

# **STAR, Inc, Lighting the Way...**

## **Limited English Proficiency Plan**

### **I. Introduction**

This Limited English Proficiency (LEP) plan was developed to ensure equal access to services provided by STAR, Inc., Lighting the Way... (STAR) for persons with limited English proficiency. Limited English proficient (LEP) persons are defined as individuals who do not speak English as their primary language, and who have a limited ability to read, write, speak, or understand English. This plan will be reviewed and updated annually.

### **II. Legal Authority**

Title VI of the Civil Rights Act of 1964 prohibits discrimination, in part, on the basis of national origin in the delivery of services or benefits funded by the Federal government. Under this law, federally assisted programs must ensure their activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination. Executive Order 13166, "Improving Access to Services for Persons with LEP," was signed on August 11, 2000, provides further direction, requiring that Federal agencies provide meaningful access to federally assisted programs and activities for LEP persons. In addition, the Order requires that Federal agencies create plans to provide LEP persons with meaningful access to federally conducted programs and activities.

In August 2000, the Department of Justice (DOJ) issued guidance for agencies to follow in creating plans to make Federal services, activities, and programs accessible for LEP persons. The guidance provided four factors for agencies to consider when developing their LEP plans. These factors were: (1) the number of LEP persons in the eligible service population or likely to be encountered in recipient activities and programs; (2) the frequency with which LEP persons come into contact with the program; (3) the importance of the service or information provided by the program; and (4) the resources available to the recipient of Federal funds.

### **III. Agency Mission**

STAR, Inc., Lighting the Way, is a not-for-profit organization serving individuals of all ages with developmental disabilities, as well as providing support services to their families. We create opportunities for individuals to live full lives with independence, freedom of choice and personal growth by providing support, services and advocacy. We inform and encourage the community to recognize and appreciate the value of all individuals.

#### **IV. Policy**

It is STAR's policy to ensure that reasonable steps are taken to provide meaningful access and an equal opportunity to participate in services, activities, programs, and other benefits to individuals whose first language is not English. This policy includes providing oral interpretation or written translation of vital documents and other information to LEP persons and their authorized representatives. All interpreters, translators, and other aids needed to comply with this policy will be provided without cost to the person being served. Further, LEP persons and their authorized representatives will be informed of the availability of such assistance free of charge.

This plan will be distributed to the STAR workforce and should be used as guidance with respect to Agency employees' interactions with LEP customers. STAR employees will receive appropriate LEP training.

#### **V. Agency Plan and Four Factor Analysis**

The Agency's plan is based on the four-factor analysis, which is used to determine the appropriate language assistance services to ensure that an LEP person has meaningful access to the Agency's programs and activities. The four factors on which this plan is based are:

*Factor 1: Determine the number or proportion of LEP persons eligible to be served or likely to be encountered by the program.*

Results: 12% of STAR's service area are of Hispanic origin (this does not imply LEP) – according to US Census data 2012-2016.

Results: The Department of Developmental Disabilities (STAR's referral source) has historically referred and average of one person with LEP per three years.

*Factor 2: The frequency with which LEP persons come in contact with the program.*

Results: The Department of Developmental Disabilities (STAR's referral source) has historically referred and average of one person with LEP per three years.

Results: Otherwise, eligible applicants who are LEP would come in contact with STAR on a daily basis- Monday through Friday.

*Factor 3: The nature and importance of the program, activity, or service provided by STAR to LEP Persons.*

Results: STAR supports people with intellectual and developmental disabilities. Transportation services are important to people with LEP in order to access the day programs and job search.

*Factor 4: Determine the resources available to assist LEP Persons and costs to the Agency.*

Results: STAR utilizes bi-lingual staff to translate as necessary for individuals served as well as their guardians.

Results: STAR also utilizes Ipads with “google translator”.

## **VI. Services to LEP Persons**

The Agency has identified its top language (Spanish) that STAR employees encounter when interacting with LEP persons. As a result, the Agency has established contacts for oral interpretation and written translation. In addition to the Agency’s top language, the contacts supports other languages as necessary. The need for interpretation and translation services for other languages will be assessed on an as needed basis using the four factor analysis.

