



SANTA BARBARA COUNTY  
DEPARTMENT OF  
**Behavioral Wellness**  
A System of Care and Recovery

# Cultural Competency Plan- Language Access Action Plan 2019-2022

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# Language Access Plan

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## INTRODUCTION

In accordance with Title VI of the Civil Rights Act of 1964 and in order to prevent discrimination on the basis of national origin against persons who are Limited English Proficient (LEP), institutions receiving federal funding must take reasonable steps to help ensure that individuals have meaningful access to all their programs and activities. Although Title VI does not apply to federally conducted activities, Executive Order 13166 directs all federal agencies to establish a goal to "examine the services [they] provide and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency."

This Language Access Plan (LAP) establishes the steps Behavioral Wellness will take to help ensure that LEP individuals have meaningful access to programs and services.

Whenever possible, Behavioral Wellness will implement the actions in this plan including, but not limited to conjunction with other agency initiatives to increase access to programs and services including Section 508 of the Rehabilitation Act of 1973 and The Plain Writing Act of 2010, which requires Federal agencies to use plain writing for all public communication, especially public communication about benefits and services. The use of plain language, in any language, to communicate with individuals with LEP will help ensure accurate, understandable interpretations and translations, and support the overall goal of meaningful and inclusive access.

## LANGUAGE ACCESS STATEMENT

Behavioral Wellness provides individuals with LEP meaningful access to language assistance services in accordance with the Federal, State, and other Regulations.

## STATEMENT OF SCOPE

Under this plan, a Behavioral Wellness conducted program or activity is:

1. A program or activity involving the general public as part of ongoing Behavioral Health services.
2. A program or activity directly administered by Behavioral Wellness, or its contractors, for program beneficiaries and participants.

# IMPLEMENTATION OF THE LANGUAGE ACCESS PLAN

## Implementation Structure

In order to effectively implement the Language Access Plan, the Cultural Competency/Ethnic Services Manager is the designated person who leads the process of delivering language assistance services; identifying and assessing needs of services, system capacity, and implementing the provisions of this plan.

The Cultural Competency/Ethnic Services Manager will convene the Cultural Competency Diversity Action Team to assist in ensuring the Language Assistance Services, as described in this plan, are fulfilling applicable statutory and regulatory mandates, providing ongoing input to the overall planning, delivery of services, assessment of the outcomes, and effectiveness of the plan.

## Timeline for Implementation

Phase 1 (Fiscal Year 2019): The Ethnic Services Manager will identify and complete a system-wide language assistance services needs and capacity assessment and will identify the following at minimum, but not limited to:

- Estimated number of individuals identified as LEP in Santa Barbara County
- Number of individuals requiring Language Assistance Services (LAS) in the department's service system
- Number of individuals identified by primary or language of preference
- Number of department personnel identified as "bilingual qualified" by:
  - Designated Language Line Academy Certification Level
  - Recognized Language Certification
  - Personnel identified by category: Direct, Support, or Administrative Staff

## Implementation Structure

Implementation of all elements in the Plan must be completed by the end of Fiscal Year 2022. Throughout the assessment process, the Cultural Competency/Ethnic Services Manager will identify action steps where implementation can begin immediately based on existing capacity. Assessments will be done in accordance with the four-factor analysis established by the Department Office Justice in its original LEP Policy and contained in the HHS LEP Guidance to Recipients. The Department of Health and Human Services LEP Guidance, advises recipients to consider the following factors: (1) the number or proportion of LEP persons in the eligible service area; (2) the frequency with which LEP Persons come into contact with the program; (3) the importance of the service provided by the program; and (4) the resources available.

Phase 2 (Fiscal Years 2020-2021): The Cultural Competency/Ethnic Services Manager in consultation with the Cultural Competency Diversity Action Team, will ensure all action steps are completed by the end of Fiscal Year 2021.

## IMPLEMENTATION ASSESSMENT AND FUTURE PLANNING

In the second half of Fiscal Year 2020, the Cultural Competency Diversity Action Team (CCDAT), will assess progress of the LAS Implementation Plan. By the end of FY 2020, the Cultural Competency/Ethnic Services Manager will brief senior leadership on the results of the assessment. If there any deficiencies and/or recommendations based on the results of the assessment, the Cultural Competency/Ethnic Services Manager will work with the Quality Improvement Committee to consider recommendations for improvement.

## SECTIONS AND ACTION STEPS

The Language Access Plan is defined in ten sections. The Plan identifies specific action steps that Behavioral Wellness will strive to implement. These steps are critical for achieving the objective of providing meaningful access to programs and activities for LEP persons.

