



Baltimore County Department of Planning Language Access Plan For Limited English Proficiency 2015

Introduction:

Baltimore County Department of Planning Language Access Plan

This Language Access Plan (LAP) addresses Baltimore County Department of Planning's (BCDP) responsibility as a recipient of federal Community Development Block Grant (CDBG) funds, as it relates to accommodating the needs of persons that experience limited English language skills. Baltimore County Department of Planning is committed to providing meaningful access to all individuals who need and/or seek to participate in any of its CDBG funded activities. The development and implementation of a Language Access Plan will assist Baltimore County in meeting its goal of Affirmatively Furthering Fair Housing, which in general, is using federal financial assistance and other program resources to overcome barriers to fair housing choice. This plan is also meant to assist BCDP in its efforts to expand social and community opportunities for its extremely low to moderate-income residents.

I. Purpose

The purpose of this Language Access Plan (LAP) is to provide assurances and demonstrate that clients of Baltimore County Department of Planning are being provided meaningful access to program information, benefits, and services although the clients may be limited in their English Proficiency. This plan will be reviewed periodically and updated as needed to refresh the assurances contained within the plan, including any changes in federal, state or local government laws and/or methods of application.

Baltimore County Department of Planning is committed to ensuring the entire Department of Planning is in compliance with all relevant federal requirements involving applicants/recipients of program information, benefits and services who are Limited English Proficient (LEP).

As a recipient of federal funding, Baltimore County Department of Planning must take reasonable steps to ensure meaningful access to the information and services it provides.

Four Factor Analysis

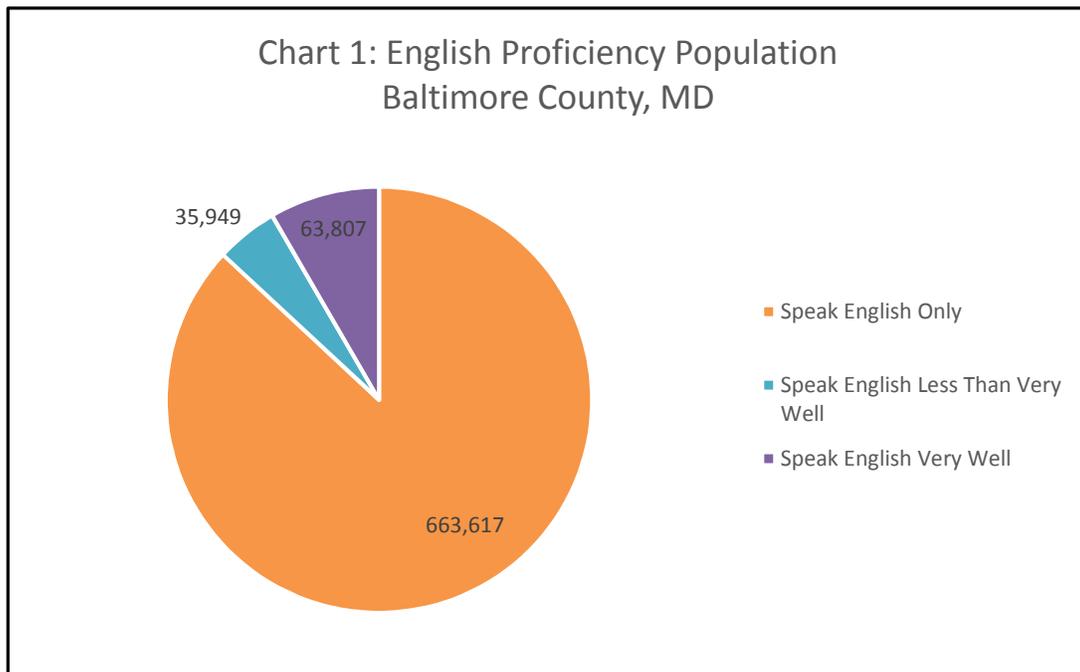
As directed by the Department of Justice (DOJ), in determining “reasonable steps” there are four factors to consider:

1. The number and proportion of LEP persons in the eligible service area;
2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

Following is an assessment of need in Baltimore County as it pertains to the mission of the Baltimore County Department of Planning:

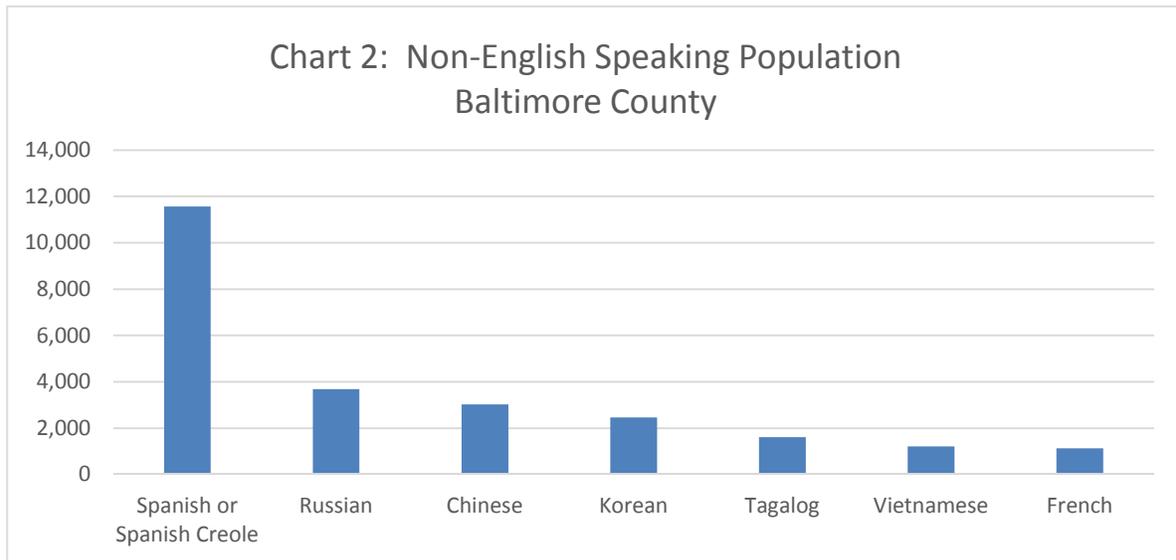
The Number and Proportion of LEP Persons Served or Encountered In the Eligible Service Area

