

BUNCOMBE COUNTY LANGUAGE ACCESS PLAN

Welcome

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Добро пожаловать

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Bienvenidos

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BACKGROUND

On May 1, 2023, a countywide Language Services Policy was put into effect to ensure that Buncombe County fulfills its responsibilities around serving persons with a non-English language preference (NELP).

<https://www.buncombecounty.org/common/policies/Language%20Services%20Policy.pdf>

Timely and accurate communication with the public is essential to the County's mission to promote a healthy, safe, well-educated, and thriving community with a sustainable quality of life. Language access is a critical component in ensuring that communications, programs and services are accessible to everyone. Because the County receives funding from the Federal government, language access is required for compliance with federal regulations, including, but not limited to, Title VI of the Civil Rights Act of 1964, the 1987 Civil Rights Restoration Act and Executive Order 13166. Certain programs or departments across the County may have additional responsibilities for compliance.

In 2023, Buncombe County was selected to participate in the Local Government Language Access Collaborative at the Institute for the Study of the Americas at UNC-Chapel Hill. The Collaborative builds relationships between local governments and community partners. County staff along with community partners from [Poder Emma](#), a local agency supporting cooperative development in neighborhoods with significant immigrant populations, formed a team to work through a year-long language access course developed by the Institute staff at UNC-Chapel Hill with the goal of producing a Language Access Plan for the County.

PURPOSE

This Language Access Plan (LAP) has been developed to support the implementation of the Language Services Policy. The Plan will assist the County in achieving goals related to strengthening connections and partnerships with communities where barriers to participation can be eliminated by fostering awareness and providing guidance and resources. The Plan is a living document and will be updated as necessary as the County works toward taking steps to ensure meaningful language access for all individuals whose first language is other than English.

DEFINITIONS

- Bilingual staff – A staff person employed by Buncombe County who has demonstrated proficiency in reading, writing, speaking, and/or understanding at least one other language in addition to English as authorized by their department and approved by the Human Resources department (HR).
- Departmental Language Liaisons – Staff who have been designated to support the Language Services Policy and Language Access Plan in their departments. The role will be further defined as needs are identified.
- Interpretation – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. In the case of American Sign Language (“ASL”), interpretation is the act of conveying meaning between people who use signed and/or spoken languages.
- Language Services – Oral and written language services needed to ensure that individuals with an NELP may communicate effectively with staff, and to provide those individuals with meaningful access to, and an equal opportunity to fully participate in, the services, activities, or other programs administered by Buncombe County.

- Meaningful access – Language services which result in accurate, timely, and effective communication at no cost to the individual accessing services, programs, or activities.
- Non-English Language Preference (NELP) – Used as a more person-centric and inclusive term to refer to individuals who prefer a non-English language with respect to a particular type of service, benefit, or encounter. A decision was made to use this terminology rather than the term “Limited English Proficient” (LEP) which is the term used by the Federal Government and Office of Civil Rights. The term LEP may be used in this document where resources have been quoted.
- Primary Language – An individual’s primary language is the language in which an individual most effectively communicates.
- Qualified interpreter or translator – is a trained professional who is a neutral third party with the requisite language and comprehension skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology to effectively facilitate communication between two or more parties who do not share a common language.
- Sight Translation – Oral rendering of written text into spoken language by an interpreter without changing the meaning based on a visual review of the original text or document. In ASL, the interpreter would read a document and then sign what is stated without a change in meaning.
- Strategic Languages – Languages determined to be spoken by the largest number of individuals who, based on several determining factors, frequent Buncombe County’s programs and services. The Buncombe County Language Services Policy references Strategic Languages as languages regularly encountered. The 4 Factor Analysis and Safe Harbor Threshold tools were used to identify strategic languages, as later detailed in this document.
- Translation – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- Vital Document – Paper or electronic written material that contains information that is critical for accessing a department’s program, service, activity, or is required by law. Examples of vital documents include:
 - Application forms
 - Intake forms
 - Consent forms
 - Any correspondence that requires a reply or action
 - Notices advising individuals of the availability of free language services
 - Complaint filing procedures

