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SAMPLE FOR DISCUSSION PURPOSES

PLANNING TOOL:

CONSIDERATIONS FOR CREATION OF A LANGUAGE ASSISTANCE POLICY AND IMPLEMENTATION PLAN FOR ADDRESSING LIMITED ENGLISH PROFICIENCY IN A DEPARTMENT OF CORRECTIONS

I. INTRODUCTION AND BACKGROUND

A. POLICY STATEMENT

Departments may want to consider creating a short policy statement that sets the tone and goal on language access in the agency. An example of what such a statement could potentially include is the following:

It is the policy of the _____ Department of Corrections [Sheriff's Department/Jail] ("the Department") to take reasonable steps to provide meaningful access to limited English proficient (LEP) individuals incarcerated, detained, or otherwise encountering Department facilities, programs, and activities. The policy is to ensure that language will not prevent staff from communicating effectively with LEP inmates, detainees, and others to ensure safe and orderly operations, and that limited English proficiency will not prevent inmates, detainees, or parolees from accessing important programs and information; understanding rules, participating in proceedings; or gaining eligibility for parole, probation, treatment programs, alternatives to revocation, or classifications.

B. WHO IS LIMITED ENGLISH PROFICIENT (LEP)?

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English.

- Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently.
- LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (e.g., medical information, eyewitness accounts, information elicited in an interrogation, etc.) in English.

C. BACKGROUND

- Federal law prohibits national origin discrimination and requires meaningful access to LEP persons, including inmates, in federal and federally assisted programs and activities.
- The task of maintaining order, ensuring a safe and secure correctional institution, and meeting corrections goals becomes extremely difficult when language barriers are not addressed.

D. PLANNING DOCUMENTS

Corrections officials have several planning documents they could choose to create.

- A general Policy could include the brief policy statement, as well as background information and as many specifics as appropriate for the agency. This policy statement could be the overarching document from which a management plan would flow.
- An Implementation Plan for managers could identify operational and management strategies and planning options for implementing the Policy. The Plan could be attached to the Policy once developed.
- Shorter directives [substitute policy guidance, general orders, or other types of direct communication with staff and managers regarding protocols and procedures, as appropriate for your Department] could be created to flow from the Plan. These directives could set forth clear expectations and procedures for staff and managers on how and when to access language service options. Where appropriate, different directives might be issued to cover different types of encounters, such as healthcare, discipline, intake, etc., so that staff responsible for the particular area have information specific to their duties.
- Language resource lists, signs, instructions on internal websites, training, videos, and other tips and tools could be created to help staff understand how and when to access and provide language assistance.

E. FRAMEWORK FOR DECIDING WHEN LANGUAGE SERVICES ARE NEEDED

The U.S. Department of Justice Limited English Proficiency Guidance for Recipients (DOJ LEP Guidance, or Guidance) sets forth a four-factor analysis for agencies to review when determining steps to take to communicate effectively with LEP individuals. The Guidance also provides examples of application of that analysis in corrections, particularly in Section B of the Appendix.

(<http://www.usdoj.gov/crt/cor/lep/DOJFinLEPFRJun182002.pdf>) Additional information and technical assistance tools can be found at <http://www.lep.gov> and could also be attached to an agency's Policy as reference tools.

Four-factor analysis:

1. The number or proportion of LEP persons or inmates in the Department overall and those that would be eligible, but for limited English proficiency or English proficiency prerequisites, for different aspects of the Department's and facilities' programs and activities, and the specific language needs of those individuals.
2. The frequency of contact that the different aspects of the agencies' programs and activities have with LEP persons, or would have if LEP persons were allowed access to those programs and activities.
3. The nature and importance of the various aspects of the Department's and facilities' programs and activities; and
4. The resources available to the Department, and costs associated with different language service options.

Departments should consider the extent that past use of English proficiency prerequisites has resulted in low numbers of LEP individuals in certain programs or facilities. In such instances, the number and proportion of LEP persons may not be representative of the eligible LEP population if meaningful access were provided. If this is the case, the Department should not rely on artificially low numbers of LEP persons encountered in those programs or facilities to limit language service options. The Department should take reasonable steps to ensure meaningful access to those and other programs, as detailed in the Policy and in the Plan.

As the DOJ LEP Guidance notes, the meaningful access requirement applies to all LEP persons encountered by the Department (whether adult inmates, detainees, juveniles, or persons involved in community corrections programs). Additional constitutional, federal or state statutory, or other requirements may apply to with regard to language services as well (such as in the case of LEP juveniles when greater rights to educational opportunities may be implicated), and should be coordinated with the Language Assistance Plan, where appropriate.

