

Policies for Interpreting

Interpreters must be offered for free, upon request.

The city of Minneapolis provides interpreter services, free of charge, to people who speak little or no English if needed to access city services.

If an Access and Outreach Specialist cannot be reached, or is unavailable, to provide interpreter services in person or by telephone, the department should use a language service provider that the City has a contract with.

Public meetings will have interpreters available, if needed.

Public meeting notices should include a line advising LEP individuals that interpreters will be provided upon request if there is at least 5 business days notice.

The city will use competent, trained and culturally sensitive interpreters.

Interpretation is more than simply being able to speak two languages. Interpreters are trained professionals who abide by a code of ethics and professional practice standards.

City interpreters or city employees who provide interpreting services must demonstrate competence.

A competent interpreter should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of interpreting;
- Proficiency in English and the other language, as documented in an objective language proficiency test;
- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated interpreting encounter;
- Fundamental knowledge in both languages of any specialized terms or concepts related to the organization's program or activity; and
- Sensitivity to the LEP person's culture.

Competency standards apply to all interpreters used to deliver city services.

Interpreting services for the city will be performed by trained, professional interpreters, whether city staff, contractors, or telephone interpreters. City staff who works as interpreters must demonstrate competence as defined above. With contract interpreters and telephone interpreters, competency is assumed, but contracting agencies should demonstrate how competency is assessed.

Volunteers should not interpret unless shown to be competent, according to city standards.

Volunteers, friends, or family members whose competence has not been assessed should not be relied upon. The use of untrained volunteers exposes the city to liability, based on its legal obligation to provide competent interpreter services.

Children may not interpret.

For reasons of accuracy, confidentiality and family dynamics, minor children (under 18) may not interpret for family members or other LEP individuals. (This policy does not apply in serious emergency cases, when a minor child is the only available potential interpreter).

Volunteers may interpret for LEP voters.

According to election law, “a voter in need of assistance may obtain the assistance of any individual the voter chooses, except for the voter’s employer, union agent, or a candidate for election...” For a full explanation of assistance to LEP voters, see *MN Statute 204C.15*—assistance to voters.

Individuals may use their own adult volunteer interpreters under some limited circumstances. Staff should never urge or require those who speak little or no English to provide their own interpreter. However, individuals may use their own interpreter if they waive their right to one provided by the city, and if the potential interpreter has demonstrated competence. In situations where the effectiveness of services is compromised or the LEP person’s privacy may be violated, an interpreter should be used.

Individuals using volunteer interpreters should sign a waiver form.

Individuals waiving the right to an interpreter provided by the city may be asked to sign a waiver form in their own language. For a sample waiver form, see *Waiver of Interpreter Services* online at CityTalk. Click on “Work Tools” and then on “Language and Translation Services”.

Interpreting must be timely.

Access to interpreting services in all city departments must be timely. No one can be denied access to services based on the lack of interpreter availability.

Procedures for Interpreting

How to provide interpreting

Interpreting can be provided in a variety of ways (in descending order of preference):

- By bilingual staff trained in interpreting;
- By Access and Outreach Specialists or other city staff interpreters;
- By telephonic interpretation with language service vendors
- By contract or free-lance professional interpreters;
- By bilingual department staff; and
- By competent volunteer interpreters.

How to access a city interpreter through the Access and Outreach Division

1. Identify which language the person speaks. This can be done by asking the person what languages she/he speaks, or (if the individual is onsite and not on the phone) ask him or her to point to their language on a Language Identification Card.
2. Let the person know that you will arrange for an interpreter.
3. Call the Access and Outreach Division, within the City’s Neighborhood and Community Relations Department. Access and Outreach Division currently has Spanish, Somali, Oromo, Amharic, Hmong and American Sign Language staff who may be able to provide interpreter services and signing for your department.
 - Spanish Line: 612-673-2700
 - Hmong Line: 612-673-2800
 - TTY Line: 612-673-2157
 - Somali, Oromo and Amharic Line: 612-673-3500
 - Access and Outreach Manager: 612-673-2162 or email Ahmed.Muhumud@ci.minneapolis.mn.us

