

Language Access Plan

UNIVERSITY OF WISCONSIN-EXTENSION-COOPERATIVE EXTENSION



FOREWORD

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

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

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

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

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

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PART A

For administrators

SECTION 1

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

1.1 Mission statement

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

1.2 Organizational values

Community. We empower others and ourselves by listening to, learning from, and respecting local knowledge. We value our partnerships and believe community voices are critical to success. We work in community with one another to build a culture of collegiality.

Discovery. We promote lifelong learning, unbiased transformational education, and excellence through our scholarly work. We integrate University research with community-based knowledge to explore new solutions and their practical applications. We encourage innovation in teaching, research, and outreach to serve the public good.

Inclusiveness. We recognize, appreciate, and honor the differences, similarities, and contributions of all people and communities. We are intentional in our efforts to ensure equity, justice, and fairness. We embrace new ideas and approaches in our work.

Relationships. We foster positive relationships through honesty, open communication, and accountability. We meet educational needs by creating linkages among cultural, economic, and environmental contexts. We recognize and trust the essential and interconnected nature of all roles within Cooperative Extension.

Respect. We appreciate and serve as stewards of our state's resources. We honor and value each other's time and talents. We seek to maintain a balance between life and work priorities.

1.3 Why language access matters to our work in Cooperative Extension

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

1.4 Language access policy

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

SECTION 2

Cooperative Extension's language access plan

2.1 Definition of language access

Cooperative Extension defines language access as the strategic and systematic management of multilingual communication within different contexts and across various scales of delivery. With regard to Cooperative Extension activities, language access has two main implications. First, language access involves the provision of appropriate accommodations (e.g., translation and interpretation) to mitigate communication barriers caused by language differences. Second, language access refers to Cooperative Extension's collective effort to create programming, services, and activities that are culturally responsive and linguistically appropriate for persons with limited English proficiency (LEP). The purpose of creating language access is to ensure equal footing and equitable participation in programs and activities for LEP persons and audiences.

2.2 What is limited English proficiency (LEP)?

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

2.3 Key terms

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

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

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

- **Simultaneous interpretation** is a mode of interpretation commonly used in large-scale meetings, conferences, trainings, and presentations. The simultaneous interpreter listens to the speaker and simultaneously interprets the message from the source language to the target language. One-way microphone systems are often used for settings that need simultaneous interpretation.
- **Consecutive interpretation** is a mode of interpretation that is commonly used in small-scale meetings. The consecutive interpreter waits for the speaker to finish a sentence or an idea, and then renders the speaker's words into the target language.
- **Remote/distance interpretation** is a mode of interpretation that uses technology, usually phone or tablet, to remove communication barriers. The use of technology does not require the interpreter to be in the same location as the two speakers needing language support.
- **Sight translation** is the oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

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

Limited English proficient (LEP) persons are those who do not speak English as their primary language and/or who have a limited ability to read, write, speak, or understand English. LEP persons may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

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

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

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

2.4 Purpose of the language access plan

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

2.5 Document scope

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

SECTION 3

Language access accountability

3.1 Language access is a matter of civil rights

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

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

3.2 Guiding legal framework for language access accountability

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

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

3.3 The federal standard for serving LEP audiences

Reasonable steps

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

Four-factor analysis

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

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

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

Denying a request for language support services

Our organization has a legal obligation to provide accommodations for individuals with limited English proficiency. Therefore, it is unlawful to deny a request for language support services to a person who is a participant, or wants to participate in Cooperative Extension programs, services, and activities.

Requests made by members of the public

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

Programming that requires critical or vital communication

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

General educational programming

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

SECTION 4

Language access and Cooperative Extension

4.1 Standards for serving LEP audiences through Cooperative Extension activities

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

Free language support services for LEP audiences

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

Public notification of language support services

Cooperative Extension will provide public notification about the free and rightful access LEP audiences have to translation and interpretation services as a part of our organizational activities. Public notification includes providing information in multiple languages as applicable.

