

2018 Limited English Proficiency Plan for the City of West Palm Beach

Who is a LEP Individual?

Individuals who have Limited English Proficiency (LEP) are those who do not speak English as their primary language AND who have a limited ability to read, speak, write or understand English.

Background

Limited English Proficiency is a term used to describe individuals who are not proficient in the English language.

Federal law: Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency, and (Presidential) Executive Order 13166 - requires Federal departments and agencies to develop and make available guidance on how recipients of Federal funds should assess and address the needs of LEP individuals seeking assistance.

The US Department of Transportation (DOT) developed guidance titled A Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons. This guidance was issued to ensure that persons in the United States are not excluded from participation in DOT-assisted programs and activities simply because they face challenges communicating in English.

The intent of this plan is to ensure that where substantial numbers of residents of West Palm Beach exist, who do not speak or read English proficiently, these LEP individuals have access to the planning process and published information, and that public notification is provided in other languages. The production of multilingual publications and documents and/or interpretation at meetings/events will be provided to the degree that funding permits based on current laws and regulations.

Determining the Need

As a recipient of federal funding, The City of West Palm Beach must take reasonable and responsible steps to ensure meaningful access to the information and services it provides.

Four Factor Analyses

To ensure meaningful access the City adopts the four factor analysis referenced in the DOT Guidance:

1. The number and proportion of LEP persons in the eligible service area;
2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

The US DOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in the West Palm Beach service area in relation to the transportation planning process.

1. The Number and Proportion of LEP Persons In The Eligible Service Area

For West Palm Beach the first step towards understanding the profile of individuals that compose our service area in Palm Beach County is a review of Census data.

The table below displays the primary language and number of individuals 18 and over that speak English "not well" or "not very well" at home. Only the top four language groups for Palm Beach County are displayed.

At this time, Spanish represents a significant percentage of the region's population.

Palm Beach County, Florida				
LANGUAGE SPOKEN AT HOME	Total		Percent	
	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	1,307,499	+/-95	(X)	(X)
English only	919,626	+/-5,215	70.3%	+/-0.4
Language other than English	387,873	+/-5,238	29.7%	+/-0.4
Speak a Language Other than English				
Spanish	229,085	+/-2,552	17.5%	+/-0.2
5 to 17 years old	42,639	+/-1,296	3.3%	+/-0.1
18 to 64 years old	162,090	+/-11,709	12.4%	+/-0.1
65 years old and over	24,356	+/-569	1.9%	+/-0.1
Other Indo-European languages	127,818	+/-3,714	9.8%	+/-0.3
5 to 17 years old	20,253	+/-1,160	1.5%	+/-0.1
18 to 64 years old	84,221	+/-3,010	6.4%	+/-0.2
65 years old and over	23,344	+/-1,148	1.8%	+/-0.1
Asian and Pacific Islander languages	20,055	+/-1,351	1.5%	+/-0.1
5 to 17 years old	2,426	+/-362	0.2%	/-0.1
18 to 64 years old	15,345	+/-1,131	1.2%	/-0.1
65 years old and over	2,284	+/-245	0.2%	/-0.1
Other languages	10,915	+/-1,171	0.8%	/-0.1
5 to 17 years old	1,923	+/-442	0.1%	/-0.1

18 to 64 years old	6,281	+/-766	0.5%	/-0.1
65 years old and over	2,711	+/-417	0.2%	/-0.1
Citizens 18 Years and Over				
All citizens 18 years old and over	956,277	+/-3,325	(X)	(X)
Speak only English	763,662	+/-4,310	79.9%	+/-0.4
Speak a language other than English	192,615	+/-3,974	20.1%	+/-0.4
Spanish	111,169	+/-2,667	11.6%	+/-0.3
Other languages	81,446	+/-2,801	8.5%	+/-0.3

*Data obtained from the United States Census Bureau Fact Table for Palm Beach County as of 7/17/17 and the American Community Survey 5-Year Estimates 2011-2015, a copy of which is attached.

2. The Frequency with Which LEP Persons Come In Contact With the Program

The growing size of the LEP population in Palm Beach County increases the probability of its contact with the City of West Palm Beach services. The City plans to assess the frequency at which staff has or could possibly have contact with LEP persons. As of this date the City has not had requests for interpreters for any public meetings.

The City of West Palm Beach's prior experience with limited English proficient persons has been primarily with Spanish speakers. A discussion with the City's call center indicates a very small number of calls requiring being transferred to a Spanish speaking Customer Service Representative.

3. The Importance of the Service Provided By the Program

The City plans to survey program, services and activities participants to determine key service indicators of our customers.

4. The Resources Available To the Recipient

The City already uses its staff as the primary resource for LEP assistance. Basic materials available to the public are provided in Spanish, translations are completed by City staff. The call center already provides an option for Spanish speaking persons... Visitors to City Hall can request a Spanish speaking person to assist them with their issues and questions.

The additional cost is on the printing of materials now in English and Spanish.

Meeting the Requirements: City of West Palm Beach Limited English Proficiency Plan

Based on the current levels of residents with Limited English Proficiency in Palm Beach County and projected interaction with City Service as a provider of Public Transportation in the City, the City is committed to providing meaningful access to its services to LEP persons.

All language access activities detailed below will be coordinated by the City.

Providing Notice to LEP Persons

Based on the City self-assessment of LEP persons that come in contact with its services and

programs, languages other than English should be used in all notices and publications that refer to public transportation services. This information should be provided in a notice in a language LEP persons will understand. At a minimum, the Agency commits to:

- Maintain a list of employees who competently speak the LEP language(s) and who are willing to provide translation or interpretation services.
- Distribute this list to staff that regularly has contact with the public.
- Provide public notification in the LEP language of the availability of language assistance, free of charge.

In addition, the Agency will provide additional notification. Some notification ideas include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (Public Hearing Notices) that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Using a telephone voice mail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English.

Language Assistance Measures

Language assistance will be provided for some LEP individuals through the translation of some key materials, as well as through oral language interpretation when necessary and possible.

Translation of written materials

The City currently offers publications with translations in Spanish, the continue self-assessment of LEP population will determine if additional languages will need to be added.

Staff training

In order to establish meaningful access to information and services for LEP individuals, employees in public contact positions and those who will serve as translators or interpreters will be properly trained by the City. Such training will be developed to ensure that staff is fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals. The City management staff is to be included in this training, even if they do not interact regularly with LEP persons, to ensure that they are fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff.

The Agency understands that its community characteristics change and that the four factor analysis may reveal the need for more or varied LEP services in the future. The City will continue this assessment alongside the demographic analysis for Title VI, and this information will be revised if needed every three years.

This LEP Plan is submitted to update the City of West Palm Beach Title VI Program. Additional information will be provided upon request.

Respectfully,

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