

Title VI
Limited English
Proficiency Policy and
Plan

2020-2022

Lake Alfred, Florida

155 E. Pomelo Street Lake

Alfred, Florida 33850

863.291.5270

Florida Relay 711

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Section I

I. Purpose

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) et seq.; Executive Order 13166; and the U.S. Department of Labor Revised Guidance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons are guidelines that apply to all departments and offices reporting to the City of Lake Alfred their contractors and subcontractors, and other agents who receive federal or state financial assistance for their programs and services.

II. Policy

All departments and offices reporting to the City of Lake Alfred will comply with these guidelines to take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have timely, meaningful access and an equal opportunity to participate in services and benefits provided by the City. Through its Language Access Plan, the City will accomplish these goals:

- Every other year assess target audiences for LEP services;
- Ensure meaningful verbal communication with LEP persons and their authorized representatives;
- Communicate information contained in vital documents;
- Provide ADA compliant interpretation services at no cost to the person being served;
- Inform LEP persons of these services and their right to access them free of charge;
- Accommodate public input from the LEP community;
- Manage this plan routinely to ensure continuing compliance.

Definition: A Limited English Proficiency (LEP) person does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

III. Plan Development

This plan was developed through analysis of four factors:

1. The number or proportion of eligible LEP persons in the Lake Alfred service area;
2. The frequency with which LEP individuals come in contact with City service providers;

3. The nature and importance of the program, activity, or service provided to the LEP population; and
4. Available resources and overall costs to provide LEP assistance.

IV. Plan Procedure

A. Assess the Proportion of LEP Persons Eligible to be Served

Using U.S. Census/American Community Survey data and other resources, the City of Lake Alfred will every other year assess the languages spoken by LEP persons within the City and the number of LEP persons who are eligible for the services.

B. Record the Frequency of LEP Service Requests

The City of Lake Alfred acknowledges its responsibility to record the frequency by which LEP individuals come in contact with City programs, services, or activities. Operations departments and offices will record external service requests from contacts with LEP persons in order to determine the frequency of contact with customers who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The more frequent the contact and/or the number of associated requests for alternate format(s) for languages other than English, as self-identified by applicants and participants in its programs, the more likely language services for a specific language group will be needed. Measures necessary for a program that serves a person with LEP one time or occasionally will necessarily be different from those that serve persons with LEP every day. While less frequent contact suggests a different, less intense solution, some services may still be necessary for times when an LEP person occasionally seeks services.

C. Provide Notice

The City of Lake Alfred will inform LEP persons they will provide them with language assistance at no charge. Written notice will be provided on the City's website, by posting notices at appropriate points of service and points of entry; and by including references to LEP rights and services in public notices.

LEP persons are encouraged through these public notices to request translator services.

D. Provide Language Assistance

The City of Lake Alfred will take reasonable steps to assure that LEP persons receive the language assistance necessary for meaningful access to our programs and services, both verbal and in the communication of written information contained in written documents to accomplish these goals:

- A. Identify the initial point of contact and subsequent points of contact with LEP persons where language assistance is likely to be needed.
- B. Provide a method or methods at the initial point of contact to notify LEP persons that:
 - a. Upon request, they are offered language assistance;

- b. They will not be personally charged for the cost of language assistance provided by City staff;
 - c. They will not be personally charged for the cost of translating vital documents.
- C. Based on its assessments and these guidelines, the City of Lake Alfred shall make arrangements to access appropriate interpreters and translation services, if not available through city staff.
- D. The language needs, the resources to provide effective language, and the arrangements to access these resources in a timely fashion shall be promptly determined and prominently displayed for future reference. These arrangements may include the use of:
 - a. A list of bilingual staff,
 - b. Online resources, such as google translate, <http://translate.google.com>,
 - c. Translators may be personally selected by LEP persons, but only under these conditions:
 - i. This option is specifically requested by the LEP person;
 - ii. The City of Lake Alfred shall provide a bilingual staff member to assist with translation if available.
 - iii. The LEP person understands that the City of Lake Alfred is not responsible for any fees or charges owed to an outside interpreter or translator, and the LEP person must pay those fees or charges at their own expense;
 - iv. The City of Lake Alfred does not object to the use of the personally selected translator due to concerns about the competency of interpretation, confidentiality, privacy, and/or conflict of interest.
 - v. The LEP person's election of this choice would be documented.
- E. When a written translation of vital documents is needed, each program area will submit documents to the appointed departmental staff person who will retain the translated versions of important documents.

V. Monitoring

The City of Lake Alfred will monitor and periodically evaluate the LEP Policy and Plan for the City's compliance. At a minimum, the overall monitoring program will determine whether:

- A. Contractors hired to provide City services or Lake Alfred grant sub-recipients comply with Title VI;
- B. Existing language assistance is meeting LEP persons' needs;
- C. Staff is trained in current LEP policies; and
- D. Resources and arrangements for assisting LEP persons are still current and viable.

VI. Appendix

Lake Alfred Biennial Proportion Assessment and Citywide Monitoring Report 2020 Biennial Assessment

According to Lake Alfred's Limited English Proficiency Policy and Plan, the city will every other year assess the proportion of persons with limited English proficiency residing in Lake Alfred. The 2020 assessment verifies that Lake Alfred has a nominal number of Spanish speakers with limited English proficiency and that the city would be prepared to provide services in Spanish.

The proportion of the Population

The data for the City of Lake Alfred, Florida has been compiled according to the 2019 United States Census American Community Survey.

Population: 5,788

Total Housing Units: 2,538

The language that is spoken at home:

- 9.4% percent of individuals residing in Lake Alfred speak Spanish;
- 4.7% speak other Indo-European Languages;
- 4.0% speaking Asian and Pacific Islander Languages;
- 81.9% percent of the total population in Lake Alfred speaks English only at home.

Frequency of Contact with LEP Customers

The City of Lake Alfred departments shall determine the frequency by which staff comes into contact with customers needing external services who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The more frequent the contact and/or the number of associated requests for languages other than English, as self-identified by applicants and participants in its programs, the more likely language services for a specific language group will be needed. Departments will determine the necessity for translating documents into alternate languages.

Evaluation of Contractors

Subcontractors are monitored for Title VI compliance.

Evaluation of Staff Trained in Current LEP Policies

In all city departments, bi-lingual staff has routinely handled translation requests.

Assessment of Resources and Arrangements

No City of Lake Alfred departments have reported an inability to provide timely language assistance when needed and there were no unmet demands for language assistance. No grievances from the public have been made.

Conclusion

The City of Lake Alfred complies with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) et seq.; Executive Order 13166; and the U.S. Department of Labor Revised Guidance Regarding the Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons. No additional resources are needed.