

CITY OF ANAHEIM TITLE VI PLAN

Updated 11/20/19 English only version
This document is available in other languages upon request.

Original created on February 2016

CITY OF ANAHEIM
TITLE VI PLAN (English Version)

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**NOTICE TO PUBLIC
CITY OF ANAHEIM
RIGHTS UNDER TITLE VI**

The City of Anaheim gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Acts of 1964 and related regulations. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Authority: Executive Order (EO) 13166 - Improving Access to Services for Persons with Limited English Proficiency, August 2000 is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are LEP. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

If you believe you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under this City of Anaheim program, you may file an official Title VI complaint with the City. We encourage you to make your complaint in writing. A complaint must be filed within 180 days after the date of the alleged discrimination. The Title VI Complaint Procedures and Complaint Form can be obtained on the City’s Disability and Civil Rights Program web page or contact the ADA/Title VI Coordinator.

- Title VI Complaint Procedures
- Title VI Complaint Form

To request an alternate format of this Notice or for additional information on the City of Anaheim's nondiscrimination obligations, please contact the City by mail, telephone or email using the information below:

ADA/Title VI Coordinator
955 S. Melrose Street
Anaheim, CA 92805
(714) 765-6803
ADA@anaheim.net

This Notice is posted on the City’s Website, on all City break room bulletin boards, and at public counters. Foreign language and ASL video interpreting service is available upon request.

**NOTICE TO PUBLIC
LOCATIONS**

GOVERNMENT FACILITIES

City Hall East
200 S. Anaheim Blvd.
Anaheim, CA 92805

Anaheim West Tower (AWT)
201 S. Anaheim Blvd.
Anaheim, CA 92805

Transit Vehicles: City Hall West
201 S. Anaheim Blvd.
Anaheim, CA 92805

City of Anaheim website www.anaheim.net

**CITY OF ANAHEIM
DISABILITY AND CIVIL RIGHTS PROGRAM
ADA TITLE II AND TITLE VI GRIEVANCE PROCEDURES**

GRIEVANCE POLICY

The City of Anaheim is committed to ensuring that people with disabilities are able to take part in and benefit from, the variety of public programs, services, and activities offered by the City. The City of Anaheim continues to modify its facilities, programs, policies, or practices as necessary to ensure such access is provided.

GRIEVANCE PROCEDURE

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), and ADA Amendments Act of 2008, the City of Anaheim (City) does not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Under Title VI of the Civil Rights Act of 1964 as amended in 1972, 1978 and 1992, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance by the City of Anaheim.

The Americans with Disabilities Act and Title VI requires that public entities adopt and publish grievance procedures to assure the prompt and equitable resolution of any grievance. The purpose of this grievance procedure is to resolve as promptly as possible any problems, grievances, or conflicts related to the City's compliance without the need for the grievant to resort to other remedies available under the law.

Contents:

1. Who may file a grievance?
2. When should a grievance be filed?
3. What should the grievance include?
4. What if I need assistance filling out my grievance?
5. What happens after I file my grievance?
6. When will I receive a response?
7. Should I be concerned that a city office or employee might retaliate against me if I complain?
8. What can I do if I am not satisfied with the initial investigation by the department?
9. How long are complaints kept?

1. Who may file a grievance?

You or your authorized representative may file a grievance if you believe that:

The City is not in compliance with the physical access requirements of the Americans with Disabilities Act related to its public facilities, land, or right-of-ways, or

You or a specific class of individuals have been denied access to participate in any City program, service, or activity on the basis of race, color, sex, age, national origin, or disability, or you or a specific class of individuals have been otherwise subjected to discrimination on the basis of race, color, sex, age, national origin, or disability by the City of Anaheim, or the City has otherwise violated the ADA or Title VI.

This is not for employment or employee related issues.

2. When should a grievance be filed?

Before filing a grievance, you may seek informal resolution by contacting the Department Liaison in the applicable department. If your informal concern is not resolved in a timely fashion, you may file a formal grievance under this procedure. You are encouraged to file your grievance as soon as possible within 180 business days.

