

Language Access Plan (LAP) for Oklahoma Center for the Advancement of Science and Technology (OCAST)

Introduction and Purpose

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”, Oklahoma Center for the Advancement of Science and Technology (OCAST) has established the following Language Access Plan (LAP) to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our agencies. An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.”¹

The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across beneficiaries. This is essential to our mission to foster innovation in existing and developing businesses.

Persons Charged with Implementing the Plan

The OCAST Compliance Officer, Joyce Coleman, will be responsible for overseeing the implementation of this plan. In addition to the Compliance Officer oversight duties, Ms. Coleman will be charged with maintaining and updating this plan as the need for changes arises. Ms. Coleman will report to the Executive Director and will need to coordinate with the Programs and Data Analytics teams in order to carry out the directives established by this plan.

To prepare for the development of this plan, we conducted a Four-Factor Analysis which balanced the following factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population
2. The frequency with which the LEP persons come into contact with the agency
3. The nature and importance of the program, activity, or service provided by the agency
4. The resources available and costs to OCAST for this service

Identification and Assessment of LEP Population

In order to identify LEP individuals in Oklahoma, we consulted data from the American Community Survey website.² Based on this data, we have identified LEP populations in the state of Oklahoma to be persons who speak Spanish (7.8% of population), Other Indo-European (0.9% of population), Asian and Pacific Islander (1.6% of population) and Other (0.7% of population).

¹ [Executive Order 13166](#)

² [2022 Languages Spoken at Home](#)

As Oklahoma evolves over time, we will continue to monitor shifts in our population's demographics through annual assessments to ensure that we are adequately tracking LEP representation in our jurisdiction. We will also work to identify LEP individuals in our normal encounters with the public by:

- Assuming LEP if communication seems impaired;
- Responding to individual requests for language assistance services;
- Relying on self-identification by the non-English speaker or LEP individual;
- Asking open-ended questions to determine language proficiency;
- Using "[I Speak](#)" language identification cards or posters;
- Collecting and recording primary language data from individuals when they first engage with our programs and services.

Language Assistance Services

It is our understanding that these LEP individuals may interact with our staff in a number of ways:

- Participation in competitive programs;
- Outreach programs;
- Information line calls;
- Public meetings and hearings;
- Public access to agency websites;
- Written materials or complaints;
- Agency brochures.

Due to the variety of encounters that LEP individuals may have with the OCAST SSBCI programs, a variety of language assistance services will be provided and advertised to these individuals. To determine the extent of language assistance services provided, we relied on our Four-Factor Analysis and identified the following groups as meeting the 1,000 or 5% LEP threshold for the provision of language assistance services – see [Figure 1 State of Oklahoma LEP Characteristics for populations 1000+](#) (U.S. Census Bureau, "Language Spoken at Home for the Population 5 Years and Over," American Community Survey, ACS 1-Year Estimates Detailed Tables, Table C16001, 2022):

- Spanish (109,797, 72.61% of LEP population)
- Vietnamese (10,595, 7.01% of LEP population)
- Other Asian and Pacific Island (10,112, 6.69% of LEP population)

For these LEP populations, both oral and written language assistance services will be provided.

Oral Language Assistance

Oral language assistance may be necessitated by encounters with LEP individuals either over the phone, in person, or at public hearings. When one of these encounters occurs, staff members will carry out the following protocol:

For communication over the phone:

The staff member will first make an effort to identify the primary language of the individual. If that staff

member is approved as bilingual in the individual's primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will transfer the call to another staff member who has been approved as bilingual, as listed in the Staff Directory. If no bilingual staff member is available to assist the individual, then a Google translate, that translates over 100 different languages, approved volunteer from the community or interpreter for hire may be used to communicate with the LEP individual.

For communication in person:

The staff member will first make an effort to identify the primary language of the individual, using an "I Speak" language card if necessary. If that staff member is approved as bilingual in the individual's primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will contact another staff member who has been approved as bilingual, as listed in the Staff Directory, to come and assist the individual. If no bilingual staff member is available to assist the individual, then Google translate, that translates the website into over 100 different languages including all of the languages which fall under the DOJ Safe Harbor³ Provision may be used to communicate with the LEP individual.

For public hearings:

In all public notices of hearings, we will announce in the languages previously identified that an approved interpreter will be provided at the hearing upon advance request. A phone number will be provided in the notice for LEP individuals to call and request the interpreter.

