

Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance

Part A: Self Assessment		
Section I: Demography		
<p>Has your organization developed a demographic profile of the population served or likely to be served by your Federally funded programs and activities?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>By primary language spoken? If yes, list language groups and languages spoken.</p> <p>The primary language spoken by the population served or likely to be served by SPAN is English, closely followed by Spanish. 33% of New Jersey’s children have immigrant parents, and 25% of New Jerseyans speak a language other than English at home. 48% of the over 2,000,000 New Jerseyans who speak a language other than English at home speak Spanish. While the next set of languages spoken at home include Indian languages, Italian, Chinese, and French/Haitian Creole, most of the people who speak these languages at home also speak English, except for those who speak French/Haitian Creole. The NJ Department of Education has determined that the families in New Jersey who are least likely to read and/or speak English who are literate in non-English languages speak Spanish, Arabic, Korean, and Portuguese. (Note: While there are several Chinese dialects, there is only one written Chinese language, Mandarin, which is the language of the “educated classes” in China. There are many Chinese-speaking families in New Jersey who are not literate in Mandarin Chinese).</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Is your institution working with any community-based organizations that are familiar with the language needs of individuals participating in any of your programs and activities, or to whom you provide services or encounter? If yes, describe.</p> <p>SPAN is a member of the NJ Immigration Policy Network, the statewide organization that includes immigrant organizations representing all of New Jersey’s immigrant communities. SPAN is collaborating with the NJ Immigration Policy Network on a project to provide training to immigrant parents in the 80+ New Jersey districts that are required to have a Bilingual Parent Advisory Council. SPAN also works closely with the Hispanic Directors Association, the membership organization of the Hispanic-led non-profit organizations in New Jersey. SPAN also partners with the 40+ Family Success Centers that provide services to families in New Jersey’s poorest communities; many of the Family Success Centers are housed at organizations that serve a large % of immigrant families. SPAN also works with the Chinese Autism Center.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section II: Frequency of Contact		
<p>Does your organization have a process for surveying, collecting and/or recording primary language data for individuals that participate in your program and activities? If yes, describe the categories used in the collection of data, where the data resides, and who can access the data.</p> <p>SPAN has a contact management system that collects information on primary languages spoken by families who are assisted by telephone or in-person technical assistance and who participate in workshops. The categories used in the contact management system include language spoken, by language. The data resides in the CMS and can be accessed by the Management Team (Co-Directors, Legal/TA Director, Director of Parent & Professional Development, and Office Systems Manager).</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section III: Importance

Do you conduct compulsory activities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Do you conduct involuntary programs or activities (like custodial interrogations, hearings, trials, evictions, etc.) or provide compulsory education or other mandatory programs or activities? If Yes, what are they?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you conduct programs or activities that have serious consequences, either positive or negative, for a person who participates (including but not limited to health, safety, economic, environmental, educational, law enforcement, housing, food, shelter, protection, rehabilitation, discipline, transportation, etc.)? If Yes, what are they?</p> <p>SPAN conducts numerous programs and activities that have serious consequences. SPAN is the designated Parent Training and Information Center for NJ, funded by the US DOE to provide information, training, and TA to families of infants, toddlers, children, youth and young adults with disabilities in the early intervention and special education systems; we are the only PTI in NJ, so families who need this information rely on SPAN to provide it. SPAN is also the designated Family to Family Health Information center, funded by the US DHHS to provide information, training, and TA to families of infants, toddlers, children, youth and young adults with special health care needs regarding access to health insurance, health care, and community based services; we are the only F2F HIC in NJ, so families who need this information rely on SPAN to provide it. SPAN is also a designated enroller of immigrant children and families in NJ Family Care/State Children’s Health Insurance Program (funded by US DHHS CMS). SPAN also houses Family Voices-NJ, the Federation of Families for Children’s Mental Health chapter, the Statewide Parent to Parent program, the State Implementation Grant for Integrated Community-Based Systems of Care for Children and Youth with Special Healthcare Needs (funded by US DHHS MCHB) and Military Family 360 Support Project (funded by US DHHS ADD); families rely on each of these programs to provide information, training, technical assistance, and support across all of the systems that impact children and families.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Have you determined the impact on actual and potential beneficiaries of delays in the provision of services or participation in your programs and/or activities (economic, educational, health, safety, housing, ability to assert rights, transportation costs, etc.)? If Yes, what are they?</p> <p>If families who speak languages other than English cannot participate in SPAN programs or activities, there are likely to be significant negative impacts on the education, health, access to human services, and ability to assert rights of such families and their children, as SPAN serves as a “one-stop” for families across the systems that impact their children. SPAN provides more training for and more technical assistance to families than any other organization in the state.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section IV: Resources

