

Language Access Plan

Municipality of Anchorage
Anchorage Water & Wastewater Utility

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I. INTRODUCTION

This *Language Access Plan* has been prepared to address the Anchorage Water & Wastewater Utility's (AWWU) responsibilities as a department within the Municipality of Anchorage, 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.

Department Description

The Anchorage Water & Wastewater Utility's mission is to provide safe and reliable water and wastewater services to the Anchorage community, today and into the future. AWWU is owned and operated by the Municipality of Anchorage for the core purpose of safeguarding the health and welfare of the public in our community, and the environment in which we live.

Quality drinking water is one aspect of the Utility operations. Along with the production of drinking water, AWWU collects and treats Anchorage's wastewater and safely returns it to the environment. Delivering water to Anchorage homes and businesses and protecting water resources by appropriately disposing of wastewater is the focus every day for nearly 300 professional employees that comprise the staff of the Utility.

The daily operations of the Utility are conducted within seven distinct divisions: Administrative Services, Customer Service, Finance, Engineering, Information Technology, Operations & Maintenance, and Treatment.

Plan Summary

The Anchorage Water & Wastewater Utility 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 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, the Anchorage Water & Wastewater Utility utilized, in part, the four-factor LEP analysis conducted by the Municipality of Anchorage Mayor's office, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the Municipality of Anchorage.
2. The frequency with which LEP persons come in contact with Municipality of Anchorage services.
 - a) In addition, AWWU specifically reviewed the frequency with which LEP persons come in contact with Anchorage Water & Wastewater Utility services.
3. The nature and importance of services provided by the Municipality of Anchorage to the LEP population.
4. The interpretation services available to the Municipality of Anchorage 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 Language Access Representative 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 Anchorage Water & Wastewater Utility services.**

AWWU's Language Access Representative reviewed the frequency with which office and/or field employees have, or could have, contact with LEP persons. This includes documenting phone inquiries or in-person office visits. May 2016-July 2018, the Anchorage Water & Wastewater Utility has

provided in-person interpreter for Spanish, 1 time and telephonically for Russian 1 time, Spanish 13 times, and ASL 1 time. Based on this information, the Anchorage Water & Wastewater Utility will have applications for service, rate information sheets, the “Welcome Brochure” and our most commonly used customer instructional templates translated into Spanish in 2019.

3. The nature and importance of services provided by the Anchorage Water & Wastewater Utility to the LEP population.

Due to the great diversity of languages spoken in the Municipality of Anchorage, the Anchorage Water & Wastewater Utility recognizes that staff will come into contact with the LEP population. AWWU employees are most likely to encounter LEP individuals through phone conversations, office visits, advisory board appearances, and community meetings or gatherings.

4. The resources available to the Anchorage Water & Wastewater Utility, and overall costs to provide LEP assistance.

The Anchorage Water & Wastewater Utility reviewed the 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. The Municipality of Anchorage has contracted with Language Link for telephonic interpretation services and the Alaska Institute for Justice-Language Interpreter Center for in-person interpretation and will seek quotes for necessary translation from both entities. The Anchorage Water & Wastewater Utility will utilize the most cost effective source for interpretation services, as outlined by the Municipality of Anchorage. Currently, Language Link does not provide services in any Alaska Native Language. Therefore, the Language Interpreter Center will be used exclusively for these needs.

III. LIMITED ENGLISH PROFICIENCY 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 AWWU 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. Encounters with LEP persons are expected to occur as stipulated in Part II (Section 3) of this plan.

How AWWU employees may identify an LEP person who needs language assistance:

- Signage about language services in different languages;
- “Point to Your Language” Guides and Posters;
- Self-identify as needing an interpreter;
- Assessed and trained bilingual staff to assist;
- Identification of household’s primary language and interpretation needs during the initial application and account set-up processes;
- Review customer information database for language interpretation needs during each customer interaction;
- At public meetings, set up a sign-in sheet table and have a staff member greet and briefly speak to each attendee. This method will allow staff to informally gauge the attendee’s ability to speak and understand English, while asking an open-ended question that requires a full sentence reply;
- Examine records requests for language assistance from past meetings and events to

- anticipate the possible need for assistance at upcoming meetings;
- Survey front line staff regarding any potential contact with LEP individuals.

