

# Language Access Plan for Limited English Proficiency Individuals

## Prepared by:

Pennsylvania Department of Human Services

Bureau of Equal Opportunity (BEO) – Civil Right Compliance

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Language Access Plan for the Pennsylvania Department of Human Services and for all Individuals with Limited English Proficiency (LEP)

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#### I. Introduction

On August 11, 2000, President William J. Clinton signed an executive order, *Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964.* The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The executive order stated that individuals with a limited ability to read, write, speak, and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. This is also known as language access These individuals are limited in their ability to speak, read, write, or understand English, hence the designation, Limited English Proficient (LEP). The executive order states that:

"Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities."

Not only are all federally funded agencies required to develop LEP plans as a condition of receiving federal financial assistance, recipients, including the Pennsylvania Department of Human Services (DHS), must comply with Title VI and LEP guidelines of the federal agency from which funds are provided as well.

Federal financial assistance includes grants, training, use of equipment, and other assistance. Recipients of federal funds range from state and local agencies to nonprofits and privately-owned organizations. Title VI covers the recipient's entire program or activity (i.e., to all parts of a recipient's operations). This means all parts of a recipient's operations are covered, even if only one part of the recipient's organization receives the federal assistance. In DHS, this includes:

- Department offices, bureaus, and programs, including County Assistance Offices (CAOs);
- Department-owned facilities such as state hospitals, state centers, and juvenile justice facilities;
- DHS-licensed providers; and,
- Managed Care Organizations (MCOs).

DHS is responsible for providing and ensuring access to language access services to all recipients of DHS services. Language access means providing individuals with LEP reasonable access to the same services as proficient English-speaking individuals. In addition, it is DHS' policy to provide equally effective communication to individuals who are deaf or hard of hearing, in part by providing American Sign Language interpreters at no cost.

## II. Elements of an Effective LEP Policy and DHS' Strategy

The Civil Rights Division of the Department of Justice (DOJ) has developed a set of elements that may be helpful in designing an LEP policy or plan. For the purposes of this plan, only those individuals who were identified in the 2020 U.S. Census as having their ability to speak English as "less than very well," "not well," or "not at all" are considered. DHS' LEP Plan addresses these elements to aid in identifying LEP persons so that they are provided meaningful access to DHS' services and activities that may affect their quality of life. These elements include:

#### 1. Identifying LEP persons who need language assistance.

According to the 2020 U.S. Census, 11.4% citizens of the Commonwealth of Pennsylvania ages 5 or older spoke a language other than English at home. Of that number, 38% speak English less than "very well."

#### 2. Identifying ways in which language assistance will be provided.

DHS will provide oral interpretation, written translation, and/or sign language interpretation if requested, identified, or because of an LEP-analysis on any given project or projected program requiring translation or interpretation.

DHS will examine its services yearly to determine the extent of contact or the possibility of contact with individuals with LEP and the frequency of contact and the services where individuals with LEP are likely to assess a program, service, or activity as needed. Data from the Office of Income Maintenance, civil rights compliance reviews, and the Bureau of Equal Opportunity (BEO) complaints will be information used to identify contact. There may be additional information used such as correspondence from program offices or LEP coordinators that identify a need.

#### 3. Training staff and others.

All DHS staff are required to complete the web-based LEP training annually. The training is titled "Serving People with Limited English Proficiency (LEP)." Although this training is vital for staff performing work in customer service, public outreach, and public

involvement, it is essential that all DHS staff understand the important of Language Access Services for Pennsylvanians that are limited in their English proficiency and in need of DHS services. The LEP training focuses on:

- Why language translation and interpretation services are needed;
- Identifying people with LEP who need language translation or interpretation services;
- How to include an interpreter in the conversation with your customer who has LEP; and,
- How to find additional information about language translation and interpretation services.

## 4. Providing notice to people with LEP.

After LEP populations have been identified, strategies will be developed by the Bureau of Equal Opportunity's Language Access Coordinator to provide notice of a program, service, or activity using appropriate media, including brochures (also in languages other than English).

## **III. Policies and Principles**

It is the Department of Human Services' policy that individuals with limited English proficiency and individuals who are deaf or hard of hearing have meaningful access to the services, programs, and activities of DHS or services, programs and activities administered or licensed by DHS. This plan also poses as a guide for DHS-licensed providers and Managed Care Organizations (MCOs).

The plan describes specific steps that DHS will take to ensure meaningful access. The standards set forth are guided by the following principles:

- DHS is responsible for early identification of the need for language services, including, among other things, providing timely and effective notice to those in need of such services. This will be done through the Office of Income Maintenance statistic reports, most recent Census data, LEP complaints, and quarterly meetings with LEP Coordinators
- 2. DHS must provide interpretation and translation services at no cost to the individual or household.
- 3. DHS must provide language services in a timely manner.

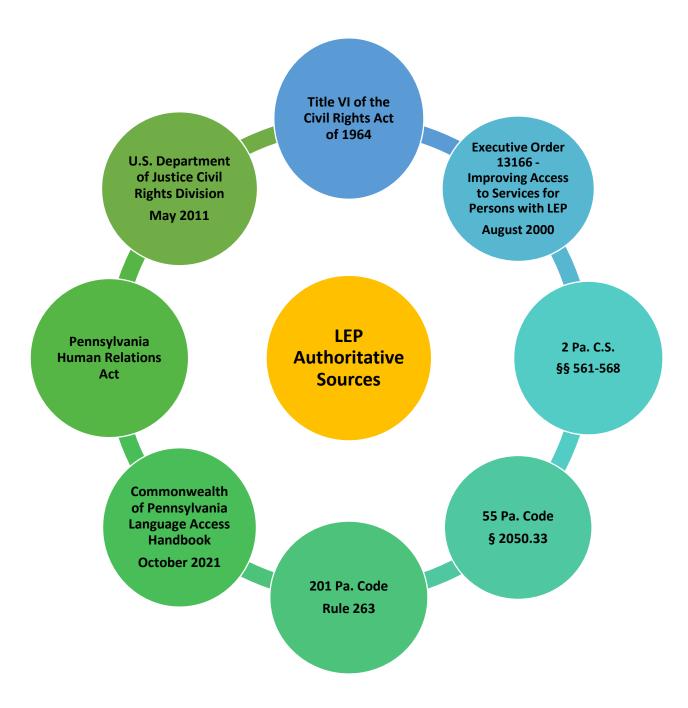
- 4. DHS will provide interpretation or translation services for individuals who request one at no cost.
- 5. Interpreter services will be offered, even if not requested, where the need is apparent or where the ability of a person to understand and communicate in English is unclear.
- 6. Individuals who are LEP, deaf, or hard of hearing should not be expected to use informal interpreters, such as family members.
- 7. To be effective, there should be a consistent and regular review process for the provision of translated materials, including "vital" DHS documents and forms. Vital documents and forms include those:
  - 1) Containing or soliciting information critical for obtaining DHS services and benefits:
  - 2) Advising of or affecting the rights or responsibilities; and,
  - 3) Required by law.
- 8. "Plain language" is defined as language that is communicated with an audience that can be understood the first time they read or hear it. "Plain language" is an important aspect of ensuring language access. DHS will strive to communicate with the public using language that is easy-to-read, clear, and concise.
- 9. DHS will incorporate and standardize language services in the regular course of business.
- 10. DHS staff will complete the Commonwealth's "Serving People with Limited English Proficiency (LEP)" web-based training on an annual basis. This training is especially vital for staff involved in customer service, public outreach, and public involvement.
- 11.At least once every 3 years or as needed, an updated LEP Policy Statement will explain the responsibility of each program office to ensure through its contracts, grants, or other agreements, that contractors, subcontractors, grantees, and subgrantees are providing meaningful access to benefits and services for individuals with LEP. This statement will be posted on:
  - DHS, Office of Administration, Bureau of Equal Opportunity Language Service Intranet Site
  - DHS, Office of Administration, Bureau of Equal Opportunity Language Services Page

