



CITY OF ORANGE

TITLE VI PLAN

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This document is available in other languages upon request

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CITY OF ORANGE
TITLE VI PLAN

August 11, 2020

TITLE VI AND RELATED STATUTES
NONDISCRIMINATION STATEMENT

The City of Orange, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall, on the grounds of race, color, national origin, sex, disability or age be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program, service or activity provided by the City of Orange.



RICK OTTO
City Manager

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NOTICE TO PUBLIC

CITY OF ORANGE **RIGHTS UNDER TITLE VI**

Title VI of the Civil Rights Act of 1964 provides that “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.” To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing general rules, regulations, or requirements.

Since 1972, the Federal Transit Administration (FTA) has required recipients of Federal assistance to certify compliance with the requirements of Title VI as part of the funding eligibility process.

The City of Orange gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Acts of 1964 and related regulations. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

For additional information on the City of Orange’s nondiscrimination obligations, please contact the City’s Equal Opportunity Office by mail, telephone or email using the information below:

City of Orange
Public Works Department
300 E. Chapman Avenue
Orange, California 92866
Office: (714) 744-5525
Email: pwinfo@cityoforange.org

If you believe you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under a City of Orange program, you may file an official Title VI complaint with the Equal Opportunity Office. You must make your complaint in writing. A complaint must be filed within 180 days after the date of the alleged discrimination. The Title VI Complaint Procedures and Complaint Form can be obtained by calling the number above:

- Title VI Complaint Procedures
- Title VI Complaint Form

If information is needed in another language, please contact Public Works Department at (714) 744-5525

**(This Notice is posted on the City's Website, on all City break room bulletin boards, and at the City of Orange W/O/R/K Center)*

CITY OF ORANGE
TITLE VI COMPLAINT PROCEDURES

A. INTRODUCTION

Title VI of the Civil Rights Act of 1964 provides that “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.” To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing general rules, regulations, or requirements.

The Title VI Complaint Procedures are intended to provide aggrieved persons an avenue to raise complaints of discrimination regarding the programs, activities and services provided by the City of Orange, as required by statute.

B. PURPOSE

The purpose of the complaint procedures is to describe the process used by the City of Orange for processing complaints of discrimination under Title VI of the Civil Rights Act of 1964 and related statutes. Title 49 Code of Federal Regulation (CFR) section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligation under this part.”

C. ROLES AND RESPONSIBILITIES

1. Sub-recipients. Title 49 Code of Federal Regulation (CFR) section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligation under this part.”
2. The Director of Human Resources and Employee Relations (the “Director”) has overall responsibility for the discrimination complaint process and procedures.
3. The Director is responsible for conducting an impartial and objective investigation, collect factual information and prepare a fact-finding report based upon the information obtained from any investigation.
4. In cases where the complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint. All complaints, however, must be signed by the complainant.

D. TITLE VI COMPLAINT PROCEDURES

Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by the City of Orange, may file a Title VI complaint with the Equal Opportunity Office. The following steps describe the procedures to file a complaint and how the City of Orange will respond.

1. **Applicability.** The complaint procedures shall only apply to the beneficiaries of City of Orange programs, activities, and services, including but not limited to members of the public, contractors, subcontractors, consultants and other users, recipients, or sub-recipients of any City program, activity or service.
2. **Eligibility.** Any person who believes that he/she has been excluded from participation in, denied benefits or services of any program, activity or service administered by the City of Orange or its sub-recipients, consultants, and contractors on the basis of race, color, national origin, sex, age, or disability may bring forth a complaint of discrimination under Title VI and related statutes.
3. The complaint must be submitted to the Equal Opportunity Office no later than 180 days after the date of the alleged discrimination.
4. A Title VI Complaint Form can be obtained by calling (714) 744-5525 or by downloading the form from our website at www.cityoforange.org. Please provide the following information on the complaint form or you may submit a signed written statement that contains all of the following written information.
 - Your name, address and how to contact you (phone number, email address, etc.).
 - The basis of the alleged discrimination complaint (race, color, or national origin).
 - The date of the alleged act of discrimination.
 - How, why, when and where you believe you were excluded from participation in, were denied the benefits of, or were subjected to discrimination.
 - Include the location, names and contact information of any witnesses.
 - Indicate whether you have filed the complaint with the Federal Transit Administration.
 - You must sign your letter of complaint.

