

# The City of Cleveland's Language Access Plan

1st Edition

A plan to ensure equal and effective access to city services for Limited English Proficient residents.



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# **City of Cleveland Language Access Plan Introduction**

## **What does LEP mean?**

Limited English Proficiency (LEP) refers to an individual that has limited or no ability to speak, read, write or comprehend English at a level to effectively interact with native English speakers.

## **Why does Cleveland need to implement a Language Access Plan?**

The City of Cleveland is committed to providing an inclusive and welcoming approach to interaction with all residents. As part of that commitment to inclusion the city is ensuring the accessibility of resources, services, and engagement regardless of language.

Title VI of the Civil Rights Act of 1964 is a federal law requiring meaningful access to services for those with limited English proficiency. All federal, state and municipal departments and contracted vendors are required to adhere to such access.

## **How do we define “meaningful access”?**

Ensure that all residents:

- Have adequate information to understand the services and benefits available
- Are able to easily access or receive services for which they are eligible
- Are capable of communicating their circumstances or situations to City staff

## **What are Cleveland’s top spoken foreign languages?**

1. Percentage of population estimation of language groups:
2. Spanish (7.4%)
3. Arabic (0.9%)
4. Chinese [Mandarin, Cantonese] (0.7%)
5. Russian [including Slavic and Serbo-Croatian rooted languages] (0.7%)
6. Indic [Hindi, Urdu, Indo-European] (0.6%)
7. French [combined with variety of African dialogues] (0.4%)
8. Nepalese [newly arrived] (0.1%)

## **What does this plan cover?**

This plan provides a description of the City of Cleveland's 5 phases of the Language Access Program:

- Phase 1: City-wide assessment of Language Access needs
- Phase 2: Implementation of phone interpretation services
- Phase 3: Implementation of written translation services
- Phase 4: Employee Training and Ongoing Monitoring
- Phase 5: Community Outreach

This plan also includes newly created City procedures and policies for effective language access and exhibits of instructional and informational materials that are essential to the Plan.

## **Responsible for ensuring implementation and ongoing monitoring:**

A Language Access Working Group was formed with members from Cleveland City Council, the Office of the Mayor, and the Office of Information Technology and Services. The Group works collaboratively with all City departments to ensure implementation and ongoing monitoring. In addition to ensuring all necessary actions are taken to implement the Plan, the Working Group meets with department representatives regularly to determine additional language access needs. Responsibilities of the Working Group include but are not limited to: Processing vital documents (see below) for translation and distributing documents to appropriate departments; Communicating essential information about the Plan to chiefs, directors, and commissioners; Designing and implementing employee training initiatives in collaboration with the Department of Human Resources; Providing technical assistance to employees using phone interpretation service; Providing all necessary instructional and signage materials for newly offered language access services; And monitoring departmental needs on a quarterly basis.

## **Acknowledgements:**

The City of Minneapolis' guide "Minneapolis in Any Language" and the City of Chicago's "Bridge the Language Gap," among other resources such as [www.lep.gov](http://www.lep.gov) were taken into consideration for the development of the following procedures and policies. Additionally, Legal Aid Society of Cleveland reviewed and offered suggestions to improve this Plan in collaboration with the Language Access Working Group.

# **City of Cleveland Language Access Plan Phases 1-5**

## **Phase 1: City-wide Assessment of Language Access Needs**

- Date of Assessment: Spring 2016
- Implementation of Assessment:
  - Survey sent to each director/commissioner to obtain information on each department's language access needs.
  - Language Access Working Group contacted each department as necessary to obtain additional information on needs.
  - Survey/meeting results compiled and analyzed to determine list of vital documents that needed translation and to determine need for interpretation services.
- Assessment results:
  - 74 vital City documents were compiled for translation to Spanish.
  - Analysis determined need for phone interpretation services available to all departments, particularly public-facing departments whose employees regularly interact with City residents.

## **Phase 2: Implementation of Phone Interpretation Services**

- Date of implementation: July 2016
- Implementation:
  - Purchase order was initiated with vendor in July 2016 for phone interpretation services for every department.
  - The service has been live in the IT Call Center since July 2016.
  - The service will effectively go live for all departments when Phase 4 employee training is completed in 2017.

