



Local Policies – Administration and Governance

Language Access Policy - LAP

Effective Date

10/31/2024, Revisions 2/2/2026, 3/2/2026

Purpose

This policy provides guidance and establishes the procedures regarding the prohibition against national origin discrimination as it affects persons with Limited English Proficiency (LEP). This policy applies to the Northeast Iowa Local Workforce Development Board (NEIWDB) and other Workforce Innovation and Opportunity Act (WIOA) Title I subrecipients. This policy is effective immediately.

Attachment I of this policy contains the Northeast Iowa Local Workforce Development Board's (NEIWDB) Limited English Proficiency (LEP)

Background

The nondiscrimination and equal opportunity provisions found in Section 188 of WIOA and 29 CFR Part 38 prohibit discrimination on the basis of race, color, religion, national origin (including LEP), age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I-financially assisted program or activity.

Policy and Procedures

National origin discrimination now includes LEP under 29 CFR Section 38.9 and specifically states that in providing any aid, benefit, service, or training under a WIOA Title I-financially assisted program or activity, a recipient must not, directly or through contractual, licensing, or other arrangements, discriminate on the basis of national origin, including LEP. Additionally, 29 CFR Section 38.41 added "LEP and preferred language" to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registant, participant, and terminee.

Definitions

For the purposes of this policy, the following definitions apply:

Babel Notice – a short notice included in a document or electronic medium (e.g. website, "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 (29 CFR Section 38.4(i)).



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Employment-Related Training – training that allow or enables an individual to obtain skills, abilities and/or knowledge that are designed to lead to employment (29 CFR Section 38.4(t)).

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. A LEP individual 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) (29 CFR Section 38.4(hh)).

LEP Plan – a written language access plan which assists in ensuring that LEP individuals have meaningful access to WIOA Title I-financially assisted programs and activities (29 CFR Section 38.9 Appendix).

Meaningful Access – language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

Primary Language – an individual’s primary language is the language in which an individual most effectively communicates, as identified by the individual.

Reasonable Steps to Ensure Meaningful Access for LEP Individuals:

Subrecipients are required to take reasonable steps to ensure that LEP individuals have meaningful access their programs and activities. Reasonable steps may include, but are not limited to, the following:

- Conducting an assessment of a LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English, to LEP individuals.
- Conducting outreach to LEP communities to improve service delivery in needed languages.

(29 CFR Section 38.9(b)(1))

Reasonable steps for providing meaningful access to training programs may include, but are not limited to the following:

- Written training materials in appropriate non-English languages by written translation, or by oral interpretation, or summarization.
- Oral training content in appropriate non-English languages through in-person or telephone translation.

(29 CFR Section 38.9 (b)(2)(i)(ii))

Furthermore, subrecipients should ensure that every program delivery program, whether it be in person, electronic, or by phone, conveys in the appropriate language how a LEP individual may effectively learn



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about, participate in, and/or access any aid, benefit, service, or training available to them. It should also be noted that as new methods for the delivery of information or assistance are developed, subrecipients are required to take reasonable steps to ensure that LEP individuals remain able to learn about, participate in, and/or access any aid, benefit, service, or training available to them (29 CFR Section 38.9(c)).

Language Assistance Services:

Language assistance generally comes in two forms: oral interpretation or written translation. The NEIWDB will ensure that above all, these services are free of charge and provided in a timely manner. A LEP individual must be given adequate notice about the existence of interpretation and translation services and that they are available free of charge. Language assistance will be considered timely when it is provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training (29 CFR Section 38.9(d) and (e)).

Interpreter Services:

LEP individuals are not required to provide their own interpreter. Furthermore, there shall be no expectation that the LEP individual will provide their own interpreter, including their minor child or adult family or friend to interpret or facilitate communication, except for the following circumstances:

- In emergency situations while awaiting a qualified interpreter.
- When the information conveyed is of minimal importance to the services to be provided.
- When a LEP individual specifically requests that an accompanying adult provide language assistance, and they agree to provide assistance to the individual. If a subrecipient permits an accompanying adult to serve as an interpreter for a LEP individual, it must make and retain a record of the LEP individual's decision to use their own interpreter.

