.3	5,068	+/- 497	52.9%	+/-4.9	4,513	+/- 702	47.1%	+/-4.9
65 years old and over	295	+/-97	0.1%	+/-0.1	116	+/-70	39.3%	+/- 15.3	179	+/-57	60.7%	+/- 15.3
Other Indo-European languages	7,505	+/- 793	3.3%	+/-0.3	5,798	+/- 708	77.3%	+/-4.5	1,707	+/- 378	22.7%	+/-4.5
5 to 17 years old	756	+/- 193	0.3%	+/-0.1	592	+/- 184	78.3%	+/-9.5	164	+/-75	21.7%	+/-9.5
18 to 64 years old	6,127	+/- 685	2.7%	+/-0.3	4,781	+/- 641	78.0%	+/-5.0	1,346	+/- 324	22.0%	+/-5.0
65 years old and over	622	+/- 184	0.3%	+/-0.1	425	+/- 131	68.3%	+/- 12.0	197	+/- 106	31.7%	+/- 12.0
Asian and Pacific Island languages	13,704	+/- 787	6.0%	+/-0.3	7,770	+/- 752	56.7%	+/-4.3	5,934	+/- 667	43.3%	+/-4.3

5 to 17 years old	2,178	+/- 298	0.9%	+/-0.1	1,340	+/- 244	61.5%	+/- 10.5	838	+/- 283	38.5%	+/- 10.5
18 to 64 years old	10,986	+/- 681	4.8%	+/-0.3	6,226	+/- 702	56.7%	+/-4.7	4,760	+/- 542	43.3%	+/-4.7
65 years old and over	540	+/- 122	0.2%	+/-0.1	204	+/-88	37.8%	+/- 14.6	336	+/- 113	62.2%	+/- 14.6
Other languages	1,342	+/- 350	0.6%	+/-0.2	866	+/- 263	64.5%	+/- 10.5	476	+/- 190	35.5%	+/- 10.5
5 to 17 years old	145	+/- 113	0.1%	+/-0.1	86	+/-86	59.3%	+/- 24.0	59	+/-49	40.7%	+/- 24.0
18 to 64 years old	1,017	+/- 281	0.4%	+/-0.1	669	+/- 246	65.8%	+/- 12.1	348	+/- 135	34.2%	+/- 12.1
65 years old and over	180	+/-94	0.1%	+/-0.1	111	+/-62	61.7%	+/- 30.4	69	+/-74	38.3%	+/- 30.4
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	184,557	+/- 1,195	(X)	(X)	180,550	+/- 1,303	97.8%	+/-0.3	4,007	+/- 583	2.2%	+/-0.3
Speak only English	169,334	+/- 1,398	91.8%	+/-0.6	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	15,223	+/- 1,037	8.2%	+/-0.6	11,216	+/- 884	73.7%	+/-3.3	4,007	+/- 583	26.3%	+/-3.3
Spanish	5,516	+/- 680	3.0%	+/-0.4	4,060	+/- 522	73.6%	+/-5.9	1,456	+/- 407	26.4%	+/-5.9
Other languages	9,707	+/- 782	5.3%	+/-0.4	7,156	+/- 684	73.7%	+/-3.9	2,551	+/- 430	26.3%	+/-3.9

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Primary non-English language groups may change as new data is collected. The City's Language Access Plan will be updated no less frequently than the citywide Title VI compliance plan by the Department of Civil Rights. For additional details on updating and monitoring the City's LEP Plan, refer to the section **"Responsibilities."**

In addition, the City took the following steps to determine language needs and develop this Language Access Plan. These steps are outlined below in the section **Development of the Language Access Plan**. Further data sets will be identified and collected in order to ensure equitable access to language services for those who need them.

The need for comprehensive language access is evident from real-world examples. These instances represent a sampling of language access need and successful delivery:

- An interpreter will be scheduled to attend the Alcohol License Review Committee when an individual with Limited-English proficiency applies for an alcohol license and must go before the Alcohol License Review Committee.
- A deaf defendant in municipal court did not use American Sign Language to communicate. The Court supplied the defendant with both an in person ASL interpreter, and a Certified Deaf

Interpreter over Video Relay to interpret into South East Asian Sign Language to facilitate meaningful communication.

- The Child Care Unit of the Community Development Division translated their Child Care Accreditation applications allowing Latino Child Care Providers to more easily apply for and maintain Accreditation with the State creating opportunities for culturally competent childcare services.
- A Homeless family, who speaks Fulani, working with a local housing agency was able to obtain permanent housing after being connected with the Language Line through the Library. Providing the community with resources has been a long held fundamental part of Library Services, and the language line was able to assist them in providing quality services.

## Scope

The provisions of this Language Access Plan shall apply to every department in the City of Madison except where indicated. Public Health Madison and Dane County is not subject to this Language Access Plan.

The services provided in this Language Access Plan shall be available to any City employee, vendor, visitor, client, or Madison resident where services are necessary to obtain meaningful access to City services.

Some examples of appropriate uses of language services described in this document include:

- An individual with Limited-English proficiency comes to a Madison Public Library location seeking information about how to find jobs in Dane County. An information clerk or librarian may use telephonic interpretation to help direct the patron to job seeker resources available through Madison Public Library.
- A resident with a hearing disability would like to attend a Planning Commission meeting open to the general public. An ASL interpreter shall be present at the meeting.
- An individual with Limited-English proficiency receives a parking ticket. The ticket shall contain information in Primary Languages regarding how to pay or contest the ticket, and a translation into other languages shall be made available upon request.
- City agencies will make vital information on their websites available in Primary Languages via written translations or video with dialogue interpreted.
- A vendor contracted to provide services to individual residents on behalf of the City may use telephonic interpretation to provide these services.
- An individual with Limited-English proficiency who applies to a City of Madison job will be provided with translated application materials and/or an interpreter for an interview upon request.

