

COMMUNITY CARE AND OUTREACH, INC.

Limited English Proficiency and Language Access Policy

Adopted by the Board of Directors - August 6, 2026

Organization	Community Care and Outreach, Inc.
Version	1.0
Effective Date	August 6, 2026
Approved By	Board of Directors, adopted August 6, 2026
Policy Owner	Executive Director / Civil Rights and Language Access Coordinator
Website	communitycareandoutreach.com

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This document is an organizational compliance policy. It should be reviewed periodically and updated when applicable law, grant conditions, or agency guidance changes.

Document Control and Adoption

Policy title	Limited English Proficiency and Language Access Policy
Organization	Community Care and Outreach, Inc.
Policy number	CR-LEP-001
Version	1.0
Effective date	August 6, 2026
Review cycle	At least annually and after material legal, program, or demographic changes
Records custodian	Civil Rights and Language Access Coordinator

Adoption status Adopted and effective August 6, 2026

Adoption record: This policy was approved and adopted by the Board of Directors on August 6, 2026 and is effective as of that date.

Implementation authorization: Mariana M. Fletcher is designated as Civil Rights and Language Access Coordinator. The public notice and operational procedures in this policy are authorized for implementation.

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1. Purpose and Policy Statement

Community Care and Outreach, Inc. is committed to providing individuals with limited English proficiency meaningful access to its programs, services, activities, technical assistance, training, education, outreach, and public information.

The organization will take reasonable and appropriate steps to prevent limited English proficiency from becoming a barrier to participation in, access to, or receipt of benefits from any program or activity. Language assistance will be provided without charge to the individual when it is reasonably necessary for meaningful access.

No person will be denied services, subjected to unequal treatment, or retaliated against because the person requests language assistance, uses an interpreter, files a language-access concern, or participates in a civil-rights review or complaint process.

This policy establishes an administrative framework. It does not create contractual rights or obligations beyond those required by applicable law, regulation, award terms, or binding agency action.

2. Legal Authority and Guiding Principles

This policy supports the organization's compliance with Title VI of the Civil Rights Act of 1964, EPA nondiscrimination regulations at 40 C.F.R. Part 7, applicable EPA financial-assistance terms and conditions, and the principles reflected in *Lau v. Nichols*, 414 U.S. 563 (1974).

The organization will apply the following principles:

- **Equal access:** eligible individuals should have a meaningful opportunity to understand and participate in programs and services.
- **Individualized response:** the type and level of assistance will reflect the person's communication needs and the importance of the program, service, or information.
- **Accuracy and impartiality:** qualified language professionals will be used when the communication is vital, technical, confidential, safety-related, eligibility-related, complaint-related, or legally significant.
- **No cost to the individual:** the organization will not require a person to pay for necessary language assistance.
- **Continuous improvement:** language-access practices will be reviewed as programs, service areas, and language needs change.

3. Scope

This policy applies to all programs and activities conducted by or on behalf of Community Care and Outreach, Inc., including EPA-funded activities, and to all modes of service delivery, including in-person, telephone, virtual, electronic, written, and website-based communication.

It applies to directors, officers, employees, volunteers, contractors, consultants, trainers, agents, and subrecipients when they communicate with or provide services to the public on the organization's behalf.

4. Definitions

Limited English proficiency (LEP): A person has limited English proficiency when the person does not speak English as a primary language and has a limited ability to read, write, speak, or understand English.

Meaningful access: Language assistance that enables an LEP individual to understand, participate in, and receive the benefits of a program or activity in a reasonably effective and timely manner.

Interpretation: Oral or signed communication that conveys spoken information from one language to another.

Translation: Written communication that conveys text from one language to another.

Qualified interpreter or translator: A person who has demonstrated language proficiency, understands the relevant terminology, can communicate accurately and impartially, and follows appropriate confidentiality and ethical standards.

Vital document or communication: Information that is critical to obtaining services, protecting health or safety, meeting a deadline, exercising a right, understanding an obligation, filing a complaint, or participating meaningfully in a program.

Language assistance: Interpretation, translation, bilingual communication, translated notices, oral explanation, captioning or transcripts when language-related, or another reasonable method of facilitating communication with an LEP individual.

