



City of Lakewood
Title VI Program



**LAKWOOD
TITLE VI PROGRAM
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LAKEWOOD TITLE VI PROGRAM

City of Lakewood Title VI Policy Statement

It is the policy of the City of Lakewood to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended; 42 USC 2000(d); related statutes and regulations to the end that no person 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.

The City of Lakewood also ensures that individuals with disabilities have equal access to all programs, services and activities, including those provided through digital platforms, in accordance with Title II of the Americans with Disabilities Act (ADA).

The City of Lakewood adopts the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as the standard for digital accessibility and will ensure compliance for all public-facing digital content, services and platforms.

The City of Lakewood strictly forbids and will not tolerate actions that intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title VI, or because he/she has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this policy.

This program has been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 (Title VI) is a federal law that requires no person in the United States on the grounds of race, color, or national origin, be excluded from, be denied the benefits or be subjected to discrimination under any program or activity receiving federal financial assistance. The Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination on the basis of sex. Title VI applies to recipients and sub-recipients of federal financial assistance. The Civil Rights Restoration Act of 1987 makes clear that pursuant to Title VI discrimination is prohibited throughout any department of a local agency that accepts Federal financial assistance.

The City of Lakewood periodically receives federal funding from the Federal Highway Administration (FHWA) and other federal program funding. As a recipient of such federal aid, the City is required to comply with Title VI and the related Department of Transportation regulations (Title 49 CFR Part 21). Accordingly, the City is required to develop a Title VI program to comply with FTA Circular 4702.1B, which was adopted in 2012.

Title VI and Related Authorities

Title VI of the Civil Rights Act of 1964 states the following: “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.”

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.) added the requirement that there be no discrimination on the grounds of sex.

The Civil Rights Restoration Act of 1987, P.L. 100-209, provides clarification of the original intent of Congress in Title VI of the 1964 Civil Rights Act, Title IX of the Educational Amendments Act of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973.

Executive Order 12898 (issued February 11, 1994) addresses Environmental Justice regarding minority and low-income populations. Agencies must develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

Executive Order 13166 (issued August 16, 2000) improves access to services for persons with limited English proficiency. Agencies are directed to evaluate

services provided and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the services provided, consistent with, and without unduly burdening the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to programs, services and information to their LEP applicants and beneficiaries free of charge. Language barriers have the potential of prohibiting LEP persons from:

- Obtaining services and information relating to transportation services, programs and projects.
- Taking advantage of the transit system, which could affect their jobs and social opportunities.
- Understanding the benefits to which they are entitled when their home or business is acquired through eminent domain.

Digital Accessibility Compliance.

In accordance with Title II of the Americans with Disabilities Act (28 CFR Part 35), as updated by the U.S. Department of Justice in 2024, public entities are required to ensure that all services, programs and activities provided or made available through web content and mobile applications are accessible to individuals with disabilities.

The City of Lakewood will ensure that its web content, mobile applications and digital services are accessible to individuals with disabilities in accordance with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. This includes content and services provided directly by the City or through contractual or third-party arrangements.

II. TITLE VI REQUIREMENTS

1. Requirement to Notify Beneficiaries of Protection under Title VI

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

The City of Lakewood informs members of the public of their Title VI protection rights by posting a Notice of Rights under Title VI on the City's website (see Attachment B, Notice of Civil Rights).

2. Requirement to Develop Title VI Complaint Procedures and Complaint Form

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. As such, the complaint procedures and complaint form are available on the City's website. The following complaint procedures have been established for the City's Title VI program:

A. City of Lakewood Title VI Complaint Procedures

1. Submission of Complaint

If a person believes they have been subjected to discrimination by the City of Lakewood, including actions taken by City staff, contractors or through digital service platforms, on the basis of race, color, national origin or disability, they have the right to file a complaint with the City.

Complaints may also include allegations related to accessibility barriers in city programs, services or digital content, including websites, documents, online forms or other electronic services.

