



SAINT PAUL
MINNESOTA

Limited English Proficiency Plan 2023

Guidelines and Procedures for the City of Saint Paul

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INTRODUCTION

Summary

As the capital of Minnesota, Saint Paul is a cultural and diversity hub. The City of Saint Paul (“City”) is committed to making its services, programs, and activities available to everyone, regardless of language barriers. As Residents, workers, and visitors who contribute to the quality of life in the City, Limited English Proficiency (LEP) individuals are entitled to Meaningful Access to City services. Additionally, as a recipient of federal funds, the City is required by federal law to plan for and provide LEP Individuals with Meaningful Access to City services, programs, and activities.

The City has thus created the LEP Plan (“Plan”) as a resource for City employees, elected officials, and contracted vendors to best support Residents and visitors of the City.

Federal LEP Mandates

The City’s LEP 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 individual shall be subjected to discrimination based on race, color, or national origin. Executive Order 13166, titled Improving Access to Services for Individuals with Limited English Proficiency (LEP), indicates that differing treatment based upon an individual’s inability to speak, read, write, or understand English is a type of national origin discrimination. This Executive Order directs Federal agencies and all state and local agencies that receive federal funds, including all City Departments, to publish guidance for their respective recipients clarifying their obligation to ensure that such discrimination does not take place.

What is the purpose of this plan?

This document is a guide for City staff, elected officials, and contracted vendors to standardize LEP access for City programs, services, and activities to better serve all Residents.

The LEP Plan seeks to standardize LEP services in the City by identifying the City’s primary non-English languages (Spanish, Hmong, Karen, and Somali), outlining Translation and Interpretation requirements of the City, outlining City Training plans,

and planned maintenance for the Plan.

Lastly, the LEP Plan is intended to be a growing document that is updated as the population of Saint Paul continues to change and grow in order to best serve the Saint Paul community.

What is included in the plan?

Saint Paul's Plan contains guidelines for internal policies, procedures, Training, and maintaining the plan, as well as background on federal mandates for LEP requirements and City-specific demographics of LEP populations.

Who is maintaining and updating the City's LEP plan?

The Department of Human Rights and Equal Economic Opportunity ("HREEO") is responsible for developing and maintaining the City of Saint Paul's LEP Plan. For questions about the City's LEP Plan, contact HREEO at 651-266-8902 or send an email to lep@ci.stpaul.mn.us.

Public information is available on the City's website at www.stpaul.gov/LEP.

City employees are directed to visit [Saint Paul Connects LEP](#) site for internal policies and procedures and to contact their Department's LEP Liaison for questions specific to their Department's LEP plan.

HREEO developed and maintains the LEP Plan following the recommendations of lep.gov by:

1. Identifying LEP Individuals who need Language Assistance
2. Undertaking Language Assistance measures
3. Training staff
4. Providing notice to LEP persons and
5. Monitoring and updating the LEP Plan

LEP Population in Saint Paul

The City's population has grown and changed significantly in the past decade. According to the 2020 census, nearly 50% of all city Residents identify as people of color. Over 100 languages are spoken by children within Saint Paul Public Schools. Nearly 15% of the population of Saint Paul has Limited English Proficiency (LEP) according to the New

Americans in Saint Paul Report from 2019¹, which is around 17,900 Residents. According to the American Census 2021, 28.8% of the Saint Paul population speaks a language other than English at home.

Here are the top languages spoken by the total number of immigrants living in the city:

- Hmong 22.2%
- Spanish 16%
- Karen 11.4%
- English 11.1%
- Somali and other Cushite languages 8.5%
- Amharic related languages 7.5%
- Vietnamese 2.2%
- Filipino, Tagalog 2.2%
- Chinese 2%
- French 1.8%
- Other Languages 26%

According to the Federal government, agencies are required to take reasonable steps to ensure Meaningful Access to their programs and activities by LEP persons. LEP.gov recommends providing written Translation for languages that are spoken by at least 1,000 LEP Residents living within a city or 5% of the LEP population, whichever is fewer.²

Based on LEP guidelines, frequency of documented encounters with LEP language groups, and in line with Saint Paul Public Schools, **Saint Paul's Primary Languages are Spanish, Hmong, Karen, and Somali.**

The Primary Languages should be reviewed and revised as necessary as Saint Paul population changes utilizing resources such as the US Census Bureau and American Community Survey, City LEP data tracking, Saint Paul Public Schools, and the MN State Demographic Center.

City Departments and employees, elected officials, and contracted vendors must be prepared to provide vital materials, resources, and services in these four LEP languages.

¹ [The Journey to Belonging in the Twin Cities Report.pdf \(stpaul.gov\)](#)

² [LEP Commonly Asked Questions](#)

Identified primary non-English language groups can change based on population changes within the City and will be updated accordingly per the US Census and/or change in frequency of encounters with LEP language groups.

For more information on general population statistics, visit the United States Census Bureau website at www.census.gov. Population data specific to Saint Paul is available on the [Minnesota State Demographer's Office website](#). Statistics on Primary Languages spoken in Saint Paul Public Schools are available through the [Minnesota Department of Education](#) and in the [Saint Paul Public Schools 2021 Language Report](#). The [2019 New Americans in Saint Paul Report](#) also contains valuable information.

How does the City use the plan?

The City remains committed to providing services to individuals with limited English proficiency. This LEP Plan outlines and describes how the City of Saint Paul will continue to improve access to its services, programs, and activities for LEP Individuals.

LEP community members and advocates can refer to the City's LEP Plan to learn about the City's commitment to ensure LEP Individuals have Meaningful Access to City services, programs, and activities. It also serves as a guide for Departments as they work to create their own Department plan and put it into practice.

