

**Hennepin County  
Limited English Proficiency Plan  
Health and Human Services Departments**

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# Hennepin County Limited English Proficiency Plan

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**LEGAL BASIS AND PURPOSE**

The following document serves as the plan for the Hennepin County Human Services and Public Health Department and the Hennepin County Medical Center to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR 273 et seq.; and 42 CFR 435 et seq.

This document also serves as a model to show Hennepin County’s commitment to provide meaningful access to all individuals accessing any of Hennepin County health and human services. At all times, non-English speaking clients will be guaranteed service from the Hennepin County Human Services and Public Health Department and the Hennepin County Medical Center which from hereon will be identified as the County Departments.

A notice to Limited English Proficiency (LEP) individuals was sent out by the Minnesota Department of Human Services in April of 2001 informing them of their right to a free interpreter. LEP individuals are informed of the availability of free interpreter and translation services when it appears that the individual is not able to communicate effectively in English. Such services are provided during all normal business hours and when an emergency has been determined to exist during non-business hours. Notice of availability of free interpreter services also occurs in revised signage at primary points of contact for County departments’ reception areas.

At no time does a Hennepin County employee or contractor indicate – either verbally or in writing – that any LEP applicant or client accessing County services will be charged for interpreter or translation services.

Dissemination of the Limited English Proficiency Plan occurs via many routes. Any individual is able to access the plan via the Internet. All Health and Human Services employees have access to it via the Hennepin County Intranet/Internet and through meetings and training sessions. Area Legal Aid offices, contractors with Hennepin County, and community partners have access to the plan via the Internet. A copy is also posted on the Hennepin County Office of Multi-Cultural Services’ website for public review. LEP individuals can obtain copies/translations upon request.

Further questions regarding this plan and its implementation may be directed to:

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## **BACKGROUND**

In 1999 County Administration responded to the increased need for culture- and language- specific services by implementing the Project for Multi-Cultural Service Delivery (now renamed the Hennepin County Office of Multi-Cultural Services) which provides a central point of access for county services to refugees, immigrants and other New American populations. While the Office of Multi-Cultural Services can meet the needs of many New Americans, the demand for services is too great across many immigrant groups to be able to respond adequately. Hennepin County is therefore reliant on the programs, processes, and staff in other departments to provide services to these populations.

In March of 2000, Hennepin County engaged in a comprehensive assessment of the Limited English Proficiency (LEP) populations residing in Hennepin County, the current services in place to meet the needs of our LEP populations, and the availability of spoken language interpreters and translated documents. Hennepin County has also reviewed its signage across all County departments, as well as how well staff and our LEP populations understand the right to free language services.

*The Hennepin County Limited English Proficiency Plan* sets forth the policies and procedures for ensuring equal access to linguistically appropriate services for persons residing in Hennepin County as well as a process to address issues of training for County staff and contracted providers and the use of appropriate signage.

## **LANGUAGE ASSISTANCE RESOURCES OFFERED**

### **Limited English Proficiency Populations Being Served**

County departments utilize a variety of databases to track and record language data. The utilization of the MAXIS and MMIS systems is one such source as are SSIS and HSIS and other individual department systems. However, identifying common LEP populations is a difficult task which has required Hennepin County to look at a variety of mechanisms to examine our LEP populations and determine the need for language services.

The State of Minnesota identifies the fifteen largest LEP populations as the following: Amharic, Arabic, Burmese, Cantonese, French, Hmong, Karen, Khmer (Cambodian), Korean, Laotian, Oromiffa, Russian, Somali, Spanish, and Vietnamese but does not differentiate between the size of each population group. Hennepin County continues to work with the Minnesota Department of Human Services and County Departments to identify all critical and vital documents for these fifteen language groups where translation is needed in order to ensure accessibility of services. We utilize current Hennepin County bilingual staff and interpreters from these language groups to facilitate transactions within the staff person's department and across all County departments whenever possible. In the event that a department does not have on-site assistance for all

of the fifteen language groups identified above, contracted interpreter services are used to meet the language need. For all other language groups Hennepin County utilizes its current contracted interpreter agencies for services. A listing of the contracted interpreter agencies can be found or on file at the Office of Multi-Cultural Services on the internet at the following site:

<http://www.hennepin.us/residents/human-services/multi-cultural-services>

### **PROCEDURE TO ACCESS LANGUAGE ASSISTANCE**

#### **Means of Providing Interpretive Services**

Hennepin County currently employs a workforce of around 13,000 individuals, many of whom are bilingual. While not all bilingual staff speak one of the ten language groups identified in the Limited English Proficiency Assessment, many departments have a host of bilingual staff available to meet the needs of our LEP individuals. While there is no current process in place to ensure that individual departments share bilingual and interpretive resources with other County departments, many language issues can be bridged by utilizing the staff of the Office of Multi-Cultural Services and contracted interpretive services.

Hennepin County Departments continues to develop criteria specific to their individual departments as to the best methodology for utilizing the skills of bilingual staff persons as workload demands often prevent bilingual staff from assisting with language needs for other agency personnel. The protocol to be followed by all Hennepin County Departments for accessing bilingual services is outlined below.