Complaints must be filed within sixty (60) calendar days of the alleged discriminatory incident and may be submitted in person during normal business hours, by mail, by phone, by email, or through the City's online complaint form:

- Online: Through the City's website via an accessible online complaint form
- Email: By submitting a written complaint to ADACoordinator@lakewoodca.gov

- Phone: By calling 562-866-9771 (assistance will be provided to document the complaint)
- In-person: At Lakewood City Hall, 5050 Clark Avenue, Lakewood, CA 90712 during regular City Hall business hours
- Mail:

City of Lakewood
City Manager's Office
5050 Clark Avenue
Lakewood CA 90712

The City will take reasonable steps to ensure that individuals with disabilities or limited English proficiency are able to participate in the complaint process, including providing appropriate auxiliary aids and services or language assistance upon request.

Title VI complaint forms are available in English and Spanish.

2. Investigation of Complaints

Upon receipt of a complaint, the City will investigate the complaint. The investigation may include discussion(s) of the complaint with all affected parties to determine the issue. Based on information received, the City will prepare an investigation report. The complainant will receive a letter from the City regarding the decision/findings of the investigation within forty-five (45) calendar days of receipt of the complaint.

If more time is needed to review the complaint, the City will notify the complainant of the estimated time frame for completing the review. Upon completing the review, the City shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the City's Title VI process are needed.

3. Request for Reconsideration

If the complainant disagrees with the City's decision/findings, the complainant may request reconsideration by submitting a written request to the Deputy City Manager within ten (10) calendar days of receipt of the City's decision. The complainant shall provide a detailed description of the request for reconsideration. The Deputy City Manager will notify the complainant of his/her decision either to accept or reject the request for reconsideration within ten (10) calendar days. When the Deputy City Manager agrees to reconsider the matter, the complaint shall be returned to the City's staff for re-evaluation in accordance with the "Investigation of Complaint" procedures described previously.

4. Appeal Process

If the request for reconsideration is denied, the complainant may appeal the Deputy City Manager's response by submitting a written request to the City. The appeal request will be forwarded to the City Manager for final determination.

5. Submission of Complaint to the Department of Transportation

If the complainant is dissatisfied with the City's resolution of the complaint, he/she may submit a complaint to the Department of Transportation for investigation:

Federal Transit
Administration Office of
Civil Rights Attention:
Compliant Team East
Building, 5th Floor – TCR
1200 New Jersey
Avenue, SE Washington,
DC 20590

In accordance with Chapter 9, Complaints, of FTA Circular 4702.1B, such a complaint must be filed within 180 calendar days of the date of the alleged discrimination.

The City has developed a Title VI Complaint Form to document all complaints received by the City. This form is available on the City's website and at the City of Lakewood, City Manager's Office, 5050 Clark Avenue, Lakewood, 90712 (see Attachment C, Complaint Form).

3. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

The City is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin for programs or activities that receive federal financial assistance. The City maintains a list of Title VI investigations, complaints, and lawsuits, including a comprehensive summary and description of actions taken by the City, as required by Title VI regulations (see Attachment D, Title VI Investigation List). The list shall include the date that an investigation, lawsuit, or complaint is received, opened, or filed; a summary of an allegation(s); the status of an investigation, lawsuit, or complaint; and actions taken by the City or final findings related to an investigation, lawsuit, or complaint. The list is included in the City's Title VI submittal to FTA every three (3) years.

4. Language Assistance Plan and Requirement to Provide Meaningful Access to LEP Persons

The Title VI Limited English Proficiency (LEP) Plan includes two components: a Title VI Limited English Proficiency (LEP) Analysis and a Language Assistance Plan. The LEP Analysis includes a four (4) factor analysis, which includes (i) the number of LEP persons in the service area, (ii) frequency that LEP persons utilize transit services, (iii) the nature and importance of programs, activities or services provided to the LEP population, and (iv) resources available to the City and overall costs to provide LEP assistance. The LEP Plan explains the findings of the four (4) factor analysis and describes how the City provides language assistance (see Attachment E, City of Lakewood Title VI Limited English Proficiency – LEP Plan).