If you as the Complainant are unable to write a complaint, the Equal Opportunity Office will assist you with the complaint. The City of Orange is committed to providing open access to its services to persons with limited ability to speak or understand English; if requested by the complainant, the Equal Opportunity Office will provide language translation services.

5. The complaint shall be sent to the following address:

City of Orange
Public Works Department
300 E. Chapman Avenue
Orange, California 92866
Office: (714) 744-5525
Email: pwinfo@cityoforange.org

6. Types of Complaints. All Title VI and related statute complaints are considered formal as there is no informal process. Complaints **must** be in writing and **signed** by the complainant. Complaints must include the complainant's name, address and phone number and be detailed enough to specify all issues and circumstances, including but not limited to, potential witnesses of the alleged discrimination.
7. Once the complaint is received, the Equal Opportunity Office will review it to determine if our office has jurisdiction. The Complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.
8. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Equal Opportunity Office will review every complaint, and when necessary, begin the investigation process.
9. Upon completion of the investigation, the Equal Opportunity Office will complete a final report. The investigation process and final report should take no longer than ninety (90) days after receipt of the complaint. If a Title VI violation is found to exist, a Determination letter will be issued which summarizes the allegations and the interviews regarding the alleged incident, and explains the remedial steps as appropriate and necessary to be taken immediately. If no Title VI violation is found, Complainant will receive a closure letter which summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
10. If the Complainant wishes to appeal the decision, she or he has 30 days after the date of the letter to do so. Complainant may contact the Federal Transit Administration, Regional 9, Regional Civil Rights Officer, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839, (415) 744-3133, Fax - (415) 744-2726.
11. A person may also file a Title IV complaint, no later than 180 days after the date of the alleged discrimination, directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, DC 20590, (202) 366-4043.



CITY OF ORANGE

TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of **race, color or national origin** in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground 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.”

Title VI guarantees fair treatment for all people and provides for the City of Orange, to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the programs, services, and information the City of Orange provides.

SECTION I

Name _____

Mailing Address _____

Telephone Numbers (Home) _____ (Mobile) _____

Electronic Mail (Email) Address _____

Are there any accessible format needs?

() Large Print

() CD/Audio Tape

() TDD

() Other _____

SECTION II

Are you filing this complaint on your own behalf? ____ Yes* ____ No

*If you answered “yes” to this question, go to Section III.

If not, please supply the name and relationship of the person for who you are complaining:

Please explain why you have filed for a third party: _____

CITY OF ORANGE _____

TITLE VI COMPLAINT FORM

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ____Yes ____No

SECTION III

List type of discrimination you experienced: (please check all that apply):

Race () Color () National Origin () Other _____

Please indicate your race/color, if it is a basis of your complaint _____

Please describe your national origin, if it is a basis of your complaint _____

Location where alleged discrimination occurred _____

Time and date of alleged discrimination _____

Name/Position title of the person who allegedly subjected you to Title VI discrimination:

Please explain as clearly as possible what happened, why you believe it happened and how you were discriminated against. You should include specific details and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint. (Use a separate sheet if necessary)

Please list below any persons, witnesses, if known, whom we may contact for additional information to support or clarify your complaint (Name, Address and Telephone Number):

SECTION IV

Have you previously filed a Title VI complaint with this agency? ____Yes ____No

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ____Yes ____No

Federal Agency: _____ Date: _____

Federal Court: _____ Date: _____

State Agency: _____ Date: _____

State Court: _____ Date: _____

Local Agency: _____ Date: _____

SECTION V

What remedy are you seeking for the alleged discrimination?

How did you learn that you could file this complaint?

SECTION VI

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

YOUR SIGNATURE AND TODAY'S DATE ARE REQUIRED BELOW:

Signature _____

Date _____

Please submit this completed form in person, or mail the form to: City of Orange, Public Works Department, Title VI - Equal Opportunity Office, 300 E. Chapman Avenue, Orange, California 92866.

Please make a copy for your records.



CITY OF ORANGE TITLE VI

LIST OF TRANSIT-RELATED INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

The City of Orange currently does not have any investigations, complaints or lawsuits with regards to Civil Rights Violations.

ADVISORY BOARDS

The City of Orange currently does not have any advisory boards or committees with decision making responsibilities assigned to the parking structure project.



