Language Access Plan

OKLAHOMA COOPERATIVE EXTENSION SERVICE

FOREWORD

Persons with limited English proficiency (LEP) are protected from national origin-based discrimination under Title VI of the Civil Rights Act of 1964. As recipients of federal financial support, the Oklahoma Cooperative Extension Service's programs, services, and activities are accountable to the federal laws and policies that protect the rights of LEP persons. The following language access plan (LAP) is our organization's guiding document for serving LEP audiences in our activities. It builds on the previous findings by working groups, guidance documents, reports, and other sources of information that focused on identifying and addressing Cooperative Extension's language access needs.

Strong communication is essential to build the strong relationships that support our work and mission. This LAP is an expression of our ongoing commitment to serve the linguistically and culturally diverse communities in Oklahoma. Its purpose is twofold. First, it articulates Cooperative Extension's responsibilities for meeting federal language access obligations in our programs and activities. Second, it guides our practices and efforts in ways that systematically address language barriers within the organization. In essence, the LAP converges our commitment to expanding access and our commitment to ensuring equity in programming.

The LAP clarifies our organizational responsibilities to provide appropriate language accommodations through our federally funded programs, activities, and services. It was written in accordance with the legal framework outlined by federal law, policy directives, LEP guidance documents from the National Institute for Food and Agriculture (NIFA), and other sources and authorities of federal funding and oversight.

When examined through the lens of our work in educational programming, language access assumes additional meaning. Our organizational response to shifts in demographics and the emerging needs within our state's communities is important, which is why serving LEP audiences in ways that are both culturally responsive and linguistically appropriate is a critical priority. Translation, interpretation, and other language support services are some of the ways Cooperative Extension staff helps create linguistically inclusive learning environments. These services expand the reach of educational programming and enhance the public impact of our work by reducing barriers that interfere with the flow of information and communication. Language access is an equity-minded approach to educational programming that adds value to the impact of our work.

Ensuring language access is an organizational effort. Understanding federal policy and minimum legal standards to serve the needs of LEP populations help us set a baseline for goals and priorities. This plan charts our strategic vision for how we promote language-based inclusion by outlining the procedures, processes, and practices that help us enhance our capacity to serve. Thank you to the LAP advisory committee whose feedback, insight, and experience helped shape the contents of this document. The LAP will be subject to periodic review every two years and ongoing updates to help our organization improve the way we serve LEP audiences.

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SECTION 1

Cooperative Extension's mission, values, and language access policy

1.1 Mission statement

Oklahoma Cooperative Extension Service helps the people of Oklahoma apply university research, knowledge, and resources to meet their educational needs wherever they live and work.

1.2 Organizational values

COMMUNICATION: Practice active listening skills. Effective use of written, oral and electronic communication. Respond promptly and diplomatically to inquiry. Use of a variety of methods to positively promote the Cooperative Extension Service. Communicate effectively with diverse audiences, other professionals and co-workers.

FLEXIBILITY: Demonstrate openness to new ideas. Adapt well to changing priorities, situations and demands. Demonstrate ability to compromise. Adapt to time and role requirements.

INITIATIVE: Demonstrate motivation, commitment and dedication. Follow through with projects in a timely manner. Work to maintain an area(s) of expertise. Take calculated and educated risks to strengthen programming. Use sound judgment. Use innovative programming to address changing needs of clientele.

ORGANIZATION: Demonstrate effective management of time, resources and people. Be prompt, timely and dependable. Successfully multiple projects.

PROFESSIONAL ORIENTATION: Exhibit honest and ethical behavior. Present appropriate and professional appearance. Possess and display a positive self image. Accept and follow OCES policies and procedures. Exhibit professional courtesy.

PROGRAM PLANNING, IMPLEMENTATION, AND EVALUATION: Develop and actively implement a substantial and innovative Annual Timeline. Present programming in a professional manner. Encourage participant involvement. Build rapport with program participants. Deliver information in an effective manner. Work effectively with program advisory committees. Conduct program evaluation. Submit required reports in a timely manner.

SERVICE ORIENTATION: Identify and develop programs to meet critical needs. Demonstrate effective development and delivery of educational programming for diverse audiences.

TEAMWORK/LEADERSHIP: Use proactive approach to problem solving. Encourage creative thinking in decision making. Take responsible risks and make timely decisions. Utilize volunteer leadership. Effectively structure committees to develop and implement programs. Work cooperatively with and be supportive of co-workers. Work toward group achievement. Build and maintain positive relationships and work effectively with clientele and other professionals.