5. Roles and Responsibilities

5.1 Board of Directors

- Approve this policy and material amendments.
- Provide oversight of civil-rights and language-access compliance.
- Authorize reasonable organizational expenditures necessary to implement the policy.
- Receive notice of material complaints, findings, or corrective actions, consistent with confidentiality requirements.

5.2 Executive Director

- Implement this policy and maintain operational procedures.
- Ensure that staff, contractors, and relevant partners understand their responsibilities.
- Allocate available resources based on assessed need, program importance, and applicable requirements.
- Report significant implementation issues to the Board.

5.3 Civil Rights and Language Access Coordinator

Unless the Board designates another individual, the coordinator is:

Name	Mariana M. Fletcher
Title	Executive Director / Civil Rights and Language Access Coordinator
Telephone	817-501-1198
Email	baxter.mariana@gmail.com
Mailing address	3706 Seymour Road, Apartment 147, Wichita Falls, Texas 76309

The coordinator will receive requests, arrange services, maintain records, review demographic and program information, coordinate complaints, monitor implementation, and recommend updates.

6. Language-Needs Assessment

At least annually, and when a new program or service area is added, the coordinator will conduct and document a practical language-needs assessment. The assessment will consider:

1. The number or proportion of LEP individuals eligible to be served or likely to be encountered;
2. The frequency with which LEP individuals are likely to interact with the program;
3. The nature and importance of the program, activity, service, or communication; and
4. The organization's available resources, including the cost and feasibility of language-assistance options.

Information sources may include EPA environmental-justice mapping resources, U.S. Census Bureau and American Community Survey data, TCEQ geographic data viewers, local government and utility information, registration data voluntarily provided, prior language-assistance requests, and input from participating communities and partner organizations.

The assessment will be retained with the organization's compliance records and used to identify priority languages, vital documents, outreach methods, and appropriate interpretation or translation arrangements.

7. Procedures for Providing Meaningful Access

7.1 Identifying a Language Need

A language need may be identified by the individual, a representative, staff observation, a registration response, an oral or written request, or another reasonable indicator. Staff will respectfully ask the person which language is preferred and what assistance is needed. Immigration or citizenship status will not be requested as a condition of language assistance.

7.2 Receiving and Documenting Requests

Requests may be made orally or in writing. The receiving person should promptly notify the coordinator and record the request using Appendix B or an equivalent secure system. The organization will not require unnecessary personal information.

7.3 Selecting an Appropriate Service

The coordinator will select a reasonable method based on the language-needs assessment, the individual circumstances, the urgency and importance of the communication, confidentiality, technical complexity, and available qualified resources. Options may include:

- Qualified in-person, telephone, or video interpretation;
- Qualified bilingual staff or contractors acting within their verified competence;
- Written translation of a vital document or a translated summary with qualified oral explanation;
- Multilingual notices or taglines explaining how to obtain free assistance;
- An accessible digital format, transcript, or captioning when it addresses the person's language-related communication need;
- Another method that provides effective and timely communication.

7.4 Timeliness and Advance Requests

The organization may encourage advance notice for scheduled events, but it will consider urgent and last-minute requests. A request will not be denied solely because it was not made by a preferred advance deadline.

7.5 Family Members, Friends, and Minors

An LEP individual will not be required to provide an interpreter. The organization will not ordinarily rely on a minor child to interpret. Family members or friends may be used only when the individual requests it and the circumstances do not present concerns about confidentiality, accuracy, impartiality, safety, legal rights, technical complexity, or undue pressure. The organization may provide an independent qualified interpreter when necessary to ensure effective communication.

7.6 Machine Translation

Automated translation tools may be used as a preliminary convenience for low-risk, nonvital information. They will not be the sole method for translating vital, technical, confidential, safety-related, complaint-related, eligibility-related, or legally significant information without appropriate human review.

7.7 Emergency or Safety Communications

When delay could affect health or safety, staff will use the most effective immediately available communication method and arrange qualified assistance as soon as practicable. Temporary emergency measures will be documented and reviewed.