¹According to the “Language Spoken At Home by Ability to Speak English for the Population 5 Years and Over” US Census Bureau American Community Survey 2009-2013 Five Year Estimates, there are approximately 763,373 persons in that category residing in Baltimore County; approximately 35,949 speak English “less than very well.” Languages other than English that are most likely to be encountered by employees of BCDP offices and the approximate number of those persons that speak English less than very well are Spanish 11,566, Russian 3,689, Chinese 3,022, Korean 2,463, Tagalog 1,618, Vietnamese 1,209 and French 1,133. All numbers and percentages are reasonable approximates.



Source: U.S. Census Bureau, ACS 2009 – 2013 5 Year Estimates.

¹ US Census Bureau American Community Survey 2009-2013 Five Year Average



Population maps are available on pages 11 thru 19

BCDP will periodically monitor the LEP population of those served by its various programs by reviewing quarterly reports submitted by grantees/services providers. If it is determined through review of the reports that other LEP groups are seeking benefits/services or are potentially eligible to receive benefits/services, BCDP will make the necessary changes on an as needed basis.

The Frequency with Which LEP Persons Come In Contact with the Program

Though currently comparatively small, the County’s growing LEP population increases the probability of an increase in LEP persons contact with BCDP. Due to the current size of the LEP population and the nature of services directly provided by BCDP, LEP interaction/contact is generally limited to a few programs within the Department of Planning. An April 2014 survey of BCDP staff revealed that direct requests for information/assistance from LEP individuals or families to BCDP are minimal.

The Importance of the Service Provided By the Program

Direct services and grants provide by BCDP to the public enables the agency to assist the County in affirmatively furthering fair housing as well as assist Baltimore County residents in activities that vary from acquiring affordable housing to modifying existing housing in order to age in place. BCDP uses Federal funds to operate its Housing Rehabilitation Program, Housing Accessibility Modification Program, HOME and Lead Remediation Program. The agency also awards federal grant funds to non-profit organizations and other county agencies that provide direct services to very low, low and moderate income households, including homeless persons, persons at risk of becoming homeless, first-time homebuyers, persons with disabilities, children, elderly and affordable housing development.

Further, the agency conducts compulsory activities such as applications and interviews prior to a clients' participation in the aforementioned programs.

BCDP facilitates opportunities for the public to comment on the use of federal funds in four major areas: a Consolidated Plan which helps shape the five-year priorities of the County as we assist and work with Baltimore County citizens to meet the needs of our neighborhoods; an annual Action Plan that shows how we plan to implement priorities in the coming year; the Analysis of Impediments to Fair Housing Choice that is a tool to assist the County in identifying any barriers to its effort to provide services and activities in a nondiscriminatory manner and to affirmatively further fair housing; the Consolidated Annual Performance and Evaluation Report that provides information to the public on the activities funded in a fiscal year and publication of a Development Guide for the development of affordable housing in Baltimore County. The outcomes of these plans and actions impact all residents. Affirmative efforts are made to educate the public and make the planning process as inclusive as possible.

BCDP will ensure opportunities for Limited English Proficient (LEP) individuals to participate in the affordable housing development process by way of written notifications to various community-based organizations that directly serve LEP families and individuals.

The Resources Available to Recipients

Because at this time the LEP population in the area is comparatively small, and the cost of translating the required program applications is relatively low, BCDP has determined that full translation of housing rehabilitation and lead abatement applications is appropriate and will be translated on an as needed basis.

BCDP contracted with Language Line Services; a professional language interpreting company to provide language interpretation services. Services are provided via telephone. Written document translation services will be provided by access to the State of Maryland's contracted services with Schreiber Translations, Inc. (STI). Schreiber Translations, Inc.² "offers precise, accurate and certified translations in any discipline, of any type of material from English into any language and any language into English." Additionally, BCDP awards funds to local community-based organizations that provide housing counseling, immigrant outreach and domestic violence counseling services to Spanish speaking LEP clients.

BCDP duplicates HUD "know Your Rights" and other fair housing publications and makes those publications available and easily accessible in the reception areas of BCDP's first and second floor offices.

BCDP has established a list of staff members that fluently speak/write foreign languages such as French, Portuguese, Chinese and Greek who voluntarily serve as on-call interpreters. Included on the list of volunteers is a staff member that provides American Standard Sign language. BCDP continues to seek staff volunteers that fluently speak/write Spanish, Russian, Korean, Vietnamese and Tagalog

Meeting the Requirements: BCDP Language Access Plan for Limited English Proficiency

Providing meaningful access to services to the diverse population within Baltimore County is important and therefore BCDP has completed the following assessment and plan for providing language assistance to the LEP population it serves.

2 www.schreibernet.com

All language access activities detailed below will be coordinated by the Division of Neighborhood Improvement in collaboration with Baltimore County Human Resources and BCDP executive staff.

Identifying LEP Individuals Who Need Language Assistance:

Baltimore County Department of Planning (BCDP) staff with direct public contact will utilize the Census Bureau's "What Language Do You Speak?" card which is translated into 38 different languages. The card is used by government and non-government agencies to identify the primary language of Limited English Proficient individuals during face to face contacts. The Census Bureau's Language Identification card can be downloaded free of charge at www.lep.gov/ISpeakCards2004.pdf. Enlarged "What Language Do You Speak?" cards will be conspicuously posted in the reception areas of BCDP offices.