## **Phase 3: Implementation of Written Translation Services**

- Date of Implementation: September-November 2016
- Implementation:
  - Purchase order was initiated with vendor in September 2016.
  - 74 vital City documents were received from the vendor as translated Spanish copies in November 2016.
  - Documents will be distributed to appropriate departments in 2017 during Phase 4 employee training.
  - Working Group will assess the need for additional document translation on a departmental basis.
  - Working Group will establish the use of "Babel" notices, notices placed at the bottom of vital documents to assist residents who need translated versions.

## Phase 4: Employee Training and Ongoing Monitoring

- Date of Implementation: January 2017-Present
- Implementation:
  - In collaboration with TV20, a brief training video will be sent out to all employees. The video instructs employees on how to effectively use the phone interpretation service.
  - Language Access Working Group will work with all departments on assessing and meeting all training needs and gaps.
  - Working Group will work collaboratively with the Department of Human Resources to roll out effective training initiatives for new and current employees to use phone interpretation services.
  - Language Access Working Group will meet with department representatives on a quarterly basis to review phone interpretation usage and support any additional language access needs.
  - Language Access Working Group will have ongoing discussions around creating a complaint process for residents who have concerns about the provision of language access services.

## Phase 5: Community Outreach

- Date of Implementation: April 2017
  - In collaboration with TV20, Working Group will roll out series of commercials advertising new services in various languages.
  - Working Group will work with Community Relations Department on outreach visits and informational materials to community groups that work with LEP residents.
  - Working Group will work with area organizations like Global Cleveland to conduct outreach to LEP residents.

## Implementation timeline

TASK	COMPLETION DATE
Phase 1	Spring 2016
Phase 2	July 2016
Phase 3	November 2016
Phase 4	January 2017
Phase 5	May 2017

# City of Cleveland Language Access Plan Procedures & Policies

## Notice of Availability of Services

Signage materials indicating the availability of interpretation services include Language ID Laminated Guides, Language ID Posters, and Language ID Desktop Displays for departmental reception areas. Materials will be distributed to departments as needed and will indicate to LEP residents the availability of interpretation services in their native language.

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## Written Translation Policy

Translation is the conversion of written communication from one language to another. An accurate translation is not necessarily word for word, rather conveys the whole meaning of the original text. City of Cleveland must provide professional translation of vital documents free of charge and in a timely manner to people who speak little or no English if requested or if necessary to ensure effective accessibility to City resources, services, and engagement.

## Vital Documents Policy

Information or documents that are critical for accessing federally funded services or benefits, or are documents required by law to include but are not limited to the following:

- intake, consent, complaint or otherwise essential forms;
- applications to participant in, or receive benefit from services or programs; and
- standard forms such as permit applications, birth and death certificates
- written notices of eligibility criteria, rights, denial, loss or decreases in benefits or services

*NOTE: While many vital documents will be immediately available in other languages on the City's website, not all vital documents will be translated. Upon request, any vital document must be translated in a timely manner in the requested language.*

Non-vital documents that do not qualify for free translation:

- handbooks;
  - third party documents, pamphlets or forms;
  - general information that can be found on the website (which is translatable)
-

## **Procedure to get additional documents translated**

The City of Cleveland has a contract with a professional interpreting company and documents should only be translated through their services or by a professional translator. Employees should not use free online translation services without a professional translator reviewing the content. Residents can request document translation services from employees or employees can utilize translation services when appropriate to allow for effective access to services. Submission process instructions will be provided to departments with instructional packets.

