

Language Access Plan

**DIVISION OF WORKFORCE DEVELOPMENT AND
ADULT LEARNING**

DIVISION OF UNEMPLOYMENT INSURANCE

NOTE: This is a DWDAL & DUI **draft** Language Access Plan,
which is pending inclusion in the DLLR-wide LAP. (1/19/18)



2018

Table of Contents

INTRODUCTION	2
RELEVANT DEFINITIONS AND ACRONYMS	2
BACKGROUND	3
PURPOSE	4
DIVISION ROLES	5
Division of Workforce Development and Adult Learning	5
Division of Unemployment Insurance	6
STAKEHOLDER CONSULTATION	6
CURRENT DATA AND PROMISING PRACTICES	8
Language Diversity in Maryland	8
Points of Contact with Customer Population	9
DLLR WIOA Title II Adult Education Grantee Sites Offering ESL	9
DUI Claim Centers and Appeals Division	9
The American Job Center Network	9
Office of Fair Practices (OFP)	10
Language Resources Available at DWDAL and DUI	10
Maryland's Skilled Immigrant Task Force	15
LANGUAGE ACCESS PLAN: UPDATED PRACTICES	16
Needs and Capacity Assessment	16
Oral Interpretation Services	19
Multilingual Staff or Volunteers	20
Telephone Interpretation Services	21
Certified In-Person Interpreters	22
Vital Documents Translation	23
Definitions and Explanations	23
Identification and Determination Procedures	25
Translation Services	25
Identifying LEP Status and Notification of Language Assistance Services	26
Guidelines and Procedures for Serving LEP Individuals	27
Monitoring Language Access	28
Staff Training	29
Language and LEP Data Collection	30
Language Access Coordinators	30
Allocation of Resources to Implement this LAP	31
APPENDICES	32

INTRODUCTION

The Office of the Assistant Secretary for the Division of Workforce Development and Adult Learning (DWDAL) at Maryland's Department of Labor, Licensing and Regulation (DLLR) collaboratively developed this Language Access Plan (LAP) with input from DLLR's Division of Unemployment Insurance (DUI) and Local Workforce Development Areas (LWDAs), and guidance from DLLR's Office of Fair Practices (OFP).

This Plan identifies how DWDAL and the statewide network of American Job Centers (AJCs), as well as Maryland's DUI system, are working to ensure and improve service access for Limited English Proficiency (LEP) individuals.

RELEVANT DEFINITIONS AND ACRONYMS

Below is list of defined terms:

Babel Notice: A short tag line added to a document that advises non-English speakers who they may contact to receive the information in their preferred language; these excerpts should briefly explain that the information is important and should include a telephone number or website.

Limited English Proficiency (LEP): Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled language assistance with respect to a particular type of service, benefit, or encounter¹.

Statutory languages: Languages identified in a particular area that constitute those spoken by 3% or more of the local population.²

Below is list of commonly referenced acronyms:

AJC- American Job Center

DBM- Department of Budget and Management

DLLR- Department of Labor, Licensing and Regulation

DUI- Division of Unemployment Insurance

DWDAL- Division of Workforce Development and Adult Learning

ESL- English as a Second Language

LAP- Language Access Plan

LDSS- Local Departments of Social Services

LEP- Limited English Proficiency

¹ LEP.gov

² Md. State Government Code Ann. §10-1103(b)

LWDA-Local Workforce Development Area

MORA- Maryland Office for Refugees and Asylees (Department of Human Services)

OFP- Office of Fair Practices (DLLR)

RSA- Resource Sharing Agreement

SOPs- Standard Operating Procedures

SWOT- Strengths, Weaknesses, Opportunities, and Threats

WIOA- Workforce Innovation and Opportunity Act

BACKGROUND

This LAP is established pursuant to and in accordance with DLLR OFP's (draft) *LEP Plan*, the Workforce Innovation and Opportunity Act (WIOA), and the Code of Maryland. It is available online here: [{Insert link}](#)

DLLR OFP's (draft) *LEP Plan* was updated in 2017 in accordance with Executive Order 13166 and the U.S. Department of Justice's Policy Guidance Document "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With Limited English Proficiency." OFP developed the (draft) *LEP Plan* as general guidance for all six Divisions and Commissions within DLLR with the following goal regarding service to this population:

*DLLR shall provide quality language assistance services to individuals with limited English proficiency in a timely manner, to ensure meaningful access to programs, services, and activities. The purpose of this LEP Plan is not to create new services but to eliminate or reduce limited English proficiency as a barrier or impediment to accessing DLLR's core services.*³

As the State's Agency responsible for the implementation of WIOA, DLLR drafted this LAP in consultation with partners to comply with WIOA Section 188 which prohibits discrimination against all individuals in the United State on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I financially assisted program or activity.⁴

Additionally, the Maryland Legislature has enacted the "Equal Access to Public Services for Individuals with Limited English Proficiency" statutes, prompting the development of this LAP:

³ Maryland Department of Labor, Licensing and Regulation. (Draft) *LEP Plan*. 2017. [{Insert link}](#)

⁴ 29 CFR 38.25(a)(1)(A).

The General Assembly finds that the inability to speak, understand, or read the English language is a barrier that prevents access to public services provided by State departments, agencies, and programs, and that the public services available through these entities are essential to the welfare of Maryland residents. It is the policy of the State that State departments, agencies, and programs shall provide equal access to public services for individuals with limited English proficiency.⁵

PURPOSE

DLLR is working diligently to prioritize “people over performance”⁶ and recognizes room for improvement in services to the LEP population. The dual purpose of this LAP is to 1) share current DWDAL and DUI resources and practices to serve LEP individuals, and 2) identify future strategies to enhance service delivery to LEP customers pursuant to the OFP (draft) *LEP Plan*, Maryland Statute, and WIOA. This Plan aligns with Governor Larry Hogan’s strategic vision of “changing Maryland for the better” by offering strategies to improve service to adult learners, claimants, employers, and jobseekers. Implementation of this Plan will improve the quality of life for a population facing challenging barriers to employment and education.

This LAP serves as DWDAL’s and DUI’s response to OFP’s (draft) *LEP Plan* and will outline provisions for the following seven required Division-level activities related to LEP service:

- a. Perform a needs and capacity assessment;
- b. Arrange for oral language assistance, as appropriate;
- c. Translate vital documents into languages other than English;
- d. Provide notification to customers of the availability of language assistance services;
- e. Develop written guidelines and procedures for delivering LEP services;
- f. Monitor access to language assistance; and
- g. Train front-line and managerial staff.

The intention of this plan is not to create new services but rather to refine and strengthen those that already exist in order to seamlessly integrate the LEP population into Maryland’s workforce system.

This LAP will be reviewed and updated biennially by a group of relevant stakeholders and subject matter experts. It will be distributed for public comment, with review by staff from the

⁵ Md. STATE GOVERNMENT Code Ann. §10-1101.

⁶ *Maryland Workforce Innovation and Opportunity Act State Plan*.
<http://www.dllr.maryland.gov/wdplan/wdstateplan.pdf>

WIOA Alignment Group, including: the DLLR OFP, the AJCs, LWDAs, Maryland's Department of Human Services (DHS), WIOA Title II adult education providers, Local Departments of Social Services (LDSS), and the Maryland State Department of Education's Division of Rehabilitation Services (DORS). The mission of the WIOA Alignment Group is to ensure that implementation of the Maryland WIOA State Plan and to facilitate system-wide adoption and implementation of the goals and benchmarks.

DIVISION ROLES

Division of Workforce Development and Adult Learning

DWDAL coordinates job seeker, business, and adult learning services as part of the implementation of WIOA. WIOA was signed into law on July 22, 2014, and went into effect July 1, 2015. It envisions connecting businesses with job seekers through meaningful partnerships among workforce, education, human services, and economic development entities to ensure optimum results and leveraging of resources. The law addresses the needs of jobseekers through establishing a workforce system that helps them access employment, education, training, and support services to succeed in the labor market. DWDAL funds business-driven solutions for workforce and oversees the efficient operation of Maryland's American Job Center locations and administers WIOA Title I, Title II, and Title III programs. Additionally, the Division provides guidance to Maryland's LWDAs.