 Bulletin boards across DHS sites where the public and staff can view the policy statement.

## IV. Scope and Authority

The plan applies to the Pennsylvania Department of Human Services, its programs, and staff. The plan establishes policies that rely on guidance contained in statutes or regulations promulgated under Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act, and Pennsylvania Act 172 of 2006, and other authoritative sources shown below. The plan is consistent with other federal and state laws and regulations as well as good management practices. Enterprise-wide resources on language access services can be found at Language Access IT Central.

## **V. LEP Authoritative Sources**



### **VI. Definitions**

- Bilingual The knowledge and ability to understand, read, and write fluently in two languages.
- Certified Interpreter/Translator A person who has passed the required language fluency examination in the certified languages or has passed a recognized written translation examination offered by another organization (e.g., American Translators Association, IATPI, etc.). The person must understand the client's culture and be able to integrate that understanding into the translation of written material.
- Executive Order 13166 Signed by President Clinton in August 2000, this order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries and thus not discriminate based on national origin in violation of Title VI's prohibition against national origin discrimination.
- Effective Communication Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communications with others when providing similar programs and services.
- **Four-factor Analysis** An assessment to assist agencies and programs in determining how to provide meaningful access. These factors include:
  - 1. The number and proportion of LEP persons served or encountered.
  - 2. The frequency with which LEP individuals encounter the program or service.
  - 3. The importance of the document and program to the LEP persons' lives.
  - 4. The resources available to the program and costs associated with translation.
- **In-language** Refers to services provided in a language other than English, without the aid of an interpreter. Someone who is multilingual and not qualified to interpret may still be able to provide services in-language.

- Interpretation The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text. As a result, interpretation requires skills different from those needed for translation. From the standpoint of the user, a successful interpretation is one that faithfully and accurately conveys the meaning of the source language orally, reflecting the style, register and cultural context of the source message, without omissions, additions, or embellishments on the part of the interpreter.
- Language Access Language assistance that results in accurate, timely, and effective communication at no cost to the person with limited English proficiency.
- Language Access Coordinator The designated staff person in DHS ("the
  coordinator") responsible for devising and ensuring that the agency adheres to its
  language access policy directives, plan, and procedures to provide meaningful
  access to LEP persons. The language access coordinator should be or report to
  a high-ranking official within the agency since high level support is essential to
  successful implementation. The coordinator is responsible for language
  assistance services and may delegate duties but should retain oversight,
  performance, and implementation of the language access plan. Agencies with
  multiple offices and divisions may designate an individual as a local language
  access coordinator. The coordinator is responsible for:
  - 1. Overseeing DHS' Language Access Plan, making revisions as needed to keep it current;
  - 2. Ensuring that program offices establish an LEP plan and operate in compliance with the LEP policy;
  - 3. Maintaining a database of qualified interpreters and translators;
  - 4. Providing training and technical assistance on how to utilize language assistance services; and,
  - 5. Considering new resources including collaborations with other agencies, human resources, and other mechanisms for ensuring improved access for LEP individuals.
- Language Services Refers to the services provided by DHS to assist people who are limited English proficient and/or deaf or hard of hearing. This includes interpretation and translation services.
- Limited English Proficiency (LEP) Individuals who do not speak English as their primary language and who have a limited ability or no ability to read, write, speak, or understand English. Persons with limited English proficiency may be

competent in English for certain types of communication but still have LEP for other purposes. United States citizenship does not determine whether a person has LEP.

- Limited English Proficiency Coordinator The designated staff person at the bureau or program office level ("LEP Coordinator") responsible for guiding and tracking the implementation of the Language Access Plan locally, and communicating issues and challenges related to implementation to the Language Access Coordinator. LEP Coordinator responsibilities include:
  - 1. Being knowledgeable about the Language Access Plan and language services;
  - 2. Maintaining an LEP resource file;
  - 3. Monitoring provision of LEP training for both newly hired and existing DHS staff in their bureau or program;
  - Conferring with the Language Access Coordinator to provide technical assistance regarding compliance with LEP requirements of Title VI of the Civil Rights Act and Executive Order 13166;
  - 5. Monitoring their bureau's or program office's compliance with LEP requirements as outlined in this plan;
  - 6. Monitoring the provision of notice of free interpretation and translation services through posters and flyers;
  - 7. Collecting and reporting data regarding use of language services (i.e., LEP encounter log);
  - 8. Bringing issues related to language services to the designated bureau or program coordinator's attention; and,
  - 9. Collecting and reporting data to the Language Access Coordinator from the designated program or bureau coordinators.
- Meaningful Access Language assistance that results in accurate, timely, and
  effective communication at no cost to the individual who is LEP. For individuals
  with LEP, meaningful access denotes access that is not significantly restricted,
  delayed, or inferior as compared to programs or activities provided to individuals
  who are proficient in English.
- Multilingual An individual who could use more than one language. A
  multilingual person can learn to become a translator or an interpreter but is not
  automatically so qualified by virtue of their language abilities. For instance, a
  multilingual person may be fluent and well suited to having direct monolingual
  conversations (e.g., Spanish to Spanish and English to English conversations) in
  more than one language but may not be skilled at converting those conversations
  from one language to another.

- Plain Language Communication that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience.
- **Primary Language** The language in which an individual is most effectively able to communicate or an individual's native language.
- **Translation** The replacement of written text from one language with an equivalent written text in another language while retaining the same meaning.
- Vital Document A document that contains information that is critical for obtaining federal or state services or benefits. Vital documents may include, but are not limited to, application materials, complaint forms, documents that include an acknowledgment, release, or waiver, and notices concerning program eligibility, program rules, or notices of termination.