1. Use of bilingual staff: Each County department will be provided a list of all staff persons within their department that have been certified as bilingual through the Human Resources Department testing process. *Due to the constantly changing workforce composition and requests for employees to work outside of their department and workload issues, these lists change frequently. Hennepin County remains committed to providing this material in the timely manner – through use of department-wide e-mail and/or information posted on the department's Intranet website at <https://hconnect.hennepin.us/>.* Upon receipt of the bilingual staff list, the Limited English Proficiency Coordinator for each department will work with department management to identify appropriate cases that should be assigned to bilingual staff. Assignments are based on normal workload for non-bilingual staff according to departmental standards and other workload considerations for the individual.
2. In the event that an insufficient number of bilingual staff are available to assist with spoken language needs, staff and/or contracted interpreters for that department are to be accessed for services for these language groups. As not all departments have staff interpreters on site, the protocol may vary from department to department.

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3. Hennepin County has begun to explore partnerships with local universities for language assistance in order to expand our access to languages. The use of volunteers, students and interns who have been through the language testing process offered through Human Resources are made available to work with the County staff person to meet the language needs of Hennepin County's LEP populations. *This group of individuals is constantly changing. Hennepin County remains committed to providing this material in the same timely manner in which it has provided it in the past – through use of department-wide e-mail and/or information posted on the department's Intranet website at <http://hcinet/Admin/>.* If a volunteer, student or intern has not been tested and determined to be competent by Human Resources, they will not be eligible to provide language services.
4. An additional service available to staff is Video Remote Interpreting (VRI). VRI may be used for available languages as another avenue of interpreting. This technology is offered through a County contracted vendor that can be found via the Hennepin County Intranet.
5. Upon identifying a language need that cannot be met by utilizing staff in steps 1-4 above, the County staff person will access one of the contracted Hennepin County interpreter services agencies for that department. Staff are to be provided a list of available contracted interpreter services agencies, languages available, and rates. This list has already been made available for staff in Hennepin County Departments via the Intranet. Staff may utilize any contracted interpreter service agency on this list in order to meet the language needs of the LEP client.
6. **At no time will friends or family members of the LEP client be utilized to provide interpretive services, even in the event of an emergency.**
7. In the event that no resources for spoken language interpretation can be secured through the above process, the staff person shall immediately notify the Hennepin County Limited English Proficiency Manager who will work to secure the resources necessary to meet the language needs of the LEP person are met.
8. When confronted with a situation in which the client is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the LEP individual in the completion of necessary forms and documents. Preferably, an on-site interpreter will be used. However, if that is not possible, an interpreter from a contracted agency will be utilized.
9. When individuals require access to services within short time frames, Hennepin County personnel – in consultation with a Supervisor or Manager – will take whatever steps deemed necessary to ensure that all clients, including LEP clients, have access to services within the appropriate time frame. The County departments' goal is to make its services accessible within the required time

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frame, whether that means using an interpreter or another appropriate type of language assistance.

County departments also utilize translated forms to assist in applicant/client/patient interaction and communication. Forms translated by the State of Minnesota Department of Human Services can be found by accessing the Department's website at <http://mn.gov/dhs/general-public/publications-forms-resources/edocs/index.jsp>. Case records continue to be updated to reflect the client's preference for translated materials. Employees of County departments are responsible for providing available translated forms at appropriate times. A new client is asked his/her preference for translated forms prior to being given English-only forms. If the LEP individual is unable to read his/her own language in order to complete necessary forms, the above procedures ensure that the LEP individual is provided a competent interpreter through the assistance of the County employee.

### **Maintenance of Lists and/or Directory of Bilingual Staff**

Tracking of Hennepin County's bilingual workforce on a countywide basis is performed by utilizing information from the County's Payroll and Accounting Department which identifies those individuals who receive a bilingual pay differential. Efforts continue to be made to make this departmental information available countywide. Hennepin County departments will continue to provide a list of bilingual staff in the same timely manner in which they have provided them in the past – through the use of department-wide e-mail and/or information posted on the department's Intranet website. This practice will allow staff members to identify language resources within their respective department.

Interpreter services resources relevant to the entire County are stored on the Office of Multi-Cultural Services Intranet site. This arrangement allows for staff across County departments to have easy access to the information, which is maintained and updated by the Limited English Proficiency Manager.

### **Rules Governing Interpreters and Bilingual Staff**

In September of 1999, Hennepin County convened a group to begin looking at developing standards for interpreter services that would impact all Hennepin County departments. An interim report published in October of 2000 makes recommendations for the development of a set of countywide standards for any person doing interpreting in any Hennepin County Department. The Interim Report of the Interpretive Services Subcommittee outlined recommended ethical and competency standards, as well as guidelines for working with any person doing interpreting (**Attachment D**).

These recommendations led to the development of a curriculum designed to train anyone doing interpreting in the delivery of County services on the ethics and competencies of providing interpreting services. A pilot session of “Introduction to the Ethics and Competencies of Interpreting” was held in late 2004. Since 2006, quarterly sessions of this training has been open to all Hennepin County bilingual staff, volunteers, and interns. **It is the expectation that all Hennepin County Bilingual Staff, Staff Interpreters, Intermittent Staff Interpreters, Volunteers, Students, and Interns who work with LEP populations complete this training.** Information on when and where these trainings are held can be found on Personal Registrar, and announcements are made prior to training session dates via HC Weekly.