Finally, where precise, complete, and accurate interpretations or translation of information and/or testimony are critical for adjudicatory or legal reasons, subrecipients can still provide their own, independent interpreter, even if a LEP individual wants to use their own interpreter as well. This also applies in cases where the competency of the interpreter requested by the LEP individual is not established.

(29 CFR Section 38.9(f))

Center staff will provide adequate notice to LEP individuals of the existence of interpretation and translation services and that these language assistance services are available free of charge.

A language identification document is located at each One-Stop Center reception area for LEP customers to identify their language. For LEP individuals, the One-Stop Center will offer assistance through the State contracted services of Language Link. Local staff/partners have access to the service via a toll-free number.



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Concerning Vital Information:

For languages spoken by a significant portion of the population eligible to be served or likely to be encountered, subrecipients must translate vital information in written materials into these languages. These translators must in turn be readily available upon request in hard copy or electronically. Written training materials offered or used within employment-related training programs (see definitions section) are excluded from these translation requirements. However, in all cases, subrecipients must take reasonable steps to ensure meaningful access for LEP individuals.

For languages not spoken by a significant portion of the population eligible to be served or likely to be encountered, subrecipients must take reasonable steps to meet the particularized language needs of LEP individuals who seek to learn about, participate in, and/or access the aid, benefit, service or training that is available to them. Vital information may be conveyed orally if not translated.

Center staff must include a “Babel notice,” indicating in appropriate languages that language assistance is available in all communications of vital information. Examples of documents containing vital information include, but are not limited to

- applications;
- consent and complaint forms;
- notices of rights and responsibilities;
- notices advising LEP individuals of their rights under this part, 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.

(29 CFR Section 38.9(g))

Finally, to the extent otherwise required by 29 CFR Part 38, once a recipient becomes aware of the non-English preferred language of a LEP beneficiary, participant, or applicant for aid, benefit, service or training, the recipient must convey vital information in that language.

(29 CFR Section 38.9(h))

Referrals:

One-Stop Center staff are encouraged to make referrals to Adult Education and Literacy programs for customers wishing to advance their English proficiency.

Outreach and Inclusion:



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In an effort to broaden the composition pool of individuals considered for participation in programs and activities and to ensure the NEIWDB provides outreach to all populations and identified target populations, the NEIWDB utilizes its local demographic information. The demographic information (race, ethnicity, age, and English-proficiency) is compared to data that represents demographic information for the individuals we are serving. This locally specific information is used for planning efforts and to develop services in accordance with specific local population growth. The data is analyzed periodically to ensure the local area is serving the populations it represents by the core partner leadership team.

The Equal Opportunity Officer, alongside the One-Stop Operator and Core and Required Partners will develop outreach plans based on multiple resources including, but not limited to, feedback from Center staff, comments and concerns from customers/participants, and results of the Equal Opportunity Officer's data analysis. The Center's core partner leadership team is responsible for implementing the outreach plan within their centers. The local Equal Opportunity Officer and One-Stop Operator will assist and follow up with each Center to ensure the outreach plan is being followed.

Written LEP Plan:

In order to ensure that reasonable steps are taken to allow meaningful access for LEP individuals, the NEIWDB has developed a written LEP plan (Attachment I).

For additional information on best practices and resources for serving individuals with substantial cultural and language barriers to employment, subrecipients are encouraged to review DOL TEN 28-16, *"Best Practices, Partnership Models, and Resources Available for Serving English Language Learners, Immigrants, Refugees, and New Americans."*

Annual Evaluation:

The local Equal Opportunity Officer or designee, in partnership with the One-Stop Operator and appropriate Core and Required Partners will conduct an annual review of the LEP Plan implementation, including the language access needs of our customer populations. A review of procedures to ensure compliance with this plan and identify any areas where policies, processes, and procedures can be improved as it relates to providing LEP individuals meaningful and equitable access to programs and services. The NEIWDB will assess the efficacy of the plan, including, but not limited to, the resources and equipment used for the delivery of language assistance, complaints filed by LEP persons, etc. The NEIWDB will update and monitor the implementation of this plan, as necessary.



