

INTRODUCTION

It shall be the policy of Great Lakes Recovery Centers, Inc. (GLRC) (Agency) to ensure that persons with Limited English Proficiency (LEP) shall not be discriminated against nor denied meaningful access to, and participation in, the programs and services provided by GLRC. In order to ensure meaningful access and participation for LEP persons, GLRC shall notify such persons that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the provisions of the Great Lakes Recovery Centers, Inc. LEP Plan and Policies as described below.

The LEP Plan and Policies that follow shall apply to all GLRC programs, services and facilities, regardless of whether or not they receive Federal financial support. However, the LEP Plan and Policies that follow do not apply to the operation or administration of any properties or projects wherein GLRC is not the primary owner (i.e. GLRC is a co-general partner and not the entity with primary control over said property) and the primary owner qualifies as recipient or sub-recipient of federal financial assistance.

It is the intent of GLRC, in providing language services to LEP persons, to achieve a balance that ensures meaningful access to programs and services while not incurring undue burdens on GLRC resources.

GLRC has designated its Access Center Supervisor as its LEP language services manager. This employee shall provide oversight for the implementation of the LEP Plan and Policies, coordinate and facilitate delivery of LEP language services, ensure that staff receives appropriate training on LEP policies and procedures, and direct the ongoing monitoring and periodic assessment of the LEP Plan and Policy's effectiveness.

DEFINITIONS

Limited English Proficiency (LEP) person. Any person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such person or persons shall be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit, or encounter.

Vital document. Any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include but are not limited to applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services. (See Exhibit 2)

Interpretation. The act of listening to spoken words in one language (the source) and orally translating it into another language (the target).

Translation. The replacement of a written text from one language into an equivalent written text in another language. Note: Some LEP persons cannot read in their own language and back up oral interpretation services may be needed for written documents.

Four-Factor Assessment. This is an assessment tool used by the Recipient of federal funding to determine the extent of its obligation to provide LEP services. These four factors are: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided the program to people's lives; and (4) the resources available to the grantee/recipient and costs.

WHO IS COVERED?

USDA's Assurance Agreement (RD 400-4) attached to GLRC's USDA funded projects, assures compliance with Title VI (42 U.S.C. 2000d), 7 CFR Part 15 and 7 CFR Part 1901.202 of the "Civil Rights Act of 1964", requiring all recipients of federal financing assistance from USDA to provide meaningful access to LEP persons. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin. Because language, like culture, is so closely linked to national origin, USDA's final LEP guidance points out that "failure to ensure that LEP persons can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination."

Pursuant to Executive Order 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the LEP Guidance of the Federal Register (FR-4878-N-01) are to additionally apply to programs and activities of federal agencies, including USDA. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: (1) conduct the four-factor assessment; (2) develop a language access plan (LAP); and (3) provide appropriate language assistance.

Coverage under Title VI, Executive Order 13166 and USDA's regulations extends to a recipient's entire program or activity, (i.e., to all parts of a recipient's operations). This is true – even if only one part of the recipient receives the federal assistance. For USDA, this requirement would include its Rural Development Loan Program.

IDENTIFICATION OF LEP PERSONS WHO NEED LANGUAGE SERVICES ASSISTANCE

The Agency shall use the following methodology and data sources to identify and determine the number of LEP persons currently using GLRC's services, the number of LEP persons in the Agency's area of operations who may be eligible for programs and services and the particular languages used by both groups.

The Agency will use various methods to identify LEP persons with whom they have contact. These will include:

- Current and past experiences with LEP persons encountered by staff. The number and type of such encounters will be periodically tabulated and analyzed to determine the breadth and scope of the language services required. In this analysis, consideration will be given to minority language populations that are eligible but may have been underserved because of existing language barriers. To facilitate these encounters, notices will be posted in the lobby of the main office and in the separate lobbies of our program sites where front desk staff are normally present. These posted notices will be in commonly encountered languages and should encourage LEP persons needing language assistance to self-identify.
- Alternate sources of LEP data. As part of its assessment, the Agency will review the Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance available at www.lep.gov/selfassesstool.htm. Data may also be assessed, when available, from State and local governments, State Welfare Departments, school districts, community organizations including faith-based organizations, and legal aid entities.
- “I Speak _____ ” or “Language Identification” (Exhibit 1) form found in the Agency’s area of operations. The form will also be used by staff on a day-to-day basis to determine and document the need for particular language services during routine activities and encounters.
- Staff encounters at initial screening of applicants and at each subsequent screening. Applicants and participants in GLRCs’ various programs will be provided with a Language/Alternate Format Designation form (Exhibit 1). The form will ask if the family requires alternate formats of communication (i.e. large print, audio tape, electronic format, etc) and will also ask applicants and participants to self-identify their need for interpretive services. This data will be captured in their client chart in AWARDS and accessible as a report. The Access Center Supervisor will oversee this process and will generate a record of all requests for alternate format(s) and/or languages other than English. This information shall be reviewed at least annually to ensure that the LEP plan addresses the language needs of persons in GLRC programs.
- Self-identification through the client intake process. The Agency will document during client intake that the applicant has been informed of their right to language services at no cost, identify their primary language, and whether or not they would like an interpreter or prefer to receive documents translated into their primary language.

FREQUENCY OF CONTACT WITH LEP PERSONS:

In conjunction with research to identify LEP persons in the GLRC’s area of operations, the Agency shall also compile information regarding the frequency of contact with LEP persons. The more frequent the contact and or the number of associated requests for alternate format(s) or languages other than English, as self-identified by applicants and participants in its programs, the more likely that language services for a specific language group will be needed. Measures necessary for a program that serves a LEP person one time or occasionally will necessarily be different from those that serve LEP persons every day. While less frequent contact suggests a

different, less intense solution, some services may still be necessary for times when a LEP person occasionally seeks services.

The Agency shall also provide language services in the conduct of its outreach efforts which are intended to make the general public aware of its programs and services. In this manner LEP persons who are a part of the population in the Agency's area of operations will have an equal opportunity to learn about the Agency's programs and services and to access and participate in them. The Agency shall continue to ensure that at a minimum, at least one bilingual-Spanish staff person is available for public events, and shall also continue to provide interpretation in other languages when arranged for in advance. Typically, whenever the Agency intends to hold a public event of any type, a phone number is provided for persons who will require interpretive services in order to participate in the event.

NATURE AND IMPORTANCE OF THE PROGRAM OR SERVICE

The Agency recognizes that within the range of programs and services it provides, some programs and services are more important than others. While it is the Agency's intent to provide meaningful access to all participants and eligible persons, the availability of resources may limit the provision of language services in some instances.

Activities such as outreach, intake, and rules of conduct, legal actions, life and safety notices, and the like have a high priority. Information about and an understanding of these activities should be effectively communicated to all persons affected by them.

Other activities such as recreation programs, social activities, optional meetings, and related areas are of a lesser importance and hence a lower priority.

The Agency shall continue its practice of offering oral interpretation at no charge at meetings, events, and other activities, provided that the need is identified by the participant(s) at least forty eight (48) hours prior to the event. Written communication advertising such events shall provide instructions for requesting interpretation services.

TYPES OF LANGUAGE SERVICES TO BE PROVIDED

The data collected under research into the various language groups in the Agency's area of operations shall be specific enough to inform staff as to the variety of language groups for whom interpretation and translation services may be needed.

