



CITY OF SUGAR LAND

# LANGUAGE ACCESS PLAN

Hello

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Hola

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# Record of Changes

Date	Changes Made	Author
11/2025	Initial version	LAP Committee

## 1. The City's Language Access Plan: What It Is and Why It Matters

The City of Sugar Land's Language Access Plan (LAP) is a high-level framework that outlines the City's commitment to ensuring that all community members, including those who do not speak English, have Limited English Proficiency (LEP), are deaf or hard of hearing (D/HOH), or face other communication barriers, have meaningful access to City services, programs, and activities. While the LAP sets the vision and expectations, detailed procedures and tools to support consistent, high-quality language access will be made available through the Language Access Center on the City's Employee Engagement Platform.

Language access reflects the City's pioneering spirit as a Trailblazer and embodies the values that guide Sugar Land employees every day: being **Bold, Loyal, Adaptable, Zealous, and Empowered** (BLAZE). These values drive a culture of service that encourages employees to take initiative, embrace diversity, and actively work to remove barriers that prevent meaningful language access for all.

That commitment is especially meaningful in Sugar Land, one of the most diverse cities in the nation, home to residents who speak dozens of languages and bring a rich mix of cultural traditions, perspectives, and experiences. This diversity is a defining strength of our community, shaping how we live, work, and connect with one another. The LAP builds on that strength by ensuring equitable opportunities for everyone to access information, participate in civic life, and engage with the City. By embracing our linguistic and cultural diversity, we not only remove barriers to service but build a more inclusive Sugar Land.

In addition to reflecting the City's commitment to excellence, language access is also grounded in legal obligations that ensure fairness and equity. Under Title VI of the Civil Rights Act of 1964, discrimination based on national origin, including language barriers, is prohibited in any program, service, or activity receiving federal financial assistance. As a result, the City is legally required to take reasonable steps to ensure that individuals with LEP and other communication needs have meaningful access to City services, programs, and activities.

The Language Access Plan strengthens representative government by ensuring all residents of Sugar Land can communicate with and be heard by their elected officials. Meaningful language access allows our leaders to understand the diverse needs, priorities, and perspectives of the community, which is essential when making decisions that shape the City's future. By reducing language barriers, the LAP helps create a decision-making process that reflects the voices of the entire community.

At its core, language access is about more than compliance; it is a demonstration of the City's commitment to building trust, strengthening relationships, and creating a place where everyone belongs. In Sugar Land's culturally and linguistically diverse environment, removing communication barriers ensures that everyone can stay informed, participate fully, and benefit from all that the City has to offer. The LAP also supports the City's broader goal of cultivating a more connected and engaged Sugar Land. By advancing language access, Sugar Land strengthens its foundation as an inclusive, trailblazing city where every voice matters.

## 2. Commitment Statement

The City of Sugar Land is strongly committed to making City services and information about those services available to everyone, regardless of language barriers. This commitment stems from the City's strategic outcome, "Government: Respected & Influential," and the City's All-in Initiative, "Encouraging Community Engagement."

Under Title VI of the Civil Rights Act of 1964 and other applicable federal and state laws, the City will take reasonable steps to provide language assistance services to individuals with limited English proficiency (LEP) and other communication needs, to ensure that they can participate fully and equally in our services, programs, and activities.

The City of Sugar Land will provide language assistance for City services, programs, and activities free of charge, including oral interpretation and written translation of vital documents, when requested. All city employees are responsible for understanding and adhering to this policy and for ensuring that individuals with limited English proficiency (LEP) and other communication needs are aware of the availability of language assistance services. This commitment statement will be reviewed annually to ensure its continued effectiveness and compliance with evolving legal requirements and community needs. Questions regarding this plan should be directed to the Department of Customer Experience ([language@sugarlandtx.gov](mailto:language@sugarlandtx.gov)).

## 3. Purpose

The City of Sugar Land's Language Access Plan (LAP) serves as a guiding framework to providing meaningful access to services, programs, and activities for individuals with limited English proficiency (LEP) and other communication needs. It establishes the City's responsibilities, and expectations related to language access.

This document is not intended to provide step-by-step instructions. Procedures, including how to request interpretation, access translated materials, or use available tools, are outlined in the **Language Access Standard Operating Procedure (SOP)**, which can be found in the **Language Access Center** on the City's employee engagement platform.

