

## RESOLUTION NO. 2016-32

**A RESOLUTION,** establishing a Limited English Proficiency (LEP) Plan to guide the City in development of a Language Access Plan (LAP).

**WHEREAS,** in July of 2013 the United States Department of Housing and Urban Development (HUD) conducted a Fair Housing Audit; and

**WHEREAS,** in November of 2013, the Programs and Compliance Branch of Fair Housing and Equal Opportunity for HUD provided its compliance review findings; and

**WHEREAS,** the HUD Department found the City of Wenatchee in compliance with Title VI and implementing regulation at 24 C.F.R. Part 1 § 1.4; and

**WHEREAS,** in the compliance review findings it was noted that the City of Wenatchee has not conducted a Four-Factor analysis; and

**WHEREAS,** in the compliance review findings it was noted that the City of Wenatchee has no written policy for how it shall provide access to CDBG programs and benefits to persons with LEP; and

**WHEREAS,** in the compliance review findings it was noted that the City of Wenatchee does not have a written policy for determining the quality and accuracy of oral and written translation services; and

**WHEREAS,** the City of Wenatchee has recognized that language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by programs and activities and the programs and activities of federally funded sub-grantees; and

**WHEREAS**, on March 27, 2014 the City of Wenatchee entered into a Voluntary Compliance Agreement (VCA) in response to the HUD Fair Housing Audit; and

**WHEREAS**, it was recognized by HUD that the development of a LEP Plan was absent in the VCA and a request was made to amend the VCA; and

**WHEREAS**, on October 23, 2014 the City of Wenatchee City Council approved a staff recommendation to authorize the amendment to the VCA because the City had committed to develop such a plan prior to entering into the VCA; and

**WHEREAS**, the LEP Plan is developed to ensure meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in federally funded programs; and

**WHEREAS**, on April 13, 2015 the Diversity Council of the City of Wenatchee approved a recommendation to the City Council to adopt the proposed LEP Plan as a guidance document for developing a LAP for all City services.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF WENATCHEE** as follows:

#### **SECTION I**

The Limited English Proficiency (LEP) Plan as set forth in Attachment "A" attached hereto and incorporated herein as though fully set forth shall be and hereby is approved and adopted.

PASSED BY THE CITY COUNCIL OF THE CITY OF WENATCHEE,


at a regular meeting thereof, this 23 day of June, 2016.

CITY OF WENATCHEE,  
a Municipal Corporation

By:   
FRANK KUNTZ, Mayor

ATTEST:

By:   
TAMMY L. STANGER, City Clerk

APPROVED:  
By:   
STEVE D. SMITH, City Attorney



# CITY OF WENATCHEE

Department of Community and Economic Development

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## LIMITED ENGLISH PROFICIENCY (LEP) PLAN Community Development Block Grant Program

**Prepared By:**

City of Wenatchee  
Brooklyn Holton  
Housing & Community Planner  
1530 McKittrick Street  
PO Box 519 – Suite A  
Wenatchee, WA 98807

Phone: (509) 888-3258

Fax: (509) 888-3201

[www.wenatcheewa.gov](http://www.wenatcheewa.gov)

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# Table of Contents

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<b>DEFINITIONS</b>	Page 1
<b>INTRODUCTION</b>	Page 2
<b>THE LEP PLAN</b>	Page 3
<b>HUD Support</b> . . . . .	3
<b>Assistance</b> . . . . .	3
<b>Scope</b> . . . . .	3
<b>Extent of Obligation and Four-Factor Analysis</b> . . . . .	4
Factor 1 – <i>the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee</i>	4
Factor 2 – <i>the frequency with which LEP persons come in contact with programs</i>	5
Factor 3 – <i>the nature and importance of programs, activities or services provided by the City</i>	5
Factor 4 – <i>the resources available to the recipient and costs</i>	6
<b>Oral Language Services</b> . . . . .	7
Competence of Interpreters	7
Hiring Bilingual Staff and Staff Interpreters	8
Interpreters: Hiring/Contracting	8
Telephone Interpreter Line	8
Community Volunteers	8
Family Members/Friends as Interpreters	9
<b>Written language Service</b> . . . . .	9
Documents that Should be Translated	9
Languages to Translate Documents to	9
Safe Harbor	10
Competence of Translators	10
<b>Training for Staff Persons</b> . . . . .	10
<b>Monitoring Compliance, Assessing Performance and Revisions</b> . . . . .	10
<b>Complaints</b> . . . . .	11
<b>Language Access Coordinator (LAC)</b> . . . . .	11