TECHNOLOGY: Demonstrate competency and effective use of computers and electronic communications technology, including social media. Use technology effectively and appropriately.

1.3 Why language access matters to our work in Cooperative Extension

Strong communication is essential to build strong relationships with our Oklahoma communities. In some cases, however, language differences between our organization's staff and members of our state's communities present challenges to the communication process. In many cases, these challenges can be avoided with the appropriate types of support. We do not want to limit our organization's capacity to build strong relationships across the state. We value opportunities to build relationships around the state and do not want to limit our organization's capacity to fulfill its mission. Our organization is committed to inclusive practices in programs and activities that help build stronger relationships with linguistically and culturally diverse audiences. In order to realize this commitment, we need to ensure that persons who may be limited in their ability to communicate effectively in English, and staff who may be limited in their ability to speak languages other than English have the appropriate support to communicate with one another as needed.

1.4 Language access policy

In accordance with our organizational values and the federal accountability framework for language access, it is Cooperative Extension's policy to ensure that persons with limited English proficiency have meaningful access to our programs, services, and activities. Our objective with this policy is to ensure that no person is subject to prohibited discrimination based on their language, or any other identity marker associated with one's national origin.

SECTION 2

Cooperative Extension's language access plan

2.1 Definition of language access

Cooperative Extension defines language access as the strategic and systematic management of multilingual communication within different contexts and across various scales of delivery. With regard to Cooperative Extension activities, language access has two main implications. First, language access involves the provision of appropriate accommodations (e.g., translation and interpretation) to mitigate communication barriers caused by language differences. Second, language access refers to Cooperative 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.

2.2 What is limited English proficiency (LEP)?

Limited English proficiency refers to persons who do not speak English as their primary language and/or who have a limited ability to read, write, speak, or understand the English language.

2.3 Key terms

Effective communication involves the removal of language barriers to provide LEP persons with the same substantive level of access to information and services that are available to persons who are not LEP.

Federally assisted refers to programs, activities, and services in Cooperative Extension that receive financial and other types of support from federal sources.

Interpretation is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. The different modes of interpretation follow:

- **Simultaneous interpretation** is a mode of interpretation commonly used in large-scale meetings, conferences, trainings, and presentations. The simultaneous interpreter listens to the speaker and simultaneously interprets the message from the source language to the target language. One-way microphone systems are often used for settings that need simultaneous interpretation.

- **Consecutive interpretation** is a mode of interpretation that is commonly used in small-scale meetings. The consecutive interpreter waits for the speaker to finish a sentence or an idea, and then renders the speaker's words into the target language.

- **Remote/distance interpretation** is a mode of interpretation that uses technology, usually phone or tablet, to remove communication barriers. The use of technology does not require the interpreter to be in the same location as the two speakers needing language support.

- **Sight translation** is the oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

Language support services are oral and written language accommodations that help LEP individuals and non-LEP individuals communicate effectively. Interpretation and translation are commonly referred to as language support services in this document.

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).

Meaningful access (for LEP audiences) denotes access to Cooperative Extension programs, activities, and services that are not significantly restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.

Reasonable steps refers to the affirmative and appropriate measures and resources used by Cooperative Extension to mitigate access barriers to information and participation in educational programs. The federal government uses a four-factor analysis as a baseline to determine compliance with providing LEP persons meaningful access to an organization's activities. The four-factor analysis is explained in Cooperative Extension's language access plan.

Translation is the process and product of rendering written text from one language (source language) into another language (target language).

2.4 Purpose of the language access plan

In order to uphold the organization-wide commitment expressed through its language access policy, Cooperative Extension has created this language access plan. The purpose of the following language access plan is to provide a comprehensive and shared understanding of how Cooperative Extension, as a part of the U.S. land grant system, operationalizes its organizational responsibilities and commitment to serving the linguistically diverse individuals and communities of Oklahoma. This plan outlines the policies and procedures that guide the reasonable steps the institution and its employees must take in order to create "meaningful access" for persons with limited English proficiency (LEP), a federally protected audience under Title VI of the Civil Rights Act of 1964 (§ 601).

2.5 Document scope

This language access plan applies to all programs, activities, and services carried out by, or in coordination with, Cooperative Extension.