### a) Mission Statement:

To ensure equitable access to City of Sugar Land's services, programs, and activities for all individuals, regardless of English language proficiency (limited English Proficiency (LEP), deaf or hard of hearing (D/HOH), or other communication challenges). The City is committed to providing meaningful, timely, and effective language assistance services that empower individuals to participate fully and equally in the community.

### b) Vision Statement:

To create a community where language is not a barrier to accessing essential programs, services, activities, opportunities, and all aspects of civic life - fostering an inclusive environment where all individuals feel valued, respected, and empowered to engage with the City.

#### 4. Authority

The City of Sugar Land's commitment to language access is rooted not only in our BLAZE values, Strategic Outcomes, and All-In Initiatives, but also in clear federal requirements that safeguard equity and inclusion. Several key laws and regulations establish the City's legal obligation to ensure meaningful access for individuals with limited English proficiency and other communication needs. These authorities, which span civil rights protections and disability access requirements, provide the framework that guides the development and implementation of the LAP. Together, they ensure that all members of our community can fully participate in, benefit from, and engage with City programs, services, and activities.

##### c) Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in any program or activity that receives federal funds or other federal financial assistance. Title VI's prohibition on national origin discrimination has been interpreted to include a failure to provide language access. Title VI requires entities that receive federal funds to provide language access to persons who, as a result of national origin, are limited in their English proficiency and must develop language-access plans consistent with guidance that the Department of Justice had developed for federal funding recipients subject to Title VI and its regulations.

##### d) Title II

Title II of The Americans with Disabilities Act (ADA) relates to nondiscrimination on the basis of disability and requires state and local governments to provide equally effective communication for individuals with disabilities. The state or local government is required to provide aids or services, like a sign language interpreter, to ensure that individuals with hearing, vision, or speech disabilities are not excluded from any program or service.

The purpose of the effective communication rule is to ensure that a person with a vision, hearing, or speech disability can communicate with, receive information from, and share information with the City or other organizations that serve the public. The ADA places the responsibility for providing this effective communication, including the use of interpreters, directly on the government agency, business, or nonprofit. The City cannot require the person to bring someone else to interpret for them.

Together, these laws and regulations form the legal foundation for the City's Language Access Plan. The LAP ensures that our commitment to inclusion is not only a matter of values and priorities, but also a clear legal responsibility to provide equitable access for every member of our community.

#### 5. Roles and Responsibilities

Providing meaningful language access is a shared responsibility across the entire organization. Every City employee plays a role in ensuring that community members, regardless of the

language they speak or their communication needs, can fully engage with the City's programs, services, and activities. This section outlines the responsibilities of both individual employees and City leadership in making the LAP work in practice.

All City employees are expected to:

- Participate in training on language access policies, tools, and procedures as offered by the City.
- Recognize when language assistance may be needed and respond appropriately.
- Treat individuals with LEP and those who are D/HOH or have other communication needs with professionalism, patience, and respect.
- Inform community members that free language assistance is available when appropriate.
- Know how to access interpretation and translation resources when needed.
- Understand and follow guidance for using city-approved interpreters rather than relying on friends, family members, or unqualified individuals (except in emergencies).
- Document language assistance provided in accordance with the instructions in the City's Language Access Center.
- Direct questions to the Department of Customer Experience ([language@sugarlandtx.gov](mailto:language@sugarlandtx.gov)).

The City's LAP is coordinated by the Director of Customer Experience, who serves as the primary point of contact for implementation and oversight. This includes:

- Supporting Language Access Liaisons within departments.
  - Serve as a point of contact and subject matter expert (SME) for language access.
  - Update their teams on updates to language access resources, contracts, etc.
  - Ensure compliance with language access data reporting.
- Maintaining an inventory of available language services and related costs.
- Coordinating translation and interpretation services (see **Guidelines** for definitions).
- Ensure the language access budget is reflective of community needs.
- Leading annual assessments and updates of the LAP to ensure it continues to meet community needs.
- Overseeing training and guidance for Language Access Liaisons and other City employees to ensure they understand procedures and available resources.
- Monitoring compliance with federal, state, and local requirements related to language access.
- Tracking usage and effectiveness of language assistance services and reporting results to City leadership.
- Facilitating community feedback on language access needs and incorporating input into updates of the plan.
- Coordinating outreach to raise awareness of available language services within the community.

By working together, departments and employees help ensure language is not a barrier to accessing vital information, programs, and services.