The Access and Outreach Division cannot guarantee that an interpreter will be available when you call. If the matter is not urgent, please leave a message and your call will be returned. If the matter is urgent and you need an interpreter immediately or if interpreter services are required for a language other than Spanish, Somali, Oromo, Amharic, Hmong, or American Sign Language, you may use a language service provider that the City has a contract with. *Note: Departments are responsible for covering the cost of services provided by these language service provider vendors.*

How to access a telephone interpreter

Follow the steps above to identify the language needed to request for an interpreter. If staff is not available and you need an interpreter immediately, contact the city's contracted telephone interpreting vendor, Certified Languages International (CLI). CLI provides 24/7 telephone-based interpreter (spoken) services in many languages. The phone number is: 1-888-338-5508. If you would like more information about CLI, check their website at: www.certifiedlanguages.com.

An access code is required to use this service. Departments will be charged for the service. Please check with your supervisor for your department's access code. If you need assistance or have any questions regarding access codes, please contact Ahmed Muhumud at (612) 673-2162 or email ahmed.muhumud@ci.minneapolis.mn.us.

Policies for Translation

Translation of vital documents must be offered, for free.

The city of Minneapolis must provide a translation of vital documents, free of charge, to people who speak little or no English if needed to access city services. City departments may want to work with Access and Outreach for suggestions regarding which documents would be vital or helpful to have translated.

Vital documents must be in primary languages.

"Vital" documents must be available in the city's primary language or readily translated by an interpreter, upon request. Not all documents can be translated and available in every language. City departments must simply have the capacity to translate documents on request, in a timely fashion. (For further discussion and guidance on which documents should be translated, and when, refer to <http://www.lep.gov>).

The city will use competent, trained, and culturally sensitive translators.

Translation is more than simply being able to read and write in two languages. Translators are trained professional who abide by a code of ethics and professional practice standards.

Vital documents are translated by competent staff, contract translators or interpreters, including telephone interpreters.

Materials translated by an outside source must be evaluated for accuracy of translation.

City translators must demonstrate competence.

A competent translator should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of translation;
- Proficiency in English and the other language, as documented in an objective language proficiency test;

- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated translation job; and
- Fundamental knowledge in both languages of any specialized terms or concepts;
- With approved contract translators, competency is assumed, but a demonstration of competency should be requested.

Volunteers should not translate materials unless shown to be competent, according to city standards.

Volunteers, friends, or family members whose competence has not been assessed should not be relied upon. The use of untrained volunteers exposed the city to liability, based on its legal obligation to provide competent translation services.

Children may not provide translations.

For reasons of accuracy, confidentiality and family dynamics, minor children (under 18) should not translate vital documents for family members or other LEP individuals. (This policy does not apply in *serious* emergency cases, when a minor child is the only available potential translator).

Individuals may use their own adult volunteer translators under some limited circumstances.

Staff should never urge or require those who speak little or no English to provide their own translator. However, individuals may use their own translator if they waive their right to one provided by the city. If the effectiveness of service is comprised or the LEP person's privacy may be violated, a city translator should be used.

Individuals using volunteer translators should sign a waiver form.

Individuals waiving the right to translation may be asked to sign a waiver form in their own language. After working through an interpreter and ensuring that the individual waiving services can read in his or her preferred language, use the *Waiver of Interpreter Services* online at CityTalk. Under Quick Links, this is to the left hand side of CityTalk webpage, click "Language and Translation Services".

Translation must be timely.

Access to translated materials in all city departments must be timely. No one can be denied access to services based on the lack of translated material or documents.

Procedures for Translation

How to provide translations

Translation can be provided in a variety of ways;

- By bilingual staff trained in translating;
- By Access and Outreach Specialists or other city staff translators;
- By contract or free-lance professional translators;
- By bilingual department staff; and
- By competent volunteer translators.