Language Assistance Measures:

Language assistance will be provided for LEP individuals through the translation of vital key materials, as well as through oral language interpretation when necessary.

Translation of Written Materials:

Translation of all BCDP plans and materials is not possible due to cost restrictions and current population levels do not warrant such translations.

BCDP Web Site - Google Translation service is available at the web site. The service allows users to choose from English, Spanish, Russian, Arabic, French, and Chinese translations. Google Translation is available by clicking the link at the bottom right of each page of the BCDP web site.

Key Documents - An Executive Summary for the following key documents will be made available in Spanish on an as needed basis:

The Consolidated Plan (PDF) for 2012-2016

2013 Action Plan (final)

Development Guide

Other documents as necessary

Applications for the following services will be made available in Spanish, French, Russian, Korean, Tagalog and Vietnamese when necessary

Application for Housing Rehabilitation

Application for Housing Modification

Application for Lead Grant Funds

Outreach Materials:

Outreach materials in Spanish, Russian, Chinese, Korean, African Languages, Tagalog and Vietnamese will be produced when necessary and possible. BCDP will maintain a list of such materials and will honor requests to translate key outreach materials on an as needed basis.

Oral Language Services:

Language interpretation services will be provided free of charge to all Limited English Proficient (LEP) individuals.

In order to provide these services, BCDP will do the following:

Maintain a list of the points of contact where a LEP person interacts with BCDP. Key points of contact for LEP persons are the front-desk receptionists, Homeless Services, Housing Rehabilitation, Housing Accessibility Modification Disability and Lead Remediation Programs. As interaction with LEP persons increases, additional points of contact will be identified.

Identify and recruit staff who fluently speak and/or write a language other than English. In order to ensure equal access to program information and services and improve client communication, a diverse group of multi-lingual (including American Sign Language) BCDP staff have established the “ALL-TALK Language Bank” to serve as volunteer on-call interpreters. An inventory of staff’s foreign and Sign language capabilities has been established and will be maintained by BCDP.

Provide Direct Access to Professional Sources That Will Provide Oral Language Services:
BCDP has contracted with Language Line Services to provide oral interpretation services.

Provide Competent Translation of Key Documents:
BCDP has arranged (via the State of Maryland) to provide key document translation services to LEP clients. Services will be provided on an as needed basis by Schreiber Translations, Inc.

Document the occurrences and cost of services directly related to LEP and apply those costs to HUD eligible activity.

Staff Training:

In order to facilitate meaningful access to information and services for LEP individuals, BCDP employees (including those that do not interact directly/regularly with LEP clients) will participate in periodic sensitivity discussions. Such discussions will be conducted to ensure that all staff is fully aware of LEP policies and procedures and are effectively able to work in person, via internet and/or by telephone with LEP individuals. BCDP, in cooperation with Baltimore County’s Department of Human Resources will conduct periodic “Command Spanish for Office Personnel” courses, free of charge to all Baltimore County staff. Enrollment is voluntary. Continuation of non-English, second language classes for County staff on an annual basis are contingent upon the availability of funding.

Providing Notice of Available Language Service to Limited English Persons (LEP):

Baltimore County Department of Planning will utilize the following methods to inform Spanish- speaking Limited English Proficient individuals and supporting organizations about available free-of- charge LEP services:

Posting Signs:

An “Interpretation Services Available” sign will be conspicuously posted in the BCDP 1st and 2nd floor reception areas to notify LEP individuals of available translation and interpreting services.

Outreach Documents:

Key BCDP program outreach documents will include a notice that some language assistance services are available. This notice will be listed in both Spanish and English.

Community Organizations:

BCDP will advise groups to whom BCDP awards federal funds of their (the groups) obligation to provide meaningful access to Limited English Proficiency persons they serve or potentially may serve and to document such service for reporting.

Public Notices:

BCDP may periodically issue notices to local Spanish-language newspapers in the Baltimore Metropolitan and County Area about available LEP services.

In the future, BCDP may consider additional notification methods, including:

Radio announcements – Provide notices on area Spanish-language radio stations about available language assistance services and how to access them.

Community Presentations: Provide notices regarding program activities and services in Spanish to community associations.

Monitoring and Updating the LEP Plan:

BCDP Grants Administration will continue to monitor the services and number of the LEP population via review of quarterly reporting documents. Periodic reviews of BCDP's LAP may be conducted by BCDP executive staff, and, when necessary coincide with the public review of the Annual Action Plan, the Consolidated Annual Performance and Evaluation Report. BCDP will document its services to the LEP population and will make this information available during the review process.

Discrimination Policy:

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses Environmental Justice in minority and low-income populations. Presidential Executive Order 13166 addresses providing equal access to services and benefits to those individuals with Limited English Proficiency (LEP). The rights of women, the elderly and the disabled are protected under related statutes.

These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI:

Title VI prohibits the following actions for recipients of federal assistance. Recipients (hereinafter sometimes referred to as Recipient, Recipients, Sub recipients or Sub recipient) of federal assistance (directly or through grant/contractual means), on the grounds of race, color, or national origin shall not: Deny a person the chance to participate as a member of a planning or advisory body that is an integral part of the program.

Provide a service or benefit to an individual that is inferior (either in quantity or quality) to that provided to others in the program.

Provide an individual with a service or benefit in a manner different from others under the program.

Address an individual in a manner that denotes inferiority because of race, color, or national origin.

Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.

Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.

Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.

Require different standards or conditions as prerequisites for accepting an individual into a program.

Deny an individual any service or benefit provided under the program.

Use criteria or methods of administration which have the effect of subjecting individuals to discrimination or operate to defeat or substantially impair the accomplishment of the objectives of the program.