Maintain records of efforts to identify and serve LEP audiences

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

- Communications from the language access coordinator and the Cooperative Extension Dean's Office pertaining to language access resources and tools.
- Programming and projects provided in a multilingual format.
- Tracking language support services used (language support requests, archives of translated materials, events that used interpreters, service delivery evaluations, etc.).
- County-based language needs assessment tool (see **Section 6**).
- Data that supports a collective understanding of linguistic and cultural diversity in given service area or sector (e.g., U.S. Census Bureau, Department of Agriculture, Wisconsin Department of Public Instruction, Applied Population Laboratory at UW-Madison, or other reliable sources).
- Empirical data on LEP persons within a given service area (American Community Survey/U.S. Census Bureau).
- Evidence of partnerships with community agencies that serve LEP persons and/or communities.

Training

Cooperative Extension's director of Diversity and Inclusion, in conjunction with the language access coordinator, will provide leadership for training and resources that help the organization meet its language access needs and goals.

Monitor and evaluate language support services

As the primary guidance document for the organization, this LAP provides tools and guidance for ongoing assessment of efforts to serve LEP populations. The LAP will be reviewed and updated every two years or otherwise as determined appropriate by organizational stakeholders. The dean, director of Diversity and Inclusion, and language access coordinator will provide ongoing administrative oversight for monitoring and evaluating the reach and impact of language access efforts.

Expand programming access to underserved populations

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

4.2 How to budget funds for language access needs**Interpretation services**

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

exceed a certain amount of time. It is important to discuss the rates and policies of interpreters and agencies prior to booking them for an event. The language access coordinator is available to help identify measures of quality when contracting with interpreters for events.

Translating documents

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

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

Overview

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

Discrimination complaint form

The UW-Extension and UW Colleges form for filing a discrimination complaint is available at: https://inclusion.uwex.uwc.edu/sites/inclusion.uwex.uwc.edu/files/complaint_form_oedi_updated_2017_0.pdf

Who can file a discrimination complaint?

Any person has the right to file a complaint.

Filing a complaint

The UW-Extension and UW Colleges process following filing a complaint is available at: <https://inclusion.uwex.uwc.edu/sites/inclusion.uwex.uwc.edu/files/Complaint%20Procedures.pdf>

For specific questions related to discrimination complaints, please contact:

<p>UW-Extension Cooperative Extension Dean’s Office 601 Extension Building 432 N. Lake Street Madison, WI 53706 Phone: (608) 263-5110, 711 for Relay Fax: (608) 265-4545</p>	<p>UW-Extension and UW Colleges Office of Equity, Diversity and Inclusion 201 Extension Building 432 N. Lake Street Madison, WI 53706 oedi@uwex.uwc.edu</p>
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4.4 Cooperative Extension contacts for language access

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

<p>Shelley King-Curry Director of Diversity and Inclusion 601 Extension Building 432 N. Lake Street Madison, WI 53706 (608) 263-5110, 711 for Relay shelley.king-curry@ces.uwex.edu</p>	<p>Dominic J. Ledesma Language Access Coordinator & Bilingual Editor 227B Extension Building 432 N. Lake Street Madison, WI 53706 (608) 263-1125, 711 for Relay dominic.ledesma@ces.uwex.edu languageaccess@ces.uwex.edu</p>
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PART B

For colleagues

SECTION 5

Language access support for Cooperative Extension activities

5.1 Statement of organizational support

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

5.2 Reasons to need language support services

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

- To enable LEP members of the public the rightful opportunity to participate in Cooperative Extension programs, activities, and services;
- To communicate public information about Cooperative Extension activities in a multilingual format;
- To aid Cooperative Extension staff in communicating with with LEP persons; and
- To assist with the coordination of emergency-response situations.

5.3 Emergency situations

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

For immediate assistance with multilingual communication during emergency situations, please contact (608) 263-1125 or e-mail languageaccess@ces.uwex.edu.

5.4 Available language support services

Translation project management

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

Interpretation services

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

Programming and project consultation

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

Training

Cooperative Extension is currently in the process of collecting data to assess and develop training around language access. If you have questions related to training issues and needs, please contact the language access coordinator at languageaccess@ces.uwex.edu.

