

Sibley County Human Services
111 8TH Street, P.O. Box 237
Gaylord, MN 55334

LIMITED ENGLISH PROFICIENCY (LEP) PLAN
1-1-13

LEP Coordinator:	Carol Larson, Supervisor	507-237-4000
Financial Services:	Carol Larson, Supervisor	507-237-4000
Social Services:	Tamra Rovney, Supervisor	507-237-4000

Sibley County Public Health & Human Services (hereinafter referred to as PHHS) strives to provide good customer service to all consumers, including person with Limited English Proficiency (LEP). Good customer service includes, but is not limited to, the availability of an interpreter for persons with LEP as well as forms written in a language understood by the consumer (to the extent that DHS provides these forms). The following document serves as the PHHS plan to meet the legal obligation of language access requirements in compliance with Title VI of the Civil Rights Act of 1964; 7 CFR, 273 et seq; and 42 CFR 435 et seq.

IDENTIFYING AND ASSESSING

Identification of LEP consumers will take place at initial contact with the agency. Consumers coming in to the agency will be asked by Office Support staff as to the level of verbal communication. The application forms provided by the Department of Human Services have questions referring to language of preference and these will be reviewed by IM intake staff if applying for public assistance. If the consumer is contacting our agency for Social Services, Public Health or other services, the intake worker will assess the need for an interpreter when speaking with the consumer. "I Speak" cards are available in the agency for Spanish as well as languages not commonly spoken in Sibley County. LEP posters are posted in the public waiting area.

Language assistance is most needed when consumers are making application or recertifying for public assistance and/or WIC, when contacting Child Support and working with establishment of paternity and/or court orders, working with Social Services or Public Health in any aspect. It is also necessary for on-going

case maintenance contacts, i.e., the consumer contacts the agency without a scheduled appointment.

No person will be denied access to PHHS programs or program information because he/she does not speak English or because they speak limited English. PHHS will provide for effective communication between clients with LEP and staff by making appropriate language assistance services available when clients need these services. Clients will be provided with meaningful access to programs and services in a timely manner and at no cost to the client.

MEETING THE NEEDS OF AN LEP PERSON WHOSE LANGUAGE IS NOT COMMON TO THIS AREA

Sibley County has a population of Hispanic speaking people and we are able to sufficiently meet their needs.

We have a part-time interpreter on staff as well as a full-time Social Worker. Through our county-based entity, South Country Health Alliance, we are able to access interpreters for all languages, including those that we currently do not have need for. When bilingual staff is available, PHHS will use its best efforts to assign clients with LEP to bilingual staff who speak their language. Additionally, PHHS subscribes to and makes use of an interpretive language line to assist with interpreting when other avenues are unavailable.

When interpreter services are needed in a language not commonly used, access will be provided as a service from South Country Health Alliance.

Family and friends will be used as interpreters under limited circumstances, i.e., a consumer contacts the agency and needs something basis such as an appointment, dropping something off, simple questions. We may also use family/friends at the time of the initial contact, i.e., someone coming into the agency and requesting an appointment for the purpose of applying for assistance or talking with Social Services. Minor children will never be used as an interpreter.

If an interpreter is needed in-person, rather than over the telephone, the bilingual staff will be used. If unavailable, arrangements will be made to have an

interpreter available at a time and place that is convenient for both the interpreter and the client.

SERVICES TO ILLITERATE

The intake worker will make a determination for each case if the person is able to read and write in his/her native language, if preferred. When a consumer is unable to read or write in his/her native language, a staff person or interpreter will be provided to aid in completion of the necessary forms.

EMERGENCY SITUATIONS

When programs require access to services with short time frames, PHHS will take whatever steps necessary to ensure that all clients, including clients with LEP, have access to services within the appropriate time frames. For example, when a client needs an interpreter or other language assistance services to obtain expedited program services, PHHS goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance.

AVAILABILITY OF INTERPRETERS

PHHS employs a part-time interpreter as well as a full-time social worker. In emergent situations, the part-time person is allowed flexibility in his work schedule to meet the needs.

As much as possible, staff should use these language services in the order set out below:

- a. Bilingual employees.
- b. South Country Health Alliance OnLine Interpreters.
Staff should use the interpreter service when bilingual staff or interpreters are not available or when the language is not one commonly encountered by Sibley County. SCHA interpreters can be reached by dialing 1-866-425-0217.
- c. OnLine Interpreters can be reached by dialing 1-866-800-0287.

