City of Richmond – Language Access Plan

Executive Summary

The City of Richmond is committed to improving accessibility to its programs and services for non-English speakers and individuals with Limited English Proficiency (LEP). Recognizing that language barriers can limit civic participation and access to essential services, this Language Access Plan (LAP) prioritizes equity, civic engagement, and the elimination of communication barriers. Building upon previous updates in 2017, 2018, and the draft from July 2024, this iteration establishes a comprehensive framework for continuous improvement and inclusive service delivery across all City departments.

To ensure meaningful access, the City is implementing a multi-faceted strategy that includes expanding translation and interpretation services, providing staff training, and enhancing digital accessibility. Programs and services will be tailored to meet the needs of LEP residents, individuals who are deaf or hard of hearing, and those who require alternative language accommodations. In compliance with Title VI of the Civil Rights Act of 1964[1], Executive Order 13166, and Administrative Regulation 5.24, the City is reinforcing its commitment to eliminating discrimination and ensuring that all residents can engage fully with local government services.

Although *Executive Order 13166* has been rescinded[2] and the Department of Justice has withdrawn its formal guidance on language access services, the City of Richmond continues to operate in alignment with those prior standards. The City recognizes the value of these frameworks in ensuring meaningful access for individuals with Limited English Proficiency (LEP) and is voluntarily upholding their principles as best practices[3]. This includes continued reliance on Title VI of the Civil Rights Act of 1964 and the DOJ's Four-Factor Analysis as tools for structuring services, assessing needs, and setting priorities. By maintaining these benchmarks, Richmond reaffirms its commitment to advancing equity, accountability, and inclusion, even in the absence of current federal mandates.

A key component of this plan involves needs-based strategies that assess service priorities through tools like the DOJ's four-factor analysis, ensuring that language services align with LEP population size, frequency of contact, and the significance of services. The City will enhance its language access services by expanding on-demand interpretation (telephonic, video, and in-person) and increasing the translation of vital

---

[1] Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.; see DOJ Title VI Overview. *Short form:* 42 U.S.C. § 2000d.

[2] Executive Order No. 14224, *Designating English as the Official Language of the United States* (Mar. 1, 2025) (revoking EO 13166), 90 Fed. Reg. 11363 (Mar. 6, 2025), available at the Federal Register. *Short form:* EO 14224 (2025).

[3] DOJ's 2002 LEP Guidance was rescinded in 2025 consistent with EO 14224; agencies continue to emphasize needs assessment and capacity (e.g., FEMA Language Access Policy, 2023). *Short form:* DOJ Rescission (2025).

documents. Additionally, a structured capacity-building initiative will provide annual training for staff on language access policies, cultural competency, and best practices for working with interpreters and translators.

To ensure continuous improvement, the City will establish metrics for success, including vendor performance reviews, client satisfaction surveys, and regular feedback mechanisms, allowing for the refinement and enhancement of language services. Collaborative implementation will be essential, with departmental language access liaisons and newly introduced roles, such as the Multicultural Outreach Navigator, working to expand service capacity. Sustainable funding and resource allocation will be evaluated, with efforts to seek partnerships and grants to strengthen language access services across all departments.

The Office of Immigrant and Refugee Engagement (OIRE) will oversee the implementation of the LAP, ensuring that City departments, agencies, and community partners receive the necessary training, resources, and support. Staff will participate in ongoing training on language access policies, with additional guidance provided as needed. By integrating language access into all aspects of City operations, Richmond is reaffirming its commitment to equity, inclusion, and meaningful access for all residents.

This executive summary provides an overview of the City's Language Access Plan, outlining its goals, strategies, and implementation framework. For further details, please refer to the full Language Access Plan (LAP).

II. Introduction

The City of Richmond is committed to ensuring equitable access to its programs, services, and civic engagement opportunities for all residents, regardless of their language proficiency or communication needs. With a diverse and multilingual population, the City recognizes that language barriers can prevent individuals from fully accessing essential services, understanding important information, and participating in community life. The Language Access Plan (LAP) establishes a framework for meaningful access to City services for Limited English Proficient (LEP) individuals and those with communication disabilities, ensuring that language is never an obstacle to receiving public services.

A. Demographic Context

With a population of approximately 226,000 residents, City of Richmond is a linguistically and culturally diverse city. While English is the primary language spoken, 12.8% of residents speak a language other than English at home[4], and 5.9% are

---

[4] **U.S. Census Bureau, ACS Table S1601 – Language Spoken at Home** (*Richmond city, VA*), most recent release (e.g., **2023 5-year estimates**). Link: data.census.gov (S1601 profile for Richmond city). *Short form:* **ACS S1601 (Richmond, VA)**

considered Limited English Proficient (LEP), meaning they speak English "less than very well".[5] and require language assistance to access City services.

The most commonly spoken non-English languages in Richmond include Spanish, Arabic, Vietnamese, French, Mandarin, and Dari, with Spanish speakers representing the largest LEP group at 10.5% of the total population. The City has also seen a growing immigrant and refugee population, particularly from Latin America, the Middle East, and Southeast Asia, increasing the demand for language access services.

Based on updated data from Richmond Public School (2022-2023) and the Language Line Report (2024-2025), the number of Spanish-speaking LEP individuals in Richmond may now be closer to 6.2% of the total population. The high demand for Spanish interpretation services—including over 10,500 requests in schools and 3,837 calls via Language Line—indicates that the City's Spanish-speaking LEP community is growing, emphasizing the continued need for language assistance programs and accessibility efforts.

Beyond spoken languages, the City of Richmond is committed to ensuring accessibility for individuals with disabilities, including those who are deaf, hard of hearing. To comply with the Americans with Disabilities Act (ADA) title II[6], the City provides American Sign Language (ASL) interpretation for individuals who require it.

III. Legal and Regulatory Framework

The City of Richmond's Language Access Plan (LAP) operates under a robust legal and regulatory framework that ensures meaningful access to programs, services, and activities for individuals with limited English proficiency (LEP). This framework includes federal mandates and local policies designed to uphold equity and prevent discrimination.

A. Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964[7] prohibits recipients of federal financial assistance, including the City of Richmond and its departments, from discriminating based on race, color, or national origin. As defined by federal guidance, discrimination based on national origin occurs when failure to provide meaningful

---

[5] **U.S. Census Bureau**, **ACS Table S1601 – Language Spoken at Home** (*Richmond city, VA*), "Speak English less than 'very well'," most recent release. *Short form:* **ACS S1601 (Richmond, VA)**.

[6] **28 C.F.R. Part 35** (ADA Title II), see **§ 35.160** (effective communication) and Subpart E (Communications), eCFR. *Short form:* **28 C.F.R. pt. 35**.

[7] **Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.**; see DOJ **Title VI Overview**. *Short form:* **42 U.S.C. § 2000d**.

access to individuals with limited English proficiency (LEP) in federally assisted programs and activities.

To comply with Title VI, the City is committed to ensuring that LEP individuals can effectively access and participate in services funded by federal assistance, removing language barriers that may impede equitable engagement.

Executive Order 13166: A Lasting Framework for Language Access

Originally issued in 2000, Executive Order No. 13166—*"Improving Access to Services for Persons with Limited English Proficiency"*—expanded on Title VI of the Civil Rights Act by mandating that federal agencies and recipients of federal funding take meaningful steps to ensure language access.

While this Executive Order has since been rescinded at the federal level, the City of Richmond continues to uphold its framework as a guiding blueprint for ensuring equitable access across all City services. We recognize its foundational role in shaping fair, inclusive policies and remain committed to its core mandates:

- Assessing and addressing language access needs across departments and services
- Implementing systems that ensure LEP individuals can participate fully in programs and activities
- Ensuring that recipients of federal funds provide meaningful language access to LEP applicants and beneficiaries.

Although the U.S. Department of Justice has also withdrawn its formal guidance on language access services[8], Richmond continues to rely on those standards—particularly the DOJ Four-Factor Analysis—as a practical and equitable model for service delivery. By continuing to follow these benchmarks, the City reaffirms its responsibility to serve all members of the community, regardless of the language they speak.

B. **Definition of LEP Individuals**

An LEP individual is defined as a person who does not speak, read, write, or understand the English language at a level sufficient for effective communication with the City's programs, services, or activities. LEP status is self-identified, and any

---

[8] U.S. Dept. of Justice, **Notice of Rescission of Guidance to Federal Financial Assistance Recipients Regarding Title VI...LEP Persons**, **90 Fed. Reg.** (Apr. 15, 2025), available at govinfo; see also DOJ memo implementing EO 14224. *Short form:* **DOJ Rescission (Apr. 15, 2025)**.

individual who requests assistance under this category will benefit from the provisions of this LAP.

C. **Local Commitment: Administrative Regulation 5.24**

The City of Richmond affirms its commitment to language access through its Language Access Policy (Administrative Regulation 5.24)[9]. This policy sets forth procedures and standards designed to ensure that residents with limited English proficiency (LEP) can access services equitably. It also serves as the foundation for implementing the Language Access Program (LAP). The complete policy is available here (Administrative Regulation 5.24 Language Access Policy_19MAY2023.pdf)

D. **Scope of the Language Access Plan**

While this LAP provides comprehensive guidance for ensuring language accessibility, it does not create individual rights or entitlements beyond those already established by applicable federal, state, or local laws. Instead, it serves as a framework to uphold the City's obligations under Title VI and Administrative Regulation 5.24.

Although the U.S. Department of Justice (DOJ) rescinded its 2002 LEP Guidance (including the "safe harbor" for written translations) on March 21, 2025[10], the City adopts the safe-harbor thresholds below as a best-practice benchmark, not a federal mandate. This standard provides predictability, promotes equity, and complements agency-specific rules (e.g., HHS §1557). This ensures that services normally provided in English are accessible to LEP individuals and do not constitute national origin discrimination under Title VI. As a recipient of federal funds, the City of Richmond remains responsible for ensuring that all residents, especially LEP individuals, those who are deaf or hard of hearing, and those with vision impairments receive the necessary language and communication support to access services without barriers.

IV. Needs Assessment

The City of Richmond Language Access Coordinator (LAC) will collaborate with internal departments and external partners to implement effective communication strategies that address the City's language and accessibility needs. This includes identifying the language and communication services required across City agencies, assessing how residents interact with City services, and evaluating existing multilingual, translation, and

---

[9] **City of Richmond, Administrative Regulation 5.24 – Language Access Policy** (May 19, 2023), Office of the Mayor (PDF). *Short form:* **AR 5.24 (2023)**

[10] **Historic Safe Harbor text.** *Guidance to Federal Financial Assistance Recipients Regarding Title VI… LEP Persons*, **67 Fed. Reg. 41455, 41464** (June 18, 2002) (safe harbor at subsections (a) & (b): **"5% or 1,000 (whichever is less)"**; **"< 50 persons"** → notice of free oral interpretation). *Short form:* **67 FR 41464 (2002)**.

interpretation resources available to support LEP individuals and those who are deaf, hard of hearing, blind, or visually impaired.

As part of the Language Access Plan (LAP), the City will develop and enhance accessibility resources, including American Sign Language (ASL) services and Braille documents upon request, to ensure that all residents, regardless of their communication abilities, have equitable access to City programs and services.

