To: All Golden Sierra Staff and Subrecipients
Subject: Limited English Proficiency (LEP) Plan
Effective Date: July 1, 2015
Revision Number: (1) August 14, 2017

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, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), 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.

This policy provides guidance and sets standards for serving LEP individuals to ensure meaningful access to WIOA-funded programs and services. No one will be denied access to information, services, or resources throughout the Golden Sierra Local Workforce Development Area (GSLWDA or LWDA or Golden Sierra) because of his/her limited proficiency in the English language, or be subjected to unreasonable delays in the receipt of such services.

Definition of 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. An 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).

Steps to Ensure Meaningful Access for LEP Individuals

On an annual basis, Golden Sierra will examine whether existing LEP resources and tools are adequate and what improvements are needed to provide outreach to LEP populations that might be underserved relative to their proportion in the service area. Golden Sierra will take reasonable steps to ensure that LEP individuals have meaningful access to WIOA programs and activities.

Golden Sierra will adopt the Department of Labor's four factor LEP analysis to determine the language needs of the LWDA.

- The number or proportion of LEP persons served/encountered in the eligible service population;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity, or service provided by the recipient; and
- The resources available to the recipient and costs.

Determination of Need

Factor 1: The number or proportion of LEP persons served or encountered

Table 1 (see attachments), drawn from American Community Survey data for 2011 – 2015, identifies languages spoken at home by ability to speak English for persons five years of age and older. The four most frequently spoken languages in the region other than English are Spanish, Tagalog, Chinese, and Russian. However, many of these individuals also speak English very well. Table 2 (see attachments) shows that Spanish speakers are the only population representing more than 2% of the eligible service population that is identified as not speaking English very well.

Factor 2: The frequency with which LEP individuals come in contact with the program
Golden Sierra's experience with LEP populations has been primarily with Spanish speakers. Outreach materials and vital program documents have regularly been translated into Spanish. Some workshops have been conducted entirely in Spanish; at other times, simultaneous translation into Spanish has been provided.

Factor 3: The nature and importance of the program, activity, or service
Golden Sierra administers workforce development programs across Placer, El Dorado, and Alpine counties. As a direct provider of services, (including access to information about Unemployment Insurance, Disability Insurance, labor market data, training providers, and community resources) signage and materials are routinely available in Spanish. Vital documents, such as applications for benefits, are available (online) in multiple languages.

Factor 4: The resources available to Golden Sierra and overall cost to provide assistance
Providing translation services and translating vital documents to allow LEP populations to participate in Golden Sierra's workforce development system is a routine practice. It is worth noting, however, that there has not been a significant demand from LEP populations to participate in Golden Sierra's programs. To the extent possible, Golden Sierra staff visits other organizations and English as a Second Language (ESL) classes involving LEP individuals, but unfortunately, the resources for conducting this type of outreach are limited.

In addition, Golden Sierra's co-located partner employs a full-time Employment Program Representative fluent in Spanish. When needed, this staff member will assist with translation. However, in some cases, the cost to implement multiple language programs, especially to provide translated documents or simultaneous translation, is significant and unfunded. [Note: the position is unfilled as of 08/14/17].

Identifying LEP Persons Who Need Language Assistance
As noted above, the most significant group requiring language assistance is the Spanish speaking population. However, Golden Sierra has also sought to identify other groups needing language assistance. Although they represent a small percentage of the population, Golden Sierra continues to monitor the needs of the LEP population and to design its programs/services to include all individuals regardless of language barriers.

Providing Language Assistance
Golden Sierra uses a number of techniques or practices to provide meaningful, early, and continuous opportunities for all interested individuals to participate in the workforce development system. The choice of whether to use the LEP individual's primary language for oral or written communication is the customer's choice. Golden Sierra will serve LEP individuals and ensure they are offered meaningful and equal access to WIOA services. Staff will describe and document how LEP customers receive services in the client's case notes.

General Measures
- Visual-aids including maps, charts, photographs, and other images are used throughout centers
- Language identification flashcards are available at the front desk
- Self-directed services (online and telephone information) are accessible in multiple languages
- The online portal for businesses and job seekers (CalJOBS) is accessible in Spanish and can be translated in additional languages with Google Translator

Translation of Vital Documents
For languages not spoken by a significant portion of the population eligible to be served or likely to be encountered, Golden Sierra will 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.