Calls must be authorized by a Supervisor or Director. Office Support Staff will assist with the calls as a Secured Access Code is needed when calls are made.

d. Using Family and Friends as Interpreters.

Staff is asked to accommodate clients' wishes to have family or friends serve as interpreters within the guidelines set out below. Staff must keep in mind both client confidentiality and interpreter competency and should also follow the rules set out below.

The use of family and friends as interpreters will be used only in limited circumstances. Staff is encouraged to use a. - c. above whenever possible. The use of minor children as an interpreter should never occur.

PHHS may expose itself to liability under Title VI if it requires, suggests or encourages a client with LEP to use friends, minor children, or family members as interpreters because family, friends or minor children may not be competent to serve as interpreters.

Use of family or friends could result in a breach of confidentiality or reluctance on the part of the clients to reveal personal information critical to their situations. Family and friends may not be competent to act as interpreters because they may not be proficient enough in both languages, may lack training in interpretation and/or have little familiarity with specialized program terminology.

COMPETENCY STANDARDS FOR INTERPRETERS

Interpreters used for LEP services must be bilingual. When using interpreter services from a recognized agency such as an interpretive language line, competency is assumed. PHHS will make sure that interpreters service the interpreter demonstrates competency. To be considered "competent" to provide interpreter services, the interpreter must be proficient in both English and the target language and be able to convey information in both languages accurately, have had orientation/training that includes the skill and ethics of interpreting, have basic knowledge in both languages of specialized program terms or concepts, and be sensitive to the client's culture.

LEP PLAN

The agency will post a notice in the lobby, in Spanish and English, informing the public of the LEP Plan. The Plan will be available for public viewing during regular business hours. The notice will also state that language assistance services are offered free of charge, in a timely manner, and during all business hours. The LEP Plan will be available in English but interpreters will be available to translate the plan for those who do not speak English who wish to read it. The words "Limited English Proficiency Plan" in the Spanish language will be posted next to the LEP Plan so clients with LEP know that such a plan exists and that they can get help to read it.

PROCEDURE FOR USING/DISTRIBUTING TRANSLATED FORMS

PHHS stocks a number of documents and forms that are available in languages other than English. Additionally, Minnesota Department of Human Services forms are available in English and other languages on the DHS website at <http://edocs.dhs.state.mn.us/index.htm>.

Regularly used PHHS forms will be made available in translated form by posting them in a central location in the Sibley County Human Services lobby at 111 8th Street, Gaylord, Minnesota. At the appropriate times, PHHS staff must send clients the preferred translated forms automatically when the same forms are sent to the clients in English.

All Minnesota Department of Human Services forms are available in other forms to people with disabilities. For TDD/TTY users, contact Minnesota Relay at 711 or (800) 627-3529. For Speech-to-Speech Relay, call (877) 627-3848.

NOTICE OF RIGHTS TO LANGUAGE ASSISTANCE

PHHS staff must inform all clients with LEP of the public's right to free interpreter services, these services must be provided in a timely manner and must be available during Sibley County business hours.

PHHS staff will use "I Speak" cards to help clients with LEP be able to identify their language needs for staff. PHHS will also use "I Speak" posters in the agency

to help inform clients that language interpreters are available at no cost to the client.

STAFF TRAINING

Upon approval of this Plan, staff training will be conducted. This training will be repeated annually. At the time of training, all staff will receive a copy of the Plan.

The effectiveness of the Plan will be reviewed annually. At the time of the review, input will be sought from agency staff and Public Health as to the effectiveness of the Plan.

MONITORING

On at least an annual basis, the LEP Plan will be reviewed for effectiveness and the LEP Coordinator will coordinate it in Sibley County. The evaluation will involve consultation with representatives of the Financial Unit and the Social Services Unit to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies.

COMPLAINT RESOLUTION

Complaints on provision of language assistance can be made to the Director of this agency. Upon receipt of a complaint, the Director will meet with the consumer and/or their representative and an interpreter or the OnLine Interpreters to work on resolution. If the dispute cannot be resolved, the consumer will be advised, in a language understandable to him/her, of the process to follow to make a complaint to the Department of Human Services or the Office of Civil Rights.

Agency contact on LEP and Civil Rights matters: Vicki Stock, Director. Phone (507) 237-4000; FAX (507) 237-4031 or e-mail vicki@co.sibley.mn.us.

LEGAL CITATION

65 Fed, Reg.52762 (2000)