



City of Miami

Language Assistance Plan

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City of Miami

Language Assistance Plan (“LAP”)

1. Language Access Policy

It is the policy of the City of Miami (“City”) to prohibit discrimination in all federally funded programs and services offered to its residents regardless of race, color, age, religion, gender, disability, or national origin, which includes persons with Limited English Proficiency (“LEP”). The City follows the federal mandate to make reasonable efforts to ensure that LEP applicants and beneficiaries have meaningful access to services, programs and activities for which they may be eligible. Language assistance tools are provided in the primary language spoken at home. Individuals who require language assistance or who experience discrimination because of the inability to speak, read or understand English are encouraged to advise the Office of Equal Opportunity and Diversity Programs.

2. Purpose

The purpose of the City’s Language Assistance Plan (“LAP”) is to: (1) show that the City has made reasonable efforts to help ensure that persons with limited English proficiency have meaningful access to City programs and services; (2) help prevent discrimination against LEP persons based on their national origin (which includes limited English proficiency); and (3) comply with Title VI of the Civil Rights Act of 1964.

3. Language Assistance Plan

Individuals with limited English proficiency have access to translators when needed. The City’s public announcements are provided in English, Spanish and Haitian-Creole. Language assistance is also provided to those who are hearing impaired. These services are also available upon request by the public.

In compliance with Executive Order 13166, directing recipients and sub-recipients of federal aid to ensure such discrimination does not take place, the City outlines the components of the plan below.

4. Language Assistance Plan Components

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the City programs and services:

Just over thirty-three percent (33.6%) of Miami-Dade County’s population speaks English “less than very well.” This indicates that one-third of the population has limited English proficiency. Approximately thirty percent (30%) are individuals whose primary language at home is Spanish. Approximately 1.5 percent of the population primarily speak Haitian-Creole, while a little over one percent (1%) speak “other” languages at home. ¹

¹ Data from U.S. Census Bureau (2018) American Community Survey 1 year estimates

Factor 2: The frequency with which LEP individuals come into contact with City programs and services:

According to the U.S. Census Bureau, the City of Miami had a population of approximately 450,000 as of 2019. The City provides a variety of municipal services that are potentially available to all persons living or doing business within City limits. Therefore, the frequency for contact with LEP persons is potentially high and on-going.

Factor 3: The importance of the services provided by the City:

The City provides various municipal services to the public to improve and enrich their lives. Services include transportation and infrastructure, housing and economic development, as well as parks and recreation programs. These vital services play a pivotal role in enriching City neighborhoods and improving the overall quality of life for City residents.

Addressing community development needs is also a high-level priority for the City of Miami. The City works to stimulate neighborhood development through strategic implementation of its programs and services. For example, the City uses its resources to provide employment training as well as services to the disabled, elderly, youth, and children.

Listed below are some of the other vital services provided by various City Departments:

Department of Housing and Community Development (“HCD”)

The Department of Housing and Community Development provides a wide range of important services. Some of those services include elderly meals, childcare, programs for youth and the disabled, and housing assistance and economic development programs.

Many of the City’s elderly depend on daily meals from these programs to survive. Working parents rely on child and youth programs within safe environments that provide educational and recreational activities. Housing programs mainly provide affordable housing by either reducing the rent of units and/or providing direct rental assistance where low-income participants would not be cost-burdened by the high cost of housing in Miami. These programs are of great need and importance especially to low-to-moderate income households.

HCD also works in conjunction with various other City Departments to provide a multitude of other services such as: supporting local business development, providing financial assistance for new home construction and rehabilitation, providing homeless outreach services, and improving public parks and infrastructure.

Department of Resilience and Public Works (“RPW”)

RPW offers a free public transportation through its Trolley service. The service is comprised of approximately 54 City-owned Trolleys with 13 existing routes, covering 122 miles, while providing connections to approximately 53 Miami-Dade County MetroBus routes, 11 MetroRail Transit hubs, and connections to the municipal trolley networks of Coral Gables and West Miami. The City’s Trolley network primarily serves to augment the existing regional transit system provided by Miami-Dade County.

Since the program’s launch in early 2012, the City’s system has experienced steady ridership growth. In 2019, the City served close to 5.4 million riders, averaging approximately 400,000+ riders per month and over 10,000 daily riders of all ethnicities and backgrounds.