SECTION 3

Language access accountability

3.1 Language access is a matter of civil rights

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in federally supported activities (§ 601). According to the law, a person's language is considered to be an extension of one's national origin. Under Title VI, individuals and communities are protected from being the targets of discrimination, which includes organizational practices in federally supported activities that have a disparate impact on groups that speak different languages, see Lau v. Nichols, 414 U.S. 563 (1974).

Since Cooperative Extension programs, services, and activities receive financial and other types of support from federal sources, language access compliance responsibilities established by Title VI and the corresponding legal framework apply to the entire organization and staff acting on its behalf.

3.2 Guiding legal framework for language access accountability

The following core set of laws, policies, and regulations formulate the legal standards for Cooperative Extension's language access accountability and nondiscrimination compliance:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 (2000)
- Memoranda to Federal Department Heads from Attorney General (2010, 2011)
- Food and Drug Act (2008)
- The Department of Agriculture's (USDA) Final Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency (2014)
- The National Institute of Food and Agriculture's (NIFA) Limited English Proficiency (LEP) Implementing Strategy for Federally Assisted Programs (2016)

3.3 The federal standard for serving LEP audiences

Reasonable steps

The legal framework for language access accountability establishes that recipients of federal support must provide "reasonable steps" to ensure that LEP populations have meaningful access to programs, activities, and services. Federal authorities use a four-factor analysis to evaluate organizational standards for ensuring language access obligations.

Four-factor analysis

The following four factors provide a flexible, fact-dependent standard for determining how institutions should consider responding to their language access needs. The four-factor analysis includes the:

- Number or portion of LEP persons in target or eligible population;
- Frequency of contact the organization's programs have with LEP audiences;
- Nature and importance of the program or activity;
- Organizational resources available to implement language access services.

3.4 Cooperative Extension's legal obligations to ensure nondiscrimination for LEP persons

Denying a request for language support services

Our organization has a legal obligation to provide accommodations for individuals with limited English proficiency. Therefore, to the extent covered by law, we are to fulfill request for language support services to a person who is a participant, or wants to participate in Cooperative Extension programs, services, and activities.

Requests made by members of the public

Cooperative Extension is legally obligated to provide translation or interpretation services any time a member of the public requests services in connection to their—or someone else's—restricted ability to access or understand English-only information that is related to our educational programming activities.

Programming that requires critical or vital communication

Critical or vital communication means information in any format that clientele/participants need to access programming. Any English-only document used by Cooperative Extension in an official capacity is subject to translation. This is particularly true for applicant participation, release or consent forms, documents related to a participant's medical history, emergency information, and other documents that ask for information that is sensitive in nature.

Cooperative Extension abides by the "Safe Harbor" provision for translation of vital written materials. The provision outlines the circumstances that can provide a "Safe Harbor" for compliance with LEP requirements (meaning no translation is required) which is considered strong evidence of compliance with written translation obligations. (see Safe Harbor resource)

General educational programming

Cooperative Extension may be legally obligated per Title VI to provide language support services in educational programming based on, among other things, 1) the nature and scope of the project, 2) the target audience, and 3) community demographics within the designated service area. If you have questions or are unsure about any potential language access obligations of your project or programming, please contact the appropriate district director.

SECTION 4

Language access and Cooperative Extension

4.1 Standards for serving LEP audiences through Cooperative Extension activities

In order to comply with Title VI nondiscrimination law and the corresponding legal framework for language access accountability, Cooperative Extension commits itself to the following set of organizational standards. Ongoing guidance provided in this LAP and other resources will help Cooperative Extension and its employees and volunteers maintain the following organizational standards:

Free language support services for LEP audiences

Cooperative Extension will provide language support services such as translation and interpretation at no cost to the intended beneficiary of such services.

Public notification of language support services

Cooperative Extension 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. Stating in outreach documents that language services are available from the recipient. Announcements could be in brochures, booklets, and outreach and recruitment information. Including notices in local newspapers in languages other than English, as well as established community papers published in languages other than English. Providing notices on non-/English language radio and television stations about the available language assistance services and how to obtain them. Providing presentations and/or notices at schools and religious organizations. Working with community-based organizations and other stakeholders to inform LEP individuals of the recipients' services, including the availability of language assistance services.

Maintain records of efforts to identify and serve LEP audiences

Our organization will keep records on the way we identify LEP audiences and provides services to them through Cooperative Extension activities. Record keeping related to language access needs across the organization may include, but is not limited to:

• Communications from the district director, OCES Associate Vice-President's office, DASNR Human Resources or OSU Office of Equal Opportunity pertaining to language access resources and tools.