Population Analysis: LEP Communities in Richmond

While Executive Order 13166 is no longer in effect, the City of Richmond upholds the Four-Factor Analysis.[11] developed by the U.S. Department of Justice as a best-practice tool for evaluating and meeting the needs of individuals with Limited English Proficiency (LEP). This framework continues to guide our language access efforts by helping departments to:

The Four-Factor Analysis:

1. Assess the number or proportion of LEP individuals:
    - Evaluates the size and diversity of the LEP population within Richmond's service area.
    - Helps identify the range of languages spoken and determine which languages require translation and interpretation services.
2. Evaluate the Frequency of Contact with LEP Individuals:
    - Assesses how often LEP individuals interact with City services and programs.
    - Determines the level of language assistance needed to minimize barriers to service access.
3. Determine the nature and importance of Service, Benefit, or Information to LEP Individuals:
    - Considers the significance of a program, service, or document for LEP individuals.
    - Recognizes the impact of inadequate language services, particularly for essential services such as healthcare, housing, and legal support.
4. Consider the Resources Available & Cost Considerations:
    - Balances the effectiveness of language services with available financial and operational resources.

---

[11] DOJ's 2002 'LEP Guidance' (67 FR 41455) was rescinded on Mar. 21, 2025, per DOJ notice (Federal Register, Apr. 15, 2025), consistent with Executive Order 14224 (Mar. 1, 2025). Agencies continue to emphasize needs assessment and capacity (see FEMA, *Language Access* Policy, Mar. 8, 2023)

- Ensures that the City prioritizes high-impact services while remaining fiscally responsible.

By applying this analysis, the City of Richmond can effectively assess, prioritize, and implement language access measures that reflect both community needs and resource constraints. The integration of these four factors into Language Access Policy A.R. Number: 5.24 highlights the City's commitment to equitable service delivery.

The City of Richmond takes an inclusive approach to language access, ensuring that LEP individuals receive equitable service. The U.S. Census Bureau's 2022 American Community Survey reports that 12.8% of Richmond residents (24,474 individuals) speak a language other than English at home. Based on this data, the City has developed a robust policy that includes the following key provisions:

- Diversity of LEP Population: Recognizing the linguistic diversity of Richmond's LEP residents, ensuring language access efforts align with community needs.
- Tailored Language Access Mandate: Extending language access beyond federal minimum requirements to ensure that all public-facing services in Richmond are accessible in multiple languages.
- Supplemental Languages Based on Census Data: Identifying languages that meet the 5% threshold of Richmond's LEP population.
- Consideration of Lesser Diffused Languages: Acknowledging the limitations of Census data and committing to addressing the needs of individuals who speak Indigenous or less commonly spoken languages.
- Translation Criteria for Communications: Establishing that documents and communications must be translated into languages spoken by at least 5% of a program's eligible population, with Spanish currently meeting this threshold.
- Annual Evaluation of Language Services List: Conducting an annual review of Census data and Richmond Public Schools enrollment statistics to ensure the City's language services remain current and responsive.
- Collaboration with Department Liaisons: Partnering with departmental language access liaisons to track service interactions and adjust language access strategies accordingly.

By consistently monitoring demographic changes, refining translation and interpretation criteria, and expanding language services as needed, the City of Richmond ensures that LEP individuals receive effective, culturally competent, and equitable access to public services.

V. Language Access Services and Strategies

The City of Richmond provides 24/7 access to telephonic interpretation in over 240 languages through professional vendors, Language Line Solutions (LLS) and The

Language Group (TLG). Video remote interpretation (VRI) is available for over 200 languages, including American Sign Language (ASL) with Language Line Solutions. In-person interpretation for public events is arranged through the Office of Immigrant and Refugee Engagement (OIRE) and contracted vendors. Annual training familiarizes front-line staff with these resources, and efforts are underway to expand language services to all City sites and field staff.

The Office of Immigrant and Refugee Engagement (OIRE) manages language services for community events and City Council. The Language Access Coordinator (LAC) works with City programs to assess language needs using programmatic and community-level data. This ensures that appropriate in-person interpreters are secured and that translated materials effectively reach target populations.

To reduce disparities for Limited English Proficient (LEP) residents, Richmond provides high-quality language services through vendor-provided interpretation, translation, and multilingual staff. Under the City's Language Access and bilingual policies, staff must pass a professional fluency assessment managed by the Department of Human Services to deliver services in a language other than English. Annual staff training ensures that employees understand best practices for selecting the appropriate interpretation method—telephonic, in-person, or multilingual staff—based on the specific needs of the client.

To identify the primary language of LEP individuals, the City relies on self-reported data, intake processes, and Richmond Public Schools (RPS) and American Community Survey (ACS) demographic reports. While a standardized tracking system is still in development, City facilities and walk-in centers collect language preferences during client interactions, using the language line vendor as needed. The Language Access Coordinator consolidates data from multiple sources, including service sites and community partners, to align services with census data and better understand community language needs. During intake, staff may ask clients their preferred language or use a Language Guide Sheet listing 24 languages (Appendix C). Staff fluent in other languages, verified through a professional fluency assessment, may wear "I Speak..." buttons to indicate their proficiency. OIRE collaborates with the digital communications team to ensure translated materials are accessible online and distributed in key community areas.

When interacting with LEP or Deaf/Hard of Hearing (D/HOH) individuals, staff should assess the need for language assistance services at the initial point of contact. This can be determined by:

1. Voluntary self-identification by the individual or their companion.
2. Affirmative inquiry into the individual's primary language if assistance is needed.
3. Engagement of a qualified multilingual staff member or interpreter to confirm the individual's primary language.

4. Use of an "I Speak" language identification card or poster.

It is essential to identify the language or communication method that best supports effective communication. This approach considers sensitivity, potential trauma, and the context of the interaction. Staff should avoid assumptions based on race, color, national origin, or D/HOH status and prioritize the individual's expressed preferences.

To uphold high-quality interpretation and translation services, the Language Access Coordinator conducts regular meetings with contracted vendors to assess performance, ensure compliance, and address service gaps. These evaluations maintain accountability and help enhance service delivery across all City departments.

Translation Services

To ensure the translation of essential public documents, the City's Language Access Policy requires each department to appoint a language access liaison. The Language Access Coordinator meets with these liaisons on a quarterly and yearly basis to review and prioritize vital documents for translation.

