

# ORANGE COUNTY, NY



## Office of Community Development Language Access Plan

RELATING TO THE ADMINISTRATION OF GRANT PROGRAMS PROVIDED TO ORANGE COUNTY BY  
THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

- COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)
  - HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)
    - EMERGENCY SOLUTIONS GRANT (ESG)

*February 2022*



## Community Development Block Grant (CDBG)

### Language Assessment

#### Four – Factor Analysis

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Mullin & Lonergan, on behalf of Orange County, NY, has conducted a local needs assessment to determine the relative presence of people who are LEP (anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English) in the Urban County communities of Orange County, the frequency with which people who are LEP come into contact with Orange County Office of Community Development (OCD) programs, the importance of such programs to Individuals with LEP, and the cost and resources available to provide language access and assistance to Individuals with LEP assisted by such programs. The intent of this analysis is to find a balance that ensures meaningful access to critical services by persons who are LEP while not imposing undue financial burden on the Office of Community Development.

**Factor 1 – Number or proportion of Individuals with LEP served or encountered in the eligible service area (including those persons who would be served or encountered if the persons received adequate outreach and the OCD provided sufficient language services)**

The County must prepare a plan to address the needs of persons with limited English proficiency. To consider these needs, we first identified what languages are spoken in the participating jurisdictions. There are 38 Town and Village participating jurisdictions in the Urban County CDBG program. The Cities of Middletown, Newburgh, and Port Jervis, as well as the Town of Palm Tree and the Village of Kiryas Joel do not currently participate in the Urban County Consortium. Since the latest data available is 2015, the Town of Palm Tree was not yet incorporated. The Cities of Middletown, Newburgh, and Port Jervis participate in the HOME Consortium. The American Community Survey (ACS) data provides reports on the characteristics of the county’s residents by language spoken at home and ability to speak English. The data indicated the following major language groups that have significant populations that speak English less than “very well” within the geographic limits of Orange County:

- Population in the participating jurisdictions age 5 and over 350,422
- Total LEP population 5 years of age and over 30,553
- Spanish-speaking people LEP population 5 years and over (13.7%) 28,420
- Spanish-speaking people that speak English less than “very well” (3.9%) 13,789

- Yiddish-speaking people LEP population 5 years and over (4.5%) 15,955
- Yiddish-speaking people that speak English less than “very well” (3.0%) 10,826

The above data demonstrates that most of the county’s LEP population is Spanish-speaking and Yiddish-speaking although there are many other languages spoken in the county. Spanish and Yiddish are the only language groups that meet the 5% or 1,000-person threshold for requiring written translation of vital documents. Arabic, Hebrew and Chinese speakers are increasing, but have not reached the 1,000-person threshold. Further, the actual number of persons requiring services from the county is likely to exclude children because the County typically utilizes CDBG dollars to fund public infrastructure programs that don’t provide direct benefit assistance; therefore, the number requiring LEP assistance is less.

Of the 10,826 Yiddish-speaking people that speak English less than “very well,” 10,468 live in the Village of Kiryas Joel. The Village does not participate in the Urban County therefore, only 358 Yiddish speaking persons speak English less than very well in the County’s eligible service area. The Yiddish speaking persons do not meet the LEP thresholds for the eligible service population. Within the Yiddish-speaking population there are various dialects of Yiddish spoken. The Town of Palm Tree incorporated after the 2015 Census data was collected. This town is not participating in the Urban County and is primarily Yiddish-speaking. The Yiddish population at the time of this count was concentrated in the Town of Monroe (which included the Village of Kiryas Joel and the area now known as the Town of Palm Tree) where it made up 44% of the population of that municipality.

While the County’s Chinese speaking population exceeds the 1,000-person threshold, only 714 of those speak English less than very well.

The Federal Register Notice published January 2007, which details guidance for conducting the Four Factor Analysis, provides that when fewer than 1,000 persons *and* fewer than 5% of the **eligible population** are considered LEP, no written translation is required. Therefore, written language assistance will include only Spanish translation of vital documents.