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to benefits, services, information, and other important portions of programs and activities for individuals who are LEP. In addition to the steps outlined herein, the City collaborates with the Los Angeles County Metropolitan Transportation Authority (Metro) and other neighborhood stakeholders to ensure that limited English proficient persons have access to transit related information.

In addition to language access, the City ensures accessibility of digital information for individuals with disabilities, including compatibility with assistive technologies such as screen readers, keyboard navigation and captioning.

5. Promoting Inclusive Public Participation

The City is required to develop a public participation plan with outreach efforts to engage community members including low-income individuals, people with disabilities, minority and limited English proficient populations. Notice of Rights under Title VI are displayed on the City's website (see Attachment B, City of Lakewood Notice of Civil Rights).

Goals/Objectives: Ensure that all public participation opportunities, including digital engagement such as online meetings, surveys and web-based content are accessible in accordance with WCAG 2.1 Level AA.

6. Requirement to Provide Additional Information Upon Request

At the discretion of the FTA, information other than that required by the referenced circular, may be requested in writing from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements. The City of Lakewood is available to provide additional information, as needed, and to respond to any verbal or written complaint accordingly.

7. Requirement to Develop System-Wide Standards and Policies

The FTA requires all fixed-route transit operators to develop quantitative service standards and policies for their fixed-route service. This requirement does not apply to the City of Lakewood as the City does not operate a fixed-route service.

8. Minority Representation on Planning or Advisory Board

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, with membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

This requirement does not apply to the City of Lakewood as the City does not have a transportation commission or non-elected transit advisory board to address transportation issues. Rather, the Lakewood City Council serves as the legislative body for all transportation related policy decisions. Therefore, reporting minority representation on a planning or advisory board does not apply to the City of Lakewood.

9. Determination of Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of

facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

10. Digital Accessibility of Programs and Services

The City of Lakewood shall ensure that all digital services, including websites, mobile applications, online forms, electronic documents and social media content are accessible to individuals with disabilities.

Accessibility shall be measured against WCAG 2.1 Level AA standards.

The City will:

- Provide accessible online forms and alternatives
- Ensure documents (PDF, Word) are accessible
- Provide captions and accessible formats for multimedia
- Maintain accessible navigation and usability

11. Digital Accessibility Implementation

The City will implement the following practices to ensure compliance:

a. Content Creation. Staff will create accessible documents, web content and social media posts.

b. Training. Staff responsible for publishing content will receive accessibility training.

c. Monitoring. The City will conduct periodic accessibility reviews of digital content.

d. Alternative Access. Accessible formats will be provided upon request in a timely manner.

e. Procurement. All third-party digital tools must provide a VPAT or Accessibility Conformance Report (ACR).

III. ATTACHMENTS

- A. Title VI of the Civil Rights Act of 1964 Section 2000d
- B. City of Lakewood Notice of Civil Rights
- C. City of Lakewood Title VI Complaint Form
- D. List of Transit Related Title VI Investigations, Complaints, and Lawsuits
- E. City of Lakewood Title VI Limited English Proficiency (LEP) Plan
- F. City of Lakewood Public Participation Plan
- G. City of Lakewood System-Wide Standards and Policies

ATTACHMENT A

Title VI of the Civil Rights Act of 1964 Section 2000d

Notifying the Public of Rights Under Title VI

City of Lakewood

City of Lakewood operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with City of Lakewood.

For more information on City of Lakewood civil rights program, and the procedures to file a complaint, contact (562) 866-9771, or visit City Hall at 5050 Clark Avenue, Lakewood. For more information, visit [The City of Lakewood Title VI Webpage](#).

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact (562) 866-9771

ATTACHMENT B

City of Lakewood Notice of Civil Rights

Title VI Notice to the Public

City of Lakewood

The City of Lakewood operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act.

