

Limited English Proficiency (LEP) Plan
Polk County Social Services
Effective Date: January 2026

1. Purpose

The purpose of this plan is to document the policies and procedures as it applies to providing meaningful access (language access) to individuals with Limited English Proficiency (LEP) while accessing services and information at Polk County Social Services in East Grand Forks, Crookston and McIntosh, MN.

2. Authorities

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000 et seq.; 45 CFR §80, Nondiscrimination Under Programs Receiving Federal Financial Assistance through the U.S. Department of Health and Human Services Effectuation of Title VI of the Civil Rights Act of 1964.
- Section 1557 of the Affordable Care Act (ACA) (Section 1557). <https://www.gpo.gov/fdsys/pkg/FR-2016-05-18/pdf/2016-11458.pdf>
- Office for Civil Rights Policy Guidance, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 68FR 47311 (2003).
<http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/policyguidancedocument.html>
- Department of Justice regulation, 28 CFR §42.405(d)(1), Department of Justice, Coordination of Enforcement of Non-discrimination in Federally Assisted Programs, Requirements for Translation.
http://www.justice.gov/crt/grants_statutes/corregt6.txt
- Bilingual requirements in the Food Stamp program, 7 CFR §272.4 U.S. Department of Agriculture, Food and Consumer Service. <http://www.gpo.gov/fdsys/pkg/CFR-1998-title7-vol4/pdf/CFR-1998-title7-vol4-sec272-4.pdf>
- Communications Services, Minnesota Statutes § 15.441, subd (1), (2), (3), (4).
<https://www.revisor.leg.state.mn.us/statutes/?id=15.441&format=pdf>
- Information for persons with limited English language proficiency, Minnesota Status §256.01 subd 16.
<https://www.revisor.mn.gov/statutes/?id=256.01>
- National Standards for Culturally and Linguistically Appropriate Services (CLAS) in Health and Health Care. <https://www.thinkculturalhealth.hhs.gov/assets/pdfs/EnhancedNationalCLASStandards.pdf>

3. Definitions

- **Culturally appropriate services** – Is the utilization or application of services, testing, and any other methodology that does not have the effect of subjecting individuals with LEP, and/or their families to discrimination because of their race, color, or national origin, or do not have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.- 45 CFR 80.3(b)(2).
- **Effective communication** - In a healthcare and social services delivery settings such as financial services, child support, fiscal and social work, effective communication occurs when provider staff have taken the necessary steps to make sure that a person with Limited English Proficiency is given adequate information to understand the services and benefits available and receives the information and services for which they are eligible. Effective communication also means that a person with Limited English

Proficiency (LEP) is able to communicate the relevant circumstances of their situation to the provider, and for the provider has access to the adequate information to do their job.

- **I Speak Cards** - “I Speak” Cards say both in English and target language “I need a (target language) interpreter.”
- **Individual with Limited English Proficiency (LEP)** – A person with Limited English Proficiency or “LEP” is not able to speak, read, write, or understand the English language well enough to allow them to interact effectively with healthcare, social services agencies, and other providers.
- **Interpreting** - Interpreting means the oral, verbal or spoken transfer of a message from the source language into the target language. There are different modes of interpreting such as consecutive, simultaneous, sight-translation, and summarization.
- **Language Block (LB)** – Is a block of text that informs readers, in ten different languages, how they can get free help interpreting the information on a particular document or included as an insert in appropriate documents.
- **LEP Implementation Team** - Individuals appointed by Karen Warmack to review LEP Implementation activities within Polk County Social Services.
- **Meaningful access** - Meaningful access to programs, information, and services is the standard of access required of federally funded entities to comply with language access requirements of Title VI of the Civil Rights Act of 1964. To ensure meaningful access for individuals with Limited English Proficiency, service providers must make available to clients and their families language assistance that is free of charge and provided without undue delay resulting in accurate and effective communication.
- **Office for Civil Rights (OCR)** - The Office for Civil Rights is the civil rights enforcement agency of the U.S. Department of Health and Human Services. OCR Region V is the regional office that enforces Title VI in Minnesota for health and human services agencies and providers.
- **Primary languages** - Primary languages are the languages other than English that are most commonly spoken by clientele as identified by Polk County Social Services collection of demographic data. Currently there is one primary language: English.
- **Qualified Bilingual staff** - Is the person who has met and demonstrated the minimum linguistic proficiency and fluency requirements in both languages (target and source languages), AND has demonstrated cultural responsiveness, AND Polk County Social Services has documented the above.