The Agency shall provide language services to LEP persons by a variety of methods based upon the relative numbers of such persons and the frequency of contacts or anticipated contacts. Reasonable steps shall be taken to accomplish this but at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population as of July 2016, the Agency shall provide language services as indicated below:

Provision of Written Language Assistance	Language Group(s)	Determination:
Translate Vital Documents	None	Based upon the 2013 U.S. Census data, there are more than 1,000 speakers of these languages who self-identify that they speak English "not well" or "not at all" within the Agency's jurisdiction.
Translated Written Notice of Right to Receive Free Oral Interpretation of Documents	Spanish	Based upon the Agency's past experience with LEP persons encountered by Agency staff, these are the most common languages for which interpretation is requested.
No Written Translation Required	All Others	While no written translation is required for other languages under the LEP Plan, the Agency shall continue its practice of providing oral interpretation when requested by clients/participants of its programs.

POLICY AND PROCEDURES

General. The Agency will post a notice or poster in a conspicuous place in the Agency Programs' main offices that advises clients or members of the general public that interpreter services are available at no charge to the individual who is seeking services or information regarding such services.

The Agency will also display Language Identification ("I SPEAK") cards in the Agencies' main offices and entry points and/or areas where clients or members of the general public are likely to come into contact with the receptionist or management staff.

The Agency will utilize the NorthCare Network's telephone interpretive service that will allow clients or members of the general public who do not speak English to communicate with the Agency's staff or counselors at the time they call or come into the Agency's main office or reception area. Family members of those seeking services may also be used as well as any staff known to be proficient with the LEP person's language requested.

TELEPHONE SYSTEM PROTOCOLS

GLRC will use the Agency Access Center telephone staff to assess the need for LEP interpretation services of the English language. This procedure will be reviewed annually by the Access Center Supervisor to assess its effectiveness and propose any changes to the procedures to allow more efficient access to LEP individuals.

DOCUMENTATION GUIDELINES

Interpretative Services. Use the following guidelines for documenting interpretive services provided to clients and others.

- Document the name of the interpreter, the interview language and the date and time of the interpretation.
- Document the “style” of the interpretation:
 - Phrased interpretation where the provider (e.g., Agency) interviews in short phrases that are translated as accurately as possible by the interpreter.
 - Simultaneous interpretation.
 - Summary interpretation where the provider makes long statement and the interpreter summarizes them.

Translation Services. Use the following guidelines for documenting translation services provided to clients and others.

- Document the name of the interpreter, the interview language, and the date and time of the translation.
- Identify the document translated and whether translation is a summary or a complete and accurate translation.

Marketing and Outreach. In all outreach/marketing materials to include website and general advertising, identify in both English and Spanish that interpretive services are available and the process by which these interpretive services can be accessed by prospective clients and members of the general public. To the maximum extent possible but consistent with the type of information or services being communicated, the Agency will notify prospective clients and members of the General Public that there are other interpretive services available and how they may access them.

Reasonable Accommodation Policy. The Agency will provide information in the briefing packet that this policy and any related documents necessary for a client or member of the general public to request an accommodation or modification of the premises is available in English and Spanish. A notice will advise that interpretive services are available for the other languages.

Procurement of interpretation and translation services for LEP Persons

The following methods of providing interpretation and translation services shall be considered and used based upon the assessment of need for the Agency:

1. Contracting with qualified interpreters and translators, either individually or through an organization which provides such persons. (Essential when accuracy and details are important or critical.)

2. Hiring qualified interpreters and translators. (Essential when accuracy and details are important or critical.)
3. Hiring bilingual staff who subsequently receive training in proper interpretation and translation protocol. (Useful when interpretation needs are regular and ongoing, and when the importance of the encounter may be less than that required in legal action.)
4. Using telephone (or video conferencing) interpreter services. (Useful when prompt delivery of interpretation services is required.)
5. Using community volunteers (either individuals or community service agencies that provide services to one or more language groups. (Useful when language service needs are less important or informal.)
6. Using family members or friends. (Although there are some situations where this is not suitable, in others it may be useful when language service needs are least important or informal.)

The Agency shall explore the most cost effective means of delivering competent language services before limiting services due to resource limitations or concerns. In the process of deciding which services shall be provided, the Agency shall thoroughly document the process used in arriving at the determination of which services are to be provided to which groups. This documentation shall be maintained in the Agency records to demonstrate compliance with the LEP Guidance issued by USDA.

