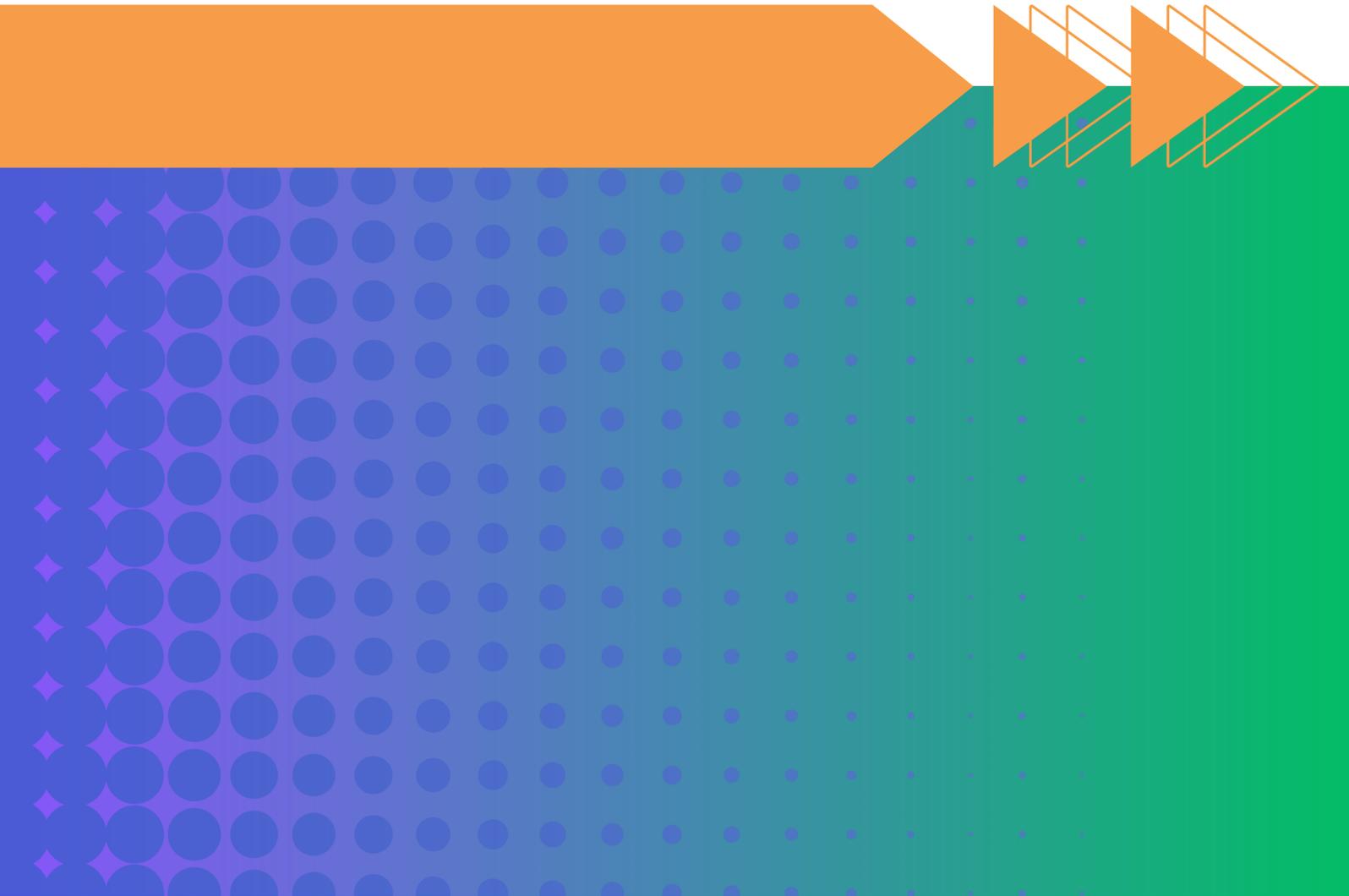




LANGUAGE ACCESS PLAN ADDENDUM



Orange County, FL Language Access Plan Addendum

The Orange County Housing and Community Development (HCD) Division has created this Language Access Plan Addendum as a recipient of U.S. Department of Housing and Urban Development's (HUD) funds, including the Community Development Block Grant (CDBG) program and Community Development Block Grant Disaster Recovery (CDBG-DR) program. Under Title VI of the Civil Rights Act of 1964, Executive Order (EO) 13166, and 72 FR 2732, recipients of these funds are required to take reasonable efforts to provide persons who are Limited English Proficient (LEP) with access to all services, activities, and programs.

