LANGUAGE ACCESS PLAN

Baltimore City Office of Information & Technology

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Introduction

Vision Statement

The Baltimore City Office of Information & Technology (BCIT) strives to provide equitable, culturally sensitive and effective access to City services to all residents, regardless of their ability to speak, read or write English. Language accessibility services are available to individuals who have Limited English Proficiency (LEP) that enable them to effectively communicate with BCIT in person, via the phone, in writing, and through electronic media. BCIT strives to engage ALL residents to help design, build and implement technology that creates a safe, thriving, and smart City.

Definitions

<u>Limited English Proficient (LEP):</u> Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

<u>Meaningful access:</u> Language assistance provided to LEP individuals that is accurate, timely, and effective.

<u>Translation:</u> The conversion of **written** materials from one language to another.

<u>Interpretation:</u> The conversion of **oral** interactions from one language to another.

<u>"Ad hoc" interpreter:</u> A person who provides interpretation services when necessary or needed, for whom interpretation is not part of their job responsibilities.

<u>Vital Documents:</u> Any form, permit, record, or other document that individuals applying for services or benefits from an agency must understand, respond to or complete, to access the services/benefits or continue to receive those services or benefits.

<u>Vital Programs or Services:</u> Those services or programs of such importance that an individual or requestor would experience serious consequences if language barriers prevented access to these services or programs.

<u>BCIT</u>: Baltimore City Office of Information & Technology

<u>BDE</u>: The Office of Broadband and Digital Equity (BDE), a division of the Baltimore City Office of Information and Technology, leads the City's efforts to permanently close the digital divide and serves as Baltimore City government's primary liaison with internal and external stakeholders in digital equity.

<u>FY25</u>: Fiscal year 2025 which spans from July 1, 2024 to June 30, 2025.

LEP Demographics

Baltimore City is home to almost 57,000 individuals (10.3% of the City's population) who speak a language other than English at home, and nearly 20,000 of those individuals speak English less than very well (3.7% of the population).[1] These individuals are *Limited English Proficient* (LEP), meaning that they do not speak English as their primary language and have limited ability to speak, write, or understand English.[2] Currently, the top five languages spoken by LEP individuals in Baltimore are: Spanish or Spanish Creole (8,837), Arabic (1,581), Chinese (1,356), French (1,065), and Korean (839).

Baltimore is also committed to welcoming its refugee population. Since 2015, over 2,500 refugees have come to call Baltimore home. Specifically in 2017, the International Rescue Committee (known as "IRC", Baltimore's local resettlement agency) resettled 587 refugees, and the languages most frequently spoken by those resettled that year were Arabic (12), Tigrinya (47), and Kiswahili (35). In 2018, the IRC resettled 338 refugees, with the languages spoken most frequently by those resettled being Kiswahili (58), Kibembe (37), and Dari (27).

Baltimore's immigrant & refugee populations benefit from language access services in the City of Baltimore, as these services enable New Americans to better navigate and access the City of Baltimore's programs & services.

Languages most frequently encountered by Baltimore City Office of Information & Technology: Based upon Language Line data for 311 calls for service during FY24, the top 5 languages with number of calls for service and percentage of our overall calls is detailed as follows:

311 Calls by Language	FY24	
Language	**# of Calls**	**% of Total Calls**
English	560,695	99.42%
Spanish	3,164	0.56%
Chinese (Mandarin)	31	0.01%
Other Languages	29	0.01%
Korean	9	0.00%
Arabic	6	0.00%
French	5	0.00%
Total # of 311 Calls Answered	**563,939**	**100.00%**

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[1] American Community Survey 2021 5-yr estimates

[2] Definition from LEP.gov

Legal Framework

The legal precedent for Language Access originates from Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. National origin has been interpreted to include language, and thereby, programs receiving federal funds cannot impede access to individuals who speak a language other than English.

Title VI was strengthened by Executive Order 13166, signed by Bill Clinton in 2000, which mandates certain language assistance in federal and federally funded programs. Thus, language access is particularly important for Baltimore City agencies that leverage receive federal funds for programming.

The Baltimore City Chief Administrative Officer's (CAO) directive, effective April 1, 2024, requires certain City Agencies that provide constituent-facing services to take steps to provide LEP persons with meaningful access to services and programs in their primary language, as well as to inform the public of the availability of language access services to assist them in obtaining and utilizing services.

Contact with LEP Individuals

The Baltimore City Office of Information & Technology has several divisions that have contact with the public.

(1) 311 – The public submits service requests to 311 via telephone, their website or mobile app. Language Line telephonic interpretation services are available to interpret for callers that are LEP or non-English speakers. In FY25, 311 will launch a Spanish-language version of the 311 website and mobile app to submit service requests.