## **Policies for interpreting**

1. Interpreters must be offered at no cost, to individuals who speak little or no English if such individual requests interpretation services or if the city staff member determines communication is not possible without interpretation services. Interpretation services must be provided in a timely manner.
2. Interpretation can be provided for public meetings and events if requested with at least a five-business day notice. Public meeting notices shall include a line advising LEP residents that interpreters will be provided upon request if there is at least 5 business days notice.
3. All interpreters must be:
  - a. linguistically competent (have the ability to demonstrate fluency);
  - b. have prior professional experience;
  - c. practice with cultural humility regarding the English language learners situation and culture; and
  - d. abide by the City of Cleveland's code of ethics and professional standards
4. Volunteers, family members or friends should not be allowed to interpret unless they are competent (have the ability to demonstrate fluency). The use of untrained volunteers can expose the city to liabilities
5. Children MAY NOT interpret

## **Procedure to provide an interpreter for city business**

1. Use your phone's conference feature to place the LEP caller on hold or place the phone on "Speaker" mode if the LEP resident is face-to-face.
2. Dial 1-866-874-3972 to reach the City's phone interpretation vendor.
3. Provide your Client ID # (A six digit code that will be provided to each department).
4. Select the language you need or press 0 for agent assistance if you do not know the language.
5. Brief the interpreter. Summarize what you wish to accomplish and provide any special instructions.



6. Say “End of Call” to the interpreter when your call is complete.

TIPS:

- Pause frequently to allow the interpreter to translate information;
- Periodically check with the interpreter to see if you are speaking too fast, slowly or softly, to ensure comprehension;
- Understand that words of emotions and expressions may not have the same meaning when directly translated;
- Talk directly with your client; and
- Avoid oversimplification of important explanations, idioms and colloquialisms

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## **Information and Technology Services Policy**

The City of Cleveland’s Office of Information and Technology Services will add a translation widget powered by Google Translate to all websites maintained by the City. This will allow online users to access information remotely with the same commitment to equal access.

Any translated content that a department has available for public download should also be submitted to the IT department for upload to the site. If an application is available for download from a City website, the respective translated application should be available for download as well.

# Exhibits



## Interpreting Services Available

**English Translation:** Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

<b>American Sign Language</b>  Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.	<b>Korean</b>  귀하께서 사용하는 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.
<b>Arabic</b>  أشير إلى لغتك. وسيتم الاتصال بمترجم فوري. كما سيتم إحضار المترجم الفوري مجاناً.	<b>Mandarin</b>  請指認您的語言，以便為您提供免費的口譯服務。
<b>Bengali</b>  আপনার ভাষার দিকে নির্দেশ করুন। একজন দোভাষীকে ডাকা হবে। দোভাষী আপনি নিখরচায় পাবেন।	<b>Nepali</b>  आफ्नो भाषातर्फ आँल्याउनुहोस्। एक दोभाषीलाई बोलाइनेछ। तपाईंको किन कुनै खर्चको, एकजना दोभाषे उपलब्ध गराइनेछ।
<b>Burmese</b>  သင့်ဘာသာစကားကို ညွှန်ပြပါ။ စကားပြန် ခေါ်ပေးပါမယ်။ သင့်အတွက် စကားပြန် အခမဲ့ ပေးပါမယ်။	<b>Polish</b>  Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.
<b>Cantonese</b>  請指認您的語言，以便為您提供免費的口譯服務。	<b>Portuguese</b>  Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.
<b>Farsi</b>  زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.	<b>Punjabi</b>  आपकी भाषा बोलें। हमें आपकी भाषा में अनुवाद करने के लिए एक अनुवादक को बुलाया जाएगा। अनुवादक को बुलाने में कोई भी खर्च नहीं है।
<b>French</b>  Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.	<b>Romanian</b>  Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret caere vă este asigurat gratuit.
<b>Haitian Creole</b>  Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.	<b>Russian</b>  Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.
<b>Hindi</b>  अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुभाषिया बुलाया जाएगा। आपके लिए दुभाषिया की निशुल्क व्यवस्था की जाती है।	<b>Somali</b>  Farta ku fiilqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.
<b>Hmong</b>  Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.	<b>Spanish</b>  Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.
<b>Italian</b>  Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.	<b>Tagalog</b>  Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.
<b>Japanese</b>  あなたの話す言語を指してください。無料で通訳サービスを提供します。	<b>Vietnamese</b>  Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

## CITY OF CLEVELAND

### ■ When Receiving a call:

1. Use your phone's conference feature to place the Limited English Proficient (**LEP**) speaker on hold.
2. Dial **1-866-874-3972**
3. Provide your Client ID# ●●●●●●●●
4. Select the language you need  
*\*\* Press 0 for agent assistance if you do not know the language*
5. Brief the interpreter. *Summarize what you wish to accomplish and provide any special instructions.*
6. Add the LEP onto the call.
7. Say "End of Call" to the interpreter when your call is completed.