F. APPLICATION OF THE FOUR FACTORS

- The Department's Policy and/or Plan might include discussion of the four factors as applied to the Department. For example, breaking down the numbers and percentages of LEP inmates overall and in each facility, noting any trends or other information helpful to describe the linguistic characteristics of the inmate population, setting forth the nature and importance of particular types of encounters (see below for more detailed information on this point), and discussing resources available and costs associated with providing language services.
- The Policy could then reflect language service options and determinations by the Department of important areas for the provision of language services, based on the four-factor analysis. The Language Assistance Implementation Plan could provide detailed information on the protocols for accessing language services, translating vital documents, training, monitoring, and other specifics to implement the Policy.

II. DEFINITIONS

- **Primary Language** – The language in which an individual is most effectively able to communicate.
- **Interpretation** – The act of listening to a communication in one language and orally converting it into another language, while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training, and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.
- **Translation** – The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.
- **Bilingual** – The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.
- **Direct Communication** – Monolingual communication in a language other than English between a qualified bilingual Department employee or other bilingual person and an LEP individual (*e.g.*, Spanish to Spanish).

III. CONSIDER WHETHER THE DEPARTMENT SHOULD DESIGNATE A DEPARTMENT-LEVEL LEP COORDINATOR and FACILITY LEP MONITORS

A. LEP COORDINATOR – If a Department decides to assign an LEP Coordinator who reports to the head of the agency or some other high-ranking official, some of the responsibilities of that position could be, for example, to:

- Coordinate identification of language service needs and strategies for responding to those needs.
- Ensure identification and securing of existing and needed resources (in-house, new hires contract, resource sharing with other agencies, volunteers, or other) to provide oral and written language services.
- Identify and develop or recommend Directives/general orders to implement the Plan.
- Identify criteria for designation of languages for initial round of translation, based on demographic data and usage projections;
- Create systems to distribute translated documents, post electronically, and maintain supply;
- Identify training needs and provide for training to facility LEP Monitors, staff, and managers needing to use language services, as well as language service providers.
- Establish protocols for ensuring quality, timeliness, cost-effectiveness, and appropriate levels of confidentiality in translations, interpretation, and bilingual staff communications.
- Identify and implement a system for receiving and responding to complaints by staff, inmates, or others of ineffective language assistance measures.
- Exchange promising practices information with other departments, law enforcement, and other organizations, and amongst facilities.
- Establish a system to coordinate with the courts and jail so that inmate language needs are identified and responded to as early as possible.
- Review the progress of the Department and facilities in providing meaningful access to LEP persons, develop reports, and modify [recommend modification to] the Plan and implementing Directives/orders, as appropriate.

The Plan and Directives should set forth the name and contact information of the LEP Coordinator, if the Department chooses to assign one.

B. FACILITY LEP MONITORS – In addition, some Departments may choose to assign LEP Monitors at the facility-level. If so, LEP Facility Monitor duties could be, for example, to:

- Work with the LEP Coordinator to identify needs and strategies for meeting those needs so that staff will have access to appropriate language services in their interactions with inmates.
- Ensure the facility’s compliance with the LEP Policy and Plan, including any Directives/orders.
- Provide training to facility staff on implementation of LEP Plan and Directives.
- Establish and maintain the facility’s language assistance resource list, ensuring competency; revise the list as needed.
- Maintain data on selected interactions with LEP persons and provide reports to management and the LEP Coordinator, as appropriate.

The Plan and Directives should set forth the name and contact information of the Facility Monitors, if the Department chooses to assign them.

IV. LANGUAGE ASSISTANCE OPTIONS

In general, the following options should be considered in planning for providing language services:

A. ORAL LANGUAGE SERVICES

1. Direct Communication with LEP Individuals by Bilingual Staff

- Often, the most efficient and cost-effective method for communicating with LEP individuals is direct communication through qualified bilingual employees fluent both in English and the LEP person's language.
- Consider taking the following steps to ensure accurate communications:
 - Creating written standards and adopting assessments for qualifying Department employees as bilingual.
 - Assessing fluency in both languages and in the terminology used by the Department prior to designating a staff member as bilingual. A person may be able to convey simple instructions or hold conversations in an LEP individual's primary language, but not be sufficiently proficient in that language to perform more complicated tasks such as conducting interrogations, taking statements, collecting evidence, or conveying rights or responsibilities. These individuals are not yet "bilingual."
 - Providing initial and periodic training to bilingual employees on their role in direct bilingual communication, code of conduct for bilingual communications, and law enforcement terminology in other languages.
- Consider taking the following steps to improve effective utilization of bilingual officers:
 - Maintaining a directory of all qualified bilingual employees, including a list of the non-English language(s) they speak and their contact information, assignments, shifts, etc.
 - Recruiting bilingual staff and considering pay differentials or other forms of recognition for employees who do "double duty" as qualified bilingual employees.
 - Considering bilingual capabilities and language assistance needs of the inmate population and other communities encountered by the department.