## **Definitions**

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Back Translation: When a document is translated and a second, independent translator translated the document back to English to check that the appropriate meaning has been conveyed.

Federal Financial Assistance: Includes funding for grants, training, use of equipment, donations of surplus property, and other assistance.

Four Factor Analysis: An individualized assessment of four factors designed to be a flexible and fact-dependent standard that balances the need to ensure meaningful access while not imposing undue burdens on small business, small local governments, or small nonprofit entities.

Interpretation: The act of listening to something in one language (source) and orally translating it into another (target). Interpretation is in person or via a telephone interpretation service ranging from on-site interpreters for critical services provided to a high volume of LEP persons through commercially available telephonic interpretation services.

Limited English Proficiency (LEP) Person: Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such person(s) may be entitled, at no cost to them, to language assistance with respect to a particular type of service, benefit or encounter.

Language Access Plan (LAP): An implementation plan developed after the four-factor analysis to decide what language assistance services are appropriate to address identified needs of the LEP populations served.

“Safe Harbor”: If a recipient provides written translations (a) of vital documents for each eligible LEP language group that constitute 5 percent or 1,000, whichever is less of the population of persons eligible to be served or likely to be affected or encountered; or (b) if there are fewer than 50 persons in a language group that reach the 5 percent trigger from (a) then such actions will be considered strong evidence of compliance with the recipient’s written-translation obligations.

*Note: These provisions apply to the translation of written documents only.*

Timely: Language assistance should be provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person. *Note: there is no single definition that is applicable to all types of interactions at all times by all types of recipients.*

Translation: The replacement of a written text from one language (source) into an equivalent written text in the target language. Written translation can range from translation of an entire document to translation of a short description of the document.

Vital Document: Any document that contains information that is critical for obtaining or contain the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include but are not limited to applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notes that require a response from the participant or beneficiary, legal notices and notices advising LEP persons the availability of free language services.

## **Introduction**

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This Limited English Proficiency Plan (LEP Plan) addresses Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI regulations. Additionally requirements are outlined in Executive Order 13166 and directives from the U.S. Department of Justice and U.S. Department of Transportation. HUD's regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development – Effectuation of Title VI of the Civil Rights Act of 1964", requires all recipients of federal financing assistance from HUD to provide meaningful access to LEP persons; an individual that has a limited ability to read, write, speak or understand English.

The City of Wenatchee (City) recognizes that language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by our programs and activities and the programs and activities of our federally funded sub grantees. As a recipient of federal financial assistance, the City should work to follow the compliance standards set forth in this guidance document to ensure the programs and activities that are normally provided in English are accessible to LEP persons and thus do not discriminate on the aforementioned basis.

The City acknowledges the responsibility to reduce language barriers that can preclude meaningful access by LEP persons by pursuing a more comprehensive approach beyond the availability of ESL classes as this does not solely obviate the statutory and regulatory requirement to provide meaningful access.

The Community Development Block Grant (CDBG) program at the City is administered by the Community and Economic Development (C&ED) Department. Although the C&ED Department does not directly operate or manage any housing assistance programs, it does support agencies and organizations throughout Chelan County that provide this service. In addition to the support provided by the C&ED Department to county-wide partners, the City recognizes the importance of appropriate training for staff city-wide. Considering all involved, the City co-designates the Executive Services Director and Human Resource Director to be responsible for managing the LEP Plan. Any sub grantees used for homeownership assistance programs will be responsible for compliance with this LEP Plan as aforementioned. It is the intent of the City to achieve a balance that ensures meaningful access by LEP persons to programs and services while not incurring undue burdens on City resources. As reasonable, the City shall oversee the implementation of the LEP Plan and Policies, coordinate and facilitate necessary delivery of LEP language services, ensure that involved staff receive appropriate training on LEP Plan policies and procedures and direct the ongoing monitoring and periodic assessment of the LEP Plan and Policy's effectiveness.