Have you identified resources needed to provide meaningful access for LEP persons?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Are those resources currently in place?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Is there a staff member in your organization assigned to coordinate language access activities? If Yes, identify by name or title, etc.</p> <p>Mercedes Rosa, director of SPAN’s F2F HIC and CHIPRA Immigrant Outreach & Enrollment Project, coordinates SPAN’s Culturally Competent Outreach & Support activities, including use of the Traducelo Ahora web-based Spanish translation (website and email) program, under the supervision of SPAN’s Executive Co-Director, Diana Autin and in collaboration with SPAN’s other Executive Co-Director, Debra Jennings, as well as the other members of the Management Team (Albert Pelham, Office Systems Manager; Martha Brecher, Legal & TA Director; and Carolyn Hayer, Parent & Professional Development Director)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section IV: Resources, continued

<p>Have you identified the points of contact where an LEP person interacts with your organization? If yes, please describe.</p> <p>SPAN has identified the following points of contact where an LEP person is most likely to interact with our organization: calling the 800#; coming into the main office or our satellite office in Paterson; participating in a workshop; accessing our website; meeting with Family Resource Specialists in the county Special Child Health Services Case Management Units; coming into contact with our field-based CHIPRA Immigrant Outreach & Enrollment staff.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Given the identified points of contact, is language assistance available at those points? If Yes, please describe.</p> <p>Language assistance is available at the identified points of contact as follows: SPAN has bilingual staff in the main office and Paterson satellite office speaking English and Spanish, and Haitian Creole in the main office. SPAN uses the Language Line for TA staff to assist families who do not speak English. SPAN uses Traducelo Ahora for Spanish-language website access and email TA to families speaking Spanish. SPAN uses free web-based language translation programs for over ten other non-English languages spoken/read in NJ; access to these programs is available on SPAN's website just below the website heading (Arabic, Chinese-Simplified & Mandarin, French, German, Hindi, Italian, Korean, Polish, Portuguese, and Russian). SPAN's CHIPRA Immigrant Outreach & Enrollment Project has bilingual staff speaking the following languages: Spanish, French/Haitian Creole, Portuguese, Chinese, and the Indian languages of Gujarati, Hindi & Tamil. SPAN translates most of our materials into Spanish. Basic information such as a parent guide and powerpoint presentations on the language access rights of immigrant parents and the rights of immigrant children to education, bilingual education, and special education are available in Spanish, Haitian-Creole, Arabic, Portuguese, Chinese, Korean, and Gujarati. Our Parent to Parent Support Parent manuals are available in Spanish, Chinese, and Haitian-Creole. SPAN also has relationships with community-based immigrant organizations that will assist us when we provide in-person TA to non-English speaking families.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>By languages spoken, how many employees in your organization fluently speak a language other than English?</p> <p>A total of 17 SPAN staff speak languages other than English fluently, including 2 who can sign fluently. SPAN also contracts with the Multi-Lingual Center at El Club de Padres in Paterson to provide bilingual training and technical assistance to families statewide.</p>	<p>#: 10 2 2 1 1 1</p>	<p>Languages: Spanish Indian Sign Portuguese French Chinese</p>
<p>What percent of the total employees in your organization are bilingual and able to competently assist LEP persons in the LEP person's language?</p>	<p>31%</p>	
<p>Do you utilize employees in your organization as interpreters? (Interpreting is a different skill than being bilingual and able to communicate monolingually in more than one language).</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Employees within our organization provide interpreter services (check one):</p> <p>We sometimes use Spanish-speaking staff to interpret with families working with non-Spanish speaking TA staff.</p>	<input type="checkbox"/> Some time <input type="checkbox"/> All the time	<input type="checkbox"/> Always <input type="checkbox"/> Never
<p>What are the most common uses by your organization of other than employee (outside sources) language interpreter services?</p> <p>SPAN utilizes the Language Line professional interpretation services to assist us in interpreting for families who speak languages other than the languages spoken by TA staff, or when those staff are not available when the family needs assistance. SPAN also utilizes web-based language translation programs for our website.</p>		

