



Framework for Language Access Planning

Background

Title VI was enacted in 1964 as part of the Civil Rights Act. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. In the year 2000, Executive Order 13166 was signed which bolstered specific instructions to federal agencies and also recipients of federal financial assistance to provide meaningful access to limited English proficiency (LEP) populations. While federal funding is not connected to all aspects of work within the City of Eugene defining a common set of best practices based on the federal guidelines is a sensitive and systematic approach that will lead to more even service delivery across departments and also ensure a high level of compliance. The Department of Justice created a guiding document for how to approach LEP plans which contains a four main components:

- **Population:** the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee
- **Frequency:** the frequency with which LEP individuals come in contact with the program or have requested services
- **Urgency:** the nature and importance of the program, activity, or service provided by the program to people's lives; and
- **Overall Budget:** the resources available to the grantee/recipient and costs

Framework Principles

- 1) **Demographics Matter.** Find ways to be up to date about who is actually living in the Eugene community and recognize that census data is only a portion of the picture. For language demographic information local schools maybe a great additional resource.
- 2) **Track service requests and capture the information.** Knowing how often services are actually being requested is an important best practice.
- 3) **Track dollars spent on accommodation requests and language access costs/ services.** City departments should use the following activity code: to track these expenses so that we can have a clear indication of what we are spending on being a more accessible organization. [Code like this: Fund-DVSW-Designated Activity Codes]
- 4) **Create language access plans during public engagement processes.** Language Access Plans should include the following:

- Identify Demographic Needs
- Develop Tools and Resources for Staff
- Train Staff on Tools and Resources
- Notify LEP Populations about Available Language Resources/Services

- 5) **Use qualified interpreters and translators.** Departments should utilize vendors for accommodation and translation request from the qualified vendor's pool found in purchasing.
- 6) **Hire for language skill sets.** Department's should continue to recruit and hire for language skills, recognizing that community places priority on bi-cultural staffing not just bilingual.
- 7) **Demonstrate respectful community engagement.** When engaging with agencies and non-profits that serve LEP community members, find ways to compensate them for their expertise and support of City of Eugene outreach efforts.



Limited English Proficiency Population Outreach Report: 11/2012

Introduction

City of Eugene Equity and Human Rights staff has conducted outreach to limited English Proficient (LEP) populations in response to Recommendation 7 of the Language and Communication Access analysis conducted in partnership with CPW and published in February 2012.

Limited English proficient populations include “Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or 'LEP' , entitled to language assistance with respect to a particular type of service, benefit, or encounter”ⁱ.

Methodology

Utilizing the Public Participation Guidelines of the City of Eugene, Equity and Human Rights Center staff and interns developed and executed outreach, which will ultimately culminate in the distribution of this report to community partners who have participated.

The outreach was multifaceted and included stakeholder interviews, focus group discussions, class visits, and surveys. The surveys were translated into Spanish, Chinese (simplified), Korean, and Arabic (modern standard) based on the demographic information highlighted below. In addition to collecting information, efforts were made to provide basic civics education and answer questions to increase knowledge on how to access City services and the distinction between other governmental agencies in service provision .

