



TOWN OF CHAPEL HILL

LANGUAGE ACCESS PLAN

Approved by Chapel Hill Town Council
November, 13 2019

Table of Contents

Introduction	3
Why Does Chapel Hill Need Language Access?	3
Purpose	3
Demographics	4
Definitions	5
Developing the Language Access Plan	6
Needs Assessment: Completing a Four-Factor Analysis	6
Stakeholder Engagement	9
Approaches to Providing Language Assistance	10
Language Access Policies and Procedures	12
Policies for Notice of Availability of Language Assistance Services	12
Policies for Interpretation & Translation	13
Procedures for Determining the Need for Language Assistance	14
Procedures for Scheduling Interpretation & Translation	15
Procedures for Training	16
Carrying Out the Language Access Plan	16
Monitoring and Updating the LAP	16
Resolving Complaints about Language-Based Services	17
References	18
Appendix A: Legal Information	19
Appendix B: Additional Demographics	21
Appendix C: Town Departmental Language Access Survey	26
Appendix D: Vital Documents	35
Appendix E: Language Access Plans	36

Introduction

Why Does Chapel Hill Need Language Access?

The Town's mission is to create a community where people thrive.¹ As part of that commitment, the Town Council established a [goal](#)² to *Create a Place for Everyone* and build a *Vibrant and Inclusive Community*. To achieve this goal, the Town must continue to strengthen connections and partnerships with historically disengaged and marginalized populations and reduce barriers to participation. One crucial step towards this end is ensuring meaningful access to Town information and services, regardless of language.

The Town of Chapel Hill is increasingly aware of the communication gap with limited English proficient (LEP) residents. Through extensive community engagement during the Town's [Building Integrated Communities](#)³ Initiative, immigrant and refugee residents identified language access as a key strategy for the Town to more effectively reach them. Communications that are accessible to the whole community will help Chapel Hill be more inclusive and welcoming to all.

In addition to advancing the Town's goal, language access is required for legal compliance with federal regulations, which require organizations that receive funding from the Federal Government to take reasonable steps to ensure meaningful access to services for LEP individuals.

These regulations ensure that no person – on the ground of race, color, or national origin – is excluded from, denied benefits of, or subjected to discrimination under any services receiving federal financial assistance. The regulations include, but are not limited to, [Title VI of the Civil Rights Act of 1964](#)⁴, the [1987 Civil Rights Restoration Act](#)⁵, and [Executive Order 13166](#)⁶. Refer to Appendix A for additional details on legal compliance and requirements.

Purpose

The Town of Chapel Hill's Language Access Plan (LAP) is an action-oriented implementation plan to guide the Town towards language justice. More specifically, the LAP establishes policies and procedures to ensure access to Town resources and services for LEP residents. These policies and procedures will apply to all Town programs and services, unless otherwise indicated. Through consistent monitoring and updating of this LAP, the Town will better serve and understand the needs of residents and improve the accessibility of services and resources. Further, the Town will ensure it moves towards policies and procedures supporting the right of all residents to communicate with the Town in the language they prefer.

¹ www.townofchapelhill.org/town-hall/departments-services/human-resource-development/mission-and-values

² www.townofchapelhill.org/town-hall/mayor-and-council/town-strategic-goals-objectives

³ www.townofchapelhill.org/bic

⁴ www.justice.gov/crt/fcs/TitleVI-Overview

⁵ www.congress.gov/bill/100th-congress/senate-bill/557

⁶ www.justice.gov/crt/executive-order-13166

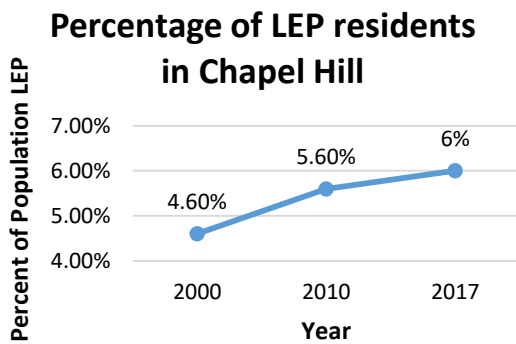
Demographics

Chapel Hill is diverse⁷: Chapel Hill has experienced an influx of immigrants and refugees in recent years. From 2000 to 2017, the percentage of Chapel Hill residents born outside of the U.S. steadily increased from 11.2% to 15.7%, an increase of over 40%. Chapel Hill has a variety of living, learning, and working opportunities that contribute to the Town’s increasing international diversity.

Chapel Hill residents are from all over the world. Here are just a few places:



Chapel Hill residents come from many countries across the world⁷: In 2017, Chapel Hill’s population of 59,234 included 9,307 (16%) people born in over 78 countries outside of the U.S.⁷ The top five countries of origin are China, India, South Korea, Mexico, and the United Kingdom. In addition, since 2005, 1,177 refugees have arrived in Orange County, primarily from Burma/Myanmar, Cameroon, and the Democratic Republic of the Congo.



Chapel Hill residents speak languages other than English⁷: Among Chapel Hill residents ages 5 and over, 20% (11,611) report speaking languages other than English. In Chapel Hill, 6% (3,465) of residents report their English-speaking ability as “less than very well”. This number has gradually increased over time from 4.6% in 2000 and 5.6% in 2010. For this LAP, we identify LEP individuals as those who describe their English-speaking ability as “less than very well”.

More LEP residents are foreign-born⁷: Among Chapel Hill’s foreign-born population, nearly 34% reported having “less than very well” English-speaking ability, compared to only 0.8% of those who are native of the United States. The top non-English languages spoken by residents of Chapel Hill are Spanish, Mandarin Chinese, Korean, and other Asian languages, including Burmese and Karen.

⁷ U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

Definitions

Interpretation: The process of adapting oral speech from one language to another, either simultaneously or delayed (consecutive), without loss or change in meaning.

Language Access Plan (LAP): A set of policies and procedures established to provide the most effective services for those with limited English proficiency.

Limited English Proficiency (LEP): Describing persons with limited ability to communicate (e.g. speak, read, write, or understand) effectively in English. When reviewing data, we will follow the U.S. Census Bureau classification for LEP individuals.⁸ According to the Bureau, an LEP individual is anyone above the age of 5 who reported speaking English less than “very well”. The Bureau’s classifications are “very well”, “well”, “not well”, and “not at all”.

Language Justice: The right for all people to communicate in the language they prefer.

Meaningful Access: Ability to use resources without significant restriction from language barriers.

Primary Language: The non-English language groups most commonly used in Chapel Hill. For this current Plan, the languages are Burmese, Karen, Mandarin Chinese, and Spanish.

Translation: The process of adapting written text in one language to other language(s), with consistent and accurate meanings.

Vital Document: Document that is necessary or significant towards using or receiving any activity, service, program, or other resource offered by the Town.

⁸ <https://www.lep.gov/>

Developing the Language Access Plan

In developing the LAP, Chapel Hill Town staff completed a needs assessment, gathered information from stakeholder groups, and reviewed language assistance services. Our process for developing the LAP is outlined below.

Needs Assessment: Completing a Four-Factor Analysis

As a starting point to creating a LAP, the U.S. Department of Justice recommends completing a [Four-Factor Analysis](#).⁹ The Four-Factor Analysis helps the Town plan and provide language access based on:

1. Number or proportion of LEP individuals in the community
2. Frequency with which LEP individuals come in contact with Town services
3. Nature and importance of the services
4. Resources available and costs

These factors create a picture of the needs in the community. The greater the number of LEP individuals, the greater the frequency of contact with the Town, and the greater the importance of the service, the more likely language services will be needed. Findings can change over time based on changing community demographics.

