

Care Lodge Domestic Violence Shelter, Inc. Language Access Plan

Effective Dates: January 2019-December 2020

Section 1: Overview and Context

A. Connection to Mission

Care Lodge recognizes that providing meaningful language access is a critical function of ensuring safety and security for all survivors of sexual and domestic violence.

B. Language Access Needs:

Care Lodge has identified that 13 languages are spoken in our community. The Languages are Spanish, Gujarati, African, French, German, Japanese, Scandinavian, Vietnamese, Tagalog, Yiddish, Native American, Arabic, Indo-European. The analysis of the general population and population served by our agency revealed that we need to build immediate capacity to provide meaningful access in each of these languages.

Additional strategies for building relationships with and increasing our capacity to serve 1.23% speaking community members will be outlined in this plan.

C. Capacity-Building:

Care Lodge Domestic Violence Shelter offers the following services: Red Flags, Shelter, Children’s Program, Non-Residential Services, Transitional Housing Assistance Program (TAP), Case Management, Court Advocacy and Support, Counseling – individual and group, and Domestic Abuse Protection Order Assistance (DAPO). We have identified several strategies for creating meaningful access to these services:

Service	Language Access Strategies
24-Hour Crisis Line	<i>Train all staff and volunteers on connecting to Language Line services.</i>
Case Management for Survivors	<i>Categories to Intake Form to improve screening and evaluation</i>

Implementation of these strategies will take place as follows:

- January 2019: Place notice of availability of interpreters at all entrances. Place “I Speak” posters near every phone.*
- Feb – March 2019: Train all staff on language access plan, expectations and resources available for providing language access.*
- March-April 2019: Enhance intake protocol to screen for and document language access needs of survivors.*

Progress toward greater language access will be measured by:

- Staff training evaluations will assess for comprehension and ability to implement language access strategies. Target: 95% staff will be able to successfully implement language access strategies by May 31, 2019*

- *New intake categories for “Preferred Language” will be implemented by May 31, 2019. Data input begins in April 2019, first quarter analysis of language access needs completed by July 31, 2019. Goal of 80% completion of the new category on the intake in the first quarter.]*

D. Fund Development Needs:

Long-term funding needs include: Hiring plan for bilingual advocates, development of multi-lingual video tour of shelter and shelter guidelines pamphlet.

Section 2: Policies

General Policy Statement:

1. *Care Lodge Domestic Violence Shelter, Inc., will never turn anyone away because they do not speak English. Furthermore, Care Lodge Domestic Violence Shelter, Inc., will work to improve our capacity to provide meaningful access to individuals with limited English proficiency every year.*
2. *Care Lodge Domestic Violence Shelter, Inc., primary focus is to provide support and safety to victims of domestic violence and sexual assault through direct services. Therefore, Care Lodge Domestic Violence Shelter, Inc., will develop and secure sustainable language resources as needed in both oral and written form so that no victim will be denied access to information or services.¹*

It is the policy of this agency to provide timely meaningful access for persons with LEP to all agency programs and activities. All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services to them.

3. *Care Lodge Domestic Violence Shelter, Inc., recognizes that many low-income individuals in its service area have limited English proficiency. Care Lodge’s goal is, whenever practicable, to offer and provide the same high-quality service to all survivors, regardless of their language and communication abilities. The Community Service Outreach Coordinator will be in charge of implementing Care Lodge’s policy for assisting survivors with limited English proficiency (“LEP Policy”).*

A. Purpose and Authority:

1. *The purpose of this plan is to ensure that Care Lodge Domestic Violence Shelter, Inc., provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. Care Lodge Domestic Violence Shelter, Inc., is committed to this plan as the appropriate response to meeting survivors’ needs. This plan is consistent with federal requirements. All agencies that receive federal financial assistance from the U.S. Department of Health and Human Services (HHS) must take adequate steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow them meaningful access to services, free of charge.²*
2. *The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for agency personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to the success of our mission to work together to end abuse within the community.*

Section 3: Practices

A. Language Assistance Measures:

1. *Care Lodge Domestic Violence Shelter, Inc., expects staff to familiarize themselves with the language access practices and resources outlined below. Staff should work directly with supervisors with questions, concerns, or to report difficulties in accessing the indicated resources.*

Point of Contact	Expectations of Staff	Tools and Resources
Crisis Line	Identify language spoken. Connect with bilingual staff, interpreter, etc.	Language Line, Bilingual Advocates, etc.
One-on-one Participant Meetings (Intake, Case Planning, etc.)	Ensure that an interpreter is available. Follow best practices for ensuring safety for participant by securing the name of the interpreter in advance, requiring an interpreter confidentiality agreement, etc.	In-Person Interpreting Agency Interpreter Confidentiality Agreement
Ongoing Shelter Services	Notify participant of the available of language services on an ongoing basis, immediately provide access to the language line when requested.	Language Line Language-specific shelter tour video
Community-Based Services	Meet with other agencies and provide information about LEP plan and resources so that they may assist in informing LEP individuals of language assistance services available.	Flyers, I Speak Cards, brochures
Providing Referrals	Call the referral source and identify a point of contact with adequate language capacity. Connect the participant with the point of contact. Request and review the LEP Plan for the referral source (courts, medical offices, other DV services, etc.).	In-Person Interpreting Agency Language Line Language access cards
Community Events	Identify language spoken. Connect with language line to assess safety concerns and requests.	I Speak Cards Language line

Support Groups	Arrange for an interpreter to be present at every support group during the survivor's stay.	In-Person Interpreting Agency
Written materials	Vital documents are available in Spanish, Arabic and Mandarin. Vital documents are to be reviewed with the support of an interpreter during intake.	Additional translations can be arranged through selected translation agency.

