

Safety Shelter of St. Johns County, Inc. dba Betty Griffin House

Limited English Proficiency Plan

The mission of Safety Shelter of St. Johns County, Inc. is to offer protection and quality services for victims of Domestic Violence and their minor children and/or victims of Sexual Assault and their families of St. Johns County, FL, through operation of a shelter offering assistance, counseling, and transitional support.

To educate the community about services provided and raise awareness of the problems of Domestic Violence and Sexual Assault in order to break cycles of abuse.

Safety Shelter of St. Johns County, Inc. recognizes that providing meaningful language access is a critical function of ensuring safety and security for all survivors of sexual and domestic violence.

B. Language Access Needs:

Safety Shelter of St. Johns County, Inc. has identified that English, Spanish or Spanish Creole, and American Sign Language are the languages spoken in our community. The analysis of the general population and population served by our agency revealed that we need to build capacity to provide meaningful access in each of these languages.

Additional strategies for building relationships with and increasing our capacity to serve other Indo-European Languages, Asian and Pacific Languages, and other languages will be outlined in this plan.

C. Capacity-Building:

Safety Shelter of St. Johns County, Inc. offers the following services: _24 hour crisis hotline, service management, emergency shelter, counseling, assessment of children, direct service information and referral, service management, community education, professional training, and safety planning. We have identified several strategies for creating meaningful access to these services:

Service Language Access Strategies:

Train service staff and volunteers on connecting to Language Line services.

Add "Preferred Language" Categories to Intake Form to improve screening and evaluation.

Post availability of interpreters near entrances of service areas.

Train service staff and volunteers on this Limited English Proficiency (LEP) Plan and the resources available for providing language access.

Train service staff and volunteer to contact the Single Point of Contact (SPOC) or backup SPOC to request interpreters.

Post this LEP Plan on the Safety Shelter of St. Johns County, Inc. website.

Progress toward greater language access will be measured by:

Completing staff training evaluations that will assess comprehension and ability to implement language access strategies. Goal: 95% of direct service staff will be able to successfully implement language access by December 31.

New intake category for "Preferred Language" will be implemented by December 1.

Fund Development:

Immediate funding needs include developing a budget for interpretation and translation.

Long term funding needs may include hiring plan for bilingual advocates and bilingual outreach materials to raise awareness.

Section 2: Policies

Limited English Proficiency

1. Safety Shelter of St. Johns County, Inc. will never turn anyone away because they do not speak English. Furthermore, Safety Shelter of St. Johns County, Inc. will work to improve our capacity to provide meaningful access to individuals with limited English proficiency.
2. Safety Shelter of St. Johns County, Inc. primary focus is to provide support and safety to victims of domestic violence and sexual assault through direct services. Therefore, Safety Shelter of St. Johns County, Inc. will develop and secure sustainable language resources as needed in both oral and written form so that no victim will be denied access to information or services. ¹

It is the policy of this agency to provide timely meaningful access for persons with LEP to all agency programs and activities. All personnel shall provide free language assistance services to individuals with limited English proficiency whom they encounter or whenever a person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services to them.

3. Safety Shelter of St. Johns County, Inc. recognizes that many low-income individuals in its service area have limited English proficiency. Safety Shelter of St. Johns County, Inc.'s goal is, whenever practicable, to offer and provide the same high quality service to all survivors, regardless of their language and communication abilities. The Single Point of Contact (SPOC) will be in charge of implementing Safety Shelter of St. Johns County, Inc.'s policy for assisting survivors with limited English proficiency (the "LEP Policy").²

A. Purpose and Authority:

1. The purpose of this plan is to ensure that Safety Shelter of St. Johns County, Inc. provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. Safety Shelter of St. Johns County, Inc. is committed to this plan as the appropriate

response to meeting survivors' needs. This plan is consistent with federal requirements. All agencies that receive federal financial assistance from the U.S. Department of Health and Human Services (HHS) 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.¹

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, for agency 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 to serve survivors of domestic abuse and sexual abuse.

Section 3: Practices

A. Language Assistance Measures:

1. Safety Shelter of St. Johns County, Inc. expects staff to familiarize themselves with the language access practices and resources outlined below. Staff should work directly with supervisors with questions, concerns, or to report difficulties in accessing the indicated resources.

At point of contact the staff member will identify language spoken. Connect with bilingual staff, interpreter, Language Line, SPOC, etc.