## VII. Language Access Needs Assessment

## **Demographic Data**

According to estimates by the US Census Bureau, over 1.37 million (11.4%) Pennsylvania residents speak a language other than English at home. Over 520,000 speak another language at home, and do not speak English very well. Spanish is the most common language after English, with Spanish speakers making up close to 44% of limited English proficient persons in Pennsylvania. The next most spoken language in Pennsylvania is Chinese (including its dialects), followed by West Germanic languages, including Yiddish and Pennsylvania Dutch. Refer to Appendix A for a list of the top 10 most common languages among people who are limited English proficient in Pennsylvania.

The Pennsylvania Department of Labor and Industry's Office for the Deaf and Hard of Hearing estimates that 1.1 million Pennsylvanians suffer from hearing loss.<sup>2</sup> Recent Census data indicates that almost 4% of Pennsylvanians over 18 are deaf or hard of

<sup>&</sup>lt;sup>1</sup> US Census Bureau, 2019 American Community Survey 5-Year Estimates, Table DP02.

<sup>&</sup>lt;sup>2</sup> U.S. Census Bureau, 2014 estimate of Pennsylvania population 2011 Center for Disease Control, Early Hearing Detection & Intervention Screening & Follow-up Survey (HSFS

hearing,<sup>3</sup> while a 2011 report from researchers at Johns Hopkins estimate that about 30 million Americans, or 12.7 percent of the population, had hearing loss in both ears.<sup>4</sup>

## **VIII. Language Access Resources**

DHS employs a variety of resources to provide services to people who use sign language and people who are limited English proficient. They are described below.

## A. Telephone Relay Services

Persons with a hearing or speech disability may contact the DHS using a telecommunications relay service, which is available free of charge by dialing 711. DHS staff also have access to this relay service to communicate with persons who use a text telephone (TTY) or similar device to communicate over the phone.

711 abbreviated dialing went into effect in Pennsylvania on May 1, 2000. The Pennsylvania Telecommunications Relay Service (TRS) has various 10-digit numbers that will continue to be used in conjunction with 711 - these numbers are not being replaced by 711 abbreviated dialing.

PA TTY 800-654-5984
PA Voice 800-654-5988
PA Speech-to-Speech 844-308-9292
PA Spanish 844-308-9291

## **B. Language Services Contracts**

The Department of Human Services uses statewide contracts to provide interpretation and translation services. The Department of General Services' Bureau of Procurement manages these contracts, which offer:

- Over-the-phone Interpretation;
- In-person Interpretation;
- Non-English Translation, Authentication of Documents to include Desktop Publishing; and
- Sign Language Interpretation and Transliteration Services.

Additional information on statewide contracts for interpretation and translation services can be found at <a href="https://www.emarketplace.state.pa.us">www.emarketplace.state.pa.us</a>. Note: use "Search Contracts" feature,

<sup>&</sup>lt;sup>3</sup> US Census Bureau, 2016 American Community Survey 5-Year Estimates, Table B18102.

<sup>&</sup>lt;sup>4</sup> "One in Five Americans Has Hearing Loss." Nov. 2011. https://www.hopkinsmedicine.org/news/media/releases/one in five americans has hearing loss

search by description, using the word "translation." For DHS forms or publications that need to be revised or translated, please consult with your program office's Forms & Publications Coordinator (FPC). Your FPC can work with DHS' Bureau of Administrative Services Management Services Team to get your forms and publications revised and/or translated.

## C. Multilingual Staff

Multilingual staff may serve as a resource to communicate with clients in-language. However, multilingual staff should not be called on to provide in-language services outside of their normal job duties. When there is no multilingual staff within a program area, interpreters should be used.

When there is a need for language services within a program area, hiring managers should consider whether those needs could be addressed by creating a multilingual position. Hiring managers should work with bureau heads and human resource personnel to assess and update job descriptions as appropriate.

## D. Safe Harbor Stipulation

Federal law provides a "safe harbor" provision so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English.

A "safe harbor" means that if a recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. DHS' translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

## IX. The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individual assessment considering the four factors outlined below. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to public services within the scope of DHS's services. Recommendations are then based on the results of the analysis.

# Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to be encountered at a DHS program, service, or activity.

The U.S. Census Bureau has a range of four classifications of how well people speak English. The classifications are (1) 'very well,' (2) 'well,' (3) 'not well,' and (4) 'not at all.' DHS considers individuals who speak English less than 'very well' Limited English Proficient, or LEP.

The table in appendix A shows a breakdown of Pennsylvania's population by race/ethnicity and the most common languages spoken in the Commonwealth which demonstrates the need to ensure that persons with LEP are included in the human services' public involvement process.

All programs/projects must consider the number and percent of persons regarding their English language skills within the planning area for inclusion in public involvement and public engagement meetings.

For each program, project, service, or activity, an assessment will be conducted to determine the number and type of LEP populations impacted to ensure meaningful public involvement.

# Factor 2: The frequency with which persons with LEP encounter a DHS program, activity, or service.

The program/project must be evaluated in relationship to the number of persons who are within the program/project area and the number of times they have frequented the program or activity.

Programs, services, and activities that have potential impact for persons with LEP include, but are not limited to:

- Public involvement and public engagement meetings for department projects affecting LEP communities or individuals;
- Administrative hearings and appeals;
- Systems and supports for Pennsylvania children and families;
- Recipients of DHS services and public assistance benefits;

- Internet access: DHS Web sites provides translation features;
- · Requests for certifications, licenses; and,
- Phone communications: notices/greetings in languages other than English.

# Factor 3: The Nature and Importance of the Program, Activity, or Service by DHS to the LEP population

Services and benefits administered by DHS to provide care and support to Pennsylvania's most vulnerable individuals and families. In some of these programs, recipients of services, including people with LEP, are likely to have considerable contact with grantees and their staff. Grantees must assess their chosen activities to determine the frequency with which people with LEP may encounter their programs.

#### **Decision Point**

- ➤ If the grantee's project provides direct assistance to program and activity service area beneficiaries, then the grantee will move on to developing the LAP and does not need to go through Factor 4.
- If it does <u>not</u>, then it will move on to Factor 4 in the analysis.

## Factor 4: Assess the Resources Available and Costs to the Recipient.

DHS serves the entire Commonwealth of Pennsylvania and is required by federal law to provide access to people with LEP, and to ensure that its sub-recipients also provide access. There are many best practices that have been established in making resources available to people with LEP. DHS has determined that with the available translation websites, translated documents available from HUD and other federal websites, and the eligible use of administrative and delivery dollars from certain programs, grantees can deliver language access at a reasonable cost. DHS has made available to grantees templates of vital documents translated into the most common languages spoken in the Commonwealth – Spanish, Simplified Chinese (to cover Mandarin/Cantonese), Vietnamese, and Cambodian/Khmer, Russian, and Arabic. Grantees may use these templates as they apply but may need to create their own translations into other languages based on their community needs.

