

City of Largo Limited English Proficiency Guidance

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LIMITED ENGLISH PROFICIENCY (LEP) PERSONS AND LANGUAGE ASSISTANCE PLAN

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

EXECUTIVE ORDER 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the City of Largo, private and non-profit entities and subrecipients.

LEP INTRODUCTION AND LANGUAGE ASSISTANCE PLAN

The City of Largo has developed this LEP Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of Largo programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future plan updates.

In developing the plan while determining the City of Largo's extent of obligation to provide LEP services, the City of Largo undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the City to be served or likely to encounter a City of Largo program, activity or service;
- 2) the frequency with which LEP individuals come in contact with a City of Largo program;

3) the nature and importance of the program, activity or service provided by the City of Largo to the LEP population; and

4) the resources available to the City of Largo and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

FOUR FACTOR ANALYSIS AND RESULTS:

1. The number or proportion of LEP persons eligible to be served or likely to encounter a City of Largo program, activity or service.

The City of Largo examined the U.S. Census Bureau’s 2012-2016 American Community Survey data and was able to determine that approximately 14.9%, or 11,490, of the city’s population age 5 and older spoke a language other than English at home and 6.6%, or 5,134, reported that they speak English “less than very well”. The most spoken language besides English in the City is Spanish, with 8.7% of the population speaking Spanish at home.

Table 1 below shows languages spoken at home in the City of Largo.

2012-2016 LANGUAGES SPOKEN AT HOME		
City of Largo Population 5 years and over	77,260	
Speak only English	65,770	85.1%
Speak a language other than English	11,490	14.9%
Speak English less than “very well”*	5,134	6.6%
Spanish		
Persons 5 years and over who speak Spanish at home	6,731	8.7%
Speak English less than “very well”*	3,605	4.7%
Indo-European		
Persons 5 years and over who speak Indo-European languages at home	3,453	4.5%
Speak English less than “very well”*	1,181	1.5%
Asian and Pacific Islander languages		
Persons 5 years and over who speak Asian and Pacific Islander languages at home	896	1.2%
Speak English less than “very well”*	270	0.3%
Other Languages		
Persons 5 years and over who speak other languages at home	410	0.5%
Speak English less than “very well”*	78	0.1%

Source: U.S. Census Bureau 2012-2016 American Community Survey

* Of total population

LEP persons may interact with the City of Largo at public meetings or events the City of Largo is participating in. Community meetings held by the City of Largo, including City Commission meetings, offer the opportunity for translation, as described in this Plan. The City of Largo, through its public participation efforts, attends community meetings and participates in events throughout the City. The City of Largo has certain materials translated into Spanish, as described in this Plan, and evaluates new materials as they are produced, to determine format and language for production and distribution.

The U.S. Department of Transportation has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. For groups that constitute five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, than this action will be considered to be strong evidence of compliance of the City of Largo’s written translation obligations. If there are fewer than 50 persons in a language group that reaches the five percent trigger, then this provision does not require translation of vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Based on census data, Spanish language translation falls under the “safe harbor” provision. As such, vital written materials are to be translated into Spanish. The City of Largo is prepared to translate vital documents into other languages should the demographics of other groups fall under the “safe harbor” provision, and to provide verbal translation or translation through another means, to those who request it as well. When engaging with LEP populations, the City of Largo assesses the best method for engagement. This may include written or verbal translation, depending on the situation, potential literacy skills, and the identified language barrier.

2. The frequency with which LEP individuals come in contact with a City of Largo program, activity or service.

From experience, the City of Largo has assessed the locations or circumstances at which staff has or could possibly have contact with LEP persons. Key areas in which LEP individuals interact with the City of Largo are:

- Police Department: emergency calls (911 system) and law enforcement encounters
- Fire/Rescue Department: National Fire Protection Agency (NFPA) educational materials and first response encounters
- Community Development Department: permitting, planning and code enforcement services
- City Clerk: election related notices and public meetings
- Recreation, Parks and Arts Department: routine encounters at recreation facilities and special events
- Communications and Marketing: routine encounters at neighborhood meetings and community events
- Human Resources Department: employment opportunities
- Environmental Services Department: public education and outreach
- Engineering Services Department: project specific outreach and stormwater public education

3. The nature and importance of the program, activity or service provided by the City of Largo to the LEP community.

The City of Largo has prioritized the importance of the program, activity or service to the LEP community as follows:

- Emergency response (police and fire) and disaster recovery services
- Services required by Federal regulations and policies
- Community business and residential support and development
- Community outreach and education

4. The resources available to the City of Largo and overall costs.

The City of Largo assessed its available resources that are used for providing LEP assistance. This assessment included identifying what staff and volunteer language interpreters are readily available, and which documents should be translated.

