
 <b>MUNICIPALITY OF ANCHORAGE O P E R A T I N G P O L I C Y / P R O C E D U R E</b>	P&P No. <b>16 - 6</b>	<b>Page 1 of 7</b>
	Effective Date: <b>September 1, 2018</b>	
Subject: <b>Language Access Policy</b>	Supersedes No. <b>N/A</b>	Dated: <b>September 1, 2018</b>
	Approved by: 	

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## 1. PURPOSE

To establish a policy to ensure compliance with civil rights laws to effectively provide information about municipal services, programs, and activities to residents and visitors with Limited English Proficiency (LEP) or who are deaf or hard-of-hearing.

## 2. POLICY

It is the policy of the Municipality of Anchorage to provide timely and meaningful access to LEP and deaf or hard-of-hearing individuals in the conduct of municipal business. The MOA will utilize readily accessible telephonic language lines and professional face-to-face interpreters in the conduct of municipal business rather than to rely on less effective communication methods, or including friends, family and children, to interpret.

## 3. ORGANIZATIONS AFFECTED

All Municipal agencies.

## 4. REFERENCES

Title VI of the Civil Rights Act of 1964, and implementing regulations, which prohibit discrimination based on national origin (42 U.S. Code 2000d). The Justice Department has issued guidance which includes a four factor analysis to determine the level of need for language services.

Presidential Executive Order 13166 (August 11, 2000) requires any state or local agency that receives federal funding to examine the services they provide, identify any need for services to those with Limited English Proficiency. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency.

## 5. DEFINITIONS

- A. Essential Public Information: Any information used by a department when dealing with the public which is necessary to accomplish the department's mission and with respect to public safety, public health, and economic development.
- B. Department Language Access Representative: The employee designated by the department director to be responsible for the department Language Access Plan (LAP) program.
- C. Four Factor Analysis: The procedure to determine the level of need for language services by documenting: 1) the number and proportion of LEP persons as reported by the most recent census; 2) the frequency with which LEP persons visit various MOA locations; 3)

the nature and kind of programs or activities LEP persons use; and 4) the available resources and overall costs for LEP services.

- D. Frontline: Applies to departments and/or personnel that have regular and substantive contact with the public via in person or telephonic communication. See addendum for MOA organization chart with highlighted departments required to have written Language Access Plans.
- E. Interpretation: The immediate spoken communication of meaning from one language (the source language) to another (the target language).
- F. Interpreter: A person who is bilingual or multilingual and possesses the ability to successfully convey a message from one language to another through oral communication.
- G. Language Access Plan (LAP): Department specific documents outlining the procedures and practices that the department will implement to provide language access services to LEP individuals.
- H. Limited English Proficient (LEP): Someone who is not able to speak, read, write or understand English at a level that allows the person to interact effectively with department staff. Individuals maintain the right to self-identity as a LEP person and should not in any circumstances be expected to pay for translation or interpretation services in order to effectively communicate with the department.
- I. Mayor's Language Access Liaison: The employee designated by the Mayor to support the LEP program and to support the Department Language Access Representative.
- J. Telephonic Interpretation: A service that connects human interpreters via telephone to individuals who wish to speak to each other but do not share a common language. The telephone interpreter converts the spoken language from one language to another, enabling listeners and speakers to understand each other. Interpretation over the telephone most often takes place in a consecutive mode, which means that the interpreter waits until the speaker finishes an utterance before rendering the interpretation into the other language.
- K. Translation: The written communication of meaning from one language (the source language) to another (the target language).
- L. Translator: A person who is bilingual or multilingual and possesses the ability to translate from one language to another in written form.

## 6. RESPONSIBILITIES

- A. The Mayor's Office shall:
  - i. Designate a Mayor's Language Access Liaison; and

- ii. Facilitate publication of this policy and the department LAPs on municipal websites.

B. The Mayor's Language Access Liaison shall:

- i. Designate which municipal departments qualify as "frontline" for purposes of this policy;
- ii. Provide support and technical assistance to frontline departments and employees to assist in the development and implementation of the department's language access plan;
- iii. Establish a reporting format template for department representatives to use for annual Language Access Plan updates;
- iv. Manage the content on the language access website;
- v. Take reasonable steps to inform LEP individuals and stakeholders about the availability of LEP services and the complaint process;
- vi. Work with Language Access Representatives to develop protocols used to measure department utilization of telephonic and in-person interpretation, translated documents and other currently unidentified needs in effort to provide language access services; and
- vii. Monitor and address feedback from the public and LEP persons which has been gathered through the Language Access Complaint form or through other forms of communication, i.e. email, phone calls, in-person communication, etc.

C. The Department Language Access Representative shall:

- i. Be designated by the department director;
- ii. Be responsible for ensuring that their department is in compliance with this policy;
- iii. Use reporting format template to record: language services provided to LEP persons, language access plan utilization, and recommendations for changes to be shared periodically with the department director and the Mayor's Language Access Liaison;
- iv. Work with the Mayor's Language Access Liaison in developing the department's Language Access Plan; and
- v. Prepare annual report, reviewing the department's Language Access Plan and resources.

