

# LANGUAGE ACCESS PLAN

Mayor's Office of Employment Development

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# Introduction

## Vision Statement

As a Welcoming City, Baltimore is committed to taking reasonable steps to ensure that all persons have meaningful access to City services, including those with limited English proficiency. The Mayor's Office of Employment Development (MOED) aspires to provide effective, efficient, and equitable service to all people, regardless of whether they can speak, read, or write English. LEP individuals have access to many service delivery alternatives, allowing them to effectively engage with MOED in person, over the phone, in writing, and via technological media.

## Definitions

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

**Meaningful access:** Language assistance provided to LEP individuals that is accurate, timely, and effective.

**Translation:** The conversion of **written** materials from one language to another.

**Interpretation:** The conversion of **oral** interactions from one language to another.

**“Ad hoc” interpreter:** A person who provides interpretation services when necessary or needed, for whom interpretation is not part of their job responsibilities.

**Vital Documents:** 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.

**Vital Programs or Services:** 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.

## 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).<sup>1</sup> 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.<sup>2</sup> 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 The Mayor’s Office of Employment Development: Drawing upon data collected by our respective departments, which include the frequency of LEP individual encounters based on language, documents translated and language service expenditures, The Mayor’s Office of Employment Development most often engages with LEP individuals speaking the following languages: Spanish, French, Arabic, Korean, Chinese, and Russian. This data informs our strategic approach to effectively address the language access needs of our diverse community.

## 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.

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<sup>1</sup> [American Community Survey 2021 5-yr estimates](#)

<sup>2</sup> Definition from [LEP.gov](#)

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

<p><b>Northwest One-Stop Career Center</b>          (home of the Re-entry Center)          2401 Liberty Heights Avenue          Mondawmin Mall – Suite 302          Baltimore, Maryland 21215          Phone (410) 396-7873</p>	<p><b>Eastside One-Stop Career Center</b>          3001 East Madison Street          Baltimore, Maryland 21205          Phone (410) 396-9030</p>
<p><b>Employment Connection Center</b>          1410 Bush Street          Baltimore, Maryland 21230          Phone (410) 396-1052</p>	<p><b>Workforce Reception Center</b>          100 W. 23rd Street          Baltimore, Maryland 21218          Phone (410) 396-6580</p>
<p><b>Bon Secours Community Works</b>          Community Job Hub          31 South Payson Street          Baltimore, MD 21223          443-826-9208</p>	<p><b>Govans Ecumenical Development Corporation (GEDCO)</b>          Community Job Hub          401 Woodbourne Ave          Baltimore, MD 21212          410-532-7117</p>
<p><b>Enoch Pratt</b>          Community Job Hub          400 E. 33<sup>rd</sup> Street          Baltimore, MD 21218          410-396-6053</p>	<p><b>International Rescue Committee</b>          Community Job Hub          1900 N. Howard Street, Suite 200          Baltimore, MD 21218          443-494-9474</p>
<p><b>My Brother's Keeper</b>          Community Job Hub          4207 Frederick Avenue          Baltimore, MD 21229          410-746-5695</p>	<p><b>Our Daily Bread Employment Center</b>          Community Job Hub          725 Fallsway          Baltimore, MD 21202          667-600-3400</p>
<p><b>House of Ruth</b>          Community Job Hub          2521 N. Charles Street          Baltimore, MD 21218          410-746-5695</p>	<p><b>Youth Services Division</b>          101 W. 24<sup>th</sup> Street, Baltimore, Md. 21218          410-396-6722</p>
<p><b>Westside YO Center</b>          1510 W. Lafayette Avenue (Gilmor Street entrance),          Baltimore, MD 21217          410-545-6953</p>	<p><b>Eastside YO Center</b>          1212 N. Wolfe Street, Baltimore, MD 21213          410-732-2661          Monday - Friday, 8:30am - 5pm          The Eastside YO Center is operated in partnership with          the Historic East Baltimore Community Action          Coalition (HEBCAC)</p>

MOED staff at the above locations are trained and will notify LEP customers that language assistance services are available at no cost to them via telephonic interpretation, posters/signage and verbally through bi-lingual staff.

Mayor's Office of Employment Development has several points of contact with the public:

- (1) Office walk-ins – Several times a month, LEP individuals come into MOED's office looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
- (2) Workforce Development Workshops/Information sessions – Several times a month MOED will hold workshops or information sessions. If language needs are anticipated, MOED will utilize the telephonic interpretation for appropriate language interpretation.
- (3) Job Fairs/Community Resource Events – Several times a month MOED will attend or host job fairs or community events. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
- (4) Mobile Career Services - Several times a month, LEP individuals are connected within in the community looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation. \*\*There is a hired bi-lingual staff for the Mobile Career Services program.

# Language Access Services

## 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 telephonic interpretation, at no cost to LEP individuals. Services offered include telephonic interpretation and in person interpretation, signage and posters/flyers.

### Protocols

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 persons, pursuant to the following protocols:

- (1) An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
- (2) When a request for an interpreter is made either orally, in writing or by pointing to a language iSpeak card, the employee shall determine the availability of bi-lingual staff in the worksite who speak the language being requested.

### Procedure

- (1) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpretation services, and the process to do so outlined below:

Telephonic Interpretation – MOED can get an over-the-phone interpreter by calling the following vendor: Language Line Solutions. This service is available 24/7.

To submit a request, call **1-855-412-6120** and Access code **#10**.

### Future Plans

1. **Use telephonic interpretation and ensure that the public knows about the availability of these services.** MOED makes telephonic interpretation services available in its main office through Language Services Associates. The telephonic interpretation service is available in over 170 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on using telephonic interpretation services.
2. **Grow in-person interpretation services.** MOED can offer in-person interpretation through bi-lingual staff upon scheduled meetings/appointments. MOED will continue to

inform the public about these resources through social media, visible multilingual signs and will continue to hire bi-lingual staff.

