



LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Language Access Plan (LAP) for the City of Tampa

Introduction and Purpose

In compliance with Title VI of the Civil rights of 1964 and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”, the City of Tampa has established the following Language Access Plan (LAP) to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our offices. An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.” (Executive Order 13166)

Under Title VI, the U.S. Department of Housing and Urban Development (HUD) states that recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by limited English proficient LEP persons.

The City of Tampa is fully committed to providing equitable access to the City’s programs and services. The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion for all persons. To prepare for the development of this plan, a Four-Factor Analysis was conducted that considers the following elements:

1. The number or proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which the LEP persons come into contact with the agency;
3. The nature and importance of the program, activity, or service provided by the agency;
4. The resources available and costs to the recipient.

Persons Charged with Implementing the Plan

The Tampa Office of Human Rights (TOHR) will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, the TOHR will maintain and update this plan as needed. The TOHR will coordinate with the Tampa Human Rights Board, the Housing and Community Development Division (HCD), and City of Tampa (COT) offices in order to carry out the directives established by this plan.

Identification and Assessment of LEP Communities

In order to identify LEP individuals in the city, data was used from the 2018 American Community Survey available at the U.S. Census Bureau website. This data identifies households in the City of Tampa with limited English-speaking, and persons in the City of Tampa that live below the poverty level and speak languages other than English. These two data sets provide the best assessment of persons that may be accessing Federally-funded programs and grant-based services, and may be in need of language assistance services. Based on this data, the following populations have been identified:

City of Tampa	Number	Percentage
All Households	154,047	100%
Households Speaking Spanish	35,496	23.0%
Households Speaking Other Indo-European languages	6,248	4.1%
Households Speaking Asian and Pacific Island languages	4,235	2.7%
Households Speaking Other languages	2,578	1.7%

City of Tampa	Number	Percentage of Total HHs
All Limited English-speaking households (HHs)	10,613	6.89%
Spanish-speaking HHs with Limited English-speaking	8,543	5.55%
Other Indo-European language-speaking HHs with Limited English-speaking	661	0.43%
Asian and Pacific Island language-speaking HHs with Limited English-speaking	938	0.61%
Other language-speaking HHs with Limited English-speaking	471	0.30%

City of Tampa	Number	Percentage
Total Population	355,236	100%
Population Below Poverty Level	62,049	17.47%
Population Below Poverty Level that Speak only English	39,699	11.18%
Population Below Poverty Level that Speak Spanish	18,584	5.24%
Population Below Poverty Level that Speak Indo-European languages	1,896	0.54%
Population Below Poverty Level that Speak Asian and Pacific Island languages	518	0.15%
Population Below Poverty Level that Speak other languages	1,352	0.38%

The TOHR will continue to monitor shifts in the population and demographics to ensure that the LEP population has meaningful access to all services and supports available. Specifically, the future release of Census data from the current ongoing 2020 Census will be integral in the revision of any directives set forth in this plan. The TOHR and HCD will also use the following practices to identify LEP persons in the day-to-day operations with the public:

- Recognize self-identification by the speaker of a language other than English
- Examine the possibility that the person is a LEP individual if communication seems impaired
- Allow persons to self-identify as a LEP individual
- Provide notification that language assistance is available
- Use “I Speak” language identification cards or posters
- Collect primary language data from individuals when they initially access programs and services

Language Assistance Services

The TOHR and HCD recognizes that LEP individuals may interact with staff in a number of ways, including:

- Outreach programs
- Public meetings or requests for public response/comments
- Brochures and newsletters
- Written materials
- Applications or requests for assistance
- Requests for information via email, mail, and telephone
- Public access to information on the City website
- Day-to-day operations

Due to the wide range of encounters that LEP individuals may have with the TOHR and HCD staff, a variety of language services will be promoted and provided to these individuals. To determine the extent of language services provided, the Four-Factor Analysis was implemented to identify any group as meeting the 1,000 or 5% LEP threshold for the provision of language assistance services. The group that met the threshold is Households Speaking Spanish, consisting of 23% (or 35,496) of all households in the City. Of those LEP households, the number of Spanish-speaking Households with Limited English-speaking is 5.55% (or 8,543) of all households. Federally-funded programs, particularly programs administered by HUD, can use income limits for qualification. In Tampa, the population Below Poverty Level that Speak Spanish is 5.24% (or 18,584) of all persons. For these LEP populations, the TOHR and HCD has Spanish-English bilingual staff available, and both oral and written language assistance services will be provided.

Oral Language Assistance

Oral language assistance may be needed for interactions with LEP individuals over the phone, in person, at public meetings, etc. When these interactions occur, staff members will carry out the following protocol:

For communication over the phone:

The staff member will make every effort to identify the primary language of the individual. If that staff member is bilingual in the individual’s primary language, then the staff member may assist the LEP individual directly. If the staff member is not bilingual in that language, then that staff member will

transfer the call to another staff member who is bilingual, as listed in the Staff Directory. If not immediately available, a bilingual staff member will return the call of the LEP individual within 24 hours.

