



Limited English Proficiency Policy and Procedures

Effective July 1, 2023

I. PURPOSE:

To ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in services, activities, programs and other benefits in the North Central Workforce Development System which includes the program offered by Workforce Solutions as well as all PA CareerLink centers in the North Central Workforce Development Area.

II. REFERENCES:

- Workforce Innovation and Opportunity Act of 2014 (WIOA or Opportunity Act), Public Law (Pub. L.) 113-128, enacted July 22, 2014
- 29 CFR Part § 38.4 §38.9, §38.40, §38.54

III. Policy:

The North Central Workforce Development Board and all PA CareerLink(R) centers will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of The North Central Workforce Development Board and all PA CareerLink(R) centers is to ensure meaningful communication with LEP customers. The policy also provides for communication of information contained in vital documents, including but not limited to, waivers; applications; eligibility forms, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served.

Language assistance will be provided through use of competent bilingual interpreters through Language Line Services, Inc. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

In accordance with 29 CFR 38.9 (g)(3), Recipients must include a "Babel notice," indicating in appropriate languages that language assistance is available in all communications of vital information, such as hard copy letters or decisions or those communications posted on Web sites. Vital information is defined as information, whether written, oral or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service and/or training.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

The North Central Workforce Development Board and all PA CareerLink(R) centers will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards," available online at www.lep.gov) or posters to determine the language. In addition, when records are kept of past interactions with customers the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTERPRETER

The Equal Opportunity Employment Officer for the Workforce Development Board and PA CareerLink® Site Administrators are responsible for:

- (a) Maintaining accurate and current instructions on how to access Language Line Services, Inc.
- (b) Contacting Language Line Services, Inc. to interpret, in the event that an interpreter is needed.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and **after** the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

4. PROVIDING NOTICE TO LEP PERSONS

The North Central Workforce Development Board and all PA CareerLink(R) centers will at a minimum, post notices and signs in intake areas and other points of entry.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, **The North Central Workforce Development Board and all PA CareerLink(R) centers** will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, **The North Central Workforce Development Board and all PA CareerLink(R) centers** will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons and feedback from customers.

IV. Action Required

None

V. INQUIRIES

If you have questions about this policy please contact one of the following:

| | | |
|--------------|--|---------------|
| Pam Streich | pstreich@ncwdb.org | (814)245-1835 |
| Donna Hottel | dhottel@ncwdb.org | (814)245-1835 |
| Linda Franco | lfranco@ncwdb.org | (814)245-1835 |

VI. EXPIRATION:

Ongoing

VII. HISTORY

| Name | Date | Description of Change | Effective Date |
|---|----------------|---|----------------|
| Pam Streich Linda Franco Donna Hottel | June 26, 2023 | Updated to include reference to Babel Statement and new policy format | July 1, 2023 |
| Pam Streich Linda Franco | May 1, 2022 | Addition of references to the policy | May 1, 2017 |
| Pam Streich Linda Franco | August 1, 2017 | Updated to reference Workforce Solutions as the new agency providing staff to the North Central Workforce Development Board | August 1, 2017 |

Auxiliary aids and services are available upon request to individuals with disabilities.

Equal Opportunity Employer/Program

Funded in whole or in part by Federal Funds. Detailed information can be found at: <https://www.workforcesolutionspa.com/categories/resources/pages/stevens-amendment>