How to access translation services provided by a telephone interpreter

If staff is not available and you need an interpreter immediately to provide on-site translation of a document, contact the city's contracted telephone interpreting vendor. For online instructions on

How to *access telephone interpreting services*, go to CityTalk. Under Quick Links, this is to the left hand side of CityTalk webpage, click "Language and Translation Services".

The city of Minneapolis has contracts with several vendors to provide written translation of documents. Your department will be charged for using these services.

If you have frequent contact with individuals who speak limited or no English, please contact Ahmed Muhumud at 612-673-2162 or email him, ahmed.muhumud@ci.minneapolis.mn.us to discuss how to best handle your translation needs.

6. Staffing and Training

This chapter includes:

- Policies for staffing
- Procedures for staffing
- Training

Policies for Staffing

Staffing decisions should be based on the city's customer service needs, including LEP service needs.

When individuals are hired for positions in which they interact with LEP residents, language skills may be a relevant job qualification.

Hiring to meet LEP needs can be done in three ways by:

1. Creating new positions for and hiring full-time or part-time interpreters or translators within departments in standard hiring processes;
2. Reclassifying an existing position. If the need for interpretation and translation services is high and is expected to be long-term, departments may request Human Resources study a vacant position to determine if a reclassification is necessary. This request must be made before filling a vacant position;
3. Making bilingual or multilingual capability a "highly desirable" qualification in job announcements.

If bilingual or multilingual skills are included on the job announcement, LEP service capabilities should be assessed as part of the selection process. Assessment may include:

- Informal testing of language proficiency or interpreting/translation ability (*permissible when the skill is a highly desirable qualification*)
- Formal testing of language proficiency or interpreting/translation ability (*recommended, if the skill is a requirement of the job*)
- Certification, transcripts, diplomas or other evidence of language proficiency in English or other language (*shortly encouraged as evidence of skill level for either option*)
- Certification, transcripts, diplomas or other evidence of training in interpreting and/or translation (*strongly encouraged as evidence of skill level for either option*)

Compensation for an employee who provides interpretation and translation services will depend on whether the service is an essential function of the job.

If interpreting/translation are an essential job function of the position, the position should be classified appropriately, ensuring the compensation is consistent with legal guidelines.

If interpreting and translating skills are desirable qualifications, but not an essential function of the job, department management may, under many circumstances, require a qualified employee to perform this function within the category of "other duties as assigned". These duties should not exceed 40% of the employee's work time.

The pay scale for non-exempt employees is defined by labor contract and departmental policies relating to overtime. Compensating exempt employee falls within the administrative leave language found in labor agreements and the Exempt Employment under the Fair Labor Standards (FLSA) Policy. Both non-exempt and exempt employees may be required to provide these services if there is a business need. Any "additional" benefit (overtime or administrative leave) would be given in accordance with those provisions.

Procedures for Staffing

How to amend a job announcement to include bilingual skills

When bilingual skills are required for a position, work with your department's Human Resources Generalist (HRG) to request a job study of a vacant position. Once a determination is made on the job classification, it may be necessary to amend the job announcement. Work with your department's HRG team to make revisions.

When it is determined that these skills are a highly desirable qualification, work with your Department's HRG team to make revisions.

How to informally test for language proficiency (*permissible when language skill is a highly desirable qualification*)

Include a native speaker of the desired language in the interview process, as one of the interviewers. Conduct part of the department interview in the desired language. If the job includes significant writing duties, ask for a writing sample in both languages.

Note: there are important distinctions in the syntax and vocabulary of any language, depending where a speaker is from, their education level, and their social class. Choose the native speaker interviewer with this in mind.

How to formally assess language proficiency (recommended if interpreting and translation skills are a required qualification and are part of the position duties.)

All individuals hired to perform interpreting services should, at minimum, be able to demonstrate oral proficiency in each language (English and other language) through a test, such as the one developed by the American Council of Teachers of Foreign Languages (ACTFL). For more information on the ACTFL proficiency test, visit the Councils website, www.actfl.org. Note that there is no ACTFL proficiency test for the Somali language.

