

# **Charleston County Government**



## **Limited English Proficiency Plan**

**March 2019**

## **Introduction**

The Charleston County Government *Limited English Proficiency (LEP) Plan* serves as a guide to address the communication needs of citizens with limited English language skills, in their use of County services and programs. Our goal is to make County services and programs and key information accessible to these individuals in order to best serve them and their families.

This LEP Plan has been designed using the Four Factor Analysis set forth by the U.S. Department of Transportation. The Four Factor Analysis is used to assist agencies in evaluating the priorities of their LEP program based on: (1) the number of LEP persons to be served; (2) the frequency with which LEP persons come into contact with a program or service; (3) the nature of the program, service or activity and its importance to the LEP community; and (4) the resources available to the agency and the overall costs.

## **LEP Census Data for Charleston County**

The number of residents who speak English less than “very well” is 23,783 or 6.7% of the population. The primary language other than English is Spanish in Charleston County. According to the 2016 American Community Survey 5-Year Estimates, 13,990 individuals speak Spanish as their primary language, 5,400 speak Indo-European languages, 3,143 speak Asian and Pacific Islander languages and 1,250 speak other languages.

## **Four Factor Analysis**

- (1) The number of LEP persons to be served – this Plan focuses on Spanish-speaking citizens, which makes up the majority of the non-English speaking population in Charleston County. That equates to approximately 14,000 LEP persons to be served.
- (2) The frequency with which LEP persons come into contact with a program or service – while Charleston County does not currently track data of LEP persons use of our programs and services, we have evaluated this factor by identifying the departments that have the heaviest contact with the public and by surveying departments to determine where the greatest need is for translation and interpretative services.
- (3) The nature of the program and its importance to the LEP community – this factor will be used to prioritize different aspects of the LEP Plan during implementation.
- (4) The resources available to the agency and overall costs – the County will use volunteer interpreters and professional trainers for interpretation services to minimize costs. We will also enter into a County-Wide vendor contract for telephonic interpretation services and translation services. We will use a state contract to get the best possible pricing and for ease of implementation. We will request a modest budget of \$5,000 to start with. Human Resources will be the steward of this budget.

## **Tracking Data**

The County will begin tracking each incident of utilization of an interpreter. We will select a telephonic interpreter and document translation vendor that can provide usage reports by department for the use of telephonic interpretation services. In addition, we will keep a log of written materials to be translated and document the dates that the translated materials were published by the County and the cost of translating each document.

## **Efforts to Assess the Need for Translation and Interpretive Services**

Departments with heavy public contact, and forms and information for the public, have been identified. For interpretive services, we have prioritized the departments that are in the greatest need interpreters: The Assessor's Office, The Treasurer's Office, Building Inspection Services, The Auditor's Office, Voter Registration, Veteran's Affairs, and the Sheriff's Office.

For the purposes of this proposal, the Courts and Judicial Departments, which include The Clerk of Court, Magistrates/Summary Courts, The Solicitor's Office, Probate Court, Master-in-Equity and the Public Defender's Office, are not included in this program because legal interpretation and translation services are provided by the South Carolina Court Administration.

For in-person interpreters, there will be an individual approach for Emergency Medical Services and the Sheriff's Office since first responders, due to the nature of the work, are in a unique environment that may require separate and distinct considerations, as well as consultation with subject matter experts. One improvement that could be implemented immediately, with support from the Sheriff and County Administrator, is adding the bi-lingual preferred qualification to job postings and making a commitment to use this qualification as a factor in candidate selection. In addition, a recruitment strategy that attracts more bi-lingual candidates to law enforcement and EMS could be implemented.

In implementing our plan, we should keep in mind that, in the professional field of interpreters, legal interpreters and medical interpreters are regarded as subject matter experts in the field they are working in. As such, in our program the medical and legal departments should be handled with special attention and in consultation with subject matter experts.

The County will identify the call centers and service centers in need of a Language Services Line, in an effort to work with Procurement to expand the vendor contract. Currently three departments are using a Language Services Line: the Consolidated Dispatch Center (911), the Charleston Center (Department of Alcohol and Other Drug Abuse Services) and the Summary Courts.

The County has identified eight departments having a "General" email inbox, receiving emails from the general public. The employees responsible for maintaining these inboxes will be trained on using free translation software to assist them and will be required to track contact with LEP individuals.

The County is in the process of assessing the need for translation of forms, brochures and other written materials. We have taken an inventory of forms and written materials intended for the public in each department. Next, we will contact each department head and request that they prioritize their forms and written materials for translation.

## **Contracting Services**

There are several vendors on contract with the State of South Carolina which offer telephonic interpretation services and translation services. The County will contract with a state-approved vendor to make telephonic interpretation services and translation of documents available to all departments. The services will be coordinated by Human Resources. We plan to allocate \$5,000 for this contract for FY20. Once the contract is finalized, we will notify all departments with instructions on how to use the interpretation services. The translation of documents will be coordinated through Human Resources.

The Departments that currently have individual contracts with vendors should keep theirs intact as they have a larger demand for these services and, therefore, should work directly with the vendor of their choice.

### **County Website**

Most of the content on the Charleston County webpages is translated using Google Translate. This enhancement was implemented in December 2018. We have identified a small number of remaining department websites that are on a separate web configuration and, therefore, are still without translation. We are in the process of contacting these departments to request that they add Google Translate to their webpages.

### **Charleston County Public Libraries (CCPL)**

Charleston County will recommend that CCPL enter into their own contract for telephonic interpretation and translation of written documents. We will provide CCPL with a copy of our vendor contract as a sample for their administration, to help them get started with the process.

### **Steps Charleston County Government is Planning to take by July 1<sup>st</sup>:**

- Secure a budget of \$5,000 to start the LEP Program. The initial \$5,000 will be used for the vendor contract.
- Select a vendor and enter into contract for services.
- Create a plan for prioritizing translation of written materials, working in consultation with departments.
- Meet with County Recruiters to coordinate updating of job postings in the Sheriff's Office and EMS to include bi-lingual Spanish speaking as a preferred qualification.

### **Monitoring and Evaluation of the Plan**

A Program Administrator will be assigned to monitor the progress of the plan and maintain the plan components. An assessment of the program will be completed after one year. The assessment will look at the following:

- The quality of services provided by the vendor
- The percentage of forms and written materials translated, from the initial materials identified as a priority
- Usage data collected from vendor
- Recruitment data for bi-lingual candidates (how many applied, were interviewed, hired)