


# PROPOSED “NEW” ADMIN REG

## 10/31/2024

 <p style="text-align: center;"><b>ORANGE COUNTY ADMINISTRATIVE REGULATIONS</b></p>	No.: <b>NEW</b>
	Date:
	Approved By:
Title: <b>LANGUAGE ASSISTANCE SERVICES – TITLE VI LIMITED ENGLISH PROFICIENCY PLAN</b>	Page 1 of 5

### I. POLICY

In compliance with Title VI of the Civil Rights Act of 1964, all County employees shall protect and safeguard the right and opportunity of all individuals to be free from all forms of discrimination, including discrimination based on national origin and shall ensure that persons who have a limited proficiency in English are not discriminated against or denied the opportunity for meaningful access to and participation in County programs, services, and activities. Persons who have limited proficiency in English are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such persons are eligible to receive language assistance to understand a particular service, benefit, or encounter. In accordance with federal Executive Order 13166 and its implementing guidance, the County has taken reasonable steps to ensure meaningful access to programs and activities by persons who have limited proficiency in English.

#### A. Background

In accordance with certain federal requirements, the County adopts a Title VI Limited English Proficiency Plan triennially, as part of the Orange County Title VI Nondiscrimination Policy and Plan. The Limited English Proficiency Plan (also referred to as “LEP Plan”) sets forth the County’s determinations of the extent to which residents of the County require language assistance services and the language assistance services that the County will provide. The Limited English Proficiency Plan is located on the Title VI webpage of the Orange County website.

#### B. Scope of Limited English Proficiency Plan

Through the Limited English Proficiency Plan, the County has established resources and tools to assist persons with limited proficiency in English in accessing the County’s programs, services, and activities. Those resources and tools include the following:

1. Oral interpretation;
2. Translation of written documents;
3. “I Speak” cards; and
4. Notices in English and Spanish.



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For purposes of this policy and its implementing procedures, the following definitions apply:

*Bilingual Staff:* Persons who are fluent in two languages, including those who are fluent in agency terminology and, therefore, able to conduct the business of their workplace in both languages.

*Competent Translators:* Persons who possess competence in providing for the linguistic, cultural, factual, and technical information in the replacement of written text from one language (source language) into an equivalent or best matching written text in another language (target language).

*Interpretation:* The act of listening to something in a source language and orally translating it into a target language.

*Competent Interpreters:* Persons who possess competence in listening with understanding of the linguistic, cultural, factual, and technical information in a source language and orally translating such information into a target language with competence in conveying the linguistic, cultural, factual, and technical information into the target language.

*Translation:* The replacement of written text from a source language into an equivalent or best matching written text of a target language.

*LEP persons:* Persons who do not speak English as their primary language, who have a limited ability to read, write, speak, or understand English, and who are eligible to receive language assistance to understand a particular service, benefit, or encounter.

*Vital Documents:* Documents that contain information on individual rights and vital services, programs, and activities provided by the County and that have been classified as vital documents pursuant to the LEP Plan.

C. Responsibilities, powers, and duties of Title VI/Nondiscrimination Coordinator

The Title VI/Nondiscrimination Coordinator is responsible for oversight and implementation of the Limited English Proficiency Plan and shall exercise the powers and duties set forth in the County's Title VI Nondiscrimination Policy and Plan, and as otherwise assigned.

II. PROCEDURES

A. General guidelines. Department directors shall ensure that all County divisions have appropriate language assistance resources and appropriate staff training to use language assistance



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resources. To provide appropriate language assistance resources for each division, department directors shall consider the following four factors (“four factor analysis”):

1. Number and proportion of LEP persons served;
2. Frequency of interactions with LEP persons;
3. Nature and importance of program; and
4. Resources available.

B. Oral interpretation. Department directors shall guide division managers in applying the *four factor analysis* to determine the appropriate resources to provide oral language assistance services. The following resources shall be considered and utilized if determined appropriate for oral language assistance:

1. “I Speak” cards;
2. County’s 311 service for language interpretation;
3. Bilingual staff;
4. Competent contract interpreters;
5. Telephone interpreter lines;
6. Community volunteers; and
7. Family members and friends of the LEP person, in limited circumstances.

C. Written Translation. Department directors shall guide division managers in applying the *four factor analysis* to evaluate translated documents and to prepare the translation of additional vital documents.

Prior to board and committee meetings, workshops, and public hearings, County staff shall provide notification of the availability of language assistance services, free of charge, on the County’s website, within meeting notices, and on each agenda in English, Spanish, and Haitian Creole. County staff shall provide meeting notices in other languages, as deemed appropriate for meetings involving a significantly large group of LEP persons who speak a language other than Spanish and Haitian Creole. County staff shall determine the need for additional notification to LEP persons by considering the nature of the meeting or event.