Factor 1: Number or proportion of LEP individuals in the community

Data for this analysis was gathered from the U.S. Census Bureau’s American Community Survey.⁷

6% of Chapel Hill residents are defined as LEP individuals: LEP residents are those who reported speaking English less than “very well” in the U.S Census Bureau’s American Community Survey (See Table 1). The U.S. Department of Housing and Urban Development (HUD) provides guidance for providing accommodations for written materials to language groups (see Appendix A).¹⁰ For certain Town services, such as Public Housing, we surpass HUD’s threshold (5%), highlighting the importance of implementing this LAP.

Table 1. Language Spoken at home by Chapel Hill residents

Languages	Population Estimate	Percent
Total Population	57,402	--
Speak only English	45,791	79.8%
Speak languages other than English	11,611	20.2%
Speak English less than “very well” (LEP)	3,465	6.0%

Source: ACS 2017 (5 Year Estimates), Table B16005

⁹ https://ojp.gov/fedregister/fr_2002-06-18.pdf

¹⁰ https://www.hud.gov/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q20

According to the 2017 American Community Survey (ACS), residents speaking Asian and Pacific Islander languages make up Chapel Hill’s largest LEP group (Table 2). The U.S. Census groups several languages into subgroups outlined in Table 2. Examples of Asian and Pacific Islander languages include Chinese, Vietnamese, Hmong, Korean, Burmese, and Karen. Examples of “other” Indo-European languages spoken (besides Spanish) include French, Haitian, Portuguese, Hindi, Russian, and German.

Table 2. Language Spoken at home by Chapel Hill residents

Language and English speaking ability	Population Estimate	Percent
Speak Spanish	3,079	5.36%
Speak English “very well”	2,253	3.92%
(LEP) Speak English less than “very well”	826	1.44%
Speak other Indo-European languages	3,202	5.58%
Speak English “very well”	2,741	4.78%
(LEP) Speak English less than “very well”	461	0.80%
Speak Asian and Pacific Islander languages	4,934	8.60%
Speak English “very well”	2,775	4.83%
(LEP) Speak English less than “very well”	2,159	3.76%
Speak other languages	396	0.69%
Speak English “very well”	377	0.66%
(LEP) Speak English less than “very well”	19	0.03%

Source: ACS 2017 (5 Year Estimates), Table B16005

*Examples of **Asian and Pacific Island languages** include: Chinese, Vietnamese, Hmong, Korean, Iloko, Burmese, and Chuukese.*

*Examples of **“other” Indo-European languages spoken (besides Spanish)** include: French, Haitian, Gujarati, Portuguese, Polish, Hindi, Russian, German, Urdu, Bengali, Nepali, and Persian.*

For the purposes of this LAP, we also looked at data to identify which specific languages are most prominent. Chapel Hill residents’ top languages are Spanish, Chinese, Korean, Other Asian Languages, and French (see Table 3, next page). From our community partners and interactions with residents through Town services and programs, we know that the Other Asian Languages most often encountered in Chapel Hill are Burmese and Karen - the common Asian languages spoken by refugee residents in the community.

Table 3. Top 5 of non-English languages and percent of LEP population in Chapel Hill

Non-English Language	Estimated Number of Speakers	Percent of Total Population	Percent LEP of Total Population
Spanish or Spanish Creole	3,206	5.63%	1.92%
Chinese	2,727	4.79%	2.15%
Korean	987	1.73%	1.06%
Other Asian languages	852	1.50%	0.61%
French (incl. Patois, Cajun)	613	1.08%	0.14%

Source: ACS 2015 (5 Year Estimates), Table B16001

Refugee arrival data further informs our understanding of the most common languages spoken in Chapel Hill. Since 2005, 1,177 refugees have arrived in Orange County (See Table 4). Burma (Myanmar) is one of the most common countries of arrival, with many of those residents speaking Burmese or Karen.

Table 4. Total number of refugee arrivals in Orange County by country from 2005-2019

Country	# of Refugee Arrivals
Burma	999
Democratic Republic of the Congo (DRC)	86
Syria	34
Iran	13
Iraq	12
Laos	8
Bhutan	5
El Salvador	5
Colombia	4
Cuba	4
Nepal	4
Cameroon	1
Haiti	1
Russia	1
Total	1,177

Data provided by the Orange County Health Department in September, 2019.

*NOTE: Unable to measure in and out migration. These data reflect direct arrivals to Orange County, NC.

Factor 2: Frequency of Contact

Several Town departments, such as Public Housing, Housing and Community, Police, Fire, and Parks and Recreation have frequent contact with LEP residents. For example, approximately 35% of public housing residents have a preferred language other than English. The largest non-English preferred language is Burmese, consisting of over 17% of the 283 total public housing households (See Table 5 on next page). Police and Fire regularly interact with LEP residents through routine traffic stops, emergency response calls, etc. where communication is critical. Housing and Community and Parks and Recreation also have frequent contact with LEP

residents through their various program offerings. To learn more about Town services and language access, refer to Appendix C for a departmental survey report.

Table 5. Chapel Hill Public Housing Households Preferred Language (July, 2019)

Language	Number	% of Total
English	183	64.7%
Burmese	50	17.6%
Karen	27	9.5%
Rohingya	8	2.8%
Spanish	7	2.5%
Arabic	3	1.1%
Chin	2	0.7%
French	1	0.4%
Mandarin	1	0.4%
Swahili	1	0.4%

Source: Chapel Hill Public Housing

Factor 3: Nature and importance of the services

The Town of Chapel Hill offers many services and programs to residents, such as public safety services, ownership and management of public housing, management of a public transit system and infrastructure where communication with residents is critical to effective delivery of services. The nature of these services are important to an individual’s day-to-day quality of life. By improving language access for Town services we can improve the quality of life of our residents.

Factor 4: Resources Available and Costs

The Town will continually assess the resources available for interpretation and translation. Assessment includes identifying appropriate documents for translation, assistance in implementing the LAP, developing contracts with local language service organizations, and more. For professional translation, the cost is per-word and rates can vary by language, turnaround times, and specialized content. For a drafted LAP budget, refer to the Appendix.

Stakeholder Engagement

Through the Building Integrated Communities (BIC) Initiative, Chapel Hill engaged with over 250+ immigrant and refugee residents beginning in 2018 to understand their experiences and develop recommendations for the Town Council to consider that support their integration, wellbeing, and leadership development. The BIC team gathered data from community meetings with 160 immigrant and refugee residents, the U.S. Census, analysis of 25+ oral histories, 13 interviews with organizations and businesses that work with immigrant and refugee residents, and surveys of 74 refugees.

Town of Chapel Hill Language Access Plan

One of the key recommendations that the Town heard was to improve accessibility to Town communications. A first step in this process is creating a LAP. Resident recommendations Town staff considered when developing the LAP included:

- Translate Town resources such as bus schedules, public housing applications and materials, public meeting materials, permits, and the Town website
- Provide interpretation for public meetings
- Hire more bilingual staff

Staff also surveyed all Town departments to learn about their experiences engaging with LEP residents and language access needs. See Appendix C for the survey report.

The BIC Implementation Team, comprised of immigrant and refugee residents, community organization representatives, and Town staff, provided significant input into the policies and procedures of the LAP and will continue to play a central role in evaluating the plan's effectiveness should we move forward with implementation.

Approaches to Providing Language Assistance

There are a variety of established language assistance approaches that the Town can use to meet the language needs of the community.¹¹ The most common approaches include:

- In-person interpretation
- Remote interpretation (e.g. telephonic, video)
- Translation of written materials

Table 6 (next page) details the differences between these approaches, including the benefits and drawbacks.^{11,12} This information has informed the Town's thinking about the recommended language assistance services outlined in the Language Access Plan.