### ■ Note:

When placing an outbound call to a LEP, begin at **Step 2**. If you need assistance placing a call to the LEP, Please inform the interpreter or agent at the beginning of the call.

When the LEP is face-to-face with you begin at **Step 2**. Once the interpreter joins the line, brief him/her and place the phone on "Speaker" mode or pass the handset back-and-forth.

### IMPORTANT INFORMATION:

**WORKING WITH AN INTERPRETER** – At the beginning of the call, briefly tell the interpreter the nature of the call. Speak directly to the limited English proficient individual, not to the interpreter, and pause at the end of a complete thought. Please note, to ensure accuracy, your interpreter may sometimes ask for clarification or repetition.

**3-WAY CALL** – Use the conference feature on your phone, and follow the instructions above to connect to an interpreter. If you are initiating the call, get the interpreter on the line first, then call the limited English proficient individual. If you are receiving a call, ask the caller to "Please Hold," and then conference in the interpreter.

**LANGUAGELINE DUAL HANDSET PHONE** – If you have a LanguageLine Dual handset phone, lift the handset and press the pre-programmed button to dial, then follow the prompts. Once connected to an interpreter, give the second handset to the limited English proficient individual.

**CUSTOMER SERVICE** – To provide feedback, commend an interpreter, or report any service concerns, call 1-800-752-6096 or go to [www.LanguageLine.com](http://www.LanguageLine.com) and click on the "Customer Service" tab, scroll to "Provide Feedback" and complete a "Voice of the Customer" form.

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**CITY OF CLEVELAND**  
Mayor Frank G. Jackson



January 13, 2017

Alex Lackey, Office of the Mayor, 664-2551  
Olivia Ortega, City Council, 664-4539  
Rick Roscoe, 311 Phone Office, 664-6345

## **CITY OF CLEVELAND PHONE TRANSLATION SERVICES**

**Purpose:** The City of Cleveland currently lacks phone translation services for residents that do not speak English. This plan was created so City of Cleveland employees can provide service to these Limited English Proficient (LEP) residents of Cleveland through 3 way phone translation service. This is available to all City departments.

**Goal:** To provide high quality phone service for non-English speaking residents in the City of Cleveland.

**Service Provider:** The City has a contract with Language Line Solutions, a phone interpretation company, who provides interpretation *in any language* through 3 way calling.

**Training:** In early 2017 there will be a TV20 training video sent out via email. Additionally, instructional materials and signage will be made available for reception areas. Human Resources (HR) will also begin including training for incoming and current employees in its orientations. Each department and division will be contacted about setting up individual training sessions as needed.

**Point Person:** Rick Roscoe in the 311 office. [RRoscoe@city.cleveland.oh.us](mailto:RRoscoe@city.cleveland.oh.us) or (216) 664-6345. Or Olivia Ortega, [oa010@case.edu](mailto:oa010@case.edu) (216) 664-4539.

### **How to call into the 3 way call translation service:**

1. Use your phone's conference feature to place the Limited English Proficient (LEP) caller on hold or place the phone on "Speaker" mode if the LEP resident is face-to-face.
2. Dial 1-866-874-3972.
3. Select the language you need or press 0 for agent assistance if you do not know the language.
4. Brief the interpreter. Summarize what you wish to accomplish and provide any special instructions.
5. When your call is completed say to the interpreter, "End of Call."

