

**ADVOCATE SAFEHOUSE PROJECT (ASP)
Policies and Procedures**

LANGUAGE ACCESS POLICY & PLAN

PURPOSE: Per DVP Rule 12.202.2 B.4, funded programs shall establish a written language accessibility plan to minimally include the use of interpreters, translators, bilingual staff, and/or written materials to provide services to clients who are Deaf or Hard of Hearing and those with limited English proficiency.

Advocate Safehouse Project recognizes that providing meaningful language access is a critical function of ensuring safety and security for all survivors of domestic and/or sexual violence. The purpose of this Language Access Policy and Plan is to ensure that ASP provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. ASP 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.
- Title VI of the Civil Rights Act of 1964 and Executive Order 13166, calls for guidelines for agency personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP).

POLICY STATEMENT: Advocate Safehouse Project will never turn anyone away because they do not speak English. ASP’s primary focus is to provide support and safety to survivors of domestic and/or sexual violence through direct services. Therefore, ASP will develop and secure sustainable language resources as needed in both oral and written form so that all survivors will have timely and meaningful access to information or services for persons with LEP, including those that are Deaf or Hard of Hearing (DHH).

All staff and volunteer advocates shall provide free access to language assistance services to individuals with LEP whom they encounter or whenever a person requests language assistance services. ASP staff will inform members of the public that language assistance services are available free of charge to persons with LEP and that the organization will provide these services to them. ASP will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.

PROCEDURES:

Advocate Safehouse Project expects its staff and volunteer advocates to familiarize themselves with the language access protocol and resources outlined below. Staff and volunteer advocates should work directly with supervisors with questions or concerns, or to report difficulties in access the indicated resources.

Point of Contact	Expectations of Staff & Volunteer Advocates	Tools & Resources
24-Hour Help Line	Identify language spoken. Connect with bilingual staff, interpreter, etc.	Bilingual Staff Language Line Colorado Relay & TTY
One-on-one survivor meetings (intake, case management, counseling sessions, etc.)	Ensure that an interpreter is available. Follow best practices for ensuring safety for survivor by securing the name of the interpreter in advance,	Bilingual Staff In-Person Interpreting Agency Interpreter Confidentiality Agreement

	requiring an interpreter to sign a confidentiality agreement, etc.	
Safehouse Services	Notify survivor of available language services on an ongoing basis, immediately provide access to the language line when requested.	Bilingual Staff Language Line Colorado Relay & TTY
Community-Based Services	Meet with other agencies and provide information about LEP plan and resources so they may assist in informing LEP individuals of language assistance services available.	Flyers Brochures Website
Providing Referrals	Call the referral source and identify a point of contact with adequate language capacity (after getting a signed release of information form). Connect survivor with that point of contact. Request and review the LEP plan for the referral source (courts, medical offices, other DV services, etc.).	In-Person Interpreting Agency Bilingual Staff Language Line Language Access Cards Colorado Relay 711
Community Events	Identify language spoken. Connect with language line or Colorado Relay to assess safety concerns and requests.	Bilingual Staff Flyers Brochures Language Line Colorado Relay
Support Groups	Arrange for an interpreter to be present when requested at every support group by a non-residential LEP or DHH survivor.	Bilingual Staff In-Person Interpreting Agency
Written materials	Vital documents (intake, confidentiality agreement, client rights, etc.) will be translated into the second most common language at the organization (i.e., Spanish). If necessary, vital documents will be reviewed with an in-person interpreter during intake or other sessions.	Additional translations can be arranged through a translation agency such as the Translation and Interpretation Center.

Using Bilingual Staff:

Advocate Safehouse Project shall consider second language proficiency, in a language commonly spoken by ASP survivors, as a preferred quality when hiring new staff and volunteer advocates.

Using an Interpreter:

When Advocate Safehouse Project staff members who are working directly with a survivor are not fluent in the survivor's language, ASP 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, ASP will use Language Line or a similar over-the-phone interpreter service.

Conversations using interpreters remain confidential per CRS 13-90-107(h). This states that "a qualified interpreter, pursuant to section 13-90-202, who is called upon to testify concerning the communications he interpreted between a hearing-impaired person and another person, one of whom holds a privilege pursuant to this subsection (1), shall not be examined without the written consent of the person who holds the privilege."