• Programming and projects provided in a multilingual format.

• Tracking language support services used (language support requests, archives of translated materials, events that used interpreters, service delivery evaluations, etc.).

• County-based language needs assessment tool (see DASNR HR Employee Portal).

• Data that supports a collective understanding of linguistic and cultural diversity in given service area or sector (e.g., U.S. Census Bureau, Department of Agriculture or other reliable sources).

• Empirical data on LEP persons within a given service area (American Community Survey/U.S. Census Bureau).

• Evidence of partnerships with community agencies that serve LEP persons and/or communities.

Training
Cooperative Extension's District Directors in conjunction with the DASNR Human Resource office, will provide leadership for training and resources that help the organization meet its language access needs and goals.

Monitor and evaluate language support services

As the primary guidance document for the organization, this LAP provides tools and guidance for ongoing assessment of efforts to serve LEP populations. The LAP will be reviewed and updated every two years or otherwise as determined appropriate by organizational stakeholders. The OCES Associate VP, district directors and DASNR Human Resources will provide ongoing administrative oversight for monitoring and evaluating the reach and impact of language access efforts.

Expand programming access to underserved populations

Cooperative Extension categorizes LEP persons as an underserved population. In addition to federal nondiscrimination laws, expanding program access to serve LEP audiences is an integral part of Cooperative Extension's mission and one of its core organizational priorities. Anticipating and responding to language access needs for programming and projects helps promote linguistically inclusive learning environments. While interpretation and translation services are often used in the process, expanding access to LEP audiences also involves exploring new approaches to developing and delivering educational programming in a multilingual learning and living environment.

4.2 How to budget funds for language access needs
Interpretation services

An interpreter may charge anywhere from $30.00 to $80.00 per hour depending on individual qualifications, the language pair, and the nature of the event. Please note that many interpreters and agencies may also charge for travel time, mileage, and the use of interpretation equipment. In addition, agencies also may charge higher rates for evening or weekend hours and for interpreting in less frequently spoken languages. It is not unusual for some agencies to have policies that require a minimum of two interpreters for assignments that

exceed a certain amount of time. It is important to discuss the rates and policies of interpreters and agencies prior to booking them for an event. The district director or DASNR Human Resources is available to help identify measures of quality when contracting with interpreters for events.

Translating documents

Not all translators and agencies charge the same nor do they produce the same quality product. Therefore, the fastest turnaround time and cheapest rate for translating documents is not a reliable way to ensure that you are working with a quality translator. Depending on a host of different factors, a translator may charge anywhere from $0.12 to $0.22 per word. It is important to discuss how a translator charges for services and the means they use to ensure quality prior to hiring them. The district director or DASNR Human Resources is available to help identify measures of quality when hiring translators for projects.

4.3 How to address language-based/national origin discrimination complaints (per Title VI)

Overview

As mentioned above, OCES is committed to nondiscrimination and takes complaints related to civil rights, Affirmative Action, Equal Employment Opportunity, and sexual harassment very seriously. A complaint or charge of discrimination or harassment can be registered by any person (employee, program or activity participant, job applicant, visitor, volunteer, etc.) who has reason to believe that they have been subjected to or witnessed unlawful discrimination, harassment, or retaliation in an Extension education program or activity, or in the employment setting.

Discrimination complaint form

The OSU Office of Equal Opportunity form for filing a discrimination complaint is available at: **https://hr.okstate.edu/equal-opportunity/reporting.html**

Who can file a discrimination complaint?

Any person has the right to file a complaint.

Filing a complaint

The OSU Office of Equal Opportunity process following filing a complaint is available at: **https://hr.okstate.edu/equal-opportunity/**

For specific questions related to discrimination complaints, please contact:

Claude Bess, District Director Southeast District	OSU Office of Equal Opportunity Oklahoma State University 401 General Academic Bldg Stillwater, OK 74075 eeo@okstate.edu 405-744-7420	DASNR Human Resources LaTricia Snider, Director 235 Ag Hall Stillwater, OK 74078 405-744-5523 latricia.snider@okstate.edu
Nancy Johnson, District Director Northeast District		
Cindy Conner, District Director West District		

4.4 Cooperative Extension contacts for language access

Please direct any questions related to Cooperative Extension standards for compliance, language support services, or other language access issues to:

Claude Bess, District Director Southeast District	DASNR Human Resources LaTricia Snider, Director 235 AG Hall Stillwater, OK 74075 dasnr-hr@okstate.edu 405-744-5523
Nancy Johnson, District Director Northeast District	
Cindy Conner, District Director West District	

For colleagues

SECTION 5

Language access support for Cooperative Extension activities

5.1 Statement of organizational support

Cooperative Extension is committed to providing support for language access needs across the institution's programs, services, and activities.

