

**City of Santa Ana  
Public Works Agency  
Title VI Program Plan**



**March 17, 2025**

## Table of Contents

<b>Title VI Non-Discrimination Statement .....</b>	<b>3</b>
<b>Introduction.....</b>	<b>4</b>
<b>Title VI Coordinator.....</b>	<b>5</b>
<b>Title VI Implementation.....</b>	<b>6</b>
Title VI Complaint Procedures.....	6
Notice of Rights .....	6
Public Participation Plan .....	7
Limited English Proficiency Plan .....	7
Training.....	7
Environmental Justice in Minority and Low-Income Populations .....	8
Data Collection .....	8
Annual Work Plan .....	8
<b>Appendices .....</b>	<b>9</b>
<b>Appendix A</b> Notice to the Public	
<b>Appendix B</b> Complaint Form	
<b>Appendix C</b> Public Participation Plan	
<b>Appendix D</b> Limited English Proficiency Plan	

## TITLE VI NON-DISCRIMINATION STATEMENT

It is the policy of the City of Santa Ana Public Works Agency that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Public Works as provided by Title VI of the Civil Rights Act of 1964 and related statutes.



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## INTRODUCTION

The Public Works Agency of the City of Santa Ana (Public Works or Department), with five divisions and professional staff of more than 330 employees, is responsible for maintaining Santa Ana's infrastructure and quality of life. We build and maintain all public streets, storm drains, sewers, and water facilities, as well as coordinate trash collection and recycling, street sweeping, public right-of-way landscaping and graffiti removal. Through our Water Resources Division, we ensure the community enjoys high quality drinking water. We also ensure the community is able to travel around the city efficiently through the use of our state-of-the-art traffic management system and close collaboration with neighborhood associations and developers to resolve speeding, parking and traffic problems.

Public Works receives funding from the Federal Highway Administration (FHWA). As a recipient of such Federal-aid, the Department is required to comply with Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 forbids discrimination against anyone in the United States because of race, color, or national origin by any program receiving Federal-aid. Subsequently, various other statutes, including the Federal-Aid Highway Act of 1973, added prohibitions against discrimination based on sex, age, disability, or socioeconomic status. The Civil Rights Restoration Act of 1987 defines the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

Public Works is committed to ensuring that none of its activities or programs treats any part of the community differently than any other part. Public Works expects every manager, supervisor, employee, contractor and vendor sub-recipient of Federal-aid funds to be aware of and apply the intent of Title VI of the Civil Rights Act of 1964 and related statutes in performing assigned duties.

Federal statutes require recipients of Federal-aid programs to prepare and implement a program to clarify roles, responsibilities, and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964.

The City of Santa Ana's Title VI Program Plan provides the policy direction necessary to ensure compliance with Title VI of the Civil Rights Act of 1964.

## **TITLE VI COORDINATOR**

The Public Works Title VI Coordinator is responsible for the overall Title VI program implementation, and performs the lead role in the development and implementation of the Title VI program and coordinating compliance across each division within Public Works. The Title VI Coordinator provides guidance and technical assistance on Title VI matters and has overall program responsibility for preparing required reports for compliance and developing program procedures, which include:

- Submitting a Title VI plan and annual reports on the agency's behalf
- Developing procedures for the prompt processing and disposition of complaints
- Investigating complaints, compiling a complaint log, and reporting to CDOT
- Developing procedures for the collection and analysis of statistical data
- Developing a program to conduct Title VI reviews of program areas
- Conducting annual Title VI assessments of pertinent program areas
- Developing Title VI information for dissemination
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary

## TITLE VI IMPLEMENTATION

### Title VI Complaint Procedures

Any person who believes they have been discriminated against based on race, color, or national origin by Public Works or a sub-recipient may file a Title VI complaint by completing and submitting the Department's Title VI Complaint Form. Any such complaint must be filed in writing with the Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory action.