### **Ensuring Interpreter Competency**

In the interest of ensuring consistent standards for all individuals who provide interpreting in the delivery of Hennepin County services, it is the County’s goal to enact a new set of requirements for these individuals. These requirements include:

1. Completion of the “Introduction to the Ethics and Competencies of Interpreting” course and a post-training quiz score of at least 70%. (Anyone who has taken the University of Minnesota basic interpreting classes in the Program in Interpreting and Translation can opt to take the test and be exempted from this course.)
2. Proficiency certification in English language – conducted by the Hennepin County Human Resources Department
3. Proficiency certification in the non-English language – conducted by the Hennepin County Human Resources Department
4. Proficiency certification in Hennepin County’s “Business Lines” vernacular, systems, procedures, policies, and practices – conducted by the hiring service area/department.

The Hennepin County Human Resources Department recognizes County staff members that have been tested for spoken and written language skills as “bilingual”. Bilingual staff members receive a pay differential for utilizing their language skills in meeting the needs of LEP populations.

### **Rules for Contracted Interpreters**

Hennepin County utilizes contractual language to ensure that outside vendors are bound by the legal requirements of the OCR Guidance Memorandum. Part of the assessment includes the review of training standards of contracted interpreters. All interpreting agencies contracted with Hennepin County are required to demonstrate that the interpreters they employ receive training in the ethics and competency standards of interpreting comparable to that which is utilized by Hennepin County. In addition, agencies are required to ensure that their interpreters have been tested on their language proficiency. The Limited English Proficiency Manager makes visits to these agencies on

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an as-needed basis to review their training and testing methods and how they recruit and retain interpreters.

As it stands, contracted interpreters are expected to adhere to the ethics and competency standards employed by Hennepin County. Options for training include inviting contracted interpreters to attend the orientation developed by the Interpreter Training Committee or encouraging them to attend classes offered by the University of Minnesota.

Service providers who are contracted with Hennepin County as business associates are encouraged to buy interpreter services from the County's contracted interpreter vendors, as they may receive a better rate for the interpreter services through these agencies

### **Scheduling Interpreter Services**

Due to the fact that each department has the best information on the individual LEP populations accessing or in need of its services, a universal plan to coordinate interpreter services cannot be established. Departments will, however, follow the existing protocol for securing interpreter services. When a LEP client/patient requests County services and no bilingual staff or County interpreters are available to provide language assistance, then staff will contact an interpreting vendor who has been contracted with the County to provide services.

### **Document Translation**

The need for assistance in the application process for many Hennepin County programs poses some unique challenges. While the Human Services and Public Health Department and Hennepin County Medical Center all employ staff with the ability to assist in these functions, they are not able to cover all language needs in all locations. While many application forms and critical documents are available in translated format, low literacy rates in some LEP populations, a lack of translated materials in all languages, and a lack of translated information on such topics as program eligibility, income and asset limits present additional challenges to County staff.

The Hennepin County Limited English Proficiency Manager has worked with County departments to identify county-produced forms, brochures and written materials routinely distributed to English speaking individuals. Through a process of prioritization, the Limited English Proficiency Manager and department Limited English Proficiency Coordinators have identified critical and vital documents to be translated. Translated documents are now stored in a document repository that is available to all staff.

Hennepin County also continues to work with the Minnesota Department of Human Services, the Minnesota Department of Health and other state and federal agencies to

identify the availability of translated documents. Copies of all translated documents are made available upon request.

### **Signage**

The Limited English Proficiency Plan also takes into account physical signage and spatial considerations so that interactions between Hennepin County staff and LEP clients can take place in a private and confidential manner. This includes interactions with clients who might be Deaf/Hard of Hearing and/or Blind/Low Vision.

As part of the assessment, the departments of Hennepin County were asked to identify points of contact and entry sites at remote buildings and the Government Center. It is the goal that all entry points have posted signage that informs LEP populations of their right to free interpreter assistance in the fifteen languages. The Limited English Proficiency Manager continues an on-going process of assessing all entry points to ensure appropriate signage is posted by reevaluating access points identified in the initial assessment, as well as determining new points where LEP populations access County services.

This Plan serves as a guide for Hennepin County to plan, develop, and implement a strategy for posting appropriate signage in the fifteen languages identified by DHS in a uniform and consistent manner. The assessment has also allowed Hennepin County to identify other growing LEP populations – such as those who speak Ewe – who access its buildings and services. Hennepin County assesses future needs by conducting yearly estimates of new LEP populations to see if they meet the critical mass numbers as identified by DHS and if new signage in new languages is needed.

It should also be noted that certain departments have taken it upon themselves to initiate creative and innovative ways to provide signage which takes into account colors, international signs, and numbers to help clients find their way around.

### **Privacy Issues**

Some of the departments that employ their own interpreters use walled cubicle spaces to conduct client and/or patient interviews in a private and confidential manner. Other departments have private “intake” rooms where interviews are conducted on a one-to-one basis. Conference calls with clients are usually conducted in meeting rooms, although sometimes this is not the case.

Hennepin County Limited staff will continue to determine appropriate space for client and/or patient interviews. County departments have established their own internal bank of interpreters using telephonic systems. They are also exploring options of both enhanced audio and video-conferencing to help with interpreting services.