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Limited English Proficiency (LEP) Plan (Attachment 1)

A. Summary

Individuals who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may incur a barrier to employment and are entitled to language assistance in their effort to enter the workforce. The quality and accuracy of the language is critical to these efforts and shall be provided in a timely manner to ensure maximum access to services.

This plan provides individuals with Limited English Proficiency (LEP) access to programs and services provided by American Jobs Centers (“AJCs”, or IowaWORKS Centers) and the Northeast Iowa Local Workforce Development Board (“NEIWDB”), on an equitable basis. This plan is applicable to all subrecipients of the LWDB that receive Federal financial funds. This plan reflects the LEP needs of Workforce Innovation and Opportunity Act (WIOA) operations in all local offices.

B. Overview

1. The Northeast Iowa Local Workforce Development Board and its providers will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and equal opportunity to participate in workforce development programs, activities, information, and other benefits regardless of their ability to speak, read, write, or understand English. The Northeast Iowa Local Workforce Development Board’s plan will ensure meaningful communication with LEP individuals involving their workforce development needs and services. This plan provides for the communication of information contained in vital documents (e.g. program application, rights and responsibilities, etc.) All interpreters, translators, and other aid needed to comply with this plan shall be provided without cost to the person being served, and the individual will be informed of the availability of such assistance free of charge.
2. The Northeast Iowa Local Workforce Development Board will conduct a review of the language access needs of its customer populations and update and monitor the LEP Plan every year. The Local Workforce Development Board Equal Opportunity Officer will oversee the implementation of the LEP Plan.

C. Purpose

1. The purpose of this plan is to establish and affirm the full commitment of the Northeast Iowa Local Workforce Development Board (NEIWDB) to ensure customers, regardless of their national origin or language barriers, shall receive, free of charge, the language assistance necessary to afford them meaningful access to the programs, services, activities, and information of the One-Stop Centers, consistent with Title VI of the Civil Rights Act of 1964 and other applicable federal civil rights requirements related to national origin and language access. This plan provides the framework to ensure Limited English Proficiency (LEP) individuals will be provided meaningful and equitable access to all workforce development



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programs and services offered through the Northeast Iowa Local Workforce Development Area (NEIWDB) and each of the One-Stop Centers.

2. This plan does not create new services, but instead eliminates or reduces, to the maximum extent practicable, LEP as a barrier to accessing existing information, programs and activities.

D. Scope

1. The NEIWDB shall be responsible for identifying major concentrations of ethnic groups with Limited English Proficiency; staff training needs; inventorying and identifying language assistance aids such as posters, handbooks, forms, handouts, etc.; and developing other language assistance aids to assist with service delivery.
2. The NEIWDB LEP Plan shall be reviewed and updated on an annual basis except for any major changes in demographics, types of services, program changes, or other factors affecting a specific geographic location. Should any of these changes occur, an immediate review of the situation, and plan update will be completed. The annual review, as well as any necessary modifications, will be conducted by the NEIWDB.
3. The WIOA funds will be used to support procurement of language assistance materials and to support costs associated with group language assistance training. Individual clients who require language assistance training and are eligible for WIOA programs and services may be funded from the specific program area funds (Adult, Dislocated Worker, and Youth).
4. The goal of this plan is to function as a tool used to assess the effectiveness of the NEIWDB's service delivery to LEP individuals.

E. Application

1. The Northeast Iowa Local Workforce Development Board will provide a variety of communication options to ensure that individuals with limited English proficiency (LEP) will be effectively informed about and/or able to participate in the workforce development programs, activities, services and information in the Northeast Iowa Local Area. This will entail the provision of competent and confidential language interpretation services and the provision of written materials translated into languages other than English, as needed.
2. In order to comply with federal civil rights laws prohibiting discrimination based on national origin, including limited English proficiency, the NEIWDB has established this LEP Plan to ensure no individual is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination due to any of the following:
 - a. they (or their families or ancestors) are from a particular county or part of the world,
 - b. their ethnicity or accent (including physical, linguistic, and cultural characteristics), or
 - c. a perception that the individual is of a certain national origin.

