ATTACHMENT 22. Accessibility Policy - Persons with Limited English Proficiency

EASTERN JACKSON COUNTY
WORKFORCE DEVELOPMENT BOARD

Serving Eastern Jackson County Mo. including:
Independence, Blue Springs, Lee's Summit, Grandview, Raytown,
Sugar Creek, Buckner, Grain Valley, Oak Grove, Lone Jack, and other municipalities.

The Full Employment Council, Inc. (FEC) is the fiscal
agent and workforce support organization for the
Eastern Jackson County Workforce Development Board.

Workforce Innovation and Opportunity Act (WIOA) Policy

ACCESSIBILITY & LIMITED ENGLISH PROFFICIENCY POLICY

POLICY NUMBER: 2021-04

EFFECTIVE DATE: 09-08-2021

APPROVED BY

Clyde McQueen, President/CEO
Managing Entity/Fiscal Agent
Kansas City and Vicinity Workforce Development Board

INQUIRIES
Questions about this issuance should be addressed by email to Andrea Robins, Sr. Director of Planning, Compliance and Management Systems at arobins@feckc.org, who shall disseminate the agency response after consultation with Workforce Development Board staff.

PURPOSE
The purpose of this issuance is to establish guidelines for access to program services for persons with disabilities, limited English proficiency and special needs. This Issuance is based on Missouri Division of Workforce Development (OWD) Issuance No. 04-2021, Access to Meaningful Services for Individuals with Limited English Proficiency (LEP). It also includes two (2) attachments: a Language Assistance Planning Self-Assessment Too; FEC Self-Assessment and; a Language Access Plan.

BACKGROUND
This Issuance addresses guidelines for compliance with the Americans with Disabilities Act of 1990 (ADA), as amended, WIOA guidelines, and State OWD policy. The DWD Issuance 06-2014, "Access to Meaningful Services for Individuals with Limited English Proficiency (LEP)" Policy was rescinded effective 09/08/2021.

FULL EMPLOYMENT COUNCIL ACCESSIBILITY POLICY

POLICY NUMBER: 2021-04

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POLICY
The Full Employment Council shall assure program and physical access to persons with disabilities, including communication access.

This includes the availability and use of assistive technologies, following practices associated with service delivery, making the public aware of the availability of such technology and practices, Staff training, and implementation of the Accessibility policy.

This policy also includes identifying language barriers and developing strategies to overcome those barriers are essential for state agencies to comply with federal requirements

A. ACCESSIBILITY

I. ASSISTIVE TECHNOLOGY:
In the public resource computer center, there shall be at least one adjustable height table to accommodate customers who use wheelchairs, as well as those small or large in stature.

For individuals with low vision, there shall be screen-enlargement software on computers and at least one large screen monitor.

Where computer assess is required, a trackball and alternative keyboard shall be available for use by individuals who have difficulty using a traditional mouse and/or keyboard.

Staff will be trained on accessibility practices and technology and will communicate with customers regarding the availability of accessibility practices and technology, as appropriate. This includes familiarity with Relay Missouri as an alternative telecommunications tool for individuals who are deaf, hard-of-hearing, deaf/blind, or have a speech impairment

Accessibility technology includes:

- Features built into the Microsoft Operating System (i.e., on-screen keyboard, voice input, sticky keys, bounce keys, other Microsoft software features).

- For individuals with a mild to moderate hearing loss, an assistive listening device (ALD) available for use in one-on-one and group settings. The Full Employment Council utilizes UbiDuo communication technology for typed captioned communication at each of its sites.

- Captioning display for viewing of videos.

- Amplified Telephone. Consumers will have access to telephones with high-grade amplification in areas with a suitable environment to utilize the telephone without noise interference.

- Telecommunications Device for the Deaf (TDD) with Printout. Individuals will have access to TDD devices that have message taking capabilities.

- Hands-Free Speakerphone with Large Keypad. Customers will have access to telephones that have speaker capabilities and can be used hands-free and have enlarged keypads.

- Flatbed Scanner. Customers will have access to flatbed scanners that are connected to computers that can convert an image from a printed page to a computer file.

- Speech Synthesizer and Screen Reading Software.

II.   ASSISTIVE TECHNOLOGY USES: DEVICES AND COMPUTER-BASED

The following tables provide information into devices and their uses (Table 1), and the accessibility features built into the Windows Operating System (OS). Staff should use these to understand assistive technology availability and uses.

Table 1: Devices and Associated Uses and Benefits

Device	Benefits
Assistive Listening Device	Hard-of-hearing individuals
Trackball (wired or wireless)	Mobility/dexterity impairments
Adapted keyboard	Mobility/dexterity impairments
Height Adjustable Table (with hand crank or motorized adjustment)	Mobility/dexterity impairments
Phone amplifier (in-line)	Hard-of-hearing individuals
Large screen monitor (22"–24")	Low vision individuals

Table 2: Windows OS Built-in Accessibilities Features for Inclusion

Feature	Benefits	Description
Magnifier	Low vision individuals	Enlarges portions of the screen making it easier to view text and images and see the whole screen. Has multiple levels of magnification and 3 magnification options: full-screen mode, lens mode and docked mode.
On-screen keyboard	Mobility/dexterity impairments	Displays a visual keyboard with all the standard keys.

Feature	Benefits	Description
		Used in conjunction with a mouse to select keys. Includes a text prediction feature that can be turned on and which speeds process up for users.
High contrast	Low vision individuals	If it's hard to read text on your screen, you can change the theme of your PC to a color combination that's easier to read.
Feature	Benefits	Description
Mouse keys, sticky keys, filter keys	Mobility/dexterity impairments	Alternative methods available for users who need a work around for common keyboard actions. When activated, Mouse Keys uses the arrow keys on the numeric keypad to move the pointer. Sticky Keys prevents someone from having to press three keys at once (e.g., Ctl+Alt+Del). When Sticky Keys is turned on, the user can do these functions by pressing one key at a time. Filter Keys will ignore keystrokes that occur in rapid succession and keystrokes that are held down several seconds unintentionally.

III.   SERVICE DELIVERY

People with disabilities shall be served in integrated settings and participate in programs and services of the Job Center alongside people without disabilities.

All customers are made aware of the availability of various types of accommodations or special assistance that enable everyone to take full advantage of Job Center services. Staff shall not single out individuals and offer specific aids based on their own intuitions or perceptions.

Printed publications are available (immediately or in a timely manner) in alternative formats such as Braille, large print, electronic text, and/or audio. Alternative methods shall be available, such as sign language interpreters certified at intermediate or above and assistive

listening devices. The Full Employment Council shall have request a one-day notice should alternative methods be requested.

Should a customer request other materials, the staff member receiving a request for alternate formats shall be directed to the Manager of Equal Opportunity/Community Recruitment. These alternative formats, as appropriate, shall be delivered to the customer in a reasonable amount of time. If further assistive technological devices are required to assure access to services, the Full Employment Council shall secure these devices or technology.

The Job Center has a procedure for responding in a timely manner to requests for auxiliary aids and services not readily available in the center (i.e., specialized assistive technology). The Job Center has identified a source for certified American Sign Language interpreters and can respond to interpreter requests.

IV. PUBLIC AWARENESS

A list or notice that auxiliary aids and services for communication, assistive-technology devices, and materials in accessible formats are available shall be made known in writing or verbally to all customers, regardless of whether they disclose, or appear to have, a disability. Customers should be uniformly informed that they have a right to request accommodations, however unsolicited offers of specific formats or devices to individual customers shall be avoided. Such unsolicited offers can be perceived as a reflection of staff perceptions or stereotypes about particular disabilities and are contrary to the Americans with Disabilities Act (ADA).

V. STAFF TRAINING

Quarterly training will occur to assure Staff recognize the importance of making people with disabilities feel welcome, have a basic awareness on how to meet the needs of customers with disabilities, understand that they are required to provide reasonable accommodations to customers with disabilities.

Staff members shall be aware of, know how to access, and have a basic understanding of how to use assistive technologies, both stand-alone devices and accessibility options built into the computer operating system, and how to assist customers in their use. Functional Leaders will coordinate with the Job Center Disability Navigators to arrange trainings on a quarterly basis.

VI. IMPLEMENTATION

- Architectural access in compliance with the ADA shall be maintained at all locations.

- Training and/or technical assistance on an on-going basis shall be provided to staff regarding the use of basic assistive technology, procedures and local resources available for the arrangement of access services such as sign language, interpreting, braille transcription, how to respond to specific requests for auxiliary aids and services, and guidance on disability etiquette and culture.