Four-Factor Analysis

An updated four-factor analysis is utilized as a part of HUD's 72 FR 2732 language access requirements for LEP persons, which is meant to be flexible and context-dependent. The analysis is designed to balance the need to ensure LEP persons with meaningful access to critical services against the limited resources and finances of recipients. It takes into account the following four factors:

1. The number or proportion of LEP persons in the service population;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available and costs to the recipient.

Factor 1: Number and Proportion of LEP Persons in the Service Population

According to 2021 American Community Survey One-Year Data, approximately 14.1% of Orange County's total population is considered LEP (184,716 total persons aged 5 years or over who speak English less than "very well"). Table 1 below presents data from this source regarding LEP languages in the county.

Spanish LEP speakers are the most populous by far, making up 10.7% of the county's total population and 75.8% of the LEP population. Haitian speakers are the second most populous LEP population in the county, making up 7.1% of the LEP population and 1% of the total population. The following three languages: Portuguese, Vietnamese, and Chinese, each make up approximately 3%-4% of the LEP population and about 0.5% of the total county population.

Table 1. LEP Languages in Orange County, FL

Language	Total Population (5 Years and Over) Who Speak English Less Than “Very Well”	% of LEP Population	% of Total Population
Spanish	140,008	75.8%	10.7%
Haitian	13,193	7.1%	1.0%
Portuguese	6,764	3.7%	0.5%
Vietnamese	6,542	3.5%	0.5%
Chinese (incl. Mandarin, Cantonese)	5,807	3.1%	0.4%
Arabic	2,632	1.4%	0.2%
Tagalog (incl. Filipino)	2,496	1.4%	0.2%
Hindi	1,327	0.7%	0.1%
Bengali	827	0.4%	0.1%
German	524	0.3%	0.0%
Malayalam, Kannada, or other Dravidian languages	517	0.3%	0.0%
Other Indo-European languages	489	0.3%	0.0%
Gujarati	475	0.3%	0.0%
French (incl. Cajun)	455	0.2%	0.0%
Other languages of Asia	436	0.2%	0.0%
Ukrainian or other Slavic languages	295	0.2%	0.0%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	294	0.2%	0.0%
Telugu	266	0.1%	0.0%
Italian	250	0.1%	0.0%
Other and unspecified languages	208	0.1%	0.0%
Tamil	141	0.1%	0.0%
Korean	131	0.1%	0.0%
Japanese	115	0.1%	0.0%
Greek	111	0.1%	0.0%
Serbo-Croatian	82	0.0%	0.0%
Urdu	75	0.0%	0.0%
Khmer	71	0.0%	0.0%

Language	Total Population (5 Years and Over) Who Speak English Less Than “Very Well”	% of LEP Population	% of Total Population
Persian (incl. Farsi, Dari)	53	0.0%	0.0%
Total LEP Population	184,716		14.1%
Total Population	1,309,758		100%

Source: 2021 ACS 1-Year Estimates, Table B16001

HUD outlines “safe harbor” guidelines for LEP persons in 72 FR 2732 (Table 2). Though adoption of the safe harbor criteria is not required, a language access plan operating within the criteria is considered to demonstrate strong evidence of compliance with HUD’s LEP requirements.

Table 2. Safe Harbor Criteria

Size of Language Group	Recommended Provision of Written Language Assistance	Languages Affected
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents	<ul style="list-style-type: none"> Spanish Haitian Portuguese Vietnamese Chinese (incl. Mandarin, Cantonese) Arabic Tagalog (incl. Filipino) Hindi
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents	<ul style="list-style-type: none"> Spanish
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents	None
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required	All other languages not named else in this table

Source: Federal Register Docket No. FR-4878-N-02, published January 22, 2007

As shown in Table 1, Spanish is the only language that exceeds the 5% safe harbor threshold in Orange County. Thus, all vital documents should be translated into Spanish. Several languages (e.g. Haitian, Portuguese, Vietnamese, etc.) exceed the 1,000-person safe harbor threshold, but are well below the 5% guideline, comprising 1% or less of the county’s total population.