D. Frontline Municipal Departments shall:

- i. Develop and implement department specific Language Access Plans to provide services to LEP persons at no cost;
- ii. Ensure that frontline employees are trained in language access policies and procedures for assisting LEP populations, including efficient communication techniques, how to secure an interpreter, and the effective use of an interpreter;
- iii. Ensure Language Access Services and iSpeak posters are posted at public service counters and on the department's web page;
- iv. Allocate funds in the department annual budget to cover the cost of language access services, or be responsible for finding those funds from independent grant sources; and
- v. Develop billing procedures and maintain billing records for employees' use of professional interpretation services.

E. Non Frontline Municipal Departments shall:

- i. Be exempt from implementing a Language Access Plan; and
- ii. Keep their employees aware and current with the development of the Municipality's Language Access Plan and resources.

F. Frontline Employees shall:

- i. Implement their department's language access plan;
- ii. When working with a LEP person:
  - a. Utilize "iSpeak Language Identification" posters to identify language and communication needs;
  - b. Upon determining language needs, determine the appropriate language resource to use:
    - 1) Professional telephonic interpreter, current MOA vendor is CTS Language Link;
    - 2) Professional in-person interpreter, current MOA vendor is Alaska Institute for Justice Language Interpreter Center;
    - 3) Bilingual staff; and/or
    - 4) Other community resources.

c. Refer to addendum for more about interpretation resources.

G. Essential Public Information and Vital Documents shall be:

- i. Selected by department staff and the Mayor's Language Access Liaison;
- ii. Submitted to both CTS Language Link and Alaska Institute for Justice Language Interpreter Center for translation quote; and
- iii. Made available on department's webpage.

## **8. LANGUAGE ACCESS COMPLAINT PROCESS**

A. A complaint may be made in person, in writing, or online. All complaints shall be directed to the Mayor's Language Access Liaison:

Mayor's Language Access Liaison  
632 W 6th Avenue, Suite 840, Anchorage, AK 99501  
(907) 343-7100

Online: [https://moa\\_onlineforms.formstack.com/forms/language\\_access\\_complaint](https://moa_onlineforms.formstack.com/forms/language_access_complaint)

- B. Any LEP individual has the right to file a complaint where he or she believes that the Municipality did not provide necessary LEP services as appropriate.
- C. Frontline Departments shall take reasonable steps to inform LEP individuals and stakeholders about the complaint process. This shall include posting information about the complaint process and making it available in the most commonly spoken languages.
- D. The complaint should specify the date, individuals involved, the nature of the complaint (i.e. the interpreter was summarizing, or a LEP individual was denied services because they did not bring their own interpreter), and the complainant's contact information.
- E. The language access liaison shall investigate whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance. The complainant will be informed in writing of the outcome of the investigation. If the coordinator makes a finding of noncompliance, the letter to the complainant shall include the steps that will be taken to correct the noncompliance.