8. Vital Documents and Public Communications

The coordinator will periodically identify documents and communications that are vital to meaningful participation. Examples may include:

- Program eligibility, application, registration, and participation instructions;
- Deadlines, required actions, and notices affecting access to services;
- Health, safety, drinking-water, wastewater, environmental-risk, or emergency information;
- Instructions necessary to receive technical assistance or attend training;
- Nondiscrimination notices, language-assistance notices, grievance procedures, and complaint forms;
- Decisions affecting access to a benefit, program, or service;
- Notices of rights, obligations, corrective actions, or appeal opportunities.

Depending on assessed need, the organization may provide a complete translation, a translated summary, a multilingual notice, a qualified oral interpretation, or another effective method. The method chosen will be documented when the communication is material.

9. Notice, Website Access, and Outreach

Community Care and Outreach, Inc. will provide reasonable notice that free language assistance is available. The public notice in Appendix A will be posted prominently on the organization's website and may also be included in registration materials, program announcements, training invitations, email communications, telephone messages, and other public-facing materials.

Where appropriate based on the language-needs assessment, notices will be provided in languages other than English. Website content will be structured so that essential text can be read by common assistive technologies and copied into approved translation workflows.

The organization will retain a dated screenshot or PDF showing the public notice as posted and will review the notice at least annually for accuracy.

10. Complaints, Nonretaliation, and Privacy

A person who believes that meaningful language access was not provided may contact the Civil Rights and Language Access Coordinator orally or in writing. Language assistance will be provided when reasonably necessary to submit or participate in the resolution of a complaint.

No director, officer, employee, volunteer, contractor, or agent may intimidate, threaten, coerce, discriminate against, or retaliate against a person because the person requested language assistance, raised a concern, filed a complaint, or participated in a review or investigation.

Records will be limited to information reasonably necessary for service delivery and compliance. Personally identifiable, complaint-related, and sensitive information will be stored securely and shared only with persons who have a legitimate operational, legal, or oversight need.

11. Training, Monitoring, and Recordkeeping

11.1 Training

Directors, employees, volunteers, contractors, and others responsible for public communication or program delivery will receive information appropriate to their roles, including how to identify a language need, contact the coordinator, arrange services, protect confidentiality, avoid inappropriate reliance on minors, and document assistance.

11.2 Monitoring

The coordinator will periodically review requests, services provided, complaints, participant feedback, demographic information, website notices, vendor capability, and program changes. Corrective actions will be documented and tracked to completion.

11.3 Records

The organization will maintain records sufficient to demonstrate implementation, including language-needs assessments, requests and responses, interpreter or translation arrangements, vital-document decisions, public notices, training records, complaints, corrective actions, and policy approvals.

Records related to an EPA-funded project will be retained for at least the period required by applicable federal record-retention rules, award terms, and 40 C.F.R. Part 7, and longer when an audit, complaint, investigation, litigation, or corrective action remains unresolved.

12. Review, Amendment, and Severability

The Board or its authorized designee will review this policy at least annually and after a material change in law, EPA requirements, grant conditions, organizational programs, service areas, languages encountered, or available resources.

The Executive Director may adopt nonmaterial administrative procedures consistent with this policy. Material policy changes should be presented to the Board for approval.

If any provision is found invalid or inconsistent with controlling law, the remaining provisions will remain in effect, and the organization will revise the affected provision promptly.

Policy Approval

Approved and adopted by the Board of Directors of Community Care and Outreach, Inc. on August 6, 2026.

Mariana M. Fletcher Board President - Typed Signature 	August 6, 2026 Date
Michele Petersen Board Secretary - Typed Signature 	August 6, 2026 Date
Policy number CR-LEP-001	Version 1.0
Effective date August 6, 2026	Review cycle At least annually

Appendix A - Website-Ready Public Language Assistance Notice

Post this notice on a clearly labeled webpage, such as “Nondiscrimination and Language Access,” and link to it from the website footer or another prominent location.

FREE LANGUAGE ASSISTANCE

Community Care and Outreach, Inc. provides language assistance at no cost to individuals who have difficulty reading, writing, speaking, or understanding English. To request an interpreter, translated information, or assistance in another language, contact:

Mariana M. Fletcher
Executive Director / Civil Rights and Language Access Coordinator
817-501-1198 | baxter.mariana@gmail.com

Requests may be made orally or in writing. Community Care and Outreach, Inc. will take reasonable steps to provide accurate and timely language assistance based on the individual's needs and the nature and importance of the program or service. Requesting language assistance will not affect eligibility for or access to services.

