



Montgomery County Workforce Development Board

Language Access Plan for Individuals with Limited English Proficiency

Purpose: The purpose of this document is to establish a meaningful plan for the Montgomery County Workforce Development Board (MontcoWorks) to follow when administering services and interacting with individuals who have limited English proficiency (LEP) in compliance with Title VI of the Civil Rights Act of 1964. This law stipulates that no person shall be subjected to discrimination based on race, color or national origin under any program or activity that receives Federal financial assistance. All programming administered by MontcoWorks including, but not limited to, the PA CareerLink® Montgomery County, the Employment Advancement & Retention Network (EARN), MontcoWorks*NOW, Temporary Assistance for Needy Families (TANF) Youth Development program, and other funded provider partners have a shared goal of providing high quality and equitable services to all residents of Montgomery County. In order to ensure that all individuals have equitable access, MontcoWorks is implementing this plan specific to those with limited English proficiency.

Four-factor Analysis: The foundation of a language access plan that provides meaningful access for limited English proficient persons is based on the four-factor analysis which starts with an individualized assessment that balances four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP individuals come into contact with the program; (3) the nature and importance of the program, activity or service provided by the recipient to its beneficiaries; and (4) the resources available to the grantee/recipient and the costs of interpretation/translation services.

1. The number or proportion of LEP persons in the service area who may be served or are likely to require MontcoWorks services:
 - MontcoWorks staff reviewed the US Census Bureau’s 2020 American Community Survey 5-Year Estimates for Montgomery County and determined that:
 - 108,411 individuals over the age of five in Montgomery County, comprising 13.9% of the population, speak a language other than English at home¹;
 - Of those, 35,806 individuals have limited English proficiency; that is, they speak English less than “very well.” This is 4.6 % of the overall population in the service area over the age of five²;

¹ US Census Bureau 2020 ACS 5-Year Estimates – DP02

² US Census Bureau 2020 ACS 5-Year Estimates – DP02

- In Montgomery County, of those persons with limited English proficiency, that report speaking English less than “very well”³:

- 1.16% speak Spanish
- 0.84% speak Other Indo-European languages
- 0.63% speak Korean
- 0.53% speak Chinese (including Mandarin and Cantonese)
- 0.34% speak other Asian and Pacific Island languages
- 0.33% speak Vietnamese
- 0.29% speak Russian, Polish, or other Slavic languages
- 0.13% speak Arabic
- 0.11% speak French, Haitian, or Creole
- 0.05% speak German or other West Germanic languages
- 0.07% speak Tagalog (including Filipino)
- 0.11% speak other and unspecified language

2. The frequency with which LEP persons come in contact with MontcoWorks administered programs and services
 - MontcoWorks reviewed the frequency with which their staff have, or potentially have, contact with LEP persons. This includes documenting phone inquiries or office visits.
 - To date, MontcoWorks administered programs have had 5 requests for interpreters and 0 requests for translated program documents as follows:
 - 3 individuals have requested Spanish interpreters
 - 2 individuals have requested American Sign Language interpreters
3. The nature and importance of services provided through MontcoWorks administered programming to the LEP population
 - The overwhelming majority of the population over the age of five, 86.13%, speaks only English⁴. There are few social, service, or professional and leadership organizations within the MontcoWorks service area that focuses on outreach to LEP individuals including a key partner, ACLAMO. MontcoWorks and its contracted staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from department staff regarding the results of service delivery, and attendance and participation at public meetings.
4. The resources available to MontcoWorks, and overall cost to provide LEP assistance
 - MontcoWorks continually reviews its available resources that could be used to provide LEP assistance and inventoried its documents to determine which are suitable for translation if the need arises.

³ US Census Bureau 2020 ACS 5-Year Estimates – C16001

⁴ US Census Bureau 2020 ACS 5-Year Estimates – C16001

- MontcoWorks has contracted providers with bi-lingual staff as well as a provider with a bi-lingual staff “bank” that covers 36 different languages that can provide language translation and interpretation services if needed within a reasonable time period. Other language translation options are provided through Proprio language services which is covered by the PA CareerLink[®] Montgomery County. Google Translate is an additional free service that can be helpful when translation is needed for documents or websites.