5.2 Reasons to need language support services

Requests for translation, interpretation, and other forms of language support services are essential to our organization's work for four main reasons:

- To enable LEP members of the public the rightful opportunity to participate in Cooperative Extension programs, activities, and services;

- To communicate public information about Cooperative Extension activities in a multilingual format;

- To aid Cooperative Extension staff in comminucating with with LEP persons; and

- To assist with the coordination of emergency-response situations.

5.3 Emergency situations

Natural disasters or any other type of emergency situation may pose immediate risks to the health, life, environment, or property of Oklahoma residents. During emergencies, immediate dissemination of critical information to the public, safety response, or damage assessment may need to be communicated and coordinated within Cooperative Extension's service areas.

For immediate assistance with multilingual communication during emergency situations, please contact the appropriate district director.

5.4 Available language support services

Translation project management

Translation helps make text-based materials available in more than one language. Support is available to help coordinate and manage a broad range of factors involved in the translation process. Support with translation project management may include: ascertaining translation needs per the target audience, finding the appropriate professional translation service vendors, obtaining cost quotes based on industry practices, and maintaining standards of professional quality.

Interpretation services

Interpretation is a type of language accommodation that helps mitigate communication barriers caused by language differences spoken between one or more parties. Interpretation services are used to facilitate communication during Cooperative Extension programs, services, trainings, and other organizational activities. Support for providing interpretation services may include: ascertaining language needs per the target audience, sourcing appropriate professional interpreter service vendors, obtaining cost quotes based on market rates, and assuring that services are carried out in a professional and ethical manner. Support with the coordination of interpreter services helps provide equitable, meaningful access for LEP persons participating in our programs, activities, and services.

Programming and project consultation

General consultation on language access needs for planning programs and projects is also an available support. The Language Access Team helps Cooperative Extension colleagues identify and formulate a plan for the language access needs of their program or project, discuss potential barriers, develop a more nuanced understanding of their targeted LEP audience, and consider other sociolinguistic factors that may be relevant given the context. Project consultation concerning language access needs helps Cooperative Extension staff generate and implement strategies that add significant value to their educational programming. The goal of language access is to promote greater inclusion of populations under-served by the Cooperative Extension mission, and to do so in a way that is both culturally responsive to their needs and linguistically appropriate for the situation.

Training

Staff members responsible for contact with the general public will be knowledgeable about our Language Access Plan and how to provide services to persons that are limited English proficient in the languages identified through the assessment. All employees will receive an on-boarding training and refresher information at least every two years. Cooperative Extension is currently in the process of collecting data to assess and develop training around language access. If you have questions related to training issues and needs, please contact the appropriate district director or DASNR Human Resources.

Simultaneous interpretation equipment loan/rental program

Cooperative Extension has two sets of one-way microphones, each with 24 receivers, to use during programs, activities, and services that need simultaneous interpretation.

We also have access to work with ABLE Tech who may have applicable equipment for rent.

5.5 Requesting support

How to request support

The three main ways Cooperative Extension staff can find support for educational programming include:

•   Visit the DASNR Human Resources Employee Portal site for LEP information and resources on serving LEP populations.
•   To initiate any request, the request must first be submitted to the local County Extension Director and/or the appropriate District Director.

•   Contact the appropriate District Director

•   Contact DASNR Human Resources at dasnr-hr@okstate.edu

•   Contact the OSU Office of Equal Opportunity at eeo@okstate.edu

Eligibility for requesting and receiving organizational support

•   **Who can request and receive support?**
Cooperative Extension staff members working within the scope of their position duties and responsibilities are eligible to request and receive support for language access needs. This includes Extension county office support staff.

5.6 Is there a cost for requesting support?

Is there a cost for language access support with programming and projects?

If you receive support for your language access project, there may be a cost for services (translation, interpretation, consultation, training, equipment rental). Cost implications are discussed between the district director with the requester prior to authorizing any work on a project and determined based on the nature of each project.

