



Michigan State University Extension Language Access Plan

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Section 1 – Organizational Mission, Values and Diversity, Equity and Inclusion Commitments

MSU Extension Mission

Michigan State University (MSU) Extension helps people improve their lives by bringing the vast knowledge resources of MSU directly to individuals, communities and businesses.

MSU Extension Shared Values

In October of 2018, MSU Extension adopted shared values that help define our social contract with each other and our partners.

We will show up. Whether in person or digitally, MSU Extension professionals will remain engaged by being a part of community conversations, directing appropriate programming and research for community needs and never forgetting who we serve.

We will help people thrive. We will create and maintain positive environments that allow everyone to do their best and be their best. We will work with our communities to highlight their assets while fostering partnerships to discover new possibilities together.

We will be authentic. We know that we cannot be all things to all people. But we will live our truth, do what we do best, and connect audiences to colleagues and partners when we can't personally meet their needs. We will do this all while staying rooted in evidence-based science.

We will welcome everyone. We will foster inclusivity across our organization, in our programming, through our community partnerships and in our hearts. We will nurture an environment that respects and values human differences as we continuously work to expand our reach to diverse audiences.

We will manage resources responsibly. We will be good fiscal stewards of the funds that are supplied to us from federal, state, local and university resources, as well as those that are garnered through community partnerships and philanthropy.

We will take risks. We are lifelong learners who look for innovative and new ideas that will help us better serve Michigan residents.

MSU Extension Diversity, Equity and Inclusion Dedication Statements

All MSU Extension professionals are dedicated to the following:

- We work together to ensure that programming is delivered to diverse audiences, produces equitable impacts for all participants and demonstrates partnership and inclusion for all groups.
- We embrace that it is everyone's job to create a culture that promotes diversity, equity, inclusion and belonging.
- We ensure that every team member is prepared with the skills and resources necessary to contribute to our welcoming and inclusive culture.
- We foster inclusion by recognizing and valuing diverse perspectives, skills and experiences, and work to create equal access to programming for all Michigan communities.
- We commit to continuous learning for diversity, equity and cultural competency to achieve inclusive excellence.
- We understand that diversity, equity and inclusion are vital to the organizational culture and programmatic success of MSU Extension.



- We embrace a culture of understanding, coaching and feedback towards achieving a vision of success for the entire organization.

Why Language Access is Important to Fulfill MSU Extension's Mission

Language is the primary way that we communicate our thoughts, ideas, feelings and other information as we interact with others. As an organization that is present in all 83 Michigan counties, we know there is a wide variety of English language access and understanding among residents. Our mission, civil rights mandates, shared values and DEI dedication statements ensure that language access is not a barrier for residents to fully participate in our programs and access our vast array of resources. Historically and currently, our staff members have been predominantly monolingual (English only) speakers. To authentically serve our communities, we must support staff to find resources and agencies to meet the needs of our limited-English population and community partners. We can do this by making an organizational commitment to hiring and retaining bilingual/bicultural staff to serve Michigan residents.

Language Access Policy

In accordance with our organizational mission, shared values and inclusion commitments, and the National Institute of Food and Agriculture (NIFA) accountability framework for language access, it is MSU Extension's policy to ensure that persons with limited English proficiency have meaningful access to our programs, services and activities. Our objective is to ensure that no person is discriminated based on their language, or any other marker associated with their national origin, ethnicity or identity.

Section 2 - Language Access, Limited-English Proficiency and Key Terms

Definition of Language Access

Extension and our federal partner (NIFA) defines language access as the strategic and systematic management of multilingual communication within different contexts and across various scales of delivery. Language access has two main implications for MSU Extension activities and programs. First, language access involves providing appropriate accommodations (e.g., translation and interpretation) to remove communication barriers. Second, language access refers to MSU Extension's collective effort to create programming, services and activities that are culturally responsive and linguistically appropriate for persons with limited English proficiency (LEP). The purpose of creating language access is to ensure equal or equitable access and full participation in programs and activities offered for LEP persons and audiences. Language access at a minimum can mean ensuring Extension materials are available in languages other than English, but access also includes our organization investing in staffing and program development for intentional multilingual outreach.

What is Limited English Proficiency (LEP)?

Limited English proficiency refers to persons who do not speak English as their primary language and/or who have a limited ability to read, write, speak or understand the English language.

Key Terms

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

Interpretation – The process by which the spoken word is used when transferring meaning between languages. Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text.



Limited English Proficient (LEP) - Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient. These individuals may be entitled language assistance with respect to a particular type or service, benefit or encounter.