Simultaneous interpretation equipment loan/rental program

Cooperative Extension has two sets of one-way microphones, each with 24 receivers, to use during programs, activities, and services that need simultaneous interpretation. Cooperative Extension staff can request to use this equipment using the language support request form (see **Section 7**).

There is no charge for staff requesting to use the equipment for programming events. However, the county office sponsoring the programming will be expected to cover costs of shipping if the event is located outside of the Madison area and no alternative arrangements for pick-up and drop-off can be made. Organizations external to Cooperative Extension can rent the simultaneous interpretation equipment for a fee of \$50.00 per day plus shipping costs. There is no charge for shipping the equipment if the organization can make alternative arrangements with language access staff to pick up and drop off the equipment before and after the event.

Assistance for deaf or hard of hearing clientele

The Americans with Disabilities Act (ADA) protects individuals who are deaf or hard of hearing. The University of Wisconsin Colleges and University of Wisconsin-Extension Office of Equity, Diversity and Inclusion (<http://inclusion.uwex.uwc.edu>) is our institutional coordinator for this specific protected audience and manages accommodation requests through a process that is separate from language accommodations provided under Title VI. However, we are committed to working collaboratively with the OEDI to ensure that any request for a language accommodation, regardless of the audience or type of barrier, is met with the appropriate organizational response.

5.5 Requesting support

How to request support

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

- Complete the online [language support request form \(LSR\)](#).
- Visit the [language access support website](#) to find information and resources on serving LEP populations.
- Contact the language access coordinator at languageaccess@ces.uwex.edu.

Eligibility for requesting and receiving organizational support

- **Who can request and receive support?**

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

- **What about Cooperative Extension's partner organizations?**

Any inquiries related to language support services that do not directly serve the needs of Cooperative Extension staff for programming or other organizational purposes should be directed to the language access coordinator at languageaccess@ces.uwex.edu.

5.6 Is there a cost for requesting support?

Is there a cost to fill out an LSR online?

There is no charge for requesting support through the online LSR form.

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

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

SECTION 6

Guidelines for working with the Language Access Team

The Language Access Team provides translation, interpretation, and multilingual project consultation for programming carried out by Cooperative Extension's departments, institutes, and centers. The following section helps Cooperative Extension colleagues understand their role in managing projects when receiving support from Cooperative Extension's Language Access Team.

6.1 Before you request support for a project or event

Departure point: Identifying your target audience

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

Project or event planning timeline

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

Baseline information related to your project or program

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

Translation services

- **Obtaining permission to translate content**

The Language Access Team assumes that the person making the translation request has proprietary rights to the materials or has obtained necessary permissions to translate any text-based materials, graphic items, and accompanying descriptions.

- **Vital details related to your project**

Please have the following information available when you make your request for translation support (as applicable):

- Details related to the project (overview of project, brief description of components, project size or number of pages, intended audience, etc.).
- The name(s) of any funding source(s) that will be used to support the project or event.

- The name(s) of the project’s point person if not the same as the person making the request.
- Additional persons or organizations that are collaborating on the project or event.
- **Project file requirements for translation requests**
When the Language Access Team requests your source documents, please make sure your project files are:
 - Final versions that require no further major edits to the content.
 - Separated and saved as different components (e.g., saving pre-test and post-test assessments as individual files rather than collating them and saving as a single Word document).
 - In a format that can be edited (i.e., no scanned images of documents); this includes graphics.

Interpretation services

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

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

Project consultation

The LSR is intended to help Cooperative Extension staff during the process of planning inclusive programming, especially related to working with a multilingual audience. If you plan to use the LSR for a general project consultation, please use the information requested in the previous sections to provide the Language Access Team with as much context as possible for your or your group’s project or event idea.

SECTION 7

Requesting support for your project

The following section explains the process for requesting language support through the online form available at https://uwex.co1.qualtrics.com/SE/?SID=SV_6JzcG27apuXZVhH.

7.1 The online language support request (LSR) form

Purpose

The language support request (LSR) form provides a centralized, streamlined way for Cooperative Extension staff to find support for their language access needs with educational projects and events. Its purpose is to supplement and enrich, rather than impose upon, staff’s current capacity to meet ongoing language access needs across the state. Staff is welcome to continue using any existing protocols and resources found to be effective for promoting greater inclusion of linguistically diverse populations in their local program service area.