## **The LEP Plan**

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### **HUD Support:**

HUD is working to balance the principles of ensuring that federally assisted programs do not leave anyone behind simply because they face challenges communicating in English while finding constructive methods to reduce the costs of LEP requirements.

- HUD plans to continue to provide assistance and guidance on cost reduction
- HUD plans to work with representatives from HUD recipients and LEP persons to identify and share model plans, examples of best practices and cost-saving approaches
- HUD intends to explore how language assistance measures, resources, and cost-containment approaches developed with respect to its own federally conducted programs and activities can be effectively shared or otherwise made available to recipients.
- A Website <http://www.lep.gov> has been developed to assist in disseminating this information to recipients, federal agencies and the communities being served

### **Assistance:**

The City shall respond to requests for language assistance in the manner described in this plan, which includes:

- A mechanism to provide ongoing assessment of needs, programs, and activities of target audiences, along with the organization's capacity to meet these needs using the LEP Plan
- Translation of vital written materials in languages other than English where there is a significant number of percentage of persons with limited English proficiency
- Oral language assistance to LEP persons for programs, where such assistance is requested an/or anticipated
- Identified procedures and a designated representative from the City responsible for implementing activities related to the LEP Plan
- Notification of the availability of free language services to those persons in the target audience, through oral and written notice in the relevant primary language assistance activities
- Staff training on policies and procedures of the organization's language assistance activities

### **Scope:**

The LEP Plan applies to individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English. For example, the scope of the plan would not extend to the following:

- Hearing or visual impairments requiring Sign language interpretation and Braille text are accommodations provided under the Americans with Disabilities Act.
- Illiteracy, generally – The inability to speak, read, or write English and conditions that may trigger language assistance under the Title VI are distinguished with a key factor. A LEP person cannot speak, read or write English and primarily speaks, read, or writes in a language other than English.



**Extent of Obligation & Four-Factor Analysis:**

The Four-Factor Analysis is a starting point for the City to take reasonable steps to ensure meaningful access to programs and activities by LEP persons by looking at following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency with which LEP persons come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people’s lives; and
4. The resources available to the grantee/recipient and costs.

The Four-Factor Analysis may show that different language assistance measures are sufficient for the different types of programs or activities provided by the City of Wenatchee and therefore reasonable steps to ensure meaningful access to LEP persons may vary.

*FACTOR 1- the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.*

The first part of the City’s self-assessment involves data on the number of LEP persons eligible to be served, likely to be served, or likely to be encountered by the City through programs, services or activities.

In order to determine the number and proportion of potential LEP persons, relevant demographic information was collected utilizing the U.S. Census Bureau, 2010-2014 American Community Survey (ACS) 5-Year Estimates.

According to the ACS 5-Year Estimate, the population for the City of Wenatchee is around 29,822. (The Office of Financial Management estimates the population to be 33,230) Utilizing the information in Table A, it is determined that 28% of the population speak a language other than English at home. This portion of the population is represented by the following: Spanish 26%, Indo-European 0.9%, Asian/Pacific Island 0.4% and Other 0.7%.

Of the individuals that speak a language other than English, 10.6% speak less than “very well” and would be considered to have Limited English Proficiency. Spanish-speaking individuals make up 93.7% of persons that could potentially qualify as having a Limited English Proficiency and will be the target audience for materials and outreach.

**Table A:** Ability to speak English by language spoken at home other than English by age for the population 5 years and over.

