

Liberty County
ADA/Section 504/Title VI/EEO Nondiscrimination Policy and Plan

Policy Statement:

The Liberty County Board of County Commissioners (The County) does not tolerate illegal discrimination in any of its programs, services or activities (including employment: hiring, promotion, compensation, working conditions, termination, etc.). Pursuant to the Americans with Disabilities Act of 1990, as amended (ADA), Section 504 of the Rehabilitation Act of 1973 (Section 504), Title VI of the Civil Rights Act of 1964 (Title VI) and other federal and state authorities, the County will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age, religion, or disability. Genetic information will not be used in a discriminatory manner for employment purposes. Housing discrimination based on familial status is also prohibited. A disabled person is defined as any person who (a) has a physical or mental impairment which substantially limits one or more major life activities, (b) has a record of such an impairment, or (c) is regarded as having such an impairment.

Note: For transit issues, refer to the County's ADA Transportation Service Policies and Procedures, and the Title VI and Nondiscrimination Policy and Plan.

Complaint Procedures:

The County has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been subjected to discrimination based upon race, color, national origin, sex, religion, age, or disability in any of the County's programs, services or activities (or also based upon familial status in housing, or genetic information in employment) may file a complaint with the County Nondiscrimination Coordinator:

Liberty County Clerk of Court (Kathleen Brown at the time of this policy adoption)

Post Office Box 399, Bristol, FL 32321

Street address is 10818 NW State Road 20

Phone 850-643-5404

Email kbrown@libertyclerk.com

Hearing Impaired: 711 (para Espanola-English 844-463-9710)

UPDATE:

CLERK: DANIEL STANLEY

EMAIL: dstanley@libertyclerk.com

PHONE: 850-643-2215

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, sex, religion, age, disability, familial status or genetic information), 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 Nondiscrimination Coordinator for assistance.

The Nondiscrimination Coordinator will respond to the complaint within fifteen (15) calendar days and will take reasonable steps to resolve the matter. Should the Coordinator be unable to satisfactorily resolve a complaint, with approval of the County Commission if necessary, the Coordinator will forward the complaint, along with a record of its disposition, to the appropriate party.

The County's Nondiscrimination Coordinator has 'easy access' to the County Commission Chairman (Chief Executive Officer - CEO) and is not required to obtain management or other approval to discuss discrimination issues with the CEO. However, should the complainant be unable or unwilling to complain to the County regarding a County program, facility or service funded by another agency, the written complaint may be submitted directly to the funding agency. For Community Development Block Grants, the funding agency is the Florida Department of Economic Opportunity.

For complaints regarding transportation, Florida Department of Transportation (FDOT) will serve as a clearing house, forwarding the complaint to the appropriate state or federal agency:

Florida Department of Transportation Equal Opportunity Office
ATTN: Title VI Complaint Processing
605 Suwannee Street MS 65
Tallahassee, FL 32399

For complaints regarding other issues, individuals may view the following website for the U.S. Department of Justice, where there are links for various types of complaint forms and contacts.
<http://www.justice.gov/crt/complaint/>

Equal Opportunity Employment Statement:

The County's workforce is very small, which prevents or severely limits the ability to transfer duties from an employee who is unable to perform them to another employee. Therefore, the County's employment process must focus on qualifications, reliability, integrity, work ethic, etc. of applicants for employment/promotion. However, the County will advertise for, solicit and employ well qualified individuals who are minorities and females, and will make reasonable accommodations for employees/applicants with disabilities. Genetic information will not be used in employment decisions. Additional information regarding EEO may be found in the current version of the County's Personnel Policy.

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 any person who (a) has a physical or mental impairment which substantially limits one or more major life activities, b) has a record of such an impairment, or c) is regarded as having such an impairment. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their

needs are equitably represented in transportation and other programs, services and activities.

The County will make reasonable effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities (as defined above). The County will make reasonable effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include, or at a minimum do not exclude, representation by the disabled community and disability service groups.

The County encourages the public to report any facility, program, service or activity that appears inaccessible to those who are disabled. Furthermore, the County will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, the County asks that requests be made at least 3 County business days prior to the need for accommodation.

Questions, concerns, comments or requests for accommodation should be made to the County's Nondiscrimination Coordinator (see Complaint Procedure, above).