3. What should the grievance include?

The grievance should be in writing and contain information about the grievance, submission date, name, address, telephone or cell phone number of grievant, location, date and description of the problem. An alternate means of filing grievances, such as personal interviews or audio recording of the grievance, will be made available for people with disabilities upon request. Click on the link for a grievance form available for your convenience.

4. What if I need assistance filling out my grievance?

Grievances may be filed by mail, telephone, or email. Assistance is available from the City Department Liaison.

5. What happens after I file my grievance?

After receiving your grievance, the Department Liaison will investigate within 15 business days. The investigation may include you and any other person(s) the investigator believes to have relevant knowledge concerning your grievance. The investigator will also consider any written evidence submitted. After completing the investigation, the investigator will review the factual information gathered. The Department Liaison will then issue a written response.

6. When will I receive a response?

The Department Liaison will provide a response within 15 business days.

7. Should I be concerned that a city officer or employee might retaliate against me if I complain?

The City does not retaliate against you for filing a grievance and does not permit retaliation by its officers or employees. Please notify the City Department Liaison of any retaliation.

8. What can I do if I am not satisfied with the initial investigation by the department?

If you are not satisfied with the response you may submit an appeal within 15 business days of your receipt of the response to the ADA/Title VI Coordinator at ADA@anaheim.net stating the reasons for the appeal.

Within 15 business days after receipt of the appeal, the ADA/Title VI Coordinator/ADA Task Force will meet with the grievant to discuss a resolution. Within 15 business days after the meeting, the ADA/Title VI Coordinator will respond with a final resolution.

You may file your appeal with the City's designated ADA/Title VI Coordinator:

ADA Coordinator
City of Anaheim
P.O. Box 3222, Mail Stop 19
Anaheim, CA 92803
Office (714) 765-6803
Fax (714) 765-6899
TTY (714) 765-5125
ADA@anaheim.net

If you are not satisfied with the results of the appeal, you may file a complaint with the appropriate agency or department of the State or Federal government. Contact the U.S. Department of Justice, the U.S. Department of Education Office for Civil Rights, Federal Transit Administration (FTA) or the California Department of Justice Civil Rights Division for information about how to file a complaint with these agencies at www.ada.gov.

Using this grievance procedure is not a prerequisite to pursuing any of your other remedies. However, in the interest of a prompt resolution of the grievance, the City encourages you to use this procedure in addition to any other available alternatives you may choose.

9. How long are grievances kept?

All grievances received by the Department Liaison and appeals to the ADA/Title VI Coordinator will be kept by the City of Anaheim for at least three (3) years.

10. Appeal to Federal Transit Administration – Regional Level

If the Complainant wishes to appeal the decision, she or he has 30 days after the date of the letter to do so. Complainant may contact the Federal Transit Administration, Regional Civil Rights Officer, 201 Mission Street, Suite 650, San Francisco, CA 94105- 1839, (415) 744-2729, Fax - (415) 744-2726.

11. Appeal to Federal Transit Administration - National Level

A person may also file a Title IV complaint, no later than 180 days after the date of the alleged discrimination, directly to the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue., SE, Washington DC 20590.

City of Anaheim-Disability & Civil Rights Program
ADA Title II and Title VI Grievance Form

Instructions: Please fill out this form completely in black ink or type. Sign, mail to Department Liaison or drop off at City Hall-Clerk's Office, 200 S. Anaheim Blvd., 2nd Floor Anaheim, CA 92805. Visit link to List of Department Liaisons. **This form is optional for visitors, residents, and public. This is not for employment or employee related issues.**

Grievant Name: _____

Address: _____

Email Address: _____

Telephone: _____ Work: _____ Cell: _____

If a legally authorized representative is filing the grievance on your behalf, his/her name, address and telephone number must also be included:

Name: _____

Address: _____

Email Address: _____

Telephone: _____ Work: _____ Cell: _____

Please check off why you believe the discrimination occurred:

