



Language Access Plan

for Persons with Limited English Proficiency

I. Introduction

Title VI (42 USC 2000d et seq.) of the Civil Rights Act of 1964 and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access to programs, activities, and services by persons with limited English proficiency (LEP persons). As a recipient of federal funds, the City of Hammond (City) is thus obligated to reduce language barriers that can bar meaningful access to federally-funded programs, activities, and services by LEP persons. The City has prepared this Language Access Plan (LAP) to define those actions that are and will be taken to ensure such access.

In preparing this LAP, the City conducted a 4-factor analysis considering 1) the number or proportion of LEP persons eligible to be served or likely to be encountered by federally-funded City programs, activities, or services; 2) the frequency with which LEP persons are likely to come into contact with these programs, activities, or services; 3) the nature and importance of these programs, activities, or services to people's lives; and 4) the resources available and costs to the City.

On annual basis, the City will review and update this analysis and this LAP to ensure responsiveness to community needs.

II. 4-factor Analysis

The extent of the City's obligation to provide language assistance services in multiple languages is determined by the City on a case-by-case basis looking at the totality of circumstances in light of 4 factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by federally-funded City programs, activities, or services.

The 2013–17 American Community Survey (ACS) estimates Hammond's total population to be 20,325 and total speaking population (i.e. persons aged 5 and older) to be 19,039. Of this speaking population, approximately 95.3% speaks only English and 4.7% speaks a language other than English—including Spanish (2.5%), other Indo-European languages (1.5%), Asian and Pacific Island languages (0.6%), and other languages (0.1%).

The table below provides ACS estimates for LEP persons by language, persons who speak a language other than English, persons who speak English less than "very well" (LEP Persons), and percent of LEP persons among the total speaking population.

Language	Persons Who Speak a Language Other than English	Persons Who Speak English Less than "Very Well" (LEP Persons)	Percentage of LEP Persons among the Total Speaking Population
Spanish	483	174	0.91
Other Indo-European	289	107	0.56
Asian and Pacific Island	109	0	0
Other Languages	22	0	0

Among Hammond's total speaking population, less than 1.5% are LEP persons—with about 1% of these speaking Spanish and about ½% speaking an Indo-European language.

The United States Census Bureau, which performs the American Community Surveys, classifies the following as Indo-European languages: French, including Cajun French; Haitian; Italian; Portuguese; German; Yiddish, Pennsylvania Dutch, or other West Germanic languages; Greek, Russian, Polish, Serbo-Croatian, Ukrainian or other Slavic languages; Armenian, Persian, including Farsi and Dari; Gujarati; Hindi; Urdu; Punjabi; Bengali; Nepali, Marathi, or other Indic languages; Telugu; Tamil; Malayalam, Kannada, or other Dravidian languages; or Other Indo-European languages.

Given the large number of possible Indo-European languages and the small number (107) and percentage (0.56) of this LEP language group among Hammond's total speaking population, the City recognizes additional data collection will be needed to determine which additional steps, if any, should be taken to ensure meaningful access to the City's federally-funded programs, activities, and services by these LEP persons.

Contact with Southeastern Louisiana University (Southeastern), located in Hammond, revealed that international students who attend the university speak English well enough to succeed in the classroom and as members of the student body (as reported by Southeastern, total enrollment in the fall of 2019 was 14,260 students, of which 190 were international students). Contact with the Tangipahoa Parish School System (TPSS), which serves Hammond, revealed that no TPSS school had a sufficient number of LEP students to warrant language assistance services in the classroom, although such services are available through TPSS's C. M. Fagan Service Center located at 47439 North Oak Street in Hammond.

2. The frequency with which LEP persons are likely to come into contact with federally-funded City programs, activities, or services.

The frequency with which LEP persons living in Hammond are likely to come into contact with the City or its federally funded programs, activities, or services is high—likely as high as 100% when one considers essential municipal services (e.g. police and fire protection; public utilities; public construction projects; waste and recyclables collection; planning, zoning, and permitting; code enforcement; public transportation; educational programs, including afterschool and summer camps; and public recreation, including parks, playspaces, other recreational facilities, events, and programs for seniors, adults, and youth), for which the City routinely seeks and receives federal grants and loans, are used multiple times a day by most residents.