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Hennepin County staff – including interpreters, bilingual staff, and contracted interpreters working with clients and/or patients – sign a data privacy oath. Violations of this oath are dealt with strictly and severely. Hennepin County staff who work directly with clients or patients undergo data privacy training to ensure they understand the importance of maintaining confidentiality. Hennepin County will continue to determine dedicated space for staff and clients working with interpreters to conduct interviews in a safe manner that respects the clients’ privacy and confidentiality.

### **Deaf/Hard of Hearing and Blind/Low Vision Clients**

Hennepin County offers its English-speaking clients and/or patients hearing aids and large printed material where possible. Also, American Braille signs are posted next to elevator entrances.

County departments have a staff American Sign Language (ASL) interpreter for all clients and/or patients who are English-speaking and Deaf/Hard of Hearing. To supplement this service, the County has also contracted with ASL interpreter agencies to provide ASL interpretation coverage during busy days, after-hours, weekends, and holidays.

The Hennepin County LEP Coordinators and LEP Manager will explore whether other forms of sign language exist that may be used by the fifteen LEP populations identified by DHS. If such languages exist, Hennepin County will use contracted interpreter agencies to provide this service.

The Plan will also determine if other Braille languages exist, as determined by the DHS guidelines. If such languages are found to exist, the Limited English Proficiency Plan along with Property Services will phase in the posting of these signs in appropriate places across County departments.

### **CONSISTENCY IN THE DELIVERY OF SERVICES**

When Hennepin County representatives were asked to conduct departmental assessments of the needs of LEP clients, many put themselves in the place of the clients and “walked through” the experience. The next few sections address how clients and staff first assess and meet language needs.

#### **Procedures for Documentation**

The Hennepin County LEP Coordinators and LEP Manager continue to train Hennepin County staff on the following procedures and documents to ensure a consistent and efficient delivery of services to individuals in the LEP population:

- **Offer of Interpreter Service (Attachment A)** – All LEP individuals will be informed of their right to free interpreter services or translated documents by

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Hennepin County Staff. The staff member will then document this offer and keep it with the client's records.

- **Check List (Attachment C)** – Hennepin County Staff should refer to this checklist when working with a LEP patient or client to ensure the proper procedures have been followed.

The Hennepin County staff member should:

1. Determine point of contact
2. Offer free interpreter services
3. Understand protocol to obtain live, agency or remote interpreter
4. Determine whether the client needs audio and/or visual aid(s) or an ASL interpreter
5. Obtain name of staff interpreter, contracted agency and interpreter or remote interpreter
6. If a client refuses a free interpreter document the case file that an interpreter was offered and the interpreter was refused. Do not allow friends or family to interpret even if the client insists.

### **Responsibility of Documentation**

The responsibility of documentation lies with the County staff member working closely with the client and/or patient. However, all staff members working as first points of contact should understand the need to determine language needs of members of LEP populations in a timely manner. This will reduce delay, frustration, costs, and possible liability issues.

Training will ensure that staff working across County departments will document the needs of members of LEP populations in a consistent and uniform manner.

Standardization of the methods and forms regarding the offer for free interpretive services alleviates the confusion and delay when working with members of LEP populations.

### **Initiating an Offer for Free Interpreter Services**

The Limited English Proficiency Plan has identified training of staff as an important component of working with LEP populations. Among the subject areas that are offered to County staff is cultural competency training. This training allows staff to become more familiar with the different groups of LEP populations accessing the services of Hennepin County. The initial phases of the training component focus on front line staff that are typically first points of contact for LEP populations.

Free interpreter services are offered in the following situations but are not limited to these events. A LEP client could:

1. Present an “I Speak” card
2. Point to a language on the poster created by DHS that offers free interpretive service in ten languages
3. Be accompanied by a friend who tells the staff that the client needs an interpreter who then hands off the client to the County staff
4. Exhibit confusion or lack of understanding
5. Be accompanied by representatives from Mutual Assistance Associations (MAA) or Community Based Organizations (CBO).

### **Identifying the Need for an Interpreter**

In addition to the methods stated above, County staff continue to be trained to identify clients who might misrepresent their understanding of the English language. All staff members are asked to access an interpreter if they feel that the client does not fully understand what they are trying to communicate. They then use the procedures checklist for documenting the need for an interpreter. This procedure protects both the client and the staff and, ultimately, the County from any potential liability issues.

Another way to ensure that the needs of LEP populations are met is to continue hiring and retaining bilingual and preferably bicultural staff that are able to converse with clients and determine if they need interpreters.

### **Offers to All or Some Groups of Limited English Proficiency Populations**

Using the procedures outlined in the Limited English Proficiency Plan, County staff offer free interpreter services for *all* members of all LEP populations who do not speak or understand English. As stated above, some clients may misrepresent their ability to speak and/or understand English, but in order to protect the client, staff, and County, interpreter services must be offered. It is important to note that a number of countries were colonized by Great Britain, and for this reason, their citizens speak English; however, due to regional differences, dialects, and accents, the English spoken by these clients might not be readily understandable by staff. In some cases, these clients might speak a patois or a Creole which is a language peppered with English words, but technically not a language all by itself and is *not* English. Such a client will be provided an interpreter as long as the staff member and/or the client feels that the presence of one will help facilitate the transaction.