The guidelines and procedures contained in this document apply to all City Departments and all City employees who interact directly and/or indirectly with LEP Individuals.

Each City Department is also required to:

- Identify at least one individual on staff to serve as that Department's LEP Liaison
- Identify how the City's LEP Plan will apply within that specific Department
- Produce its own LEP plan for how to serve Residents within that specific Department
- Budget for LEP services within that Department
- Track LEP services provided

DEFINITIONS

Terms are defined as below whenever used in this document.

Department

The term Department refers to a City Department or office, unless otherwise noted.

Identification

Identification means collecting relevant information about the:

- Number or proportion of LEP Individuals eligible for City services, programs, and activities
- Number or proportion of LEP Individuals served by the City
- Frequency of LEP services or encounters with LEP Individuals

Interpretation

Interpretation is the conversion of a spoken message from one language to another, while preserving the intent and meaning of the original message.

Language Assistance

Language Assistance is the City's good faith effort to provide LEP Individuals with Meaningful Access to its services, programs, and activities by providing, upon request, Interpretation and/or Translation services, including telephonic Interpretation.

Limited English Proficient (LEP) Individual

A limited English proficient individual is a person who does not speak English as their primary language and/or who has a limited ability to speak, read, write, or understand English. The United States Department of Justice (DOJ) states that these individuals may be entitled to Language Assistance with respect to a particular type of service, benefit, and/or encounter.

Meaningful Access

Federal standards require that organizations receiving federal funds provide LEP Individuals with Meaningful Access to their services, programs, and activities. An LEP Individual has Meaningful Access when they:

- Are given adequate information
- Can understand the services and benefits available
- Can receive the services for which they are eligible
- Can communicate the relevant circumstances of their situation to the service provider

Notification

Notification means proactively informing LEP Individuals in the City that they are entitled to City services, programs, and activities.

Primary Languages

Federal guidelines per lep.gov identifies Primary Languages as languages that are spoken by at least 1,000 LEP Individuals living in a city or 5% of the LEP population, whichever is fewer.

The Primary Languages should be reviewed and revised as necessary as Saint Paul population changes utilizing resources such as the US Census Bureau and American Community Survey, City LEP data tracking, Saint Paul Public Schools, and the MN State Demographic Center.

Public Meeting

A Public Meeting is any meeting for which members of the general public receive notice or invitation to appear for the purpose of presentation, testimony, consultation, or otherwise.

Resident

A Resident refers to anyone who lives in the City. In this document, the term Resident is not related to immigration status.

Timely

The term Timely means avoiding the effective denial or delay of benefits or services.

Training

Training refers to ensuring that City employees are familiar with LEP mandates. Each City Department, with the assistance of HREEO, shall arrange for LEP Training for their respective employees.

Translation

Translation is the conversion of a written message from one language to another, while preserving the intent and meaning of the original message.

Vital Information

Information, whether written, oral, or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or Training.

Vital Documents

The phrase "Vital Documents" refers to information or documents that are critical for accessing federally funded services or benefits or are documents that are required by law. Additionally, documents that require a signature are

considered vital.³ Vital Documents include, but are not limited to the following:

- Consent and complaint forms
- Intake forms with the potential for important consequences
- Written notices of eligibility criteria, rights, denial, loss, or decreases in benefits or services, actions affecting parental custody, child support, or resulting from other hearings
- Notices advising LEP Individuals of free Language Assistance
- Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which knowing English is not required
- Applications to participate in a recipient's program or activity
- Applications to receive benefits or services
- Short descriptions of Department or services

Non-vital documents could include the following:

- Third-party documents, forms, or pamphlets distributed by a recipient as a public service
- For a non-governmental recipient, government documents and forms
- Large documents such as enrollment handbooks (although excerpted Vital Information contained in large documents may need to be translated)
- General information about a program intended for informational purposes only

LANGUAGE SERVICES

Language Services Overview

The City's LEP Plan will guide City and City employee functions and actions, along with sub-recipients of federal funds through the City, including contracted vendors. ***This plan does not extend to organizations or entities that make use of City space for non-City events.***

The City's LEP Plan addresses how services will be provided through general guidelines and specific procedures.

Notification: Providing notice to LEP Individuals about their right to service.

Identification: Identifying LEP populations and LEP services in City Departments.

³ www.lep.gov

Interpretation: Offering free and Timely Interpretation to LEP Individuals upon request.

Translation: Providing free and Timely Translation of vital City documents upon request.

Staffing: Identifying City employees to meet LEP customer service needs.

Training: Delivering Training on LEP service mandates to all City employees.

Calculating Primary Language Groups

The Primary Languages for the City of Saint Paul are identified from a variety of sources, including the US Census Bureau and American Community Survey, City LEP data tracking, the [Saint Paul Public Schools 2021 Language Report](#), the [2019 New Americans in Saint Paul Report](#), the City of Saint Paul internal Department records of language access, and the MN State Demographic Center. Based on this data, Saint Paul's primary non-English languages are Spanish, Hmong, Karen, and Somali. Primary non-English language groups may change as new population data is collected.⁴

IDENTIFICATION

How will the City identify LEP Individuals?

All LEP Individuals are eligible for City services, programs, and activities. LEP Individuals can be identified in a variety of ways, including:

- Analyzing existing data sets, such as United States Census data or information from public agencies
- Asking LEP Individuals to indicate their preferred language using "I Speak" cards or other mechanisms

The City will collect sufficient data about services provided to LEP Individuals to continue to provide legally mandated LEP services. *Information collected about LEP Individuals must never be used to discriminate against groups or individuals.*

⁴ Based on a review of various population and language data, consistently, the top four languages are Hmong, Spanish, Karen, and Somali (not necessarily all in this order). Depending on the source and the year in which the data was collected, these four languages appear at the top, at times with Spanish ranking first and other instances ranking second, followed by Hmong. As a starting point, the City has identified its primary language groups to be Hmong, Spanish, Karen, and Somali. Primary language groups may change as new data is collected.