Complaint forms are available online at <https://www.santa-ana.org/>. An example of the complaint form is included under Appendix B. Complaints must be filed in writing and should be directed to:

City of Santa Ana Public Works Agency  
Title VI Coordinator  
20 Civic Center Plaza M-21, Santa Ana, CA 92701  
Website: <https://www.santa-ana.org/>

The Title VI Coordinator will adhere to the following procedures to investigate Title VI complaints:

- 1) The complaint must meet the following requirements to undergo a Title VI investigation:
  - a. Complaint shall be in writing and signed by the complainant(s).
  - b. Include the date of the alleged act of discrimination, date when the complainant became aware of the alleged discrimination, date on which the conduct was discontinued, and the latest instance of conduct.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties to the discriminatory activity.
  - d. Complaints must be filed within 180 calendar days of the alleged incident in compliance with applicable law.
- 2) Within 14 business days of receiving the complaint, Public Works Title VI Coordinator will determine jurisdiction, sufficiency, and any need for additional information.
- 3) The Title VI Coordinator will create and manage a log of all Title VI complaints.
- 4) Within 90 calendar days of receipt of the complaint or requested additional information, the Title VI Coordinator will issue either: 1) a closure letter or 2) a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint will be closed. A Letter of Finding summarizes the allegations, and informs the complainant that Public Works found the complaint to have merit and it will take appropriate corrective action to remedy the matter and will forward the complaint to Caltrans.

### Notice of Rights

Public Works displays the 'Notice of Rights' for public view on the Public Works website. The

notice states that Public Works is committed to complying with Title VI and to ensuring that no person be excluded from the participation in, be denied the benefits of or be otherwise subjected to discrimination under any of our programs, activities, or services.

Example of Public Works' Notice to the Public is under Appendix A.

### **Public Participation Plan**

Public Works will solicit and consider all opinions from city residents and stakeholders to ensure that projects, programs, and services delivered by the Department are sensitive to the various demographic backgrounds within the region. Public Works has prepared a Public Participation Plan (PPP) for use by any division to promote public involvement in the planning and decision-making process of projects, programs, and services. The PPP is included under Appendix C

### **Limited English Proficiency Plan**

Public Works has developed a general Limited English Proficiency (LEP) Plan for use by any division to address the public's language needs. The LEP Plan outlines how to take reasonable steps for providing language assistance to LEP persons who wish to access services provided by Public Works. The LEP Plan identifies the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The LEP Plan is included under Appendix D.

To prepare the LEP Plan, the Department referenced the U S Department of Transportation's four-factor LEP analysis, and has considered the following factors:

- 1) Number and proportion of LEP persons served or encountered in the eligible service population
- 2) Frequency with which LEP persons come in contact with Public Works programs, activities or services
- 3) Nature and importance of services provided by Public Works to the LEP population
- 4) Resources available to Public Works and overall cost to provide LEP assistance

### **Training**

Public Works is providing Title VI training to all employees in the Department. Employees will receive this training at minimum every two years. Trainings are offered online or through an instructor-led class. The following components are covered to ensure compliance:

- 1) Review of Public Works' Title VI Policy, PPP and LEP Plans
- 2) Types of language assistance services offered to the public
- 3) How to handle a potential complaint
- 4) Where to seek assistance for Title VI questions and concerns
- 5) Some employees will be provided training on DBE and Americans with Disabilities Act compliance, as necessary

## **Environmental Justice in Minority and Low-Income Populations**

In accordance with Executive Order 12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"), Public Works will identify and address the environmental effects of programs, policies, and activities on minority and low-income populations. Public Works will consider demographic data during project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public's input and demographic data analysis will enable Public Works to develop measures to mitigate any potential adverse effects on minority and low-income populations. Environmental Justice compliance will utilize the PPP as attached in Appendix C

## **Data Collection**

Public Works will gather, analyze, and maintain statistical data on race, color, national origin, sex, age, and disability of participants in, and beneficiaries of, the County's Federal-aid programs. Data gathering procedures will be reviewed and analyzed regularly to ensure the effectiveness of outreach methods in meeting the objectives of the Title VI program to ensure that no group is intentionally excluded in the decision-making process or is not given the opportunity to voice their opinions or concerns.

## **Annual Work Plan**

Public Works will develop an annual report of Title VI accomplishments and upcoming goals, including an update to the Title VI Program that reflects organizational policy changes, and a Work Plan outlining Title VI monitoring and review activities planned for the upcoming fiscal year.



## APPENDIX A



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# NOTICE TO PUBLIC

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## **CITY OF SANTA ANA RIGHTS UNDER TITLE VI**

The City of Santa Ana 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."