The City also ensures that individuals with disabilities have equal access to its programs, services and activities, including those provided through digital platforms such as websites, online forms and electronic documents in accordance with the Americans with Disabilities Act (ADA).

Any person who believes they have been subjected to discrimination on the basis of race, color or national origin may file a complaint with the City of Lakewood.

Individuals who have encountered barriers to accessing City programs, services or digital content may also contact the City to request assistance or file a complaint.

Complaints may be submitted in the following ways:

Online: www.lakewoodca.gov/CivilRights

Email: ADACoordinator@lakewoodca.gov

Phone: 562-866-9771

In-person: City Hall, 5050 Clark Avenue, Lakewood, CA 90712 (during regular business hours)

By mail: City of Lakewood, City Manager's Office, 5050 Clark Avenue, Lakewood, CA 90712

For more information about the City of Lakewood civil rights program and complaint procedures, visit www.lakewoodca.gov/titleVI.

A complainant may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language or in an accessible format, requests may be made by phone at 562-866-9771, through the City's website (LINK) or by email at ADACoordinator@lakewoodca.gov. The City will provide reasonable accommodations and accessible formats in a timely manner upon request.

ATTACHMENT C

Civil Rights Complaint Form



City of Lakewood
Title VI Program

Sample Title VI Complaint Form (For Reference Only)

This form is provided as an example. To submit a complaint, please use the online reference complaint form or contact the City for assistance.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs receiving federal financial assistance.

In addition, the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability and requires that individuals with disabilities have equal access to City programs, services and activities, including those provided through digital platforms such as websites, online forms and electronic documents.

The following information is necessary to assist the City of Lakewood in processing a civil rights complaint. Complaints may include allegations of discrimination, denial of access to services or benefits or accessibility barriers in City programs, services or digital content.

Complaints may be submitted online, by phone, by mail or in person. Assistance is available upon request.

To submit the complaint form online, visit:
www.lakewoodca.gov/CivilRights

The form below is provided as an optional method for submitting a written complaint.

To request assistance in completing this form, please contact the ADA Coordinator Jose Gomez at 562-866-9771 or by email at ADACoordinator@lakewoodca.gov.

Completed forms may be submitted to: City of Lakewood, City Manager's Office, 5050 Clark Avenue, Lakewood, California 90712.

Complainant's Name: **[Enter Response]**

1. Address: **[Enter Response]**

2. City: **[Enter Response]**

State: **[Enter Response]**

Zip Code: **[Enter Response]**

3. Telephone Number (home): **[Enter Response]**

(cell): **[Enter Response]**

4. Email address: **[Enter Response]**

5. Person discriminated against (if someone other than the

Complainant): Name: **[Enter Response]**

Address: **[Enter Response]**

City: **[Enter Response]** State: **[Enter Response]** Zip Code: **[Enter Response]**

6. Which of the following best describes the reason you believe the discrimination took place? Check all that apply:

- Race
- Color
- National Origin
- Disability
- Sex
- Age
- Other (Please specify, such as religion or other protected status)

7. Type of issue (check all that apply)

- Discrimination in a City program or service (based on race, color, national origin or disability)
- Denial of access
- Accessibility barrier
- Contractor issue
- Other (please describe): **[Enter Response]**

8. What date did the alleged discrimination take place?
[Enter Response]

9. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use an additional sheet of paper if additional space is required.

[Enter Response]

10. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes: No:

If yes, please check each box that applies:

Federal agency Federal court State agency

State court Local agency

11. Please provide information about a contact person at the agency/court where the complaint was filed:

Name: **[Enter Response]**

Address: **[Enter Response]**

City: **[Enter Response]**

State: **[Enter Response]**

Zip Code: **[Enter Response]**

13. What would you like the City to do to resolve this issue?_

[Enter Response]

14. Do you need assistance, auxiliary aids or an alternative format to participate in this complaint process?

 Yes

 No

If yes, describe: **[Enter Response]**

12. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

[Signature Here]

Complainant's Signature

[Date Here]

Date

ATTACHMENT D

List of Title VI and Accessibility-Related Investigations, Complaints, and Lawsuits

City of
Lakewood

List of Title VI and Accessibility-Related Investigations, Complaints and Lawsuits

Action	Date (Month, Day, Year)	Type of Issue (Discrimination, accessibility barrier, denial of services, other	Summary (Basis of complaint: e.g., race, color, national origin, disability, or accessibility related issue)	Status
Investigations				
Lawsuits				

Complaints				
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This log includes complaints related to discrimination, denial of access or accessibility barriers in City programs, services or digital content.