2. Interpretation

When language services are needed, the Department should use qualified interpretation services when a non-bilingual employee/correctional officer needs to communicate with an LEP person or *vice versa*, when qualified bilingual employees are unavailable or *en route*, and when available bilingual employees lack the skills, rank, or assignment to provide direct communication services.

a. Options to consider include:

- Staff interpreters (trained and qualified) who are employed by the Department exclusively to perform interpretation services.
- Contract in-person interpreters, such as state and federal court interpreters, among others.

- Contract telephonic interpreters who provide interpretation according to Department guidelines. The language assistance implementation plan could set forth telephonic interpretation options, and how to access them, including use of telephonic or radio equipment to:
 - Access employees, interpreters from other agencies, or others who have been qualified as interpreters by the Department.
 - Access commercial telephonic interpretation services. The Plan will set forth information on access codes and assurances of quality control for such services.

- Interpreters from other agencies with which the Department has a resource-sharing or other formal arrangement to interpret according to Departmental guidelines.

- Interpreters who also serve as bilingual sworn correctional officers or employees and have undergone training and passed Departmental language proficiency assessments and rigorous training to serve dual roles as officers/civilian employees and interpreters.
 - A bilingual person may be sufficiently proficient in English and a foreign language to have direct monolingual conversations in that foreign language with an LEP individual, but not sufficiently proficient to convert orally what is said in the foreign language back into English. Likewise, the person may be perfectly fluent in both languages, but unskilled in interpreting and untrained in the various modes of interpretation and appropriate use of those modes (simultaneous, consecutive, sight).
 - Consider creating written standards for assessing and qualifying bilingual Department employees as interpreters, and provide or secure training for qualified employees on the role of a Department interpreter, the modes of interpretation, the code of conduct for interpretation, and the use of law enforcement terminology in other languages.

- Volunteer interpreters who have undergone training and meet Departmental language proficiency standards, and have formal arrangements with the Department to perform interpretation services.

- Inmates, their family members, or unqualified volunteers should not be used for interpretation, especially for communications involving medical, psychological, or other privileged information, investigations and disciplinary procedures, collection of evidence, or other sensitive situations, except temporarily in unforeseen, emergency circumstances while awaiting professional interpretation or bilingual correctional officers.

b. Choosing Between Telephonic and In-Person Interpretation

- When interpretation is needed, in-person interpreters may be preferred (Department employees or contract) for lengthy interactions and interactions with significant potential consequences to the LEP person, such as disciplinary or grievance proceeding, parole hearings, interrogations, medical and mental health appointments.
- In general, when interpretation is needed, telephonic interpretation services are most appropriate for brief encounters, situations in which no qualified in-person interpreter is available, while awaiting a qualified in-person interpreter, and during telephone conversations with LEP persons.

B. WRITTEN LANGUAGE SERVICES

1. General Forms and Documents.

Using the four-factor analysis, the Department should translate the vital written materials into languages of frequently-encountered LEP groups (considering literacy of LEP populations in their language). Vital information from those documents should be interpreted when translations are not available for LEP or when oral communication is more effective, such as in the case of LEP individuals whose primary language is traditionally an oral one.

The Plan could set forth the documents to be translated, including languages and timeframes for such translations. For instance, the Department could consider the following format and types of documents for translations of general materials:

FORMS/DOCUMENTS – fill in appropriate identifying information	Languages	Timeframe
Intake and evaluation forms:		
Inmate orientation or rule book materials		
Documents relating to classification:		
Inmate medical consent, treatment requests, or other health care-related forms:		
Documents relating to disciplinary or administrative proceedings:		
Inmate waiver forms:		
Inmate complaint or grievance forms:		

Inmate forms for participation in counseling, vocational, work, or educational programs:		
Inmate request forms, such as those relating to diet or religion:		
Visitation forms for family and public visitors:		
Notices and posters containing important information and/or rules:		
Community corrections documents, such as notices of alleged violations, sentencing/release orders, conditions of parole, victim impact statement questionnaires, grievance procedures, etc.:		

- **Obtaining Translations:** The Plan could set forth the procedures for obtaining the initial translations, and directives could tell staff how and when to access these translations, as well as how to request additional translations.
- **Quality Control:** The Plan could set forth a quality control protocol, such as assuring initial translations and second checks by qualified individuals.
- **Updating:** The Plan could set forth steps to consider demographic changes, new information/documents, or modifications to existing documents, leading to the need for additional translations.