B. Language Assistance Measures

Although AWWU has been using Language Link and the Language Interpreter Center since 2016, a more formal recording and reporting mechanism will be implemented in the 4th quarter of 2018. Invoices from both vendors assist in providing this information.

1. AWWU 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 to Your Language” posters and brochures will be in easy view at all front desk, public counters, and in field vehicles.
 - ii. Language Link brochures with “Point to Your Language” language identification and instructions for use will be given to all AWWU employees and interns.
 - iii. Staff received training on how to identify language of LEP through use of “Point to Your Language” cards and/or with assistance of a Language Link operator. On-going training and assessment will be offered throughout the year and implemented as part of the new hire onboarding process.
 - iv. Staff will utilize Google Translate for quick assistance if a LEP person requires assistance with a document or form. Determination will be made for long documents if paid translation should be pursued.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and responsibilities to provide services to LEP populations.
- Description of language assistance services offered to the public.
- Staff will be informed that asking for citizenship status of any individual is prohibited.
- Use of the “Point to Your Language” cards and posters.
- Working with and interpreter.
- Practical application training on the use of telephonic interpreter services and process for requesting in-person interpreter services. Including the use of Relay Alaska for TTY language services for the hearing impaired.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the Municipality of Anchorage and AWWU will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

- The Anchorage Water & Wastewater Utility will have its applications for service and most commonly used documents translated into Spanish in 2019.
- Google Translate will be utilized for quick assistance if a LEP person requires assistance

- with a document or from that has not been translated into the customer’s primary language.
- 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 services are engaged.

VI. MONITORING

Monitoring and Updating the LAP - the Anchorage Water & Wastewater Utility will update the LAP as required. At a minimum, the plan will be reviewed annually and updated with data points from the following year and incorporate any new U.S. Census data as available. Updates will incorporate data obtained from the reporting tool(s) 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 whether local language assistance programs have been effective and sufficient to meet the need.
- Determination whether AWWU’s financial resources are sufficient to fund the language resources needed.
- Determination whether AWWU fully complies with the goal of this Language Access Plan.
- Determination whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE ANCHORAGE WATER & WASTEWATER UTILITY’S LANGUAGE ACCESS PLAN

- Post signs at all public counters notifying LEP persons of the LAP Plan and how to access language services.
- The Notice of Rights under Title VI to the public is posted at all entrances, front desks, and public counters.
- LAP will be posted on AWWU’s webpage.
- Copies of the LAP Plan 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:

Anchorage Water & Wastewater Utility
 Language Access Representative
 Sarah Fry
 3000 Arctic Blvd. Anchorage, AK 99503
 (907) 564-2734 (phone)
Sarah.fry@awwu.biz (e-mail)

And

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

Language Access Services Complaint Process:

- Any LEP individual has the right to file a complaint where he or she believes that AWWU or the Municipality did not provide necessary LEP services as appropriate.
- The complaint process will be included in the posted notification of the right to an interpreter and posted on the Utility's public website;
- The Department will notify individuals of the complaint procedures and notification in languages most encountered;
- 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 the MOA website cited below;
- 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 documented, reviewed, and investigated by the Department's Language Access Representative, or designee. Every attempt will be made to resolve the issue at the Department level. The complainant will be notified in writing of the outcome of the Department's internal review and findings.
- If the Department is unsuccessful in reaching a satisfactory resolution, complaints will then be directed to the Mayor's Language Access Liaison, who will timely respond and make recommendations for corrective action, if needed.

The complaint form can be found online at:

https://moa_onlineforms.formstack.com/forms/language_access_complaint

Hard copies of the complaint form will be translated into Spanish, Tagalog, Korean, Hmong, Samoan and Yup'ik and will be available at the main public service counter(s) where a telephonic interpreter can be used to translate the document into other languages, as needed.

IX. 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 LAP 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.