This table reflects the status of complaints and investigations at the time of this report. The City maintains an internal log that is updated on an ongoing basis.

ATTACHMENT E

City of Lakewood Title VI Limited English Proficiency (LEP) Plan

CITY OF LAKEWOOD
TITLE VI LIMITED ENGLISH PROFICIENCY (LEP) PLAN
December 2022

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Lakewood' (City) transit responsibilities as a recipient of federal financial assistance as it relates to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 2012, which states that no person shall be subjected to discrimination on the basis of race, color, or national origin.

In August 2000, Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", was issued, proclaiming that differing treatment based on 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 their 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 Lakewood.

In addition to language access, the City recognizes the importance of ensuring that digital information and services are accessible to individuals with disabilities. The City is committed to providing accessible web content, documents and online services in accordance with the Americans with Disabilities Act (ADA) and applicable accessibility standards.

Background

The City administers the DASH transit program. Additionally, the Lakewood City Council is the policymaking body that provides policy direction for any service changes for the referenced transit program. In accordance with Title VI requirements, the City has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access the City's transit service. As defined by Executive Order 13166, "LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English."

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and procedures for notifying LEP persons that assistance is available. In order to prepare this plan, City staff implemented the United States Department of Transportation's (US DOT) 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 by or are likely to encounter the City's transit program, activities, or services.
2. The frequency with which LEP persons utilize City transit service program, activities, or services.
3. The nature and importance of programs, activities, or services provided by the City transit services to the LEP population.
4. Resources available to the City and overall cost to provide LEP assistance.

Four-Factor Analysis

In accordance with the factors outlined by the US DOT with regard to analyzing the need for an LEP program, staff completed a thorough review of each of the four factors to determine the scope of LEP services that the City will need to provide in order to be in compliance with Title VI requirements. The analysis, which is provided below, utilized the 2016-2020 American Community Survey Five Year Estimate from the United States Census Bureau to obtain demographic and language information that will be used in order to shape the development of the City's LEP program.

As required by the FTA, the City is required to include any group that exceeds 1,000 persons that speak English "less than very well", as part of the four-factor analysis. If the group contains less than 1,000 persons that speak "less than very well", then the City is not required to include this group of persons in its analysis.

FACTOR 1:

Number or proportion of LEP persons in the service area who may be served by or are likely to encounter City transit programs, activities, or services.

City staff reviewed Census Data from the United States Census Bureau.

Lakewood, California 2020 Census

	Counts	Percentages
Total Population	82,727	100.00%
American Indian and Alaska native alone	496	0.60%
Asian alone	15,718	19.00%
Black or African American alone	6,949	8.40%
Native Hawaiian and Other Pacific native alone	662	0.80%
Two or more races	8,025	9.70%
White alone	39,378	47.60%
Hispanic or Latino	28,210	34.10%

The 2020 United States Census reported that the City of Lakewood had a population of 82,727. The racial makeup of the City of Lakewood was 39,378 (47.6%) White, 6,949 (8.4%) African American, 496 (0.81%) American Indian and Alaska Native, 15,718 (19.0%) Asian, 662 (0.8%) Native Hawaiian and Pacific Native, and 8,025 (9.7%) from two or more races. Hispanic or Latino of any race was 28,210 (34.1%).

