



positiveENERGY

# Language Access Plan 2018

Chantelle Lewis  
Municipal Light & Power  
Language Access Representative  
[lewiscy@muni.org](mailto:lewiscy@muni.org)  
(907) 263-5302

# Table of Contents

I.	Introduction .....	Page 3
II.	Meaningful Access: Four Factor Analysis .....	Page 4
III.	Language Access Plan .....	Page 5
IV.	Staff Training .....	Page 6
V.	Translation of Documents .....	Page 7
VI.	Monitoring Language Access Plan .....	Page 7
VII.	Dissemination .....	Page 7
VIII.	Complaint Process .....	Page 7
IX.	Definitions .....	Page 8

## I. INTRODUCTION

This *Language Access Plan* has been prepared to address Municipal Light & Power's 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.

The Municipality of Anchorage, including Municipal Light & Power, is committed to equal opportunity and access to municipal services by the public. In order for equal opportunity to be established in one of the most diverse communities in the United States, as well as to comply with Federal Title VI, it is important that a Language Access Plan [LAP] be developed by each department of the Municipality, so that the services and resources they provide are accessible to everyone, regardless of their national origin.

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 is one of the most diverse communities in the United States. A 2012-2013 study showed that the Top 3 most diverse high schools in the nation are located in the Municipality of Anchorage, as well as 6 of the 7 most diverse middle schools, and the 19 most diverse elementary schools. Over 100 languages are spoken in the Anchorage School District, and Anchorage's Mountain View neighborhood is the most diverse neighborhood in the nation. In 1950 Anchorage was 97.2% "white"; by 2015 that number had dropped to 65.5%. The large shift in demographics in Anchorage has been, in part, due to an influx of foreign-born individuals who may be limited English proficient. Given the number of foreign-born persons living and doing business in Anchorage, and the essential public services provided by Municipal Light & Power, a Language Access Plan is a necessary tool to assist departmental staff and the public.

### **Plan Summary**

This *Language Access Plan* has been developed to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency [LEP] who wish to access services provided by Municipal Light & Power. As defined in Executive Order 13166, LEP persons are those

who do not speak English as their primary language and who 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 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 Municipal Light & Power.
2. The frequency with which LEP persons come in contact with Municipal Light & Power’s services.
3. The nature and importance of services provided by Municipal Light & Power to the LEP population.
4. The interpretation services available to Municipal Light & Power 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 by or are likely to require Municipal Light & Power’s services.

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.”

(\*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.”)

**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
Pacific Island Languages	1379	0.5

**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 Municipal Light & Power’s services.

Municipal Light & Power services some of the most diverse neighborhoods in Anchorage. Municipal Light & Power comes in contact with multiple LEP persons daily but has not collected data on LEP interactions. Municipal Light & Power will begin collecting data on LEP interaction in September of 2018. Municipal Light & Power recognizes a responsibility to the LEP community to be readily accessible and welcoming to the entire municipal population.

### **3. The nature and importance of services provided by Municipal Light & Power to the LEP population.**

Municipal Light & Power provides an essential service in the most diverse neighborhoods in the Municipality of Anchorage. Due to the great diversity of languages spoken in the Municipality of Anchorage, and the work of Municipal Light & Power, it remains likely staff will come into contact with LEP persons. Municipal Light & Power staff will encounter LEP individuals through office visits, phone contact and possibly in the field.

### **4. The resources available to Municipal Light & Power and overall costs to provide LEP assistance.**

Municipal Light & Power 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. Municipal Light & Power will use Language Link for telephonic interpretation services, the Alaska Institute for Justice-Language Interpreter Center for in-person interpretation, and will seek quotes for necessary translation from both entities. Currently, Language Link does not provide services in any Alaska Native Language, so Municipal Light & Power will exclusively use the Language Interpreter Center for these needs. Municipal Light & Power will use RNR Interpreting for ASL interpreting needs.