Permit discriminatory activity in a facility built in whole or in part with federal funds.

Fail to provide service or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English speaking ability.

Fail to advise the population eligible to be served or benefited by the program of the existence of the program.

Subject an individual to discriminatory employment practices under any federally funded program whose object is to provide employment.

Locate a facility in any way that would limit or impede access to a federally funded service or benefit.

Complaint Procedure:

As a recipient of federal financial assistance, Baltimore County Department of Planning (BCDP) will implement the following Title VI complaint procedure:

Submit complaint: Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation from Baltimore County Department of Planning administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. Such complaint must be filed within 60 calendar days after the date the person believes the discrimination occurred.

Submit written complaints to:

Director,
Department of Planning
105 W. Chesapeake Avenue, Suite 101
Towson, Maryland 21204
Phone: 410-887-3211
Email: planning@baltimorecountymd.gov

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as detailed as possible the facts and circumstances surrounding the claimed discrimination and shall include the following information:

- Name, address, and phone number of the Complainant.

A written statement of the complaint, including the following details:

- Basis of complaint (i.e., race, color, national origin or language, disability, religion, familial status, or retaliation).
- The nature of the incident that led the complainant to feel discrimination was a factor.
- A detailed explanation of the alleged discriminatory act(s).
- The date or dates on which the alleged discriminatory event or events occurred.
- If applicable, name(s) of alleged discriminating person(s).
- Other agencies (state, local or Federal) where the complaint is also being filed (optional).
- Complainant's signature and date.

Review and Response:

Upon receipt of the Complaint, the BCDP Director shall appoint one or more staff review officers (from a division different from the one named by complainants), as appropriate, to evaluate and investigate the complaint. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the BCDP's processes relative to Title VI, as appropriate.

The staff review officer(s) shall forward their recommendations to the BCDP Director, for concurrence. If the BCDP concurs, the BCDP Director shall issue the BCDP's written response to the Complainant. This response shall be issued no later than 30 calendar days after the date the BCDP Director received the Complaint. If more time is required, the BCDP Director shall notify the complainant of an estimated time frame for completing the review.

Appeal: The Complainant may appeal BCDP Director's response to the Complaint by submitting a written appeal to the BCDP Director no later than 15 calendar days after receipt of the BCDP Director's written response. A response to any appeals will be issued by the BCDP Director within 15 days of receipt.

If the individual/s still believe the complaint has not been resolved, he/she/they may request a decision from the:
Department of Human Resources Director/Deputy Director
308 Allegheny Avenue, Towson, Maryland 21204
Phone: 410-887-3135
Email: ggay@baltimorecountymd.gov

If the individual/s still believe the complaint has not been resolved, he/she/they may request a decision from the:
Human Relations Commission Executive Director
Drumcastle Government Center
6401 York Road, Suite 1013, Baltimore, Maryland 21212
Telephone: 410-887-5917
TDD: 410-339-7520
Fax: 410-887-6079
E-mail: bchrc@baltimorecountymd.gov

If the individual/s still believes the complaint has not been resolved, he/she may request a decision from the:
State of Maryland Civil Rights Commission
6 Saint Paul Street, Baltimore, Maryland 21202 Phone: 410-767-8600
Toll Free: 1-800-637-6247, Fax: 410-333-1841 Telephone Text (TTY) 410-333-1737

If the individual/s still believes the complaint has not been resolved, he/she may request a decision from the:
U.S. Justice Department
950 Pennsylvania Avenue, Washington DC, 20530-0001
Phone: 1-202-514-2000

The above listed order is suggested and is by no means required. Complainants are free to file discrimination complaints in whatever orders they so choose.

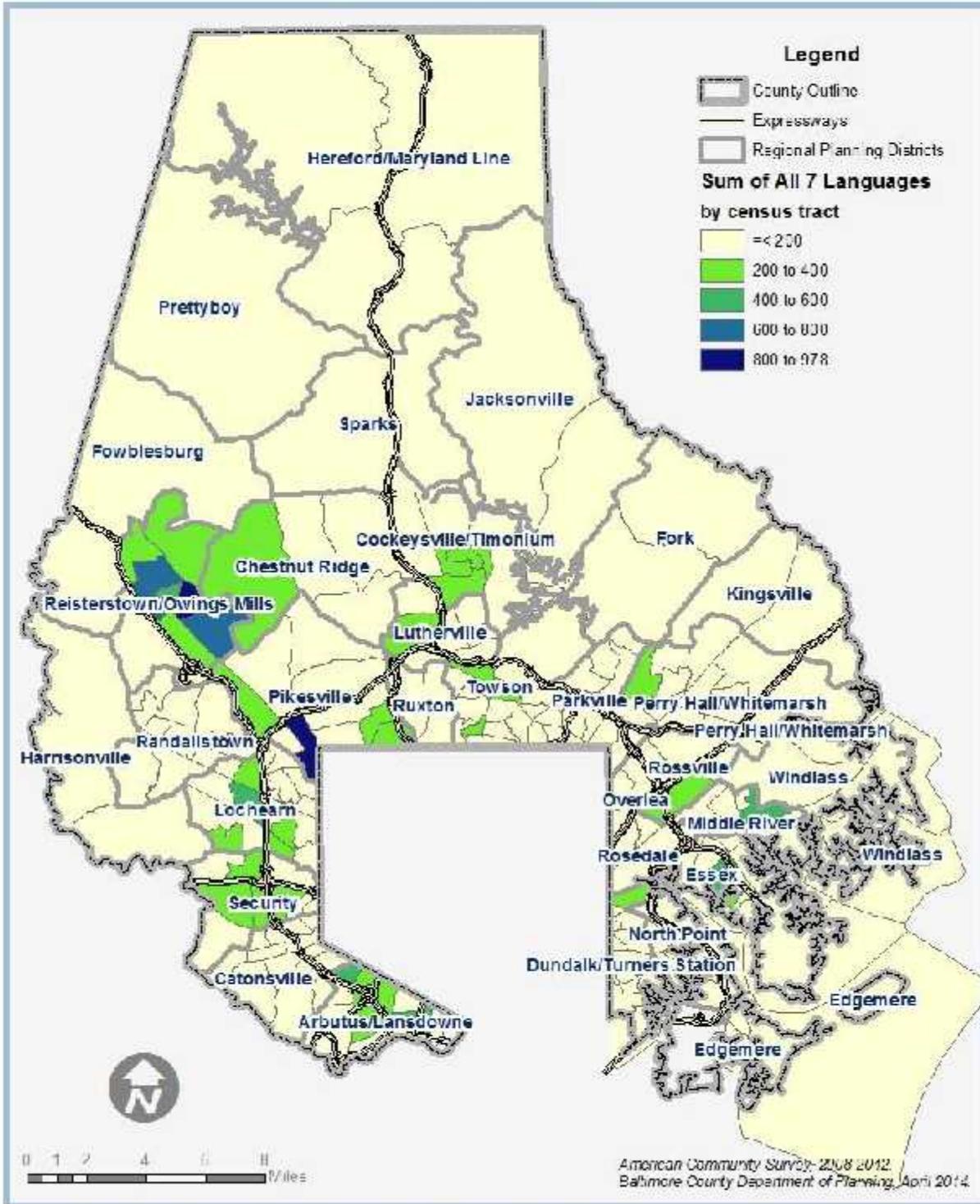
The intent of BCDP' Language Access Plan (LAP) is to ensure meaningful access to the planning process, program benefits and other related activities where it is determined that a substantial number of residents in the Baltimore County Region does not speak or read English proficiently. Interpretation at meetings or events will be provided to the degree that funding permits based on current laws and regulations.