<p>What outside sources for interpreter services do you use?</p> <p>Language Line, community based immigrant organizations</p>	<input type="checkbox"/> Contract <input type="checkbox"/> Telephone	<input type="checkbox"/> CBOs <input type="checkbox"/> Language banks
<p>For what languages other than English are outside sources of language interpreters most commonly used? Please list. If so, how?</p> <p>SPAN utilizes the Language Line professional interpretation services to assist us in interpreting for families who speak languages other than the languages spoken by TA staff, or when those staff are not available when the family needs assistance. SPAN also utilizes web-based language translation programs for our website.</p>		
<p>Although you should not plan to rely on LEP person’s friends, family members, or other informal interpreters to provide meaningful access, are there times when you allow use of such informal interpreters? If Yes, under what circumstances?</p> <p>SPAN does not rely on LEP person’s friends, family members, or other informal interpreters to provide meaningful access.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Are minors used as interpreters? If Yes, under what circumstances and how are issues such as competency, appropriateness, confidentiality, and voluntariness assessed?</p> <p>Minors are not used as interpreters.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>If additional resources are needed to ensure meaningful access, have you identified the cost of those resources?</p> <p>Additional resources would allow SPAN to translate more documents into more languages. In order to translate all relevant and important SPAN resources into all the languages spoken by NJ families, it could cost as much as \$50,000 or more. However, in NJ, the vast majority of families who speak a language other than English at home and who do not speak English, speak Spanish.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Are there any limitations in resources (dollars and personnel) that could impact the provision of language assistance services?</p> <p>SPAN’s resources to provide language assistance services are based on our grants, contracts, fee-for-service, contributions, and other income. SPAN contracts with the Language Line and does not limit the amount of resources committed to use of the Language Line so that families can receive unlimited access to technical assistance in their language. SPAN writes translation costs into virtually all of our grant applications and fee-for-service activities (\$15,000/year), and routinely translates documents into Spanish using our own staff. Documents for our CHIPRA Immigrant Outreach and Enrollment Project are translated into multiple languages. Parents can also translate materials from our website using the online translation programs provided on our website. SPAN hires staff who speak languages other than English, but does not have the resources to hire staff who speak all of the 100+ languages spoken by NJ families.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>If so, have you explored all options available to you in order to ensure the provision of language assistance services?</p> <p>SPAN uses the Language Line for interpretation and web-based translation programs, and collaborates with community-based immigrant organizations that serve families speaking multiple non-English languages to provide language assistance services.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Part B: Developing a Language Assistance Plan		
Section II: Planning		
Have you developed a comprehensive plan for language assistance to LEP persons?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does your organization have a written policy on the provision of language interpreter and translator services? See attached.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If so, is a description of the policy made available to the general public? If so, how and when is it made available? In what languages other than English is it made available? To date, the description of the policy on the provision of language interpreter and translator services has not been specifically made available to the general public. However, translation services are available on the home page of SPAN’s website, and the Information section of SPAN’s website indicates that bilingual information, training, and TA is available. The Support section of SPAN’s website indicates that SPAN offers emotional support and information to parents through a “bilingual, multi-racial staff of parents of children with and without disabilities.” SPAN offers an archived workshop series on education advocacy on SPAN’s website in Spanish. SPAN’s priority as stated on our website, in our brochures, etc., also indicates that SPAN’s greatest priority is “children and youth with the greatest need due to disability, poverty, discrimination based on race, sex, or <i>language, immigrant</i> or foster care <i>status</i> , geographic location, or other special circumstances.” SPAN’s brochures are available in English and Spanish, letting families know of our commitment to ensure language access. All of SPAN’s training and conference outreach materials include notice that simultaneous translation is available.	<input type="checkbox"/> Yes <input type="checkbox"/> To some extent	<input type="checkbox"/> No
Do you inform your employees of your policies regarding LEP persons? If so, how? How often? Our policy regarding language access for LEP persons is discussed with staff at least once each year at one of our quarterly All Staff meetings. Staff are also informed of the policy whenever a job opening is announced because all job openings indicate that bilingual persons are encouraged to apply and are preferred. SPAN Project Directors and Coordinators are aware of the policy that new materials developed by their project should at least be translated into Spanish as soon as the material has been developed. Further, iIn the past year, SPAN staff also engaged in the piloting of the Cultural and Linguistic Competence Self-Assessment for Family Organizations developed by the National Center for Cultural Competence and identified areas of SPAN’s strength and areas for improvement for language access.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Do you inform your subcontractors of their obligation to provide language assistance to LEP individuals who either participate in their programs and activities and/or to whom services are provided? If so, how? How often? In the contracting process, we notify subcontractors of this obligation.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Do your subcontractors have a written policy on the provision of language interpreter and translator services? All of SPAN’s subcontractors are recipients of federal financial assistance through state grants and contracts and thus are required to have a written policy on the provision of language interpreter and translator services.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If so, is it distributed to the general public? If so, when and how is it made available? In what languages other than English is it made available?	<input type="checkbox"/> Yes <input type="checkbox"/> Do not know	<input type="checkbox"/> No

