

RESOLUTION

of the
ORANGE COUNTY BOARD OF COUNTY COMMISSIONERS

regarding
THE ADOPTION OF THE ORANGE COUNTY
NONDISCRIMINATION POLICY AND PLAN FOR COMPLIANCE
WITH THE CIVIL RIGHTS ACT OF 1964, SECTION 504 OF THE
REHABILITATION ACT OF 1973, AND OTHER
NONDISCRIMINATION AUTHORITIES

RESOLUTION NO. 2019-M-18

WHEREAS, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and other nondiscrimination authorities (Authorities) require that “no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any federally-funded program, policy, or activity on the basis of race, color, national origin, disability, religion, income, sex, age, or familial status”; and

WHEREAS, Orange County has previously adopted Resolutions No. 2014-M-07 and 2016-M-10 to address ADA compliance and completed and posted an Americans with Disabilities Act (ADA) Transition Plan for the accessibility of pedestrian facilities within public rights-of-way, as approved by the Orange County Board of County Commissioners; and

WHEREAS, Orange County is a recipient of federal-aid highway and other program funds and is in the process of recertifying as a Florida Department of Transportation (FDOT) Local Agency Program (LAP) Certified County; and

WHEREAS, LAP Recertification requires the submittal of a Sub-Recipient Compliance Assessment Tool (SCAT) to the FDOT; and

WHEREAS, the LAP SCAT requires that the County adopt by resolution (the “Resolution”) a written Title VI Nondiscrimination Policy and Plan which establishes the

County's nondiscrimination policy statement, complaint filing procedures, outreach to advise the public of nondiscrimination policies and obtain input, and other assurances to certify to the FDOT and Federal Highway Administration (FHWA) that the County's programs, services, and activities are being conducted in a nondiscriminatory manner; and

WHEREAS, Orange County will continue to build public facilities and infrastructure in compliance with ADA standards, to make reasonable accommodations to allow persons with disabilities to access county facilities, and to comply with Title II of the ADA through implementation of the County's ADA Transition Plan for the construction and repair of sidewalks, curb ramps, and other facilities within public-rights-of-way; and

WHEREAS, the Title VI Nondiscrimination Policy and Plan must be noticed and made available to the general public following adoption and be recertified to the FDOT and FHWA every three (3) years.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF ORANGE COUNTY (the "BCC"):

Section 1. The foregoing premises are incorporated herein and are found to be fair and accurate statements.

Section 2. Orange County hereby adopts this Resolution to effectuate the nondiscrimination policy statement, protocols, processes, and procedures as outlined in the attached Title VI Nondiscrimination Policy and Plan (the "Plan"). The Plan includes the County's Title VI/Nondiscrimination Policy, Title II ADA Compliance Statement, complaint procedures, and provisions to assist Limited English Proficiency persons.

Section 3. A copy of this Resolution shall be attached to such aforementioned Title VI Nondiscrimination Policy and Plan.

ADOPTED THIS _____ DAY OF APR 23 2019, _____.



ORANGE COUNTY, FLORIDA
By: Board of County Commissioners

By: *Byronne Brooks*
for Jerry L. Demings
County Mayor

ATTEST: Phil Diamond, CPA, County Comptroller
As Clerk of the Board of County Commissioners

By: *Katie Smith*
Deputy Clerk

Title VI Nondiscrimination Policy and Plan

Policy Statement:

Orange County, Florida (the "County") values diversity and welcomes input from all interested parties, regardless of cultural identity, background or income level. Moreover, the County believes that the best public policy and governmental services result from careful consideration of the needs of all of its communities and when those communities are involved in the public policy and governmental services decision-making process. Thus, the County does not tolerate discrimination in any of its programs, services, or activities. Pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. (Title VI, and related laws and regulations), and Orange County, Florida Regulations and Standard Operating Procedures, the County will not exclude from participation in, deny the benefits of, or subject to discrimination any person on the grounds of race, color, national origin, sex, age, disability, religion, income, or family status.

Complaint Procedures:

The County has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been subjected to discrimination based upon race, color, national origin, sex, age, disability, religion, income, family status, or other reason in any of the County's programs, services, or activities may file a complaint with the County Title VI/Nondiscrimination Coordinator by visiting www.orangecountyfl.net, Residents tab, Open Government, Title VI.

The written complaint should contain the identity of the complainant; the basis for the allegations (i.e., race, color, national origin, sex, age, disability, religion, income, family status, or other reason); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, or if the complainant is Limited English Proficient (LEP), the complainant may phone 3-1-1 (407-836-3111) for assistance.

