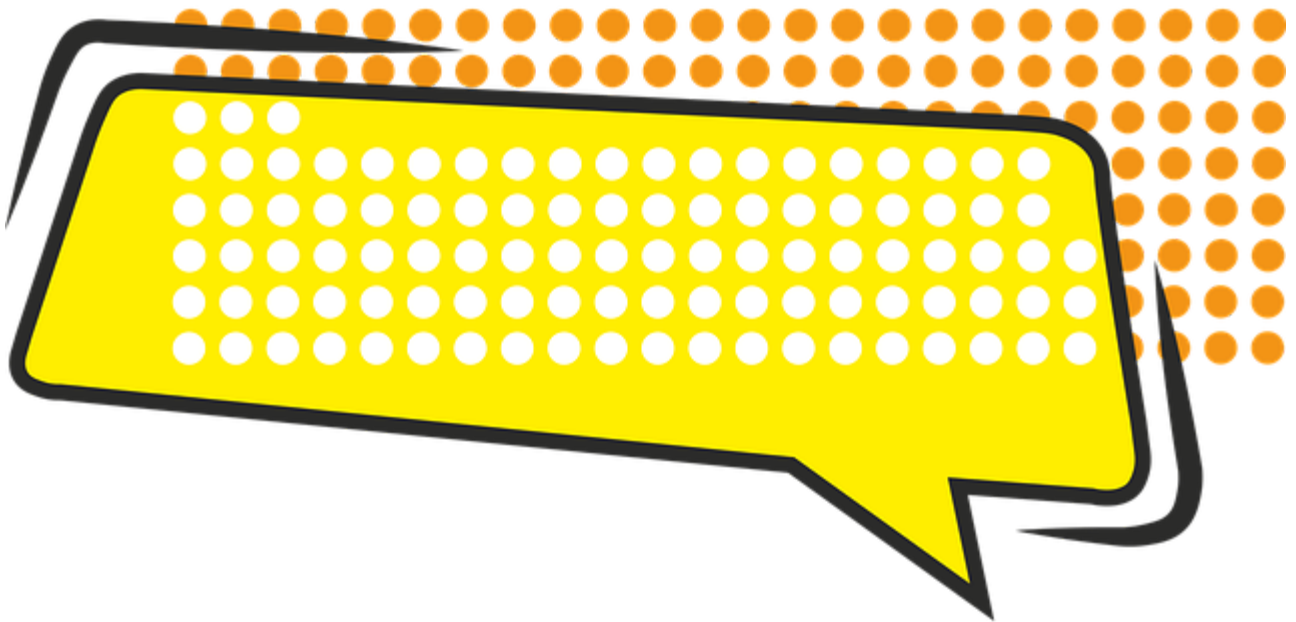




**INSTITUTE OF AGRICULTURE,
NATURAL RESOURCES & EXTENSION**

University of Alaska Fairbanks

Fall 2020-2025 Language Access Plan



Updated October 2021 by Alda Norris, PhD
Evaluation Specialist & Civil Rights Compliance Coordinator
IANRE Director's Office

Acknowledgements

IANRE would like to extend its gratitude to the following organizations:

University of Wisconsin-Extension for sharing their Language Access Plan (LAP) with us as an exemplar. [Their 2018 document](#) was consulted as a model for IANRE's LAP.

Alaska's Department of Transportation (DOT) for publicly posting their LAP. [Their 2018 document](#) was consulted as a model for IANRE's LAP.

Anchorage Public Library for publicly posting their LAP. [Their 2018 document](#) was also consulted as a model for IANRE's LAP.

Finally, we would like to thank the equal opportunity specialists at the National Institute of Food and Agriculture (NIFA) for providing a technical assistance webinar related to Limited English Proficiency (LEP) and constructing an LAP.



Table of Contents

I. Introduction	pp. 4-5
A. Our Values	
B. Legal Basis for Plan	
C. Policies and Procedures	
D. Key Definitions	
II. Access Standards	pp. 6-7
A. Four-Factor Analysis	
B. Interpreter & Translator Competence	
C. Addressing Complaints	
III. LEP Needs Assessment	pp. 8-9
A. Request Logs	
B. Alaska LEP Data Sources	
C. Languages by Service Area	
IV. Budgeting for Access	pp. 9-10
A. Interpretation Costs	
B. Translation Costs	
C. Grant Budgeting Tips	
V. Access Resources	p. 10
A. I-Speak Cards	
B. Alaska Talent Pools	
C. Interpreting for Zoom	
D. Translation Project Management	
VI. Appendices	pp. 11-12
A. Blank IANRE LEP Requests and Actions Log	
B. Inventory of IANRE LEP R&A Log Entries	

I. Introduction

The purpose of this document is to provide IANRE employees and volunteers with guidance on meeting our civil rights obligations relating to serving individuals with limited proficiency in speaking and/or writing of the English language.

