



LIMITED ENGLISH PROFICIENCY (LEP) POLICY AND PROCEDURES

I. PURPOSE:

This document establishes Workforce Solutions for North Central PA's policy and procedures regarding Limited English Proficiency (LEP). The purpose is to ensure that persons with LEP have meaningful access and an equal opportunity to participate in services, activities, programs, and other benefits provided through Workforce Solutions and 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 113-128
- 29 CFR Part 38, including §38.4, 38.9, 38.40, 38.54

III. BACKGROUND:

Workforce Solutions for North Central PA recognizes that individuals with limited English proficiency may encounter barriers when accessing workforce development programs and services. Federal regulations require recipients of WIOA funds to take reasonable steps to ensure that LEP individuals have meaningful access. This policy is designed to remove barriers, promote equal access, and comply with federal nondiscrimination requirements.

IV. DEFINITIONS:

Limited English Proficiency (LEP) – Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Vital Information – Information, whether written, oral, or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training.

Interpreter – A qualified individual who conveys meaning orally from one language to another.

Translation – The conversion of written text from one language to another.

V. POLICY:

- A. Workforce Solutions for North Central PA and all PA CareerLink® centers will take reasonable steps to ensure that persons with LEP have meaningful access and an equal opportunity to participate in services, activities, programs, and other benefits.
- B. Meaningful communication with LEP customers will be provided, including access to interpreters, translators, and other aids at no cost to the individual.

- C. Language assistance will be provided through competent bilingual interpreters, including contracted services such as Language Line Services, Inc. or Propio Language Services, which may include Video Remote Interpreting (VRI).
- D. Staff will receive notice of this policy and, where appropriate, training in effective communication techniques, including the use of interpreters.
- E. In accordance with 29 CFR §38.9(g)(3), all recipients must include a “Babel notice” in communications of vital information, indicating in appropriate languages that language assistance is available.

VI. PROCEDURES:

- 1. Identifying LEP Persons and Their Language
Staff will promptly identify the language and communication needs of LEP individuals using language identification cards (“I Speak” cards) or posters. When possible, language preferences will be recorded in customer records for future reference.
- 2. Obtaining a Qualified Interpreter
The Equal Opportunity Officer and PA CareerLink® Site Administrators will maintain instructions on accessing language services. Interpreter services will be secured when necessary through contracted vendors. LEP individuals may request to use family or friends as interpreters only after being offered free interpreter services. If a family member or friend is not competent, staff will provide a professional interpreter.
- 3. Providing Notice to LEP Persons
Notices will be posted in intake areas and other points of entry, informing customers of available language assistance services.
- 4. Monitoring Language Needs and Implementation
Workforce Solutions and PA CareerLink® centers will regularly assess demographics, service needs, and feedback from LEP customers to ensure continued effectiveness of this policy.

VII. POLICY EXCEPTIONS:

Any discrepancies between Workforce Solutions policies and federal or state provisions due to revisions will default to current federal and state regulations. Workforce Solutions policies may impose stricter requirements but will never fall below minimum federal and state requirements.

VIII. RESCISSIONS:

None

IX. EXPIRATION:

Ongoing

X. INQUIRIES:

Questions shall be directed to:

Pam Streich, Executive Director at pstreich@ncwdb.org; or

Tonya Mauk, Oversight and Project Manager at tmauk@ncwdb.org; or

Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org;

Workforce Solutions for North Central PA

425 Old Kersey Road

Kersey, PA 15846

(814) 245-1835

XI. POLICY HISTORY:

This policy is reviewed annually (at a minimum), typically during the first week of July, by Workforce Solutions' staff to assess and implement any necessary changes, edits, updates, and revisions.

Name of Staff Reviewer	Date of Review	Description of Change(s)	Effective Date
Tonya Mauk, Pam Streich, Donna Hottel	February 20, 2026	Addition to EO tagline	February 20, 2026
Pam Streich	January 5, 2026	Removal of staff person due to retirement	January 5, 2026
Pam Streich Linda Franco Donna Hottel	August 22, 2025	Reviewed and updated to new format	July 1, 2025
Pam Streich Linda Franco Donna Hottel	September 3, 2024	Updated to include Propio Language Services	September 3, 2024
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.

Workforce Solutions is an Equal Opportunity Employer/Program

For more information on the Stevens Amendment and Funding, visit:

<https://www.workforcesolutionspa.com/categories/resources/pages/stevens-amendment>