Language Access Planning Tool

Background

All organizations and agencies who receive any federal support are **required** to ensure their customers with disabilities and those with limited English proficiency have access to vital information per Title II of the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166, Section 1557 of the Affordable Care Act and its implementing regulations (42 C.F.R. §92), RCW 49.60., and RCW 38.52.

Compliance obligations under Title VI of the Civil Rights Act, directs agencies to ensure meaningful access to information and provide language assistance services. During the COVID-19 pandemic, all of us have a responsibility to ensure that the information and services provided by the state to the public are accessible to all communities, regardless of language, disability status, or other factors.

□ Telephonic interpretation

Telephonic interpretation a service that allows for real-time, oral communication (over the phone) between two people. It is used throughout governmental organizations to increase access to services for people with limited English proficiency.

□ Choose a vendor

Your organization may already have a vendor. If not, you can search online for a vendor. State agencies, local governmental agencies, Tribal Entities, and registered 501(c)3 non-profit organizations are eligible to use the Washington State Department of Enterprise Services' master contracts. Learn more about the <u>master contract usage agreement</u> and contracts for <u>over-the-phone interpretation resources</u>.

□ Train staff

Train staff who answer external phone lines on how to use the service. Vendors often have training materials, but you can also use our <u>example instruction sheet</u>.

☐ Advertise the availability of telephonic interpretation services

At all points of contact where you advertise your call line, include in-language translated information about the availability of interpretation services. Pre-translated taglines are available for use from the <u>U.S. Department of Health and Human Services</u>. You can also print and use <u>communication cards</u> to facilitate language access requests.

☐ In-person interpretation

ASL interpretation is a critical service for ensuring access to for individuals who are deaf or hard-of-hearing. There is a <u>DES Master Contract</u> for Sign Language by independent contractor Interpreters. Programs may utilize the following resources to locate a vendor:

- DSHS List of Interpretation Vendors
- Washington State Coalition for Language Access Interpreter and Translator
 Directory

Our customers with disabilities have a right to ASL interpretation services if requested. Inperson interpretation for spoken languages is also very important for equitable access generally, however a remote-based option may be more appropriate due to COVID-19 precautions.

□ Translation

Federal guidance **requires** agencies to use competent translation services. While automated and machine translation technology (e.g., Google translate) is improving for more common languages, it does not guarantee quality and accurate translations. Mistranslation of critical information puts agencies at serious risk and can potentially lead to negative consequences for the health and safety of Washington families.

□ Choose a vendor

Your organization may already have a vendor. If not, you can search online for a vendor or utilize the <u>Washington State Department of Enterprise Services' master contract for translation</u> services, if your organization meets eligibility for the master contract usage agreement.

☐ Develop and use community tailored materials

- Partner closely with communities, community leaders, or community-based organizations to co-create messages and materials.
- Do your own research to better understand the community or intended audience their cultural beliefs, values, and practices related to the topic.
- Identify the top languages in the area (<u>OFM LEP population estimates</u>) and translate all materials and on-site signs. Search DOH <u>COVID-19 materials by language</u> and the <u>Partner Toolkit</u> for materials you can use.
- Print <u>communication cards</u> to facilitate communication with people who are deaf/hard of hearing and/or need to request an interpreter. Review <u>tips for using</u> communications cards.

☐ Prepping materials for translation

- 1. Ensure your communications and materials reach readability guidelines:
 - Grade level: Less than 6 percent
 - Reading ease: More than 45 percent
 - Passive sentences Less than 10 percent
- 2. Proactively remove culturally nuanced information in your communications (e.g. idioms) that may cause for inaccurate, culturally insensitive, or confusing translations.
- 3. Verify the images are culturally relevant.
- 4. Ensure all phone numbers are linguistically accessible. Verify all phone numbers listed in the material have telephonic interpretation services available. Include any specific instructions in the material the caller may need to know ahead of time and label all phone numbers with the availability of language assistance.
- 5. Collaborate with graphic designers. Content expands often with language translation. Plan ahead for about 20% expansion of text.
- 6. Update resources for all languages to ensure all links connect reader to same language content.
 - If the linked resource takes you to a multi-lingual resources, you can:
 - Update it. If the linked resource has information in the same languages you will be getting translations for, keep the link. Update your link (if needed) so it is taking the person directly to an in-language resource.
 - If the linked resource takes you to an English-only page, you can:
 - **Swap it out.** Find an alternative source available in additional languages.
 - Is there a translated, print publication that has similar information you can link to?
 - Does another agency or organization have similar, translated content you can link to?
 - **Summarize it.** Summarize the information that was available at the linked resource. If the page you were linked to has a few key points of information, write a summary and include it in your document/material/content for translation.
 - Replace it. Replace the linked resource with a phone number. If people will be able to access the same information by calling a phone number (that has telephonic interpretation services available), include that and indicate phone interpretation services are available.
 - **Delete it.** If the resource really does not add value, you can simply delete it (and consider deleting it from your English content too).
 - Label it. For any resource links that may not ensure a full access pathway, label the available languages in your content (e.g. only available in English, Spanish, and Russian).

☐ Map your access pathway

Map the entire experience for someone who has limited English proficiency and identify opportunities for improved language access.



- What information, forms, or materials does someone need each step of the way?
- What do they need to be able to communicate to the vaccine provider?
- What do you need to be able to communicate to them?
- ➤ Are all of the points of contact linguistically accessible?

□ Additional resources

- More information about culturally appropriate translation is available from the U.S.
 Department of Health and Human Services, Centers for Medicaid and Medicare Services,
 Toolkit for Making Written Material Clear and Effective.
- Department of Justice, <u>Tips and Tools for Reaching Limited English Proficient Communities</u> in Emergency Preparedness, Response, and Recovery.
- U.S. Department of Health and Human Services, <u>Understanding and using the "Toolkit</u> Guidelines for Culturally Appropriate Translation".
- Washington State Coalition for Language Access (WASCLA) website has I-speak cards and translator and interpreter directories.