DWDAL routinely services Maryland's linguistically diverse population. While data is not currently available on the primary languages spoken by AJC customers, many LEP individuals do access AJC resources, especially in Montgomery and Prince George's Counties. This population is also served through English as a Second Language (ESL) programming at 25 DLLR-funded adult education sites around the State. Additionally, the Division serves the diverse incarcerated population in Maryland through the Correctional Education Program which actively provides academic, vocational, and transition instruction at 21 correctional institution sites.

DWDAL will be responsible for adhering to the provisions outlined in this LAP pursuant to WIOA Section 188, Md. Code Ann. §10-1101- §10-1103, and OFP's (draft) *LEP Plan* in services to job seekers, adult education students, and businesses. WIOA Title I, II, and III sites and staff shall be responsible for implementing the subsequent strategies to enhance services to the LEP population. DWDAL's website can be accessed here:

<http://www.dllr.state.md.us/employment/>

Division of Unemployment Insurance

DLLR's Division of Unemployment Insurance (DUI) is an employer funded insurance program which provides benefits to eligible persons who are unemployed through no fault of their own and who are ready, willing, able to work, and actively seeking work. The money for unemployment insurance benefits comes from revenue paid by employers. Claimants and customers are served through four Claim Centers, geographically positioned throughout Maryland. The Appeals Division and the Inquiry-Correspondence Unit are located in Baltimore City.

As with DWDAL, DUI regularly serves Maryland's LEP population and sees a high demand for services in Spanish. The Division has taken many steps to ensure excellent customer service delivery to this subset of customers, including offering interpreters at the College Park Claim Center. Additionally, DUI utilizes telephone interpretation services at all Claim Centers to assist claimants and customers who speak all languages. DUI will be responsible for adhering to the provisions outlined in this LAP pursuant to Md. STATE GOVERNMENT Code Ann. §10-1101- §10-1103, and OFP's (draft) *LEP Plan* in service to DUI claimants.

DUI's website can be accessed

here: <http://www.dllr.state.md.us/employment/unemployment.shtml>

STAKEHOLDER CONSULTATION

Various offices and individuals within DLLR provided input on this LAP. Meetings and interviews were conducted with relevant staff in July and August of 2017 in order to collect information on Maryland's LEP clients and the current practices to serve them. These conversations jointly informed *Maryland's Nondiscrimination Plan under the Workforce Innovation and Opportunity Act (Nondiscrimination Plan)* and the LAP. Contributing staff included:

- Program Specialists, Office of Adult Education & Literacy Services for DWDAL, including those specializing in data collection and ESL instruction;
- Chairperson, DUI Board of Appeals;
- LWDA Director, Prince George's County;
- Supervisor, DUI Inquiry-Correspondence Unit;
- Director, Office of Workforce Development;
- Labor Exchange Administrators representing Maryland's 12 LWDAs;
- Director, Office of Fair Practices;
- Director of Policy for DWDAL;
- System Administrator, Maryland Workforce Exchange (MWE);

- WIOA Title II adult education program administrator, a Baltimore City site;
- Manager, DWDAL Office of Monitoring and Compliance;
- DWDAL Communications Director (website); and
- New Americans Initiative Coordinator, DWDAL.

Additionally, the Skilled Immigrant Task Force, a group co-sponsored by DWDAL and the Maryland Office for Refugees and Asylees (MORA), contributed to this report (see more information about this group on page 15).

This LAP was shared with DWDAL and DUI staff and posted for a three-week public comment period. Suggestions were taken into consideration before a final version was published.

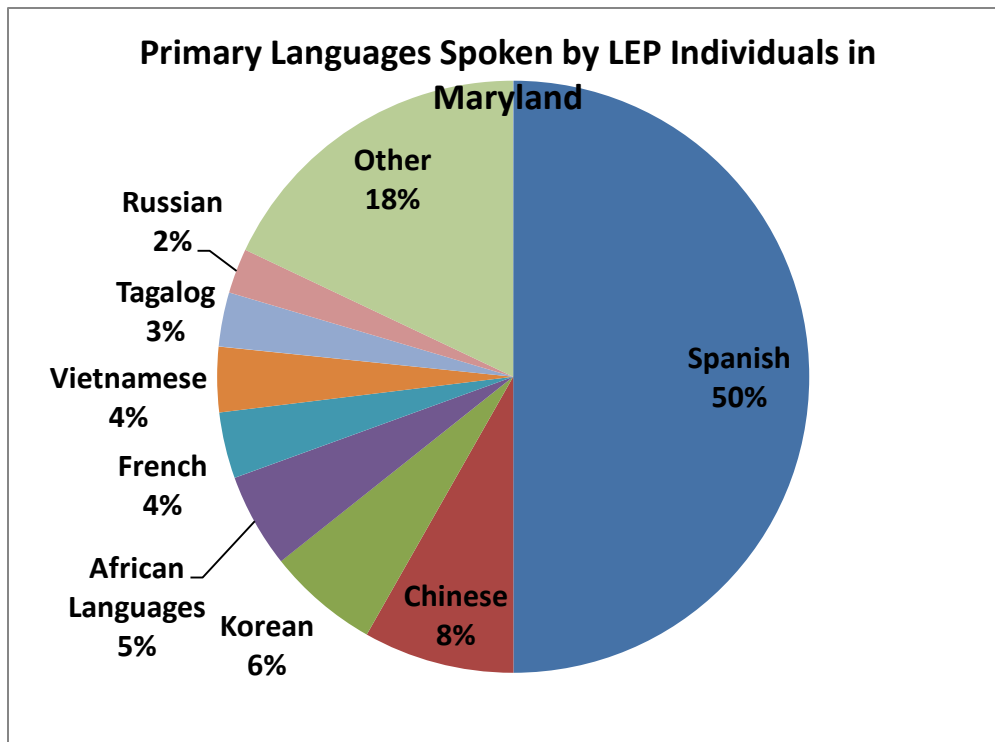
CURRENT DATA AND PROMISING PRACTICES

This section of the LAP will serve as a report on current data, resources, points of service contact, and practices utilized by DWDAL and DUI to provide equitable access to LEP customers.

Language Diversity in Maryland

According to the U.S. Census Bureau, Maryland is home to 6,016,447 residents.⁷ Of that population, 17.2% of persons age 5 or older report that they speak a language other than English at home. The Migration Policy Institute reviewed this data and quantified information regarding the broad spectrum of languages spoken by Maryland's LEP residents.

The graphic below represents the eight identified non-English languages or language clusters that are spoken by 2% or more of LEP Marylanders. The "Other" category represents languages spoken by *less than 2%* of Maryland's LEP population. This includes: Indic languages, Asian languages, Urdu, Persian, Portuguese, Gujarati, French Creole, Arabic, German, Hindi, Greek, Indo-European languages, Italian, Japanese, Thai, Slavic languages, Pacific Islander languages, Polish, Mon-Khmer, Hebrew, Serbo-Croatian, and Hungarian.⁸ These languages are a broad representation of those spoken in the State. Please see page 25 for instructions on identifying commonly spoken languages in your area.



⁷ U.S. Census Bureau, 2010 Census Population, p. 94-171.

<https://www.census.gov/quickfacts/fact/table/MD/AGE775216#viewtop>

⁸ Migration Policy Institute from the U.S. Census Bureau's pooled 2009-2013 American Community Survey, Table B16001 "Languages Spoken at Home by Ability to Speak English for Populations 5 Years and Over."

Points of Contact with Customer Population

DWDAL and DUI have contact with LEP customers, students, and jobseekers at the statewide locations detailed below.