Except under special circumstances, City employees are not permitted to ask a LEP Individual about their immigration status, even in casual conversation. Immigration status is not relevant in determining whether an individual is eligible for the LEP services outlined in the City's LEP Plan.

Identification of Services Provided

City Departments will be responsible to keep detailed records of the LEP services they provide based on the LEP Annual Report housed in **Appendix 3: LEP Reporting Forms** and on [Saint Paul Connect LEP page](#). The records may be used to determine future levels of LEP services, evaluate changes, and make appropriate LEP budget decisions.

Guidance on keeping records and the ensuing reporting will be provided by HREEO annually. These records must be submitted to HREEO annually in early February and may also be requested by the LEP coordinator throughout the year.

Measuring Usage of LEP Services

Ways to collect information about LEP Individuals served may include:

- Adapting databases used by the City to track languages spoken by clients
- Incorporating "language spoken" fields in client intake forms and tracking responses
- Tracking telephone interpreting service usage (such as the Language Line)
- Counting website 'hits' directed to translated content
- Conducting Resident or customer satisfaction surveys
- Tallying the number of translated materials requested or distributed

NOTIFICATION

Guidelines

The City must proactively notify LEP Individuals of their right to services, programs, and activities. City Departments and their employees must ensure that LEP Individuals know they have the right to free and Timely language services as it relates to the City's services, programs, and activities.

Minimum Notification Includes:

- Information about available LEP services
- Instructions on accessing LEP services, programs, and activities- including directions to City offices
- Assurance of free and Timely LEP service

Providing Notification

Notification should be provided in Hmong, Spanish, Karen, and Somali in a variety of ways, including, but not limited to:

- Posting signs in appropriate areas, such as waiting rooms, reception areas, and other points of entry
- Including standard translated content in outreach documents, such as posters or brochures, stating that services are available
- Working with LEP organizations and other stakeholders to inform Saint Paul Residents of their right to LEP services
- Giving presentations at community meetings, schools, and other organizations, explaining Residents' rights to LEP services

Calculation of Relative Importance

Notice should be provided based on a calculation of relative importance of the information or City services, programs, and activities as it relates to the LEP Individual. Decisions on which signs, documents, or other means of providing notice should be based on criteria such as:

- Importance or urgency of service
- Volume of contact regarding an issue
- Scale of impact on the community

Determining Relative Need for Signs

Departments should assess what current signs are posted in public areas for that Department. For example:

- Do directional and instructional signs exist?
- How is the public notified of public Department services and activities?
- Is public contact information provided in Spanish, Hmong, Karen, and Somali?

Making a Standard Sign to Notify of the Right to Service

Standard signs can be downloaded from the City's Saint Paul Connect LEP Page. All city Departments should post the standard signs informing LEP Individuals of their right to free and Timely Interpretation and Translation services.

Requesting Signs

Standard signs for City offices or buildings can be downloaded from the [City's Saint Paul Connect LEP page](#). Questions about other signs should be referred to the Department LEP employee liaison.

Vital Documents

Vital Documents should include a statement in the City's non-English Primary Languages about LEP services in print, audio, and/or video materials. Vital Documents used for City services, programs and activities should include a version of the following message, translated into the City's primary non-English languages: "Attention. If you want help translating this information or need an accommodation, call 651-XXX-XXXX."

For a set of Translations of this statement to insert in or with City Department forms and documents, City employees should visit the City's LEP SharePoint on Saint Paul Connect. To view an example, **see Appendix 1: Language Block.**

INTERPRETATION

Providing Interpretation

Interpretation can be provided in a variety of ways:

- Bilingual City employee volunteers
- Approved City contract vendor providing in-person Interpretation services
- Virtually with contracted Interpretation vendors
- On-call interpreters through the Language Line

Interpreters must be offered for free, if needed. The City must provide interpreters, free of charge, to LEP Individuals, if needed to receive Meaningful Access to City services, programs, and activities.

Public Meetings will have interpreters available, if requested and needed.

Public Meeting notices must include Notification language that states interpreters will be provided upon request. Depending on the contact and vendor, Departments may determine that a three to five day notice prior to the meeting is required.

Interpretation is more than the ability to speak two or more languages. Interpretation is the conversion of a spoken message from one language to another while preserving the intent and meaning of the original message. Interpreters must be skilled and competent. The City will use competent and culturally sensitive interpreters, appropriate to the level of Interpretation required by law.

Professional interpreters must be able to demonstrate at least one of the following:

- Evidence of Training that includes skills and ethics of interpreting
- Ability to convey information in both languages, accurately and completely, as

demonstrated by a simulated interpreting encounter

- Fundamental knowledge in both languages of any specialized terms or concepts related to a City Department's service, program, or activity

Professional standards apply to all interpreters and translators hired to deliver City services. Interpretation services for the City will be carried out by professional interpreters, whether they are City employees or contracted interpreters and translators. City employees who work as interpreters and translators must demonstrate competence as defined above. With contract interpreters, whether providing services in person, on the telephone, or virtually, contracting agencies must demonstrate how competency is assessed.

