

Language Assistance Plan

This plan was developed to address Town of Waterford Language Assistance Plan to assist residents who are language deficient. At this time (93.0%) ninety-three percent of the Town of Waterford's population indicated that they speak English "very well". 7 % of the remaining population that describes themselves as speaking English less than "very well", the census indicates that the non-English speaking individuals are fluent in either Spanish or Indo-European Languages.

Policy

It is the policy of the Town of Waterford to provide timely and meaningful access to all agency programs and activities for Limited English Proficiency (LEP) persons. Our primary goal is to communicate effectively with LEP individuals. When staff has reason to believe that an individual is LEP, it is incumbent on the staff to respond to that individual in a language he/she understands. Staff will provide or facilitate language assistance services to LEP individuals whom they encounter or upon request of the LEP individual at no charge and within a reasonable amount of time. Notice is posted in offices so that members of the public will be aware that language assistance services are available at no cost. A statement is also available on website in policies and procedures documents.

Procedure

Public Hearings, notices, and brochures will indicate that free language assistance is available. Upon request, written documents may be translated in the language of the LEP individual and then be returned to the LEP individual within a reasonable length of time. Upon request, a language-interpreting vendor can provide interpretation services via the telephone. There will be no charge to the LEP individual for this service.

Four Factor Analysis

The TOW shall determine which items, if any, will be translated and available prior to being requested by a LEP individual by applying the four-factor analysis. These documents may include but not be limited to:

Emergency Transportation Information

Markings, signs, and packaging for hazardous materials and substances.

Notices of public hearings (i.e. legal notices) regarding TOW's proposed plans, projects, or changes, and reduction, denial, or termination of services or benefits.

The Four Factor Analysis that will be taken into consideration are as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service provided by Senior Services.
2. The frequency with which LEP individuals come in contact with the program, activities or services.
3. The nature and importance of the program, activity, or service provided by the TOW to the LEP population. (Make a determination as to whether denial or delay of access to services or information could have serious or even life threatening implications for the LEP individual.)
4. The resources available to the TOW and the overall costs to provide LEP assistance. (Examine cost and benefit; limiting services must be well substantiated before using this factor as a reason to limit language assistance.)

Currently the only document available in a language other than English is the Spanish version of the transportation registration form. Other documents are not routinely available in languages other than English due to lack of demand.

The Fact Finder Surveys will be reviewed biennially to determine whether changes in the Town's population indicate that 5% or more of the population are unable to speak English "very well". If the review indicates a significant population of Spanish speaking (or other language) individuals then documents such as, brochures, registration forms, policies, and procedures will be translated to the alternate language identified as being the most prevalent and will be available to LEP individuals.

Language Assistance Measures

In the event that a resident/customer with Limited English proficiency (LEP) requests the services of an interpreter, either by phone or in person, Senior Services staff will respond to the request in a reasonable amount of time. Staff can either contact the Title VI coordinator to arrange for interpretive services or staff can show the LEP individual the "I Speak" poster or cards in order to determine what language the person speaks. If staff can use the services of a Spanish-speaking staff member they will make the appropriate arrangements. If the LEP individual needs a translator for any other language, Staff will then dial 1-800-752-6096 to request the services of an interpreter who can translate for the individual and for the staff. The Town of Waterford has a contract with **Language Line Solutions** to provide on demand translation services via telephone to LEP persons.

Interpreters should 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). Interpreters should have knowledge in both languages of any specialized terms or concepts

particular to the program or activity and of any particularized vocabulary and phraseology used by the LEP person; and understand and follow confidentiality and impartiality rules to the same extent as the person for whom they are interpreting and/or to the extent their position requires. They should understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles.

In certain cases, a LEP individual may prefer to choose her/his own interpreter. In this case staff should consider whether a record of that choice and the recipient's offer of assistance are appropriate. Where precise, complete and accurate interpretations or translations of information and/or testimony are **critical**, or where the competency of the LEP person's interpreter is not established, the TOW may decide to provide its own, independent interpreter, even if the LEP person wants to use his or her own interpreter as well. Extra caution should be used when the LEP person chooses to use a minor as an interpreter.

Monitoring the Language Assistance Plan (LAP):

The Town of Waterford will monitor the LAP through biennial demographic reviews and post-program surveys tailored for LEP clients. Surveys will be translated as needed and assess access to services, satisfaction with language support, and overall program experience. Feedback will guide improvements to language services and staff training.

Staff Training

Through Language Line Solutions, Senior Services will seek training and materials to assist us with providing effective access to programs and services to LEP individuals through our orientation program for new employees.

Public Participation Plan for Transportation

Town of Waterford-Senior Services Department

In order to reach out to low-income, minority, and Limited English Proficiency residents in the Town of Waterford, Senior Services has established the following plan.

Senior Services will ensure that significant changes that are proposed to the transportation service such as, adding/deleting service days, changing the coverage area, extending or shortening the time the service is provided, the proposed changes will be listed as an agenda item for consideration by the Senior Citizens Commission and announced to the community through the following means:

- Posted on the Town of Waterford Website
- Posted in Town Hall
- As the transportation service is provided to approximately (650) registered passengers, current users of the services may also be notified personally through a mailing.

- Conducting spot surveys or establishing a transportation advisory group may also be considered in order to determine if we are meeting the needs of the community.
- Senior Services staff works closely with the area Senior Center directors as well as the Eastern CT Transportation Consortium to discuss transportation and how best to fill the needs of the residents.
- Articles about the transportation program appear regularly in the Senior Services Newsletter, which is mailed free of charge to Senior households, housing sites for elderly and disabled and seniors, as well in the Town of Waterford Recreation and Parks circular that is delivered to every household in town at no cost.