

CITY OF ST PETERSBURG
LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Purpose: The purpose of the City of St. Petersburg (City) Limited English Proficiency (LEP) Plan is to ensure meaningful access to information, programs, services, and activities for LEP persons. LEP is a term used to describe persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

Authority: Pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166, as a recipient of federal funds the City is required to provide important information and services to LEP persons; maintain an LEP plan that is continuously monitored; and certify LEP plan compliance with applicable federal agencies.

Needs Assessment: The United States Department of Justice (DOJ) has issued formal guidance that requires the City to take “reasonable steps” to ensure LEP persons have meaningful access to important information and services. The following four (4) factors must be assessed to determine the reasonable steps required:

- 1) The number or proportion of LEP persons in the City service area;
- 2) The frequency with which LEP persons come in contact with City programs, services, or activities;
- 3) The nature and importance of the City program, service, or activity to the LEP population; and
- 4) The resources available and costs associated with providing LEP assistance.

DOJ guidance states that recipients of federal funds have substantial flexibility to determine the appropriate level of LEP assistance provided based upon a local assessment of the above factors.

- 1) The number or proportion of LEP persons in the City service area:

Population census data is useful to determine the number or proportion of LEP persons in the City service area. According to U.S. Census data from 2015, Spanish is the most predominant LEP language in Pinellas County, which has over 50,000 Spanish-speaking LEP persons, comprising six point four percent (6.4%) of the total county population.

The 2015 census data also show the other most common languages of LEP persons in Pinellas County are "Other Indo-European," comprising five percent (5%) of the total county population, and "Asian and Pacific Island," comprising two point four percent (2.4%) of the total county population.

The predominant “Other Indo-European” languages of LEP persons in Pinellas County are Greek with 5,694, French with 5,355, German with 4,800, and Serbo-Croatian with 4,622 persons respectively.

The predominant “Asian and Pacific Island” languages of LEP persons in Pinellas County are Vietnamese with 5,661 and Tagalog with 3,152 persons, respectively.

Accordingly, pursuant to DOJ guidance and the most current census population data, the City will provide language translation and interpretation assistance for the Spanish LEP population, and written translation of vital documents into each language that constitutes five percent (5%) of the population likely to access City programs.

The City ADA and Diversity Coordinator (ADA Coordinator) shall annually assess the most common languages spoken by populations likely to access City programs through review of data provided by the U.S. Census Bureau, the Pinellas County School District, the American Community Survey, and the City to determine the number or proportion of LEP persons in the City service area and to amend this plan as required.

2) Frequency of Contact:

The City is required to assess, on an ongoing basis, the frequency with which all LEP persons come in contact with City programs, services, or activities (programs) to determine whether assistance in additional languages may be required for specific populations.

This ongoing assessment will require City staff to report all contacts and language requests by LEP persons to the ADA Coordinator. At a minimum these reports shall document the information sought and the language spoken and/or requested by LEP persons.

The ADA Coordinator shall meet regularly with the Human Resources Director and City Attorney, or their designees, to evaluate frequency of contact with LEP populations and amend this plan as required.

3) Nature and Importance of Programs and Services:

The City is also required to assess, on an ongoing basis, the nature and importance of its programs, and possible outcomes of ineffective communication of related information to LEP persons. This assessment shall also consider whether a delay or denial of access to a given program could have serious health and/or safety consequences, and therefore be classified as a “vital” program. Such programs, along with related information, shall then be prioritized to ensure access for LEP persons, with due consideration given to ongoing needs assessments and available resources.

Each City department (department) has an employee designated as its ADA Liaison. Upon implementation of this plan, ADA liaisons shall forward a list of programs the departments deem vital to the ADA Coordinator. All newly-developed programs that the departments deem vital shall be reported prior to implementation and as soon as reasonably possible.

The ADA Coordinator shall confer with the Human Resources Director and City Attorney, or their designees, to determine the list of vital programs and related information that require translation. Upon final approval, the list of vital programs shall be published as an appendix to this plan.

4) Resources and Costs:

The City will develop the most cost-effective means to deliver proficient LEP language assistance based on the ongoing needs assessment. All costs of language assistance services shall be borne by the department that provides the specific program.

Departments shall submit annual fiscal year reports regarding costs associated with LEP plan compliance, and the ADA Coordinator shall publish an annual fiscal year report of those costs as an appendix to this plan.

The ADA Coordinator shall also identify any City resources that departments could share, and any efficiencies that could be derived thru collaborative relationships with outside organizations.

The City will also develop a list of approved language assistance services that provide proficient interpretation services at no cost for LEP persons. These services shall use widely-accepted interpretation technologies wherever possible and may include:

- Computer programs and web-based applications accessed thru hand-held tablets and smart phones;
- Telephonic interpretation services, such as the "Language Line," and similar services;
- Interpretation assistance provided by certified interpreters;
- Interpretation assistance provided by City staff who speak the requested language;
- Interpretation assistance provided by those who accompany LEP persons; and
- The use of "I speak" flash-cards.

The Human Resources Department Labor Relations and Training Division (Labor Relations and Training) will utilize a City database to identify and document employee interpretation proficiencies and share that information with department managers.

Departments will use an automated tool to report all language assistance provided to the ADA Coordinator, who shall publish an annual fiscal year report of total language services provided as an appendix to this plan.

LEP Plan Complaint Process: The City will use its existing Title II complaint process, which will be revised to include a LEP complaint process. The revised complaint information and forms shall be translated into Spanish and distributed to all departments.

Public Notice of the LEP Plan and Language Services: Formal public notice of the LEP Plan, the language services available, and the complaint process shall be posted on the City website in both English and Spanish. That information shall also be provided to community organizations for distribution to populations that would most benefit from language assistance.

Staff Training: Labor Relations and Training will provide general training regarding LEP Plan responsibilities for all City employees and more extensive training for the designated ADA liaisons, who will provide further LEP Plan information and guidance for their respective staffs.

Certifications: The City ADA Coordinator shall certify LEP plan compliance with applicable federal agencies and review and amend the LEP Plan and/or translation services offered as required.

Additional Information: Information regarding LEP plan requirements may be found on the DOJ web site at www.doj.gov. Requests for additional information regarding the City's LEP plan and any comments or concerns may be addressed to:

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