It is important to also assess a candidates' English proficiency as well as the other desired language. Currently, English proficiency can be demonstrated through the written exam (always in English and at a level similar to what would be used on the job); the oral exam process (communication skills typically measured); and the department interview process.

How to assess an applicant's ability to serve as an interpreter and/or translator

All individuals hired to deliver interpreting or translation services should, at minimum, demonstrate oral proficiency in each language (as spelled out above) and demonstrate familiarity with and comprehension of ethical standards for interpreters.

All individuals hired to perform interpreting and translation services full time should complete basic courses in interpreter training, such as those offered through the University of Minnesota and community colleges.

Training

Enterprise training will be coordinated through Human Resources Training and Development and the Access and Outreach Manager and/or Neighborhood and Community Relations Department as part of New Employee Orientation.

The Access and Outreach Manager will work in partnership with Training and Development to design and provide training and information on the LEP Plan and available city support options.

Departments are responsible for ensuring all employees understand the LEP Plan and its provisions.

The Neighborhood and Community Relations Department and Training and Development will partner to create training guidelines, information and tools which will be available to departments. The Neighborhood and Community Relations Department can partner with departments to create and deliver training and information on the LEP Plan.

7. Carrying Out the Plan

The chapter includes:

- Implementation timeline
- Monitoring and updating the plan
- Role of the Department LEP Liaison
- Role of the Access and Outreach Manager
- Resolving complaints about LEP services

Monitoring and Updating the Plan

Minneapolis' LEP is updated annually. Updating is the responsibility of the Access and Outreach Manager. The evaluation will include:

- Identification of the number of Minneapolis residents with LEP and possible recalculation of the city's primary language groups;
- Assessment of the current level of services delivered to LEP individuals by each city charter department;
- Reporting of training levels of city staff regarding LEP services;
- Reporting of progress made by individual departments; and
- Feedback and comments from LEP communities, including LEP community organizations and advocacy groups, on the effectiveness of the city's LEP services.

Role of the Department LEP Liaison

The role of the **department LEP liaison** will be an on-going position, filled by a department staff person who has a working knowledge of the department's key business lines and LEP clientele.

This position will be responsible for:

- Establishing and chairing the Department LEP Work Team.
- Coordinating the department assessment and planning exercises.
- Coordinating with the NCR Department's Access and Outreach Manager to ensure consistency with city policy during the development and on-going implementation of the Department's LEP Plan.
- Drafting the Department's LEP Implementation Plan with the support of the NCR Department's Access and Outreach Manager.
- Reporting to their Department Head.
- Seeking approval of the Department's LEP Plan from the NCR department's Access and Outreach Manager, and senior department leadership.
- Monitoring progress on the implementation of the Department's LEP Plan.
- Coordinating the annual evaluation and updating of the Department's LEP Plan together with the NCR Department's Access and Outreach Manager.

Role of the Access and Outreach Manager

The Access and Outreach Manager oversees the development and implementation of the citywide Limited English Proficiency plan and manages the day-to-day operations of the Access and Outreach Division, within the Neighborhood and Community Relations Department. The Access and Outreach Manager is charged with working collaboratively across city departments and with community organizations in order to improve the accessibility of city services to residents who speak little or no English.

Primary Responsibilities:

- Oversee operations of the Access and Outreach Division;
- Supervise Access and Outreach Specialists, support staff and interns;