## Development of the Language Access Plan

Resolution No. 34666 was passed by the City of Madison's Common Council in 2016. This resolution tasked the Department of Civil Rights with the development of a comprehensive language access plan. The Department of Civil Rights, along with a group of community partners, worked towards the realization of this plan. In the course of this process, it became apparent that more information was needed regarding the structure of language services, community usage, staff needs, financial data, and more.

To that end, the City took the following steps to determine language needs and develop this Language Access Plan:

- The Department of Civil Rights combined with community partners to form a Steering Committee for better oversight of the Language Access Plan development. This Steering Committee was comprised of the following individuals: Department of Civil Rights Director, Division of Affirmative Action Manager, Disability Rights and Services Specialist, Affirmative Action Specialist, two additional Department of Civil Rights staff (one of which is bilingual), one bilingual staff person from Building Inspection Division, one staff person from Community Development Division, one staff person from Information Technology, an Alderperson who is also a language access expert, and one community language access planning expert.
- Several Focus Groups were held to solicit feedback from community stakeholders regarding their knowledge of City services and language access needs.
  - On Tuesday, May 9, 2017 a Public Meeting was held. Several members of the Spanish-speaking community, and a few members of the Deaf community participated.
  - On Tuesday, July 11, 2017, a Chinese-language focus group occurred
  - On Thursday, July 20, 2017, feedback was provided by Civil Rights Coordinators
  - On September 5, 2017, City Department and Division Heads were briefed regarding the Language Access Plan. The same were given an opportunity to give feedback on September 11, 2017.
  - On [date], a Hmong-language focus group occurred
  - On [date], an ASL-language focus group occurred
  - On [date], a focus group solicited feedback from UW-Madison staff regarding Language Access procedural aspects.
  - On [date], a final "expert panel" reviewed the Language Access Plan for final feedback
- All employees of the City were given the opportunity to respond to a survey. The purpose of this survey was to collect feedback from City employees with regard to providing services when language barriers may arise. There were questions for all employees, with some specialized questions to be answered by bilingual employees, and some for emergency responders. [Full survey results as [Appendix B](#)]
- Additional process steps are outlined in the Language Access Plan timeline, attached as [Appendix C](#).

For more detailed information regarding ongoing implementation measures, see the section ***Phases of Language Service Implementation***.



## Definitions

- **American Sign Language (ASL)** – A language used predominantly by individuals who are Deaf or hard of hearing, which uses syntax that is distinct from spoken English. Those who communicate in ASL as their primary language may or may not be able to speak, write, or lip-read in English.
- **Computer-Aided Realtime Translation (CART)** – A method to provide access to spoken communication for people who are deaf or hard of hearing. Is also referred to as “real-time captioning” or “Communication Access Realtime Translation”. It is defined as the instant translation of spoken English to English text using a computer or realtime software. The text can be displayed on many mediums, including: an individual’s computer, projected onto a screen, combined with a video, or other display systems.
- **English as a Second Language (ESL)** – A term used to describe the use, study, and teaching of the English language by non-native English speakers in an English-speaking environment.
- **Interpretation** - Interpretation is the conversion of a spoken message from one language to another while preserving the intent and meaning of the original message.
- **Limited English Proficient (LEP) Individual** - A person who does not speak English as their primary language and who has a limited ability to speak, read, write or understand English. These individuals may be entitled to language assistance with respect to a particular type of service, benefit or encounter.
- **Meaningful Access** – Access such that an LEP individual is given adequate information, can understand the services and benefits available, can receive the services for which the individual is eligible, and can communicate the relevant circumstances of the individual’s situation to the service provider.
- **Primary Languages** – The set of languages which includes English, American Sign Language (ASL), and the top three primary non-English language groups most commonly used in Madison.
- **Qualified Bilingual Staff** – An employee who provides services in two languages and has had their language skills properly assessed and vetted. As part of the hiring process, this employee has been tested for their fluency in both languages and has a position description that identifies providing services in multiple languages as part of their work duties and responsibilities.
- **Translation** - Translation is the conversion of a written message from one language to another while preserving the intent and meaning of the original message.
- **Video Remote Interpretation (VRI)** – A means of interpretation which incorporates a computer or two-way video screen. It can be used to provide an individual with simultaneous signing or spoken interpretation of a conversation or meeting.
- **Vital Documents** – Information or documents that are critical for accessing federally funded services or benefits, or are documents that are required by law. See the section “*What must be interpreted or translated?*” for more information.

# Standards for Service Delivery

## Who may provide interpretation and translation?

All interpretation and translation services must be made through approved vendors who meet the City's obligations under federal and local authorities. In addition, standards for interpretation may be different than standards for translation. To ensure compliance, all requests for interpretation or translation services must be made through the Department of Civil Rights.

The City shall establish staff who shall be responsible for coordinating interpretation and translation services and monitoring competency standards. Currently the City has no staff whose position description includes managing or coordinating language services. Without a designated staff contact, the City may not be providing necessary language access services due to staffing shortage and lack of procedural guidance. The onboarding of these staff are described in the section *Phases of Language Service Implementation*.

### Interpreter competency

The City will use competent and culturally sensitive interpreters, appropriate to the level of interpretation required by law. Interpretation is more than the ability to speak two or more languages. Interpretation is the conversion of a spoken message from one language to another, while preserving the intent and meaning of the original message. Interpreters must be skilled and competent. Competent interpreters should be able to demonstrate at least one of the following:

- High level of fluency in both languages
- evidence of training that includes skills and ethics of interpreting;
- ability to convey information in both languages, accurately and completely, as demonstrated by a simulated interpreting encounter; or
- fundamental knowledge in both languages of any specialized terms or concepts related to a City department's service, program or activity.