## 6. Applicability

This LAP applies to all City programs, services, and activities, including those provided:

- In-person
- By telephone
- In writing
- Online
- Through any other means of communication

For public-facing events, such as community meetings, town halls, public meetings, outreach events, and other gatherings where community input or participation is encouraged, the City department organizing the event will determine the need for language access services on a case-by-case basis. This determination should be made early in the planning process and, when needed, in consultation with the department's Language Access Liaison and the Director of Customer Experience. Decisions will be guided by the purpose of the event, the audience, and the likelihood of participation by individuals with LEP or other communication needs. When language access services are provided, the department will make every effort to publicize their availability in advance so community members can fully participate. Additionally, once the event is over, departments will need to report the event that includes language access services using the self-reporting tool in the Language Access Center.

This policy extends to all City employees who interact with the public. It specifically addresses the needs of individuals with LEP, defined as those who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English.

The goal of this policy is to ensure that individuals with limited English proficiency, deaf or hard of hearing, or other communication challenges have meaningful access to the City's programs, services, and activities, enabling them to:

- Access information about the City's programs, services, and activities in a timely manner.
- Provide input on City decisions.
- Understand rights, responsibilities, and available resources.
- Apply for and receive services or benefits.
- Participate in City programs and activities.
- Communicate effectively with City employees.

During emergencies, and where applicable, the City of Sugar Land will use existing communication channels to share trusted resources:

### **U.S. Department of Homeland Security translated materials**

- <https://www.ready.gov/ready-your-language>
- <https://www.ready.gov/be-informed>.

## 7. Language Needs Assessment: The Four-Factor Analysis – Evaluating Accessibility

According to the U.S. Department of Justice, recipients of federal funding are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the City's programs, services, or activities.
2. The frequency with which LEP individuals come in contact with these programs, services, or activities.
3. The nature and importance of the program, service, or activity to people's lives; and
4. The resources available to the City and the likely costs of the LEP services.

The City examined the U.S. Census Bureau's 2022 American Community Survey (ACS) and was able to determine that approximately 41.7% (or 43,606) of the City of Sugar Land population age 5 and older spoke a language other than English at home. Asian and Pacific Islander comprised the largest non-English speaking language group. As the latest ACS survey indicates, of the 43,606 persons who speak a language other than English, 12,316 (28.2%) speak English less than "very well." The survey further indicates that 19,304 (18.4%) speak Asian and Pacific Island languages and 7,764 (40.2%) speak English less than "very well."

The breakdown for the other languages identified in the City is as follows:

- Spanish or Spanish Creole 8,729 (8.3%); speaks English less than "very well" 1,717 (19.7%)
- Other Indo-European 11,870 (11.3%); speaks English less than "very well" 1,938 (16.3%)
- Other languages 3,703 (3.5%); speaks English less than "very well" 897 (24.2%)

To make information more accessible and actionable, the City has developed an interactive [Language Access Map](#), displaying the percentage of LEP residents by census tract. This map enables departments to identify neighborhoods where language assistance services may be most needed, particularly when planning outreach, events, or public meetings. The map can be accessed in the City's Language Access Center.

## 8. Guidelines

The City aims to strike a practical balance between ensuring meaningful access to its services, programs, and activities for individuals with limited English proficiency (LEP) and other communication needs and managing available resources responsibly. While the cost of language assistance services may vary depending on the type and scope of services offered, these efforts should remain proportionate to the value and impact they provide.

### e) Data Collection

As a trailblazing, data-driven city committed to equitable service delivery, we know that meaningful progress starts with smart decisions backed by good information. To ensure the LAP effectively meets the needs of our diverse community, ongoing data collection and evaluation are essential. All City departments play a critical role in supporting this effort by consistently reporting language access interactions, as well as other relevant information, allowing the City to assess both the implementation of the plan and its outcomes. This collaborative, data-informed

approach ensures that we remain agile, responsive, and ahead of the curve in serving every member of our community.

To support the ongoing implementation of the LAP, a simple self-reporting tool will be made available in the Language Access Center on the City's employee engagement platform. This self-reporting tool is designed to help departments easily capture both quantitative and qualitative data, including, but not limited to, the number of interpretation requests, use of translated materials, and examples of successful interactions with non-English-speaking residents. Departments will also have the option to email [language@sugarlandtx.gov](mailto:language@sugarlandtx.gov) for their reporting needs.

