



# Saginaw Chippewa Tribal College

## Language Access Plan

2024

### **Introduction**

Language can be a barrier for accessing important services, understanding and exercising important rights, complying with applicable responsibilities or understanding information provided by federally funded programs. This Language Access Plan (LAP) establishes the policies and procedures for ensuring that persons with limited English proficiency (LEP) have meaningful access to Extension programs and activities that receive Federal financial assistance and are conducted by the Saginaw Chippewa Tribal College (SCTC). The purpose of this document is to determine the extent and needs of the limited English proficient population in our service area and identify actions to ensure discrimination does not occur to persons who receive our services and who do not speak English very well. This plan is available to SCTC employees to be used as a guide with respect to interactions with LEP customers.

### **Legal Authority**

Title VI of the Civil Rights Act of 1964 and its implementing regulations provide that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, being denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Under this law, federally assisted programs must take reasonable steps to ensure that LEP person receive the language assistance necessary to afford them meaningful access to programs and activities, free of charge to avoid discrimination on the grounds of national origin. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 453 (1974), interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

*Executive Order 13166*, Improving Access to Services for Persons with Limited English Proficiency (2000), states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Executive Order recommended uniform guidance to recipients on the preparation of a plan to improve access to its federally assisted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the US Department of Justice's 2002 policy guidance document. Consistent with this guidance, USDA published its Final "Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency" (2014) which effectuates the provisions of Title VI of the Civil Rights Act of 1964 to the end that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity of a recipient receiving Federal financial assistance.

## **Commitment**

SCTC is committed to providing meaningful access to its Extension programs and services to persons who, as a result of their national origin, are limited in English proficiency. SCTC will ensure no person is subjected to prohibited discrimination based on national origin in any program receiving Federal financial assistance.

## **Definitions**

*Federally Assisted Programs and Activities:* Programs and activities of an entity that receives Federal financial assistance.

*Interpretation:* The process by which the spoken word is used when transferring meaning between languages.

*Language Access:* Efforts by an agency or organization to make its programs and services accessible to individuals who are not proficient in English.

*Qualified Interpreter:* An individual who is competent in providing interpretation services at a level of fluency, comprehension, impartiality and confidentiality appropriate to the specific nature, type and purpose of the information a issue.

*Recipient:* Any state, political subdivision of a State, or instrumentality of any State or political subdivision, any public or private agency, institution or organization or other entity, or any individual, in State, to who Federal financial assistance is extended, directly or through another recipient.

*Translation:* The process of transferring ideas expressed in writing from one language to another language.

## **Scope**

USDA regulations require all recipients of Federal financial assistance provide meaningful access to LEP persons. Coverage extends to a recipient's entire program or activity, e.e., to all parts of a recipient's operations. This Language Access Plan applies to Extension Projects, programs, events or other outreach activities hosted, sponsored or provided by faculty, staff, graduate students and volunteers on behalf of SCTC.

## **Four-Factor Analysis**

SCTC's Language Access Plan is based on a four-factor analysis used to determine the appropriate language assistance services that ensure an LEP person has meaningful access to Extension's outreach and engagement programs and activities. The four factors on which this plan is based are:

1. The number of proportion of LEP persons eligible to be served or likely to be encountered by Research or Extension programs.
2. The frequency with which LEP persons come in contact with Extension programs,

3. The nature and importance of the programs and services provided by Extension to LEP persons, and
4. The resources available for LEP services and associated costs.

*Factor 1. Determine the number or proportion of LEP persons eligible to be served or likely to be encountered by the program.*

To determine the number or proportion of LEP persons eligible to be served or encountered during program delivery, Extension Program gathered and reviewed demographic data for languages primarily spoken in Michigan. This *will* enable the SCTC’s Extension Program to determine the top languages that employees may encounter.

Based on its assessment of the number of LEP individuals eligible to be served by Extension programs, the following language groups were identified. As seen in the table below, the primary LEP group in Michigan is English speakers. Because a range of outreach programs and services are delivered in Isabella county in the state of Michigan the eligible number and proportion of LEP individuals has been determined as 1.3%.