F. Requirements

1. LEP individuals are those individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.



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2. Center staff must take reasonable steps to ensure meaningful access to each LEP individual served or encountered so that LEP individuals are effectively informed about and/or able to participate in the program or activity.
 - a. Reasonable steps to provide meaningful access to training programs may include, but are not limited to, providing:
 - i. Written training materials in appropriate non-English languages by written translation or by oral interpretation or summarization; and
 - ii. Oral training content in appropriate non-English languages through in-person interpretation or
 - iii. telephone interpretation.
3. For languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, the One-Stop Center must have available translation of vital information in written materials into these languages and make the translations readily available in hard copy, upon request, or electronically such as on a website.
 - a. Vital information is defined as information whether written, oral or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; necessary for an individual to obtain any aid, benefit, service, and/or training; or required by law.
4. In order to full fill the requirements in this section, the NEIWDB has established the following local LEP Plan.

LEP Plan

Administration of Plan

1. Disability Access Committee (DAC). The NEIWDB has a Disability Access Committee (DAC) to support efforts that ensure quality access for all individuals. The Disability Access Committee (DAC) will ensure that all staff are trained on all aspects of LEP individual Center access and support.
2. One Stop Operator (OSO). The NEIWDB has a One Stop Operator (OSO) whose responsibility is to coordinate service delivery in a way that supports compliance with this LEP individual plan.
3. Equal Opportunity (EO) Officer. The NEIWDB Equal Opportunity (EO) Officer monitors and evaluates compliance with equal opportunity laws, guidelines, and policies. As such, any complaints or areas of non-compliance found related to equal opportunity requirements and this policy/plan will be submitted to, reviewed, and addressed by either the local EO Officer, or, in their absence, the designated state EO Officer.

The Four Factor Analysis



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Recipients of federal funding, including subrecipients, are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, federal civil rights enforcement practices recognize that the starting point is an individualized assessment that balances the following four factors:

Factor 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population

The U.S. Census Bureau has a range of four classifications of how well people speak English. The classifications are (1) 'Very Well,' (2) 'Well,' (3) 'Not Well,' and (4) 'Not At All.' For planning and statistical purposes, we are considering individuals who speak English at any level below "Very Well" as Limited English Proficient (LEP).

As part of this planning process, we have included statistics from the U.S. Census Bureau 2022 American Community Survey 5-Year Estimates Table to illustrate the number of individuals living in the program area who speak English less than "Very Well." In addition, this U.S. Census survey indicates the number of individuals in each language group among the total population of individuals who speak English less than "Very Well." These statistics help to identify prominent and/or growing language groups for planning purposes at a Local Workforce Development Area (LWDA) level.

Factor 2: The Frequency with Which LEP Individuals Come in Contact With the Program

The program must be evaluated in relationship to the number of LEP persons who are within the program area and the number of times those persons have frequented the program or activity. The NEIWDB utilizes IowaWORKS, the State of Iowa's public labor exchange system, to provide information to job seekers, to register program applicants and participants, and to list available jobs. User statistics have been pulled from IowaWORKS Registered Individuals, which indicate voluntary self-identification information, which may help to indicate a potential need for language assistance among individuals.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient

The NIEWDB provides a wide range of programs, activities and services. The NEIWDB provides Veterans Services, Job Seeker Services, Business Services, and a multitude of other services. The NEIWDB is responsible for administering numerous programs that receive Federal funding, including: WIOA, Veterans, Rapid Response, and many other programs receiving Federal funding or grants.

Factor 4: The Resources Available to the Recipient and Costs

The NEIWDB serves the Northeast Iowa Local Area and is required by Federal law to provide access to LEP persons, and to ensure that its subrecipients also provide such access. Currently, internet sites can be utilized to translate some materials. Additionally, local staff have been



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identified to provide some oral translation and all IowaWORKS Centers have access to Language Link translation service by telephone.