¹¹ <https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/Lessons-from-the-Field-508.pdf>

¹² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4059012/>

Table 6: Approaches to Language Assistance Services

In-person interpretation		
<i>Pros</i>	<i>Cons</i>	<i>Preferred Application</i>
<ul style="list-style-type: none"> ▪ In-person interpreters can take into account nonverbal cues (body language, facial expressions, etc.). ▪ In-person interpreters can build rapport with community members and staff members. ▪ Can be very helpful in all situations, especially long meetings, instances where complex or sensitive information will be discussed, and for group settings. 	<ul style="list-style-type: none"> ▪ Requires advance notice to schedule an interpreter. ▪ Interpreters may not always be available in the language requested and at the time needed. ▪ Interpreter training programs can vary in certification standards. ▪ More costly than other language assistance alternatives (depending on need). ▪ When contracting with an outside organization, interpreter training programs can vary in quality. ▪ If using staff, need them to have time and flexibility to serve in this role. 	<ul style="list-style-type: none"> ▪ Planned meetings and appointments ▪ Large scale public meetings
Remote interpretation (telephonic, video, etc.)		
<i>Pros</i>	<i>Cons</i>	<i>Preferred Application</i>
<ul style="list-style-type: none"> ▪ Allows an interpreter to be available at all times ▪ Convenient, and sometimes necessary, for immediate or emergency needs. ▪ Helpful when working with less common languages because a wide variety of languages are often available. ▪ Cost effective for short conversations. 	<ul style="list-style-type: none"> ▪ Less personal than in-person interpretation ▪ Interpreter cannot refer to nonverbal cues and may miss the full context of the interaction, may not always be briefed on the circumstance. ▪ Can be helpful for sharing general administrative or informational items, but other more complex/sensitive items may benefit more from an in-person interpreter. 	<ul style="list-style-type: none"> ▪ Unplanned meetings or interactions when an in-person interpreter is not available
Translation of Written Materials		
<i>Pros</i>	<i>Cons</i>	<i>Preferred Application</i>
<ul style="list-style-type: none"> ▪ Written translations can reach a large audience. ▪ Improves access to documents and information in peoples' preferred language. ▪ Allows for content to be translated and saved for future use. 	<ul style="list-style-type: none"> ▪ The document may still be confusing to the reader (e.g. original content does not translate well in another language, topic not easy to understand, etc.). ▪ Can be cost prohibitive, as typically translation charges are calculated per word in the document. ▪ May not be the most effective approach for populations with low literacy. 	<ul style="list-style-type: none"> ▪ Written materials, including vital documents and emergency messages (see Appendix D)

Language Access Policies and Procedures

This section outlines key policies and procedures that the Town of Chapel Hill will implement to improve language access for LEP residents to Town programs, processes, and services. These policies and procedures are based on the recommended policy directives put forth in the [Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs](#)¹³, a document prepared by the U.S. Department of Justice, Civil Rights Division. Additionally, the four-factor analysis described above informed our approach to the policies and procedures, as well as a review of model LAPs from local governments across the nation (See Appendix).

Policies

Policies for Notice of Availability of Language Assistance Services

The Town will notify LEP individuals of their right to language assistance services.

- Town departments and staff will let LEP individuals know they have the right to language services at no charge to the resident requesting assistance. Notices will include information about available language services.
- Notices will be translated into the Town's identified primary languages.

Language assistance notices will be provided in a variety of ways, including, but not limited to:

- Flyers or posters in appropriate Town reception areas and other points of entry at facilities.
- Notice of free language services on the Town website.
- Standard translated notice in Town outreach documents for public meetings.
- Using a telephone voicemail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English.
- Airing notices on non-English language radio and television stations.
- Working with cultural community organizations and other stakeholders to inform Chapel Hill residents of their right to language access services.

What are the Town's primary languages?

The Town's primary languages are Burmese, Mandarin Chinese, Karen, and Spanish. From the American Community Survey data, Town service data, and information gathered through Building Integrated Communities community engagement, we have identified these are the most common language groups in Chapel Hill.

The U.S. Department of Health and Human Services has translated notices that the Town will use as templates found at <https://www.hhs.gov/civil-rights/for-individuals/section-1557/translated-resources/index.html>

¹³ https://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

Policies for Interpretation & Translation

Interpretation and translation will be offered free of charge.

- The Town will provide interpreters at no charge to the resident requesting interpretation for Town services or programs.
- The Town will provide translation of vital documents and emergency communications at no charge to the resident requesting translation.
- The Town will make its best effort to ensure timely access to interpretation and translation services.

What is the difference between interpretation and translation?

The difference is in how messages are delivered.

An **interpreter** is trained to convert **oral messages** from one language to another. They are often used for meetings.

A **translator** is trained to convert **written text** from one language to another. They help with converting text in documents to another language.

The Town will translate vital documents and emergency communications into the Town's identified primary languages.

- Vital documents are those that are necessary to use or receive Town services or programs. The Town will create and maintain an inventory of vital documents.
- The Town will distribute key messages in the identified primary languages during emergency situations, such as natural disasters, wide-spread utility service outages, etc.
- When possible, the Town will use cost-effective language services, such as Google Translate, to translate other Town communications and documents.

Town departments will be responsible for securing interpretation and translation services. Assistance in securing services will be provided by Housing & Community staff.

- Interpretation and translation requests should be submitted as far in advance as possible to allow adequate time for language assistance services to be arranged.
- If departments need assistance setting up language services, Housing & Community staff can provide guidance.

On-demand interpretation will be available for public meetings, small group, and one-on-one interactions.

- LEP individuals may request interpretation for public meetings, small group meetings, or one-on-one interactions with Town staff. Such requests should be made at least 48 hours in advance to ensure adequate time to make arrangements for interpreters.
- Public meeting notices will include statements in the Town's primary languages announcing on-demand interpretation for public meetings.

The Town will use competent, trained, and culturally sensitive interpreters and translators.

- For the provision of language services, the Town will use professional interpreters and translators who abide by a code of ethics and professional practice standards and are trained in their field.
- The Town commits to *not* using untrained interpreters and translators to assist with language services, such as residents' family members or friends or persons under the age of 18.
- Interpretation and translated materials will be randomly evaluated for accuracy.

The Town will support the training of bilingual staff as interpreters and translators and offer a pay incentive to those who satisfy criteria for serving as an interpreter or translator for the Town.

- The Town will offer language service training and assessments to multi-lingual staff who speak the Town’s primary languages and are willing to use their language skills as an interpreter or translator for the Town on an as needed basis.
- Employees who successfully complete the required training and assessment to serve as an interpreter or translator for the Town on an as-needed basis will receive an annual pay incentive.
- The pay incentive will be equivalent to that currently offered in the Chapel Hill Police Department (2.5% per language annually).
- The Town will regularly evaluate the need for dedicated staff to serve as interpreters and translators and coordinate LAP implementation.

Procedures

Procedures for Determining the Need for Language Assistance

The procedures detailed below provide a big picture summary for how the LAP policies will be implemented. The Town will jointly design detailed procedural steps for accessing and using language with LEP community members.

At point of first contact with LEP individual

- Staff will make reasonable efforts to assess the need of language assistance. Staff can determine language assistance needs in several ways, including:
 - Self-identification by the LEP individual
 - Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services
 - Using “I Speak” language identification cards or posters
- Staff should notify the individual of the right to an interpreter at no charge.