DHS has determined that grantees may not use this factor as the only factor to determine the need for a Language Access Plan (LAP).

### **Decision Point**

➤ If the grantee determines that none of the factors apply to it and its program, then it will need to certify that it does not need to develop an LAP, however, it is

expected that the grantee will make reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation and for other materials.

## X. Language Access Plan for Grantees

If while answering the questions in a Four Factor-Analysis, the result is that the grantee must develop an LAP, then it should follow the guidelines below for what to include to meet its community's needs. The LAP is the guiding document that ensures not only that access to programs is provided to individuals that may have LEP, but that the resources to do so are available.

Although DHS has established that Factor 4, cost, cannot alone determine the need for an LAP, the following "safe harbor" provisions for written materials will be followed:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translate vital documents.
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translate vital documents.
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translate written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

There is no "safe harbor" for oral interpretation services. Grantees must use the Four-Factor Analysis to determine what is a reasonable provision of these services.

Once the Four-Factor Analysis is complete, the LAP needs to articulate what actions the grantee will take to meet the Title VI requirement of providing access to LEP persons. An LAP is essentially an implementation document. The implementing actions can take many different forms, but some best practices for consideration include:

- Identifying the language assistance that is most needed in the community;
   Developing relationships with organizations that work with or represent LEP persons to outreach effectively to the LEP community;
- Training staff;

- Identifying vital documents that need to be translated;
- Translating informational materials in identified language(s) that detail services and activities provided to beneficiaries;
- Providing appropriately translated notices to people with LEP (e.g., eviction notices, security information, emergency plans);
- Providing interpreters for large, medium, small, and one-on-one meetings;
- Developing community resources, partnerships, and other relationships to help with the provision of language services; and,
- Making provisions for monitoring and updating the LAP, including seeking input from beneficiaries and the community on how it is working and on what other actions should be taken.

## XI. Operational Plan

## A. Language Access Roles and Assignments

## **Language Access Coordinator**

The Language Access Coordinator ("the coordinator") for the Department of Human Services is responsible for drafting and maintaining the Language Access Plan. The coordinator is responsible for plan implementation and serves as a resource to the bureaus to help resolve issues that arise related to language access. The coordinator is designated by DHS' Office of Administration (OA) Deputy Secretary and works under the direction of the OA Deputy Secretary and Director of the DHS Bureau of Equal Opportunity – Civil Rights Compliance.

The Language Access Coordinator's responsibilities include:

- Provide training and useful LEP information to DHS staff through the dissemination of information in the LEP Coordinator meetings to the LEP Coordinators.
- Track and resolve issues related to language services.
- Maintain a database of DHS LEP Coordinators, qualified interpreters, and translators.
- Respond to language services complaints.
- Conduct regular data review.
- Keep current on community demographics and needs; and,
- Collect feedback from community organizations.

#### **LEP Coordinators**

DHS programs that primarily provide benefits and services to the public have Limited English Proficiency Coordinators ("LEP Coordinators"). These programs include, but are not limited to, the:

- Bureau of Equal Opportunity
- Bureau of Hearings and Appeals
- Office of Income Maintenance
- Office of Medical Assistance Programs
- Office of Mental Health and Substance Abuse Services
- Office of Developmental Programs
- Office of Children and Youth and Families
- Office of Long-Term Living
- Office of Child Development and Early Learning
- · Bureau of Hearing and Appeals
- State Facilities (e.g., South Mountain, Wernersville State Hospital, etc.)

DHS LEP Coordinators are responsible for guiding and tracking the implementation of the LAP at the bureau level, and communicating issues and challenges related to implementation to the Language Access Coordinator.

## **B. Training for Department Staff**

The Bureau of Equal Opportunity will routinely provide training to LEP Coordinators during LEP Coordinator meetings regarding language access policies and procedures. Training materials will also be posted on the BEO Intranet page.

The Language Access Coordinator offers training on the following topics:

- The LAP and its application;
- Telephone interpretation;
- Tips for working with interpreters;
- Plain language principles;
- Requesting document translation; and,
- Requesting in-person interpretation.

DHS staff are required to complete "Serving People with Limited English Proficiency" located in My Learning in ESS. The training should be offered to new employees by their direct supervisor during onboarding and offered to existing employees at once a year.

If additional training is needed, the Language Access Coordinator will work to accommodate those requests by working with other related program offices such as Human Resources.

## C. Language Interpretation

As a best practice and to safeguard against inaccurate and incomplete interpretation, professional interpreters should be used via the statewide contracts, rather than allowing the client to use a friend or family member as an interpreter. Children should never be used as interpreters. Multilingual staff may provide in-language services, but they should not be asked to interpret.

The Language Access Coordinator provides instructions to DHS staff for accessing interpretation services. Those instructions outline the steps staff must take to avoid errors and delays. Any concerns related to interpretation services should be reported to the coordinator.

## **Telephone Interpretation**

DHS provides telephone interpreting as needed at no cost to clients. All staff receive training on the use of telephone interpretation services.

It is common for clients who are deaf or hard of hearing to communicate over the phone using assistive equipment and/or a telephone relay service, available at no cost by dialing 711. DHS staff are trained to respond to such calls.

## **In-Person Interpretation**

The DHS provides in-person interpreters for in-person interactions as needed at no cost to the client. Staff should communicate to clients that it takes a minimum of two days to arrange for an in-person interpreter. For brief, unscheduled interactions with persons who are LEP, it may be appropriate to communicate using telephone interpretation over speaker phone. However, DHS staff must offer to provide an in-person interpreter when the client and staff cannot communicate effectively using telephone interpretation, or at the client's request.

For persons who use sign language, the DHS will arrange for in-person interpretation for in-person interactions when the client and DHS staff cannot communicate effectively, or at the client's request.

#### D. Document Translation

The Language Access Coordinator should work with the LEP Coordinators to conduct an annual inventory and assessment of the documents each bureau makes available to the public. The assessment will determine how each document will be prioritized for translation. DHS' Bureau of Administrative Services may also be able to provide an inventory list of the documents used by program offices in DHS.

DHS prioritizes the translation of vital documents, which are documents that clients must understand to access DHS services, that affect clients' rights, or are required by law. Documents that are considered "vital" may include:

- Application materials;
- Complaint forms;
- Forms that include an acknowledgment, release, or waiver;
- Notices concerning program eligibility, program rules, or notices of termination; and,
- Notices about the availability of language services.