For additional information on the City of Santa Ana's nondiscrimination obligations, please contact the Public Works Title VI Coordinator by mail using the information below:

Title VI Coordinator  
City of Santa Ana  
20 Civic Center Plaza, M-21  
Santa Ana, CA 92701

If you believe you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under this City of Santa Ana program, you may file an official Title VI complaint with the Title VI Coordinator. We require 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 by contacting the person above.

## APPENDIX B



### **CITY OF SANTA ANA TITLE VI COMPLAINT FORM**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of **race, color or national origin** in programs and activities receiving Federal financial assistance. 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 the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Title VI guarantees fair treatment for all people and provides for the City of Santa Ana, to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the programs, services, and information the City of Santa Ana provides.

#### **SECTION I**

Name \_\_\_\_\_  
Mailing Address \_\_\_\_\_  
Telephone Number (Home) \_\_\_\_\_ (Cell) \_\_\_\_\_  
E-Mail Address \_\_\_\_\_

#### **SECTION II**

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

\*If you answered "yes" to this question, proceed to Section III

If not, please provide the name and relationship of the person for who you are complaining:

Please explain why you are filing for a third party: \_\_\_\_\_

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

**CITY OF SANTA ANA  
TITLE VI COMPLAINT FORM**

**SECTION III**

List type of discrimination you experienced: (check all that apply)

Race ( ) Color ( ) National Origin ( ) Other \_\_\_\_\_

Please indicate your race or color, if it is the basis of your complaint \_\_\_\_\_

Please describe your national origin, if it is a basis of your complaint \_\_\_\_\_

Location where alleged discrimination occurred \_\_\_\_\_

Time and date of alleged discrimination \_\_\_\_\_

Name/Position title of the person who allegedly subjected you to Title VI discrimination: \_\_\_\_\_

Please explain in as much detail what happened and how you were discriminated against. Include specific details and any other information that will assist in the investigation of your allegations. Provide any other documentation that is relevant to this complaint.

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Please list any persons, witness, if known, whom we may contact for additional information to support or clarify your complaint. Provide name, address and/or telephone number.

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**SECTION IV**

Have you previously filed a Title VI with this agency? \_\_\_\_\_ Yes \_\_\_\_\_ No

Have you filed this complaint with another other Federal, State or local agency, or with any Federal/State court? \_\_\_\_\_ Yes \_\_\_\_\_ No

If you answered "Yes", please provide the following:

Federal Agency: \_\_\_\_\_ Date: \_\_\_\_\_

Federal Court: \_\_\_\_\_ Date: \_\_\_\_\_

State Agency: \_\_\_\_\_ Date: \_\_\_\_\_

State Court: \_\_\_\_\_ Date: \_\_\_\_\_

Local Agency: \_\_\_\_\_ Date: \_\_\_\_\_

**CITY OF SANTA ANA  
TITLE VI COMPLAINT FORM**

**SECTION V**

What remedy are you seeking for the alleged discrimination?

\_\_\_\_\_

How did you learn that you could file this complaint?

\_\_\_\_\_

**SECTION VI**

By signing below, I confirm that the information on this form is true and to the best of my knowledge.

Signature\_\_\_\_\_ Date\_\_\_\_\_

Printed Name\_\_\_\_\_

Submit this completed form to: Public Works Agency, Title VI Coordinator, City of Santa Ana, 20 Civic Center Plaza, M-21, Santa Ana, CA 92701.

## APPENDIX C



### **CITY OF SANTA ANA TITLE VI PUBLIC PARTICIPATION PLAN**

#### **PURPOSE**

The City of Santa Ana'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 provide guidelines for involving the public to ensure that all groups are represented and their needs considered. Public Works is committed to ensuring it serves the residents and businesses of the City fairly, consistently, and in the most cost-efficient and appropriate manner within available resources.

#### **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 what non-English languages and other cultural barriers exist to public participation within the Santa Ana area.
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 organization and businesses.

**General Citizens:** There are 324,538 residents in the Santa Ana area (U.S. Census, 2010). Around 78.2 percent are persons of Hispanic or Latino origin. 46 percent of the population consider themselves to be White; 10.5 percent reported as Asian; 1.5 percent is Black persons;

## **CITY OF SANTA ANA**

### **TITLE VI PUBLIC PARTICIPATION PLAN**

and 1 percent is American Indian and Alaska Native persons. 82 percent indicated they spoke a language other than English at home.

