



City of Revere

Office of Diversity, Equity, and Inclusion

Language Access Plan

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Definitions

“Interpretation” shall mean the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the meaning.

“Language Access Plan” or “LAP” shall mean set of policies and procedures established by the city to provide, at no charge, the most effective services for members of the public with Limited English Proficiency whenever appropriate or requested.

“Language justice” shall mean the right for all people to communicate in the language they prefer.

“Limited English Proficiency” or “LEP” shall describe an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. LEP individuals may be competent in English for certain types of communications (e.g., speaking or understanding), but still LEP for other purposes (e.g., reading or writing).

“Meaningful access” shall mean a language assistance that results in accurate, timely, and effective communication with the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

“Source language” shall mean the language from which text must be translated, or from which communication must be interpreted.

“Target language” shall mean the language that an individual uses most frequently or comfortably to communicate with.

“Translation” shall mean the replacement of written text from one source language into an equivalent written text in the target language.

“Vital document” shall mean any document that contains information that is critical for obtaining city services and/or benefits. Vital documents include, for example: applications; consent forms; notices of disciplinary action; and, notices advising LEP persons of the availability of free language assistance. Non-vital information includes documents that are not critical to access such benefits and services.

Note about Cultural Nuance: Successful translation and interpretation services achieve meaning and ease of understanding for the target audience and avoid literal conversions from English to other languages. As such, it is important that language services providers understand

the cultural nuances of the target language community. These can include cultural awareness of speech and behavior differences; hierarchy of power and communication barriers to highlight similarities and differences between the target and home culture; the ability to promote meaningful dialogue regarding cultural challenges in the workplace; discuss factors that may affect family, personal, and business relationships; and run interactive simulations that reflect a realistic situation in the business setting.

Introduction

Purpose

The city's mission is to deliver high quality and efficient municipal services to the residents and business owners who reside here. To achieve this goal, the city must continue to strengthen connections with historically disengaged and marginalized populations and reduce barriers to participation. One crucial step towards this end is ensuring meaningful access to city information and services, regardless of language. The City of Revere is increasingly aware of the communication gap with limited English proficient (LEP) residents. Communications that are accessible to the whole community will help Revere be more inclusive and welcoming to all. In addition to advancing the city's internal goal, language access is required in order to meet the city's civil rights obligations associated with the receipt of funding from the federal government, specifically the Department of Housing and Urban Development. The goal is that "no person – on the ground of race, color, or national origin – is excluded from, denied benefits of, or subjected to discrimination under any services receiving federal financial assistance." Review the Department of Housing and Urban Development's "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" Notice" and see Appendix A for additional literature.

Language access offers a vision of society that honors the city's mission of serving all people, and further alters institutions to provide space for full democratic participation. When we ground our work in the practice of language access, we bring the city's messages and services to more people. When we as organization members, community leaders, organizers, and allies can express ourselves in the language in which we feel most articulate and powerful, we can communicate with greater precision, and we can relate to one another in deeper, more democratic and equitable ways.

Developing the Language Access Plan

In developing the Language Access Plan (LAP), The City of Revere completed a needs assessment, gathered information, and reviewed language assistance services. Our process for developing the LAP is outlined below.

This plan is guided by the [Four Factor Analysis](#) that assesses the city based on an analysis that balances the factors provided herein, without imposing undue financial burdens, and in accordance with the U.S. Department of Housing and Urban Development (HUD) LEP guidance. The Four Factor Analysis provides reasonable steps to provide meaningful access to the City of Revere's services to LEP persons. There shall be an annual review of the data collected pursuant to the provisions of the Four Factor Analysis provided herein.

The Four Factor Analysis is as follows:

1. The number or percentage of LEP persons eligible to be served or likely to be served as informed by census data or other relevant data (see Appendix C for most recent American Community Survey data regarding LEP demographics in Revere), which currently informs the city's analysis. The city will annually re-assess the number and percentage of LEP persons eligible to be served by its programs and update or supplement Appendix C accordingly to more accurately reflect and account for the experience of changing demographics and other factors.
2. Frequency with which LEP persons come into contact with the service, program, or activity;
3. Nature and importance of the public meeting, process or document; and,
4. Available resources and cost.

