



Alachua County

Title VI Nondiscrimination Policy and Language Access Plan

August 28, 2024
Review Date

Policy Statement

Alachua County values diversity and welcomes input from all interested parties, regardless of cultural identity, background or income level. Moreover, Alachua County does not tolerate discrimination in any of its programs, services or activities. Alachua County will not exclude participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, religion, sex, marital status, age, disability, sexual orientation, gender identity or expression, income or family status.

Nondiscrimination Assurance

Alachua County is committed to nondiscrimination in its programs, services and activities, and equitable service to the community. The County's Nondiscrimination Assurance can be viewed at [Title VI Nondiscrimination Assurance](#) or by visiting the Alachua County Equal Opportunity Office.

Complaint Procedures

Alachua County has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Individuals who believe that they have been subjected to discrimination based on race, color, national origin, religion, sex, marital status, age, disability, sexual orientation, gender identity or expression, income or family status in the provision of programs, services, activities, or benefits by Alachua County, may file a complaint with the County's Title VI Coordinator within 180 days of the alleged discriminatory conduct. The Title VI Coordinator has easy access to the County Manager and is not required to obtain management or other approval to discuss discrimination issues with the County Manager. Contact:

Jacqueline Chung, Equal Opportunity Manager/Title VI Coordinator

Alachua County Equal Opportunity Office

12 SE 1st Street, 1st Floor, Gainesville, FL 32601

Email: jac@alachuacounty.us

Phone: (352) 374-5275

TDD/TTY users, call 711 (Florida Relay Service)

If possible, the complaint should be submitted in writing and contain the identity of the complainant; the basis for the allegations (i.e., race, color, national origin, religion, sex, marital status, age, disability, sexual orientation, gender identity or expression, income or family status); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, the complainant should contact the Title VI Coordinator for assistance. The Title VI Coordinator will respond to the complaint within thirty (30) calendar days and will take reasonable steps to resolve the matter.

If the complainant is unwilling to discuss the complaint with the County, the Title VI Coordinator will advise the complainant of the appropriate federal or state agency or authority to file the complaint.

Language Access Plan

It is the policy of Alachua County to provide timely meaningful access for individuals who are of Limited English Proficiency (“LEP”) in all Alachua County services, programs, and activities. All language assistance services are free to all LEP individuals who request language assistance services in the delivery of County programs, services, and provisions. Staff will regularly review and evaluate this policy with meaningful engagement on language services and procedures with relevant internal and external stakeholders.

Purpose and Authority

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for Alachua County employees to follow when providing services to, or interacting with, individuals who have limited English proficiency. Following this policy is essential to the success of our mission to provide meaningful access to the LEP community to all Alachua County services, programs, and activities.

Staff Compliance

Alachua County staff will provide free language assistance services to LEP individuals who they encounter or when an LEP person requests language assistance services. Each Department Director is responsible to ensure LEP persons have access to the services their department provides, and to ensuring department staff receives training on providing language access services to the LEP community. Within guidelines provided during staff training, the department may opt to use either a professional vendor or in-house interpreter who has demonstrated their competence to interpret or translate through evaluation by the Immigrant and Language Services Coordinator or certification by a qualified entity.

Language Assistance Measures

Ensuring the quality and accuracy of language assistance services provided by each Department is critical to providing LEP individuals with meaningful access to department programs and activities.

Identification of LEP Communities

- Alachua County will provide language services based on the primary languages other than English- spoken by students enrolled in Alachua County Public Schools, the languages requested to our combined communications center, as well as languages spoken through existing partner organizations.
- Departments should also identify and track the primary language of LEP individuals that seek and receive programs and services. By regularly collecting and updating this data, departments will be able to accurately identify and efficiently address the changing needs of their LEP communities.