- | | | |
|--|-------------------------------------|--|
| <input type="checkbox"/> Race or Color | <input type="checkbox"/> Age | <input type="checkbox"/> National Origin |
| <input type="checkbox"/> Sex | <input type="checkbox"/> Disability | <input type="checkbox"/> Other _____ |

Date of Incident: _____ Time of Incident: _____

Location or address of incident: _____

Describe your grievance: _____

What type of corrective action would you like to see taken? _____

If the incident(s) involved a City of Anaheim employee(s), please include his/her name(s): _____

The name(s) and contact information of witnesses: _____

If your grievance is being filed on behalf of another person or a group of people, all of the grievant(s) should be described or identified by name, if possible. _____

Grievant: _____ Date: _____

Legally Authorized Representative: _____ Date: _____

Make a copy for your record.

Revised 10.8.19

CITY OF ANAHEIM
TITLE VI

LIST OF TRANSIT-RELATED INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

The City of Anaheim currently does not have any transit-related investigations, complaints or lawsuits with regards to Civil Rights Violations.

CITY OF ANAHEIM
TITLE VI - PUBLIC PARTICIPATION PLAN

PURPOSE

The City of Anaheim's Public Participation Plan is organized to work in concert with the Title VI Plan and the Limited English Proficiency Plan. The purpose of the Public Participation Plan is to establish procedures that allow for, encourage, and monitor participation of all citizens living and working in the City, and users of public transportation. Special attention will be paid to soliciting input from low-income and minority communities that are traditionally underrepresented. The City's Anaheim Anytime is a tool readily available to make a request, complaints, or comments and serves as effective channels of communication for the City to engage the citizenry.

The outreach techniques will be used to solicit input for the Public Participation Plan. The various techniques will be used as applicable at neighborhood and community meetings. Cognizant of individuals with Limited English Proficiency, material will be developed at a fourth grade reading level and translated in Spanish and other languages upon request.

GOALS AND OBJECTIVES

The City's public involvement plan has a single comprehensive goal: to allow the public opportunities throughout the planning process to influence decisions. In order to meet this goal, the City has established the following objectives:

1. Identify the most appropriate methods for reaching the public.
2. Determine whether there are any barriers to public participation within the Anaheim area (i.e. non-English language or other cultural barriers.)
3. Hold meetings in locations which are accessible and reasonably welcoming to all area residents, including but not limited to, low-income and minority members of the public.
4. Keep the public informed through effective channels of communication and allow input from those not likely to attend meetings.
5. Work to actively involve the public in programs, policy-making and projects.
6. Ensure that the City's public involvement plan is dynamic and responsive.
7. Use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the internet.

IDENTIFICATION OF STAKEHOLDERS

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

General Citizens: The U.S. Census Bureau provides estimates of demographic information through the American Community Survey (ACS). The U.S. Census Bureau estimates that City of Anaheim has 349,007 residents based on the 2013-2017 Five-Year American Community Survey. The U.S. Census Bureau collects race data in six categories: White; Black or African American; American Indian or Alaska Native; Asian; Native Hawaiian or Other Pacific Islander; and Some Other Race. Additionally, the American Community Survey ask respondents on whether they identify their origin as Hispanic, Latino, or Spanish. As such, people who identify their origin as Hispanic, Latino, or Spanish may be of any race.

Between 2013 and 2017, the ACS indicates that 25.2 percent of residents identify as White alone; 16.3 percent of residents identify as Asian alone; 2.2 percent of residents identify as Black or African American alone; 1.9 percent of residents identify as two or more races alone; 0.3 percent of residents identify as Native Hawaiian and other Pacific Islander alone; 0.1 percent of residents identify as American Indian and Alaska Native alone; and 0.1 percent of residents do not identify with these racial categories. In this same period, the ACS indicate that 53.8 percent of residents identify with a Hispanic, Latino, or Spanish origin. The ACS also indicates that 61.5 percent of Anaheim residents over 5 years of age speak a language other than English at home.