Language		Spanish			Indo-European			Asian/Pacific Island			Other			TOTAL
Ability	Age	5-7	18-64	65+	5-7	18-64	65+	5-7	18-64	65+	5-7	18-64	65+	
Very Well		2041	2607	44	0	168	28	0	26	2	38	150	0	5104
Well		288	822	120	0	33	0	0	2	0	0	11	0	1276
Not Well		59	1070	3	16	21	0	24	66	15	0	11	0	1285
Not at All		15	575	16	0	0	0	0	0	0	0	0	0	606

<b>TOTAL</b>	2403	5074	183	16	222	28	24	94	17	38	172	0	<b>8271</b>
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FACTOR 2- *The frequency with which LEP persons come in contact with programs*

The second part of the City’s self-assessment includes identifying which program or service an LEP individual may access on a daily basis as this will increase our duty to accommodate than if access to programs or services are unpredictable or infrequent.

Data that provides the frequency at which the City has contact with LEP individuals has not been collected in the past. Questions that are brought to the City are unpredictable and infrequent and can fall under a wide range of topics. Inquiries related to the CDBG program are generally expressed at public meetings held in preparation for the Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER) or projects requiring a public hearing by the CDBG or City of Wenatchee guidelines. The City includes the following footnote in public meeting notices and official documents: *In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Mayor’s office at (509) 888-6204 (TTY 711). Notification 72 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the meeting (28 CFR 35.102-35.104 ADA Title 1).*

During a two week observation period from Monday, March 9, 2015 to Friday, March 20, 2015 a survey, Table B, was conducted by the front desk staff at City Hall. This method is an example of how the City can measure frequency with programs and services.

<b>Walk-in Customer</b>	29
<b>Customer Call</b>	17
<b>Information Request</b>	1
<b>Customer E-mail</b>	0

**Table B:** Mode of communication by frequency of Non-English customers at City Hall during a two week survey period.

In conjunction with identifying LEP persons, the City can compile frequency information in a more extensive manner to ensure adequate resources are available. Resources may include, but are not limited to, bilingual staff or assistance, special accommodation notices in newspapers, LEP-specific notices on agendas, case-by-case response, website translation options, Spanish language brochures or available “I Speak” cards.

FACTOR 3 – *the nature and importance of programs, activities or services provided by the City*

The third part of the City’s self-assessment requires a review of the importance of activities, information, services or programs that are offered. Determining the need of language service can be compared to the possible consequences if it is not available. Identifying whether or not denial or delay of access have a serious or even life-threatening implication for the LEP individual will indicate a greater need for language services. A program’s importance can also be analyzed by any forms, applications, hearings or other activities required in order to participate.

The City recognizes the importance and benefit of outreach and communication with LEP individuals during planning, monitoring and implementation of projects, programs and plans.

Within the range of offerings, some are more important than others. While it is the City's intent to provide meaningful access to all participants and eligible persons, the availability of resources may limit the provision of language services in some instances. Information about and an understanding of all high priority offerings should be effectively communicated to all persons affected. Due to the varying levels of importance the City shall develop a list of all offerings and a matrix to show the relative importance of each. Based on analysis, this matrix will indicate the appropriate delivery of language services to LEP persons.

Oral interpretation at public meetings, events and other activities shall continue at no charge provided that the need is identified by the participant(s) at least seventy-two (72) hours prior. Written communication advertising such events shall provide instructions for requesting interpretation services.

All legal notices and publications intended to inform the public of meetings, the availability of documents, or opportunities for public comment shall be published in English and Spanish in accordance with pre-determined relative importance. In addition to the legal notices published in an official newspaper, notices and public service announcements shall be transmitted to the local Spanish language paper and radio stations. These shall include a notification that translation services and/or documents in an alternate format will be made available upon request.

Intake areas and other entry points regarding the availability of free language services to those person in the target audience should be posted.

Subrecipients are often utilized and will be required to comply and provide meaningful access to all participants and eligible persons as availability of resources allows.