- The Full Employment Council shall have materials, in a variety of accessible formats and media, to market the availability of accessible technologies.

VII. Data Collection and Recording:

FEC staff will collect and record data on limited English proficiency and preferred language of each applicant, registrant, and participant. FEC will utilize the Wagner-Peyser application, WIOA application and the ABC application located in the Jobs.mo.gov to record and collect data. The planning department will generate reports from the Jobs.mo.gov tracking system and develop reports for all reporting purposes. FEC will also record client data in their person tracking system "Apricot Solutions" store and generate reports.

B. LIMITED ENGLISH PROFICIENCY

I. CUSTOMERS WITH LIMITED ENGLISH PROFICIENCY

General Policy:

Per The Full Employment Council's policy on accommodation (2017-004, Modification 1) (FEC), complies with the Americans with Disabilities Act (ADA) and is committed to the fair and equal employment of people with disabilities and Limited English Proficient individuals. FEC does not discriminate against qualified job applicants or employees with disabilities with regard to job application procedures, hiring, employee compensation, advancement, services, training, discharge or other terms, conditions and privileges of employment.

If a customer with limited English proficiency whose primary language is other than English request services, Staff should serve this person with respect to the appropriate workforce resources of the Job Center. Staff members will proceed using the provision of language interpretation/translation service process as stated in the policy.

Staff Members will communicate with the customer utilizing the Language Link (Attachment C) if the Staff Member is not able to communicate proficiently with the customer in the customer's primary language. The Language Link is a telephonic source for interpreters and is accessible at (800) 208-2620.

Notification of services:

Through our website, postings throughout the job center, and on all of our flyers, and outreach events, we provide information for individuals in need of LEP services. All items above will be updated on an as needed basis.

Identifying "most used languages":

The Full Employment Council uses the initial Jobs.mo.gov data that recognizes the most used

languages other than English. We also utilize the State's Equal Opportunity Department provided data, reporting on most commonly spoken languages in our area.

Complaints and Grievances:
All complaints and/or grievances will be governed according to the Full Employment Council's Complaint and Grievance Policy. (FEC Issuance #2013-02 Mod 4)

The Equal Opportunity Manager, and Equal Opportunity Compliance Specialist will oversee the implementation of the LEP plan.

Provision of language interpretation/Translation Services:
Qualified job applicants, customers, and employees with additional needs shall be provided reasonable employment-related accommodations when necessary, unless the accommodation would impose an undue hardship. This policy provides guidelines for employees, service recipients, and job applicants who wish to apply for reasonable accommodations with FEC and prescribes the steps to take if he or she is the victim of discrimination or retaliation in his or her request for an accommodation.

II. MAKING ACCOMODATION REQUESTS

1. Employees, and customers may request an accommodation by requesting it from any staff/management of the Full Employment Council.

2. Limited English proficient individuals will be guided to a State provided "point to your language" sign located throughout the job centers, to establish the language that needs translating.

3. At the customer's request, staff will utilize the CTS language link system.

4. If additional LEP services are needed (in person translation) the Full Employment Council will schedule and secure a translator within no more than 24 to 48 business hours at no cost to the customer.

III.   SELF ASSESSMENT PLAN

FEC has developed a self-assessment tool to identify language service needs, and evaluate the bilingual, translation, and interpretation resources already available to help LEP individuals' access agency programs and services. FEC Equal Opportunity Manager and Equal Opportunity Compliance Specialist along with the Planning Team will review annually the Self-Assessment Plan to assess and address the language needs in the service area and to ensure LEP individuals have access to programs and services. **(See attached attachment C)**

Attachment A

Missouri Division of Workforce Development Issuance No. 04-2021, Access to Meaningful Services for Individuals with Limited English Proficiency (LEP)

SUBJECT: Section 188 of WIOA Access to Meaningful Services for Individuals with Limited English Proficiency (LEP) Issuance

ATTACHMENTS:

1) The Language Assistance Planning Self-Assessment Tool for Recipients of Federal Financial Assistance
2) Missouri Workforce Services Language Access Plan

This Issuance is Official Policy of the Missouri Office of Workforce Development **ISSUING AUTHORITY:** *[signature]* Mardy Leathers, DMgt Director Office of Workforce Development (OWD)	**THIS ISSUANCE REQUIRES CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY** **KEYWORDS:** Limited English Proficiency (LEP), Access, Vital Information, Babel Notice, EO Data, Meaningful Access	**THIS ISSUANCE AFFECTS:** Missouri One-Stop Delivery System (MJCs/AJCs) WIOA Title I Performance/Accountability WIOA Title I One-Stop Delivery/Service Providers WIOA Title I Local Areas/Local Boards/Local Plans WIOA Title I In-State Funding WIOA Title I Performance/Accountability State of Missouri Workforce System Procedures **FOR THE ATTENTION OF:** DHEWD State Professional Staff Sub-recipient Staff Local Fiscal Agents One-Stop Operators Service Providers Local WDB Directors Local Compliance Monitors

RESCISSIONS:
OWD Issuance 06-2014, "Access to Meaningful Services for Individuals with Limited English Proficiency (LEP)" Policy, December 12, 2014.

REFERENCES:
U.S. Department of Labor 29 CFR Part 38; Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act 2014
Missouri Nondiscrimination Plan

Missouri Nondiscrimination Plan

SUMMARY:
The purpose of this issuance is to ensure WIOA recipients communicate effectively with individuals with limited English proficiency (LEP) by providing meaningful access to aids, benefits, services, or training under a WIOA Title I-financially assisted program or activity. This issuance is based on the following regulations and the Missouri Workforce Services Language Access Plan (Attachment 2):

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency,* was issued in 2000. This Order directs Federal agencies to work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Department of Justice (DOJ) Under DOJ regulations implementing Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. (Title VI), recipients of federal financial assistance have a responsibility to ensure meaningful access to their programs and activities by persons with limited English proficiency (LEP). See 28 CFR 42.104(b)(2).

Department of Labor (DOL) Civil Rights Center; Enforcement of Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Recipients. Issued May 29, 2003.

Workforce Innovation and Opportunity Act (WIOA) Nondiscrimination and Equal Opportunity and its implementing regulations. The Civil Rights Center (CRC), Department of Labor, is assigned monitoring and enforcement responsibilities for the nondiscrimination and equal opportunity provisions of WIOA. For details, view at Code of Federal Regulations 29 CFR Part 38.

BACKGROUND:
Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating based on national origin by, for example, failing to provide meaningful access to individuals who are LEP. Executive Order 13166 signed by the President in August 2000 and titled "Improving Access to Services for Persons with Limited English Proficiency" contains two major initiatives. The first initiative aims to better enforce and implement Title VI of the Civil Rights Act of 1964 by requiring federal agencies that provide federal financial assistance to develop guidance to clarify obligations for recipients of such assistance. The second initiative requires all federal agencies to meet the same standards as federal financial assistance recipients in providing meaningful access for LEP individuals to federally conducted programs.

No person shall be denied access to any WIOA program, activity, or service because they do not speak English or communicate in English on a limited basis.

SUBSTANCE:
This issuance is written to provide policy guidance specific to the Office of Workforce Development's (OWD) obligation to ensure individuals with LEP have meaningful access to all programs and services; and are able to participate effectively regardless of their ability to speak, read, write, or understand English. This policy guidance aligns with OWD's position by ensuring statewide consistency in language

service delivery; and further assures quality language services are available for individuals with LEP, enabling effective communication with workforce system staff.

Language Assistance Plan
Each WIOA recipient must develop and implement a Language Access Plan to address the LEP population in its service area. The Language Assistance Planning Self-Assessment Tool for Recipients of Federal Financial Assistance (Attachment 1) provides the framework for organizations to develop a comprehensive plan that supports Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)." This plan shall cover all programs or activities of recipients of federal financial assistance.

The LEP plan shall be:
- Distributed to all Missouri Job Centers staff and partner staff
- Accessible on OWD Main web site
- Posted for public review, although the text will be in English, the title, "Limited English Proficiency Plan," will be posted in customers' primary languages.
- Bilingual staff or interpreters will read the plan to customers upon request. Partner organizations can download the translations of the LEP Plan from the OWD Main web site.

Community Outreach and Disseminating Language Assistance Services Information
Missouri Job Center staff must inform all LEP customers of their right to timely and complimentary interpreter services. OWD has provided "Your Right to an Interpreter" posters for each workforce service to post in job centers and affiliate sites.