Low-income: Between 2013 and 2017, the percentage of families and people whose income was below the poverty level was 12.9% and 16%, respectively. All Anaheim residents should be given every reasonable opportunity to provide input on transportation plans and programs (Data Source: 2013-2017 American Community Survey 5-year Estimate)

Public Agencies: Public agencies can provide valuable input to the planning process, in addition to assisting in gaining attention from traditionally under-represented populations.

Private Organizations and Businesses: Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employees. For that reason, representation of private business interests will be welcomed in the planning process.

OUTREACH TECHNIQUES

Engaging minority and Limited English Proficiency populations can be challenging. Below is a list of outreach techniques that the City may use to actively solicit public input in the planning process of a project.

Newsletters:

The *Anaheim Magazine* and *Anaheim Your Community* quarterly newsletters will be available in both print and e-formats. Newsletters provide the public and local government partners with progress updates on projects and programs. These newsletters will provide a frequent channel of communication with the public and allow the public to stay informed.

Website:

A well organized and engaging website is the cornerstone of the City's communication strategy. The website will offer a user-friendly structure and linguistic style understandable to lay people interested in projects and the planning process. In addition, the website will be developed following the guidelines of Section 508 of the Rehabilitation Act.

Social Media:

The City will utilize common social media forums (Facebook, Twitter, etc.) to disseminate project information.

Public Notices:

The City will include notations in public notices in appropriate non-English languages that will provide a contact where the individual can be informed of the process/project, and will have an opportunity to give input.

Public Meetings & Focus Groups:

The City will host public meetings and focus groups to discuss topics/projects of interest with the public. When hosting public meetings, the City will provide adequate notice to the public and follow all federally prescribed guidelines regarding public comment periods. The City will make a good faith effort to notify the public, such as posting in work places. At meetings, the City will utilize visualization aides, such as power-points and maps to assist the public in understanding the situation.

Contracted Language Interpretation Services:

The City has a service contract to provide foreign language and American Sign Language interpreting services. Language identification cards are made available at public counters and service can be provided upon request. In addition, full Spanish interpretation services are provided at all City Council meetings, through the use of headsets.

The City has a service provider to translate written documents of vital information identified by the Departments business needs and upon request. Considerations to convert text to target language are localization, internationalization, and globalization.

Outreach Techniques	Frequency
Anaheim Magazine	Quarterly
Your Community (Publication)	Quarterly
City Webpage	Monthly
Social Media (Facebook, Twitter)	Monthly
Neighborhood Council Meetings	Quarterly
Public Meetings	Frequency varies per Project

PERFORMANCE METHODS

On an annual basis, the City will undertake an internal review of its public participation plan's effectiveness of engaging the public, by examining criteria, such as:

- Records from public meetings,
- Records of responses to citizen email, and
- Input from the general public

PUBLIC PARTICIPATION PLAN (PPP)

Availability of this plan for review will be advertised in a manner reasonably expected to reach the general public, as well as minority populations, low-income persons, and traditionally under-served populations. This could occur through outreach techniques mentioned earlier in this document. Notification to stakeholders is available in English and Spanish, and other languages upon request.

The City of Anaheim also receives funding from the Orange County Transportation Authority (OCTA) to provide local transportation for seniors, operating the Senior Mobility Program. Through the City's Senior Mobility Program, the City provides seniors accessible door-to-door, low-cost, transportation services to older adults that are unable to drive or use public transportation services due to physical ailments. Senior citizens in need of the service are picked-up at their Anaheim residence and may receive transportation services to various locations including locations inside the City of Anaheim's city limits within a 10 mile radius of their home, to the City's Congregate Meal Program, nearest City of Anaheim Community Center or Library for the purpose of using the site or connecting with the OCTA ACCESS program, to non-emergency medical appointments, shopping, personal services, social/recreational activities, and special events.