DLLR WIOA Title II Adult Education Grantee Sites Offering ESL

Allegany College of Maryland
 Anne Arundel County Public Schools
 Anne Arundel Community College
 Baltimore City Community College
 Carroll Community College
 Cecil College
 Charles County Public Schools, Lifelong Learning Center
 Chesapeake College
 College of Southern Maryland
 Community College of Baltimore County
 Frederick Community College
 Garrett College
 Hagerstown Community College
 Harford Community College
 Howard Community College
 Howard County Library System
 Literacy Council of Montgomery County
 Montgomery College
 Prince George's Community College
 Somerset County Public Schools
 Strong City Baltimore Adult Learning Center
 Worcester County Board of Education
 Wor-Wic Community College

DUI Claim Centers and Appeals Division⁹

Appeals Division (Baltimore City)
 College Park Claim Center
 Cumberland Claim Center
 Salisbury Claim Center
 Towson Claim Center

The American Job Center Network

Maryland is divided into 12 LWDAs:

⁹ Note: Maryland UI Claim Centers are telephone operated.

1. Prince George's County
2. Anne Arundel
3. Montgomery
4. Baltimore County
5. Baltimore City
6. Lower Shore (made up of Wicomico, Somerset, and Worcester)
7. Upper Shore (made up of Kent, Queen Anne's, Talbot, Caroline, and Dorchester)
8. Susquehanna (made up of Harford and Cecil)
9. Mid-Maryland (made up of Carroll and Howard)
10. Southern Maryland (made up of Charles, Calvert, and St. Mary's)
11. Western Maryland (made up of Garrett, Allegany, and Washington)
12. Frederick County

Contact information for these sites is available at: <https://www.dllr.state.md.us/county/>

Office of Fair Practices (OFP)

DLLR's Office of Fair Practices is responsible for overall compliance in regard to equal opportunity (EO) and nondiscrimination matters. OFP provides technical assistance and professional development opportunities. Additionally, this Office oversees the receipt and resolution of employee complaints related to EO.

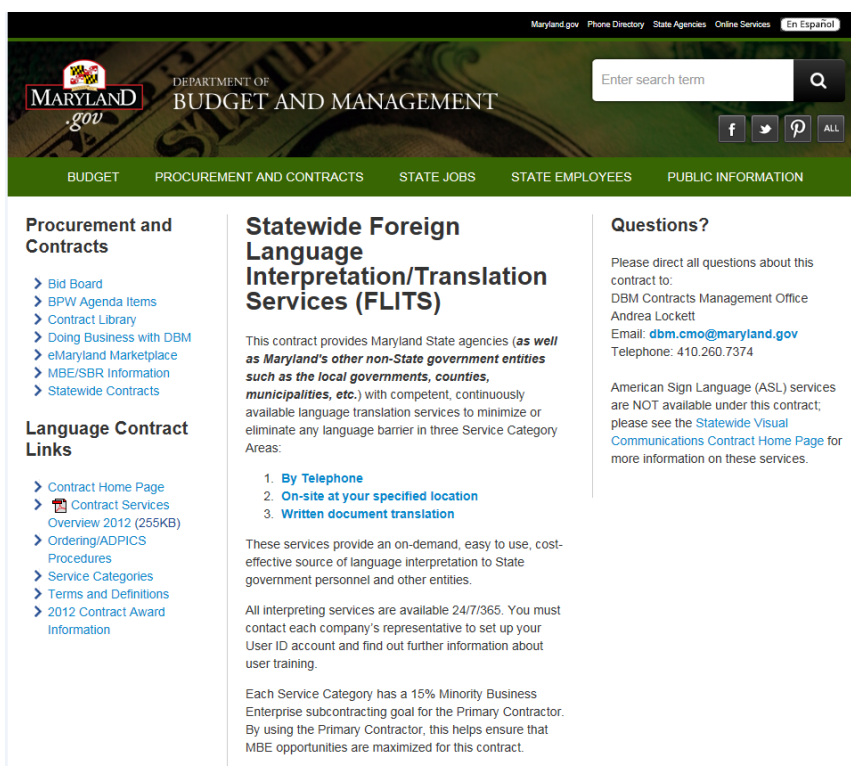
OFP's website serves as a repository of relevant information, including EO federal guidelines, state policies, and information regarding LEP. OFP's website can be found at:

<https://www.dllr.state.md.us/oeope/>

Language Resources Available at DWDAL and DUI

1. Office of Fair Practices EO Law available in Spanish:
<https://www.dllr.state.md.us/oeope/equalsp.shtml>
2. Maryland Department of Budget and Management's (DBM) Statewide Foreign Language Interpretation/Translation Services (FLITS) webpage:
<http://dbm.maryland.gov/proc-contracts/Pages/statewide-contracts/LanguageContractHome.aspx>
 - a. State of Maryland contractor for over-the-phone interpretation services (oral): <https://www.languageinc.com/state-of-maryland>
 - b. State of Maryland contractor for in-person interpretation services (oral): <http://ad-astrainc.com/welcome/>

- c. State of Maryland contractor for translations services
(written): <https://www.schreibernet.com/>



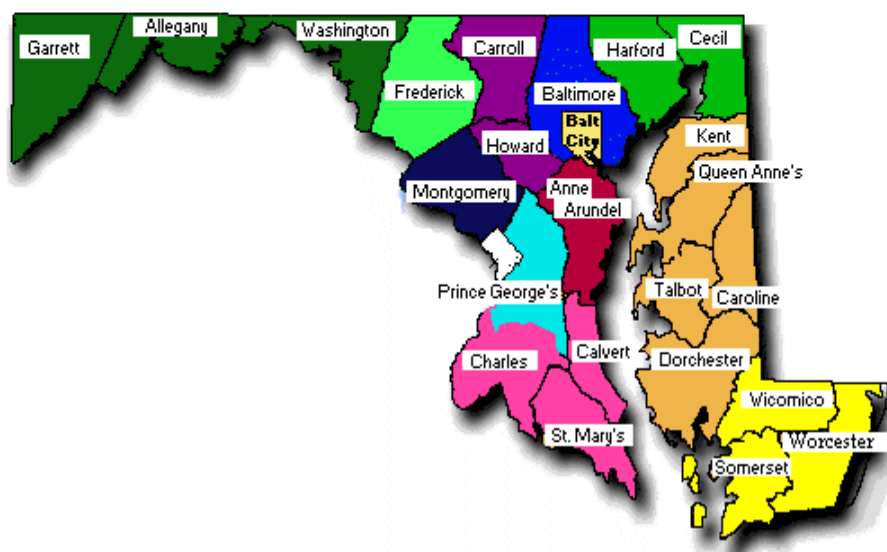
3. DWDAL multilingual staff list organized by American Job Center¹⁰
(See Appendix A)
4. DWDAL homepage with information available in English and Spanish and embedded Google Translate tool:¹¹
<https://www.dllr.state.md.us/employment/#es>
5. The Maryland Workforce Exchange website is available in Spanish. Customers can select this option when registering to customize the language of their account.
<https://mwejobs.maryland.gov/vosnet/Default.aspx>
6. DWDAL-sponsored ESL class interactive locator page, organized by county and LWDA:
<https://www.dllr.state.md.us/gedmd/programs.shtml>

¹⁰ Revised as of September 2017.

¹¹ Note: The DWDAL homepage will soon feature a Google Translate option.

Directory of Maryland Adult Education Programs/Classes - Adult Education and Literacy Services

To find an adult education program in your community, click on the area where you live.



