

LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE ASSISTANCE PLAN

1. Introduction

Forward Pinellas has developed this Limited English Proficiency (LEP) Language Assistance Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO 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 extent of Forward Pinellas' obligation to provide LEP services, the agency 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 county to be served or likely to encounter an MPO program, activity or service; 2) the frequency with which LEP individuals come in contact with an MPO program; 3) the nature and importance of the program, activity or service provided by Forward Pinellas to the LEP population; and 4) the resources available to Forward Pinellas and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

2. Four Factor Analysis and Results

2.1 The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity or service.

According to the US Census Bureau, the 2013 – 2017 total population estimate of Pinellas County citizens five years of age and older was 907,232. Based on a review of American Community Survey data for this period, it was determined that approximately 126,579 people in Pinellas County, 14 percent, spoke a language other than English at home and 46,416 people, 5.1 percent of the population spoke English less than “very well.” Aside from English, the language spoken by most people in Pinellas County, 58,647 (6.5 percent), during this period was Spanish.

**Table 2. Pinellas County Population Five Years of Age and Older 2013-2017
Languages Spoken At Home**

Population Group	Pop.	%age of Total Pop.
Speak English only	780,653	86%
Language other than English spoken at home	126,579	14%
Speak English less than "very well"	46,416	5.1%
Spanish		
Persons who speak Spanish at home	58,647	6.5%
Speak English less than "very well"*	22,383	2.5%
Indo-European		
Persons who speak European languages at home	42,068	4.6%
Speak English less than "very well"*	12,891	1.4%
Asian and Pacific Islander languages		
Persons who speak Asian and Pacific Islander languages at home	20,812	2.3%
Speak English less than "very well"*	9,740	1.1%
Other Languages		
Persons who speak other languages at home	5,052	0.6%
Speak English less than "very well"	1,402	0.2%

Source: US Census Bureau 2013-2017 American Community Survey

Language translation services for LEP individuals are available at Forward Pinellas meetings and events. Forward Pinellas also 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. For example, the agency conducted a trail survey in 2014. This survey was available in English and Spanish. Spanish speaking staff were available to assist those not comfortable with the written versions of the survey. Forward Pinellas works with local community groups to assist in outreach to LEP persons.

When engaging with LEP populations, Forward Pinellas determines the best method for engagement depending on the situation. This may include written or verbal translation, potential literacy skills, and the identified language barrier.

2.2 The frequency with which LEP individuals come in contact with an MPO program, activity or service.

Listed below are the LEP requests received and fulfilled by Forward Pinellas from January 1, 2006 to December 31, 2018. None have been received since 2016.

- 2 - Spanish speaking interpretation

- 1 - Spanish translation of a Forward Pinellas document
- 2 - American Sign Language requests
- 1 - Braille translation of a Forward Pinellas document
- 8 - Reading assistance

LEP populations may also interact with Forward Pinellas at various public outreach events. As described in Four Factor Analysis Area 1, Forward Pinellas provides materials in Spanish and staff translations for LEP individuals attending events the agency sponsors.

2.3 The nature and importance of the program, activity or service provided by Forward Pinellas to the LEP community.

Since there is a large concentration of Hispanics in Clearwater, Forward Pinellas has contacted the YWCA Hispanic Outreach Operation (Centro de Apoyo Hispano de YWCA) in Clearwater for help in identifying MPO programs that would be of importance to a Hispanic LEP person. This included long-range transportation planning and also work with the Transportation Disadvantaged (TD) Program. The Hispanic Outreach Operation identified transportation as a major concern for their clients since many of them do not drive and rely on public transit, walking or bicycling. To help these individuals and other Spanish citizens in the county facing similar circumstances, the county's transit operator, the Pinellas Suncoast Transit Authority (PSTA), translated its system route map and several brochures to Spanish. Forward Pinellas has also translated several bicycle and pedestrian safety brochures to Spanish.

Many Hispanic Outreach Operation clients are economically disadvantaged and are eligible to receive low cost transportation services through the Pinellas County Transportation Disadvantaged (TD) Program. As the TD Program's community transportation coordinator (CTC), PSTA and its taxi cab and wheelchair providers have Spanish speaking staff readily available to provide language assistance.

In the development of a new LRTP, which takes place every five years, Forward Pinellas utilizes Spanish outreach materials and related staff assistance to ensure that the LEP community is engaged in the Forward Pinellas public involvement process. Forward Pinellas also reaches out to social service and other non-profit agencies serving LEP communities identified through Environmental Justice analysis to provide their clients with opportunities to participate in LRTP public involvement activity. These agencies have included the High Point Neighborhood Family Center, Union Academy Family Center/Citizens Alliance for Progress, and the Lealman and Asian Neighborhood Family Center.

