



City of Downey

# CITY-WIDE TITLE VI PROGRAM: LANGUAGE ACCESS PLAN

Revised October 2019

This document sets forth policies and procedures to effectively monitor and ensure that the City of Downey is in compliance with Title VI of the Civil Rights Act of 1964 as required by law and in keeping with the guidance documents developed by the US Federal Agencies from which the City receives funding.

DOWNEY CITY-WIDE TITLE VI PROGRAM

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## **I. INTRODUCTION**

The City of Downey is proudly committed to continuously improving the quality of life for the Downey community by providing excellent service in a professional, ethical and responsible manner. Downey is a place of pride, history, civic involvement and community cohesion. The City is committed to ensuring that all citizens are provided services and opportunities to engage in City decision-making without regard to race, color, religion, gender, age, national origin, disability, marital status, sexual orientation, or military status. This commitment to inclusion and service is reflected in this Citywide Language Access Plan (Title VI Program). As required by Federal regulations and as set forth in Title VI of the Civil Rights Act of 1964\*, the City of Downey is reiterating its commitment to fair and equitable access to the City's services, specifically:

*"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." (42 U.S.C. 2000d)*

Though this Language Access Plan addresses Title VI requirements, Downey is nonetheless committed to regulatory requirements other nondiscrimination statutes that afford legal protection, including: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability).

To ensure that all residents are given equitable access to City services and provided an opportunity take part in planning and decision-making (and as required by law as a recipient of federal funding), the City of Downey will ensure full compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes. Additionally, the City-wide Title VI complaint form includes an area to report any form of discrimination.

This Citywide Language Access Plan was updated in conformance with Title VI and other non-discrimination statutes that afford legal protection (May 8, 2018, May 28, 2019, and October 8, 2019).

## **II. TITLE VI CITYWIDE LANGUAGE ACCESS PLAN**

### **A. Notifying Beneficiaries of Protection under Title VI**

In order to comply with 49 CFR, Section 21.9(d), the City shall provide information to the public regarding the City's obligations under the Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

The City of Downey will inform members of the public of their Title VI protection in a variety of ways, including:

- On the City's website at <http://www.downeyca.org>;
- Posting of notices inside all Dial-A-Ride and Fixed-Route vehicles;
- Posting of notices in the public area of City Hall, the Transit Center, the Barbara J. Riley Community and Senior Center, the McCaughan Gym, the Downey City Library, and the Downey Police Department.

## **B. Language Services/Resources Available for Staff to Provide Access for LEP Individuals**

The City has developed several resources which will be available for staff to provide free and appropriate translations or interpretation. These resources include:

### 1. Oral Interpretation

#### a. Oral Interpretation Resources

The City has various resources to provide oral interpretation. These resources cover a range of interpretive needs, from technical language to simple communications such as requests for forms, completion of simple applications, and providing directions or answering general questions.

These resources currently include:

- Spanish-speaking staff members who have been tested and receive bi-lingual pay;
- Contracted telephonic interpretation e.g. Language Line for Spanish or other languages;
- On-call consultant resources for in-person and written translation
- Connections with community organizations serving the specific LEP population;
- Staff members who speak a language in addition to English and have not been tested\*;
- Bi-lingual volunteers, including volunteers from Fire and Police Explorers, Friends of the Library, Columbia Memorial Space Center volunteers, and ASPIRE after school program volunteers\*; and
- Use of Google Translate via computer, tablet or cell phone\*

\* these resources will be used primarily for simple form completion, outreach events, and basic service inquiries such as office hours or directions

#### b. Timing of Interpretation

*On-Demand Oral Interpretation.* Generally, interpretation will be available “on demand” for standard inquiries about City services, codes and permits, police activities and enforcement, and administrative procedures, including assistance in completing forms which are not available in the LEP individual’s language.