Table [S1601: Language Spoken at Home - Census Bureau Table](#)

Isabella County, Michigan												
	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	62,008	*****	(X)	(X)	61,229	±248	98.7%	±0.4	779	±249	1.3%	±0.4
Speak only English	58,499	±453	94.3%	±0.7	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	3,509	±455	5.7%	±0.7	2,730	±386	77.8%	±6.1	779	±249	22.2%	±6.1
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	1,094	±213	1.8%	±0.3	855	±210	78.2%	±9.0	239	±99	21.8%	±9.0
5 to 17 years old	157	±70	0.3%	±0.1	143	±68	91.1%	±14.1	14	±21	8.9%	±14.1
18 to 64 years old	826	±172	1.3%	±0.3	624	±160	75.5%	±10.9	202	±97	24.5%	±10.9
65 years old and over	111	±36	0.2%	±0.1	88	±35	79.3%	±15.0	23	±17	20.7%	±15.0
Other Indo-European languages	1,497	±393	2.4%	±0.6	1,180	±320	78.8%	±9.1	317	±169	21.2%	±9.1
5 to 17 years old	301	±141	0.5%	±0.2	189	±114	62.8%	±19.8	112	±71	37.2%	±19.8
18 to 64 years old	1,094	±327	1.8%	±0.5	894	±268	81.7%	±8.5	200	±119	18.3%	±8.5
65 years old and over	102	±51	0.2%	±0.1	97	±51	95.1%	±5.8	5	±5	4.9%	±5.8
Asian and Pacific Island languages	539	±145	0.9%	±0.2	386	±135	71.6%	±16.2	153	±97	28.4%	±16.2
5 to 17 years old	151	±74	0.2%	±0.1	142	±80	94.0%	±14.7	9	±18	6.0%	±14.7
18 to 64 years old	340	±116	0.5%	±0.2	215	±99	63.2%	±21.7	125	±86	36.8%	±21.7
65 years old and over	48	±44	0.1%	±0.1	29	±27	60.4%	±39.4	19	±28	39.6%	±39.4
Other languages	379	±141	0.6%	±0.2	309	±94	81.5%	±11.9	70	±65	18.5%	±11.9
5 to 17 years old	50	±46	0.1%	±0.1	46	±44	92.0%	±17.0	4	±8	8.0%	±17.0
18 to 64 years old	301	±123	0.5%	±0.2	245	±81	81.4%	±14.1	56	±59	18.6%	±14.1
65 years old and over	28	±29	0.0%	±0.1	18	±23	64.3%	±43.6	10	±15	35.7%	±43.6

CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	52,652	±323	(X)	(X)	52,335	±341	99.4%	±0.2	317	±124	0.6%	±0.2
Speak only English	50,722	±413	96.3%	±0.5	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	1,930	±281	3.7%	±0.5	1,613	±268	83.6%	±6.2	317	±124	16.4%	±6.2
Spanish	741	±163	1.4%	±0.3	613	±160	82.7%	±7.5	128	±53	17.3%	±7.5
Other languages	1,189	±249	2.3%	±0.5	1,000	±238	84.1%	±8.8	189	±109	15.9%	±8.8

U.S. Census Bureau. "Language Spoken at Home." *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601*, 2022, <https://data.census.gov/table/ACSST5Y2022.S1601?g=050XX00US26073>. Accessed on January 26, 2024.

*Factor 2. Determine the frequency with which LEP persons come in contact with Extension programs.*

To assess the frequency with which LEP persons from different language groups have or should have contact with Extension to seek assistance. SCTC will utilize information on the frequency of number of staff requests for translation or interpretation funding assistance.

In the past 12 months, there have been no request for translation of documents or curriculum or to provide an interpreter at an event, no requests for translated materials from visitors to our website and there were not known requests for services from LEP populations to attend outreach events/programs/activities.

*Factor3. Determine the nature and importance of the programs, activities, and services provided by Extension to LEP persons.*

To determine the nature and importance of programs, activities, or services provided to LEP persons, SCTC identified programs and services that would have serious or life-threatening consequences if language prevented or delayed an LEP person’s access to outreach event/programs/activities.

In the past 12 months, no programs or services were identified that would have serious or life-threatening consequences if language prevented or delayed an LEP person’s access; and no compulsory programs and services were identified. However, to ensure individuals who are LEP have meaningful access to Extension programs and services, outreach materials may require translation depending on the identified program audience and composition of the geographic area where the program is to be held. The decision to translate outreach materials or provide interpretation services will be made on a case-by-case basis.

*Factor 4. Determine the resources available for LEP services and associated cost.*

To determine the resources available to assist LEP persons and the costs associated with those resources, SCTC will explore the most cost-effective means of delivering competent and accurate language services.

As a result, SCTC will use state approved interpretation and translation vendor contracts for its interpretation and translation needs. Resources and costs may also be reduced by hiring bilingual staff, contracting with local government or community organizations.