Quality and Competency of Language Services

The Agency shall make every reasonable effort to ensure that the language services it provides to LEP persons are of the highest quality and that the competency of interpreters and translators is appropriate to the situation.

Interpreters. Oral interpretation of encounters, interviews, meetings and the like require a certain level of competency and professionalism on the part of the interpreter. These characteristics do not necessarily exist in a person who is simply bilingual. Likewise, formal certification while helpful may not always be required. Often the importance of the encounter or the consequences will direct the level of professionalism needed. For example, an assessment or court hearing may require a certified interpreter, while a meeting with a client's family about a minor complaint may not.

- Translation and interpretation, whenever possible, shall be provided by Agency staff members who are proficient in a second language, subject to the criteria below.
- If a staff member who speaks the necessary language is not available, the Agency shall obtain translation and interpretation services using the Northcare Language Line Personal Interpreter Service. (Exhibit 4).

When using an interpreter, GLRC shall use the following general criteria to ensure effective communications with LEP persons:

- Demonstrated proficiency in and ability to communicate information accurately in both English and in the other language and able to identify and employ the appropriate mode of interpreting (consecutive, simultaneous, summarization, or sight translation).
- Knowledge in both languages of any specialized terms or concepts particular to GLRC programs or services and of any particularized vocabulary and phraseology used by the LEP person, or the ability to explain either in English or the necessary language, the specialized term(s), concept(s), particularized vocabulary or phraseology.
- An understanding of and ability to follow confidentiality and impartiality rules to the same extent that the GLRC employee for whom they are interpreting or to the extent that their position requires or both.
- Understanding of and adherence to their role as interpreter without deviating into a role as counselor, or other role.
- Awareness of regionalisms (dialects) used by the LEP persons for whom they are interpreting.

When interpretation is needed and reasonable, it shall be provided in a timely manner and appropriate place so as to avoid the effective denial of a benefit or service. The importance of the benefit or service to meaningful access to programs and services will dictate the urgency of providing the language service. Where access to or exercise of a service is not precluded by a reasonable delay, the language service may be reasonably delayed.

Translators. When selecting translators, the list of criteria applied to determine competency and professionalism for interpreters above shall also be applied to the extent that those criteria are appropriate. Translation skills can be very different from those of interpretation. When vital documents are involved, the Agency may decide to use professional translators or translation associations. Translated documents may be checked by a second translator or translated back into English by a second party to confirm accuracy.

Documents Used by GLRC

The Agency shall conduct an initial review of its written documents that are generally available to and used by GLRC clients for the purpose of assessing the importance of those documents to its clientele including LEP persons.

This analysis shall be based upon USDA's "Four Factor Assessment" that is found in the Notice regarding guidance on LEP persons. As indicated earlier under Definitions, the four factors are 1) the number or proportion of LEP persons encountered or eligible to be served; 2) the frequency of contact; 3) the nature or importance of the program or activity; and 4) the resources available to GLRC and the costs.

Based upon this analysis, a determination shall be made as which documents shall be translated and into which languages.

This may range from word for word translation of legal notices to the simple inclusion on other less important documents of a notice in various languages that translations or interpretations may be available upon reasonable request.

The Agency will incorporate the following 'safe harbors' established by USDA for written translations:

Size of Language Group	Recommended Provision of Written Language Assistance
1000 or more in the eligible population in the market area OR among current beneficiaries* (See Note 3)	Translated vital documents
More than 5% of the eligible population or beneficiaries AND more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries AND 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries AND less than 1000 in number ** (See Note 4)	No written translation is required

Note 1: "A 'safe harbor' means that if a recipient provides written translations under these circumstances, such action will be considered strong evidence of compliance with the recipient's written translation obligations." [USDA LEP Implementation Strategy for Federally Assisted Programs.]