*Advance Notice Oral Interpretation.* On occasion, prior notice of the need for oral interpretation will be required. Generally, this will occur when City procedures or the technical nature of the translation requires special arrangements, including:

- Oral interpretation of public comment at City Council, Committee or other government meetings will require 48 hours advance notice (as will be stated on the public notices).
- Oral interpretation of services with technical language (e.g. building and safety) may require advance notice to identify interpreters with the relevant knowledge.

In all cases where advance notice is required, the City will make every effort to minimize the delay and ensure the needs of the LEP individuals are met.

### 2. Written Translations

#### a. Spanish

The City will have available upon request translated versions of forms/service information which are most commonly used or are considered “vital” under City policy (Section II, Part C, *Criteria to Identify “Vital Documents”*).

b. Korean

The City will begin translating forms and service brochures as requested by Korean LEP individuals. For vital forms, the city will provide initial oral interpretation of the form or publication and will follow with written translations if requested by the LEP individual. Untranslated vital documents will, whenever possible, carry a statement in Korean informing LEP Korean speakers that translation into Korean is available.

c. Other languages

The City will rely on telephonic or qualified local interpretation of forms and service information for languages other than Korean or Spanish. For vital documents, the city will provide written translation of forms if requested by LEP individual.

### C. Criteria to Identify “Vital Documents”

The City has determined that the following factors will be used to guide staff in their classification of a document (form or information brochure/sheet) as *vital*. Staff will be asked to consider that the following factors when classifying documents:

1. Forms that are required to be completed before the LEP individual may access a City service, for example:
  - Library card applications
  - Application or registration forms
  - Intake forms
2. Commonly used forms or public outreach materials that seldom change and are central for important services or that commonly result in fines or may have other financial impact, for example:
  - Yard Sale Permits
3. Mechanisms by which the public participates in City governance and planning, for example:
  - Service surveys/feedback forms
  - Notices of public briefings or focus groups
4. Service announcements and materials that serve as the principal outreach mechanism.

Since “lack of awareness that a particular program, right, or service exists may effectively deny LEP persons meaningful access,” staff will regularly assess the needs of the populations frequently encountered or affected by the program or activity to determine whether certain outreach materials should be translated. Note that budget considerations and/or outreach methods may require that the format of the translated text may be different from the English version.

#### **D. Policy on Use of Family and/or Friends for Oral Interpretation**

Surveys of staff and managers in the City of Downey have demonstrated that it is most common for LEP individuals to bring an English-proficient friend or family member when accessing City services. The City respects the LEP individual's right to select their own interpreters. However, the City also recognizes its responsibility to ensure that LEP individuals make an informed choice. Therefore, a notice in English, Spanish, and Korean will be posted at public counters and public information boards informing LEP individuals that certified interpretation services are available at no cost to the LEP individual.

Further, in some situations staff may determine that a friend/family interpreter may not be appropriate, including situations where:

- the language is too technical and/or requires specialized understanding;
- the translator may have a conflict of interest (generally legal matters); or,
- the subject matter is inappropriate or too advanced for use of a minor child (e.g. code enforcement, domestic violence).

In these instances, staff will be instructed that, whenever possible, they should call a certified staff translator or a telephonic translator to help ensure the LEP individual understands their right to a free translator.

#### **E. Proactive Outreach to LEP Individuals**

The City of Downey is committed to facilitating and encouraging participation by all Downey residents in civic planning and services. Downey has used – and will continue to use – a number of avenues to reach the greatest number of residents. These activities include, but are not limited to:

- working directly with the network of community organizations and social services agencies that serve Downey to reach LEP populations and to track the needs of the communities they serve;
- ensuring public workshops, focus groups, and community meetings are held at a variety of times and locations and that translators for Spanish and Korean are available (by request) either in person or by phone;
- disseminating flyers or notices through the schools;
- and distributing outreach materials.

#### **F. Title VI Complaints**

The City of Downey takes allegations of discrimination of any kind very seriously. Three specific categories of discrimination fall under Federal Title VI regulations: discrimination on the basis of race, color or national origin. As a recipient of Federal funding, the City is required to develop procedures for investigating and tracking Title VI complaints filed against the City and to make these procedures for filing a complaint available to the general public.

