

Yuma Private Industry Council

Limited English Proficiency (LEP) Policy

I. Purpose

This document serves as the policy for the Workforce Investment Act (WIA), Yuma Private Industry Council (YPIC) to provide to persons with Limited English Proficiency (LEP) services that are in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.; 45 C.F.R. § 42.101-41.112). The purpose of this policy is to provide a framework for the provisions of timely and reasonable language assistance to LEP persons who come in contact with the Yuma Private Industry Council.

This LEP policy was developed to ensure meaningful access to its programs and activities by persons with Limited English Proficiency. In accordance with federal guidelines, the Yuma Private Industry Council will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for WIA Services.

II. Meaningful Access:

Meaningful access is free language assistance in accordance with federal guidelines. YPIC will assess and update the following factors, including but not limited to:

1. The number or portion of LEP persons eligible to be served or likely to be encountered by the One Stop Center.
2. The frequency with which LEP persons using a particular language come into contact with YPIC.
3. The WIA resources and the cost of providing meaningful access.
Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

III. Needs Assessment

Yuma, East and South County

According to the Arizona Workforce Informer and the Arizona Job Connection (AJC) data collection systems, the most frequently used languages for WIA services are:

1. English
2. Spanish

YPIC will make every effort to provide services to all LEP persons. However, the following list shows the foreign language that is most frequently used in this geographic area:

1. Spanish
2. Native American

Other foreign languages identified include the following:

- | | | |
|-----------|-------------|------------|
| 1. French | 4. Chinese | 7. Navajo |
| 2. German | 5. Italian | 8. Slavic |
| 3. Korean | 6. Japanese | 9. Tagalog |

This information is based on data collected from the Arizona Workforce Informer (www.workforce.az.gov) and the AJC system (www.azjobconnection.com).

IV. Language Assistance

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to WIA program and activities.
2. YPIC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and YPIC determines the client is an LEP person and language assistance is necessary to provide meaningful access, YPIC will make reasonable efforts to provide free language assistance. If reasonable/possible, YPIC will provide the language assistance in the LEP client's preferred language.
3. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. YPIC will determine when interpretation and/or translation are needed and/or reasonable.

The need of an interpreter may be identified by the LEP person's behalf by any YPIC staff. The need of an interpreter also may be made known at the time of the registration process. The One Stop staff will display an "I Speak" identification flashcard to determine the LEP person's primary language.

4. Informal interpreters may include the family member, friend, legal guardians, service representatives or advocates of the LEP client. YPIC staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstance, informal interpreters, especially children, are not competent to

provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.

If an LEP client prefers an informal interpreter, after YPIC has offered free interpreter services, the informal interpreter may interpret.

5. To facilitate communication between LEP individuals and staff, YPIC uses the following resources to the degree that the resources are available:
 - Bilingual employees to communicate in Spanish; and,
 - “I Speak” translation cards, to identify the individual’s primary language

V. Translation of Documents

YPIC understands the importance of translating forms and documents so that LEP individuals have greater access to services. YPIC materials are translated into Spanish; these translated forms are available internally and to the customers. YPIC’s vital documents include, but are not limited to, the following for any services, benefit and program.

- Registration and eligibility documentation;
- Documents that require response;
- Letters or other written documents that contain information regarding participation in a program;
- Consent and complaint forms;
- Equal Opportunity is the Law;
- Any other document deemed vital due to the importance of the program, information, or services involved and the consequences to the LEP person.
- Marketing materials, YPIC brochures and flyers.
 - a. YPIC shall translate its vital documents into languages used significantly by its LEP customers.
 - b. YPIC will identify LEP customer’s case files are noted as LEP customers and identify the LEP’s person’s primary language. The staff shall interact with the individual in a manner consistent with the LEP’s plan unless the customer indicates otherwise.

VI. Staff Training

YPIC is committed to providing LEP training opportunities for all staff members. The staff should be aware of their obligations to provide meaningful access for LEP persons to services, benefits and activities.

While individuals with little or no contact with LEP persons may only have to be aware of the LEP policy, management staff should be fully aware of and understand the policy so they can reinforce its importance and ensure implementation by staff.

Training and learning opportunities currently offered by YPIC will be expanded or continued as needed. Those opportunities include:

- Diversity training;
- Cultural competency training;
- LEP plan training;
- New employee orientation training

VII. Public Outreach and Notification

The Yuma Private Industry Council's LEP policy will be provided to the public on request and make notification at the first point of contact. Notification includes signs in intake areas or other customer entry points, outreach documentation such as posters and written documents. YPIC shall maintain copies of written documents such as flyers or posters intended to be used to notify persons of language assistance. Flyers, posters and written documentation shall be maintained in locations in which direct service to customers is provided and shall be readily available to customers without the need of staff intervention.

VIII. Monitoring and Evaluation

The LWIA will review the LEP plan no less than every 12 months. The review will include data collection and record keeping as an effective method of monitoring and compliance system. Data collection also allows an overview of how the services are provided. The review will include:

- Number of LEP persons requesting language assistance;
- Assessment of current language needs to determine if additional services or translated materials should be provided;
- Solicitation and review of feedback from LEP communities within the county;
- Assessment of whether staff adequately understand LEP policies and procedures and how to carry them out;
- Review of feedback from employee training sessions;
- Customer satisfaction feedback; and,
- Tracking LEP customers through the Career Resource Center registration Kiosk and affiliated satellite sights.

IX. Technical Assistance

The YPIC LEP contact shall be available to coordinate efforts toward compliance with the LEP Plan. Staff shall, elevate LEP questions to the LEP contact. Staff shall also include timeframe for the LEP contact to respond or to elevate the question to the State of Arizona Equal Opportunity Officer.

Local Office

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The State of Arizona

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XII. Plan Distribution

- Distribute to all YPIC staff.
- Reviewed in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.
- Available at the LWDA Administration Office at 3834 W. 16 Street, Yuma, Az 85364

The Yuma Private Industry Council is an Equal Opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities.