



EMPLOY MILWAUKEE POLICY 20-05, Change 1

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SUBJECT: LIMITED ENGLISH PROFICIENCY

ISSUANCE DATE: 08/27/26

EFFECTIVE DATE: 08/27/26

REVIEWED DATE: Not applicable

REFERENCES:

- Title VI of the Civil Rights Act of 1964
- 29 CFR §38.31(f)
- 29 CFR § 38.41(b)(2)
- 29 CFR § 38.9
- WIOA Section 188

POLICY SCOPE

- ☒ EMPLOY MILWAUKEE AGENCY
- ☒ WIOA WDA 2 SYSTEM
- ☒ WIOA TITLE I-B PROGRAM(S)
 - ☒ ADULT PROGRAM
 - ☒ DISLOCATED WORKER PROGRAM
 - ☒ YOUTH PROGRAM
- ☒ NON-WIOA PROGRAMS
- ☒ RE ENTRY PROGRAMS

I. BACKGROUND

Employ Milwaukee, Inc. is committed to providing equal opportunity in all programs, services and activities to individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. Those individuals are referred to as limited English proficient, or "LEP." Meaningful access to Federally funded programs and activities is required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

II. PURPOSE

Employ Milwaukee is responsible for ensuring meaningful access and effective communication at all times.

III. POLICY

Meaningful access to LEP individuals is provided in two ways: Oral interpretation and written translation. Oral interpretation can range from on-site interpreters for critical services provided to a high volume of LEP persons, to access through commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document.

The entity fulfills this obligation by one or more of the following: hiring bilingual staff, hiring staff interpreters/translators, contracting for interpreters/translation services, using telephone interpreter lines, and/or using community volunteers. The entity understands that the interpretation/translation must be performed in a competent, confidential, ethical, and accurate manner at no cost to the LEP individual. The entity does not rely on the LEP individual to provide an interpreter.

If an LEP person requests to use a family member, friend or other adult as an interpreter, the entity makes the LEP person aware that the entity will provide a qualified interpreter at no cost to the LEP person. The entity respects the LEP person's choice of interpreters. If the LEP person chooses a family member, friend, or other adult to interpret instead of one provided by the entity, the entity makes a record of that decision. If the entity believes the interpreter selected by the LEP person is not competent or appropriate, the entity supplements with its own qualified

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interpreter. Minors should not act as interpreters unless there is an emergency situation and another interpreter is not immediately available.

The entity records the number and date of instances in which interpretation was offered, what service was offered (e.g., staff, in-person contracted, telephone, etc.), whether it was accepted or whether the LEP individual selected their own interpreter, and in what language group the service was needed.

This entity monitors its changing demographics and population trends on an annual basis, to ensure awareness of the language needs in its service area.

The entity requires its subrecipients to comply with the LEP policies requirements.

To assist us in complying with all applicable limited English proficiency rules, regulations and guidelines, the Employ Milwaukee, Inc. LEP Coordinator is: **Carrie Hersh, LEP Coordinator Phone: 414-270-1726.**

LEP customers are encouraged to ask for language assistance or discuss any perceived discrimination problems with the LEP Coordinator. Information about discrimination, complaint resolution process is available upon request.

IV. PROCEDURES

See Procedure Addendum attached.

V. ACTION REQUIRED

- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.

REVISIONS: 20.05 Limited English Proficiency

BOARD APPROVAL DATE: 08/27/2026

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Policy 20.05 – Language Access Procedures Addendum

I. Purpose

This addendum establishes procedures to ensure compliance with WIOA Section 188 and 29 CFR Part 38 and operationalizes Policy 20.05.

II. LEP Identification and Preferred Language Documentation

Staff must determine LEP status, document preferred spoken and written language, update preferences, and record in all funder mandated systems and case notes.

- If the individual has LEP, qualified interpreter services are the default method of communication and must be provided in a timely manner unless unavailable or explicitly declined by the participant.
- If an accompanying adult is requested, complete the ***Accompanying Adult Interpreter Request and Acknowledgement*** form
- Save the form(s) in the participant's file.
- Enter/update language preferences in all funder mandated systems, including electronic and paper records where applicable.
- Notify program staff and training and other service providers if interpreter services will be needed for future appointments.
- Provide vital documents translated into the participant's preferred language, as required.
- Document in case notes:
 - Preferred language
 - LEP status
 - Interpreter arrangements (staff, contracted, telephonic, etc.)

III. Provision of Language Assistance Services

Qualified interpreter services must be offered at no cost. Interpretation must be competent, confidential, timely, and appropriate. Vital information must be communicated in an understandable language.

IV. Use of Accompanying Adults as Interpreters

An accompanying adult may only be used if requested by the participant, in non-emergency situations. Staff must document the request and still ensure effective communication. Minors may not interpret except in emergencies.

V. Staff Training Requirements

Staff must receive initial and ongoing training on LEP identification, interpreter use, documentation, and compliance responsibilities.

VI. Documentation and Recordkeeping

Programs must document LEP status, preferred language, interpreter services, and retain records in alignment with Employ Milwaukee's policy 21.03 Local Records Retention.

VII. Ongoing Monitoring and Compliance

Language needs are monitored annually by Employ Milwaukee and services are adjusted if needed. Subrecipients must comply with the most current requirements.