**Services to LEP Persons**

The four-factor analysis necessarily implicates a mix of language access services required. Identified language access services will be provided to program participants free of charge. SCTC will explore various ways to deliver and provide effective languages services to the persons in the counties and areas that are served. The services can range from oral to written translation based on request and availability of services. The correct mix will be based on what is both necessary and reasonable. Regardless of the type of language service provided, quality and accuracy of those services to critical to avoid serious consequences to LEP persons.

### **Identification of LEP Persons who need Language Assistance**

At the point of contact with an LEP person, employees will determine whether the person has limited English proficiency, determine his or her primary language and implement or procure the appropriate language assistance service. The primary methods to identify LEP persons who require language assistance services are using “I Speak” language identification cards or posters and self-identification during program registration. In addition, posting notices in commonly encountered languages notifying LEP persons of language assistance may be used to encourage self-identification.

### **Selecting Language Assistance Services**

SCTC Extension programs will explore language assistance to LEP persons when the need arises. The quality and accuracy of the language service is critical to avoid serious consequences to LEP persons. When language services are needed, they will be provided in a timely manner and at no cost to the LEP individual.

Although programs should not plan to rely on an LEP person’s family members, friends, or other informal interpreters to provide meaningful access to important programs and activities, where LEP persons so desire, they shall be permitted to use, at their own expense, an interpreter of their own choosing (whether a professional interpreter, family member, friend, or other person of their choosing) in place of or as a supplement to the free language services expressly offered by SCTC based on their request.

### **Providing Notice to LEP Persons**

To ensure that members of LEP communities are aware of the free language assistance services provided to them, the following marketing and outreach steps will be taken. Notice will be provided to the public that language services are available, and the services are free of charge. Notices will be provided using the following methods:

- Posting “I Speak” posters at program locations so LEP persons can learn how to access language services at initial point of contact.
- Stating in outreach documents that language services are available.
- Working with community-based organizations and other stakeholders to inform LEP individuals of programs and services including the availability of language assistance.

### **Training**

All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of New Employee orientation and refresher training will be provided periodically at staff meetings. After completion of the training, staff should understand:

- Their obligation to provide meaningful access to information and services to LEP individuals;
- The protocol for handling various encounters with LEP individuals, as established by this plan;
- How to use the Staff Directory to identify approved bilingual staff members;
- How to access translated materials and interpretation services for provision to LEP individuals.

Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals. In order for a staff member to be approved as bilingual, they must pass a standardized language proficiency exam (or some other assessment of proficiency).

### **Monitoring and Evaluation**

As part of their responsibilities, the Land Grant Office director, with the assistance of the Civil Rights Coordinator at SCTC will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, they will make use of the following mechanisms (choose at least one, may include other not listed here:

- Survey staff on how often language assistance services are used and how they could be improved;
- Conduct customer satisfaction surveys of LEP individuals;
- Observe and evaluate agency interactions with LEP individuals;
- Solicit feedback from community-based organizations and other stakeholders;
- Keep current on community demographics by engaging with local resources;
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- Monitor the agency's response rate to suggestions or requests by LEP individuals;
- Maintain a record of available services for LEP individuals and the frequency of their use;
- Maintain a record of funds and staff time spent on language assistance services.

### **Language Access Complaints**

A complaint to charge of discrimination or harassment can be registered with the Civil Rights Coordinator or the US Department of Agriculture by and person (employee, program or activity participant, job applicant, visitor, volunteer, etc.) who has reason to believe that they have been subjected to or witnessed unlawful discrimination, harassment, or retaliation including national origin discrimination in a federally assisted Extension or Research outreach program or activity. For specific questions or to file a discrimination complaint, please contact:

Complaints, inquiries, or specific requests regarding Title IX or Civil Rights should be made to:

**Saginaw Chippewa Tribal College Title IX Coordinator**

Dr. Gena Qualls, Dean of Institutional Advancement  
5805 East Pickard Street  
Mount Pleasant, MI 48858  
989-317-4760 Ext. 225  
[gqualls@sagchip.edu](mailto:gqualls@sagchip.edu)

**Saginaw Chippewa Tribal College Civil Rights Coordinator**

Mary Pelcher, Dean of Academics  
5805 East Pickard Street  
Mount Pleasant, MI 48858  
989-317-4760 Ext. 265  
[mapelcher@sagchip.edu](mailto:mapelcher@sagchip.edu)

**U.S. Department of Agriculture**

Director, Center for Civil Rights Enforcement  
1400 Independence Avenue, SW  
Washington, DC 20250-9410  
Fax: (202) 690-7442  
Email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

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