Limited English Proficiency (LEP) Plan
Steuben County Department of Social Services

Signed by:
01/05/17
607-664-2000
This *Limited English Proficiency Plan Template* has been prepared to address Steuben County Department of Social Services' responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which states that no person shall be subjected to discrimination on the basis of race, color or national origin and pursuant to NYS OTDA ADM 06-ADM 05 and most recently NYS OCFS 16-OCFS-INF-05 ("Provision of Services to Persons with Limited English Proficiency.")

This Language Access Plan that sets forth the actions we will take to ensure that persons with limited English proficiency ("LEP") have meaningful access to agency services, programs and activities provided by Steuben County Department of Social Service for which they are eligible, including Childcare, Food Stamps, HEAP, Medicaid, Temporary Assistance and Child Support programs. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, states that differing treatment based upon a person’s inability to speak, read, write or understands English is a type of national origin discrimination which is covered under Title VI. This order applies to all state and local agencies that receive federal funds and extends to its sub recipients.

**Plan Summary**

**STEUBEN COUNTY DEPARTMENT OF SOCIAL SERVICES** has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and notification to LEP persons regarding the availability of assistance.

**LEP language needs assessment:**

1. The number or proportion of LEP persons in the service area who may be served by Steuben County Department of Social Services.
2. The frequency with which LEP persons come in contact with Steuben County Department of Social Services.
3. The nature and importance of services provided by Steuben County Department of Social Services to the LEP population.
4. The interpretation services available to Steuben County Department of Social Services and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is found in the following section.
MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Steuben County Department of Social Services

The Steuben County Department of Social Services staff reviewed the American Community Survey 5-Year Estimates for New York State and determined that:

   a. 4,464 individuals in the Steuben County Department of Social Services area, comprising 4.8% of the population, speak a language other than English;
   b. Of those, 1,100 individuals have limited English proficiency; that is, they speak English less than “very well” or “not at all.” This is only 1.2% of the overall population in the service area;
   c. In the Steuben County Department of Social Services’ service area, of those persons with limited English proficiency:

   • ___% speak German
   • 16.5 % speak Spanish
   • ___% speak African languages
   • ___% speak Chinese
   • ___% speak Serbo-Croatian
   • ___% speak Scandinavian
   • ___% speak Japanese
   • ___% speak Russian
   • 20.2 % speak other Indic languages
   • ___% speak Vietnamese
   • ___% speak French
   • ___% speak Tagalog
   • ___% speak other Slavic languages
   • 50.5 % speak Arabic, Indo-European languages
   • ___% speak Native North American Languages
   • ___ % speak all other language

2. The frequency with which LEP persons come in contact with [Steuben County Department of Social Services] services

Steuben County Department of Social Services reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.

   a. To date, Steuben County Department of Social Services has had _1_ requests for interpreters and _1_ requests for translated program documents as follows: [Spanish translation] OR

   b. Steuben County Department of Social Services other staff have had very little contact with LEP persons.

3. The nature and importance of services provided by Steuben County Department of Social Services to the LEP population
There is no large geographic concentration of any type of LEP individuals in the service area for STEUBEN COUNTY. The overwhelming majority of the population, 87.8%, speaks only English. As a result, there are few social, service, or professional and leadership organizations within the STEUBEN COUNTY service area that focuses on outreach to LEP individuals.

The Steuben County Department of Social Services staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.

4. The resources available to STEUBEN COUNTY, and overall cost to provide LEP assistance

Steuben County Department of Social Services can provide LEP assistance for translation if the need arises.

Steuben County Department of Social Services contacted local citizens and organizations willing to provide voluntary language translation and interpretation services if needed within a reasonable time period. Other language translation options could be provided by bilingual staff or by telephone from a professional interpretation service for which Steuben County Department of Social Services would pay a fee.

**LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be eligible to receive language assistance with respect to Steuben County Department of Social Services. Language assistance can include interpretation (that means oral or spoken transfer of a message from one language into another language) and translation (that means the written transfer of a message from one language into another language).