The City has developed the following Title VI complaint procedures. Both the complaint procedures and the complaint form will be posted in English, Spanish and Korean on the City's website. They will also be available on the City's shared network drive for any City staff member to print as requested. This procedure is the same for other nondiscrimination statutes complaints (except for ADA complaints as the City has developed a separate ADA Complaint and Grievance Procedure.)

## 1. City of Downey Title VI Complaint Procedures

### (a) Complaint Submission

If a patron believes he/she has received discriminatory treatment on the basis of race, color, religion, gender, age, national origin, disability (handled by a separate process), marital status, sexual orientation, or military status, including limited English proficiency, by a City of Downey staff member or a staff member of a contract service provider (e.g. the Transit contractor), the patron will have the right to file a complaint with the City. The complaint must be filed within 180 calendar days of the alleged incident. Title VI complaint procedures will be available in English, Spanish and Korean.

### (b) Complaint Investigation Process

Per the FHWA Guidance Memorandum, *Processing of Title VI Complaints*, dated June 13, 2018, all Title VI complaints received by a sub-recipient (the City of Downey) will be forwarded to Caltrans (email to: Title.VI@dot.ca.gov) to be submitted to FHWA Division Office within one business day of receipt. Similarly, if a complaint is received by an FTA sub-recipient, those are to be forwarded to the FTA for investigation or review (mail to: Federal Transit Administration- Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590). The FHWA/FTA will then forward that complaint to the U.S. Department of Transportation Headquarters Office of Civil Rights (HCR) within one business day of receipt. If HCR determines a Title VI complaint against a sub-recipient can be investigated by a Caltrans, HCR may delegate the task of investigating the complaint to Caltrans. If Caltrans' Office of Business & Economic Opportunity (OBEO) is delegated the responsibility of performing an investigation, OBEO has 90 days to investigate the complaint. If additional time is needed, OBEO will call the Complainant and inform them.

If more information is needed to resolve the case, the OBEO investigator may contact the Complainant. The Complainant has ten business days from the date of the letter to send the requested information to the investigator assigned to the case.

If the investigator is not contacted by the Complainant or does not receive the additional information within ten business days, OBEO will consult with HCR regarding the disposition of the complaint. Disposition of Title VI complaint will be undertaken by HCR, through either (1) *informal resolution* or (2) *issuance of a Letter of Finding of compliance or noncompliance with Title VI*. A copy of the Letter of Finding will be sent to all parties via the Division Office.

#### FTA – Filing a Local Complaint

FTA recommends, but does not require, that individuals first file a complaint directly with their transit provider to give it an opportunity to resolve the situation. FTA grantees are required under the ADA, Title VI, and EEO to have local complaint procedures.

#### Complaints Filed Against California Department of Transportation (Caltrans)

Written complaints filed with Caltrans in which Caltrans is named as the Respondent will be forwarded to Federal Highway Administration (FHWA) Division Office, or Federal

Transit Agency (FTA), depending on who is the oversight agency, for investigation. The FHWA/FTA will then forward that complaint to the Headquarters Office of Civil Rights (HCR). All complaints filed under Title VI against State DOT's are investigated by HCR.

(c) Submission of Complaint Directly to Caltrans and to the Federal Department

Complainant may, at any time, submit the complaint directly to the relevant Federal Department for investigation, including:

- California Department of Transportation, Office of Business & Economic Opportunity, 1823 14<sup>th</sup> Street, Sacramento, California 95811. (916) 324-0449, TTY 711, [title.vi@dot.ca.gov](mailto:title.vi@dot.ca.gov)
- U.S. Department of Transportation, Federal Highway Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590. (202)366-0693, [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov)

- Title Vi And Other Discrimination Complaint Form - <https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?frmid=OBEO0002>

FORMULARIO DE QUEJAS DE DISCRIMINACIÓN DEL TÍTULO VI Y OTRAS - <http://cefs2.dot.ca.gov/v2Forms/servlet/FormRenderer?frmid=OBEO0002ES>