"I speak" cards
"I speak" cards say in both English and the primary languages, "I need a (the appropriate language) interpreter." Staff may distribute the cards to customers with LEP so they can present the "I speak" cards to signal their language and need for assistance. I speak cards can be downloaded from: https://www.dol.gov/sites/dolgov/files/OASAM/legacy/files/ISpeakCards.pdf.

Notice of Right to Language Assistance
OWD has provided a "Notice of Right to Language Assistance" statement that has been translated into 35 of the languages most commonly spoken in Missouri. The "Notice of Right to Language Assistance" poster is available online at: https://jobs.mo.gov/sites/jobs/files/your_right_to_an_interpreter_16x20.pdf. This notice statements inform LEP speakers of their right to an interpreter once they enter a Missouri Job Center setting.

Using an Interpreter or Translator
To provide effective services to LEP individuals, OWD and WIOA recipients will use competent interpreters. "Competency" requires that interpreters will have demonstrated proficiency in both English and the intended language; training that includes the skills and ethics of interpreting; fundamental knowledge in both languages of any specialized terms or concepts; and sensitivity to the customer's culture.

The Office of Administration maintains statewide master contracts with qualified vendors of spoken language interpreter services. The vendors offer in-person, videoconferencing, and telephone

interpreting. Availability and rates vary by vendor and the urgency of the request. To access the list of contracted vendors of spoken language interpreter services, visit the Office of Administration's Web site at: https://archive.oa.mo.gov/purch/contracts/.

Telephone Interpreter Service

The State of Missouri's Language Line Services provides telephone interpretation in over 240 languages, 24 hours a day, seven days a week. Staff should use Language Line Services when bilingual staff is not available, when the language is one not commonly encountered in Missouri, or when staff is not sure what language a customer speaks. Missouri Job Center staff should familiarize themselves with the Language Line Services interpreting process before they actually use it. For a demonstration, call Language Line Services at 855-295-9177or visit their Web site at: https://language.link/telephonic-interpretation/.

General Customer Service Requirements

1. Verify customer identity - before releasing case-specific information, job center staff must verify the identity of the customer. Bilingual staff, Language Line Services staff, or vendors providing interpretation or translation services through contracts with the state may assist job center staff in making verifications.
2. Document use of interpreter – job center staff must always document in the customer's case file or keep appropriate records when an interpreter is used or when a customer makes use of another form of language assistance. Accurate documentation is especially important for direct service staff.
3. Do not use minor children – job center staff must never use minor children as interpreters.
4. In-person interpreter services - if an interpreter is needed in-person, rather than over the telephone, staff will arrange to have an interpreter available at a time and place that is convenient for both the interpreter and the customer. Staff may arrange for in-person interpreting by contacting vendors directly.
5. Protection of confidentiality and accuracy of interpretation should always be of highest concern, particularly if the interview concerns topics that may negatively affect eligibility for services.
6. Always offer free interpreter services, as customer may not be aware of interpreter services.
7. If a customer prefers to have a family member or friend serve as an interpreter, ask if the customer will allow a trained interpreter to listen in to ensure accuracy of interpretation. If the offer is refused, document the offer and refusal and accommodate the customer's wishes.
8. Missouri Job Center contracted interpreters or bilingual staff should be used in circumstances when a customer is giving information that may negatively affect his/her eligibility for services, including deadlines or certifications.
9. Missouri Job Center contracted interpreters or bilingual staff are preferred in situations where a customer must answer complicated or detailed questions. If family or friends handle the interpreting, follow-up calls or letters should be done by bilingual staff, Language Line Services staff, or contractors.
10. Uncommon languages - when interpreter services are needed for a language not commonly spoken in Missouri, staff should coordinate with the Local EO Officer or the State EO Officer or use the other interpreter resources provided on the Office of Administration vendor service list at: https://archive.oa.mo.gov/purch/contracts/.

Utilizing Bilingual Staff

One of the primary ways that a bilingual job center staff can be used as part of a broader effort to ensure meaningful access is to have them conduct business with LEP job seekers directly in the job seeker's primary language.[1] Many individuals have some proficiency in more than one language, but are not completely bilingual. These individuals may be able to greet a limited English proficient individual in his or her language, but not provide job centers services in that language. The distinction is critical in order to ensure meaningful communication and appropriate allocation of resources. As valuable as bilingualism and ability to conduct monolingual communication in a language other than English can be, interpretation and translation require additional specific skills in addition to being fully fluent in two or more languages. A bilingual person can learn to become a translator or an interpreter, but is not automatically so qualified by virtue of his or her language abilities.[2]

Professional interpreters and translators are generally required to have undergone rigorous and specialized training. The job center services are very important and ensuring a job seekers has meaningful and effective access to aids, benefits and training is critical. WIOA recipients should evaluate the skill level and training of the bilingual job center staff, and the complexity of the communication, to determine whether the specialized skills of an interpreter or translator are required when providing services.[3]

Emergencies

When programs or the assistance requested requires immediate action, WIOA recipients must take the necessary to ensure that all customers, including customers with LEP, have access to services or information within the appropriate time frames. For example, when a customer needs an interpreter or other language assistance services to obtain expedited program services, OWD's goal is to make the services accessible within the required time frame, whether that means using an interpreter or any other appropriate type of language assistance.

Translating Requirements for Documents

Section 188 of WIOA defines vital information as information necessary for an individual to obtain any aid, benefit, service, and/or training; or required by law as whether written, oral or electronic. Examples of documents containing vital information include, but are not limited to:[4]
- applications;
- consent and complaint forms;
- notices of rights and responsibilities;
- notices advising LEP individuals of their rights under Section188 of WIOA, including the availability of free language assistance;
- rulebooks;
- written tests that do not assess English language competency, but rather assess competency for a particular license, job, or skill for which English proficiency is not required; and
- letters or notices that require a response from the beneficiary or applicant, participant, or employee.

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[4] 29 CFR 38.9 (e)(3)

Vital documents or information should be a priority for translation, particularly when the four-factor analysis reveals a need for these documents to be translated. Vital documents or information are those that are critical for accessing federally funded services or benefits or are documents required by law.

Babel notice means a short notice included in a document or electronic medium (*e.g.,* Web site, "app," email) in multiple languages informing the reader that the communication contains vital information, and explaining how to access language services to have the contents of the communication provided in other languages.[5] Babel Samples are found at: https://jobs.mo.gov/sites/jobs/files/babel-notice-samples-ui.pdf.

Forms and other documents shall be translated into any or all of the ten primary languages, as necessitated by the customer base, unless the translation of a certain document(s) would be burdensome enough to defeat the legitimate objectives of its program. OWD's primary languages include Spanish, Chinese, and German according to the Missouri Economic Research and Information Center (MERIC). For more information on languages spoken in Missouri can be found at: https://meric.mo.gov/data/many-languages-missouri. When analyzing the language participant data, the top languages accessed through Missouri Job Centers are Spanish, Somali, and Arabic.

OWD has made the documents and forms available at: https://jobs.mo.gov/dwdeo.

LEP Training Requirements for Staff
LWDBs must distribute an LEP Access Plan electronically and provide training and education so all staff will be aware of LEP policies and procedures. OWD will incorporate the LEP Access Plan information into the OWD new employee orientation program, and LEP training will include information on the following topics:
- OWD's legal obligation to provide language assistance
- The substance of OWD's LEP plan, including its policies and procedures for accessing language assistance services

All Missouri Job Center staff in ongoing public contact positions and management staff will be provided more in-depth training that includes:
- Tips on working with in-person and telephone interpreters,
- How to properly document information about a customer's language needs in the customer's case file or in WIOA recipient files where necessary,
- Best practices,
- Missouri Job Center staff contacts for information regarding LEP

All LEP training will be coordinated through the State and Local EO Officers.

LEP Data Requirements
Effective January 3, 2019, WIOA recipients must record the limited English proficiency and preferred language of each applicant, registrant, participant, and terminee. Such information must be stored in a manner that ensures confidentiality, and must be used only for the purposes of recordkeeping and reporting; determining eligibility, where appropriate, for WIOA Title I-financially assisted programs or

activities; determining the extent to which the recipient is operating its WIOA Title I-financially assisted program or activity in a nondiscriminatory manner; or other use authorized by law.[6]

ROLES, RESPONSIBILITES, and REQUIRED ACTIONS:
All Workforce System staff, local Workforce Development Boards, One-Stop operators, and other service providers must read, understand, and implement the information outlined in this policy.

TIMELINE:
Implementation of these rules .... **Immediate and Continuous**

INQUIRIES:
Please direct all questions or comments regarding this Issuance document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

For information about Missouri Office of Workforce Development services, contact a Missouri Job Center near you.
Locations and additional information are available at jobs.mo.gov or 1-(888)-728-JOBS (5627).
Missouri Department of Higher Education and Workforce Development is an equal opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities.
Missouri Relay Services at 711.