The County has consulted with the Orange County Chinese Association and has determined that the primary Chinese dialect in the County is Mandarin. The County will provide information and resources to the Association, translated to Mandarin, for distribution and notification of programs available. When newer, more reliable data is available, in particular Census datasets indicating Language Spoken at Home (Specifically, Table B16001), the County will conduct a new Four-Factor Analysis to determine if additional written translation is required.

Oral assistance shall be available to all persons that request it, regardless of language spoken.

The population of speakers varies between communities. The following communities have the larger numbers of persons who speak other languages. The percent of the total population that do not speak the language well is shown.:

- Town of Blooming Grove - Spanish (3% do not speak English well)
- Town of Mount Hope – Spanish (3.4% do not speak English well)

- Town of New Windsor – Spanish (3.6% do not speak English well)
- Town of Wallkill - Spanish (3.5% do not speak English well)
- Town of Woodbury - Spanish (3.5% do not speak English well)

**Factor 2 – The frequency with which persons with LEP come into contact with the Office of Community Development**

To determine the frequency with which persons with LEP come into contact with the Office of Community Development, the OCD reviewed the files for all of its direct service programs within the last four years and discussed LEP contacts with staff members that receive community members both in-person and over the telephone. As the OCD works primarily with municipalities, developers and non-profit agencies the OCD has very limited contact with individuals who are LEP. The OCD has not encountered any Individuals with LEP within the last four years. The OCD could encounter an Individual with LEP through a variety of ways: program applicants and participants in OCD funded programming; persons calling the OCD for information on OCD funded programs and services; public notices, public meetings and hearings; public access to agency websites; informational brochures intended for public distribution.

**Factor 3 – The nature and importance of the program, activity, service, or information provided by the Office of Community Development**

The services provided by the Orange County Office of Community Development are important as they relate to a client’s need for, or continued provision of, services.

**Factor 4 – Factors 1-3 are then balanced against the available resources and costs to the Office of Community Development**

Because the OCD has a bilingual Spanish speaking staff person, it is cost effective for the County to provide limited Spanish language oral interpretation for people who contact the OCD regarding program assistance. Written translation by this staff person may also be beneficial to an individual with LEP.

For Yiddish and Mandarin speaking populations, the County evaluated the cost effectiveness of translating and publishing every vital document and communication to these languages. The County maintains a contract with Language Link, which provides written translation materials on a cost per word basis. To translate the Notice of Public Hearing for the County’s FY2021 AAP, the cost per word for Chinese (Simplified) and Yiddish was \$0.16 and \$0.20, respectively. This is in addition to the cost to publish the notices in the newspaper. To publish one Notice of Public Hearing for an AAP in English in the newspaper, the County expends \$113. To publish one Notice of Public Hearing for an AAP in Spanish it is \$243 (\$113 to publish and 130.22 to translate). To publish one Notice of Public Hearing for an AAP in Chinese it is \$327 (\$175 to publish and \$152 to translate). To publish one Notice of Public Hearing for an AAP in Yiddish it is \$357 (\$175 to publish and \$182 to translate). Two public notices are required each year for the AAP, one is required for the CAPER and notices are also required for Substantial Amendments to the AAP.

To publish the three required notices in English is approximately \$339. To translate and publish in Spanish is \$729. To translate and publish in Chinese it is \$981. To translate and publish in Yiddish it is \$1071. Substantial Amendments, Con Plan and other required notices would be in addition to this annually. To publish the notices in English and translate and publish in Spanish, the County will expend a minimum of \$1068. To translate and publish the notices to Yiddish and Chinese the County would expend at minimum an additional \$2052. The County has determined that due to the infrequency with which the OCD encounters Individuals with LEP, its resources would be better spent to translate brief summaries of vital documents (such as the AAP, Consolidated Plan, CAPER, and availability of programs, services and language assistance) and distribute to that serve people with LEP for distribution to their contact lists, publication in e-news, and posting. The County shall provide written translations of vital documents in these languages upon request.