The Title VI/Nondiscrimination Coordinator will respond to the complaint within sixty (60) days and, if the complaint is directly related to use of state pedestrian or transportation facilities, notify the Florida Department of Transportation (the "FDOT") in accordance with the FDOT LAP Program Manual. The County will promptly take reasonable steps to resolve the matter. Should the County be unable to resolve the complaint to the satisfaction of the complainant, the Title VI/Nondiscrimination Coordinator will forward the complaint, along with a record of its disposition, to the appropriate federal and/or state agency(ies) for further processing. Additionally, the Title VI/Nondiscrimination Coordinator shall maintain a record of every complaint and whether the complaint was resolved at the County level or forwarded for resolution.

The County's Title VI/Nondiscrimination Coordinator has easy access to the County Administrator and is not required to obtain management or other approval to discuss discrimination issues with the County Administrator. However, should the complainant be unable or unwilling to complain to the County, or if the complainant is dissatisfied with the County's handling/ resolution of a complaint, the written complaint may be submitted directly to the U.S. Department of Justice (DOJ) for assignment to the correct Federal or State authority for processing at:

U.S. Department of Justice
Civil Rights Division
Federal Coordination and Compliance Section, NWB
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Title VI Hotline: 1-888-TITLE-06 (1-888-848-5306) (Voice / TTY)
<http://www.justice.gov/crt/about/cor/coord/titlevi.php>

The County will cooperate with any ensuing investigation by, for example, making information available for inspection and cooperating with onsite visits and witness interviews.

ADA/504 Statement:

Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA), and related federal and state laws and regulations

forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their needs are equitably represented in County programs, services, and activities.

The County will comply with Title II of the ADA through implementation of its ADA Transition Plan for the construction and repair of sidewalks, curb ramps, and other facilities within public-rights-of-way. Additionally, the County will make reasonable efforts to ensure that its facilities, programs, services, and activities are accessible to those with disabilities.

The County encourages the public to report any facility, program, service, or activity that appears inaccessible to the disabled. Furthermore, the County will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services, or activities. Because providing reasonable accommodation may require outside assistance, organization(s), or resources, the County asks that requests be made at least seven (7) calendar days prior to the need for accommodation.

Questions, concerns, comments, or requests for accommodation should be made by emailing: Access@ocfl.net. The email should contain the identity of the complainant and a description of the question, concern, comment, or request for accommodation. If an email cannot be submitted electronically, or if the complainant is Limited English Proficient (LEP), the complainant may phone 3-1-1 (407-836-3111) for assistance.

Limited English Proficiency Plan

Introduction and Background

Based on United States Census data, most individuals living in Orange County read, write, speak, and understand English; however, there are many individuals for whom English is not their primary

language. If these individuals have a limited ability to read, write, speak, or understand English, they are limited English proficient, or “LEP.” Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable regulations and responsibilities, or understanding other information provided by publicly funded programs, activities, and services.

In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities with limited English proficiency to participate in or benefit from federally funded programs and services violates the “Title VI Prohibition Against National Origin Discrimination” of the Civil Rights Act of 1964 and other nondiscrimination authorities. Executive Order 13166 from the U.S. Department of Justice (US DOJ) and U.S. Department of Transportation (US DOT) outlines requirements and provides directives regarding Title VI prohibition against national origin discrimination on affected LEP persons. Executive Order 13166, which was signed in 2000, requires recipients of federal funds to: (1) examine programs, activities, and services that they provide, (2) identify specific needs for providing meaningful access for limited English proficiency (LEP) persons, and (3) implement a program or system to ensure meaningful access to such programs, activities, and services.

To ensure opportunities for meaningful access to programs, activities, and services to its LEP citizens, Orange County has conducted a self-assessment (the “Self-Assessment”) in accordance with the US DOJ LEP Guidance document (“DOJ Guidance”) and developed its Limited English Proficiency Plan which addresses Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities. This Plan follows closely the methodology used by MetroPlan Orlando (MPO) in the development of its Limited English Proficiency Plan and includes definitions found in the MPO LEP Plan. Orange County’s assessment, which is detailed in Part A of this Plan, includes an evaluation of:

- Relevant demographic information for Orange County,
- Frequency of contact that the County has with LEP persons,
- Nature and importance of programs and services deemed vital, and
- Resources and associated costs of providing LEP services.

The second part of the Plan, Part B, documents the County's Language Assistance Plan. Using the results of the Self-Assessment, the County will identify LEP needs and resources available to provide meaningful access. The Plan will also identify the County's current efforts in providing meaningful access.

The County's Limited English Proficiency Plan works in concert with the County's overall *Title VI Nondiscrimination Policy and Plan* as most recently adopted by County Resolution #2019 - _____. It is the policy of the Orange County Board of County Commissioners that the County 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." It is also the policy of this Board to ensure that persons with limited English proficiency are not discriminated against or denied the opportunity for meaningful access to and participation in County programs, services, and activities.

