



Language Access Plan (LAP)

Introduction and Purpose

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”, Puentes has established the following LAP to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our agency. An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.”¹ The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across beneficiaries. This is essential to our mission of providing support to marginalized communities. To prepare for the development of this plan, we conducted a Four-Factor Analysis which balanced the following factors:

- The number or proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which the LEP persons come into contact with the Puentes;
- The nature and importance of the program, activity, or service provided by the Puentes;
- Puentes’ ability to serve the population with both language skills and cultural competency.

Persons Charged with Implementing the Plan

The President and Social Worker assigned to the Latino community will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, they jointly will be charged with maintaining and updating this plan as the need for changes arises.

Identification and Assessment of LEP Communities

Puentes is a small agency that has traditionally served the Latino and African American population. At this time, our LAP is limited to Spanish language services though will expand in accordance with new funding opportunities and our continued growth.

We are well established in the communities we serve and are well known within a large network of community-based organizations with which we’ve established collaborative partnerships. To that extent, our LEP community is well identified and assessed.

That said, as our community evolves over time, we will continue to monitor shifts in our population’s demographics through annual assessments to ensure that we are adequately tracking LEP representation in our jurisdiction. To the extent funding, and thus staffing permit, we will also work to identify LEP individuals in our normal encounters with the public by responding to individual requests for language assistance services and collecting and recording primary language data from individuals when they first engage with our programs and services.



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Language Assistance Services

It is our understanding that these LEP individuals may interact with our staff in a number of ways, potentially including:

- Outreach programs;
- Information line calls;
- Our website;
- Written materials.

Accordingly, both oral and written language assistance services will be provided.

In addition to language access services provided to individuals in the community, Puentes supports other Community Based Organizations in their efforts to serve diverse populations. For example, we currently manage Spanish speaking client referrals from Baby's Bounty and Casa de Luz, and provide assistance with translating brochures and other content whenever requested.

Oral Language Assistance

Oral language assistance may be necessitated by encounters with LEP individuals either over the phone, in person, or during outreach engagements. When one of these encounters occurs, staff members will carry out the following protocol:

For communication over the phone:

The staff member will first make an effort to identify the primary language of the individual. If that staff member is approved as bilingual in the individual's primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will transfer the call to another staff member who has been approved as bilingual, as listed in the Staff Directory. If no bilingual staff member is available to assist the individual, then the individual will be referred to another agency or volunteer able to communicate with the LEP individual.

For communication in person:

The staff member will first make an effort to identify the primary language of the individual. If that staff member is approved as bilingual in the individual's primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will contact another staff member who has been approved as bilingual, as listed in the Staff Directory, to come and assist the individual. If no bilingual staff member is available to assist the individual, then the individual will be referred to another agency or volunteer able to communicate with the LEP individual.



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Written Language Assistance

All written materials will be made available in both English and Spanish, including brochures, event announcements and our website. We encourage our community partners to provide material they request to have distributed in both English and Spanish

Guidelines for Interpreters and Translators

While no formal certification is required for staff members listed as bilingual, individuals providing interpretation or translation services must:

- Be proficient in and able to communicate information accurately in both English and the other applicable language;
- Understand agency-specific terminology;
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator;
- Be aware of regionalisms and cultural nuances and be able to provide the most appropriate interpretation in a consistent manner.

LEP individuals may bring another individual to provide interpretation who has not been approved for formal interpretation services by the agency. Oftentimes in the Latino culture this will include children or siblings of the individual seeking services. During these encounters, staff will:

- Explain to the interpreter the purpose of the communication and the information to be conveyed;
- Briefly explain to the interpreter technical terms that may come up during the communication;
- Avoid the use of acronyms, double negatives, and contractions;
- Speak in short sentences that contain one idea at a time;
- Talk to the applicant and not to the interpreter;
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.

Providing Notice of Language Assistance Services

To ensure that members of LEP communities are aware of the free language assistance services provided to them, the following marketing and outreach steps will be taken:

- Include non-English instructions on telephone menus;
- Place translated materials in conspicuous locations describing different services;
- Update non-English content on the agency/program website;
- Distribute translated materials to schools and community organizations that explain how to access language assistance services;
- Publish notices in non-English media about programs and services offered;



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Training Staff on LEP Policies and Services

As a matter of policy, Puentes approach to serving marginalized populations with cultural competency is to hire and empower people from the cultures and backgrounds we serve. Our engagements are thereby innately responsive and provide the heightened levels of accessibility, guidance, support and functionality essential to addressing the anxiety, distrust and hesitancy that are common within communities that have endured years of systemic and structural inequality.

Our staff are themselves from the cultures and communities they serve and further draw from the extensive collaborations Puentes has developed with ethnic and racial-specific community-based organizations that have established track records in the community.

Staff who will be engaged in this program are experienced both in working with hesitant populations as well as with the techniques and technologies we use to collect information. They receive further training and guidance on an ongoing basis through regularly scheduled staff meetings as well as a robust and cooperative internal communication network.

With reference to our Language Access Program, all staff receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of New Employee orientation and refresher training will be provided periodically at staff meetings. After completion of the training, staff should understand:

- Their obligation to provide meaningful access to information and services to LEP individuals;
- The protocol for handling various encounters with LEP individuals, as established by this plan;
- How to use the Staff Directory to identify approved bilingual staff members;
- How to access translated materials and interpretation services for provision to LEP individuals.

Monitoring, Evaluating, and Updating this Plan

All Puentes interventions have evaluation components built into them which designed to build evidence and facilitate ongoing improvement. The President and Social Worker assigned to the Latino community will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, they will make use of the following mechanisms:

- Survey staff on how often language assistance services are used and how they could be improved;
- Conduct customer satisfaction surveys of LEP individuals;
- Observe and evaluate agency interactions with LEP individuals;
- Solicit feedback from community-based organizations and other stakeholders;
- Keep current on community demographics by engaging with local resources;
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- Monitor the agency's response rate to suggestions or requests by LEP individuals;



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- Maintain a record of available services for LEP individuals and the frequency of their use;
- Maintain a record of funds and staff time spent on language assistance services.

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