Office of Capital Improvements (“OCI”)

OCI provides projects that have a significant impact in the community. OCI delivers resilient, sustainable and innovative facilities and infrastructure through the construction and improvement of roadway milling and resurfacing, flood mitigation, drainage improvements, public parks, playgrounds, community centers, aquatic facilities, athletic fields, seawalls, marinas, boat ramps, kayak launches, restroom facilities, arts and cultural facilities, municipal and maintenance facilities, as well as environmental remediation, cleanup and reconstruction of public areas and the construction of public safety facilities. All of these projects bring improvements to the City of Miami and help improve the quality of life for residents and businesses.

Factor 4. The resources available and overall costs:

The City regularly provides information in English, Spanish, and Haitian-Creole. Information regarding essential programs, services, and activities are provided on the City’s website and in City facilities open to the public. Residents can also request translations of documents into Spanish or Creole. A large portion of the City’s employees are bilingual, which facilitates communication with LEP individuals. The City regularly disseminates information via its website, www.miamigov.com, and its television station, Channel 77.

The various offices of the City have employees dedicated to community outreach and engagement who create all materials originally in English, then translates them in-house into Spanish for Districts 1, 3 and 4. It shares the information only in English with District 2 residents, and for specific projects in District 5, it seeks the assistance of staff from the NET Office for translation of brief project materials into Creole. Additionally, the City outsources translation services from a list of qualified agencies, when needed.

The following guidelines are used to assist persons with limited English proficiency:

- a. Meetings, hearings and other public involvement events include bilingual interpreters for oral and written information, as appropriate.
- b. The City’s Title VI/Nondiscrimination Policy and Complaint Procedures is posted within all Trolley vehicles in English, Spanish, and Creole (see sample LAP Image 1 below). The information is hosted on the City’s web page in English and Spanish and may be made available in other languages, as requested.

SAMPLE IMAGE 1 – TITLE VI Policy On-Board Miami Trolley Vehicles



5. Language Assistance Services

The City of Miami provides language assistance (such as qualified interpreters or staff whose proficiency in non-English languages has been documented), in both face-to-face and telephone encounters that address the needs. Language assistance may be provided through a variety of means, including qualified bilingual and multilingual staff or contracted interpreters.

The City of Miami ensures that the interpreters are qualified to provide the service and understand interpreter ethics and client confidentiality needs. A list of qualified vendors is available upon request.

The Language Assistance Plan includes department oversight/responsibilities interpretation/translation services for LEP; training of staff; providing notice to LEP individuals, instituting a complaint process as well as monitoring and updating the plan and strategies to communicate the contents of the plan.

Additionally, the City does outreach to promote programs and services. The main form of outreach to the public has always been the public hearings, whereby all residents, developers, public service agencies, housing associations, economic development providers, clients, and other City Departments are invited via a printed advertisement in The Miami Herald, multiple e-mail blasts, and printed flyers mailed out to all agencies. At these hearings, surveys are made available to all those in attendance to further address their district's needs, and the same survey is posted on the department's website for digital submission.

Email blasts are sent to hundreds of community institution and individuals to promote the public hearings. Information flyers detailing the event or programs are also posted in public areas.

Targeted Outreach further includes making information available on departments' main web page, social media, and non-English Speaking (Spanish, Creole) media.

6. Procedures for providing language services

a. Having bilingual/multilingual staff available.

- Anyone in need of assistance may contact the operating department directly to request assistance with a particular service or program.
- Interpretation will be provided in the primary language of the individual. This includes sign language for persons who are deaf or hard of hearing.

b. In-person Interpreters

- The City works with vendors who are professionally trained to provide translation and interpreting services – including sign language, if and when needed.

c. Translation of vital documents

- The City will make available vital forms and materials in the most frequently encountered languages (Spanish & Creole). These include outreach materials, public service announcements, etc.

- For other languages, staff will use an interpreter to translate the document into the LEP individuals' primary language.
- Written communication to the LEP individual(s) shall be translated into the primary language of the LEP individual.

d. **Notice of Language Services**

- Signage is placed in visible City locations notifying individuals of the right to request an interpreter at no cost to the individual. Signage is translated into Spanish and Haitian-Creole by the City of Miami. Examples include on City trolley's.+

7. Prohibition against using children as interpreters

Staff are prohibited from using minors to interpret, absent emergency circumstances. Customers shall be advised of client's right to an interpreter at no cost to the client.

8. Staff Training

Staff will receive training on an annual basis covering the topics such as the following: the content of the language access policy; how to identify the need for language access services; working with LEP individuals; providing language accessible service in a culturally sensitive manner; working with an interpreter and interpretation best practices.