Factor 2: Frequency of Contact with LEP Individuals

The Orange County Housing and Community Development Division's frequency of contact with LEP individuals varies depending on the program, and a definite count has not yet been conducted. However, Spanish LEP speakers are frequently encountered in all programs, and requests for translation and/or interpretation are common. Creole LEP speakers are also encountered regularly.

- The Down Payment Assistance (DPA) program has indirect contact with members of the public, though housing counseling workshops provide direct opportunities for public interactions. These workshops are currently offered in both Spanish and English. Flyers and lender guidelines are also published in English, Spanish, and Creole.
- Rental Assistance through the Housing Choice Voucher (Section 8) and Tenant Based Rental Assistance (TBRA) programs have direct contact with the public on a daily basis. Program staff estimate that they receive between 20%-25% request for translation/interpretation.
- The Housing Rehabilitation program encounters language barriers often. Currently, individuals can fill out a form that authorizes a designated individual to translate and communicate with staff.

Factor 3: Nature and Importance of the Program

Language access services are prioritized for programs, activities, and services with the greatest impact on LEP individuals. LEP outreach focuses on CDBG and CDBG-DR funded activities that provide direct benefits to participants. Programs that provide persons and businesses with disaster rehabilitation efforts can be of critical importance.

Factor 4: Resources Available to the County and Overall Costs

HCD is taking all reasonable steps to ensure meaningful access for LEP individuals to CDBG and CDBG-DR programs and activities. However, limited availability of resources may limit the provision of language services in some cases. The following section outlines the varied levels of support that HCD will provide to ensure efficient language access services to LEP persons.

Language Assistance Efforts

Translation of Vital Documents (High Effort)

A “vital document” is defined as one that...

HCD will translate all vital documents to Spanish. This translation will be prepared as a standard procedure due to the high percentage of LEP Spanish speakers in the area. Vital documents may be translated to other languages upon request.

Limited English Proficiency Coordinator (Medium Effort)

The Limited English Proficiency Coordinator will oversee the implementation of the Language Access Plan (LAP) and compliance across CDBG and CDBG-DR programs. The coordinator ensures that HCD staff recognize their responsibilities to provide LEP persons with meaningful access to information, programs, and services. The LEP coordinator will also serve as the point of contact if members of the public or HCD staff have questions or complaints about language access services:

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

Oral Interpretation (High Effort)

Certain events, such as housing counseling workshops, are currently held in both English and Spanish. Oral interpreters will be offered to residents for other events free of charge if requests are made within a timely manner.

“I Speak” Cards (Low Effort)

HCD will distribute the U.S. Census Bureau’s “I Speak” cards (Appendix A) to all public-facing departments and staff. These cards allow staff to identify LEP persons seeking access to programs and their language access needs.

Website (Low Effort)

All information on the Orange County, FL government’s website is also available in Spanish: (<https://espanol.orangecountyfl.net>). The website will also include resources for LEP residents, including translated vital documents, LEP Coordinator information, and more.

LEP Outreach (Medium Effort)

HCD will maintain a copy of the Language Access Plan on its website. The website will also contain notices of LEP clients’ language access rights and available services. These rights include:

- The right to qualified interpretation services at no cost;
- The right to not rely on family members or friends as interpreters; and

- The right to file grievances about the language access services provided (or lack thereof)

These notices will also be distributed alongside other public-facing documents, in lobbies/waiting rooms, and in local ethnic media outlets.

Training

HCD will provide training for all staff that directly interact with the public through CDBG and CDBG-DR programs. This training will ensure that staff understand how to provide meaningful language assistance services to LEP persons and includes:

- Definition of LEP persons;
- Federal and state regulations governing language access;
- Cultural sensitivity;
- Staff roles and responsibilities;
- Identifying the language needs of LEP persons;
- HCD language access procedures; and
- LAP complaints/appeals process

Monitoring

The LEP Coordinator will regularly monitor the Language Access Plan and make any updates needed. Data on the frequency of translation/interpretation requests will be reviewed carefully to ensure that HCD is meeting the needs of its clients. Updated Census data will also be reviewed to identify any demographic changes in Orange County's LEP service population.