Quality of Language Access Services

The Immigrant and Language Services Coordinator’s role is to ensure that the County will take reasonable steps to ensure that all staff who serve as translators, interpreters or who communicate “in-language” with LEP persons are competent to do so using an accredited language evaluation agency to determine what language level the employee is on. Considerations of competency may include:

- (1) Demonstrated proficiency in and ability to communicate information accurately in both English and the other language;
- (2) Identifying and employing the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation), translating, or communicating fluently in the target language;
- (3) Knowledge in both languages of any specialized terms or concepts particular to the component’s program or activity and of any particularized vocabulary used by the LEP person;
- (4) Understanding and following confidentiality, impartiality, and ethical rules to the same extent as Department staff;
- (5) Understanding and adhering to their role as interpreters, translators, or bilingual staff. Department liaisons will also take reasonable steps to ensure that when translating text, all staff or contracted personnel who serve as translators are briefed by department staff on the context and intended audience.

Absent exigent circumstances

- Departments should avoid using family members (including children), neighbors, friends, acquaintances, and bystanders to provide language assistance services.
- Departments will also avoid using individual opposing parties, adverse witnesses, or victims to a dispute as interpreters. Using family, friends, bystanders, or parties to a dispute to interpret could result in a breach of confidentiality, a conflict of interest, or inadequate interpretation.

Types of Language Assistance Services: the primary types of language assistance services are oral and written.

· Interpretation Services: Oral language assistance service may come in the form of "in-language" communication (a qualified bilingual staff member communicating directly in an LEP person's language) or interpreting. An interpreter renders a message spoken in one language into one or more other languages. Interpretation can take place in-person, through a telephonic interpreter, or via internet or video interpreting. Departments will ensure that the Immigrant and Language Services Coordinator has designated interpreters as "qualified" prior to engaging them for services.

· Translation of Vital and Necessary Documents: Departments should proactively translate vital written documents into the frequently encountered languages of LEP groups served or likely to be affected by the benefit, program, or service in Alachua County.

1. When department staff have reason to believe that an individual is LEP, the department must respond to that LEP individual in a language they understand. For example, a letter sent to a specific LEP person should be translated into the appropriate language for that individual to ensure effective communication.

2. Departments should prioritize translation of vital documents. Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. The determination of what documents are considered "vital" is left to the discretion of individual department, which are in the best position to evaluate their circumstances and services within their language access planning materials.

Vital documents – refers to documents meant for the public or a broad audience, and documents that are specific communications regarding a case or matter between an individual and the Department.

- Each department should exercise its discretion for identifying and prioritizing vital documents or texts to translate.
- Departments should ensure all translations are completed by translators who are designated as "qualified" by the Immigrant and Language Services Coordinator.

• Documents that may be considered "vital" may include, but are not limited to:

(a) Administrative complaints, releases, or waiver forms;

(b) Claim or application forms;

(c) Public outreach or educational materials (including web-based material);

(d) Letters or notices pertaining to policies changes or updates;

(e) Written notices of rights, denial, loss, or decreases in benefits or services, or hearings;

(f) Forms or written material related to individual rights;

(g) Notices of community meetings or other community outreach;

(h) Notices regarding the availability of language assistance services provided by the County at no cost to LEP individuals;

(i) Invoices and other payment documents

Translation of Emergency Notices, Social Media, and Press Releases

· **Emergency Notices:** In the event of emergencies, it is our commitment to ensure that vital information reaches all members of our community, regardless of their language proficiency. Emergency notices will be translated promptly into languages spoken by significant portions of our community to facilitate effective communication and ensure everyone's safety and well-being.

· **Social Media Communication:** Our organization recognizes the importance of using social media platforms to disseminate timely information to the public. To ensure inclusivity, key announcements, updates, and important messages will be translated into the five primary languages other than English. This includes, but is not limited to platforms such as Facebook, Twitter, Instagram, and others used for community engagement.

· **Press Releases:** Press releases serve as a crucial means of communicating with the media and wider community. We are committed to providing translations of press releases into languages relevant to the demographics of our audience. This ensures that our messages are accessible and understood by all members of our community, fostering transparency and inclusivity in our communication efforts.