CITY OF ORANGE

TITLE VI - PUBLIC PARTICIPATION PLAN

PURPOSE

The City of Orange's Public Participation Plan is organized to work in concert with the Title VI Plan and the Limited English Proficiency Plan. The purpose of the Public Participation Plan is to establish procedures that allow for, encourage, and monitor the participation of all citizens living and working in the City, and users of public transportation. Special attention will be paid to soliciting input from low-income and minority communities that are traditionally underrepresented. A survey tool may be developed to seek information about personal transportation and the most effective channels of communication for the City to engage the citizenry. A survey tool may be used to solicit input for the Public Participation Plan.

GOALS AND OBJECTIVES

The City's public involvement plan has a single comprehensive goal to allow the public opportunities throughout the planning process to provide input in the decision making process. In order to meet this goal, the City has established the following objectives:

1. Identify the most appropriate methods for reaching the public.
2. Determine what non-English languages and other cultural barriers exist to public participation within the Orange area.
3. Hold meetings in locations that are accessible and reasonably welcoming to all area residents, including but not limited to low-income and minority members of the public.
4. Keep the public informed through effective channels of communication and allow input from those not likely to attend meetings.
5. Work to actively involve the public in programs, policy-making and projects.
6. Ensure that the City's public involvement plan is dynamic and responsive.
7. Use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps, and the internet.

IDENTIFICATION OF STAKEHOLDERS

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

General Citizens: There are 136,416 residents in the Orange area (U.S. Census, 2010). A general breakdown of the total population include: 46.8 percent of the population reported as White; 38.1 percent are persons of Hispanic origin; 11.1 percent reported as Asian and Pacific Islander; 1.4 percent are Black persons; 2.6 percent is all Other Races.

Low-income: Low-income households (below poverty level) account for 8.2% of all households in Orange and should be given every reasonable opportunity to provide input on transportation plans and programs.

Public Agencies: Public agencies can provide valuable input to the planning process, in addition to assisting in gaining attention from traditionally under-represented populations.

Private Organizations and Businesses: Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employees. For that reason, the representation of private business interests will be welcomed in the planning process.

OUTREACH TECHNIQUES

Engaging minority and Limited English Proficiency populations can be challenging. Below is a list of outreach techniques that the City may use to actively solicit public input in the planning process of a project.

Newsletters:

Quarterly newsletters may be available in both print and e-formats. Newsletters provide the public and local government partners with progress updates on projects and programs. These newsletters may offer a frequent channel of communication with the public and allow the public to stay informed.

Website:

A well organized and engaging website is the cornerstone of the City's communication strategy. The website offers a user-friendly structure and linguistic style understandable to lay people interested in projects and the planning process. In addition, the website follows the guidelines of Section 508 of the Rehabilitation Act, so that it can accommodate disabled users.

The City may utilize common social media forums (Facebook) to disseminate project information.

Public Notices:

The City may include notations in public notices in appropriate non-English languages that will provide a contact where the individual can be informed of the process/project, and will have an opportunity to give input.

Public Meetings & Focus Groups:

The City may host public meetings and focus groups on discussing topics/projects of interest with the public. When hosting public meetings, the City will provide adequate notice to the public and follow all federally prescribed guidelines regarding public comment periods. The City will make a good faith effort to notify the public, such as posting in work places. At meetings, the City will utilize visualization aides, such as power-points and maps, to assist the public in understanding the situation.

PERFORMANCE METHODS

Periodically, the City may undertake an internal review of its public participation plan's effectiveness of engaging the public, by examining criteria, such as:

- Records public meetings,
- Records of responses to citizen email, and
- Input from the general public.

PUBLIC PARTICIPATION PLAN (PPP)

The availability of this plan for review will be advertised in a manner reasonably expected to reach the general public, as well as minority populations, low-income persons, and traditionally under-served populations. This advertisement could occur through contacts mentioned earlier in this document, notification of contacts are available in English and/or Spanish languages.

For project and PPP information, please contact:

City of Orange
Public Works Department
300 E. Chapman Avenue
Orange, California 92866
Office: (714) 744-5525
Email: pwinfo@cityoforange.org



CITY OF ORANGE

Limited English Proficiency (LEP) Plan

TITLE VI

I. PURPOSE

To establish guidelines for the City of Orange to provide timely and reasonable language assistance to Limited English Proficiency (LEP) persons who come in contact with the City. This plan is established pursuant to and in accordance with Title IV of the Civil Rights Act of 1964 and its implementing regulations and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency".

