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DEPARTMENT OF PARKS AND RECREATION

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LIMITED ENGLISH PROFICIENCY PLAN

PURPOSE: The purpose of this LEP Plan is to take reasonable steps to ensure persons with limited English proficiency are able to gain meaningful and understandable access to P&R services and programs.

BACKGROUND: Title VI of the Civil Rights Act of 1964 is the basis of Presidential Executive Order 13166. Title VI provides that "no person shall be excluded from participation in, or denied the benefits of, or be subjected to discrimination under any program receiving Federal financial assistance" because of their race, color or national origin. The interpretation of that statement is that a person's national origin may determine the language they speak and, therefore, their proficiency in English. Language barriers can serve to limit our multicultural residents from being able to fully take part in their community activities and could hinder their attempts to become self-sufficient and productive participants.

DEPARTMENT OVERVIEW OF SERVICES AND PROGRAMS VIA DIVISIONS AND SECTIONS:

- Administration provides organizational support services to all divisions and sections that assist in meeting the strategic goals and objectives of the department's mission. That support consists of Park Planning and Contract Management, Accounting, Payroll, Personnel and scheduling of pavilions and camping.
- Two County Bands provide musical services during scheduled concerts, parades, ceremonies, festivals and special events.
- Cemeteries provide affordable public burials as well as veterans cemeteries for the burials of Big Island Armed Forces veterans and eligible family members.
- Parks Maintenance, the largest division, provides maintenance for all park spaces and recreational facilities including offices. The division also undertakes construction, repairs and renovations of buildings and equipment. A plant nursery provides support for landscaping and beautification. A storeroom provides supplies for the entire department.
- The Recreation Division plans, conducts, arranges or promotes organized recreation, athletics, crafts, events and other leisure time activities for all age

groups at gyms and community centers throughout the island. The Division also conducts Summer Fun and Intersession programs at various sites in all districts.

- Ho'olulu Complex Section assures the clean, safe and efficient use of all facilities within the Ho'olulu Complex.
- Aquatics develops and initiates water safety operations and swimming programs at 9 County pool facilities island wide.
- The Culture and Community Arts Section promotes, perpetuates and encourages programs and activities in support of culture, art, history and the humanities.
- Panaewa Recreational Complex is comprised of the Panaewa Rainforest Zoo and Gardens and the Panaewa Equestrian Center.
- Hilo Municipal Golf Course provides the maintenance and starters office at the only municipal golf course on the island of Hawai'i.
- Elderly Activities Division is responsible for 6 programs which provide services for Older Americans on the Big Island.
 1. Coordinated Services promotes self sufficiency by providing in referral to services, in-home care, transportation and socialization to maintain independent living.
 2. Retired and Senior Volunteer Program makes opportunities for approximately 1,800 seniors to share their experience, abilities and skills with government and non-profit agencies as volunteers.
 3. The Nutrition Program provides 156,000 meals annually for seniors both in congregate settings and via Meals on Wheels.
 4. Senior Employment helps unemployed low income seniors foster economic self sufficiency through job training opportunities.
 5. Elderly Recreation oversees educational, recreational and athletic activities for seniors through various classes, programs and leagues in each community.
 6. Special Activities supports the Kupuna Hula Festival, Island wide tournaments and other events which extend competition beyond those offered in communities.

DEFINITIONS: For the purposes of this Plan, the following definitions will apply:

LANGUAGE ACCESS COORDINATOR – shall be the Director or someone else so designated by the Director.

LEP – Limited English Proficiency (LEP) shall describe persons whose primary language is not English and who have a limited ability to read, write, speak or understand English. Such persons may be eligible to receive language assistance during their interaction with P&R employees relating to a program, facility use or reservations.

VITAL DOCUMENT – shall be one that is necessary for the complete and total understanding of the LEP client that cannot be explained verbally, either in person or by phone. Such a document would provide important information necessary to participate in programs and activities offered by the department, including applications, outreach materials and written notices of rights, denial of services, etc. Such documents include burial information for cemeteries. Others will be described as they become known.

GUIDELINES: P&R will determine how to provide effective language access by considering the four factors of the Reasonableness Test which are: 1) the number of LEP contacts compared to the eligible population, 2) frequency of contacts by LEP persons with P&R employees, 3) the nature and importance of the services provided and 4) the resources and costs associated providing interpretation and translation services.

By far the greatest contact with the public in P&R offices is for facility use permits for gyms, community centers and pavilions. Other contacts ask questions about P&R programs for youth and elderly at pools, gyms, community centers and senior centers. Still other contacts are with seniors who are part of RSVP; volunteers at State and County offices and Non-profit agencies. Contacts may also involve burials at three Veterans cemeteries and several community cemeteries on the island.