For project information, please contact:

ADA Coordinator City of Anaheim
P.O. Box 3222, Mail Stop 19
Anaheim, CA 92805
Office (714) 765-6803
Fax (714) 765-6899
TTY (714) 765-5125
ADA@anaheim.net

CITY OF ANAHEIM
Limited English Proficiency (LEP) Plan
TITLE VI

I. PURPOSE

To establish guidance for the City of Anaheim to provide timely and reasonable language assistance to Limited English Proficiency (LEP) persons who come in contact with the City. This plan is established pursuant to and in accordance with Title IV of the Civil Rights Act of 1964 and its implementing regulations and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency."

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Executive Order 13166 was adopted to improve access to federally conducted, and federally assisted programs and activities for persons who as a result of national origin, are limited in their English proficiency. This plan reiterates the City of Anaheim's position that it will provide the language assistance necessary for meaningful participation in its programs and services to persons who, as a result of national origin, are limited in English proficiency.

II. REFERENCES

- U.S. Census Bureau, 2013-2017 American Community Survey Five-Year Estimates.
- U.S. Census Bureau, 2017 American Community Survey One-Year Estimates.
- Federal Register, Volume 68, Number 103, Civil Rights Center; Enforcement of Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: Notice (May 29, 2003)
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000)
- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 26-02, Publication of Revised Guidance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (May 29, 2003)

III. BACKGROUND

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In order to avoid discrimination against LEP persons on the grounds of national origin, we must take reasonable steps to ensure that such persons have meaningful access to the programs, services, and information.

Language barriers prohibit LEP persons from obtaining services and information relating to a variety of services and programs because they may not be able to read instructions or correspondence written in English and may not understand verbal information. Many times, they are not aware of regulatory requirements and legal implications of the services they seek. When LEP persons receive legal documents, they often do not understand the contents of the correspondence and its implication to their daily lives. LEP persons may not be able to take advantage of services, which could affect their job and social opportunities. When individuals do not understand or read English, they can be hampered in seeking employment opportunities.

IV. GOALS

It is essential that City staff be informed about their diverse clientele from a linguistic, cultural and social perspective. These individuals will be culturally competent so they can encourage vulnerable LEP minority populations to access and receive appropriate services with more knowledge and confidence. The key to providing meaningful access to LEP persons is to ensure that LEP persons can communicate effectively and act appropriately based on that communication. Minimum reasonable measures would be to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in programs or activities.

Spanish is the most requested language for interpreters in the City of Anaheim. City staff will make designated publications available in languages other than English, and provide interpretation/translation services to persons who are not proficient in English.

The City will take reasonable steps to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in recipient programs or activities, where appropriate. Written vital documents identified by program can be translated by contracted service provider upon request.

V. FOUR FACTOR ANALYSIS

The first section in this document describes the purpose of the Limited English Proficiency Plan (LEP). The second section in this document provides the four-factor Limited English Proficiency (LEP) analysis as outlined in the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

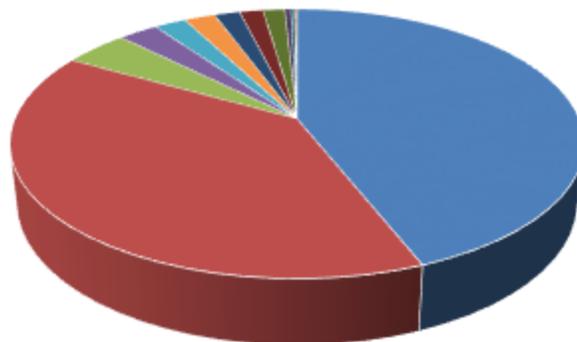
1. The number or proportion of LEP persons in the service area who may be served by the City.

City staff reviewed the 2017 American Community Survey (ACS) One-Year Estimate to determine the approximate number of LEP persons age five-years and older in the City of Anaheim. The ACS indicated that approximately 61.5% of Anaheim residents speak a language other than English at home.