· **Translation Process:** Translations of emergency notices, social media posts, and press releases will be conducted by qualified translators proficient in both the source and target languages. Accuracy, clarity, and cultural sensitivity will be prioritized to effectively convey the intended message to diverse language groups.

· **Accessibility:** Translated versions of emergency notices, social media content, and press releases will be made readily accessible through appropriate channels such as our website, social media platforms, and other communication channels utilized by our organization.

· **Feedback Mechanism:** We welcome feedback from community members regarding the effectiveness of our translation efforts. Any suggestions or concerns regarding language access will be taken into consideration as we strive to improve our communication practices and better serve the needs of our diverse community.

Notice of Language Assistance Services: Departments must inform LEP individuals of their eligibility for benefits, programs, and services in a language that they understand.

· Departments should assess all points of contact, by telephone, in-person, by mail, and any electronic communication their staff has with the public and LEP individuals when determining the best method of providing notice of language assistance services, and how to access those services.

Staff Training

Language Access Training will be mandatory for Department directors, supervisors, interpreters, translators, or frontline staff who encounter LEP individuals and carried out by the Immigrant and Language Services Coordinator, with assistance from Organizational Development and Training.

§ Staff will receive training on identifying LEP residents and the procedures for accessing language assistance services provided by the County.

§ New employees will receive training at new employee orientation on available language access resources.

§ Yearly training will be available to existing staff to ensure effective implementation of the policies and procedures.

The County will provide training for all staff before this new plan is implemented, to include a review of the Language Access Policy and Procedures, training on utilizing translation services for written materials and utilizing currently used language and sign language interpreter services. Subsequent staff training will be the responsibility of the manager or supervisor; new staff will be trained during onboarding.

Training for language access services will include training on LEP services, cultural responsiveness, and customer service to help staff deliver effective and efficient language access services to our LEP clients.

Language Access Working Group

The Language Access Working Groups (LAWG) will be two teams of interagency language advocates throughout Alachua County who will work to monitor the County's progress on implementing the goals and expectations set forth in the Language Access Plan. Both the LAWG Core and General Teams will work collaboratively to establish consistency in implementing the plan across the County's components in public information, programs, and benefits. The Core Team should be made up of no more than seven (7) Alachua County employees and the Immigrant and Language Services Coordinator. Core team members will be selected by the Immigrant and Language Services Coordinator; the General team should include relevant stakeholders, such as community leaders and local organizations, in addition to Alachua County staff.

Staff and community members selected to form part of the LAWG should be bilingual or multilingual community members, as well as representatives from various departments and leadership offices.

County representatives who are participants in the LAWG will:

- a) assess departmental operations for LEP needs and gaps in service;
- b) train County employees on the language access plan, along with policies and protocols to implement the plan, and
- c) convene regularly (bimonthly) and establish smaller focus groups or subcommittees to discuss topics including human rights, access to services, and health services access. Smaller focus groups help to share knowledge on language access issues affecting components with correctional responsibilities and components that provide federal financial assistance.

Performance Measurement

The Immigrant and Language Services Coordinator will conduct an audit of language assistance services on an annual basis. The audit will involve:

1. Reviewing and revising the Language Access Policy and procedures by meeting with relevant departments twice a year to gather feedback on current resources and communication processes, both written and verbal.
2. Making intermittent calls to confirm compliance with established protocols for connecting with over-the-phone interpreters, thus maintaining procedural integrity within the internal system.
3. Holding evaluation discussions with community partners who assist limited English proficient (LEP) speakers.