2. Written Documents Containing Information Specific to Particular Inmates

- a. The Department should take reasonable steps to ensure document translation and meaningful communication.
- b. The more significant the communication to the LEP person, the greater the need to ensure competent and timely translations.
- c. When translations are not possible or reasonable, important information should be conveyed verbally in the relevant language. Taglines or signage in the appropriate languages could inform individuals how to receive oral language assistance to understand the contents of document.
- d. The department should take care to provide translation of important information consistent with this policy to the extent such written communication would be made available to English proficient inmates. For example, the following types of documents might be considered for this approach:

1. Medical prescriptions and orders.
 2. Disciplinary notices, rulings, findings, etc.
 3. Parole and probation decisions/findings.
 4. The content of forms filled out by LEP inmates.
- e. The Plan and/or implementing Directives should set forth qualified translation services (not inmates) to provide translations of documents containing information specific to a particular LEP inmate or group of inmates. They should also include quality control/second check measures and measures to ensure confidentiality and the avoidance of conflicts of interest. Further, they could include information on what to do when translations are not feasible or reasonable and oral communication of the information is more appropriate.

C. DECIDING WHICH LANGUAGE SERVICE OPTIONS TO USE

1. Fact-dependent decision.

The types of language assistance resources the Department decides to use will depend on the four-factor analysis and may be different in different types of activities and at each facility. For instance, direct services in a non-English language by bilingual staff or hiring a staff interpreter may be cost-effective ways to respond to many language needs where there are large numbers of LEP speakers of a particular language. For more rarely-encountered languages, telephonic or contract interpretation may be a preferred option.

2. Quality Control

The Plan and Directives flowing from the Policy should include, where appropriate, consideration of strategies to ensure quality control measures such as:

- Assessment and training for bilingual direct service staff.
- Interpreter quality control, ensuring that individuals used as interpreters are trained in the skill of interpreting (role, code of conduct, modes of interpretation, expectations of confidentiality, specialized terminology, etc.), are able accurately to convey information, including special terminology, in the appropriate languages, and are evaluated and monitored.
- Second-check systems for translations.
- Training and continuing skills improvement on all of the above.
- Limiting use of inmates and visitors to interpret to unforeseeable emergencies while awaiting proper interpretation or to situations in which the Policy and four-factor analysis would not result in the need for the Department to provide language services.
- Limiting use of inmates to translate written documents to general forms and other documents that are not specific to a particular inmate and do not contain any personal or confidential information, and assuring professional quality control.

V. PERSONNEL/HUMAN RESOURCE PLANNING

The Language Assistance Plan for management could include planning on personnel and human resource matters, such as:

- Consideration of language needs and inclusion of second language skills in recruitment, hiring, and promotion plans and criteria.

- Consideration of pay differentials for bilingual/interpreter staff.
- Tracking composition of staff by language ability.
- Promoting language sensitive deployment of bilingual staff and interpreters to match skills with needs.
- Providing training opportunities to improve existing language skills for staff.

The Plan should include name and contact information for persons responsible for implementing these measures, as appropriate.

VI. APPLICATION IN CONTRACTED FACILITIES

As discussed in Section B of the Appendix to the DOJ LEP guidance, Departments receiving federal financial assistance are ultimately responsible for ensuring that LEP inmates have meaningful access within a prison run by a private or other entity with which the department has entered into a contract. The management plan should consider whether to provide the staff and materials necessary to meet language services needs or to require the entity with which there is a contract to provide the services as part of the contract. Contracts and directives can provide specific information on responsibilities assigned.

VII. SPECIFIC ENCOUNTERS THAT MAY CALL FOR SPECIFIC POLICIES, PLANNING, AND DIRECTIVES

As noted in Section B of the Appendix to the DOJ LEP Guidance, a Department may find, after conducting the four-factor analysis, that there are specific types of encounters with LEP persons, or specific programs or activities, that need particular attention for planning purposes and for providing instructions to staff.