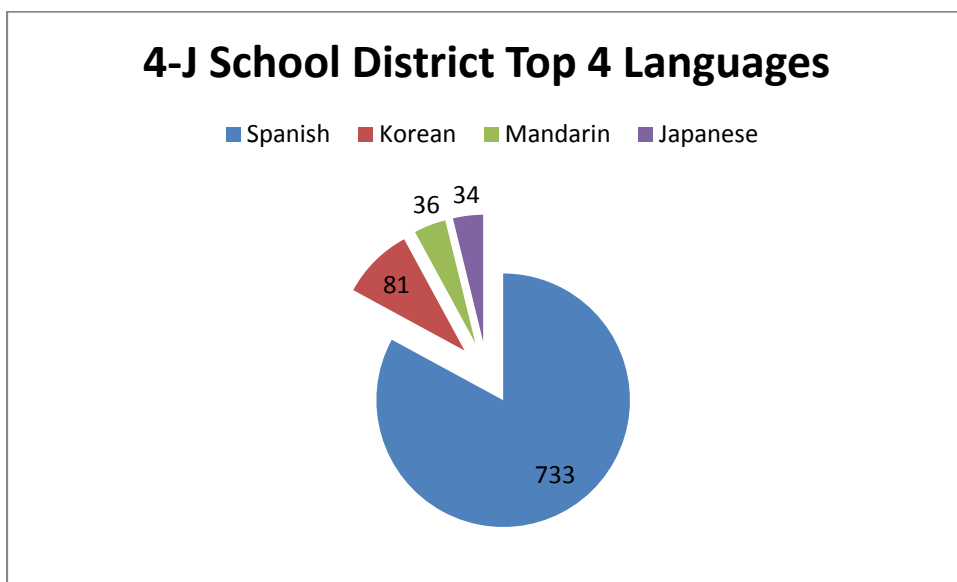
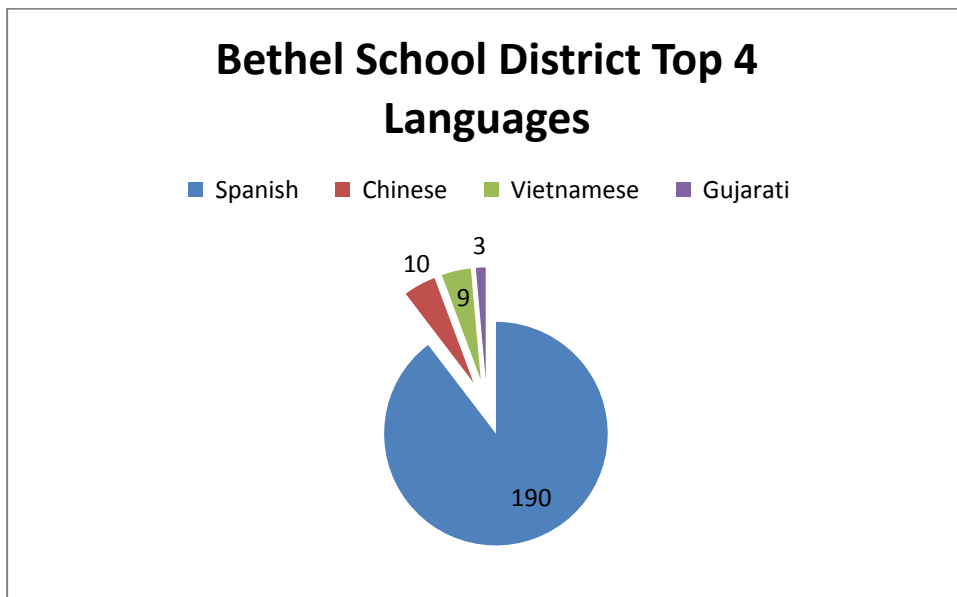
Partner agencies for this outreach included the Chinese Baptist Church, Huerto de la Familia, Moss Street Children’s Center, and Lane Community College. Approximately 200 people participated in this process.

Targeted Languages Based on Population Data

Priority languages for outreach and translation of materials were chosen by considering 2010 US Census Bureau data on languages spoken in the home in Eugene along with data collected from Bethel and 4-J School districts. School data can provide a useful check since there is criticism that LEP populations do not participate fully in Census polling and therefore are likely under-represented. Parents however are likely to report language needs to their childrens' school to ensure they receive the necessary tools to help them achieve their educational goals.

The determination was made to translate materials for this outreach into four languages: Spanish, Chinese (simplified), Korean, and Arabic (modern standard). A combination of the total population speaking the language in combination with considerations for linguistic isolation informed this decision. For example, though there are slightly more Japanese speakers who report they do not speak English well, as compared to Arabic speakers, there is a higher percentage of the Arabic speaking population that report they have limited English. Because often people’s most valuable language resources are members of the language community itself, language communities with fewer members who are fluent in English are posed with more challenges when accessing services.