- Ensure access point to city services for non-English and limited English speaking city residents is provided;
- Ensure that prompt, in-person and telephone interpretation and assistance is provided;
- Develop and maintain relationships with community based organizations and governmental units in order to facilitate communication about and coordination of services and needs;
- Inform city staff, management and elected officials about the issues facing limited and non-English speaking persons and their ability to integrate into the economic and social community of Minneapolis;
- Track volume of requests for services and evaluate the effectiveness of initiatives in meeting the goal of assisting limited and non-English speaking individuals;
- Develop and manage contracts and budgets;
- Lead citywide Limited English Proficiency (LEP) Planning process and work with the City Coordinator's Office to implement, adapt, monitor and update the LEP Plan;
- Work closely with the Limited English Proficiency task force to identify and implement short and long term solutions to LEP clientele of city services;
- Provide assistance to city departments regarding LEP challenges and facilitate relationships with LEP persons and organizations, e.g., in communicating snow emergencies and other city activities to Hmong, Spanish, and Somali speaking communities, coordinating translation of signage and public documents for the city, and acting as information clearing house and contact for departments about immigration activities in the city.

Resolving Complaints about LEP Services

Complaint pathways will address customer concerns regarding poor customer service or the timeliness or quality of interpreter services. The complaints may be made in a number of ways: face to face, by telephone or in writing via the U.S. mail or email. In addition, with the development and implementation of the 311 system there may be opportunities for multilingual voicemail systems to function as comment lines.

Departments will follow their established complaint procedures for LEP persons to make complaints about services received. Departments will document actions taken to resolve each complaint in a timely manner. To ensure continuous improvement in service to LEP persons, the city will seek input from non-English or limited English proficient communities, as well as community-based and advocacy organizations that work and interact with limited English proficient communities.

8. Glossary of Terms

Effective Communication

Effective communication occurs when provider staff has taken the necessary steps to make sure that a person with limited English proficiency is given adequate information to understand the services and benefits available and received the benefits for which he/she is eligible. Effective communication also means that a person with limited English proficiency is able to communicate the relevant circumstances of his/her situation to the provider.

Interpreting/Interpretation

Interpretation is the translation of a spoken message from one language to another, preserving the intent and meaning of the original message.

Limited English Proficiency

A person with limited English proficiency (LEP) cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with city staff.

Individuals who communicate with American Sign Language (ASL) are covered in this definition, although other Federal laws and regulations such as the Americans with Disabilities Act (ADA) apply and should be consulted separately.)

Meaningful Access

Federal standards require that organizations receiving federal funds provide meaningful access to the services for LEP individuals. A person has meaningful access when he or she:

- Is given adequate information;
- Can understand the services and benefits available;
- Can receive the services for which he or she is eligible; and
- Can communicate the relevant circumstances of his or her situation to the service provider.

Notice

Notice means proactively informing LEP residents of Minneapolis that they are entitled to LEP services.

Primary Languages

Languages spoken by at least 1,000 Minneapolis residents.

Resident

Someone who lives within the city boundaries. This plan applies to anyone who lives, works in or visits the City of Minneapolis. In this document, the term "resident" is not related to immigration status.

Timely

Avoids the effective denial or delay of important benefits or services.

Translation

The written transfer of a message from one language into another language.

General resources

A. How to calculate primary languages

Every year, the primary languages in Minneapolis are calculated using a formula that extrapolates data from the Minneapolis Public Schools and the most recent census. The formula is used to identify which languages are spoken by at least 1,000 Minneapolis residents as their primary language.

The formula, $X/Y * Z$ is used where Y = the number of Minneapolis public school students, X = the total population of Minneapolis and Z the number of Minneapolis school students who report speaking a specific language other than English at home.

Once the number of LEP residents is computed by language, the language groups can be listed in order of size and the 1,000 resident cutoffs can be applied.

This formula is used because it can be updated annually (the two main variables are recounted at the beginning of each school year) and it is more directly tied to language rather than the other population based data sources that are based on ethnicity or county of origin. It is not, however, an exact measure of the LEP community, because of the recognized undercounting of minority populations in the US Census.

