

<b>PROGRAM:</b>	Administration
<b>TITLE:</b>	Limited English Proficiency (LEP) Plan
<b>POLICY:</b>	All clients will be provided with free, professional interpretation services in the language they prefer.
<b>PURPOSE:</b>	To ensure equal access to services for all clients.

---

### PROCEDURE:

#### A. Purpose:

The purpose of this LEP Plan for Gulf Coast JFCS is to ensure meaningful access to program services and benefits for persons with limited English proficiency.

The agency recognizes the importance of effective and accurate communication between its personnel and the community we serve. Language barriers can impede effective and accurate communication in a variety of ways. Language barriers can inhibit or even prohibit individuals with LEP from accessing and/or understanding important rights, obligations, and services, or from communicating accurately and effectively in difficult situations.

A client has LEP when he/she is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Gulf Coast JFCS staff. It is not always easy to identify a person with LEP. Some clients may know enough English to manage basic life skills, but may not speak, read, or understand English well enough to understand some of the complex issues they may encounter within the human services systems, i.e., legal, medical, mental health or benefits language. These clients would qualify as persons with LEP.

#### B. Statutory Authority:

Title VI of the Civil Rights Act of 1964 provides that no person shall be subjected to discrimination on the basis of race, color or national origin under any program that receives Federal financial assistance. The prohibition of discrimination based on national origin includes the prohibition of discrimination against LEP persons, individuals who cannot speak, read, write or understand English well enough to communicate effectively with health and social service providers.

According to the Office for Civil Rights (OCR), in order to avoid discrimination on the basis of national origin against applicants, clients, and members of the public with limited English language proficiency, adequate steps must be taken to ensure that such persons receive the language assistance necessary to allow them meaningful access to services, free of charge. It is the goal of this plan to meet the statutory requirements of Title VI of the Civil Rights Act of 1964, the policy guidelines of the Office for Civil Rights Policy, and the Department of Justice, Coordination of Enforcement of Non-discrimination in Federally Assisted Programs, such as those operated by Gulf Coast JFCS.

#### C. Policy:

No person will be denied access to Gulf Coast JFCS programs or program information because he/she does not speak English or speaks limited English. Gulf Coast JFCS will provide language assistance services as needed for clients with LEP to provide meaningful access to programs and services and ensure effective communication. These language assistance services are offered at no cost and in a timely manner during business hours.

Specific language needs or preferences will be assessed for all persons presenting to Gulf Coast JFCS. Staff must inform all clients of their right to interpreter services at no cost to them and offer interpretation and/or translation services in a language they understand and in a way that preserves confidentiality.

Gulf Coast JFCS will use a Language Identification Flashcard or "I Speak" cards to help clients with LEP communicate their language needs to staff. These aids in poster form will also be displayed in the reception areas of all Gulf Coast JFCS locations.

Gulf Coast JFCS will ensure that staff interpreters are 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 as well as be sensitive to the client's culture.

Gulf Coast JFCS will strive to hire bilingual staff as appropriate to meet access needs for each program.

#### D. Definitions:

1. Primary Language means an individual's native tongue or the language in which an individual most effectively communicates. Gulf Coast JFCS staff should avoid assumptions about an individual's primary language. For example, not all individuals from Central America speak Spanish fluently. Instead, some Central Americans may claim an indigenous language as their native tongue. The staff should make every effort to ascertain an individual's primary language to ensure effective communication.
2. LEP designates individuals whose primary language is not English and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in certain types of communication, i.e., speaking or understanding, but still be LEP for other purposes, i.e., reading or writing. Similarly, LEP designations can be context-specific; an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other situations.
3. Interpretation is defined as a spoken or visual explanation provided to help two or more people who do not speak the same language to communicate with each other. It is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
4. Translation is defined as a written version of a document provided in a different language than the original document. It is the replacement of written text from one language (source language) into an equivalent written text in another language (target language).
5. Bilingual refers to the ability to use two languages proficiently.
6. Gulf Coast JFCS Interpreter is an on-call Gulf Coast JFCS employee, who has been hired specifically to provide spoken language interpretation. Interpreters are requested using a specific procedure through VOICES. The service is provided free of charge to the individual client but charged to the appropriate Gulf Coast JFCS program operating budget internally.

#### E. Procedures to Obtain Interpreters:

1. When a potential client seeks oral interpretation services from Gulf Coast JFCS, first contact staff will inquire what language is their preference and whether they desire an interpreter if preference is other than English. Language Identification Flashcard or "I Speak" cards will be used to help client identify their language needs. Family members, friends, etc., may also provide assistance with this assessment.
2. Whenever an interpreter/translator is needed, Gulf Coast JFCS staff are responsible for completing a VOICES Interpreter Request Form# 1254 requesting the service for their client/potential client. All information should be provided.
3. This form will be submitted by fax, email, mail or in-person to VOICES staff at the Icot office that will coordinate the scheduling process between interpreter, Gulf Coast JFCS staff and client. The telephone number and e-mail are as follows: 727-450-7273 and/or [interpreter@gcjfcs.org](mailto:interpreter@gcjfcs.org).

#### F. Telephone Interpreter Services:

1. Staff will use the Language Line Services for interpreter assistance when an in-person interpreter in the required language is not available. Approval from Supervisor is required prior to accessing the Language Line.

#### G. Use of Family and/or Friends as Interpreters:

Staff must not require, suggest, or encourage a client with LEP to use family or friends as interpreters. Family or friends may not be competent to serve 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 technology. Use of family or friends could also result in a breach of confidentiality or reluctance on the part of clients to reveal personal information critical to their situations.

1. Family members or friends of the limited-English-proficient person may only be used as interpreters/translators if specifically requested by that individual after staff has made an offer of a free interpreter/translator and if doing so does not compromise the effectiveness of the interpretation and/or violate the client's confidentiality. Staff's offer of an interpreter and the client's response must be documented in the client's file. These restrictions are to ensure confidentiality of information and accurate communication.
2. Clients who wish to have bilingual friends and family present at meetings or interviews may do so; however, the presence of such persons does not affect the obligation of Gulf Coast JFCS to provide interpreter/translator services.
3. The use of minor children as interpreters/translators by Gulf Coast JFCS is prohibited.

#### H. Provision of Program Services:

1. All Gulf Coast JFCS staff will ensure that written notice of the right to have an interpreter at no charge is provided to all individuals. This will include posters at all building entrances, direct explanation to new clients at intake.
2. All Gulf Coast JFCS staff will use interpreters for client interactions whether in person or by telephone.
3. All Gulf Coast JFCS staff will provide translated documents for key information requiring client signature. (Notice of Privacy Practices and Consent to Exchange Healthcare Information presently available in Spanish, Bosnian/Croatian/Serbian, Haitian/Creole.) If a form is not required to be translated (by four factor analysis) the form will be interpreted to the client and this will be indicated on the signature line and in the client case file.

#### I. Documentation Regarding Use of Interpreters:

Each time there is a contact with a client of LEP and an interpreter/translator is offered, accepted, denied or arranged, it must be documented in the case narrative/notes by staff working with the client along with the client's response (whether they accepted or denied the request).

#### J. LEP Training for Gulf Coast JFCS Staff:

Gulf Coast JFCS will provide information about the LEP Plan in the Gulf Coast JFCS New Hire Orientation.

#### K. Monitoring of LEP Plan:

On an annual basis, Gulf Coast JFCS will review the LEP Plan and update it as needed.