

# **Department of Labor and Training Limited English Proficiency (LEP) Plan**

*January 29, 2014*

## **PURPOSE**

The purpose of this Limited English Proficiency (LEP) plan is to clearly delineate how the department's Language Access Policy Directives (DLT Policy 13-1) are to be implemented. The following procedures will be addressed in this document:

- Identification of persons responsible for implementation of a division's LEP policy work
- How divisions will identify and assess LEP needs
- Timeframes, objectives and benchmarks
- Identify funding necessary to fulfill objectives
- Provide meaningful notice of available services
- Procedures for staff training
- Ensuring quality and accurate translations/interpretations
- Monitoring for compliance with the policy/plan
- Collaboration with partners

## **LANGUAGE ACCESS COORDINATOR**

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## **LEP WORKGROUP**

The department established the LEP Workgroup in December, 2013. This group consists of representatives from each division at the department that provides customer service to the public, representatives of the DLT Executive/Legal Offices, the department's Language Access Coordinator and representatives of community groups that have experience and expertise in working with foreign language speaking populations.

In an effort to ensure that community input is sought and provided regarding the department's language access services the department will engage at least two community based groups from diverse backgrounds as members of the LEP Workgroup. Outreach efforts for obtaining input from new or additional groups will be discussed by the LEP Workgroup.

The LEP Workgroup will meet at least biannually to review materials, practices, the Language Access Policy Directives and this LEP Plan.

**DIVISIONAL RESPONSIBILITIES**

The department’s Language Access Policy Directives require the divisions of the department to perform prescribed functions in order to ensure that the department’s goal of providing meaningful access to all customers is fulfilled. The following table identifies the persons responsible for ensuring that all required functions are performed from each applicable division:

<b>Income Support</b> Unemployment Insurance/ Temporary Disability Insurance	<b>Robert Langlais, Assistant Director</b>
<b>Workforce Development Services</b>	<b>Sue Chomka, Assistant Director</b>
<b>Workers’ Compensation</b>	<b>Matthew Carey, Assistant Director</b>
<b>Workforce Regulation &amp; Safety</b>	<b>Joseph Degan, Assistant Director</b>
<b>UI/TDI Board of Review</b>	<b>Raymond Maccarone, Chief Referee</b>
<b>Labor Market Information</b>	<b>Donna Murray, Assistant Director</b>
<b>State Workforce Investment Office</b>	<b>David Tremblay, Administrator</b>

Each of the persons identified above shall assign an EO/LEP Coordinator from their division to work with the department’s Language Access Coordinator. Additionally, they may assign staff to assist in performing the necessary steps to fulfill their divisional responsibilities; however the named individuals will be responsible for ensuring that the requirements have been met.

Each division shall:

- Assign an EO/LEP Coordinator
- Conduct a needs assessment
- Determine capacity for providing services
- Determine which documents are vital
- Translate vital documents into languages other than English
- Ensure access to oral language assistance/translators
- Develop written procedures for serving non-English speakers and LEP persons
- Notify customers as to the availability of services in languages other than English
- Monitor customer access to language assistance

**NEEDS ASSESSMENT**

In order to determine if the department is providing meaningful access to all services for persons with Limited English Proficiency (LEP), a needs assessment shall be conducted. The department will determine the need for services based on information obtained via two methods:

1. Each division will review their work unit's past experience regarding providing language access services. This review will require divisions to compile an inventory of requests for services their division has received in the last 12 months. If this information is not available divisions will poll their customer service/front line staff to gauge their opinion on the perceived need for services in a particular language. Additionally, the review will capture the number of customers served in a particular language by the division. This information will provide a baseline for expected levels of service/need.
2. The Labor Market Information (LMI) division will conduct a review of Rhode Island's population demographics in order to determine the languages that are most frequently utilized by the state population. The division will review data provided by the U.S. Census Bureau to make this determination. U.S. census information will be considered reliable for this purpose.

If the review conducted by the LMI division reveals that a new language is significantly used in Rhode Island the LMI division shall report that information to the Language Access Coordinator. The Language Access Coordinator will subsequently issue a policy notification to each division at DLT that interacts with public customers to make them aware of the need to expand their language access services for that particular language.

## **PROCEDURES**

Each public-facing division at DLT shall develop written procedures for serving non-English speaking and LEP customers. The department's Language Access Coordinator must review and approve all plans before implementation. Plans should address:

## **EFFECTIVE COMMUNICATION**

In order to provide meaningful access to all services that DLT offers, the department must ensure that it communicates effectively with the public. When working with LEP customers, it is imperative that they have a full understanding of the information being discussed. To provide effective communications DLT will translate all vital documents into the languages most frequently used by customers and provide interpreters for in-person and telephone interactions with those customers.

## **WRITTEN TRANSLATIONS**

Vital documents are documents, either written or electronic, that contain information critical for accessing services. Each division of the department shall develop criteria to determine which documents regularly utilized by that division are considered to be vital.

