THE ARC OF THE QUAD CITIES AREA

Language, Cultural Competency and Diversity Plan

PURPOSE

The Language, Cultural Competency and Diversity (LCCD) Plan of The Arc of the Quad Cities Area (The Arc) is designed to address, both broad and specific communicative and cultural needs of the individuals served by and various stakeholders of The Arc. It is the goal that The Arc's services will be delivered will be in a culturally and linguistically sensitive manner. The Arc's LCCD plan recognizes that respecting the diversity of each individuals has a significant and positive impact on outcomes of care through its services. It has developed systems by which care is effectively provided to persons of all cultures, race, gender identity, sexual orientation, marital status, age, community needs, ethnic backgrounds, and religions in a manner that recognizes the values, affirms, and respects the worth of the individuals it serves.

The Arc is committed to establishing multicultural principles and practices throughout its organizational system of services and programs while supporting a culturally and linguistic competent service system. The Arc's mission encompasses services for persons with Intellectual and Developmental Disabilities as well as persons with other disabilities regardless of their socio-economic status, sexual orientation, gender identity, marital status, age, ethnicity, cultural or religious backgrounds.

This plan ensures that persons of different cultural origins and or Limited English Proficiency are not discriminated against nor denied meaningful access to and participation in the programs and services provided by The Arc pursuant to Title VI of the Civil Rights Act of 1964 and the subsequent Acts which prohibit discrimination on the grounds of race, color, sex, religion, national origin, ancestry, marital status, age, gender identity, sexual orientation, disability, or the inability to speak or comprehend the English language. The Arc shall notify such persons that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the provisions of The Arc's LCCD Plan.

The LCCD Plan shall apply to The Arc's programs, services and facilities funded by the Department of Developmental Disabilities and the Department of Rehabilitation Services in Illinois within the counties of Rock Island, Mercer, Henry and Scott County in Iowa.

It is the intent of The Arc that by providing language services to individuals defined by according to the plan, persons will achieve a balance ensuring meaningful access to programs and services, while not incurring undue financial burdens on the agency.

The Arc has designated the Quality Improvement Director as the Chair of the LCCD committee. The committee members are made up of Directors and Managers within The Arc including: Residential, Community Day Services, Work Services, Intake and Quality Supports. The Chair and the committee shall provide oversight for the implementation of The Arc's LCCD Plan, Policy and Procedures; coordinate and facilitate delivery of LCCD services; ensure staff receives initial training on LCCD Plan and corresponding Policy/Procedure. Thereafter, refreshers will occur annually. LCCD training will be offered to new hires during the orientation process. The committee will direct the on-going monitoring and periodic assessment of the LCCD Plan and corresponding policy and procedures, review the LCCD plan at a minimum of annually.

GOALS

The Arc will ensure services are provided in a culturally competent manner to all individuals including those with limited English proficiency.

The Arc's employees, volunteers and programs will effectively provide services to people of all cultures, races, gender identity, sexual orientation, age, marital status, ethnic backgrounds, and religions in a manner that recognizes, values, affirms, and respects the worth of the individuals protecting and preserving the dignity of each.

MISSION

"To empower people with disabilities to believe in their own unique abilities and achieve their full potential by providing quality, innovative services that focus on advocacy, inclusion, independence, employment, meaningful community life and personal happiness."

HISTORY

The Arc of the Quad Cities Area was founded in 1952 by a group of parents who had children with Intellectual and Developmental Disabilities. Through the years it has grown into a complex organization serving approximately 350 individuals and employing 285 staff. The Arc's headquarters is located at 4016 Ninth Street, Rock Island, Illinois. The residential and day program sites are located in the surrounding areas.

The Arc's programs are designed to flexibly meet a wide range of needs through a variety of day program, residential and clinical supports. Residentially, The Arc offers group home living in the form of four (4) to eight (8) bed Community Integrated Living Arrangement (CILA) facilities, Intermittent CILA homes serving individuals in their own apartments, and Personal Support Workers (PSWs) to support individuals in desired areas either in their own home or their family home. Day program supports include both community and center-based activities. In addition, individuals are encouraged to participate in community employment both supported and independent. The Arc's clinical services include Qualified Intellectual Disability Professionals (QIDP's) who also function as Self-Direction Assistants (SDAs), Assistive Technology, and Community Support including Respite.