In addition, documents are reviewed for translation based on the following four factors:

- 1. The number and proportion of people with LEP persons served or encountered;
- 2. The frequency with which people with LEP encounter the program or service;
- 3. The importance of the document and program to people with LEP; and,
- 4. The resources available to the program and costs associated with translation.

A document may be translated in response to a request from an individual, depending on the availability of DHS resources. DHS will acknowledge all requests for translation within ten (10) business days and respond to requests within a reasonable amount of time.

In some cases, when a document has not been translated, taglines may be attached to the document. Taglines are statements printed in languages other than English that alert clients to the availability of free language services.

Written document translation is performed by qualified translators using the statewide contracts for translation services. Multilingual staff should not be used to translate written documents. The Language Access Coordinator will provide written instructions to DHS staff for requesting document translations. Those instructions outline the steps that should be taken to assure the quality of translations, including verification by multiple vendors, and community review. Any concerns related to the quality of translations should be reported to the coordinator.

## E. Plain Language

Before any new document or other media is made available to the public or submitted for translation into another language, it must be reviewed for plain language by the author, the Office of Press & Communications, and Office of General Council. The plain language review ensures that public facing documents are clear, organized, and concise, using common words and short sentences. The Language Access Coordinator provides instructions for DHS staff to follow when conducting a plain language review.

#### F. Web Content

Web content refers to information DHS makes available on the internet, including written text, video recording, and audio recording. It includes content available on DHS website, other Commonwealth sites, and social media platforms.

DHS Office of Press and Communications and the Language Access Coordinator will review DHS produced web content to ensure it is accessible for people who are LEP or deaf or hard of hearing.

#### **Written Web Content**

After the adoption of this plan, all new written content created by the DHS must be reviewed for plain language before it is published online. This helps optimize machine translations produced by web browser or web page add-ons, such as Google Translate.

#### **Documents and Other Media**

When documents or other media published online are available in other languages, the page where the English media appears will prominently display links to the media in other languages.

DHS includes closed captions in English for all videos it produces, and may translate the captions into other languages, based on the result of the four-factor analysis.

#### G. Notice

DHS website includes a page dedicated to language access. Key components of this plan will be included in the web page contents so that they may be translated into other languages using the web page ad-on Google Translate. This plan is also available on the page in its entirety.

DHS makes the following notices available to the public:

- Each page of DHS website states that language services are available and provides a link to the DHS web page on language access.
- In each program or bureau that provides walk-in services, signs are posted in the most used languages that interpreters are available.

## XII. Monitoring and Evaluation

## A. Complaints

The Department of Human Services tracks and responds to complaints about the availability and quality of language services provided. All complaints of discrimination are to be submitted, forwarded, and referred to the Bureau of Equal Opportunity (BEO) to be investigated. Complaints may be submitted via phone, fax, email, or regular mail. Online submission of complaints is available as well through BEO's intranet and internet site. Complaints are received by the Language Access Coordinator and reviewed for

appropriate resolution. The Bureau of Equal Opportunity will acknowledge receipt of a complaint within ten (10) business days.

## **Bureau of Equal Opportunity**

Room 223-225 Health & Welfare Building

Harrisburg, Pennsylvania 17120 Email: RA-PWBEOAO@pa.gov

Tel: (717) 787-1127 Fax: (717) 772-4366 TDD: (717) 705-7772 (within 90 days of incident)

The Department of Human Services bureaus may also receive complaints related to language access directly via phone call or in-person. All complaints related to language services must be referred to the Bureau of Equal Opportunity. LEP complaints are reviewed to decide regarding an investigation, ensure federal compliance, identify trends and areas for improvement.

The Bureau of Equal Opportunity does not handle complaints from DHS Employees that allege discrimination, sexual harassment, or retaliation on the grounds of race, color, or national origin (includes persons with limited English proficiency, age, sex) against other Commonwealth of Pennsylvania Employees. If a DHS Employees has reason to believe that they are being discriminated against by another Commonwealth of Pennsylvania employee, they should contact the following entities:

# Commonwealth's Office of Administration Bureau of Equal Employment Opportunity Investigations

555 Walnut Street, Suite 701 Harrisburg, PA 17101 RA-OAEEOCOMPLAINT@pa.gov

Tel: (717) 783-1130 Fax: (717) 772-3302

#### **PA Human Relations Commission**

333 Market Street, 8<sup>th</sup> Floor Harrisburg, Pennsylvania 17101-2210 How to File a Complaint (pa.gov)

Tel: (717) 787-4410 Fax: (717) 214-0584

## **Equal Employment Opportunity Commission**

801 Market Street, Suite 1300 Philadelphia, Pennsylvania 19107 EEOC Complaint Portal Link Tel: (215) 440-2600 Fax: (717) 214-0584

#### **B.** Reporting

All information collected must be reported to the Language Access Coordinator through the bureau/program offices' designated LEP Coordinators. For the purposes of monitoring and evaluation, each bureau/program office (depending on size and amount of work performed in customer service, public relations, and public outreach) is responsible for recording the following information:

- 1. The number of non-English calls.
- 2. The number of requests for telephonic interpretation.
- 3. The number of requests for in-person interpretation.
- 4. The languages for which interpretation is requested.
- 5. The type of service being accessed in each instance that interpretation is provided.
- 6. The preferred language for clients submitting a form in person or online.
- 7. The preferred language for users of web applications.
- 8. The number and type of documents translated into non-English languages.

In addition, as a best practice, programs or bureaus should record information about the location of the persons requesting services. This may inform how resources are distributed in the future, or where to focus outreach activities.

Each LEP Coordinator must work with the Language Access Coordinator to implement standardized questions and data collection methods for requesting information from clients. The LEP Coordinators should also work with the Language Access Coordinator to identify other available information DHS may want to monitor. The coordinator will provide a standard template for reporting this information. This will be done through quarterly meetings between the Language Access Coordinator and the LEP Coordinators.

#### C. Internal Review

Monitoring involves regular re-assessment and priority-setting. The Language Access Coordinator works with each LEP Coordinator to identify needs and set goals and deadlines for regular review.

- Quarterly, the Language Access Coordinator will collect data through reports and analytics provided by the language services being used.
- Every six (6) months, the Language Access Coordinator will review the cost incurred by each program or bureau in the delivery of language services.

- Every six (6) months, the LEP Coordinators in program offices will review their documents for translation and provide an updated inventory to the LAP Coordinator.
- Once a year, the Language Access Coordinator and the LEP Coordinators meet to discuss successes, challenges, and goals for improvement.
- Once a year, the Department of Human Services Bureau of Equal Opportunity Civil Right Compliance and the OA Deputy Secretary's Office will conduct a formal review of the Language Access Plan implementation progress.
- Every two (2) years, the Language Access Plan will be formally reviewed, revised, and updated, if appropriate, to continually improve language access at DHS.