How the Steuben County Department of Social Services staff can identify an LEP person in need of language assistance:

- Post notices of the LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Providing Steuben County Department of Social Services staff with language identification cards to assist in identifying the language interpretation services needed if the occasion arises.
- Periodically surveying Steuben County Department of Social Services staff regarding their interaction with LEP persons during the previous period (e.g., quarterly, semi-annually, and annually).
- Greeting participants at Steuben County Department of Social Services a sponsored informational meeting or event. Conversational interaction with participants can help determine LEP needs for future events.
Language Assistance Measures

Although there is a very low percentage of LEP individuals in the Steuben County Department of Social Services service area, (i.e., persons who speak English less than “very well” or “not at all”), Steuben County Department of Social Services will take the following actions:

1. Steuben County Department of Social Services staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:

A Language Interpretation Services

Oral Interpretation: Language Interpretation Services will be provided free of charge to all Steuben County Department of Social Services clients. If you need an interpreter, signs advising LEP individuals of the availability of free interpretation services prominently displayed in all public access areas at Steuben County Department of Social Services and at the DSS Reception Window (Sample Below).

Steuben County Department of Social Services must provide a qualified interpreter free of charge for in-person substantive appointments and other significant interactions with the agency (e.g. eligibility interviews, disability evaluations, employability plan development, conciliation). Steuben County Department of Social Services staff cannot require, pressure, or encourage individuals to use an applicant/recipient’s friends or family members to interpret, though individuals have a right to have a friend or relative interpret if they prefer that option. Minor children shall not be used to interpret.

An adult friend who has accompanied an individual with a disability to Steuben County Department of Social Services can only be used to interpret only if:
1) The individual with a disability specifically requests it;
2) The accompanying adult agrees; and
3) Using the accompanying adult is appropriate under the circumstances (i.e., the individual has sufficient ability in English and American Sign Language, and it is appropriate for the individual to participate in communications involving confidential and personal matters)

OR

4) In an emergency involving an imminent threat to the safety of the individual or the public; and
5) No interpreter is available. Before concluding that an interpreter is not available, staff must attempt to obtain an interpreter by calling the interpreter service.

In many situations, it will not be appropriate to use an accompanying adult to interpret, because of the nature of the client’s disability (and difficulty determining the client’s true wishes and comfort level) or the nature of the services the client is receiving from Steuben County Department of Social Services (i.e., adult or child protective services).

Whenever an individual comes to Steuben County Department of Social Services with a family member or friend who identifies him or herself as the person’s interpreter, Steuben County Department of Social Services staff must inform the individual that Steuben County Department of Social Services staff have an obligation to provide an interpreter free of charge, and must ask the individual if he or she wants Steuben County Department of Social Services to provide an interpreter.
B. TRANSLATION OF VITAL DOCUMENTS
- Interpreter Services Desk Guide available to all workers at the DSS Reception Window (Sample Below)

- Downloadable OTDA forms in various languages. A listing of the forms can be found by accessing the following link http://otda.state.nyenet/ldss_eforms/ (See attached instructions on accessing the forms through Centraport).

- Language Access Resources provided by OTDA by calling (518) 402-3096

- Downloadable OCFS forms in various languages. A listing of the forms and information on OCFS can be accessed in various languages by going to http://ocfs.ny.gov/main/documents/ (See attached instructions on accessing the forms through Centraport).

- Language Access Resources provided by OCFS by calling 518-402-3130

- USDA SNAP Multi-Lingual Palm Cards Instructions guide on accessing State forms available in other languages: see attachment D

Steuben County Department of Social Services weighed the cost and benefits of translating non-OCFS and non-OTDA documents for potential LEP groups. Considering the expense of translating documents, the likelihood of frequent changes in documents and other relevant factors, Steuben County Department of Social Services has determined that it is an unreasonable burden to translate documents at this time.

Due to the very small LEP population, Steuben does not have a formal outreach procedure in place as of 2018. Translation resources have been identified and are limited in this region. However, if the need arises to conduct outreach to LEP individuals, Steuben County Department of Social Services will consider the following options:

- When staff prepares documents or schedules public meeting whose audience is expected to include LEP individuals, Steuben County Department of Social Services will provide meeting notices, flyers, and agendas in the appropriate non-English language(s).

- Steuben County Department of Social Services will assess requests for the translation of documents based on the potential effect and known LEP population.

- Volunteer Spanish language interpreters will be provided within a reasonable time period.