#### *FACTOR 4 – the resources available to the recipient and costs*

The fourth and final part of the City's self-assessment looks at the steps that should be taken and how resources and costs impact the level of language service available to be provided.

Technological advances, sharing language assistance materials and services, advocacy groups, federal grant agencies and reasonable business practices can help to reduce issues encountered related to limited resources and high costs. The City recognizes the responsibility to carefully explore the most cost-effective means of delivering language services before limiting them due to resource limitations.

Language services can be provided through oral interpretation (interpretation) in person or via telephone service or through written translation (translation). The City recognizes the value of having interpretation and translation services and will evaluate when services should be made available on an expedited basis or referred to partnering office. Hiring of bilingual staff has allowed oral interpreters to be available immediately. Educational opportunities for non-bilingual staff that communicate on a regular basis with LEP individuals is something to highly consider.

Data collected shall be specific enough to inform staff as to the variety of language groups for whom interpretation and translation services are needed. The City should provide language services to LEP persons by a variety of methods based upon the relative numbers of such persons

and the frequency of contacts or anticipated contacts. Reasonable steps should be taken to accomplish this; at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services shall be evaluated and appropriate changes made. There will be times that the cost is indeterminable until the specific project or program is identified.

RESOURCES	COST	APPLICATION
Translation and Interpretation Services	\$0 - \$75/page \$0.25/word \$50 - \$75/hour <i>*estimate</i>	Spanish translation for City of Wenatchee official forms, documents, contracts, etc.  In-house bilingual staff members can provide basic translation
Website Portal	Indeterminable	City of Wenatchee website <a href="http://www.wenatchee.wa.gov">www.wenatchee.wa.gov</a> has translation capabilities available
Notice	\$75extra/notice <i>*minimum estimate</i>	Notification of the availability of free language services to LEP persons can be included within meeting notices advertised in the local English and Spanish papers.  Materials on the website and on appropriate materials developed for meetings, events and public hearing can include notice of available interpretation/translation services
“I Speak” Cards	Printing Costs <i>Variable</i>	“I Speak” language cards can be made available at City of Wenatchee front desk locations, meetings, hearings and events to identify LEP individuals that are unknown in advance.  This need require the monitoring of changing demographics in the community to anticipate future needs.
Phone System	\$1.00/minute	Language series can include a contract with a language service or equivalent service provider for on-call translation services
Bilingual Staff	Indeterminable	Staff are available during business hours for interpretation/translation services. For after hours, advance notice must be made for accommodation
Previously translated material	Indeterminable	Public documents, fliers, brochures, etc. have been made available on the website for LEP individuals. Valuable papers can be reviewed to ensure bilingual copies are available.

### Oral Language Services

#### 1. Competence of Interpreters

The City recognizes the responsibility to ensure competency of the language service provider no matter the strategy being utilized. It shall be ensured that interpreters:

- a. Demonstrate proficiency in and ability to communicate information accurately in both English and in the other language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation);
- b. Have knowledge in both languages of any specialized terms or concepts peculiar to the entity’s program or activity and of any particularized vocabulary and phraseology used by the LEP individual(s);

- c. Understand and follow confidentiality and impartiality rules to the same extent that staff for whom they are interpreting and/or to the extent their position requires; and
- d. Understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles (particularly in court, administrative hearings, or law enforcement contexts).

When no formal certification assessments currently exist for a language, other qualifications to consider are qualified by a state or federal court, level of experience and participation in professional trainings and activities, demonstrated knowledge of interpreter ethics, etc.

## 2. *Hiring Bilingual Staff and Staff Interpreters*

Having bilingual persons on staff offers one of the best, and often most economical, options. It is important to keep in mind that being bilingual does not automatically mean that a person has the ability to interpret. Also, there may be times when the role of the bilingual employee may conflict with the role of an interpreter. Management strategies that include appropriate adjustments in assignments and protocols for using bilingual staff can ensure that proper utilization of bilingual staff.