### **The Individual/Client Bill of Rights**

**The Individual/Client Bill of Rights is included with the Limited English Proficiency Plan as (Attachment B).**

### **ASL Guidelines and Standards**

As part of the draft recommendations put forth by the Interpreter Services Subcommittee, the guidelines and standards utilized by ASL interpreters were referred to and adopted as general ethics and competency standards for all interpreters where applicable.

### **Use of Family and Friends as Interpreters**

At no time will family members or friends of the LEP client be utilized to provide interpretive services, even in the event of an emergency. A family member or friend is not competent to act as an interpreter because they may not be proficient enough in both languages, may lack training in interpretation, and/or may not be familiar with specialized program terminology.

## **TRAINING**

An important component of the Limited English Proficiency Plan is the training of Hennepin County staff. The next few sections describe the process that is taken in addressing the issue of training.

### **Training of Staff in Accordance with OCR Guidance**

Hennepin County and their contracted agencies remain committed to providing a full range of services to all individuals who are eligible, regardless of their English language capabilities. Hennepin County has worked extensively on a training component to develop the skills and diversity of their employees. Hennepin County continues to be committed to the training of employees and the effective delivery of services to LEP individuals by implementing the following plan.

### **Distribution of Limited English Proficiency Plan to agency staff and contracted services**

Hennepin County distributes the Limited English Proficiency Plan by making the Plan available on a shared Local Area Network server. Hennepin County has also placed the Plan on its Internet and Intranet web-site for all employees and residents to review.

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The Limited English Proficiency Plan will continue to be posted on the Hennepin County website in order to quickly and effectively disseminate this information to staff. Hennepin County supervisors and managers are responsible for pointing out to staff that the LEP Plan can serve as a useful tool for learning about LEP protocols. However, managers and supervisors always contact their departments LEP Coordinators or the LEP Manager for additional guidance on such matters. This distribution is designed to be a precursor to formal training for staff who have contact with LEP individuals. Paper copies of the Limited English Proficiency Plan are included in each point of contact's "**Limited English Proficiency Action Kit**".

### **Training of Current Staff**

Due to the size and complexity of Hennepin County's workforce, several training options are available.

1. *Formal Training* – This face-to-face training is offered through the Human Resources Department and each department's Staff Development area. This course is designed for management, supervisors and staff who are likely to have contact with LEP individuals. This course covers the basics of the Hennepin County Limited English Proficiency Plan, the obligations of Hennepin County to provide interpretative services, and how to effectively utilize the interpreter and understand the dynamics between the client, provider and interpreter.
2. *Computer Based Training* – Hennepin County offers a computer-based training covering the guidelines for working with an interpreter and is available to all employees who utilize interpreter services in direct client interactions. This training is strongly encouraged for all Hennepin County employees who provide direct services to clients. The training encompasses:
  - The significance of the Hennepin County Limited English Proficiency Plan and associated obligations and protocols;
  - The process for accessing and utilizing interpreters;
  - Guidance for understanding the dynamics of an effective interpreting exchange among client, provider, and interpreter.
3. *Informal Training* – All other individuals who are not likely to have contact with LEP persons are required to receive informal training covering the basics of the Hennepin County Limited English Proficiency Plan and the obligations of the plan. This training is conducted by his/her unit supervisor or by a trainer if requested.

### **Training of New Staff**

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The Hennepin County Human Resources Department and Limited English Proficiency Manager works with the respective training departments in order to orient new employees and volunteers to the Hennepin County Limited English Proficiency Plan. These sessions are designed with the assumption that all newly hired individuals are likely to have contact with LEP individuals. Every effort is made to ensure that these training sessions are conducted in the first few weeks of employment as the employee goes through the general County orientation process.

### **Continuing Education**

The Limited English Proficiency manager works with Human Resources on an as-needed basis to provide continuing education to Hennepin County staff with regard to the Limited English Proficiency Plan.

### **Trainers**

Each area or Department Limited English Proficiency Coordinator works with the Limited English Proficiency Manager to determine the best method of delivering Limited English Proficiency training to his/her staff. This process may include identifying trainers within his/her department who are willing serve as Limited English Proficiency Trainers. Alternatively, the Coordinator may serve as a trainer within his/her department. Human Resources continues to conduct new employee training sessions for all County employees and the training of Interpreter/Bilingual staff. Human Resources also continues to provide training assistance to departments that have limited training resources.

### **Schedule and Location**

The schedules of training sessions are determined by each department or area. The training sessions are conducted in various locations and times for the convenience of employees and to minimize the disruption of work.

### **Registry of Training**

All Hennepin County employees' attendance to the various classes is recorded in the Hennepin County training database known as "Personal Registrar." All volunteers and other individuals who do not have an employee number have their attendance tracked by their supervisors. Tracking is conducted by Human Resources via the Personal Registrar and the Learning Management System.

### **Contracted Vendors**

All Hennepin County Health and Human Services Department contracted vendors receive a written copy of Hennepin County's Limited English Proficiency Plan. Language to ensure compliance with this plan is written into new contracts. Contracts already in effect may be re-negotiated in order to add Limited English Proficiency compliance language. Vendors are responsible to provide training for their employees, unless Hennepin County agrees otherwise. Individuals/providers who are involved in any type of Child Care Licensing activity are acting as independent businesses and as such are not eligible for LEP services.

### **VIGILANT MONITORING**

A necessary and crucial part of the Limited English Proficiency Plan is monitoring, assessment, and evaluation. For this reason, vigilant monitoring procedures are in place to help the Limited English Proficiency Manager assess and evaluate the success of the plan. The next few sections address this topic.