Interpretation services for the City will be carried out by competent interpreters, whether they are City employees, contractors or telephone interpreters. City employees who work as interpreters must demonstrate competence as defined above. With contract interpreters and telephone interpreters, contracting agencies must demonstrate how competency is assessed.

### Translator competency

Translation is more than the ability to read and write in two or more languages. Translation is the conversion of a written message from one language to another, while preserving the intent and meaning of the original message. Translators must be skilled and competent. An individual who is a competent interpreter may or may not be competent to translate. A translator should understand the expected reading level of the audience and where appropriate, have fundamental knowledge about the target group's vocabulary and phraseology. A competent translator should demonstrate one or more of the following:

- High level of fluency in both languages
- 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 request
- Fundamental knowledge in both languages of any specialized terms or concepts
- With approved contract translators, contracting agencies should demonstrate how competency is assessed.

The City may contract with third-party translation services or employ staff to provide translation proofreading services to ensure accuracy and cultural sensitivity.

### **Certified providers**

Individuals or vendors who provide interpretation and translation services must meet certain certification standards which meet the City's obligations under federal and local authorities. In addition, certain types of interpretation (e.g. legal interpretation, medical interpretation, ASL interpretation) are regulated by federal and local laws and certification procedures. In order to ensure the City's interpreters and translators comply with these obligations, and because the City is unable to provide internal oversight of compliance standards, all interpretation and translation services must be made through approved vendors or in-house service providers. Requests for such services must be made through the Department of Civil Rights. Certification standards will be developed and published as specified in implementation phases.

Because some City departments are subject to information privacy laws, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), any individuals or vendors who provide interpretation and translation services must be able to demonstrate and maintain HIPAA compliance. HIPAA requires vendors to have a business associate agreement on file. Approved certified vendors must have a service agreement with the City that includes a business associate agreement.

### **Appropriate use of staff**

City staff should not provide translation or interpretation services except employees hired by the City to provide such services in-house. The practice of City staff providing full or partial document translation is not appropriate because it compromises the City's obligations to ensure compliance with federal and local authorities, costs the City more in staff time, and unduly burdens staff who are actually or perceived to be bilingual.

City employees hired as bilingual employees should be treated with the expectation that their bilingual requirement is specific to their work area, not for general interpretation or translating documents on the City's behalf. However, bilingual staff may review translated materials within their area of work expertise for accuracy and other feedback. Bilingual staff may also provide interpretation services in limited circumstances: where the conversation pertains to general inquiries and information on services, employees may interpret conversations within their department or area of expertise. Where the topic of interpretation is more in-depth or may pertain to legal issues or an individual's rights or meaningful access to services, staff should not interpret. Bilingual staff shall never be used to help in negotiations, hearings, translate legal or technical forms and documents unless they are certified to do so.

The City shall explore and implement differential compensation rates for employees whose position title includes the term "bilingual," or whose job duties include performance of work in a bilingual fashion. This is considered to be a best practice and has been locally implemented by both Dane County and UW Health. City staff shall work on creating a database of qualified bilingual staff to be posted on the City of Madison Employeeenet.

## Non-city-staff volunteers

City staff are prohibited from relying upon volunteers, friends or family members whose competence has not been assessed for translation or interpretation. The use of untrained volunteers exposes the City to liability related to its legal obligation to provide competent translation services. Similarly, for reasons of accuracy, confidentiality and family dynamics, minor children (under 18) may not interpret or translate vital documents for family members or other individuals with Limited-English proficiency. This guideline does not apply in emergency cases, when a minor child is the only available potential interpreter or translator.

## What must be interpreted or translated?

The City must provide an interpreter and translations, free of charge, to individuals with Limited-English proficiency if needed to receive meaningful access to City services, programs and activities.

To ensure meaningful access for individuals with Limited-English proficiency, the City shall provide primary language interpreters at all meetings of the Common Council, as well as any press conferences or city conferences. In addition, interpreters in other languages may be provided upon request providing sufficient advance notice. Interpreters will also be available upon request made in advance for committee meetings, interviews, and other exchanges which are critical for accessing services or benefits required by law.

Similarly, the City shall make it its practice to translate all key press releases and citywide announcements into primary languages to ensure meaningful access for individuals with Limited-English proficiency. Vital documents must also be available in the City's primary languages or readily translated, upon request.

"Vital documents" refer to information or documents that are critical for accessing services or benefits required by law, or are documents that are required by law. Subject matter written on City public websites may constitute vital documents. Documents that require a signature are considered vital. Examples include:

- 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, child support, or resulting from other hearings
- Notices advising LEP individuals 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
- Applications to participate in a recipient's program or activity
- Applications to receive benefits or services
- Short descriptions of department or services

Non-vital written materials could include the following:

- 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 excerpted vital information contained in large documents may need to be translated)

Not all documents can be translated and available in every language. City departments must have the capacity to obtain translation of vital documents upon request and in a timely fashion. Materials translated

must be evaluated for accuracy of translation. Non-vital documents may be translated as determined by the Department of Civil Rights on a case-by-case basis. The financial responsibility for translation of non-vital documents shall belong to the department requesting the translation.

## **Official Notices**

The City of Madison is subject to the Open Meeting Law (Found in sections 19.81 through 19.98 of the Wisconsin Statutes, reproduced in section 3.71 Madison General Ordinances, and supplemented by Administrative Procedure Memorandum 3-13). This law requires that any meetings of state or City governmental bodies (including boards, commissions, committees, councils, etc., and all designated subunits of these) must be held in a publicly accessible location and be preceded by notice. In some circumstances, the City may use Video Remote Interpretation if technologically practical for the given meeting or event.