If the bilingual staff is going to act as interpreter for others, the above criteria are required, AND at least 8 hours annually of interpreting Continuing Education (CE), AND at least one of the following documented by Polk County Social Services:

The bilingual staff:

- i. Is a Healthcare Certified Interpreter (CHI, or CoreCHI), Certified Medical Interpreter (CMI), Federal or State Court certified interpreter?
- ii. has received healthcare interpreting training (minimum of 40 hours)
- iii. has received community interpreting training (minimum of 40 hours)

- iv. has developed skills and abilities as an interpreter
- v. understands boundaries and roles as an interpreter
- vi. abides by the National Code of Ethics and Standards of Practice for Healthcare Interpreters by NCIHC, or Canons and professional code of ethics
- vii. Polk County Social Services keeps documentation of the above readily available upon request, audits, or in the process of investigations.

- **Qualified Interpreter** - A person who either has met training and competency requirements, or who is a certified healthcare, certified federal or state court interpreter and in good standing before their certifying body, AND adheres to the interpreter National Code of Ethics and Standards of Practice for Interpreters in Health Care (National Council on Interpreting in Health Care –NCIHC), the canons of ethics or the conduct for court interpreters, etc.
- **Sight translation** - The verbal translation (transfer) of a written document from the source language into the target language.
- **Translation** - Translation means the written transfer of a message from the source language into the target language.

4. **Methods of Providing Services to individuals with LEP**

The primary methods used are Language Line Services and bilingual staff if employed and qualified.

Contracted Qualified Interpreters: Leonor Valderrama de Sillers, 218-233-7841

Telephone Interpreter Services: We contract with Language Line Services.

Video Remote Interpreting (VRI) Services: we do not contract with any video remote interpreting services.

Bilingual staff: we do not currently have any bilingual staff who meet the requirements above.

LEP Liaison & Coordinator: LeAnn Holte – leann.holte@polkcountymn.gov

LEP Liaison Back-up: Jon Street and Betty Solie – Jonathon.street@polkcountymn.gov and betty.solie@polkcountymn.gov

5. **Interpreter Services**

Polk County Social Services, without undue delay and at no cost to individuals with LEP and/or their families, provides meaningful access to information and service to all individuals with LEP and/or their families receiving services.

6. **Translation of Documents**

Polk County Social Services contracts qualified translators or translating agencies to assist individuals with LEP in translating all vital documents, or documents needed to perform services.

7. **Dissemination and Mandatory Training to Agency Staff , Volunteers, and Others**

Polk County Social Services is committed to providing LEP training to:

- All staff at new employee orientation, AND
- At least once a year to all staff, volunteers, and contractors

Polk County Social Services will keep record of those training sessions and individual record of attendance to training will be part of personnel files. Record of this training will be kept for a minimum of five years and readily available during DHS audits, investigations, or any proceeding and as required by the law.

This training is to include at least the following:

- Title VI of the Civil Rights Act of 1964
- How to work effectively with interpreters, and
- Any other cultural issues related to delivery of information and services to individuals with LEP served by Polk County Social Services.

This policy is added to the Manual of Policies and Procedures of Polk County Social Services.

Dissemination of Language Access Information in Public Areas

Polk County Social Services makes available to individuals with LEP:

- Notice of language access services by posting in public areas the “[Language Poster](#)”, available through DHS public Web site (<https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-4739-ENG>)
- “[I need an interpreter](#)” card available in ten languages and from DHS public Web site (<https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-4374-ENG>)
- Catalogue of Languages (<https://edocs.dhs.state.mn.us/lfserver/Legacy/DHS-4059-ENG>)

8. Annual Review of LEP Plan

Polk County Social Services reviews annually its LEP plan to adjust or modify its contingencies based on demographic data collected by Polk County Social Services during its delivery of information and services to individuals with LEP throughout the year.