DEFINITIONS

Cultural Competence: A set of behaviors, attitudes and policies in a system, agency or among professionals that affect cross-cultural work, evolving over time.

Individual Cultural Competence: Acquisition of the values, knowledge, skills and attributes that allows an individual to work appropriately in cross-cultural situations.

Organizational Cultural Competence: Systems and organizations approve, and in some cases mandate, the incorporation of cultural knowledge into policymaking, infrastructure and practice. An example of an LCCD practice would include: requiring written material translated, adapted, and or provided in alternative formats based on needs and preferences of the population served.

Limited English Proficient Person: A person who does not speak English as their primary language and who limited ability to read, speak, write or understand English.

Diversity: Refers to the existence of variations of different characteristics in a group of people. These characteristics could be everything that makes us unique, such as cognitive skills and personaly traits, along with things that shape out identity (e.g. race, age, gender, religion, sexual orientation, cultural background).

Language Access: Assuring language access means providing language assistance services, including bilingual personnel and interpreter services, at no cost to each LCCD person, at key point of contact, in a timely manner. Interpretation and translation services must comply with all relevant federal, state and local mandates governing language access. Individuals must engage in evaluation of language to access and other communication to ensure quality and satisfaction. Importantly, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race. color or nation origin including actions that delay, deny, or provide different quality of services to a particular individual or group of individuals.

Meaningful Access: Providers and their subcontractors, providing services subject to 7C.F.R.& 272.4 (b) are required to take reasonable steps to ensure meaningful access to their services and programs by LCCD Customers. Compliance involves the balancing of four factors:

1. the number and proportion of eligible LCCD individuals,
2. the frequency of contact with LCCD individuals,
3. the importance of impact of the contact upon the lives of person(s) served, and
4. the resources available to the organization, discrimination on the basis of race, color or natural origin, including actions that delay, deny or provide different quality of services to a particular individual or group of individuals.

The four-factor analysis (LCCD Assessment) may be applied to the different types of programs or activities the Provider provides to determine the level of language assistance measures sufficient to assure full compliance or to demonstrate reasonable efforts.

Bilingual/Bicultural: Bilingual/bicultural staff are usually native speakers who, when hired, have had their written and oral fluency on both English and their native language assessed thoroughly. They can communicate directly individuals in their preferred language. Interpreters provide oral language services and, when trained have received training in both consecutive and simultaneous interpretation skills. They have made a commitment to deliver language-service that conform to ethical and professional standards of communication.

Interpreter: A person fluent in English and in the necessary second language who can accurately speak, read, and readily interpret the necessary second language, or a person who can accurately sign and read sign language. Interpreters shall have the ability to orally interpret technical or special terms particular to the situation in which they are providing language services. Interpreters may include members of a professional staff or may be hired contractually from a language service firm.

Translation: Refers to the translation of the written word; qualified translators have experience, education, and training in the art and skills of translation. They have command of English and the target language and are familiar with technical or special terms used in particular disciplines. They are aware of the geographic differences and dialects particular to language groups such that they can determine if they are qualified to translate documents for a particular language group.

PLAN SUMMARY

The Arc of the Quad Cities Area developed the LCCD plan to assist in identifying reasonable steps to provide multicultural and language assistance for individuals defined in the purpose of the plan whom are seeking and or receiving programmatic services as required by the Executive Order 13116. This plan details the procedures on how to identify persons who are culturally diverse and or require language assistance to include ways in which assistance may be provided, training of staff on LCCD plan that includes language assistance and cultural diversity, notifications to LCCD persons that assistance is available, when and how future updates will occur, employment of bi-lingual staff, and complaint procedure and satisfaction of services provided to LCCD person(s). The Arc undertook a four factor LEP analysis which considers the following:

1. The languages spoken by 95% of the population in the four county area The Arc serves.
2. The frequency with which individuals requiring language assistance could come in contact with The Arc programs.
3. The nature and importance of the program, activity, or service provided by The Arc.
4. The resources available to The Arc and the overall costs to provide language assistance.

Four Factor Analysis

Factor 1: Languages Spoken in the Area

The Arc examined data from the US Census Bureau County Quick Facts and American Fact Finder Counties and was able to determine approximately 87% of the population spoke English as their primary language and Spanish and all other languages were spoken at home by approximately 13% of the population. The largest population of speakers of languages less than 'very well' in the four county regions is Spanish.