7. DUI “Ayuda en Español” page for general information and contacts:
<https://www.dllr.state.md.us/spanish/desempleo.shtml>

8. “I Speak” cards available for display at AJCs in 38 common languages identified by the U.S. Census Bureau (a sample excerpt is represented below):

<https://www.lep.gov/ISpeakCards2004.pdf>

2004 Census Test	United States Census 2010 LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p>	1. Arabic
<input type="checkbox"/> <p>Խոսողում ես, չեմ խոսում կատարեք այս քանակություն, եթե խոսում կամ կարդում եք հայերեն:</p>	2. Armenian
<input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p>	3. Bengali
<input type="checkbox"/> <p>ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p>	4. Cambodian
<input type="checkbox"/> <p>Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p>	5. Chamorro
<input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p>	6. Simplified Chinese
<input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p>	7. Traditional Chinese
<input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p>	8. Croatian

9. DUI homepage with embedded Google Translate tool for 103 languages and link to Spanish resources:

<https://www.dllr.state.md.us/employment/unemployment.shtml>

Division of Unemployment Insurance

ALERT! Online Maryland Unemployment Insurance claims may only be filed on mdunemployment.com

BENEFITS

Applicants

- [How to Apply for Maryland Unemployment Insurance](#)
- [Apply for Unemployment Insurance Benefits](#)
- [File Your WEBCERT](#)
- [Frequently Asked Questions](#)
- [Claim Center Telephone Numbers](#)
- [Work Search Log Available for All Claimants](#)
- [Español](#)
- [Appeals](#)



 Select Language ▼



Employers

- [Important Information about Maryland's Unemployment Insurance 2017 Tax Rates](#)
- [New Employer Account Registration](#)
- [File and Pay Quarterly Contribution Report](#)
- [Submit a Request for Separation Information Online](#)
- [State Information Data Exchange System \(SIDES\)](#)
- [Owe Taxes? No Driver's License or Vehicle Registration Renewal](#)
- [Control Your Unemployment Insurance Costs](#)
- [Forms and Publications](#)
- [Online Applications](#)
- [Contact Information](#)

Maryland's Skilled Immigrant Task Force

The Skilled Immigrant Task Force (Task Force) was created in June 2016 to address workforce-related issues preventing foreign-trained immigrants from securing jobs in their professional fields. As part of its mission and goals, the Task Force explores the challenges associated with LEP and works to develop strategies to reduce barriers to employment. This robust network of multi-sector stakeholders is co-sponsored by two State agencies: DHS and DLLR. Other groups represented include the AJCs, community colleges, LDSS, and immigrant-serving organizations.

The Task Force has contributed to the preparation and review of this LAP. Additionally, the group is responsible for the creation of a WIOA system assessment tool that will be mentioned in the *Language Access Plan: Updated Practices* section of this document.



LANGUAGE ACCESS PLAN: UPDATED PRACTICES

Maryland and DLLR are committed to providing excellent customer service to all who live and work in the State. Additionally, DWDAL and DUI are working to prioritize “people over performance.”¹² The target populations to be impacted by this LAP are the LEP individuals served by DWDAL and UI (WIOA Title I, II, and III sites, all DUI Claim Centers, the Board of Appeals, and the Inquiry-Correspondence Unit). In order to deliver quality and equitable service to LEP Marylanders and to comply with the guidance provided by DLLR OFP, Maryland Statute, and WIOA, DWDAL, DUI, and grantees will address the following:

- a. Perform a needs and capacity assessment regarding service to LEP customers/students;
- b. Provide strategies for oral interpretation;
- c. Identify and translate vital documents into languages other than English;
- d. Identify LEP Status and provide notification to customers/students of the availability of language assistance services, including through the use of Babel Notices;
- e. Develop written guidelines and procedures for delivering LEP services;
- f. Monitor access to language assistance;
- g. Train staff regarding assistive technologies and employable techniques to enhance customer service;
- h. Collect and code participant data pertaining to LEP status;
- i. Identify a Language Access Coordinator; and
- j. Allocate resources to implement this LAP.

This section of the LAP will serve to demonstrate how DWDAL and DUI intend to develop, implement, and monitor the provisions listed above. The Divisions will review and update the Plan biennially and it will be subject to continual assessment and revision.

Needs and Capacity Assessment

The Skilled Immigrant Task Force’s *Capacity Building and Best Practices* subcommittee conducted a SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis of language access and services among WIOA network partners in 2016. This analysis led to the creation and distribution of a workforce system survey that assessed the capacity of DWDAL offices and staff to serve those with limited English. With guidance from the “Language Access Assessment” created by the U.S. Department of Justice’s Civil Rights Division, the *Workforce System Survey: Serving Limited English Proficiency (LEP) Individuals and Skilled Immigrants* was drafted and then disseminated in August of 2017.

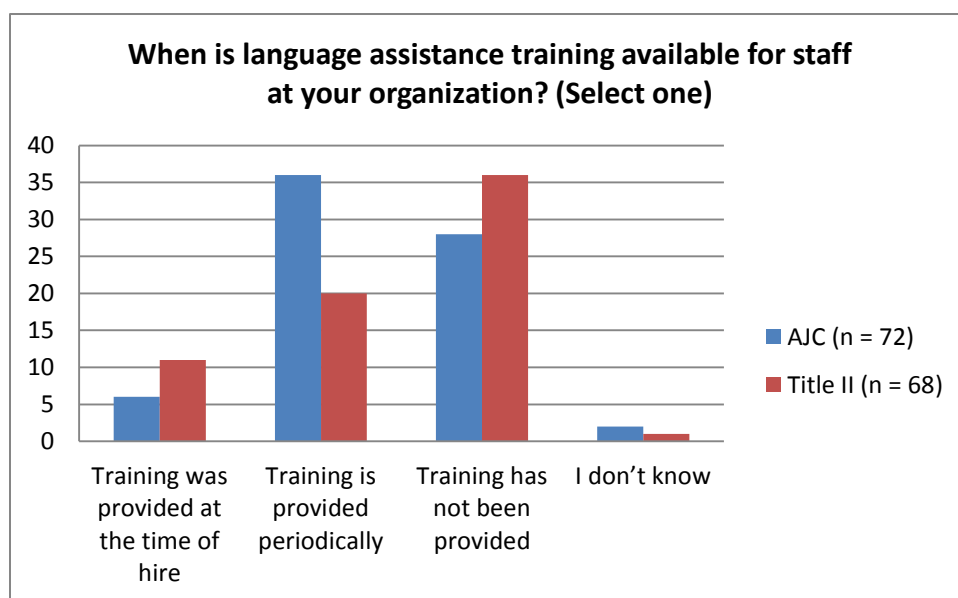
¹² *Maryland Workforce Innovation and Opportunity Act State Plan*.
<http://www.dllr.maryland.gov/wdplan/wdstateplan.pdf>

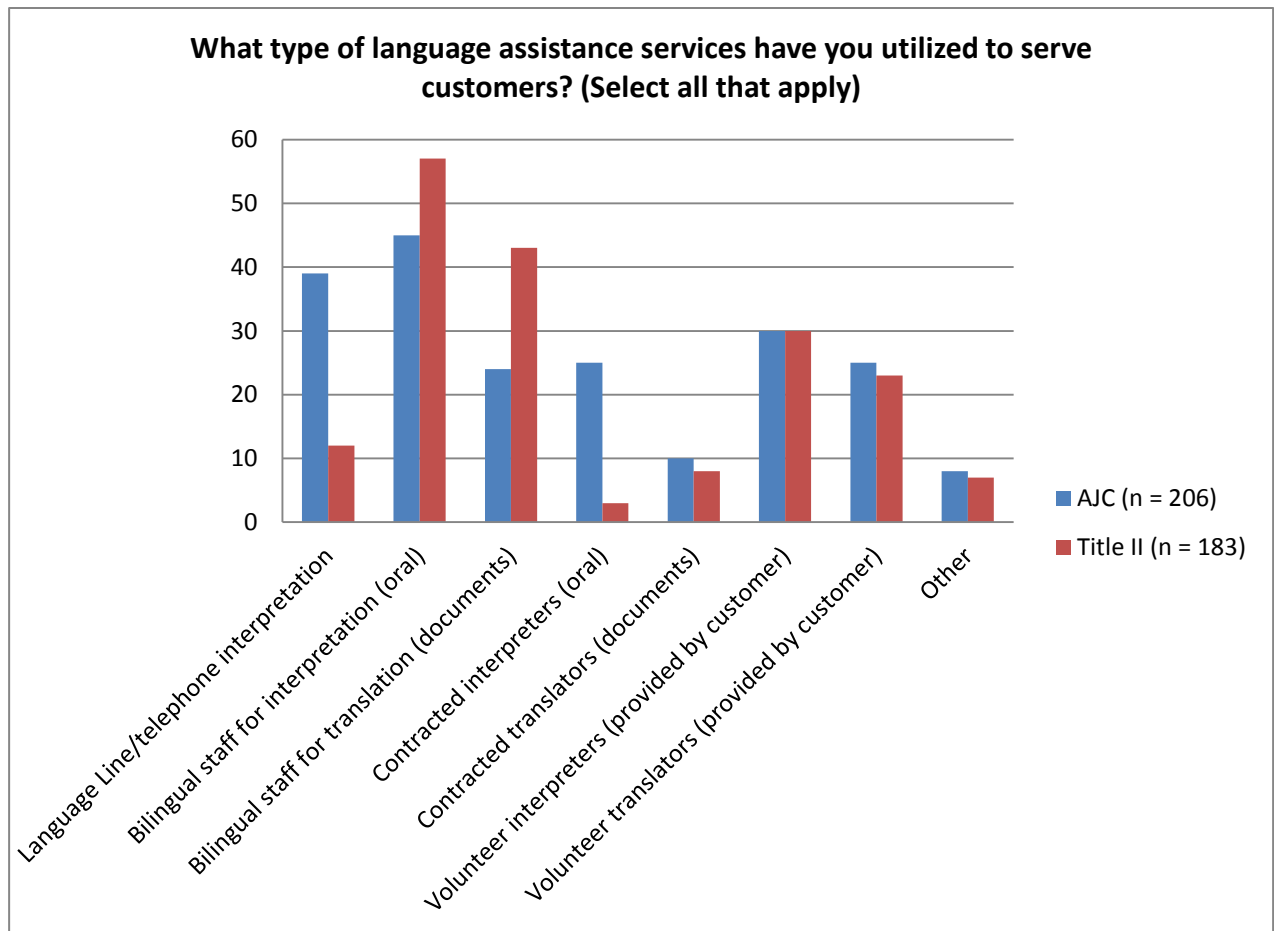
This assessment tool was distributed to leadership and frontline staff at the AJCs, LDSS, Title II adult education sites, and DORS. There were 427 responses statewide.

