


**Date:** October 1, 2007

**To:** Pacific Gateway Workforce Investment Network Staff  
Network Sub-Recipients  
Network Partners

**From:** Bryan S. Rogers   
WIB Executive Director

**Subject:** **POLICY MEMORANDUM: WDB-24**  
**LIMITED ENGLISH PROFICIENCY (LEP)**

**EFFECTIVE DATE**

This policy is effective upon date of issue.

**PURPOSE**

The purpose of this policy is to ensure meaningful and equal access to programs and services to Network customers who are limited English proficient.

**BACKGROUND**

Federal regulations require all recipients of federal funds to take reasonable steps to ensure meaningful access to their programs and services to those individuals who are limited English proficient (LEP).

**POLICY**

It is the policy of the Pacific Gateway Workforce Investment Network to provide universal access to Workforce Investment Act programs and services to all customers, including those customers who are limited English proficient (LEP). In order to ensure universal access is provided to all customers, the Network has incorporated the five elements outlined in the Department of Labor's Federal Register into the LEP procedures.

1. Identifying LEP Individuals Who Need Language Assistance
2. Language Assistance Measures
3. Training Staff
4. Providing Notice to LEP Persons
5. Monitoring and Updating the LEP Plan

**PROCEDURES**

Utilizing the DOL's five elements as a guideline, the following procedures have been developed:



## 1. Identifying Individuals Who Need Language Assistance

To identify LEP individuals who need language assistance, the Network utilizes the four-factor analysis recommended by DOL in the Federal Register:

- a. The number or proportion of LEP persons served or encountered in the eligible service population;
- b. The frequency with which LEP individuals come in contact with the program;
- c. The nature and importance of the program, activity, or service provided by the recipient; and
- d. The resources available to the recipient and costs.

In the Network's WIA area, it has been determined that the two most predominant languages are English and Spanish. This information was found through researching census data in our local area on LEP's specific to our area, demographics, unemployment rates, and through analyzing our customer flow.

In assisting LEP customers and to ensure universal access to WIA programs and services, the following steps will be taken:

- a. Posting signs in all the Network Centers in the two most dominant languages.
- b. Use of "I-Speak Cards", which are used to assist LEP customers in identifying their language needs.
- c. Use of "Spoken Languages" list, which includes the names of the bilingual staff members and the languages they speak. This reference tool helps provide LEP customers with timely language assistance.

## 2. Language Assistance Measures

There are several ways that language assistance is provided at the Network Centers:

- a. **In Person:** Information Sessions, which provide detailed overview of the programs and services available at the Network Centers, are offered in Spanish for those LEP customers. If a customer is unable to attend a session, an individual appointment with bilingual staff person is scheduled. If a bilingual staff person is unavailable to schedule the appointment, the customer's name and phone number are requested in order to have the staff person call back within a specified or reasonable amount of time. If the customer is in need of immediate assistance, calls are made to other Centers to obtain the language assistance needed.
- b. **Over the Phone:** Calls received from LEP individuals are routed to bilingual staff
- c. **Written Communication:** Written communication is also routed to bilingual staff.

### **3. Training Staff**

Staff receives formal training twice a year on the procedure for assisting LEP customers; this is part of the Equal Opportunity (EO) training conducted or coordinated by the EO Officer. Staff also participates in additional EO training provided by the City of Los Angeles.

### **4. Providing Notice to LEP Persons**

Network Centers will provide notice in the predominant languages of the free language assistance available to all customers. The notices will be provided:

- Signs in the Centers
- Outreach documents including calendars and fliers

### **5. Monitoring and Updating the LEP Plan**

Monitoring and updates of LEP policies and procedures will be done on an annual basis.

## **REFERENCES**

Workforce Investment Act of 1998, Section 188

WIA Directive WIAD04-20, Limited English Proficiency (05-12-05)

WIA Directive WIAD01-21, Nondiscrimination and Equal Opportunity Procedure (06-25-02)

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (08-11-00)

Federal Register, Vol. 68, No. 103, Civil Rights Center, Enforcement of Title VI Of the Civil Rights Act of 1964, Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Notice (05-29-03)

Dymally-Alatorre Bilingual Services Act, Government Code Section 7290-7299.8  
Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 26-02, Publication of Revised Guidance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Person (05-29-03)

## **CONTACT**

Should you have any questions regarding this Policy Memorandum, please contact Arleen Ward at 562.570.3680 or TTY 562.570.4629.

Thank you.

BSR:GF:mh