Family, Friends, & Volunteers as Interpreters

City employees may not urge or require those who speak little or no English to provide their own interpreter. Volunteers, friends, and/or family members should not be expected to interpret. Additionally, the use of untrained volunteers exposes the City to liability related to its legal obligation to provide interpreter services. For reasons of accuracy, confidentiality, and because of family dynamics, minor children (under 18) should not interpret for family members or other LEP Individuals. This guideline, however, does not apply in serious emergency cases when a minor child, a volunteer, or a friend is the only available potential interpreter.

LEP Individuals, however, may use their own interpreter if they waive their right to an interpreter provided by the City. Individuals waiving the right to an interpreter provided by the City will be asked to sign a waiver form. **See Appendix 2: Waiver of Interpretation/Translation Services.**

If the effectiveness of service may be compromised or the LEP Individual's privacy may be violated, a City provided professional interpreter should be used.

Administering a waiver of the right to an interpreter

After working through an interpreter and ensuring that the individual waiving services does not want to use a City provided interpreter, use the **Waiver of Interpretation/Translation Services form**. City employees should visit the [Saint Paul Connect LEP Resources page](#) to download the waiver form. To view the waiver form, see **Appendix 2: Waiver of Interpretation/Translation Services.**

Interpretation must be Timely

Access to Interpretation services in all City Departments must be Timely and no one may be denied access to services based on the lack of interpreter availability. The City maintains contracts with several vendors to provide Interpretation services. Many of these services must be arranged in advance—but not all. The City maintains a state contract with the Language Line to provide 24/7, seven days a week access to on-demand interpreters and every employee currently has access to the Language Line through their Department. City Departments that use Language Line services will be charged for using them via their individual Department access code.

Please contact lep@ci.stpaul.mn.us or your Department's LEP Liaison for your Department's Language Line access code if you do not have it already.

Language Line Instructions

1. Ask the Resident for their preferred language and place the Resident on hold. If in-person, ask the Resident to wait while you dial the Language Line.
2. Dial 1-800-367-9559
3. Enter the 6-digit Client ID: 509052
4. Press 1 for Spanish, 2 for all other languages
5. Say the name of the language when prompted
6. Press 0 for assistance if needed
7. Enter 6-digit Department Access Code: _____
8. Press # sign
9. An interpreter will be connected to the call
10. Brief the interpreter on the needs at hand
11. Place Language Line on conference call hold
12. Reconnect Resident on hold
13. Connect the interpreter

Accessing an interpreter through a contracted vendor

In addition to contracting with the Language Line, the City maintains contracts with several other vendors to provide Interpretation services, generally in-person, or virtually.

To access an interpreter, City employees must refer to the interpreter vendor list as identified in the City's contracts with approved vendors for Interpretation services.

City Departments that use these services will have to make any arrangements based on their need and will be charged directly for the service. City employees should [visit the Saint Paul Connect LEP page](#) for more information on how to access an

interpreter through a contracted vendor or can contact their Department's LEP Liaison.

TRANSLATION

Translation of Vital Documents must be offered for free, if needed.

The City must provide a Translation of Vital Documents, free of charge, to LEP Individuals to receive Meaningful Access to City services, programs, and activities, if needed.

Vital Documents must be in Primary Languages

Vital Documents must be available in the City's Primary Languages or readily translated by an interpreter, upon request. Please keep in mind, in rare circumstances it could be possible that a translator may be unavailable in a rare language. City Departments must have the capacity to translate documents into the four primary non-English languages upon request and in a Timely fashion.

The City will use professional and culturally sensitive contract translators, appropriate to the level of Translation required by law, or bilingual City employee formally trained in Translation. Materials translated must be evaluated for accuracy of Translation.

Please Note: the skill of translating is very different from the skill of interpreting. An individual who is a competent interpreter may or may not be competent to translate. A translator should understand the expected reading level of the audience and where appropriate, have fundamental knowledge about the target group's vocabulary and phraseology.

Translators must demonstrate one or more of the following:

- Evidence of Training that includes skills and ethics of Translation
- Proficiency in English and the other language, as documented in an objective language proficiency test if such a test is available
- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated Translation request
- Fundamental knowledge in both languages of any specialized terms or concepts

With approved contract translators, contracting agencies should demonstrate how competency is assessed.

Website Accessibility

For the scope of this LEP Plan, website accessibility refers to maximizing the accessibility of stpaul.gov to LEP persons.

The City's website is our direct connection with Residents of Saint Paul and is often the first place people turn to for information and updates regarding the City. It cannot be overstated how important it is for stpaul.gov web editors to understand digital accessibility principles to best serve LEP persons.

Uploaded documents, in particular PDFs, are often barriers to digital accessibility because they cannot be translated automatically by the Google Translate app or read by screen readers. If possible, upload a document as a web page so that the Google Translate app embedded on each page of stpaul.com can be translated if desired by a web user.

As of May 2023, each page of stpaul.gov has the option to be translated via an embedded Translation option from Google Translate.

Please note that translating pages into Spanish via Google Translate tends to be fairly accurate, but as of May 2023 Hmong, Karen, and Somali do not tend to translate from English very accurately.

If you are uploading Vital Documents onto the website, use a translator to translate the information into Spanish, Hmong, Karen, and Somali to ensure the most accuracy.

Website pages can be translated by technology tools, but items stored online as images, PDFs, jpeg or .png files for example cannot be translated automatically. Images with Vital Information must be sent to a translator.

As best practice for website accessibility, Departments should consider moving away from storing essential information online as images, PDFs, jpeg or .png files, etc.

General website accessibility tips:

- Use clear, simple language
- Avoid technical jargon if possible
- Avoid putting important messages in .jpg or .png formats as automatic Translation software cannot read words on images.
 - Any .jpg or .png images will need to be translated if the information is

vital.