### **Limited English Proficiency Manager**

Hennepin County has identified one person who will serve as the Limited English Proficiency Manager for Hennepin County departments. The primary responsibilities of this individual include:

- Implement the Limited English Proficiency Plan across the Human Services and Public Health Department and at the Hennepin County Medical Center.
- Assist departments in identifying critical county-generated documents in order to establish prioritization for translations.
- Develop tools for evaluating effectiveness of the Hennepin County Limited English Proficiency Plan, compliance with Limited English Proficiency protocol for accessing interpretive services, and obtaining client and community input regarding the overall effectiveness of the Limited English Proficiency Plan.
- Work with the Office of Budget and Finance to identify resource needs within County departments.
- Serve as the central point of contact to address compliance concerns from LEP populations residing in Hennepin County.
- Assist with the implementation of universal signage strategies across Hennepin County departments.
- Conduct annual monitoring of all Hennepin County access points where LEP populations are likely to be encountered to ensure adherence to Limited English Proficiency Plan and the Limited English Proficiency protocols for securing language services.

### **Evaluation of the Limited English Proficiency Plan**

On an as needed basis, the Limited English Proficiency Manager coordinates with department management to review the Limited English Proficiency Plan for effectiveness, both on a departmental basis and a countywide basis. This review includes:

- An assessment of numbers of persons with Limited English Proficiency in Hennepin County. This information is collected through the assistance of the State Department of Human Services and from other community agencies (i.e. school systems).
- An assessment of current language needs of applicants and clients with Limited English Proficiency. Case files will be reviewed to determine if the client needs an interpreter and/or translated materials to communicate effectively. Files found to be lacking are updated with client's language preference. Questionable situations can be resolved by clarifying the client's language needs at recertification.
- A determination of whether existing assistance is meeting the needs of applicants and clients with Limited English Proficiency.
- An assessment of whether staff members understand agency and County Limited English Proficiency policies and procedures and how to carry them out. Assessment of the language resources and arrangements for those resources to ensure that they are current and accessible will also occur.
- Feedback from non-English or LEP communities in the service delivery area, including applicants and clients, as well as community organizations and advocacy groups working with non-English or LEP communities.

To ensure continual improvement in the area of LEP population client service, the County developed a formal Customer Concern process to allow clients the opportunity to voice their suggestions and concerns. The process has two distinct elements: A suggestion pathway and a complaint pathway.

### **A Suggestion Pathway**

The LEP Coordinators and LEP Manager will continue to develop a suggestion pathway in order to provide any person requesting service from the County with the opportunity to suggest general process and quality improvement corrections. The suggestion process will include a method for determining which suggestions were of a non-Limited English Proficiency nature. Under this process, any client, patient, applicant, customer, or agency will be afforded the opportunity to comment on the service provided and offer solutions. Suggestions identified as non-Limited English Proficiency issues will be forwarded directly to the supervisor of the area in question, with an expectation that Management considers the suggestion, implement corrective action, and reply to the individual (if requested) in a timely manner.

Suggestions identified as LEP client service issues will be forwarded to the Limited English Proficiency Manager, who will then follow up with the unit manager and individual.

### **A Complaint Pathway**

There is a complaint process in place that is applicable to all areas within Hennepin County and accessible to LEP clients from any language/ethnic/cultural group. Customers are able to voice concerns regarding specific incidents of poor customer service, including the quality and timeliness of interpreter services. Through this pathway, complaints of a non-Limited English Proficiency nature are forwarded to the respective County department management, with the expectation that an inquiry will be conducted in a timely manner. If any of the issues involve Federal/State protected classes, and a possible violation of the Hennepin County Diversity and Non-Discrimination Policy, management will consult with the Hennepin County Human Resources Department EEO/AA Director for guidance, and possible commencement of a formal investigation may follow.

Complaints concerning County interpreter services are forwarded directly to the Limited English Proficiency Manager. The Limited English Proficiency Manager reviews the complaint, conducts interviews with all parties, recommends a course of corrective action, and reports the findings to the Limited English Proficiency program management and County EEO/AA Director. Corrective action may include additional training for staff, staff reassignment, or process improvement strategies.

The LEP Manager and LEP Coordinators have developed a pathway in which customer concerns can be filed. A number of different methods are available including:

- **A formal, written, Customer Concern Form, available in various locations throughout the County** – The customer may return the form to the County staff member who served him/her with the expectation that the form will be reviewed by the department or area Limited English Proficiency Coordinator who will address complaints or suggestions. This evaluation form is available as **Attachment E**. Additionally, the forms could eventually be made available online and at neighborhood agencies and community group locations throughout the County.

### **Tracking and Reporting**

Using data gathered from the Customer Concern Program, the Limited English Proficiency Manager continues to track the occurrences and look for trends. Serious, negative trends in a County department will trigger an immediate report to the

## Hennepin County Limited English Proficiency Plan

department's management for their review and action. Concerns identified on a countywide basis will be reported to County Administration for their review and possible action. As requested, the Limited English Proficiency Manager will produce and present reports to County leadership for their review and consideration.