Population by Language Spoken at Home in Anaheim	Estimate	Percentage	Margin of Error
Total:	331,115	100.00%	+/-3,072
Spanish - 44%	145,701	44.00%	+/-8,857
Speak only English - 39.16%	129,661	39.16%	+/-6,993
Vietnamese - 4.35%	14,406	4.35%	+/-3,192
Tagalog (incl. Filipino) - 2.66%	8,799	2.66%	+/-2,531
Other Asian and Pacific Island languages - 2.15%	7,120	2.15%	+/-4,734
Other Indo-European languages - 2.08%	6,900	2.08%	+/-2,368
Arabic - 1.72%	5,700	1.72%	+/-2,361
Korean - 1.58%	5,228	1.58%	+/-1,518
Chinese (incl. Mandarin, Cantonese) - 1.47%	4,860	1.47%	+/-1,507
Other and unspecified languages - 0.41%	1,354	0.41%	+/-1,011
German or other West Germanic languages - 0.26%	857	0.26%	+/-529
French, Haitian, or Cajun - 0.13%	425	0.13%	+/-460
Russian, Polish, or other Slavic languages - 0.03%	104	0.03%	+/-102

Data Source: [U.S. Census Bureau, 2017 American Community Survey One-Year Estimate \(Table C16001\)](#).

2017 CITY OF ANAHEIM POPULATION BY LANGUAGE



- Spanish - 44%
- Speak only English - 39.16%
- Vietnamese - 4.35%
- Tagalog (incl. Filipino) - 2.66%
- Other Asian and Pacific Island languages - 2.15%
- Other Indo-European languages - 2.08%
- Arabic - 1.72%
- Korean - 1.58%
- Chinese (incl. Mandarin, Cantonese) - 1.47%
- Other and unspecified languages - 0.41%
- German or other West Germanic languages - 0.26%
- French, Haitian, or Cajun - 0.13%
- Russian, Polish, or other Slavic languages - 0.03%

Data Source: U.S. Census Bureau. 2017 American Community Survey One Year Estimate

2. The frequency with which LEP persons come in contact with City programs, activities or services.

We have a wide variety of people from various backgrounds who participate in our programs and services representing diverse age groups, ethnicities, abilities, and languages spoken. While we do not collect average statistics across all City programs, we are prepared to serve people who speak multiple languages via a multi-pronged approach consisting of interpreters, translated written material, and a website and social media that are available in multiple languages.

3. The nature and importance of programs, activities or services provided by the City to the LEP Population.

The City recognizes that per the U.S. Census Bureau, 2017 American Community Survey One-Year Estimate 61.5% of the City population spoke a language other than English at home. In addition, the most frequently requested interpretation services are in the Spanish language. The City offers a wide variety of customer service assistance through the various City Departments. The provision of resources, direct services, and programs through our public facilities, including but not limited to, our Community Centers, Libraries, Senior Centers, Family Resource Centers, and Youth Centers, play a significant role in allowing access to social and recreational enrichment opportunities, which improve the quality of life in Anaheim.

4. The resources available to the recipient of federal funds and overall cost to provide LEP assistance.

Outreach expenses as they relate to LEP populations are shared among several departments (Personnel Services, Parks, Recreation & Community Services Agency, Police, and Community Development Agency). The City updated its website with the capability to translate information into many different languages. Most of the City's public counters have bilingual Spanish speakers, the most common language requested in the City of Anaheim. Also, available in each department is contracted service for other foreign languages at no charge. Costs for marketing materials and translation of documents for outreach are minimal and have not been quantified.

5. Summary

Based on the four-factor analysis, the City of Anaheim has identified the language needs and services required to provide meaningful access to information for the LEP residents of Anaheim. This LEP Plan will be reviewed on an annual basis and incorporate LEP information that further identify additional language needs for the top languages identified.