Attachment B

The Language Assistance Planning Self Assessment Tool

FEC Self-Assessment

Understanding How LEP Individuals Interact with Your Agency

The following series of questions helps agencies understand how an LEP individual may come into contact with your agency:

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with LEP individuals?	☐ Yes	☐ No
2. Please describe the manner in which your agency interacts with the public or LEP individuals:	☐ In-Person ☐ Telephonically ☐ Electronically (e.g. email or website)	☐ Via Correspondence ☐ Other: (please specify)
3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, and use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.)	☐ Yes	☐ No

4. If your agency does provide federal financial assistance to non-federal entities:
  a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?
  b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services?
  c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?
	Yes
	
	a. Yes
	
	b. Yes
	
	c. Yes
		No
		
		a. No
		
		b. No
		
		c. No

Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your agency identify LEP individuals? (Select all that apply)	☐ Assume limited English proficiency if communication seems impaired ☐ Respond to individual requests for language assistance services ☐ Self-identification by the non-English speaker or LEP individual ☐ Ask open-ended questions to determine language proficiency on the telephone or in person ☐ Use of "I Speak" language identification cards or posters	Based on written material submitted to the agency (e.g. complaints) ☐ We have not identified non-English speakers or LEP individuals Other (Please specify): _____
2. Does your program have a process to collect data on:	Yes	No
a. The number of LEP individuals that you serve?	Yes	a. No
b. The number of LEP individuals in your service area?	Yes	b. No
c. The number and prevalence of languages spoken by LEP individuals in your service area?	Yes	c. No
3. How often does your agency assess the language data for your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____

4. What data does your agency use to determine the LEP communities in your service area? (Select all that apply)	☐ Census ☐ US Dept. of Education ☐ US Dept. of Labor ☐ State Agencies	☐ Community Organizations ☐ Intake Information ☐ Other:_____
5. Do you collect and record primary language data from individuals when they first contact your programs and activities?	Yes	No
6. If you collect and record primary language Data, where is the information stored?		
7. What is the total number of LEP individuals who use or receive services from your program each year?		
8. How many LEP individuals attempt to access your programs or services each month?		
9. How many LEP individuals use your programs or services each month?		
10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).	Language 1. 2. 3. 4. 5. 6.	Frequency of Encounters 1. 2. 3. 4. 5. 6.

Providing Language Assistance Services

The following set of questions will help you assess how well your agency is providing language assistance services to LEP individuals:

1. Does your agency currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?	Yes	No
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)	☐ Primary language of persons encountered or served ☐ Use of language assistance services such as interpreters and translators ☐ Funds or staff time spent on language assistance services	☐ Number of bilingual staff ☐ Cost of interpreter services ☐ Cost of translation of materials into non-English languages ☐ Other (Please specify):_____

3. Does your agency have a system to track the cost of language assistance services?	Yes	No
4. What types of language assistance services does your agency provide? (Select all that apply)	☐ Bilingual staff ☐ In-house interpreters (oral) ☐ In-house translators (documents) ☐ Contracted interpreters ☐ Contracted translators ☐ Telephone interpretation services ☐ Video interpretation services	☐ Language bank or dedicated pool of interpreters or translators ☐ Volunteer interpreters or translators ☐ Interpreters or translators borrowed from another agency ☐ Other (Please specify): _____
5. Does your agency a) have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals? b) Does the process include use of standardized language proficiency exams?	a) Yes b) Yes	a) No b) No
6. Does your agency ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret?	Yes	No
7. Does your agency have contracts with language assistance service providers (in person interpreters, telephone interpreters, video interpreters, or translators)?	Yes	No
8. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?	Yes	No
9. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area?	Yes	No
10. Which vital written documents has your agency translated into non-English languages?	☐ Consent forms ☐ Complaint forms ☐ Intake forms ☐ Notices of rights ☐ Notice of denial, loss or decrease in benefits or services ☐ Notice of disciplinary action	☐ Applications to participate in programs or activities or to receive benefits or services ☐ Other (please specify): _____

11. Does your agency translate signs or posters announcing the availability of language assistance services?	Yes	No
12. When your agency updates information on its website, does it also add that content in non-English languages?	Yes	No

Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals?	Yes	No
2. Who receives staff training on working with LEP individuals? (Select all that apply)	☐ Management or senior staff ☐ Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals	☐ Bilingual Staff ☐ New employees ☐ All employees ☐ Volunteers ☐ Others (Please specify): _____ ☐ None of the above
3. Are language access policies and LEP issues included in the mandatory training curriculum for staff?	Yes	No
4. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals?	Yes	No
5. Does staff receive periodic training on how to obtain and work with interpreters?	Yes	No
6. Does staff receive periodic training on how to request the translation of written documents into other languages?	Yes	No
7. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?	Yes	No

8. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?	Yes	No

Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)	☐ Frontline and outreach multilingual staff ☐ Posters in public areas ☐ "I Speak" language identification cards distributed to frontline staff ☐ Website	☐ Social networking website (e.g. Facebook, Twitter) ☐ E-mail to individuals ☐ Other (Please specify): _____ ☐ None of the above
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services?	Yes	No
3. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)?	Yes	No
4. Does your agency inform community groups about the availability of free language assistance services for LEP individuals?	Yes	No
5. Does your agency inform current applicants or recipients about the availability of language assistance services?	Yes	No
6. Does the main page of your agency website include non-English information that would be easily accessible to LEP individuals?	Yes	No
7. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services?	Yes	No

Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your agency have a written language access policy?	Yes	No
2. If so, is a description of this policy available to the public?	Yes	No
3. How often is your agency's language access policy reviewed and updated?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____
4. When was the last time your agency's language access policy was updated?	Month_____	Year_____
5. How often does your agency update its data on the LEP communities in your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____
6. Does your agency have a language access coordinator?	Yes	No
7. Does your agency have a formal language access complaint process?	Yes	No
8. Has your agency received any complaints because it did not provide language assistance services?	Yes	No
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?	Yes	No
10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?	Yes	No

Attachment A

Missouri Division of Workforce Development Issuance No. 04-2021, Access to Meaningful Services for Individuals with Limited English Proficiency (LEP)

Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs

Federal Coordination and Compliance Section
Civil Rights Division
U.S. Department of Justice

May 2011

"Whether in an emergency or in the course of routine business matters, the success of government efforts to effectively communicate with members of the public depends on the widespread and nondiscriminatory availability of accurate, timely, and vital information."

- Attorney General Eric Holder, Memorandum to All Federal Agencies Regarding Executive Order 13166, February 17, 2011

Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs

I. Overview

The goal of all language access planning and implementation is to ensure that your agency communicates effectively with limited English proficient (LEP) individuals.[1] As the Attorney General notes in his Memorandum to all Federal Agencies Regarding the Federal Government's Renewed Commitment to Language Access Obligations Under Executive Order 13166, this requires ensuring effective communication at all points of contact between an LEP person and your agency.[2] While each agency's approach to overcoming language barriers may differ depending on a variety of factors, a useful model for providing meaningful access to LEP individuals often includes:

A. Conducting a self-assessment to determine what types of contact your agency has with the LEP population.

The self-assessment identifies language service needs, and evaluates the bilingual, translation, and interpretation resources already available to help LEP individuals access your agency's benefits, programs, services, information, or other operations. (Part II B, below).

B. Developing language access policy directives, implementation plan, and procedures.

1. **Language Access Policy Directives-** Policy directives set forth standards, operating principles, and guidelines that govern the delivery of language appropriate services. Policy directives may come in different forms but are designed to require the agency and its staff to ensure meaningful access. Policy directives should be made publicly available.

2. **Language Access Implementation Plan-** The plan is a management document that outlines how the agency defines tasks, sets deadlines and priorities, assigns responsibility, and allocates the resources necessary to come into or maintain compliance with language access requirements. It describes how the agency will meet the service delivery standards

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[1] See Exec. Order No. 13166, 65 Fed Reg. 50,121 (Aug. 11, 2000), http://www.lep.gov/13166/eolep.pdf.

[2] See Attorney General Holder Memorandum to All Federal Agencies Regarding the Federal Government's Renewed Commitment to Language Access Obligations Under Executive Order 13166 (February 17, 2011), http://www.lep.gov/13166/AG_021711_EO_13166_Memo_to_Agencies_with_Supplement.pdf.

delineated in the policy directives, including the manner by which it will address the language service and resource needs identified in the self-assessment. The plan is a roadmap that helps agencies: navigate the process of setting deadlines and priorities, and identifying responsible personnel for policy and procedures development; hire, contract, assess, and ensure quality control of language assistance services (oral and written); provide notice of language assistance services; provide staff training; and conduct ongoing monitoring and evaluation.

