

Municipal & County Title VI Compliance Audit & Action Plan

A 4-Factor Readiness Checklist for City
Managers, County Administrators &
Municipal Attorneys

CITY HALL

INGCO INTERNATIONAL

Public safety
and justice
cannot depend
on English
fluency. True
community
resilience
begins when
every resident
is heard.

Executive Summary



Under Title VI of the Civil Rights Act of 1964 and federal grant guidelines, local governments receiving federal financial assistance (DOT, HUD, HHS, DOJ) must take reasonable steps to ensure Limited English Proficient (LEP) residents have meaningful access to public services, notices, and meetings.

This audit tool is designed for **City Managers, County Administrators, Title VI Coordinators, Municipal Attorneys, and Department Heads** to evaluate language access compliance, protect federal grant eligibility, and eliminate operational liability.

The DOJ Four-Factor Assessment Worksheet

Complete this assessment annually to document your jurisdiction's Title VI compliance baseline:

- ☐ **Factor 1: Demographic Baseline.** Have you pulled updated U.S. Census / ACS language data for your city/county within the last 24 months to identify primary LEP populations?
- ☐ **Factor 2: Touchpoint Frequency.** Does your government track and log primary language preferences at key service counters (e.g., public health, permitting, courts, utility billing)?
- ☐ **Factor 3: Criticality Rating.** Have you categorized municipal services into "High Criticality" (Public Safety, Emergency Alerts, Health, Courts) vs. "General Administrative" touchpoints?
- ☐ **Factor 4: Resource Efficiency.** Does your government utilize a centralized master service agreement for language access to manage costs while ensuring 24/7 coverage?



Department Operational *Audit Checklist*

- ☐ **911 & Dispatch Access:** Do emergency dispatchers have immediate access to 24/7 Over-the-Phone Interpreting (OPI) that connects in under 60 seconds?
- ☐ **Field Operations (Police & Fire):** Do patrol officers and first responders have mobile access to on-demand video or phone interpreters for field encounters?
- ☐ **Municipal Court Processing:** Are court interpreters certified and trained specifically in legal and administrative court proceedings?
- ☐ **Pre-Translated Emergency Alerts:** Are message templates for severe weather, water boil alerts, and evacuations pre-translated into top municipal languages?



Vital Document Translation & Civic Engagement

- ☐ **Vital Administrative Documentation:** Are essential public documents (property tax notices, zoning applications, housing authority forms, utility disconnection warnings) translated by qualified human linguists?
- ☐ **Notice of Free Language Assistance:** Are "I Speak" language identification cards and Title VI non-discrimination notices posted visibly in all public-facing municipal buildings?
- ☐ **Public Meetings & Town Halls:** Is there an established workflow for residents to request simultaneous interpretation for City Council or County Board meetings?
- ☐ **Digital & Web Portal Accuracy:** Are vital online forms and web portals localized by human linguists rather than relying exclusively on unverified automated browser plugins?



Governance, Staff *Training & Contracting*

- ☐ **Written Language Access Plan (LAP):** Does your city or county maintain a formally approved, written Title VI Language Access Plan accessible to the public?
- ☐ **Annual Staff Protocol Training:** Are front-desk staff, clerks, and department heads trained annually on how to access live interpreters and request document translation?
- ☐ **Centralized Contract Management:** Is language access spending consolidated across departments under a single master agreement to eliminate minimum-hour fees and inflated ad-hoc rates?
- ☐ **Vetted Vendor Compliance:** Does your language service provider use specialized human linguists who adhere to professional ethics, confidentiality, and municipal standards?



Scoring & *Risk Matrix*

Next Steps for Civic Leaders

Achieving full Title VI and IDEA compliance is an ongoing operational commitment. Count your total checked items across Parts 1 and 2, sixteen items total.

If you have unmanaged compliance gaps, particularly in Emergency Operations, vital document translation, or front-office access, our team of specialized **Wordologists™** is here to help you seal those gaps before your next audit.

Items Checked	Readiness Level	Recommended Action
14 – 16	Low Risk / Compliant	Strong alignment. Conduct annual reviews and update demographic data.
10 – 13	Moderate Federal Exposure	Gaps present in vital document translation or digital access. Remediate before next grant review cycle.
Below 10	High Title VI Risk	Significant exposure to federal compliance audits, VCAs, and grant freezes. Schedule an immediate consultation.



A city's services are only as accessible as the languages they speak.

Unseal language barriers to open the door to true equity.

Partner With *INGCO International*



Navigating public sector language access doesn't have to strain local budgets. **INGCO International** partners with Midwest cities, counties, and state agencies to deliver airtight, FERPA/HIPAA/Title VI-compliant language solutions.

- **24/7 On-Demand VRI & OPI:** Connect to an interpreter in under 60 seconds for front desks and emergency response.
- **Municipal Subject-Matter Specialists:** Linguists trained in legal, public safety, and municipal administration.
- **Cost-Consolidated Master Contracts:** Eliminate departmental overlap and streamline municipal spending.

Ready to seal your compliance gaps before your next federal grant review?

✉ **Contact us:** info@ingcointernational.com

🌐 **Visit:** ingcointernational.com

☎ **Call:** 612-605-8006

A woman with blonde hair, wearing an orange hard hat and safety glasses, is smiling and looking at a clipboard held by a man. The man is wearing a white hard hat and safety glasses, and is holding a blue pen. They are standing on a construction site with a brick wall and a large pipe in the background. In the background, two other people are visible, one holding a large sheet of paper. The text is overlaid in a dark blue, serif font.

**Government works
best when every
resident has a voice.
Language access isn't
just a policy, it is the
foundation of civic
trust.**