Survey items related to language access and service to LEP customers included:

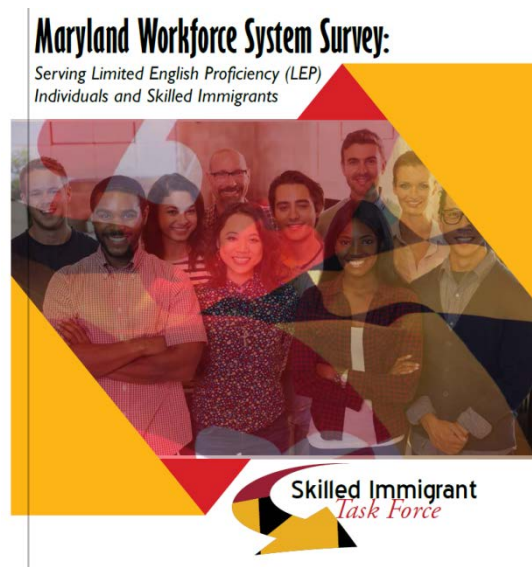
- How does your agency identify LEP individuals?
- How do LEP individuals report hearing about your organization and services?
- If you collect and record primary language data from individuals, where is the information stored?
- Identify non-English languages encountered at your organization or site.
- What type of language assistance services have you utilized to serve customers?
- When is language assistance training available for staff at your organization?
- What outreach does your organization currently conduct to engage LEP individuals and immigrant communities in services?
- What resources have you used to serve LEP individuals?
- Do you feel equipped with the skills and tools necessary to guide an LEP individual through the process of finding a job?
- In what ways do you think your organization could enhance service for LEP individuals?
- What training or technical assistance do you require in order to improve service to LEP individuals in Maryland's workforce system?

Information from the Survey informed this LAP and revealed a great deal about the capacity of the current network to serve the LEP population. The items below serve as an example of figures obtained regarding staff capacity at AJCs and WIOA Title II sites only:





Results of this capacity assessment will drive future staff training (detailed beginning on page 29) and the creation of technical assistance opportunities. The survey is available online here: <http://www.dlir.state.md.us/employment/wdskilledimmigrantsurvey.pdf>.



Oral Interpretation Services

LEP.gov uses language from a Supreme Court decision to define and distinguish “interpretation” as follows: “The ordinary or common meaning of ‘interpreter’ does not include those who translate writings. Instead, we find that an interpreter is normally understood as one who translates orally from one language to another.”¹³ It is strictly a communication strategy and does not extend to consultation or legal advice.

Oral interpretation services **must** be available to LEP customers in a reasonable amount of time and may be provided over the telephone or in-person. “Reasonableness” shall be determined based on the urgency of a service inquiry. Providers should consider the nature of access, customer request, geographic constraints, and the terms of vendor contracts¹⁴ when determining how and when services are delivered.

In accordance with 29 CFR § 38.9 (f):

- (1) A recipient shall not require an LEP individual to provide their own interpreter;*
- (2) A recipient also shall not rely on an LEP individual's minor child or adult family or friend(s) to interpret or facilitate communication, except:*
 - (i) An LEP individual's minor child or adult family or friend(s) may interpret or facilitate communication in emergency situations while awaiting a qualified interpreter; or*
 - (ii) The accompanying adult (but not minor child) may interpret or facilitate communication when the information conveyed is of minimal importance to the services to be provided or when the LEP individual specifically requests that the accompanying adult provide language assistance, the accompanying adult agrees to provide assistance, and reliance on that adult for such assistance is appropriate under the circumstances. When the recipient permits the accompanying adult to provide such assistance, it must make and retain a record of the LEP individual's decision to use their own interpreter.*
- (3) Where precise, complete, and accurate interpretations or translation of information and/or testimony are critical for adjudicatory or legal reasons, or where the competency of the interpreter requested by the LEP individual is not established, a recipient may decide to provide its own, independent interpreter, even if an LEP individual wants to use their own interpreter as well.¹⁵*

¹³ *Taniguchi v. Kan Pac. Saipan, Ltd.*, 132 S Ct 1997, 2003-04 (May 21, 2012). LEP.gov

¹⁴ DBM's Foreign Language Interpretation/Translation Services vendor contract defines covered core languages, telephone interpretation availability, critical services, and required contractor notice timelines. The contract is available here: <http://www.dbm.maryland.gov/proc-contracts/Documents/StatewideContracts/ForeignLanguageServices/overviewcontractservices2012.pdf>

¹⁵ 29 CFR § 38.9 (f)

Maryland Statute defines this type of service as the following: “‘Oral language services’ includes various methods to provide verbal information and interpretation such as staff interpreters, bilingual staff, telephone interpreter programs, and private interpreter programs.”¹⁶ Statute also stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider:

*Reasonable steps to provide equal access to public services include: 1) the provision of oral language services for individuals with limited English proficiency, which must be through face-to-face, in-house oral language services if contact between the agency and individuals with limited English proficiency is on a weekly or more frequent basis.*¹⁷

29 CFR § 38.9 provides that reasonable steps must be taken to ensure meaningful access for LEP individuals under WIOA Title I training programs. This can include in-person or telephone interpretation for non-English languages.¹⁸

Pursuant to the law and guidance detailed above, DWDAL, DUI, and grantees will arrange for oral language assistance by utilizing the following three strategies:

- Multilingual staff or volunteers,
- Telephone interpretation services, and
- Certified in-person interpreters.

Financial provisions to cover these services will be reflected in applicable DWDAL and DUI budgets, Memoranda of Understanding, and Resource Sharing Agreements (RSAs). Assessing the competency of State of Maryland interpretation and translation contractors will be the responsibility of DBM. DWDAL and DUI will rely on that Agency’s assurance of qualifications.

Multilingual Staff or Volunteers

With consideration of budget, areas of the State with particularly dense populations of LEP individuals shall employ staff fluent in the native languages of nearby residents.

To accurately determine languages spoken in a particular LWDA, AJC and WIOA Title II staff will utilize U.S. Census data or information from the American Community Survey. See Appendix A for a list of multilingual staff by AJC site in Maryland.

