

**CITY OF LAKELAND, FLORIDA**  
**LIMITED ENGLISH PROFICIENCY PLAN**  
**October 2023**

**INTRODUCTION:**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, and its implementing regulations, provide that no person shall be subjected to discrimination on the basis of race, color or national origin.

Likewise, Executive Order 13166 entitled "Improving Access to Services for Persons with Limited English Proficiency," which was endorsed August 11, 2000, establishes that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination and federal agencies, as well as their benefactors, are obligated to take steps to ensure such discrimination does not occur.

As a recipient of federal funds, the City of Lakeland, Florida is expected to, and will, take reasonable steps to ensure persons with Limited English Proficiency (LEP) skills have meaningful access and an equal opportunity to participate in City provided services, activities, and programs.

**POLICY STATEMENT:**

It is the City's policy that:

- No person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity because of race, color, national origin, sex, age, disability, marital or religious status or any other status protected by law.
  
- Regardless of race, color, religion, sex, national origin, marital or religious status, or disability, all persons will be afforded equal opportunity to access and use City programs and services, as well as participate in City activities and events.
  
- LEP persons will be afforded meaningful communication, oral or written, regarding public-provided services, programs and activities, so program activity as well as service access and participation is not hindered and the potential for national origin discrimination is minimized or eliminated in its entirety. Moreover, where and when required, communication aids will be provided without cost to the LEP person(s) being served.

## **LEP PERSONS WHO MAY BE SERVED:**

The U.S. Census Bureau American Fact Finder 2021 American Community Survey 5-Year Estimates (*Refer to "Exhibit 4"*) \* reveal that of 104,380 persons (population 5 years and older) in the City of Lakeland, 82.4% speak only English. Whereas, 17.5% of the population speak a language other than English. The non-English languages spoken include:

- Spanish – 12.9% or 13,541 people
- Other Indo-European Languages – 1.1% or 1,122 people
- Asian and Pacific Island Languages – 0.1% or 741 people
- Other Languages – 0.5% or 525 people

Among the 13,541 people who speak a language other than English 5.6% speak English less than very well. This data indicates 5.6% of the people in the City's service area are LEP and could seek to encounter or participate in a City program, activity, or service.

\*Note: The United States Census Bureau did not release its standard 2020 ACS 1-year estimates because of the impacts of the COVID-19 pandemic. Instead, the United States Census Bureau released experimental estimates from the 1-year data. They are posted on the 2020 ACS 1-Year Experimental Data Release page. This data will not be released on data.census.gov.

## **FREQUENCY OF LEP PERSONS CONTACT:**

Because of the diverseness of City programs, activities, and services, it is difficult to establish, with certainty, the frequency of LEP person contact; the frequency of contact could be never, sporadic, or daily. It is reasonable to glean from the area statistics, however, that the frequency of contact could be 5.6% of the time City programs, activities, and services are available to the public.

A polling of City departments confirms LEP person contacts in the majority of City areas of operation have been sporadic and dealt with via the use of bilingual staff to interpret.

## **LANGUAGE ASSISTANCE:**

### **Oral Communications**

The City will endeavor to promptly identify language and communication needs of LEP persons. Language posters and identification cards will be utilized. For example, "I Speak Cards" are available online at [www.lep.gov](http://www.lep.gov). These will be used as necessary to determine the language of the LEP individual (*Refer to "Exhibit 1"*).

Once the language is identified, assistance will then be provided to LEP persons through use of competent bilingual staff or qualified interpreters.

The City will maintain an accurate and current list of bilingual or multi-lingual staff, their name, language spoken, and hours of availability (*Refer to "Exhibit 2"*). If an interpreter is needed and no notice has been given from the LEP person, or there is no request for professional interpreting services, an employee who speaks the relevant language and is qualified to interpret will be called upon.