Laws and Policies Guiding Language Access Plans for Limited English Proficiency

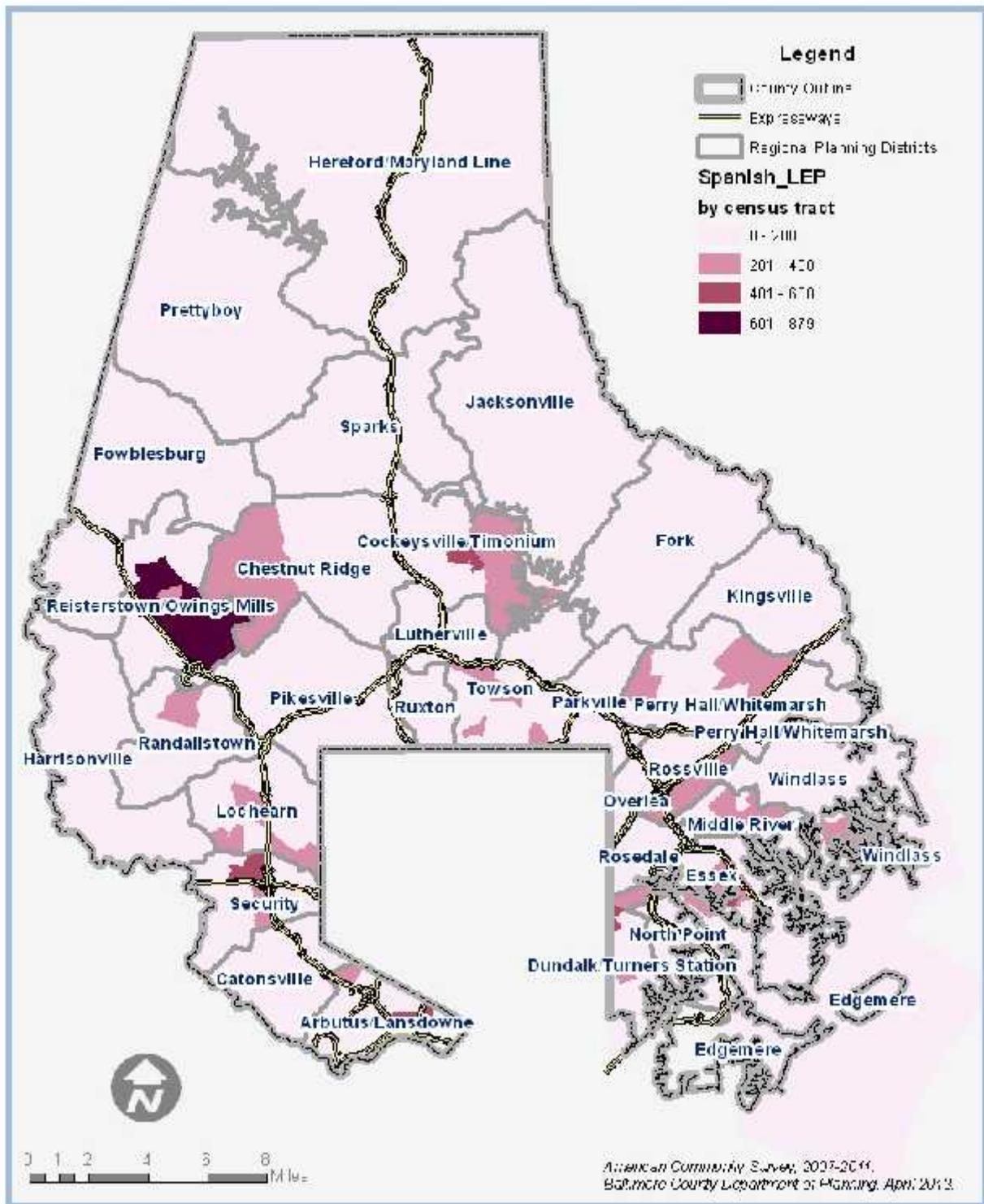
Title VI of the Civil Rights Act of 1964	Limited English Proficiency Executive Order 13166	MD Senate Bill 265 - Equal Access to Public Services for Individuals with Limited English Proficiency
Federal law	Federal policy	State law
Enacted in 1964	Signed August 2000	Effective July 2002
Considers all persons	Considers eligible population	Considers eligible population
Contains monitoring and oversight compliance review requirements	Contains monitoring and oversight requirements	Contains monitoring requirements and a timeline for implementation. BCDP -2012
Factor criteria is required, no numerical or percentage thresholds	Factor criteria is required, no numerical or percentage thresholds	Baltimore County Article 29 of the Baltimore County Code, 2003 bars discrimination because of race, color, creed, age, religion, sex (including harassment and pregnancy), physical or mental disability, national origin, marital status, sexual orientation, or gender identity or expression in the areas of employment, housing, public accommodations, education, or finance. Maryland state agencies, departments, and programs provide equal access to public services for individuals with limited English proficiency; Requires vital documents, such as applications and hearing notices, be translated into any language spoken by any LEP population that constitutes 3% of the overall population within a specified geographic area under specified circumstances.
Provides protection on the basis of race, color, and national origin	Provides protection on the basis of national origin	
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using factor criteria	
Annual Accomplishment and Upcoming Goals Report to HUD	Annual Accomplishment and Upcoming Goals Report to HUD	