VI. PLANNING – DEVELOPING A LANGUAGE ASSISTANCE PROGRAM (LAP)

A. Identification of LEP Persons

City staff will use the following methods to identify LEP persons:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or from referrals to determine whether language assistance might be needed for future events or literature.
- Display language identification card which invite LEP persons to identify their language needs to our staff members. Records will be maintained in accordance with the Citywide Record Retention Schedule.
- Provide contact information on public notices who to contact to request reasonable accommodations prior to meeting date.

Safe Harbor Provision. *DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safer harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to the LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, a background documentation regarding the determination shall be provided to FTA in the Title VI Program.

The City of Anaheim provides translation of written materials for LEP populations that constitutes five percent (5%) as well as for those fewer than (5%) free of cost. The City of Anaheim agency is in full compliance with the Title VI Safe Harbor Provision.

Additionally, requests for translation of written materials through a contracted service require advanced notice. When an LEP Individual contacts the City of Anaheim Transportation Program Office for services and needs translation, the City of Anaheim Internal Bilingual Registry is utilized to translate information first.

B. Language Assistance Measures

Staff will continue to accomplish several language assistance measures to assist LEP persons, including the following:

- Translate an inventory of existing written materials in a variety of languages based on demographics, including Spanish.
- Regularly review and update these materials.
- Assure LEP persons have access to staff that are trained and competent in the skill of interpreting/translation.
- Contract with an outside interpreter service for trained and competent interpreters and American Sign Language (ASL), as needed.
- Arrange for the services of voluntary community interpreters who are trained and competent in the skill of interpreting.
- Contract for telephone language interpreter service.
- Establish a linkage between minority community-based organizations for assistance in cultural understanding and interpretation services.
- Post language identification cards and maintain signs in waiting rooms, reception areas and other initial points of entry in languages other than English. In order to be effective, these signs should inform applicants and beneficiaries of their right to free language assistance services and invite them to identify themselves as persons needing such services.
- Translate application forms and instructional, informational, and other written materials into appropriate non-English languages by competent translators.
- For LEP persons where written documents do not exist in their language, assistance should be provided from an interpreter/translator to explain the contents of documents.
- Efforts for assistance to low-frequency, unusual or unexpected languages may include, but are not limited to, using a telephone language line, and locating and temporarily employing a qualified interpreter who can communicate in the appropriate language.
- Notices and information that are generally available to the public will be made available to identified LEP populations.
- Establish uniform procedures for timely and effective telephone communication between staff and LEP persons. This will include instructions for English-only-speaking employees to obtain assistance from interpreters or bilingual staff when receiving calls from or initiating calls to LEP persons.
- Statements about the services available and the right to free language assistance services, in appropriate non-English languages, will be included in brochures, booklets, outreach and recruitment information and other materials that are routinely disseminated to the public.
- Ensure that translated materials provide referrals to telephone numbers or websites that are linguistically accessible.

C. Training

Training for front-line staff members, who are often the first points of contact with LEP individuals is provided by City Personnel. Staff training includes:

- Identifying and tracking language preference information of LEP persons;
- Delivering services effectively to LEP persons;
- Assuring staff sensitivity to the literacy level of LEP persons;
- Describing LEP services offered to the public;
- Procuring interpreter services;
- Identifying and documenting language needs of LEP persons;
- Processing a Title VI/LEP complaint;
- Familiarity with Disability Awareness, Ethics, Civil Rights and Conflict Management issues.

This LEP plan will be available electronically to all staff and included in the City's new employee orientation.

D. Providing Notice to LEP Persons

Notice of language assistance services will be accomplished as follows:

- Signs "Title VI is the Law" to be posted in the entry areas.
- At service counters Language Identification cards regarding the availability of interpreting services free of charge.
- Website, documents, community meeting notices, and brochures will be offered or printed in alternative languages upon request free of charge.
- Staff will inform LEP persons that language assistance is available and is free of charge.
- The Disability & Civil Rights Program web page has a page translation feature and contains the City's Title VI Plan.