HOW WE BUILT IT

DEPARTMENTAL ASSESSMENT

As part of the Collaborative agenda, and at the suggestion of our community partners, Poder Emma, the team made a decision that, in lieu of distributing surveys via email, individual in-person interviews with interpreters would be coordinated with departments across the County. The purpose was to gauge the current status of resources and to speak to stakeholders to learn more about who is being served and how those whose preferred language is other than English

are being accommodated while at the same time, providing staff with a first-hand experience in working with interpreters and conversing with individuals with an NELP. Department Language Liaisons were also identified as part of this process.

The following issues emerged via those efforts:

- There was insufficient communication to departments around recognizing and utilizing available resources.
- There is currently no consistent mechanism in place to capture language need or frequency of interpretation services used in programs or departments.
- Spanish and Russian were the most frequently encountered languages, and the Vietnamese language was encountered somewhat frequently across programs.
- Some staff that were interviewed were unaware that recruiting bilingual staff was an option.

COMMUNITY CONVERSATIONS

As we create and update the Plan, it is important to connect with and receive input from community leaders who are part of the strategic language populations in our County.

Our partners from Poder Emma focus on issues affecting their neighborhoods and surrounding areas as immigrants in Buncombe County. Our connection with them in this process, as well as through Community Investment Grants, has been tremendously significant in developing new perspectives and respect for all cultures. They too were grateful for the opportunity to make their own connections with County departments through the Collaborative process, and they felt that the experience made them “more visible” and helped in portraying the great need for improved County communication around the availability of language services with, not only their community, but all community members whose preferred language is not English.

Other community leaders were interviewed by Collaborative Team members. According to staff at Lutheran Services, a nonprofit that has serviced 100 Afghan families and 303 Ukrainian individuals over the past 12 months, access to County services has not been a problem. However, the non-profit’s staff did indicate that they do have clients who would be very interested in taking part in community events, including open public meetings, but they just don’t learn about those opportunities in time to participate or they don’t know that they are available to them.

The takeaway here is that improved advertising and awareness efforts that are provided in multilingual ways and in diverse areas of the community where events are being planned and hosted are essential to ensuring increased access for all residents.

Another important point noted by a Collaborative member who is working to reach Ukrainian communities, is that when doing in-person outreach it is critical to have an individual on the team who speaks the language whose population is the target audience.

The County’s public engagement staff recently had a conversation with Ukrainian community residents. Residents’ feedback related to the ease and availability of services throughout the County was positive overall. A desire for more “in-person” interpretation services was voiced as well as a desire to be asked what language was preferred, as individuals may prefer not to receive services in Russian although some Ukrainian individuals speak both languages. We also learned from the interviewees that there are some in the community that prefer little interaction with the County due to a distrust of government in general, but they do seek services when necessary. It was suggested that the County do more to connect with the Ukrainian communities through neighborhood events and church.

And lastly, and likely most importantly, based on what we have learned, a proactive effort must be made to identify “community champions” who are embedded in communities with residents with a NELP and who are willing to work with the County in reaching individuals where they are. These champions can also provide feedback about the needs of their communities and ways we can improve our language services. The relationship between the County and community is essential for recognizing and eliminating communication barriers. As we build upon the plan, the possibility of developing training and considering compensation for community champions will be discussed.

FOUR FACTOR ANALYSIS and SAFE HARBOR GUIDELINE

Introduced originally by the Department of Justice, the four-factor analysis is a widely used means of ensuring meaningful access by individuals with an NELP, while not imposing undue financial burdens on local governments. The four-factor analysis will be utilized and revisited on an annual basis to assist departments in budgeting for and providing services. In addition, the Safe Harbor guideline provides a helpful population threshold to assist in identifying languages to consider for translation. If a particular language threshold reaches 5% (or 1000 people), vital documents will be made available in those languages. If a particular language is encountered in a department that does not meet the threshold, sight translation may be an option, but under no circumstances should the necessity of translating the vital document be ignored. Also, if a specific program or department is regularly serving those with a language preference other than those identified by the four-factor analysis, then consideration should be given to translating vital documents into that language as well.