3. The nature and importance of these the federally-funded City programs, activities, or services to people's lives.

The essential municipal services listed above are integral to most residents' lives—and integral to the City's function as a unit of local government. The City's mission is to serve its residents by ensuring their safety and prosperity, enhancing their quality of life, and promoting Hammond as a regional hub for transportation, economics, education, artistic and cultural exchange, and recreation. At the same time, the City must manage Hammond's growth in a responsible and sustainable manner, one that respects the city's unique culture and history, values its main street character and appeal, and engages its residents—whatever their ability—in cultivating a stronger, more vibrant Hammond. Remove the federally-funded programs, activities, and services that support this mission and that support the City's ability to manage—and to respond to—Hammond's growth, and the City is less effective and people's lives are directly and negatively impacted.

4. Resources available and costs to the City.

Resources available to the City include multilingual employees (particularly, those who speak Spanish) and well-established working relationships with local and regional media, including Hammond's *The Daily Star*, Baton Rouge's *The Advocate*, Southeastern Louisiana University's *The Lion's Roar*, TV broadcasters and affiliates, such as Fox 8 WVUE-TV, WDSU Channel 6, WWL-TV Channel 4, and Action News 17, and social media, including the City's website and Facebooks—all used to communicate information to and solicit feedback from residents about programs, activities, and services.

The City also makes use of and encourages persons who have sight, hearing, or speech impairments to make use of the FREE Louisiana Relay Service by dialing 711 or

1-800-947-5277	(Voice)
1-800-846-5277	(TDD/TTY)
1-888-550-5277	(ASCII)
1-888-272-5530	(STS)
1-800-737-1813	(Spanish)

Costs to provide these services are small.

III. "Safe Harbor" Consideration

Several federal agencies have developed "safe harbor" guidelines to assist recipients of federal funding in determining when written translations should be provided. Providing written translations as recommended means that a recipient has displayed strong evidence of compliance with written translation obligations and is considered to be in "safe harbor."

The United States Department of Justice (DOJ), for example, considers the following actions strong evidence of meeting written translation obligations:

- a. the recipient provides written translations of vital documents for each LEP language group that makes up 5% or 1,000, whichever is less, of the population eligible to be served or likely to be encountered (translation of other written materials may be provided orally); or
- b. if there are fewer than 50 persons in a LEP language group that reaches the 5% trigger in a., the recipient provides written notice in the primary language of the group of its right to receive competent oral translation of written materials free of cost.

The United States Department of Housing and Urban Development (HUD) summarizes "safe harbor" this way:

Size of the LEP Language Group	Recommendation
1,000 or more in the population eligible to be served or likely to be encountered <i>or</i> among current beneficiaries	Written translations of vital documents
More than 5% <i>and</i> more than 50 in the population eligible to be served or likely to be encountered <i>or</i> among current beneficiaries	Written translations of vital documents
More than 5% <i>and</i> 50 or less in the population eligible to be served or likely to be encountered <i>or</i> among current beneficiaries	Written notice in the primary language of the group of its right to receive competent oral translation of written materials free of cost
5% or less <i>and</i> less than 1,000 in the population eligible to be served or likely to be encountered <i>or</i> among current beneficiaries	No written translation is required.

Generally speaking, if the recipient provides written translations when a LEP language group makes up 5% or 1,000, whichever is less, of the population eligible to be served or likely to be encountered *or* among current beneficiaries, the recipient will have met its written translation obligations.

The largest identified LEP language group in Hammond—persons who speak Spanish—makes up 0.91% and 107 in the population likely to be encountered. "Safe harbor" guidelines do not currently require written translations at these thresholds, however they remain a consideration for future implementation.

IV. Covered Programs

The City participates, either as the direct recipient or as a pass-through recipient of federal funding, in the following programs, in which LEP persons are generally eligible as direct or indirect beneficiaries. A 4-factor analysis was performed for each.

1. Airport Improvement Program (AIP)

Nature of the Program

This is a Federal Aviation Administration (FAA)-funded program that, through a partnership with the Louisiana Department of Transportation and Development (DOTD), provides direct, matching grants to the City for infrastructure improvements at Hammond Northshore Regional Airport, a general aviation airport that serves private aircraft and small aircraft charter operations, but does not serve scheduled passenger service.

