



Administrative Manual of Operating Procedures

Procedure #: 04.01	Procedure Title: Language Access and Culturally and Linguistically Appropriate Services (CLAS) Policy		Revision #: 1.0
Original Issue Date: 02/19/2026	Revised Issue Date: N/A	Next Review Date: 02/19/2028	Responsible Department: Office of Equity
Statutory References: This policy is authorized under federal civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 1557 of the Affordable Care Act, and Executive Order 13166, the Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA) of 2008, as well as applicable state and local regulations.		Ordinance References: Resolution File No. 23-8333	
Appendices: Appendix A – CLAS AMOP Training PowerPoint Appendix B – CLAS AMOP Flowchart Appendix C – Your Right to An Interpreter Poster Appendix D – Administrative Directive for Generative AI		Forms: Office of Equity Language Access Technical Assistance Form	

1. OBJECTIVE:

Milwaukee County is committed to providing culturally and linguistically appropriate services to residents with limited English proficiency (LEP) and those who use alternative communication formats. All departments shall take reasonable steps to ensure that residents can access Milwaukee County programs, services, and activities in their preferred language and in a manner that is understandable and respectful.

This procedure establishes a County-wide framework to ensure that all residents, regardless of their preferred language, literacy level, or cultural background, have meaningful access to Milwaukee County care, programs, services, and resources. In alignment with [the U.S. Department of Health and Human Services’ National Standards for Culturally and Linguistically Appropriate Services \(CLAS\)](#), this procedure supports Milwaukee County’s commitment to equitable service delivery and effective communication with all communities, which in turn improves the quality of life through access to information.

2. DEFINITIONS:

- A. Co-Governance Model. A shared decision-making process that includes designated County staff, and community stakeholders—particularly those representing linguistically diverse populations—to guide, review, and evaluate Milwaukee County materials, outreach strategies, and services for cultural and linguistic responsiveness.
- B. Culturally and Linguistically Appropriate Services (CLAS). Services that are respectful of and responsive to the cultural and linguistic needs of Milwaukee County residents.
- C. Essential Documents. Forms, notices, or information that provide residents with an understanding of Milwaukee County programs and services or to understand their rights and obligations.
- D. Language Access and Cultural Responsiveness Advisory Council. The Advisory Council provides feedback on multi-language communication tools, strategic direction for language access equity, and oversee resources for language access support services and best practices.

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- E. Language Access Coordinator. The Milwaukee County Office of Equity’s Strategic Communications Manager role is to coordinate the government entity's efforts to provide language access services.
- F. Language Access. The provision of oral interpretation and written translation services to ensure meaningful communication between Milwaukee County staff, contracted providers who work on behalf of Milwaukee County, and residents.
- G. Liaison. A person who is knowledgeable of department operations, is an identified person facilitating requests for language access support and is familiar with how to access the Office of Equity for technical assistance and reporting.
- H. Limited English Proficiency (LEP). People who do not speak English as their primary language or who have a limited ability to read, write, speak, or understand English. Milwaukee County is committed to providing equal opportunity in all programs, services, and activities to individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Those individuals are referred to as limited English proficient, or “LEP.” Meaningful access to federally funded programs and activities is required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

3. ROLES AND RESPONSIBILITIES

A. Milwaukee County Office of Equity (OOE)

- i. The Milwaukee County Office of Equity (OOE) shall serve as the lead department responsible for guiding, coordinating, and monitoring the implementation of this policy across all County operations. OOE shall also lead the establishment of a co-governance model with community stakeholders to ensure that the lived experiences, cultural knowledge, and linguistic diversity of County residents inform language access strategies and materials. The duties of OOE include the following:
 1. Lead and coordinate the County’s language access efforts and CLAS compliance.
 2. Develop and maintain County-wide procedures, tools, and standards for translation, interpretation, and communication accessibility.
 3. Establish and maintain a Community Co-Governance/Language Access and Cultural Responsiveness Advisory Council (Advisory Council for reference in this document) composed of residents, community-based organizations, and multilingual stakeholders to guide implementation and evaluation.
 4. Ensure that the co-governance process informs the design, translation, and distribution of public-facing materials to ensure cultural relevance.
 5. Provide technical assistance, staff training, and resources to departments.
 6. Host an annual information collection and support meeting with department liaisons as part of its monitoring compliance and reporting progress on the implementation of this policy. The meeting will focus on reporting of metrics, identifying gaps, and needs for supporting language access programs.
 7. Engage with community stakeholders to assess language needs and barriers.
 8. Maintain a list of firms and community organizations that provide translation services, verbal and or written.