Summary of School Language Data for 4-J and Bethel School Districts



Census Data on LEP Populations

The following are the top five languages spoken in the home as identified by the American Community Survey's report on Language Spoken at Home by Ability to Speak English (Population 5 Years and Over) (5 year estimates 2006-2012).

Spanish

There are 8,717 people who speak Spanish in the home in the City of Eugene. Of these 2,742 report speaking English "not well" or "not at all".

26.04% of those who speak Spanish in the home identify themselves as LEP.

Chinese (Mandarin and Cantonese)

There are 1,420 people who speak Chinese in the home in the City of Eugene. Of these 646 report speaking English "not well" or "not at all".

45% of those who speak Chinese in the home identify themselves as LEP.

Korean

There are 879 people who speak Korean in the home in the City of Eugene. Of these 479 report speaking English "not well" or "not at all".

55% of those who speak Korean in the home identify themselves as LEP.

Japanese

There are 1276 people who speak Japanese in the home in the City of Eugene . Of these 362 report speaking English "not well" or "not at all".

28% of those who speak Japanese in the home identify themselves as LEP.

Arabic

There are 480 people who speak Arabic in the home in the City of Eugene. Of these 264 report speaking English "not well" or "not at all".

55% of those who speak Arabic in the home identify themselves as LEP.

Surveys

There were 167 surveys completed as result of this outreach. Of these, 149 were gathered in coordination with City of Eugene staff visits to partnering organizations. Huerto de la Familia provided staff to assist with the completion of the remaining 18 surveys. Along with the goal of distributing and collecting survey results this outreach also served as an opportunity to provide education about City structure and services, provide a point of contact for agency staff and community members who participated, and provided an opportunity for people to ask questions and provide more insight into their survey responses through dialogue. The themes from these discussions are captured below. There were about 500 surveys distributed externally and 200 distributed internally through the City. A copy of the English survey can be found in the appendix.

Distribution of surveys was facilitated by partnering with community organizations that serve a high volume of LEP populations and agreed to participate:

LCC: Civics ESL Classes, Civics Forum

Moss Street Children's Center

Chinese Baptist Church

Huerto de la Familia

Results

There were a wide range of languages represented in this outreach. Some of the people who participated would not consider themselves to be LEP but were in groups that we targeted that had mixed populations. Included in this list of languages are several indigenous languages from Mexico and Central America including: Zapoteco, Mixteco, and Nahuatl. So while Spanish is by far the largest represented language, these native languages are also spoken by many Spanish speakers who participated. It is significant that during this outreach many participants who spoke one of these indigenous languages as their first language demonstrated observable difficulty completing the Spanish language survey due to limited literacy in Spanish.

First and Second Language Frequency in Surveys

Spanish	92
English	10
Zapoteco	7
Korean	5
Mandarin	5
Gujarati	3
Thai	3
Cantonese	2
French	2
Hindi	2
Russian	2
Tagalog	2
Arabic	1
Farsi	1
Garifuna	1
Georgian	1
Hebrew	1
Ilonggo	1
Italian	1
Japanese	1
Lao	1
Mayan	1
Mixteco	1
Nahuatl	1
Portuguese	1
Punjabi	1
Romanian	1
Serbian	1
Vietnamese	1