City of Largo staff translation is readily available. Spanish language translation is available widely across the most of the Departments. Additionally, City staff can translate Vietnamese, Polish, French and Albanian languages. First responders can also access a broad set of language translation services provided by the commercial vendor Voiance, which is accessed through the 911 dispatch system.

The City also provides Spanish language written material for election notifications and employment opportunities. LEP persons with internet access can view the City of Largo website in dozens of different languages at the click of a button. Additionally, Fire Rescue can provide National Fire Protection Agency (NFPA) educational materials in nine (9) different languages and the Environmental Services Department publishes a Fats, Oils and Greases Reduction brochure in Spanish. Finally, English/Spanish “Only Rain Down the Drain” placards are being installed near stormwater inlets across the City.

Other community outreach efforts include a Spanish language Special Event cards and a brochure and youtube video (<https://youtu.be/CRgz5lCPwQ8>) explaining access to City services.

The costs for these services are included within the respective department’s annual operating budget.

After analyzing the four factors, the City of Largo developed the plan outlined in the following section for assisting persons of Limited English Proficiency.

LANGUAGE ASSISTANCE PLAN: ASSISTANCE SERVICES, MONITORING AND EVALUATION

1. How to Identify an LEP Person who Needs Language Assistance

Below are procedures for identifying persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When City of Largo sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the City of Largo office reception area; and post a notice of available language assistance at City of Largo reception area.

2. Language Assistance Measures

When an interpreter is needed, in person or on the telephone, the City of Largo shall first determine what language is required. Staff can provide Spanish, French, Vietnamese, Polish, French and Albanian informal verbal interpretation. Spanish V/TDD service is available through the Pinellas County Office of Human Rights. The phone number is 727-464-4062 (V/TDD). Staff may be able to assist with written communications and small City of Largo document translation requests from LEP persons.

3. City of Largo Staff Training

City of Largo staff that are likely to encounter LEP persons will be provided with the LEP and LAP Plan and educated on procedures and services available.

Training topics are listed below:

- Understanding the Title VI LEP and LAP responsibilities;
- What language assistance services the City of Largo offers;
- Use of LEP "I Speak Cards";
- How to access a staff interpreter;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on the City of Largo's LEP program responsibilities and their obligation to provide language assistance.

4. Providing Notice of Available Language Service to LEP Persons

Language assistance services are available to the public upon request beyond those services already available as listed in the LEP Plan. Persons wishing to request special language services should contact the City's LAP Title VI/Nondiscrimination Coordinator at:

City Engineer/LAP Nondiscrimination Coordinator

Attn: Jerald Woloszynski, P.E.

Mailing Address: Engineering Services Department,

201 Highland Avenue P.O. Box 296, Largo, Florida 33779

Physical Address: 201 Highland Avenue, Largo, Florida 33770

Phone: (727) 587-6713
Fax: (727) 586-7413
Hearing Impaired: Florida Relay 7-1-1

5. Outreach Techniques

The following are potential outreach techniques to assist with reaching and providing language assistance for LEP populations.

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements and agendas will be printed in an alternative language, such as Spanish.
- When placing a general public meeting notice, staff should insert “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”. Or if not sure of the need, staff should insert, “Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la(insert staff name) al teléfono(727) 464-8200, cuando menos 48 horas antes de la junta”which asks persons who need Spanish language assistance to make arrangements with the City of Largo within two days of the publication notice.
- Spanish speaking staff or a hired interpreter should be on hand at public meetings intended for gathering public input.

6. Monitoring and Updating the LEP Plan

At a minimum, the City of Largo will follow the Title VI Program update schedule for the LEP Plan. A Title VI Program update must be forwarded to FHWA and FDOT every three years. The questions listed below will be considered in updating the LEP Plan.

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the City of Largo?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified City of Largo programs and are there other programs that should be included?
- Have the City of Largo’s available resources, such as technology, staff and financial costs changed?
- Has the City of Largo fulfilled the goals of the LEP Plan?
- Were any complaints received?

7. Dissemination of the City of Largo Limited English Proficiency Plan

The City posts the LEP Plan on its website at www.largo.com/services/financial_center/index.php. Any person, including social service, non-profit and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, all Pinellas County libraries and the Largo library offer free internet access. Each City of Largo

subrecipient will be provided a copy and informed of the importance of providing language assistance. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding LEP should be directed to City of Largo staff at 727-587-6713.