

POLICY AND PROCEDURES FOR COMMUNICATION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY

POLICY:

PARC will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of PARC is to ensure meaningful communication with LEP staff/clients and their authorized representatives involving the use of our services.

If needed, language assistance will be provided through use of competent bilingual staff or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

PARC will conduct a regular review of the language access needs of our service population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

PARC will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards.") to determine the language.

2. OBTAINING A QUALIFIED INTERPRETER

Human Resources is/are responsible for:

- (a)** Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
- (b)** Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- (c)** Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by PARC. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Minor children will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

When translation of vital documents is needed, each department in PARC will submit documents for translation into frequently-encountered languages to Human Resources.

4. PROVIDING NOTICE TO LEP PERSONS

PARC will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs will be

posted and provided in lobby areas and other points of entry, including but not limited to job sites with LEP employees. Notification will also be provided through our website and social media sites.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, PARC will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, PARC will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from staff and visitors.