

Kentucky Highlands Investment Corporation Language Access Plan for Limited English Proficient Individuals

Section 1: Overview and Context

A. Connection to Mission

Kentucky Highlands Investment Corporation (KHIC) recognizes that providing meaningful language access is a critical function to ensure access to services provided for Limited English Proficient Individuals (LEP) by the organization.

B. Language Assessment Needs

KHIC has conducted an assessment to identify the languages spoken within the KHIC service area showing that English is the dominant language spoken at 98.1% followed by Spanish of 0.9% indicating that 0.8% speak both English and Spanish. 98.3% of the total service area population are non-Hispanic and 1.7% identified as Hispanic. The analysis of the general population and population served by KHIC revealed that KHIC should build capacity to provide meaningful access to each of these languages.

Additional strategies for building relationships with and increasing capacity to serve **Spanish** speaking community members will be outlined in this plan.

Section 2: Policies

A. General Policy Statement

It is the policy of KHIC to provide timely meaningful access for persons with LEP to company programs and activities. Personnel shall provide language assistance services to individuals with LEP if they request language assistance service. KHIC personnel will inform LEP individuals as needed that language assistance services are available and that KHIC will provide these services to them by providing access to translation services through trained interpreters for oral communication either in person or through remote services.

B. Purpose and Authority:

1. The purpose of this plan is to ensure that KHIC provides meaningful access to services to clients and potential clients limited in their English language proficiency. KHIC is committed to this plan as the appropriate response to meeting clients' needs. This plan is consistent with federal requirements. All agencies that receive federal financial assistance 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.
2. The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (Title VI) and Section 504 of the Rehabilitation Act of 1973 (Section 504) for company personnel to follow when providing services to, or interacting with, individuals who have Limited English Proficiency (LEP). Following these guidelines is essential to the success of our mission.
3. KHIC will stay informed about federal and state language access laws to ensure ongoing compliance and adjustments to the plan as needed.

C. Language Access Plan

The Language Access Plan will be distributed to staff to ensure they are knowledgeable about the language access services that are offered to clients and that these services are offered when necessary.

Section 3: Definitions

Language access: The rights of individuals with Limited English Proficiency (LEP) to receive access to federally and state funded 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: The process of rendering a spoken or signed communication from one language into another language accurately and completely (e.g., interpreting during an interview).

Translation: Involves conveying information from one language to another (e.g., translating documents).

Interpreter: Individual with training and experience with interpretation, who is a neutral third party, is experienced in interpretation techniques, specialized content areas and technical terminology and adheres to a code of ethics and confidentiality.

Vital documents or information are those that are critical for accessing federally funded services or benefits or are documents required by law. For the purposes of KHIC’s services to clients and potential clients the following are deemed vital documents (Examples may include):

1. Client intake questionnaires
2. Loan applications and disclosures
3. Loan contracts
4. Rental program contracts.

Section 4: Procedures

Point of Contact	Expectations of Staff	Tools and Resources
Phone Calls	Identify language spoken. Connect with interpreter	Language Line Bilingual Advocates Translation Aps and programs and other online tools
One-on-one Participant Meetings (Intake, applications, etc.)	Ensure that an interpreter or translation tool is available.	In-Person Interpreting Company Interpreter Confidentiality Agreement
Ongoing Services	Notify participants of the availability of language services on an ongoing basis, immediately provide access to the language line when requested.	Language Line Language-specific interpreter Online translation tools
Community-Based Services	Meet with community organizations as needed and	Language Line

	provide information about LEP plan and resources so that they may assist in informing LEP individuals of language assistance services available.	Language-specific interpreter Online translation tools
Community Events	Identify language spoken. Connect with language line to assess suitability for programs	Language line

A. Staff Compliance

KHIC staff will initiate an offer for language assistance to constituents who have difficulty communicating in English.

All personnel will inform clients that language assistance services are available to people with LEP and that KHIC will provide these services as needed.

B. Identifying Primary Language

All KHIC intake staff will attempt to identify the primary language of the person with LEP.

C. Procedures for Meaningful Language Access Provision

KHIC is committed to assuring clear, confidential, two-way communications with all clients. As part of this commitment KHIC will provide third-party trained and competent interpreters, whenever oral communication is needed. KHIC's preferred means of achieving this goal will be to employ third-party interpreters who are fluent in the major languages spoken by clients in our service area.

When KHIC staff members are collaborating directly with a client who is not fluent in the language, KHIC 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, KHIC will use Language Line, or a similar over-the-phone interpreter service or online computer assisted applications.

Children as Interpreters Policy

1. KHIC will not use minor children to interpret, to ensure confidentiality of information and accurate communication.
2. Child interpreters are prohibited.

Section 5: Notification of Language Assistance Services

Staff will have access to the KHIC Language Access plan.

Section 6: Monitoring and Staff Responsible for Monitoring

Plan to Monitor Effectiveness

KHIC will conduct periodic evaluations of its LEP plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving clients with LEP. The appointed staff will lead the evaluation with the assistance of other staff. The evaluation will include the following:

Assessment of changing demographics

Assess the number of clients requesting language services.

Section 7: Training

Staff Training

1. KHIC will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures.
2. KHIC will circulate the revised policy to all staff after its adoption if any changes are made to the policy.
3. To establish meaningful access to information and services for clients with LEP, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained in KHIC's LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with clients with LEP. Management staff will be included in this training, even if they do not interact regularly with clients with LEP, to ensure

that they fully understand the plan, so they can reinforce its importance and ensure its implementation by staff.