

**City of Tolleson**  
**Limited English Proficiency Plan**  
**Updated 2021**

**INTRODUCTION**

This Limited English Proficiency Plan (“LEP Plan”) has been prepared to address the City of Tolleson’s responsibilities as a recipient of federal financial assistance as such responsibilities related to the needs of individuals with limited English language skills. The LEP Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which 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.

Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying the recipients’ obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the City of Tolleson (“City”) which receives federal assistance through Maricopa County and the State of Arizona.

**LEP PLAN SUMMARY**

The City has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (“LEP”) who wish to access services provided by the City. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English.

This LEP Plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, how to notify LEP persons that assistance is available, and information for future LEP Plan updates.

In developing this LEP Plan, the City undertook the four-factor LEP analysis which considers the following factors: 1) the number or proportion of LEP persons in the service area who may be served or are likely to encounter a City program, activity, or service; 2) the frequency with which LEP persons come into contact with City programs, activities, or services; 3) the nature and importance of programs, activities, or services provided by the City to the LEP population; and 4) the resources available to the City and the overall costs to provide LEP assistance. A summary of the results of the four-factor analysis is provided in the following section.

**FOUR-FACTOR ANALYSIS**

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City program, activity, or service.

The City of Tolleson is a city of 7,340 people, according to 2020 estimates from the U.S. Census Bureau, and these same estimates state that 16.4% of the city’s population is living in poverty (approximately 1204 residents) and 63.3% of the population is low- to moderate- income.

To determine LEP populations in the City of Tolleson, City staff reviewed the HUD-supplied data on limited English proficiency. ***The predominant LEP population identified in the service area based on American Community (ACS) data is comprised of residents who speak Spanish. Sixteen percent of the population speaks English “less than very well” and 100% of those people speak Spanish.***

- ACS 2020 5-year data (Table C16001: Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over) shows that of the 6767 persons in the City, 2117 persons (33.5% of the population) speak only English; 4650 persons (68.7% of the population) speak a language other than English. In the City, 1085 persons (16%) have Limited English Proficiency (LEP), that is, they speak English “less than very well.” Of those persons with LEP, 1085 (100%) speak Spanish.
- Past data show similar numbers. The 2012-2016 ACS (Table S1601: Language Spoken at Home) revealed that of 6445 persons in the City, 2144 persons (33.3% of the population) speak only English, and 4301 persons (66.7%) speak a language other than English. In the City, 1344 persons (20.9% of the population) speak English “less than very well.” Of those persons who speak English less than very well, 1336 speak Spanish and 8 speak other languages.

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

The City assessed the frequency with which employees have, or could have, contact with LEP persons whether through customer service interactions or at public meetings. City staff indicated they have daily contact with LEP persons, primarily those speaking Spanish, as evidenced by requests for bilingual staff and by requests for translation of City documents. Each department provides Spanish interpretation on an as needed basis, and regularly provides printed materials in Spanish as well.

Outreach efforts to residents in the City of Tolleson typically relate to elections, health and safety, water, infrastructure, transportation, recreation, and social services available, including the availability of the City’s Housing Rehabilitation program. Publications and other material disseminated regarding these services and programs are routinely available in both English and Spanish, and interpretation as well as translation of documents about these programs will be made available in other languages upon request.

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

The CDBG program serves primarily the low-to-moderate income portion of the community, and all City services provide benefit to all members of the City of Tolleson community. As such, these programs and services are important to the City’s LEP population. Because such a large proportion of the City’s population speaks Spanish or Spanish only, multiple social, service, professional, and leadership organizations within the City service area focus outreach to LEP Spanish-speaking individuals. The City Council and City management have made it a priority to ensure that LEP assistance is available within the City.

4. The resources available to the City and overall costs to provide LEP assistance.

The City of Tolleson uses available resources, both internal and external, to accommodate reasonable requests for language assistance including translation. Tolleson ensures that, when requested, interpretation services will be provided free of cost, regardless of the language, when requested with reasonable notice.

All City staff have access to a contractor that can provide telephonic, written, and in person meeting translation and interpretation services. The City will monitor the services provided and update the translation and interpretation service contracts as needed.

The City of Tolleson staff includes 75 employees (or 35% of the staff) who are bilingual in English and Spanish. City Council approved a Bilingual Pay Program designed to encourage the availability of bilingual personnel to enhance the customer services available to City residents. Currently 27% of our employee population is in the Bilingual Pay Program.

Additionally, each Department identifies which documents are vital for the public and makes those available in Spanish as well as English. When requested, those vital documents can be made available in other languages.

Based on the four-factor analysis, the City developed its LEP Plan as outlined in the following section.

## **LANGUAGE ASSISTANCE PLAN**

### 1. Identification of LEP persons in Need of Language Assistance

Below are tools City staff use to help identify persons who may need language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- Front-line staff are surveyed on their experience concerning any contact with LEP persons during the previous year.
- When working with someone in person, staff can use the Language Identification Chart and/or Language Notification Flyer to help the LEP person identify the language they speak.
- When the City sponsors an event, a staff person greets participants as they arrive. By informally engaging participants in conversation, staff can gauge each attendee's ability to speak and understand English.

### 2. Language Assistance Measures

- LEP persons who speak Spanish will find that bilingual staff are available in each department to communicate via phone, in person, and in writing about available services and programs.
- All City staff have access to a contractor that can provide telephonic, written, and in person meeting translation and interpretation services for Spanish or any other language spoken by an LEP person.
- City staff who frequently interact with residents use a language identification chart to help an LEP person communicate which language they speak and need assistance in.

### 3. Training Staff

City staff are trained every other year on the City's language assistance measures. The training includes a review of the LEP policies and procedures in place, the LEP assistance available to LEP persons, and the City's obligation to provide meaningful access to services and information for LEP persons regardless of language spoken. Staff who have contact with the public are also trained to work effectively with in-person and telephone interpreters.

### 4. Providing Notice to LEP Persons

The City of Tolleson recognizes that it is important to notify residents that free language assistance will be provided when needed. The City takes the following steps to provide notice to LEP persons:

- Posts language identification chart, language notification flyers, and Limited English Proficiency poster in intake areas and other entry points
- States in outreach documents in appropriate languages that language services are available
- Maintains phone menu in both English and Spanish
- Sends City Newsletter with water bill each month – in both English and Spanish

### 5. Monitoring and Updating the LAP

The City will revisit the Language Assistance Plan on an ongoing basis and make appropriate changes as needed. Updates will include the following:

- The numbers and percentages of LEP persons in the City's service area (and the languages they speak)
- How the needs of LEP persons are being addressed; any updates to types of language access services used to provide better access to services.
- Updates to the list of documents that need to be translated
- A review to determine whether the City is fully complying with the LEP plan
- A review of any language access complaints received during this time period.

### **Dissemination of the LEP Plan**

The City's website has a link to the City of Tolleson LEP plan. The City also posts signs at City Hall and the CAP/Senior Center notifying residents how to access language services.

Questions or comments regarding the LEP Plan may be submitted to the City's Title VI Coordinator:

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