## 3. *Interpreters: Hiring/Contracting*

Where there is a frequent need for interpreting services it may be necessary and reasonable to provide on-site interpreters. Depending on the facts, this may be the most helpful to provide accurate and meaningful communication with LEP individuals. Contracting may be a more cost-effective approach when there is no regular need for a particular language skill. It can be cost-effective to contract with community-based organizations and mutual assistance associations that provide interpretation services to certain languages already.

## 4. *Telephone Interpreter Line*

When the mode of communicating with a LEP individual is over the phone, telephone interpreter service lines can offer speedy interpreting assistance in many different languages. Although useful in many situations, it is important to ensure the competency of the interpreter regarding technical or legal terms that may be important parts of the conversation. Video conferencing can help resolve the issue of lost nuances and non-verbal communication where necessary. When using telephonic interpreters be sure to provide adequate opportunity to review any documents that will be discussed and any logistical problems that should be addressed.

## 5. *Community Volunteers*

Under appropriate circumstances, providing supplemental language assistance through coordinated community volunteers may be cost-effective. It is best to use volunteers trained in the information or services of the program that have been identified as competent in the skill of interpreting and are knowledgeable about applicable confidentiality and impartiality rules. Developing a formal arrangement with a community-based organization can help ensure services are more regularly available.

6. *Family Members/Friends as Interpreters*

An LEP individual may feel more comfortable when a family or friend acts as an interpreter although the City does not plan to rely on informal interpreters to provide meaningful access to important programs and activities. Where desired, a LEP individual will be permitted to use, at their own expense, an interpreter of their own choosing in place of or as a supplement to the free language services expressly offered. With proper planning and implementation the City should be able to avoid most exigent circumstances that would necessitate temporary use of interpreters not identified by the City. In many cases family members (especially children) or friends are not competent to provide quality and accurate interpretations. Confidentiality, privacy or conflict-of-interest issues (disclosed or undisclosed) may arise if a LEP individual is uncomfortable revealing or describing personal information. If it is determined that language services are not necessary and a LEP individual uses their own informal interpreter, the City should consider whether a record of that choice of assistance is appropriate to document. Extra caution should always be used when the LEP individual chooses to use a minor by ensuring that the choice is voluntary, the LEP individual is aware of the possible problems and that the LEP individual knows that the City could provide a competent interpreter at no cost to the LEP person.

**Written Language Service**

The City recognizes that many LEP individuals may not be able to read their native language and that the availability of oral interpretation is always advantageous.

1. *Documents that Should be Translated*

The City can apply the four-factor analysis to determine if an effective LAP for particular programs or projects include the translation of vital or generic widely used written materials. Where appropriate, it can be beneficial to create a plan for consistently determining, over time and across various activities, what documents are vital to the meaningful access of the LEP populations the City is serving. Regular review can help determine whether certain critical outreach materials should be translated. Translation of materials can be more effective when done in tandem with other outreach methods such as ethnic media, schools, grassroots, faith-based and community organizations. If a document sent out to the general public includes both vital and non-vital information, providing guidance in the appropriate language where a LEP individual might obtain an interpretation or translation of the document is important.

2. *Languages to Translate Documents to*

Utilizing the four-factor analysis, the City shall determine on a case-by-case basis which documents will be translated by looking at the totality of the circumstances. Translation is a one-time expense that must be weighed against the estimated lifespan of the document. It is unrealistic to translate all written materials as such an undertaking would incur unreasonable costs and require substantial resources. Identifying languages that are frequently encountered and those less commonly encountered can help the City determine which vital documents should be translated into which language.

### 3. *Safe Harbor*

Although safe harbor circumstances provide strong evidence of compliance with written translation obligations, the failure to provide written translations under safe harbor circumstances does not mean noncompliance. Rather, the circumstances provide a common starting point for recipients to consider the importance of the service, benefit or activity involved; the nature of the information sought; and whether the number or proportion of LEP individuals served call for written translations.