Volunteers, friends, or family members should not translate materials unless deemed appropriate for the situation. City employees may not urge or require those who speak little or no English to provide their own translator. Volunteers, friends, and/or family members should not be expected to translate. Additionally, the use of untrained volunteers exposes the City to liability related to its legal obligation to provide Translation services. For reasons of accuracy, confidentiality, and because of family dynamics, minor children (under 18) should not interpret for family members or other LEP Individuals. This guideline, however, does not in serious emergency cases when a minor child, a volunteer, or a friend is the only available potential translator.

LEP Individuals, however, may use their own translator if they waive their right to a translator provided by the City. Individuals waiving the right to a translator provided by the City will be asked to sign a waiver form. **See Appendix 2: Waiver of Interpretation/Translation Services.** If the effectiveness of a City service, program or activity may be compromised or the LEP Individual's privacy may be violated, a City translator should be used.

Administering a waiver of the right to a translator

When working with an individual who has identified themselves as LEP, it is advised that a City staff member work with an interpreter to explain a community member's rights to a translator.

If a community member does not wish to utilize a City-provided translator, please use the Waiver of Interpretation/Translation Services form. City employees should visit the City's LEP page on Saint Paul Connect to download the waiver form. To view the waiver, see Appendix 2: Waiver of Interpretation/Translation Services.

Individuals using volunteer translators must sign a waiver form

Individuals waiving the right to Translation will be asked to sign a waiver form in their own language. **See Appendix 2: Waiver of Interpretation/Translation Services.**

Translation must be Timely

Access to translated materials in all City Departments must be Timely. No one may be denied access to services, programs, and/or activities based on the lack of translated materials or documents.

Providing Translations

Translation can be provided in a variety of ways:

- Bilingual City employee trained in Translation
- Other City employee translators
- Contract or freelance professional translators providing oral, on-site Translation
- Contract or freelance professional translators providing work in advance of a community member's need

Accessing Translation services through a contracted vendor

The City maintains contracts with several vendors to provide written Translation of documents. City Departments that use these services will be charged directly from the vendor for them. To access a translator, City employees must refer to the translator vendor list as identified in the City's contracts with approved vendors for translator services. City employees should visit the City's [LEP SharePoint website](#) for a list of approved translator vendors.

TRAINING

Overview of Training

It is important to ensure that all City employees are given proper LEP Training. City employees should know their obligations to provide LEP Individuals with Meaningful Access to City services, programs, and activities. The more frequent the contact with LEP Individuals, the greater the need for Training.

Even City employees with little or no contact with LEP Individuals should be aware of the City's responsibility to provide language access, the City's LEP Plan, and their respective Department's LEP Policy. City employees in management positions, even if they do not interact regularly with LEP Individuals, should be fully aware of and understand the City's LEP Plan and their respective Department's LEP Policy so they can reinforce the importance and ensure the implementation of the City's LEP Plan and their Department's LEP Policy.

At a minimum, the City will ensure:

- All City employees have access to the City's LEP Plan
- Departments understand their responsibility to ensure all City employees in public contact positions are trained to work effectively with in-person, virtual and/or Language Line interpreters
- All City employees have access to Training

HREEO & Human Resources Shared Training

LEP Training on a city-wide level will be planned and carried out by the City Departments of Human Resources (HR) and HREEO. This Training will primarily be focused on new City employees and will be geared toward our LEP obligations with the public as Language Line Training will now be part of the City's orientation for new City employees.

HREEO Specific Training

HREEO will conduct "train-the-trainer" sessions for all the LEP Department liaisons on an annual basis and by request. LEP Department liaisons will be, in turn, expected to lead and carry out Training efforts for their respective Departments and employees.

Department Specific Training by LEP Liaisons

Each City Department will develop its Department specific LEP Training based on the specific Department's LEP Plan. The Department-specific Training will be led and carried out by the designated LEP Department liaison.

IMPLEMENTING, MONITORING, AND UPDATING THE PLAN

Updating and maintaining the City's LEP Plan is the responsibility of HREEO. Updating a Department LEP Plan is the responsibility of each Department.

HREEO Responsibilities

HREEO will evaluate the City's LEP Plan on a regular basis to determine its effectiveness. The evaluation will include:

- Identification of the LEP population in Saint Paul and recalculation of the City's primary language groups
- Evaluation of complaints (both at the City Departmental level and the City level)
- Work with each Department to assess the current level of services delivered to LEP Individuals by each City Department and identify additional needs
- Reporting on the LEP Training received by City employees
- Reporting of activities by each City Department

HREEO will maintain and update the City's LEP information page on the City's website at www.stpaul.gov/LEP. HREEO will also maintain and update the City's LEP Plan on Saint Paul Connect.

HREEO will also monitor and work with City Departments to ensure that they develop and maintain their Department LEP plans in accordance with the policies and guidelines provided in the City's LEP Plan and per federal and state regulations.

Department Responsibilities

Each City Department will be responsible for creating a LEP plan whereby that Department identifies how the City's LEP Plan will apply to its respective Department. Each City Department will be required to submit a copy of its Departmental LEP plan to HREEO within three months of the effective date of the City's LEP Plan. Each time HREEO revises the City's LEP Plan, City Departments will be responsible for revising their LEP Department Plan accordingly.