Interpreters
At a minimum, any interpreters used by Golden Sierra shall:
- Demonstrate proficiency in both English and another language
- Be knowledgeable in both languages of any specialized terms or concepts peculiar to the program or activity
- Demonstrate sensitivity to the LEP individual's culture
- Demonstrate the ability to convey information in both languages accurately

Providing Notification to LEP Individuals
Golden Sierra will inform the public and LEP persons of their rights under Title VI in the following ways:
- Golden Sierra's website shall contain information about language assistance
- A Babel Notice, indicating that language assistance is available in all communication of vital information, shall be displayed in the job centers.

Monitoring and Oversight
While maintaining a basic level of access by LEP populations to Golden Sierra's program and services, the agency will monitor demographic shifts and translation requests and adjust practices to meet demand. Golden Sierra's LEP plan will be updated as needed to reflect significant changes. Monitoring and evaluation for compliance with civil rights legislation shall be incorporated in the routine monitoring process. Evaluation of efforts in serving LEP customers shall be measured by:
- Enrollment activity
- Surveys of customers, clients, and advocates
- Periodic assessment of current data and local demographics
- Review of the effectiveness of policies and practices describing services to LEP individuals

References
WIOA (Public Law 113-128) Section 188
Title 29 Code of Federal Regulations (CFR) Part 38
WSD 17-03

	Alpine County, California		El Dorado County, California		Placer County, California	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total:	**1092**	**100.0%**	**173,716**	**100.0%**	**345,965**	**100.0%**
Speak only English	**939**	**86.0%**	**150,968**	**86.9%**	**294,071**	**85.0%**
Speak a language other than English	**153**	**14.0%**	**22,748**	**13.1%**	**51,894**	**15.0%**
Speak English less than "very well"	**43**	**3.9%**	**7,650**	**4.4%**	**17,491**	**5.1%**
Spanish or Spanish Creole:	39		12,805		24,264	
Speak English "very well"	25		7,811		15,898	
Speak English less than "very well"	14		4,994		8,366	
French (incl. Patois, Cajun):	9		650		1,148	
Speak English "very well"	9		534		999	
Speak English less than "very well"	0		116		149	
French Creole:	0		19		29	
Speak English "very well"	0		19		29	
Speak English less than "very well"	0		0		0	
Italian:	5		284		740	
Speak English "very well"	5		262		584	
Speak English less than "very well"	0		22		156	
Portuguese or Portuguese Creole:	0		144		607	
Speak English "very well"	0		101		392	
Speak English less than "very well"	0		43		215	
German:	3		705		1,782	
Speak English "very well"	3		630		1,532	
Speak English less than "very well"	0		75		250	
Yiddish:	0		0		29	
Speak English "very well"	0		0		18	
Speak English less than "very well"	0		0		11	
Other West Germanic languages:	0		107		285	
Speak English "very well"	0		95		257	
Speak English less than "very well"	0		12		28	
Scandinavian languages:	0		74		441	
Speak English "very well"	0		74		430	
Speak English less than "very well"	0		0		11	
Greek:	0		102		193	
Speak English "very well"	0		99		193	
Speak English less than "very well"	0		3		0	
Russian:	0		512		2,022	
Speak English "very well"	0		281		1,443	
Speak English less than "very well"	0		231		579	
Polish:	0		29		162	
Speak English "very well"	0		29		108	
Speak English less than "very well"	0		0		54	
Serbo-Croatian:	0		0		175	
Speak English "very well"	0		0		128	
Speak English less than "very well"	0		0		47	
Other Slavic languages:	0		109		635	
Speak English "very well"	0		109		466	
Speak English less than "very well"	0		0		169	
Armenian:	0		80		64	
Speak English "very well"	0		72		50	
Speak English less than "very well"	0		8		14	
Persian:	0		1,266		1,436	
Speak English "very well"	0		621		1,080	
Speak English less than "very well"	0		645		356	
Gujarati:	0		122		311	
Speak English "very well"	0		122		184	
Speak English less than "very well"	0		0		127	
Hindi:	0		830		853	
Speak English "very well"	0		720		572	
Speak English less than "very well"	0		110		281	
Urdu:	0		302		102	
Speak English "very well"	0		302		76	
Speak English less than "very well"	0		0		26	
Other Indic languages:	0		259		1,841	
Speak English "very well"	0		242		1,183	
Speak English less than "very well"	0		17		658	
Other Indo-European languages:	0		273		786	
Speak English "very well"	0		244		429	
Speak English less than "very well"	0		29		357	
Chinese:	0		739		2,222	
Speak English "very well"	0		438		1,127	
Speak English less than "very well"	0		301		1,095	
Japanese:	0		176		719	
Speak English "very well"	0		111		420	
Speak English less than "very well"	0		65		299	
Korean:	0		85		1,132	
Speak English "very well"	0		40		378	
Speak English less than "very well"	0		45		754	
Mon-Khmer, Cambodian:	0		42		115	
Speak English "very well"	0		31		45	
Speak English less than "very well"	0		11		70	
Hmong:	0		0		266	
Speak English "very well"	0		0		201	
Speak English less than "very well"	0		0		65	
Thai:	0		106		206	