Baltimore County Limited English Populations (People who speak a foreign language but do not speak English very well).

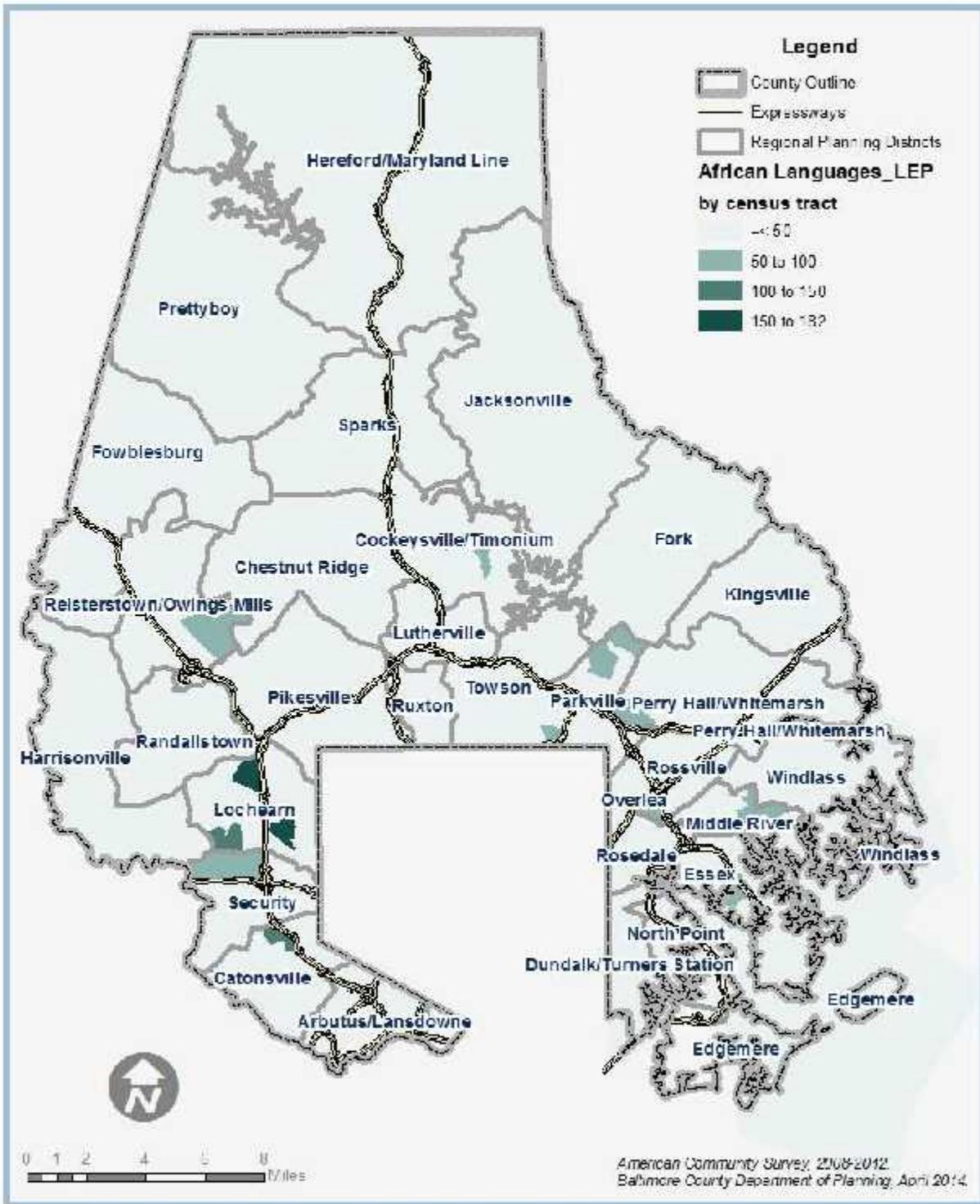
Geographic Distribution of Limited English Population (LEP): Top Seven Foreign Languages