At public meetings

- Free, demand-based interpretation for public meetings will be advertised in notices prior to the meeting. LEP individuals will be asked to give at least 48 hour notice to allow adequate time for scheduling interpreters for the requested meeting.
 - If a LEP individual arrives to a public meeting without providing notice to the Town, staff will make their best effort to provide access to language assistance. However, due to limited notice, service may not be available in such cases.
 - If a Town department is planning a community meeting where they expect community members from a LEP population to attend, staff will secure appropriate language services in advance of the meeting. For these meetings, staff should advertise availability of language services in multilingual outreach materials.
- If the language requested is not available through a local language service, Town staff will work with the requesting individual to determine what options are available.

- To request interpretation for a public meeting, residents should call the Town at 919-968-2743 or email (housingandcommunity@townofchapelhill.org).

For one-on-one and small group interactions

- The Town requests that LEP individuals give at least 48 hour notice to allow adequate time for scheduling interpreters for the requested meeting. If the language requested is not available through a local language service, Town staff will use a phone-based language line.
- If a LEP resident does not provide notice at least 48 hour notice, Town staff will use a phone-based language line.
- The Chapel Hill Police and Fire departments will continue to provide interpretation services through a phone-based language line Telelanguage (<https://telelanguage.com>).

Procedures for Scheduling Interpretation & Translation

How to request interpretation or translation services

- Housing & Community staff will assist departments in scheduling interpretation & translation services as needed.
- The Town will use a variety of interpretation and translation services, including:
 - Professional interpretation and translation through contract services with local language service organizations
 - Professional telephone interpreters
 - Trained Town staff
- Town staff should allow as much time as possible in advance of needed language services to secure interpretation and translation services.

Prioritization for type of interpretation service

- The Town will aim to use the following order of priority when scheduling interpreters:
 - First, use trained, multilingual Town staff
 - If Town staff are not available, look for an in-person, contracted interpreter
 - Lastly, if neither of the above are available, use a telephone interpreter

Identifying the type of interpretation service needed

- There are two types of interpretation services – simultaneous and consecutive. The format of interpreting services is dependent on the context.
 - Consecutive language interpretation: Suitable for one-on-one or small group meetings in which the speakers will pause after each sentence to allow the interpreter to communicate their statement.
 - Simultaneous language interpretation: Suitable for large group meetings in which the speaker does not pause for the interpreter. Typically, simultaneous interpretation is provided through interpretation equipment (radio headsets).

Procedures for Training

Town-wide Staff Training

- The Town will provide periodic training for all Town staff to familiarize departments with the LAP policies and procedures.
- This training's offerings may include, but not be limited to, topics such as:
 - Language Access Plan Overview
 - Skill building on how to identify individual's primary language, how to respond to LEP callers, how to obtain language assistance services, etc.
- All new employees will receive the language access and assistance training as part of orientation.
- Language assistance training will be updated with the Plan, regarding changes in demographic and community data.

Additional Staff Training

- Additional training may be provided for staff and employees who:
 - have frequent interaction with residents or LEP individuals
 - are multilingual staff and provide translation or interpretation services as part of their job
- These trainings may be more focused on topics that will assist staff in effectively interacting with LEP individuals.

Carrying Out the Language Access Plan

Monitoring and Updating the LAP

The Town's LAP will be reviewed annually to assess its relevance and effectiveness. Staff's annual monitoring of the LAP will include review of:

- Data related to the number of residents who are LEP or speakers of languages other than English
- Reporting on the Town's language assistance services, including the usage of language services and tracking of language assistance requests
- Reporting on Town staff capacity to serve LEP residents including the language skills of Town employees and LAP training of Town employees
- Feedback from residents who are LEP and speakers of languages other than English, including community-based organizations and groups, regarding effectiveness of the LAP and language services provided by the Town
- Review of the Town's language contract with local vendors
- Review of Town engagement strategies and communication pathways advertising language access and assistance

Based on this review, Town staff will update the LAP, as needed.

Resolving Complaints about Language-Based Services

The Town of Chapel Hill Title VI complaint process covers complaints filed by an individual or group of individuals under Title VI of the Civil Rights Act of 1964. Title VI ensures that no person – on the ground of race, color, or national origin – be excluded from, denied benefits of, or be subjected to discrimination under any services receiving federal financial assistance.

Any person who believes they have been mistreated by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the Town of Chapel Hill. The person or organization filing the complaint does not need to be the victim, but may complain on behalf of another person or group.

The preferred method to file a complaint is in writing using the Title VI Complaint Form. Complaints may be sent to the Office for Housing and Community. Complaints must be filed within 180 days following the alleged discrimination occurrence. The Town will follow the established complaint procedures for Title VI and will document actions taken to resolve each complaint in a timely manner.

References

1. Mission and Values. (2019). [Webpage]. Retrieved from: www.townofchapelhill.org/town-hall/departments-services/human-resource-development/mission-and-values
2. Town Strategic Goals & Objectives (FY 2020 – 2022). (2019). [Webpage] Retrieved from: www.townofchapelhill.org/town-hall/mayor-and-council/town-strategic-goals-objectives
3. Building Integrated Communities (2019). [Webpage]. Retrieved from: www.townofchapelhill.org/town-hall/departments-services/housing-and-community/community-programs/chapel-hill-bic-project-proyecto-chapel-hill-bic-3532
4. Title VI of the Civil Rights Act of 1964 U.S.C 2000D ET Seq. Retrieved from: www.justice.gov/crt/fcs/TitleVI-Overview
5. S.557 Civil Rights Restoration Act of 1987. Retrieved from: www.congress.gov/bill/100th-congress/senate-bill/557
6. Executive Order 13166. Retrieved from: www.justice.gov/crt/executive-order-13166
7. U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates. www.data.census.gov
8. Limited English Proficiency (LEP). [Webpage]. Retrieved from: <https://www.lep.gov/>
9. Department of Justice Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons. Federal Register. Vol 67, No 117. Retrieved from: https://ojp.gov/fedregister/fr_2002-06-18.pdf
10. Limited English Proficiency (LEP) Frequently Asked Questions. [Webpage]. Retrieved from: https://www.hud.gov/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q20
11. Providing Language Services to Diverse Populations: Lessons from the Field. *Centers for Medicare and Medicaid Services*. Retrieved from: <https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/Lessons-from-the-Field-508.pdf>
12. Price, E. L., Pérez-Stable, E. J., Nickleach, D., López, M., & Karliner, L. S. (2012). Interpreter perspectives of in-person, telephonic, and videoconferencing medical interpretation in clinical encounters. *Patient education and counseling*, 87(2), 226–232. doi:10.1016/j.pec.2011.08.006 Retrieved from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4059012/>
13. Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs. *U.S. Department of Justice*. (2011). Retrieved from: https://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

Appendix A: Legal Information

[Title VI of the Civil Rights Act of 1964](#)⁴

- [Title VI of the Civil Rights Act of 1964 \(42 U.S.C Section 2000d\) states:](#)

“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.”

- Federal financial assistance means more than just money. It includes any aid that enhances the ability to improve or expand allocation of a recipient’s own resources. This can include: grants and loans, tax-exempt bonds, loan of personnel, property, tax incentives and tax-exempt status, technical assistance and other similar types of assistance, training of employees that permits better use of the employer, etc.
- Federally assisted recipients should make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: conduct the four-factor analysis (described in a subsequent section), develop a Language Access Plan (LAP), and provide appropriate language assistance.
- The goal of Title VI is voluntary compliance. Recipients must be given opportunity to voluntarily comply when violations are found. But if this cannot be achieved federal financial assistance may be withdrawn.