2. *Care Lodge Domestic Violence Shelter, Inc., is committed to ensuring quality services to all survivors and toward that goal we have developed a plan to provide meaningful access to our services for survivors with LEP through bilingual advocates, and when needed we will provide in-person interpreter services via in-person or over-the-phone interpretation.³*
3. *Care Lodge Domestic Violence Shelter, Inc., is committed to assuring clear, confidential, two-way communications with all survivors. As part of this commitment Care Lodge Domestic Violence Shelter, Inc will provide trained and competent interpreters, whenever oral communication is needed. This service will be provided at no charge to the survivor. Care Lodge Domestic Violence Shelter, Inc., preferred means of achieving this goal will be to employ case handlers and support staff who are fluent in the major languages spoken by survivors in our community.*

When Care Lodge Domestic Violence Shelter, Inc., staff members who are working directly with a survivor are not fluent in the survivor's language, Care Lodge Domestic Violence Shelter, Inc., will use the services of a local interpreter service, which uses trained and tested interpreters. To the extent possible, the interpretation will be conducted in person but, if necessary, it may be conducted by phone. If no local interpreter service is available, Care Lodge Domestic Violence Shelter, Inc., will use Language Line or a similar over-the-phone interpreter service.

B. Notification of Language Assistance Services:

1. *Posters notifying survivors with LEP of their language service rights will be developed and displayed in areas where intakes are conducted. These posters will contain a simple message - such as 'Free Interpreter services are available. Please ask for assistance.' And will be in English as well as the principle languages spoken in the service area. Flyers will also be developed and made available throughout the program and community. Staff will also have access to the Care Lodge Domestic Violence Shelter, Inc., Language Access plan, and will have 'I-Speak Cards'. These are laminated business-sized cards that say in both English and the principal languages 'I need a (appropriate language) interpreter.*
2. *In all of its intake areas and on its website, Care Lodge Domestic Violence Shelter, Inc., will post and maintain clear and readable signs in the languages most prevalent in our community notifying survivors that free translation and interpretation services are available to them.*

All Care Lodge Domestic Violence Shelter, Inc., intake staff will have "I speak" cards in the languages most prevalent in our community.

C. Staff Compliance:

1. *Care Lodge Domestic Violence Shelter, Inc., staff will initiate an offer for language assistance to constituents who have difficulty communicating in English.*
2. *All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services for all services offered.*

D. Additional Language Access Policies:

Bilingual Staff Policy

1. *Care Lodge Domestic Violence Shelter, Inc., has a preference for hiring bilingual/bicultural staff members whenever possible to work directly with individuals with limited English proficiency. Bilingual/bicultural staff qualify for a salary differential based on language proficiency, cultural knowledge, and ability to effectively support individuals with limited English proficiency. Additionally, bilingual staff are not and should not be used as interpreters for work inside the organization or for other organizations.*
2. *Care Lodge Domestic Violence Shelter, Inc., shall consider second language proficiency, in a language commonly spoken by Care Lodge Domestic Violence Shelter, Inc., clients or potential clients, as a preferred quality when hiring new staff. Care Lodge Domestic Violence Shelter, Inc., employee recruiting materials will clearly state that second language proficiency will be viewed favorably in Care Lodge Domestic Violence Shelter, Inc., hiring decisions. Care Lodge Domestic Violence Shelter, Inc., will send notice of all job openings to diverse community-based organizations in our area.*

Children as Interpreters Policy

1. *Care Lodge Domestic Violence Shelter, Inc., will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.*
2. *Child interpreters prohibited. The use of minor children or other survivors to interpret is prohibited.*

F. Training:

Staff Training

1. *Care Lodge Domestic Violence Shelter, Inc., will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures. One staff may be appointed to monitor implementation of the plan and conduct staff training as needed.*
 - *All staff providing technical assistance, training or receiving in-bound calls will received annual LEP training, or training upon employment, and then annually.*
 - *LEP plan information will be incorporated into the employee handbook.*
 - *LEP training will include information on the following topics:*
 - *Legal obligation to provide language assistance;*
 - *LEP plan and procedures;*
 - *Responding to LEP individuals;*
 - *Obtaining interpreters (in-person and over-the-phone);*
 - *Using and working with interpreters (in-person and over-the-phone);*