FHWA F.A.Q for Complaints Alleging Violations for Title VI - [https://www.fhwa.dot.gov/civilrights/programs/docs/FHWA\\_Title\\_VI%20\\_Complaint\\_QA.pdf](https://www.fhwa.dot.gov/civilrights/programs/docs/FHWA_Title_VI%20_Complaint_QA.pdf)

- U.S. Department of Transportation, Federal Transit Administration- Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590, such a complaint must be filed within 180 calendar days of the date of the alleged discrimination.
- U.S. Department of Housing and Urban Development, One Sansome Street, Suite 1200, San Francisco, CA 94104, (415) 489-6400
- U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001. (202) 514-2000
- US Department of Homeland Security, Office for Civil Rights and Civil Liberties, Review and Compliance, 245 Murray Lane, SW., Building 410, Mail Stop #0190, Washington, DC 20528. (866) 644-8360, Toll Free TTY: (866)644-8361, Fax: (202) 401-4708, [crcl@dhs.gov](mailto:crcl@dhs.gov).

2. Ensuring Easy Access to Complaint Form and Procedures

The City has developed a Title VI Complaint Form to document all complaints received by City and/or contractor staff (Attachment #2). This form is available in English, Spanish and Korean on the City's website and from any staff member from the City's shared network folder. The form will also be available via email or US mailed for free upon request.

3. Tracking and Recording Title VI Investigations, Complaints, and Lawsuits.

The City will maintain a list of all Title VI and of other nondiscrimination status investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, religion, gender, age, national origin, disability, marital status, sexual orientation, or military status in City activities and programs. The list will include shall



include:

- The date that the investigation, lawsuit, or complaint was filed,
- A summary of the allegations(s),
- The status of the investigation, lawsuit, or complaint, and
- Actions taken by the City in response, or final findings related to the investigation, lawsuit, or complaint.

The list will be maintained by the City office and an updated copy provided to the City Manager's office on a periodic basis.

### **G. Staff Training**

The City will take steps to ensure that all staff and Department Heads – not just those from “front desk” programs – are aware not only of the importance of serving LEP individuals, but also the various methods available to serve the LEP population.

At least annually, Title VI and the City's Title VI Language Access Plan will be an agenda item at a weekly Department Head meeting. At that time, Department Heads will receive training on the requirements of the City's Title VI plan. Training will include:

- types of language services available;
- how staff can obtain those services;
- how to respond to LEP callers and visitors;
- how to handle written communications from LEP persons; and,
- how to determine which translation avenue is more appropriate based on complexity and importance of the subject being translated or because a potential conflict of interest exists.

Title VI guidelines and information will be given to all new hires – whether full time or part time – as part of their regular new hire orientation. This information will include information on Title VI requirements as well as instructions on what to do if they encounter an LEP individual.

Similarly, managers are required to ensure that volunteers are trained in the requirements of Title VI and how to respond to LEP callers and visitors.

**ATTACHMENT #1**

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**≡ TITLE VI COMPLAINT FORM ≡**



## Title VI Complaint Form

As set forth in Title VI of the Civil Rights Act of 1964:

*"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." (42 U.S.C. 2000d)*

If you believe you have been the target of discrimination on the basis of race, color, national origin, religion, gender, age, disability (handled through a separate the ADA complaint and grievance procedure), marital status, sexual orientation, or military status, please complete this form in as much detail as possible. This completed form must be submitted within 180 days of the incident. If you need help completing this form for any reason, please contact the Downey Human Resources Department at (562) 904-7292.

|   |  |
|---|--|
| <b>Section I:</b>   |  |
| Name:   | _____  |
| Address:  | _____  |
| Telephone (Home):   | _____ Telephone (Cell): _____                            |
| Email Address:  | _____  |
| <b>Section II:</b>  |  |
| Are you filing this complaint on your own behalf?   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| If you answered "Yes," go to Section III  |  |
| If you answered "No":   |  |
| Please supply the name and relationship of the person for whom you are filing this form: _____  |  |
| Explain why you have filed for a third party: _____   |  |
| Have you obtained the permission of the aggrieved party?  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <b>Section III:</b>   |  |
| I believe the discrimination experienced was based on (check all that apply):   |  |
| <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other* _____ |  |
| Date of Alleged Discrimination (Month, Day, Year): _____  |  |
| (continued on back)   |  |

Explain as clearly and completely as possible what happened and why you believe you (or another) were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets.