The Office of Community Development has identified the following costs associated with translation and other language assistance services:

<b>Language Service</b>	<b>Cost</b>
Translation of public notices: Spanish Chinese (Mandarin) Yiddish	\$130.22 \$152.00 (\$0.16/word) \$175.00 (\$0.20/word)
Publication of public notices in characters (Mandarin, Yiddish)	\$175.00 for each notice
Oral Translation using Language Link	\$0.63/minute
Translation of Web Content using Language Link	\$45.00/hour
Accessibility of Web Content Using Recite Me	\$2,700 (annual fee to translate existing web content)
Translation services at public hearings (upon request)	\$0.63/minute

# THE COUNTY OF ORANGE

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## Community Development Block Grant (CDBG)

# Language Access Plan

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### Introduction

The Orange County Office of Community Development (OCD) is committed to providing equal opportunity housing in a non-discriminatory manner, and in complying fully with all Federal, State and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. This includes complying with Title IV of the Civil Rights Act of 1964 to ensure meaningful access to programs and activities by people with Limited English Proficiency (LEP).

The purpose of this Language Access Plan (LAP) is to identify how the OCD will ensure its methods of administration of its programs serving the public will not have the effect of subjecting Individuals with LEP to mis-information because of their national origin, and to ensure that Individuals with LEP have full access to programs and services.

This LAP is subject to revision, amendment, and supplementation.

### Who is an individual with LEP?

For the purposes of this LAP, anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English may be an individual with LEP.

The OCD will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

### Interaction with OCD

OCD will record each encounter with an individual with LEP documenting their language assistance needs in a Language Access Log as seen in **Appendix D**. In addition, activity files for any direct service programs administered by the OCD will include a record of an individual's language assistance needs and their language of preference.

The OCD has determined it has had no interaction with Individuals with LEP within the last four years, but could encounter Individuals with LEP through a variety of ways: applicants and participants in direct services and programs; persons calling the Office for information on its programs and services; public notices, public meetings and hearings which are open to the public; public access to the OCD website; and informational brochures intended for public distribution.

## Language Access Plan Coordinator

All questions regarding this Language Access Plan can be directed to the Language Access Plan Coordinator, Nicole Andersen, Director of Community Development, 40 Matthews Street, Suite 307A, Goshen, NY 10924, Phone: (845) 615-3820, Email: [commdev@orangecountygov.com](mailto:commdev@orangecountygov.com). The Language Access Plan Coordinator will:

- Implement and monitor compliance with the LAP by collecting data on the Office of Community Development's provision of translation and interpretation services as described in the LAP
- Track the success of the LAP and modify it accordingly
- Coordinate staff training on language assistance services and the LAP
- Records encounters with and services provided to individuals with LEP
- Determine if signage is properly posted
- Collect data on the availability of translated materials
- Address complaints or grievances filed regarding language assistance services for individuals with LEP
- Take any other relevant measures

## Complaints

Information is provided to the public on the OCD's website about the right to file a complaint if an individual believes that he/she/they was/were not offered language assistance services by the OCD or if the services received were inadequate or improper. An "Access to Services in Your Language" Complaint Form is provided which solicits detailed information about the complaint along with instructions on how to submit the complaint. A copy of the complaint form is attached as **Appendix C** in English, Spanish and Chinese (Mandarin).

The Complaint form is a vital document and will be translated into Spanish. The form will be made available to the public on OCD's website.

Any compliant form received shall be forwarded to the Language Access Coordinator who shall record complaints and work to resolve issues promptly. Depending on the situation, corrective action may be taken in a collaborative fashion.

OCD staff will not retaliate or take other adverse action because an individual has filed a complaint alleging discrimination based on LEP status or needs.

## Identification of Languages Needs Within the Jurisdiction

It was determined through review of the US Census Bureau's American Fact Finder (Table B16001, 2015 Five Year Estimate)<sup>1</sup> for the County of Orange, as recommended by the U.S. Department of Housing and

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<sup>1</sup><https://data.census.gov/cedsci/table?text=B16001&g=0500000US36071&tid=ACSDT5Y2015.B16001&hidePreview=false>

Urban Development (HUD), that Spanish was the only language to meet the 4 factor analysis criteria (1 – Number or proportion of Individuals with LEP served or encountered in the eligible service area; 2 – Frequency of contact with the program; 3 – Importance of service, information, program or activity; 4 - Costs versus resources and benefits requiring translation of vital documents). According to Fact Finder per the American Community Survey 2015, there were 13,789 Spanish-speaking persons over the age of five years in the County of Orange who speaks English less than very well.

Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be serviced or likely to be affected or encountered. The OCD has determined that because there are more than 1,000 Spanish speakers in the County of Orange who speak English less than very well, the OCD will translate vital documents into Spanish.

Of the 10,826 Yiddish-speaking people that speak English less than “very well,” 10,468 live in the Village of Kiryas Joel. The Village does not participate in the Urban County therefore only 358 Yiddish speaking persons speak English less than very well in the County’s eligible service area. Yiddish speaking persons do not meet the LEP thresholds for the eligible service population. While the County’s Chinese speaking population exceeds the 1,000-person threshold, only 714 of those speak English less than very well. The Federal Register Notice published January 2007, which details guidance for conducting the Four Factor Analysis, provides that when fewer than 1,000 persons *and* fewer than 5% of the **eligible population** are considered LEP, no written translation is required. Therefore, written language assistance will include only Spanish translation of vital documents.

The OCD has consulted with the Orange County Chinese Association and has determined that the primary Chinese dialect written in the County is Mandarin. The County will provide information and resources to the Association, translated to Mandarin, for distribution and notification of programs available. When newer, more reliable data is available, the County will conduct a new Four-Factor Analysis to determine if additional written translation is required.

The next largest LEP populations were persons who speak Chinese, Korean, Arabic, Hebrew and Polish Languages and identified themselves as speaking English “less than well”. These are populations of 714 (Chinese) 345 (Korean), 281 (Arabic), 361 (Hebrew) and 339 (Polish) persons which is less than 1% of Orange County’s population of 350,422 of people over the age of five years, and less than 1,000 people. The OCD also took into consideration that while there are individuals with LEP in each language population, not all of them will seek assistance from the County’s programs and services as some of them are children and others will not need the type of services provided due to the nature of the activity and services provided. The OCD has determined that because there is less than 1% or 1,000 people in any of the other languages, it will not provide written translation of vital documents into these languages. However, the County will provide oral interpretation as needed to Individuals with LEP requesting such services.



Other language groups in Orange County had few Individuals with LEP and therefore did not meet the threshold to require written translation of vital documents into those languages. The OCD will provide oral interpretation as needed to Individuals with LEP requesting such services.

### Language Assistance Costs

The Office of Community Development has identified the following costs associated with translation and other language assistance services:

Language Service	Cost
Translation of public notices: Spanish Chinese (Mandarin) Yiddish	\$130.22 \$152.00 (\$0.16/word) \$175.00 (\$0.20/word)
Publication of public notices in Spanish	\$113.00 for each notice
Publication of public notices in characters (Mandarin, Yiddish)	\$175.00 for each notice
Oral Translation using Language Link	\$0.63/minute
Translation of Web Content using Language Link	\$45.00/hour
Accessibility of Web Content Using Recite Me	\$2,700 (annual fee to translate existing web content)
Translation services at public hearings (upon request)	\$0.63/minute

### Language Assistance Services

Based upon the four-factor analysis, the OCD will offer a variety of language services in order to maximize the accessibility of its programs to Individuals with LEP. In addition to the services outlined below, the OCD will also ensure all signage and program information is published in both English and Spanish, notifying contacts that language services are available. This information will also be made available in languages that may be identified in future Four Factor Analyses as requiring written translation.

All of the language assistance services described below will be utilized by the OCD subject to federal, state, and local laws and pursuant to the Orange County procurement policies and procedures. Further, language assistance services described below are subject to the availability of funding. Nothing contained herein shall limit the OCD from utilizing alternative means to carry out the intent of this LAP should the resources described below be unavailable for any reason.

## Written Translation

As stated above in Section III, the OCD has determined that because there are more than 1,000 Spanish speakers who speak English less than very well, the OCD will provide written translation of vital documents in Spanish. As of the date of the creation of this LAP, Spanish is the only language into which vital documents will be translated. Web content, program summaries and other information related to the Annual Plan and CAPER preparation will be translated to languages deemed appropriate by the County. This could include languages that are approaching the compliance thresholds. This is subject to change upon review of the LAP as discussed below.