Since DUI claimant services are primarily delivered over the telephone, this Division has opted to strategically position multilingual staff in the College Park Claim Center and route all calls requiring interpretation to that site. The predominant language is Spanish.

¹⁶ Md. STATE GOVERNMENT Code Ann. §10-1102 (d).

¹⁷ Md. STATE GOVERNMENT Code Ann. §10-1103(b)(1).

¹⁸ 29 CFR § 38.9 (b)(2)(ii)

DWDAL, DUI, and grantee staff may also opt to utilize volunteer interpreters for large gatherings such as job fairs or mass registration events. Volunteers should have a strong command of oral language but do not need to be certified interpreters. These individuals may not assist with completing formal paperwork or registrations that require a signature, but can support the flow of services. A certified interpreter is required when a customer or student is receiving and signing vital information and/or documents.

Pursuant to 29 CFR § 38.9 (f)(2)(ii), volunteers provided by an LEP individual, such as an accompanying adult (but not a minor child), may only assist with the completion of formal documents after the customer has been offered and declined alternative assistance and such a decision must be recorded and retained by staff¹⁹.

Telephone Interpretation Services



Telephone interpretation services allow staff to serve a customer through the assistance of an external, third party interpreter. Staff can relay their conversations and questions in English over the telephone and their speech is interpreted and spoken back to a client in their preferred language.

The State of Maryland is contracted with Language Line Solutions (Language Line) to provide this service. LWDAs and DUI may access this provider under the State's vendor agreement.²⁰ Title I sites are permitted to utilize the State's Language Line contract, should they choose, but must obtain their own billing codes and explicitly mention usage in their WIOA RSA.²¹ Adult education providers under Title II and Wagner-Peyser staff are also able to access this resource under DBM's existing vendor agreement.

Language Line is available 24 hours a day, 365 days a year, and has a repertoire of 240 languages. The number to call for interpretation services is 1-800-752-6096. Staff utilizing Language Line should contact the appropriate Language Access Coordinator (identified on pages 30-31) for the proper client ID# and access code to ensure accurate billing. Sites wishing to initiate services under this DBM contract should contact their DWDAL or DUI Language Access Coordinator for details.

¹⁹ 29 CFR § 38.9 (f)(2)(ii)

²⁰ Note: The State of Maryland Department of Budget and Management is currently procuring new Statewide Foreign Language Interpretation/Translation Services. This vendor may change in early 2018.

²¹ WIOA Memoranda of Understanding & Resource Sharing Agreements
<http://www.dllr.state.md.us/employment/mpi/mpi9-16.pdf>

More information about this provider is available at the link below and on DBM's Statewide Foreign Language Interpretation/Translation Services webpage listed on page 11 of this Plan²². Additionally, a Quick Reference Guide provided by Language Line is attached as Appendix C.

<https://www.language.com/>

Certified In-Person Interpreters



In-person interpretation is a real-time, face-to-face oral interpretation service option that allows customers to receive information in their preferred language with incorporation of “cultural and syntactical context.”²³ Service is delivered on site by a certified interpreter.

The State of Maryland is contracted with Ad Astra, Inc. (Ad Astra) to provide this service. LWDA's and DUI may access this provider under the State's vendor agreement.²⁴ As with telephone interpretation services, Title I sites are permitted to utilize the State's Ad Astra contract, should they choose, but must obtain their own billing codes and explicitly mention usage in their WIOA RSA. Title II adult education providers and Wagner-Peyser staffs are also able to access this resource under DBM's existing vendor agreement.

Ad Astra is located in Silver Spring, Maryland and offers on-site interpretation services in over 250 languages. To schedule an in-person interpreter, staff should verify their ID code with the Language Access Coordinator and call 301-408-4242. Sites wishing to initiate services under this DBM contract should contact their DWDAL or DUI Language Access Coordinator for details.

More information about this provider is available at the link below and on DBM's Statewide Foreign Language Interpretation/Translation Services webpage listed on page 11 of this Plan.²⁵

<http://ad-astrainc.com/welcome/>

²² Section 1.28 of the Statewide Contracts for Foreign Language Services permits Maryland county, municipal and other non-state governments, government and not for profit organizations to purchase services at the same prices, terms and conditions agreed to by the contractors under the Statewide contract. See the contract for additional details. [StatewideContracts/ForeignLanguageServices/](#)

²³ <http://ad-astrainc.com/services/interpretation/>. October 2017.

²⁴ Note: The State of Maryland Department of Budget and Management is currently procuring new Statewide Foreign Language Interpretation/Translation Services. This vendor may change in early 2018.

²⁵ See footnote 22.

Vital Documents Translation

Definitions and Explanations

To ensure equal access to services and information, vital documents should be translated and made available to LEP customers (to differentiate from “interpretation,” note that “translation” refers to written and print items, inclusive of online content). DLLR OFP, Maryland Statute, and WIOA all offer similar definitions and provisions related to vital documents, with some slight variations. Those provisions are detailed below.

DLLR OFP describes “vital documents” in the Agency’s (draft) *LEP Plan* as the following:

“Vital documents” are documents that convey information that critically affects the ability of the program recipient to make decisions about his or her participation in the program. Vital documents include applications, public notices, consent forms, letters containing important information regarding participation in a program, eligibility rules, notices pertaining to the reduction, denial, or termination of benefits, right to appeal, notices advising of the availability of language assistance, and outreach and community education materials.

While this list of documents is extensive, it should be noted that it is *not* comprehensive and may not align with items independently developed and utilized by various LWDAs, adult education Title II sites, or DUI Claim Centers. Staff should exercise professional and critical judgement when determining if something is a “vital document” and consult the Language Access Coordinator for clarification, if necessary. Additionally, LWDA staff should consider if any of their correspondence with LEP business owners requires translation.

Maryland Statute defines “Vital documents” as all applications or informational materials, notices, and complaint forms offered by State departments, agencies, and programs.”²⁶ The law further explains the standard for required written translation as:

*Reasonable steps to provide equal access to public services include...the translation of vital documents ordinarily provided to the public into any language spoken by any limited English proficient population that constitutes 3% of the overall population within the geographic area served by a local office of a State program as measured by the United States Census;*²⁷

²⁶ Md. STATE GOVERNMENT Code Ann §10-1102 (f)(1).

²⁷ Md. STATE GOVERNMENT Code Ann. §10-1103 (b)(2i).

Effective October 1, 2016, this section of the Code was updated to add new provisions for equal access to website content. According to section §10-1103 (c)(1)(i), web content should be available in non-English languages that constitute 0.5% of the *overall* state population, according to the most recent U.S. Census. According to figures provided by the Migration Policy Institute’s analysis of the U.S. Census Bureau’s American Community Survey (2009-2013), Spanish is the only language that currently meets this requirement in Maryland.²⁸ However, some State agencies have opted to translate web content or embed tools, such as Google Translate, on their sites to increase accessibility (see DUI homepage example on page 14). As evident on the graphic on page 8, Chinese and Korean are the next two most commonly spoken languages by LEP individuals in Maryland.

WIOA regulations also provide the following:

(g) With regard to vital information:

(1) For languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, a recipient must translate vital information in written materials into these languages and make the translations readily available in hard copy, upon request, or electronically such as on a Web site. Written training materials offered or used within employment-related training programs as defined under § 38.4(t) are excluded from these translation requirements. However, recipients must take reasonable steps to ensure meaningful access as stated in § 38.9(b).

(2) For languages not spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, a recipient must take reasonable steps to meet the particularized language needs of LEP individuals who seek to learn about, participate in, and/or access the aid, benefit, service, or training that the recipient provides. Vital information may be conveyed orally if not translated.²⁹

LWDAs and DUI Claim Centers shall adhere to figures presented in the State law regarding LEP populations for which vital document translation is necessary (languages of 3% or more of the local population area) and OFP’s (draft) LEP Plan for suggestions as to what constitutes a “vital document.”

²⁸ Migration Policy Institute from the U.S. Census Bureau’s pooled 2009-2013 American Community Survey, Table B16001 “Languages Spoken at Home by Ability to Speak English for Populations 5 Years and Over.”