Notices must include language stating that interpreters will be provided upon request, if requested at least 48 hours prior to the meeting. In addition, the following language translated into primary languages shall appear at the top of all such notices: *"If you need an interpreter, translator, materials in alternate formats or other accommodations to access this service, activity or program, please call the phone number below immediately."*

## **Way-finding Signage**

The City owns and/or operates out of several facilities which are open to residents and visitors. These facilities have various signage posted which provides direction to sites of physical access, such as office numbers or public restroom sites, as well as signage out of the facilities. This "way-finding signage" may be necessary for meaningful access and reasonable safety. For example, in order for a resident to contest a ticket or pay a property tax bill, it may be necessary for them to follow signage directing the individual to the physical location of the Municipal Court or the Office of the Treasurer.

In all facilities where the City operates, all way-finding signage must be translated into primary languages. This translation shall be required in all areas where individuals who are not City personnel may be welcome, such as public hallways and waiting areas, restrooms, and interior offices or spaces where these individuals may regularly be admitted. Way-finding signage which must be translated includes building directories and emergency exits.

# Interpretation Procedures

## ESL Interpretation

### At the front desk

To respond to LEP individuals at the front desk, first ensure that the Language Chart is posted at the front lobby area ahead of time. Whenever possible, use visual cues to assist in communication (Language Chart can be printed from <http://www.cityofmadison.com/dcr/documents/LanguageChartPopulation.pdf>).

Staff should take the following steps to respond to LEP individuals at the front desk:

1. If staff is unable to communicate in English with a visitor, point to the Language Chart and ask: "What language do you speak?"
2. Once they have indicated what language they speak, say "One moment please" in their language.\*
3. If appropriate, check if there is another staff person who speaks the indicated language in your Department and ask for assistance.
4. In the event you cannot reach anyone, or no one speaks the appropriate language, connect with the City's Interpretation vendor.\*

For any questions, please contact the Department of Civil Rights. For additional guidance, review the document, "Tips on Serving the Multi-Lingual External Client."\*

\*Instructions and translations can be found on the "Resources" page of the Department of Civil Rights employee intranet.

### On the phone

Staff should take the following steps to respond to individuals with Limited-English proficiency when receiving incoming phone calls:

1. Ask if the caller speaks any English. Try to determine the client's primary language. If possible, say "Please Hold" in that language\* and check if there is a qualified bilingual staff person available in your department who speaks the indicated language.
2. If no one is available, or no one speaks the appropriate language, take the call off of hold and press the "conference button."
3. In the event you cannot reach anyone, or no one speaks the appropriate language, connect with the City's Interpretation vendor.\*

Staff should take the following steps to respond to individuals with Limited-English proficiency when making an outgoing phone call:

1. Call the language line vendor and provide them with the City of Madison's password, the requested language, and phone number of the individual.
2. The operator will connect you with both the interpreter and the individual.

For any questions, please contact the Department of Civil Rights. For additional guidance, review the document, "Tips on Serving the Multi-Lingual External Client."\*

\*Instructions and translations can be found on the "Resources" page of the Department of Civil Rights employee intranet.



## At a meeting or event

Individuals who need a language interpreter for a City event or meeting may do so by contacting the Department of Civil Rights. Request must be made no later than two weeks in advance and include the following information:

- Date and time of event/meeting
- Language needed
- Expected number of people
- Exact address where event/meeting will take place
- Contact name and cell phone number
- A small description of meeting, including the type of communication (conversational or one-way communication) and any documents/flyers/handouts distributed in advance
- Expected length of the meeting or event

## ASL Interpretation

### In person

Individuals who cannot speak or hear will usually indicate how they wish to communicate (e.g. motioning their hand writing, etc.). If the individual's only way of communication is ASL, where advanced contact has been made, the department should acquire an interpreter by contacting the Department of Civil Rights. Alternatively, City staff should follow procedures for using Video Remote Interpreting (VRI) services.

For any questions, please contact the Department of Civil Rights. For additional guidance, review the document, "Communicating with Deaf People at the Front Desk." This document can be found on the "Resources" page of the Department of Civil Rights employee intranet.

### At a meeting or event

Individuals who need an ASL interpreter for a City event or meeting may do so by contacting the Department of Civil Rights. Request must be made no later than two weeks in advance and include the following information:

- Type of Interpreter needed (On-Site/Remote/specialized)
- Date, Time and length of event/meeting
- Expected number of people (If need is individual, provide the name of deaf individual)
- Exact address where event/meeting will take place
- Contact name and cell phone number
- A small description of meeting, including the type of communication (conversational or one-way communication) and any documents/flyers/handouts distributed in advance

### Video Remote Interpretation (VRI)

Video Remote Interpreting (VRI) should be used when working with an individual who uses American Sign Language to communicate. It can be used to provide the person with simultaneous signing of a conversation or meeting. To connect with the City's VRI vendor, follow the instructions available at <http://www.cityofmadison.com/dcr/documents/videoRemoteInstr.pdf>

Generally, VRI works if there is access to the City's computer network (with adequate bandwidth) and without firewalls to prevent access. Most agencies in the City-County and Municipal Buildings can use VRI without a problem. Check with Information Technology to determine if bandwidth is adequate and that firewalls will not be a problem.

The City has a number of sets of Polycom equipment. The following departments have their own Polycom equipment: Emergency Operations Center/Water Utility, Fire, Health, Monona Terrace and Police. Each of these agencies should have their own contacts for reserving their equipment. For other locations, see information below on reserving the equipment.

A VRI session should be scheduled as soon as possible with advanced notice of a meeting, but no less than 24 hours. We recommend trying out the equipment prior to the scheduled meeting so that any connection problems can be worked out well ahead of time.