Language Link will be used to translate all vital documents. Language Link uses only native-born linguists who have the most experience and are best qualified to handle the particular subject matter of each translation. Language Link has an entire department dedicated to managing, onboarding, and keeping all of linguists up to date. Language Link utilizes a variety of linguists in each relevant language, most with specific certifications such as ATA certification which is the most common for translators. Language Link's QA process includes a first linguist translating the document, then a second linguist performing a quality assessment to verify the accuracy and context of the translation.

## Vital Documents

HUD has defined "vital documents" to be those documents that are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and Individuals with LEP specifically. The OCD has conducted a review of its written materials it provides to determine which are critical to access the service and programs the OCD offers. The OCD will provide written translation to Spanish of all letters and communications with Spanish-speaking program applicants who have identified Spanish as their preferred language, as well as all vital documents identified below:

- Citizen Participation Plan
- Language Access Plan
- Public Notices (including public hearing notices related to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, Substantial Amendments)
- Applications and other program materials for Direct Service Programs
- Informational Brochures/Marketing for Direct Service Programs
- Policies & Procedures for Direct Service Programs
- Approval/Denial letters for Direct Service Programs
- The OCD's review of its written materials is continuing in nature and the list of vital documents may be supplemented, amended or modified as necessary.

The four Housing Authorities with jurisdiction in the County have access to documents already translated by HUD and can be utilized by the OCD, including:

- Application for Assistance
- Waiting List Inquiry Form

- Housing Choice Voucher, including Family Obligations
- *A Good Place to Live* brochure
- Brochure Explaining Rights Under the Americans with Disability Act
- Brochure Explaining Family Self-Sufficiency Program
- Brochure Explaining Housing Choice Voucher Home Ownership Program
- Family Obligations Checklist – Tenancy Addendum to Lease
- Authorization to Release Information with Privacy Act Statement
- Brochure Regarding Housing Discrimination
- Family Self-Sufficiency Contract
- Request for Tenancy Approval

### Web Content

Orange County utilizes Google Translate for translation of all Web Content into Spanish, Yiddish, Chinese and other languages as may be required by future Four Factor Analyses.

Orange County will use Recite Me, a cloud-based web accessibility assistive toolbar that allows website visitors to customize a site in a way that works best for them. Recite Me’s innovative assistive technology will make the Orange County website accessible and inclusive through a unique range of features. This easy to use software includes text to speech functionality, customizable styling features including text size and dimensions, font type, and color options, reading aids (ruler, screen mask, dictionary, text only mode, and magnifying glass) and a translation tool with over 100 languages, including 35 text to speech voices and translation of PDFs. Recite Me works across all devices, giving everyone the opportunity to access any information on the Community Development webpage. It will also assist in navigation from the main County website to the Community Development webpage.

### Oral interpretation

The OCD will make every effort to provide oral interpretation for all of its participants who have identified themselves as LEP and request services.

### Bilingual Staff

The OCD employs bilingual, Spanish-speaking staff in several positions to ensure there are sufficient personnel available to assist Spanish-speaking Individuals with LEP when needed. The County will rely on its inhouse staff to provide oral interpretation for persons contacting the OCD for direct benefit programs. In some instances, the material to be translated may exceed the staff person’s ability to provide an accurate oral translation. In those cases, the staff member will communicate to the potential beneficiary about oral and written translation services available to him/her by the OCD, including use of Language Link.

### Interpretation Services

When there is not a staff person who speaks the Individual with LEP’s primary language, the OCD will seek interpretation through a professional interpreter service. The County uses Language Link, which provides oral translation services. Instructions for staff on how to access this system are included in the Language Link materials, as well as in staff training.

The OCD's interactive response system includes lines and instructions in Spanish to assist callers in identifying language resources available to them. The OCD's Four Factor Analysis did not identify additional languages to be included in the interactive response system at the time of the writing of this plan.

In the event that the Individual with LEP's primary language is not widely spoken and the OCD is unable to locate a suitable interpreter through a professional interpreter service, the County may resort to other methods such as seeking community volunteers. As a last resort, in the case where the OCD is unable to find an acceptable interpreter within a time frame to effectively assist the client, the OCD may use an online translation website, such as Google Translate, in order to communicate via an in-office computer.