3. **Language Access Procedures**- Procedures are the "how to" for staff. They specify for staff the steps to follow to provide language services, gather data, and deliver services to LEP individuals. Procedures can be set forth in handbooks, intranet sites, desk references, reminders at counters, notations on telephone references, and the like.

Part II will help you assess how your agency currently provides language assistance services to LEP individuals, using the Sample Self Assessment included in Part II B. Part III provides a framework for developing appropriate language access policy directives, plan, and procedures.

C. Scope

The obligations of Executive Order 13166 apply to all federal conducted and assisted programs. In his Memorandum for Heads of Federal Agencies regarding the Federal Government's Renewed Commitment to Language Access Obligations Under Executive Order 13166, the Attorney General directed federal agencies that provide federal financial assistance to draft LEP guidance for agencies that are recipients of federal financial assistance (recipients). The term federal financial assistance includes, but is not limited to, grants and loans of federal funds; grants or donations of federal property; training; details of federal personnel; or any agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

All agencies providing federal financial assistance directly or indirectly should obtain information and maintain records that ensure that they can determine which entities have received such assistance, including a list of sub-grantees, and for what purpose the assistance has been provided. When any agency provides federal financial assistance it must ensure that recipients acknowledge and agree that they will comply (and require any sub-grantees, contractors, successors, transferees, and assignees to comply) with applicable provisions of federal civil rights laws and policies prohibiting discrimination, including but not limited to Title VI of the Civil Rights Act of 1964, which prohibits recipients from discriminating on the basis of race, color, or national origin, including limited English proficiency. See 42 U.S.C. 2000d et seq. Model assurance language addressing national laws and policies prohibiting discrimination can be found at http://www.justice.gov/crt/about/cor/draft_assurance_language.pdf. Agencies must require recipients to obtain these assurances from their sub-recipients and must maintain systems that can record and track the recipient's agreement with these assurances. See 28 C.F.R. §42.105.

II. SELF-ASSESSMENT AND CONSIDERATIONS FOR YOUR PLAN

An assessment can help an agency determine if it communicates effectively with LEP individuals and can inform language access program planning. The questions in Part II B. (starting on page 8) may be used by federal agencies and recipients to conduct a self-assessment of their progress in providing language assistance services to LEP persons. Divided into six sections, the self-assessment approximates the elements that are part of effective language access policy directives and implementation plans: (1) understanding how LEP individuals interact with your agency; (2) identifying and assessing LEP communities; (3) providing language assistance services; (4) training staff on policies and procedures; (5) providing notice of language assistance services; and (6) monitoring, evaluating, and updating the language access policy directives, plans, and procedures.[3] The tool is a starting point; agencies should add or modify as appropriate for their programs and activities.

A. Guidance Regarding Self-Assessments

Provided below are additional guidance and considerations for each of these six elements. While the order may differ, your agency should consider each of these elements as it develops its plan. The sample self-assessment questionnaire is available at Part II B.

1. Understanding How LEP Individuals Interact with Your Agency

A federally conducted or funded program could interact with LEP individuals in a variety of ways. Any interaction with the public has the potential to interact with LEP individuals. These could include, but are not limited to, program applicants and participants; hotline or information line calls; outreach programs; public meetings and hearings; public access to agency websites; written materials or complaints sent to an agency; agency brochures intended for public distribution; contacts with potential witnesses, victims, defendants; and interactions with detainees and prisoners. It is important for agencies to also examine the manner in which the agency interacts with the public and/or LEP individuals (e.g. in-person consultations versus

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[3] See Department of Justice, *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, 67 FR 41464-65 (June 18, 2002). (hereinafter "2002 DOJ Guidance"), http://www.justice.gov/crt/about/cor/lep/DOJFinLEPFRJun182002.pdf.

correspondence) as this can dictate the type of language assistance services provided by the agency.

2. Identification and Assessment of LEP Communities

A federally conducted or funded program should consider assessing the number or proportion of LEP persons from each language group in its service area to determine appropriate language assistance services. This analysis includes persons in a geographic service area with whom your agency comes into contact while carrying out agency functions. For the assessment to be accurate it must also include all communities who are eligible for services or are likely directly affected by programs or activities. Agencies may determine the linguistic characteristics of an LEP population in a service area by reviewing available data from federal, state, and local government agencies, community, and faith based organizations:

> **REMINDER:** Your primary goal is to effectively communicate with LEP individuals. The order in which each element is achieved may differ from agency to agency. While it may be helpful to identify and assess your LEP communities before providing language assistance services, this should not stand in the way of providing meaningful access to LEP individuals.

- Federal Agencies.

    - The *U.S. Census Bureau* through its *American Community Survey (ACS)* maintains statistics on the linguistic composition of LEP individuals in your service area: http://www.census.gov/hhes/socdemo/language/data/index.html. Beginning with the 2010 Census, the Census Bureau stopped collecting decennial census data on language use and English-speaking ability. Language data continues to be gathered on an annual basis by the ACS and can be found on the American FactFinder website, www.factfinder.census.gov. The Census Bureau has also created a website explaining how to use the ACS language data it collects: http://www.census.gov/hhes/socdemo/language/index.html.

    - *The U.S. Department of Education* maintains a Civil Rights Data Collection, http://ocrdata.ed.gov/, which has information from the nation's school districts including student enrollment and educational programs and services disaggregated by race, ethnicity, sex, limited English proficiency, and disability. The National Center for Education Statistics, http://nces.ed.gov/fastfacts/display.asp?id=96, has information on children who speak a language other than English at home.

    - *The Federal Interagency Working Group on Limited English Proficiency Website* also has demographic information available at http://www.lep.gov/demog_data.html

- State and local government agencies.
    - State social service agencies, state departments of education, local social service agencies, and school districts often gather and report information on LEP populations.

- Local community-based and religious organizations.

- Consider consulting organizations that serve and work with LEP communities to get an accurate assessment of the existing and emerging LEP communities in your service area.

An agency should also consider identifying and tracking the primary language of LEP individuals that seek and receive programs and services. This can be accomplished by determining the points of contact between agency staff and LEP individuals. Agencies may create mandatory data fields for LEP, languages spoken and the preferred language for written communication to ensure that all staff collect and input this information. By regularly collecting and updating this data, agencies will be able to accurately identify and efficiently address the changing needs of their LEP communities.

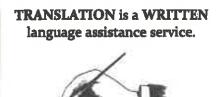### 3. Providing Language Assistance Services

Effective communication with LEP individuals requires your agency to have language assistances services in place. There are two primary types of language assistance services: oral and written. Oral language assistance service may come in the form of "in-language" communication (a demonstrably qualified bilingual staff member communicating directly in an LEP person's language) or interpreting.

An interpreter renders a message spoken in one language into one or more other languages. Interpretation can take place in-person, through a telephonic interpreter, or via internet or video interpreting. An interpreter must be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the LEP individual. Depending upon the circumstances, interpreters may

INTERPRETATION is an ORAL language assistance service.

provide simultaneous interpretation of proceedings so that an LEP person understands what is happening in that proceeding, or may interpret an interview or conversation with an LEP person in the consecutive mode. Interpreter competency requires more than self-identification as bilingual. Agencies should avoid using family members, children, friends, and untrained volunteers as interpreters because it is difficult to ensure that they interpret accurately and lack ethical conflicts.

TRANSLATION is a WRITTEN language assistance service.

Translation is the replacement of written text from one language into another. A translator also must be qualified and trained. Federal agencies and recipients may need to identify and translate vital documents to ensure LEP individuals have meaningful access to important written information. Vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; notice of disciplinary action; signs; and notices advising LEP individuals of free language assistance services. Agencies should proactively translate vital written documents into the frequently encountered languages of LEP groups

eligible to be served or likely to be affected by the benefit, program or service. When agency personnel have reason to believe that an individual is LEP, the agency must respond to that LEP individual in a language he or she understands. For example, a letter sent to a specific LEP person should be translated into the appropriate language for that individual to ensure effective communication. Agencies should also put processes in place for handling written communication with LEP individuals in less frequently encountered languages.