<p>This past year is the first year that SPAN had major subcontractors other than the MultiLingual Center of El Club de Padres. SPAN’s Executive Co-Director requested a copy of the written policy of each of SPAN’s new subcontractors (PCORE/AAP-NJ, NJ Central NJ Maternal & Child Health Consortium, & Visiting Nurse Association of Central Jersey) as well as information on its distribution, and is awaiting their response.</p>		
<p>Are beneficiaries informed that they will be provided interpreting services at no cost? How are they informed and at what points of contact?</p> <p>Beneficiaries who do not speak English are informed that they will be provided interpreting services at all points of contact, but are not specifically informed that it will be at no cost to them. The information section of our website also indicates that bilingual TA is available, but doesn’t specifically indicate it is provided at no cost. However, all services are provided at no cost to beneficiaries.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you ensure that your translators and/or interpreters are qualified to provide interpreting services (which is a different skill than being bilingual) and understand any confidentiality requirements? If so, how?</p> <p>SPAN uses a professional interpretation service, the Language Line, for TA services; our contract with them specifies the need for confidentiality and they contract to provide interpreting services by trained interpreters. SPAN uses trained interpreters to interpret at our conferences; they do not translate confidential information. Our Spanish language translation is primarily done by a skilled Spanish language translator who is on our staff; as a SPAN staff person, she signs a commitment to maintain confidentiality that is contained in our Personnel Manual.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Is ability to speak a language other than English a factor in hiring decisions in your organization? If yes, how do you identify which languages are needed?</p> <p>SPAN’s job notices indicate that SPAN is an affirmative action/equal employment opportunity employer and that bilingual staff are preferred for positions such as TA positions where bilingual capacity is most critical. We identify the languages that are needed by looking at the relevant demographic data.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you ensure that your bilingual staff is qualified to provide services in another language? If Yes, how?</p> <p>All but two of SPAN’s bilingual staff have the non-English language as their first language. Two other of SPAN’s bilingual staff need to improve their English language capacity but are fully qualified to provide services in their language of origin.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you provide written materials to the public in languages other than English?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Is the public notified of the availability of the translated materials? If Yes, how?</p> <p>The public is notified of the availability of translated materials through information on the home page of SPAN’s website which contains the information on Traducelo Ahora and the other web-based language translation programs available to translate materials from our website. The public is also notified by our list of publications which indicates the languages in which the publications are available (generally Spanish). Families who contact our TA line are also informed of the availability of translated materials by the TA providers.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>List all written materials provided to the public in languages other than English and the languages for which they are available.</p> <p>Spanish: Most of SPAN’s materials are made available to the public in Spanish, either through direct translation or through use of the Traducelo Ahora web-based Spanish language translation software that we make available free to any interested parent either in person or via our website. Translated materials include powerpoint presentations and workshop handouts for our SPAN Resource parent series (special education and special healthcare services, including Basic Rights; response to Intervention; IEP; Section 504; Discipline and Positive Behavior Supports; Transition to Adult Life, and Creating Agreement/Conflict Resolution); Medicaid managed care fact sheet series; Pre-IEP meeting letter and IEP meeting checklist as well as Questions for the Collaborative IEP Team guide; IEP preparation forms; parent mini-guides on a variety of topics; resources fact sheets; Accessing EI and Accessing Special Education fact sheets; Related Services, Extended School Year, response to intervention, Preschool Inclusion, and other fact sheets; Parent Rights under Federal Education Laws brochure and fact sheet on Choice and Supplemental Services under ESEA/NCLB; IDEA/NJ State Special Education Code Key Changes 2004 Parent Guide and IDEA/NJ State Special Education Code 2009 Amendments Parent Guide; among many others. SPAN also disseminates Spanish-language materials developed by other organizations such as Bright Futures Nutrition fact sheets; information on the rights of homeless students; information from NICHCY; etc.</p> <p>Rights of Immigrant Parents & Students (Language Access Rights, Bilingual Education Rights, Education Rights regardless of immigrant status, special education rights) Parent Guide & Powerpoint presentation: Spanish, Haitian-Creole, Arabic, Portuguese, Chinese, Korean, Gujarati</p> <p>Parent to Parent Support Manual: Spanish, Chinese, Haitian-Creole</p> <p>Health Insurance enrollment & eligibility information: Spanish, French/Haitian Creole, Portuguese, Chinese, and the Indian languages of Gujarati, Hindi & Tamil</p>		
<p>Are there set criteria for deciding: <i>Which materials will be translated?</i> <i>Who will translate the materials?</i> <i>How you will assess competency to translate?</i> <i>Who will provide a second check on the translation?</i> <i>Into which languages the materials will be translated?</i></p> <p>There are informal criteria that are used to decide the answers to each of these questions. Most of our materials are translated into Spanish as soon as possible, and usually the Spanish translation is done by our on-staff bilingual translator whose translations are tested by having them reviewed by our other Spanish-literate staff as well as by Spanish-speaking parent leaders with whom we work closely. Other materials are translated into other languages as required by specific grants or contracts. In these cases, we have used professional translation companies and then have had the materials reviewed by staff speaking those languages, community based organizations who have staff speaking those languages, or through focus groups with families speaking those languages. Other languages into which materials have been translated are noted in the question above.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No
<p>Are all translated materials pre-tested before made final? If No, which materials are not pre-tested and why?</p> <p>Our materials are pre-tested before made final, usually by SPAN staff and/or parent leaders fluent in the languages of the translated materials.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section III: LAP Evaluation

