



# Language Access Plan

## **What is Language Access?**

Extension defines “language access” as the strategic and systematic management of multilingual communication within different contexts and across various types of delivery. There are two main goals for language access. First, language access involves providing appropriate accommodations (e.g., translation and interpretation) to alleviate communication barriers. Second, language access refers to extension’s collective effort to create programming, services, and activities that are culturally responsive and linguistically appropriate for persons with limited English proficiency (LEP). The purpose of creating language access is to ensure equal footing and equitable participation in programs and activities for LEP persons and audiences.

## **Who are persons with limited English proficiency (LEP)?**

Limited English Proficient (LEP) persons are those who do not speak English as their primary language and/or who have a limited ability to read, write, speak, or understand English. LEP persons may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). LEP persons are protected from national origin-based discrimination under Title VI of the Civil Rights Act of 1964.

## **What is the City of Ottawa’s obligation for serving LEP audiences?**

To comply with the corresponding legal framework for language access accountability as well as our commitment to serving all citizens, we commit to the following set of organizational standards:

- Provide free language support services for LEP audiences
- Provide public notice of language support services
- Maintain records of efforts to identify and serve LEP audiences
- Engage in language access training
- Monitor and evaluate language support services
- Expand programming access to underserved populations

## **Who is responsible for ensuring language access?**

Language access is the responsibility of all City of Ottawa staff members working within the scope of their position, duties, and responsibilities.

## **How is the City of Ottawa responsible for language access?**

The City of Ottawa will conduct a geographic area specific four-factor analysis once every four years and maintain a copy of the analysis in the civil rights files. The following four factors provide a flexible, fact-dependent standard for determining how the City of Ottawa should consider responding to their language access needs. The four-factor analysis includes the:

- Number or portion of LEP persons in Ottawa’s geographic service area
- Frequency of contact the City of Ottawa’s program, activity, and service have with LEP audiences
- Nature and importance of the program, activity, and service
- Organizational resources available to implement language access services



When the four-factor analysis reveals that there is a significant need for language access in the area, a language access plan should be developed.

### **Data Collection**

The United States Census Bureau's 2022 American Community Survey provides insight into the numbers of Ottawa residents who speak a language other than English at home and, among those, how many speak English "less than very well." This designation is used to help pinpoint individuals with limited English proficiency. In Ottawa, the number of LEP persons over the age of five and their languages of origin are identified as follows:

- 313 (Spanish)
- 24 (Other Indo-European languages)
- 49 (Asian and Pacific Islander languages)
- 33 (Other and unspecified languages)

### **What is the City of Ottawa's standard for language access?**

City of Ottawa has a legal obligation and moral commitment to provide accommodations for individuals with limited English proficiency.

The City of Ottawa will provide public notification about the free and rightful access LEP audiences have to translation and interpretation services as a part of our organizational activities. Public notification includes providing information in multiple languages as applicable.

The City of Ottawa is legally obligated to provide translation or interpretation services any time a member of the public requests service in connection to their—or someone else's—restricted ability to access or understand English-only information that is related to our organizational obligations.

In response to the needs of LEP persons, the City of Ottawa may provide interpretation assistance by qualified interpreters and translators including employees, volunteers, shared county resources, contracted vendors, or telephonic interpretation services. Persons providing interpretation services will either be native speakers and/or qualified interpreters. The City of Ottawa utilizes qualified bilingual staff, volunteers, or shared staff from other local agencies. Contracts with interpreters can also be established if internal or partner resources are not available.

### **Are there specific practices that do not meet language access standards?**

No persons under age 18 should serve as an interpreter or translator, including minor children of program participants. In some cases, a minor (under the age of 18) may assume the role of an interpreter to bridge initial communication between two adults. However, this should be strictly limited to circumstances related to spontaneous, informal encounters. Bilingual family members should only be consulted in emergency situations, and not relied upon regularly for services. Even if a participant offers to bring a family member or friend as an interpreter or translator, employees should (a) make the participant aware that certified interpreters and translators may be made available at no cost to the participant, and (b) inform the participant the family member or friend cannot be used if it becomes clear the family member or friend is not fully capable of the translation or interpretation.

Machine translation services such as Google Translate® or PowerPoint's® subtitle translation feature should not be relied upon for adequate language access. Using web-based translators to create materials in a



multilingual format creates unreliable, unethical, and inconsistent results. This is contrary to the notion of ensuring and expanding equitable access to programming and creates a disservice to the communities we are seeking to serve. While easy to use and a free resource, web-based translators are not a suitable alternative to sourcing professional translators.

**How can a language access complaint be filed?**

In accordance with the City of Ottawa’s policy and procedures, complaints may be filed with:

Michelle Stegman  
Human Resources Director  
City of Ottawa  
101 S. Hickory  
P.O. Box 60  
Ottawa, Kansas 66067  
[mstegman@ottawaks.gov](mailto:mstegman@ottawaks.gov)  
Phone: 785-229-3635  
Fax: 785-229-3636

Complaints pertaining to the City of Ottawa may also be filed with the Department of Homeland Security, Civil Rights and Civil Liberties. For specific questions or to file a discrimination complaint, please contact:

**DHS Office for Civil Rights and Civil Liberties**  
2707 Martin Luther King Jr Ave SE  
Washington, DC 20528-0525  
202-282-8000  
[crcl@hq.dhs.gov](mailto:crcl@hq.dhs.gov)  
<http://www.dhs.gov/crcl>