B. Online general resources

United State Census Information

<http://www.uscensus.gov>

Department of Administration- Demography Center

<http://www.demography.state.mn.gov>

US Citizenship and Immigration Service

<http://www.uscis.gov>

MN Advocates for Human Rights

<http://www.mnadvocates.org>

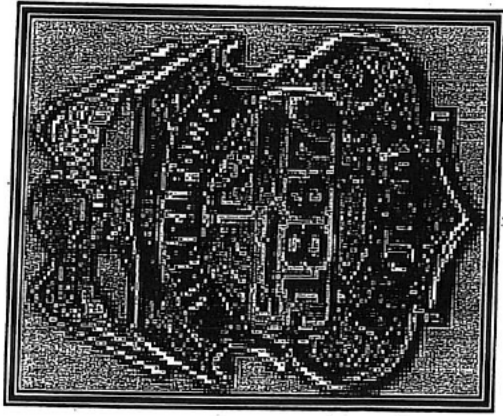
C. Online resources for LEP service

<http://www.lep.gov>

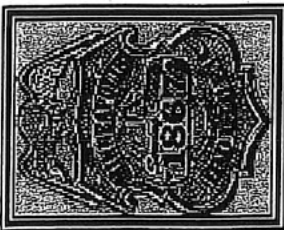
An electronic clearinghouse run by the federal government, providing and linking to information, tools, and technical assistance regarding Limited English Proficiency and language services for federal agencies, recipients of federal funds, users of federal programs and federally assisted programs and other stakeholders.

Limited English Proficiency (LEP) Department Liaisons 2012

Department	LEP Liaison	Tel Ext	Email
311	Dawn Misencik	5925	Dawn.Misencik@ci.minneapolis.mn.us
911	Nancy Martin	5913	Nancy.Martin@ci.minneapolis.mn.us
BIS	Elise Ebhardt	2026	Elise.Ebhardt@ci.minneapolis.mn.us
City Assessor	Denise Lingwall	2389	Denise.Lingwall@ci.minneapolis.mn.us
City Assessor	Valerie Thompson	2392	Valerie.Thompson@ci.minneapolis.mn.us
City Attorney	Colleen O'Brien	2966	Colleen.O'Brien@ci.minneapolis.mn.us
City Clerk/Mayor/Council	Jackie Hanson	2046	Jackie.Hanson@ci.minneapolis.mn.us
Civil Rights	Lee Zutz	2091	Lee.Zutz@ci.minneapolis.mn.us
Communications	Elizabeth Haugen	2009	Elizabeth.Haugen@ci.minneapolis.mn.us
CPED	Krista Bergert	5015	Krista.Bergert@ci.minneapolis.mn.us
Convention Center	Linda Denson	335- 6372	Linda.Denson@ci.minneapolis.mn.us
Finance	Tony DiPietrantonio	2472	Tony.DiPietrantonio@ci.minneapolis.mn.us
Fire Department	Casidy Anderson	919- 7790	Casidy.Anderson@ci.minneapolis.mn.us
Health and Family Support	Seble Bekele	3584	Seble.Bekele@ci.minneapolis.mn.us
Human Resource	Charles Bernardy	3103	Charles.Bernardy@ci.minneapolis.mn.us
Intergovernmental Relations	Matt Bower	2188	Matthew.Bower@ci.minneapolis.mn.us
Police Department	Mary Lou Fiala	3420	MaryLou.Fiala@ci.minneapolis.mn.us
Public Works	Millicent Flowers	3071	Millicent.Flowers@ci.minneapolis.mn.us
Regulatory Services	Mohamed Ismail	3904	Mohamed.Ismail@ci.minneapolis.mn.us

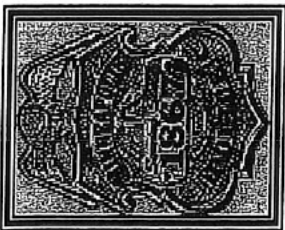


Minneapolis Police Department
“Minneapolis in Any Language”
Limited English Proficiency (LEP)
2013 In-Service Training



Agenda

- **Limited English Proficiency (LEP) defined**
- **LEP Primary Languages and Figures**
- **City Policy for LEP**
- **City Procedures for LEP (Tools)**



LEP Defined

A person who has limited proficiency in English cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with City staff.