Each employee who interacts with a LEP individual will be responsible for submitting updates promptly as data becomes available. Quarterly reminders will be sent out by the Department of Customer Experience to encourage regular participation. The data collected will be aggregated and used internally to identify trends, challenges, and opportunities for improvement; inform training and resource allocation; and guide updates to the LAP.

#### f) Signage

To ensure meaningful access to City services for individuals with limited English proficiency (LEP) and other communication needs, all City departments and offices must ensure that facilities open to the public display signage informing the public of their right to receive free language assistance.

This signage is a critical component of the City's commitment to equity and compliance with Title VI of the Civil Rights Act. It must be:

- Placed where it is easily visible to the public, such as entry points, reception areas, or other high-traffic customer service locations.
- Designed to clearly inform individuals that interpretation and translation services are available at no cost.

The City will be using iSpeak Cards. An iSpeak *card* is a tool used to help individuals with limited English proficiency (LEP) and other communication needs identify the language they speak so that employees can quickly arrange appropriate interpretation services. The card typically contains the phrase "I speak..." in multiple languages, allowing the individual to point to their language on the card. iSpeak cards are used in person to eliminate confusion, speed up service, and ensure that language assistance is provided accurately and efficiently.

iSpeak templates will be available in the Language Access Center on the employee engagement platform.

Required iSpeak Signage must include one or more of the following:

1. iSpeak Sugar Land electronic language identification card

2. iSpeak Sugar Land poster [e.g., [https://www.austintexas.gov/sites/default/files/files/236122\\_ispeak\\_desktop-display\\_final\\_Revised.pdf](https://www.austintexas.gov/sites/default/files/files/236122_ispeak_desktop-display_final_Revised.pdf)]

Each department's Language Access Liaison is responsible for maintaining updated signage, replacing damaged or outdated materials promptly, and ensuring that front-line employees are trained in assisting LEP individuals using these tools

If there are questions about placement, departments should consult the Department of Customer Experience for guidance.

#### g) Translation

What does it mean to **translate**? A translator is someone who converts a written text to another language, in writing.

To support equitable access to services, each City department will be responsible for identifying and prioritizing its own set of vital documents. Vital documents are defined as any materials that contain essential information required for individuals to access City services, programs, and activities, understand their rights, or meet legal or procedural requirements. When determining whether a document is vital, departments should consider factors such as the impact on an individual's rights or benefits, the frequency with which the document is used or requested, and whether the information is needed to access a City service or comply with a requirement. Departments may consult the Department of Customer Experience for guidance as needed.

In addition, the City will ensure that **multilingual and accessible digital content** is available on its official website and related platforms. This includes translated web pages for high-traffic services and downloadable PDFs of vital documents. City employees will be trained on how to access these language resources and guide residents in using them effectively.

Where full translation of a vital document is not feasible due to length, complexity, or frequency of updates, departments will provide translated summaries that convey the essential information in plain language. Translations and summaries should meet City accessibility standards to ensure they are easy to read and understand. The list of vital documents should be reviewed annually to ensure it remains up to date with current services, laws, and community.

Instructions for accessing translation services, including a list of approved vendors, step-by-step request procedures, formatting requirements, and estimated turnaround times, will be available in the Language Access Center on the City's employee engagement platform. Departments should follow these instructions to ensure translation quality, consistency, and compliance with City standards. For additional support or questions, employees may contact their Language Access Liaison or the Department of Customer Experience.

#### h) Interpretation

**What does it mean to interpret?**

An interpreter is someone who converts an oral or signed message from one language to another. Interpretation is spoken or signed communication.

Departments should be prepared to provide qualified interpreters, free of charge, either in person, over the phone, or through video remote technology to communicate with individuals with LEP or who are D/HOH. While individuals with LEP and/or those who are D/HOH have the right to refuse language assistance services, employees are encouraged in these situations to reiterate the City's policy to ensure meaningful access and remind individuals that these services are provided at no cost.

When arranging or requesting interpretation services, department employees should make every effort to confirm that the interpreter provided matches the language and/or language variant used by the individual(s) with LEP or who are D/HOH, and that they can fully understand one another. Departments must also give primary consideration to the method of communication preferred by an individual who is D/HOH. Consistent with that approach, there may be a need to utilize a Deaf Interpreter, Certified Deaf Interpreter (CDI), Communication Access Real-Time Translation (CART), or another auxiliary aid or service requested by the individual.