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# Translation Procedures

## Document translation into a language other than English

To request that a document be translated into a language other than English, send the source document (not in PDF form) to the Department of Civil Rights. Include the following information:

- Language needed
- Date document is needed
- A small description of what the document is for

Documents may also be translated into Braille or another Alternate Format (large print, Braille, electronic format for screen readers). To request a document formatted into one of these, please contact Document Services.

## Computer-Aided Realtime Translation (CART)

Communication Access Real-time Translation (CART) is the process of translating spoken word into written text for persons who may be deaf, hard of hearing, learners of English as a second language, etc. This process is also known as realtime captioning (RTC) or simply, captioning.

Captioning requires a skilled stenographer (typically a court reporter), stenotype machine, notebook computer and real-time software. Captions may be displayed on a small screen read only by a few people, displayed on a large screen for groups (i.e., conference settings), or broadcast on the Internet or via satellite. Captions appear almost instantaneously so there is very little lag time between the spoken message and the message being displayed.

CART services may be used as one option to facilitate language access for large meetings and presentations. It is best utilized when communicating to a large audience, and is recommended for use during conference keynotes, and general addresses. CART services may also be used over the internet through a contracted provider to facilitate communication on an individual basis, though this may not be the best form of meaningful access. To request CART services [\[Add instructions\]](#)

## Internet Access

Written materials on City public websites must be translated where subject matter constitutes Vital Documents necessary for meaningful access to information. Interactive material on City public websites, such as "Report a Problem" may not be available for translation in a timely fashion. Interactive materials must include a statement in the City's Primary Languages that these services are not available online, but provide relevant contact information by phone or in person.

Information Technology provides a website content management system to each agency with a multilingual feature. The multilingual feature provides the ability to associate English pages to multiple translated pages (examples: Spanish, French, Arabic, etc.) that are associated with the "parent page." When new translated pages are created, content editors will associate the translated pages to the parent English page. Once pages are published, the translated pages links will automatically be added to the parent English page and all other associated translated pages. Information Technology shall develop and implement a more detailed strategy to feasibly allow City websites to become compliant with the Language Access Plan

All translations will be completed by a human translator. The content management system multilingual feature will not automatically translate content. Each agency must provide updated translations for all pages in which the English page is updated.

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# Equipment Access

## Assistive Listening Devices

LEP individuals and individuals with hearing impairments may need translation or amplification devices. Assistive Listening Devices allow for sound amplification or translation to up to two languages at a public meeting.

Assistive Listening Devices must be available as standard procedure at all City meetings without visitors needing to request equipment in advance. When planning a meeting open to the public, the hosting agency must reserve Assistive Listening Devices at least one week prior to the meeting. Assistive Listening Device equipment must be reserved through the Department of Civil Rights. In addition, instructions for Language Translation or sound amplification devices are detailed at <http://www.cityofmadison.com/employeeenet/dcr/resources.cfm>

## Remote Interpreting

Remote Interpreting should be used when you are working with an individual who uses ASL to communicate. It can be used to provide them with simultaneous signing of a conversation or meeting. Remote Interpreting should be used when in-person ASL interpretation is not available.

Polycom Devices for remote interpreting must be reserved through the Department of Civil Rights. Requests should include:

- Location of meeting
- Length of time equipment will be needed
- Whether or not you need assistance with setup and connecting

Additional instructions for equipment setup can be found at <http://www.cityofmadison.com/dcr/documents/videoRemoteInstr.pdf>

# Phases of Language Service Implementation

In order to effectively deliver the services required in this Language Access Plan in a comprehensive manner, several phases have been established. The phases outlined below shall occur sequentially, however there may be some overlap in execution of these phases. Similarly, as the time required to complete each phase may vary, there will not be a hard deadline to complete each phase. All four phases should be completed within three to five years from the adoption date of this Language Access Plan.

The responsible party for implementing each phase component shall be the Department of Civil Rights except where otherwise specified.

## Phase 1: Communicating Existing Services

This phase is focused on familiarizing City staff with the current services offered by the Department of Civil Rights. Currently the department offers minimal interpretation and translation services on an as requested basis, this model only works if staff are aware that the service is available and know how to access it. Educating staff on current services will provide a starting point for the expansion of services in order to provide meaningful access. Several steps of this phase are currently underway, or will be undertaken before the completion of this plan with the intention of implementation shortly after publication.

- **Conduct outreach regarding existing language services so users are aware of what is available to them**

Currently, staff seeking access language services are directed to the city intranet to find directions on making requests. Staff surveys have indicated that [insert survey results] of staff are aware of language access services.

The Department of Civil Rights has developed a training for front-line staff regarding the access and use of current services. In coordination with Human Resources' Office of Employee Development and Organizational Effectiveness, the Department of Civil Rights will continue to provide access to this training and ensure that training efforts will be tracked. These agencies will also explore the possibility of providing this training for all new staff at orientation.

- **Purchase equipment necessary for interpretation sufficient to meet need for meetings and events where multiple individuals may require interpretation**

The City will purchase the equipment necessary to provide simultaneous interpretation in the top three languages indicated in American Community Survey data. Currently, the City can provide simultaneous interpretation in two languages to a very limited number of individuals, requiring the city to rent equipment in some instances.

- **With the assistance of the City Attorney, establish an Administrative Procedure Memorandum (APM) to require departmental compliance with the Language Access Plan**

The purpose of this APM is to establish procedures to ensure that LEP individuals receive meaningful access to City services in full compliance with all civil rights laws. It will address standards for responsibility, compliance, and training across all city departments. This step is

currently underway and will be completed prior to or concurrent with the adoption of this Language Access Plan.

