

# STATE OF VERMONT WIOA LANGUAGE ACCESS PLAN

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v1.0



The Vermont Department of Labor is an equal opportunity employer that administers equal opportunity programs. Auxiliary aids and services are available upon request to individuals with disabilities. Free language access assistance is also available. Send an email to [labor.eoofficer@vermont.gov](mailto:labor.eoofficer@vermont.gov) if you are in need of these services.

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## INTRODUCTION

The State of Vermont recognizes that there are people with Language Access Needs living and working in Vermont and we are committed to ensuring equity, access, and belonging for all our customers. The Department of Labor and other WIOA Title I recipients in Vermont must provide meaningful access to programs and services to persons with limited English proficiency (LEP), hereafter referred to as persons with Language Access Needs (LAN), in accordance with Workforce Innovation and Opportunity Act (WIOA) Section 188 and its affiliated regulations.

Workforce system partners in Vermont are committed to promoting programs, activities, and services through an integrated system that complies with the equal opportunity and non-discrimination requirements. This Language Access Plan (LAP or Plan) acts as a guide to help WIOA Title I recipients meet the requirement to provide free (no-cost), linguistically-appropriate, accessible services for customers with Language Access Needs. No person should be denied access to any WIOA program, activity or service because they have Language Access Needs or communicate in English on a limited basis.

**All WIOA Title I recipients are required to meet the language access requirements found in [29 CFR § 38.9](#).**

The term “recipient,” as used in this Non-Discrimination Plan, is defined in the Code of Federal Regulations at [29 CFR 38.4\(zz\)](#):

*Recipient means entity to which financial assistance under Title I of WIOA is extended, directly from the Department or through the Governor or another recipient (including any successor, assignee, or transferee of a recipient). The term excludes any ultimate beneficiary of the WIOA Title I-financially assisted program or activity. In instances in which a Governor operates a program or activity, either directly or through a State agency, using discretionary funds apportioned to the Governor under WIOA Title I (rather than disbursing the funds to another recipient), the Governor is also a recipient. In addition, for purposes of this part, one-stop partners, as defined in section 121(b) of WIOA, are treated as “recipients,” and are subject to the nondiscrimination and equal opportunity requirements of this part, to the extent that they participate in the one-stop delivery system. “Recipient” includes, but is not limited to:*

- (1) State-level agencies that administer, or are financed in whole or in part with, WIOA Title I funds;*
- (2) State Workforce Agencies;*
- (3) State and Local Workforce Development Boards;*
- (4) LWDA grant recipients;*
- (5) One-stop operators;*
- (6) Service providers, including eligible training providers;*
- (7) On-the-Job Training (OJT) employers;*
- (8) Job Corps contractors and center operators;*
- (9) Job Corps national training contractors;*
- (10) Outreach and admissions agencies, including Job Corps contractors that perform these functions;*
- (11) Placement agencies, including Job Corps contractors that perform these functions;*
- (12) Other National Program recipients.*

### Updated terms used in the Language Access Plan

In order to align with best practices in our state, Vermont opted to replace the term “Limited English Proficiency (or LEP)” with “individuals with Language Access Needs” (LAN). LEP or “limited English proficiency” is a term commonly used by federal government sources and some State of Vermont sources to describe people who do not fluently speak or read English. The Vermont State Office of Racial Equity (ORE) does not recommend using “LEP” due to the biased nature of the term “limited English proficiency.”

Characterizing people solely by their lack of English proficiency may be disrespectful to their other language skills and inappropriately privileges English speakers above those who speak or sign other languages. Community feedback to ORE consistently supports using other terms as alternatives to “LEP” to describe people with language access needs. For more information, see page 15 of the [ORE Language Access Report](#).

### **Promoting statewide consistency**

In order to ensure consistency across the state, the LAP includes many references to the state’s Office of Racial Equity [2023 Language Access Report](#) and Vermont’s [WIOA Non-Discrimination Plan](#) (NDP). We highly recommend that WIOA Title I recipients use these three documents (the LAP, NDP and the state Language Access Report) as companion resources.

This document will be updated at least annually as new best practices and resources emerge. If you have any questions about the Plan, send us an email at [labor.eoofficer@vermont.gov](mailto:labor.eoofficer@vermont.gov).

## A. ENSURE MEANINGFUL AND TIMELY ACCESS

WIOA Title I recipients are required to take reasonable steps to provide language assistance so people with language access needs can fully understand, communicate, and participate in programs, services, and activities. All language assistance services, whether oral interpretation or written translation, must be accurate, provided in a timely manner and free of charge. Language assistance will be considered timely when it is provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training at issue.