If a staff member is unable or unavailable to interpret, or a request is made for professional interpreting services, upon receiving notice to this effect, the LEP Plan Maintainer will arrange for an external interpreter to render aid either in person or via telephone or technology. The LEP Plan Maintainer will maintain a list of external qualified interpretation service providers.

The City acknowledges that some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and only after the City has offered the LEP person an interpreter at no charge.

To ensure confidentiality of information and the accuracy of communications, children or other customers will not be used to interpret. Staff will not be used to interpret legal proceedings.

### **Written Translations**

When translation of vital City documents is needed, an approved copy of the document in final form is to be submitted to the LEP Plan Maintainer who will contact a qualified translation service and arrange for the document translation as soon as practical. There will be no charge to LEP persons for any City document translation that may be requested or required.

Additionally, over a period of time, the City will endeavor to provide vital City documents in one or more alternative languages, and ensure the translated documents are readily accessible in varied City facilities and posted on the City's website, if and where appropriate.

## **Documentation**

City staff who encounter and aid LEP persons are instructed to document the experience using the form attached hereto. *(Refer to "Exhibit 3")*. The completed form is to be remitted to the LEP Plan Maintainer for use in identifying customer needs and accommodations, as well as updating this LEP Plan when necessary.

### **NOTICE OF LANGUAGE ASSISTANCE:**

The City will inform LEP persons of the availability of language assistance by posting a notice in intake areas and other points of entry to City facilities, and a link to Title VI of the Civil Rights Act of 1964, Executive Order 13166, and this LEP plan will be included on the City's website, [www.lakelandgov.net](http://www.lakelandgov.net).

Notification will also be provided through one or more of the following: outreach documents, telephone voice mail menus, local media outlets, and/or community-based organizations.

### **STAFF TRAINING:**

A copy of this LEP Plan will be presented to all City employees. Thereafter, those who have direct contact with LEP individuals will be trained in:

- Understanding Title VI of the Civil Rights Act of 1964
- Application of the City's LEP Policy Statement and Plan
- Language assistance expectations and use of "I Speak Cards"
- Documentation and reporting of language assistance requests
- Handling a potential Title VI or LEP complaint

### **UPDATING THE LEP PLAN:**

The City will regularly assess the efficacy of these procedures, including, but not limited to, mechanisms for securing interpreter services, means of delivery of language assistance, feedback from others, and complaints filed by LEP persons. When changes in demographics, services, or other needs are evident, the LEP Plan will be updated.

At a minimum, the LEP Plan will be reviewed and updated when new U.S. Census data is available, or when it is clear that a higher concentration of LEP individuals are present in the City service area. Updates to the Plan may include the number of documented LEP encounters per year; service area current LEP population and demographics; language assistance changes, and the number of complaints received and resolved.

**LEP PLAN MAINTAINER:**

For questions or comments regarding this LEP Plan; requests for language assistance, or to file a complaint alleging an LEP need has not been met, contact:

Kristin Meador, ADA Specialist  
City of Lakeland, City Hall  
Public Works Department - Director's Office  
228 S. Massachusetts Avenue  
Lakeland, FL 33801-5086  
Phone: (863) 834-8444  
Email: [kristin.meador@lakelandgov.net](mailto:kristin.meador@lakelandgov.net)

**LEP PLAN PREPARER:**

  
\_\_\_\_\_  
Greg James, Public Works Assistant Director 10/10/2023  
Date

**LEP PLAN APPROVED BY:**

  
\_\_\_\_\_  
Shawn Sherrouse, City Manager 10/17/23  
Date

**Title VI Coordinator:**

  
\_\_\_\_\_  
Emily Colón, Deputy City Manager 10 OCT 2023  
Date

**LEP PLAN Maintainer:**

  
\_\_\_\_\_  
Kristin Meador, ADA Specialist 10-10-23  
Date

Distribution:

- All City of Lakeland Department Directors and Assistant Department Directors
- City Attorneys
- City Clerk
- Communications Department
- Emily Colón, Deputy City Manager and Title VI/Nondiscrimination Coordinator
- Mark Farrington, Director of Human Resources – HR Policy and Labor Relations
- Kristin Meador, ADA Specialist