A. Our Values

The Institute of Agriculture, Natural Resources and Extension (IANRE) celebrates the rich diversity of its students, employees, volunteers and participants and is committed to providing workplaces and programming free of discrimination. Our faculty and staff strive to provide research-based information and educational opportunities to people of all backgrounds and abilities across Alaska.

B. Legal Basis for Plan

This document is consistent with DOJ Recipient LEP Guidance issued pursuant to [Executive Order 13166](#). In short, “The Department of Justice (DOJ) adopts final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” (2002). As a recipient of federal financial assistance, IANRE recognizes its obligation to provide programs and services in a nondiscriminatory manner.

C. Policies and Procedures

As explained in IANRE’s 5-Year Civil Rights Performance Plan, Objective 4:

If employees are unable to communicate with a customer, employees will provide the customer with a tool like a [language menu](#) to indicate the customer’s primary language, which can then be conveyed to a phone-based interpreter.

Each office will maintain an LEP Requests and Actions Log that will be required documentation for Informal and Formal Internal Compliance Reviews and the NIFA Civil Rights Compliance Review.

Legal and logistical questions about providing access to individuals with Limited English Proficiency should be directed to UAF employees with expertise in those areas, primarily personnel at the [UAF Department of Equity & Compliance](#).

Participants should never incur a cost related to the arrangements that must be made to provide them access based on LEP status. Providing access is considered a cost of doing business. Questions about funding sources available to cover translation, interpretation etc. should be directed to staff in the [Signers’ Business Office](#) (SBO).

D. Key Definitions

The following terminology will be used throughout the plan, with these specific meanings:

Four-Factor Analysis: A set of guidelines we must use to assess LEP-related needs, as follows:

- “1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. the frequency with which LEP individuals come in contact with the program;
3. the nature and importance of the program, activity, or service provided by the program to people's lives; and
4. the resources available to the grantee/recipient or agency, and costs” (lep.gov)

Interpretation: The process of “immediate [oral] communication of meaning from one language (the source language) into another (the target language)” (lep.gov). A *Qualified Interpreter* is someone who can perform interpretation “at a level of fluency, comprehension, impartiality and confidentiality appropriate to the specific nature, type and purpose of the information at issue” ([NIFA LEP Guidance](#), 2016).

Limited English Proficiency (LEP): A designation for “individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English” ([lep.gov](#), 2020).

Meaningful Access: In the context of Extension, a condition present when an LEP participant gains the ability to obtain educational information and/or program benefits in a manner similar to participants without language barriers.

Translation: Differing from oral interpretation, translation is performed with written communication. A bilingual person does not necessarily have the skills necessary to perform translations adequately. Certified translators have professional training and experience.

Vital documents: “A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law. Vital documents include, for example: applications, consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; ...written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client” ([lep.gov](#), 2020).

II. Access Standards

A. Four-Factor Analysis

Standard 1: IANRE will employ the Four-Factor Analysis in decision-making

First factor: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee

As explained in [IANRE's 5-Year Civil Rights Performance Plan](#), Objective 4: For UAF Cooperative Extension, when the proportion of LEP persons who speak English less than “very well” reaches 5% of the population of a district, then that district should be ready to provide LEP services for that group of LEP persons. LEP services include the use of certified interpreters when needed.

Second factor: The frequency with which LEP individuals come in contact with the program
Examples within IANRE include that LEP participants are consistently encountered in Certified Food Protection Manager (CFPM) trainings. Multiple 4-H personnel have also reported having participants request language assistance in Spanish.

Third factor: The nature and importance of the program, activity, or service provided by the program to people's lives

Participation in UAF Cooperative Extension programs, by their nature, is voluntary unless the service is in partnership with an organization where participants are mandated by the organization to attend. This might include participants referred to the Expanded Food and Nutrition Education Program (EFNEP) or Supplemental Nutrition Assistance Program.

Generally, UAF Extension programs do not rise to a critical level of importance to LEP persons compared to federal, state, or local agencies dealing with health care (hospital, EMT, or emergency care), law enforcement (police), legal services or access to mandated federal benefits. However, programs targeting LEP persons should obviously include LEP services.