ASISTENCIA LINGÜÍSTICA GRATUITA

Community Care and Outreach, Inc. ofrece asistencia lingüística gratuita a las personas que tengan dificultad para leer, escribir, hablar o comprender inglés. Para solicitar un intérprete, información traducida o ayuda en otro idioma, comuníquese con Mariana M. Fletcher al 817-501-1198 o baxter.mariana@gmail.com.

Las solicitudes pueden hacerse verbalmente o por escrito. Solicitar asistencia lingüística no afectará la elegibilidad ni el acceso a los servicios.

Recommended Website Placement

- Publish the notice as selectable webpage text, not only as an image or scanned PDF.
- Add a visible footer link labeled “Nondiscrimination and Language Access.”
- Keep the coordinator's telephone number and email current.
- Retain a dated screenshot or PDF of the live page in the compliance file.
- Add additional languages when the documented language-needs assessment shows they are appropriate.

Appendix B - Language Assistance Request and Service Record

Use this template or an equivalent secure system. Collect only information reasonably necessary to arrange and document assistance.

Date request received	
Program, event, or service	
Preferred language	
Requester contact information (only if needed)	
Assistance requested	
Urgency or deadline	
Method selected	
Interpreter / translator / provider	
Date and time service provided	
Outcome and follow-up	
Coordinator initials / date closed	

Privacy note: Do not record immigration status. Avoid recording diagnosis, complaint details, or other sensitive information in this general record; use a restricted file when additional detail is necessary.

Appendix C - Board Resolution Adopting the Policy

RESOLUTION OF THE BOARD OF DIRECTORS OF COMMUNITY CARE AND OUTREACH, INC.

The Board of Directors of Community Care and Outreach, Inc., a Texas nonprofit corporation, adopts the following resolution:

WHEREAS, the organization seeks to provide equitable and meaningful access to its programs, services, technical assistance, training, education, outreach, and public information;

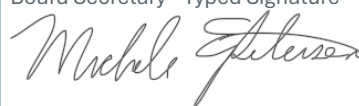
WHEREAS, the organization may receive federal financial assistance and is committed to compliance with applicable civil-rights and nondiscrimination requirements;

WHEREAS, the Board has reviewed the Limited English Proficiency and Language Access Policy, Policy No. CR-LEP-001, Version 1.0;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors hereby:

5. Approves and adopts the Limited English Proficiency and Language Access Policy, effective as of the date of this resolution;
6. Designates Mariana M. Fletcher, Executive Director, as the Civil Rights and Language Access Coordinator unless and until the Board designates another person;
7. Authorizes publication of the public language-assistance notice on the organization's website and other appropriate public-facing materials;
8. Authorizes the Executive Director to implement administrative procedures, arrange qualified interpretation and translation services, maintain compliance records, and make nonmaterial updates consistent with the policy;
9. Directs that material amendments be returned to the Board for approval; and
10. Directs that this resolution and the adopted policy be retained with the organization's official corporate records and meeting minutes.

ADOPTED by the Board of Directors on August 6, 2026.

Mariana M. Fletcher Board President - Printed Name	Mariana M. Fletcher Board President - Typed Signature August 6, 2026 
Michele Petersen Board Secretary - Printed Name	Michele Petersen Board Secretary - Typed Signature August 6, 2026 

Certification by Michele Petersen, Secretary: I certify that the foregoing resolution was duly adopted on August 6, 2026 and remains in effect.

Appendix D - Authorities and References

Title VI of the Civil Rights Act of 1964: 42 U.S.C. § 2000d et seq.

EPA nondiscrimination regulations: 40 C.F.R. Part 7, including §§ 7.35, 7.85, 7.95, and 7.100.

Lau v. Nichols: 414 U.S. 563 (1974).

EPA - Assisting People with Limited English Proficiency: EPA notes that its language-access materials are under review and may be updated. The organization should check current EPA requirements before each major review or federal submission.