Scope of the Limited English Proficiency Plan

Orange County's Limited English Proficiency Plan shall specifically apply to Limited English Proficiency Persons, defined below.

Definitions

- **Limited English Proficiency Persons:** Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered Limited English Proficient "LEP."
- **Recipient of Federal Financial Assistance:** Entities, including local governments, that receive federal financial assistance, including grants, training, use of equipment, donations of surplus property, and other assistance, are considered recipients. Entities receiving financial assistance from a recipient are considered sub-recipients and are also subject to the requirements of Title VI.
- **Vital Communication:** The DOJ Guidance provides that "a document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law. Vital documents include, for example: applications, consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rulebooks; written tests that do not assess

English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client.” As an example, if a complaint form is necessary in order to file a claim with an agency, that complaint form would be vital. US DOJ also provides that vital documents must be translated when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For larger documents, translation of vital information contained within the document will suffice, and the large documents do not need to be translated in their entirety. The County is conducting a survey of its various departments and divisions to determine what it deems vital communication relative to its programs, activities, and services.

- Interpretation: Interpretation involves the communication of meaning from one language (the source language) into another (the target language). It is the act of actively listening to spoken words from the source language and orally or verbally translating the words into the target language in such a way that fully and accurately conveys or best matches the meaning of the source language.
- Translation: The replacement of a written text from one language (the source language) into an equivalent or best matching written text in another language (the target language).
- 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.

Complaint Procedure

The County has established a nondiscrimination procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes 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 may file a complaint with the County Title VI/Nondiscrimination Coordinator in writing at **Orange County Human Resources, 450 E. South Street, Orlando, FL 32801**, in person, or via US mail.

The written complaint should contain the identity of the complainant, the basis for the allegations, and a description of the alleged discrimination with the date of the occurrence. The information and form will be available in English, Spanish, and Haitian Creole.

The Title VI/Nondiscrimination Coordinator will respond to the complaint within sixty (60) days and will take reasonable steps to resolve the matter. Should the County be unable to satisfactorily resolve the complaint, the Title VI/Nondiscrimination Coordinator will forward the complaint, along with the record of its disposition, to the appropriate federal and/or state authority for further processing.

For persons included in a regularly encountered Limited English Proficiency group, based on the Self-Assessment in Part A, the County shall provide written notification of the opportunity to file a discrimination complaint in accordance with federal regulations at www.orangecountyfl.net ,

Residents, Open Government, Title VI.

For infrequently encountered groups, LEP persons may be advised orally of the opportunity to file a discrimination complaint pursuant to federal regulations. Based on the Self-Assessment, complaint forms shall be provided in English, Haitian Creole, and Spanish (a copy of the forms can be found in Appendix A).

Staff Designation

Orange County has designated Ricardo Daye, Director of County's Human Resources Department, as Title VI/Nondiscrimination Coordinator and as the individual responsible for oversight and implementation of the Limited English Proficiency Plan; the current information for this individual is noted immediately below. Responsibilities include coordinating and facilitating delivery of related services, staff training on the Plan's policies and procedures, and ongoing monitoring and assessment of the Plan's effectiveness.

Ricardo Daye, Director, Human Resources Department
Title VI/Nondiscrimination Coordinator
Orange County Government
450 E. South Street
Orlando, Florida 32801
(407) 836-5825
Access@ocfl.net

Part A: Self-Assessment

Pursuant to Executive Order 13166 and Federal Register 41459, Orange County is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons. The U.S. DOJ LEP Guidance provides four (4) factors that recipient agencies should consider and balance to determine the extent of their obligations to provide LEP services.

Factor One: Demography

The first part of the County's self-assessment involved collecting data on the number of limited English proficiency (LEP) persons eligible to be served, likely to be served, or likely to be encountered by the County through the County's programs, services, or activities. The County utilized the 2013-2017 America Community Survey (ACS), which is compiled by the U.S. Census Bureau.

Based on an assessment of the ACS data, the total County population is 1,209,706 persons (5 yrs. and older) and among those, 159,885 persons, approximately 13.2%, reported that they can speak English "less than very well" (Table 1 and Map 1). The self-assessment also revealed that there are nearly 40 languages spoken within Orange County and that the most frequently occurring language is Spanish or Spanish Creole (9.5% of the total population), followed by French, Haitian, or Cajun Creole (1.3 % of the total population) (Table 2). An analysis of Table 2 reveals that a majority of LEP persons are Spanish speakers.