[1987 Civil Rights Restoration Act](#)⁵

- This Act expanded the definition of “programs and activities” to include all programs and activities of federal aid recipients, sub-recipients or contractors, whether such programs and activities are federally assisted or not.

[Executive Order 13166](#)⁶

- This Order, signed in 2000, better enforces and implements Title VI of the Civil Rights Act of 1964. It requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

[Continued on next page]

Town of Chapel Hill Language Access Plan

[HUD Safe Harbor Guidelines](#)¹⁰

- HUD has adopted "safe harbor" guidelines that provides starting point numbers for recipients to consider when translating written materials. The Four-Factor Analysis does not provide benchmark numbers, so this guidance can be helpful for some organizations in setting priorities. It is not required to follow these guidelines.
- To note, the HUD Safe Harbor Guidelines make a distinction between the eligible population (e.g. all of Chapel Hill) and the beneficiaries (e.g. occupants of, or applicants to public housing for instance). Failure to provide written translations under this guidance does not mean the recipient is in noncompliance.

The table below sets forth HUD's safe harbors for written translations.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

Appendix B: Additional Demographics

This appendix provides additional data on Chapel Hill residents, specifically data related to country of origin and language spoken at home.

To find even more information about the Town’s immigrant and refugee communities, as well as how the Town is supporting these communities, refer to the Town’s Building Integrated Communities Reports.

- [BIC Community Assessment Report](#)
- [BIC Action Plan](#)

You can find these at www.townofchapelhill.org/bic



COUNTRY OF ORIGIN

Chapel Hill residents come from all over the world.

Table 1. Top 10 countries of origin for Chapel Hill residents born outside the U.S.

Country	Population Estimate	Percentage
China, excluding Hong Kong & Taiwan	2,109	22.7%
India	875	9.4%
Korea	678	7.3%
Mexico	612	6.6%
United Kingdom	409	4.4%
Canada	296	3.2%
Argentina	220	2.4%
Taiwan	216	2.3%
Germany	215	2.3%
Philippines	200	2.1%

Source: ACS 2017 (5-year Estimates), Table B05006

Table 2. Refugee Direct Arrivals in Orange County, Trends 2005-2019

Fiscal Year (July 1- June 30)	Refugee Arrivals	Countries of Origin
2005-2006	19	Burma, Cuba, Iran
2006-2007	55	Burma
2007-2008	255	Burma, Iran, Colombia
2008-2009	194	Burma, Bhutan, Iran, Iraq
2009-2010	57	Burma, DRC (Congo), Haiti
2010-2011	86	Burma, Laos
2011-2012	53	Burma
2012-2013	83	Burma, DRC, Iraq
2013-2014	80	Burma, Iran, Cameroon
2014-2015	54	Burma, Iraq, Iran, DRC
2015-2016	83	DRC, Burma, Iraq, Russia
2016-2017	102	Burma, Syria, DRC, El Salvador
2017-2018	22	Burma, DRC, Nepal
2018-2019 (as of Sept 2019)	34	Burma, DRC, Syria, El Salvador

Source: Orange County Health Department

LANGUAGE SPOKEN AT HOME

The number of Chapel Hill residents speaking a language other than English at home has increased over time. The number of LEP residents has also increased.

Table 3. Language spoken at home other than English for Chapel Hill residents age 5+

Year	Population 5 years and over	# who speak a language other than English at home	% of population age 5+	# who are LEP	% of population who are LEP
2000	47,226	6,808	14.4%	2,163	4.6%
2010	52,892	9,229	17.4%	2,957	5.6%
2017	57,402	11,611	20.2%	3,465	6.0%

Sources: U.S. Census Bureau (2000 Census SF3, Table DP-2); ACS 2010 (5-year Estimates), DP02 ACS 2017 (5-year Estimates), DP02

REMINDER: Limited English Proficiency, or LEP, describes persons with limited ability to communicate (e.g. speak, read, write, or understand) effectively in English. When reviewing data, the U.S. Census bureau classifies LEP individuals as anyone above the age of 5 who reported speaking English less than 'very well.' The Bureau's classifications are 'very well', 'well', 'not well', and 'not at all.'

Table 4. Language spoken at home and ability to speak English for Chapel Hill residents age 5+

Native Residents			Foreign Born Residents		
	Estimate	Percent		Estimate	Percent
Total Population (age 5+)	48,249	84.1%	Total Population (age 5+)	9,153	16.0%
Speak Only English	43,905	76.5%	Speak Only English	1,886	3.3%
Speak Spanish	1,802	3.1%	Speak Spanish	1,277	2.2%
Speak English "very well"	1,683	2.93%	Speak English "very well"	570	1.0%
Speak English less than "very well"	119	0.2%	Speak English less than "very well"	707	1.2%
Speak other Indo-European languages	1,042	1.8%	Speak other Indo-European languages	2,160	3.8%
Speak English "very well"	965	1.7%	Speak English "very well"	1,776	3.1%
Speak English less than "very well"	77	0.1%	Speak English less than "very well"	384	0.7%
Speak Asian and PI languages	1,332	2.3%	Speak Asian and PI languages	3,602	6.3%
Speak English "very well"	1,158	2.0%	Speak English "very well"	1,617	2.8%
Speak English less than "very well"	174	0.3%	Speak English less than "very well"	1,985	3.5%
Speak other languages	168	0.3%	Speak other languages	228	0.4%
Speak English "very well"	168	0.29%	Speak English "very well"	209	0.4%
Speak English less than "very well"	0	0.0%	Speak English less than "very well"	19	0.03%

Source: ACS 2017 (5-year Estimates), Table B16005

Town of Chapel Hill Language Access Plan

Starting with the ACS 2016 (5-year Estimates), the Census no longer released the data shown below in Table 5. Rather, the information is summarized, as shown above in Table 4 of the 2017 ACS. This change was due to new restrictions applied out of concern for respondent privacy protection. For this Appendix, we have included the 2015 ACS data on detailed language spoken as a reference.

Table 5. Language spoken at home by ability to speak English for the population 5 years and over

	Estimate	% of total population		Estimate	% of total population
Total Population	56,903				
English only	45,000	79.08%			
Spanish or Spanish Creole	3,206	5.63%	Polish	39	0.07%
Speak English "very well"	2,116	3.72%	Speak English "very well"	39	0.07%
Speak English less than "very well"	1,090	1.92%	Speak English less than "very well"	0	0.00%
French (inc. Patois, Cajun)	613	1.08%	Serbo-Croatian	0	0.00%
Speak English "very well"	532	0.93%	Speak English "very well"	0	0.00%
Speak English less than "very well"	81	0.14%	Speak English less than "very well"	0	0.00%
French Creole	44	0.08%	Other Slavic languages	263	0.46%
Speak English "very well"	44	0.08%	Speak English "very well"	214	0.38%
Speak English less than "very well"	0	0.00%	Speak English less than "very well"	49	0.09%
Italian	71	0.12%	Armenian	0	0.00%
Speak English "very well"	35	0.06%	Speak English "very well"	0	0.00%
Speak English less than "very well"	36	0.06%	Speak English less than "very well"	0	0.00%
Portuguese or Portuguese Creole	25	0.04%	Persian	56	0.10%
Speak English "very well"	25	0.04%	Speak English "very well"	56	0.10%
Speak English less than "very well"	0	0.00%	Speak English less than "very well"	0	0.00%
German	465	0.82%	Gujarati	84	0.15%
Speak English "very well"	431	0.76%	Speak English "very well"	67	0.12%
Speak English less than "very well"	34	0.06%	Speak English less than "very well"	17	0.03%
Yiddish	0	0.00%	Hindi	295	0.52%
Speak English "very well"	0	0.00%	Speak English "very well"	215	0.38%
Speak English less than "very well"	0	0.00%	Speak English less than "very well"	80	0.14%
Other West Germanic languages	58	0.10%	Urdu	187	0.33%
Speak English "very well"	58	0.10%	Speak English "very well"	187	0.33%
Speak English less than "very well"	0	0.00%	Speak English less than "very well"	0	0.00%
Scandinavian languages	70	0.12%	Other Indic languages	252	0.44%
Speak English "very well"	58	0.10%	Speak English "very well"	237	0.42%
Speak English less than "very well"	12	0.02%	Speak English less than "very well"	15	0.03%
Greek	118	0.21%	Other Indo-European languages	114	0.20%
Speak English "very well"	118	0.21%	Speak English "very well"	108	0.19%
Speak English less than "very well"	0	0.00%	Speak English less than "very well"	6	0.01%

This table is continued on the next page

Town of Chapel Hill Language Access Plan

Source: ACS 2015 (5-year Estimates), Table B16001

Table 5 cont.