## 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. We also have hired and will continue to hire bi-lingual staff for various divisions.

### 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, & Korean. With regards to identifying vital documents, MOED determines vital documents as anything a customer needs to complete, sign, understand important information in order to receive services.

MOED has created a collection of materials that are critical to LEP persons' access to MOED's programs. Documents have been identified that may contain significant information, including notices about MOED language access services and how to receive them. MOED presently distributes important papers in the following languages: Spanish, French, Chinese, Arabic, and Korean. The following vital documents have been professionally translated:

- ESCC Orientation Flyer Updated 2023
- Baltimore City Local Hiring Law
- Acknowledgement Receipt
- Individualized Training Accounts Application
- Applicant Statement - WIOA Adult
- WIOA Youth MWE enrollment
- Career Center Network Individual Employment Plan
- Career Center Network Pre-Registration Form
- Career Center Network Release of Information
- Career Center Network Consent for Information Form
- Equal Employment Opportunity Grievance
- Sexual Harassment Policy
- Student Attendance Log
- Financial Empowerment Counseling Flyer
- Recovery Works Flyer



- Pathways to Careers Flyer
- South Baltimore ECC Flyer
- Resume SOP
- BYOS Youth Applicant Statement
- BYOS Customer Agreement of Participation
- BYOS Customer Profile
- BYOS Customer Request
- BYOS Release of Information
- YO Consent to Use Photos
- YO Acknowledgement of Receipt
- MWE Eligibility for Youth WIOA
- Youth Works Application
- Youth Opportunity Handouts
- Youthworks FAQ Sheet
- Youthworks Worksite Application Card
- Youthworks Youth Application Card
- US Focus Card Activation Instruction
- Youthworks Important Dates sheet
- Youthworks Youth Participant manual
- Youthworks Job Description for Hispanic Community Outreach person

### **Future Plans**

1. Continue growing and maintaining translation services. MOED will look to build translation funding for documents, postage/signage into the budget.

## **Bilingual Staff Capacity**

This list identifies the languages spoken by staff in the Mayor's Office of Employment Development who are linguistically, culturally, and technically able to deliver services in a language other than English.

- Spanish
- Korean

### **Future Plans**

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

1. Creating new positions for and hiring full-time or part-time employees within distinct departments.
2. Reclassifying existing positions to include required language skill(s).
3. Including language skills as a “desirable” qualification in job announcements.

# 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. Posters and other signage notifying LEP individuals of their right to services in their primary language will be displayed in publicly accessible area. This signage will contain a simple message, such as “Free Interpreter services are available. Please ask for assistance.” The message will be posted in English as well as the principal languages spoken in the service area.
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.

Some ways of accomplishing this objective include:

- Posting signs in intake areas and other customer entry points.
- Placing notices that language services are available in outreach documents (brochures, recruitment information, etc.)
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Providing notices in non-English language radio and television stations about the availability of language assistance services.
- Making presentations and/or posting notices at schools and religious organizations.
- Posting information on MOED Website to announce Language Assistance services.
- Follow organizations on social media and encourage those organizations to follow MOED in the same.

## **Future Plans:**

3. Tag lines will be included in or attached to a document. Taglines in non-English languages can be used on documents written in English that describe how LEPs can obtain a translation of the document or can access an interpreter to read or explain the document.
4. Staff will also have access to “I Speak Bmore” language access cards. These come with a detachable wallet-size card that says in both English and a second language “I speak (language). I need assistance in (language).”
5. 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.

## Staff Training

MIMA will provide initial training for employees who have potential direct contact with LEPs or who work with vital documents that should be available to the LEP community. MOED's Language Access Liaison will assist with the identification of employees who require training. Supervisors of employees who have direct contact with LEPs will also be required to attend the training, as they will be responsible for onboarding and training new employees and ensuring that they comply with MOED's language access plan.

The following departments will require language access training:

- Adult Services Division
- Youth Services Division
- Employer Services Division; and
- MOED central office

Essential staff responsible for providing information and services to LEP individuals:

- MOED's Administrative professionals
- Career Development Facilitators; and
- Business Service Representatives

After the initial training, MIMA will continue to provide large group trainings up to twice a year, as requested by MOED.

### **Future training plans**

- MIMA will be able to provide the agency with support needed to identify specialized trainings on cultural competency and language access topics for different divisions.

## Contracts

In instances where Mayor's Office of Employment Development uses federal funds to contract or subcontract services to a third party, and those services may impact LEP individuals, Mayor's Office of Employment Development ensures that the relevant third party acknowledges and affirms federal language access mandates.

## Monitoring Plan & Compliance

The Mayor's Office of Employment Development will begin implementation of this language access plan as of 9/30/2024. Compliance with this plan will be demonstrated through:

- Language Access Liaison attendance at bimonthly, cross-agency liaison meetings convened by MIMA (MIMA will monitor attendance.)
- Posting this plan to MOED's website (<https://moed.baltimorecity.gov/>) and cross-posting to MIMA's website (<https://mima.baltimorecity.gov/>)
- Updating this plan by [9/30/2026] 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 following 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
- Submit a Language Access Complaint online at <https://balt311.baltimorecity.gov/citizen/s/>.

Other methods for providing feedback or filing complaints/grievances in the event an LEP individual has difficulty accessing services through MOED:

In addition to the City's Language Access complaints process, MOED has established a grievance procedure that is concerned with the protection of the rights, privileges and prerogative

of the program and participants, employees, sub-recipients or other interested persons for the purpose of receiving and resolving complaints raised in connection with programs operated by the agency and its sub-recipients. For more information on this policy and procedure, please contact the Language Access Liaison.