Vital documents are written materials that directly affect an individual's access to services, legal rights, or vital information. These documents are critical for ensuring that limited English proficient (LEP) residents can fully understand and participate in programs, services, and activities. Examples of vital documents include, but are not limited to:

Vital documents include:

- Public notices regarding the availability of services
- Changes in any program or services
- Consent and waiver forms
- Intake and application forms
- Written instructions on how to obtain services or benefits
- Outreach materials that describe programs or events
- Documents related to legal rights, requirements, or responsibilities

(*Each department is responsible for determining which documents are considered vital within their operations, ensuring that LEP residents have equitable access to the City's resources and information. Programs may also designate additional documents as vital based on risk and impact.*)

City Safe-Harbor Thresholds (written translations).
When a language group in the **eligible service population** meets either condition below, the City (or the specific program) will translate **vital documents** into that language:

1. **≥ 5% or ≥ 1,000 individuals (whichever is less)** of persons eligible to be served or likely to be affected/encountered; **or**
2. If **fewer than 50 individuals** are in a language group that meets the 5% trigger, provide **written notice in that language** of the **free right to competent oral interpretation** of those materials.
   (These thresholds mirror the historic DOJ safe harbor; they are a **strong indicator of compliance**, not a ceiling. Programs must still ensure meaningful access using the Four-Factor framework.)

Documents that meet the **5% language threshold** must be translated, ensuring accessibility for the most affected communities. If a full translation is not feasible due to cost or time constraints, a summary of key content may be provided. All versions of documents should include information about the availability of translations. The U.S. Department of Justice defined vital documents as those necessary for accessing services, receiving benefits, or fulfilling legal obligations.

Standards for accuracy include:

- Ensuring clarity and readability
- Maintaining cultural relevance
- Aligning with legal and service requirements

The Language Access Coordinator collaborates with department liaisons and community data sources, such as Richmond Public Schools (RPS) and the American Community Survey (ACS), to continuously align translation efforts with community needs. During intake, staff may ask clients about their preferred language or use a Language Guide Sheet listing 24 languages (Appendix C). Staff who are professionally assessed as fluent in another language may wear "I Speak…" buttons to indicate their proficiency. Additionally, departments ensure that translated materials are accessible online and distributed to key community locations.

For individuals with Limited English Proficiency (LEP) or those who are Deaf or Hard of Hearing (D/HOH), additional measures are taken. Some individuals may have low literacy in their native language or speak a language without a written form, making written translations ineffective. In such cases, alternative communication methods such as sight translation, interpretation services, or multimedia communication (audio/video) are recommended. D/HOH individuals should be asked about their preferred communication method to ensure accessibility.

To maintain the quality of interpretation and translation services, the Language Access Coordinator holds regular meetings with contracted vendors to assess performance, address issues, and ensure compliance with City standards. Leadership plays a key role

in determining translation priorities, ensuring that resources are allocated efficiently to meet the most urgent communication needs.

VI. Implementation Plan

The successful execution of the City's Language Access Policy relies on a clear framework for service delivery, accountability, and resource allocation. This section outlines key components of implementation.

1. **Roles and Responsibilities:**

    A. **Language Access Liaisons in Departments:**

        - Serve as the primary point of contact for language access efforts within each department.
        - Ensure compliance with the City's Language Access Policy.
        - Facilitate communication between department staff, the Language Access Coordinator, and contracted vendors.

    B. **Monthly Vendor Reports:**

        - Track interpretation and translation service usage across departments.
        - Identify trends in language needs to adjust resource allocation.
        - Ensure vendor performance aligns with contractual obligations and City standards.

    C. **Client Satisfaction Surveys**:
        - Gather feedback from LEP individuals about their experiences with language services.
        - Assess the effectiveness, accessibility, and responsiveness of interpretation and translation services.
        - Identify areas for improvement and adjust strategies accordingly.

    D. **Protocols for Service Delivery**
        - Ensure that frontline staff are trained on how to access interpretation and translation services promptly.
        - Establish standard operating procedures (SOPs) for requesting language services, including emergency protocols for urgent language needs.
        - Implement quality control measures, such as periodic language audits and mystery shopper evaluations, to assess the accuracy and effectiveness of services.

E. **Use of Technology in Language Access**
- Leverage remote interpretation platforms (telephonic, video, AI-City approved assisted) to expand access.
- Integrate translation management systems to streamline document translation and ensure consistency.
- Maintain multilingual digital resources, including translated forms, website content, and mobile-friendly service access points.
- Use real-time captioning and text-to-speech tools to improve accessibility for individuals who are Deaf or Hard of Hearing (D/HOH).

F. **Funding and Resources**
- Conduct budget evaluations to support the expansion of language access services.
- Identify grant opportunities and external funding sources to enhance language access initiatives.
- Ensure adequate staffing and contracting of professional language service providers to meet demand.
- Explore partnerships with community organizations and educational institutions to supplement resources, such as bilingual volunteer programs or interpreter training collaborations.

VII. Training and Capacity Building

To ensure compliance with the City of Richmond's Language Access Policy and to promote meaningful access to services for Limited English Proficient (LEP) individuals, the Language Access Coordinator will conduct the following mandatory training sessions for City staff. These trainings will equip employees with the necessary knowledge and skills to provide effective language assistance and uphold legal requirements related to language access.

Staff Training

- **New Hires:** As part of the new-hire orientation, all employees will receive training on, LAP objectives, policies, and tools for effective communication.
- **Annual Training:** Each department will provide annual language access training with the support of Language Access Liaisons and the Language Access Coordinator.