²⁹ 29 CFR § 38.9 (g)(1-2)

Identification and Determination Procedures

In order to assess, determine, and serve LEP customers through equitable access to written documents, DWDAL and DUI staff shall adhere to the following five-step process:

1. Identify vital documents for an office giving consideration to anything that is signed, collected/retained, or shared publicly;
2. Identify the languages spoken by the LEP population of an area (LWDAs should use their county or counties; Title II adult education sites are encouraged to consider the student population served in ESL courses; DUI should follow the regions that align with their Claim Centers) using U.S. Census data and compare to the overall population of that region;
3. From the data collected in step 2, determine an area's "statutory languages" and target them for vital document translation ("statutory languages" are those identified in a particular area that constitute languages spoken by 3% or more of the local population);
4. Order translation of vital document material into the statutory languages (multilingual staff cannot be used to translate vital documents but may review them for accuracy); and
5. Disseminate and post material according to notification of language service provisions (see *Identifying LEP Status and Notification of Language Assistance Services* section on page 26).

It is important to note that Maryland is a linguistically diverse state, with a varied LEP population. Some regions may follow the above outlined procedure and determine that there are no statutory languages in an area. Regardless of the variety or volume of languages present in a given region, all written material should be initially drafted in language that is clear and easy for a broad audience to read and understand. (LWDA and DUI Claim Center staff are encouraged to collaborate with WIOA Title II providers should they need assistance drafting documents that are accessible to those with low levels of English literacy).

Translation Services



The State of Maryland is contracted with Schreiber Translations, Inc. (Schreiber) to provide written translation services. LWDAs and DUI may access this provider under the State's vendor

agreement.³⁰ (Should sites opt to procure their own translation technologies, they will be responsible for verifying that these services are compliant). As with telephone and in-person interpretation services, Title I sites are permitted to utilize the State's Schreiber contract, should they choose, but must obtain their own billing codes and explicitly mention usage in their WIOA RSA. Adult education providers under WIOA Title II and Wagner-Peyser staff are also able to access this resource under DBM's existing vendor agreement.

Schreiber is located in Rockville, Maryland and offers prompt translation services in over 120 languages. To request document translation, staff should verify their ID code with the Language Access Coordinator and call 301-424-7737. Completion of translation services is dependent on language and content length. Sites wishing to initiate services under this DBM contract should contact their DWDAL or DUI Language Access Coordinator for details.

More information about this provider is available at the link below and on DBM's Statewide Foreign Language Interpretation/Translation Services webpage listed on page 11 of this Plan.³¹
<https://www.schreibernet.com/>

Identifying LEP Status and Notification of Language Assistance Services

DWDAL, DUI, AJC, and grantee staff will identify LEP individuals through the following measures/protocols:

- Formal assessment (TABE CLAS-E, TABE, CASAS, BEST Plus 2.0, BEST Literacy, etc.),
- Self-identification or assistance request by the non-English speaker or LEP individual during intake, and
- Use of "I Speak" cards/posters to self-select preferred language (see page 13 of this LAP for an example).

Published information will be accessible to customers, students, and claimants at all times. Once LEP status has been identified, an individual should receive vital documents and interpretation in their preferred language. LWDAs, Title II sites, and DUI shall prepare all publicly shared materials in any statutorily prescribed languages identified in their area (see "Identification and Determination Procedures" on page 25).

In cases where vital information is being shared, LWDAs, Title II sites, and DUI Claim Centers will add Babel Notices to their materials in order to ensure equitable access.³² A Babel Notice is a

³⁰ Note: The State of Maryland Department of Budget and Management is currently procuring new Statewide Foreign Language Interpretation/Translation Services. This vendor may change in early 2018.

³¹ See footnote 22.

³² Note: DUI is already utilizing Babel Notices in Spanish on many of their publicly shared documents.

short tag line added to a document that advises non-English speakers who they may contact to receive the information in their preferred language. These excerpts should briefly explain that the information is important and should include a telephone number or website. Sites should strategically select the telephone number they include in these messages and position a staff member to utilize a telephone interpretation service when individuals call for assistance.

Below is an example of Babel Notice language from a United States Department of Labor Training and Employment Guidance Letter for Unemployment Insurance sites:

IMPORTANT! This document(s) contains important information about your unemployment compensation rights, responsibilities and/or benefits. It is critical that you understand the information in this document.

DEADLINE FOR APPEAL: If you disagree with this determination or decision, you must file an appeal before the deadline noted in this document.

*IMMEDIATELY: If needed, call xxx-xxx-xxx for assistance in the translation and understanding of the information in the document(s) you have received.*³³

Babel Notices are a best practice to ensure equal access to information for the LEP population, but there is no standard to determine which or how many languages should be included on public materials. For the purpose of this LAP, LWDAs, Title II adult education sites, and DUI Claim Centers should include, at a minimum, Babel Notices pursuant to Md. STATE GOVERNMENT Code Ann. §10-1103 (b)(2i) and the 3% local population area stipulation.

Guidelines and Procedures for Serving LEP Individuals

DWDAL and DUI will develop written guidelines and Standard Operating Procedures (SOPs) that detail the manner in which language assistance services should be provided and recorded by staff. While an informal framework currently exists, procedures will be streamlined and formalized in 2018. Any relevant policies will also be drafted, reviewed, and issued at that time. As noted in earlier sections of this LAP, DBM is currently procuring new foreign language interpretation and translation contracts for the State of Maryland. This procurement was expected to be posted on July 1, 2017, but was delayed to FY18. The anticipated execution of new contracts following procurement, proposal review, and vendor selection is March 1, 2018, although this may be adjusted. In the future, reviews and edits to this LAP will be aligned with DBM's vendor procurement schedule in a manner that ensures seamless customer services.

³³ Unemployment Insurance Guidance Letter No. 30-11;
https://workforcesecurity.doleta.gov/dmstree/uipl/uipl2k11/uipl_3011.pdf

Many of the necessary procedures for service to LEP individuals reference unique aspects of the abovementioned vendor contracts. This includes available languages, appropriate request turnaround rates, client ID numbers, access codes, staff or representative contacts, and billing procedures. As a result, DWDAL and DUI will develop comprehensive staff SOPs for LEP language assistance services and compile them into an *LEP Service Resource Guide*. This will be a reproducible tool intended for staff use and will list additional, specific details not captured in this LAP. Future versions of this LAP will include the most current *LEP Service Resource Guide* in the Appendices. This tool will contain:

- Copies of applicable laws and regulations pursuant to LEP service (abbreviated where necessary);
- A comprehensive strategy checklist for how to assess language needs;
- Detailed instructions for how to contact the State’s interpretation vendor, including dial-in instructions, relevant access codes by LWDA and Claim Center, and web links to demonstration resources;
- Detailed procedures for how to identify and translate vital documents (including proper chain of command notification) and how to contact the State’s translation vendor;
- Detailed procedures for how to schedule an in-person interpreter (including proper chain of command notification) and how to contact the State’s in-person interpretation vendor;
- Proper coding and documentation procedures, including MWE screenshots reflecting how and where to record LEP status, preferred language, and language services;
- Process to request language assistance service training for those who are unfamiliar with or unsure how to use or document assistive technology services;
- Links to any policy issuances relevant to this LAP; and
- Contact information for the applicable Division’s Language Access Coordinator.

Monitoring Language Access

DWDAL’s Office of Monitoring and Compliance staff will ensure the accessibility and quality of language assistance activities under WIOA Title I and Title II through periodic monitoring of the implementation of this LAP. Review will occur pursuant to 29 CFR § 38.51 (Governor’s oversight and monitoring responsibilities for State Programs) and 29 CFR § 38.53 (Governor’s oversight responsibilities regarding recipients’ recordkeeping). A complete account of monitoring procedures is available in the *Nondiscrimination Plan*. The *Nondiscrimination Plan* establishes a complaint process for Title I and how to address those issues in a timely manner, as well as how stakeholders and employees may provide feedback to DWDAL. The full Plan is available here: [{Insert link}](#).