While all aspects of the city's programs and activities are important, the Four-Factor analysis allows for prioritization so that language services are targeted where most needed because of the nature and importance of the particular activity involved. The greater the number of LEP individuals, the greater the frequency of contact with the city, and the greater the importance of the service, the more likely language services will be needed.

Approaches to providing language assistance

With the data collected from residents, there are a variety of established language assistance approaches that the city can use to meet the evolving language needs of the community. The most common approaches include:

- In-person interpretation, otherwise known as face-to-face or on-site interpreting, is when a qualified interpreter, who is present, listens to communication in one language and orally converts it into another language (either consecutively or simultaneously) while retaining the meaning.
- Remote interpretation (e.g. telephonic, video) is when a qualified interpreter, who is on the phone or connected in video by remote technology, listens to communication in one language and orally converts it into another language (either consecutively or simultaneously) while retaining the meaning. Translation of written materials works to successfully decipher the meaning of written content from a source language into the language that is targeted.

Procedures for determining the need for language assistance

The procedures detailed below provide a general summary of how language assistance will be provided by the city.

A. Interpretation services (oral language)

LEP individuals should be informed that the city will provide free access to oral interpretation services through multilingual city staff or qualified, trained organizations or contractors, as needed. From time to time, the city may utilize interpretive technology via the web or a phone-based service. Oral interpretation should be provided in a timely manner (must not effectively deny or cause an undue burden or delay relating to important services, benefits, or rights) and should only be provided by competent interpreters.

If the LEP individual does not wish to use the free interpretation services advertised by the city, the LEP person may provide their own interpreters at their own expense. Staff are advised to be alert to the potential for any conflict of interest or competency issues that may arise from the involvement of family or friends being utilized as an interpreter. If city staff have questions about the appropriateness of allowing family or friends act as interpreters, they should consult with the Language Access Specialist for guidance.

1. When in contact with the resident:

Staff shall make reasonable efforts to assess the need for language assistance. They can determine language assistance needs in several ways, including:

- a. Self-identification by the LEP individual;
- b. Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services; and
- c. The City of Revere will post and make available “I Speak Cards” also known as “Language Identification Flashcards.” These shall be located at the front desk(s) of all public-facing departments. Census data mentioned as part of the Four-Factor Analysis shall be used to determine which languages are included on the “I Speak Cards.”

2. At public meetings:

- a. Notice of interpreter availability for public meetings will be included in public notices before the meeting. Census data mentioned as part of the Four-Factor Analysis shall be used to determine into which languages the availability on interpretation notice is translated. Individuals will be asked to give at least two (2) business days' notice to allow adequate time for scheduling interpreters for the requested meeting.
- b. If an LEP individual arrives at a public meeting without providing notice to the city, staff will make their best effort to provide access to language assistance. However, due to limited notice, service may not be available in such cases.
- c. If a city department is planning a community meeting where they expect community members from an LEP population to attend, staff shall secure

appropriate language services in advance of the meeting. For these meetings, staff should advertise the availability of language services in multilingual outreach materials.

- d. If the language requested is not available through a local language service, city staff shall work with the requesting individual to determine what options are available.

3. For one-on-one and small-group interactions

The city requests that LEP individuals give at least 2 business days' notice to allow adequate time for scheduling interpreters for the requested meeting. If the language requested is not available through a local language service, city staff will use a web-based service.

B. Translation services (written language)

The City of Revere should strive to translate documents vital to meaningful program access as resources permit and in consideration of the four factors outlined above. HUD guidance states that if an administering agency provides written translation of vital documents into languages encountered by 5% or 1000 people, whichever is less, of the population of persons eligible to be served or likely to be encountered, this will constitute strong evidence that the administering entity has taken reasonable steps to address the language needs of LEP persons in its service area. HUD regards vital documents as “any document that is critical for ensuring meaningful access to the recipients’ major activities and programs by beneficiaries generally and LEP persons specifically” (“Department of Housing and Urban Development: Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Notice.” Federal Register 72: 2732-2754 (1/22/2007)). Meaningful program access generally requires awareness of, and ability to participate in, procedures for applying to the program, meeting the program's requirements, and enjoying the program's benefits. Meaningful program access also requires awareness of rights and services; otherwise, LEP persons may effectively be denied such access.