Factor 2: Frequency of Assistance Requests

The Arc assessed the frequency at which the agency has or could possibly have contact with a person with language and/or needed cultural assistance. Within the last fiscal year 2023 The Arc had one (1) request for a Spanish interpreter and zero (0) requests to translate paperwork into Spanish.

Factor 3: Service Area/Program Need

The Arc is one of the primary agencies in the four county area that provides services to people with Intellectual and Developmentally Disabilities. The nature and importance of the services The Arc provides are vital in assisting persons with language and/or needed cultural assistance to reach their maximum level of independence through training programs, staff support and services. The Arc has materials and resources available to aid in applying for services to include;

a. applications available in different languages;
b. translation services through the internet;
c. I-Speak Cards;
d. interpretation services when needed;
e. handicap assessable accommodations; and
f. cultural/ethnicity needs.

Factor 4: Resources

The Arc assessed available resources that could be used in providing assistance. The resources assessed were as follows; costs of professional interpreters and translations services, translation services through the internet at no cost to the agency, inventory of available organizations The Arc could partner with for outreach and translation efforts to include local colleges and universities foreign language departments at Augustana College, St. Ambrose University and Western Illinois University Quad Cities, examination of financial and in-kind sources available that could be tapped into for assistance and what level of staff training is needed. A local agency, Translation Unlimited can provide Interpreting Services for the following fee: $60.00/hour with a one hour minimum for most languages except: ASL (American Sign Language), Burmese, Chin, Karenic, and French which require a two hour minimum charge. Translations Unlimited has a list of 37 languages they provide translation services in. While identifying what staff capabilities are readily available, it was determined that The Arc staff is very limited in providing informal interpretation for any languages.

After analyzing the four factors, The Arc developed a plan outlined in the following section addressing assistance to people who may need language or cultural assistance.

Identifying a Person in Need of LCCD Assistance

Below are tools to help identify persons who may need language or cultural assistance:

1. Examination of current records for requests for language and/or cultural assistance.
2. The Arc's website will have a notation of the availability of language and cultural assistance at arcqca.org.
3. The Admission's Chair for The Arc will be the first portal of entry for persons requiring language and cultural assistance. The Chair will identify if assistance is needed at the initial contact of the application process for program services. The Chair will determine the extent of assistance needed.
4. "I Speak Cards" will be available at community presentations The Arc is involved with since the cards are an excellent tool to identify language needs for possible future contacts.

Admission's Chair Responsibilities after First Point of Contact

The Admission's Chair will provide all Admission paperwork in the primary language of the applicant. Throughout the Admission process the Admission Chair will be the point of contact for in-coming and out-going information to include all required paperwork and communication in the individual's preferred language.

The Admission's Chair will transfer the individual to the designated QIDP once they have been accepted in to services.

QIDP Responsibilities will be as follows:

1. The assigned QIDP will schedule the pre-admission staffing at their designated program site and ensure there is assistance for their identified language and or cultural needs during the meeting.
2. During the Pre-Admission staffing the QIDP and staffing participants will identify when translation and or cultural services will be required and what written paperwork will need to be provided in the person's primary language. Those identified key times of services

are; annual IHP/Semi-Annual meetings and any other IDT approved meetings and or events.
3. The QIDP will be responsible for ensuring that those identified services are provided at the designated times agreed upon during the Pre-Admission staffing.

Approved translation services can be secured through:

1. Contracted Services
2. Telephone translation services
3. Bi-lingual services
4. Internet translation services approved by the LCCD committee

Language Assistance Measures

When an interpreter is needed, in person or on the telephone, the identified staff person will first determine what language is required. The Census Bureau's "I Speak Cards" are to be located at all major sites of The Arc to include; The Arc Building, Opportunity Center, and Arc Industries.

If possible, the agencies identified staff should first use an online service such as Google Translate (http://translate.google.com/), International Language Services (isltranslations@sbcglobal.net), American Translators Association (www.atanet.og) or a similar service to aid in the interpretation of services on a one on one basis.

If this does not prove feasible, or if a formal interpretation is requested, staff should use the telephone interpreter service, Language Line, available from http://www.languageline.com/. On the language Line home page the Q and or agency identified staff will select the "Need an Interpreter Now" link and follow the directions to receive an access code. The Arc's purchasing card number for method of payment must be provided before an authorization number is given and the staff person is connected with a translator.