Further Analyses

Among Hammond's total speaking population, LEP persons are unlikely, and with low frequency, to be served, to be encountered by, or to come into contact with this program—though their lives may be indirectly benefited in important ways by the Airport's role as a driver of the local economy (federally-mandated clear zones exist around the Airport to ensure safe aircraft operations and to minimize the impacts of aircraft noise and Airport lighting on the Hammond community). The resources listed under II-4 above are available to this program.

2. Assistance to Firefighters Grant Program (AFG)

Nature of the Program

This is a Federal Emergency Management Agency (FEMA)-funded program that provides direct grants to the City for critically-needed resources to equip and train emergency personnel, enhance operational efficiencies, foster interoperability, and support community resilience. Historically, AFG has funded new and replacement firefighting equipment for Hammond firefighters.

Further Analyses

Among Hammond's total speaking population, LEP persons are unlikely, and with low frequency, to be served, to be encountered by, or to come into contact with this program—though they may encounter and their lives could be profoundly impacted (e.g. in the event of a fire, following a motor vehicle accident) by the program's direct beneficiaries, Hammond firefighters, in the performance of their duties as first responders and code enforcers. The resources listed under II-4 above are available to this program.

3. Aviation Needs and Project Priority Program

Nature of the Program

This is a DOTD-funded program that, through a partnership with the FAA, provides direct, matching grants to the City for infrastructure improvements at Hammond Northshore Regional Airport, a general aviation airport that serves private aircraft and small aircraft charter operations, but does not serve scheduled passenger service.

Further Analyses

Among Hammond's total speaking population, LEP persons are unlikely, and with low frequency, to be served, to be encountered by, or to come into contact with this program—though their lives may be indirectly benefited in important ways by the Airport's role as a driver of the local economy (federally-mandated clear zones exist around the Airport to ensure safe aircraft operations and to minimize the impacts of aircraft noise and Airport lighting on the Hammond community). The resources listed under II-4 above are available to this program.

4. Bulletproof Vest Partnership Program (BVP)

Nature of the Program

This is a federal Office of Justice Programs (OJP)-funded program that provides direct grants to the City for new and replacement body armor for Hammond police officers.

Further Analysis

Among Hammond's total speaking population, LEP persons are unlikely, and with low frequency, to be served, to be encountered by, or to come into contact with this program—though they may encounter and their lives could be profoundly impacted (e.g. if victim of a crime, following a motor vehicle accident) by the program's direct beneficiaries, Hammond police officers, in the performance of their duties as first responders and law enforcers. The resources listed under II-4 above are available to this program.

5. Community Water Enrichment Fund (CWEF)

Nature of the Program

This is a Louisiana Office of Community Development (OCD)-funded program that provides direct grants to the City for needed infrastructure and long-term capital improvements for drinking water projects—principally those that identify and resolve basic human health and safety needs. CWEF is designed to fill the gaps where there is no federal or other State funding available to assist a unit of local government, like the City, in addressing identified, high-priority needs related to drinking water.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with moderate frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by CWEF-funded projects that ensure safe and clean drinking water at their homes and places of work and at the places they visit. The resources listed under II-4 above are available to this program.

6. Clean Water State Revolving Fund Program (CWSRF)

Nature of the Program

This is a federal Environmental Protection Agency (EPA)-funded program administered by the Louisiana Department of Environmental Quality (LDEQ) that provides pass-through, low-interest loans to the City for the construction of sewage treatment facilities and sewerage rehabilitation projects. The goal of CWSRF is improved compliance with the federal Clean Water Act.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with high frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by CWSRF-funded projects that improve the operation of Hammond's South Wastewater Treatment Plant and ensure safe operation of sewerage at their homes and places of work and at the places they visit. The resources listed under II-4 above are available to this program.

7. Edward Byrne Memorial Justice Assistance Grant Program (JAG)

Nature of the Program

This is a federal Bureau of Justice Assistance (BJA)-funded program that provides both direct grants and pass-through grants, administered by the Louisiana Commission on Law Enforcement and Administration of Criminal Justice (LCLE), to the City to support a range of law enforcement programs, including corrections, technology improvements, crime prevention and education, planning and evaluation, and drug enforcement. Historically, JAG has funded new and replacement equipment for Hammond police officers.

