



Morrison County provides cost-effective, high-quality services in a friendly and respectful manner.

Health and Human Services

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Limited English Proficiency (LEP) Plan

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100 - Purpose and Legal Basis

The following document serves as the Morrison County Health and Human Services (MCHHS) plan to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964; 7 CFR, 273 et seq; and 42 CFR 435 et seq. There are four components to this document.

200 - Assessment

400 - Training

300 - Policy

500 - Monitoring

200 - Assessment

201 - Needs Assessment - MCHHS will on at least an annual basis make a needs assessment of the unique language needs within Morrison County. Morrison County will review data provided by DHS or the Census Bureau to identify the types of non-English languages that are most predominant in Morrison County. We will review those which constitute populations that the County serves or those that may be eligible for County-provided services.

202 - Case Finding - Specific language needs of each applicant with LEP will occur at the time of intake or application. This will primarily be done by reviewing the language preference questions on the Health Care Application (HCAPP) and the Combined Application Form (CAF). Language preferences will be entered into the applicant's primary language field in the MAXIS system. If an interpreter is needed, it also will be entered in the MAXIS system. If the main receptionist or intake worker suspects that the applicant is a person with LEP, the worker will present the LEP person with a card that lists the ten major languages in order to determine which language is involved, if any. It is expected that reasonable efforts will be made by MCHHS to provide same-day interpreter services.

203 - Points of Contact - The greatest likelihood of need for interpreter services will be at the point of application for financial assistance or when a current customer calls into the agency. The principal point of contact will most likely be in the office setting in Little Falls or by phone. The most appropriate form of interpreter services will likely be language assistance in completion of an application for financial assistance, health care, or social services programs. The other point of contact may involve field-based contact when conducting child protection assessments or pre-petition screenings for civil commitments. These contacts will typically take place in a private residence. In most cases the initial contact will require the use of the Language Line Services due to the unscheduled nature of the contact both in field and office settings and over the phone.

204 - Resources Needed - MCHHS will utilize services available through U-Care, 1.866.457.7144; Blue Cross Blue Shield, 1-800-262-0823; The Language Line or other private interpreters known to the Agency when face-to-face or certified interpreter/translator services are needed. Additionally, MCHHS has an agreement with the State Department of Administration to obtain Language Line Services (1-800-367-9559) for non-English speaking clientele. Language Line Services can be provided by phone, iPad or interactive television (ITV). When appropriate, and accessible the use of ITV or iPads will be considered and preferred.

205 - Timely Access - Services available from U-Care, Blue Cross Blue Shield or The Bridge World Language Center are available during customary business hours, Monday through Friday, 8:00 a.m. to 4:30 p.m. Language Line Services are available 24x7. Contact with either entity will be made by commercial phone. When on-site interpreter services are to be used, it will be necessary to schedule appointments at mutually convenient times - for the client and the interpreter. Use of ITV, if used, will occur in a private setting within the Courthouse buildings.

300 - Policies and Procedures

301 - Agency Commitment - MCHHS is committed to the spirit of the Civil Rights Act of 1964. It recognizes the importance of providing meaningful access to all persons, including persons with LEP, to the various programs operated under the umbrella of Morrison County Social Services.

302 - Range of Oral Language Assistance - There will be limited oral language assistance on site at Morrison County Social Services from current agency employees. With no language being identified as a primary non-English language in Morrison County, we will rely on provider organizations that have the capacity to serve a broad range of languages. The Language Line Services will be used when more immediate needs for interpreter services are identified across the full spectrum of languages. MCHHS will take advantage of the brief "notice of rights to language services" documents for persons with LEP as they are made available by the Department of Human Services.

303 - Uncommon Languages - There may be circumstances when customers present for services that use a language other than that most commonly used in Morrison County. There may be languages such as Russian, Chinese, Hmong, Vietnamese, Khmer/Cambodian, Lao, Somali and the like. Receptionist staff will refer all such cases to the Income Maintenance Unit. If they are not able to determine the person's language, they will ask an agency supervisor or the director for assistance. This person will be responsible for trying to determine the customer's language or country of origin. Once determined, contact will be made with an appropriate Language Line Services interpreter in the customary manner.