C. Phone Services-
The New York Relay Service is a statewide service that connects standard (voice) telephone users with deaf, hard of hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones.

- This service allows TTY or VCO users to communicate with standard telephone users through specially trained Relay Operators. Calls can be made to anywhere in the world, 24 hours a day, 365 days a year with no restrictions on the number, length, or type of calls. The New York Relay Service may be reached by calling 2-1-1 or 1-800-346-2211. Staff should contact the relay service when calling a client with speech or hearing impairments.

Language interpretation services for all other languages will be accessed through a professional telephone interpretation service.
STAFF TRAINING

All staff that interacts with LEP clients will be trained by Staff Development on Steuben County Department of Social Services' Language Access Plan and how to utilize the language access resources that are available at Steuben County Department of Social Services.

Training will include:

a. The legal obligations to provide meaningful access to LEP individuals
b. How to access language assistance services
c. Cultural competence and cultural sensitivity
d. Documenting the language needs of LEP individuals and the language services provided to them by the agency
f. How to obtain written translation services

Steuben County Department of Social Services shall ensure that all current SDSS employees receive a copy of the Language Access Plan. All new Steuben County Department of Social Services employees shall receive a copy of the Language Access Plan when hired.

All contractors or subcontractors performing work for Steuben County Department of Social Services are required to follow the Title VI/LEP guidelines.

MONITORING

Monitoring and Updating the LEP Plan – Steuben County Department of Social Services will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when recent data from the U.S. Census and the American Community Survey is available, or when it is clear that higher concentrations of LEP individuals are present in the Steuben County Department of Social Services service area. Updates to the LEP Plan will include the following:

- The number of documented LEP contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area (census data, surveys, information from community-based organizations, and other sources).
- Determination as to whether the need for translation services has changed.
- Determination of the effectiveness of language assistance efforts.
- Determination of the adequacy of Steuben County Department of Social Services financial resources to fund language assistance resources.
- Determination of Steuben County Department of Social Services full compliance with the goals of the LEP Plan.
- Determination of the Steuben County Department of Social Services processing of LEP complaints.
DISSEMINATION OF THE STEUBEN COUNTY DEPARTMENT OF SOCIAL SERVICES LEP PLAN

Steuben County Department of Social Services will choose from the following actions:

- Post signs in Steuben County Department of Social Services public areas informing LEP persons of the LEP Plan and how to access language services.
- Notify LEP persons of the availability, upon request, of documents in other languages. This should be placed on agendas and public notices and in the language that LEP persons would understand.
- On STEUBEN COUNTY'S website, post the LEP Plan and procedure to access language services.
- Prepare and post Press Release in non-English languages as necessary.
- Distribute copies of press release to advocacy groups and other organizations serving LEP populations.

Grievance Procedure

- Anyone has a right to file a grievance with Steuben County Department of Social Services if the person believes he/she was denied Language Access Services. Steuben County Department of Social Services has a Language Access Complaint form (Appendix A).
- If a grievance is submitted to a Steuben County Department of Social Services staff person, the staff person must forward it the same day it is received to the LAP Coordinator.
- The LAP Coordinator must review the Complaint and implement corrective action if needed within 7 business days.
- The LAP Coordinator should consider whether one or more complaints on an issue indicates the need for changes in policies or practices, and if so, take steps to obtain these changes.
- Using Family and Friends as Interpreters
- In order to ensure confidentiality LEP clients may not use a family member, friend, or a minor as an interpreter other than in an emergency.
- However, upon request of the LEP client a family member or friend may be used for routine matters such as location information, business hours and rescheduling an appointment.
- Lise Reynolds is designated Steuben County Department of Social Services Language Access Coordinator (LAC). As the LAC she will supervise Steuben County Department of Social Services' language access plan and monitor the success of the plan by annually collecting data on the provision of language assistance services and the availability of translated materials. The Language Access Plan will be reviewed and updated as necessary on an annual basis.
- Complaints of violations of the LAP by Steuben County Department of Social Services applicants, recipients and others covered by the LAP must be referred to the Steuben County Department of Social Services LAC Coordinator, Lise Reynolds, STEUBEN COUNTY DEPARTMENT OF SOCIAL SERVICES Department of Social Services, 3 East Pulteney Square, Bath, NY 14810. Or by calling 607-664-2000.