Further Analysis

Among Hammond's total speaking population, LEP persons are somewhat likely, and with low frequency, to be served, to be encountered by, or to come into contact with this program—though they may encounter and their lives could be profoundly impacted (e.g. if victim of a crime, following a motor vehicle accident) by the program's direct beneficiaries, Hammond police officers, in the performance of their duties as first responders and law enforcers. In cases where a LEP person is the victim of (or a suspect in) a crime or has been involved in a motor vehicle accident, he/she may be served, be encountered by, or to come into contact with JAG-funded equipment (e.g. electronic records management systems, first aid kits, cameras, police canines). The resources listed under II-4 above are available to this program.

8. Historic Preservation Fund Grant Program (HPF)

Nature of the Program

This is a National Park Service (NPS)-funded program, administered by the Louisiana State Historic Preservation Office (SHPO) that provides pass-through grants to the City to identify and to protect Hammond's historic resources. Historically, HPF has funded standing structure surveys, preservation training and scholarships, and renovations of historic, City-owned buildings in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are somewhat likely, and with low frequency, to be served, to be encountered by, or to come into contact with this program. For those that do, their lives may be directly benefited in important ways by HPF-funded projects that enable historic, City-owned buildings to continue to serve the Hammond community—and more safely, efficiently, or effectively. The resources listed under II-4 above are available to this program.

9. Lake Pontchartrain Basin Restoration Program (PRP)

Nature of the Program

This is an EPA-funded program administered by the University of New Orleans Research and Technology Foundation that provides pass-through grants to the City to preserve, protect, or restore the water quality and/or habitat of the Lake Pontchartrain Basin. Historically, PRP has funded sanitary sewer evaluation surveys (to identify deficient sewerage) and the installation of emergency generators at lift stations (which help to transport sewage to the South Wastewater Treatment Plant) in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are unlikely, and with low frequency, to be served, to be encountered by, or to come into contact with this program. In rare cases, when power outages occur, their lives may be directly benefited in important ways by PRP-funded projects that ensure continued operation of sewerage at their homes and/or places of work and/or at the places they visit. The resources listed under II-4 above are available to this program.

10. Land and Water Conservation Fund Program (LWCF)

Nature of the Program

This is a National Park Service (NPS)-funded program administered by the Louisiana Division of Outdoor Recreation (DOR) that provides pass-through grants to the City for broad-scope outdoor recreation projects, ranging from land acquisition to development of park facilities, such as splash parks, ball fields, picnic pavilions, and restrooms.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with high frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by LWCF-funded projects that improve or create new opportunities for outdoor recreation where they live. The resources listed under II-4 above are available to this program.

11. Louisiana Community Development Block Grant Program (LCDBG)

Nature of the Program

This is a federal Housing and Urban Development (HUD)-funded program administered by OCD that provides pass-through grants to the City to address critical needs in the areas of drinking water, water for fire protection, sewerage, streets, and economic development—principally in areas populated by persons of low to moderate income. Historically, LCDBG has funded drinking water or sewerage projects in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with high frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by LCDBG-funded projects that ensure safe and clean drinking water or continued operation of sewerage at their homes and places of work and at the places they visit. The resources listed under II-4 above are available to this program.

12. Local Government Assistance Program (LGAP)

Nature of the Program

This is an OCD-funded program that provides direct grants to the City for needed infrastructure and long-term capital improvements—principally those that identify and resolve basic human health and safety needs. LGAP is designed to fill the gaps where there is no federal or other State funding available to assist a unit of local government, like the City, in addressing identified, high-priority needs. Historically, LGAP has funded improvements (e.g. emergency generators) or renovations (e.g. new roofs) of essential City buildings in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with moderate frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by LGAP-funded projects that enable City buildings to operate more safely, efficiently, or effectively, including through accessibility improvements, or to remain operational during power outages to provide uninterrupted essential or emergency services. The resources listed under II-4 above are available to this program.

13. State Economic Development Assistance Program (SEDAP)

Nature of the Program

This is a federal Delta Regional Authority (DRA)-funded program that provides direct grants to the City to improve public and transportation infrastructures, encourage business development, and facilitate workforce development. Historically, SEDAP has funded sewage treatment, GIS, and Airport construction projects in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with moderate frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by SEDAP-funded projects that improve the operation of the South Wastewater Treatment Plant and property identification for planning, zoning, permitting, and development, as well as indirectly benefited in important ways by SEDAP-funded projects that improve Airport operations and the Airport's role as a driver of the local economy. The resources listed under II-4 above are available to this program.