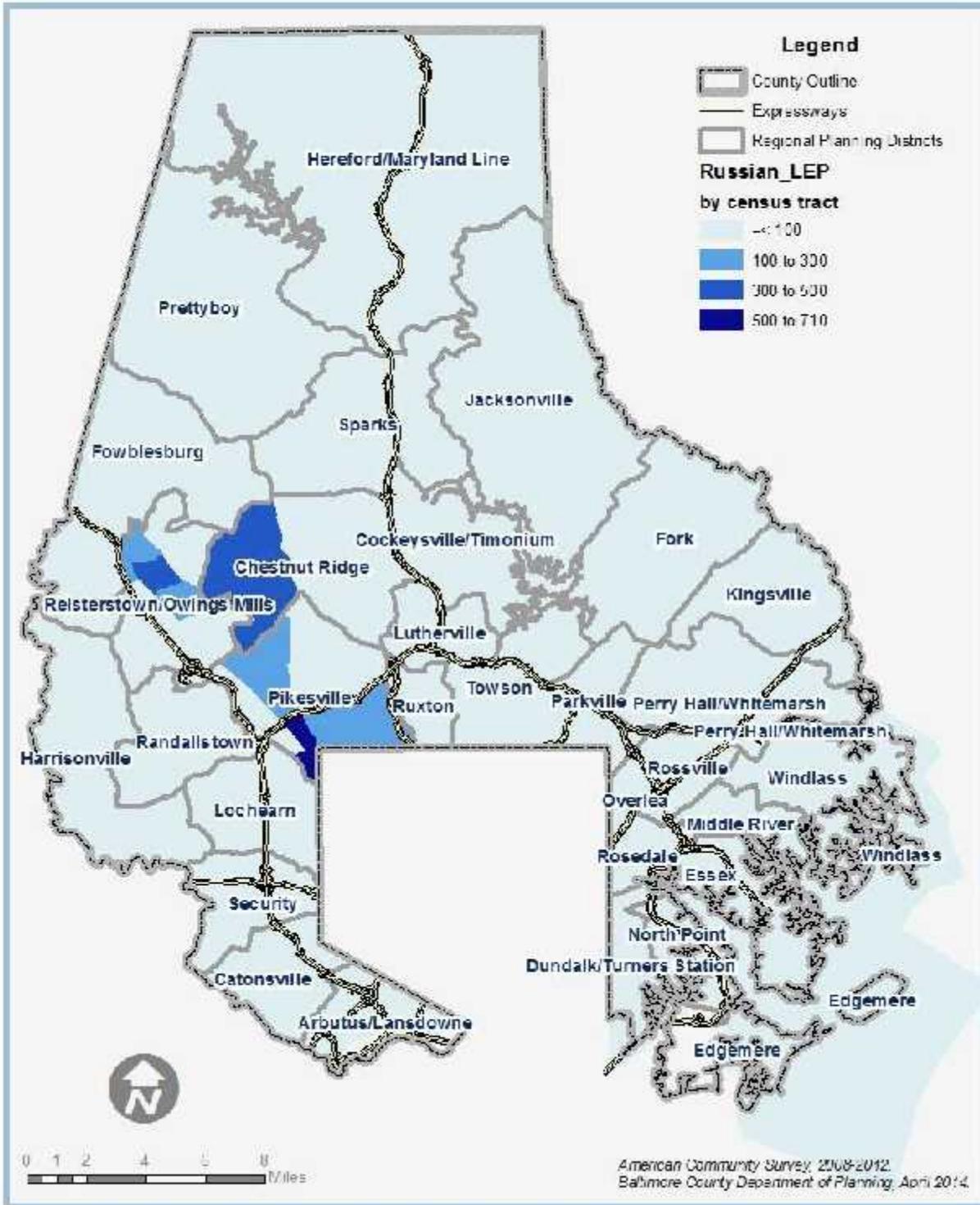
Geographic Distribution of Limited English Population (LEP): Spanish



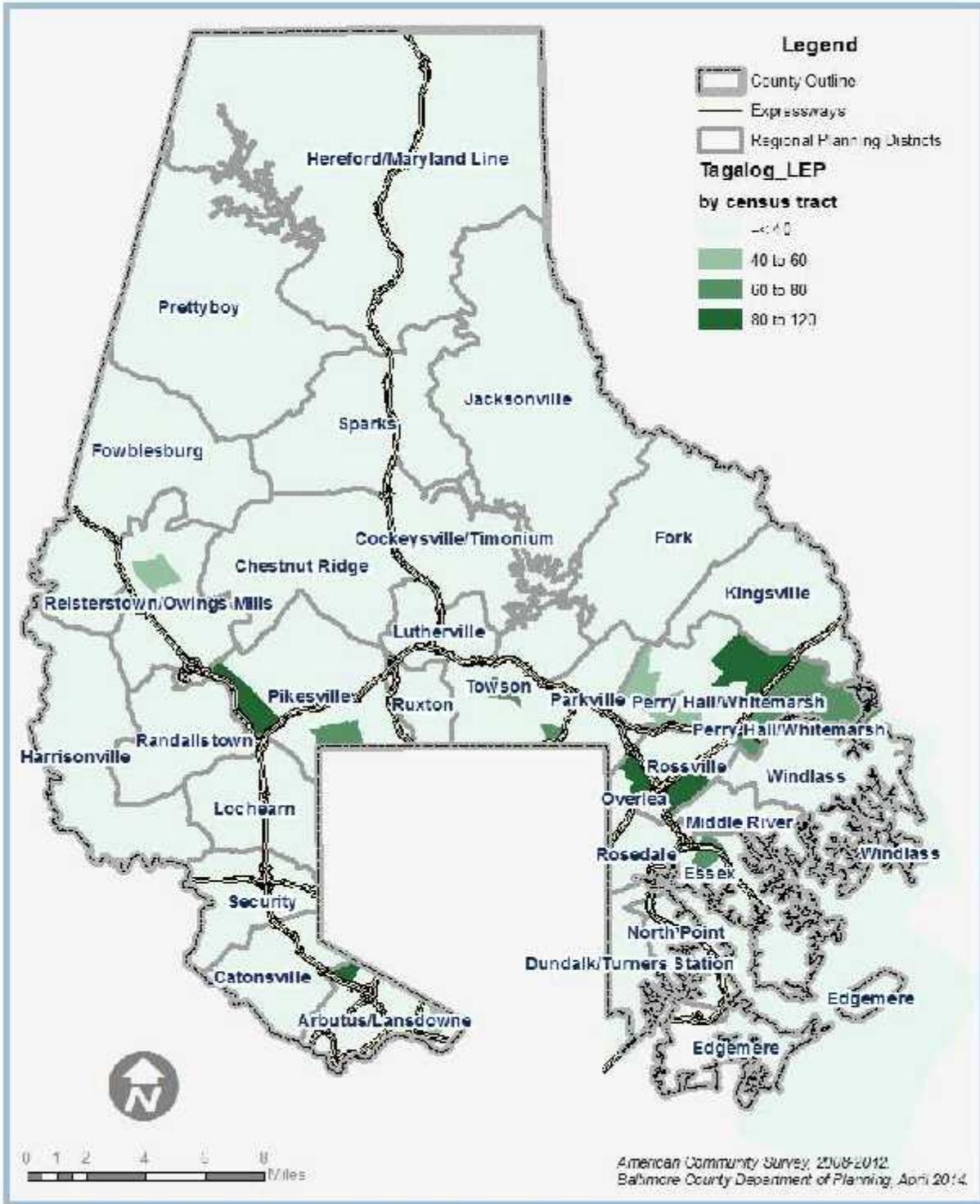
Geographic Distribution of Limited English Population (LEP): African Languages



