

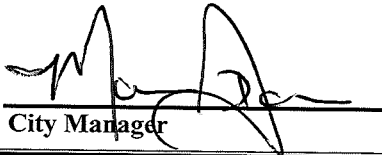


Subject/Title
Language Access Policy

Date Effective
November 30, 2020

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Code Number
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City Manager

City Manager's Office- HNS
Responsible Department

PURPOSE

The City of Charlotte is committed to making services and programs accessible to all people, including those with Limited English Proficiency (LEP). The Language Access Policy (LAP) defines the actions needed to ensure that persons with LEP have meaningful access to services, programs, and activities offered by the City of Charlotte. This policy ensures compliance with Title VI of the Civil Rights Act of 1964, other applicable federal and state laws, and the implementing regulations of these laws with respect to LEP individuals. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color, or national origin by any entity receiving federal financial assistance.

SCOPE

This policy will apply to departments, programs, and services provided by the City of Charlotte.

POLICY

The city is committed to delivering services to all residents regardless of their English language ability. All departments will designate a Language Access Liaison to coordinate the implementation of this policy in consultation with the Office of Equity, Mobility, and Immigrant Integration's Language Access Coordinator. Each department will be responsible for providing translation and interpretation services for department programs, ensuring employees are trained on the city's interpretation services, utilizing multilingual employees appropriately, and obtaining feedback from residents. Departments will also work with the Language Access Coordinator to develop an annual Language Access Strategy, which will include an assessment of the department's language access needs, a summary of the department's progress towards addressing those needs, and a plan for addressing any unmet needs. This strategy will be evaluated and updated annually.

Compliance with the policy will be monitored by the Office of Equity, Mobility, and Immigrant Integration. The standard operating procedure for language access will be available online as a resource to all employees.

Administrative methods or procedures that intentionally subject individuals to discrimination or prevent access to services are prohibited.

I. TARGET LANGUAGES

Title VI of the Civil Rights Act requires programs that receive federal funding to readily provide meaningful access to LEP populations who speak a primary language other than English and have limited English proficiency. The Language Access Coordinator will use the demographics of LEP populations captured in the American Community Survey and other sources to determine target languages for whom city departments shall prioritize language access services. The Coordinator is responsible for maintaining updated information regarding Charlotte demographics.

II. LANGUAGE ACCESS LIAISONS

Each department director will designate a Language Access Liaison to be responsible for the department's language access implementation and coordination. Language Access Liaisons will meet annually with the Language Access Coordinator to review the language access needs of each department and will collaborate with the Language Access Coordinator to develop the department's Language Access Strategy. Language Access Liaisons will also coordinate trainings to ensure that department employees who regularly interact with the public are knowledgeable of the interpretation and translation services the city has available for LEP individuals.

III. LANGUAGE ACCESS STRATEGY

Each department's Language Access Liaison will submit an annual Language Access Strategy to the Language Access Coordinator. The Language Access Liaison will consult with the Language Access Coordinator as needed in preparing the strategy. The Language Access Coordinator is ultimately responsible for ensuring that strategies meet the city's language access needs and shall work with Language Access Liaisons as needed to improve departments' strategies.

Each Language Access Strategy shall include:

1. An assessment of the department's interpretation and translation needs, which shall include a list of department documents that are vital to delivering services (vital documents) and an overview of the ways in which department employees may interact with LEP populations;
2. A report on the department's progress towards meeting the interpretation and translation needs, which shall include the number of vital documents the department has translated to target languages, a listing of the department's multilingual employees, and a summary of the department's past efforts to train employees on implementing interpretation and translation services; and
3. A plan for meeting unmet needs, which shall include a timeline for translating any untranslated vital documents to target languages, a process for ensuring that translated documents are updated concurrently with English language documents, and a description of the department's ongoing efforts to train employees on best practices for providing verbal language assistance, preparing documents for professional translation, and incorporating interpretation services in meetings and events.