### PROACTIVE STEPS TO ENSURE MEANINGFUL ACCESS

1. Review/update customer service procedures to make sure that when you meet customers for the first time, you are **asking them what their communication needs are** (see [Section B.](#) for additional guidance)
2. Ensure there is a place in the electronic and/or paper files where you can **document the customer's communication needs**. It should be in a prominent location so employees working with the customer know that they need to provide the necessary language access supports. Consider creating some kind of bookmark or notification tool to help make the communication need front and center. See the finding and recommendations related to updating software systems to capture language access needs in section 3.F of the Office of Racial Equity (ORE) [2023 Language Access Report](#).
3. Create a **tracking system that aggregates your customer's language access needs**. This could be a simple spreadsheet that lists the frequency and type of language access support provided. Include a column for entering your customer's primary language(s) so you can start to see aggregated information about who you are serving and where there may be gaps in service. Creating a tracking system for professional interpretation and translation services also allows you to discover trends, which will help, a) anticipate future needs so that upcoming program year budgets can include resources for language access; and b) identify customers that you serve whose primary language is not included on the state's list of [suggested languages for written translation](#). See the finding and recommendation related to language access data tracking in section 2.B and 2.C of the ORE Language Access Report
4. Ensure that your **vital documents, website, and other communications are accessible**. Go to the state's Chief Marketing Office [website](#) for guidance and resources. This includes ensuring that documents and website content is in [plain language](#). When communications are written in plain English, readers will be more likely to understand the content. Documents in plain English are much easier to translate into other languages. See Appendix B in the ORE Language Access Report for additional resources.
5. **Familiarize yourself with the languages** that are commonly spoken in Vermont. The state Chief Marketing Office keeps an updated list on their [website](#). The recommended languages are also listed in the ORE Language Access Report.
6. **Set up accounts with** professional oral interpretation or written translation services. Create a desk guide for all staff that includes instructions on how to access these services and include phone numbers, websites, and bill codes. Do not rely on an individual's minor child or adult family member or friend(s) to interpret or facilitate communication, except in an emergency situation while awaiting a qualified interpreter. (see [Sections C.](#) on interpretation services and [Section D.](#) on translation services for additional guidance)

7. **Prepare multilingual notices** to attach to important documents. The notice should communicate that the information in the document is important and free translation service is available. It should also include a phone number to call to request language access help (see [Section E](#) for additional guidance).
8. **Do regular outreach to groups with language access needs** to make sure that they are getting the support they need to participate in your programs. If needed, bring a professionally trained interpreter with you when you conduct in-person outreach. More information and resources can be found in Element 5 of the [WIOA Non-Discrimination Plan](#).
9. If not already part of your customer service procedures, **make sure that each new customer is receiving a copy of the [Equal Opportunity Notice](#)**, so they are informed of their rights and the procedures for filing a complaint. More information and resources can be found in Elements 3 and 7 of the WIOA Non-Discrimination Plan.
10. Provide regular **training on language access** to staff and other partners. See the finding and recommendation related to staff training in section 3.J of the ORE Language Access Report.

## B. ASK CUSTOMERS ABOUT COMMUNICATION NEEDS

In the first interaction with a customer, take the following best practice steps to ensure your customer's language access needs are identified and responded to in a timely manner.

1. When you first meet a customer, ask them about their communication needs.
  - a. What are your communication needs?
  - b. Do you use any assistive technology, such as:
    1. Screen reader
    2. Relay service (such as 711 or Video Relay)
    3. Screen magnification software
    4. Speech input software
    5. Alternative input devices, such as head pointers or eye tracking
    6. Interpreter
    7. Other, please specify
  - c. What is your primary language(s)? (You may want to use a "point to your language" poster to help the customer identify their primary language. Click [here](#) to see an example)
    - i. In what language do you prefer to use when **speaking or signing** with someone outside the home about important matters (such as medical or legal information)?
    - ii. In what language do you prefer to use when **reading** important matters (such as medical or legal information)?
    - iii. How well do you speak, read, and write English?
    - iv. If an interpreter is needed, do you prefer an in-person, phone, or video interpreter?
    - v. If you prefer an in-person interpreter, are there any local interpreters that you do or do not prefer to work with?