Title VI of the Civil Rights Act of 1964 requires that "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.

Executive Order 13166 was adopted to improve access to federally conducted and federally assisted programs and activities for persons who as a result of national origin, are limited in their English proficiency. This plan reiterates the City of Orange's position that it will provide the language assistance necessary for meaningful participation in its programs and services to persons who, as a result of national origin, are limited in English proficiency.

II. REFERENCES

- Federal Register, Volume 68, Number 103, Civil Rights Center; Enforcement of Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: Notice (May 29, 2003)
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000)
- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 26-02, Publication of Revised Guidance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (May 29, 2003)

III. BACKGROUND

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In order to avoid discrimination against LEP persons on the grounds of national origin, we must take reasonable steps to ensure that such persons have meaningful access to the programs, services, and information.

Language barriers prohibit LEP persons from obtaining services and information relating to a variety of services and programs because they may not be able to read instructions or correspondence written in English and may not understand verbal information. Many times, they are not aware of regulatory requirements and legal implications of the services they seek. When LEP persons receive legal documents, they often do not understand the contents of the correspondence and its implication to their daily lives. LEP persons may not be able to take advantage of services, which could affect their job and social opportunities. When individuals do not understand or read English, they can be hampered in seeking employment opportunities.

IV. GOALS

City staff must be informed about their diverse clientele from a linguistic, cultural and social perspective. These individuals will be culturally competent so they can encourage vulnerable LEP minority populations to access and receive appropriate services with more knowledge and confidence. The key to providing meaningful access to LEP persons is to ensure that LEP persons can communicate effectively and act appropriately based on that communication. Minimum reasonable measures would be to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in programs or activities.

Spanish is the most requested languages for interpreters in the City of Orange. City staff will make designated publications available in languages other than English and provide interpretation/translation services to persons who are not proficient in English.

The City will take reasonable steps to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in recipient programs or activities, where appropriate

V. Four Factor Analysis

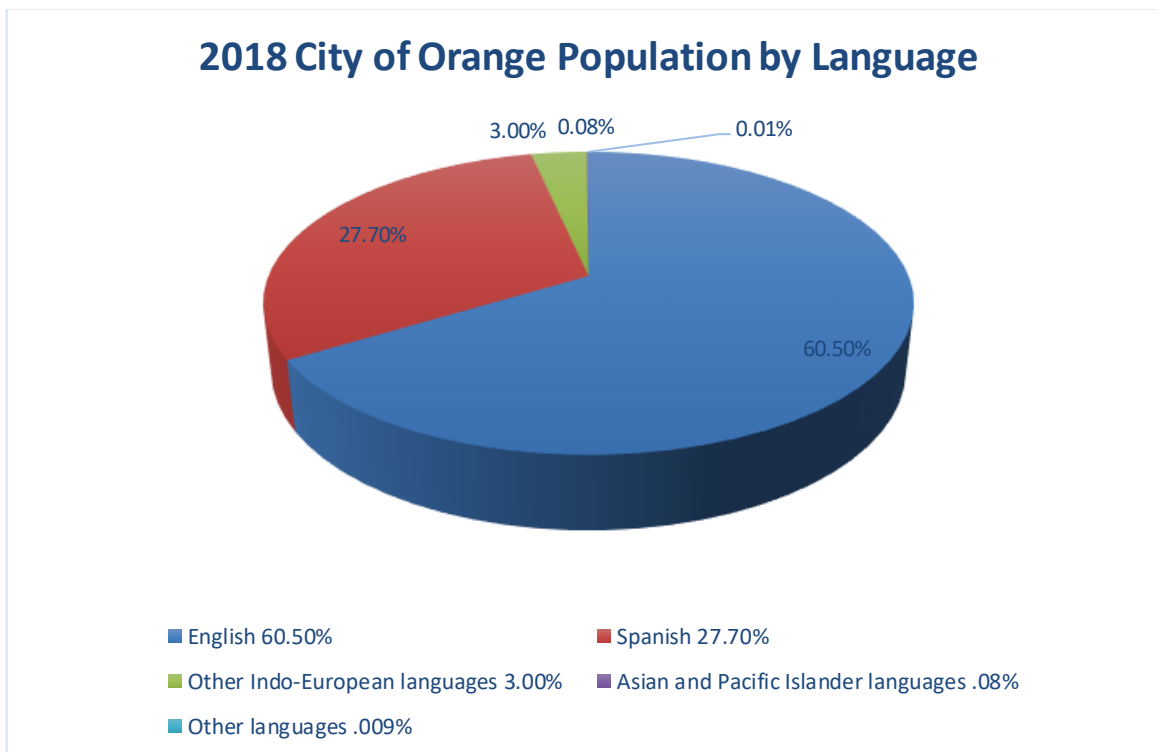
1. Include the number of LEP persons in the service area who may be served by the City.