9. Monitoring and self-assessment

The City will review and update, this Language Assistance Plan in order to ensure responsiveness to community's needs and compliance with Title VI of the Civil Rights Act of 1964. LEP persons are entitled to language assistance with respect to services and benefits. The Title VI coordinator is responsible for monitoring compliance with the language access plan.

The City collects and maintains information on language usage and needs, including primary language of customers; use of language interpretation services; distribution of translated documents; frequency of contact with LEP individuals seeking services; and referrals of LEP individuals.

10. Complaint & Grievance Process

This plan advises LEP individuals of their right to language access services, which includes information of our complaint process, in the event service or benefits are denied or they believe their rights have been violated. The below outlines the complaint procedures:

- a. A complaint regarding the denial of language accessible services or regarding the quality of language accessible services – including interpreters or translated materials – may be made in person or in writing to the Office of Equal Opportunity and Diversity Programs (EODP), Attention: Title VI Coordinator.
- b. The complaint should specify the date, individuals involved, and the nature of the client's grievance.
- c. All complaints will be directed to the Title VI Coordinator.

- d. The Title VI Coordinator will investigate and notify the parties of the results of the investigations within 30 days upon receipt of the complaint.

11. Responsibilities

Each City department providing federal programs, services, or projects will have a designated LAP coordinator who will be responsible for advising participants of the City's LEP/LAP provisions. Materials will be posted in conspicuous areas where staff and persons with limited English proficiency interact. These would include reception areas and other open spaces. Details concerning how to access programs and services are available on the City website and in public areas like building entrances, trolleys, and program meeting areas.

LAP coordinators will ensure that anyone requesting language assistance receives interpretation or translation in the language preferred from the list of approved agencies at no charge.

In the event participants do not receive the proper assistance or they feel the assistance was not satisfactory, they may file a complaint with the City's Title VI Coordinator/EDOP Administrator. The complaint form is available on the website at www.miamigov.com/EODP. Complaints may be filed electronically by e-mail or in person at the Office of EODP. The Title VI Coordinator will review the complaint and conduct an investigation into the matter as outlined in the Grievance Process section.

12. Resources

www.LEP.gov

Complaint Form

List of professional Interpreters and Translators

The City has available a list of qualified vendors from which to select as the need for interpretation and translation arises for meetings, events, etc. (See attached)

13. Forms



**LANGUAGE ASSISTANCE PLAN (LAP)
Complaint Form**

Section I

Name: _____

Home Address (Street No., City, State, Zip code):

Telephone: _____

Electronic Mail Address: _____

Section II

Are you filing this complaint on your own behalf? Yes _____ No _____

(If you answered "yes" to this question, please go to Section III)

If you answered "no," please supply the name and contact information of the person for whom you are complaining and please also explain why you are complaining on that person's behalf:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes _____ No _____

Section III

Date of Alleged Incident (Month / Day / Year): _____ / _____ / _____

Explain as clearly as possible what happened and why you believe you were unable to access a program, service, or activity of the City of Miami due to a language barrier. Describe the type of program or service you were unable to access and include the name and contact information of the person(s) who were involved. If more space is needed, please use the back of this form or additional pages.

Section IV

Have you previously filed an LAP complaint with the City? Yes ____ No ____
If yes, please provide the date, nature, and outcome of your prior complaint:

Signature: _____

Date: _____

Please submit this form via email to equalopportunityanddiversity@miamigov.com , or mail this form to:
Office of Equal Opportunity and Diversity Programs
444 SW 2nd Ave, Suite 642
Miami, FL 33130



Waiver of Right to Free Interpreter/Translator Services

I, _____ (First name Last name) have been informed of my right to receive free Interpreter/translator services from _____ (Department Name). I understand that I am entitled to these services at no cost to myself or other family members.

I am choosing either to: **(A)** Use my own interpreter/translator or **(B)** Waive City interpreter/ translator services (Please circle either A or B. Do not circle both). If you choose A, please provide the name of the person you have chosen to interpret or translate for you: _____ (Name of Person Acting as Interpreter/Translator).

The person I am using to act as my interpreter/translator is 18 years of age or older.

I understand I can withdraw this waiver at any time and request the services of an interpreter or translator, which will be paid for by the City of Miami. I understand that withdrawal of this waiver must be in writing and submitted to the City of Miami.

My signature below verifies that I waive my rights to an interpreter/translator and I understand this waiver will be effective until such time as I revoke it in writing or one (1) year from the date signed, whichever is earlier.

Signature of person making waiver

Date

Name of Chosen Interpreter (print)

Date

Signature of Chosen Interpreter

Date