One-on-one Participant Meetings-the staff member will notify the SPOC to ensure that an interpreter is available. Follow best practices for ensuring safety for participant by securing the name of the interpreter in advance, requiring an interpreter confidentiality agreement, etc.

Community-Based Services- Meet with other agencies and provide information about LEP plan and resources so that they may assist in informing LEP individuals of language assistance services available. Have brochures and other materials available in Spanish and other languages. Call the referral source and identify a point of contact with adequate language capacity. Connect the participant with the point of contact.

2. Safety Shelter of St. Johns County, Inc. is committed to ensuring quality services to all survivors and toward that goal we have developed a plan to provide meaningful access to our services for survivors with LEP through bilingual advocates, and when needed we will provide in-person interpreter services via in-person or over-the-phone interpretation. ¹

3. Safety Shelter of St. Johns County, Inc. is committed to assuring clear, confidential, two-way communications with all survivors. As part of this commitment Safety Shelter of St. Johns County, Inc. will provide trained and competent interpreters, whenever oral communication is needed. This service will be provided at no charge to the survivor. Safety Shelter of St. Johns County, Inc.'s preferred means of achieving this goal will be to employ staff who are fluent in the major languages spoken by survivors in our community.

When Safety Shelter of St. Johns County, Inc. staff members who are working directly with a survivor are not fluent in the survivor's language, Safety Shelter of St. Johns County, Inc. 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, Safety Shelter of St. Johns County, Inc. will use Language Line or a similar over-the-phone interpreter service.²

For Limited English Speaking Survivors, please use the following service:

Optimal Phone Interpreters (OPI)

Before Call:

Know the language that is needed

Be prepared to brief the interpreter about the nature of the call before he/she speaks to your Limited English Speaker

If you have non English Speaker on the phone call OPI and connect a 3 way call

For outbound calls, provide the operator with a dial out number and she will make a 3 way conference call

How to Make a Call to OPI:

Dial 1-877-344-9674 you will be asked

- What language you need
- Where you are calling from and respond: Safety Shelter of St. Johns County, Inc. or Betty Griffin House
- What is your first and last name
- What is the code number for your agency---630

During the Call:

- Speak in short phrases or sentences
- Avoid slang, jargon, and technical terms
- Check for understanding from you Limited English Speaker throughout the call. If needed, rephrase the questions or statements until understood
- When speaking to the not give interpreter, do and/or ask too much information at one time.
- Ask questions in the first person.

Ending the Call:

Be sure the Limited English Speaker and Optimal Interpreter know that the call is ending.

Customer Complaints

If you believe you were wrongfully denied access to services or discriminated against:

1. Inform the person who denied access to services that you believe they wrongfully denied you services and why you believe that is the case.
2. Ask to speak to a manager, immediately.
3. You may submit your complaint/grievance in writing or verbally. Direct your concern to the Joyce Mahr, Chief Executive Officer or Kelly Franklin, Chief Operating Officer. Include the following information:
 - a. What service were you denied?
 - b. What were you told was the reason you were denied service?
 - c. What person denied you services?
 - d. What was the date you were denied service?

In addition to the above actions, discrimination complaints may also be filed externally with the state and federal government.

Assistant Staff Director for Civil Rights
1317 Winewood Boulevard
Building 1, Room 110
Tallahassee, FL 32399-0700
850-487-1901

Florida Commission on Human Relations
2009 Apalachee Parkway, Suite 100
Tallahassee, FL 32301-4857
850-488-7082

US Department of Health & Human Services
Office for Civil Rights
Atlanta Federal Center, Suite 3B70
61 Forsyth Street, SW
Atlanta, GA 30303-8909
404-562-7881

US Department of Justice
Coordination & Review Section
Civil Rights Division
P.O. Box 66118
202-514-0301
Washington, DC 20035-6118

Notification of Language Assistance Services:

1. Posters notifying survivors with LEP of their language service rights will be developed and displayed in areas where intakes are conducted. They will be in English as well as the principle languages spoken in the service area. Flyers will also be developed and made available throughout the program and community. Staff will also have access to the Safety Shelter of St. Johns County, Inc. Language Access plan, and will have 'I-Speak Cards'. These are laminated business-sized cards that say in both English and the principal languages 'I need a (appropriate language) interpreter. 1

2. In all of its intake areas and on its website, Safety Shelter of St. Johns County, Inc. will post and maintain clear and readable signs in the languages most prevalent in our community notifying survivors that free translation and interpretation services are available to them.

All Safety Shelter of St. Johns County, Inc. intake staff will have "I speak" cards in the languages most prevalent in our community.2

Staff Compliance :

1. Safety Shelter of St. Johns County, Inc. staff will initiate an offer for language assistance to constituents who have difficulty communicating in English.

2. All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services for all services offered. 2

Additional Language Access Policies:

Bilingual Staff

1. Safety Shelter of St. Johns County, Inc. will hire bilingual/bicultural staff members whenever possible to work directly with individuals with limited English proficiency.

Children as Interpreters Policy

1. Safety Shelter of St. Johns County, Inc. will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.2

F. Training:

Staff Training

1. Safety Shelter of St. Johns County, Inc. 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. One staff may be appointed to monitor implementation of the plan and conduct staff training as needed.

- All staff providing technical assistance, training or receiving in-bound calls will received LEP training upon employment.

- LEP training will include information on the following topics:

- Legal obligation to provide language assistance;

- LEP plan and procedures;

- Responding to LEP individuals;

- Obtaining interpreters (in-person and over-the-phone);

- Using and working with interpreters (in-person and over-the-phone);

- Translating procedures; and

- Documenting language requests ¹

All new staff members will receive cultural competency training with Safety Shelter of St. Johns County, Inc. After their initial training, all staff members will receive refresher training in cultural competency and language access.

2. In order to establish meaningful access to information and services for survivors with LEP, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained on Safety Shelter of St. Johns County, Inc.'s LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with survivors with LEP.

Management staff will be included in this training, even if they do not interact regularly with survivors with LEP, to ensure that they fully understand the plan, so they can reinforce its importance and ensure its implementation by staff.³

Section 4: Monitoring and Staff Responsible for Monitoring

Plan to Monitor Effectiveness:

1. Safety Shelter of St. Johns County, Inc. will conduct an annual evaluation of its LEP plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving survivors with LEP. The appointed staff will lead the evaluation with the assistance of other staff. The evaluation will include the following:

1. Assessment of the number of persons with LEP in our services area

2. Assessment of the number and types of language requests during the past year: how many were met and with which strategies, how many were not met and why.

3. Assessment of whether survivors with LEP are satisfied with existing language assistance services and that the services are meeting their needs.
4. Assessment of whether staff members understand the LEP plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and still accessible.¹

2. Safety Shelter of St. Johns County, Inc. intake personnel will record each person's language of choice on the intake sheet. This information will be followed up by service management to review language access options. ²

3. In connection with updates to this Language Access Plan, Safety Shelter of St. Johns County, Inc. may use some of the following tools to conduct further assessment:

1. Conduct surveys or focus groups.
2. Develop an evaluation process to assess LEP service provision.
3. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.³

Section 5: Community Outreach and Collaboration

1. Safety Shelter of St. Johns County, Inc. will identify the primary sources through which survivors with LEP are referred to our services, and culturally-based organizations that serve individuals with LEP in our community. Safety Shelter of St. Johns County, Inc. will work to develop collaborative relationships with these organizations to ensure more seamless access to services, accountability to our own language access policies, and greater access to survivors with LEP.

2. Safety Shelter of St. Johns County, Inc. will share its LEP Policy and the documents and knowledge it develops in regard to LEP resources with the other services organizations in our area that requests the information. ⁴

Section 6: Definitions

Language access: the rights of individuals with Limited English Proficiency (LEP) to receive meaningful access to federally funded state and Federal 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: involves conveying information orally from one language to another (e.g. interpreting during an interview)

Translation: involves conveying information in writing from one language to another (e.g. translating documents)

1. Adapted from the Kansas Coalition Against Sexual and Domestic Violence, Model Limited English Proficiency (LEP) Plan, <http://kcsdv.org/images/pdfs/model-LEPplan.pdf>

2. Adapted from the Legal Assistance of Western Missouri plan available at http://onlineresources.wnylc.net/pb/orcdocs/LARC_Resources/LEPResources/ModelLEP?LegalServicesofWesternMissouriLEPPlan.pdf

3. Adapted from the MARC plan available at <http://marc.org/Transportation/Equity-Considerations/pdf/LimitedEnglishProficiencyPlan.aspx>