(1) BDE – At times, BDE will hold meetings or information sessions. If language needs are anticipated, BDE will utilize in-person interpretation for appropriate language. BDE also provides information material regarding their services to the public. Translation of collateral is provided into the current top five languages spoken by LEP individuals in Baltimore: Spanish, Arabic, Chinese, French, and Korean.

(2) Public Facing Website and online Software Applications – BCIT supports the city's website and many web-based software applications used by the public. The website and most of the software applications can be accessed in other languages using the Google Translate feature generally located in the top right corner of the website browser.

Language Access Services

311

Current Protocols:

(1) Uses Language Line telephonic services to interpret for callers that are LEP or non-English speakers. 311 also monitors calls for quality assurance in real-time, as well from recorded calls to ensure standards are met.

(2) When receiving a call, 311 determines the language spoken by the individual based on various factors including caller self-identification in addition to language assessments. 311 assesses language through familiarity with accents, dialects, and years of experience utilizing Language Line services for interpretation.

Services to be provided in the future:

(1) In FY25, 311 will launch a Spanish-language version of the 311 website and mobile app to submit service requests.

BDE

Current Protocols:

(1) Translation of collateral into the top five languages spoken by LEP individuals in Baltimore for the following formats: signage, websites, social media, radio/tv announcements, and notice to community groups.

(2) If language needs are anticipated, BDE will request in-person interpretation through MIMA for appropriate language.

Services to be provided in the future:

(1) In FY25, BDE will seek potential grant funding for an in-person multilingual interpreter for community events or implement usage of the Language Line App when needed for Community events.

Applications

Current Protocols:

(1) The City's website and most of the software applications can be accessed in other languages using the Google Translate feature generally located in the top right corner of the website browser.

Services to be provided in the future:
 (1) As new applications are provided to the public, BCIT will strive to provide future applications include accessibility for individuals with Limited English Proficiency (LEP) whenever possible. Although we aim to prioritize these features, there may be instances where implementation is not feasible.

Oral Interpretation Services

Interpretation

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide an interpreter, at no cost to LEP individuals. 311 uses Language Line telephonic services to interpret for callers that are LEP or non-English speakers.

Protocols

To ensure that the inability to communicate in English does not deprive Baltimore citizens the rights and privileges, our department will provide interpretation, at no cost to LEP persons, pursuant to the following protocols:

(1) When 311 receives a call and the caller appears to be asking for help but has difficulty communicating what they need; or,
(2) An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or when a request for an interpreter is made either orally, in writing or by pointing to a language [iSpeak] card, the employee will utilize the Language Line application on their telephonic device and select the language needed from the 200+ languages.

Procedure

(1) Employee shall follow the steps of the BCIT Language Line Access Guide to connect with an interpreter via Language Line. This service is available during all hours that the 311 Call Center is open.

Future Plans

(1) Advertise the availability of language line services for LEP individuals who contact 311.

(2) Seek to hire more bi-lingual 311 call center agents and supervisors through targeted advertising and adding bi-lingual language preferences to 311 job postings.

(3) Seek potential grant funding for an in person multilingual interpretation services for BDE community events or implement usage of the Language Line App when needed for Community events.

Translation

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage, and portions of our website.

Translation of Vital Documents

A *vital document* is a document that is critical for obtaining services or benefits or is required by law. It also notifies a person of ineligibility for a particular service, if applicable. In the case of Baltimore City, vital documents must be translated into Spanish, French, Chinese, Arabic, and Korean.

BDE

Our BDE program translates materials into the aforementioned 5 languages for resource fairs. As of 8/20/24, the following documents are available online. Hard copies are brought to public events based on the demographics of the event.

- BDE newsletter is regularly translated into top 5 used languages.
- BDE Bmore Connected info
- Connect to Free Bmore WiFi Poster
- Digital Skills Training Poster
- Free Bmore Wifi User Guide (iPhone, Android, Mac, and Windows)

311

Key 311 materials are translated into Spanish. By Q2FY25, these documents will also be translated in the remaining 4 top used languages of Arabic, Chinese, French, and Korean:

- How to use the Baltimore 311 mobile app to request City of Baltimore services (video)
- What is 311? Document has been translated into Spanish, Arabic, Chinese, French, and Korean
- 311 Web & Mobile Multilanguage Services
- 311 App Translation
- 311 Most Used Service Requests
- 311 Translation Data

- Social Media communication

Bilingual Staff Capacity

Through self-report, BCIT has 13 staff members competent to deliver services in a language other than English. The languages by division are as follows. A number next to the language denotes the number of staff who self-identified as bilingual. Where there is no number, one staff identified as speaking that language.