Examples of some of those activities and encounters which could be considered for prioritized attention and planning include:

A. INTAKE

1. Assessment and Evaluation.

The Department could consider the following steps in determining an LEP inmate's primary language and literacy level:

- Identifying LEP persons and their primary language at initial assessment:
 - Using language identification cards or other effective means to determine the inmate's primary language.
 - Considering the language the person spoke at home.
 - Considering whether there was a need for an interpreter in court or jail.
 - Using a bilingual person or interpreter proficient in the inmate's language to conduct the initial intake.
- Using a more thorough evaluation. Because initial screenings may be over-inclusive (*e.g.*, a person may speak a particular language at home but still be fluent in English) or under-inclusive (an inmate may be able to answer simple questions and understand simple instructions, but not be proficient enough in English to communicate, for instance, in a medical situation), a more thorough evaluation using a language assessment tool can assist in identifying the language proficiency level, orally and in writing, and therefore the language services needs of the particular inmate.

- Including information in the Plan regarding identification and assessments, including identifying responsible officials, as appropriate.
- Issuing directives to staff involved in intake to provide specific instructions for implementing the Plan.
- Setting forth, in the Plan and Directives, staff responsible and mechanisms for ensuring that each LEP inmate's language assistance requirements are in the inmate file and in inmate and institutional databases.

2. Orientation.

Consider how inmates will receive information they understand regarding the following:

- Institution rules and regulations.
- Notice to inmates on programs or services available and how to request them, including educational, vocational, training, medical, substance abuse, accommodations, religious services, or therapy.
- Language services available to LEP inmates.
- Written materials available to LEP inmates.

The Plan could set forth implementation strategies and responsible officials, while the Directives could provide specific instructions for staff involved in orientation.

B. CLASSIFICATION

Consider taking steps to avoid the following:

- Classifying or housing an inmate to his or her detriment due to limited English proficiency.
- Disqualifying an inmate, because of limited English proficiency, from important programs or services, including, for example, alternatives to incarceration and educational or treatment programs necessary to improve classification or obtain parole (*e.g.*, the Department will not exclude a LEP person from a treatment program based on English proficiency prerequisites).

Consider including in the Plan and any Directives information about how the above can be avoided and who is responsible.

C. HEALTH CARE, MEDICAL (INCLUDING MENTAL HEALTH AND DENTAL)

Consider the following:

- Using bilingual medical staff or interpreters (staff or contract) with specialized training in medical terminology.
- Translating or interpreting vital medical forms, notices, procedures, diagnoses, conclusions, and instructions available to non-LEP inmates.
- Assuring privacy and confidentiality according to system guidelines applicable to English proficient inmates.

- Including in the Plan and appropriate Directives what steps will be instituted in terms of the provision of language assistance in the health care (including mental health and dental) setting, and who is responsible.

D. ADMINISTRATIVE ACTIONS – DISCIPLINE, PAROLE, HEARINGS, ALTERNATIVES TO REVOCATION, PROGRAM REVIEW

Consider the following:

- Providing interpretation and translations so that the LEP person has a meaningful opportunity to understand and participate effectively in the proceedings.
- Translating or interpreting materials or findings made available to non-LEP inmates.
- Not using other inmates to provide translations or interpretation in this context.
- Providing LEP persons with the same parole opportunities and alternatives to revocation as similarly-situated English proficient persons.
- Including in the Plan and appropriate Directives what steps will be instituted in terms of the provision of language assistance in the discipline, parole, hearings, alternatives to revocation, and program review settings, and who is responsible.

E. ELIGIBILITY FOR INSTITUTIONAL PROGRAMS AND SERVICES

Consider the following:

- Taking reasonable steps to ensure that job training and educational programs, or reasonable alternatives (offering same or similar opportunities), are available to LEP inmates;
- Avoiding situations in which inability to participate in programs due to LEP status adversely impacts LEP inmates.
- Avoiding situations in which treatment programs and programs necessary to be eligible for parole or preferable classifications should be withheld on account of limited English proficiency.
- The role of English-as-a-Second Language in planning. Teaching English is an important strategy for ensuring access (as well as opportunity) in the long run. However, it is not a language access plan. The Department will not delay access to important programs (particularly those that would improve chances of parole, probation, or classifications) until an LEP person learns English well enough to participate without language assistance.
- Including in the Plan and appropriate Directives what steps will be instituted in terms of the provision of language assistance regarding eligibility for institutional programs and services, and who is responsible.