Those producing instructional materials and programs for LEP persons should ensure that instructional content has been culturally adapted to be consistent with the target clientele's values and beliefs, as well as conveying information that will increase the group's understanding of the surrounding majority culture.

IANRE's priorities for proactive efforts, due to program nature and importance, are as follows:

- A. Safety-related programming, such as Emergency Preparedness and Gauge Testing
- B. Health-related programming, such as Chronic Disease and Diabetes Management
- C. Other programming related to basic needs like Water Quality or Food Security

Fourth factor: The resources available to the grantee/recipient or agency, and costs
IANRE considers providing access to LEP individuals an expected cost of providing programming, and has designated a fund/org named FC IANRE Civil Rights that can be drawn from for this purpose as well as provide a method to track expenses related to translation and interpretation services during each fiscal year.

UAF as a whole has experienced several years of consecutive budget cuts, and IANRE recognizes that some costs may be beyond the budget of the unit. In those cases, leadership will seek assistance from other offices on campus and partner agencies to see what funds may be leveraged to provide meaningful access. See section IV for more information on costs and tips on budgeting for LEP-related activities.

B. Translator Competence

Standard 2: IANRE will work to ensure interpreter and translator competence

- No persons under 18 may be solicited to serve as an interpreter or translator for IANRE.
- Bilingual employees and family members should only be consulted in emergency situations, and not relied upon regularly for services.
- Even if a participant offers to bring in a family member or friend as an interpreter or translator, employees should (a) make the participant aware that certified interpreters and translators may be made available at no cost to the participant, and (b) inform the participant the family member or friend cannot be utilized if it becomes clear the family member or friend is not fully capable of the translation or interpretation
- Each office will keep a current list of certified interpreters and translators.

C. Addressing Complaints

Standard 3: IANRE will properly address discrimination complaints

Employees and volunteers will follow IANRE's complaint procedures, detailed at www.uaf.edu/ces/about/civil-rights, to document LEP-related complaints. All program participants have a right to file a complaint, and must be advised of that right. The following contact card is considered a vital document that will be prioritized for translation:

If you would like more information about civil rights at the University of Alaska Fairbanks, or to make a discrimination complaint, contact the UAF Department of Equity and Compliance at 907-474-7300 (TTY: 907-474-2660). You may also wish to speak to the director of IANRE at 907-474-7429 or contact the United States Department of Agriculture (USDA) customer service at 1-866-632-9992.

III. LEP Needs Assessment

Request Logs

All employees and volunteers should document any LEP-related requests received during outreach. An LEP Requests and Actions Log is part of every set of office civil rights files, and should be updated regularly. A blank copy of the log is included in Appendix A.

In November 2020, IANRE employees were asked to share the LEP needs they had observed in their communities through both Zoom discussions and updating their LEP logs. The findings related to that effort are shared in Appendix B.

Alaska LEP Data Sources

Information on the major language groups in Alaska can be found at <https://www.lep.gov/maps>

The percentage of people who speak English “less than very well” in Alaska is mapped at www.census.gov/library/visualizations/interactive/people-that-speak-english-less-than-very-well.html

All IANRE office files (LEP folder) also have a copy of the 2015 Alaska Language Map, which is the most recent version available from lep.gov. That map mentions percentages of “Other Native North American Languages.” According to the Alaska DOT’s Language Access Plan (2018), “Alaska Native languages such as Inupiaq, Gwich’in, Koyukuk, Athabascan, and Tanana are [primarily] located in the North/North East. In the South/South East some of the identified groups/ languages identified are Tlingit, Eyak, Haida, and Tahltan. Within the West/Southwest some of the identified groups/languages are Dena’ina, Alutiq/ Sugpiaq, Koyukon, and Central Yupik. Within the Alaska Native groups some still speak the traditional language as well as English.”

According to the Anchorage Public Library (2018) Language Access Plan:

“The Mayor’s Language Access Liason examined for the Municipality of Anchorage the U.S. Census Bureau’s 2009-2013 American Community Survey, Table B16001 ‘Language Spoken at Home by Ability to Speak English for the Population 5 years and Over.’ Through an analysis of population sorted by census tracts within the Municipality of Anchorage, it was determined that approximately 6.2% of the Anchorage population (17,050 individuals) speak English ‘less than very well’” (p.4).

The table that follows is adapted from the same library page:

Table 1: Anchorage LEP Populations Exceeding Safe Harbor Threshold of 1,000 individuals

Primary Language Spoken	# of Individuals in Anchorage
Hmong	1687
Korean	1539
Spanish or Spanish Creole	3287
Tagalog	3881

The sources mentioned above were used to set the service area priorities shown below.