- **Establish standards of quality and standard procedures, as well as a code of ethics for interpreters and translators**

This will be done in addition to the above referenced Administrative Procedure Memorandum and is intended to lay out the expectations for the quality of service, conduct of providers, and expectations of city staff and contractors. These two documents will be the guiding principles under which language service providers conduct themselves when working for the City.

- **Departments heads shall identify number and cost of videos and documents to be translated as vital documents and report to the Department of Civil Rights**

This Language Access Plan increases the level of minimum services to be provided. In recognition that transitioning to the requirements of this plan will require significant time and other resources, there is an expectation that translation of vital documents and interpretation of informational videos will occur on an incremental schedule.

In this Phase, all City departments will identify and prioritize its vital documents and videos. Those documents and videos which are most pertinent to the community will be scheduled for translation and interpretation as soon as possible, with less pertinent materials to follow.

- **Ensure all departments have Language Identification Chart displayed appropriately**

This step is currently underway and will be completed prior to the adoption of this Language Access Plan.

- **Identify data sets necessary to track language services to better anticipate future need**

Temporary staff will be hired to begin identification of needed data. These staff will take over the tasks of data collection related to language requests, as well as develop new data measures to ensure we are accurately capturing growth of this service. This new staff will be responsible for gathering departmental data related to several factors. These staff are temporary because it is anticipated that full-time staff will be necessary to execute steps identified in later Phases.

In addition, some aspects of information collection is underway concurrent with the development of this plan. Examples include a survey sent to all City staff to assess existing knowledge of language services and resource needs, and community focus groups which target specific language groups.

- **In coordination with Information Technology, develop strategy to allow City websites to become compliant with the Language Access Plan**

An implementation plan will be created to guide the process of developing language access web services as departmental resources allow.

- **Continue working with LAP steering committee**

This will be necessary for continued guidance and oversight.

- **Draft a report to outline progress of this Phase**

At the end of this and all Phases, a report shall be drafted and submitted to the City of Madison's Common Council. The report will provide a detailed explanation of progress made to the completion of each item in this Phase. Where appropriate, supportive data, plan details, and feedback received will be submitted within the report or as addenda. Any additional changes or clarification to subsequent phases shall also be included.

## **Phase 2: Meeting Essential Language Access Needs**

Once substantial progress has been made on the steps of Phase 1, staff will undertake tasks related to establishing the foundation for meaningful access. This phase is intended to build the internal structure needed to administer language access services above the current levels. In order to do so, the Department of Civil Rights will require the partnership with all City agencies, primarily Information Technology and Human Resources. In this phase there will be increased reliance on departments to identify their needs in providing language access services.

- **Develop standardization for language service usage data collection and reporting**

In conjunction with the city-wide data team, staff hired to collect data for Phase 1 will be responsible for the development of a standard data collection tool. This tool is intended to capture the number of hours interpretation and translation services are used, the trends in primary languages, and the allocation of assistive devices.

- **Issue an RFP/RFB for language service providers ahead of contract expiration**

Currently the City is utilizing the state contract for language services. This contract has been extended, but expires at the end of 2018. In 2018 staff will author and issue an RFP/RFB in order to secure continuing contractual services. This will be open to multiple awards to explore a variety of language service provisions.

- **Create a "Language Access Coordinator" position**

In order to expand these vital services, a full time coordinator will be required. This position will be developed based on the data gathered in this and the previous phase of this plan. Establishing this position will allow the department to dedicate the necessary staff time to coordination, data collection and follow up. This will also give departments access to a specific staff to assist them in their compliance with this plan. It is anticipated that the appropriate starting compensation level will be 18/02 for this position.

- **Departments shall cooperate with Information Technology and the Department of Civil Rights to create informational videos with appropriate translation and interpretation**

Access to written translation of web content may not be an effective means of communicating with all LEP individuals, some of whom may have verbal or visual fluency in their first language but may not have proficiency at reading. Feedback already received indicates that informational videos, when translated or interpreted, may be a superior mode of communication to LEP individuals while

adding efficiency and cost savings by avoiding unnecessary translation of documents or web content.

Departments will be expected to cooperate with Information Technology and the Department of Civil Rights to create such informational videos whose messages contain vital information. This effort will need to follow the website compliance implementation strategy.

- **In coordination with Information Technology, implement strategy to allow City websites to become compliant with the Language Access Plan**

In order to comply with the provisions of this Language Access Plan, a large amount of information will need to be translated. Much of this information is held in electronic format. As a result, staff whose responsibilities include electronic information management must also include translation and interpretation of such content. There may be significant training and technological support staff needed to ensure data managers are able to meet these obligations.

Information Technology is the department best situated to identify technological needs. As such, Information Technology will develop a detailed strategy to outline how the requirements of this Language Access Plan will be met, a schedule for specific projects, and resources needed.

- **Translate vital documents**

Translation of documents identified in Phase 1 will begin. This will occur on an incremental schedule based on priority. Those vital documents and informational videos which are most pertinent to the community will be scheduled for translation and interpretation as soon as possible, with less pertinent materials to follow.

- **In coordination with Human Resources, explore differential pay for bilingual staff, and explore a testing process for bilingual staff positions**

Dane county recently adopted this policy, offering a \$0.75 per hour premium on the pay of bilingual staff. The City is interested in exploring a similar structure to encourage individuals with bilingual skills to apply for city jobs. This will defray some of the burden on interpretation and translation services by ensuring that departments have the capacity to provide services in multiple languages.

- **Continue working with LAP steering committee**

This will be necessary for continued guidance and oversight.

- **Draft a report to outline progress of this Phase**

At the end of this and all Phases, a report shall be drafted and submitted to the City of Madison's Common Council. The report will provide a detailed explanation of progress made to the completion of each item in this Phase. Where appropriate, supportive data, plan details, and feedback received will be submitted within the report or as addenda. Any additional changes or clarification to subsequent phases shall also be included.