F. COMMUNITY CORRECTIONS PROGRAMS AND SERVICES

Consider the following with regard to the provision of language services to provide access to:

- Explanations of conditions of probation/release.
- Development of case plans.
- Setting up referrals for services.
- Supervision contacts.
- Outlining violations of probations/parole and recommendations.
- Interviews with the offender, victim, family members, or others.
- Treatment and other types of programs that allow offenders to remain safely in the community.
- Contracted community-based programming and supervision.

G. VISITATION

Consider the following:

- Providing translated visitation forms for inmates and visitors in most frequently-encountered languages;
- Posting visitation rules in most frequently encountered languages of LEP visitors.
- Ensuring that staff knows how to handle situations involving LEP visitors.
- Including in the Plan and appropriate Directives what steps will be instituted in terms of the provision of language assistance in the context of visitations, and who is responsible.

H. JUVENILE FACILITIES

- Departments responsible for juvenile facilities and programs, and those facilities and programs, should consider any additional language assistance needs that may be raised by the status of juveniles, such as, for example: mandatory education requirements; differences between adult and juvenile programs; and parental contact and information issues (including communications with LEP parents), etc.

VIII. TRAINING

Training is critical so that staff understand how to access language services, and so that those staff involved in actually providing the language services are competent to do so. Consider the following:

- Initial and periodic training for staff coming into contact with LEP persons, as well as managers and those in charge of classifications, program, treatment eligibility, medical, disciplinary, or any other aspect of this policy, on the Policy, Plan, and Directives.
- Including training on the Policy and implementing Plans, Directives, and tools in new employee orientation.
- Providing training to staff, contract interpreters, shared interpreter resources from other agencies, and community volunteers who may provide oral or written language assistance services for LEP persons on how and when it is appropriate for them to do so, confidentiality and conflict of interest requirements, necessary terminology, language skills development, and other important guidelines.
- Including in the Plan and appropriate Directives what steps will be instituted in terms of staff training, and who is responsible.

IX. LEP PROGRAM MATERIAL

Consider keeping updated copies of the LEP Policy, the Plan, Directives (or the equivalent), training opportunities, and other information and tools for ensuring language access in a central location and distributing or otherwise making them easily accessible.

X. FACILITY LANGUAGE ASSISTANCE RESOURCE LISTS

Consider creating and distributing facility language assistance resource lists, such as, for example:

- Instructions for handling emergency situations, including radio protocols for accessing language services.
- Procedures for providing language assistance, including instructions on how to work with interpreters.

- Location of language identification flash cards.
- Contact, shift, and language information for staff interpreters.
- Contact, on-call availability, and language information for contract interpreters.
- Contact numbers and language information for telephonic interpretation.
- Contact, shift, and language information for bilingual staff and officers.
- Contact, availability, and language information on community volunteers whose qualifications have been evaluated and who have been trained in confidentiality issues.
- Location and list of translated materials available for inmates and visitors.
- For obtaining additional written translations, instructions for identifying appropriate translator and ensuring quality control.

Consider including in the Plan and/or Directives a timeframe and identification of who is responsible for maintaining and distributing such resources.

XI. SIGNS IN INMATE, VISITOR, AND STAFF AREAS

Consider:

- Posting signs in inmate and visitor areas that detail important information in languages most frequently encountered.
- Posting signs in staff areas on how staff can access language services.
- Including in the Plan and/or Directives a timeframe and identification of who is responsible for posting such signs.

XII. MONITORING

Consider the following:

- Setting forth clear expectations for staff and managers regarding language assistance.
- Implementing a system to monitor effectiveness of the Plan and its implementation.
- Seeking feedback on the quality and effectiveness of the language service resources available and utilized by staff.
- Reviewing programs, the linguistic demographics of the inmate population, and the language resources available in an ongoing fashion, and more formally at least once per year (or as appropriate), and make adjustments as necessary and appropriate to ensure meaningful access and to reflect improved approaches to providing language access.
- Including in the Plan and/or Directives information on how monitoring will take place and who is responsible for it.

Departments of Corrections, Jails, and Sheriff's Departments are encouraged to copy this document and modify it as appropriate to meet the needs of the particular Department or facility. Additional information and tools can be found at <http://www.lep.gov>. Comments and recommendations are welcome. Please send them to: Coordination and Review Section, LEP Initiative, Civil Rights Division, U.S. Department of Justice, 950 Pennsylvania Ave., NW, NYA Bldg., Washington, DC 20530