A Look at the Four-Factor Analysis

FACTOR 1: Number & proportion of Limited English Proficient (LEP) persons in the County

1. Gather information from community organizations that serve the LEP population (e.g., public schools, refugee resettlement agencies, 911 call centers, etc.).
2. Review data from the U.S. Census Bureau, American Community Survey (ACS), and other available data to identify languages spoken.

FACTOR 2: Frequency of contact with LEP persons

3. Review programs, activities, and services provided.
4. Look at the existing customer base and employees' prior experiences with LEP persons.
3. Review programs, activities, and services and identify any that potentially could increase in frequency of LEP contact after community outreach.
4. Identify the LEP language groups with whom outreach may result in increased program contacts.

FACTOR 3: Importance of program services/activities to the LEP persons

1. Identify any compulsory activities, programs, or services.
2. Identify any activities, programs, services, or public health and safety messaging and information where denial or delays could have serious consequences.

FACTOR 4: Resources available and costs

1. Identify and inventory current language access resources.
2. Determine additional resources needed.
3. Implement cost-effective practices.

The Safe Harbor guideline is another tool that can help select strategic language groups for translation of vital documents. Safe Harbor includes the following parameters:

- 1) Five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered
- 2) If there are fewer than 50 people in a language group that meets the 5% trigger above, the recipient instead can provide translated written notice of the right to receive competent oral interpretation of vital documents, free of cost.

DEMOGRAPHICS AND IDENTIFYING STRATEGIC LANGUAGES

As we work through the four-factor analysis, demographics play an important role. Although we accumulate data from several resources, it is most important to keep our focus on who we are seeing in our programs and services, and perhaps who we are not seeing, which may be an indicator that we need to expand our outreach.

Our internal surveys confirmed what regional data already suggested: Spanish is the dominant language encountered in our community, far exceeding all others. Ukrainian and Russian also emerged as significant, though with a clear gap to the remaining languages. This finding aligns perfectly with local demographics and aligns with invoices from contracted language service providers, making Spanish, Russian, and Ukrainian natural choices for our initial strategic language focus. We can proceed with confidence knowing these languages address the most pressing communication needs within our communities. We will continue to monitor trends and emerging languages within our programs and within the communities that we serve.

Instances of utilization of outside services for Fiscal Year 2023:

Data derived from Buncombe County Health and Human Services (BCHHS) Supplier Invoices in FY23 - This data includes external departments utilizing LanguageLine or Propio services in FY23.

(Numbers do NOT include those served by in-house interpreters or bilingual staff.)

Language	Interpretation encounters and translations
Spanish	6846
Russian	573
Ukrainian	494
Pashto	78
Dari	54
Vietnamese	52
Mandarin	46
Romanian	40
Korean	32
ASL	9
Moldovan	5
Cambodian	4
Tagalog	3
Arabic	3
Portuguese	2
Swahili	2
Pohnpeian	2
Haitian Creole	2
Gujarati	2
CDI (certified Deaf Interpreter)	1

Farsi	1
Somali	1
French	1
Mam	1

County Population Data: Source: ACS5-Year Estimates Public Use Microdata Sample 2021 (PUMs 2021)
 Buncombe County (Combination of both Buncombe county locations: Southeast—Asheville City PUMA, and Northwest PUMA) (Filter: Ability to speak English—only those with numbers in the “well” to “not at all columns” are included here. However, everyone, regardless of English ability will be offered language services.) Numbers are an estimate and could vary due to data limitations, non-responses and sampling errors:

Language	Total Language Count	Very well	Well	Not well	Not at all	Sum of Well to Not at all
Spanish	13979	6832	2533	3262	1352	7147
Russian	1360	539	387	307	127	821
Romanian	723	329	137	0	257	394
Chinese	282	75	111	96	0	207
Ukrainian	505	309	73	106	17	196
Bengali	243	106	67	70	0	137
Gujarati	165	38	0	94	33	127
French	863	788	59	16	0	75
Portuguese	182	109	43	30	0	73
Cantonese	144	80	64	0	0	64
Thai	56	0	56	0	0	56
German	467	430	26	11	0	37
Greek	177	144	11	22	0	33
Italian	197	168	29	0	0	29
Bulgarian	107	89	18	0	0	18
Korean	145	135	10	0	0	10

Based on the information collected to date via the resources stated above, we have identified Spanish, Russian and Ukrainian as the strategic languages in Buncombe County as of the writing of this Plan. *This does not create an exception for serving ALL those with an NELP in a linguistically inclusive manner.*

BRINGING PROCESS INTO THE PLAN

As we collect additional information and respond to the needs of the community, it is the goal of the County to improve and evolve in our service to individuals with an NELP. With the implementation of the Language Access Plan, we look for an increased awareness across County departments of the need for and the application of Language Services as outlined in the Language Services Policy. We will begin with basic expectations with the understanding that resources are available now and will expand over time as necessary to ensure accurate, timely and effective communications for all those with an NELP.

PROVIDING NOTICE OF FREE LANGUAGE SERVICES

This Plan instructs the County to ensure that all public facing-departments provide notice that individuals with an NELP have the right to language services at no charge. As part of the recommendations collected during the Collaborative process, it was noted that posters should be visible, should be understandable in plain language and, to ensure that individuals are not hesitant to request language services, the communication must emphasize that the RIGHT TO AN INTERPRETER is prescribed by law.

At a minimum, notices in the identified strategic languages will be prominently displayed. These languages are currently identified as Spanish, Ukrainian and Russian.

In addition to posters in all public lobbies or entries where services are available, to promote this messaging, videos may be created and circulated on social media sites, websites and on other media devices where available.

The County's Communications and Public Engagement Department (CAPE) and Equity and Human Rights Office will work together with Collaborative Team members to produce appropriate posters to be displayed in public facing departments.

Another way to provide notice is using taglines on printed and electronic materials. Taglines are designed to inform individuals with an NELP about the availability of language assistance services. For example, tagline written in Spanish might say: "If you speak Spanish, language assistance services are available free of charge. Call XXX-XXX-XXXX for assistance."

Community champions, including our partner, Poder Emma, will be consulted for additional ways to disseminate this message outside of our regular communication channels.

IDENTIFYING LANGUAGE AT FIRST POINT OF CONTACT

At the first point of contact, staff will make reasonable efforts to assess the need for language assistance and notify the individual of the right to an interpreter at no charge. Staff can determine the language assistance needs if the individual self-identifies or by using "I Speak" language identification cards or posters.

The "point of service" materials, including posters and "I Speak" cards will be created by the County and disseminated to departments. Individual "I Speak" cards in strategic languages may also be created and can be provided to an individual as a means of assisting them in navigating multiple services/buildings and ensuring language services are made available to them at each location.

Staff will use telephonic interpreter services to assist in identifying the language of a caller when necessary. Existing processes must be reviewed to ensure all those with an NELP have an appropriate and efficient way to access our services/programs via telephone.

ESTABLISHING AN ONGOING METHOD TO COLLECT LANGUAGE DATA

The recommendation in this Plan is for the County to form a team, including the department Liaisons, to investigate a method to collect language data across County Departments. Electronic collection of data would be preferred, however, if there is no reliable system established to collect preferred language and use of language services electronically, a manual process will be implemented. Any system identified should be consistent across all departments. Reporting on this data will be required of the Liaisons on a to-be-determined periodic basis. Without a Countywide Language Access Coordinator at the present time, the delegation of this responsibility will be discussed with the Equity and Human Rights Office and CAPE team management. The Equity and Human Rights Office will store the data and once a process is established and data is collected and analyzed, all departments will receive the resultant information for reporting purposes as well as budgeting.