Division	Language
Administration	Georgian, Russian, Chinese
Applications	Telugu (3), Hindi (2), Estonian, Farsi, Hebrew, Nepali
BDE	Hindi
Infrastructure	French, Ewe, Amharic

Future Plans

The agency intends to increase in-house language capacity by:

1. Including language skills as a "desirable" qualification in job announcements for 311 positions for the the Q2FY25 2025 recruiting class. We also plan to target recruitment within Spanish-speaking communities of Baltimore City.

Public Notice of the Right to Language Access

Critical to the successful implementation of language access services are public signage and notices that communicate the availability of these services to the LEP community. To support public awareness of language access services, the agency makes the following resources available to its customers:

(1) In all contexts where the agency interacts with the public and on its website, the agency will post and maintain clear and readable signs in the languages most prevalent in the City, notifying LEP individuals that free translation and interpretation services are available to them.

(2) Agency notices and flyers will also include information about the availability of language access services and simple instructions on how to request language assistance to be shared via signage, websites, social media, radio/tv announcements, and notice to community groups.

Staff Training

Training Protocol

(1) The agency's Language Access Plan will be included in the staff portal section of BCIT's intranet and will be added to the agency's Orientation presentation for new staff.

(2) All staff providing technical assistance, training, or receiving in-bound calls will complete the Language Access 101 & 102 trainings in Workday annually, or complete the training upon employment, and then annually.

(3) The Language Access 101 & 102 trainings will include information on the following topics:
- Legal obligation to provide language assistance,
- Overview of the LEP community in Baltimore,
- Summary of Language access policies,
- Identifying and responding appropriately to LEP individuals,
- Accessing interpreters (over-the-phone); and
- Using and working with interpreters.

(4) The agency will circulate the City's language access policy to all staff within 10 days after adoption. Every two years, the agency will circulate the revised policy and protocols to all staff after the revised policy is adopted.

(5) Orientation for New Staff– New staff will be provided training on the agency's Language Access Plan at the time of the onboarding process, to ensure they are aware of language assistance protocols.

(6) The following divisions, offices, or teams will require language access training. For existing staff, BDE and Change Management will complete by January 2025, IT Help Desk and 311 by April 2025 and Applications by May 2025. The Directors of these areas have already completed the trainings:

- 311
- BDE
- Applications
- Change Management & Communications
- IT Help Desk
- Note: The first six minutes of the Language Access 101 Training will be shared annually during BCIT's All Staff meeting.

Contracts

In instances where BCIT uses federal funds to contract or subcontract services to a third party, and those services may impact LEP individuals, BCIT ensures that the relevant third party acknowledges and affirms federal language access mandates.

Monitoring Plan & Compliance

BCIT will begin implementation of this language access plan as of October 1, 2024. Compliance with this plan will be demonstrated through:

- Language Access Liaison attendance at bimonthly, cross-agency liaison meetings convened by MIMA/
- Posting this plan to your Agency's website (technology.baltimorecity.gov) and cross-posting to MIMA's website (mima.baltimorecity.gov)
- Updating this plan by October 16, 2026 and resubmitting it to MIMA for review
- Responding to and resolving any complaints with the direction and support of MIMA
- Submission of an annual report to MIMA by October 31 of each year that will include the follow information:
    - Number of LEP Encounters (By Language)
    - Type of Language Services Provided to LEP Individuals
    - Number of Documents Translated
    - Language Services Expenditures
    - Number of Bilingual Staff
    - Number of Staff Trained in Language Access
    - Data on Services Offered to LEP Individuals
    - Evidence of Outreach to LEP Communities
    - List of Contracts that included the language access clause as described in the previous "Contracts" section.

Complaint Procedure

You may file a Language Access complaint if you believe you have been wrongly denied the benefits or services of this program due to language barriers. To file a complaint, you can contact 311 to file a "Language Access Complaint". When describing the nature of your complaint or concern, include the name of the agency, the employee (if known), the date of the incident, and a description of the incident.

To contact 311:

- Dial 311; or,
- [Submit a Language Access Complaint online](#)

Data Collection

BCIT will collect the following information and submit as part of an annual report to MIMA:

(1) Number of LEP Encounters (By Language) – To collect this information, BCIT will use Language Line usage and community event data.
(2) Type of Language Services Provided to LEP Customers – To collect this data, public-facing divisions will utilize Language Line records and community event engagement data.
(3) Number of Documents Translated – MIMA's Language Access team will provide a summary of document translations that were facilitated by MIMA. The agency will also include documents that were translated internally or by a professional vendor, apart from projects facilitated by MIMA.
(4) Language Services Expenditures – To collect this information, the Agency Fiscal Officer reviews information on expenditures for the following translation and interpretation vendors: Ad Astra Inc. and Language Line Solutions. MIMA's Language Access team additionally provides information on expenditures for these services that were paid for by the City's centralized translation and interpretation accounts.
(5) Bilingual Staff - To report on the number of bilingual staff in the agency and the number of staff trained in language access, the agency's human resources manager will provide the requested information.