<p>Do you have and use a tool for collecting data on beneficiary satisfaction with interpreter services?</p> <p>SPAN calls back a sampling of families who received TA and/or participated in training and ensures that we include a sampling of families speaking languages other than English, primarily Spanish, to determine their level of satisfaction with SPAN's services. However, we do not specifically inquire as to their satisfaction with interpreter services. We also have a section on the home page of SPAN's website asking parents to tell us what they think of SPAN's supports and services; if users of the website use the web-based translation programs on the SPAN website, they can respond to the survey in multiple languages.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> To some extent	<input type="checkbox"/> No
<p>Have any grievance or complaints been filed because of language access problems? If Yes, with whom?</p> <p>No grievances or complaints have been filed because of language access problems. We have helped families file complaints because other agencies, districts, etc. have not provided adequate language access.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?</p> <p>The Executive Co-Director reviews the results of family call-backs regarding satisfaction with training and technical assistance, including the results of call-backs to families speaking languages other than English.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Are the data used as part of a review by senior management of the effectiveness of your organization's language assistance program implementation?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> To some extent	<input type="checkbox"/> No
<p>Do you regularly update your LAP and assess for modifications given changing demographics or changes or additions to your program?</p> <p>The Executive Co-Director who primarily develops the Language Access Plan reviews it at least annually and modifies it based on changing demographics and changes/additions to our program and incorporates its components into grant applications.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Do you obtain feedback from the community?</p> <p>SPAN obtains feedback from the LEP community in a variety of ways, including through our membership in and on the Board of the NJ Immigration Policy Network, our collaborations with organizations such as the Hispanic Directors Association and Family Success Centers, and through our work with parent leaders from immigrant communities, particularly Spanish-speaking immigrant communities.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Source:

The Interagency Working Group on LEP (www.lep.gov), c/o Coordination and Review Section – NYA Civil Rights Division, Department of Justice, 950 Pennsylvania Ave., NW, Washington, DC 20530