City staff reviewed the 2018 American Community Survey (ACS) Five-Year Estimate to determine the approximate number of LEP persons age five-years and older in the City of Orange. The ACS indicated that approximately 39.5% of Orange residents speak a language other than English at home.

Orange City,
 California

LANGUAGE SPOKEN AT HOME IN CITY OF ORANGE	Estimate	Margin of Error	Percent	Percent Margin of Error
Population 5 years and over	131,502	+/-683		
English only	79,546	+/-2,014	60.50%	+/-1.5
Language other than English	51,956	+/-1,984	39.50%	+/-1.5
Spanish	36,429	+/-1,628	27.70%	+/-1.2
Other Indo-European languages	3,907	+/-609	3.00%	+/-0.5
Asian and Pacific Islander languages	10,473	+/-1,012	8.00%	+/-0.8
Other languages	1,147	+/-458	0.90%	+/-0.3

DateSource:<https://data.census.gov/cedsci/table?id=ACSDP5Y2018.DP02&y=2018&g=1600000US0653980>



2. The frequency with which LEP persons come in contact with City programs, activities or service

We have a wide variety of people from various backgrounds who participate in our programs and services representing diverse age groups, ethnicities, abilities, and languages spoken. While we do not collect average statistics across all City programs, we are prepared to serve people who speak multiple languages via a multi-pronged approach consisting of interpreters, translated written material, and a website and social media that are available in multiple languages.

3. The nature and importance of programs, activities or services provided by the City to the LEP Population

The City recognizes that per the U.S. Census Bureau, 2018 American Community Survey Five-Year Estimate 39.5% of the City population spoke a language other than English at home. The City offers a wide variety of customer service assistance through the various City Departments. The provision of resources, direct services, and programs through our public facilities, including but not limited to, our Community Centers, Libraries, and Senior Center, play a significant role in allowing access to social and recreational enrichment opportunities, which improve the quality of life in the City of Orange.

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

Outreach expenses as they relate to LEP populations are shared among several departments (Public Works, Human Resources, Community Services, Library, Police, Fire, and Community Development). The City updated its website with the capability to translate information into many different languages. Most of the City's public counters have bilingual Spanish speakers, the most common language requested in the City of Orange. Also, available in each department is contracted service for other foreign languages at no charge. Costs for marketing materials and translation of documents for outreach are minimal and have not been quantified.

5. Summary

Based on the four-factor analysis, the City of Orange has identified the language needs and services required to provide meaningful access to information for the LEP residents of the City of Orange. This LEP Plan will be every 3 years and incorporate LEP information that further identify additional language needs for the top languages identified.

VI. PLANNING – DEVELOPING A LANGUAGE ASSISTANCE PROGRAM (LAP)

A. Identification of LEP Persons

City staff may use the following methods to identify LEP persons:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or from referrals to determine whether language assistance might be needed for future events or literature.
- Provide language identification forms that invite LEP persons to identify their language needs to our staff members. Records will be maintained for a 3-year period.

