



Cooperative Extension Program

Cooperative Extension Program Language Access Plan

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PURPOSE

It is the policy of Prairie View A&M University Cooperative Extension Program (CEP) to ensure that reasonable steps are taken to provide timely and meaningful access to our programs, services, and activities for persons with limited English proficiency (LEP). A person with limited English proficiency has a limited ability to read, write, speak, or understand the English language.

This language access plan (LAP) outlines the policies and procedures that guide the reasonable steps CEP and its employees must take to meet this standard. This LAP applies to all programs, activities, and services carried out by, or in coordination with, CEP. The LAP will be reviewed and updated as necessary every year. The dean of the college, CEP associate executive director, and LEP program coordinator will provide ongoing administrative oversight for monitoring and evaluating the reach and impact of language access efforts.

WHAT IS LANGUAGE ACCESS?

Language access is providing limited English proficient, blind, low vision, deaf, and hard of hearing people with reasonable access to the same services as English-speaking and non-sensory limited individuals. CEP provides the appropriate accommodations (e.g., translation and interpretation) to mitigate communication barriers caused by language differences and creates programming, services, and activities that are culturally responsive and linguistically appropriate for persons with limited English proficiency.

Why Language Support Services are Needed

We value opportunities to educate individuals and families, enrich communities, and build relationships throughout the state of Texas. We do not want to limit CEP's ability to fulfill its mission due to communication barriers. Our organization is committed to inclusive practices in programs and activities that help build stronger relationships with linguistically and culturally diverse audiences. To realize this commitment, we need to ensure that persons who may be limited in their ability to communicate effectively in English, and employees 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.

Language Access as a Legal Requirement

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in federally supported activities. According to the law, a person's language is an extension of their national origin. Individuals and communities that speak languages other than English are protected from being the targets of discrimination in federally supported activities, see *Lau v. Nichols*, 414 U.S. 563 (1974).

The legal framework for language access accountability establishes that recipients of federal support must take reasonable steps to ensure that LEP populations have meaningful access to programs, activities, and services. Since CEP programs, services, and activities receive financial and other types of support from federal sources, the corresponding legal framework apply to the entire organization and employees and staff acting on its behalf. The following core set of laws, policies, and regulations formulate the legal standards for CEP's language access accountability and non-discrimination compliance:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 (2000)
- U.S. Department of Agriculture Final Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency (2014)
- National Institute of Food and Agriculture's Limited English Proficiency (LEP) Implementing Strategy for Federally Assisted Programs (2016)

Four-factor analysis

Federal authorities use a four-factor analysis to evaluate organizational standards for ensuring language access obligations. 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:

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

Ensuring Non-Discrimination of LEP Persons

General educational programming

CEP may be legally obligated per Title VI to provide language support services in educational programming based on, among other considerations, 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 program coordinator.

Vital documents

Though any document used by CEP in an official capacity is subject to translation, some documents are considered vital and should be available at all times in languages other than English based on the language demographics of the county. These written documents include, but are not limited to, consent and complaint forms, intake and application forms with the

potential for important consequences, written notices of rights, and notices of denials. See [Vital Documents.pdf](#) for more information.

Public request for language support services

CEP is legally obligated to and will provide language support services such as translation and interpretation at no cost to the intended beneficiary of such services when a member of the public requests services for themselves or someone else who has limited English proficiency for access to CEP programs, services, and activities. It is unlawful to deny a request for language support services from a person who is a participant, or who wants to participate, in CEP programs, services, and activities.

Maintaining Meaningful Access

Expand programming access to underserved populations

CEP categorizes LEP persons as an underserved population. In addition to federal non-discrimination laws, expanding program access to serve LEP audiences is an integral part of CEP's mission and one of its core organizational priorities. 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.

Public notification of language support services

CEP 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 this notice in multiple languages as appropriate. The non-discrimination statement and language access notice will be posted on all publicly disseminated materials. See Non-Discrimination Usage Guide for more information.

Maintain records of efforts to identify and serve LEP audiences

Our organization will keep records showing evidence of honest efforts to provide language assistance to audiences. Record keeping related to language access needs across the organization may include, but is not limited to Program Evaluation And Reporting System (PEARS), email, and Google Docs records.

The program coordinator may track language support services used (language support requests, archives of translated materials, events that used interpreters, service delivery evaluations, etc.) with logistical information provided such as time, date, name of presenter, event video, and pictures.

Training

On an ongoing basis, CEP program leaders, in conjunction with the program coordinator, will provide leadership for training on best practices that help the organization address its language access needs and meet goals.

CEP will conduct Title VI and LEP training as necessary to support language access efforts but at least a minimum of every two years as recommended by National Institute of Food and Agriculture. All newly hired employees will receive these trainings within the first thirty (30) days of employment.