In the event The Arc requires translation in-person or at a meeting, local services are to be prioritized over ones from outside the 4-county area, and will be evaluated at the time of such a need.

The Arc's staff training in Language, Cultural Competency and Diversity

All current staff will be provided with access to the agency's approved LCCD plan and will receive training on it to include the LCCD Policy and Procedures and available resources. This information will also be a part of The Arc's agency's required identified staff orientation process for new hires. Training topics are listed below:

1. Understanding the Title VI policy and LCCD responsibilities of The Arc including review of the plan.
2. Use of "I Speak Cards".
3. Documentation of language assistance requests.
4. How to handle a complaint.

Staff will be trained at their yearly Enrichment Retreats on any updates and changes made to The Arc's LCCD plan and if there were no updates and or changes during the time period there will be a general refresher overview.

Personnel Strategies used to recruit, retain and promote at all levels, diverse personnel, and leadership that are representative of the demographic characteristics of the service area.

The Arc will recruit, retain and promote diversity at all levels as described in the agency's Affirmative Action Plan.

The Affirmative Action Plan will be monitored throughout the year and will be evaluated annually to ensure its effectiveness and representation of our community.

The Arc will recruit and provide opportunities within to build an internal pool of employees who will be available to provide translation services to those we serve. The Arc will give preference to candidates who can communicate in other languages or forms of communication beyond English and will provide training opportunities to employees who which to acquire such skills.

Outreach Techniques

When The Arc staff complete presentations in the community and or are hosting a meeting, conference or class with known persons with language and/or cultural needs, presenters will have fliers, advertisements and agendas printed in the person (s) primary language and/or have interpretation services available based on known needs of the population attending.

When The Arc is sending e-mails using The Arc mailing lists there will be a statement at the end of every e-mail; "Persons who require special accommodations under the American with Disabilities Act or require translation services (free of charge) will need to contact The Arc at 309-786-6474. A minimum of one week advance notice is required before an event is needed to arrange for services and or accommodations.

Dissemination Plan

There will be a statement on The Arc website, "persons who require special accommodations under the American Disabilities Act or persons who require translation services (free of charge) should contact The Arc at 309-786-6474. A minimum of one week advance notice is required before the scheduled event to arrange for services and or accommodations.

All e-mails from The Arc mailing list will include the statement from the above bullet.

All of The Arc's admission written communication and required paperwork will include the statement from the first bullet point.

All program handbooks of The Arc will include the statement from the first bullet point.

Telephone answering messages and voice mail menus shall include brief LCCD service availability in the most commonly spoken languages.

The Arc's application for employment will include a section inquiring if applicant is bi-lingual and in what areas of fluency; written, oral and or both.

The Arc's informational pamphlets and brochures will include availability of LCCD services and those will be made available in the LCCD"s primary language when needed.

Language, Cultural Competency and Diversity Compliant Resolution Procedure

The Arc's current Individual Complaint Resolution Procedure and Appeal Procedure will apply to person(s). *(See attached The Arc of the Quad Cities Area Individual Complaint Resolution Procedure and Appeal Procedure)*

Quality Assurance

The plan is designed to be flexible and is one that can be easily updated. At a minimum The Arc will follow the Title VI Program update schedule for the LCCD Plan.

Each update should examine all plan components to include:

1. How many persons were encountered requiring language, cultural assistance and diversity?
2. Were their needs met?
3. Has there been a change in the types of languages where translation services are needed?
4. Availability of new resources including technology.
5. Is there still a need for continued LCCD assistance for previously identified programs in The Arc? Are there other programs that should be included?
6. Have The Arc's available resources, such as technology, staff, and financial costs changed?
7. Has The Arc fulfilled the goals of their LCCD plan?
8. Annual review of census data.
9. Is existing linguistic, language and diversity services meeting the needs of persons?
10. How well The Arc understands and has implemented the LCCD Plan, policies and procedures through review of person(s) yearly satisfaction survey results.
11. Were there any complaints filed?

List of individual related materials, documents, and signage that are in languages of commonly encountered groups (specific language) represented in the service area.

1. Application for Admission – English/Spanish
2. Authorization to Release Information – English/Spanish
3. Individual Rights – English/Spanish
4. Acceptance letter in to The Arc programs – English/Spanish
5. "I Speak" cards – English/Spanish French/ Dutch/Vietnamese
6. Overview of programs available – English/Spanish
7. Individual Complaint Procedure