The Inquiry-Correspondence Unit in DUI tracks calls received from LEP individuals and provides a weekly report of services rendered and the claimant's preferred language.

Monitoring procedures will be reevaluated biennially as part of updating this LAP. Beginning in FY19, DWDAL's Office of Monitoring and Compliance will begin reviewing the collection of relevant data detailed in the *Language and LEP Data Collection* section of this Plan (see page 30).

Staff Training

In order to prepare staff to deliver excellent and equitable service to the LEP population, DWDAL and DUI are committed to improved staff training for both frontline and managerial positions. According to the results of the *Workforce System Survey*, 40% of responding AJC staff reported that language assistance training had not been made available to them. This percentage includes managerial, administrative, and frontline respondents.

DWDAL and DUI staff training will occur at both the time of hire and annually. The two Divisions will work collaboratively to create an *LEP Service Resource Guide*, as mentioned in a previous section, and a *Language Assistance Services* professional development opportunity. These tools will be developed and implemented by the end of 2018.

The *LEP Service Resource Guide* will be a brief, reproducible tool that will be shared with *all* staff upon time of hire. It will be available on DWDAL's and DUI's webpages. Hiring staff will review the *LEP Service Resource Guide* with new employees and discuss any questions or concerns prior to the delivery of services. See page 28 for a list of details to be included in this tool.

Additionally, a staff training titled *Language Assistance Services* will be developed by DWDAL and DUI. It will be updated and delivered annually to both managerial and frontline staff. The mode and location of delivery will vary, but may include in-person or virtual instruction. LWDAs and DUI Claim Centers may elect to require all staff to participate or adopt a "train the trainer" model. This professional development opportunity will include:

- Demonstrations of language services, including examples of using telephone interpretation;
- Updated strategies/protocols for LEP status assessment;
- Procedures for updated/enhanced MWE coding or relevant documentation requirements; and
- LAP revisions.

DWDAL and DUI will also utilize WIOA network gatherings to deliver staff training. Maryland is hosting its third WIOA Convening in January of 2018 to unpack Section 188 and share the *Nondiscrimination Plan* and this LAP with WIOA partners. Both the General Session and breakout sessions will be utilized to deliver instruction related to LEP service strategies and best practices.

Language and LEP Data Collection

In order to comply with data collection provisions under WIOA, the Office of Workforce Information and Performance within DWDAL will update the Maryland Workforce Exchange (MWE) to ensure all pertinent Title I information is captured. DUI will update their mainframe to collect the same data for claimants. This will include LEP status and preferred language as detailed in 29 § CFR 38.41(b)(2) below:

*Such records must include, but are not limited to, records on applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment. Each recipient must record the race/ethnicity, sex, age, and where known, disability status, of every applicant, registrant, participant, terminee, applicant for employment, and employee. Beginning on January 3, 2019, each recipient must also record the limited English proficiency and preferred language of each applicant, registrant, participant, and terminee. Such information must be stored in a manner that ensures confidentiality, and must be used only for the purposes of recordkeeping and reporting; determining eligibility, where appropriate, for WIOA Title I-financially assisted programs or activities; determining the extent to which the recipient is operating its WIOA Title I-financially assisted program or activity in a nondiscriminatory manner; or other use authorized by law.*³⁴

Language Access Coordinators

The Language Access Coordinators will be responsible for arranging requested annual trainings, maintaining and posting a log of multilingual staff, and providing guidance on the use of assistive technologies per DBM's vendor agreements.

DWDAL has identified the following staff member as their Language Access Coordinator:

Lauren Gilwee
New Americans Initiative Coordinator
Division of Workforce Development and Adult Learning
Maryland Department of Labor, Licensing and Regulation

³⁴ 29 § CFR 38.41(b)(2)

1100 N. Eutaw Street, Room 108
Baltimore, Maryland 21201
410-767-2268
Lauren.Gilwee@maryland.gov

DUI has identified the following staff members as their Language Access Coordinators. Please reach out to both regarding any issues:

Leroy Cox
Benefits Director
Division of Unemployment Insurance
Maryland Department of Labor, Licensing and Regulation
1100 N. Eutaw Street, Room 508
Baltimore, Maryland 21201
410-767-3252
Leroy.Cox@maryland.gov

Wayne Cooper
Supervisor, Inquiry-Correspondence Unit
Division of Unemployment Insurance
Maryland Department of Labor, Licensing and Regulation
1100 N. Eutaw Street, Room 208
Baltimore, Maryland 21201
410-767-3246
Wayne.Cooper@maryland.gov

Allocation of Resources to Implement this LAP

DWDAL will ensure that LWDAs and adult education sites are supported in their implementation of this Plan through professional development/training opportunities and financial investments. As mentioned earlier, DLLR will provide training to staff regarding specific service strategies and best practices in the coming year(s).

Additionally, DWDAL will work to centralize the translation of vital documents and will offer initial assistance to offset the cost of this process and the creation and insertion of Babel Notices. Any funding provided to LWDAs will subsequently be memorialized in the State's resource sharing contribution to the WIOA agreement. While support may vary based on proportionate demand, all sites are expected to comply with all components of this LAP.

APPENDICES

Appendix A: American Job Center Multilingual Staff List

Local Workforce Area	American Job Center	Languages Spoken (Non-English) by Title I and State Staff
Anne Arundel County	Glen Burnie American Job Center	Polish, Russian, Spanish, and Ukrainian
	Fort Meade Outreach Center	
	Arundel Mills Sales and Service Training Center	
	BWI Thurgood Marshall Airport	
Baltimore City	Eastside American Job Center	Spanish
	Northwest American Job Center	Spanish
Baltimore County	Baltimore County Workforce Development Center at Eastpoint	Spanish
	Baltimore County Workforce Development Center at Liberty Center	French, Italian, Japanese
	Baltimore County Workforce Development Center at Hunt Valley	French, Spanish
Frederick County	Frederick County Workforce Services- Frederick County Business and Employment Center	American Sign Language, Spanish
Lower Shore	One Stop Job Market (Somerset, Wicomico, and Worcester Counties)	Haitian Creole, Spanish
Mid-Maryland	Business and Employment Resource Center (Carroll County)	Spanish (p/t)
	Columbia Workforce Center (Howard County)	Bengali, French, Hindi, Korean
Montgomery County	WorkSource Montgomery American Job Center	Amharic, Bengali, Bulgarian, French, Hindi, Russian, Spanish, Vietnamese, Urdu
	WorkSource Germantown American Job Center	Hindi, Nepali, Spanish, Kiswahili
Prince George's County	Prince George's American Job Center	Amharic, Afaan Oromo, Spanish
	Laurel Regional Workforce Center Professional Outplacement Assistance Center (POAC)	French, Vietnamese
Southern Maryland	Charles County Southern Maryland JobSource	Tagalog
	Saint Mary's County Southern Maryland JobSource	
Susquehanna Region	Susquehanna Workforce Center- Elkton	
	Susquehanna Workforce Center- Bel Air	Spanish
	Susquehanna Workforce Center- University Center	
Upper Shore	Caroline County American Job Center	
	Dorchester County American Job Center	
	Kent County American Job Center	
	Queen Anne's County American Job Center	

Local Workforce Area	American Job Center	Languages Spoken (Non-English) by Title I and State Staff
	Talbot County American Job Center	
Western Maryland	Allegany County American Job Center	
	Western Maryland Consortium Garrett County Office	
	Washington County American Job Center	Spanish



WHEN RECEIVING A CALL:

1. Use Conference Hold to place the limited English speaker on hold.
2. Dial 1-866-874-3972 and enter on your telephone keypad or provide the representative your 6-digit client ID number.
3. Press 1 for Spanish or Press 2 for all other languages, at the prompt speak the name of the language you need. If you need help identifying a language Press 0 or stay on the line for assistance.
4. When the interpreter is connected, tell the interpreter what you wish to accomplish on the call and provide any special instructions. Then add the limited English speaker to the call.

Speaker, begin at step 2 and if speaker, Press 0 to transfer.