Furthermore, many of the common forms are available in English and Spanish at IowaWORKS Centers, with some other languages also available as necessary. Additionally, translation activities are an eligible administrative expense. Therefore, limited LEP measures are reasonable given the resources available to the NEIWDB.

Identifying Individuals with Limited English Proficiency

To achieve equal access to all programs offered by the NEIWDB, it is essential to conduct a thorough assessment of the language needs of the populations served by attempting to identify LEP individuals. In order to identify language needs, the NEIWDB has reviewed available language data from the U.S. Census American Community Survey.

Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the NEIWDA		
Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish	4513	42%
French, Haitian or Cajun	909	.08%
German or other West Germanic languages	738	Below 0%
Russian, Polish or other Slavic languages	1447	.07%
Other Indo-European languages	205	Below 0%
Korean	56	Below 0%
Chinese (incl. Mandarin, Cantonese)	150	Below 0%
Vietnamese	217	Below 0%
Tagalog (incl. Filipino)	440	.04%
Other Asian and Pacific Island Languages	1561	.15%
Arabic	75	Below 0%
Other and unspecified languages	385	.04%
LWDA Total:	10,696	80%

Source: US Census Bureau, 2023 American Community Survey, 5-Year Estimates out of 488,353 population table C6001

1. Spanish Speakers: The largest group of individuals who speak English less than "very well" are Spanish speakers, with 4,513 individuals making up 0.42% of the total population in the NEIWDA. This indicates a significant need for resources and services tailored to Spanish-speaking communities.

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2. The number of individuals speaking French, Haitian, or Cajun languages has increased substantially in Northeast Iowa from data sets between 2021-2023, growing from 38 to 909 individuals, primarily concentrated in Black Hawk County.
3. German or Other West Germanic Languages: There are 738 individuals who speak German or other West Germanic languages less than "very well," but this represents a very small fraction of the total population.
4. Russian, Polish, or Other Slavic Languages: With 1,447 individuals in this category, these speakers are a notable group within the population that may also benefit from language support services.
5. Other Asian and Pacific Island Languages: This group has 1,561 individuals, suggesting a diverse range of languages within this category, requiring language accessibility resources.
6. Other Languages: Many other language groups, such as Tagalog, Vietnamese, and Arabic, have relatively smaller populations that speak English less than "very well," but they still represent an important part of the region's diversity.
7. Overall Total: The total number of people in the Northeast Iowa local area who speak English less than "very well" is 10,696, which constitutes about 0.80% of the overall population. This shows that while the percentage might seem small, these individuals collectively represent a significant number of people needing language assistance.

This data suggests that the local area has a diverse population with multiple language needs.

Operational Guidelines for Language Assistance Services

1. Identifying LEP Individuals

At the point of first contact with an LEP individual, staff should make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services and make reasonable efforts to obtain such services if they are needed to effectively communicate with the individual.

Staff can determine whether a person needs language assistance in several ways:

- Inquiring if the individual identifies him/herself as a non-English speaker, LEP individual, or companion thereof;
- Inquiring as to the primary language of the individual who identified him/herself as needing language assistance services;
- Asking a multilingual staff or qualified interpreter to verify an individual's primary language;
- Observing the individual's use of an "I speak ... [language]" identification card or poster.

2. Oral Language Interpretation

Staff will assist LEP persons in face-to-face and telephone encounters with oral interpretations from qualified interpreters or employees. At the point of first contact, the employee will determine whether the person is LEP by determining the primary language and implement or procure the appropriate language assistance. Staff may identify an individual's primary language using the following:

- "I speak ... [language]" identification cards.
- Displaying language identification posters within work units that typically serve LEP persons.
- Verifying foreign language proficiency by using a qualified interpreter (in person, telephonically, or through video interpretation services).
- Written translations of vital printed documents in relevant languages such as application procedures or training documentation.

Strictly limit and do not encourage the use of friends or family as interpreters. Permit such use only after meeting all of the following conditions:

- The LEP person declines the right to free interpreter services and requests the use of a family member or friend;
- When the information conveyed is of minimal importance to the services to be provided;
- The use of such a person will not compromise the effectiveness of services or violate the LEP person's confidentiality; and
- The LEP person's file documents the offer and declination of free interpreter services. If a LEP person elects to use a friend or family member as an interpreter, LWDB suggests that an alternate interpreter sit in on the encounter to ensure the accuracy of the interpretation.