ASSIGNING RESPONSIBILITY

ROLE OF LANGUAGE LIAISONS

Prior to formalizing the Language Services Policy, each department was asked to submit the name of the individual who would serve as “Language Liaison.” This critical role will assist in the collection of data and will be tasked with ensuring that the department adheres to the Language Services policy. The Liaison will be included in all communications around implementation of this Plan and related processes. The Liaison will also be responsible for suggesting budget and reviewing invoices for interpretation/translation services for the department. They will also be responsible for obtaining quotes for translation and for working toward identifying vital documents. This role may evolve as time goes on. Collaborative team members will connect with Liaisons upon publication of the Plan to begin working on implementation.

ROLE OF COMMUNICATIONS AND PUBLIC ENGAGEMENT (CAPE) TEAM

The CAPE team will be responsible for working with Collaborative members to develop the point of service materials that are required by this Plan. The team will also begin discussions around hosting a page on the public-facing website for Language Access information. The Public Engagement members of the team, potentially in conversation with the Equity Office, will convene a process to identify community “champions” and develop ways to best connect with communities on events upon implementation of this Plan.

ROLE OF EQUITY AND HUMAN RIGHTS OFFICE

It is the intent of this document to ensure that data is available on which to inform and sustain this Plan. Because it is the people we serve that matter, we must understand the needs within our programs and services. It is recommended that the Equity and Human Rights Office play a part in the collection and review of data. A representative (or more than one individual if that is preferred) should work with CAPE and possibly Information Technology (IT) to identify a means of collecting information on individuals with NELP. It is important that we know who is using our services, how often they are being used and how we are serving individuals with language services. This could be accomplished with a simple form that documents an interaction if there is no electronic means immediately available. Whatever method is chosen, the data collected should be consistent across the County.

LANGUAGE ACCESS COORDINATOR

At the time of this writing, there is not a Countywide position dedicated to this role. Health and Human Services employs a full-time language access coordinator who not only addresses the administrative aspects of efficiently managing language services, including parsing out invoices, contracting, scheduling services, and supervising embedded interpreters, but also serves as a valuable resource in ensuring that services are provided with cultural sensitivity and humility. A Countywide position would ensure that this Plan and its goals are sustainable, and resources are centralized. A recommendation is being made that the County consider employing a Language Access Coordinator to support this endeavor and ensure compliance with policy and process. Until such time as a position is approved and created, the Language Liaisons in each department will perform the above noted functions for their individual departments.

LANGUAGE ACCESS COLLABORATIVE TEAM MEMBERS (County)

The Team will be responsible for introducing the Plan to Senior Leadership and for serving as a resource upon adoption. The Team will assist Liaisons in identifying vital documents and will support them in ensuring their departments understand expectation. They will work with HR to create trainings for Liaisons and staff. They will also work with CAPE in designing materials for dissemination and posting.

SERVING WITH OUR EXISTING RESOURCES

Interpreters and Translators

The County will use competent, trained and culturally sensitive interpreters and translators. Using unqualified interpreters, family members, children or bystanders as a means for communicating with individuals with an NELP can significantly reduce the accuracy of the interpretation, undermine privacy and confidentiality, result in conflicts of interest, and cause

interpretation errors that may exacerbate language barriers and misunderstandings. A bilingual minor, no matter how high their linguistic skill level, must never operate in the capacity of an interpreter.

Interpreters provide verbal interpretation which requires a very specific skill set. Interpreters may be dedicated staff interpreters, contracted in-person interpreters, or telephonic and video-remote interpreters.

Staff Interpreters

Currently Health and Human Services is the only County department that employs interpreters on staff whose sole responsibility is to provide interpretation and, in some cases, translation services to HHS departments. Because the State of North Carolina reimburses Health and Human Services for their staff, it is not feasible to “share” these resources with other County departments. Therefore, after the first review of data is collected uniformly across County departments, it is recommended to initiate discussions around the need for onboarding an interpreter that can serve Countywide if warranted. Consideration could be given to creating this position to serve as interpreter/translator for the County as well as Language Access Coordinator. However, time constraints and volume must be carefully considered before assigning duties related to the position.