Completing the LSR

The LSR is an online form that takes about 10 minutes to complete. It serves as an initial intake tool and asks you to provide information about your role in Cooperative Extension and the nature and scope of the project/ event. The information requested through the LSR helps language access staff to 1) better understand the unique nature of your particular programming project, and 2) anticipate the project’s language access needs.

After you submit your LSR

Once you submit your LSR, language access staff becomes a part of the programming process. A project manager will follow up with you to confirm that we received your request and indicate the next steps to take. Depending on the nature of the project and the information you provided, we may have additional questions, need additional details, or want to discuss your project/event further.

Language Access Team's role

Language access staff works directly with the requester and can provide support during multiple points of the project or event planning and execution process. Staff will work with the requester in ways that help them understand how to identify and meet their language access needs, and help broker the relationship with professional service vendors when necessary. Working with language access staff helps assure high quality services that are as time, cost, and energy efficient as possible. Support for projects or events can include:

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

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

Average lead time to support projects and events

A lead time of three weeks is needed to respond to most requests for language support. This estimate starts once the language access team has all the information and documents needed to authorize the job with our translation service vendor and edit once it is translated. Please note, however, that the amount of time needed to translate projects ultimately depends on the size of the project, its various components, the timeliness of a staff member's response to our questions about the project, our staff capacity and workload, vacation schedules, etc. The project manager will be able to provide a more specific turnaround time once the LSR is submitted and we have had the opportunity to consult with our translation service vendor.

• Interpretation assignments

In most cases, language access staff contracts with independent service providers for interpretation needs during events. Depending on the language pair, location, and other logistical considerations involved with providing interpreters during in-person events, a minimum of three weeks is a standard amount of time needed to coordinate services. Requesting estimates from service vendors, scheduling the interpreter(s), relaying event details and other information related to the event are some of the factors that require time.

• Translation projects

Language access staff contracts with independent service providers for translation projects. Depending on the language pair, nature and scope of the document(s), and other considerations involved with large or small-scale translation of documents, approximately three weeks is needed from authorization of the translation to delivery to the requester. Small projects being translated through single requests (e.g., brochures, posters, newsletters, etc.) may have a quicker turnaround time whereas larger scale projects with multiple components (e.g., creating bilingual curriculum, multi-modal program delivery, etc.) may require more time to coordinate.

- **Project consultation**

This type of language support offers educators a way to think through and discuss their project idea while considering the unique attributes of their target population. Project consultation helps educators consider the language access needs that are both culturally responsive and linguistically appropriate for their project/event. In most cases, the need for translation and interpretation services stems from the consultation. Therefore, it is important for the educator to keep in mind a three-week standard for contacting language access staff and requesting support.

- **Simultaneous interpretation equipment loan and rental program**

The simultaneous interpretation equipment is available to use for Cooperative Extension activities. If an educator is interested in using the equipment for in-person programming, we ask for a three-week period in order to ensure its availability and to work out logistical details for shipping the equipment if necessary.

Cost and funding considerations for language access projects

- **Projects requiring additional approval**

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

- **Cost sharing**

There is no fee for requesting language support services. However, depending on the nature of the project, program areas may be partially or wholly responsible for sharing the costs of providing translation and interpretation services. The language access coordinator in coordination with program area leadership will determine funding implications and cost sharing responsibility for projects. For circumstances related to the nature of organizational responsibilities and legal accountability for ensuring language access, please refer to **Sections 2 and 3**. The language access coordinator is available to provide guidance on whether or not cost sharing is necessary for Cooperative Extension programs, services, and activities that need language support services.

- **Project funding**

The LSR form asks if funding for the project is available. If funding is available, the requester is asked to list the source of funding in order to facilitate the payment process between the service vendor and the requester's unit. If funding is not available, language access staff will work with the requester to ensure that the project needs are appropriately addressed and met. The cost associated with meeting our language access needs should never create an unnecessary barrier to fulfilling our legal responsibilities and providing meaningful access to LEP persons.