B. Language Assistance Measures

Staff can accomplish several language assistance measures to assist LEP persons, including the following:

- Translate an inventory of existing materials in a variety of languages based on demographics, including Spanish.
- Regularly review and update these materials.
- Assure LEP persons have access to staff that is trained and competent in the skill of interpreting/translation.
- Contract with an outside interpreter service for trained and competent interpreters, as needed.
- Arrange for the services of voluntary community interpreters who are trained and competent in the skill of interpreting.
- Arrange for the use of a telephone language interpreter service.
- Establish linkage between minority community-based organizations for assistance in cultural understanding and interpretation services.
- Post and maintain signs in waiting rooms, reception areas and other initial points of entry in languages other than English. In order to be effective, these signs should inform applicants and beneficiaries of their right to free language assistance services and invite them to identify themselves as persons needing such services.
- Translate application forms and instructional, informational, and other written materials into appropriate non-English languages by competent translators.
- For LEP persons where written documents do not exist in their language, assistance should be provided from an interpreter/translator to explain the contents of documents.

- Efforts for assistance to low-frequency, unusual or unexpected languages may include, but are not limited to, using a telephone language line, and locating and temporarily employing a qualified interpreter who can communicate in the appropriate language.
- Notices and information that are generally available to the public will be made available to identified LEP populations.
- Establish uniform procedures for timely and effective telephone communication between staff and LEP persons. This information will include instructions for English-only-speaking employees to obtain assistance from interpreters or bilingual staff when receiving calls from or initiating calls to LEP persons.
- Statements about the services available and the right to free language assistance services, in appropriate non-English languages, will be included in brochures, booklets, outreach, and recruitment information and other materials that are routinely disseminated to the public.
- Ensure that translated materials provide referrals to telephone numbers or websites that are linguistically accessible.

C. Training

Training for front-line staff members, who are often the first points of contact with LEP Individuals, is provided by City Personnel. Staff training may include:

- Identifying and tracking language preference information of LEP persons;
- Delivering services effectively to LEP persons;
- Assuring staff sensitivity to the literacy level of LEP persons;
- Describing LEP services offered to the public;
- Procuring interpreter services;
- Identifying and documenting the language needs of LEP persons;
- Processing a Title VI/LEP complaint;
- Familiarity with Disability Awareness, Ethics, Civil Rights and Conflict Management issues.

This LEP plan will be distributed to all staff assigned at public counters.

D. Providing Notice to LEP Persons

Notice of language assistance services will be accomplished as follows:

- Signs to be posted in the entry areas regarding the availability of services and that they are free of charge.
- Website, documents and brochures will be offered or printed in alternative languages and will include that, language services are available and are free of charge.
- Staff will inform LEP persons that language assistance is available and is free of charge.

VII. MONITORING AND UPDATING THE LEP

A Human Resources representative will periodically review the effectiveness of the LEP Plan. The evaluation will include the identification of any problem areas and development of required corrective action strategies. Elements of the evaluation may include:

- Identification of the number of LEP persons requesting interpreters/translators;
- Review of up-to-date community and demographic information;
- Determination of whether interpretation/translation services have been effective;
- An assessment of current language needs to determine if additional services or translated materials should be provided;
- An assessment of whether staff members adequately understand LEP guidelines and procedures and how to carry them out;
- Gathering feedback from LEP communities in the service areas of the City, such as schools, faith-communities, and other resources.

VIII. DEFINITIONS

Limited-English-Proficient Persons: Individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit provided by Orange Workforce Investment Board.

Linguistically Isolated: This term is defined in the Census as the percentage of the persons in households in which no one over the age of 14 speaks English well, and is used as a direct measure of those persons with a severe language barrier, as distinct from those of foreign origin who speak English well.

Low Frequency and Unusual or Unexpected Languages: An individual with limited English skills who does not speak a language spoken by a “significant number or proportion of the population”.

Qualified Interpreter: Qualified interpreter means an interpreter who can interpret effectively, accurately, and impartially, either for individuals with disabilities or for individuals with limited English skills. The interpreter should be able to interpret both receptively and expressively, using any necessary specialized vocabulary.

Non-English Language Relay Service: A telecommunications relay service that allows persons with hearing or speech disabilities who use languages other than English to communicate with voice telephone users in a shared language other than English, through a communications assistant who is fluent in that language.

The City's LEP Plan and Title VI Complaint Procedure are available on the City of Orange's website at www.cityoforange.org. Any person or agency may request a copy of the LEP Plan via telephone, fax, mail, or in person and shall be provided a copy of the Plan at no cost.

Questions or comments about the LEP Plan may be submitted to the Equal Opportunity Office, City of Orange, Public Works Department, 300 E. Chapman Avenue, Orange, California 92866. (714) 744-5525 or pwinfo@cityoforange.org.