**Section IV:**

Have you previously filed a Title VI complaint with this agency?

Yes

No

**Section V:**

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

If yes, check all that apply and list the agency's name:

- Federal Agency \_\_\_\_\_  State Agency \_\_\_\_\_
- Federal Court \_\_\_\_\_  State Court \_\_\_\_\_
- Local Agency \_\_\_\_\_  Other \_\_\_\_\_

Please provide information for the contact person at the agency/court(s) where the complaint was filed. (Please attach additional sheets if more than one agency/court.)

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Please attach any written materials or other information that you think is relevant to your complaint. Signature and date are required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:

Director, Downey Human Resources Department  
11111 Brookshire Ave.  
Downey, CA 90242  
(562) 904-7292

ATTACHMENT #2

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≡ TRACKING OF TITLE VI  
INVESTIGATIONS, COMPLAINTS  
AND LAWSUITS ≡

**City of Downey  
Tracking Title VI Investigations, Complaints and Lawsuits**

| <b>Complaints</b>       |                                   |                                |                     |  |        |              |
|-------------------------|-----------------------------------|--------------------------------|---------------------|--|--------|--------------|
| Date Complaint Received | City Department/Division Involved | Type of Alleged Discrimination | Name of Complainant | Name of Target of Alleged Discrimination | Status | Action Taken |
|                         |                                   |                                |                     |  |        |              |
|                         |                                   |                                |                     |  |        |              |
|                         |                                   |                                |                     |  |        |              |
|                         |                                   |                                |                     |  |        |              |
|                         |                                   |                                |                     |  |        |              |

| <b>Investigations</b>      |                              |                                |  |        |                         |
|----------------------------|------------------------------|--------------------------------|--|--------|-------------------------|
| Date of Original Complaint | Date Investigation Commenced | Type of Alleged Discrimination | Name of Target of Alleged Discrimination | Status | Resolution/Action Taken |
|                            |                              |                                |  |        |                         |
|                            |                              |                                |  |        |                         |
|                            |                              |                                |  |        |                         |
|                            |                              |                                |  |        |                         |
|                            |                              |                                |  |        |                         |

| <b>Lawsuits</b>    |                                |                                   |                               |        |            |
|--------------------|--------------------------------|-----------------------------------|-------------------------------|--------|------------|
| Date Lawsuit Filed | Type of Alleged Discrimination | City Department/Division Involved | Name of Person who Filed Suit | Status | Resolution |
|                    |                                |                                   |                               |        |            |
|                    |                                |                                   |                               |        |            |
|                    |                                |                                   |                               |        |            |
|                    |                                |                                   |                               |        |            |
|                    |                                |                                   |                               |        |            |

## **APPENDICES OF AGENCY SPECIFIC REQUIREMENTS**

The City-wide Language Access Plan applies equally to all City departments and programs. In addition, some federal funding sources have specific rules or address specific programs. The following appendices are intended to address agency-specific requirements or federal agency guidance(s) that impact selected programs or departments.

## APPENDIX #1

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### AGENCY SPECIFIC REQUIREMENTS

## **DEPARTMENT OF HOMELAND SECURITY**



## **I. Downey Police Department**

The US Department of Homeland Security provides additional oversight of civic Police and Fire departments. For police, the DHS guidance mirrors that of the US DOJ. Therefore discussion of special Title VI policies and procedures for the Downey Police Department are addressed in Appendix 3 (US Department of Justice section).

## **II. Downey Fire Department**

### **A. Fire Dispatch**

Through a contract provided by the California Office of Emergency Services, the dispatchers in the Joint Communication Center which dispatches for Downey Fire have access to telephone translation for any LEP calls. Dispatchers are trained to connect with and work through the telephonic service.