Key Definitions

- a. Bilingual staff – A staff person employed by Alachua County who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language as authorized by their department.
- b. Consecutive Translation – the practice of delayed, oral translation involving a speaker saying a sentence or two, then a pause is usually needed while the interpreter translates what was said into another language.
- c. Interpretation – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- d. Language Assistance Services – Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Department.
- e. Limited English Proficient (LEP) Individuals – Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

- f. Meaningful Access – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual.
- g. Necessary document – Paper or electronic written material that contains information that is important for accessing a component’s program or activities but is not required by law.
- h. Primary Language – An individual’s primary language is the language in which an individual most effectively communicates.
- i. Program or Activity – The term “program or activity” and the term “program” mean all of the operations of the Department.
- j. Qualified Translator or Interpreter – An in-house or contracted translator or interpreter who has demonstrated their competence to interpret or translate through testing by the Immigrant and Language Services Coordinator, Certification by a qualified entity, or is authorized to do so by contract with the Department and if a County employee approved by their department.
- k. Sight Translation – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.
- l. Simultaneous Translation – The practice of translating a message from a source language to a target language in real-time.
- m. Translation – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- n. Vital Document – Paper or electronic written material that contains information that is critical for accessing a component’s program or activities or is required by law.

Public Involvement

A citizen Equity Advisory Board was established by the Board of County Commissioners to assist staff with reviewing County policies, programs and procedures for race and gender bias, make recommendations on eliminating such bias, and ensure that input from communities most impacted or disadvantaged by such bias is included in the development of policy recommendations and the design and delivery of County programs and services.

Persons wishing to request special presentations by County staff; volunteer in any of its activities; offer suggestions for improvement; or to simply learn more about County programs and services should visit: www.alachuacounty.us or contact:

Gina Peebles, Assistant County Manager
12 SE 1st Street, 2nd Fl, Gainesville, FL 32601
Email: gpeebles@alachuacounty.us
Phone: (352) 538-8265
TDD/TTY users, call 711 (Florida Relay Service)

Data Collection

Federal regulations require federal-aid recipients to collect racial, ethnic and other similar demographic data on beneficiaries of or those affected by its programs, services and activities. Alachua County accomplishes this through the use of census data, American Community Survey reports, Bureau of Business and Economic Research at the University of Florida, and other resources. From time to time, the County may find it necessary to request voluntary identification of certain racial, ethnic or other data from those who participate in County programs, services or activities. This information assists the County with improving service equity and ensuring effective outreach. The County will not release or otherwise use this data in any manner inconsistent with state or federal regulations.

Title VI Grievance Procedure

Alachua County Title VI grievance procedures comply with Title VI of the Civil Rights Act of 1964, and other related federal and state statutes and regulations. The procedures are posted on the Equal Opportunity Office webpage and can also be viewed here [Title VI Grievance Procedure](#).

Accessibility of County Programs, Services and Facilities

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 individuals with disabilities and ensure that their needs are equitably represented in programs, services and activities.

Alachua County will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. The County will make every effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include representation by the disabled community and disability service groups. Because providing reasonable accommodation may require outside assistance, organization or resources, the County asks that requests be made at least 2 business days prior to the need for accommodation.

The following public notice is on County websites, press releases, and notices of public meetings or events:

If you have a disability and need an accommodation in order to participate in a County program, service or public meeting, please contact the Equal Opportunity Office at 352-374-5275 at least 2 business days prior to the event. TDD/TTY users please call 711 (Florida Relay Service).

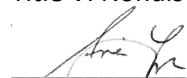
Questions, concerns, comments or requests for accommodation should be made to the County's ADA Coordinator:

Jacqueline Chung, Equal Opportunity Manager/ADA Coordinator
Alachua County Equal Opportunity Office
12 SE 1st Street, 1st Floor
Gainesville, FL 32601
Email: jac@alachuacounty.us
Phone: (352) 374-5275
TDD/TTY users call 711 (Florida Relay Service)

ADA Grievance Procedure

The [ADA Grievance Procedure](#) is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of programs, services, activities, or benefits by Alachua County. The Alachua County Equal Employment Opportunity Policy governs employment-related complaints of disability discrimination. The procedures are also available on the Equal Opportunity Office webpage.

Title VI Nondiscrimination Policy-Language Access Plan Approved:



County Manager or designee

8/30/24

Date