VII. MONITORING AND UPDATING THE LEP

In July of each year, the City's ADA Task Force will review the effectiveness of the LEP Plan. The evaluation will include identification of any problem areas and development of required corrective action strategies. Elements of the evaluation may include:

- Identification of the number of LEP persons requesting interpreters/translators;
- Review of up-to-date community and demographic information;
- Determination of whether interpretation/translation services have been effective;
- Assessment of current language needs to determine if additional services or translated materials should be provided;
- Assessment whether staff members adequately understand LEP guidelines, service provider procedures, and how to carry them out;
- Gathering feedback from LEP communities at community outreach program events and meetings;
- Departments to self-assess number of licenses to renew each spring for contracted language interpretation service.

VIII. DEFINITIONS

Limited-English-Proficient Persons: Individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit provided by Anaheim Workforce Investment Board.

Linguistically Isolated: This term is defined in the Census as the percentage of the persons in households in which no one over the age of 14 speaks English well, and is used as a direct measure of those persons with a severe language barrier, as distinct from those of foreign origin who speak English well.

Low Frequency and Unusual or Unexpected Languages: An individual with limited English skills who does not speak a language spoken by a “significant number or proportion of the population.”

Qualified Interpreter: Qualified interpreter means an interpreter who is able to interpret effectively, accurately, and impartially, either for individuals with disabilities or for individuals with limited English skills. The interpreter should be able to interpret both receptively and expressively, using any necessary specialized vocabulary.

Non-English Language Relay Service: A telecommunications relay service that allows persons with hearing or speech disabilities who use languages other than English to communicate with voice telephone users in a shared language other than English, through a communications assistant who is fluent in that language.

The City's LEP Plan and Title VI Complaint Procedure are available on the City of Anaheim's website @ <http://www.anaheim.net/1740/Disability-Civil-Rights-Program>. Any person may request a copy of the LEP Plan via telephone, fax, mail, or in person and shall be provided a copy of the Plan at no cost.

Questions or comments about the LEP Plan may be submitted to:

ADA Coordinator
City of Anaheim
P.O. Box 3222, Mail Stop 19
Anaheim, CA 92803
Office (714) 765-6803 Fax (714) 765-6899 TTY (714) 765-5125
ADA@anaheim.net

TITLE VI

CITY OF ANAHEIM BOARDS AND COMMISSIONS

According to the U.S. Census Bureau, American Community Survey 2017 One-Year Estimate, the City of Anaheim's minority race/ethnic breakdown is as follows:

HISPANIC OR LATINO AND RACE	Percent
Total population	100.0%
Hispanic or Latino (of any race)	53.8%
Mexican	47.5%
Puerto Rican	0.4%
Cuban	0.3%
Other Hispanic or Latino	5.6%
Not Hispanic or Latino	46.2%
White alone	25.2%
Black or African American alone	2.2%
American Indian and Alaska Native alone	0.1%
Asian alone	16.3%
Native Hawaiian and Other Pacific Islander alone	0.3%
Some other race alone	0.1%
Two or more races	1.9%

[Data Source: U.S. Census Bureau, American Community Survey 2013-2017 Survey Estimates](#)

Through its website, the City encourages residents to become involved in their community by participating on Boards, Commissions and Committees. The City accepts applications for Boards, Commissions and Committees, on an ongoing basis and keeps them active for a two-year period.

The Maddy Act requires that the City of Anaheim post one time per year by December 31st, all upcoming vacancies (Local Appointment List). This Notice includes current members of City Boards and Commissions, the title of Boards and Commissions with vacancies, term expiration dates, and the process to apply for Boards and Commissions.

Additionally, when a vacancy occurs, notices are posted in the following locations: The kiosk at City Hall, Central Library, our local Channel 3, City Facebook page, and the Anaheim Bulletin. A Notice is posted on the City's website as well. The applications of individuals who have applied in the past two years are reviewed and notification is made to interested individuals according to the District in which they reside.

TITLE VI EQUITY ANALYSIS

The City of Anaheim Transportation Program does not have a transit-related facility, therefore, a Title VI Equity Analysis is not required.