<u>The annual training will cover:</u>

- How to access language services, including interpretation and translation.
- Procedures for requesting translations of vital documents.
- Steps to request interpretation services and provide services in a non-English language.
- Best practices for delivering meaningful language assistance to LEP individuals.
- How to identify LEP and D/HOH individuals and determine their preferred communication methods.
- Techniques for working effectively with interpreters in person, over the phone, or via video remote platforms (Training will be provided in classroom setting until capabilities to be added to NeoGov).
-
- **Supplementary Training:** To address specific needs and skill gaps, additional specialized training sessions will be offered, including:

  - Working Effectively with Interpreters
  - The Role of a Cultural Broker
  - Cultural Competency in Service Delivery
  - Legal Requirements for Effective Communication with D/HOH Individuals
  - Best Practices for Working with Translators
  - Training for Qualified Multilingual Staff to enhance their ability to serve in a bilingual capacity.

Community Awareness

The City of Richmond will:

- Provide multilingual signage and informational materials in public offices.
- Conduct outreach in LEP communities through partnerships with community organizations.
- Maintain a webpage dedicated to language access services with information on available language assistance programs.
- Support community meetings and forums by providing Safe Harbor Languages to engage residents and ensure equitable access.

VIII. Proposed Civic Engagement and Language Equity Working Group

While the City of Richmond does not currently operate a formal Civic Engagement Commission, the principles of civic inclusion, equity, and community-driven participation are central to the City's Language Access efforts and public service delivery. The City recognizes that meaningful civic engagement builds public trust and ensures that

residents of all backgrounds especially those with Limited English Proficiency (LEP) can actively participate in the decision-making processes that shape their communities.

To further this vision, the City proposes the creation of a Civic Engagement and Language Equity Working Group as part of its broader commitment to equity and inclusion. This group would work in partnership with the Office of Immigrant and Refugee Engagement (OIRE), departmental language access liaisons, and community-based organizations to:

- Promote inclusive civic education and multilingual outreach efforts that reflect Richmond's diverse communities.
- Identify and reduce barriers to public participation, particularly for LEP residents and historically underrepresented groups.
- Provide recommendations to ensure communications, public meetings, and engagement processes are accessible, translated, and culturally responsive.
- Support civic initiatives such as participatory budgeting, community forums, and policy consultations by ensuring language equity is embedded in design and execution.
- Strengthen partnerships with grassroots and nonprofit organizations working to increase civic participation across all neighborhoods.

The City has already taken steps to lay the groundwork for this approach through:

- The provision of in-person, telephonic, and video interpretation services at community events and public hearings.
- Culturally responsive outreach campaigns coordinated through OIRE.
- Standardized interpreter training and bilingual staff fluency assessments.
- Digital and printed materials translated into Spanish, with additional languages available upon request based on community needs and event context.
- City staff training on inclusive communication and cultural competency.

The working group would further institutionalize these efforts and serve as a cross-sectoral advisory body that informs policies and strategies to enhance civic participation for all Richmond residents.

Integrating civic engagement into the City's Language Access framework reinforces Richmond's leadership in equity-focused governance and ensures that public participation is inclusive, accessible, and reflective of the communities the City serves.

IX. Language Access Complaints

The City of Richmond is committed to ensuring that all individuals have equitable access to services, regardless of language proficiency. Under Language Access Policy A.R. Number: 5.24, all City departments must provide effective communication to individuals

utilizing public services. If a person believes they have not received adequate language assistance or have been denied services due to Limited English Proficiency (LEP), they have the right to file a complaint.

Complaint Process

If a department fails to provide translated materials or interpreter services, individuals should:

1. Request to speak with a manager or contact the department's Language Access Liaison.
2. If the issue is not resolved, contact the Office of Immigrant and Refugee Engagement (OIRE) at 804-646-0145 for further assistance.
3. Complaints are directed to the Office of Immigrant and Refugee Engagement to review, address, and resolve complaints with the relevant departments.

A standardized complaint form is available for individuals and department staff to report issues related to language access services. This form can be submitted via:

- Hard copy (mailed to OIRE at 4100 Hull St Road, Richmond, VA 23224).
- Email. askOIRE@rva.gov
- Online via the RVA.GOV website.

Required Information for Complaints

To facilitate the resolution process, complaints should include:

- Complainant's name, contact information (mailing address, phone, or email).
- Description of the service or location where language access was denied or ineffective.
- Names of staff members or programs involved, along with the date and location of the incident.
- Explanation of how the lack of language access impacted service delivery.
- The desired resolution of the issue.
- Any supporting documents or relevant details.

Assistance in Filing a Complaint

Individuals who require assistance in completing the complaint form—whether due to language barriers or disabilities—may request support from City staff.

Monitoring & Accountability

- OIRE will review complaints, collaborate with the departments involved, and develop corrective action plans to prevent future issues.
- Language access concerns reported through liaison meetings and training sessions are addressed with vendors during monthly performance reviews.
- Complaint reporting templates are standardized and reviewed regularly (See Exhibit G).
- Notices about the complaint process are prominently displayed at public service locations and available online in the top spoken languages in Richmond.

Key Policies

- Complaints must be submitted as soon as possible. Late complaints will be reviewed to determine if further action is necessary.
- Complaints can be withdrawn at any stage, but OIRE retains the right to investigate and take corrective action as needed.

For more information or to file a complaint, visit RVA.GOV (we need to add the form to website).

XI. Monitoring, Evaluation, and Continuous Improvement

To ensure equitable access to City services for Limited English Proficient (LEP) individuals, the City of Richmond is committed to ongoing assessment and enhancement of its Language Access Plan (LAP). This section outlines the key metrics that help maintain high-quality language services, address gaps in service delivery, and support continuous improvement.

Metrics for Success

- Monthly Vendor Reports:
    - Monitors interpretation and translation service usage across departments. Assesses vendor performance, response times, and service accuracy. Identifies trends in language needs to adjust resource allocation.
- Regular Feedback Mechanisms
    - Report Service Gaps and Challenges, provision of effectiveness of interpretation and translation services.
- Client Satisfaction Surveys:
    - Collects feedback from LEP individuals and service providers. Evaluates ease of access, service quality, and areas for improvement. Guides enhancements in training, outreach, and vendor selection.
- Annual Review and Updates to the LAP
- Addressing Complaints and Resolving Issues

XII. Funding and Resources

Ensuring equitable language access services requires a sustainable funding strategy that prioritizes efficiency, resource allocation, and external support. The City of Richmond is committed to identifying and utilizing available resources to maintain and expand interpretation, translation, and accessibility services for Limited English Proficient (LEP) individuals.