Table 1: PERSONS SPEAKING ENGLISH "LESS THAN VERY WELL" (AGE 5+)

Total Population	Population Speaking English Less Than Very Well	Percent of Total County Population
1,209,706	159,885	13.2%

Table 2: ENGLISH LANGUAGE PROFICIENCY IN ORANGE COUNTY

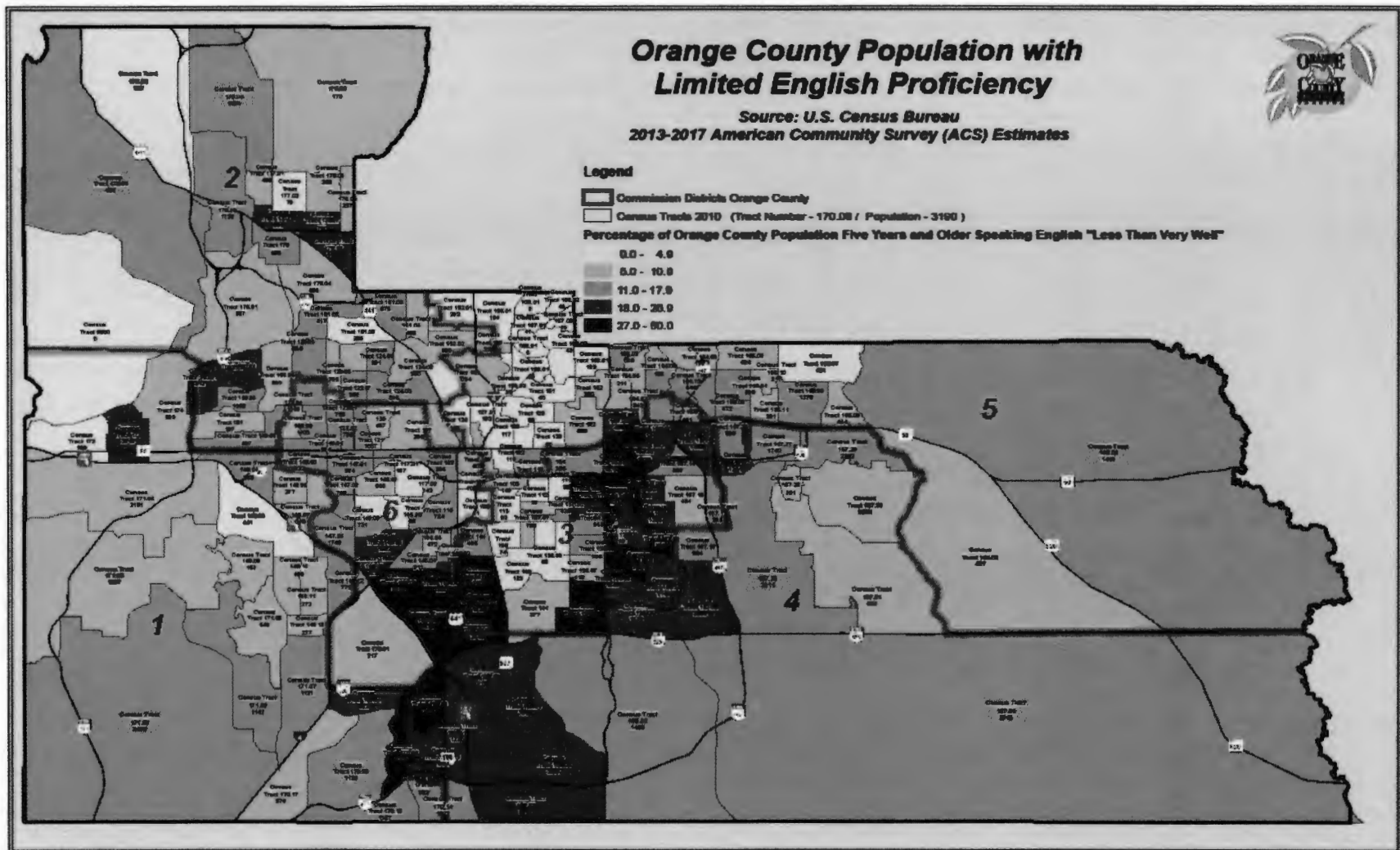
Language Spoken	Specific Population	Persons Speaking English Less Than Very Well	% of Language-Speaking Population Qualifying as LEP
Spanish or Spanish Creole	298,211	114,803	38.5%
French, Haitian, or Cajun Creole	43,984	15,968	36.3%
Other Indo-European Languages	29,839	9,803	32.9%
Vietnamese	11,186	6,120	54.7%
Chinese (incl. Mandarin, Cantonese)	8,429	4,441	52.7%
Tagalog (incl. Filipino)	6,992	2,319	33.2%
Other Languages	28,804	6,431	22.3%
TOTAL:	427,445	159,885	37.4%
Total County Population (5 Yrs and Older):	1,209,706		
Percent of Total County Population Speaking English Less Than Very Well	13.2%		

Source: Language Spoken at Home for the Population 5 Years and Over (Table C16001),
2013-2017 American Community Survey 5-Year Estimates

