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I. APPLICABILITY/SCOPE

This policy applies to program services delivered through the U.S. Department of Labor Workforce Innovation and Opportunity Act (WIOA) and Strengthening Working Families Initiative (SWFI) Grant. This policy impacts all internal and external partners who are part of service delivery system.

II. PURPOSE

This policy outlines how Limited English proficient (LEP) customers can access program services.

III. BACKGROUND

Executive Order 13166 was signed, August 11, 2000, "requires Federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them." Executive Order No. 13166, "Improving Access to Services for Persons with Limited English Proficiency," was affirmed by President Bush through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to LEP users of Federal programs. In addition, Federal agencies were told to look at how they served people who were limited in their English proficiency and to see what measures they could take in their direct contacts with LEP individuals that would increase meaningful access. This policy remains in force under WIOA.

IV. DEFINITIONS

"Limited English Proficient (LEP) individual": An individual whose primary language for communication is not English and who has a limited ability to read, speak, write and/or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). Similarly, LEP designations are context specific. For example, an individual may possess sufficient English language skills to function in one setting (e.g., reading a recipient's hours of operation or greeting an individual), but the individual's skills may be insufficient in other settings (e.g., completing a legal document or discussing eligibility requirements). This definition is added because discrimination based on limited English proficiency may be a form of unlawful national origin discrimination.


Title I: Adult, Dislocated Worker and Youth Programs.

Title III: Employment Services, Wagner-Peyser Programs.

Title IV: Vocational Rehabilitation Programs.

V. POLICY

The Phoenix Business and Workforce Development Board will require staff to appropriately identify LEP customers who are engaged in services at any Job Center or subcontractor location and ensure they receive the same level and

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quality of services as any other customer under WIOA. Refer to the supplemental Procedures under this policy for guidance on identification and service for LEP individuals.

A. TRANSLATION OF WRITTEN MATERIALS:

1. Translation requests are processed through each department’s Public Information liaison. Staff can forward essential documents that are currently in use at the Job Career Centers to their Public Information Officer (PIO) for translation. Once PIO receives a request for translation, it is reviewed for grammar and style and then sent to the translation service contractor. When the translated document is returned to PIO, it is given to the City of Phoenix translator for final review and approval.

B. TELEPHONE GREETINGS:

1. All ARIZONA@WORK City of Phoenix Job Centers shall have a Spanish language option available on any recordings that precede staff assistance (auto attendant) on the main telephone number. Information recorded on this option shall be consistent with information recorded on the English version of the voice mail.

C. STAFF TRAINING AND MONITORING:


1. Training will be available to all ARIZONA@WORK – City of Phoenix system staff as needed. Job Center Supervisors will be responsible for ensuring that new forms, documents, services and activities or changes to program or services are reported to the Equal Opportunity Liaison.

D. PROVIDING NOTICE TO LEP PERSONS:

1. It is important to let LEP persons know that language assistance is available and at no cost to the customer. Notice will be written and/or communicated in the Spanish language and will be provided in the following manner:
 - a. Posting signs in intake areas and other points of entry.
 - b. Placing notices that language services are available in outreach documents, (brochures, booklets, recruitment information).
 - c. Working with community and faith- based organizations to inform LEP persons of language assistance availability
 - d. Including notices in local newspapers printed in languages other than English
 - e. Providing notices through non-English radio and television stations about the availability of language assistance services.

E. PROVIDING SERVICES TO SHARED CUSTOMERS

1. For customers who receive services from Title I, Title III and Title IV and are considered shared customers, staff can utilize the Department of Economic Security Language Line through coordination with the Title III Supervisor.
2. For all other customers, staff will utilize language translation services through United Language Group.

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VI. POLICY MANAGEMENT REQUIREMENTS

Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board’s Executive Leadership Committee. All other substantive revisions will go to the PBWD Board’s Executive Leadership Committee for review and recommendation to the PBWD Board for approval.

VII. ATTACHMENTS

- A. Language Identification “I Speak” Cards
- B. Language Flyer