For more ideas about how to respectfully collect data and determine a customer's communication and accessibility needs, please see pp 33-38 of [Race, Ethnicity, Language and Disability \(REALD\) Implementation Guide](#).

2. Arrange for professional language access supports as soon as reasonably possible.
3. Document communication preferences or needs in their customer record to ensure that the preferences or needs are met in future communications.

## C. ARRANGE FOR PROFESSIONAL INTERPRETATION SERVICES

1. When an interpreter is needed, arrange for one that is professionally trained. If you are a state agency or department, contact one of the vendors who have a [statewide contract](#). For other organizations, make sure that you select a service provider who guarantees confidentiality and upholds [interpreter ethics](#). All WIOA recipients are obligated to provide free, professional interpretation services. Do not ask customers to provide their own interpreter.
2. Interpreters can be accessed by phone, over a video call, or, with notice, can be arranged for in-person. Phone interpretation services take only a few minutes to access. On-demand, remote sign language interpreters can also be arranged in a short amount of time.
3. Unless it is an immediate emergency, do not use minor children or family members as interpreters, as it may be impossible to maintain [impartiality and accuracy](#). If a customer indicates that they want to use a family member or friend to interpret, explain that your organization is required to provide a professional interpreter (at no cost to the customer), and that the family member or friend can attend the meeting to support them.
4. In a meeting that includes an interpreter:
  - a. Give interpreter time to introduce themselves at the beginning of the meeting, explain that everything will be kept confidential, and that the interpreter's job is to interpret everything that is said, without adding, subtracting, omitting, or giving advice.
  - b. Pause after each sentence or two. The interpreter will listen to what the speaker is saying and convey the message into the target language after the speaker has paused, typically after each sentence. Do not engage in side-conversations and remind others that only one person may speak at a time.
  - c. The interpreter may need to clarify with transparency. Interpreter will interrupt or raise their hand to ask the speaker to repeat something that was misheard or define a term that was not understood.
  - d. Be sure to write down the interpreter's name or identification number at the beginning of the meeting to document the use of a professional interpreter and provide feedback if necessary.
5. Do not ask interpreters to "sight translate". Sight translation is when an interpreter is asked to read a document (e.g. forms, educational material, etc.) out loud into the target language. Sight translation is a supplemental skill that requires different abilities than consecutive spoken interpreting. Sight translation is not as easy as it may look. If the staff needs to review written materials, the staff should read aloud the text from the form and ask the interpreter to interpret into the target language.
6. Remember that customers have various levels of literacy: Some customers with language access needs may not have the ability to read and understand written materials; therefore, oral or signed interpretation of written materials may be necessary. In this case, the staff should stay with the

interpreter and the customer to explain the content of the written materials and the interpreter should interpret what the staff is reading aloud. Staff must assist customers with language access needs who cannot read their primary language, no matter what that language is.

7. Provide an opportunity for the customer to provide feedback about the interpreter. Follow up with the organization that provided the interpreter about any issues/problems.

## D. ARRANGE FOR PROFESSIONAL TRANSLATION SERVICES

1. When written translation is needed, arrange for it to be done with a professional translation service. If you are a state agency or department, contact one of the vendors who have a [statewide contract](#). Other organizations should select a service provider who maintains documentation that their staff have been professionally trained, proof that their translators are competent in English and the target language(s) and are required to uphold confidentiality and maintain ethics. All WIOA recipients are obligated to provide free, professional translation services. Do not ask customers to arrange for their own document translation.
2. Provide the translated document to the customer as soon as reasonably possible. Consider other documents that the customer may need in the future and arrange for them to be translated so there is no (or very limited) disruption in service.
3. Consider translating all of your important and vital documents into the multiple languages spoken in Vermont, especially if you have documents with content that doesn't change very often. Start a library of translated documents so they are easily accessible when needed. Make translated documents available on your website. See the related finding and recommendation in section 4.A of the ORE Language Access Report.
4. In the 2023 Language Access Report, the Vermont Office of Racial Equity recommends translating notices of the availability of language assistance into the following languages, listed in alphabetical order
  - American Sign Language (ASL)
  - Arabic
  - Bosnian
  - Burmese
  - Dari
  - French
  - Kirundi
  - Simplified Chinese
  - Nepali
  - Pashto
  - Somali
  - Spanish
  - Swahili
  - Ukrainian
  - Vietnamese
5. Consider following the "[Seven Step Language Translation Process](#)" suggested by state Chief Marketing Office.