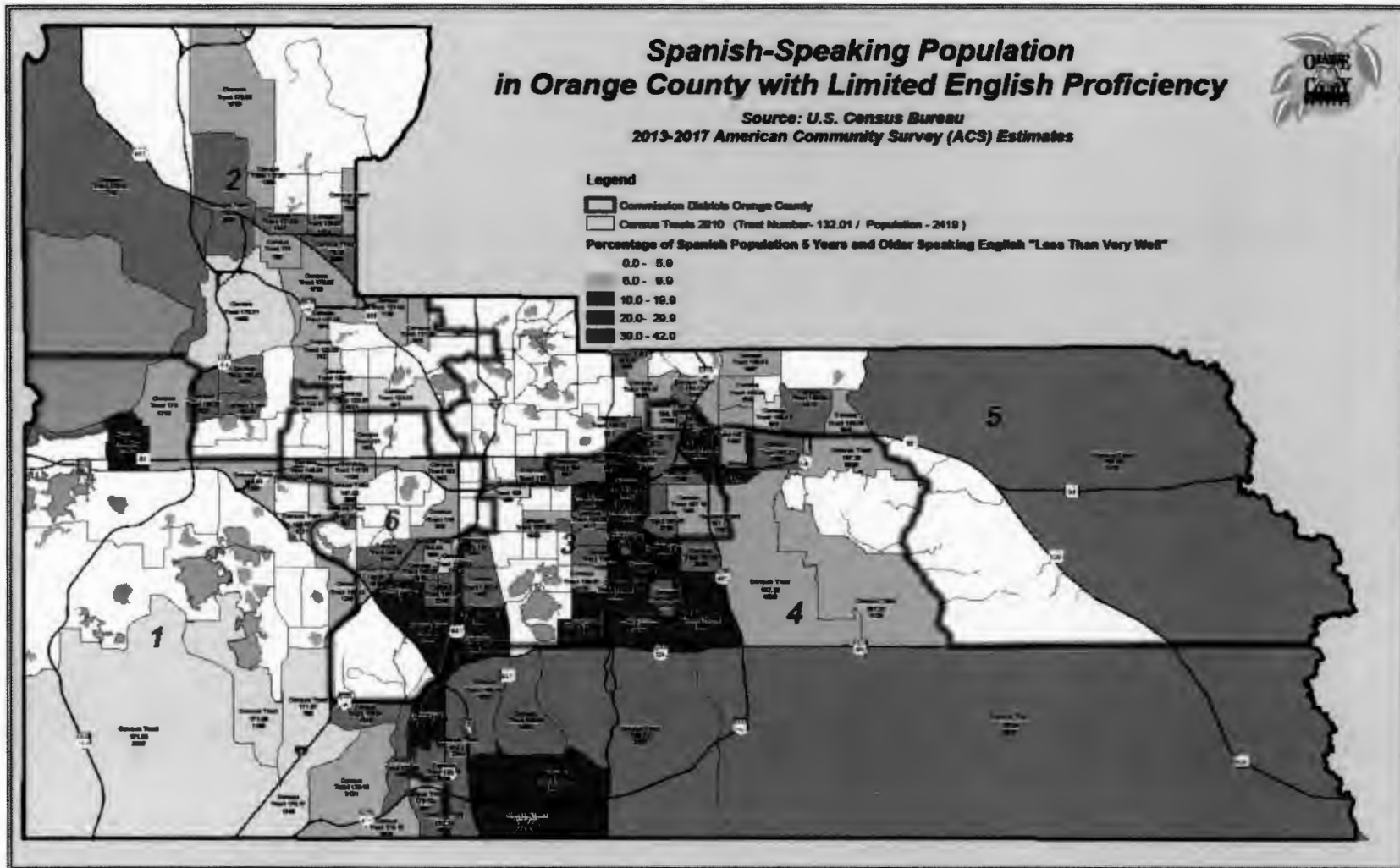
Based on the above analysis, Orange County recognizes the need to provide vital communication and information in Spanish/Spanish Creole.

The following maps (1-3) detail the populations with limited English proficiency in Orange County using Census Tracts, and the two largest statistical demographic groups: Spanish-speaking and Haitian Creole-speaking.