1. Written or “vital documents” include but are not limited to:
 - o Consent and complaint forms;
 - o Intake forms with the potential for important consequences;
 - o Written standard notices of rights, denial, loss, or decreases in benefits or services, and other hearings;
 - o Notices advising LEP persons of free language assistance;
 - o Notices of public hearings; and/or
 - o Applications to participate in a city program or activity or to receive benefits or services.
2. *Legal documents*: In the case of legally binding documents such as a Notice of Claim response or a contract, although a translated copy of the document should be provided, the English version of the document is the one that is legally binding and considered the

official document. The translated document is to be used as a reference tool only. A brief statement should be included on these documents in the language which the document has been translated into which states “This document is for informational purposes only. The English version of this document is considered the legally binding document.”

Procedures for city staff requesting interpretation & translation

How to request interpretation or translation services:

The Office of Diversity, Equity, and Inclusion (DEI) will assist departments in scheduling interpretation & translation services as needed.

The city will use a variety of interpretation and translation services, including:

1. Professional interpretation and translation through contract services with local language service organizations;
2. Professional remote interpreters; and
3. Trained city staff.

City staff should allow as much time as possible in advance of needed language services to secure interpretation and translation services.

The following are the guidelines for staff scheduling **interpretation** through the Language Access Specialist:

- Non-immediate requests must be made using the [Staff Translation/Interpretation Form](#) which is available on the [revere.org](#) website, and linked here;
- Requests shall be made no less than two weeks in advance of the requested date. Any request made within two weeks of the requested date must be submitted in writing via email to the Language Access Specialist, including the requester’s Department Head or Supervisor. Prioritization for the type of interpretation service:
 1. For City Hall business during the workday the Language Access Specialist will first look to trained, multilingual city staff. If city staff are not available, an in-person, contracted interpreter is the second preference. If neither of the above is available, the Language Access Specialist will refer to web-based interpretation.
 - a. There are many new and emerging web- and computer-based tools that can be used to help with interpretation and translation. When used appropriately, these programs can help reduce costs and decrease the amount of time needed to interpret or translate; however, the city is mindful of the limitations of this

resource. Software or online applications that automatically translate written material or interpret oral communication without the involvement of a human review can be helpful, however the translated or interpreted product is often less accurate and reliable than what is provided by a qualified human translator or interpreter. Web-based tools often translate or interpret word-for-word and fail to account for slang, nuance, colloquialisms and terms of art. These tools should be used as a last resort for interpretation. Web-based tools should not be used for vital document translation without the review of a qualified translator.

2. For public events and other city-related meetings that are outside the scope of a regular workday, the Language Access Specialist will look to in-person, contracted interpreters as the first preference.

The following are the guidelines for staff scheduling **translation** through the Language Access Specialist:

- Non-immediate requests must be made using the “Staff Interpretation/Translation Request Form” which is available on the revere.org website, and linked here;
- Requests for translation of documents two (2) pages or less shall be made no less than one (1) week in advance of the date by which the translated version(s) is needed. Any request made within one week of the requested date by which the translated version(s) is needed must be submitted in writing via email to the Language Access Specialist, including the requester’s Department Head or Supervisor.
- Requests for translation of documents three (3) pages or more shall be made no less than two (2) weeks in advance of the date by which the translated version(s) is needed. Any request made within two weeks of the requested date by which the translated version(s) is needed must be submitted in writing via email to the Language Access Specialist, including the requester’s Department Head or Supervisor.

Staff training and coordination

The city will provide training for all city staff to familiarize departments with the LAP policies and procedures. This training shall include, but not be limited to, topics such as:

1. An overview of the LAP
2. Skill building on how to identify an individual’s primary language, respond to LEP callers, obtain language assistance services, work with an interpreter, etc.