## E. CONTINUOUSLY EVALUATE LANGUAGES NEEDED FOR TRANSLATION

Vermont chooses not to use census data as the primary method for determining the most common languages spoken in our state. According to the [U.S. Census](#), >99% of Vermont's population 5 years of age and older speaks only English at home. This figure likely undercounts the population of Vermonters with language access needs. For example, some people may not feel comfortable interacting with government officials (i.e., census workers), especially if they are undocumented. Additionally, the U.S. Census groups all Central, Eastern, and Southern African languages into one category, making it difficult to differentiate between Kirundi- and Swahili-speakers.

Given that the US Census data is not reflective of the actual population of Vermonters with language access needs, Vermont has a several-step approach to identify the appropriate languages for translation of the equal opportunity notice and other vital documents:

1. The Vermont Agency of Human Service (AHS) has a working group called the AHS Language Access Committee (formerly known as "LEP Committee"), made up of State employees who provide services to people who speak or sign languages other than English from within AHS and other State Executive branch agencies, such as the Vermont Department of Labor (VDOL). The AHS Language Access Committee meets regularly to discuss language access services across the agencies that regularly provide services to people with language access needs. The committee is chaired by the director of the State's Refugee Office. The AHS Language Access Committee maintains a list of the languages that members report are most used by clients of state programs who speak or sign languages other than English. This list is found on the [Vermont Chief Marketing Office Language Access Guidance webpage](#).
2. The Vermont Office of Racial Equity (ORE) conducted extensive research with state agencies and community partners to report on the diversity and prevalence of languages spoken and signed in Vermont. The ORE generated a list in the [Office of Racial Equity Language Access Report](#) but cautions that each agency should research the linguistic needs of their own customers.
3. The State EO Officer and their support staff continue to learn about trends in newly arriving temporary workers and (im)migrant populations and their language access needs by liaising with statewide and local advocacy groups. These groups include (but are not limited to):
  - [AALV](#)
  - [Central Vermont Refugee Action Network \(CVRAN\)](#)
  - [Chittenden Asylum Seekers Assistance Network \(CASAN\)](#)
  - [Ethiopian Community Development Council \(ECDC\)](#)
  - [Migrant Justice](#)
  - Refugee and Immigrant Service Provider Network (facilitated by the [State Refugee Office](#))
  - [U.S. Committee for Refugees and Immigrants \(USCRI\)](#)
  - [Vermont Asylum Assistance Project \(VAAP\)](#)
  - [Vermont Language Justice Project](#)
4. As data collection practices improve, systems become modernized, and affirmative outreach efforts expand, we will continue to evaluate the languages spoken or signed by our service populations and plan translations accordingly. In the meantime, the State and other recipients have tools available to inform participants of their right to timely, accurate, and linguistically appropriate services, such as:
  - [Babel Notice](#)
  - [Language Identification Poster](#)

## F. PROVIDE MULTI-LINGUAL NOTICE OF FREE LANGUAGE ACCESS SERVICES

All WIOA Title I recipients must provide notice to customers that language access services are available. The message in the notice should be listed in English first and then in [all of the other languages recommended by the Office of Racial Equity](#) (ORE) plus any other languages your customers speak and/or read. To see an example of a multilingual notice about available interpretation services, [click here](#).

When communicating written, vital information, include/attach a notice that explains the importance of the document, the availability of no cost (free) language assistance and a phone number to call to request assistance. [Click here](#) to see an example of a multilingual notice (Babel Notice) from the Vermont Department of Labor.

Vital information includes complaint processes and forms, program applications and documents that include service deadlines or rights to appeal. For more examples, see a list of [vital documents](#) from the state Chief Marketing Office. The ORE [2023 Language Access Report](#) also includes a definition and examples of vital documents in the Federal Requirements for the Provision of Language Access Services section at the beginning of the report.

[Section \(g\)](#) of 29 CFR 38.9 describes the WIOA Title I requirements related to vital information and multilingual notices:

(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.

(3) Recipients must include a “Babel notice,” indicating in appropriate languages that language assistance is available, in all communications of vital information, such as hard copy letters or decisions or those communications posted on Web sites.

## G. GLOSSARY OF TERMS

**Auxiliary Aids and Services** (as defined in [29 CFR 38.4\(h\)](#)) - Qualified interpreters on-site or through video remote interpreting (VRI) services; notetakers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective means of making aurally delivered materials available to individuals with hearing impairments;

(2) Qualified readers; taped texts; audio recordings; Brailled materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;

(3) Acquisition or modification of equipment or devices; and

(4) Other similar services, devices, and actions.