304 - Affirmative Action - The MCHHS employee handling the case will inform either the customer or the interpreter once it has been determined that interpreter services are needed, that there is no charge or fee for the service. This will be communicated in verbal form. At no time in the service delivery process will the customer incur any costs associated with LEP-directed interpreter services.

305 - Use of Family and Friends - Use of family or friends as interpreters is not the preferred method of providing interpreter services. However, when the worker has determined that it is not feasible to use formalized interpreter services, a consultation will be made with that worker's immediate supervisor or director. Alternative methods of customer service will need to be discussed. If the agency has determined that a family member, friend or other responsible party can adequately perform the interpreter service, approval may be given. Consideration will be given of the following factors: 1. the client's data privacy rights will be protected, 2. the quality of the interpreter services to be provided by the family member or friend will be acceptable, and 3. participation of a family member or friend is appropriate given the nature of the contact (ex: child protection assessments). The agency will document the extenuating circumstances for use of family or friends. Under no circumstances may minor children be used for interpreter services.

306 - Competency Standards for Interpreters - Any interpreter used for LEP services must be bilingual: fluent in English and fluent in the language of the customer needing the service. When using well-recognized interpreter services provided from a recognized agency - such as U-Care, Blue Cross Blue Shield or The Bridge World Language Center, and Language Line Services, competency is presumed. When using family, friends or significant others, the intake worker must make a judgment as to the competency of the proposed interpreter. "Certification" as an interpreter is not a prerequisite.

307 - Dissemination of LEP Plan - Copies of the LEP Plan will be provided to the following: all MCHHS employees who have direct customer contact (An email will notify staff that policy is updated and is on our shared drive when needed for access. This is also discussed at least annually at staff meetings), Central MN Legal Services, Morrison County Public Health Service and Morrison County Courthouse.

308 - Services to Illiterate - When confronted with a situation in which the customer cannot read or write in his or her native language - it is incumbent that MCHHS find a suitable interpreter, one who can assist the person in completion of necessary forms, documents and the like. The MCHHS intake worker needs to make the determination, in conjunction with the interpreter, about the customers' literacy skills. The clear choice in dealing with cases of illiteracy will be to have an on-site interpreter. It may be necessary to schedule interviews when face-to-face interpreter services can be provided. Use of the ITV, faxing of forms, and over-the-phone services may be required on a case-by-case basis.

309 - Emergency Situations - When a determination has been made that an emergency exists and LEP considerations are identified as being present, MCHHS may waive all procedures in order to insure necessary emergency services are provided. Extraordinary efforts need to be put forth before circumventions of non-emergency procedures are followed. Consultation with a Supervisor or the Director is necessary before such action is taken. On Call situations, The Language Line Service should be accessed by the worker without consultation with the Supervisor or Director when determined necessary.

310 - Access to and Costs of Interpreters - Under no circumstances will MCHHS indicate - either verbally or in writing - that any applicant or client in need of LEP services will be charged for interpreter or translation services. All such services will be at no expense to the applicant or client. Such services will be provided during all normal business hours and when necessary, during non-business hours when an emergency has been determined to exist.

311 - Notice of Service Availability - LEP clientele will be informed of the availability of free interpreter and translation services at the point when it appears that the customer is not able to communicate in English. Notice of service availability will come from the public notice document in the central reception area. Distribution of the LEP Plan to various parties cited above will help in putting those entities on notice that interpreter and translation services are available on a timely basis and free of charge. Insofar as the Department of Human Services has translated many forms into multiple languages, MCHHS will make them available automatically to LEP clientele. Access to the Department's website at www.dhs.state.mn.us/forms will be made.

312 - County-Produced Materials - Insofar as the LEP census in Morrison County is low in all languages, it is not anticipated that MCHHS will develop any internal materials. Rather, MCHHS will rely on the state-produced documents as the primary source of translated materials. Downloading of documents from the DHS web-page will also be used as necessary. MCHHS will follow DHS's translation numerical guidelines as required.

