

the most frequently encountered languages. When LEP clients request services in less frequently encountered languages, a commercial telephone interpretation service is provided. Ten percent of the city's population is LEP, and sixty percent of the LEP population speaks Spanish. The One-Stop Career Center has many Spanish-speaking staff and a few staff that speak other languages. Forms are translated into Spanish. The recipient provides services to other non-English-speaking clients using a language bank, comprised of volunteers and bilingual staff employed by other Government entities who are competent translators and/or interpreters. This example may be one appropriate way of providing meaningful access for LEP individuals.

Example: A small One-Stop Career Center is operated by a recipient of DOL funds and located in an area where 15 percent of the population speak Spanish and may be LEP. Seven percent of the population in the service area speak various Chinese dialects and may be LEP. The One-Stop Career Center uses competent community volunteers to help translate vital outreach materials into Chinese (which is one written language despite many dialects) and Spanish. The One-Stop Career Center telephone system has a menu providing key information, such as location, in English, Spanish, and two of the most common Chinese dialects. Calls for immediate assistance are handled by bilingual staff. The One-Stop Career Center has one counselor and several volunteers fluent in Spanish and English. Some volunteers are fluent in different Chinese dialects and in English. The One-Stop Career Center works with community groups to access interpreters in the several Chinese dialects that they encounter. One-Stop Career Center staff train the community volunteers in the intake process and the specialized vocabulary needed to explain the services available. Volunteers sign confidentiality agreements. The One-Stop Career Center is looking for a grant to increase its language capabilities despite its limited resources. There have been no complaints of delayed or denied service on account of language barriers. This example may be one appropriate way of providing meaningful access for LEP individuals.

b. Delivering Labor Exchange Services

Currently, labor exchange services are being delivered through a wide variety of media, both electronic and paper-based. However, state and local workforce agencies are increasingly relying on Internet-based, self-help models of service delivery. While this method of service has the potential of benefiting the greatest number of job seekers while minimizing staff resources, key segments of the population are potentially excluded. Persons with limited language and literacy skills often have extra difficulty accessing services through the self-help, Internet-based systems. As such, a service plan is needed to develop alternative delivery systems. This can be done through incorporating one or more of the following strategies: (1) Having certain information translated; (2) incorporating a sufficient level of staff assistance to serve those persons that

need assistance in accessing services electronically; or (3) providing direct one-on-one sessions with LEP applicants who are unable to access electronic information.

Example: A One-Stop Career Center in a moderately large city includes significant LEP populations whose native languages are Spanish, Korean, and Tagalog. One-Stop Career Center management officials could reasonably consider creating a resource list of individuals competent to interpret and ready to assist front-line staff dealing with LEP customers. This could be combined with developing language-appropriate written materials, such as an explanation of basic labor exchange activities and other services available at the One-Stop Career Center for use by LEP individuals who are literate in those languages. In other circumstances, it may be necessary to provide access to a telephone interpretation service.

Example: Job placement staff at a One-Stop Career Center assist employers interested in hiring LEP individuals who have completed ESL vocational training. In some instances, employers may have bilingual supervisors who can assure that safety precautions and explanations are provided in the individuals' primary language(s). In other locations, "ethnic" community-based organizations maintain lists of employers who have openings and are able to place LEP individuals without providing ESL or vocational training with businesses where the LEP individuals' primary language(s) is spoken. This example may be one appropriate way of providing meaningful access for LEP individuals.

Example: A large state, with an ethnically diverse population, operates a website as part of its overall delivery system which offers access to labor market information and provides labor exchange self-service for job seekers and employers. Because of the scope and reach of the Internet, the population eligible to be served by that website may easily include LEP individuals representing over 100 different languages. In this instance, the state translates key documents and forms on its website into the most significant languages, e.g., representing five percent or more of the total eligible population to be served, and advertises its toll-free help line, which includes interpretation services, on the homepage of its website. Through the combination of its toll-free help line and its in-office delivery system, the state is able to provide information and services to LEPs in languages that are less commonly encountered. In this instance, the recipient takes into account, in conducting its four-factor analysis, its entire delivery system, not just one component. This example may be one appropriate way of providing meaningful access for LEP individuals.

c. Delivering Unemployment Insurance (UI) Services

The federal-state UI program created by the Social Security Act of 1935, offers the first line of defense against the ripple effects of unemployment. Payments made directly to eligible, unemployed workers ensure that at least a significant proportion of the necessities of life, most notably food, shelter and clothing, can be met on a week-to-week

basis while the claimant searches for work. UI benefits provide temporary wage replacement that helps claimants to maintain their purchasing power and stabilize the economy.

(1). Initial Claims and Follow-Up Notices

State agencies that serve LEP claimants should consider the inherent communication impediments to gathering information from LEP persons throughout the UI claims process. During the initial claim process, it is necessary to collect basic information, such as the LEP person's name, address, employment information, and reason for separation from employment. It is also necessary to communicate with claimants throughout the life of their claims, and workforce agencies should evaluate their ability to provide appropriate services at all stages of the UI claim. Where few bilingual staff are available or in situations where the LEP person speaks a language not frequently encountered in the local area, telephone interpretation services may provide the most cost effective and efficient method of communication during the initial claim. However, subsequent correspondence and communication frequently entail written notices and claim forms. Depending on the size of the LEP population, it may be necessary to translate vital forms into other languages or to include a multilingual tag-line on correspondence not appropriately translated to inform claimants that free language services are available.

Example: A state agency operates a statewide Call Center for UI initial claims taking that receives 100,000 calls per year. The majority of the calls are from English speakers. Fifteen percent of the callers (15,000) do not speak English: 6,500 callers speak Spanish; 4,000 speak Vietnamese; 3,500 speak Cambodian; and the rest speak other languages (500 Russian, 100 French, 80 Tagalog, 20 German, and 300 speak other languages). The Call Center employs four Spanish speakers, two Vietnamese speakers and two Cambodian speakers. A voice response system directs the calls as appropriate to the bilingual staff. Calls from LEP claimants speaking other languages are directed to a commercial interpretation (telephone interpretation) service. The Call Center's bilingual employees are able to handle most calls from the three significant LEP language groups that they serve. Callers who speak English and any of the three languages for which translation is provided generally wait no longer than five minutes to speak with the staff. The system is monitored for wait times and performance. Follow-up correspondence such as letters, notices, and forms contain a tag-line in the languages of the three significant LEP groups and three other commonly encountered languages. The tag-line advises individuals of the importance of the information and provides a phone number to call for assistance. This example may be one appropriate way of providing meaningful access for LEP individuals.

(2). UI Benefits Rights Information (BRI)

State agencies provide UI benefits rights information to all claimants. The information is necessary to ensure that claimants