Attachment A

**Offer of Free Interpreter Services**

All Limited English Proficiency clients must be informed of their right to free language assistance including interpreter services and translated documents. This form can be kept in the client’s records for future reference. County staff should never encourage, suggest, or require a Limited English Proficiency client to use friends or family as interpreters. At no time will anyone under the age of 18 be utilized to provide interpreter services.

<b>Department or Area:</b>	<b>Name of Staff Person:</b>	
<b>Name of Client(s):</b>	<b>Date of Visit:</b>	
<b>Reason for Visit:</b>		

Is language assistance necessary? (please circle) **YES NO**

If the client does not need language assistance because they have brought their own interpreter or feel they do not need one, please have them fill out the **Waiver of Right to Free Interpreter Services**. If the client needs language assistance continue below.

Language assistance needed (please circle):

- Amharic    Arabic    Bosnian    Hmong    Khmer    Lao**  
**Oromo    Russian    Somali    Spanish    Vietnamese    Other \_\_\_\_\_**

Did you contact a:

**Bilingual Staff Member**  
**Contracted Interpreter**

**Staff Interpreter**  
**Remote Interpreter Agency**

<b>Name of Bilingual Staff Member if used:</b>	<b>Name of Staff Interpreter if used:</b>
<b>Name of Contracted Agency if used:</b>	<b>Name of Contracted Interpreter:</b>
<b>Name of Remote Agency if used:</b>	<b>Name of Remote Interpreter:</b>
<b>Duration of Interpreted Session:</b>	

Attachment B

## **The Limited English Proficiency Individual Bill of Rights**

Every Limited English Proficiency Individual has the following rights:

- I. To meaningful access of services through the provision of timely, effective language assistance free of charge.
- II. To be treated with courtesy and respect and in a manner that respects the person's dignity and privacy and promotes independence.
- III. To be treated in a manner which is sensitive to his/her needs and preferences, and ethnic, spiritual, linguistic, familial and cultural factors.
- IV. To be free from discrimination, abuse, and harassment by the service provider or agency.
- V. To have critical information about the services provided and who will be providing the service communicated in their language – either written, orally, or visually.
- VI. To participate with the service provider or agency in the assessment of needs, development of a plan of service, reassessment, evaluation and revision of a plan of service with the aid of a competent interpreter or bilingual staff member.
- VII. To be informed in their language of the possible outcomes by accepting or refusing services.
- VIII. To raise concerns about or recommend changes to the service provided without fear of interference, coercion, discrimination or reprisal.
- IX. To be informed in their language of laws, rules and policies affecting the operation of the service provider.
- X. To be informed in their language of their rights and responsibilities when utilizing services.
- XI. To be informed in their language of the procedures for initiating compliance concerns about the service provider or agency.
- XII. To have his/her records and interactions with the service provider or agency kept confidential in accordance with the law.

Attachment C

## Limited English Proficiency Checklist

When working with a member from a Limited English Proficiency population **always** check to see if the following procedures have been followed:

- Determine point of contact.
- Offer free interpreter services.
- Understand protocol to obtain live, agency, or remote interpreter.
- Check if client needs audio and/or visual aid or a sign interpreter.
- Always obtain name of staff interpreter, contracted agency, and interpreter (or remote interpreter).
- If offer is rejected, document this refusal.
- Make sure client and his/her interpreter sign Authorization/Waiver Form.