Gender

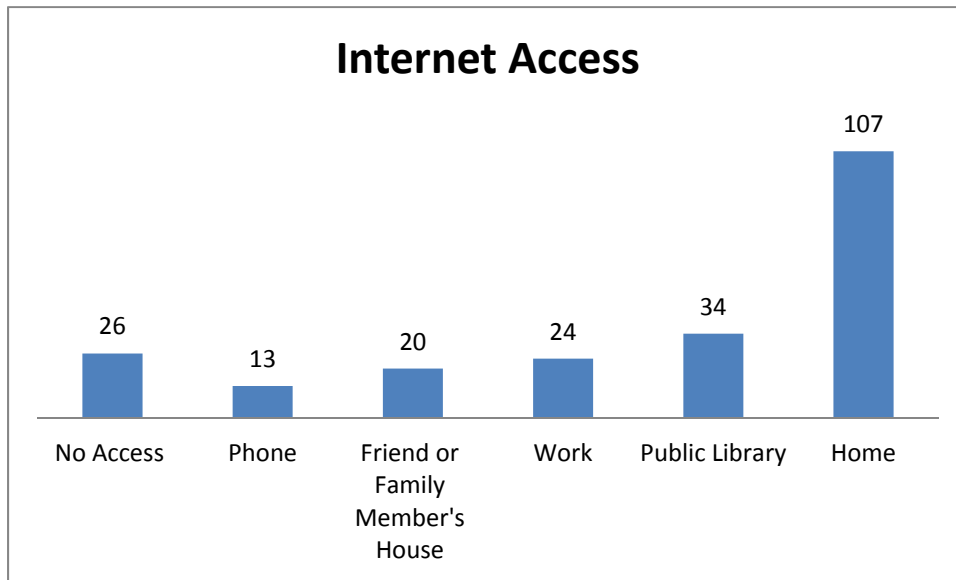
Female	86
Male	42

Age

The youngest respondent was 16 years old and the oldest was 72 years old. The overall average for all surveys was 36 years of age.

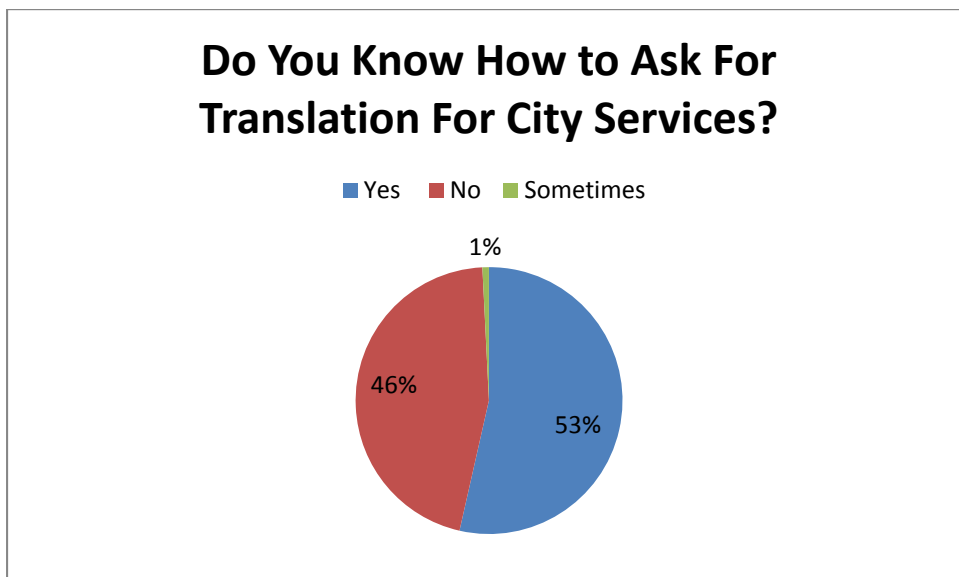
Internet Access

The majority of respondents had daily access to internet in their homes, places of employment or on their phones. Please note people could choose more than one point of access. However it is significant that over 10% of respondents had no internet access at all.