## **9. ANNUAL REVIEW DATE**

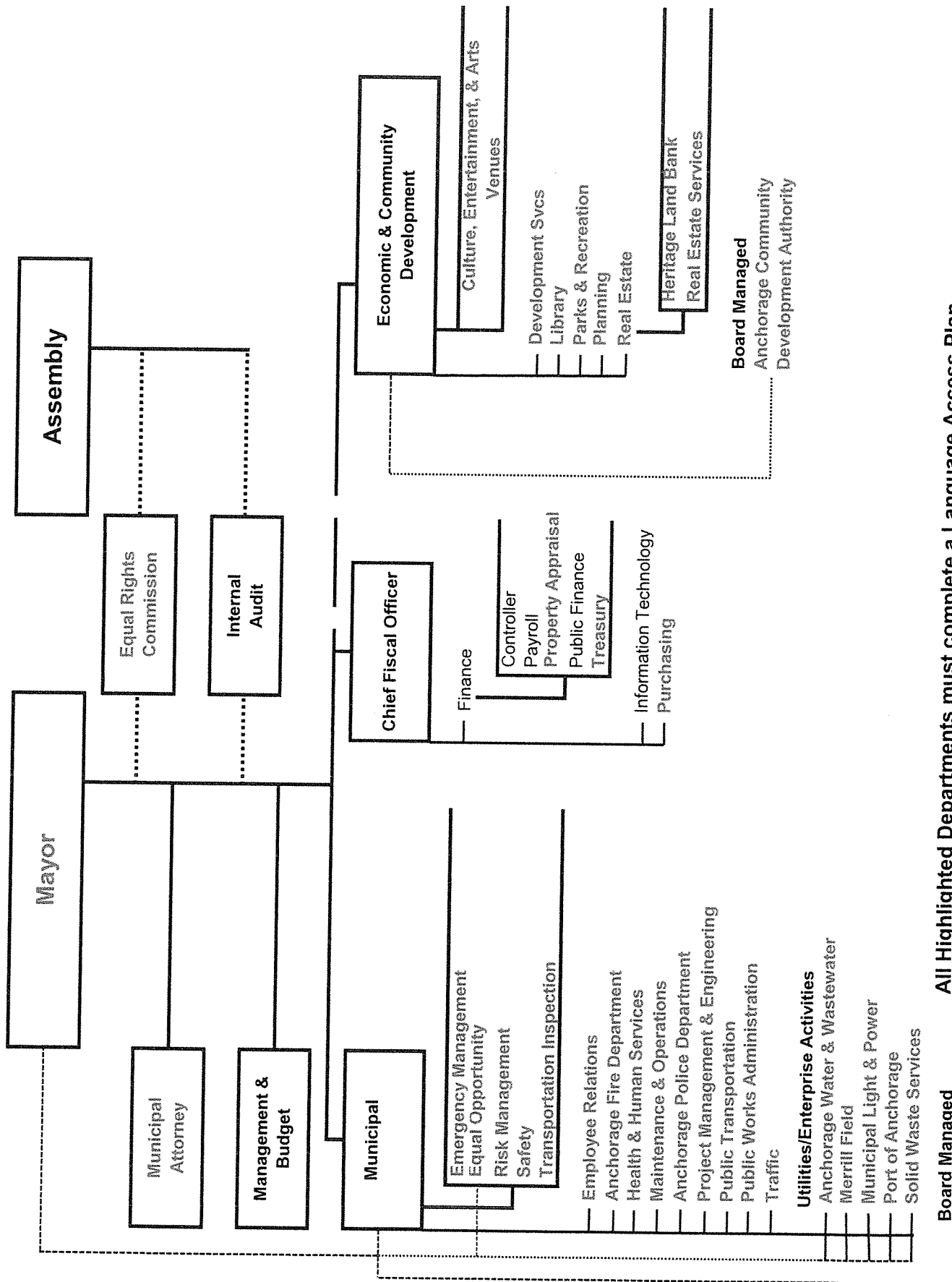
- A. Annual departmental reports will be due to Mayor's Language Access Liaison for review and assessment on or before July 31.
- B. Mayor's Language Access Liaison will submit an overview report to the Mayor and Municipal Manager for review on or before September 31.

**10. ADDENDUMS**

- A. Municipal organizational chart
- B. Translation resources



# MUNICIPALITY OF ANCHORAGE



**Board Managed**  
Police & Fire Retirement System

**All Highlighted Departments must complete a Language Access Plan**



## P&P 16-6 Addendum B - Translation Resources



### Municipality of Anchorage Language Access Services Quick Guide

**\*\*Please note that the MOA has contracts with two providers – their information is below\*\***

Walk-ins and Conference calls

#### **Telephonic assistance with customer**

1. Identify Language using iSpeak booklets, poster or verbal indication
2. Call **1-888-338-7394**
3. Key in Department Account Number **xxxxx** followed by #
4. Key in Employee number, worksite number or other identification number as assigned by department followed by #
5. Tell operator the language in which you need an interpreter
6. The operator will connect you with an interpreter

If the client is not in person but on the phone, press 9 to reach Customer Service to be conferenced in with an interpreter.

#### **Translation services**

1. Identify Language using iSpeak booklets, poster or verbal indication
2. Select the document you need to have translated
3. Select the language(s) you need to have document translated into
4. Email [Quotes@ctslanguageline.com](mailto:Quotes@ctslanguageline.com) the document and the languages you are requesting
5. They will send you a quote via email
6. If the quote is accepted, they will have you sign a contract and request payment

#### **In-person interpreter or written translation**

1. Language Interpreter Center Assistant – Mai La Vang at [maila.vang@akijp.org](mailto:maila.vang@akijp.org) or by calling direct: 907-297-2760 - [www.akijp.org](http://www.akijp.org)
2. She will build a quote for the services you need
  - a. For Translation: Provide document(s) and language(s)
  - b. For In-person Interpreter: Provide language needed, date, time and name of LEP person (this is so they can make sure the interpreter is not known to the LEP person)
3. You can accept the quote and be billed
4. The services will be scheduled

In-person interpreter services must be scheduled a minimum of 3 days in advance, with a required 2 hour minimum charge (\$140 for first two hours and \$70.00/hour thereafter).

### **Sign Language**

1. Hand person card: “How can I help you?” Exchange notes to find out the purpose of the visit.
2. Ask the person what accommodations are needed to provide effective communication.
3. If an interpreter is requested, ask if they have a preferred interpreter.
4. Call the preferred interpreter or a sign language interpreter if requested.
  - RNR Interpreting: 907-317-2235 or [mrinterpreting@aol.com](mailto:mrinterpreting@aol.com)
  - Linda Suter: 907-248-6622 or [lsuter@acsalaska.net](mailto:lsuter@acsalaska.net)
  - [Relay Service \(statewide\): 7-1-1 or 1-800-770-8255](http://RelayService.com)

Revised – June 2018