Elements of an Effective Plan: In developing this language assistance plan for Limited English Proficient (LEP) persons, MontcoWorks has considered the following criteria based on the [elements of an effective plan as established by the Pennsylvania Department of Labor & Industry](#):

- Identifying LEP Individuals Who Need Language Assistance
- Language Assistance Measures
- Training Staff
- Providing Notice to LEP Persons
- Monitoring and Updating the LEP Plan

Identifying LEP Individuals Who Need Language Assistance: As the first step in identifying LEP individuals, MontcoWorks reviews data from the United States Census to establish a baseline need for language assistance within Montgomery County. According to the US Census Bureau’s American Community Survey 2020 5-year estimates, 4.6% of Montgomery County residents over the age of five reported speaking English “less than very well”. Other than English, Spanish is the most commonly spoken language among Montgomery county residents. With an estimated population of 781,831 over the age of five, 1.16% are Spanish speaking individuals that reported speaking English “less than very well”⁵. While this falls under the 5% federal threshold for translation of vital documents, bi-lingual (Spanish/English) staff are available to provide interpretation and translation when necessary and if bi-lingual staff are not available, staff will make the connection for services through Proprio. As a way to identify those needing LEP language assistance on-site, when customers or participants enter a MontcoWorks administered program, and are unable to communicate their needs to staff, they have two options to identify their primary language. Reception staff are equipped with a Language Identification Flashcard that enables the individual to point to their preferred language. All reception areas now also have a posted Babel Notice to inform individuals of vital information in the 10 most frequently spoken languages in Montgomery County.

Language Assistance Measures: MontcoWorks takes measures to ensure the administration of programming that provides meaningful communication and access to services to individuals with limited English proficiency. If individuals present with needs that are not supported by the

⁵ US Census Bureau 2020 ACS 5-Year Estimates – S1601

following options, MontcoWorks will seek additional services to afford equitable access to services.

- Direct service delivery in the individual’s primary language by bi-lingual provider staff
- Verbal and Document translation in the individual’s primary language
- In-person or virtual interpretation services through Proprio
- In-person or virtual sign language interpretation through Purple

The procurement of Purple in 2022 has afforded deaf and hard of hearing individuals the opportunity to effectively communicate with staff and providers real-time. Staff does not require, suggest or encourage LEP individuals or families to use friends, family members or minor children as interpreters. If an LEP individual or family insists that a friend or family member serve as interpreter, staff will document that choice and on a case by case basis, consider factors such as: competence of the family or friend used as the interpreter; the appropriateness of the use in light of the circumstances and ability to provide quality and accurate information, especially if the interview could result in a negative effect on the individual or family's eligibility for benefits or services; potential or actual conflicts of interest; and confidentiality of the information being interpreted to determine whether staff should provide its own independent interpreter.

Training Staff: All staff connected to MontcoWorks administered programs are required to participate in routine Equal Opportunity and non-discrimination training throughout the year which includes a training session on providing meaningful services to individuals with limited English proficiency. This LEP plan will be reviewed annually for updates to demographics, resources and services and all staff will undergo a training session to review the plan to ensure equitable access to services for all individuals, regardless of their primary language through translation, interpretation and other relevant means.

Providing Notice to LEP Persons: MontcoWorks provides notice to LEP individuals to increase awareness to available services.

- A Babel notice is included in each program’s orientation packet and is posted in each program’s reception area, and on the [MontcoWorks Equal Opportunity webpage](#).
- The MontcoWorks Equal Opportunity webpage also includes the following: “Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities. This includes providing language services to limited English proficient individuals at no cost.”
- MontcoWorks has close partnerships with the two Montgomery County Title II providers, the YWCA Tri-County and the Keystone Opportunity Center. Both entities provide in-depth Title II services including basic skills, high-school equivalency,

MontcoWorks is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

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English-language learning and citizenship. These partnerships afford the ability for mutual referrals as well as promotion of services.

- MontcoWorks contracts with ACLAMO to provide youth and young adult services through the TANF Youth Development Program. ACLAMO is a nonprofit community service organization that provides educational programs, social services, and access to health and wellness programs to Latinos and other community members to empower them to fully achieve their life potential. This partnership helps promote MontcoWorks administered programs and services to individuals with limited English proficiency.

Monitoring and Updating the LEP Plan: MontcoWorks' Equal Opportunity Officer will review this plan annually, before the start of the new Program Year, to stay current with changing demographics provided by the US Census Bureau as well as available demographic information in the system of record. The annual review will look at existing services and resources to ensure they are functioning in a manner that promotes equitable access. Additional services, technological advances, new methods, best practices, or other resources that may benefit Montgomery County residents with limited English proficiency will also be reviewed. At the start of each new program year, after this plan is reviewed and/or updated, training will be held for all staff to ensure knowledge is current and in line with the plan. Additionally, the Accommodation Tracking Log that includes language assistance requests will be reviewed twice per year to ensure individuals are receiving appropriate assistance while also monitoring any trends with emerging language needs.

MontcoWorks will continue creating and enhancing relationships with community partners that can assist in accommodating individuals with limited English proficiency to ensure equity, diversity and inclusion for all residents of Montgomery County.