Note 2: There are NO 'safe harbors' for interpretation. The 'safe harbor' provisions for written translation "do not affect the requirement to provide meaningful access to LEP persons through competent oral interpreters where oral language services are needed and reasonable. [USDA LEP Implementation Strategy for Federally Assisted Programs]

Note 3: The Agency has used the U.S. Census data to further identify those language groups in the area that are "eligible" based on self-identification that they speak English "less than very well".

Note 4: The Agency does not have any languages that currently exceed the 5% or 1000 "eligible persons" standard using U.S. Census data. However, based upon the Agency's past experience with LEP persons encountered by staff, Spanish is the most common language for which interpretation might be requested. However, Chinese is the most prevalent non-English language in our region.

The assessment shall result in a determination of which documents shall be classified as "vital," and "non-vital." This analysis of documents shall be applied on an ongoing basis as new documents are created and old ones revised. The analysis shall be reviewed on a periodic basis (not less than annually) to consider the overall impact to LEP persons.

As evidenced in the table above, the Agency shall provide written translation of vital documents for LEP language groups that are either (1) 1000 or more or (2) more than 5%, of the eligible population in the market area or among current beneficiaries and more than 50 in number.

Translation of vital documents into other languages that do not meet this criterion may be provided orally if and when needed. If there are fewer than 50 persons in a language group that meets the 5% level, the Agency will not translate documents but will instead provide a written notice in the appropriate language of the LEP group of the right to receive competent oral interpretation of the written materials free of cost.

The Agency shall develop and maintain a register of approved interpreters and translators for language services required for LEP persons.

Type and frequency of notice to LEP persons

The Agency shall provide appropriate notice to LEP persons and language groups of the availability of free language services that ensure meaningful access to programs and services provided by GLRC. Based upon the results of research into the language groups that are encountered in GLRC' area of operations, notices in those appropriate languages informing LEP persons and groups shall be posted in common areas, offices, and anywhere that applications are taken. These notices shall explain how to receive language services.

In addition, as applicable:

- Notices shall be included on or with outreach documents and tagged onto the front of commonly used material.
- Other notices shall be posted as determined appropriate in local newspapers in commonly used languages and in non- English periodical publications in the area of operations, on non-English radio or television programs, and in schools, State and local governmental offices, and other locations where LEP persons may see them.

Training for staff persons

The Agency shall provide training to its staff regarding its LEP Plan and Policies. A determination of the frequency of staff encounters with LEP persons shall dictate the level of detail of this training. All employees who are likely to have contact with LEP persons shall be trained to assure that they know LEP policies and procedures, that they work effectively with in-person and telephone interpreters, and they understand the dynamics of interpretation among LEP providers and interpreters. Staff having the greatest contact shall be trained first to effectively implement the LEP Plan and Policies through the use of standardized procedures. Those staff having the least amount of contact with LEP persons shall, at a minimum, be trained to be fully aware of the Plan and Policies so that they may reinforce its importance and ensure implementation by other staff.

LEP training shall be part of the orientation for all new employees who work with LEP persons. The Agency will document training and orientations on the LEP Plan and Policies for new employees with the level of detail appropriate to their assigned job responsibilities. On-going employees will receive a one-time orientation on the LEP Plan which will be documented. (See Exhibit 3)

Monitoring compliance, assessing performance, and revisions

The Agency shall monitor implementation of the LEP Plan and Policies on an ongoing basis, making revisions to policies and procedures as may be required periodically. The Agency shall also review (not less than annually) the overall effectiveness of its LEP Plan and Policy. This review shall consider information from the following sources and criteria as well as other factors as may be appropriate:

1. Changes in demographics including new language groups and changes in the proportion of existing language groups, types of services, and other needs.
2. Frequency of encounters with LEP persons.
3. Whether existing language services are meeting needs of LEP persons.
4. Availability of new resources including technology.
5. Whether identified sources for assistance are still available and viable.
6. How well staff understand and have implemented the LEP Plan and Policies
7. Feedback from the community at large and from minority language groups and persons.