Polk County Social Services upon DHS request will complete and submit DHS LEP Plan review on an annual basis or as often as requested by DHS.

9. Collection of Data & Its Analysis

Polk County Social Services is committed to monitor and make reasonable adjustments to comply with Title VI requirements. Polk County Social Services will collect:

- Data regarding language line usage.
- This data will be used to determine what languages an interpreter is most often needed.
- The outcome will be to determine if it would be beneficial to the agency and the client, based on the above data, to contract with an in-person interpreter for the identified language(s) above.

10. Complaint Process:

Individuals with LEP have the right to file a formal complaint with:

- Polk County Social Services:
 - Karen Warmack
218-470-8405
612 N Broadway, Room 302
Crookston, MN 56716
Karen.warmack@polkcountymn.gov

- Minnesota Department of Human Services (DHS), Limited English Proficiency (LEP) Coordinator:
 - Alejandro Maldonado
651-431-4018
P.O. Box 64997
Saint Paul, MN
55164-0997
alejandro.maldonado@state.mn.us
Fax 651-431-7444
MN Relay 711 or 1-800-627-3529
- Office for Civil Rights (OCR), Region V – Chicago, IL
 - Celeste Davis, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
233 N. Michigan Ave., Suite 240
Chicago, IL 60601
Voice Phone (800) 368-1019
FAX 312-886-1807
TDD 800- 537-7697
 - <http://www.hhs.gov/ocr/civilrights/complaints/index.html>

This LEP Plan is available in public areas of Polk County Social Services, to all staff, volunteer, and contractors, and to members of the community.

Revisions to this LEP Plan

Creation Updated January 2026 By LeAnn Holte

No changes made at this time as this is the creation of the new version of the LEP plan.

First Revision

Second Revision

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Attachment A: Interpreter Services

Attachment B: How to find and work with interpreters (DHS 7916)

Interpreter Services

Language Interpreter Services:

By Phone:

- Language Line Services
 - 1-800-774-4344
 - Languages: Multiple
 - Reference: Language Line Quick Reference Guide
 - Code 612 for Income Maintenance
 - Code 712 for Social Services
 - Code 812 for Child Support

In person:

- International Translation Services – Leonor Valderrama de Sillers
 - Languages: Spanish; Arabic; Bosnian; Swahili; Nepali; Kurdish; Somali; others
 - Based out of Moorhead
 - 218-233-7841
 - Reference: International Services _ Moorhead _ Information
 - Referral Request form: International Translation Services _ Interpreter Request
- Minnesota Court interpreters
 - www.mncourts.gov
 - Languages: Multiple
 - Reference: MN Court Interpreters _ how to locate interpreter list

Sign Language (ASL) Interpreter Services:

In person:

- ASLIS – Sign Language Interpreters
 - American Sign Language
 - Reference: ASL _ Sign Language interpreter Services _ information
 - Referral Request form: ASL – Sign Language interpreters _ Request form _ ASLIS

Other interpreter information:

Pocket Talkers / Personal Amplification Device:

- Device to help you communicate with those that are hard of hearing.
- One (1) device is Located in each office: Crookston, East Grand Forks, & McIntosh
- Reference: Pocket Talkers _ Personal Amplification Devices

How to find and work with interpreters

The Americans with Disabilities Act (ADA) requires state and local governments, businesses and nonprofit organizations to provide communication access to people who are deaf and hard of hearing. For many deaf people, this means providing an American Sign Language/English interpreter.

Step 1: Find an interpreter

Collect the details

- Name, address and telephone number of a contact person for confirmation and billing.
- Date and time interpreter is needed. Events longer than two hours may require two interpreters.
- Event location and address.
- Number of participants who are Deaf and hard of hearing and their names.
- Type of event. Events with many speakers or technical content may require two interpreters.
- Type of interpreter needed. See our [Types of interpreters](#) fact sheet for more information.

Contact an interpreter referral agency

- Select an agency.
 - Find a current list of interpreter referral agencies serving your area on our website.
 - Consider contacting more than one agency. This is especially helpful in Greater Minnesota where there are fewer interpreters.