Attachment D

**Countywide Standards for Any\* Person Doing Interpreting in the Delivery of County Services**

ETHICAL STANDARDS	INTERPRETING COMPETENCY STANDARDS	GUIDELINES FOR WORKING WITH AN INTERPRETER
<ul style="list-style-type: none"> <li>• <b>Confidentiality:</b> All Information divulged by anyone in any interpreted exchange is strictly confidential. The person doing the interpreting may reveal information only IF required to by current law or rule.</li> <li>• <b>Accuracy:</b> Any person doing the interpreting is expected to transmit the content and spirit of the original language into the other language without omitting, modifying, condensing or adding. IF there are problems or misunderstandings with interpreting any information, the person interpreting must advise everyone involved.</li> <li>• <b>Impartiality:</b> Any person doing interpreting refrains from interjecting personal opinions or biases into the exchange. They will withdraw from assignments or situations where personal opinions or biases may affect their impartiality.</li> <li>• <b>Conflict of Interest:</b> Any person doing interpreting shall inform all parties if s/he has a real or perceived conflict of interest and s/he shall remove her/him self from the interpreting situation. S/he does not need to disclose the nature of the conflict of interest.</li> <li>• <b>Maintains professional distance:</b> Any person doing interpreting understands the boundaries of her/his role and refrains from becoming personally involved in the situation.</li> <li>• <b>Knows Own Limits:</b> Any person doing interpreting declines to interpret beyond her/his training, level of experience and skills.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Self Introduction:</b> Any person doing interpreting will introduce him/her self to all parties involved and explain his/her role.</li> <li>• <b>Self Positioning:</b> Any person doing interpreting will position him/her self to best facilitate communication amongst all parties, unless otherwise directed. Speak "loud &amp; clear" so that all parties can hear you well.</li> <li>• <b>Communicate all parties' content &amp; feelings:</b> Any person doing interpreting shall communicate the content and emotions expressed by all parties.</li> <li>• <b>Speak in First Person:</b> Any person doing interpreting shall speak in the first Person when communicating for both parties. That is, use "I" in reference to the speaker rather than "he/she said".</li> <li>• <b>Speak in Appropriate Mode:</b> Any person doing interpreting shall use consecutive or simultaneous interpretation mode as appropriate to the situation.</li> <li>• <b>Understand Content:</b> Any person doing interpreting will ensure that s/he understands the message to be transmitted by seeking clarification, as needed, from either or all parties.</li> <li>• <b>Remains Neutral:</b> Any person doing interpreting must remain neutral by reminding all parties of her/his ethical obligations to be impartial, to be accurate, to maintain professional distance and avoid any conflict of interest.</li> <li>• <b>Self-Monitoring &amp; Correction:</b> Any person doing interpreting checks the accuracy of his/her own interpretation. S/he identifies and corrects any misinterpretation for all parties.</li> <li>• <b>Cultural Brokering:</b> Any person doing interpreting shares relevant cultural information with all parties involved and assists all speakers in reaching a mutual understanding.</li> <li>• <b>Manage the Flow of Communication:</b> Any person doing interpreting will manage the flow/pace of communication to preserve the accuracy and completeness of all parties' communications.</li> <li>• <b>Complete Appropriate Documentation:</b> Any person doing interpreting will complete appropriate documentation as required.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Speak Directly to the Limited English Proficiency (LEP) person,</b> not to the person doing the interpreting.</li> <li>• <b>Don't say anything that you do not want interpreted.</b></li> <li>• <b>Use words, not just gestures, to convey your meaning.</b></li> <li>• <b>Speak slowly, clearly and in a normal tone of voice.</b></li> <li>• <b>Use simple vocabulary to express your meaning.</b></li> <li>• <b>Explain jargon and technical terms when necessary.</b></li> <li>• <b>Speak in short simple sentences, pausing to permit the interpretation.</b></li> <li>• <b>Ask one question at a time.</b></li> <li>• <b>Allow the person doing the interpreting to stop you and seek clarification when necessary.</b></li> <li>• <b>Expect the person doing the interpreting to take notes if things get complicated.</b></li> <li>• <b>Be prepared to repeat yourself in different words if your message is not understood.</b></li> <li>• <b>IF you suspect that your message is not fully understood, by the person doing the interpreting, double check to see if s/he understands your message.</b></li> <li>• <b>IF you suspect that your message is not fully understood by the Limited English Proficiency (LEP) individual, double check to see if s/he understands your message; e.g. "Tell me what you understand".</b></li> <li>• <b>When using bilingual staff for interpreting, DO NOT ASK them to perform functions related to their regular job.</b></li> </ul>

\*The "Any Person" to whom these standards would apply includes: Bilingual Staff, Staff Interpreters, Contracted Interpreters, Bilingual Backup Staff, Telephone Interpreter Services, and Volunteers.

# Hennepin County Limited English Proficiency Plan

## Attachment E

### PLEASE COMPLETE THIS FORM ABOUT YOUR COUNTY EXPERIENCE

Hennepin County wants to provide the best possible service to Limited English Proficiency Persons. Please help us to keep improving by telling us about your experience with the County system.

**1. Please rate the following (Check the Number):**

**1 = Poor          2 = Fair          3 = Good          4 = Excellent**

**A. County personnel were courteous and respectful.**

\_\_1          \_\_2          \_\_3          \_\_4

**B. I was informed of my right to free interpreter services promptly and efficiently.**

\_\_1          \_\_2          \_\_3          \_\_4

**C. The language assistance (interpreter or translated documents) was provided in a timely manner.**

\_\_1          \_\_2          \_\_3          \_\_4

**D. The interpreter service provided was appropriate and helpful during my interaction with the County.**

\_\_1          \_\_2          \_\_3          \_\_4

**E. The translated documents (if used) were appropriate and useful.**

\_\_1          \_\_2          \_\_3          \_\_4

**F. My County business was handled promptly and efficiently.**

\_\_1          \_\_2          \_\_3          \_\_4

**2. Do you have any feedback or complaints about the languages assistance services that the County provided for you? (This information will be used to help improve our language assistance services):**

When completed, this form should be sent or faxed to the Department or Area Limited English Proficiency Coordinator who will review it and take any steps necessary to address complaints or concerns in a continuing effort to improve the delivery of County services to Limited English Proficiency individuals.

**Hennepin County  
Contracted Interpreting & Translation Vendors  
2018-2022**

**All in One Translation Agency, LLC**

1109 158<sup>th</sup> St. W.  
Burnsville, MN 55306

**Arch Language Network, Inc.**

125 Little Canada Rd W. Suite 200  
Little Canada, MN 55117

**A-Z Friendly Languages, Inc.**

3818 Brookdale Circle N.  
Brooklyn Park, MN 55443

**Global Language Connections**

3618 East Lake St.  
Minneapolis, MN 55404

**Kim Tong Translation Services**

2994 Rice St.  
Little Canada, MN 55113

**Language Line Solutions**

One Lower Ragsdale Dr., Bldg. 2  
Monterey, CA 93940

**Middle English Interpreting**

2125 Emerson Ave S.  
Minneapolis, MN 55405

**Surad Interpreting & Translation Co.**

2027 Nicollet Ave. S.  
Minneapolis, MN 55404

**University Language Center, Inc**

4445 W. 77<sup>th</sup> St., Ste 110  
Minneapolis, MN 55435