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Office of
Compliance
Issuance

29-2026

Release Number-Program Year

Active Date: 03/19/2026

Effective Date: 03/19/2026

Expiration Date: Continuous, until further notice

Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

Access to Meaningful Services for Individuals with Limited English Proficiency (LEP) Policy

ATTACHMENTS (if any): N/A

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
- Title I: Adult
- Title I: Dislocated Worker
- Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this issuance is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

OWD Issuance – Section 188 of WIOA Access to Meaningful Services for Individuals with Limited English Proficiency (LEP) Policy

SUMMARY

The policy is to ensure STLCOWD's Workforce staff effectively communicates and provide meaningful access to individuals with limited English proficiency (LEP).

BACKGROUND

This policy provides guidelines STLCOWD to provide guidelines and meaningful access for individuals with LEP. No person shall be denied access to any WIOA program, activity, or service because they do not speak English or communicate in English on a limited basis.

SUBSTANCE

STLCOWD ensures LEP have meaningful access to programs and services regardless of an individual's ability to speak, read, write, or understand English.

A. Language Assistance Plan

1. "Your Right to an Interpreter" - workforce staff must inform all LEP individuals of their right to timely and complimentary interpreter services. "Your Right to an Interpreter" posters are prominently displayed at STLCOWD informing individual in English and other primary languages "You have the right to an interpreter at no cost to you. Please point to your language.
2. "Point to your language" posters. Workforce staff may distribute the cards to assist individuals with LEP in selecting a language needed for an interpreter.
3. "Notice of Right to Language Assistance" – this notice provides LEP their right to an interpreter at STLCOWD.
4. Telephone Interpreter Service An interpreter will be called. Please wait." The poster informs LEP speakers of their right to an interpreter at STLCOWD. Competent interpreters will be used to provide effective services to LEP individuals. Interpreters will have demonstrated proficiency in both English and the intended language. The Office of Administration maintains statewide contracts with qualified vendors of spoken language interpreter services. In-person, videoconferencing, and telephone interpreting services are available.855-295-9177

The State of Missouri's Language Line Services provides telephone interpretation in over 240 languages. Staff will use Language Line Services when bilingual staff are not available, when the language is one not commonly encountered in Missouri, or when staff are not sure what language an individual speaks.

B. General Individual Service Requirements

1. Verify individual identity – before releasing case-specific information, staff must verify the identity of the individual through the help of bilingual staff, Language Line

Services staff, or vendors providing interpretation or translation services assist making verifications.

2. Document the use of interpreter in the individual's file or when an individual makes use of another form of language assistance.
3. Workforce staff must not use minor children as interpreters.
4. In-person interpreter services workforce staff will arrange to have an interpreter available at a time and place that is convenient for both the interpreter and the individual. Staff may arrange for in-person interpreting by contacting vendors directly.
5. Protection of confidentiality and accuracy of interpretation will always be of the highest concern.
6. Free interpreter services will always be offered, as an individual may not be aware of interpreter services.
7. If an individual prefers to have a family member or friend serve as an interpreter, ask if the individual will allow a trained interpreter to listen in to ensure accuracy of interpretation. If the offer is refused, document the offer and refusal and accommodate the individual's wishes.
8. STLCOWD contracted interpreters or bilingual staff should be used in circumstances when an individual is giving information that may negatively affect his/her eligibility for services.
9. STLCOWD contracted interpreters or bilingual staff are preferred in situations where an individual must answer complicated or detailed questions. If family or friends handle the interpreting, follow-up calls or letters should be done by bilingual staff, Language Line Services staff, or contractors.
10. Uncommon languages – when interpreter services are needed for a language not commonly spoken in Missouri, staff should notify STLCOWD's Executive Director for additional information to assist with servicing an individual.

C. Utilizing Bilingual Staff

Bilingual workforce staff can be used to ensure meaningful access by communicating directly in the individual's primary language. Many individuals have some proficiency in more than one language but are not bilingual. These staff may be able to greet a LEP individual in his or her language but, not provide services in that language.

The skill level and training of bilingual workforce staff should be evaluated to determine whether the skill of an interpreter or translator is required when providing services.

D. Emergencies

When programs or the assistance requested require immediate action, workforce staff must take the necessary steps to ensure all individuals, including individuals with LEP, have access to services or information within the appropriate time frames.

E. Translating Requirements for Documents

Vital information is needed to meet eligibility and enrollment. Vital information is necessary for an individual to obtain any aid, benefit, services, and/or training; or required by law as whether written, oral, or electronic. Examples of documents containing vital information that can/should be translated include, but are not limited to:

- Applications
- Consent and complaint forms
- Notices of rights and responsibilities
- Notices advising LEP individuals of their rights and availability of free language assistance
- Written tests that do not assess English language competency, or skill for which English proficiency is not required
- Letters or notices that require a response from the beneficiary or applicant, individual or employee.

Babel notices are short notices included in a document or electronic medium (web site, app, email) in multiple languages informing the reader that communication contains vital information and explains how to access language services. This service is available at STLCOWD.

F. LEP Training for Workforce Staff

STLCOWD will provide ongoing training and education to workforce staff to increase awareness of LEP policies and procedures.

G. LEP Data Collection

STLCOWD must keep record of LEP and the preferred language of each applicant, registrant, individual, and terminée.

H. COMPLAINT

A discrimination complaint must be filed within 180 days of the violation. The following is STLCOWD's suggested procedures for filing a complaint:

1. Contact STLCOWD's Local EO Officer:

a. Stacey Garner

Location: St. Louis County Job Center- MET Center

6347 Plymouth Avenue

St. Louis, MO 63133

Phone: 314-406-0175

Email: Stacey.Garner@dhewd.gov

or

2. Contact the State of Missouri EO Officer or The Director, Civil Rights Center (CRC):

a. Danielle Smith
State WIOA Equal Opportunity Officer
Location: P.O. Box 1087
Jefferson City, MO 65102-1087
Phone: 573-751-2428
TTY: 800-735-2966 (or 711)
Fax: 573-751-4088
Email: danielle.smith@dhewd.mo.gov

or

b. The Director, Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue NW Room N-4123
Washington, DC 20210
www.dol.gov/crc (electronic submission)

TIMELINE

Immediate and continuous

INQUIRIES

Please direct all questions or comments regarding this Issuance document to compliance@fwca-stl.com. All active, expired, or rescinded Issuances are available upon request.