



## **Policy and Procedure for Providing Meaningful Communication with Persons with Limited English Proficiency**

### **POLICY:**

Orange County IDA (“the IDA”) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our incentive programs and other benefits. The policy of the IDA is to ensure meaningful communication with LEP clients and their authorized representatives involving their application for incentives, the execution and fulfillment thereof, etc. The policy also provides for communication of information contained in vital documents, including, but not limited to, applications for incentives, data confirmation letters, etc. All interpreters, translators and other aides needed to comply with this policy shall be provided without cost to the person being served, and clients and their representatives will be informed of the availability of such assistance free of charge.

Language assistance will be provided through the use of competent bilingual staff, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

The IDA will update and monitor the implementation of this policy and these procedures, as necessary.

## PROCEDURES:

### 1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

The IDA will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card, or “I speak cards,” (downloaded from [www.lep.gov](http://www.lep.gov)) to determine the language. In addition, when records are kept of past interactions with clients or their representatives, the language used to communicate with the LEP person will be included as part of the record.

### 2. OBTAINING A QUALIFIED INTERPRETER

The Finance & Compliance Manager is responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
- (b) Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- (c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Some LEP persons may prefer or request to use their own representative or associate as an interpreter. However, representatives or associates of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the IDA. Such an offer and the response will be documented in the client’s file. If the LEP person chooses to use a representative or associate as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the representative or associate is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children and other clients will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

### 3. PROVIDING WRITTEN TRANSLATIONS

(a) When translation of vital documents is needed, the IDA will submit documents for translation into frequently-encountered languages to the Finance & Compliance Manager. Original documents being submitted for translation will be in final, approved form with updated and accurate information.

(b) The IDA will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

(c) The IDA will set benchmarks for translation of vital documents into additional languages over time.

### 4. PROVIDING NOTICE TO LEP PERSONS

The IDA will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices will be posted in intake areas and included in outreach documents.

### 5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

Periodically, the IDA will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, the IDA will assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from clients, etc.