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SECTION 6

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Language Access Team

The Language Access Team aids in assisting with locating options for translation and interpretation for programming carried out by Cooperative Extension. The following section helps Cooperative Extension colleagues understand their role in managing projects when receiving support from Cooperative Extension's Language Access Team.

6.1 Before you request support for a project or event

Identifying your target audience

Efforts to meaningfully include and serve LEP members of any community, regardless of their language, starts at the beginning of your planning process. To this end, working to develop a nuanced understanding of the dynamics and attributes of your target group is critical. Learning about your target group and being able to assess or at least anticipate their language needs is key to determine when a language accommodation is appropriate, necessary, and/or legally required. Tools for assessing language access needs in county-based service areas are discussed below.

Project or event planning timeline

The planning of your project or event takes a considerable amount of time; the same is also true for the process of planning to accommodate your language access needs. Requests for translation and interpretation should not be a final step in the planning process. Every event and project is unique, and depending on
the nature of the program or project, its location, and target audience, language access needs can vary significantly. Please consider your language access needs during the beginning of your planning process and request support accordingly.

Baseline information related to your project or program

The information you provide to the CED and/or the DD helps to gain an initial understanding of your project or event. In order to ensure that all of your language access needs can be considered and accommodated accordingly, certain details are relevant and helpful to have on hand as we engage you in the process.

Translation services

- **Vital details related to your project**
  Please have the following information available when you make your request for translation support (as applicable):
  – Details related to the project (overview of project, brief description of components, project size or number of pages, intended audience, etc.).
  – The name(s) of any funding source(s) that will be used to support the project or event.

- The name(s) of the project's point person if not the same as the person making the request.
- Additional persons or organizations that are collaborating on the project or event.

Interpretation services

Prior to requesting support with interpretation services for educational programming, please have the following information to the extent that it is available:

- Date(s), times, location(s) of the event.
- Official event name and brief description of the setting where it will take place.
- Language pairs needed (English to Spanish, English to Hmong, etc.).
- The designated contact person for the event (in most cases the requester serves as the point person for coordinating the services provided during the event).
- Estimated size of the audience.
- Any additional information related to the target audience (e.g., parents of middle school children, area farm operators, etc.).
- Additional persons or organizations collaborating on the event.

Language Access Team's role

Language access team comprised of the applicable county extension director, district directors, DASNR human resources, member of Ag Communications and the Digital Team. The team will work with the requester in ways that help them understand how to identify and meet their language access needs, and help broker the relationship with professional service vendors when necessary. Working with the language access team helps assure high quality services that are time, cost, and energy efficient as possible. Items to consider when working on a project or event:

- Identifying necessary language accommodations for creating meaningful access, prioritizing language access needs.
- Identifying dynamic factors that influence the target LEP population's language needs (e.g., dialects, regional varieties, etc.),
- Considering the sociocultural attributes that may be relevant to the target population.
- Understanding the marketplace for translation and interpretation service vendors.
- Sourcing professional translators and interpreters within the marketplace.
- Obtaining accurate cost estimates for the project.
- Developing a timeline for language access planning.
- Evaluating the quality of translation, interpretation services.
- Coordinating invoicing and payments.

During the process of the CED and DD supporting staff with their project or event, discussion around culturally relevant strategies for programming, outreach, engagement, and assessment become a natural part of the collaboration. This type of support helps strengthen our relationships across communities.

Cost and funding considerations for language access projects

• Projects requiring additional approval
Project or events can vary in size and scope, which may warrant additional considerations for administrative decisions and funding. The district director will work with state office administration when additional approval is needed and provide guidance as appropriate.

• Cost sharing
However, depending on the nature of the project, program areas may be partially or wholly responsible for sharing the costs of providing translation and interpretation services. The district director will determine funding implications and cost sharing responsibility for projects. For circumstances related to the nature of organizational responsibilities and legal accountability for ensuring language access, please refer to Sections 2 and 3. The district director will provide guidance on whether or not cost sharing is necessary for Cooperative Extension programs, services, and activities that need language support services.

• Project funding
The cost associated with meeting our language access needs should not create an unnecessary barrier to fulfilling our legal responsibilities and providing meaningful access to LEP persons. However, if the cost puts an undue hardship on the program and fundamentally alters the program, district directors in conjunction with DASNR HR and OSU OEO must first review and approve any denial.

