

Audubon Neighborhood Association Language Access Policy & Procedure

I. Policy Statement

The Organization will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits.

The policy of the Organization is to ensure meaningful communication with LEP persons who are eligible voting members with respect to their participation with the Organization.

The policy also provides for communication of information contained in those documents which are essential to voting member participation and engagement.

All interpreters, translators and other aids needed to comply with this policy will be provided to LEP persons without cost to the LEP person. Members will be informed of the availability of no cost language assistance

II. Purpose

The purpose of this policy is to substantially comply with City of Minneapolis grant requirements which pass through state or federal legal requirements that might not otherwise apply to this Organization. (i.e., Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act, etc.). This policy establishes guidelines for providing language accessible services to individuals that are Limited English Proficient or Deaf or Hard of Hearing so that these individuals can access grant funded programs of the Organization.

III. Budget

The Organization will implement this policy to the extent that the law or grant program requires and so long as funds are available.

IV. Language Assistance Procedures

A. Language assistance determination in two forms:

1. The LEP person (or their representative or companion) makes a direct request.
2. Staff (or volunteers, etc.) conduct an assessment, and determine assistance is needed.

The following are guidelines about staff assessments:

- a. Staff (or volunteers, etc.) at the initial point of contact will conduct an assessment for the need for language assistance and notify the individual(s) of the right to an

interpreter at no cost. Staff members who have subsequent contact will continue to assess the need for language assistance.

- b. To assess the need for language assessment, staff should ask open ended questions, and avoid asking questions that would allow for yes or no responses. For example, ask: “how can I help?” instead of “do you need help?”
- c. The LEP person may speak more than one language. Or, they may have limited proficiency in a secondary language. Staff will identify the primary language of the LEP person, and work to provide language assistance in the primary language of the individual.
- d. A Deaf person may also be limited English proficient and also not be proficient in American Sign Language. Staff will work to identify the primary language of the Deaf person and provide language assistance in the primary language of the individual.

B. How to determine the primary language:

- 1. Staff will request that the LEP person (or companion) identify their preferred / primary language.
- 2. If bilingual / multilingual staff or volunteers are available to assist, staff may request their help in identifying the primary language.
- 3. Use in-person, video remote interpreters, or telephonic interpreters to identify the primary language.
- 4. Use an “I speak” card or poster to identify the primary language.
- 5. Staff should determine of the preferred mode of communication for a Deaf or Hard of Hearing person is interpretation or a different translation mechanism.

C. Requesting interpretation or translation services:

- 1. Advance requests: After receiving a request for planned interpreter services at least one week in advance, or a request for document translation services at least two weeks in advance, the Organization will contract with an interpretation or translation service provider.
- 2. Immediate requests: For immediate interpretation service needs, bilingual staff or an LEP person's volunteer may be utilized if available.
- 3. Additional resources: Staff may also reach out to City of Minneapolis, Neighborhood Community Relations department which has community specialists who speak Spanish, Somali, Lao and Hmong. The City also maintains several phone lines to support non-English-speakers and those who are deaf or hard of hearing.

Spanish Line: 612-673-2700
Somali Line: 612-673-3500

Hmong Line: 612-673-2800
TTY Line: 612-263-6850

4. Recurring requests: For frequent contact with individuals who speak limited or no English, staff may contact the NCR Access and Outreach Manager at 612-673-3737 to discuss how best to handle translation needs on a recurring or regular basis (i.e. in the case of a board member or committee member who requires routine translation services).

V. Interpreter & Translation Policy

The Organization will:

1. Provide timely interpreter or document translation services wherever possible. LEP requests for interpretation translation services must be made at least one week in advance of the date the service is needed. LEP requests for document translation services must be made at least two weeks in advance.
2. Utilize trained professional interpreters and translators who are culturally competent and adhere to a code of ethics and professional practice standards (i.e. the American Translators Association Code of Ethics and Professional Practice).
3. Allow LEP persons to use their own adult volunteer to interpret or translate in their own language. The Organization will, however, never require members to provide their own volunteer. Minor children may not serve as interpreters absent emergency circumstances.
4. As a standard practice, the Organization will provide a translation of meeting notices published to the general public, this includes a call for board member applications.
5. Upon specific request, the Organization will provide a translated document or interpreter service for the following vital documents: annual financial statements; articles and bylaws; accounting records; the final approved meeting minutes of its board, committees, and task forces for the last six years; and any other documents as determined by the Board of Directors to be vital from time to time.

VI. Signage / Notices

1. Signage will be placed in visible locations notifying LEP persons of the right to request an interpreter at no cost. Signage will be translated into the languages most frequently encountered by the organization.
2. Staff at the initial point of contact, will notify LEP persons of their right to an interpreter at no cost.

3. When vital documents are published in physical spaces or to the Organization's website or social media platforms a language access notice will accompany the publication that reads:

"This information is important. If you need help understanding the information, call [phone number]. If you need these documents in a language other than English, tell the representative and we will arrange for an interpreter and / or document translation."

This notice will be translated into the languages most frequently encountered by the Organization.

VII. Definitions

1. Limited English Proficient (LEP) person means any individual whose primary language is not English, and has limited or no ability to speak, understand, read, or write English.
2. Interpretation is the process of orally rendering a spoken or signed communication from one language into another language.
3. Primary language means the language that an individual communicates most effectively in.
4. Translation is converting written text from one language into written text in another language. 'Translation' is often misused to mean interpretation, but it is a written medium.
5. A qualified interpreter or translator is a trained professional who is a neutral third party with the requisite language skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology in order to effectively facilitate communication between two or more parties who do not share a common language.
6. Vital Documents are any materials that are essential to an individual's ability to access services provided by the organization, exercise their voting member rights or that are required by law.

VIII.Biennial Monitoring

The Organization will conduct a biennial review of language use by the community and the needs of the member population. The Organization may rely on available Census data, Municipal data or other recognizes sources in determining what the primary language groups are in the stakeholder community.

In addition, the Organization assess the efficacy of these procedures in a biennial basis. This assessment includes but is not limited to how the Organization secures interpreter services, any equipment used for the delivery of language assistance, any complaints to the Organization filed by LEP persons, feedback from members or partner community organizations, etc.

Approved and adopted by the Audubon Neighborhood Association Board of Directors 12.27.21