- Budgeting for Language Access Services: City Departments incorporates language access funding into its annual budget to ensure consistent service delivery. Budget considerations include:

  - Interpretation and translation services (both in-person and remote).
  - Technology investments, such as video remote interpretation (VRI) and multilingual digital platforms.
  - Training and professional development for staff on language access protocols.
  - Community outreach efforts to inform LEP individuals of available language services.
  - Departments are encouraged to track language service usage and costs to support budget adjustments and funding requests.
- Grant Opportunities and Partnerships
- Efficient Use of Existing Resources
  - Centralized Language Services:
    - Maintain a centralized office of interpreters and translators and a repository of pre-approved translated documents.
    - Prevents duplication of expenses across departments and ensures equitable distribution of language services funding.
    - Ensures consistent messaging and equitable access for Limited English Proficient (LEP) individuals across all city services.
    - Guarantees compliance with federal (Title VI of the Civil Rights Act) and local language access policies to prevent disparities in service delivery.
  - Technology Integration: Utilize video remote interpretation (VRI), telephonic interpretation, and AI-assisted translation tools used by OIRE to enhance accessibility and efficiency.
  - Interdepartmental Collaboration: Encourage resource-sharing, joint training, and best practice exchanges among departments for a streamlined approach.
  - Community Partnerships & Bilingual Staff Utilization: Leverage local organizations, universities, and professionally assessed bilingual staff to supplement language services (not interpretation).

XIII. Appendices

- Glossary of Terms
- Sample Forms and Procedures (e.g., Complaint Form, Tagline, Toolkit/Guide)
- Contact Information for Language Access Resources

1. ACS- The American Community Survey (ACS) releases new data every year through a variety of data tables that you can access with different data tools.

2. ASL- American Sign Language (ASL) is a complete, natural language that has the same linguistic properties as spoken languages, with grammar that differs from English. ASL is expressed by movements of the hands and face. It is the primary language of many North Americans who are deaf and hard of hearing and is used by some hearing people as well.

3. Bilingual Assessment- A bilingual fluency assessment that assesses the candidate's oral proficiency in English and a target language, as we as knowledge of general terminology commonly used in the work setting.

4. Bilingual Employee-An individual who has the ability to use two languages. A bilingual person can learn to become a translator or an interpreter but is not automatically so qualified by virtue of his or her language abilities.

   a. For instance, a bilingual person may be fluent and well-suited to having direct monolingual conversations (e.g., Spanish to Spanish and English to English conversations) in more than one language but may not be skilled at converting those conversations from one language to another such as an interpreter.

5. Certified Deaf Interpreter (CDI). An individual who is deaf or hard of hearing (D/HOH) and has been certified by the Registry of Interpreters for the Deaf as an interpreter.

6. Certified Interpreter-A person who has passed the required language fluency examination in the certified languages.

7. Communication Access Real-Time Translation (CART). The instant translation of the spoken word into English text using a stenotype machine, notebook computer and real-time software. The text produced by the CART service can be displayed on an individual's computer monitor, projected onto a screen, combined with a video presentation to appear as captions, or otherwise made available using other transmission and display systems.

8. Consecutive Interpreting- Consecutive interpreting is the practice of delayed, oral translation. It generally involves a speaker saying a sentence or two, then a pause is usually needed while the interpreter translates what was said into another language.

9. Contractor -Any entity that performs work or provides services on behalf of an agency or division under a contractual agreement with reimbursement.

10. Cultural and Linguistic Competency -A set of behaviors, attributes, and policies enabling an agency (or individual) to function effectively and appropriately in diverse and cross-cultural interactions and settings. Creating culturally and linguistically competent materials requires considerations for individual, cultural and linguistic differences, and the use of appropriate language, messages and images that are relevant to the specific community or population.

11. Deaf/deaf (D/d). Uppercase Deaf denotes a particular group of people who are deaf and share a language and a culture; lowercase deaf refers to the audiological condition of not hearing. An individual who is deaf or hard of hearing (D/HOH) may also have limited proficiency in spoken or written English and may not be proficient in ASL or any other recognized sign language.

12. Deaf Interpreter. A specialist who provides cultural and linguistic expertise. A Deaf Interpreter provides interpreting, translation, and transliteration service in sign languages (or written language) and other visual and tactual communication forms used by individuals who are Deaf, Deaf-Blind, Deaf-Disabled, Hard of Hearing, or Late-Deafened.

13. Effective Communication. For communication disabilities, it refers to aids and services to ensure that communication with people with disabilities, such as people who are D/HOH, is as effective as communication as for people without disabilities

14. ELL- English language learners, or ELLs, are individuals who are not yet able to communicate fluently or learn effectively in English.

15. ESL- ESL is a common abbreviation used in schools and it stands for English as a Second Language.

16. Hard of hearing (HOH). Someone experiencing hearing loss ranging from mild to profound. An individual who is deaf or hard of hearing (D/HOH) may also have limited proficiency in spoken or written English and may not be proficient in ASL or any other recognized sign language.

17. Interpretation. The act of listening, understanding, analyzing, and processing a spoken communication in one language (source language) and then faithfully orally rendering it into another spoken language (target language) while

retaining the same meaning. For individuals who are D/HOH, this can include understanding, analyzing, and processing a spoken or signed communication in the source language and faithfully conveying that information into a spoken or signed target language while retaining the same meaning.

18. Interpreter- An individual who listens to a communication in one language and orally converts to another language while retaining the same meaning.

19. Limited English Proficient Persons-Individuals who may or may not have English as their primary language and who may feel more comfortable speaking or reading a document to someone in a language other than English.

20. Language Access -Achieved when individuals with LEP can communicate effectively with employees and contractors and participate in programs and activities.