2.4 The resources available to Forward Pinellas and overall costs.

Forward Pinellas periodically assesses its resources and needs for providing LEP

assistance. This includes identifying staff and volunteer language interpreters that are readily available, the cost of a professional interpreter and translation service, and documents that need to be translated. It also involves identifying organizations Forward Pinellas can partner with for outreach and translation efforts, financial and in-kind sources available to provide assistance and determining staff training needs.

Forward Pinellas has staff available for Spanish speaking LEP citizens as necessary. The agency also maintains contact information for language interpretation services and utilizes these for document translation. Community group resources are also maintained and utilized for outreach efforts. The Pinellas County Office of Human Rights is a reliable resource for the agency and can provide translation services.

Based on the four factor analysis considerations described above, procedures for the Forward Pinellas LEP Language Assistance Plan were developed. These procedures are presented in the following section.

3. Assistance Services, Monitoring and Evaluation

3.1 How to Identify an LEP Person who Needs Language Assistance

- Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- When Forward Pinellas sponsored workshops or conferences are held, set up a sign-in sheet table where a staff member will greet each attendee. To informally gage the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.
- Provide a Census Bureau "I Speak Card" at the workshop or conference sign-in table to attendees requiring language assistance. While staff may not be able to provide translation assistance at this meeting, the cards are an effective way to identify language needs for future meetings.

3.2 Language Assistance Measures

When an interpreter is needed in person or on the telephone, Forward Pinellas shall first determine which language is required. Staff can provide Spanish and French 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 MPO document translation requests from LEP persons.

3.3 Staff Training

All Forward Pinellas staff is provided with the LEP Language Assistance Plan and educated on procedures and services available. This information will also be part of the staff orientation process for new hires. Training topics are listed below.

- Understanding Title VI LEP and Language Assistance Plan responsibilities
- Language assistance services provided by Forward Pinellas
- Use of LEP “I Speak Cards”
- How to access a staff interpreter
- Documentation of language assistance requests
- How to handle a Title VI complaint
- The importance of educating subrecipients on LEP program responsibilities and their obligation to provide language assistance.

3.4 Providing Notice of Available Language Service to LEP Persons

Information on language assistance services available to the public are noticed/posted in public buildings, on the Forward Pinellas website and in the agency’s office location. This information is also included with agendas and in legal advertisements.

3.5 Outreach Techniques

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

- If Forward Pinellas is presenting a topic that could be of potential importance to an LEP person or if the agency is hosting a meeting or workshop proximate to an LEP community, meeting notices, fliers, advertisements and agendas will be printed in an alternative language, such as Spanish.
- When advertising a public meeting notice, staff will insert “**Un traductor del idioma español estará disponible**” in the copy. This means “A Spanish translator will be available.” If the need for translation is not known, the copy should include, “**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.**” This asks individuals needing Spanish language assistance to make the necessary arrangements with Forward Pinellas 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.

3.6 Monitoring and Updating the LEP Language Assistance Plan

A Title VI Program update must be forwarded to the FTA every three years. Forward Pinellas will follow the same schedule for the update of the LEP Language Assistance Plan. The questions listed below will be considered in updating the plan.

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Pinellas County?
- 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 Forward Pinellas programs and are there other programs that should be included?
- Have Forward Pinellas' available resources, such as technology, staff and financial costs changed?
- Has Forward Pinellas fulfilled the goals of the LEP Language Assistance Plan?
- Were any complaints received?

3.7 Dissemination of the Forward Pinellas Limited English Proficiency and Language Assistance Plan

The LEP Language Assistance Plan is posted on the Forward Pinellas website at the link below. For those without personal internet service, all Pinellas County libraries offer free internet access. Copies of the LEP Language Assistance Plan are provided to the Pinellas County Office of Human Rights, the Florida Department of Transportation, Federal Highway Administration, Federal Transit Administration and to citizens upon request. Each Forward Pinellas subrecipient is provided a copy and informed of the importance of providing language assistance. LEP persons may obtain translations of the plan upon request. Any questions or comments regarding the LEP Language Assistance Plan should be directed to Forward Pinellas staff at 727-464-8250 or info@forwardpinellas.org.

<http://forwardpinellas.org/wp-content/uploads/2017/02/Limited-English-Proficiency-and-Language-Assistance-Plan-from-Title-VI-Plan.pdf>