The standard notice of the availability of language assistance services shown on the County’s website, newsletters, and other general announcements shall be substantially in the form shown below, and updated as the listed contact information is changed from time to time:

*Orange County does not discriminate on the basis of race, color, national origin, sex, age, religion, disability or family status. Those with questions or concerns about nondiscrimination, those requiring special assistance under the Americans with Disabilities Act (ADA), and those requiring language assistance (free of charge) should contact the Title VI/Nondiscrimination Coordinator at [access@ocfl.net](mailto:access@ocfl.net) or by calling 3-1-1*



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(407-836-3111).

*El Condado de Orange no discrimina por motivos de raza, color, origen nacional, sexo, edad, religión, discapacidad o situación familiar. Aquellos que tengan preguntas o inquietudes sobre la no discriminación, aquellos que requieran asistencia especial según la Ley de Estadounidenses con Discapacidades (ADA) y aquellos que requieran asistencia lingüística (gratuita) deben comunicarse con el Coordinador de No Discriminación/Título VI en [access@ocfl.net](mailto:access@ocfl.net) o llamando 3-1-1 (407-836-3111).*

*Orange County pa fè diskriminasyon sou baz ras, koulè, orijin nasyonal, sèks, laj, relijyon, andikap oswa sitiyaasyon fanmi. Moun ki gen kesyon oswa enkyetid konsènan non diskriminasyon, moun ki bezwen asistans espesyal dapre Lwa Ameriken andikape yo (ADA), ak moun ki bezwen asistans nan lang (gratis) ta dwe kontakte Kowòdonatè Tit VI/Nondiscrimination nan [access@ocfl.net](mailto:access@ocfl.net) oswa lè yo rele 3. -1-1 (407-836-3111).*

To solicit requests for language assistance prior to an event, such as a community meeting, County staff shall modify the above-referenced standard notice form as follows:

*Public participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or family status. Persons who require special accommodation under the Americans with Disabilities Act (ADA), and those requiring translation services (free of charge) are asked to contact the Title VI Nondiscrimination Coordinator no less than (10) days before the event at [access@ocfl.net](mailto:access@ocfl.net) or by calling 3-1-1 (407 -836-3111).*

*Se solicita la participación del público sin distinción de raza, color, origen nacional, edad, sexo, religión, discapacidad y situación familiar. Las personas que requieran adaptaciones especiales según la Ley de Estadounidenses con Discapacidades (ADA), y aquellas que requieran servicios de traducción (sin cargo), deben comunicarse con el Coordinador de No Discriminación del Título VI al menos (10) días antes del evento en [access@ocfl.net](mailto:access@ocfl.net) o llamando al 3-1-1 (407-836-3111).*

*Nap mande patisipasyon piblik la san konsiderasyon ras, koulè, orijin nasyonal, laj, sèks, relijyon, andikap oswa sitiyaasyon fanmilyal. Moun ki bezwen asistans espesyal dapre Lwa Ameriken pou Andikape yo (ADA), ak moun ki bezwen èd nan lang (gratis) dwe kontakte Kowòdonatè Tit VI/Non-diskriminasyon an pa mwens ke (10) jou anvan evènman an nan [access@ocfl.net](mailto:access@ocfl.net). oswa yo ka rele 3-1-1 (407-836-3111).*



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D. **Complaint Procedures.** The County has established a nondiscrimination complaint procedure in the LEP Plan and will take prompt and reasonable action to investigate and eliminate discrimination. Upon receipt of a complaint from a person who complains that he or she has been subjected to discrimination based on race, color, national origin, sex, age, disability, religion, income, or familial status in any of the County's programs, services, or activities, County staff shall inform that person of the opportunity to file a complaint with the County's Title VI/Nondiscrimination Coordinator in writing at Orange County Administration, 201 South Rosalind Avenue, Orlando, FL 32801, in person, or via U.S. mail, or in any other manner specified in the LEP Plan. The Title VI/Nondiscrimination Coordinator shall receive, process, and investigate complaints in accordance with the procedures outlined in the LEP Plan.

E. **Staff Training.** The designated Title VI/Nondiscrimination Coordinator, with support of all department directors, shall share the LEP Plan and associated guidance with all departments and shall conduct LEP training for each department as provided in the LEP Plan. The scope and depth of LEP training shall depend upon the frequency of each department's and each division's interaction with LEP persons.

F. **Annual Report and Update on Title VI Nondiscrimination Efforts.** Each year, the Title VI/Nondiscrimination Coordinator shall present an annual Title VI LEP Update to the Board of County Commissioners. The Annual Title VI LEP Update shall include an inventory of LEP services, activities, and programs provided during the preceding year.

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**FOR MORE INFORMATION CONTACT:**

Orange County Title VI/Nondiscrimination  
Coordinator

**REFERENCES:**

Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d et seq. 78 stat. 252; Executive Order No. 13,166, 65 Fed. Reg. 50,121 (Aug. 16, 2000); Orange County Resolution 2022-M-11 adopting Orange County Title VI Nondiscrimination Policy and Plan (April 2022)