## **III. LANGUAGE ACCESS PLAN OUTLINE**

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

A Limited English Proficient person is defined as someone who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English. A Limited English Proficient person is entitled to language assistance with respect to Municipal Light & Power's 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 Municipal Light & Power's staff may identify an LEP person who needs language assistance:**

- Signage about language services in different languages
- "Point to Your Language" posters
- Self-identification as needing an interpreter
- Assessed and trained bilingual staff to assist

- Survey frontline staff about any direct or indirect contact with LEP individuals.

## **B. Language Assistance Measures**

A recording and reporting mechanism should be implemented to help track language access services that are being provided to LEP individuals. Invoices from both vendors assist in providing this information.

1. Municipal Light & Power’s staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in 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 of all front desks
  - ii. Language Link brochures with “Point to Your Language” language identification and instructions for use will be given to all Municipal Light & Power Customer Service employees
  - iii. Staff will be trained how to identify the languages of LEP individuals, through the use of “Point to Your Language” cards, or a Language Link operator
  - iv. Staff will utilize Google Translates for quick assistance if a LEP person requires assistance with a document. A determination will be made for long documents, whether or not paid translation is to be pursued. Staff fluent in the language identified by the customer will also assist in translating the customer’s requests, concerns and needs.

## **IV. STAFF TRAINING**

The following training will be provided to all Municipal Light & Power Customer Service staff:

- Information on the Municipality’s responsibilities regarding Title VI Policy and Language Access for LEP individuals
- Description of language assistance services offered to the public.
- Use of the “Point to Your Language” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Working with an interpreter
- Specific note that staff are prohibited from asking for citizenship status of any individual

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

## **V. TRANSLATION OF DOCUMENTS**

- Municipal Light & Power will determine what documents need to be translated on a case by case basis.
- Quotes for translation services will be received from both vendors before a contract is signed.

## **VI. MONITORING LANGUAGE ACCESS PLAN**

**Monitoring and Updating the Language Access Plan-** Municipal Light & Power will update the Language Access Plan as required. At a minimum, the plan will be reviewed annually and updated with data points from the next year, and will 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 whether local language assistance programs have been effective and sufficient to meet the need
- Determination whether Municipal Light & Power financial resources are sufficient to fund language resources needed
- Determination whether Municipal Light & Power 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 MUNICIPAL LIGHT & POWER'S ACCESS PLAN**

- Post signs in Municipal Light & Power's Customer Service lobby 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 Municipal Light & Power offices and at the front desks
- LAP will be posted on Municipal Light & Power's website
- 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.

## **VIII. LANGUAGE ACCESS SERVICES COMPLAINT PROCESS**

- Any LEP individual has the right to file a complaint where he or she believes that the Municipality did not provide necessary LEP services as appropriate.

- Frontline Departments shall take reasonable steps to inform LEP individuals and stakeholders about the complaint process. This shall include posting information about the complaint process and making it available in the most commonly spoken languages.
- A complaint may be made in person, in writing, or online. All complaints shall be directed to Municipal Light & Power Language Representative as well as the Mayor’s Language Access Liaison:

Municipal Light & Power’s  
 Language Access Representative  
 Chantelle Lewis  
 P.O. Box 196094 Anchorage, AK 99519-6094  
 907-263-5302 (phone)  
[lewiscy@muni.org](mailto:lewiscy@muni.org)

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](mailto:coffmanaj@muni.org)

- The complaint should specify the date, individuals involved, the nature of the complaint (i.e. the interpreter was summarizing, or a LEP individual was denied services because they did not bring their own interpreter), and the complainant’s contact information.
- The language access coordinator shall investigate whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance. The complainant will be informed in writing of the outcome of the investigation. If the coordinator makes a finding of noncompliance, the letter to the complainant shall include the steps that will be taken to correct the noncompliance.

The complaint form can be found online at:

[https://moa\\_onlineforms.formstack.com/forms/language\\_access\\_complaint](https://moa_onlineforms.formstack.com/forms/language_access_complaint)

Hard Copies will be available at the front desk and will be translated into Spanish, Tagalog, Korean, Hmong, Samoan and Yup’ik.

## **IX. DEFINITIONS**

- 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.