Limited English Proficiency Policy

Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d provides that no person shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Options, Inc. will comply with the Title VI by ensuring 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 Options, Inc. is to ensure meaningful communication with LEP survivors and their authorized representatives involving their services.

The policy also provides for communication of information contained in vital documents, including but not limited to Crime Victims' Rights, consent to release information forms, and brochures. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person being served, and survivors and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All Staff, Board members, and volunteers will be provided notice of this policy and procedure, and staff or volunteers that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter or telephonic interpretation services.

Options, Inc. will conduct a regular review of the language access needs of our client population, as well as update and monitor the implementation of this policy and these procedures, as necessary. Staff will review this policy annually as part of the Civil Rights and Nondiscrimination policy review training. New staff will receive the training within 60 days of their start date.

Procedure

Identifying LEP Persons and their language

Staff or volunteers 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," available online at www.lep.gov) or posters to determine the language. In addition, when records are kept of past interactions with survivors, the language used to communicate with the LEP

person will be included as part of the record.

Obtaining a qualified interpreter

Staff are responsible for:

- Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff (and provide the list to the client);
- Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if such an employee is available and is qualified to interpret;
- Obtaining an outside interpreter if a bilingual staff or staff interpreter are not available or does not speak the needed language.
- When interpreters are not available, staff/volunteers can access LanguageLine Solutions at $3.95 per minute. The phone number is 800-752-6096. The cost of using the language line will be borne by Options, Inc. and not the survivor.
- Some LEP persons may prefer or request to use a family member or friend as an interpreter. Options will use these suggested acquaintances as interpreters only if specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge has been made by the agency. 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.
- Children and other survivors will not be used to interpret to ensure confidentiality of information and accurate communication.

Providing Written Translations

- When translation of vital documents is needed, staff will submit documents for translation into frequently encountered languages to the Executive Director, who will find a qualified translator. Original documents submitted for translation must be in final, approved form with updated and accurate legal and medical information.
- The agency will provide translation of other written materials if needed as well as written notice of the availability of translation, free of charge, for LEP individuals.
- Options' benchmarks for translation of vital documents according to the Safe Harbor guidelines provided by the Department of Health and Human Services are as follows:

- (a) Options will provide written translations of vital documents for each eligible LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally;
- (b) If there are fewer than 50 persons in a language group that reaches the five percent trigger in (a), the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.
- Current demographic data is available in Appendix C. As of 2022, no language group has reached the 5% or 1,000 persons benchmark for Options to provide translated documents in advance.

Providing notice to LEP persons

Staff and volunteers 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 intake areas and other points of entry.

Monitoring language needs and implementation

On an ongoing basis, Options, Inc. will assess changes in demographics, types of services, or other needs that may require reevaluation of this policy and its procedures. In addition, the agency 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, and feedback from survivors and community partners.

Appendix C

Options SDA Language Demographic Data:

2021												
County	**Pop +5 years**	**Total Span**	**Span SEVW**	**Total I-E**	**Indo-E SEVW**	**Total Asian**	**Asian SEVW**	**Total Other**	**Other SEVW**			
Cheyenne	2500	162	92	28	15	0		0				
Decatur	2625	66	41	17	14	15	15	0				
Ellis	27346	1061	851	389	325	391	259	36	16			
Gove	2570	5	5	13	13	4	4	8	8			
Graham	2344	6	6	24	24	5	0	3	1			
Logan	2572	63	43	34	23	20	14	6	2			
Norton	5099	118	82	9	9	38	38	0				
Osborne	3315	53	52	5	4	4	4	8	8			
Phillips	4733	60	36	24	9	21	9	0				
Rawlins	2369	98	71	14	14	6	4	23	23			
Rooks	4670	42	34	11	10	6	6	4	4			
Russell	6318	104	96	64	44	1	0	0				
Sheridan	2321	112	104	8	8	0		4	4			
Sherman	5582	410	361	87	87	35	35	16	16			
Smith	3385	17	14	32	31	1	0	5	5			
Thomas	7389	306	177	71	71	83	0	4	4			
Trego	2694	20	7	0		0		1	1			
Wallace	1422	39	13	2	2	0		0				
SDA Pop over 5 yrs	89254	2742	2085	832	703	630	388	118	92			
LEP Pop over 5 yrs	1054	**657**		**129**		**242**		**26**				
		Spanish Speakers who speak English less than "very well"		**Indo-European Language Speakers who speak English less than "very well"**		**Asian or Pacific Island Language Speakers who speak English less than "very well"**		**Other Language Speakers who speak English less than "very well"**				
SDA		**0.7361%**		**0.1445%**		**0.2711%**		**0.0291%**				
https://data.census.gov/table?t=Language+Spoken+at+Home&g=0400000US20_0500000US20023,20039,20051,20063,20065,20109,20137,20141,20147,20153,20163,20167,20179,20181,20183,20193,20195,20199&tid=ACSST5Y2021.S1601												
Data manually entered from above link to the American Community Survey #S1601 Language Spoken at Home, 5-Year Estimates Subject Tables												
Conclusion: Options' SDA has changed since the ACS Map App tool was developed; however, the overall distribution of LEP persons has not.												