The City has contracted interpretation services, and the use of this service is recommended for one-on-one interactions when a three-way phone conversation with a human interpreter is needed. This service provides on-demand interpretation services for more than 240 languages, including American Sign Language (ASL) through video chat.

Instructions for accessing interpretation services, including step-by-step procedures, approved vendor contact information, tips for ensuring clear communication, and troubleshooting guidance will be available in the Language Access Center on the City's employee engagement platform. Departments should refer to these instructions before arranging services and may contact their Language Access Liaison or the Department of Customer Experience ([language@sugarlandtx.gov](mailto:language@sugarlandtx.gov)) for additional support.

#### i) Bilingual/Multilingual Employees

The City, when absolutely necessary, may use screened bilingual or multilingual employees to provide interpretation, whether in person, over the phone, or through other communication channels. The City will take reasonable steps to identify bilingual/multilingual employees who are interested in serving in this capacity and maintain a list of employees who have successfully met screening requirements. Employees on this list will receive information in interpreter ethics, accuracy, confidentiality, and basic interpreting skills. This option should be used only when a qualified contracted interpreter is not available in a timely manner or when the use of an internal screened interpreter is the most effective solution for the situation. Unscreened employees should not provide interpretation except in an emergency. All interpretation provided by screened bilingual/multilingual employees should be documented in accordance with City language access reporting procedures. For medical and court interpretation, additional requirements apply, and a qualified external interpreter must be used.

## j) Language Access Training

Training is essential to ensure that all City employees understand their responsibilities under the LAP and are equipped to serve residents with LEP effectively and respectfully.

### 1. New Employee Onboarding

All new City employees will receive an introduction to the LAP as part of their onboarding process. This training will:

- Explain the purpose and importance of the LAP.
- Outline the City's legal obligations and service standards for LEP individuals.
- Introduce employees to available resources, including interpretation and translation services.
- Clarify each employee's role in supporting equitable access to City programs and services.

This foundational training ensures that new employees begin their roles with a clear understanding of the City's commitment to providing meaningful access to its services, programs, and activities for individuals who are non-English speaking, have LEP, are D/HOH, have a disability, or others with communication challenges that require compliance with ADA effective communication rules.

### 2. Annual Training for All Employees

In addition to onboarding, all City employees will complete **the annual LAP training** to reinforce knowledge and keep employees up to date with any changes to the plan.

The annual training course will consist of the following components:

- **Review of the LAP:** Employees will be required to read or review an updated version of the LAP each year.
- **Acknowledgment of Review:** Completion will be documented on the City's training platform.
- **Knowledge Check:** A brief quiz will follow the acknowledgement to confirm employee understanding of key concepts, procedures, and available resources.

This training ensures that employees across all departments remain informed and engaged in supporting language access, and that the plan is operationalized consistently throughout the organization.

### 3. Tracking and Compliance

Completion of onboarding and annual training will be tracked in the City's Training platform. Department leadership will be responsible for ensuring compliance among their employees.

People & Culture will monitor citywide training completion rates annually and report that information to the Director of Customer Experience.

## 9. Language Access Complaints

Any individual or organization who believes they have been denied adequate access (e.g., being denied an interpreter, having an unqualified interpreter, unprofessional behavior from an interpreter, etc.) to City services, programs, or activities due to language barriers has the right to submit a Title VI complaint. Concerns may relate to a single incident or reflect a broader pattern of non-compliance with federal language access requirements.

A complaint may be submitted directly by the affected individual or by a person or organization acting on their behalf. City of Sugar Land employees are strictly prohibited from retaliating against any individual or group submitting a complaint. All complainants must be treated respectfully and provided with the same level of service as any other member of the public.

### **How to File a Complaint**

If a member of the public expresses the desire to file a complaint regarding language access, City employees must immediately notify the Director of the Department of Customer Experience and the ADA & Title VI Coordinator and provide the individual with the following resources:

1. The City of Sugar Land Language Access Complaint Form – available on the City’s website and in the Language Access Center on the City’s Employee Engagement Platform.
2. The URL to the online complaint submission page.  
(<https://www.sugarlandtx.gov/DocumentCenter/View/6072/Title-VI-discrimination-complaint-form?bidId=>).
3. Email address: [language@sugarlandtx.gov](mailto:language@sugarlandtx.gov).
4. Mailing address for submitting a completed form: PO Box 110, Sugar Land, TX 77487
5. Phone number for requesting assistance: 281-275-2900.