3. Translation of Written Materials

Translation of written material is the replacement of written text from one language (source language) into equivalent written text in another language (target language).

- Written materials may include but are not limited to: letters containing important information regarding participation in programs; notices pertaining to the granting or denial of benefits; notices of appeal rights; notices that require responses from beneficiaries; notices advising LEP individuals of the availability of free language assistance; and other outreach materials. Translation may include all or part of a document.
- It will be determined, on a case-by-case basis, the extent of the obligation to provide translated documents. Consider translating any document or information if it contains critical information for accessing WIOA programs, services, benefits or is required by law.
- The individual translating materials must be appropriately qualified and the translations accurately convey the required information. For example, some verbatim translations may not accurately convey the substance contained in the original written materials.



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- To determine the resources available to provide language assistance to LEP persons and the costs associated with those resources, the LWDB and subrecipients shall explore the most cost-effective means of delivering competent and accurate language services. This exploration includes determining costs associated with translating documents, contracting interpreters, and securing other language assistance methods as needed in addition to using subrecipient staff who can assist customers in specific languages.

4. Local Office Language Assistance Measures

Language assistance services are available throughout the Northeast Iowa local area for many languages. Brochures, signage, and complaint forms are required to be available in multiple languages in all offices throughout the Northeast Iowa local area. The NEIWDB maintains ongoing efforts to create and provide translation of Equal Employment Opportunity (EEO) brochures, posters, and customer materials.

Assistance may include interpreters, translated versions of documents/information, referral to English as a Second Language courses, or other appropriate services, which will enable the individual to enter the workforce.

Specific language assistance available at each Iowa **WORKS** location in the Northeast Iowa local area as follows:

Name of Facility	Address	Non-English Languages Spoken by Staff
Decorah Iowa WORKS	312 Winnebago St, Decorah	Spanish
Dubuque Iowa WORKS	680 Main St, 2 nd Floor, Dubuque	Spanish, Russian
Mason City Iowa WORKS	600 South Pierce Ave, Mason City	Spanish
Waterloo Iowa WORKS	3420 University Ave, Waterloo	Spanish, Bosnian, Serbian, Croation

5. Interpreter Limitations

1. LEP individuals are not required to provide their own interpreter and there should be no expectation on the part of the service provider(s) at the Center that the LEP individual will provide their own interpreter, this includes the LEP individual's minor child or adult family or friend(s).
 - a. An LEP individual's minor child or adult family or friend(s) may interpret or facilitate communication in emergency situations while awaiting a qualified interpreter; or
 - b. An accompanying adult (but not minor child) may interpret or facilitate communication when:



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- i. the information conveyed is of minimal importance to the services,
 - ii. the LEP individual specifically requests that the accompanying adult provide language assistance,
 - iii. the accompanying adult agrees to provide assistance, and
 - iv. reliance on that adult for such assistance is appropriate under the circumstances.
 2. When the accompanying adult is permitted to provide such assistance, Center staff must make and retain a record of the LEP individual's decision to use their own interpreter.
 3. Local Procedure:
 - a. Center staff will provide adequate notice to LEP individuals of the existence of interpretation and translation services and that these language assistance services are available free of charge.
 - b. A language identification flashcard is located at each Center reception area for LEP customers to identify their language. For LEP individuals, the Center will offer assistance through the State contracted services of Language Link. Local staff have access to the service via a toll-free number.