The Agency will provide the following services to LEP persons:

Oral interpretation – The Agency will provide oral interpretation by staff or certified contractors. At the point of first contact with an LEP person, the Agency employee will: (1) determine whether the individual is an LEP person by determining his or her primary language; and (2) secure the appropriate language assistance service.

Written Translations –The Agency will translate documents determined to be vital.

If LEP person elects not to use the service provided, employees are to document the offer using Attachment #1.

## **VII. LEP Training for Agency Employees**

STAR employees will receive appropriate training on addressing language needs of LEP customers.

## **VIII. Communication Plan**

The Agency developed a communication plan to provide guidance to FSIS employees regarding how to ensure that interpreting and translating services are provided to LEP customers. See Attachment #2.

## **IX. Roles and Responsibilities FSIS**

### **Administrator**

1. Issue an annual LEP policy statement emphasizing the Agency’s commitment to ensuring that oral interpretation and written translation services are provided to persons with LEP.

2. Ensure that there is adequate funding and that other resources are available to provide effective and efficient oral interpretation and written translation services to LEP persons.
3. Coordinate the implementation of STAR's LEP plan Agency-wide.
4. Ensure the Agency maintains translation and interpretation resources that are available to Programs.
5. Provide guidance on how to utilize translation and interpretation services.
6. Serve as the point of contact to address compliance concerns from LEP persons.
7. Submit an updated LEP plan annually.
8. Ensure training is available to employees who interact with LEP persons.
9. Ensure the STAR's LEP plan is developed in accordance with Departmental Regulation 4330-005, Section 7b and submitted to the Office of the Assistant Secretary for Civil Rights (OASCR).

**STAR, Inc., Lighting the Way...**  
**LEP Release Acknowledgement Form**

I hereby affirm that I offered language assistance or interpreter services at no cost to \_\_\_\_\_ and the services were declined. I explained that the use of a family member or friend for the aforementioned services could result in a breach of confidentiality, violating his/her individual privacy, and could disclose sensitive and confidential information that he/she would not like disclosed.

Name (Printed): \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

**STAR, Inc., Lighting the Way...  
Limited English Proficiency (LEP)  
Communication Plan  
Guidance for Providing Services to  
LEP Customers**

**Purpose of Communication Plan**

It is STAR's policy to ensure that reasonable steps are taken to provide meaningful access and an equal opportunity to participate in services, activities, programs, and other benefits to individuals whose first language is not English. The purpose of this communication plan is to provide guidance to STAR employees regarding how to ensure that interpreting and translating services are provided to Limited English Proficient (LEP) consumers. For the purpose of the plan, LEP consumers are defined as individuals who conduct business with STAR who do not speak English as their primary language and have a limited ability to reason, speak, write or understand English. This plan does not apply to individuals who are employed by STAR.

This communication plan will ensure that oral interpretation and written translation of vital documents and other critical information is provided to LEP persons and/or their authorized representatives. All interpreters, translators, and other aids needed to comply with this plan will be provided without cost to the LEP customer. LEP customers and their authorized representatives will be notified of the availability of such assistance free of charge.

Language assistance for LEP customers will be available through the use of certified contractors that provide interpretation and translation services. In addition, LEP assistance may be provided by STAR employees who are bilingual in speaking the language being requested.

**Procedures for Providing Language Assistance to LEP Customers**

At the point of first contact with an LEP person, the STAR employee will determine whether the person has limited English proficiency by determining his or her primary language.

**LEP Training for STAR Employees**

This communication plan will be posted for the STAR workforce and should be used as guidance with respect to Agency employees' interactions with LEP customers. In addition, STAR employees will receive appropriate LEP training.

## **Notifying LEP Customers of Available LEP Services**

To ensure that LEP customers are aware of the interpretation and translation services that are made available by the Agency, FSIS will release:

1. Notifications on the Agency's web site.
2. Notifications to external groups and community-based organizations.
3. Publications such as articles in the Agency's newsletters.
4. Briefings to Agency leaders, managers, and supervisors.

## **Monitoring Language Services**

On an annual basis, STAR will assess the effectiveness of translation and interpretation services being provided to LEP customers and make changes or adjustments as necessary. The assessment will review complaints filed regarding LEP services, results from compliance reviews, and feedback received from LEP customers.

This communication plan is subject to change as necessary, in accordance with the needs of the Agency or the consumers being served.