A City Department's LEP Plan must identify, at minimum, the following:

- Primary language groups if different than the four languages identified in the City's LEP Plan and why they are different
- Procedures for handling complaints about LEP services
- Steps to notify customers and community members of Translation and Interpretation services
- Steps employees should take to ensure Timely and accurate Interpretation services are provided
- Steps employees should take to ensure Timely and accurate Translation projects are conducted
- Training Department employees will receive on LEP issues
- Steps that will be taken to successfully implement LEP services in that Department
- Steps for monitoring and updating the Department LEP Plan
- Department resources dedicated to providing LEP services to community members

Each City Department is also required to:

- Identify at least one individual on staff to serve as that Department's LEP liaison
- Identify how the City's LEP Plan will apply within that Department
- Budget for LEP services within that Department

City Departments will be responsible for ensuring that they provide HREEO with the most up-to-date electronic copy of their Department LEP Plan. City Departments will also be responsible to keep detailed records of the LEP services they provide. Departments will be required to submit these records to HREEO on a set timetable and may also be requested to submit on a need- to-know basis.

Guidance on keeping records and the ensuing reporting will be provided by HREEO.

See Appendix 3 for LEP Reporting Forms.

Incorporating City Department Level LEP Evaluations, Plans, & Budgets into Annual Budget Plans

During every budget cycle, City Departments will assess their Department's LEP Annual Report evaluate the services it provided to LEP Individuals. **Please see Appendix 3 for the Departmental LEP Annual Report template.** Based on their assessment and evaluation, each City Department must budget funding for translating and interpreting needs into its own annual Departmental budget. City employees are directed to visit [Saint Paul Connect LEP](#) site or to contact their Department's LEP Liaison for questions specific to their Department's LEP plan.

Contractor Responsibilities

City contracted vendors and sub-recipients of federal funds through the City will be directed to read and follow the City's LEP Plan. Language to ensure compliance with language access and the City's LEP Plan should appear in City contracts. Contractors and vendors will be responsible for notifying and Training their employees about LEP mandates. HREEO will be responsible for providing City Departments with the necessary LEP language requirements to include in all City contracts.

COMPLAINT PROCESS

Overview of Complaint Process

Anyone who has a complaint regarding how a service, program, or activity was inaccessible due to LEP services should contact the LEP Coordinator in HREEO at lep@ci.stpaul.mn.us or 651-266-8902.

A complaint form should be filled out and filed with the LEP Coordinator. See **Appendix 4: LEP Language Access Public Complaint Form.**

Such complaints should include the following information:

- Name, mailing address, and contact information (i.e., telephone number, email address, etc.).
- How, when, where, and why complainant believes they received unsatisfactory service, including the location.
- Names and contact information of any witnesses.
- Other information that complainant deems significant.

Complainants shall file at least 180 days or six months from the alleged date of occurrence to file a complaint with the City.

What happens to a complaint once it is submitted to HREEO?

The complaint will be responded to or acknowledged within 10 working days of receipt.

Within 30 calendar days of the complaint receipt, the LEP Coordinator will conduct the investigation necessary to determine the validity of the violation. If appropriate, the LEP Coordinator will arrange to meet with the grievant to discuss the matter and attempt an informal resolution of the complaint. Any informal resolution of the complaint will be documented in the City's LEP Complaint File.

If an informal resolution of the complaint is not reached, the LEP Coordinator shall issue a written determination of the validity of the complaint and a description of the resolution no later than 60 days from the date of the City's receipt of the complaint. A copy will be forwarded to the complainant and the City Department against which the complaint was submitted.

How will the complainant be notified of the outcome of the complaint?

HREEO will send a final written response to the complainant via US Mail or by email.

If the letter or email notifies the complainant that the complaint was not substantiated, the complainant will also be advised of their right to 1) appeal within seven calendar days of receipt of the final written decision from HREEO, and/or 2) file a complaint externally with the State of Minnesota Department of Human Rights.

Appeals Process

The complainant may request reconsideration if he/she is dissatisfied with the written determinations. The request for reconsideration shall be in writing and filed with HREEO's Deputy Director of Human Rights within 30 days after the LEP Coordinator's determination has been sent to the complainant.

The Deputy Director shall review the request for reconsideration and make a final

determination with 60 days from the filing of the request.

If the complainant is dissatisfied with the City's handling of the complaint at any point, they may file a complaint directly with the State of Minnesota Department of Human Rights.

RESOURCES AND REFERENCES

- ❖ [2019 New Americans in Saint Paul Report](#)
- ❖ [American Council of Teachers of Foreign Languages \(ACTFL\)](#)
- ❖ [City of Saint Paul LEP SharePoint](#) (*this is an internal website is for City employees ONLY*)
- ❖ [City of Saint Paul LEP Website](#)
- ❖ [The Journey to Belonging in the Twin Cities Report](#)
- ❖ [LEP.gov](#)
- ❖ [LEP Commonly Asked Questions](#)
- ❖ [LEP Final Guidance - FAQs | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)
- ❖ [Minnesota Department of Education](#)
- ❖ [Minnesota State Demographic Center](#)
- ❖ [Saint Paul Public Schools 2021 Language Report](#)
- ❖ [United States Census Bureau](#)
- ❖ [United States Department of Justice – Civil Rights Division](#)

APPENDIX

Appendix 1: Language Block

Appendix 2: Waiver of Interpretation/Translation Services

Appendix 3: LEP Reporting Forms

Appendix 4: LEP Language Access Public Complaint Form

Appendix 1: Language Block

The following language block can be inserted in City documents and forms. Please update the contact information for each language before inserting into documents.

Attention

If you want help translating this information or need an accommodation, please contact employee@ci.stpaul.mn.us 651-XXX-XXXX

Atención

Si desea recibir asistencia gratuita para traducir esta información o necesita un alojamiento, contactor employee@ci.stpaul.mn.us 651-XXX-XXXX

Hmong

Lus ceev

Yog koj xav tau kev pab txhais cov ntaub ntawv no los sis xav tau kev npaj kom yooj yim, ces thov tiv toj employee@ci.stpaul.mn.us 651-XXX-XXXX

Karen

ဒီကန့်

နမ့်လိန်ဘန်တင်မၤၤလၢတၢ်ကွဲးကျိၣ်ထံဘန်တၢ်ဂ့ၢ်တၢ်ကျိၣ်အံၤ မ့တမ့ၢ်

လိန်ဘန်တၢ်ဟ့ၣ်ကူၣ်ဟ့ၣ်ဖးန့ၣ် ဝံသးစူၤဆဲးကျါ employee@ci.stpaul.mn.us 651-XXX-XXXX

Somali

Haddii and rabto in macliiumaadkan lagu tarjumo ama and u baahantahay adeeg nala soo xiriir employee@ci.stpaul.mn.us 651-XXX-XXXX

Appendix 2: Waiver of Interpretation / Translation Services



City of Saint Paul
15 West
Saint Paul, MN 55102
651-266-8989
www.stpaul.gov

WAIVER OF INTERPRETATION/TRANSLATION SERVICES

I, _____ have been informed of my right to received free and Timely Interpretation/Translations services from the City of Saint Paul if the Interpretation/Translation services are needed to access City of Saint Paul services, programs, or activities as per Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000 et seq.

I understand that I am entitled to these services at **no cost** to myself or other family members, but I want to provide my own interpreter/translator as this time.

_____ will act as my interpreter/translator.

Initial

_____ I understand that I can withdraw this waiver at any time and request the services of an interpreter/translator, which will be paid for by the City of Saint Paul.

_____ To the best of my knowledge, the person I am using to act as my own interpreter/translator is over the age of 18.

_____ I understand that this waiver pertains to interpreter/translator services only and does not entitle my interpreter/translator to act as my Authorized Representative.

Signature of Service Recipient: _____

Date: _____

Appendix 3: LEP Reporting Form



SCHEDULE FOR LEP REPORTS

To evaluate and update the City of Saint Paul's LEP Plan, the Department of Human Rights and Equal Economic Opportunity (HREEO) developed the following reports to be completed by all City of Saint Paul Departments.

Questions or information about these reports should be directed to LEP@ci.stpaul.mn.us

Report	To be completed by	Return to	Due Date
LEP Annual Report	LEP Department Liaison	LEP@ci.stpaul.mn.us	February 15 of each year

Employee Language Report

Voluntary Participation: Please include employees who possess language skills other than English and who are willing to assist an LEP individual who requires language assistance. This list should be used within your department only. This list should not be shared with other departments. Exceptions: Office of the Mayor, HREEO, Emergency Management and for use in emergency

Return report to LEP@stpaul.gov by **February 1 of each calendar year.**

Department:

Date:

LEP Department Liaison:

Employee Name (Last, First)	Employee Phone	Language	Speaking			Reading			Writing		
			Basic	Advanced	Native	Basic	Advanced	Native	Basic	Advanced	Native
(Place an 'x' in the column to indicate level of language skill)											
Example: John Doe	266-6686	Spanish		X			X		X		

Revised 01/24/2011

SAMPLE ONLY

LEP Annual Report

Department:
Telephone:

Contact Person:
Report for Year:

LEP Encounters

Total # of encounters: _____

Please check only one box for the following:

Language most frequently requested: Spanish Hmong Somali Karen Other

If other, please specify: _____

LEP service most frequently used: Oral Interpretation (in person) Oral Interpretation (virtual) Written Translation

Telephone Interpretation American Sign Language

Other

If other, please specify: _____

Most frequent method LEP service is rendered: Employee Contractor

Community Volunteer LEP Person's Family/Friend Other Method

If other, please specify: _____

LEP Expenditures

Total LEP \$ expenses: _____

Spanish: \$ _____ Hmong: \$ _____ Somali: \$ _____
 Karen: \$ _____ Other Language/s: _____ : \$ _____
 _____ : \$ _____
 _____ : \$ _____
 Oral Interpretation (in person): \$ _____ Oral Interpretation (digital) \$ _____
 Written Translation: \$ _____ Telephone Interpretation: \$ _____
 American Sign Language: \$ _____
 Other service (specify): _____ \$ _____

Translation of Documents

Total # of documents translated upon request: _____

Total # of Vital Documents translated: _____

of Type of Documents Translated

____ Application ____ Brochure ____ Notice ____ Other Document

If other, please specify: _____

LEP Level of Satisfaction:

Total # of complaints: _____ Total # of complaints resolved: _____ Total # of satisfied customers: _____

Complaint Information

Date filed	Date resolved	Description

LEP Areas	Yes	No	Explanation/Comment
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Departmental LEP Plan

1. Does the Department have a Departmental LEP Plan that identifies how the Department will implement the City's LEP Plan specific to the Department's core operations? If no, explain why no Department-specific LEP			
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plan exists.			
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Assessing and Recording Language Needs

2. How has the Department taken steps to identify the non-English languages that are likely to be encountered in its service delivery area?			
3. How has the Department identified the language needs of LEP community members? Give specific examples. How does the Department record information about how and when LEP community members needs are served?			
4. Does the Department document the name and affiliation (e.g. staff interpreter, contract interpreter, etc.) of the person providing language services for each encounter with an LEP Individual?			
5. When an LEP Individual declines an offer for Interpretation/Translation services, is this documented?			
6. Has the Department identified the points of contact within their organization where Language Assistance is likely needed (e.g. reception desks, intake counters, patrol, etc.)			
7. Has the Department identified the resources that will be needed to provide effective Language Assistance, and the location/availability of these resources?			
8. How has the Department made arrangement to access Language Assistance resources in a Timely fashion so that services to LEP Individuals are not delayed or denied?			