**Low-income:** Low-income households (below poverty level) account for 18% of all households in Santa Ana and should be given every reasonable opportunity to provide input on Public Works projects.

**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, Public works projects are of critical concern to private sector organizations. 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 will use to actively solicit public input in the planning process of a project.

##### *Newsletters:*

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, so that it is able to accommodate disabled users.

##### *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.

## **CITY OF SANTA ANA**

### **TITLE VI PUBLIC PARTICIPATION PLAN**

#### *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.

#### **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 of 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 contacts mentioned earlier in this document, notification of contacts is available in English, Spanish and Vietnamese languages.

## **APPENDIX D**



### **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

#### **PURPOSE**

To establish guidance for the City of Santa Ana 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 Santa Ana'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.

#### **REFERENCES**

- 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)

#### **BACKGROUND**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing



## **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY PLAN**

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.

### **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 and Vietnamese are the two most requested languages for interpreters in the City of Santa Ana. 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.

### **FOUR FACTOR ANALYSIS**

The DOT Four Factor Analysis provides guidance to agencies receiving federal financial assistance in taking reasonable steps to ensure meaningful access to all of its services, programs and activities used by LEP persons.

## **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY PLAN**

In order to prepare this plan, the City of Santa Ana undertook an analysis that considers the following factors:

The number or proportion of LEP persons in the service area who may be served by Public Works. City staff reviewed the 2010 U.S. Census to determine the approximate number of LEP persons age 5 years and older in the City of Santa Ana.

<b>RACE</b>	<b>TOTAL POPULATION</b>	<b>POPULATION PERCENTAGE</b>
White	148,838	45.9
Black	4,856	1.5
Amer Ind/Alaskan	3,260	1.0
Asian	34,158	10.5
Native Haw/Pac Islander	976	0.3
Hispanic/Latino(a)	253,928	78.2

(a) Hispanics may be of any race

City staff also reviewed the 2010 U.S. Census to determine that 82% of the City population (266,121 LEP speakers) spoke a language other than English at home. This meets the Department of Justice (DOJ) Safe Harbor provision of "every 1000 speakers or 5% of the population; whichever is less."

In the County of Orange, 367,299 Spanish-speaking residents speak English "less than very well" (49%) and 100,797 Vietnamese-speaking residents speak English "less than very well" (61.8%).

Based on the four-factor analysis, the City of Santa Ana has identified the language needs and services required to provide meaningful access to information for the LEP residents of Santa Ana. 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.

### **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.

## **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY PLAN**

- Provide language identification forms which invite LEP persons to identify their language needs to our staff members. Records will be maintained for a 3-year period.

**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.

### ***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 materials in a variety of languages based on demographics, including Spanish and Vietnamese.
- 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, as needed.
- Arrange for the services of voluntary community interpreters who are trained and competent in the skill of interpreting.

## **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY PLAN**

- Familiarity with Disability Awareness, Ethics, Civil Rights and Conflict Management issues.

This LEP plan will be distributed to all staff assigned at public counters.

### ***D. Providing Notice to LEP Persons***

Notice of language assistance services will be accomplished as follows:

- Signs to be posted in the entry areas regarding the availability of services and that they are free of charge.
- Website, documents, and brochures will be offered or printed in alternative languages and will include that, language services are available and are free of charge.
- Staff will inform LEP persons that language assistance is available and is free of charge.

### **MONITORING AND UPDATING THE LEP**

In July of each year, a Personnel Services representative 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 and procedures and how to carry them out;
- Gathering feedback from LEP communities in the service areas of the City, such as schools, faith-communities, and other resources.

### **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 Santa Ana Workforce Investment Board.

**Linguistically Isolated:** This term is defined in the Census as the percentage of the persons in

## **CITY OF SANTA ANA LIMITED ENGLISH PROFICIENCY PLAN**

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 Santa Ana's website [www.santa-ana.org](http://www.santa-ana.org). Any person or agency may request a copy of the LEP Plan via telephone, 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 the Public Works Agency, Title VI Coordinator, City of Santa Ana, 20 Civic Center Plaza, M-21, Santa Ana, CA 92701.