Vital documents shall be provided in the languages most frequently used by DLT customers. In order to ensure that translations are both accurate and effective they will

either be performed by state personnel that have been certified by the RI Division of Human Resources to translate materials in that particular language or DLT staff will procure the services of a professional language translation service. Approved vendors providing these services are available on the state's Master Price Agreement (MPA). Division EO/LEP Coordinators shall request from Assistant Directors that staff perform the service or work with their division's procurement liaison to obtain these services in accordance with all applicable RI purchasing rules. Once the translation service has been provided, divisions shall work with the Division of Information Technology (DoIT) to program the information into all necessary databases/IT programs so that the translated form will be available electronically and distributed to LEP customers. Additionally, divisions shall work with DLT's Marketing and Communications unit to ensure that the translated documents are available on the department's website.

In addition to translating necessary forms and correspondence, DLT shall translate all vital information posted to the department's website. Each division that has information posted on the department's website will utilize the same criteria to identify vital documents as well as specific web materials to be translated. The Marketing and Communications unit will collaborate with the division's EO/LEP Coordinator to perform the necessary functions required to post this information on the department's website.

## ORAL LANGUAGE SERVICES

To ensure that DLT customers have meaningful access to services, DLT employs interpreters for in-person interactions and telephone services. Based on need, department divisions have state personnel that have been certified by the RI Department of Administration, Division of Human Services, as foreign language interpreters. Should a division require interpreter services for a language other than one in which they employ an interpreter, the division shall obtain the services via a professional interpreter service that is duly qualified to provide services in the necessary language. Additionally, should those services not be readily available, divisions may utilize services provided via telephone. Division EO/LEP Coordinators shall work with their division's procurement liaison to obtain these services in accordance with all applicable RI purchasing rules.

### Current Services

Division	Language	State Personnel		Contracted Services	
		Interpreter	Translator	Interpreter	Translator
Income Support	Spanish	x	x	x	x
	Portuguese	x			x
	Cambodian	x			x
	Laotian	x			x
	Hmong	x			x
UI/TDI Board of Review	Spanish	x			x
	Portuguese			x	x
Workforce Development	Spanish	x	x		x

Services					
	Portuguese			X	X
Workers' Compensation	Spanish	X	X		X
	Portuguese			X	X
Workforce Regulation/ Safety	Spanish	X	X		X
	Portuguese			X	X

## **NOTICE OF AVAILABLE SERVICES**

To fulfill DLT's mission of providing meaningful access to all services for persons with Limited English Proficiency, the department must provide notice to the public of all available language access services. To accomplish this, the divisional EO/LEP Coordinators will:

- Work with the Marketing and Communications unit to draft the copy for the notice and design the document
- Procure necessary translation services utilizing approved MPA vendors
- Post the notices to the DLT website
- Post the notices in each of the DLT public service offices/areas

## **LEP FLYER**

The Marketing and Communications unit will develop an LEP flyer to be publicly posted and made available for all DLT customers. The flyer will be available in the languages that are most significantly used by DLT customers.

## **FUNDING FOR LANGUAGE ACCESS SERVICES**

The department's divisions are funded either via federal grants, restricted receipt accounts or general revenue appropriations. Each division has resources available in their budget to provide the language access services described in this plan. Funds are budgeted at the previous year's level of service and with flexibility should additional services be needed.

## **STAFF TRAINING**

The Language Access Coordinator is responsible for developing a training guide on the department's language access services. This guide will be reviewed by the LEP Workgroup before utilization.

The Language Access Coordinator will conduct training with divisional EO/LEP Coordinators that will cover the following:

- General information about working with non-English speaking or LEP customers
- LEP customer rights
- DLT's Language Access Policy Directives
- DLT's responsibilities to provide services

In order to ensure that all department staff that interacts with the public receives the appropriate training, the Language Access Coordinator will assist divisional EO/LEP Coordinators in developing division-specific training guides. Divisional EO/LEP Coordinators will be responsible for training the managers in their divisions. Managers will train their staff utilizing the divisional training guide.

All training will be conducted utilizing training guides that have been approved by the Language Access Coordinator. Additionally, divisional EO/LEP Coordinators shall track all training conducted in their division and report that information to the Language Access Coordinator.

## **MONITORING/EVALUATION**

The department will formally evaluate this LEP Plan biannually, in January and July. This evaluation will be conducted by the LEP Workgroup. The process will entail a thorough review of:

- Updated information from LMI regarding new population demographics and new significant languages used by Rhode Island residents
- All processes to evaluate their effectiveness in providing language access services to non-English speaking or LEP customers
- Training protocols

On an ongoing basis, division EO/LEP Coordinators are responsible for regular review of the plan and the language access services provided to customers of their division. It is the responsibility of each division's assistant director to ensure that their division continues to adhere to the department's Language Access Policy Directives and this plan. Formal changes to the plan must be coordinated with the department's Language Access Coordinator and will be reviewed by the LEP Workgroup before implementation.