313 - Complaint Resolution Protocol - Any adverse action taken by MCHHS with which an applicant or recipient disagrees is subject to complaint. MCHHS has a formal complaint process that can be utilized to try to resolve any dispute. In the absence of local resolution, the person making the complaint will be informed in a language understandable to the grievant, of the process to follow in making a complaint to DHS or the Office of Civil Rights. The complaint procedure will conform in all respects to the extant MCHHS procedure included in Civil Rights Compliance Requirements. Appropriate use of interpreter services with either U- Care, Blue Cross Blue Shield, The Bridge World Language Center, or Language Line Services to facilitate the dispute resolution process will take place. All such complaints can be made to any of the parties listed at the top of this LEP Plan.

314 - Posting - A copy of the MCHHS LEP Plan will be posted on the county website.

400 - Training

401 - Distribution of LEP Plan - All MCHHS employees are given a copy of the document via email and notified of the location in the shared drive in agency file and on our website.

402 - Training of Staff - Initial - For any new employee affected by the LEP Plan, this document will be incorporated into that person's "generic orientation" protocol at the time of hire.

403 - Training of Staff - Ongoing - On at least an annual basis at each unit's staff meeting, a review of the LEP Plan will take place.

500 - Monitoring

501 - Evaluation of the LEP - On at least an annual basis, the LEP Plan will be reviewed for effectiveness. This review will normally take place toward the end of the calendar year. It will be coordinated by the MCHHS LEP Coordinator. The evaluation will involve consultation with representatives of each unit to determine compliance with the LEP Plan, identification of any problem areas and development of required corrective action strategies. Elements of the evaluation will include the following:

- number of persons with LEP in Morrison County
- assessment of current language needs of MCHHS applicants and clients to determine if clients needing an interpreter and/or translated materials are receiving needed assistance
- updating case files which lack information about a client's language preference; determining if clients need to be asked their language preference at the time of certification and recertification
- determining whether existing assistance is meeting the needs of applicants and clients with LEP
- assessing whether staff members understand MCHHS LEP policies and procedures and how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible

502 - LEP Contact Person -For purposes of the LEP Plan, Morrison County's designated contact person is the Director with appropriate delegation made to all agency supervisors.

NOTE: U-Care uses OPI for Interpreters. 1.877.746.4674. Inform U-Care of the language that is needed Confirm where you are calling from:

Your client is Morrison County
Your Department Code is 1208.

Somali Culture Norms:

As a Somali person, **the correct noun is Somali**. There is no "Somalian." The country is called Somalia, the people Somali, the language Somali, the culture Somali. **There is no sub-category for "Somalian" to those who only live in Somalia.**

- Show greater respect to elders in all circumstances and situations. Their age is thought to indicate wisdom, knowledge and experience.
- Stand up when someone older than yourself enters a room.
- Always offer your seat to someone who is older than yourself.
- Men shake hands only with men, and women shake hands with women.
- Repeat any offer multiple times to show that you are being genuine and not just being polite. For example, if you offer to drive a Somali home, they are likely to initially decline the gesture out of politeness even if they have no other form of transport. You should insist that you want to help.
- It is advisable to exercise sensitivity talking about their homeland and migration journey. Most Somalis hold their country and people very close to their hearts. However, be aware that some may still experience trauma associated with memories of their time in Somalia.
- Repeat any offer multiple times to show that you are being genuine and not just being polite.
- It is rude to show, point or expose the soles of your feet to another person whilst sitting.

Spanish Culture norms:

- Hispanic culture is to be respectful and courteous, especially when in the company of parents or elders.
- Refer to Mexican migrants living in the US without paperwork as “undocumented migrants”. Avoid using the term “illegal”.
- Avoid referring to the United States as “America”. Mexico is also a North American country, and some people can find it frustrating when the term is used to solely refer to those from the USA.
- Spanish norm is constantly arriving late to meetings, appointments, get togethers, etc.
- Hispanics, more so than the general public, believe in the efficacy of hard work.
- Levels of personal trust are lower among Latinos than they are among the general public.
- Religion is more important in the lives of immigrant Hispanics than in the lives of native-born Hispanics.
- Most Hispanics use Spanish but use of English rises through the generations.
- Hispanics believe Learning English is important, but also want future generation to speak Spanish.