## D. Implementation Timeline

The following is the timeline for implementation of the Language Access Plan. It is contingent on staff, funding, and resource availability.

Within six (6) months after the Plan is effective, DHS will implement the following sections of this plan:

- Language Interpretation
- Notice
- Complaints
- Reporting
- Document Translation

Within one year after the plan is effective, DHS will implement the following sections of this plan:

- Plain Language
- Web Content

After one year, this plan will be fully operational.

## **Appendices**

## **Appendix A: Census Data**

## Languages other than English spoken at home in PA $^{\rm 4}$

	Language	# of people in PA	% of PA pop.
1.	Spanish	634,935	5.24%
2.	Chinese (incl. Mandarin, Cantonese)	90,890	0.75%
3.	Yiddish, Pennsylvania Dutch or other W. Germanic lang.	73,540	0.61%
4.	Arabic	41,849	0.35%
5.	German	38,716	0.32%
6.	Russian	38,055	0.31%
7.	French (incl. Cajun)	35,769	0.30%
8.	Italian	31,807	0.26%
9.	Korean	28,190	0.23%
10.	Vietnamese	28,105	0.23%
11.	Gujarati	24,716	0.20%
12.	Hindi	24,271	0.20%
13.	Yoruba, Twi, Igbo, or other lang. of Western Africa	23,234	0.19%
14.	Haitian	21,711	0.18%
15.	Nepali, Marathi, or other Indic lang.	20,883	0.17%
16.	Polish	20,043	0.17%
17.	Urdu	18,203	0.15%
18.	Other Indo-European lang.	18,134	0.15%
19.	Portuguese	16,206	0.13%
20.	Tagalog (incl. Filipino)	15,779	0.13%
21.	Malayalam, Kannada, or other Dravidian lang.	15,477	0.13%
22.	Tamil	14,465	0.12%
23.	Ukrainian or other Slavic lang.	14,361	0.12%
24.	Greek	12,994	0.11%
25.	Khmer	12,745	0.11%
26.	Telugu	12,476	0.10%
27.	Bengali	11,404	0.09%
28.	Other Languages of Asia	11,051	0.09%
29.	Other and unspecified lang.	10,831	0.09%
30.	Japanese	8567	0.07%
31.	Swahili or other lang. of Central, Eastern, and Southern Africa	8423	0.07%
32.	Serbo-Croatian	8326	0.07%
33.	Amharic, Somali, or other Afro-Asiatic languages	7571	0.06%
34.	Ilocano, Samoan, Hawaiian, or other Austronesian lang.	5,034	0.04%
35.	Thai, Lao, or other Tai-Kadai lang.	4989	0.04%
36.	Punjabi	4908	0.04%
37.	Persian (incl. Farsi, Dari)	4839	0.04%
38.	Hebrew	4215	0.03%
39.	Other Native lang. of North America	1493	0.01%
40.	Armenian	774	0.01%
41.	Hmong	434	0.00%
42.	Navajo	36	0.00%

<sup>4</sup> Source: U.S. Census Bureau, 2019 American Community Survey 5-Year Estimates

## **Appendix B: Supporting Documents**

The following documents are maintained by the Language Access Coordinator and are available to DHS staff via intranet. They will be made available to the public via the DHS's Language Access Page

- Language Access Plan (master copy)
- Telephonic Interpretation Training and Instruction Materials
- Instructions for Requesting an In-person Interpreter.
- Working with Interpreters Tip Sheet
- Instructions for Requesting Document Translation
- Instructions for Conducting a Plain Language Review

# Appendix C: Additional Guidance from HHS.GOV regarding providing LEP services during pandemic or other Health Emergencies

- Title VI Language Access Obligations <u>Civil Rights Resources for Recipients of</u> DHS Financial Assistance | Homeland Security
- Microsoft PowerPoint PPT Presentation LEP COVID Handout with Notes 508
   5.9.23 (dhs.gov)
- Special Topic devoted to LEP Resources <u>Limited English Proficiency (LEP)</u> | HHS.gov
- I Speak Card Link

## **Appendix D: DHS Limited English Proficiency Policy Statement**



Date: January 19, 2024
To: All DHS Employees

From: Valerie A. Arkoosh, Secretary

Regarding: Limited English Proficiency Policy Statement

In accordance with Title VI of the Civil Rights Act of 1964, the Department of Human Services (DHS) is committed to establishing and maintaining practices that ensure meaningful access to the department's services and benefits by persons with Limited English Proficiency (LEP). It is the policy of DHS to ensure that no person is denied access to services and benefits as the result of their inability or limited ability to communicate in the English language.

The Deputy Secretary for Administration, Stephanie Shell, is responsible for the oversight of the department's compliance with federal LEP requirements. The Director of the Bureau of Equal Opportunity (BEO), Crystal B. Welsh, is responsible for directing the agency's day-to-day compliance with federal and state civil rights statutes and regulations to include the DHS Language Access Plan. She is also the DHS Language Access Coordinator. Each program office, in conjunction with Crystal Welsh, will adhere to the written plan that includes protocols and procedures to guide their operations and ensure compliance with federal and state regulations.

It is the responsibility of each program office to ensure meaningful access to benefits and services for individuals with LEP. This includes contractors, subcontractors, grantees, and subgrantees, contracts, grants, or other agreements. Each office, as appropriate, shall establish and implement protocols based upon the DHS Language Access Plan for monitoring its services, benefits, contractors, and grantees for civil rights compliance in conjunction with the Bureau of Equal Opportunity.

The Language Access Plan addresses methods for ensuring compliance in the areas of assessment, language access, staff training, and monitoring as follows:

#### Assessment of Needs:

- Review the most recent Census data for languages spoken in served areas;
- Identify languages for which interpreter and translator services (both oral and written)
   will or may be needed;
- Determine individual language needs of those served;
- Record individual language needs of those served;

- Identification of language assistance contact persons in each office;
- Identification of available resources; and,
- Identification of protocols to ensure timely access to services.

#### Language Access:

Based on the above assessment, each program office must adhere to established procedures to provide for language access through:

- Notice of availability of language services to persons with LEP;
- Notification to applicants and recipients of the availability of free oral and written language translation services;
   Oral language interpretation;
- Translation of written materials;
- Protocol for use of the statewide contract for translation and interpretation; and,
- Protocol to ensure that all contractors/business partners are aware of their responsibility
  to provide meaningful access to services for individuals who have limited English
  proficiency and a strategy to monitor the same.

#### Staff Training:

Development of a written training plan to ensure the program office's LEP protocols and guidelines are conveyed to all staff in a comprehensive manner that enables them to provide effective and timely services to persons with LEP. This training is provided by DHS Bureau of Equal Opportunity.