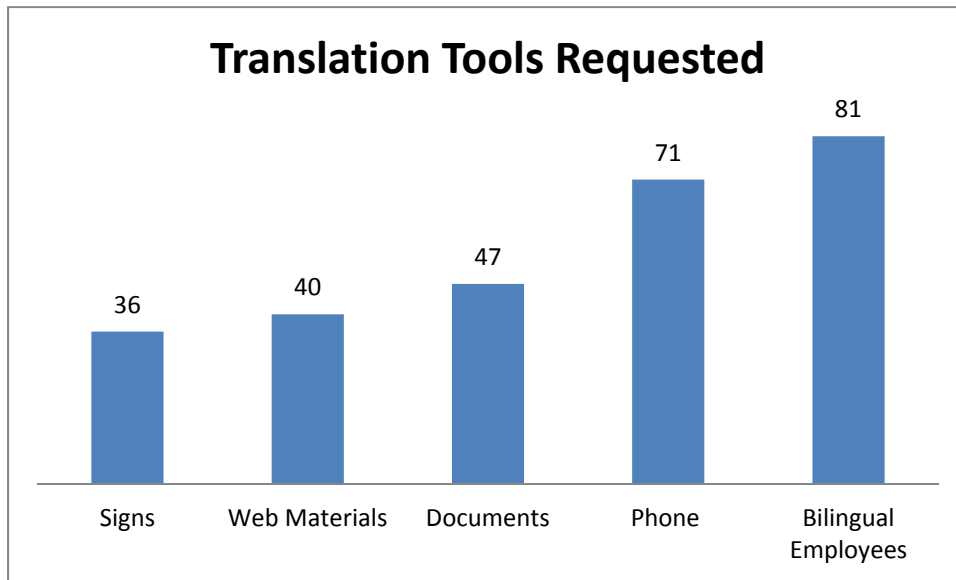
Translation for City Services

There was a fairly even split between respondents regarding their knowledge about how to request translation assistance. The 1% listed wrote in either "sometimes" or "it depends". It seems likely this is due to differential experiences working with different City departments.



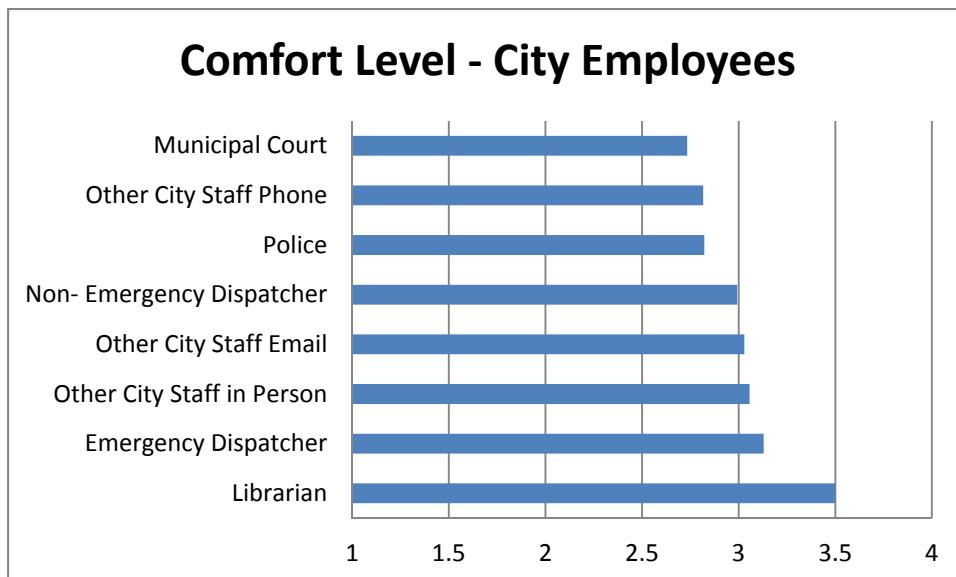
Requested Tools

Live translation options, including phone and in person services were the highest priority amongst the survey respondents when asked about the translation tools they would like the City to offer. Please note that people were allowed to choose more than one option.



Comfort Level Interacting with City Employees

Participants were asked to rank their comfort interacting with City staff from 1 (uncomfortable) to 4 (comfortable).