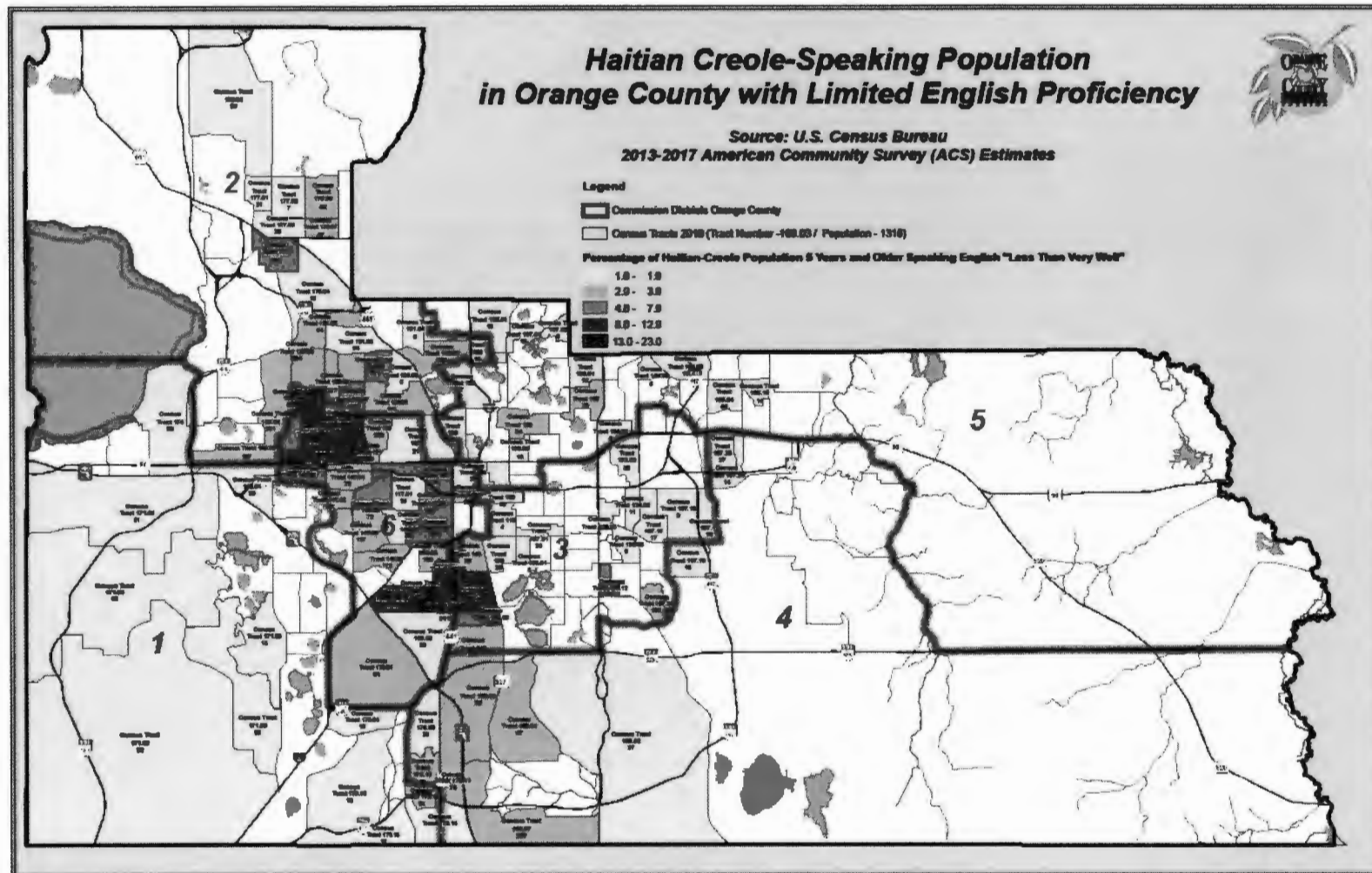
Map 1: ORANGE COUNTY POPULATION WITH LIMITED ENGLISH PROFICIENCY



Map 2: SPANISH-SPEAKING POPULATION WITH LIMITED ENGLISH PROFICIENCY



Map 3: HAITIAN CREOLE-SPEAKING POPULATION WITH LIMITED ENGLISH PROFICIENCY



Factor Two: Frequency of Contact

In addition to the regular public hearings, board meetings, and various committee meetings that Orange County has throughout the year, community meetings about County projects and other public outreach events remain the primary source for contact (or potential contact) with the general public, including LEP persons. However, as participation is discretionary, it is difficult to anticipate the participation or attendance of LEP persons at these types of events'; thus, it is difficult to assess or determine the frequency of contact with LEP persons. Additionally, contact occurs through daily transactions, such as the building permitting process, and less common interactions, such as contact with our Corrections Department and natural disaster preparation and response.