Employees are encouraged to seek professional development opportunities regarding language access. If you have questions related to training, please contact the program coordinator at aawilliams@pvamu.edu.

LANGUAGE ACCESS SUPPORT FOR PROGRAMMING

Eligibility for requesting and receiving organizational support

CEP employees working within the scope of their position duties and responsibilities are eligible to request and receive support for language access needs. The amount of time needed to complete projects depends on the size of the project, its various components, and other factors. All requests for services (interpretation, translation, etc.) should be made four (4) weeks in advance. The program coordinator will be able to provide a more specific turnaround time once a Language Service Request is submitted.

Cost for Requesting Support

Cost implications, if any, are discussed with the requester prior to authorizing any work on a project and are determined based on the nature of each project. Program areas may be partially or wholly responsible for sharing the costs of providing translation and interpretation services. The program coordinator, in coordination with program area leadership, will determine funding implications and cost sharing responsibility for projects.

Projects requiring additional approval

Project or events can vary in size and scope which may warrant additional considerations for administrative decisions and funding. Thus, requesters may need to seek additional approval from program area leadership. The program coordinator will communicate with the requester if additional approval is needed and provide guidance as appropriate.

Language Service Request Form

The Language Service Request (LSR) form provides a centralized, streamlined way for CEP employees to receive language access support for programming. The form is available online at https://pvamu.co1.qualtrics.com/jfe/form/SV_bDF9OonJCOvEAKi. The LSR was designed to minimize delays in providing language support services; however, depending on the nature of the project and the information provided, the program coordinator may have additional questions, need additional details, or want to discuss your project/event further.

AVAILABLE LANGUAGE SUPPORT SERVICES

Project Management

Translation project management

Translation makes text-based materials available in more than one language. Support with translation project management may include determining translation needs for the target audience, sourcing the appropriate translation service vendors, and obtaining cost quotes. The translation project management process helps consolidate the costs, energy, and time involved with creating multilingual materials.

Interpretation services

Support for providing interpretation services may include determining language needs for the target audience, sourcing appropriate interpreter service vendors, obtaining cost quotes, and ensuring that services are carried out in a professional and ethical manner.

Programming and project consultation

With CEP's goal to promote greater inclusion of linguistically underserved populations, programming must be offered in a way that is both culturally responsive to LEP persons needs and linguistically appropriate for the situation. General consultation on language access needs for planning programs and projects is also an available support. The program coordinator helps CEP 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.

Assistance for communication disabilities

The Americans with Disabilities Act (ADA) protects individuals who are blind, low vision, deaf, and hard of hearing. Accommodations provided under ADA are different than the language accommodations provided under Title VI. However, we are committed to working collaboratively with the appropriate persons to ensure that any request for a language accommodation, regardless of the audience or type of barrier, is met with the proper organizational response.

Emergencies

During emergencies (such as natural disasters that may pose immediate risks to the health, life, environment, or property of Texas residents) immediate dissemination of critical information to the public may need to be communicated and coordinated within CEP service areas. Our program coordinator will partner with county emergency management officials in case of a disaster. For immediate assistance with multilingual communication during emergency situations, please contact (936) 261-5166 or aawilliams@pvamu.edu.

TRANSLATOR AND INTERPRETER REQUIREMENTS

Understanding competencies

Professional translators and interpreters have a specialized skill set. While skill sets and specializations of translators and interpreters vary, industry standards frame the qualifications and credentials of professionals. CEP only contracts professional translators and interpreters who can demonstrate appropriate and relevant qualifications and credentials.

Industry standards for qualifications and credentials

CEP 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 a combination of the following:

- 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

Types of Service Providers

This section details the types of language translators and interpreters available as well as specifies types acceptable providers to use for CEP business. To ensure quality standards and fulfillment of legal obligations, CEP employees should only utilize approved services providers provided by the program coordinator.

Qualified service providers

Professional translation and interpretation require 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 can provide services that reflect high standards of professional quality.

A professional interpreter should have a solid understanding of the scope of work as well as any additional ethical considerations for service delivery. Additionally, they should possess a solid professional experience as well as speak to tools, practices, processes, and credentials that support the quality of their work.

Alternative service providers

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 program coordinator prior to the event. Volunteers should have sufficient proficiency in the source and target language and knowledge in both languages of any specialized vocabulary or phraseology. Additionally, they must complete a standards and expectations training offered by CEP to provide translation and interpretation services. Background checks and volunteer forms may be required.