ACS Survey (2021)	Lakewood
Population 5+ years Speak only English	75,192
Spanish or Spanish Creole:	15,371
Speak English "very well"	65,904
Speak English less than "very well"	9,288

The table above is from the 2021 **American Community Survey** (ACS) that produces population, demographic and housing unit estimates. It is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties. The 2021 **American Community Survey** estimates states the

City of Lakewood estimated population 5 years and older was 75,192.

The American Community Survey (ACS) demonstrates the majority of residents speak English, either very well or less than very well. The second most-spoken language after English is Spanish. Approximately 20.4% of the total population of 5+ years old population speaks Spanish, the largest non-English language spoken within the City of Lakewood.

FACTOR 2:

The frequency with which LEP persons utilize Lakewood transit services programs, activities, or services.

As a result of the City of Lakewood’s diversity, the agency regularly encounters LEP individuals throughout its day-to-day operations. Accordingly, the City works to ensure that all individuals have access to vital information relating to programs and services provided by the City.

Below are examples of where some of the interactions may take place with LEP individuals:

- Recreation and Community Services Department
- Public Information Department
- Community Development Department
- Administrative Services Department
- Personnel Department
- Public Works Department
- Public Safety Department
- Community centers and park offices
- City Manager’s Office
- Website and social media pages
- Online forms and service portals
- Mobile-friendly access to City services
- Staffed booths at community events
- Community based organizations
- Public hearings

The City of Lakewood serves LEP persons daily via many of the listed services above. Since the majority of the LEP persons are Spanish- speakers, the City of Lakewood is staffed with Spanish- speaking personnel and resources to assist with LEP persons.

FACTOR 3:

The nature and importance of services provided by the City to the LEP population

As mentioned previously, the agency regularly encounters LEP individuals

throughout its day-to-day operations. Accordingly, the City works to ensure that all individuals have access to vital information relating to programs and services provided by the City. The above interaction points with LEP individuals allows the city to communicate the myriad of services that we provide.

FACTOR 4:

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

The City of Lakewood places an emphasis on providing vital information about its programs and services for its entire population, and recognizes the need to make these services available to its Spanish-speaking LEP population.

The City of Lakewood employs a number of full-time and part-time staff that are bilingual in English and Spanish and they receive a small monthly stipend per month. These employees are housed within several key departments in City Hall so that they can provide bilingual language services that covers broad requests.

While the City of Lakewood has not to date received a request for translation services in a language other than Spanish, the City would accommodate any reasonable request with a contracted language translation provider or through a referral to the 211 LA County language-assistance service line.

Language Assistance Measures

There are various ways in which the City of Lakewood responds to LEP persons, whether in person, by telephone, or in writing. These include, but are not limited to:

1. Post the City of Lakewood Title VI Policy and LEP plan on the City's website, in various languages, and in locations easily accessible by the public.
2. Translate vital documents into Spanish. Vital documents include but are not limited to: Civil Rights Notice, Complaint Procedures, etc.
3. When an interpreter is needed, in person or on the telephone, staff will attempt to access language assistance services from fellow employees.
4. Providing advance notice in various publications that interpreter services may be available for meetings, based on availability.

5. Staff Training: City employees will conduct training with appropriate personnel to review and update LEP policies and procedures, as appropriate. Training will include guidance on providing language assistance and ensuring accessible communication, including digital content.
6. Ensure that digital content, including websites, online forms and electronic documents, is accessible and compatible with assistive technologies such as screen readers and that translated materials are provided in accessible formats when requested.
7. The City's website includes a machine translation feature to assist users in accessing information in multiple languages. This tool is provided as a convenience and does not replace the City's obligation to provide meaningful access through translated materials, bilingual staff or interpretation services for vital information.

Any request for translation, interpretation, or other means of language assistance, for Title VI Program documents or forms, can be appropriately directed to the City of Lakewood City Manager's Office at 562-866-9771. Upon request, the City will provide translated materials or accessible formats, including assistance through interpretation services, accessible documents, or other reasonable accommodations, to ensure meaningful access to City programs and services.