- **Invoicing**

- **Projects with funding**

For projects that do have funds to cover the costs of services, the program area, or respective point person, will be responsible for processing the invoice and paying the service vendor directly. The language access coordinator will work with the designated point person and provide guidance on how to pay for services.

- **Projects without funding**

For projects that do not have funding available, the invoice for services will be processed by the language access coordinator and paid for using funds with approval from the Cooperative Extension Dean's Office.

SECTION 8

Standards of practice for county offices

8.1 Identifying language access needs in your service area

County office language access needs assessment tool

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

8.2 Understanding the professional profile of translators and interpreters

Language competence vs. translation competence

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

Industry standards for qualifications and credentials

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

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

8.3 Using interpreters and translators on your own for local use

Professional translators & agencies

In addition to the criteria listed above, staff is expected to hire professional service vendors that can attest to solid professional experience as well as speak to tools, practices, processes, and credentials that support the quality of their work. This includes but is not limited to flexibility to work with documents in different formats, Computer Aided Translation (CAT) tools they may use (e.g., SDL Trados, WordPerfect, etc.), and any other additional processes they use for editing, formatting, and proofing their translations. These should be discussed in the initial conversation or meeting to understand the service vendor's process for assuring quality and how they charge for services. Refer to the language access website in **Section 9** for information on this topic.

Professional interpreters & agencies

In addition to the criteria listed above, educators should look for a professional service vendor that is reputable, punctual, professional, and flexible. A professional interpreter should have a solid understanding of the scope of work as well as any additional ethical considerations for service delivery. Refer to the language access website in **Section 9** for information on this topic.

Building a talent pool of qualified service vendors

Cooperative Extension language access staff only contracts qualified professional service vendors to provide translation and interpretation services. Please contact the language access coordinator at languageaccess@ces.uwex.edu with questions about the profile of service vendors we hire for projects. Likewise, we are always interested in expanding our potential pool of professional service vendors who meet the criteria listed above. Please share the following link with qualified professionals where appropriate: [Vendor Profile Information Form](#). This information is also available on the language access website (see **Section 9**).

Community or volunteer interpreters

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

The use of minors as interpreters

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

The use of web-based translators

Web-based translators such as Google Translate are not to be used for translating organizational materials. Using web-based translators to create materials in a multilingual format creates unreliable, unethical, and inconsistent results. This is contrary to the notion of ensuring and expanding access to programming and creates a disservice to the communities we seek to serve. While easy to use and a free resource, web-based translators are not a suitable alternative to sourcing professional translators and/or working with the Language Access Team.

8.4 Asking bilingual staff to serve as translators and interpreters

Scope of responsibilities

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

Training

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

8.5 How to budget funds for language access needs

Interpretation services

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

Translating documents

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

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

Overview

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

Discrimination complaint form

The UW-Extension and UW Colleges form for filing a discrimination complaint is available at: https://inclusion.uwex.uwc.edu/sites/inclusion.uwex.uwc.edu/files/complaint_form_oedi_updated_2017_0.pdf

Who can file a discrimination complaint?

Any person has the right to file a complaint.

Filing a complaint

The UW-Extension and UW Colleges process following filing a complaint is available at:

<https://inclusion.uwex.uwc.edu/sites/inclusion.uwex.uwc.edu/files/Complaint%20Procedures.pdf>

For specific questions related to discrimination complaints, please contact:

UW-Extension Cooperative Extension Dean's Office 601 Extension Building 432 N. Lake Street Madison, WI 53706 Phone: (608) 263-5110, 711 for Relay Fax: (608) 265-4545	UW-Extension and UW Colleges Office of Equity, Diversity and Inclusion 201 Extension Building 432 N. Lake Street Madison, WI 53706 oedi@uwex.uwc.edu
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SECTION 9

Additional resources

9.1 Language access resources

Organizational web page for language access support:

<http://blogs.ces.uwex.edu/languageaccess>

Legal framework for language access accountability:

<http://blogs.ces.uwex.edu/languageaccess/translating-style-guide/>

County office tool kit:

<http://blogs.ces.uwex.edu/languageaccess/translating-style-guide/>



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