

Language Access Plan

**Coffee County, Georgia
Community Development Department
January 2022
Updated December 2022**



**101 South Peterson Avenue
Douglas, GA 31533
912-384-4799**

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LANGUAGE ACCESS PLAN

I. GENERAL INFORMATION

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List of Current Applicable Funded Grants/Programs (to be automatically amended as projects are funded):

1. Grantee: Coffee County, GA
CDBG Grant Number: MITINF-1-009
Target Area: Bounded by Riverbend Estate Road, River Run Road, River Bank Drive, and Riverdale Drive
(Coffee County: Census Table S1601 - 4.8% LEP)
2. Grantee: Coffee County, GA
CDBG Grant Number: 22p-y-034-1-6274
Target Area: Jacobs Circle and Daniels Way
(Coffee County: Census Table S1601 - 4.8% LEP)

This *Language Access Plan* has been prepared to address Coffee County's responsibilities as a recipient of federal financial assistance from Georgia Department of Community Affairs programs & grants funded by HUD as they relate to the needs of individuals with limited English language skills.

The plan has been prepared to ensure compliance with HUD's guidance and Title VI of the Civil Rights Act of 1964, and its implementing regulations. Under HUD's guidance, Coffee County must take reasonable steps to ensure meaningful access to their programs and activities by persons with Limited English Proficiency (LEP).

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish

guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Coffee County.

The Coffee County Commission has developed this *Language Access Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided through programs funded by the Georgia Department of Community Affairs/HUD. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Coffee County used HUD's four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Community Improvement programs;
2. The frequency with which LEP persons come in contact with Community Improvement programs;
3. The nature and importance of the Community Improvement programs and services provided by Coffee County to the LEP population;
4. The resources available to Coffee County and overall cost to provide LEP assistance.

SAFE HARBORS

In accordance with HUD Safe Harbors for LEP, Coffee County will translate written Community Improvement documents for groups that are at least 5% of the population eligible (and more than 50 persons) or 1,000 persons, whichever is less. If there are fewer than 50 persons in a language group that reaches the 5% trigger above, Coffee County will not translate the vital Community Improvement written materials, but provides written notice in the primary language of the LEP group of the right to receive competent oral interpretation of those written materials, free of cost.

The size of the language group determines the recommended provision for written language assistance.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the programs.

The Coffee County Commission reviewed the 2015-2020 American Community Survey 5-year estimates and determined that of the population of 40,137 persons over 5 years of age, 4,680 persons in Coffee County (11.7% of the total population) speak a language other than English. Of those 4,680 persons, 1,914 (4.8% of the total population & 40.9% of the population speaking a language other than English) have limited English proficiency; that is, they speak English less than “very well”. In Coffee County, 1,648 of those persons with limited English proficiency speak Spanish.

This does meet the threshold described above for translating vital documents. Oral Interpretation Services are available for clients upon request. However, in the past, all of our clients have provided their own translator with whom they are comfortable sharing personal information.

Language Spoken*	# of Residents Over 5 Years of Age*	Speaks English Less Than “Very Well”*
English	35,457 (88.3%)	N/A
Spanish	3,753 (9.4%)	1,648 (4.11%)
Other Indo-European	756 (1.9%)	211 (0.52%)
Asian & Pacific	88 (0.2%)	28 (0.06%)
Other Languages	83 (0.2%)	27 (0.07%)
Total	40,137 (100.0%)	1,914 (4.76%)

2. The frequency with which LEP persons come in contact with Community Development programs.

The Coffee County Community Development staff reviewed the frequency with which staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits, as well as public hearings and interactions during surveys. Over the past two years, Community Development has had no requests for interpreters and no requests for translated program documents.

Frequency of Interaction: Annually

For Project Applications:

- a. When notifying the public about the potential grant and activities
- b. When surveying income in the target area
- c. When determining preliminary eligibility for housing activities

For Homeowner Rehabilitation/Reconstruction/Down-Payment Assistance:

- a. When notifying the public about the grant award and activities
- b. When seeking applicants to participate in the program.
- c. When seeking qualified contractors
- d. When working with homeowners selected for assistance

3. The nature and importance of programs, activities or services provided by the Public Works Department to the LEP population.

Community Development plays a critical role in maintaining quality of life. The primary objective is the development of viable communities through improvement of living conditions, housing and the expansion of economic opportunities in cities and counties. Outreach throughout the community helps to ensure awareness of our programs. The majority of the County's population (88.3%) speak English. Other than English speaking individuals, Community Development staff are most likely to encounter Spanish speaking LEP individuals through office visits, phone conversations and during surveys. Upon client request, the Community Development staff will provide oral interpreters using bi-lingual employees or qualified contract interpreters. To date, all LEP individuals have provided their own interpreter, whether a child or a friend.

Nature of the Program(s): Street Paving, Flood and Drainage Improvements, Housing Activities, Public Facilities, and Economic Development.

Importance of the Program(s): Denial or delay of access to services or information would not have serious or life-threatening implications for the LEP individual.