IV. CITY WEBPAGE ACCESSIBILITY

The Language Access Coordinator will consult with the appropriate city departments to ensure that the city website provides a web translation tool with prominent placement on all external city webpages. To enable the web translation tool to function most effectively, Language Access Liaisons will encourage and promote the use of plain language in department documents and webpages. The Language Access Coordinator will also coordinate with Language Access Liaisons and webpage managers to ensure that vital documents accessible on external city web pages are available in target languages as well as English.

V. DOCUMENT ACCESSIBILITY

The city shall provide free translations of documents that are essential for meaningful access to city programs and services, focusing on translating into target languages. A LEP individual may request a document to be translated for any needed language. For quality translations, use plain language and have translations performed by professional translator. The Language Access Coordinator will provide Language Access Liaisons with best practices to ensure quality translations and accessibility to documents.

VI. INTERPRETATION SERVICES

The city shall provide free interpretation services to LEP individuals who interact with a city department. Interpretation services may be provided by bilingual city employees or a contracted in-person or over-the-phone interpretation service provider. A LEP individual may request interpretation services, or a city employee may determine that interpretation services are needed. Individuals who are provided interpretation services should always be informed that the services are provided free of charge. LEP individuals may utilize their own interpreter but are not required to do so.

City employees participating in the city's bilingual pay incentive program may be requested to serve as language assistants and provide verbal language services. The Bilingual Services Pay Policy (HR 34) covers the selection, evaluation, compensation, and role of employees who receive bilingual pay incentives. Bilingual employees who are not participating in the city's bilingual pay incentive program may also occasionally serve as language assistants at the discretion of the employee and their supervisor. Should interpretation services be needed, and no city employee or staff member be able to provide such services, a certified interpreter will be contacted. The city contracts with in-person and over-the-phone interpretation providers.

The city will provide residents with information on the public's rights to free language assistance through routinely distributed outreach materials. Multi-language identification cards will be provided to designated employees who regularly interact with the public, and additional training and information on how to utilize interpretation services shall be available to employees.

For events, a department shall request interpretation services from a city contractor based on requests and knowledge of attendee needs. Bilingual employees who are specialists in the subject matter may host events in languages other than English.

VII. RESIDENT FEEDBACK

Language Access Coordinators shall coordinate with Language Access Liaisons to collect resident feedback on the city’s language access services. Language Access Coordinators and Liaisons should incorporate any feedback into the annual Language Access Strategies.

ROLES AND RESPONSIBILITIES

A. The Language Access Coordinator:

1. Function as the City of Charlotte’s main point of contact regarding this policy and overall implementation strategies.
2. Develop training programs and materials for employee trainings.
3. Coordinate and maintain a webpage for internal and external communications of the language access service.

B. Language Access Liaisons:

1. Coordinate with the Office of Equity, Mobility, and Immigrant Integration to implement this policy within departments using reporting and assessment tools developed by the Language Access Coordinator.
2. Collaborate with the Language Access Coordinator to develop an annual Language Access Strategy for departments.
3. Encourage and promote the use of plain language in department documents and webpages.
4. Coordinate employee trainings on language access services.

C. Department directors:

1. Appoint a Language Access Liaison to oversee the implementation of this policy within the department.
2. Ensure the department’s compliance with this policy.

DEFINITIONS

- A. Limited English Proficient: (LEP) A person who is not able to speak, read, write, or understand the English language fluently. LEP individuals may not be able to interact effectively with city personnel for access to city services. The user of the service or program has the right to self-identify as a LEP person.
- B. Plain Language: Writing that is clear, without jargon or abbreviations that the average person would not know, concise, well-organized, and follows other best practices for the

intended audience. Plain language communications should be easily understood by the average person the first time they read or hear them.

- C. Vital Documents: A vital document is any document that is critical for ensuring meaningful access to understanding and receiving city services. Whether or not a document is vital may depend on the importance of the program, services involved, or the consequence to the LEP person if the information is not provided accurately or in a timely manner.