21. Language Access Coordinator- provides critical oversight and coordination across City of Richmond to ensure that the city's language access policy, which was implemented in July 2023, is implemented efficiently and effectively. The Language Access Coordinator is a part of the Office of Immigrant and Refugee Engagement, which also supports The City of Richmond's language access policy by maintaining the State contract through which agencies are able to access vendors that provide interpretation and translation services.

22. Language Access Liaison- Serve as point person for their department in implementation and monitoring & evaluation of the of the City of Richmond language access plan and policy with the assistance of the Language Access Coordinator.

23. Language Access Provider- A language provider is an organization that provides interpretation and/or translation services to another organization, usually in return for a fee.

24. Language Assistance Services. Oral and written language services used to provide individuals with LEP and/or those who are D/HOH meaningful access to, and an equal opportunity to participate fully in, the services, activities, and other programs administered by the Department.

25. Meaningful Access. Language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP needing assistance. Meaningful access denotes access that is not significantly

restricted, delayed, or inferior as compared to programs or activities provided to English-proficient individuals.

26. Non-English Speaking- Non-English speaking is a term that refers to people who speak a language other than English as their native or primary language.

27. OIRE- Office of Immigrant and Refugee Engagement offers a clear point of access for community resources and a welcoming front door for immigrant newcomers moving into or residing in the city of Richmond.

28. Plain Language -Plain language as defined in the Plain Writing Act of 2010 is writing that is "clear, concise and well organized."

29. Preferred Language -The language that an LEP individual identifies as the language that he or she uses to communicate effectively and is the language that the individual prefers to use to communicate.

30. Relay Services- A relay service provides an operator who reads the text on a TTY and speaks the message into a telephone and/or listens on a telephone and types the message on a TTY.

31. Sight Translation – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document

32. Simultaneous Interpretation- Simultaneous interpretation (SI) is when an interpreter translates the message from the source language to the target language in real-time.

33. Translation-A translator conveys meaning from written text to written text. As a result, interpretation requires skills different from those needed for translation.

34. Translator -A person who has passed a recognized written translation examination offered by another organization (e.g., Department of Social and Health Services, American Translators Association, etc.). The person must understand the client's culture and be able to integrate that understanding into the translation of written material.

35. Taglines -Brief messages that may be included in or attached to a document. Taglines in languages other than English can be used on documents written in English that describe individuals with LEP can obtain translation of the document or an interpreter to read or explain the document.

36. TTY- (Teletype) acronym are used interchangeably to refer to any type of text-based telecommunications equipment used by a person who does not have enough functional hearing to understand speech, even with amplification. The person sending a message type it on a small keyboard, and the person receiving the message reads the text on the display. In order for a person to use a text telephone, the individual at the other end of the conversation must also have one, or they must use a relay service.

37. Vital document -A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or if CMS is required by law to provide the document. Vital documents include, but are not limited to applications for benefits, consent forms and complaint forms; notices of rights and notices of disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rulebooks; written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client. For example, if a complaint form is necessary in order to file a claim with an agency, that complaint form would be a vital document.

Appendix B. Top Languages Spoken by City of Richmond Limited English Proficient Population according to ACS and RPS data.

The City of Richmond	
Language	% Of LEP Population
1 Spanish	71.57
2 Arabic	6.53
3 Brazilian Portuguese	3.09
4 Vietnamese	2.70
5 French	2.57
6 Mandarin	2.50
7 Portuguese	2.47
8 Russian	1.75
9 Pashto	1.61
10 Hindi	1.50
11 Dari	1.43
12 Burmese	1.24
13 Korean	1.04

Percentages for each language based on a LEP population of 24,000

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Language Access Complaint Process

1

SUBMISSION OF COMPLAINT

This may be online, Over the phone, by mail, in person

2

LAC MEDIATES RESOLUTION

LAC receives complaint and generates timeline of resolution. (10 days)

3

INTERVIEW

LAC communicates with client within 48 hrs. and ask questions to obtain more clarity of the complaint.

4

INVESTIGATION

LAC works with City department to understand and address barriers or challenges.

City of Richmond, Departments must work with Language Access Coordinator to establish and implement corrective actions.

7

APPEAL

Client has 30 days to appeal resolution if not enough to suffice concern.

6

RESOLUTION

Present to client, discuss process of resolution either by mail, in-person, email

5

PRESENT TO OIRE MANAGER

Final decision of resolution to complaint.

Language Access Complaint Form

If a **City of Richmond** Department has been unable to assist you due to a language barrier or non-compliance with the **Language Access Policy Administrative Regulations (A.R. 5.24)**, additional support may be available to ensure you receive the services you need.

If you need a translated copy of this form, please email **(OIRE)** at **askOIRE@rva.gov** for assistance.

Once completed, please submit this form and any related documentation to:

Email: askOIRE@rva.gov

Mail: 4100 Hull Street Road

          Richmond, VA 23224

We attempt to resolve all concerns in a timely manner.

SECTION I. YOUR INFORMATION

	FIRST NAME	MIDDLE	LAST NAME
Name:			
Address:	STREET ADDRESS, CITY, STATE, ZIP CODE		
Phone Number:	AREA CODE + PHONE NUMBER	**Email Address:**	

SECTION II. COMPLAINT DETAILS

Date of Incident:	MM/DD/YYYY	**Location of Incident:**	STREET ADDRESS, CITY, STATE, ZIP CODE

PROVIDE THE NAME OF THE DEPARTMENT OR OFFICE THAT YOU CONTACTED:

Language Access Issues (Check all that apply)

- ☐ Lack of signs informing the public of translation services
- ☐ Lack of forms or other materials in multiple languages
- ☐ Lack of bilingual staff or interpreter provided to help the public
- ☐ Other: _____

What language did you need help with?

