



Policies and Procedures

SECTION: Operations	POLICY # OPS 07	PAGE 1 of 4
TITLE: Limited English Proficiency	EFFECTIVE DATE: 11.26.2024	
SUPERCEDES: OPS 09 Limited English Proficiency		Dated: 3.18.2021

DISTRIBUTION: CareerSource North Central Florida (CSNCFL) Staff and Service Providers

Purpose: This policy provides guidance to the CareerSource NCFL’s staff, Partners and Service Providers regarding the obligation to provide language assistance to limited English proficient (LEP) persons.

Background: An LEP person is a person who, due to national origin, has no ability or limited ability to read, write, speak, or understand English to the extent that he or she cannot have meaningful access to a provider’s services and might be entitled to language assistance with respect to a particular type of benefit, service, or encounter.

As recipients of federal financial assistance, workforce boards, one-stop operators, and other service providers have a responsibility to assure nondiscrimination in service delivery to persons who are limited-English proficient.

Policy: CareerSource NCFL will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of CareerSource NCFL is to ensure meaningful communication with LEP customers involving their participation in the One-Stop Career Center’s services. The policy also provides for communication of information contained in vital documents, including but not limited to, program applications, consent forms, complaint/grievance forms, rights and responsibilities, etc.

All interpreters, translators and other aids needed shall be provided without cost to the person being served, and customers and their families will be informed of the availability of such assistance free of charge. Language assistance will be provided through use of competent bilingual staff, contracts or formal arrangements with local organizations

providing interpretation or translation services, or technology and telephonic interpretation services.

CareerSource NCFL will conduct a regular review of the language access needs of our jobseeker population, as well as update and monitor the implementation of the LEP policy, as necessary.

Identifying LEP Persons And Their Language

CareerSource NCFL will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or “I speak cards,” available online at www.lep.gov) to determine the language. In addition, when records are kept of past interactions with customers, the language used to communicate with the LEP person will be included as part of the record.

Obtaining A Qualified Interpreter

CareerSource NCFL’s Chief Operations Officer is responsible for:

- (a)** Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
- (b)** Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available to interpret;
- (c)** Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.
- (d)** Utilizing the Language Line if needed and providing information to staff to assist LEP individual.

Note: To use the Language Line, please connect with your MOD (Manager on Duty). Only managers are authorized to have the access code, so please keep this information confidential and do not share it with other staff members.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person’s file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services, including the use of bilingual staff, will be provided to the LEP person.

Children and other customers of CareerSource NCFL will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

Providing Written Translations

(a) When translation of vital documents is needed, each department in CareerSource NCFL will submit documents for translation into frequently encountered languages. Original documents being submitted for translation will be in final, approved form with updated and accurate information.

(b) CareerSource NCFL will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

Providing Notice To LEP Persons

CareerSource NCFL will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs (e.g. Interpretive Services, Equal Opportunity is the Law, Grievance Form) will be posted and provided in intake areas and other points of entry, including but not limited to the resource room, front desk, etc.

Monitoring Language Needs And Implementation

On an ongoing basis, CareerSource NCFL will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, CareerSource NCFL will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from customers and community organizations, etc.

Inquiries:

All questions regarding this policy memorandum may be directed to the CareerSource NCFL Equal Opportunity Officer at eo@careersourcencfl.com.

References:

Workforce Innovation and Opportunity Act (WIOA) Section 188;
Florida Commerce Limited English Proficiency Plan

OFFICIAL SIGNATURE

Phyllis Marty
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