City of Lakeland, Florida  
*Updated: 10/6/2023*

# "Exhibit 1"

## Sample "I Speak Cards"

2004 Census Test	United States Census 2010 LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p>	1. Arabic
<input type="checkbox"/> <p>Խոսողո՞ւմ ե՞նք նշո՞ւմ կատարե՞ք այս քանակազուտում, եթե խոսո՞ւմ կա՞մ կարողո՞ւմ ե՞ք հայերեն:</p>	2. Armenian
<input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p>	3. Bengali
<input type="checkbox"/> <p>ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p>	4. Cambodian
<input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p>	5. Chamorro
<input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p>	6. Simplified Chinese
<input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p>	7. Traditional Chinese
<input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p>	8. Croatian
<input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p>	9. Czech
<input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p>	10. Dutch
<input type="checkbox"/> <p>Mark this box if you read or speak English.</p>	11. English
<input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p>	12. Farsi

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<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องสี่เหลี่ยมที่พูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אדיש.	38. Yiddish

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**"Exhibit 2"**

**City of Lakeland Multi-Lingual Staff List 2023**

City of Lakeland Multi-Lingual Staff List 2023					
Language(s) Spoken	Employee Name	Department	Contact Information	Hours of Availability	Notes
<b>ARABIC</b>					
<b>BOSNIAN</b>	Alexander Coralic	LPD	834-6966	6:30 PM -6:30 AM	days vary, hours set
<b>CANTONESE</b>					
<b>CHINESE</b>	Liusha Li	DoIT Info. Tech.	834-6680	M-F 8-5 pm	
<b>CREOLE</b>	SEE Haitian Creole				
<b>CROATIAN</b>	Alexander Coralic	LPD	834-6966	6:30 PM -6:30 AM	days vary, hours set
<b>FRENCH</b>	Michael Renard	LE Engineering	834-6423	M-Th 6-4:30 pm	
<b>GUJARATI</b>	Asha Patel	Finance	834-8357	M-F 8-5 pm	
<b>GUJARATI</b>	Mahen Pete	PWD Engineering	834-8442	M-F	hours vary
<b>GERMAN</b>	Mathias Riesner	Water Engineering	834-6446	M-Th 6:30-3:30 pm	Fri 10:30-2:30 pm
<b>GERMAN</b>	Naomi Tillett	LE T&D Engineering	834-6410	M-F hours vary	not fluent
<b>GERMAN</b>	Gina Jacobi	LE Admin.	834-8343	M-F 8-5 pm	not fluent
<b>HAITIAN/CREOLE</b>	Paul Tilus	Water Utility Chemist	834-8223	M-F 8-3 pm	
<b>HAITIAN/CREOLE</b>	Earl Morse	Finance	834-6275	M-F 7:30-4:00 pm	
<b>HAITIAN/CREOLE</b>	Michael Renard	LE Engineering	834-6423	M-Th 6-4:30 pm	
<b>HEBREW</b>					
<b>HINDI</b>	Afifa Mahmood	PWD/Facilities	834-2352	M-F 7-4 pm	
<b>HINDI</b>	Asha Patel	Finance	834-8357	M-F 8-5 pm	
<b>HINDI</b>	Mahen Pete	PWD Engineering	834-8442	M-F	hours vary
<b>HINDI</b>	Shankar Karki	LE Production/Power	834-6612	M-F 8-3 pm	
<b>HMONG</b>	Sao Yang	PWD Facilities	834-2322	M-F 7-4 pm	cell: 863-333-2647
<b>INDONESIAN</b>					
<b>ITALIAN</b>					
<b>JAPANESE</b>					
<b>JAVA</b>					
<b>KOREAN</b>					
<b>MALTESE</b>	Shirley Camilleri	LE Mac. Pow. Plant	834-6661	M-F 7-3:30 pm	not fluent
<b>MANDARIN</b>					
<b>MARATHI</b>	Asha Patel	Finance	834-8357	M-F 8-5 pm	
<b>MONTENEGRIN</b>	Alexander Coralic	LPD	834-6966	6:30 PM -6:30 am	days vary, hours set

