

Steppingstone

Language Access Plan

Effective Date: 1/1/18

Plan Approved

Board of Directors : Date _____

CEO / Date _____

Introduction

Steppingstone is subject to federal and state laws, and local funding stipulations that mandate persons with limited English proficiency are entitled to language assistance at no cost to the individual with respect to the services and benefits provided by this agency. These requirements include: Title VI Civil Rights Act of 1964, State of Missouri Department of Social Services Children's Division TLP Contract and Jackson County Community Mental Health Fund Agreement for Mental Health Services.

This agency is subject to applicable language assistance accreditation standards from its accrediting body, COA.

In addition, through its Board-adopted cultural competence plan Steppingstone is committed to equitable access to its supports and services.

Methodology

The Board of Directors, Steppingstone's Standards and Practice Committee and cultural competence advisory committee have formally committed to the following methodology to develop and oversee language access.

- 1) conduct a four factor analysis
- 2) develop a language access plan (LAP)
- 3) provide appropriate language assistance

Steppingstone researched and completed items [one and two] on 9/1/17. Item [3] will be implemented according to the action steps described in the LAP.

Four factor analysis

Steppingstone will assess and evaluate factors when determining how to best serve eligible limited English speaking persons. These factors include the number portion of limited English speaking persons eligible to be served or likely to be encountered by a program, activity, or service of the agency; the frequency with which limited English speaking persons come in contact with the agency or its programs; the nature and importance of the program activity or service provided by the agency and the resources available and costs to the recipient.

Factor 1. The proportion and number of limited English speaking persons within the agency’s service area.

The service area for this for factor analysis is defined geographically as: Jackson County, Missouri.

The most recent data collected pertaining to language frequency for this area is: the 20011 through 2015 American Community Survey 5-Year Estimates conducted by the United States Census Bureau.

Data from the Raytown Quality School District was also reviewed for the most common non-English languages spoken by students.

Listed below is demographic information for the agency’s service area.

Races/Ethnicity in Jackson County

Race/Ethnicity	Estimate	%
White	453,254	66.6%
Black/African American	161,722	23.8%
American Indian and Alaska Native	3,282	0.5%
Asian	11,938	1.8%
Native Hawaiian/Pacific Islander	1,569	0.2%
Some other Race	28,580	4.2%
Two or More Races	20,560	3.0%
Total	680,905	100%

Source: 2011-2015 American Community Survey 5-Year Estimates

Hispanic or Latino (of any race)	Estimate	%
Hispanic or Latino (of any race)	58,974	8.7%
Mexican	42,731	6.3%
Puerto Rican	2,916	0.4%
Cuban	1,526	0.2%
Other Hispanic or Latino	11,801	1.7%

Source: 2011-2015 American Community Survey 5-Year Estimates

Languages Spoken at Home in Jackson County

Languages Spoken at Home			Speak English less than “very well”	Speak English less than “very well”
	Estimate	%	Estimate	%
Speak only English	576,485	90.9%	(X)	(X)
Speak a language other than English	57,424	9.1%	22,811	39.7%
Speak a language other than English				
Spanish	37,131	5.9%	15,812	42.6%
Other Indo-European languages	7,442	1.2%	1,656	22.3%
Asian and Pacific Island languages	8,557	1.4%	3,725	43.4%
Other languages	4,274	0.7%	1,618	37.9%

Source: 2011-2015 American Community Survey 5-Year Estimates

Factor 2. Frequency of contact with limited English speaking persons.

Steppingstone has obtained and analyzed internal data and interviewed appropriate staff and report no instances of interpretive or translation services were provided/required in the past five years.

Factor 3. The nature and importance of programs and activities provided by the agency.

Steppingstone is a program of Every Child’s Hope (ECH). Steppingstone is licensed by the State of Missouri Department of Social Services, Children’ Division and the Department of Mental Health as a Residential Treatment Agency for Children and Youth.

Steppingstone offers a Transitional Living Program for older youth. This program provides an essential safety net for older youth that are homeless, run-aways, at-risk and aging out of the foster care system. As such, delay of response to inquiries and access to services may engender serious health and safety consequences for persons and families seeking admission.

Therefore, it is incumbent upon Steppingstone to minimize time delays and other barriers by establishing within this plan, procedures for obtaining an interpreter and for translation of documents. Furthermore, as stated in ECH’s Policy and Procedure on Culturally Competent Services (4.01, Section I – Policy Statement), “ECH will provide services that recognize and respect an individual’s culture, beliefs, practices, and preferred languages so each recipient may feel included and non-stigmatized when engaging and participating in services”.

Steppingstone’s Cultural Competence Plan states, “Programs must do more than offer equal, nondiscriminatory services, they must tailor services to their consumer populations.”

Factor 4. Resources available for this agencies regional responsibility.

As a Department of Social Services, Children’s Division licensed Residential Treatment Agency for Children and Youth this agency receives public and private revenue and funding from a number of payer sources which include:

Federal funding includes Centers for Medicare and Medicaid Services (CMS).

State funding includes Department of Social Services Children’s Division.

Local funding includes Jackson County Community Mental Health Fund.

Private funding includes philanthropy from individual donors, groups and foundations.

Language access plan

This service area has relatively few residents with limited English proficiency, per the above data. We are committed to removing as many barriers to information access as feasible. The following steps have been identified to reduce language barriers to limited speaking individuals served by or in our service area:

- Formally document any instances of limited English speaking individuals, requests, or inquiries by each staff member receiving any call or inquiry to establish services. This information will be used as a data source to identify potential future language needs
- Post signage at the Steppingstone administration building, admissions office and campus living facilities noting that language translation is available upon request. Language in the signage to correspond with the threshold language groups identified elsewhere in this plan.
- On the Steppingstone website note that interpreters and document translation are available upon request
- Identify a resource list of interpreters and translation services
- Collaborate with local agencies and institutions who are able to provide interpretation and translation services
- Whenever information is made available in multiple languages, have the translations on file and on display if possible in all locations, and specifically for locations in which persons seeking services are physically, telephonically, or electronically in contact with the organization
- Review the data available through the United States Census Bureau or other local sources (such as MARC, school districts, Medicaid, etc.) to establish baselines and monitor changes in the limited English speaking population for this service area
- Post the cultural competence plan and language access plan on the agency's website
- Review the language access plan annually or as needed. Updates should include interviews with key partners in this service area (e.g.,) school districts, law enforcement, nonprofit organizations that provide counseling, youth services, young adult transition, faith communities, social determinants service providers, etc.
- Apprise patient advocates and others in an ombudsman role of these policies and procedures.

Implementation

Staff: To implement this plan staff will be made aware of this plan, community resources, and will be trained in how to access them. Staff supervision will integrate oversight into direct service staff use of language access materials and resources.

Information Resources: Consumer rights notices and other information on due process procedures and complaints will be available in locations identified per the above. Staff will be provided with information on where translated information resources are available to download from the agency's website.

Language Resources: An internal database will be created by conducting a survey of the staff and their language skills. The Standards and Practice Committee will gather information on bilingual certification and begin the process of long-term planning so that merit review, pay, responsibilities, and leadership opportunities are reflective of the assets created for the organization by staff that are certified as bilingual. The cultural competence committee and management will also explore other forms of interpreter certification as appropriate.