SECTION 8

Standards of practice for county offices

8.1 Identifying language access needs in your service area

County office language access needs assessment tool

The language access needs assessment tool was developed as a way to understand the languages spoken in different counties and other Cooperative Extension service areas. It provides an initial way to inform staff about current needs and identify potential opportunities to improve engagement with linguistically diverse populations across the state.

8.2 Understanding the professional profile of translators and interpreters

Language competence vs. translation competence

It should not be assumed that bilingual persons are also qualified to provide professional translation and interpretation services. Professional translators and interpreters have a specialized skill set for carrying out their services. While skill sets and specializations of translators and interpreters vary, industry standards described below frame the qualifications and credentials of professionals. Cooperative Extension only contracts professional translators and interpreters who can demonstrate appropriate and relevant qualifications and credentials.

Industry standards for qualifications and credentials

Language access only contracts with translators and interpreters whose professional experience and credentials reflect current industry standards of practice. This includes but is not exclusively limited to:

- Native or near native language proficiency in all languages of service delivery.
- Demonstrated professional experience working as a translator and/or interpreter.
- Relevant credentials that reflect educational and professional orientation in the delivery of language support services.
- Accredited translator and interpreter certification programs (State and Federal Courts, National Council on Interpreting in Healthcare, American Translator's Association, etc.).
- Preparatory courses or translator/interpreter training programs administered through technical and community colleges.
- Educational degrees in the area of translation, interpretation, linguistics, language study.

8.3 Using interpreters and translators on your own for local use

Professional translators & agencies

In addition to the criteria listed above, staff is expected to hire professional service vendors that can attest to solid professional experience as well as speak to tools, practices, processes, and credentials that support the quality of their work. This includes but is not limited to flexibility to work with documents in different formats, Computer Aided Translation (CAT) tools they may use (e.g., SDL Trados, WordPerfect, etc.), and any other additional processes they use for editing, formatting, and proofing their translations. These should be discussed in the initial conversation or meeting to understand the service vendor's process for assuring quality and how they charge for services.

Professional interpreters & agencies

In addition to the criteria listed above, CED's should look for a professional service vendor that is reputable, punctual, professional, and flexible. A professional interpreter should have a solid understanding of the scope of work as well as any additional ethical considerations for service delivery.

Building a talent pool of qualified service vendors

Cooperative Extension language access team only contracts qualified professional service vendors to provide translation and interpretation services. Please contact the appropriate district director or DASNR Human Resources with questions about the profile of service vendors we hire for projects. Likewise, we are always interested in expanding our potential pool of professional service vendors who meet the criteria listed above.

Community or volunteer interpreters

In some cases, it may be permissible to use adult (over the age of 18) community or volunteer interpreters whose specific role is to provide services during programming events. However, educators should discuss the situations or circumstances with the language access team contact prior to the event.

The use of minors as interpreters

In some cases, a minor (under the age of 18) may assume the role of an interpreter in order to bridge initial communication between two adults. However, this should be strictly limited to circumstances related to spontaneous, informal encounters. Under no circumstances should a minor be asked to provide interpretation services during a programming event, especially for situations that involve our clear legal responsibilities for providing services. (For additional information on legal implications for providing language access, see **Section 3**.)

The use of web-based translators

Web-based translators such as Google Translate are not to be used for translating organizational materials. 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 access to programming and creates a disservice to the communities we seek to serve. While easy to use and a free resource, web-based translators are not a suitable alternative to sourcing professional translators and/or working with the Language Access Team.

8.4 First point of contact; staff to serve as translators and interpreters; family

At the point of first contact with an LEP person, the Extension employee will determine whether the person has limited English proficiency by determining his or her primary language and implement or procure the appropriate language assistance service. "I speak" language identification cards are posted in the County Extension Office and are available to all employees to assist with language identification. Persons providing translation/interpretation services will either be native speakers and/or qualified interpreters. Extension employs various persons statewide who are proficient in specific languages and are able to provide assistance to customers who speak those languages. Two-way microphones and headsets are available for simultaneous interpretation at programs and events. Generally, it is not acceptable for agencies or recipients to rely upon an LEP individual's family members or friends to provide the interpreter services. The agency or recipient should meet its obligations under EO 13166 or Title VI by supplying competent language services free of cost. In rare emergency situations, the agency or recipient may have to rely on an LEP person's family members or other persons whose language skills and competency in interpreting have not been established. Proper agency or recipient planning and implementation is important in order to ensure that those situations rarely occur. Cooperative Extension currently has access to utilize a OSU wide contract for interpreter and translation services with Language Line Solutions.