B. Department of Administrative Services – Information Management Services Division (DAS-IMSD)

- i. DAS-IMSD shall provide technical solutioning, implementation, and maintenance of technology solutions that enhance the County’s language access activities. This includes:

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- a. Providing County employees with training on Microsoft 365 applications and their multilingual, translation, and closed captioning capabilities. This includes, but is not limited to, Microsoft Teams, Microsoft Bookings, Microsoft Forms, and Microsoft Office (e.g., Word, Excel, PowerPoint, Outlook, etc.).
 - i. IMSD provides regular training on the Microsoft 365 apps, which employees can sign up for via CountyConnect ([Technology Training](#)). Translation-related training will be coordinated with IMSD and available on this webpage when complete.
 - b. Maintain and support the County’s web site content management solution (CMS) to provide translation capabilities.
- C. Office of Strategy, Budget, and Performance (SBP)**
- i. Through the Office of Strategy, Budget, and Performance (SBP), Titan content management software for the County’s website completed accessibility updates in 2025.
 - ii. It now has a translation feature in the top navigation bar per industry best practices. The update allows content managers to be more linguistically accessible for web visitors with more than 100 languages available. SBP will also work with IMSD to ensure this functionality is accessible for different abilities as well (screen readers, etc.).
- D. Milwaukee County Clerk**
- i. Provides closed captioning hardware and software, in select languages and as technically available, for Milwaukee County Board of Supervisors meetings.
- E. All County Departments**
- i. All Milwaukee County departments will be responsible for executing actions as follows:
 1. Identify essential documents and services that require translation or interpretation. For balancing broad community access with operational efficiency, if 5% or 1,000 total residents/customers (whichever is less) served by the department have Limited English Proficiency, the best practice is to translate the written materials (e.g., application form or handbook). This follows the federal 5%- or 1,000-persons rule of a population, and it also encompasses Milwaukee County’s “no wrong door” service model. For general information (marketing or event flyers), best practices suggest using AI-assisted translation or clear plain-English summaries as a secondary measure. (See [Appendix D-Administrative Directive for Generative AI](#))
 2. Collaborate with OOE and the Language Access and Cultural Responsiveness Advisory Council to ensure department materials and outreach reflect community input.
 3. Notify residents of their right to free language assistance services.
 4. Ensure staff are trained in accessing interpretation and translation services.
 5. Each department will designate a Language Access Liaison to coordinate its efforts. The OOE Strategic Communication Manager will convene trainings and serve as a resource contact through the OOE [Technical Assistance](#) process (including but not limited to translation or interpreter referrals, recommended tools, and referrals for review/confirmation of materials). The Language Access Liaison responsibilities will include:
 - a. Serving as the primary point of contact for language access within the department.
 - b. Attending quarterly meetings hosted by the Office of Equity and the Advisory Council.
 - c. Completing required training on language access and CLAS standards.
 - d. Coordinating translation and interpretation requests for the department.

- e. Maintaining a list of department-specific essential documents and ensuring timely translation.
- f. Ensuring staff are aware of and follow language access procedures.
- g. Participating in periodic reviews and providing feedback on implementation.

4. PROCEDURE:

- A. **Language Identification:** Departments shall use standardized tools, developed with support from OOE, to help identify residents’ preferred language. ([Appendix C-Your Right to an Interpreter Poster](#))
- B. **Interpretation Services:** To deliver the best customer service possible, departments should provide qualified interpreters for in-person, phone, or virtual communication. Family members who are minors should not be used as interpreters except in emergencies.
- C. **Translation of Essential Documents:** Departments will translate essential documents into the most frequently encountered languages in Milwaukee County, as determined by OOE in consultation with demographic data and community feedback through the co-governance model. On an annual basis, departments should conduct a review of essential documents led by liaisons to be completed by year-end. For new documents and collateral materials that are being created, there should be translated versions released simultaneously reflecting the same formatting and design. Translations can be completed through contracting with translation firms or by using artificial intelligence (AI) platforms (Microsoft 365 preferred). If AI is used, the Language Access Liaison must review the translation’s accuracy with a person who knows the language fluently.
- D. **Cultural Responsiveness Review:** Before sharing publicly, departments’ translated materials departments can ask for members of the Community Co-Governance/Advisory Council to review content for clarity, accuracy, and cultural appropriateness. To request a review, the department liaison should contact OOE’s Strategic Communications Manager, who will identify members and facilitate the review process.
- E. Departments are advised to include the cost of translation support when completing the Racial Equity Budgeting tool as part of its overall planning process.
- F. **Notice to the Public:** Departments shall display notices informing the public of free language assistance services. On County Connect and under “[Technical Assistance](#)” on the OOE website, there will be a resource support page for language access that will include sample signage and verbiage for departments to download and use.
- G. **Training:** OOE will provide ongoing training and resources to Milwaukee County staff to strengthen cultural competence and improve service delivery for all residents.
- H. **Monitoring and Evaluation:** OOE and the Advisory Council shall conduct periodic reviews and collect feedback to assess effectiveness, identify gaps, and promote continuous improvement.

5. REVISION HISTORY:

Rev. #	Summary of Changes	Date of Change	Author
1.0	Initial release	2/5/2026	Office of Equity Staff