Based upon findings of the periodic review, GLRC shall revise the LEP Plan and Policies to ensure its effectiveness in meeting the access and participation needs of LEP groups and persons. Staff shall document revisions to the LEP Plan and Policies as they are necessary and the reasons therefore.

Discrimination-Complaint Procedures

For regularly encountered LEP language groups, LEP persons should be provided notice of their opportunity to file a discrimination complaint in accordance with federal regulations. For infrequently encountered LEP language groups, LEP persons should be advised orally of the opportunity to file a discrimination complaint pursuant to the regulations.

HISTORY					
Revised:					
Annual Board Approved:	12/07/2016	12/06/2017			

Exhibit No. 1 - – Language/Alternate Format Designation Form**Great Lakes Recovery Centers, Inc./Alternate Format Designation**

Great Lakes Recovery Centers, Inc. wants to provide effective communication and services to all its clients. This includes persons with disabilities, and persons who do not speak English.

The purpose of this form is to gather information to help us serve you better.

Kinds of Communication

GLRC can communicate with persons who have disabilities in several ways. Check below to tell us how you would like to get information from GLRC:

- I do not need written materials in a different format.
 - I need written materials in the following format:
 - Large Print: This is 18 point font.
 - Audiotape: Text is recorded on an audiocassette tape.
 - Braille: Written text is provided in Braille.
 - Electronic format: Written material is saved as "plain text" on a CD-ROM or 3.5" floppy disk.
 - Spoken: Written material is read aloud by a GLRC employee, in person or over the phone.
 - I need a sign language interpreter.
 - Other (please explain):
-

Your Language

- I speak English and read English and do not need help communicating with GLRC.
- I speak English, but I need help filling out paperwork.
-

I do not speak or read English, and I need written materials in:

- | | | |
|-------------------------------|-------------------------------|---------------------------------------|
| <input type="radio"/> Spanish | <input type="radio"/> German | <input type="radio"/> Chinese |
| <input type="radio"/> French | <input type="radio"/> Polish | <input type="radio"/> Arabic |
| <input type="radio"/> Italian | <input type="radio"/> Finnish | <input type="radio"/> Native American |
| <input type="radio"/> Other: | _____ | |

- I do not speak or read English, and I need written materials in:

- | | | |
|-------------------------------|-------------------------------|---------------------------------------|
| <input type="radio"/> Spanish | <input type="radio"/> German | <input type="radio"/> Chinese |
| <input type="radio"/> French | <input type="radio"/> Polish | <input type="radio"/> Arabic |
| <input type="radio"/> Italian | <input type="radio"/> Finnish | <input type="radio"/> Native American |
| <input type="radio"/> Other: | _____ | |

I have read this form, or it has been read to me.

Print Name: _____

Date: _____

Signature: _____

Exhibit No. 2 – GLRC’s List of “Vital” Documents

Client Intake Forms
Client Assessment Forms
Client Billing/Insurance Forms
Income Verification Forms

GLRC has indicated that it will be adding to this list “as necessary”, the exact timetable for these GLRC forms is not known at this time. In the interim, the Agency will ensure that it provides the necessary interpretation for the GLRC documents as well as translated local documents and notices to allow LEP persons to effectively participate in, or benefit from, its programs. The Agency will review its own forms and documents and determine whether they are “vital” or “non-vital”. Vital documents may include intake and reexamination forms and critical or emergency notices to clients. Other documents that may be considered as “vital” and therefore need to be translated are the Grievance Procedures associated with the various programs. Translations of “vital” documents into other community languages are not required at this time, but this requirement will be reviewed annually.

The failure to provide written translations, however, under the circumstances outlines above will not necessarily mean noncompliance with Title VI and Section 188. If the written translation of a certain document or set of documents would be so financially burdensome as to defeat the legitimate objectives of the provider’s program or activity, and there is an alternative means to provide the LEP persons with meaningful access to the information, such as timely, oral interpretation of vital documents, this may suffice when reviewing the program or activity in its totality.