- *Translating procedures; and*
 - *Documenting language requests*
2. *Care Lodge Domestic Violence Shelter, Inc., will circulate this policy to all staff within 10 days after its adoption. Every two years, Care Lodge Domestic Violence Shelter, Inc., will circulate the revised policy to all staff after its adoption.*

Within nine months of the adoption of this policy, Care Lodge Domestic Violence Shelter, Inc., will provide cultural competency training, including training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with survivors. All new staff members will receive cultural competency training within six months of the beginning of their employment with Care Lodge Domestic Violence Shelter, Inc., After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

3. *In order to establish meaningful access to information and services for survivors with LEP, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained on Care Lodge Domestic Violence Shelter, Inc., LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with survivors with LEP. Management staff will be included in this training, even if they do not interact regularly with survivors with LEP, to ensure that they fully understand the plan, so they can reinforce its importance and ensure its implementation by staff.*

Section 4: Monitoring and Staff Responsible for Monitoring

Plan to Monitor Effectiveness:

1. *Care Lodge Domestic Violence Shelter, Inc., will conduct an annual evaluation of its LEP plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving survivors with LEP. The appointed staff will lead the evaluation with the assistance of other staff. The evaluation will include the following:*
 - a. *Assessment of the number of persons with LEP in our services area*
 - b. *Assessment of the number and types of language requests during the past year: how many were met and with which strategies, how many were not met and why.*
 - c. *Assessment of whether survivors with LEP are satisfied with existing language assistance services and that the services are meeting their needs*
 - d. *Assessment of whether staff members understand the LEP plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and still accessible*
2. *Care Lodge Domestic Violence Shelter, Inc., intake personnel will record each person's language of choice on the intake sheet. If the individual has limited English proficiency, the person's language of choice will be clearly marked on the file. Care Lodge Domestic Violence Shelter, Inc., case management system will track the number of individuals that Care Lodge Domestic Violence Shelter, Inc., accepts and rejects by the person's language of choice. This information, broken down by office and team will be considered as part of the annual LEP Policy review.*
3. *Care Lodge Domestic Violence Shelter, Inc., will monitor changing population levels and the language needs of individuals with LEP in the region. An annual review of this language access plan will coincide with the annual evaluation of the program. Evaluation results and recommended changes will be*

shared with Care Lodge Domestic Violence Shelter, Inc., (Board of Directors of Language Access Committee). The Language Access Coordinator will also keep a record of any language access services provided and will make this information available during the annual review process. In connection with updates to this Language Access Plan, Care Lodge Domestic Violence Shelter, Inc., may use some of the following tools to conduct further assessment:

- a. Conduct surveys or focus groups
- b. Develop an evaluation process to assess LEP service provision
- c. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

Implementation Calendar

<i>Language Access Strategy</i>	<i>Implementation Timeline</i>	<i>Person Responsible</i>
<i>Train all staff and volunteers on connecting to Language Line services.</i>	<i>Target: 95% staff will be able to successfully implement language access strategies by March 31</i>	<i>Management Team and Individual Supervisors</i>
<i>Categories to Intake Form to improve screening and evaluation</i>	<i>New intake categories for “Preferred Language” will be implemented by March 31. Data input begins in April, first quarter analysis of language access needs completed by July 15. Goal of 80% completion of the new category on the intake in the first quarter.]</i>	<i>Advocacy Manager</i>

Section 5: Community Outreach and Collaboration

1. Care Lodge Domestic Violence Shelter, Inc., will identify the primary sources through which survivors with LEP are referred to our services, and culturally-based organizations that serve individuals with LEP in our community. Care Lodge Domestic Violence Shelter, Inc., will work to develop collaborative relationships with these organizations to ensure more seamless access to services, accountability to our own language access policies, and greater access to survivors with LEP.
2. Care Lodge Domestic Violence Shelter, Inc., will share its LEP Policy and the documents and knowledge it develops in regard to LEP resources with the other services organizations in our area, namely Multi-County Community Service, Wesley House Community Center, Meridian Housing Authority and any other not-for-profit organization that requests the information.

Section 6: Definitions

Language access: the rights of individuals with Limited English Proficiency (LEP) to receive meaningful access to federally funded state and Federal programs

Limited English Proficient (LEP): refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English

Interpretation: involves conveying information orally from one language to another (e.g. interpreting during an interview)

Translation: involves conveying information in writing from one language to another (e.g. translating documents)

Vital documents or information are those that are critical for accessing federally funded services or benefits or are documents required by law. For the purposes of Care Lodge Domestic Violence Shelter, Inc. services to survivors and other constituents the following are deemed vital documents (Examples may include):

1. Any and all sexual and domestic violence or related brochures generated by Care Lodge Domestic Violence Shelter, Inc., for use by survivors. Community education materials generated by Care Lodge Domestic Violence Shelter, Inc., for distribution
2. Crisis information or referral information to area resources
3. Intake forms, confidentiality waivers, etc.

G. Other Helpful Resources

Section 7: Language Interpreting Services

- 24/7 Voiance Client Support
- 1-800-481-3289
- Support@voiance.com
- 24-hr help line: 651.772.1611