	Estimate	% of total population
Russian	368	0.65%
Speak English "very well"	311	0.55%
Speak English less than "very well"	57	0.10%
Japanese	268	0.47%
Speak English "very well"	196	0.34%
Speak English less than "very well"	72	0.13%
Korean	987	1.73%
Speak English "very well"	384	0.67%
Speak English less than "very well"	603	1.06%
Mon-Khmer, Cambodian	22	0.04%
Speak English "very well"	0	0.00%
Speak English less than "very well"	22	0.04%
Hmong	41	0.07%
Speak English "very well"	41	0.07%
Speak English less than "very well"	0	0.00%
Thai	31	0.05%
Speak English "very well"	15	0.03%
Speak English less than "very well"	16	0.03%
Laotian	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Vietnamese	161	0.28%
Speak English "very well"	96	0.17%
Speak English less than "very well"	65	0.11%
Other Asian languages	852	1.50%
Speak English "very well"	503	0.88%
Speak English less than "very well"	349	0.61%
Tagalog	149	0.26%
Speak English "very well"	78	0.14%
Speak English less than "very well"	71	0.12%

	Estimate	% of total population
Chinese	2,727	4.79%
Speak English "very well"	1,503	2.64%
Speak English less than "very well"	1,224	2.15%
Other Pacific Island languages	30	0.05%
Speak English "very well"	30	0.05%
Speak English less than "very well"	0	0.00%
Navajo	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Native North American languages	7	0.01%
Speak English "very well"	7	0.01%
Speak English less than "very well"	0	0.00%
Hungarian	35	0.06%
Speak English "very well"	35	0.06%
Speak English less than "very well"	0	0.00%
Arabic	96	0.17%
Speak English "very well"	68	0.12%
Speak English less than "very well"	28	0.05%
Hebrew	10	0.02%
Speak English "very well"	10	0.02%
Speak English less than "very well"	0	0.00%
African languages	155	0.27%
Speak English "very well"	146	0.26%
Speak English less than "very well"	9	0.02%
Other and unspecified languages	4	0.01%
Speak English "very well"	0	0.00%
Speak English less than "very well"	4	0.01%

Source: ACS 2015 (5-year Estimates), Table B16001

TOWN SERVICES

The data below provides some information for certain Town services where data on interactions with LEP residents is tracked.

Table 6. Chapel Hill Public Housing Households Preferred Language (July, 2019).

Language	Number	Percent
English	183	64.7%
Burmese	50	17.7%
Karen	27	9.5%
Rohingya	8	2.8%
Spanish	7	2.5%
Arabic	3	1.1%
Chin	2	0.7%
French	1	0.4%
Mandarin Chinese	1	0.4%
Swahili	1	0.4%
Total	283	

Source: Chapel Hill Public Housing

Table 7: Change in Chapel Hill Public Housing Residents' Preferred Language

Language	Oct, 2018		July, 2019		Change over time	
	Number	Percent	Number	Percent	Number	Percent
English	199	68.9%	183	64.7%	-16	-8%
Karen	72	24.9%	27	9.5%	-45	-63%
Burmese	9	3.1%	50	17.7%	+41	+456%
Spanish	6	2.1%	7	2.5%	+1	+17%
Arabic	1	0.3%	3	1.1%	+2	+200%
Mandarin Chinese	1	0.3%	1	0.4%	0	0%
Swahili	1	0.3%	1	0.4%	0	0%
Rohingya	0	0	8	2.8%	+8	-
Chin	0	0	2	0.7%	+2	-
French	0	0	1	0.4%	+1	-
Total	289		283		-6	-2%



Some departments use remote **telephone interpretation** when needed. In fiscal year 2019 the Police Department used telephone interpretation for a total of 262 minutes (4.35 hours) and Building and Development Services used telephone interpretation for 3 minutes.

Appendix C: Town Departmental Language Access Survey

2019 TOWN OF CHAPEL HILL DEPARTMENT LANGUAGE ACCESS SURVEY

BACKGROUND & PURPOSE: In 2019, the Chapel Hill [Building Integrated Communities](#) (BIC) Team gathered information from each Town department to learn about their need and use for language services. This Departmental Language Access survey will help inform the development and implementation of the Town-wide [Language Access Plan](#).

SURVEYED DEPARTMENTS: 100% of Town departments participated in the Language Access Survey (See appendix for list of departments). Department directors or senior managers completed the survey on behalf of their department.

SUMMARY OF KEY FINDINGS:

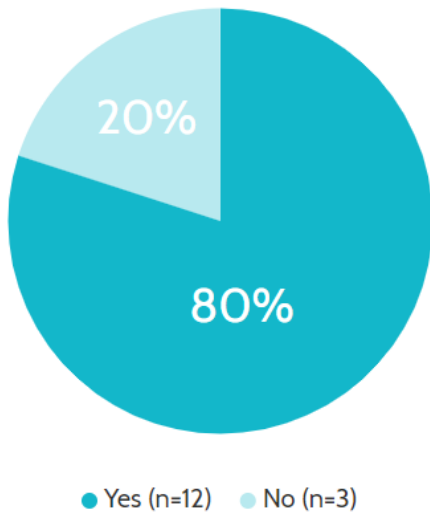
- 1. Internal capacity to provide language services within our existing workforce is very limited.**
 - 12 of 15 departments (80%) have at least one employee that speak a language(s) other than English. However, only x% of our total workforce (59) reported speaking a language in addition to English.
- 2. While limited in number, departments are using their employees to provide language assistance.**
 - 40% of departments have employees who use a language other than English as part of their job.
 - Only the Police Department has a pay incentive for employees who use this skill while working.
- 3. Language assistance services are not standardized across departments.**
 - Departments use a variety of methods for language assistance – from using employees as interpreters, community volunteers, and professional interpreters.
 - Various communications are translated, but there is no current procedure on identify which documents to translate.
- 4. Several departments are receiving federal funding, highlighting the importance of developing a Town-wide Language Access Plan that will comply with federal requirements.**

The following pages provide a detailed response analysis.

SECTION 1: Town employees who speak languages other than English

80% of departments have employees that speak languages other than English.

Do you have employees in your department that speak languages other than English?



Departments reporting 'no': Human Resource, Manager's Office, and Communications and Public Affairs.