All new employees will receive language access and assistance training as part of orientation.

Language assistance training will be updated annually with the Plan, regarding changes in demographic and community data. The City of Revere shall conduct periodic quality control reviews to ensure that staff are implementing the LAP appropriately (e.g. sending exit surveys to residents who received the language assistance).

Additional staff training

Additional training shall be provided for staff and employees who:

1. have frequent interaction with residents or LEP individuals
2. are multilingual staff and provide translation or interpretation services as part of their job

These trainings may be more focused on topics that will assist staff in effectively interacting with LEP individuals.

The Language Access Specialist, in coordination with Human Resources, will maintain records of employee participation in these staff training sessions.

Carrying out the Language Access Plan

Monitoring and Updating the Language Access Plan

The city's Policy shall be reviewed annually in June to assess its relevance and effectiveness. Staff's annual monitoring of the policy will include a review of:

1. Data related to the number of residents who are LEP; Reporting on the use of city's language services;
2. Reporting on city staff's capacity to serve LEP residents, including but not limited to reviewing the language competency of city employees and training of city employees;
3. Feedback from residents who are LEP, community-based organizations, and other engaged groups, regarding the effectiveness of the LAP and the Office of Diversity, Equity, and Inclusion staff who maintain the LAP; Review of the city's interpretation and/or translation contract(s) with third parties;
4. Review of city engagement strategies and communication pathways advertising language access and assistance.

Language Access complaints

Complaints regarding an alleged failure by the city to adhere to this LAP may be filed with the Language Access Specialist.

Written complaints can be submitted to:

Attn: Asmaa Abou-Fouda

Office of Diversity, Equity, and Inclusion
281 Broadway
Revere, MA 02151
Or via email at aabou-fouda@revere.org

Neither notice to the Language Access Specialist nor action taken by the Language Access Specialist shall toll any legal or applicable statute of limitations for a claim of discrimination or violation of civil rights.

To file a complaint with the Massachusetts Commission Against Discrimination (MCAD), please visit their website at www.mass.gov/file-a-complaint-of-discrimination. If you need an interpreter, please call the MCAD Language Access Line at (617) 994-6071.

To file a complaint with the Office of Fair Housing and Equal Opportunity (FHEO), please visit their website at www.hud.gov/fairhousing. If you need an interpreter, please call an FHEO intake specialist by calling 1-800-669-9777.

Boston Regional Office of FHEO
617-994-8300
800-827-5005

Appendix A

Section 1. Executive Order 131666

Executive Order 13166 of August 11, 2000 Improving Access to Services for Persons With Limited English Proficiency By the authority vested in me as President by the Constitution and the laws of the United States of America, and to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP), it is hereby ordered as follows: Section 1. Goals. The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English language. The Federal Government is committed to improving the accessibility of these services to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. To this end, each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. Each Federal agency shall also work to ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their LEP applicants and beneficiaries. To assist the agencies with this endeavor, the Department of Justice has today issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. As described in the LEP Guidance, recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Sec. 2. Federally Conducted Programs and Activities. Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans. Sec. 3. Federally Assisted Programs and Activities. Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order, Aug 15, 2000, each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its

guidance document in the Federal Register for public comment. Sec. 4. Consultations. In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented. Sec. 5. Judicial Review. This order is intended only to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person. THE WHITE HOUSE, August 11, 2000. œ–

Appendix B

Department of Housing and Urban Development: Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Final Notice.

<https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf>

Appendix C

Section 1. Standards of Thresholds

Below is the most recent American Community Survey data regarding LEP demographics in Revere. The threshold for translation is for languages encountered by 5% or 1000 people who “speak English less than very well.” Data can be found at <https://www.census.gov/programs-surveys/acs/data.html>, and at https://data.census.gov/profile/Revere_city,_Suffolk_County,_Massachusetts?g=060XX00US2502556585