Scope of responsibilities

Bilingual staff are a valuable asset to our organization because they have the ability to communicate directly with LEP audiences in a non-English language. Given the high demand for their language skills and cultural competencies, bilingual staff are sometimes asked by colleagues to provide translation and/or interpretation services that extend beyond the scope of their position. Unless it is specifically stated as a part of their position duties, bilingual staff have no obligation to translate documents or serve as an interpreter for their colleagues or office.

Training

Professional translation and interpretation requires the cultivation of a specific skill set that is developed through formalized training and experience. It is not safe to assume that a bilingual person has formal training as a translator or an interpreter. Likewise, it is inappropriate to assume that any person who has experience translating or interpreting is capable of providing services that reflect high standards of professional quality.

8.5 How to budget funds for language access needs

Interpretation services

An interpreter may charge anywhere from $30.00 to $80.00 per hour depending on individual qualifications, the language pair, and the nature of the event. Please note that many interpreters and agencies may also charge for travel time, mileage, and the use of interpretation equipment. I addition, agencies also may charge higher rates for evening or weekend hours and for interpreting in less frequently spoken languages. It is not unusual for some agencies to have policies that require a minimum of two interpreters for assignments that exceed a certain amount of time. It is important to discuss the rates and policies of interpreters and agencies prior to booking them for an event. The language access team is available to help identify measures of quality when contracting with interpreters for events.

Translating documents

Not all translators and agencies charge the same nor do they produce the same quality product. Therefore, the fastest turnaround time and cheapest rate for translating documents is not a reliable way to ensure that you are working with a quality translator. Depending on a host of different factors, a translator may charge anywhere from $0.12 to $0.22 per word. It is important to discuss how a translator charges for services and the means they use to ensure quality prior to hiring them. The language access team is available to help identify measures of quality when hiring translators for projects.

8.6 How to address language-based/national origin discrimination complaints (per Title VI)

Overview

As mentioned above, OCES is committed to nondiscrimination and takes complaints related to civil rights, Affirmative Action, Equal Employment Opportunity, and sexual harassment very seriously. A complaint or charge of discrimination or harassment can be registered by any person (employee, program or activity participant, job applicant, visitor, volunteer, etc.) who has reason to believe that they have been subjected to or witnessed unlawful discrimination, harassment, or retaliation in an Extension education program or activity, or in the employment setting.

Discrimination complaint form

The OSU Office of Equal Opportunity form for filing a discrimination complaint is available at:
https://hr.okstate.edu/equal-opportunity/reporting.html

Who can file a discrimination complaint?

Any person has the right to file a complaint.

Filing a complaint

The process following filing a complaint is available at:

https://hr.okstate.edu/equal-opportunity/

For specific questions related to discrimination complaints, please contact:

- Claude Bess, District Director, Southeast District
- Nancy Johnson, District Director, Northeast District
- Cindy Conner, District Director, West District

OSU Office of Equal Opportunity
401 General Academic Building
Oklahoma State University
Stillwater, OK 74078
405-744-7420
eeo-okstate.edu

SECTION 9

Additional resources

Organizational web page for language access support: https://ostatemailokstate.sharepoint.com/sites/dasnr/dasnrhr/SitePages/fed-prog-law.aspx#limited-english-proficiency-%28lep%29-guides-and-tools

Detailed LEP guidance can be found on the NIFA website: https://nifa.usda.gov/resource/limited-english proficiency and https://www.lep.gov/guidance/guidance_Fed_Guidance.html#USDA

Federal Inter-agency Working Group on Limited English Proficiency: www.LEP.gov

Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs: http://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

Complaint Forms: http://www.justice.gov/crt/complaint/index.php#five

Executive Order 13166: http://www.justice.gov/crt/lep/13166/eolep.pdf

Know Your LEP Population with the Language Map App: https://www.lep.gov/video/know-your-lep-population-language-map-app

Monitoring and Updating:
We will review the LAP to ensure it remains current to the LEP populations in our service area as needed, including any time new census data reveals a significant increase in LEP persons in our service area OR if a significant increase in contacts or inquires with LEP persons is evidenced. At a minimum, the language access plan will be reviewed every 5 years to ensure out LEP policies and procedures remain current and result in effective language services and meaningful access.