### Phase 3: Language Access Organization

This phase is focused on growing the language access services provided by the City. During this phase, the Department of Civil Rights will bring the provision of language access services entirely under the purview of the City. This model is consistent with many organizations of comparable size and within our region, such as the University of Wisconsin-Madison, and serves to provide in-house language services effectively across independent departments.

- **In coordination with Human Resources' Office of Employee Development and Organizational Effectiveness, establish organizational changes to manage access and inclusion initiatives**

Language barriers create access barriers for many individuals with limited-English proficiency including people from other countries and members of the Deaf community. The department will look at the entirety of access and inclusion efforts to determine the best structure under which to expand the language access program. The Department of Civil Rights already conducts several access and inclusion initiatives through the work of the Affirmative Action Specialist and the Disability Rights and Services Specialist.

- **Hire supervisory staff for employees whose job duties include language access coordination or administration**

In order to provide meaningful access, it is apparent that there needs to be significant structure behind this effort. This should be accomplished through the development of a division or department to focus either specifically on language access or more broadly on access and inclusion initiatives. This will provide the structure for administration of a comprehensive program. It also will improve the onboarding process and quality control for staff who shall conduct interpretation, translation, and in-depth training.

- **In coordination with Human Resources, explore potential creation of translator, interpreter, and/or trainer position(s)**

These positions would become responsible for conducting interpretation, translation and training in one of the primary languages, reducing reliance on third-party contracted services. This will allow services to be more readily available and reduce the lead time required to book adequate interpretation services.

- **In coordination with Human Resources, develop testing standards for bilingual staff**

This is necessary to identify the skills and knowledge necessary in potential hires for the above noted positions. It will be the responsibility of Human Resources to administer the test, with the Department of Civil Rights assisting in question and benchmark selection.

- **Provide outreach regarding change in service delivery from using outside vendors to internal employees**

The additional language staff (such as a language access coordinator) will cause a change in the service model which City staff have been trained and accustomed to. This will also change when the City hires internal translators, interpreters, and/or trainers for each primary language. It may be



necessary to re-train/re-educate staff regarding procedures for using translation and interpretation services.

- **In coordination with Human Resources' Office of Employee Development and Organizational Effectiveness, review and revise employee training/education structure**

As language service procedures change, the Department of Civil Rights will need to update the training for front-line staff regarding the access and use of services. In coordination with Human Resources' Office of Employee Development and Organizational Effectiveness, the Department of Civil Rights will provide access to this training and ensure that training efforts will be tracked.

- **Continue working with LAP steering committee**

This will be necessary for continued guidance and oversight.

- **Draft a report to outline progress of this Phase**

At the end of this and all Phases, a report shall be drafted and submitted to the City of Madison's Common Council. The report will provide a detailed explanation of progress made to the completion of each item in this Phase. Where appropriate, supportive data, plan details, and feedback received will be submitted within the report or as addenda. Any additional changes or clarification to subsequent phases shall also be included.

## **Phase 4: Complete Service Delivery and Accountability**

This phase identifies the departments' final efforts in developing a comprehensive language access program. By this point, the general structure will be in place and the intention is to fill in the necessary staff resources to provide meaningful access.

- **Hire internal translators, interpreters, and/or trainers for each primary language**

By this stage, the City will be prepared to take on the task of employing staff to translate, interpret, and provide training in each of the primary languages and monitoring their services with quality and competency control measures. These staff will be employed by the division within the Department of Civil Rights as established in Phase 3. It is anticipated that these staff would allow the City to reduce its reliance on outside service providers, whose costs may be higher and whose standards are more difficult to manage.

- **Establish internal standards for translation and interpretation**

Internal translators, interpreters, and/or trainers will be expected to demonstrate core competencies at periodic intervals. The Department of Civil Rights will establish measures to assess this competency to maintain quality of service provided.

- **Establish quality assurance measures (e.g. a third-party proofreader)**

The City may need to contract with third-party providers to provide safeguards against internal language service errors. This may include backup staff for languages or situations where in-house staff are unavailable, and proofreading of staff translations.

- **Hire additional administrative support staff as needed**

It may be necessary to hire support staff to assist with administrative functions secondary to this Language Access Plan. Functions may include scheduling/management of language requests, financial functions, and other support tasks. The need for these staff will be articulated by the Director of the Department of Civil Rights and classified with the assistance of Human Resources.

- **With the assistance of the City Attorney, develop complaint and violation remediation procedures**

There may be instances in which an LEP individual believes their right to meaningful access has been denied due to some failure of the City to provide services as described in this or subsequent Language Access Plan versions. In those instances, the individual shall have an opportunity to make a complaint.

The Department of Civil Rights, with the assistance of the City Attorney, shall establish procedures for investigating complaints, identify standards, and develop remediation options and practices.

- **Continue working with LAP steering committee**

This will be necessary for continued guidance and oversight.

- **Draft a report to outline progress of this Phase**

At the end of this and all Phases, a report shall be drafted and submitted to the City of Madison's Common Council. The report will provide a detailed explanation of progress made to the completion of each item in this Phase. Where appropriate, supportive data, plan details, and feedback received will be submitted within the report or as addenda. Any additional changes or clarification to subsequent phases shall also be included.

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# Responsibilities

## Staff Training

The Department of Civil Rights, in cooperation with all City Department and Division Heads, will be responsible for training City staff to follow the procedures articulated in this Language Access Plan.

To meet these training needs, the Department of Civil Rights will hold annual trainings open to general staff of the City, and develop an online or video training module for staff. In addition, information or training shall be provided to new employees at orientation.