4. Training of Staff on Policies and Procedures

Staff will not be able to provide meaningful access to LEP individuals if they do not receive training on language access policies and procedures, including how to access language assistance services. This training should be mandatory for staff who have the potential to interact or communicate with LEP individuals, staff whose job it is to arrange for language assistance services, and managers. Training should explain how staff can identify the language needs of an LEP individual, access and provide the necessary language assistance services, work with interpreters, request document translations, and track the use of language assistance services. Bilingual staff members who communicate "in-language" to LEP individuals, or who serve as interpreters or translators, should be assessed and receive regular training on proper interpreting and translation techniques, ethics, specialized terminology, and other topics as needed. Without periodic assessment and training, bilingual staff may not be able to provide the language assistance services necessary to ensure LEP individuals have meaningful access to your agency's programs.

5. Providing Notice of Language Assistance Services

Federal agencies and recipients must inform LEP individuals of their eligibility for benefits, programs, and services in a language they understand. Agencies should assess all points of contact, telephone, in-person, mail, and electronic communication its staff has with the public and LEP individuals when determining the best method of providing notice of language assistance services. An agency should not only translate its outreach materials, but also explain how LEP individuals may access available language assistance services. Methods used to inform LEP individuals about language assistance services may include translating outreach materials into other languages, updating non-English content in key languages on the main page of the program website, and providing public service messages in non-English media describing your programs.

Current applicants or beneficiaries of your programs or services should also receive notice and information about available language assistance services. This may be accomplished through the use of effective, program specific notices such as forms, brochures, language access posters placed in conspicuous locations describing in multiple languages the availability of language assistance services, the use of "I Speak" language identification cards[4], and by including instructions in non-English languages on telephone menus.

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[4] An example of an "I Speak" card can be found at www.justice.gov/crt/lep/resources/OhioLangIDcard.pdf .

6. **Monitoring, Evaluating, and Updating the Language Access Policy Directives, Plans, and Procedures**

For a language access program to continue to be effective, an agency must periodically monitor, evaluate, and update the plan, policies and procedures. Some federal agencies and recipients may designate a committee or staff person to be the language access coordinator responsible for monitoring, evaluating, and updating the language access program. Federal law does not prescribe a particular program model or evaluation approach. Consequently, the approach to and design of an effective language access evaluation may vary for each agency and recipient. Monitoring the effectiveness of your program may include:

- Surveying staff on how often they use language assistance services, if they believe there should be changes in the way services are provided or the providers that are used, and if they believe that the language assistance services in place are meeting the needs of the LEP communities in the service area.
- Conducting customer satisfaction surveys of LEP applicants and beneficiaries based on their actual experience of accessing the agency's benefits, programs, information, or services.
- Observing and evaluating agency interactions with LEP individuals.
- Soliciting feedback from community-based organizations and other stakeholders about the agency's effectiveness and performance in ensuring meaningful access for LEP individuals.
- Keeping current on community demographics and needs by engaging school districts, faith communities, refugee resettlement agencies, and other local resources.
- Considering new resources including funding, collaborations with other agencies, human resources, emerging technology, and other mechanisms for ensuring improved access for LEP individuals.
- Monitoring your agency's response rate to complaints or suggestions by LEP individuals, community members, and employees regarding language assistance services provided.

Creating a record of language assistance services can help inform programs whether there should be changes to the quantity or type of language assistance services. The monitoring and review of current policies and the types of language assistance services provided should occur on an annual basis.

B. A Sample Self-Assessment

1. Understanding How LEP Individuals Interact with Your Agency

The following series of questions helps agencies understand how an LEP individual may come into contact with your agency:

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with LEP individuals?	☐ Yes	☐ No
2. Please describe the manner in which your agency interacts with the public or LEP individuals:	☐ In-Person ☐ Telephonically ☐ Electronically (e.g. email or website)	☐ Via Correspondence ☐ Other: (please specify)
3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.)	☐ Yes	☐ No

4. If your agency does provide federal financial assistance to non-federal entities:
   a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?
   b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services?
   c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?
	Yes
	
	a. Yes
	
	b. Yes
	
	c. Yes
		No
		
		a. No
		
		b. No
		
		c. No

2. Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your agency identify LEP individuals? (Select all that apply)	☐ Assume limited English proficiency if communication seems impaired ☐ Respond to individual requests for language assistance services ☐ Self-identification by the non-English speaker or LEP individual ☐ Ask open-ended questions to determine language proficiency on the telephone or in person ☐ Use of "I Speak" language identification cards or posters	☐ Based on written material submitted to the agency (e.g. complaints) ☐ We have not identified non-English speakers or LEP individuals ☐ Other (Please specify): _____

2. Does your program have a process to collect data on:
  a. The number of LEP individuals that you serve?
  b. The number of LEP individuals in your service area?
  c. The number and prevalence of languages spoken by LEP individuals in your service area?
	Yes
	a. Yes
	b. Yes
	c. Yes
		No
		a. No
		b. No
		c. No

3. How often does your agency assess the language data for your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:
4. What data does your agency use to determine the LEP communities in your service area? (Select all that apply)	☐ Census ☐ US Dept. of Education ☐ US Dept. of Labor ☐ State Agencies	☐ Community Organizations ☐ Intake information ☐ Other: _____
5. Do you collect and record primary language data from individuals when they first contact your programs and activities?	Yes	No
6. If you collect and record primary language		

data, where is the information stored?		
7. What is the total number of LEP individuals who use or receive services from your program each year?		
8. How many LEP individuals attempt to access your programs or services each month?		
9. How many LEP individuals use your programs or services each month?		
10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).	Language 1. 2. 3. 4. 5. 6.	Frequency of Encounters 1. 2. 3. 4. 5. 6.

3. Providing Language Assistance Services

The following set of questions will help you assess how well your agency is providing language assistance services to LEP individuals:

1. Does your agency currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?	Yes	No
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)	☐ Primary language of persons encountered or served ☐ Use of language assistance services such as interpreters and translators ☐ Funds or staff time spent on language assistance services	☐ Number of bilingual staff ☐ Cost of interpreter services ☐ Cost of translation of materials into non-English languages ☐ Other (Please specify): _____
3. Does your agency have a system to track the cost of language assistance services?	Yes	No
4. What types of language assistance services does your agency provide? (Select all that apply)	☐ Bilingual staff ☐ In-house interpreters (oral) ☐ In-house translators (documents) ☐ Contracted interpreters ☐ Contracted	☐ Language bank or dedicated pool of interpreters or translators ☐ Volunteer interpreters or translators ☐ Interpreters or

	translators ☐ Telephone interpretation services ☐ Video interpretation services	translators borrowed from another agency ☐ Other (Please specify):
5. Does your agency a) have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals? b) Does the process include use of standardized language proficiency exams?	a) Yes b) Yes	a) No b) No
6. Does your agency ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret?	Yes	No
7. Does your agency have contracts with language assistance service providers (in-person interpreters, telephone interpreters, video interpreters, or translators)?	Yes	No
8. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?	Yes	No
9. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area?	Yes	No
10. Which vital written documents has your agency translated into non-English languages?	☐ Consent forms ☐ Complaint forms ☐ Intake forms ☐ Notices of rights ☐ Notice of denial, loss or decrease in benefits or services ☐ Notice of disciplinary action	☐ Applications to participate in programs or activities or to receive benefits or services ☐ Other (please specify):
11. Does your agency translate signs or posters announcing the availability of language assistance services?	Yes	No
12. When your agency updates information on its website, does it also add that content in non-English languages?	Yes	No

4. Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1.	Does all agency staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals?	Yes	No
2.	Who receives staff training on working with LEP individuals? (Select all that apply)	☐ Management or senior staff ☐ Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals	☐ Bilingual Staff ☐ New employees ☐ All employees ☐ Volunteers ☐ Others (Please specify): _____ ☐ None of the above
3.	Are language access policies and LEP issues included in the mandatory training curriculum for staff?	Yes	No
4.	Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals?	Yes	No
5.	Does staff receive periodic training on how to obtain and work with interpreters?	Yes	No
6.	Does staff receive periodic training on how to request the translation of written documents into other languages?	Yes	No
7.	Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?	Yes	No
8.	Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?	Yes	No

5. Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)	☐ Frontline and outreach multilingual staff ☐ Posters in public areas ☐ "I Speak" language identification cards distributed to frontline staff ☐ Website	☐ Social networking website (e.g. Facebook, Twitter) ☐ E-mail to individuals or a list serv ☐ Other (Please specify): _____ ☐ None of the above
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services?	Yes	No
3. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)?	Yes	No
4. Does your agency inform community groups about the availability of free language assistance services for LEP individuals?	Yes	No
5. Does your agency inform current applicants or recipients about the availability of language assistance services?	Yes	No
6. Does the main page of your agency website include non-English information that would be easily accessible to LEP individuals?	Yes	No
7. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services?	Yes	No

6. Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your agency have a written language access policy?	Yes	No
2. If so, is a description of this policy available to the public?	Yes	No
3. How often is your agency's language access policy reviewed and updated?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:

4.	When was the last time your agency's language access policy was updated?	Month	Year
5.	How often does your agency update its data on the LEP communities in your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:
6.	Does your agency have a language access coordinator?	Yes	No
7.	Does your agency have a formal language access complaint process?	Yes	No
8.	Has your agency received any complaints because it did not provide language assistance services?	Yes	No
9.	Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?	Yes	No
10.	Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?	Yes	No

III.   DEVELOPING LANGUAGE ACCESS DIRECTIVES, PLANS, AND PROCEDURES

This section will provide federal agencies and organizations, as well as agencies that receive federal financial assistance (recipients), with a framework to develop, modify, and implement language access policy directives, plans, and procedures. This framework should help agencies plan their organizational approach to providing language assistance services when an LEP individual seeks or encounters an agency contact. Language access policy directives, plans, and procedures will differ depending on a variety of factors including the nature or method of operation of the agency and its points of contact with the public. Some steps that are reasonable for an agency that serves a few LEP persons in a year may be different than those expected from an agency that serves several LEP persons each day. Accordingly, we recommend tailoring this framework to your agency's mission, the population served (both their language needs and the cultural context), the importance of the service provided by the program, and the available resources.

Many federal agencies and recipients have found that it is useful, when developing or revising their language access program, to establish a work group that includes administrators, professional and administrative support staff, potential beneficiaries, and members of community organizations. By working with a diverse group that includes stakeholders, you will receive more comprehensive input from those whose support and efforts may be important to the success of your language access policy directives, plan, and procedures. Inclusive approaches in plan design and development also tend to promote overall community awareness and support. By leveraging personnel from different departments, an agency is able to build institutional knowledge and resources that will lead to long-term policy coherence and consistency. In addition, these individuals will be valuable resources to draw upon during evaluation and improvement activities.

A. Components of a Language Access Program

While we describe language access policy directives, plans, and procedures as three distinct concepts, you may notice significant overlap between the three areas as you begin to develop your agency's language access program. We have provided the framework below to help you conceptualize the task ahead and provide you with a model flexible enough to tailor to your agency's particular needs.

1. **Language Access Policy Directives.** A policy directive sets forth standards, operating principles, and guidelines that will govern the delivery of language appropriate services. Policy directives may be in the form of a public directive, order, rule, regulation, guidance,

or other policy document. The purpose and authority for a policy directive may come from federal, state, or local laws, orders, or ordinances. A policy directive often includes the following components:

> **Example General Policy Statement:**
> *"It is the policy of this agency to provide timely meaningful access for LEP persons to all agency programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that the agency will provide these services to them."*

a. *A General Policy Statement.* This section explains the goals and expectations of the agency in terms that bind the agency and its employees.

b. *Purpose and Authority.* This section provides the legal basis or administrative authority for the agency policy and may explain the nexus between the policy directives and the agency's mission. For example:

"The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for agency personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to the success of our mission to [insert]."

c. *Language Assistance Measures.* This section sets forth the standards for language assistance services to be provided to LEP individuals. Language assistance measures should be written in a manner that requires staff compliance consistent with the agency's culture. The measures define acceptable methods of communication with LEP persons and may further elaborate requirements such as those for data gathering and recording, notice, and training. In the sample general policy statement, the decree that all personnel "shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services" describes the standards for how and when the agency must communicate with LEP persons.

d. *Staff Compliance.* This section describes the responsibility of each division, unit, or staff member. For example, the sample general policy statement above denotes that "all personnel" are required to provide free language assistance services to LEP individuals and must inform the public about available language assistance services.

e. *Definitions.* A policy directive may also explain any terms referenced in the policy. These terms may include agency-specific classifications of bilingual staff, interpreter, language assistance services, LEP, primary language, translation, vital documents, etc.

Additional Language Access Policy Directives. An agency may have more than one policy directive. For example, an agency may have a policy directive that explains its overall obligation to provide services to LEP individuals and secondary or topical policy directives that support the agency's overarching LEP goals and objectives. Additional policy directives may include formal guidelines that describe the agency's rules and regulations, for example:

- *Staff Training.* A policy directive on staff training may dictate the frequency, curriculum, and target personnel for ongoing training. For example, this policy directive may mandate training particular to management, interpreters, translators, or frontline staff who encounter LEP individuals.

- *Bilingual Staff.* A policy directive on bilingual staff may state a policy that second language skills are a desired characteristic, prescribe the hiring process for bilingual staff, provide the mechanism for designating jobs as bilingual, when and how to test the competency of prospective or current bilingual staff, define which staff are "bilingual," and/or additional remuneration for bilingual staff.

- *Performance Measurement.* A policy directive on performance measurement may order the frequency and manner of monitoring and oversight. For example, an agency may elect to conduct an audit of language assistance services on an annual basis.

2. **A Language Access Plan.** The plan is a management tool that provides an administrative blueprint for bringing the agency into compliance with language

Language Access Assessment and Planning Tool

access requirements. The plan describes how the agency will implement the standards for service delivery delineated in the policy directives, including explaining how the agency will increase its capacity to address the language service and resource needs identified in the self-assessment. The plan is a roadmap that helps agencies: navigate the process of setting deadlines, priorities, and identifying responsible personnel for policy and procedures development; hire, contract, assess, and ensure quality control of language assistance services (oral and written); provide notice of language assistance services; provide training of staff; and conduct ongoing monitoring and evaluation. Key components of a language access plan include:

a. *Identification of persons charged with implementing the plan.* A plan should describe the management staff, workgroup, committee, or other agency staff who will be responsible for creating and overseeing the policy directives, developing and modifying the language access plan, and establishing and implementing operational procedures. The plan should also detail the chains of command for authority and oversight and explain any coextensive responsibility and coordination with other agencies, divisions, and offices.

b. *Identification and assessment of LEP communities.* A plan should address what resources will be needed to assess the number or proportion of eligible LEP persons from each language group in an agency service area and the resources that will be needed to provide language assistance services. The plan should also outline the work needed to install or maintain systems for data collection and management.

c. *A description of the timeframe, objectives, and benchmarks for work to be undertaken.*

d. *Identification of funding and procurement issues and the steps needed to address them.*

e. *Notice of language assistance services.* A plan should also describe how the agency intends to implement the changes needed to inform LEP individuals of the benefits, programs, and services for which they may be eligible and the available language assistance services.

f. *Training staff on policies and procedures.* A plan will identify training needs and explain how they will be addressed.

g. *Monitoring and updating the plan, policies, and procedures.* A plan will explain the agency's approach to monitoring how it provides services to LEP individuals, how it monitors plan performance, and the process for reviewing, and, if appropriate, modifying current language access plans, policies, and procedures.

h. *Collaborating with LEP communities and other stakeholders.* Organizations that have significant contact with LEP persons, such as schools, religious

organizations, community groups, and groups working with new immigrants can be very helpful in linking LEP persons to an agency's programs and its language assistance services. The plan can include provisions for creating and conducting outreach and the actions needed to implement an effective system to gather feedback and involve outside entities or individuals in the review process.

3. **Language Access Procedures.** Procedures are detailed explanations that specify the steps to be followed to provide language assistance services, gather data, and deliver services to LEP individuals. Procedures can be set forth in handbooks, intranet sites, desk references, and reminders at counters. Procedures may entail use of forms or software. Language access procedures often explain the following:

- How staff are to respond to telephone calls from LEP individuals.
- How staff together, track, and record language preference information.
- How staff inform LEP individuals about available language assistance services.
- How staff will identify the language needs of LEP individuals.
- How staff are to respond to correspondence (letters and email) from LEP individuals.
- How staff will procure in-person interpreter services.
- How staff will access telephone or video interpreter services.
- How to use bilingual staff for LEP services and which staff are authorized to provide in-language service.
- How to obtain translations of documents.
- How staff will process language access complaints.

B. Appointing a Language Access Coordinator or Other Responsible Personnel

Some agencies have found it helpful to appoint a language access coordinator and other responsible personnel. These individuals are responsible for devising and ensuring that the agency adheres to its language access policy directives, plan and procedures to provide meaningful access to LEP persons. The language access coordinator should be or report to a high-ranking official within the agency since high level support is essential to successful implementation. The coordinator is responsible for language assistance services and may delegate duties but should retain responsibility for oversight, performance, and implementation of the language access plan. Agencies with multiple offices and divisions may find that each component or field office should designate an individual as a local language access coordinator. The language access plan should set forth the name and contact information of the responsible official(s). The language access coordinator should consider creating a working group of key stakeholders to assist in creating and implementing language access procedures for the agency.

The language access coordinator may also oversee personnel and performance of employee and non-employee interpreters and translators, including:

- Identifying qualified interpreters and translators to be included in an interpreter database;

- Creating interpreter, translator, and bilingual staff qualifications and ethical standards;
- Outlining measures to ensure quality control of interpreters and translators;
- Training and testing bilingual individuals including staff who provide language assistance services;
- Assigning qualified interpreters, translators and bilingual employees to perform language assistance functions;
- Maintaining a regularly updated list of all competent bilingual employees, contract interpreters, and contract translators that includes their availability, non-English language(s) spoken, and contact information;
- Changing hiring and personnel practices to increase staff language capacity (e.g., providing pay incentives for bilingual employees);
- Developing a procurement strategy for contract language assistance services providers;
- Searching for funding and other resources to support interpretation and translation; technological and other infrastructural support, and staffing;
- Providing input in budgetary and procurement matters related to implementation of the language access policy, plan, and procedures; and
- Coordinating procurement for interpreter and translator compensation for services rendered.

C. Community Outreach and Disseminating Language Assistance Services Information

When language assistance services are not readily available at a given agency, LEP individuals will be less likely to participate in or benefit from its programs and services. As a result, many LEP persons may not seek out agency benefits, programs, and services; may not provide beneficial information or file complaints; and may not have access to critical information provided by your agency because of limited access to language assistance services. Thus, self-assessments of the number of current LEP contacts may significantly underestimate the need for language services. Agencies should make every effort to conduct effective outreach, including:

- Providing information to the public and to LEP communities regarding the language assistance services available free of charge. Information should be provided in English and in the appropriate other languages using, for example, signage, websites, translated documents, telephone tree options, kiosks, and community-focused outreach;
- Coordinating with other agencies and stakeholders to ensure consistent identification of LEP status, primary language, and similar information; and
- Exchanging promising practices and challenges with other governmental and non-governmental agencies.

The Federal Interagency Working Group on Limited English Proficiency welcomes and encourages your comments regarding this tool. To provide written comments, please write:

The Federal Interagency Working Group on LEP
C/O Federal Coordination and Compliance Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave., NWB
Washington, DC 20530

Attachment D

FEC Self-Assessment

FEC Self-Assessment

Understanding How LEP Individuals Interact with Your Agency

The following series of questions helps agencies understand how an LEP individual may come into contact with your agency:

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with LEP individuals?	☐ Yes	☐ No
2. Please describe the manner in which your agency interacts with the public or LEP individuals:	☐ In-Person ☐ Telephonically ☐ Electronically (e.g. email or website)	☐ Via Correspondence ☐ Other: (please specify)
3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, and use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.)	☐ Yes	☐ No

4. If your agency does provide federal financial assistance to non-federal entities:
  a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?
  b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services?
  c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?
	Yes
	
	a. Yes
	
	b. Yes
	
	c. Yes
		No
		
		a. No
		
		b. No
		
		c. No

Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

1. How does your agency identify LEP individuals? (Select all that apply)	☐ Assume limited English proficiency if communication seems impaired ☐ Respond to individual requests for language assistance services ☐ Self-identification by the non-English speaker or LEP individual ☐ Ask open-ended questions to determine language proficiency on the telephone or in person ☐ Use of "I Speak" language identification cards or posters	Based on written material submitted to the agency (e.g. complaints) ☐ We have not identified non-English speakers or LEP individuals Other (Please specify): _____
2. Does your program have a process to collect data on:	Yes	No
a. The number of LEP individuals that you serve?	Yes	a. No
b. The number of LEP individuals in your service area?	Yes	b. No
c. The number and prevalence of languages spoken by LEP individuals in your service area?	Yes	c. No
3. How often does your agency assess the language data for your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____
4. What data does your agency use to determine the LEP communities in your service area? (Select all that apply)	☐ Census ☐ US Dept. of Education ☐ US Dept. of Labor ☐ State Agencies	☐ Community Organizations ☐ Intake information ☐ Other:_____
5. Do you collect and record primary language data from individuals when they first contact your programs and activities?	Yes	No

6. If you collect and record primary language Data, where is the information stored?	
7. What is the total number of LEP individuals who use or receive services from your program each year?	
8. How many LEP individuals attempt to access your programs or services each month?	
9. How many LEP individuals use your programs or services each month?	

10. Specify the top six most frequently encountered non-English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).	Language 1. 2. 3. 4. 5. 6.	Frequency of Encounters 1. 2. 3. 4. 5. 6.

Providing Language Assistance Services

The following set of questions will help you assess how well your agency is providing language assistance services to LEP individuals:

1. Does your agency currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?	Yes	No
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)	☐ Primary language of persons encountered or served ☐ Use of language assistance services such as interpreters and translators ☐ Funds or staff time spent on language assistance services	☐ Number of bilingual staff ☐ Cost of interpreter services ☐ Cost of translation of materials into non-English languages ☐ Other (Please specify):_____
3. Does your agency have a system to track the cost of language assistance services?	Yes	No

4. What types of language assistance services does your agency provide? (Select all that apply)	☐ Bilingual staff ☐ In-house interpreters (oral) ☐ In-house translators (documents) ☐ Contracted interpreters ☐ Contracted	☐ Language bank or dedicated pool of interpreters or translators ☐ Volunteer interpreters or translators ☐ Interpreters or
	translators ☐ Telephone interpretation services ☐ Video interpretation services	translators borrowed from another agency ☐ Other (Please specify): _____
5. Does your agency a) have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals? b) Does the process include use of standardized language proficiency exams?	a) Yes b) Yes	a) No b) No
6. Does your agency ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret?	Yes	No
7. Does your agency have contracts with language assistance service providers (in person interpreters, telephone interpreters, video interpreters, or translators)?	Yes	No
8. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?	Yes	No
9. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area?	Yes	No
10. Which vital written documents has your agency translated into non-English languages?	☐ Consent forms ☐ Complaint forms ☐ Intake forms ☐ Notices of rights ☐ Notice of denial, loss or decrease in benefits or services ☐ Notice of disciplinary action	☐ Applications to participate in programs or activities or to receive benefits or services ☐ Other (please specify): _____
11. Does your agency translate signs or posters announcing the availability of language assistance services?	Yes	No

12. When your agency updates information on its website, does it also add that content in non-English languages?	Yes	No

Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals?	Yes		No	
2. Who receives staff training on working with LEP individuals? (Select all that apply)	☐ Management or senior staff ☐ Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals		☐ Bilingual Staff ☐ New employees ☐ All employees ☐ Volunteers ☐ Others (Please specify): _____ ☐ None of the above	
3. Are language access policies and LEP issues included in the mandatory training curriculum for staff?	Yes		No	
4. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals?	Yes		No	
5. Does staff receive periodic training on how to obtain and work with interpreters?	Yes		No	
6. Does staff receive periodic training on how to request the translation of written documents into other languages?	Yes		No	
7. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?	Yes		No	

8. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?	Yes	No

Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)	☐ Frontline and outreach multilingual staff ☐ Posters in public areas ☐ "I Speak" language identification cards distributed to frontline staff ☐ Website	☐ Social networking website (e.g. Facebook, Twitter) ☐ E-mail to individuals ☐ Other (Please specify): _____ ☐ None of the above
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services?	Yes	No
3. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)?	Yes	No
4. Does your agency inform community groups about the availability of free language assistance services for LEP individuals?	Yes	No
5. Does your agency inform current applicants or recipients about the availability of language assistance services?	Yes	No
6. Does the main page of your agency website include non-English information that would be easily accessible to LEP individuals?	Yes	No
7. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services?	Yes	No

Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your agency have a written language access policy?	Yes	No
2. If so, is a description of this policy available to the public?	Yes	No
3. How often is your agency's language access policy reviewed and updated?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____
4. When was the last time your agency's language access policy was updated?	Month_____	Year_____
5. How often does your agency update its data on the LEP communities in your service area?	☐ Annually ☐ Biennially	☐ Not Sure ☐ Other:_____
6. Does your agency have a language access coordinator?	Yes	No
7. Does your agency have a formal language access complaint process?	Yes	No
8. Has your agency received any complaints because it did not provide language assistance services?	Yes	No
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?	Yes	No
10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?	Yes	No