However, there **not many employees speaking languages other than English.** Only an estimated **59 Town employees speak a language other than English.**

Language Spoken	# of departments with employees speaking the language	Estimated # of total employees
Spanish	10	42
Mandarin	2	2
Korean	1	1
Burmese	0	0
Karen	0	0
Other Languages	7	14

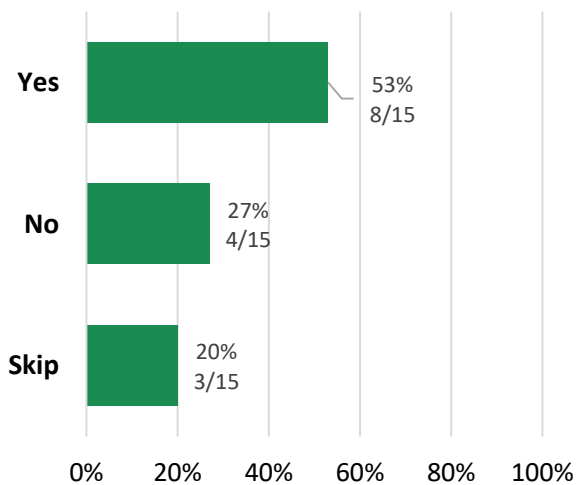
Estimated number of employees who **speak a language other than English:** **59**

Number of Town employees as of Nov 6, 2019* **701**

*Includes full-time and part-time staff only

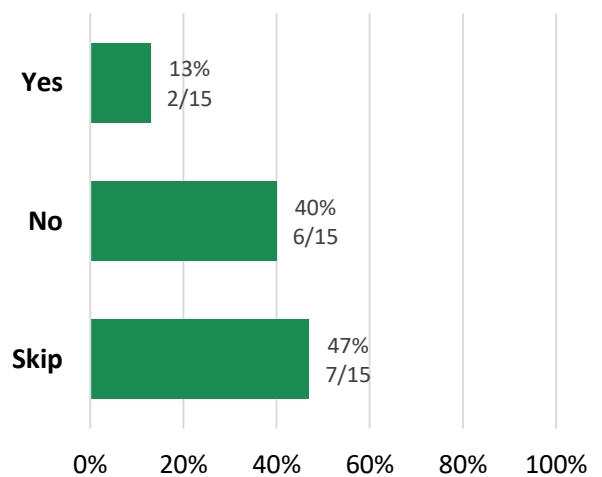
Over 50% of departments have employees who speak English as a second language.

Do any of your employees speak English as a second language? (n=15)



2 departments have employees who would benefit from translation/interpretation services.

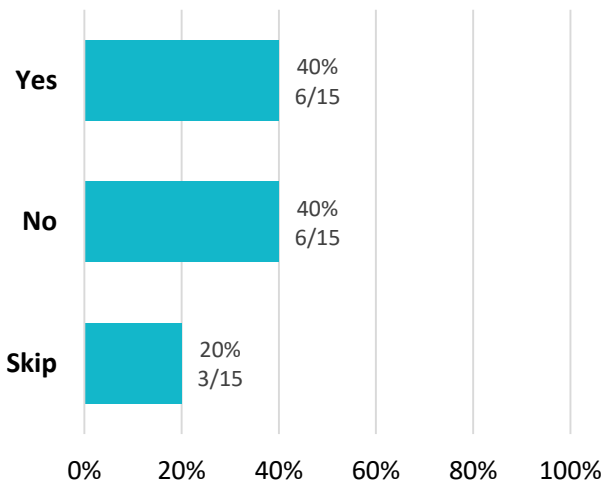
Would your employees benefit from translation/interpretation services?



SECTION 2: Employees using a language other than English as part of their job

40% of departments have employees who use a language other than English as part of their job.

Do any of your employees use a language other than English as part of their job?



Employees use their language skills to varying degrees.



Degree to which employees use language as part of their job	# of Departments	Department
Everyday	2	Fire, Parks and Recreation
At least 1x per week	2	Police, Library
At least 1x per month	2	Business Management, Housing and Community
Less than 1x per month	1	Public Works,
Skipped	9	--

Spanish is the most common language used.
 Language skills are often used informally, such as when interacting with residents in the field.

Recruitment, training, evaluation, and/or incentives for language skills are not common among departments.

- Parks and Recreation recently hired an employee(s) with language skills as part of their job description.
- Parks and Recreation had an employee with translation or interpretation certification (seasonal summer staff member, certification not a requirement).
- Police evaluates the non-English language capabilities of their employee(s).
- Police offers incentives to employees for speaking language(s) other than English as part of their job and promotes this in recruiting materials, visits, etc.



SECTION 3: Town translation and interpretation services

Departments use **different types of language services.**

11 departments have provided language services at some point in time.

Type of Service	# of Departments	Department
Telephone interpreter	4	Building and Development Services, Fire, Public Housing, Police
Staff serving as interpreter	5	Building and Development Services, Fire, Library, Parks & Recreation, Police
Community member(s)	4	Fire, Parks and Recreation, Public Housing, Town Manager
Language Service organization	8	Building and Development Services, Communications and Public Affairs, Fire, Housing and Community, Library, Public Housing, Transit



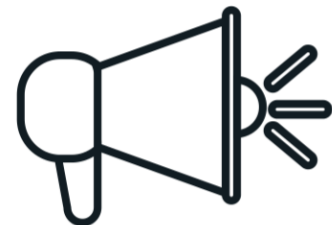
Departments typically **identify a need for language services** through:

- Difficulty in communicating with residents, patrons, etc.
- Knowledge of primary languages of target audience
- Requests from partnering agencies and groups
- Staff identification



Translation and interpretation **services are typically used for:**

- Community meetings
- Activities or programs
- Public communication
- Translating documents
- Crime reports



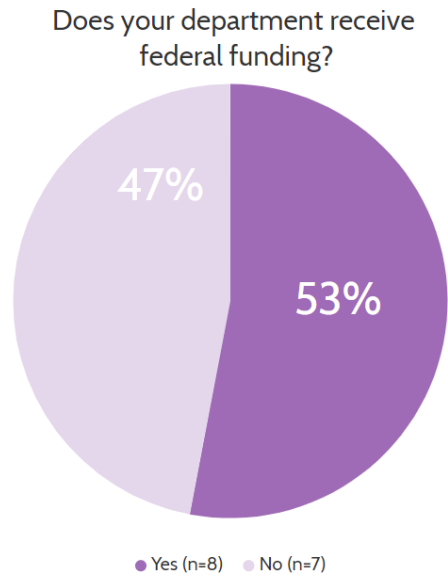
SECTION 4: Communications and services currently offered by departments

Department	Communications in Other Languages	Services Offered in Other Languages
Building and Development Services	<ul style="list-style-type: none"> Notices, working on permit applications and other information 	<ul style="list-style-type: none"> Interpreters for services, as needed
Business Management	<ul style="list-style-type: none"> None, but department mostly interfaces with internal customers and those communications are in English 	<ul style="list-style-type: none"> None
Communications and Public Affairs	<ul style="list-style-type: none"> Video spots on Facebook and Twitter regarding emergency notifications 	<ul style="list-style-type: none"> Interpreters for meetings can be provided
Fire	<ul style="list-style-type: none"> Working on emergency communications in other languages 	<ul style="list-style-type: none"> Public education events in Spanish where Spanish-speaking employees provided the program or public education event
Housing & Community	<ul style="list-style-type: none"> Translate flyers and notices, as needed 	<ul style="list-style-type: none"> Interpretation and translated materials for community events, as needed
Human Resource Development	<ul style="list-style-type: none"> Only as requested 	<ul style="list-style-type: none"> Only as requested
Library	<ul style="list-style-type: none"> Self-checkout interface (Chinese, French, and Spanish) Some promotions in Spanish For outreach events library card application forms are in Burmese, Karen, and Spanish 	<ul style="list-style-type: none"> Spanish language story times (occasional) Spanish language book club
Manager’s Office	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Parks & Recreation	<ul style="list-style-type: none"> Caution signs, fee reduction forms, registration forms, all camp communications (parent packets, fact sheets, cancellation forms, daily notices, etc.) 	<ul style="list-style-type: none"> None
Planning	<ul style="list-style-type: none"> Very occasional translations of meeting announcement flyers for special projects 	<ul style="list-style-type: none"> Very occasional meeting translation
Police	<ul style="list-style-type: none"> Newsletters when needed 	<ul style="list-style-type: none"> All services on an as needed basis
Public Housing	<ul style="list-style-type: none"> Some notices regarding emergent issues: weather conditions, OWASA concerns, safety issues. 	<ul style="list-style-type: none"> None
Public Works	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Technology Solutions	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Transit	<ul style="list-style-type: none"> Notices 	<ul style="list-style-type: none"> Transit

SECTION 5: Funding

Over 50% of departments have received federal funding (now or in the past).