**Babel Notice** (as defined in [29 CFR 38.4\(i\)](#)) - A short notice included in a document or electronic medium (e.g., Web site, “app,” email) in multiple languages informing the reader that the communication contains vital information, and explaining how to access language services to have the contents of the communication provided in other languages.

**Communicative Autonomy** - The capacity of each party in an encounter to be responsible for and in control of his or her own communication. In practical terms, communicative autonomy means that each person retains the ability to make informed decisions on their own behalf and communicate their feelings accurately with people who do not speak the same language as them. Communicative autonomy is only preserved when interpreters accurately communicate the feelings and intentions behind the words used, without leaving out any uncomfortable information. Failing to maintain communicative autonomy can have life-altering consequences, especially in medical and legal contexts.

**Effective communication** – Effective communication occurs when WIOA recipient staff have taken the necessary steps to make sure that a person with Language Access Needs is given adequate information to understand the services and benefits available and receives the benefits for which they are eligible. Effective communication also means that a person with Language Access Needs is able to communicate the relevant circumstances of his/her situation to the provider.

**Language Access Services / Language Assistance Services** - The provision of assistance to someone with communication access needs and notices about the availability of such services. Some examples of language assistance services include, but are not limited to: notices of the availability of interpretation services, use of an interpreter (which may include hearing and Deaf interpreters in the case of signed languages), written or audio/visual translation, the use of assistive hearing technology to facilitate communication between someone who is hearing and a person with hearing loss, and the use of “I Speak” cards to determine what language a person speaks when requesting an interpreter.

**Language Access Needs / Limited English Proficiency (LEP)** - A person with limited English proficiency or “LEP” is not able to speak, read, write, or understand the English language well enough to allow him/her to interact effectively. The State of Vermont’s Office of Racial Equity recommends using the term “Language Access Needs”. “LEP” or “limited English proficiency” is a term commonly used by federal government sources and some State of Vermont sources to describe people who do not fluently speak or read English. The Office of Racial Equity does not recommend using “LEP” due to the biased nature of the term “limited English proficiency.” Characterizing people solely by their lack of English proficiency is disrespectful to their other language skills and inappropriately privileges English speakers above those who speak or sign other languages. Furthermore, the legal and ethical responsibility for providing language access services falls on the State. Using the alternate phrases “people with language access needs” or “people with communication access needs” reminds State employees of our responsibility to provide those services. “People with communication access needs,” and “people with language access needs” are terms used throughout this document except when referencing materials created by other entities that use the term “LEP.” Find more information on specific terms for D/deaf, DeafBlind/deafblind, late deafened, DeafPlus, DeafDisabled, and

Hard of Hearing people at the [Vermont Department of Disabilities, Aging & Independent Living \(DAIL\) Hearing Terminology](#) website.

**Interpretation** - the practice of communicating the meaning of different languages between parties who do not speak and/or sign the same language. A person who provides interpretation services is called an interpreter. The State of Vermont maintains contracts with agencies that hire professionally-trained interpreters to be in-person, over the phone, or over remote video.

**Meaningful access** - Meaningful access to programs and services is the standard of access required of federally funded entities and their sub recipients to ensure meaningful access for people with Language Access Needs. Service providers must make available to applicants/recipients, at no cost to them, language assistance that results in accurate and effective communication.

**Plain Language** – “writing that an audience can understand easily the first time they read or hear it.” Plain language uses simple sentence structure, active rather than passive voice, and other features that make the writing easy to understand. Plain language is easier to read for people with cognitive, developmental, or learning disabilities. Before getting vital documents translated, it is best practice to convert complex language into plain language so that the text can be more easily understood. Please note that some required language cannot be converted into plain language, such as the [Equal Opportunity Notice](#). More resources are available at [plainlanguage.gov](#).

**Primary language(s)** – the language(s) that is most commonly spoken or signed by a customer.

**Translation** - written transfer of a message from one language into another language. Translators are expected to translate text in a way that conveys meaning while maintaining confidentiality.

**Online Translation Software**, also known as Machine Translation: software or online applications that automatically translate written material from one language to another without the involvement of a human translator or reviewer. Machine Translation Examples include Google Translate, Microsoft Translator in Office, and Bing Toolbar. Recipients need to provide linguistically-appropriate written materials when requested that have been reviewed by a professionally-trained, human translator, and should not rely on online translation services alone (which may be inaccurate).