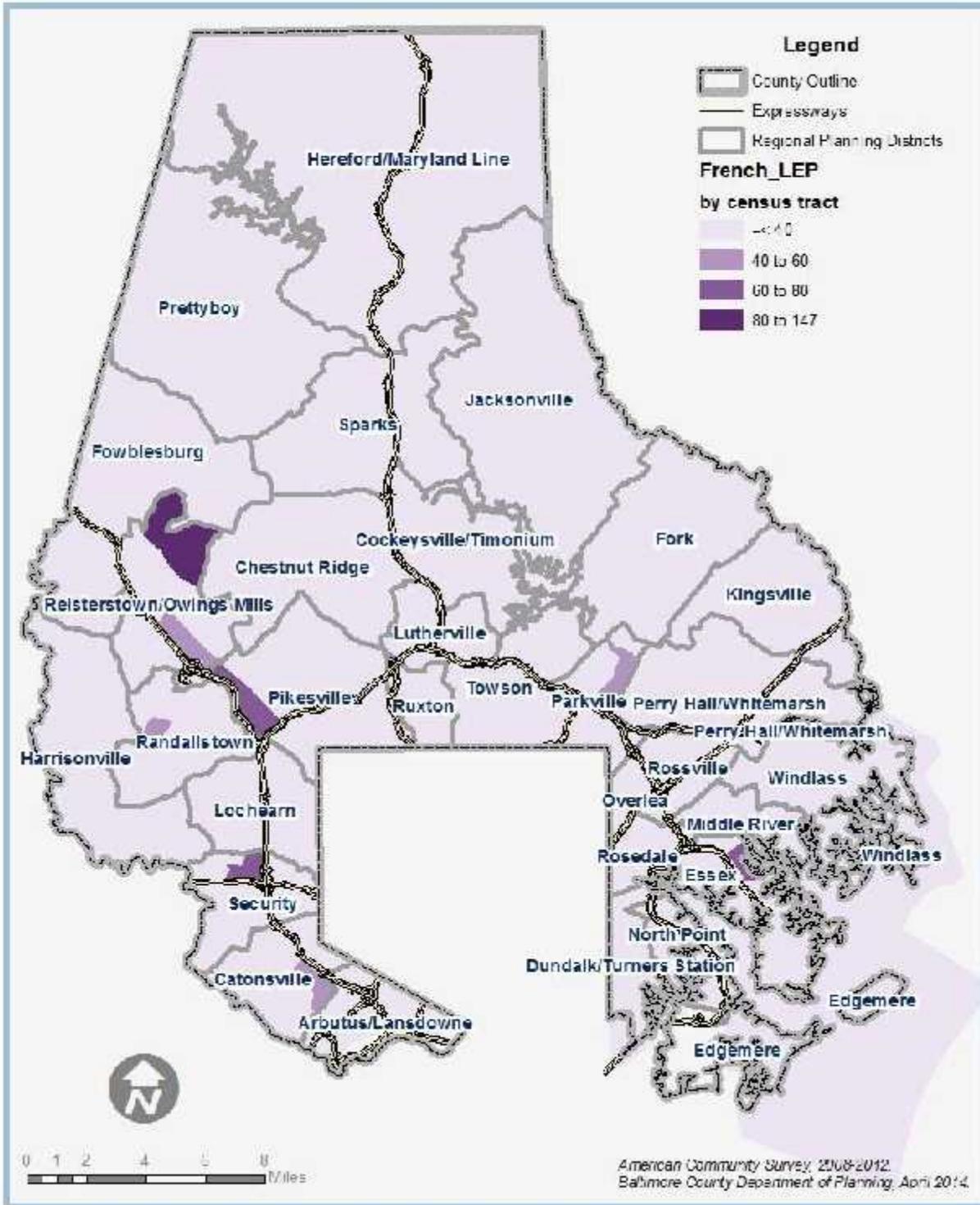
Geographic Distribution of Limited English Population (LEP): Russian



Geographic Distribution of Limited English Population (LEP): Tagalog



Geographic Distribution of Limited English Population (LEP): French



Geographic Distribution of Limited English Population (LEP): Korean