For communication in person:

The staff member will first try to identify the primary language of the individual using open-ended questions requiring a full sentence answer or “I Speak” language cards/poster if necessary. If that staff member is bilingual in the individual’s primary language, then the staff member may assist the LEP individual directly. If the staff member is not bilingual in that language, then the staff member will contact another staff member who is bilingual to assist the individual. If no bilingual staff member is available to assist the individual at that time, then an approved bilingual volunteer, telephone/computer translation service, or contractor interpreter may be used to communicate with the LEP individual without any cost of the LEP individual. Staff may utilize Google Translate for quick assistance or to collect contact information so that a bilingual staff member may contact the LEP individual for follow-up. In emergency or urgent/immediate circumstances, staff may not be able to offer free language services, and temporary use of family members or friends as interpreters may be necessary. If staff informs an LEP person of the right to free interpreter services, and the LEP person declines such services and requests the use of a family member or friend, the staff may use the family member or friend if the use of such a person would not compromise the effectiveness of services or violate the LEP person's confidentiality.

For public meetings

A bilingual staff member or interpreter will be available for Spanish-speaking households at TOHR and HCD public meetings and events.

Written Language Assistance

Written language assistance may be needed for a number of documents, notices, forms, advertisements, etc. The HUD Office of Fair Housing and Equal Opportunity (FHEO) provides documents created by HUD program offices printed in English and other languages. These translated materials include brochures, fact sheets, booklets, public service announcements, and program forms, and will be available for use by TOHR and HCD staff for LEP individuals.

The Spanish-speaking LEP community meets the threshold for a group that constitutes 10% or 3,000, whichever is less, of the population of persons eligible to be served or likely to be directly affected by Federally-funded programs within the City of Tampa. Vital documents will be available in translated form and made accessible to the Spanish-speaking LEP community. A document may be considered vital if it contains information that is critical for obtaining federal services and/or benefits or is required by law. Vital documents may include applications, consent and complaint forms, notices of rights, or letters or notices that require a response from the client. Documents will be classified as vital by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences of associated with the document, and the organizational resources. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Translated documents may be accompanied by the following disclaimer:

“This translation document is provided to you as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document.”

In addition to vital documents, notices of TOHR and HCD public hearings or events will include key information translated for the Spanish-speaking LEP community.

Language groups that constitute fewer than 10% person of the City's population and need language assistance will be notified, in their primary language, that they have the right to receive competent oral translation of written materials.

Guidelines for Interpreters and Translators

While no formal certification is required for interpreters, translators, or staff members listed in the Staff Directory as bilingual, individuals providing interpretation or translation services will:

- Be proficient in and able to communicate information accurately in both English and the other applicable language
- Understand agency-specific terminology
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner

LEP individuals may bring another individual to provide interpretation who has not been approved for formal interpretation services by the City. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided
- Use a formal interpreter instead of the informal interpreter, particularly if the subject matter of the encounter may be prone to conflicts of interest
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need

When working with or as an interpreter, formal or informal, staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed
- Briefly explain to the interpreter any technical terms that may come up during the communication
- Avoid the use of acronyms, double negatives, and contractions
- Speak in short sentences that contain one idea at a time
- Talk to the applicant and not to the interpreter
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea

Providing Notice of Language Assistance Services

To ensure that members of the LEP communities are aware of the free language assistance services provided to them, the following outreach steps will be taken:

- Provide "I Speak" language identification cards to TOHR and HCD staff
- Place translated program/public service materials in central/front office location
- Update Spanish-language content on the TOHR and HCD website
- Provide notifications of services with program/public service materials

Training Staff on LEP Policies and Services

All staff for TOHR and HCD will receive training on the importance of providing meaningful information and services to LEP communities in ways that are helpful and easily understood. The training materials will be provided to new employees and periodically as a refresher to all staff at staff meetings. Upon completion of the training, staff should understand and recognize:

- Their obligation to provide meaningful access to information and services to LEP individuals
- The protocol for handling various encounters with LEP individuals, as established by this plan
- Approved bilingual staff members
- How to access translated materials and interpretation services for provision to LEP individuals


Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals. To be considered a bilingual staff members, those persons: will be a native speaker of the non-English language; have speaking proficiency equivalent to that of an educated native speaker; or will self-certify at a rating of ILR Level 4 (or higher) – Full Professional working proficiency -- according to the Interagency Language Roundtable (ILR) Scale. The ILR Scale is the standard grading scale for language proficiency for the Federal Government, and staff can confirm their rating level at <https://www.icls.edu/foreign-language-programs/ilr-proficiency-levels/>.

Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the TOHR will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, the TOHR will make use of the following mechanisms:

- Survey staff on how often language assistance services are used and how they could be improved
- Observe and evaluate TOHR and HCD interactions with LEP individuals
- Solicit feedback from community-based organizations and other stakeholders
- Keep current on community demographics by engaging with local resources
- Monitor the agency's response rate to suggestions or requests by LEP individuals
- Maintain a record of available services for LEP individuals and the frequency of their use, if possible/applicable
- Maintain a record staff time or funds spent on language assistance services, if possible/applicable

Adopted on by



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