The Affirmative Action Division of the Department of Civil Rights shall also be responsible to annually review the procedures articulated in this Language Access Plan with the Civil Rights Coordinators. Once annually, Civil Rights Coordinators will be responsible to remind the staff in their agency of the Language Access Plan, and be able to provide guidance on the procedures therein.

Human Resources' Office of Employee Development and Organizational Effectiveness shall maintain a training registry that records the names and dates of employee training conducted under this Plan.

## Monitoring and Updating Language Access Plan

The Department of Civil Rights shall identify and standardize data sets necessary to know when and how individuals are attempting to access language services (e.g. website, phone, etc.) in order to establish priorities. This responsibility may necessitate the creation of Language Access Coordinator position(s) or division.

The City's Language Access Plan will be updated no less frequently than the City of Madison's Title VI Civil Rights Compliance Plan by the Department of Civil Rights. Periodic evaluation of the Language Access Plan's effectiveness will include:

- Review of the LEP population in Madison and re-identification of the City's primary language groups
- Assessment of the current level of services delivered to LEP individuals by each City department
- Reporting on the LEP training received by City employees, which shall be tracked by Human Resources.
- Reporting of activities by each City department
- Feedback and comments from LEP communities, including organizations and advocacy groups serving LEP individuals, on the effectiveness of the City's LEP services
- Evaluation of complaints (both at the City departmental level and the City level)

Department of Civil Rights will monitor and work with City departments to ensure that they act in accordance with the guidelines provided in the City's Language Access Plan and per federal and state regulations. Each City department will be required to report information pertaining to this Language Access Plan to the Department of Civil Rights.

## Departmental Responsibilities

The Department/Division Head for each City agency will be responsible for understanding and implementing the requirements of this Language Access Plan in their respective departments. The Department of Civil Rights will closely monitor these efforts to ensure compliance with this Language Access Plan.

### Reporting Compliance

In addition, as often as this Language Access Plan is updated, each City agency will report to the Department of Civil Rights the following:

- Primary language groups if different than the three languages identified in the City's Language Access Plan
- Steps to notify customers
- Steps employees should take to ensure timely and accurate interpretation services are provided
- Steps employees should take to ensure timely and accurate translation projects are conducted
- Key measures to hire employees with other language skills
- Training received by employees on Language Access issues
- Steps that will be taken to successfully implement Language Access services
- Procedures for handling complaints about Language Access services

In order to report this information, City agencies will also be responsible for keeping detailed records of the Language Access services they provide. These records will be requested by the Department of Civil Rights on a set timetable and may also be requested on a need-to-know basis. Guidance on keeping records and the ensuing reporting will be provided by the Department of Civil Rights.

### Language Identification Chart

The Department of Civil Rights shall develop a poster to be known as the Language Identification Chart. This poster will contain notices that inform LEP Persons of the availability of interpretation and translation services.

Each department/division must post the Language Identification Chart in all waiting areas, reception areas and all other initial points of public entry.

### Accountability

The obligations set forth in this Language Access Plan are an extension of those prescribed in the City of Madison's Title VI Civil Rights Compliance Plan. Complaints regarding LEP services (e.g. poor customer service, timeliness or quality of interpreter services) may be made in the manner described in that plan. The complaint form will be available in the Primary non-English languages, and others upon request.

City departments are required to develop procedures for LEP individuals to submit complaints about services received. City departments will document actions taken to resolve each complaint in a timely manner. City departments shall grant complainants at least 180 days (six months) from the alleged date of occurrence to file a complaint with their department.

# Billing

## Financial Recommendations

The Department of Civil Rights will be responsible for coordinating language access services and paying invoices for those services. A billing and rate sheet will be attached to the plan for each vendor when a new contract is signed.

In order to provide the best service, the Department of Civil Rights will gather an estimate each year of the cost related to interpreting at public meetings and press conferences. For that reason, the Department of Civil Rights will be the centralized agency for language access service funding. This will allow the Department to pay for services throughout all City agencies and accurately track time spent on each project, cost associated with each project, and the number of individuals affected.

The Department of Civil Rights recommends an amendment be approved that increases the line item for language services in the Department of Civil Rights' general fund budget. If an increase is not obtained through the general fund, the Department would recommend reallocating funds from agencies receiving federal grant assistance. The Department of Civil Rights would identify a set percentage or amount of the contract for each year the contract is in place, to be allocated for language services. This process would require agencies to build this cost into their grant budgets.

For the 2018 fiscal year, the Department of Civil Rights has requested an increase of \$158,420.60 to the Language Access budget. The breakdown of additional costs is as follows:

### Public Meetings and Press Conferences

American Sign Language, Hmong, Chinese Mandarin, and Spanish interpreters would be available for press conferences, and public meetings. The total listed below would allow for 450 hours of interpretation.

2018 total: \$77,130

### Translation of Vital Documents

As this plan is implemented, each agency will need to identify vital documents to be translated into Hmong, Chinese Mandarin, and Spanish. Based on the current rates, the estimated cost increase for these translations is \$50,000.

2018 total: \$50,000

### Video Translations

Video Voiceovers - \$975 (3 languages, minimum translation)  
Video ASL in Person - \$72.80/hour

Total: \$1,047.80 per hour of video

This total includes the cost of a minimum translation. Two videos will be recorded per hour, for a total of fifty-four videos (2 per department).

Yearly total: \$28,290.60

### Equipment Maintenance

Maintenance on transmitters, receivers, and charging stations is estimated to be \$3,000 per year.

Total: \$3,000

This estimate does not include regularly requested language services. To get an idea of cost, we should ask agencies what informational videos they may want to do and how many documents they will need translated based on the plan.

This estimate does not include cost of current administration/staff time, or anticipated future staff.

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## Appendices

(note: All appendices shall be included in the final draft)