<b>NAPALESE</b>	Shankar Karki	LE Production/Power	834-6612	M-F 8-3 pm	
<b>PORTUGESE</b>	Nicole Barber	Water Utilities	834-3568	M-F 7:30-4 pm	not fluent
<b>PUNJABI</b>	Afifa Mahmood	PWD/Facilities	834-2352	M-F 7-4 pm	
<b>RUSSIAN</b>					
<b>SERBIAN</b>	Alexander Coralic	LPD	834-6966	6:30 PM -6:30 am	days vary, hours set
<b>SIGN LANG. ASL</b>	Christy Loughlin	Comm/Econ. Dev.	834-5099	M-F 8-5 pm	proficient - not certified
<b>SPANISH</b>	Sandy Childers	LE Fiscal Opps	834-6749	M-Th 6-4:30 pm	
<b>SPANISH</b>	Fi Hall	PWD Facilities	834-2342	M-F 7-4 pm	
<b>SPANISH</b>	Carlos Caraballo	IT Security/LE EMS	834-6043	M-Th 7-5 pm	
<b>SPANISH</b>	Angie Ellis	LPD Comm. Serv.	834-6960	M-F 8-5 pm	
<b>SPANISH</b>	Gina Jacobi	LE	834-8343	M-F 8-5 pm	
<b>SPANISH</b>	"Mimi" Orozco-Gonzalez	Attorney's Office	834-6002	M-F 8-5 pm	
<b>SPANISH</b>	Diana Rivera	LE - T&D Engineering	834-8878	Tues-Fri 5:30-4 pm	
<b>SPANISH</b>	Yermie Santiago	Water Utilities	834-8325	M-F 9-5 pm	
<b>SPANISH</b>	Naomi Tillett	LE T&D Engineering	834-6410	M-F hours vary	
<b>SPANISH</b>	Maria Boothby	CED Bus. Tax Office	834-6225	M-F 8-5 pm	
<b>SPANISH</b>	Nicole Barber	Water Utilities	834-3568	M-F 7:30-4 pm	
<b>SPANISH</b>	Susana Aviles	LPD	834-8984	M-F 8-5 pm	
<b>URDU</b>	Afifa Mahmood	PWD/Facilities	834-2352	M-F 7-4 pm	
<b>TAIWANESE</b>					
<b>VIETNAMESE</b>	Phuong Tran	LE	834-4648	M-F 8-5 pm	

**"Exhibit 3"**  
**City of Lakeland**  
**Limited English Proficiency Encounter Record**

**Department:** \_\_\_\_\_

**Division:** \_\_\_\_\_

Date of Encounter	Nature of Encounter	LEP Person Language Spoken	Action Taken to Meet LEP Person's Need

**"Exhibit 4"**

**U.S. Census Bureau  
American Community Survey  
2021 ACS 5-Year Estimates Data Profile  
Link: <https://www.census.gov/>  
Lakeland, FL**

LANGUAGE SPOKEN AT HOME	# of individuals	Percentage
Population 5 years and over	104,380	
Speak only English	86,059	82.4%
Speak a language other than English	18,321	17.5%
Speak English less than "very well"	5,912*	5.6%
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>		
Spanish	13,541	12.9% of total pop 38.7% of Spanish speakers
Speak English less than "very well"	5,245*	1.1% of total pop 28.6% of Indo-Euro Languages
Other Indo-European languages	1,122	0.1% of total pop 41.4% of Asian/PI languages
Speak English less than "very well"	322*	0.5% of total pop 73% of Other
Asian and Pacific Island Languages	741	
Speak English less than "very well"	307*	
Other Languages	525	
Speak English less than "very well"	38*	