Meaningful Access - (for LEP audiences) represents access to Extension programs, activities and services that are not substantially restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.

Reasonable Steps - refers to the intentional and appropriate measures and resources used by Extension to address access barriers to information and participation in educational programs. The federal government uses a four-factor analysis as a baseline to determine compliance with providing LEP persons meaningful access to an organization's activities and is contained in MSU Extension Language Access Plan.

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

Vital Document – Paper or electronic written materials that contains information that is critical for accessing a program or activity, or is required by law, such as consent forms, applications and notices of rights.

Section 3 - Language Access and Federal Laws and Policies

Language Access and Civil Rights

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color or national origin in federally supported activities (§ 601). According to the law, a person's language is considered to be an extension of their national origin. Under Title VI, individuals and communities are protected from being the targets of discrimination, which includes organizational practices in federally supported activities that have a disparate impact on groups that speak different languages, see *Lau v. Nichols*, 414 U.S. 563 (1974).

As a recipient of federal funding and other resources, MSU Extension must adhere to language access compliance responsibilities established by Title VI and the corresponding legal framework apply to the entire organization and staff acting on its behalf.

Federal Standards for Serving LEP Individuals/Communities

There are federal laws, policies and regulations that govern and inform MSU Extension's compliance responsibilities including:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 (2000)
- Memoranda to Federal Department Heads from Attorney General (2010, 2011)
- Food and Drug Act (2008)
- The U.S. Department of Agriculture's (USDA) Final Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency (2014)
- The National Institute of Food and Agriculture's (NIFA) Limited English Proficiency (LEP) Implementing Strategy for Federally Assisted Programs (2016)

Four-factor Analysis – Identification and Assessment of LEP Communities

The following four factors provide a flexible, fact-dependent standard for determining how institutions should consider responding to their language access needs. The four-factor analysis includes the:

- Number or portion of LEP persons in target or eligible population
- Frequency of contact the organization's programs have with LEP audiences
- Nature and importance of the program or activity



- Organizational resources available to implement language access services

Section 4 – Language Access Resources

Public Notice

NIFA recipients must assure LEP persons are notified of LEP services offered by the recipient of federal funds. These services must be offered free of charge. Additionally, MSU Extension’s Event Management system provides program participants with the opportunity to request accommodations for any program they attend.

Certified Languages International (CLI) Instruction Services Card

The MSU College of Agriculture and Natural Resources has contracted with Certified Languages International to support staff, both on campus and statewide, to provide information or services to individuals whose first language may not be English. Certified Languages International employs certified interpreters in over 230 languages, operating 24/7, year-round. To use the over the phone interpreting services, please follow the instructions below:

Certified Languages International Over the Phone Interpreting Services

1. Dial 1-800-225-5254
2. When the operator answers, tell them:
 - a. The MSU customer code – 905569
 - b. Share with them that you are calling from Michigan State University College of Agriculture and Natural Resources – MSU Extension
 - c. Share the language you need (if you are uncertain, the operator can assist you)
 - d. Inform the operator if you need a third-party dial-out
3. The operator will connect you with an interpreter promptly

Recommendations for Using an Over-the-Phone Interpreter

- If you need to reach an individual at home or need a third-party dial-out, inform the operator before the interpreter is connected.
- Once the interpreter is connected, you can then share the name of the individual needing services with the interpreter
- At this time, you can also tell the interpreter how to proceed if the call goes to voicemail and what message to leave, if desired

For Inbound Calls:

- Explain to the individual that all information shared on the call and through the interpreter is confidential and encourage them to share any questions
- Speak clearly
- Smile and be kind to help the individual feel comfortable
- If face-to-face and multiple people are in the room, speak to one individual at a time
- Encourage the individual to speak freely; all interpreters are sworn to confidentiality, neutrality, and the Interpreter Code of Professional Ethics

Certified Languages International (CLI) instruction information is also included in each District’s Civil Rights Archive files and on the MSU Organizational Development website [here](#). Please note: Over the phone



interpreter services are intended for short term interactions. For example, if a person comes into a local office asking for information about Extension, an Extension related program or other general information.