Based on interviews with County Departments, the County has found that frequency of contact with LEP persons is dependent upon the types of service provided. For instance, from January 2016 to January 2019, the Orange County Fire Rescue Department reported that .84% of its calls/requests for assistance (5,581 of 660,083 calls) were from persons requiring interpretation assistance. Even with low LEP call volumes, Fire Rescue continues to provide various emergency safety brochures (e.g. hurricane preparedness, fire escape planning, etc.) in both English and Spanish. In addition, Orange County provides language interpretation services at nine (9) "Orange County Public Safety Answering Points (PSAPs)" which are paid through the 911 special revenue fund. Orange County's non-emergency help and information service (phone/web chat/online request/smartphone app) reported 4,231 language assistance requests between January and December 2018, of which 4,170 needed Spanish language assistance. The Family Services Department reports that they interact quite frequently with Spanish speakers and have provided notice of their programs/events in a Spanish newspaper.

Because of this uncertainty, the County will continue to monitor its contact with LEP persons and track the frequency of contact. Additionally, the County will: 1) provide public notice regarding its new Limited English Proficiency Plan and Language Assistance Plan, 2) identify those communications/materials that the County deems vital based on programs and services provided, and 3) update its implementation timeframe to make such vital communications and materials available in Spanish.

Factor Three: Nature or Importance of Programs, Services and Activities

The County conducted a “vital communications” survey, with all departments participating, to identify the programs, services, and activities provided by the County to evaluate their associated public outreach/awareness efforts. Based on the survey, the “most popular or most frequently used programs, activities, or services” include:

- *Transportation* (including roadways, sidewalks, intersections, and traffic signalization)
- *Housing* (Section 8 Voucher Program, Community Development Block Grant, HOME Investment Partnership Program, Emergency Solutions Grants, State Housing Initiative Program)
- *Parks, Trails and Environment* (e.g. Surface Transportation Program for trails, Parks Release forms, and Clean Air Action Grant, Public Meeting Notices)
- *Health Services* (e.g. Drug Free education, prevention, treatment, training and other resources, Law Enforcement Compliance checks, and DUI saturation party patrols)
- *Corrections* (e.g. State Criminal Alien Assistance Program – SCAAP, Offender Connect DSI/ITI Form)
- *Family Services* (i.e. LIHEAP Utility Assistance, Head Start, Community Services Block Grant, Weatherization Program)

The survey also revealed that there are several County programs/departments, to include Utilities, Fire Rescue and Communications, that provide language assistance services to its customers. Since these services, programs, and activities impact Orange County citizens, including LEP persons, the County places a primary priority on providing language assistance relative to notifications, changes, and updates regarding these programs, services, and related public hearing/meeting notices. The County will continue to maintain its Spanish language portal and provide interpretation services, as requested, on a case by case basis.

Factor Four: Resources

Through the feedback received from the “vital communications survey,” the County has determined that “the most frequently requested or used outreach/resource materials” for informing the general public of programs, services, and activities include: brochures, newsletters, press releases/announcements, reports and individual rights written materials. In addition, the feedback indicates that a number of different forms are used by the various departments on a regular basis, many of which are updated as needed or updated on an annual basis. The survey suggests that there is a large volume of outreach/education materials and resources that are not currently translated for each of the programs, services, and activities within the county. Translation of these communications into Spanish shall have a secondary priority and shall be completed as funds and resources are allocated towards their completion.

Currently, newspaper ads, newsletters and other public meeting announcements are either translated in-house by bilingual staff or notated with a Spanish-speaking point of contact to ensure meaningful access to LEP persons. Additionally, Orange County’s Communications Division has begun tracking requests for translation services in order to determine language services costs.

The results of the vital communications survey were presented to senior management for direction on how to proceed with translation efforts. Costs are determined by the type and scope of services provided and, as such, may result in many of the County’s resources or services listed as “indeterminable” until a specific project is identified.

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Resources and Associated Costs

Resource	Associated Cost	Application
Translation (Spanish)	Indeterminable	Spanish translation services for standard County forms and documents.
Interpretation Services	Indeterminable	County will provide language assistance services as appropriate for public meetings.
Website Portal	Indeterminable	Current Spanish language website portal is incorporated into current website maintenance and design management.
Notices (ads, flyers, newsletters, outreach materials informing the public about meetings, events, changes in services/ programs, etc.)	Indeterminable	Notification of available free language services to LEP persons is included within meeting notices advertised in the Orlando Sentinel and El Sentinel newspapers. Notices are also provided on the County's website and other outreach materials developed for the meetings, events, and public hearings.
"I Speak" Cards	Printing costs, variable	"I Speak" language cards will be made available at public hearings and meetings and other events to identify individuals with limited English proficiency in order to provide language assistance. This effort will also assist the County in monitoring changing demographics to better anticipate future needs.
311 Customer Service	Indeterminable	Currently, operators of the 311 Customer Service Center patch in translators as needed when requests are made. The County will compile and maintain an updated list of bilingual staff who are able to provide language assistance.
911 Language Line	Variable	The County contracts to provide language assistance when a caller dials 911 for emergency assistance.