Written Language Assistance

Written language assistance may be necessitated for a number of documents, notices, advertisements, forms, etc. "Vital documents" will be translated proactively and made accessible to the LEP communities previously identified. Documents will be classified as "vital" by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences associated with the document, and organizational resources. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Documents not considered vital will be available for oral or written translation upon request. Translated documents will also be accompanied with the following disclaimer:

"We are providing the translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, and controlling document. This translated document is not an official document."

In addition to vital documents, all notices of public hearings will include a section with key information (date, time, location, and subject matter) translated into the primary languages of the LEP communities previously identified. The OCAST website offers users the ability to change the preferred language for viewing the website.

Guidelines for Interpreters and Translators

While no formal certification is required for interpreters, translators, or staff members listed in the Staff Directory as bilingual, individuals providing interpretation or translation services must:

³ Department of Justice, 67 Fed. Reg. 2674 (Jan 18, 2002).

- Be proficient in and able to communicate information accurately in both English and the other applicable language;
- Understand agency-specific terminology;
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator;
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

LEP individuals may bring another individual to provide interpretation who has not been approved for formal interpretation services by the agency. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided;
- Use a formal interpreter instead of the informal interpreter, especially if the subject matter of the encounter may be prone to conflicts of interest;
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need.

When working with an interpreter, formal or informal, agency staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed;
- Briefly explain to the interpreter technical terms that may come up during the communication;
- Avoid the use of acronyms, double negatives, and contractions;
- Speak in short sentences that contain one idea at a time;
- Talk to the applicant and not to the interpreter;
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.

Providing Notice of Language Assistance Services

To ensure that members of LEP communities are aware of the free language assistance services provided to them, the following marketing and outreach steps will be taken:

- Place translated materials in conspicuous locations describing different services;
- Update non-English content on the agency/program website;
- Publish notices in non-English media about programs and services offered;
- Provide notification of services with all written materials.

Training Staff on LEP Policies and Services

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

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

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

Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the designated OCAST staff person will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, this person will make use of the following mechanisms:

- Survey staff on how often language assistance services are used and how they could be improved;
- Conduct customer satisfaction surveys of LEP individuals;
- Observe and evaluate agency interactions with LEP individuals;
- Solicit feedback from SSBCI Providers and other stakeholders;
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- Monitor the agency's response rate to suggestions or requests by LEP individuals;

Adopted and effective the 08/07/2024 ~~day of~~ _____, 20__:

Jennifer McGrail

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Executive Director

Oklahoma Center for the Advancement of Science and Technology

Figure 1 State of Oklahoma LEP Characteristics for populations 1000+

	Number	% of Total	Language % of LEP
Total Population:	3,779,627		
Speak only English	3,365,023	89.03%	
Spanish	293,264		
Speak English "very well"	183,467		
Speak English less than "very well"	109,797	2.90%	72.61%
French, Haitian, or Cajun:	3,890		
Speak English "very well"	2,949		
Speak English less than "very well"	941	0.02%	0.62%
German or other West Germanic languages:	8,631		
Speak English "very well"	7,680		
Speak English less than "very well"	951	0.03%	0.63%
Russian, Polish, or other Slavic languages:	3,564		
Speak English "very well"	2,835		
Speak English less than "very well"	729	0.02%	0.48%
Other Indo-European languages:	17,851		
Speak English "very well"	11,998		
Speak English less than "very well"	5,853	0.15%	3.87%
Korean:	3,083		
Speak English "very well"	1,818		
Speak English less than "very well"	1,265	0.03%	0.84%
Chinese (incl. Mandarin, Cantonese):	11,495		
Speak English "very well"	6,873		
Speak English less than "very well"	4,622	0.12%	3.06%
Vietnamese:	15,549		
Speak English "very well"	4,954		
Speak English less than "very well"	10,595	0.28%	7.01%
Tagalog (incl. Filipino):	4,353		
Speak English "very well"	2,944		
Speak English less than "very well"	1,409	0.04%	0.93%
Other Asian and Pacific Island languages:	25,679		
Speak English "very well"	15,567		
Speak English less than "very well"	10,112	0.27%	6.69%
Arabic:	6,557		
Speak English "very well"	4,840		
Speak English less than "very well"	1,717	0.05%	1.14%
Other and unspecified languages:	20,688		
Speak English "very well"	17,474		
Speak English less than "very well"	3,214	0.09%	2.13%
Speaks English Only or Speaks English "very well"	3,628,422	96.00%	
Speaks other Languages and English less than "Very Well"	151,205	4.00%	





2. OCAST LAP 2024

Final Audit Report

2024-08-07

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