14. Traffic Safety Grant Program

Nature of the Program

This is a National Highway Traffic Safety Administration (NHTSA)-funded program administered by the Louisiana Highway Safety Commission (LHSC) that provides pass-through grants to the City to reduce injuries and deaths on Louisiana roads. Historically, Traffic Safety Grants have funded Hammond police officer overtime for impaired driving, occupant protection, and juvenile underage drinking enforcement.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with moderate frequency, to be served, to be encountered by, or to come into contact with this program—and their lives could be profoundly impacted by Traffic Safety Grant-funded projects that focus on keeping impaired drivers off the road, ensuring that lawful drivers and passengers on the road wear their seatbelts (or, in the case of small children, are secured in child seats), and protecting lives. The resources listed under II-4 above are available to this program.

15. Transportation Improvement Program (TIP)

Nature of the Program

This is a Federal Highway Administration (FHWA) and Federal Transit Administration (FTA)-funded program administered by the New Orleans Regional Planning Commission (RPC) and by Tangipahoa Parish Government that provides pass-through funding to the City for surface transportation projects, bicycle and pedestrian facilities, and other transportation enhancements, Federal Lands Highway projects, and safety projects included in the State's Strategic Highway Safety Plan. Historically, TIP has funded railroad crossing and road improvements, transportation studies, bus service, and bus system improvements in Hammond.

Further Analyses

Among Hammond's total speaking population, LEP persons are likely, and with moderate frequency, to be served, to be encountered by, or to come into contact with this program—and their lives may be directly benefited in important ways by TIP-funded projects that enable them commute more safely and easily, including through accessibility improvements, by train, bus, car, bike, or foot. The resources listed under II-4 above are available to this program.

16. Disaster Recovery and Preparedness and Hazard Mitigation Programs

Nature of the Programs

During times of emergency (e.g. attacks on the United States, natural disasters, viral outbreaks), federal and State agencies may make direct and pass-through grants and/or loans available to the City for infrastructure, housing, economic development, planning, and other disaster recovery and preparedness and hazard mitigation efforts. Historically, these types of grants and/or loans followed 9-11 (in 2001) and hurricanes (e.g. Katrina in 2005) and major flood events (in 2016) that impacted Hammond.

Further Analyses

The emergent nature of these programs and their eligibility requirements, historically tailored to the emergency they are meant to respond to, makes annual analyses and updates to this paragraph and/or to this section imperative. Among Hammond's total speaking population, LEP persons are likely, and with low frequency, to be served, to be encountered by, or to come into contact with these programs—and their lives may be directly benefited in important ways—if the emergency affected them directly. The resources listed under II-4 above are available to this program.

V. Actions to Be Taken

After careful analysis of the 4 factors above and consideration of "safe harbor," the City will take the following actions:

1. The City will appoint a Language Access Coordinator

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Human Resources Director
219 E Robert St
PO Box 2788
Hammond LA 70404-2788
985-277-5626

as the point of contact for LEP persons in all City programs, activities, and services—not just those that are federally-funded.

2. The City will create a page on its website to host this LAP, the Language Access Coordinator's contact information, and links to resources for LEP persons, such as the FREE Louisiana Relay Service.
3. The City will distribute copies of this LAP to all Department Heads so that each may maintain a copy on file within his/her department for use by his/her staff when encountering LEP persons.
4. The City will train staff—at a minimum those most likely to encounter LEP persons (e.g. Department Secretaries)—in language identification and the use of "I Speak" resources. When encountering an LEP person and after his/her language has been identified, these staff will contact the Language Access Coordinator for further instructions. If the need for language assistance services is identified, the Language Access Coordinator will take appropriate action to secure these services to ensure the LEP person's meaningful access to City programs, activities, and services.
5. The City will require the Language Access Coordinator to maintain the files and records of the City related to any/all encounters with LEP persons for a minimum of 3 years or, where the City program, activity, or service to which the LEP person was seeking access was federally-funded, for the duration of the federal funding + 3 years. These files and records will be included in annual reviews and updates of 4-factor analyses and this LAP and in evaluating when and where translations into other languages (e.g. Spanish) may be indicated to ensure responsiveness to community needs.

VI. Amendments to this LAP

Amendments to this LAP shall be reviewed, written, and prepared by the Mayor's Office and its departments, then directed to the Hammond City Council for discussion and adoption.

Pete Panepinto, Mayor

Date

Previous Updates: March 2020