### **B. Emergency Medical Services**

EMS staff carry tablets in their emergency vehicles and have installed Google Translate to assist in emergency situations. Through a City contract, staff also have access the same telephone translation service used in the dispatch center.

### **C. Community Outreach and Involvement**

Downey Fire Department is committed to ensuring LEP communities have access to the information needed to practice fire safety, including:

#### **1. Outreach Materials**

Whenever possible, Downey Fire will provide public outreach and education materials in both Spanish and English. For general education materials (e.g. smoke alarm maintenance), the department might use existing translated materials from other Fire organizations such as LA County Fire, the National Fire Prevention Association, etc.

#### **2. Explorer Recruitment**

To encourage participation by bilingual individuals, Explorer outreach materials will be included in packages sent to community outreach partners. (Because English proficiency is required for the program, materials will be sent in English only.)

#### **3. Community Emergency Response Team (CERT)**

To encourage participation by bilingual individuals, CERT outreach materials will be included in packages sent to community outreach partners. In addition, Downey will work with Area E Regional CERT to find ways to recruit and train bilingual CERT trainees with an emphasis on Spanish-speakers.

### **D. DHS-related Complaints**

In addition to the city-wide Title VI complaint procedures outlined in section II F, complaints alleging that the City has failed to provide meaningful access to programs and services for LEP

persons may also be sent to the DHS CRCL in any language to:

*By Mail:*

Department of Homeland Security,  
Office for Civil Rights and Civil Liberties, Review and Compliance 245 Murray  
Lane, SW., Building 410  
Mail Stop #0190  
Washington, DC 20528.

*Telephone/Fax:*

Local: 202-401-1474, Toll Free: 1-866-644-8360,  
Local TTY: 202-401-0470, Toll Free TTY: 1-866-644-8361, Fax: 202-401-4708.

*E-mail Address:*

crcl@dhs.gov.

## APPENDIX #2

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### AGENCY SPECIFIC REQUIREMENTS

## **DEPARTMENT OF JUSTICE (DOJ)**

## **I. Downey Police Department**

The Downey Police Department is committed to protecting the lives, property and rights of all community members – regardless of language abilities.

### **A. Law Enforcement Continuum**

Downey Police Department has policies and procedures to serve LEP individuals at every step of the Law Enforcement Continuum.

1. Receiving and Responding to Requests for Assistance
  - Downey Police Dispatch (911 and non-emergency calls) have access to telephonic interpretation at all times. In addition, Spanish language experience is “strongly preferred” in the hiring of dispatchers.
  - For urgent calls from LEP speakers, bi-lingual officers (if on duty) are cleared to respond immediately.
  - For non-urgent LEP calls or calls where bi-lingual officers are not on duty, all officers carry a wallet card which bears the telephonic translation number and passcode.
2. Enforcement Stops Short of Arrest and Field Investigations  
For enforcement stops, Downey PD applies the same policies as described above for responding officers.
3. Custodial Interrogations  
In addition to bilingual officers and telephonic interpretation services, Downey PD regularly calls on neighboring police agencies to provide bilingual officers.
4. Intake/Detention  
Downey operates only a temporary holding facility. The same interpretation resources will be used to provide appropriate explanations and elicit necessary information.

### **B. Selection of Oral Interpreters**

Downey Police Department currently offers the opportunity for officers and staff to take bilingual certification tests in Spanish and several other languages. For steps 1 and 2 on the Law Enforcement Continuum, the preferred procedure is to have bilingual officers or PD staff (depending on situation) respond to the call.

For languages for which no staff/officer are certified, officers are trained to judge whether a family/friend may act as oral interpreter. The officers take into account several factors, including possible conflicts of interest, the subject matter (particularly when a minor is functioning as interpreter), and the severity of the issue. If there is any question of the appropriateness of using informal interpreters, officers are instructed to call the professional telephonic interpretation service.