Part B: Orange County Language Assistance Plan

Orange County's Language Assistance Plan (LAP) is intended to provide an implementation process to address appropriate language needs within the County as identified in the Self-Assessment.

Orange County's Commitment:

- Provide opportunities for meaningful access by LEP persons to Orange County's programs, services and activities based on the four-factors analysis;
- Identify resources to ensure that the County can balance meaningful access to programs and services while not incurring undue burdens on the County's financial resources; and
- Complete LEP LAP updates every three (3) years based on an assessment of the effectiveness of the Language Assistance Plan.

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Language Services Provided:

Current Services		
Area	Service	Description
Notification	<i>Print Publications</i>	Provide notification of the County's language assistance resources in all public meeting notices, ads and newsletters. Post ads in Spanish newspaper if vital.
	<i>Website</i>	Posted notifications with information regarding language assistance.
	<i>Direct Mail</i>	All vital communications will provide information regarding language assistance including, without limitation, point of contact information.
Outreach Materials	<i>General brochures</i>	Educational and informational (drug prevention, emergency safety, trainings, etc.)
	<i>Newsletters</i>	Notification of available information in Spanish and/or Haitian Creole, as appropriate, and contact information of the person to be contacted for language assistance.
	<i>Community Surveys</i>	Project-specific and conducted as needed.
Website	<i>Spanish</i>	Spanish language portal featuring important general information and contact information.
Phone Services	<i>Emergency Services</i>	Language Line services to provide interpretation services as needed when 911 is called.
	<i>Non-Emergency Services</i>	Orange County 311 Customer Service Center can patch in interpretation service (in-house staff) if the caller requires language translation assistance.
Meetings/Events	<i>Public Hearings</i>	Reasonable availability of translation services, at no cost, if requested.
	<i>Community Meetings</i>	Reasonable availability of translation services, at no cost, if requested.

New Services		
Area	Service	Description
Website Portal	Miscellaneous	Update the County's homepage to provide direct access to the County's Title VI Policy Plan and other Title VI information and resources.
Outreach Materials	<i>Educational Brochures</i>	Provide educational materials deemed as Vital Communication in Spanish and/or Haitian Creole, as appropriate.
	<i>Newsletters</i>	Provide notification of available language assistance in newsletters for County programs, services, and activities.
	<i>Community Surveys</i>	Provide surveys deemed as Vital Communication in Spanish and/or Haitian Creole, as appropriate.
	<i>Targeted Forms</i>	Provide forms and applications deemed as Vital Communication in Spanish and/or Haitian Creole, as appropriate. (May include: release, consent, waiver, administrative complaint, utility adjustment forms and applications for employment, housing assistance, etc.)

Notification Procedure

Upon adopting the Limited English Proficiency and Language Assistance Plan by county resolution, the County will publish the plan; additionally, the County will publish the availability of language assistance services, free of charge, prior to board and committee meetings, workshops, and public hearings. Notification will be provided on the County's website, within meeting notices, and on each agenda. The need for additional notification will be determined, in part, by the nature of the meeting or event and the degree to which such assistance is needed.

Standard notification regarding language assistance will read:

... Persons with limited English proficiency who require language translation or interpretation services at a public meeting or event, which services will be provided by the County at no cost, should contact the Orange County Title VI/Nondiscrimination Coordinator, Ricardo Daye, at 407-836-5825 or by email to Access@ocfl.net prior to the meeting or event.

Plan Evaluation and Auditing

The Orange County Limited English Proficiency Plan and Language Assistance Plan will be updated every three (3) years to ensure compliance with federal and state law by 1) updating the demographic statistics to accurately track Orange County's population and language needs, 2) confirming Orange County's commitment to providing meaningful opportunities for LEP persons to access County programs, services and activities, and 3) providing an assessment of the Plan's effectiveness in addressing nondiscrimination objectives. Evaluation of the Plan shall consider, at a minimum, the following performance measures:

- Number of requests for translation and/or interpretation assistance prior to or at public hearings, meetings, or other public event, including completed "I Speak" cards received;
- Number of unique hits to the Title VI/Nondiscrimination website portal; and
- Current LEP populations in the service area and nature and importance of activities to such LEP persons;
- Staff awareness of the LEP Plan and implementation;
- Viability and availability of assistance sources;
- Frequency of encounters with LEP language groups; and
- Whether provided assistance is meeting LEP needs.

All performance measures, including the above listed performance measures, shall be compiled and tracked annually by the Office of the Title VI/Nondiscrimination Coordinator and shall be used in conjunction with the best available demographics data from the American Community Survey to evaluate the Plan. The evaluation shall consider any significant changes in Orange County's

demographics that may warrant changes or updates to the Language Assistance Plan. This Plan shall become effective following adoption of the resolution by the Board of County Commissioners.