The OCD will also utilize the I Speak Card system to assist persons presenting for services that do not speak English. The I Speak Cards allow residents and program participants to identify their preferred language, which would assist OCD staff with connecting them to internal or external translators. The cards include instructions on referring residents and participants to Language Link if their particular language is not covered by in-house translators.

The OCD conducts at least two public hearings per year. Upon request, the OCD will provide oral translation services at the public hearing. Persons interested in attending the public hearing shall notify the OCD in advance of the public hearing that translation services are requested at the hearing. Information about requesting language access services and a deadline for making the request will be included in all public notices in the languages identified for written translation by the Four Factor Analysis (Spanish only in 2020).

#### Informal Interpreters

The OCD generally discourages the use of family members or other informal interpreters, but will allow the use of an interpreter of the Individuals with LEP choosing (including family members or a professional interpreter at the Individuals with LEP own expense) when the Individual with LEP rejects the County's free Language Access services. The County will document the offer and the Individual with LEP's subsequent rejection.

#### Process for Requesting Translation, Oral Interpretation or Translation of a Vital Document

Persons requiring translation or interpretation services may do so by calling the Orange County Office of Community Development during regular business hours at, or by emailing [commdev@orangecountygov.com](mailto:commdev@orangecountygov.com). During the pandemic, requests are limited to telephone or email (though the County's Website). Bilingual staff, as able, may provide further direction to how to request the translation. Requests received in languages other than English or Spanish will be translation by OCD staff using Language Link, and responded to in the requestor's preferred language. All staff are aware of how to contact Language Link to provide translation and interpretation services if a need arises.

Vital Documents identified in Appendix A are automatically translated to Spanish and linked on the County's Website. Other documents are available to be translated upon request, using the process described above. In addition, all Vital Documents are placed on the County's Website. Using Recite Me, as described in this Plan, the document will automatically be translated to the selected language.

## **Outreach**

The OCD will conduct outreach in a method that directly targets and is inclusive of Individuals with LEP identified through its bi-annual analysis. In addition, the OCD will advertise in accordance with various means identified in this section the availability of programs, services and language assistance services. All Public Notices and marketing advertisements, such as notification of public hearings and notices of the availability of direct service program applications, shall be published in Spanish as well as English, and the OCD will make the notices available in Spanish and distribute to organizations serving Spanish speaking people. The OCD may also participate in community-sponsored events and make presentations through community organizations to reach Individuals with LEP and ensure they are aware of the availability of LEP assistance.

Informational flyers and other communications posted in public spaces are translated into Spanish, and for those who identify Spanish as their preferred language, interviews and program briefings will be conducted in Spanish.

Information in English and Spanish is available to the public and to LEP communities regarding the language assistance services the County makes available free of charge. Signage in the Office of Community Development and Web Content are translated to Spanish, and the Community Development and telephone answering systems have Spanish translation.

In addition, the County will annually share information regarding its programs to all municipalities participating in the Urban County via its annual solicitation for applications. Within those outreach efforts, the County will require the municipalities participating in the Urban County to include in their outreach/public hearing notices requirements to comply with this Language Access Plan. Any municipality receiving CDBG funds that has more than 5% of its population or more than 1000 people as LEP persons of a specific language will translate their public notices and other vital documents into that language. The County will share its best practices with the municipalities for their use in implementation of the LAP.

Chinese has been identified as an LEP population, though it does not meet the threshold for requiring written translation of vital documents. Still, the OCD will translate summary documents in Mandarin, notifying this population of its available programs, free language assistance services, public hearings and other opportunities to participate in the County's planning processes. The notices and information will be shared with the Orange County Chinese Association for distribution to its membership and publication in its newsletter. The OCD believes this will be a more effective means of communication rather than publish public notices in Mandarin in the English-speaking newspapers.

The OCD has almost no or very limited contact with Yiddish-speaking clientele, as a majority of the LEP Yiddish speakers in the County live in a municipality that does not participate in the Urban County. The number of LEP Yiddish speakers living in the Urban County's eligible service area does not meet the threshold for written translation. However, all public notices will contain a statement, in Yiddish, that the notice, other information, and free language assistance are available in Yiddish upon request:

נאָך אינפֿאַרמאַציע און פֿריי שפּראַך הילף בנימצא אויף בעטן.