Access to Vital Information

1. **IowaWORKS:** IowaWORKS is the labor exchange, case management and reporting site for the LWDB programs. IowaWORKS is available in English and Spanish. IowaWORKS is accessible at <https://www.iowaworks.gov>.
2. **Northeast Iowa Workforce Development Board Website:** The NEIWDB public website provides information for workers and employers. This includes information about job searching, training, the WIOA, and many additional programs and services. The NEIWDB website provides language-access functionality, enabling users to access website content in over 50 languages. The NEIWDB site is accessible at neiaworkforce.org.
3. **Social Media:** The NEIWDB may utilize multiple social media platforms in order to improve and increase its public outreach. At this time, all information published to social media platforms is published exclusively in English.
4. **Rapid Response:** Rapid Response provides assistance to workers who are dislocated due to plant closures and substantial layoffs and is a required activity under WIOA. Rapid Response meetings provide information to dislocated workers about AJC services, WIOA training activities, Trade Adjustment Assistance, Unemployment Insurance benefits, LMI, financial counseling, Federal financial assistance, and many other job-seeker services and programs. Rapid Response staff work with the employer to determine if language assistance is needed for meetings. In some cases, the employer is able to provide oral translation services.
5. Center staff must include a “Babel notice,” indicating in appropriate languages that language assistance is available in all communications of vital information.
6. Examples of documents containing vital information include, but are not limited to:
 - a. applications;
 - b. consent and complaint forms;
 - c. notices of rights and responsibilities;



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- d. notices advising LEP individuals of their rights under this part, including the availability of free language assistance;
- e. rulebooks;
- f. 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;
- g. and letters or notices that require from the beneficiary or applicant, participant, or employee.

Referrals

1. Center staff are encouraged to make referrals to Adult Education and Literacy programs for customers wishing to advance their English proficiency.

Inclusion Efforts

1. In an effort to broaden the composition pool of individuals considered for participation in programs and activities and to ensure the Northeast Iowa Local Workforce Development Area provides outreach to all populations and identified target populations, the NEIWDB utilizes its local demographic information.
2. The demographic information (race, ethnicity, gender, age, and English-proficiency) is compared to data that represents demographic information for the individuals we are serving.
3. This locally specific information is used for planning efforts and to develop services in accordance with specific local population growth.
4. The data is analyzed periodically to ensure the local area is serving the populations it represents by the core partner leadership team.

Outreach

1. The local Equal Opportunity Officer or designee will develop outreach plans based on multiple resources including, but not limited to, feedback from Center staff, comments and concerns from customers/participants, and results of the Equal Opportunity Officer's data analysis.
2. The Center's core partner leadership team is responsible for implementing the outreach plan within their centers. The local Equal Opportunity Officer will assist and follow up with each Center to ensure the outreach plan is being followed.

Training and Annual Evaluation

1. Training on serving individuals with LEP needs shall be conducted by the NEIWDB and subrecipients for their staff. Each local Equal Opportunity (EO) Officer or designee will coordinate, schedule and implement training. LEP training shall be conducted every year, with the training materials and topics being coordinated with the EO Officer or designee. Subrecipients shall ensure that new and existing staff members periodically receive training.

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Additional training sessions may be conducted alerting staff to any major changes necessitating alterations to the LEP plan that would directly influence daily activities. Likewise, training materials and tools are shared with staff through meetings and emails as the LWDB or the subrecipient becomes aware of them. Some of these items include, but are not limited to, resources such as: “I Speak Cards”, free website translations services, available federal and state language access resources,, and U.S. Census data.

2. The content, details and topics of training will be determined based upon needs, recommendations by staff and by the EO officer, as well as budget constraints. Training may include but is not limited to:
 - Identifying the language needs of LEP individuals;
 - Working with interpreters in-person or on the telephone;
 - Requesting documents for translation;
 - Accessing and providing language assistance services through multilingual employees, inhouse interpreters and translators or contracted personnel;
 - Professional responsibility with respect to LEP individuals;
 - Interpreter ethics;
 - Tracking the use of language assistance services; and
 - Tips on providing effective assistance to LEP individuals.
3. The LWDB strives to hire qualified candidates who possess bilingual skills in order to ensure access to services for LEP customers.
4. The local Equal Opportunity Officer or designee, in partnership with the One-Stop Operator and appropriate Core and Required Partners will conduct a review of the LEP Plan implementation, including the language access needs of our customer populations. A review of procedures to ensure compliance with this plan and identify any areas where policies, processes, and procedures can be improved as it relates to providing LEP individuals meaningful and equitable access to programs and services.
5. The Northeast Iowa Local Workforce Development Board will assess the efficacy of the plan, including, but not limited to, the resources and equipment used for the delivery of language assistance, complaints filed by LEP persons, etc. The Northeast Iowa Local Workforce Development Board will update and monitor the implementation of this plan, as necessary.