Oral Language Interpretation

<p>9. Does the Department provide employee Training on using the Language Line for telephone interpreter service(s)?</p>			
<p>10. Does the Department ensure that all interpreters understand their obligation to maintain client confidentiality?</p>			
<p>11. Does the Department inform LEP Individuals that all interpreters are obligated to maintain confidentiality?</p>			
<p>12. How does the Department communicate the prohibition of the use of inappropriate methods for providing Interpretation services to LEP Individuals? Inappropriate Methods include:</p> <ul style="list-style-type: none"> • Use of staff or volunteers who are unfamiliar with the required vocabulary • Use of staff or volunteers who are not trained or competent in the skill of interpreting • Use of signals, drawings, or pictograms • Use of minor-aged children, unless it is an emergency (e.g. fire situation) • Use of adult family members or friends as interpreters, unless it is specifically requested by the LEP Individual and would not compromise the services provided or violate the LEP Individual’s confidentiality 			

Translation of Written Materials

<p>13. Does the Department provide written materials in languages other than English?</p>			
<p>14. Does the Department provide notice in the identified Primary Languages of the right to</p>			

receive free Interpretation and Translation services?			
15. Does the Department ensure translated materials are translated correctly by having staff with appropriate language abilities review the materials before print and dissemination to the public, including on stpaul.gov?			

Methods for Providing Notice to LEP Individuals

16. Does the Department use language identification cards to determine the language needs of LEP Individuals?			
17. Does the Department post signs in other languages in reception areas and other initial points of entry notifying LEP Individuals that Language Assistance services are available free of charge?			
18. Does the Department include a statement in brochures and other materials routinely disseminated to the public notifying LEP Individuals that Language Assistance services are available?			
19. Does the Department translate application forms and other materials into non-English languages using competent translators?			

Training of Staff

20. Have all staff been trained in the City's LEP Plan and the Department's LEP policy for addressing language needs of LEP Individuals?			
21. Does the Department present its policy and procedures for addressing the needs of LEP Individuals during the orientation of new			

employees?			
22. Does the Department maintain records of which staff have receiving Training in how to meet the Language Assistance needs of LEP Individuals?			

Monitoring

23. Does the Department monitor its LEP policy and procedures at least annually to evaluate its effectiveness at serving LEP Individuals and modify it accordingly?			
24. Has the Department identified any problem area or areas needing improvement in completing this report? If yes , please explain and identify what corrective actions have or will be taken and when.			

Customer Service

25. Does the Department track customer feedback on customer service provided to LEP Individuals?			
26. Does the Department have a complaint process in place to address concerns and complaints from LEP Individuals about the Department's LEP services?			
27. Does the Department track the number of complaints and concerns received?			
28. Has the Department successfully addressed LEP complaints and concerns? If no , please explain and identify what corrective actions have or will be taken and when.			

LEP Budget

29. How does the Department budget for LEP			
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services in its annual budget projections? If yes , detail how much and in what areas. If no , explain why no budget exists for LEP services.			
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Comments

If you have additional comments, please include it here or attach additional sheets.

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Appendix 4: LEP Language Access Public Complaint Form



CITY OF SAINT PAUL

Department of Human Rights and Equal Economic Opportunity
(HREEO)

LEP Language Access Public Complaint Form

Title VI, 42 U.S.C. § 2000 et seq., enacted as part of the 1964 Civil Rights Act requires that *"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."*

If you feel you have been impacted as a result of non-compliance with Title VI of the Civil Rights Act of 1964 and you have sought to resolve the matter with the associated City Department wherein which the alleged incident took place and were not satisfied with the results of that investigation, you may submit a formal complaint to HREEO, the City Department in charge of the city-wide LEP plan.

Disclaimer: Information required herein will assist the City of Saint Paul Department of Human Rights and Equal Economic Opportunity (HREEO) to determine whether your allegations represent a possible violation to the City of Saint Paul Limited English Proficiency (LEP) Plan. Please complete the following form in its entirety and to the best of your knowledge. This form is subject to review and acceptance by HREEO.

Today's date: _____

Primary Language: _____

Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____

Telephone Number: (home) _____ (cell) _____

Name of person affected: _____

Address of person affected: _____

City: _____

State: _____ Zip Code: _____

Date of alleged occurrence: _____

Where did the alleged occurrence take place? Please identify the City Department.

Nature of complaint: Lack of assistance in your language
 Lack of translated materials

Other (please specify): _____

Name of the City employee who tried to assist you: _____

Did you alert City employee of your language preference? Yes No

If yes, how?

Did you request any translated materials from the City Department accessing?

Yes No

If yes, how?

Were the documents translated in your language? Yes No

Have you tried to resolve the matter with the City Department? Yes No

If yes, please provide the following information:

Date when you tried to resolve the matter: _____

Name of the individual you spoke with (if known): _____

Response from the City Department:

Describe how you were not provided Meaningful Access to City services and programs:

Please list any and all witnesses' names and phone numbers:

What type of corrective action would you like to see taken?

Please provide the name of the individual and/or organization that assisted you in completing this form (if applicable):

Name: _____ Organization: _____

SUBMITTING THIS COMPLAINT FORM DOES NOT CONSTITUTE THE FILING OF A CHARGE.

The receipt of this complaint form by HREEO will act as the filing date of the complaint.

Please keep a copy for your records.

Signature: _____

Date: _____

Print name: _____

Please attach any documents you have which support the complaint and send to:

**City of Saint Paul- HREEO
LEP Complaint Form
15 West Kellogg Boulevard, CH 280
Saint Paul, MN 55102**

The City of Saint Paul is committed to improving access to its programs, services, and activities for individuals who are Limited English Proficient. **This form is available in alternative languages upon request.**