# Top 10 Places of Origin from which the Foreign Born Moved to the United States

Cleveland, Ohio

ACS Estimates

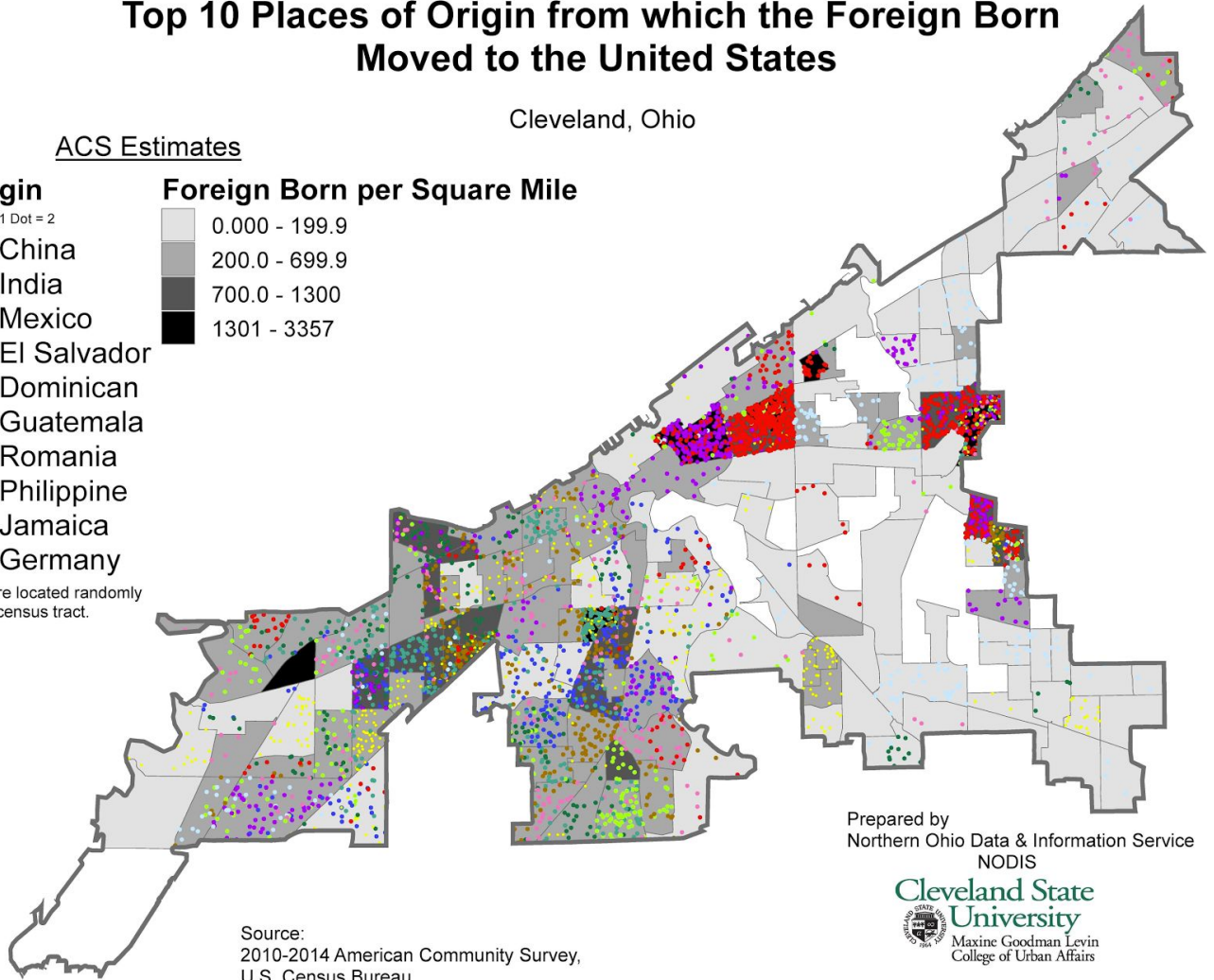
**Origin** **Foreign Born per Square Mile**

1 Dot = 2

- China
- India
- Mexico
- El Salvador
- Dominican
- Guatemala
- Romania
- Philippine
- Jamaica
- Germany

- 0.000 - 199.9
- 200.0 - 699.9
- 700.0 - 1300
- 1301 - 3357

Dots are located randomly within census tract.



Source:  
2010-2014 American Community Survey,  
U.S. Census Bureau

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