Quality Control

1. Ensuring the quality and accuracy of language assistance services provided by the NEIWDB is critical to providing LEP individuals with meaningful access to programs and activities. IowaWORKS Centers should take reasonable steps to ensure that all staff who serve as translators, interpreters or who communicate “in-language” with LEP persons are competent to do so. Factors indicating competency may include:
 - Demonstrated proficiency in communicating information accurately in both English and the other language;
 - Identifying and employing the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation), translating, or communicating fluently in the target language;



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- Knowledge in both languages of any specialized terms or concepts particular to the component’s program or activity and of any particular vocabulary used by the LEP person;
 - Understanding and following confidentiality, impartiality and ethical rules;
 - Understanding and adhering to the role as interpreter, translator or multilingual individual.
2. Efforts to gain feedback from the recipients of these services are critical. Instituting an on-line survey after receiving services can assist in assessing quality, the improvement, and the professionalism of the delivery of the interpreters/translators.
 3. Further, subrecipient staff should always record language needs in the files of LEP customers future use and as formal recording of their language needs.

Compliance and Enforcement

1. The NEIWDB is responsible for ensuring subrecipient compliance with the LEP Plan. The NEIWDB will assess annually whether a subrecipient’s procedures allow LEP persons to overcome language barriers and participate in a meaningful way in programs, services, and benefits. Prohibited practices include:
 - Providing services to LEP persons that are more limited in scope, not as effective or lower in quality, than those provided to other persons who are proficient in English;
 - Subjecting LEP persons to unreasonable delays in the delivery of services;
 - Limiting participation in a program or activity on the basis of English proficiency;
 - Failing to inform LEP persons of the right to receive free interpreter services and/or requiring LEP persons to provide their own interpreters.

Dissemination Of NEIWDB’s LEP Plan

The NEIWDB’s LEP Plan may be accessed at neiaworkforce.org.

LEP Complaint Procedures

If you think you have been subjected to discrimination involving LEP, Title VI, and related statutes please contact the NEIWDB at erika@northeastiawdb.org.

Limited English Proficiency (LEP) Plan - Title II Adult Education and ESL Screening

The Northeast Iowa Workforce Development Board acknowledges that Title II Adult Education and Literacy providers conduct intake, screening, assessment, and placement for English Language Learners (ELLs/ESL participants). The NEIWDB ensures that these processes, as implemented within the one-stop delivery system, comply with federal Limited English Proficiency (LEP) requirements and do not create barriers to participation based on national origin or limited English proficiency.

The NEIWDB will exercise oversight through coordination, monitoring, and partner agreements to ensure that screening and assessment practices are linguistically and culturally appropriate, support



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accurate placement, and allow timely access to services. LEP individuals shall not be excluded, delayed, or misclassified due to language barriers.

Language Assistance During Intake and Screening

Language assistance services, including qualified interpreters and translation of vital documents, will be provided at no cost to LEP individuals when necessary to ensure meaningful access during intake, screening, assessment, referral, and service delivery.

The use of family members or minor children as interpreters is discouraged except in emergency situations or when expressly requested by the individual and consistent with federal guidance.

Referrals Involving LEP Individuals

Referrals involving LEP individuals will be conducted in a manner that promotes continuity of services and meaningful access. LEP individuals shall not be referred to another program or provider solely due to limited English proficiency when services can be reasonably provided by the referring partner.

Oversight and Compliance

The NEIWDB retains responsibility for system-wide compliance with LEP and nondiscrimination requirements under Title VI of the Civil Rights Act of 1964, Executive Order 13166, WIOA Section 188, and 29 CFR Part 38.

One-stop partners, including Title II Adult Education providers, are expected to maintain LEP-related policies and procedures and cooperate with monitoring, training, and technical assistance activities as required by the NEIWDB or applicable state and federal agencies.