#### Monitoring:

Each deputy secretary will identify LEP Coordinator(s) to act as a liaison between the program office and the Bureau of Equal Opportunity. The LEP Coordinator will be responsible for monitoring the internal operations of the program office to ensure compliance with DHS' Language Access Plan and LEP policy.

The Office of Administration, Bureau of Equal Opportunity is responsible for ensuring that all program offices are aware and utilize the DHS Language plan and operate in compliance with the LEP policy. The Language Access Coordinator will be responsible for providing training, technical assistance, and monitoring each of the eight program offices to ensure the development, implementation, and maintenance of the Language Access Plan and the LEP policy agency wide.

For questions regarding the Limited English Proficiency Policy or the Language Access Plan, please contact the DHS Language Access Coordinator.

#### **Language Access Coordinator Contact Information:**

Crystal B. Welsh, Director
Bureau of Equal Opportunity (BEO),
Room 225 Human Services Building
Harrisburg, PA 17120

Email: <u>crwelsh@pa.gov</u> Phone: (717) 214-2487

#### **Complaints:**

Complaints regarding meaningful access to services by persons with LEP may be filed with the following agencies:

Department of Human Services
Bureau of Equal Opportunity
Room 225, Health & Human Services Building
P.O. Box 2675
Harrisburg, Pennsylvania 17120
PW-BEOAO@pa.gov
Telephone: (717) 787-1127
Fax: (717) 772-4366

TDD-PA Relay Services 711 (Within 90 days of incident)

U.S. Department of Health & Human Services
OCR - Centralized Case Management Operations
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201
OCRComplaints@hhs.gov
Telephone: 1-877-696-6775
(Within 180 days of incident)

TO BE PERMANENTLY POSTED ON ALL BULLETIN BOARDS

## **Appendix E: DHS LEP Coordinators Chart**

The DHS LEP Coordinators' Chart is attached for quick reference. It accurate upon publishing date.

For the most up to date listing of DHS LEP Coordinators, see the link below.

**DHS LEP Coordinators Listing** 

#### **Department of Human Services Language Access Coordinator**

#### Language Access Coordinator - Crystal B. Welsh - Bureau of Equal Opportunity - 717-7871127 - crwelsh@pa.gov

#### **DHS Limited English Proficiency Coordinators**

		DHS Limi	ted English Proficiency Coordi	inators		
Program/CAO/District Office	LEP Coordinator	Phone Number	CWOPA email	Back-up Coordinator	Phone Number	CWOPA email
Adams	Jennifer DiMaria	717-338-2327	jdimaria@pa.gov	Vicki Miller	717-338-2329	vicmiller@pa.gov
Allegheny - Greater Pgh. East	Linda Kieda	412-626-3615	Ikieda@pa.gov	Nicole White	412-645-6463	nicwhite@pa.gov
Allegheny - HQ	Jayme Gray	412-565-2169	jaygray@pa.gov	Megan Turak	412-258-2416	mturak@pa.gov
Allegheny - IRED	Juliet Adedimila	412-664-6871	jadedimila@pa.gov			
Allegheny - Liberty	Dave Levine	412-770-2578	davlevine@pa.gov	Joe Greiber	412-209-0268	jgreiber@pa.gov
Allegheny - Southeast	Neil Reno	412-664-6894	nereno@pa.gov			
Allegheny - Southern	Dave Levine	412-770-2578	davlevine@pa.gov	Constancia Secich	412-209-0383	csecich@pa.gov
Allegheny - Three Rivers	Dave Levine	412-770-2578	davlevine@pa.gov	Christina Sacco	412-209-0301	csacco@pa.gov
Allegheny Alle-Kiski	Bryan Adkins	724-337-5610	badkins@pa.gov	Dennis O'Neil	724-3043266	doneil@pa.gov
Allegheny CSC	Kristen Jones	412-770-2986	kristjones@pa.gov	Janet Andrewson	412-770-2994	jandrewson@pa.gov
Armstrong	Kim Kovatch	724-548-0238	kkovatch@pa.gov			
Beaver	Barbara Raines	724-773-7330	braines@pa.gov	Jason Zona	724-773-7590	jzona@pa.gov
Bedford	Aimee Benitez	814-624-4004	abenitez@pa.gov	Wendy Clevenger	814-624-4008	wclevenger@pa.gov
Berks	Alicia Reid	610-736-4252	alreid@pa.gov	Michele Rivera	610-736-4271	michrivera@pa.gov
Blair	Dan Hnatkovich	814-946-7371	dhnatkovic@pa.gov	Tom Bucher	814-946-7142	tbucher@pa.gov
Blair CSC	Joel Miller	814-505-1531	joemiller@pa.gov	William Berryman	814-201-9968	wberryman@pa.gov
Blair PC	Martin David	814-201-9943	davmartin@pa.gov	Krista Murphy	814-201-9940	krmurphy@pa.gov
Bradford CAO	Walter Putnam	570-268-1899	wputnam@pa.gov	Tammie West	570-268-1900	twest@pa.gov
Bucks	Cheryl Cole	215-781-3337	chcole@pa.gov	Cynthia Frazier	215-781-3420	cyfrazier@pa.gov
Butler	Nathan Statzer	724-284-8829	nstatzer@pa.gov			
Butler PC	Lori Boozel	724-234-4016	lboozel@pa.gov	Michael Wilson	724-234-4002	michwilson@pa.gov
Cambria	Michael Hauger	814-533-2309	mhauger@pa.gov	Patty Koontz	814-533-2389	pkoontz@pa.gov
Cambria PC	Christopher Hunter	814-533-2606	chrihunter@pa.gov	Mary Williams	814-533-2303	marywilli@pa.gov
Cameron	Jennifer Holt	(814) 205-1131	jeholt@pa.gov	Michelle Valenti	814-274-4106	mvalenti@pa.gov
Carbon	Michele Faust	610-577-9036	mifaust@pa.gov	Anthony Romano	610-577-9026	aromano@pa.gov
Central Unit	Barbara Burton	717-265-8994	bburton@pa.gov	Scott Umstead	717-772-2592	sumstead@pa.gov
Centre	Margo Watson	814-861-1952	mwatson@pa.gov	Rachael Futrell	814-861-1951	racfutrell@pa.gov
Chester	Viannette Torres-Rivera	610-466-1029	vtorresriv@pa.gov	Erica Dixon	610-466-1024	erdixon@pa.gov
Clarion	Stephanie Hauserman	814-226-1739	shauserman@pa.gov			
Clearfield	Jennifer Holt	814-205-1131	jeholt@pa.gov	Leslie London	(814) 205-1034	llondon@pa.gov
Clearfield PC	Anne Marie Kephart	814-205-1045	akephart@pa.gov	Emily Gette-Doyle	814-205-1141	egettedoyl@pa.gov
Clinton	Stacey Shay	570-893-4552	stshay@pa.gov	,		
Columbia	Tammy Feudale	570-912-1145	tfeudale@pa.gov	Wendy Townsend	570-912-1132	wtownsend@pa.gov
Columbia PC	Teresa Wagner	570-912-1130	tewagner@pa.gov	Rachel Kusnerick	570-912-1160	rkusnerick@pa.gov
Crawford	Sharon Sherman	814-955-3192	shsherman@pa.gov	Fredric Oakman	814-955-3191	froakman@pa.gov
Cumberland	Timothy Myers	717-240-2731	timyers@pa.gov	Carol Dunkle	717-240-2747	cdunkle@pa.gov
		•				