The County will also make attempts to reach out to religious organizations and other community organizations that serve Yiddish speakers to notify them that services are available as well as translation and language services.

For people who are LEP, but are not Spanish-speaking, the County will utilize a document created by the U.S. Census Bureau translated into 38 different languages to use as a tool to identify the client's primary language. The Office of Community Development will also publish a translated notice announcing the availability of primary language assistance services into as many languages as possible to be posted in the lobby of its building, on its Website, and will be distributed to interest groups known to be frequented by Individuals with LEP.

The County has developed a Language Bank, which will be made available to Individuals with LEP, letting them know the appropriate contact information and times available for language assistance. The Language Bank is included as **Appendix B** of this LAP.

## Staff Training

The OCD will provide training to all OCD staff on language access issues. The training will be provided to all new OCD employees as soon as practicable within 90 days of their first day of employment and to all existing OCD employees on an annual basis. OCD staff training includes the following components:

- The legal obligations as a recipient of funding from HUD to provide meaningful access to individuals with LEP including Section 109 regulatory requirements and Department of Justice LEP Guidance
- Results of the Four Factor Analysis
- The types of language assistance services available and how to access them
- The use of "I Speak" Cards and the appropriate way to use them
- How to access the Language Link services How to obtain written translation services
- How to work with interpreters
- A copy of this LAP will be provided to all new and existing OCD staff. OCD will provide training on its contents, what is required of staff under its policies, list of vital documents, and how to implement the LAP.
- Policies for documenting the language needs of individuals with LEP and the language services provided.

Though the Office of Community Development uses bilingual staff to provide informational translation and communication, it will not rely on staff to provide language services. Ongoing training and refresher courses will be encouraged, but not required for bilingual staff.

### **Monitoring and Updating of This LAP**

The OCD will review/revise this LAP on an as needed basis, but no less than every two years to ensure the populations of the various language groups within the jurisdiction and their needs are reflected in the provision of primary-language services. At that time, the Plan will be reviewed to determine if the existing LEP services are sufficient to meet the needs of individuals with LEP.

Events that will be considered indicators of the need for a review of the LAP and will also be utilized to identify the need for LEP assistance in other languages include, but are not limited to, LEP populations within the jurisdiction encountered or affected; frequency of encounters with LEP populations; and continued availability of existing resources and the addition of new resources. Release of updated, reliable Census datasets indicating Language Spoke at Home (Specifically, Table B16001) will also be a trigger for review of the LAP.

## Appendix A: Translation of Vital Documents

Document Name	Date Translated	Date translated into Spanish	Date translated into Chinese (Mandarin)	Date translated into Yiddish
Citizen Participation Plan	Yes	X	TBD- will be translated upon request	TBD- will be translated upon request
Language Access Plan	Yes	X	TBD- will be translated upon request	TBD- will be translated upon request
Public Notices (including public hearing notices related to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, Substantial Amendments)	Yes	Each public notice is translated to Spanish	Summaries of public notices will each be translated to Chinese (Mandarin)	All public notices will contain a statement, in Yiddish, that the notice, other information, and free language assistance are available in Yiddish upon request
Language Services Complaint Form	10/29/2020	10/29/2020	10/29/2020	NA
Applications for Direct Service Programs	Not applicable- OCD does not presently operate any direct service programs	NA	NA	NA
Informational Brochures/Marketing for Direct Service Programs	Not applicable- OCD does not presently operate any direct service programs	NA	NA	NA



Policies & Procedures for Direct Service Programs	Not applicable- OCD does not presently operate any direct service programs	NA	NA	NA
Approval/Denial letters for Direct Service Programs	Not applicable- OCD does not presently operate any direct service programs	NA	NA	NA
Letters and Communications with Individuals with LEP	Not applicable- OCD does not presently operate any direct service programs	NA	NA	NA

## Appendix B: Language Bank

Resource	Languages Served	Services Provided	Availability
Marisol Torres, Program Examiner  Erin Cousins, Project Manager	Spanish	Verbal communication, instruction for language assistance services, written translation	M-F 9 a.m. – 5 p.m.
Language Link	240 languages and dialects including Spanish, Mandarin, Yiddish	Over the Phone Interpretation  On-site interpretation  Video-Remote interpretation	24/7/365      24/7/365
Language Link	100 languages including Spanish, Mandarin, Yiddish	Document and electronic media translation services	