Speak English "very well"	0	65	82
Speak English less than "very well"	0	41	124
Laotian:	0	37	72
Speak English "very well"	0	17	66
Speak English less than "very well"	0	20	6
Vietnamese:	10	380	1,304
Speak English "very well"	0	71	621
Speak English less than "very well"	10	309	683
Other Asian languages:	0	478	991
Speak English "very well"	0	443	711
Speak English less than "very well"	0	35	280
Tagalog:	0	1,148	4,574
Speak English "very well"	0	842	3,158
Speak English less than "very well"	0	306	1,416
Other Pacific Island languages:	0	455	690
Speak English "very well"	0	344	302
Speak English less than "very well"	0	111	388
Navajo:	0	0	0
Speak English "very well"	0	0	0
Speak English less than "very well"	0	0	0
Other Native North American languages:	85	28	66
Speak English "very well"	68	28	66
Speak English less than "very well"	17	0	0
Hungarian:	0	43	179
Speak English "very well"	0	34	179
Speak English less than "very well"	0	9	0
Arabic:	2	93	912
Speak English "very well"	0	76	608
Speak English less than "very well"	2	17	304
Hebrew:	0	163	99
Speak English "very well"	0	88	86
Speak English less than "very well"	0	75	13
African languages:	0	18	176
Speak English "very well"	0	18	176
Speak English less than "very well"	0	0	0
Other and unspecified languages:	0	85	266
Speak English "very well"	0	85	126
Speak English less than "very well"	0	0	140

Table 2- Populations Speaking English Less Than "Very Well" by County and Regionally
U.S. Census Bureau 2011-2015 American Community Survey 5-Year Estimates

| County | Speaks English Less than "Very Well" | | | | | | Total Speaking English Less Than "Very Well" | Speaks English "Very Well" | Speaks Only English | Total |
	Spanish	Chinese	Russian	Vietnamese	Hmong	All other languages				
El Dorado	4,994	301	231	309	0	1,815	7,650	15,098	150,968	173,716
	2.9%	0.2%	0.1%	0.2%	0.0%	1.0%	4.4%	8.7%	86.9%	100.0%
Placer	8,366	1,095	579	683	65	6,703	17,491	34,403	294,071	345,965
	2.4%	0.3%	0.2%	0.2%	0.0%	1.9%	5.1%	9.9%	85.0%	100.0%
Sacramento	72,018	21,025	12,989	13,133	9,586	57,152	185,903	245,226	935,666	1,366,795
	5.3%	1.5%	1.0%	1.0%	0.7%	4.2%	13.6%	17.9%	68.5%	100.0%
Sutter	8,149	150	118	110	126	5,982	14,635	18,331	55,719	88,685
	9.2%	0.2%	0.1%	0.1%	0.1%	6.7%	16.5%	20.7%	62.8%	100.0%
Yolo	17,265	3,749	1,642	774	89	5,313	28,832	42,467	123,868	195,167
	8.8%	1.9%	0.8%	0.4%	0.0%	2.7%	14.8%	21.8%	63.5%	100.0%
Yuba	4,700	365	24	95	777	641	6,602	9,658	51,112	67,372
	7.0%	0.5%	0.0%	0.1%	1.2%	1.0%	9.8%	14.3%	75.9%	100.0%
Region	**115,492**	**26,685**	**15,583**	**15,104**	**10,643**	**77,606**	**261,113**	**365,183**	**1,611,404**	**2,237,700**
	5.2%	**1.2%**	**0.7%**	**0.7%**	**0.5%**	**3.5%**	**11.7%**	**16.3%**	**72.0%**	**100.0%**