PROCEDURES: P&R staff shall provide oral interpretation by first showing the card or signage to help LEP customers identify the language they need. Multilingual personnel shall be used, if available. The telephone 800 number shall be used where no other help is available. P&R will keep a list of employees within the County who are able to speak other languages and will use that source as they are able.

P&R will provide written translations of vital documents for LEP groups who constitute 5% or 1,000 persons, whichever is less, subject to the four factor test. The Language Access Coordinator will arrange for a written translation into an appropriate language within 10 business days after a request is made.

RESPONSIBILITY FOR LANGUAGE ACCESS PLAN: The Director has been designated the Language Access Coordinator (LAC) for the Department of Parks and Recreation. The LAC is responsible for implementing the Language Access Plan; conducting the initial survey and subsequent surveys to monitor changes in the LEP population it serves; producing internal documents that outline the policy and procedures of the plan; identifying the need for training, following through to provide training as required; reviewing, modifying the LAP as needed; and filing the LAP with the Office of Language Access.

DATA COLLECTION – INTERPRETER REQUIREMENT: To determine what communication barriers LEP persons may encounter, P&R conducted a survey of its employees to assess the frequency with which LEP persons have attempted to access our services and programs.

To determine whether to provide language access, P&R considered the totality of the circumstances as directed by the Office of Language Access using the following four-factor analysis:

- The number or proportion of Limited English Proficient speakers:
 - 460 employees surveyed.

- One, in the Retired & Senior Volunteer Program had contact with LEP clients several times a month. She speaks Ilocano and Tagalog with them because they feel most comfortable speaking in their home language. They are capable of conversing in Pidgin English but prefer these two Filipino dialects.
- Another encounter was with a German speaker at the counter of the Admin Office.
- Frequency of LEP contact with the Department of Parks and Recreation employees:
 - 98% of staff members never had contact with LEP clients.
- Nature and importance of services provided:
 - Access to facilities is one aspect of P&R's public contact. Campers from foreign countries reserve camp sites in the Administration Office. Most campers speak English well enough to understand what they need to do. When that is not the case, the placard with phone numbers for translations is available at the desk.
 - Access to programs is important as it ensures all people, visitors or residents, will be able to participate in what P&R has to offer.
- Resources available to the P&R Department and the costs of providing interpretation and translation services:
 - Hawai'i County has a contract with the Language Line to provide telephone interpreting services. Since the frequency with which LEP persons have contact with departmental employees is so little, the cost of providing this service when needed is not prohibitive.
 - Several employees within the department speak a few foreign languages and can be called upon to assist LEP clients when they are available.

RESOURCES: The County Human Resources Department has an established practice of asking new employees for their language skills. New employees of Parks and Recreation are not required to respond, but if they do report additional foreign language skills, their information is sent to the Human Resources Department. P&R has 11 employees with foreign language skills. A Report on Bilingual Employees is kept on a database in the Human Resources Department and updated annually. There are currently 148 employees within the County who speak one or more languages other than English and have volunteered to be of assistance if the need arises. If an interpreter is needed during the course of business to attend to a matter that is not thought to be particularly important to a person's life, the Bilingual Employees Report will be consulted to see if there is an available employee who can interpret. If a bilingual employee is not readily

available, or if the need for interpretation relates to an activity that is important to the person's life, P&R will use the Language Line, a telephone interpreting service which offers interpreting services in over 140 languages. If a face-to-face interpreter is needed, P&R will use the list provided by the Human Resources.

PROCEDURE: Posters which state "Interpretation Services Available" (from the Language Line) and "If You Need an Interpreter" (from the state Office of Language Access) are on display for public viewing in the P&R department.

Based upon a P&R survey, at this time, a written notice of the right to receive free oral interpretation of written materials, in their own language, shall be provided to LEP groups who meet the 5% threshold but number less than 50.

REPORTING SYSTEM: Two forms are utilized. One is for division heads to document the LEP contacts, noting the documents shared with the public, and staff encounters with persons who are LEP. The other form is the LEP questionnaire which is to be used by employees to document their experiences with persons who are LEP, which are turned in to their supervisors for submittal to the Language Access Contact. Both of these forms are attached and posted on the department's shared folder on P&R COH 02 in the Forms folder in Templates.

HIRING OF BILINGUAL STAFF: Pursuant to HRS §371-33(d), if P&R requires additional personnel to provide language access to LEP customers as directed by the guidelines in HRS §371-33(A) –(4), P&R will consider hiring qualified employees who are bilingual to fill vacant, existing, budgeted positions which serve the public.

TRAINING: The Language Access Contact is responsible for the development of materials and guidelines for training. These documents have been provided to division heads. At the time of hire, new employees will be made aware of our Language Access Plan and procedures.

EVALUATION: The Plan should be reviewed annually in September to ascertain its continual applicability. Adjustments should be made to the Plan as necessary, based on comments from LEP individuals, other interested individuals and P&R staff.