PLAN TO BUILD ORGANIZATIONAL CAPACITY:

Notification of Language Assistance Services:

Posters notifying survivors with LEP of their language service rights will be developed and displayed in areas where intakes are conducted in both English and Spanish. These posters will contain a simple message - such as 'Free Interpreter services are available. Please ask for assistance.' Flyers will also be developed and made available throughout the program and community.

In its office, Safehouse and website ASP will post and maintain clear and readable signs in English and Spanish notifying survivors that free translation and interpretation services are available to them.

Staff Compliance:

Advocate Safehouse Project staff and volunteer advocates will initiate an offer for language assistance to clients who have difficulty communicating in English.

All ASP staff and volunteer advocates will inform members of the public that language assistance services are available free of charge to persons with LEP and that ASP will provide these services for all services offered.

Staff & Volunteer Advocate Training:

ASP shall provide training to its staff and volunteer advocates 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 staff who are likely to have contact with LEP persons shall be trained to assure that they know LEP policies and procedures.

Monitor Effectiveness Plan:

1. Advocate Safehouse Project 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 Advocacy Director 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; and
 - 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. Advocate Safehouse Project staff and volunteer advocates will record each survivor’s language of choice on the intake sheet. If the survivor has limited English proficiency, the person’s language of choice will be clearly marked in their file.

3. Advocate Safehouse Project 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 ASP’s Board of Directors. The Advocacy Director 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, ASP may use some of the following tools to conduct further assessment:
 1. Conduct surveys or focus groups;
 2. Develop an evaluation process to assess LEP service provision; and/or
 3. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

Implementation Calendar:

Language Access Strategy	Implementation Timeline	Person Responsible
Train all staff and volunteer advocates on connecting to Language Line services.	Target: 95% staff will be able to successfully implement language access strategies by March 31 st of each year.	Advocacy Director
Add “Preferred Language” Categories to Intake Form to improve screening and evaluation	New intake categories for “Preferred Language” will be implemented by March 30, 2017. Data input begins in April, first quarter analysis of language access needs completed by July 15, 2017. Goal of 80% completion of the new category on the intake in the first quarter (April – June 2017).	Advocacy Director

Community Outreach and Collaboration:

Advocate Safehouse Project will identify the primary sources through which survivors with LEP are referred to ASP services, and culturally-based organizations that serve individuals with LEP in our community. ASP 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.

Advocate Safehouse Project will share its LEP Policy and the documents and knowledge it develops in regard to LEP resources with the other service organizations in the area, namely District Attorney’s Office, Catholic Charities, and any other not-for-profit organization that requests the information.

Work Plan Specific to Deaf & Hard of Hearing (DHH) Language Access:

1. Advocate Safehouse Project’s brochures, literature, and website will have language that indicates that survivors with hearing disabilities are welcome, includes appropriate universal symbol of accessibility, and provides a TTY number for the 24-hour Help Line and office by December 31, 2017 as written material is ordered.

2. Regularly scheduled training for all staff and Board of Directors on providing services and accessibility for DHH clients. This training will include, but not be limited to, communicating in person with clients who are DHH, sign language interpretation options, how to use assistive communication tools including Colorado Relay, and ADA requirements.
3. Continuing efforts will be made to find available, community-based ASL interpreters, including ASL interpreters that would be available on a 24-hour basis.
4. Provision of a range of language assistance options, within the limits of ASP's financial and organizational ability, that will include one or more of the identified options listed below by December 31, 2017.
 - a. Certified/licensed ASL interpreter
 - b. Video Remote Interpreting (VRI)
 - c. Telecommunication Relay Services (TRS)
5. Purchase and have available a Safehouse phone with volume control and call flasher by February 28, 2017.
6. Purchase and have available assistive listening devices for Safehouse and outreach offices by February 28, 2017.
7. Install a smoke detector in the Safehouse that has audio and visual signals (flashing light that signals the presence of smoke) by February 28, 2017.
8. Purchase and have available a Safehouse notification device (flashing light that signals a door knock) by February 28, 2017.
9. The purchase of a Teletypewriter (TTY) by February 28, 2017.
10. Yearly monitoring of ASP policies, procedures, and budget as relates to the Language Access Policy for DDH survivors of domestic and/or sexual violence.

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.)

Resources

Deaf Overcoming Violence through Empowerment (DOVE): 303-831-7874

Language Line: 1-800-752-6096

Relay Colorado: 711

Translation & Interpretation Center: 303-996-0976