### 4. *Competence of Translators*

The skill of translating is very different from the skill of interpreting and the City shall seek competent translators of written documents. Where certification or accreditation is not possible or necessary, a particular level of membership in a professional translation association can provide an indicator of professionalism. Translation can be checked by having a second independent translator check the work or have them back translate. Understanding the expected reading level of the audience while also having fundamental knowledge about vocabulary and phraseology is imperative because sometimes a translator will need to provide appropriate alternatives if there is not a direct translation. For vocabulary and phraseology that does not have a direct translation, the City can work to develop a consistent and appropriate set of descriptions for future use. Consistency will help with the effectiveness and cost of translating terms of art, legal or other technical concepts. This can include partnering with agencies and organizations to ensure common vocabulary and phraseology. Written translations tend to be permanent and the City recognizes the responsibility to seek quality and accuracy in translations for meaningful access by LEP individuals.

### **Training for Staff Persons**

The City should provide training to its staff regarding its LEP Plan. Efforts will be made to develop a relevant LAP that shall then be provided to the necessary departments. A determination of the frequency of staff encounters with LEP individuals should dictate the level of detail of this training. All employees who are likely to have contact with LEP individuals should be trained to assure that they know the LEP Plan, that they work effectively with in-person and telephone interpreters, and they understand the dynamics of interpretation among LEP providers and interpreters. Staff having the greatest contact should be trained first to ensure effectiveness of the LAP. Those staff having the least amount of contact with LEP individuals should, at a minimum, be trained to be fully aware of the LEP Plan so that they may reinforce its importance and effectively support implementation of the LAP by other staff.

LEP training should be part of the orientation for all new employees who work with LEP individuals. The City shall document training and orientations on the LEP Plan for new employees with the level of detail appropriate to their assigned job responsibilities. On-going employees shall receive a one-time orientation on the LEP Plan which shall be documented.

### **Monitoring Compliance, Assessing Performance and Revisions**

The City should monitor implementation of the LAP on an ongoing basis, making revisions to policies and procedures as may be required periodically. An effective plan has clear goals, makes management accountable and provides opportunity for community input and planning

throughout the process. At a minimum, the City shall review the overall effectiveness of its LEP Plan. Considerations of the following information as well as any other factors that may become appropriate may be included during a review:

1. Changes in demographics including new language groups and changes in the proportion of existing language groups, types of services and other needs.
2. Frequency of encounters with LEP individuals
3. Nature and importance of activities to LEP individuals
4. Availability of resources and costs imposed
5. Adequacy of current plan meeting needs of LEP individuals
6. Understanding by the staff of the LAP and how to implement it
7. Availability and viability of identified sources

### **Complaints:**

For persons included in a regularly encountered LEP group, written notification of the opportunity to file a discrimination complaint in accordance with federal regulations will be provided. For infrequently encountered groups, LEP persons may be advised orally of the opportunity to file a discrimination complaint pursuant to federal regulations.

### **Language Access Coordinator**

The Language Access Coordinator (LAC) helps to ensure that the City adheres to its LAP, policy directives and procedures to provide meaningful access to LEP individuals. Responsibilities include coordinating and facilitating delivery of related services, staff training on the plan's policies and procedures and ongoing monitoring and assessment of the plan's effectiveness. The City of Wenatchee co-designates the Executive Services Director and the Human Resource Director as the LAC's responsible for oversight and implementation of the LEP Plan.

Overseeing the LAC's will be the Mayor of the City of Wenatchee.

City of Wenatchee  
Mayor/Council Department  
Executive Services Director  
129 South Chelan Avenue  
Wenatchee, WA 98801  
[awilliams@wenatcheewa.gov](mailto:awilliams@wenatcheewa.gov)  
Phone: 509-888-6216 ex. 3616  
Fax: 509-888-3201

City of Wenatchee  
Human Resource Department  
Director  
129 South Chelan Avenue  
Wenatchee, WA 98801  
[kpage@wenatcheewa.gov](mailto:kpage@wenatcheewa.gov)  
Phone: 509-888-6203 ex. 3603  
Fax: 509-888-3201