		DHS Limi	ted English Proficiency Coord	linators		
Program/CAO/District Office	LEP Coordinator	Phone Number	CWOPA email	Back-up Coordinator	Phone Number	CWOPA email
Dauphin	Lisa Booth	814-955-3149	lbooth@pa.gov	Elizabeth Pliszka	717-787-1001	epliszka@pa.gov
Delaware (Crosby)	Crystal Kendrick	(610) 447-5335	crkendrick@pa.gov	Pamela Tompkins	610-461-3896	ptompkins@pa.gov
Delaware (Darby)	Pamela Tompkins	610-461-3896	ptomkins@pa.gov	Crystal Kendrick	610-447-5335	crkendrick@pa.gov
Elk	Jennifer Johnson	(814) 955-3056	Jeljohnso@pa.gov			
Erie	Karen Pettigrew	(814) 461-2083	kpettigrew@pa.gov	Carlos Pagan	814-461-2089	cpagan@pa.gov
Fayette	Scott Patterson	724-439-7047	scopatters@pa.gov	Hope Haywood	724-415-3263	hhaywood@pa.gov
Fayette CSC	Cindy Hall	724-415-3324	cynthall@pa.gov	Michael Rohlf	724-412-3325	mrohlf@pa.gov
Fayette PC	Len Metts	724-415-3264	Imetts@pa.gov	Noelle Sampson	724-415-3232	nsampson@pa.gov
Forest	Nora Galina	814-955-3073	ngalina@pa.gov			
Franklin	Adam Bennett	717-262-6515	adbennett@pa.gov	Tom Walsh	717-262-6570	thowalsh@pa.gov
ulton	Danelle Flood	717-325-1212	dflood@pa.gov	Wendy Clevenger	814-624-4008	wclevenger@pa.gov
Greene	Desiree Colgan	724-288-9733	dcolgan@pa.gov	Katie Meza	(724) 288-9726	kmeza@pa.gov
Glendale	Kelli Randle	215-560-4624	KRANDLE@pa.gov			
Huntingdon	Sarah Shaffer	814-641-6442	sarahshaff@pa.gov	Brad Moore	814-641-6424	bdmoore@pa.gov
ndiana	Tammy Housholder	724-357-1274	thousholde@pa.gov	Drew Curley	724-357-4659	dcurley@.pa.gov
efferson	Nanette Lyons	(814) 955-3077	nalyons@pa.gov	Stacey Volchko	814-955-3096	svolchko@pa.gov
uniata	Nichole Keiter	717-996-8481	nkeiter@pa.gov	Lance Musser	717-996-8476	lmusser@pa.gov
Lackawanna	Frank Muraca	570 963-4453	fmuraca@pa.gov	Jennifer Hanson	570-963-3180	jhanson@pa.gov
ancaster	Earlene Bustos	717-299-7423	ebustos@pa.gov	Tina Sweigart	717-299-7426	tsweigart@pa.gov
Lancaster CSC	Joey Perez	717-874-3061	josperez@pa.gov	Carmen Cruz-Wendel	717-874-3143	ccruzwende@pa.gov
awrence	Timothy Quigley	724-656-3044	timquigley@pa.gov			
ebanon	Deanna Rhoade	717-270-3603	drhoade@pa.gov	Marisol Rodriguez Nieves	717-270-3611	marisorodr@pa.gov
ehigh	Karen Luipersbeck	610-821-6403	kluipersbe@pa.gov	Rhonda Miller	610-821-6135	rhomiller@pa.gov
uzerne -Hazleton	Sandra Lara	570-459-3821	slara@pa.gov	Christina Donnini	570-459-3819	cdonnini@pa.gov
Luzerne W-B	Leslie DelGaudio	570-826-2169	Idelgaudio@pa.gov	Christina Donnini	570-459-3819	cdonnini@pa.gov
Lycoming	Kenneth Chappell	570 327-3314	kchappell@pa.gov	Edward Nemeth	570-327-3304	enemeth@pa.gov
Lycoming PC	Joanne Vognet	570-505-7869	jvognet@pa.gov	Scarlett Davis	570-505-7868	scadavis@pa.gov

Program/CAO/District Office	LEP Coordinator	Phone Number	ted English Proficiency Coord CWOPA email	Back-up Coordinator	Phone Number	CWOPA email
McKean	James Keltz	814-362-5378	jkeltz@pa.gov	васк-ир соотипатог	Phone Number	CWOPA email
		•				
Mercer PC	Jamey Wise	724-983-5013	jamwise@pa.gov	Karda Brades	724 224 4022	lashania Oras saa
Mercer PC	Ronal Hambrick	724-983-5238	rhambrick@pa.gov	Kevin Burke	724-234-4023	keburke@pa.gov
/lifflin	Joelle Gilbert	717-242-6087	joegilbert@pa.gov	Jamie Morrison	717-242-6075	jamimorris@pa.gov
Monroe	Mozella McClendon	570-424-3519	mmclendon@pa.gov	Christina Alcamo	570-424-3971	calcamo@pa.gov
Montgomery (Norristown)	Liza Wickert	(610) 270-3505	lwickert@pa.gov	Brenda Dean	610-270-3509	Brdean@pa.gov
Montgomery (Pottstown)	Liza Wickert	(610) 270-3505	lwickert@pa.gov	Brenda Dean	610-270-3509	Brdean@pa.gov
Montgomery (Pottstown) CSC	Kristin Davidson	610-327-5652	krdavidson@pa.gov	Joell McDuffy	610-906-1646	jmcduffy@pa.gov
Montour	Tacy Biggar	570-275-7029	tbiggar@pa.gov	Jamie Myers	570-275-7004	jamimyers@pa.gov
Montour/Danville PC	Ashley Honabach	570-270-3661	ahonabach@pa.gov	Roxanne Yurkiewicz	570-271-3675	ryurkiewic@pa.gov
Northampton	Jose Santiago	610-250-1750	jsantiago@pa.gov	Nereida DeJesus	610-250-1833	nedejesus@pa.gov
lorthumberland	Michele Johnson	570-988-5930	michejohns@pa.gov	Christine Dunn	570-988-5924	chdunn@pa.gov
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