- **Section 1: Assessment of Needs and Capacity**
- **Section 2: Oral Language Assistance Services**
- **Section 3: Translation of Written Materials**
- **Section 4: Policies and Procedures**
- **Section 5: Notification of the Availability of Free Language Assistance**
- **Section 6: Staff Training on the Provision of Language Assistance**
- **Section 7: Assessment of the Accessibility and Quality of Services**
- **Section 8: Cultural Competency Diversity Action Team/Stakeholder Consultation**

## SECTION 1: ASSESSMENT OF NEEDS AND CAPACITY

Behavioral Wellness will establish a process to regularly identify and assess the language assistance needs of LEP individuals utilizing behavioral health services, as well as the processes to assess the agency's capacity to meet these needs according to the sections of this plan.

### **Description:**

Behavioral Wellness will assess the language assistance needs of LEP individuals based on client utilization data and staffing reports. This assessment may include identifying the non-English languages spoken by the population who are likely to be accessing the agency's services, and whether barriers—including literacy barriers—exist and hinder effective oral and written communication with individuals with LEP. Language data may be collected from various sources, including data from the Census Bureau and consumer contact files. In addition, Behavioral Wellness will also assess its staffing capacity to meet the needs of current and potential consumers in order to provide competent language assistance at no cost, and in a timely manner, to individuals with LEP.

## SECTION 2: ORAL LANGUAGE ASSISTANCE SERVICES

### **Description:**

Behavioral Wellness will provide oral language assistance (such as qualified interpreters or staff whose proficiency in non-English languages has been tested for competence) in both face to face and telephone encounters, that addresses the needs identified.

Language assistance may be provided through a variety of means, including qualified bilingual and multilingual staff, contract interpreters (including telephonic interpretation), and interpreters from volunteer interpreter programs. Behavioral Wellness will ensure that the interpreters used are qualified to provide the service.

The following are our current contract providers:

- Language Line
- Ortiz-Schneider Incorporated
- Independent Living Resource Center- American Sign Language

## SECTION 3: TRANSLATION OF WRITTEN MATERIALS

Behavioral Wellness will establish and maintain an infrastructure to provide written translations.

### **Description:**

The Cultural Competency/Ethnic Services Manager will establish the Translation Review Committee who will be responsible for reviewing the accuracy of all translated documents in the Threshold Language-Spanish.

Translated documents will be field tested and made accessible in various formats; including print and electronic media. In accordance with the assessment of need and capacity, additional vital documents will be translated in languages other than English.

Currently, translation is performed by Ortiz-Schneider Incorporated.

## SECTION 4: POLICIES AND PROCEDURES

Behavioral Wellness will develop, implement, and regularly update written policies and procedures to ensure individuals with LEP have meaningful access to agency programs and services.

### **Policies:**

- Language Services for Limited English Proficiency (LEP) Beneficiaries

- Cultural and Linguistic Competency
- Beneficiary Information
- 24/7 Toll-Free Access Line

## **SECTION 5: NOTIFICATION OF THE AVAILABILITY OF FREE LANGUAGE ASSISTANCE SERVICES**

### **Description:**

Behavioral Wellness proactively informs individuals with LEP that language assistance is available to them at no cost. Notification methods may include multilingual posters, flyers, and brochures, as well as statements on application forms and informational material distributed to the public; including electronic forms such as agency websites, taglines in English, written documents, etc.

## **SECTION 6: STAFF TRAINING AND BILINGUAL ALLOWANCE**

### **Description:**

Behavioral Wellness will provide employees with training, as necessary, to ensure staff understand and can implement the policies and procedures of the Language Access Plan.

Behavioral Wellness designed training will ensure staff understand the importance of, and are capable of, providing effective communication to individuals with LEP in all programs and activities.

The County of Santa Barbara provides a bilingual allowance certification for employees who successfully pass an oral examination. The bilingual certification process is voluntary and results in an additional monetary compensation to employees. Department employees most often attain certification in Spanish, the threshold language. The County of Santa Barbara does provide bilingual certification testing for a small number of other languages, as well.

It is important to note the bilingual certification is very specific in terms of what an employee attaining this certification can do. It is expected the employee will fulfill the needs within the scope of their job duties.

## **SECTION 7: ASSESSMENT OF ACCESSIBILITY AND QUALITY OF SERVICES**

Behavioral Wellness will regularly assess the accessibility and quality of language assistance activities for individuals with Limited English Proficiency, maintain an accurate record of language assistance services, and implement or improve LEP outreach programs and activities in accordance with consumer need and agency capacity.

## **SECTION 8: STAKEHOLDER CONSULTATION**

Behavioral Wellness will consult with Cultural Competency Diversity Action Team and interested stakeholders to identify language assistance needs of individuals with LEP. The Cultural Competence/Ethnic Services Manager will report findings to the Quality Improvement Committee in order to implement appropriate language access strategies to help ensure individuals with LEP have meaningful access in accordance with assessments of consumer needs and agency capacity, and evaluate progress on an on-going basis.