Contracted Interpretation Services

- In Person – At this time, HHS alone has contracts with individuals who will provide in-person services. Other departments may want to consider establishing contracts for in-person services for meetings, appointments scheduled in advance, etc.
- Over-the-Phone Interpretation Services-All County departments have access to telephonic services. Information is posted on County Central, currently at this link:
<https://www.buncombecounty.org/common/documents/compliance/accessing-over-the-phone-interpretation.pdf>
- Video Remote-Video remote services are also available countywide through the telephonic service providers.

Translators

Individuals with an NELP may also need language assistance to read or complete paperwork. Vital Documents (see Vital Document Translation below) should be readily available in the strategic languages identified. Other languages may be addressed by using sight translation with a qualified interpreter. Currently the County contracts with service providers who provide translation services. Departments may not rely on bilingual staff to translate legal documents. Before submitting a document for translation, the department should determine the target audience, language, reading level, and other factors to ensure that, once translated, the content is conceptually, linguistically, and culturally accurate. It is also helpful to work directly with the communities served to ensure that translations are culturally relevant.

Bilingual Staff

As defined above and in accordance with the Buncombe County Supplemental Pay Policy, bilingual staff are staff persons employed by Buncombe County who have demonstrated proficiency in reading, writing, speaking, and/or understanding at least one other language in addition to English as authorized by their department and approved by Human Resources. Departments will consider employing or testing bilingual staff when there is a business need for non-English language skills to meet the specific needs of individuals seeking services. See the Supplemental Pay Policy here:

<https://www.buncombecounty.org/common/policies/Supplemental Pay Policy.pdf>

Important note: A bilingual staff member is a proficient speaker of two languages and may provide direct services in both languages, but without additional training, is not qualified to serve as an interpreter.

Vital Document Translation

Departments may request that members of the Language Access Collaborative assist them in identifying “vital documents” that should be translated in the County’s strategic languages. These are documents that contain information that is critical for obtaining services and/or benefits from the County and include, but are not limited to:

- Application forms;
- Consent forms;
- Complaint forms;
- Eligibility forms;
- Financial payment policies;
- Rights and responsibilities, including the availability of language access services as discussed in the Notices section;
- Intake/information forms;
- Correspondence that requires a response from the individual;
- Emergency Messaging

Some documents may be available from the publisher. For example, some State forms are available in languages other than English. It is recommended that departments consistently check with the author of the document to determine if translated options are available.

Going forward, translation costs must be considered and included when planning or developing materials. The Liaisons will be instructed to ensure there is a budget line item for language services in all future annual budgets.

LANGUAGE ACCESS TRAINING

Liaison Training

Departmental Language Liaisons should be able to respond to questions about the Plan’s content, help ensure that it is implemented, and monitor its performance within the department. The Liaison will need training and resources to accomplish the necessary tasks associated with the Language Access Plan.

Training must be developed and delivered to assist the Liaisons in becoming confident in their roles. The Collaborative Team will provide guidance around training needs and work in conjunction with HR to develop basic training in the Learning Management System.

New Employee Orientation (NEO)

New Employee Orientation can provide an opportunity to include a basic overview of the Language Access Plan and expectations around serving those with an NELP. Pointing employees to resources early on is desirable. Collaborative team members will approach the Human Resources Training Officers to discuss potential content.

All staff training

All Buncombe County employees should receive education on the diverse cultures represented in our communities and training on how to properly interact and serve individuals with an NELP. Commitment to initial and ongoing training of all employees is critical to the success and sustainability of the Plan. Once the Plan is approved, Collaborative team members will propose discussions with Human Resources and the Training Officers to ensure that a strategy for Countywide training is developed to support an understanding of and adherence to the Plan. Training should include tips for using interpreters and considerations when creating correspondence for translation, including the importance of using plain language in communications.

BUDGETING

As of the writing of this Plan, it is expected that Departments will estimate costs for providing interpretation services and translation of vital documents as part of their annual budgeting process. The Budget Office will be asked to remind departments to estimate the cost for providing language services when reviewing fiscal year budget requests.

COMPLAINTS

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 prohibit recipients of federal financial assistance, including a local government and its departments, from discriminating based on race, color, or national origin in the provision of any program or activity. The federal government interprets discrimination based upon national origin to include failure to ensure individuals with an NELP can effectively participate in, or benefit from, federally assisted programs and services.

Individuals with an NELP shall not be subjected to discrimination in the County's services and program and will be notified of their right to file a complaint. An individual may use the existing public-facing portals to file a complaint. Due to the time constraints that the Office of Civil Rights mandates around Title VI complaints, posters explaining the right to complain, the timeframe in which complaints must be made and all avenues for submitting the complaint must be prominently displayed. CAPE will create standard language for the posters based on guidance from the Collaborative Team, and they will be distributed to all departments along with forms that may be used to capture complaints. Title VI complaints will be forwarded to the County Compliance Officer to ascertain jurisdiction.

EVALUATION OF THE PLAN & CONTINUOUS IMPROVEMENT

This Plan should be evaluated and monitored on a regular basis, and at a minimum annually, to ensure that it continues to work effectively for the County.

Complaints or suggestions submitted by individuals with an NELP, community members, community language champions, and employees regarding language assistance services will be tracked and reviewed, and improvements made where appropriate. All formal non-discrimination complaints will be reported following guidance from the Civil Rights Division within the US Department of Justice.

Bilingual Staff and Language Liaisons will be periodically surveyed around the use of language services in their departments. Utilization of services must be reviewed to determine what types of services are being used and where.

A Language Access Services Assessment and Planning Tool will be developed and used in conjunction with this effort.

Additional avenues to collect feedback around quality of interpretation services as well as overall satisfaction with the interaction with the program or service will be investigated.

PRIORITIES FOR CALENDAR YEAR 2024

For calendar year 2024, priorities related to the Plan will include:

- Design and distribution of I-Speak cards
- Design and distribution of Posters (free language services/identification of language services/your right to an interpreter/complaints)
- Video posts
- Liaison affirmation
- Begin assisting departments in identifying vital documents

REFERENCES & CITATIONS

Buncombe County Language Services Policy

<https://www.buncombecounty.org/common/policies/Language%20Services%20Policy.pdf>

Buncombe County User Guides:

<https://www.buncombecounty.org/common/documents/compliance/language-identification-guide.pdf>

<https://www.buncombecounty.org/common/documents/compliance/accessing-over-the-phone-interpretation.pdf>

<https://www.buncombecounty.org/common/documents/compliance/11-tips-for-working-with-an-interpretor.pdf>

<https://www.buncombecounty.org/common/documents/compliance/interpretor-quick-reference-guide.pdf>

Building Integrated Communities <https://migration.unc.edu/building-integrated-communities/>

Language Access Collaborative <https://migration.unc.edu/language-access-collaborative/>

US Department of Justice Website <https://www.lep.gov/>

U.S Department of Health and Human Services Language Access Plan https://www.hhs.gov/sites/default/files/Language-Access-Plan-2023_0.pdf

Executive Order <https://www.lep.gov/executive-order-13166>

LEP Guidance (including Safe Harbor guidance) <https://www.justice.gov/crt/doj-final-lep-guidance-signed-6-12-02>

Title VI <https://www.justice.gov/crt/fcs/TitleVI>

Title VI Legal Manual <https://www.justice.gov/crt/book/file/1364106/download>

Title VI Complaint Process <https://www.justice.gov/crt/fcs/complaint-process>

Language justice - Language justice is an evolving framework based on the notion of respecting every individual's fundamental language rights—to be able to communicate, understand, and be understood in the language in which they prefer and feel most articulate and powerful. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10324021/>

Registry of Interpreters for the Deaf, Inc. <https://rid.org/about/> RID is the national certifying body of sign language interpreters and is a professional organization that fosters the growth of the profession and the professional growth of interpreting.