

08/01/2018



**Anchorage Fire Department
Language Access Representative**

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I. INTRODUCTION

This *Language Access Plan (LAP)* has been prepared to address the Municipality of Anchorage Fire Department's (AFD) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the Municipality of Anchorage.

Pursuant to Anchorage's Municipal Policy and Procedure #16-6, the Municipality of Anchorage must "provide timely and meaningful access to LEP and deaf or hard-of-hearing individuals in the conduct of municipal business." Part of meaningful access is up-to-date plans for each Municipal Agency to best support residents and visitors of this city, not only to meet Federal Civil Rights laws, but also to create a more welcoming municipal government and community for all people.

Anchorage Fire Department Description

AFD's mission is "to serve our community before, during and after an emergency". Every day – 24 hours a day – fire department personnel are on the job to serve the citizens and visitors of the Municipality of Anchorage. We stand ready to arrive on scene and mitigate any incident regardless of type – structure fires, wild fires, medical emergencies, water and swift water rescues, hazardous materials responses, vehicle extrication, or other public assists. Team AFD personnel are expertly trained and equipped and work steadfastly to ensure the best methods and technologies are incorporated into our operations.

Plan Summary

Anchorage Fire Department has developed this *Language Access Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency [LEP] who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, AFD used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by AFD.
2. The frequency with which LEP persons come in contact with AFD services.
3. The nature and importance of services provided by AFD to the LEP population.
4. The interpretation services available to AFD and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Municipality of Anchorage services.

The Mayor’s Office Language Access Liaison examined the U.S. Census Bureau’s 2009-2013 American Community Survey, Table B16001 “Language Spoken at Home by Ability to Speak English for the Population 5 years and Over.” Through an analysis of population sorted by census tracts within the Municipality of Anchorage, it was determined that approximately 6.2% of the Anchorage population (17,050 individuals) speak English “less than very well”. It should be noted that “less than very well” is inclusive of responses indicating they spoke English “not well,” and “not at all.”

Table 2
Populations Exceeding the LEP Safe Harbor Threshold
(5% of total population or 1,000 individuals – whichever is less)

Primary Language Spoken	# of Individuals	% of Population
Tagalog	3881	1.4
Spanish or Spanish Creole	3287	1.2
Hmong	1687	0.6
Korean	1539	0.6
*Other Pacific Island Languages	1379	0.5

* "Other Pacific Island Languages" includes, but is not limited to: Chamorro, Hawaiian, Ilocano, Indonesian, and Samoan

2. The frequency with which LEP persons come in contact with AFD’s services.

AFD’s Representative reviewed the frequency with which the AFD personnel have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits and found no historical data available.

3. The nature and importance of services provided by AFD to the LEP population.

Due to the great diversity of languages spoken in the Municipality of Anchorage, AFD recognizes that staff will come into contact with the LEP population. AFD staff are most likely to encounter LEP individuals through emergency response, dispatch phone conversations, and community meetings or gatherings.

4. The resources available to AFD, and overall costs to provide LEP assistance.

AFD reviewed its available resources that could be used for providing LEP assistance and which documents would be most valuable to be translated if the need should arise. AFD dispatch will use Language Line and Language Link for telephonic interpretation services. Currently, Language Line nor Language Link provide services in any Alaska Native Language; we are in coordination with the Municipality of Anchorage Mayors office to secure a contract. This is a work in progress and we do not have this capability yet. During weekday business hours, we will exclusively use the Language Interpreter Center for these needs. Fire and ambulance emergency response personnel call into Providence Alaska Medical Center and uses InDemand Interpreting language services. Cost will be determined and earmarked during the fiscal budget process.

III. LANGUAGE ACCESS PLAN OUTLINE

A. Identification of a LEP Person who needs language assistance services

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to AFD services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the AFD staff may identify an LEP person who needs language assistance:

- Signage about language services in different languages
- “Point to Your Language” Posters
- Self-identify as needing an interpreter
- Assessed and trained bilingual staff to assist
- Survey front line staff of any direct or indirect contact with LEP individuals.

B. Language Assistance Measures

Although the AFD has been using Language Line and the Language Interpreter Center since 2016, a recording and reporting mechanism will be implemented in July 2017. Invoices from both vendors assist in providing this information.

1. AFD staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - i. “Point Your Language” posters and brochures will be in easy view of front desk
 - ii. Language Link brochures with “Point Your Language” language identification and instructions for use will be given to all AFD employees and interns

- iii. Staff will be trained on how to identify language of LEP through use of “Point Your Language” cards or through assistance of Language Link operator
- iv. Staff will utilize Google Translates for quick assistance if a LEP person requires assistance with a document. Determination will be made for long documents if paid translation is to be pursued.

IV. STAFF TRAINING

The following training will be provided to all staff via online training and tracked in AFD’s training computer system:

- Information on the AFD’s responsibilities per/in regard to Title VI Policy and Language Access for LEP individuals
- Description of language assistance services offered to the public.
- Use of the “Point Your Language” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Working with an interpreter

AFD members are expected to follow the general procedures outlined in this standard operating procedure; however, exigent circumstances may require some deviations. Examples may include the need to obtain circumstances of the incident, or identifying information of an injured person. In such situations, personnel are to use the most reliable, temporary interpreter available. However, once an exigency has passed, all personnel are expected to revert to the general procedures in this plan.