### **Accessibility**

- Complaint forms and submission instructions will be available in the most frequently encountered languages in the City.
- Interpretation services will be provided free of charge to assist complainants in completing and submitting a complaint.

### **Recordkeeping and Reporting**

All complaints will be documented and tracked by the ADA & Title VI Coordinator for compliance

monitoring and performance improvement. Summary reports of complaint activity will be reviewed annually to identify trends, training needs, or policy updates.

## 10. Monitoring and Continuous Improvement

The purpose of this section is to ensure that language access services remain accurate, effective, and consistent across all City service areas, while evolving to meet the needs of our community. Monitoring and continuous improvement activities help identify what is working well, where adjustments are needed, and how to enhance service delivery over time.

The City will use the following ongoing procedures to monitor and strengthen LAP efforts:

- Conduct annual reviews of new and existing vital documents to ensure translations are accurate, clear, and up to date.
- Track and report on the use of language assistance services, including interpretation and translation requests, to assess demand and identify trends.
- Review public website analytics for language access materials and services to evaluate reach and engagement.

### **Annual Review**

The LAP will be reassessed and updated at least once per year to ensure that the scope and nature of language assistance services reflect:

- Updated demographic information on relevant LEP populations.
- Changes in technology or service delivery methods.
- Department experiences and lessons learned during implementation.

The Director of Customer Experience is responsible for the annual review, with the LAP project team conducting the assessment and preparing recommended updates.

## 11. Corresponding City Procedures and Policies

Demographics Information Policy. [<https://cityofsugarlandtx.workvivo.us/docs/20133>]

Title VI/Nondiscrimination Plan Fiscal Year 2025.

<https://www.sugarlandtx.gov/DocumentCenter/View/40476/Title-VI-Plan-FINAL-FY2025?bidId=>

## 12. Resources

Resources, including how to access language access services, are available in the Language Access Center on the City's employee engagement platform.

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- Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs. [https://www.lep.gov/sites/lep/files/resources/2011\\_Language\\_Access\\_Assessment\\_and\\_Planning\\_Tool.pdf](https://www.lep.gov/sites/lep/files/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf)
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## 14. Definitions

The City uses the following terms as defined below for the purposes of this plan:

**Bilingual Employees** means persons who are bilingual in two languages and are able to conduct the business of the workplace in either of those languages.

**Certified Deaf Interpreter (CDI)** means 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.

**Communication Access Real-Time Translation (CART)** means 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.

**Deaf/deaf (D/d)** means 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.

**Deaf Interpreter** means 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.

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

**Equity** means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

**Hard of hearing (HOH)** means 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.

**Interpretation** means 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.

**Language Access** means the right of individuals with LEP to receive meaningful, timely access to programs, services, and vital information by the provision of a language assistance service.

**Language Assistance Services** means 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 City.

**Limited English Proficiency (LEP)** means individuals who: a. do not speak English as their primary language; and b. have a limited ability to read, write, speak, or understand English. Individuals with LEP may be competent in English for certain types of communication (e.g., speaking or understanding), but have limited proficiency in English in other areas (e.g., reading or writing). LEP designations are also context-specific; an individual may possess sufficient English language skills to function in one setting (e.g., conversing in English with coworkers), but these skills may be insufficient in other settings (e.g., addressing court proceedings). An individual who is 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.

**Meaningful Access** means the provision of language assistance services that results in accurate, timely, and effective communication at no cost to the person who is LEP. For individuals who are LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

**Primary Language** means the language in which an individual most effectively communicates when interacting with society, including sign language or tactile sign language. An individual's primary language may be a language variant.

**Multilingual Employee** means an employee who has proficiency in English and the ability to read, write, or speak in at least one other language.

**Sign Language** means the method of communication for people who are D/HOH in which hand movements, gestures, and facial expressions convey grammatical structure and meaning. There is no universal sign language. Different sign languages are used in different countries or regions. For example, British Sign Language (BSL) is a different language from ASL, and individuals who know ASL may not understand BSL.

**Translation** means the process of converting written text from a source language into an equivalent written text in a target language as fully and accurately as possible while maintaining the style, tone, and intent of the text, while considering differences of culture and dialect.

**Vital Document** means paper or electronically written material that contains information that is critical for accessing a department's services, programs, or activities, or is required by law.