Limited English Proficiency (LEP) Assistance:

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ), US Department of Transportation (DOT), and US Department of Housing and Urban Development require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services and activities by those who do not speak English proficiently. To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the County's programs, services or activities.
2. The frequency with which LEP individuals come in contact with these programs, services or activities.
3. The nature and importance of the program, service, or activity to people's lives and;
4. The resources available to the County and the likely costs of the LEP services.

1. Number or Proportion of LEP Persons

Using data from the U.S. Census Bureau, 2016 American Community Survey, it is estimated that only 278 individuals over the age of 5 speak English "less than very well". Of these individuals, 257 speak Spanish, and 21 speak a language other than Spanish. Of the Spanish speakers, 39 were under the age of 18, which means they are not receiving services or should not be using County facilities without adult supervision. The remaining 218 Spanish speakers represent only 2.6% of the entire County population of 8,365. This is the population that the County would potentially need to provide language assistance, although written translation of documents is not required for such a small number or percentage of the population. The County would not be expected to provide interpretation to the 21 who speak other languages, although an online

translation service might be used if necessary.

Some County facilities, such as streets and parks, are available to non-County residents. These facilities do not involve spoken English, and the signage is minimal. The County provides few or no direct services and programs available to non-County residents.

Given this information, the County reasons that there is minimal LEP population in the County or using County services.

2. Frequency of Contact with LEP

County staff report occasional contacts with LEP residents regarding water and garbage service or bills, and transit services.

3. Nature and Importance to People's Lives

Services/facilities provided to the public by the County include roads and pedestrian walkways, parks, water utilities, limited transit service, emergency management, SHIP housing, mosquito control, building permits and inspection, veterans service, and agricultural extension (jointly with the University of Florida). The courts also operate in the County, but provide translators as needed. Other local services are provided by various local and state entities (state health department, county school board, county sheriff, etc.) and not under the control of the Board of County Commissioners or the Clerk of Court. Although not all residents receive, utilize or need all services/facilities, each of these is important to many or most people.

4. Available Resources and Costs

The County has not received any formal requests for translation or interpretation of its programs, services or activities into Spanish or any other language.

The County has extremely limited financial resources. The small County budget is not adequate to include fee-based translation services or dual signage/documents.

The analyses of these factors suggest that formal LEP services are not required at this time. However, the County has committed to the following:

1. Develop a list of parties available to provide oral and written interpretation/translation services with reasonable notification, including voluntary and/or fee-based services. Distribute the translator list to staff that regularly have contact with the public.

The County understands that its community profile is changing and the four factor analysis may reveal the need for more or varied LEP services in the future. As such, it will examine its LEP plan approximately every four years to ensure that it remains reflective of the community's needs.

Persons requiring special language services should contact the Nondiscrimination Coordinator.

The transit service3 utilizes an interpreter who works with the Healthy Start Program.

Public Involvement and Outreach:

In order to plan for efficient, effective, safe, equitable and reliable services, programs, and facilities, the County must have the input of its public. The County encourages the participation of the entire community. The County holds a number of meetings, workshops and other events designed to gather public input on transportation, public facilities, housing and community services project planning and construction. Further, the County elected officials and staff attend and participate in other community events to promote its services to the public. Finally, the County is constantly seeking ways of measuring the effectiveness of its public involvement.

Persons wishing to request special presentations by the County, volunteer in any of its activities, or offer suggestions for improvement of County public involvement may contact:

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Data Collection:


The U. S. Department of Housing and Urban Development, Federal Highway Administration and other federal agency regulations require federal-aid recipients to collect racial, ethnic and other similar demographic data on beneficiaries of or those affected by programs, services and activities. The County accomplishes this through the use of U.S. Census Bureau data and reports, its community development consultant, grant application beneficiary surveys, records of social and other direct services provided to and/or applied for by individuals, and other methods. 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 its public involvement events. This information assists the County with improving its targeted outreach and measures of effectiveness. Self identification of personal data to the County will always be voluntary, and anonymous except for certain public record requirements. Moreover, the County will not release or otherwise use this data in any manner inconsistent with the federal and/or state regulations.

Approved by the Liberty County Board of County Commissioners the 9th day of August, 2018

Attest



Chairman, Board of County Commissioners



Clerk of Court and Clerk to the Board
of County Commissioners