Other than exigent circumstances, AFD members should avoid using family, friends or bystanders for interpretation. Using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or inadequate interpretation. Barring exigent circumstances, AFD members should not use minor children to provide interpreter services.

NOTE: Staff are prohibited from asking for citizenship status of any individual!

All contractors or subcontractors performing work for the Anchorage Fire Department will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

- AFD is currently reviewing our documents to determine which one(s) are vital.
- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Quotes for translation services will be received from both vendors before a contract is signed.

VI. MONITORING

Monitoring and Updating the LAP- AFD will update the LAP as required. At a minimum, the plan will be reviewed annually and updated with data points from following year and incorporate any new U.S. Census data as available. Updates will incorporate data gained from the reporting tool and staff observation, including:

- The number of documented LEP persons encountered in previous year
- Determination of the current LEP population in the service area
- How the needs of LEP persons have been addressed
- Determination as to whether the need for translation services has changed
- Determination of whether local language assistance programs have been effective and sufficient to meet the need
- Determination of whether AFD's financial resources are sufficient to fund language resources needed
- Determination of whether AFD fully complies with the goal of this Language Access Plan
- Determination of whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

VII. DISSEMINATION OF ANCHORAGE FIRE DEPARTMENT LANGUAGE ACCESS PLAN

- Post signs at District office notifying LEP persons of the LAP and how to access language services.
- The Notice of Rights under Title VI to the public is posted at all entrances in AFD facilities and at the front desks
- LAP will be posted on the AFD's webpage
- Copies of the LAP will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to:

Municipality of Anchorage Fire Department
Language Access Representative
Bill Tyra, Battalion Chief
Station 12, 1301 East 80th Ave, Anchorage, AK 99518
907-267-4993
tyrawr@muni.org

And:

Municipality of Anchorage Mayor's Office
Language Access Liaison
Amy Coffman
P.O. Box 196650 Anchorage, AK 99519-6650
907-343-7112 (phone)
coffmanaj@muni.org

Language Access Services Complaint Process:

- A complaint regarding the denial of language accessible services, or regarding the quality of language accessible services, including interpreters or translated materials, may be made in person, or in writing; or online at: https://moa_onlineforms.formstack.com/forms/language_access_complaint
 - Hard Copies will be available in Language Access Representatives office and will be translated into Spanish, Tagalog, Korean, Hmong, Samoan and Yup'ik.
- The complaint should specify the date, individuals involved, and the nature of the client (i.e. the interpreter was summarizing, or a LEP individual was denied services because they did not bring their own interpreter);
- All complaints will be directed to the department's Language Access Plan Representative, and the AFD's Access Liaison, who will timely respond and make recommendations for corrective action, if needed;
- All complaints will be directed to the AFD's Language Access Liaison, who will timely respond and make recommendations for corrective action, if needed;

VIII. DEFINITIONS

- A. Essential Public Information: Any information used by a department when dealing with the public which is necessary to accomplish the department's mission and with respect to public safety, public health, and economic development.
- B. Department Language Access Representative: The employee designated by the department director to be responsible for the department Language Access Plan (LAP) program.
- C. Four Factor Analysis: The procedure to determine the level of need for language services by documenting: 1) the number and proportion of LEP persons as reported by the most recent census; 2) the frequency with which LEP persons visit various MOA locations; 3) the nature and kind of programs or activities LEP persons use; and 4) the available resources and overall costs for LEP services.
- D. Frontline: Applies to departments and/or personnel that have regular and substantive contact with the public via in person or telephonic communication. See addendum for MOA organization chart with highlighted departments required to have written Language Access Plans.
- E. Interpretation: The immediate spoken communication of meaning from one language (the source language) to another (the target language).

- F. Interpreter: A person who is bilingual or multilingual and possesses the ability to successfully convey a message from one language to another through oral communication.
- G. Language Access Plan (LAP): Department specific documents outlining the procedures and practices that the department will implement to provide language access services to LEP individuals.
- H. Limited English Proficient (LEP): Someone who is not able to speak, read, write or understand English at a level that allows the person to interact effectively with department staff. Individuals maintain the right to self-identity as a LEP person and should not in any circumstances be expected to pay for translation or interpretation services in order to effectively communicate with the department.
- I. Mayor's Language Access Liaison: The employee designated by the Mayor to support the LEP program and to support the Department Language Access Representative.
- J. Telephonic Interpretation: A service that connects human interpreters via telephone to individuals who wish to speak to each other but do not share a common language. The telephone interpreter converts the spoken language from one language to another, enabling listeners and speakers to understand each other. Interpretation over the telephone most often takes place in a consecutive mode, which means that the interpreter waits until the speaker finishes an utterance before rendering the interpretation into the other language.
- K. Translation: The written communication of meaning from one language (the source language) to another (the target language).
- L. Translator: A person who is bilingual or multilingual and possesses the ability to translate from one language to another in written form.