Monitoring and Updating the LEP Plan

The City will update the LEP Plan as required by the US DOT. At a minimum, the plan will be reviewed and updated every three years, when data from the U.S Census is available, or when higher concentrations of LEP individuals are identified in the City's service area. Updates will include the following:

1. Documentation of LEP personal contacts.
2. How the needs of LEP persons have been addressed?
3. Estimations of the current LEP population in the service area.
4. Determination as to whether the need for translation services has changed.
5. Determine whether local language assistance programs have been effective and sufficient to meet the need.
6. Determine whether City financial resources are sufficient to fund language assistance resources needed.
7. Determine whether the City has fully complied with the goals of this LEP Plan.

ATTACHMENT F

Public Participation Plan

CITY OF LAKEWOOD PUBLIC PARTICIPATION PLAN

December 2022

The City is committed to ensuring that its projects, programs, and services, including opportunities for public participation offered both in person and through digital platforms, are accessible and inclusive of all community members. The City's encouragement of Public Participation promotes public involvement in the planning and decision-making process of projects, programs, and services.

As a recipient of Federal funding, the City is required to adhere to Title VI of the Civil Rights Act of 1964 and to integrate the Public Participation into its Title VI Program. This plan provides guidelines for involving the public to ensure that all groups are represented and their needs considered. The City 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 goal of the City's PPP is to offer a variety of opportunities for the public to engage in planning and decision-making activities. To meet this goal, the objectives of the PPP are as follows:

- To determine what non-English languages and/or other barriers may exist to public participation within the City service area.
- To provide a general notification of meetings for public input, in a manner that is understandable to all populations in the service area.
- To ensure that public participation opportunities, including meetings, online engagement and digital content are accessible to individuals with disabilities and limited English proficiency.
- To hold meetings in locations that are accessible and reasonably welcoming to all residents, and to provide accessible virtual participation options where applicable, including captioning or other accommodations upon request.
- To utilize a variety of communication methods to capture public input from populations that are not likely to attend or engage in public meetings.

Stakeholders

Limited English Proficiency Populations

A LEP individual is someone with limited ability to read, write, speak, or comprehend English. Reasonable efforts will be made to engage LEP populations utilizing techniques, such as the development of public notices in appropriate non-

English Languages that will provide contact information where individuals can be informed of the affected project or services to provide input and comments. In addition, non-profit organizations and other advocacy groups can be utilized to disseminate and provide insight into the needs of LEP populations.

Low-Income Populations

The City will identify low-income populations within the service area. The low-income threshold will be defined as households with a per capita income of 80 percent or less of the national average. Low-income populations in the City will be given reasonable opportunity to provide input on plans and programs to avoid disproportionate harm or lack of benefit.

Public Comment Process Offered by the City Council

The public has a right to express their opinion during the regular Council meetings held. The meetings are held in the Council Chambers at 5050 Clark Avenue, Lakewood 90712. Information about the City Council is available on the City website at:

<https://www.lakewoodca.gov/Government/Council-Members/City-Council-Meetings-Minutes-Agendas>

Information about how to participate, including accessible participation options, is available on the City's website.

Outreach Efforts

Engaging minority and LEP populations can be challenging and the City will use multiple techniques to actively solicit policy input in the planning process for a project. The City will engage the community through the City's website, social media, Lakewood Living Magazine, and surveys.

The City will also ensure that digital outreach methods, including websites, online surveys and social media are accessible and provide meaningful opportunities for participation for individuals with disabilities and limited English proficiency.

Appropriate techniques among the following will be used to inform, educate, and gain input from the public about the City's projects, services, or activities:

- Surveys or questionnaires - mail-in, online, telephone,
- Articles in the appropriate publications
- Distribution of informal reports, flyers, or brochures
- Informal presentations at community forums
- Information about meetings, public hearings, and special events on the City's website

- General mailings to residents

Individuals who require language assistance or reasonable accommodations to participate in public meetings or provide input may request assistance by contacting the City. The City will make reasonable efforts to provide accommodations in a timely manner.