- Ask for the agency's cancellation policy and payment procedures.
 - Cancellations after the cancellation deadline often require full payment.
 - If you need to cancel, contact the agency as soon as possible to avoid being billed.
- Contact an agency at least two weeks prior to the event date for best results.

Watch for confirmation

- Watch for a confirmation from the agency with the name of the interpreter(s).
- When you receive confirmation from one agency, cancel your request to other agencies to avoid double booking (and double billing).
- Follow up with the agency if you do not receive a confirmation.

Step 2: Work with the interpreter

Meet with the interpreter beforehand

- Discuss unique vocabulary, technical terms, acronyms, jargon, seating arrangements, lighting and other needs.
- Provide the interpreter with any written materials ahead of time.

Reserve seats for the deaf or hard of hearing participants

- Provide a clear view of the speaker and interpreter.
- Deaf or hard of hearing participants may still choose to sit elsewhere.

Offer the interpreter space near the speaker or action

- This allows deaf or hard of hearing participants to pick up visual cues and expressions of the speaker and see any presentation materials.
- In small group discussions, consider using a circle or semi-circle seating arrangement instead of a theater-style arrangement.

Provide good lighting

- Good lighting helps the participants see the interpreter clearly.
- Do not place the interpreter in front of a window if blinds cannot be adjusted.
- If lights will be turned off or dimmed, make sure the interpreter can still be seen clearly. If necessary, use a spotlight or small lamp to direct light toward the interpreter.

Speak naturally

- Speak at your normal pace. Interpreters will ask you to slow down or repeat if necessary.
- Interpreters listen for concepts and ideas, not just words, to render an accurate interpretation.

Know that everything the interpreter hears will be interpreted

- Do not ask the interpreter to censor any portion of the conversation.
- Ask the deaf or hard of hearing person directly if they are following the conversation.

Ask participants to speak one at a time

- An interpreter can only interpret for one speaker at a time. Remind the group to take turns speaking.
- If you are facilitating a group discussion, be aware that the interpreter will be several seconds behind. Pause before recognizing the next speaker to allow the interpreter to finish with the current speaker.
- Ask participants to identify themselves by name before speaking.

Talk directly to the deaf or hard of hearing person

- Maintain eye contact with the deaf or hard of hearing person.
- Speak directly to the deaf or hard of hearing person.
- Avoid directing comments to the interpreter. Do not say "Tell him..." or "Ask her..."

Do not ask the interpreter to comment on the content of the meeting

- Interpreters follow a code of ethics that requires impartiality and confidentiality with all assignment-related information.
- Do not assume the interpreter knows the Deaf person or will be interpreting future appointments.

Provide a short break every hour

- Interpreting is mentally and physically taxing.
- Do not expect the interpreter to interpret during these breaks.

800-657-3663

Attention. If you need free help interpreting this document, call the above number.

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ملاحظة: إذا أردت مساعدة مجانية لترجمة هذه الوثيقة، اتصل على الرقم أعلاه.

သတိ။ ဤစာရွက်စာတမ်းအားအခမဲ့ဘာသာပြန်ပေးခြင်း အကူအညီလိုအပ်ပါက၊ အထက်ပါနံပါတ်ကိုခေါ်ဆိုပါ။

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Thov ua twb zoo nyeem. Yog hais tias koj xav tau kev pab txhais lus rau tsab ntaub ntawv no pub dawb, ces hu rau tus najnpawb xov tooj saum toj no.

ဟ်သ့ဟ်သးဘၣ်တက့ၢ်, ဝဲန့ၣ်လိၣ်ဘၣ်တၢ်မၤစၢၤကလိလၢတၢ်ကကျိးထဲဲဘၣ်လၢ် တီလၢ်မိတခါအံၤန့ၣ်, ကိးဘၣ်လိတဲခိၣ်ဂံၢ်လၢထးအံၤန့ၣ်တက့ၢ်.

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Hubachiisa. Dokumentiin kun tola akka siif hiikamu gargaarsa hoo feete, lakkoobsa gubbatti kenname bilbili.

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