Bilingual staff and employees as translators and interpreters

In some instances, it may be appropriate to utilize bilingual CEP employees and staff for translation and interpretation services. It should not be assumed that bilingual persons are also qualified to provide professional translation and interpretation services. The employee should have sufficient proficiency in the source and target language and knowledge in both languages of any specialized vocabulary or phraseology. Additionally, they must complete a standards and expectations training offered by CEP to provide translation and interpretation services. Unless it is specifically stated as a part of their position duties, bilingual employees and staff have no obligation to translate documents or serve as an interpreter for their colleagues or office.

Prohibited service providers

Minors as interpreters

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.

Web-based translators

Web-based translators are not a suitable alternative to sourcing professional translators and/or working with the program coordinator. Using non-certified web-based translators to create materials in a multilingual format creates potentially unreliable, unethical, and inconsistent results. Web-based translators that are not CEP certified, such as Google Translate and Translate.com, are not to be used for translating organizational materials.

ORGANIZATION EMPLOYEES' ROLES AND RESPONSIBILITIES

Responsibility of CEP Employees

At the first point of contact with a person reasonably believed to be an LEP Person, CEP employees should determine the person's primary language and obtain appropriate language support services, if needed. The interaction must be documented. Employees and staff may seek assistance from their supervisor or the program coordinator.

Employees must keep an up-to-date and accurate record of LEP direct contacts encountered and services provided even if they do not request language support services from the program coordinator. At a minimum, the record must include the date of service, service provided (e.g. translation or interpretation), languages of the group(s) or individual(s) (e.g. Spanish, Chinese), and number of LEP persons who received services. It is suggested a copy or other proof of service is kept on file.

Responsibilities of CEP Bilingual Employees

Bilingual employees may choose to translate documents or serve as an interpreter for their own programming even if these duties are not stated in their job description, but they should consult with the program coordinator prior to the event. These employees should have sufficient proficiency in the source and target language and knowledge in both languages of any specialized vocabulary or phraseology. A proficiency test may be requested to confirm language proficiencies. Additionally, they must complete a standards and expectations training offered by CEP to provide translation and interpretation services.

Responsibilities of the Limited English Proficiency Program Coordinator

Referred to throughout this document as “program coordinator”, the limited English proficiency program coordinator is responsible for ensuring CEP compliance with federal standards, facilitating translation and interpretation service requests, and supporting employee efforts to engage diverse audiences.

The program coordinator works directly with employees requesting language access support and assists during multiple points of project/event planning and execution process including, but not limited to:

- identifying necessary language accommodations for creating meaningful access and prioritizing language access needs
- identifying dynamic factors that influence the target LEP population’s language needs (e.g., dialects, regional varieties, etc.)
- highlighting the sociocultural attributes that may be relevant to the target population
- sourcing professional translators and interpreters
- obtaining cost estimates for the project and coordinating invoicing and payments
- developing a timeline for language access planning
- evaluating the quality of translation and interpretation services

Responsibilities of CEP Extension Agents

Collect population data

County extension agents are responsible for identifying the LEP population in the county where they provide services. This includes the estimated number or percentage of LEP individuals, the languages spoken, and the countries of origin. This information should be reviewed annually. If there are indications of a change in population before annual review, county agents must research the possible changes and records should be updated accordingly. The following list contains resources that may assist in collecting accurate LEP population data:

- Mapping tool www.lep.gov/maps
- U.S. Census language center <http://www.census.gov/topics/population/language-use/data.html>
- County websites and offices
- State websites and offices

Request and provide language access services

It is the responsibility of the county agents to request language access services for their audiences. It is imperative that agents plan for language access needs and request assistance in a timely manner. An LSR form may be submitted to facilitate this process.

Record Keeping

County extension agents must keep an up-to-date and accurate record of LEP direct contacts encountered and services provided in PEARS even if they do not request language support services from the program coordinator. It is suggested a copy or other proof of service is kept on file.

Continuous Education

Agents should be knowledgeable about LEP populations in their counties. They are encouraged to utilize resources provided by CEP and seek other resources to increase their knowledge and awareness of the LEP community.

CONTACT

Please direct all questions related to CEP standards for language access services to:

Ashia Williams

Program Coordinator II, LEP

Cooperative Extension Program

Prairie View A&M University

936-261-5166 | aawilliams@pvamu.edu

COMPLAINTS

Prairie View A&M University Cooperative Extension Program is committed to nondiscrimination and takes complaints related to civil rights, affirmative action, equal employment opportunity, and sexual harassment very seriously.

Who can file a discrimination complaint?

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.

Filing a complaint: PVAMU CEP process for filing a complaint is available at <http://www.pvamu.edu/hr/office-of-equal-opportunity-diversity/complaints/>

Please direct all questions related to discrimination complaints to:

Director of Equal Opportunity & Diversity
Prairie View A&M University – Human Resources
Harrington Science Building, Suite 109
P.O. Box 519, Mail Stop 1337
Prairie View, TX 77446
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