## Appendix C Complaint Form in English, Spanish and Chinese (Mandarin)

### Orange County Office of Community Development

40 Matthews Street, Suite 307A

Goshen, NY 10924

Phone: (845) 615-3820

**Language Access Coordinator: Nicole Andersen**

**E-mail: [nandersen@orangecountygov.com](mailto:nandersen@orangecountygov.com)**

### Access to Services in Your Language: Complaint Form

Orange County Office of Community Development's policy is to take reasonable steps to overcome language barriers to public services and programs. To do this, our goal is to 1) talk to you in your primary language and 2) provide vital forms and documents in a language you can understand, in addition to English.

Your comments on this form will help us towards that goal. **All information is confidential.**

Please print, sign, and the form with black ink and send it by mail or email to the address above.

#### Person making the complaint:

First name: \_\_\_\_\_ Last name: \_\_\_\_\_

Street address: \_\_\_\_\_

City, Town or Village: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Preferred language: \_\_\_\_\_

E-mail address (if available): \_\_\_\_\_

Home phone: (\_\_\_\_\_) \_\_\_\_\_ Other phone: (\_\_\_\_\_) \_\_\_\_\_

Is someone else helping you file this complaint? \_\_\_\_ Yes \_\_\_\_ No If "Yes", include their name:

First name: \_\_\_\_\_ Last name: \_\_\_\_\_

What was the problem? Check all the boxes that apply and explain below:

I was not offered an interpreter

I asked for an interpreter and was denied

The interpreter(s) or translator(s) were not good (list their names, if known)

The interpreter(s) made rude or inappropriate comments

The services took too long (explain below)

I was not given forms or notices in a language I can understand (list documents needed below)

I was unable to use services, programs or activities (explain below)

\_\_\_\_ Other (explain below)

When did the problem happen? Date (MM/DD/YYYY): \_\_\_\_\_ Time: \_\_\_\_ AM \_\_\_\_ PM

Where did the problem happen? \_\_\_\_\_

Describe what happened. Please be specific. Use additional pages as needed. Print your name on each sheet. List language, services, and documents needed. Include names, address, and phone number of people involved, if known.

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Did you complain to anyone in the Office of Community Development/Municipality/Organization? Who and what was the response? Please be specific.

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I certify that this statement is true to the best of my knowledge and belief.

Signature: \_\_\_\_\_ Date (MM/DD/YYYY): \_\_\_\_\_

**Do not write in this box. For office use only**

Date: \_\_\_\_\_ Reviewer: \_\_\_\_\_

Resolution: \_\_\_\_\_



## **Appendix E: List of Resources, Stakeholders, and Organizations serving LEP populations**

The following groups will be emailed public notices and direct service program marketing materials if applicable to provide meaningful outreach to individuals with LEP

ACCESS Supports for Living  
All municipalities participating in the Urban County and/or HOME Consortium  
Catholic Charities Community Services of Orange, Sullivan and Ulster  
Community Foundation of Orange and Sullivan  
Fearless- Domestic Violence Organization  
Habitat for Humanity of Greater Newburgh  
HONOR emergency housing group  
Hudson Valley Legal Services  
Hudson Valley Regional Food Bank  
Independent Living  
Mental Health Association of Orange County  
Middletown Housing Authority  
Newburgh Armory Unity Center  
Newburgh Housing Authority  
Newburgh Ministry Homeless Shelter  
Nobody Leaves Mid-Hudson  
Orange County Chinese Association  
Orange County Citizens Foundation  
Orange County Continuum of Care  
Orange County Department of Mental Health  
Orange County Department of Social Services  
Orange County Economic Development Office  
Orange County Human Rights Commission  
Orange County Jewish Family Services  
Orange County Office for the Aging  
Orange County Office of Employment and Training  
Orange County Veterans Agency  
Pathstone  
RECAP  
Rural Ulster Preservation Company (RUPCO)  
Safe Harbors  
Salvation Army  
The Arc of Orange County  
The Voz- Spanish Magazine  
WestCop  
Winslow Therapeutic Riding Center