Translation of Materials

A separate budget is available through the MSU Extension diversity, equity and inclusion (DEI) specialist. These services include providing over the phone translation services through Certified Languages International (CLI), translation of materials and face to face or virtual interpreter services. If you are interested in exploring having program or other materials translated for your use in providing services to Limited English Proficient audiences, please follow the instructions below:

- Contact the DEI specialist at 517-432-2666 or by email if you have questions or to brainstorm about the use of translation services.
- Submit materials, preferably in Microsoft Word, and advise the specialist about what language translation is need, preferred timeline, etc.
- Translation request will be submitted for a quote (response within two days).
- You will receive a copy of the quote and a response on plans to proceed including a timeline for completion within 10 days of submission.
- Please note: If you or your work team receives \$1,000 or more in translation support from this budget in a fiscal year (July 1 to June 30), you will be expected to contribute a “cost share” of 30% for every request after the initial \$1,000. These funds are not exhaustive and are for use across the organization. The “cost share” is intended to help these budgeted funds to service as many LEP audiences as possible.
- The coordination of translation services takes time – up to 30 days total (quote and translation of materials) so please plan accordingly, in addition to checking your events regularly for translation/interpreter or other LEP requests for accommodations.

Michigan State University Extension has contracted with the Hispanic Center of Western Michigan (<https://hispanic-center.org/>) and 7Clingo (<https://7clingo.com/>) for use in the translation of materials. Both organizations have certified translators for various languages.

Questions to Consider when Requesting Translation of Materials

1. Who has requested the translation of these materials or a language interpreter? A community partner, an agency or an individual? You or your work team members? Others?
2. If you or others have made the decision to translate these materials or seek a language interpreter, how have you come to this decision?
3. What is the overall goal associated with the translation of these materials or use of a language interpreter?
4. What is the current format of the material that needs to be translated? PDF, Word doc, other?
5. How long is the material that needs translation? One page? Longer?
6. How long will you need a language interpreter? One program? Longer?
7. Is the material to be translated a curriculum to be taught by others?
8. Who is the intended audience for these translated materials or language interpreter?
9. Does MSU Extension own the content or does it belong to other authors/individuals? If it's the latter, do you have written permission from the original author to translate these materials?

These and other questions that arise during this process should not be seen as barriers, but rather as helpful information that can ensure you authentically meet the needs of LEP individuals or audiences.



Use of Language Interpreters for Face-to-Face or Virtual Programs

Similar to the translation of program or other materials, MSU Extension allocates funds to contract with language interpreters for face-to-face or virtual programs. Many of these needs are specific to the program or intended audience, so we encourage you to contact the DEI specialist at 517-432-2666 or by email to explore available resources and services.

MSU Extension has contracted with the Hispanic Center of Western Michigan (<https://hispanic-center.org/>) and 7CLingo (<https://7clingo.com/>) for use in providing language interpreters for face to face or virtual programs. Both organizations have certified interpreters and translators on staff.

MSU Extension Supporting Refugee Communities

The MSU Extension Health and Nutrition Institute (HNI) is working to meet the needs of Refugee communities when they are re-settled across the state. Many refugee communities are eligible to receive services through MSU Extension. Our goal is to engage these individuals and communities so they can fully participate in our programs. MSU Extension has dedicated programming [staff](#), many who are bilingual and bicultural, who offer programs to these communities or can assist colleagues and other partners in meeting the needs of refugee communities. For many of these communities, language access can be a barrier to needed resources and services. To learn more about MSU Extension's work and resources to meet the needs of Refugee communities in Michigan visit their website [here](#).

LEP Website

This United States government website provides resources and other related information to assist with Limited English Proficient individuals and communities. You can access the website [here](#).

Section 5 – Filing a Civil Rights Complaint

Individuals who feel that they have been denied access or participation in Extension programs or services may file a civil rights complaint, documenting the incident. Civil Rights complaints can be filed in two different ways, through MSU Extension or USDA. Civil Rights complaints, using either option, must be filled in writing within 180 days of the incident.

Filing a Complaint through MSU Extension

- Send an email to msuedir@msu.edu documenting the incident in question. Include the date of the incident, description of the incident, names of individuals involved and any other information you deem relevant. Include "Civil Rights Complaint" in the subject line.
- Submit complaint within 180 days of the incident.

Filing a Complaint through U.S. Department of Agriculture (USDA)

To file a program discrimination complaint, complete a Form AD-3027, USDA Program Discrimination Complaint Form, which can be obtained online, at <https://www.usda.gov/sites/default/files/documents/usda-program-discrimination-complaint-form.pdf> or from any USDA office by calling (866) 632-9992 or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by mail to:

U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights



1400 Independence Avenue, SW
Washington, D.C. 20250-9410
Or fax: (833) 256-1665 or (202) 690-7442
Or email: program.intake@usda.gov

This document has been informed by the National Institute of Food and Agriculture's, "Limited English Proficiency Implementing Strategy for Federally Assisted Programs" (2016) which can be accessed [here](#). This document has also been informed by the Language Access Plan – University of Wisconsin Extension – Cooperative Extension (2018) which can be found [here](#).

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