### **C. Community Outreach and Involvement**

The Downey Police Department recognizes the importance of outreach to the LEP community. It is a priority of the PD to not only recruit bilingual officers, but also key staff who can assist with outreach and coordination with LEP populations.

1. Explorer Program

To encourage participation by bilingual individuals, Explorer outreach materials will be included in packages sent to community outreach partners. (Because English proficiency is required for the program, materials will be sent in English only.)

2. Neighborhood Watch

The department's current Neighborhood Watch Coordinator is bi-lingual in Spanish and English. The department is currently working on translating its Neighborhood Watch handouts to Spanish. If questions do arise in a language other than English and there are no on-duty personnel available to provide translation, the telephonic translator service is used.

## APPENDIX #3

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### AGENCY SPECIFIC REQUIREMENTS

**INSTITUTE OF MUSEUM  
AND LIBRARY SERVICES (IMLS)  
NATIONAL FOUNDATION ON THE ARTS AND THE HUMANITIES**

## **I. The Downey Library**

The Downey Library has in place a number of services and resources for LEP individuals.

### **A. Vital Documents**

As indicated in the City-wide Language Access Plan, documents that provide access to Library services will be translated into Spanish (or Korean upon request). Specifically:

- Library Card Application
- Library Brochure/Description of Services, including:
  - Children’s program fliers
  - Adult literacy program
  - Online Library catalog
  - Computer lab and WiFi information
  - Listing of Computer classes

### **B. Collections/Holdings**

The Downey Library has existing Spanish and Korean language collections. Signs in Korean and Spanish provide clear visual indication that these holdings are available.

### **C. Volunteer Recruitment**

To encourage participation by bilingual individuals, information on Library volunteer opportunities will be included in materials circulated to community partners.

## **II. Columbia Memorial Space Center**

### **A. Volunteer Recruitment**

To encourage participation by bilingual individuals, information on docents and museum volunteer opportunities will be included in materials circulated to community partners.

### **B. Exhibit Translation**

The City will explore ways to work with community partners to translate the exhibit information for permanent exhibits into Spanish.

## APPENDIX #4

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### AGENCY SPECIFIC REQUIREMENTS

## **HOUSING & URBAN DEVELOPMENT (HUD)**



## **I. Annual Action Plan Development for CDBG and HOME Programs**

As required by (24 CFR 91, Subpart B, “Citizen Participation and Consultation”), the following steps will be taken to ensure LEP individuals are able to fully participate in planning.

### **1. Community Meetings**

In order to encourage the greatest possible participation of all elements of the community – including LEP individuals – the Community Development Department offers community meetings at various times and locations. Announcements of these meetings will be posted in English and Spanish (with the key information translated into Korea, including meeting title, date and location and how to request a full translation). Notices will carry a statement that telephonic interpretation is available upon request and with advance notice.

### **2. Draft and Final Plans**

Any drafts and final plans which are made available to the public will be translated into Spanish and posted on the City website and circulated to community partners and any resident who requests to receive the draft and final plan.

## **II. Affirmative Outreach**

The Community Development Department will pursue a range of outreach avenues to reach those LEP individuals who are least likely to apply. These methods include:

- providing assistance with translations and community access (as requested) to nonprofits who build and manage low-income housing in Downey;
- postings on the City website and social media;
- posting bilingual outreach materials in City buildings; and,
- circulating outreach materials about services, programs and community meetings to the City’s community network. The community network comprises those local organizations that are most likely to provide services for low income and/or LAP individuals (e.g. churches, food banks, school district, adult school, etc.)

## APPENDIX #5

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### AGENCY SPECIFIC REQUIREMENTS

## **FEDERAL TRANSIT ADMINISTRATION (FTA)**

Note:

The FTA has specific requirements for a Title VI plan for the City's Transit Services. An updated Title VI Plan must be submitted every three years and must include a report on outreach efforts, city demographics, Transit system standards, and other Transit-specific requirements. The following pages represent the full submission for FTA and will include information already contained in the policies and procedures above.