The Agency will give careful consideration to the safe-harbor guidance when deciding which documents to provide in written form in languages other than English.

Exhibit No. 3 – LEP Staff Training

The Agency's effective commitment to LEP Plan and Policies requires a trained and knowledgeable staff. As a result, GLRC Staff should know their obligations to provide meaningful access to information and services for LEP persons. To be effective, the GLRC LEP Plan includes the following training parameters:

- Staff should know about LEP policies and procedures, and how to implement them.
- Staff should be aware of proper noticing requirements for LEP persons, to include posting of signs in common areas, stating in outreach documents that language services are available from the Agency, and using the telephone voice mail menu, etc.
- Staff should be aware of the types of language services available (i.e., interpretation and translation)
- Staff should be trained on how they can obtain these services for their LEP clients
- Staff should be trained on how to respond to LEP callers
- Staff should be trained on how to use Language-Identification ("I Speak") Forms"
- Staff should be trained on how to respond to written communication from LEP persons
- Staff having contact with the public need to be trained to work effectively with in-person and telephone interpreters
- Staff should be trained on how to respond to LEP persons who have in-person contact with recipient staff, and
- Staff should be trained to know how to ensure competency of interpreters and translation services.

The Agency will provide a one-time orientation of these policies and procedures to all its employees in public contact positions. Training will be provided to new employees as part of their orientation. The more frequent the contact with LEP persons, the greater the need will be for in-depth training. Staff with little or no contact with LEP persons may only have to be aware of the LEP plan. However, management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff.

The Access Center Supervisor will be responsible for monitoring and managing the LEP program. In addition to periodic review of LEP language-assistance practices and procedures, updating staff on more effective ways to serve LEP clients and the laws, rules and regulations pertaining to LEP clients, he/she will maintain a "training registry" that records the names, dates and type of LEP program-related employee training.

To assure the success of the language assistance program, the Access Center Supervisor should monitor the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of its program. This monitoring may include, but need not be limited to:

1. Systematic feedback from LEP clients
2. Systematic feedback from staff;
3. Periodic in-house reviews of the current communications needs of LEP clients; and,
4. Periodic contact with community-based organizations that provide services to LEP clients.

Exhibit No. 4 - Instructions for Utilization of Language Line Services (2017)

Language Line Services allows NorthCare Network to ensure that any consumers, no matter what language they speak can access services at an Upper Peninsula Community Mental Health Agency or one of NorthCare's contracted Substance Use Disorder Providers.

Language Line Services will bill NorthCare on a per usage basis. The fee is expensive; however, since the service is rarely used it is more prudent than paying a monthly contractual fee.

Below you will find up-to-date instructions on how to utilize Language Line Services. It is **IMPERATIVE** that all access/crisis/on-call/customer service/front line staff are aware of these instructions. As you will see, Language Line Services is easy to use. Simply dial their 888 phone number, enter the eight digit pin number (which is specific to NorthCare Network) and then say the "language" that you need. If you have questions about Language Line Services check out their website at www.languageline.com or contact Ashlee Kind, Customer Services Specialist at NorthCare (1-906-225-4411 or 1-888-333-8030).



Language Line Personal Interpreter Service

- To connect to an interpreter, dial 1 888 808 - 9008 •
- At the prompt, enter your 8 - digit PIN number : **34242308**•
- Speak the name of the desired language.
(e. g. Spanish)
- If the language you requested is correct, press 1 .
- An interpreter will be connected. Tell them what you want to accomplish and give them any special instructions .
- Provide the number if you need to have the interpreter place an international or domestic call.



Exhibit No. 5 – Bi-lingual GLRC Staff

Administration Office: Laura Giuchin – Spanish

Adolescent (Youth) Services Program: Collin Hahn – French