**Sight Translation** - Sight translation is when an interpreter is asked to read a document (e.g. forms, educational material, etc.) out loud into the target language. Sight translation is a supplemental skill that requires different abilities than consecutive spoken interpreting. Sight translation is not as easy as it may look. The service provider should read aloud the text from the form and ask the interpreter to interpret into the target language.

**Video Remote Interpretation** – “A video telecommunication system that uses devices such as tablets, computers, web cameras or videophones to provide spoken [and sign] language through remote, off-site interpreters” (Vermont Judiciary, 2021c). Note that a stable, reliable internet connection is a necessary condition for using video remote interpretation as participants need to see the hands and facial expressions of all signers and speakers.

**Vital Document** – public-facing, non-confidential paper or electronic written material that contains information that is critical for accessing an agency’s programs or activities or is required by law. See <https://cmo.vermont.gov/brand/accessible-communications/language-access-guidance-summary#step-seven-translate-vital-documents> for examples of documents that should be translated.

## E. ADDITIONAL REQUIREMENTS & RESOURCES

The following are additional statutory, other legal requirements and resources related to service people with Language Access Needs:

[Title VI of the Civil Rights Act of 1964 and its amendments](#), which states: “No person in the United States shall on the ground of race, color or national origin, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.”

[Executive Order 13166](#), *Improving Access to Services for Persons with Limited English Proficiency*, was issued in 2000. This Order directs Federal agencies to work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

[U.S. Department of Justice \(DOJ\)](#) Under DOJ regulations implementing Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. (Title VI), recipients of federal financial assistance have a responsibility to ensure meaningful access to their programs and activities by persons with limited English proficiency (LEP). See 28 CFR 42.104(b)(2).

[U.S. Department of Labor \(USDOL\)](#) Civil Rights Center; Enforcement of Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Recipients. Issued May 29, 2003.

[Workforce Innovation and Opportunity Act \(WIOA\)](#) Nondiscrimination and Equal Opportunity and its implementing regulations. The Civil Rights Center (CRC), Department of Labor, is assigned monitoring and enforcement responsibilities for the nondiscrimination and equal opportunity provisions of WIOA. For details, view at [Code of Federal Regulations 29 CFR Part 38](#).

[State of Vermont Office of Racial Equity 2023 Language Access Report](#) This report is a comprehensive summary of the language access policy and procedural recommendations generated through Office of Racial Equity (ORE) community outreach efforts along with guidelines for creating language access plans and policies in the state of Vermont.

[U.S. Department of Labor Language Access Plan \(dol.gov\)](#) This document outlines the U.S. Department of Labor’s (USDOL) plan for conducting linguistically appropriate outreach and engagement and improving language access services in order to ensure that all communities can meaningfully participate in USDOL affiliated programs.

[Vermont Judiciary Language Access Operations Manual \(vermontjudiciary.org\)](#) This Manual outlines procedures and guidelines to ensure all individuals, regardless of their communication needs, have meaningful access to the Judiciary’s programs and services, and includes definitions, roles of interpreters, modes of interpretation, and best practices for judiciary staff. The Manual emphasizes the importance of using qualified interpreters, outlines the process for translating vital documents, and offers a way for customers to provide feedback and request an interpreter on the [Resources](#) page.

[Inclusive Language Guide \(apa.org\)](#) The American Psychological Association’s Inclusive Language Guide emphasizes the power of language in either harming or supporting marginalized communities and offers guidance on using culturally sensitive and respectful terms. It is a living document meant to raise awareness, promote continual learning, and reflect evolving language practices, particularly within a U.S. context.

[Hearing Terminologies \(dail.vermont.gov\)](#) This guide provides overview of appropriate and inappropriate terms related to hearing loss and the Deaf community, such as "Deaf," "deaf," "Hard of Hearing," and

"deafblind," explaining their meanings and how individuals may identify themselves. It emphasizes asking individuals how they prefer to be identified and offers guidance on understanding different degrees of hearing loss.

[Race, Ethnicity, Language and Disability \(REALD\) Implementation Guide](#) REALD is an effort to increase and standardize race, ethnicity, language, and disability data collection across the Department of Human Services (DHS) and the Oregon Health Authority (OHA). The guide outlines the importance of this data in addressing health inequities, providing culturally specific services, and ensuring equitable resource allocation. It includes detailed guidelines on data collection, analysis, reporting, and community engagement, emphasizing the need for accurate and granular data to better serve diverse populations in Oregon.