Periodic monitoring will be conducted by the State Workforce Investment Office to ensure that the procedures in this plan are being adhered to and that services are readily available as required.

## **TIMEFRAMES/OBJECTIVES**

### **Income Support Division**

Unemployment Insurance/Temporary Disability Insurance

Robert Langlais, Assistant Director

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	Asst. Dir.	Asst. Director
Conduct needs assessment	March 2014	EO/LEP Coord.	Asst. Director
Develop written procedures	April 2014	EO/LEP Coord.	Asst. Director
Determine vital documents	March/April 2014	EO/LEP Coord.	Asst. Director
Translate vital documents into Spanish and Portuguese	March/April 2014	EO/LEP Coord.	Asst. Director
Notify customers of availability of language services	April 2014	EO/LEP Coord.	Asst. Director
Staff training	April 2014/ ongoing	EO/LEP Coord.	Asst. Director
Monitor for ongoing compliance/changes in service requests	Ongoing	EO/LEP Coord.	Asst. Director
		SWIO	Administrator

### **UI/TDI Board of Review**

Raymond Maccarone, Chief Referee

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	Chief Referee	Chief Referee
Conduct needs assessment	March 2014	EO/LEP Coord.	Chief Referee
Develop written procedures	April 2014	EO/LEP Coord.	Chief Referee
Determine vital documents	March/April 2014	EO/LEP Coord.	Chief Referee
Translate vital documents into Spanish and Portuguese	March/April 2014	EO/LEP Coord.	Chief Referee
Notify customers of availability of language services	April 2014	EO/LEP Coord.	Chief Referee
Staff training	April 2014/ ongoing	EO/LEP Coord.	Chief Referee
Monitor for ongoing compliance/changes in service requests	Ongoing	EO/LEP Coord.	Chief Referee
		SWIO	Administrator

**Workforce Development Services Division**

Sue Chomka, Assistant Director

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	Asst. Dir.	Asst. Director
Conduct needs assessment	February 2014	EO/LEP Coord.	Asst. Director
Develop written procedures	March 2014	EO/LEP Coord.	Asst. Director
Determine vital documents	March/April 2014	EO/LEP Coord.	Asst. Director
Translate vital documents into Spanish and Portuguese	March/April 2014	EO/LEP Coord.	Asst. Director
Notify customers of availability of language services	April 2014	EO/LEP Coord.	Asst. Director
Staff training	April 2014/ ongoing	EO/LEP Coord.	Asst. Director
Monitor for ongoing compliance/changes in service requests	Ongoing	EO/LEP Coord.	Asst. Director
		SWIO	Administrator

**Workers' Compensation Division**

Matthew Carey, Assistant Director

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	Asst. Dir.	Asst. Director
Conduct needs assessment	February 2014	EO/LEP Coord.	Asst. Director
Develop written procedures	March 2014	EO/LEP Coord.	Asst. Director
Determine vital documents	March/April 2014	EO/LEP Coord.	Asst. Director
Translate vital documents into Spanish and Portuguese	March/April 2014	EO/LEP Coord.	Asst. Director
Notify customers of availability of language services	April 2014	EO/LEP Coord.	Asst. Director
Staff training	April 2014/ ongoing	EO/LEP Coord.	Asst. Director
Monitor for ongoing compliance/changes in service requests	Ongoing	EO/LEP Coord.	Asst. Director
		SWIO	Administrator

**Workforce Regulation and Safety Division**

Joseph Degnan, Assistant Director

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	Asst. Dir.	Asst. Director
Conduct needs assessment	February 2014	EO/LEP Coord.	Asst. Director
Develop written procedures	March 2014	EO/LEP Coord.	Asst. Director
Determine vital documents	March/April 2014	EO/LEP Coord.	Asst. Director
Translate vital documents into Spanish and Portuguese	March/April 2014	EO/LEP Coord.	Asst. Director
Notify customers of availability of language services	April 2014	EO/LEP Coord.	Asst. Director
Staff training	April 2014/ ongoing	EO/LEP Coord.	Asst. Director
Monitor for ongoing compliance/changes in service requests	Ongoing	EO/LEP Coord.	Asst. Director
		SWIO	Administrator

**Marketing and Communications Unit**

<b>Action Item</b>	<b>Timeframe/ Completion</b>	<b>Party Responsible</b>	<b>Party Accountable</b>
Assign EO/LEP Coordinator	January 2014	LAC	LAC
Work with divisions/units to draft written procedures	February - April 2014	EO/LEP Coord.	LAC
Post notice of language services online	Ongoing	EO/LEP Coord.	LAC
Develop LEP Flyer	March 2014	EO/LEP Coord.	LAC
Develop posters re: - notice of language services - LEP flyer	March 2014	EO/LEP Coord.	LAC