Focus Group Discussions

Discussions were part of outreach visits done during survey distribution and collection. These discussions were part of the outreach at:

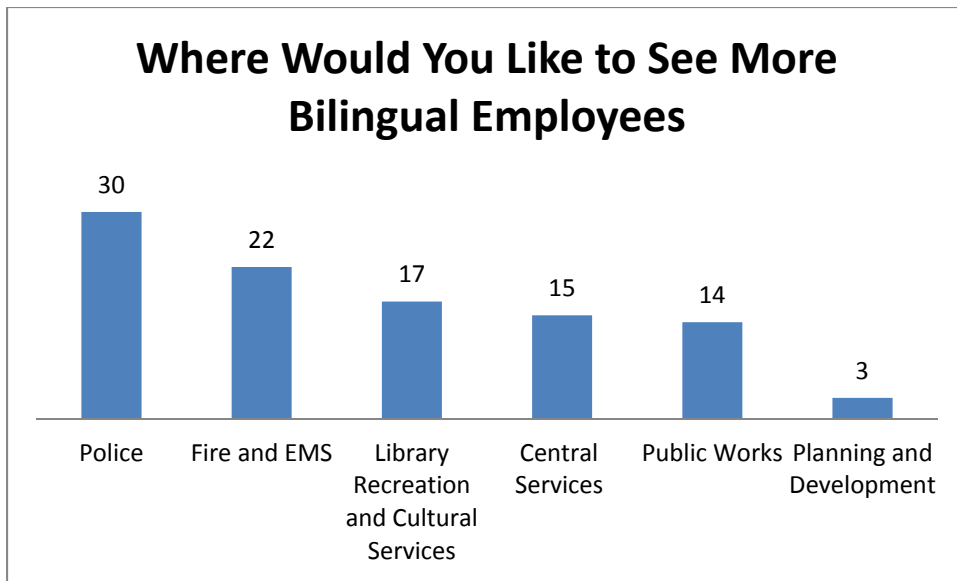
LCC Civics ESL Classes and Weekly Forums

Chinese Baptist Church – Evergreens Club, Weekly Potluck

Themes from these discussions included:

- Making complaints against neighbors (noise, garbage, code violations) was unclear.
- Many people wanted to know how to get a job with the City.
- People have had difficulty understanding parking tickets and fine increases over time and expressed frustration and feelings that the system was unfair and confusing.
- There were questions about the availability of scholarships for recreation activities.
- Some people wanted to know if the City had a website and if it was available in other languages.
- There was a general lack of understanding about what services the City provides and how these services are distinct from other governing bodies and also service providers like the hospital.
- It was common for there to be general questions about what to do in case of emergency including questions about how 911 dispatch worked and also what would happen if people who don't speak English call 911.
- People wanted to know how to report non-emergency police complaints such as drug tips.
- There were a couple of questions about what to do if there is a complaint against the police.
- Several people identified the challenge in requesting a translator if they don't speak English. This was a particularly common concern for those who speak languages other than Spanish as their first language such as Chinese speakers.

In addition to general discussion about half of the people who participated in the survey were also asked to participate in an exercise to identify their priority areas for more bilingual and bicultural employees within the City.



Stakeholder Interviews

Stakeholders included staff at the organizations that participated in the survey distribution and also staff and community members affiliated with organizations that also serve large LEP populations that chose not to or were unable due to timing to participate in survey distribution but were interested in providing feedback on the project. These interviews were generally about an hour in length and were conducted both in person and over the phone.

Themes that came out of these interviews are as follows:

- When the City is doing outreach or work through community partner organizations the costs to those organizations should be recognized and they should be compensated for their time.
- The City should make an “ambassador” type position to actively outreach to populations with linguistic or cultural barriers to accessing City services. This person should be a main resource point of contact and should also be actively networking in the community so that people know the position exists. This person should be a central resource with the ability to help people navigate the City as an organization and connect the community to and educate the community about existing resources and systems. The City is a diffuse and fragmented organization that is difficult to navigate without internal knowledge, particularly in the context of a population facing linguistic or cultural barriers.
- The population of the community is not static. New people are always arriving which creates a constant need for education and outreach to continually empower people

with the tools and resources they need to get their needs met and understand their rights and responsibilities.