Provide a brief description (attach additional pages if needed):

Page 1 of 4

Appendix D. Language Access Toolkit/Guide

Appendix E. You Have the Right to free Language Services posters (Taglines)

(Are displayed in all our public-facing sites throughout The City of Richmond.)

Language Access Services
Servicios de acceso lingüístico

i SPEAK RICHMOND
City of Richmond's Language Access Service

"You have the right to ask for an interpreter and get help in your language for free, including American Sign Language (ASL). If your request is denied, call the City of Richmond, Office of Immigrant and Refugee Engagement at 804-646-0145 to file a complaint."

"Usted tiene el derecho de solicitar un intérprete y obtener ayuda en su idioma de manera gratuita inclusive Lenguaje Americano de Señas (ASL) . Si su solicitud es negada, llame la oficina de Enlace de Inmigrantes y Refugiados de la Ciudad De Richmond al 804-646-0145 para presentar una queja"

OIRE
OFFICE OF IMMIGRANT
AND REFUGEE ENGAGEMENT

Appendix F. How to Work with an Interpreter

Tips for Working with an Interpreter

Whether via video, over the phone, or in person, the OIRE team wants to help our employees get the most out of the medical interpreters who support your clients. So, we've compiled some tips that highlight some of the DOs and DON'Ts of working with language interpreters.

PLEASE DO...

- Greet the client first, then the interpreter.
- Allow time for an introduction and brief pre-session with the interpreter.
- Speak directly to the client, rather than say "tell her...".
- Pause often to allow the interpreter to interpret everything that is said.
- Allow one person to speak at a time.
- Plan and allow for more time when working with Limited English Proficient (LEP) or Deaf clients.
- Ask the patient to repeat back information or instructions to confirm understanding.
- Be culturally aware with things like eye contact, personal space, and touching.
- Ask the interpreter to point out potential cultural misunderstandings that may occur. And consider the interpreter's judgment that a question may be culturally inappropriate. Consider rephrasing the question or asking for the interpreter's help in eliciting the information in another manner.
- Know that the interpreter may take longer than the original speech. In some languages there may be no linguistic or conceptual equivalent of some words.
- Explain concepts, rather than relying on the interpreter to explain or answer questions. They are there to interpret only what is said and help explain cultural issues if necessary.

- Speak in:
  - Standard English (avoiding slang)
  - Layman's terms (avoiding jargon or abbreviation)
  - Straightforward sentence structure
  - Complete sentences and ideas
- When leaving the client area, request the interpreter leave with you. Or if using a video or phone interpreter, disconnect the call.

BUT PLEASE DO NOT...

- Ask a child to interpret.
- Make assumptions about the educational level of a client who is LEP or Deaf. The inability to speak English or hear does not necessarily mean a lack of education or intelligence.
- Write notes for Deaf or Hard of Hearing patients, as this is not the preferred form of communication. Instead, please request an ASL interpreter.
- Use family members and friends. This is highly discouraged, as they often do not know certain terminology. They may also edit the information, resulting in an inaccurate or incomplete interpretation.
- Say anything you do not want interpreted, as the interpreter's job is to interpret everything.
- Hold the interpreter responsible for what the patient says or doesn't say. The interpreter is the medium, not the source of the message.

Tips Specifically for Working with a Video Interpreter

- Adjust the camera so that the interpreter can see and hear the client well and the client can see the interpreter.
- Request an on-site interpreter if video is not an appropriate mode of providing language assistance for the client, in critical situations or call 866-998-0338 and provide account and PIN #.
- Consider visual issues for a Deaf client.
- Consider mental or cognitive issues.

- Be sensitive to complicated or emotional content in the conversation.
- It is extra important to speak slowly and pause often for accuracy.
- Be aware of background noise which could make the interpretation difficult.
- Don't leave the interpreter over video alone in the room with the client. Disconnect if you will be away.

Purpose: To equip City of Richmond departments and programs with a comprehensive understanding of their legal obligations, regulations, and policy directives concerning the provision of services to Linguistically Diverse (LD)/Limited English Proficient (LEP) members of the public."

Federal Requirements	Summary of requirement specific to language access	Website
Title VI of the Federal Civil Rights Act of 1964	Prohibits discrimination based on race, color, or national origin in federally funded programs; denying meaningful access to LEP individuals may constitute national origin discrimination	Link: United States Code Chapter 21- Civil Rights
Affordable Care Act Section 1557	Covered entities must inform the public about available language services by posting taglines in the top 15 languages spoken by LEP individuals in the state.	Link: Summary of the Section 1557 of the Affordable Care Act
The Stafford Act	Requires the Administrator of FEMA to lead efforts to prevent discrimination against LEP individuals in emergency management and assistance. (see §5196 Disaster related information services)	Link: United States Code Chapter 68 - Disaster Relief
Executive Order 12250	Requires that federal agencies coordinate their Title VI enforcement efforts under the guidance of the Federal Coordination and Compliance Section of the Department of Justice Civil Rights Division.	Link: Executive Order 12250
Section 504 of the Rehabilitation Act of 1973	Section 504 (29 U.S.C. § 794) requires federally funded programs to provide accommodations—such as interpreters, captioning, or assistive devices—to ensure effective communication for people with disabilities.	Link: Summary of Section 504, Rehabilitation Act of 1973
American with Disabilities Act of 1990	Title II of the ADA (42 U.S.C. §§ 12101–12213) requires state and local governments to provide equal access for people with disabilities, ensuring they can participate in and benefit from all programs and services.	Link: Americans with Disabilities Act Title II Regulations
City Requirements	Summary of requirement specific to language access	**Website**
Language Access Plan	A Language Access Plan outlines the City of Richmond's actions to ensure meaningful access, including translated documents, available languages, staff language skills, training, monitoring, and outreach strategies.	Link: Language Access | Richmond (rva.gov)

If you have additional questions, please contact:

Roxana Talavera Denson
Language Access Coordinator
City of Richmond, Office of Immigrant and Refugee Engagement
900 East Broad Street5th Floor
Richmond, Virginia 23219