Table: ACSDT5Y2015.B16001

	Revere city, Suffolk County, Massachusetts	
Label	Estimate	Margin of Error
Total:	49,756	±417
Speak only English	25,600	±1,212
Spanish or Spanish Creole:	12,057	±901
Speak English "very well"	5,924	±732
Speak English less than "very well"	6,133	±819
French (incl. Patois, Cajun):	235	±160
Speak English "very well"	223	±156
Speak English less than "very well"	12	±19
French Creole:	499	±354
Speak English "very well"	348	±265
Speak English less than "very well"	151	±106
Italian:	1,466	±306
Speak English "very well"	925	±273
Speak English less than "very well"	541	±184
Portuguese or Portuguese Creole:	1,726	±521
Speak English "very well"	918	±375
Speak English less than "very well"	808	±286
German:	50	±46
Speak English "very well"	50	±46
Speak English less than "very well"	0	±28
Yiddish:	0	±28
Speak English "very well"	0	±28

Table: ACSDT5Y2015.B16001

Revere city, Suffolk County, Massachusetts		
Label	Estimate	Margin of Error
Speak English less than "very well"	0	±28
Other West Germanic languages:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Scandinavian languages:	8	±14
Speak English "very well"	8	±14
Speak English less than "very well"	0	±28
Greek:	28	±34
Speak English "very well"	10	±16
Speak English less than "very well"	18	±30
Russian:	288	±196
Speak English "very well"	136	±95
Speak English less than "very well"	152	±120
Polish:	36	±30
Speak English "very well"	22	±20
Speak English less than "very well"	14	±16
Serbo-Croatian:	576	±391
Speak English "very well"	287	±199
Speak English less than "very well"	289	±264
Other Slavic languages:	27	±42
Speak English "very well"	20	±31

Table: ACSDT5Y2015.B16001

Revere city, Suffolk County, Massachusetts		
Label	Estimate	Margin of Error
Speak English less than "very well"	7	±12
Armenian:	48	±70
Speak English "very well"	29	±43
Speak English less than "very well"	19	±27
Persian:	94	±115
Speak English "very well"	16	±26
Speak English less than "very well"	78	±95
Gujarati:	41	±69
Speak English "very well"	41	±69
Speak English less than "very well"	0	±28
Hindi:	239	±229
Speak English "very well"	169	±204
Speak English less than "very well"	70	±85
Urdu:	193	±147
Speak English "very well"	71	±61
Speak English less than "very well"	122	±122
Other Indic languages:	127	±150
Speak English "very well"	79	±90
Speak English less than "very well"	48	±68
Other Indo-European languages:	913	±471
Speak English "very well"	411	±209

Table: ACSDT5Y2015.B16001

Revere city, Suffolk County, Massachusetts		
Label	Estimate	Margin of Error
Speak English less than "very well"	502	±312
Chinese:	420	±210
Speak English "very well"	294	±192
Speak English less than "very well"	126	±84
Japanese:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Korean:	126	±164
Speak English "very well"	90	±110
Speak English less than "very well"	36	±61
Mon-Khmer, Cambodian:	962	±327
Speak English "very well"	368	±151
Speak English less than "very well"	594	±248
Hmong:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Thai:	17	±19
Speak English "very well"	5	±10
Speak English less than "very well"	12	±20
Laotian:	43	±70
Speak English "very well"	43	±70
Speak English less than "very well"	0	±28

Table: ACSDT5Y2015.B16001

	Revere city, Suffolk County, Massachusetts	
Label	Estimate	Margin of Error
Vietnamese:	699	±359
Speak English "very well"	242	±164
Speak English less than "very well"	457	±258
Other Asian languages:	112	±166
Speak English "very well"	112	±166
Speak English less than "very well"	0	±28
Tagalog:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Pacific Island languages:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Navajo:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Native North American languages:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Hungarian:	11	±18
Speak English "very well"	0	±28
Speak English less than "very well"	11	±18
Arabic:	2,865	±655

Table: ACSDT5Y2015.B16001

Revere city, Suffolk County, Massachusetts		
Label	Estimate	Margin of Error
Speak English "very well"	1,115	±330
Speak English less than "very well"	1,750	±518
Hebrew:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
African languages:	250	±149
Speak English "very well"	205	±135
Speak English less than "very well"	45	±43
Other and unspecified languages:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28