- Informal lay translators are heavily relied upon to help people meet their basic needs. This is taxing on people and organizations that help fill the gap. There is frustration that the City should be providing those services and that the City's inability/unwillingness to do so creates unnecessary and uncompensated burden on others.

Conclusion

This outreach was multifaceted and utilized a variety of methods to reach out to populations that are often under-represented. There was a focus on partnering with community agencies which had the benefit of increasing relationships between these agencies and the City of Eugene. In addition particular attention was paid to going out and meeting people in places and at times that were already part of the targeted populations' routine. This removed barriers to participation that might have otherwise been experienced attempting to bring people to an outside event or discussion session. Some of the meetings were held in places that were welcoming to children and encouraged families to participate. The spaces were also dominated by surroundings and other people that were familiar and trusted. This provided a less threatening atmosphere where more frank discussions and questions could be engaged.

Overall, this outreach revealed a very low level of understanding about government in general and City government more specifically. Most of the participants lacked a general understanding of how different levels of government interact. There was a common theme that accessing the City without this basic understanding was challenging at best and almost impossible when compounded by linguistic and cultural barriers.

Creating a more prominent, centralized entry point for inquiries, preferably staffed by bilingual employees, was a fairly common request. More than one participant recommended making this position a fairly outward facing "ambassador" that would have scheduled time to do proactive outreach to underserved communities and let them know about the opportunities for interacting with the city and where to go if they have particular issues.

There are varying levels of access to internet amongst this sample and translated documents and web materials were not the most requested services. This makes reliance on web based resources problematic. Also, a brief survey of the Google Translate functionality on the website revealed that the navigation buttons do not translate, making navigation to the appropriate pages extremely difficult.

There are varying levels of comfort interacting with City staff depending on their department. It is important to consider that language barriers or fears about language barriers that might be encountered will likely exacerbate the level of discomfort. Making clear proactive communication about how to access all City services in other languages may help to increase

comfort level. The focus group discussion revealed a large gap in knowledge about language access in emergency services and code enforcement in particular.

It is crucial to consider the experiences and recommendations of LEP populations in creating a framework for language access for the City of Eugene. This will help to maximize the benefit to the community by prioritizing areas of urgency and focusing limited resources in a more precise and meaningful way.

Appendix



City of Eugene Language Access Survey

Written Survey

Languages Spoken (starting with the primary language you speak, followed by others):

Gender: _____ Age: _____

1. Circle your level of comfort, in seeking services from or expressing your concerns to:

a) A Eugene Police Officer

1	2	3	4
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b) A Eugene Police and Fire non-emergency dispatcher

1	2	3	4
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c) A Eugene Police and Fire emergency dispatcher

1	2	3	4
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d) A librarian

1	2	3	4
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e) Municipal Court

1	2	3	4
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f) Other city staff (In person)

1	2	3	4
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g) Other city staff (by phone)

1	2	3	4
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h) Other city staff (by e-mail)

1	2	3	4
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2. Where do you have access to the Internet? (Circle all that apply)

- a) I don't have access to the internet
- b) at home
- c) at work
- d) at the Public Library
- e) at a friend or family member's house
- f) other: _____

3. In seeking city services, if you needed an interpreter would you know how to request one? (Y/N)

4. Have language barriers ever prevented you from receiving necessary services (medical, housing, childcare, food, utilities)?

5. Please circle all of the following language access tools that you think would be helpful to you in accessing city services:

Phone translation lines

Translated web materials

More translation of signs

More translated documents

Other _____

More bicultural/bilingual employees
(what culture/language?) _____

6. What resources do you currently use to access necessary services or for your other translation needs?

a) friends

b) colleagues

c) family members

d) members of your church/ faith community

e) your child's school

f) social workers

g) other _____

Are your needs being met?

My needs are:

1	2	3	4
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Check the box if you are interested in attending a discussion about local city government and how the city can make its departments welcoming and accessible for people with limited English proficiency.

ⁱ Federal Register, Volume 67, No. 117, Tuesday June 18, 2002, pg 41459