Table 2: Highest Need Non-English Language Groups by IANRE Service Area

Service Area	Language(s) to Prioritize	Relevant Factor(s)
Anchorage	Hmong, Korean, Spanish, Tagalog	Number of LEP persons
Bethel/Dillingham	Albanian, Korean, Spanish, Yup'ik	Frequency of contact
Juneau	Spanish, Tagalog	Nature of programs
Kenai	German, Russian, Spanish, Tagalog	Nature of programs
Kodiak	Russian, Spanish, Tagalog, Thai	Frequency of contact
Mat-Su	Russian, Spanish, Tagalog	Nature of programs
Northwest	Inupiaq dialects	Frequency of contact
Sitka	Spanish, Tagalog	Frequency of contact
Tanana, Delta, Tok	Chinese, Korean, Spanish, Tagalog	Nature of programs

IV. Budgeting for Access

A. Interpretation Costs

According to the Alaska Court System (2016), a professionally qualified spoken language (as opposed to sign language) interpreter can be paid up to \$40 an hour. This rate does not include mileage or other travel expenses that may be incurred.

B. Translation Costs

Most companies charge per word, with an average range of about .15 to .20 cents per word, according to University of Wisconsin Extension's LAP (2018).

C. Grant Budgeting Tips

As noted in University of Wisconsin Extension’s Language Access at Extension page (2020), obtaining a letter of support from your campus civil rights office or language access team can be extremely helpful in demonstrating to potential funders the value of including language access activities in the project. Consider this statement from their [Sample Letter of Support](#): “As outlined above, the Language Access Team is offering the [PI] in-kind support at a standard market rate for comparable services. This includes time we spend during project consultation, developing a language access plan, marketing strategies, translation project management, logistical assistance with sourcing and hiring professional service vendors, and any other form of support related to addressing linguistic and cultural barriers.”

V. Access Resources

A. I-Speak Cards: <https://www.lep.gov/i-speak-card>

USDA-branded statement menu:

<https://fns-prod.azureedge.net/sites/default/files/cnd/lSpeak.pdf>

For low-literacy participants:

<https://public.courts.alaska.gov/web/language/docs/poster-flags.pdf>

B. Alaska Talent Pools

Language Interpreter Center

431 West 7th Ave. Suite 208
Anchorage, AK 99501
Phone: 907-297-2760
Fax: 907-279-2450
Toll Free: 1-877-273-2457

C. Interpreting for Zoom

Wisconsin Extension offers the following guide:

- [Managing Zoom Interpretation](#)

D. Translation Project Management

Wisconsin Extension offers the following guides:

- [Tips to choosing to translate materials](#)
- [Tips for managing your translation project](#)
- [Translation and interpretation budgeting standards for projects and programs](#)

APPENDIX B: Inventory of IANRE LEP R&A Log Entries 2017-2020

Date	Nature of Request	Action Taken
2017	Client who could not hear, read lips or speak asked to communicate by writing back and forth to each other.	Wrote notes back and forth until we found the publications wanted and the faculty member client needed to see. (exact date not available)
Ongoing	Korean Certified Food Protection Manager Training study materials are provided to those who speak only Korean. Tests writing in Korean also available.	Study materials and exams are available and used for students who only speak Korean.
Fall 2020	In case of future need for emergency interpretation	This bilingual (English/Spanish) staff member offered to help when a certified interpreter is not available
6/1-8/17	Spanish translation for 4-H member	Staff member proficient in Spanish was able to provide translation <i>[Note: was before training on LEP that covered certified translators]</i>
Fall 2020	MEFEC Employees noticed Spanish and Russian speakers in the community	Proactively put up door signage that has Spanish and Russian instructions in addition to English
6/1/2019	Request for Spanish interpretation at camp	No interpreter provided, as employee stated no volunteers could be found <i>[Note: was before training on LEP that explained our obligations]</i>
Fall 2020	Bethel Employees noted the languages they most frequently encounter	For Bethel, more attention should be paid to needs related to Yup'ik, Spanish, Korean and Albanian
Quarterly	CFPM exam proctored by UAF is offered in English, Chinese and Spanish. Had requests for Tagalog but exam is offered by outside vendor. Spanish speakers in class have said because the class is taught in English it is actually more confusing for them to take the exam/or order a book in their mother tongue because it might not line up with the instruction.	AN suggested sending a memo to the vendor alerting them to the need for a version in Tagalog. Action pending.

NOTE: This sheet lists all LEP Log entries included in the IANRE office civil rights folders as of Dec. 1, 2020