- These departments should be taking steps to provide meaningful access to resources and services to limited English speaking proficient communities, based on Title VI of the Civil Rights Act of 1964.



Federal funds come from various sources and are used in various ways.

Department	Federal Funding Source	What are funds used for?
Library	LSTA grant funding from IMLS, administered through State Library	Variety of grant projects: Circulator, Explore More, podcast, etc.
Public Works	FHWA, FEMA, etc.	Capital projects
Transit	Department of Transportation	Capital and maintaining capital
Housing & Community		
<i>Public Housing</i>	Housing & Urban Development	Operations and Maintenance of Chapel Hill Public Housing apartments
<i>Affordable Housing & Community Connections</i>	Community Development Block Grant (CDBG)	Community development activities
Police	Federal grants	Purchasing equipment
Fire	Federal grants	Purchasing equipment

Currently, only Police and Housing and Community have dedicated funding in their budget for language access and assistance.

Departmental Survey

Two years ago, the Town's [Building Integrated Communities](#) (BIC) Team asked for your help in gathering information about your department's interpretation and translation services. We are back for an update!

The information gathered from this updated survey will help us as we advance a key strategy of BIC – developing a Town-wide Language Access Plan. With this Plan, we aim to make Town communications and in-person interactions with the Town accessible to Chapel Hill's low English proficient residents in their preferred languages.

As we develop the Language Access Plan, we will follow-up with you in August to share a draft and seek your input. Thank you!

Your Info

1. **Your Name:**
2. **Your Department:**

Employees

1. Do you have employees in your department that speak languages other than English?

If yes →

- a. How many employees by language spoken (insert # of employees in blank space provided)?
Spanish _____
Mandarin _____
Korean _____
ADD OTHER LANGUAGES _____
- b. Do any of your employees speak English as a second language? Y/N
 - i. If yes → Would they benefit from translation or interpretation services?

2. ****Do any of your employees use a language other than English as part of their job?**

If yes →

- a. How many of each language?
- b. Were they hired with this as part of their job description? Y/N
- c. To what degree do they use this language as part of their job?
 - i. Everyday
 - ii. at least 1x per week
 - iii. at least 1x per month
 - iv. less than 1x per month
- d. Do you evaluate their language capabilities? Y/N
If yes → How?

e. Do they have translation or interpretation certification?

3. Do you offer incentive(s) to employees for speaking languages other than English, including American Sign Language?

If yes → What type of incentive(s)?

Departmental Translation & Interpretation Services

4. What communications (newsletters, notices, signage, etc.) does your department currently offer in languages other than English?

5. What services does your department currently offer in languages other than English?

6. How frequently do you encounter a need for translation/interpretation services?

- a. Never
- b. Not Frequently
- c. Somewhat frequently
- d. Frequently
- e. Very frequently

If answer anything other than “never” → **How do you identify a need for translation and/or interpretation services? What are these services used for?**

7. **If your department provides translation or interpretation services, how do you provide it?

Select all that apply.

- a. Telephone interpreter
- b. Staff interpreter
- c. Language Service organization (Please indicate who you use: _____)
- d. Community member(s)
- e. We currently do not provide these services

8. **Does your department receive federal funding?

a. If so, where does this funding come from?

b. What does it go towards?

9. **Does your department have funding dedicated to language access / assistance?

10. Do you have any other comments?

Town Departments who completed survey

- Building and Development Services
- Business Management
- Communications and Public Affairs
- Fire
- Housing and Community
 - *Affordable Housing & Community Connections*
 - *Planning*
 - *Public Housing*
- Human Resource Development
- Library
- Manager's Office
- Parks and Recreation
- Police
- Public Works
- Technology Solutions
- Transit

Appendix D: Vital Documents

The Town of Chapel Hill will provide written translation of vital documents into the Town's primary languages: Burmese, Karen, Mandarin Chinese, and Spanish. Vital documents are those that are necessary for residents to use Town services or programs and to access Town information.

The Town will create and maintain an inventory of vital documents. Town staff will develop policies and procedures for consistently determining and updating the vital documents inventory. General document guidelines for vital documents will include, but not be limited to:

- Consent forms
- Complaint/feedback forms
- Eligibility criteria for Town services (e.g. Public Housing, etc.)
- Applications to participate in programs or to receive benefits or services
- Notices of rights, denial, loss or decreases in benefits or services
- Notices of Eviction, Leases ("for information purposes only") and Tenant Rules
- Notices of free language assistance
- Emergency, fire, and public safety information
- Any forms with the potential for significant community impact

Appendix E: Language Access Plans

Local NC Jurisdiction Plans

Orange County, NC Limited English Proficiency Policy: <http://orangecountync.gov/1920/LEP-Policy>

Winston-Salem LEP Policy and Procedures: <http://www.cityofws.org/Portals/0/pdf/human-relations/LEP%20Policy%20and%20ProceduresR.pdf>

City of Durham draft Language Access Plan:

https://cityordinances.durhamnc.gov/OnBaseAgendaOnline/Documents/ViewDocument/WS-Published%20Attachment%20-%2013238%20-%20OTHER%20-%20PROPOSED%20LANGUAGE%20ACCESS%20PLAN%20-%206_.pdf?meetingId=310&documentType=Agenda&itemId=11421&publishId=52347&isSection=false

City of Fayetteville: <https://fayettevillenc.gov/government/city-departments/human-relations/about-our-department>

City of Greensboro Language Access Program: <https://www.greensboro-nc.gov/departments/human-relations/education-and-outreach/language-access-program>

Other Plans

Minneapolis 2015 Language Access Plan:

<http://www.minneapolismn.gov/www/groups/public/@ncr/documents/webcontent/wcmstp-172695.pdf>

City of Madison, Wisconsin Language Access Plan:

<https://bloximages.chicago2.vip.townnews.com/madison.com/content/tncms/assets/v3/editorial/a/76/a768f98d-e61f-5658-bb64-6db36de4537d/5a970d56432a7.pdf.pdf>

Atlanta Regional Commission Limited English Proficiency Plan: <https://cdn.atlantaregional.org/wp-content/uploads/lep-plan-final-2017.pdf>

City of Cleveland Language Access Plan:

<http://www.city.cleveland.oh.us/CityofCleveland/Home/Government/LanguageAccessPlan#definitions>

City of Detroit Limited English Proficiency Plan: <https://detroitmi.gov/document/limited-english-proficiency-plan>

City of San Francisco Language Access: <https://sfgov.org/oceia/language-access>

NYC Department of Citywide Administrative Services: <https://www1.nyc.gov/site/dcas/about/language-access-plan.page>