4. The resources available to Coffee County, and overall cost to provide LEP assistance.

The Coffee County Commission reviewed its available resources that could be used for providing LEP assistance, including which of its documents would be most valuable to be translated if the need should arise. An "I Speak" card/poster will be made available to determine needed language translations. A notice (see below) will be posted in all ads for GA DCA/HUD programs regarding who to contact should language assistance be needed. Language translation, if needed, would be provided through the available bi-lingual staff and/or the Language Line (866-874-3972) for which Coffee County would pay a fee.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Community Development services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

The Name of the individual at the Coffee County Commission responsible for coordination of LEP Compliance is:

County Clerk Tracie Vickers
Coffee County Commissioners
101 South Peterson Avenue
Douglas, Ga 31533
(912) 384-4799

How the Public Works Department staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation services free of charge in languages LEP persons would understand;
- Add statement (see below) to public meeting and event notices concerning GA DCA/HUD programs;
- All Community Development staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year; and
- When Community Development staff conducts a Public Hearing, an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event (unless previously requested) it will help identify the need for future events; and
- Language Identification Cards/Posters will be used as necessary to determine a client's language needs.

Language Assistance Measures-As there is a small percentage in Coffee County of eligible LEP households, that is, persons who speak English "less than very well", it will offer the following measures:

1. The Community Development staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

2. Language Identification Cards/Posters will be used as necessary to determine a client's language needs

3. The following Interpretation resources will be available to accommodate LEP persons:

- Interpreters for the Spanish language will be provided within a reasonable time period; or
- Language interpretation will be accessed through Language Line Solutions.

4. The following statements will be added to public meeting and event notices concerning GA DCA/HUD programs:

“Persons with special needs relating to handicapped accessibility or foreign language should contact County Clerk Tracie Vickers at 912-384-4799 before _____. This person can be located at the County Commissioners Office, 101 South Peterson Avenue, Douglas, GA 31533, and is available between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, except holidays, or you may call 912-384-4799. Persons with hearing disabilities may consider using the Georgia Relay Service, at (TDD) 1-800-255-0056 or (Voice) 1-800-255-0135.”

IV. STAFF TRAINING

The following training will be provided to all Community Development staff:

- Information on the Title VI Policy and LEP responsibilities;
- Description of language assistance services offered to the public;
- Documentation of language assistance requests; and
- How to handle a potential Title VI/LEP complaint.

All contractors, subcontractors and sub-recipients performing work for or receiving federal funds for Community Development projects will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

- The Coffee County Commission does have to translate vital documents because a percentage and amount of its population is LEP (Spanish language).
- The Coffee County Commission does not currently have a formal outreach procedure since no requests for translation or interpretation have occurred in the past. The Coffee County Court system does offer translation at no cost to individuals. Information concerning the LAP policy will be posted on the Coffee County website and at the County Commission office. Translation resources have been identified.

The following list of Vital Documents will be translated and made available:

Vital Document	Timetable of Implementation
CDBG/CHIP Survey Forms	Prior to Pre-Application Public Hearing
CDBG Housing Rehabilitation/ Reconstruction/Down-Payment Assistance Application Forms & Materials	Prior to Pre-Application Public Hearing
CHIP Housing Rehabilitation/Reconstruction/Down-Payment Assistance Application Forms & Materials	Within 60 Days of Award

CDBG/CHIP Meeting Ads, Agendas and Meeting Information	Prior to any Public Hearings or Meetings
GA DCA/HUD Brochures and Posters	On Permanent Display and/or Printed As Required
Fair Housing Materials	On Permanent Display and/or Printed As Required

As the Coffee County documents are reprinted the following statement will be added in English and Spanish:

“If you require an oral interpretation in a language other than English, please call 912-384-4799.”

“Si require una interpretacion oral en um idioma que no sea ingles, por favor llame al 912-384-4799.”

VI. MONITORING AND UPDATING THE LAP PLAN

The Coffee County Commission will update the LAP Plan as required. At a minimum, the plan will be reviewed and updated every five years using American Fact Finder for census information, or when it is clear that higher concentrations of LEP individuals are present in Coffee County. Updates will include the following:

- The number of documented LEP person contacts encountered annually;
- How the needs of LEP persons have been addressed;
- Determination of the current LEP population in the service area;
- Determination as to whether the need for translation services has changed;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether Coffee County’s financial resources are sufficient to fund language assistance resources needed;
- Determine whether Coffee County fully complies with the goals of this LAP Plan; and
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF COFFEE COUNTY’S LAP PLAN

The LAP Plan will be on the Coffee County website page and provided to anyone requesting the information.

VIII. RECORDS

The Coffee County Commission will maintain records in the County Clerk's office regarding its efforts to comply with Title VI LEP obligations. These records will be reviewed periodically and open to the public in an effort to improve service.

IX. COMPLAINTS/FINDINGS

Any person who believes they have been denied the benefits of this LAP or that Coffee County has not complied with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations may file a complaint with the County LAP Coordinator. The County LAP Coordinator may be the first point of contact for any complaints or appeals, but the DCA LAP Coordinator must be informed of all complaints and appeals. The LAP Coordinator will provide oversight of the complaint/appeal resolution process. To file a complaint, submit the written complaint to:

County Clerk Tracie Vickers
Coffee County
101 South Peterson Avenue
Douglas, GA 31533
(912) 384-4799

Or

DCA 504 Coordinator
60 Executive Park South, N.E.
Atlanta, Georgia 30329-2231
fairhousing@dca.ga.gov

X. AVAILABLE FEDERAL LEP RESOURCES

HUD's LEP Website:

<http://www.hud.gov/offices/ftheo/lep.xml>

Federal LEP Website:

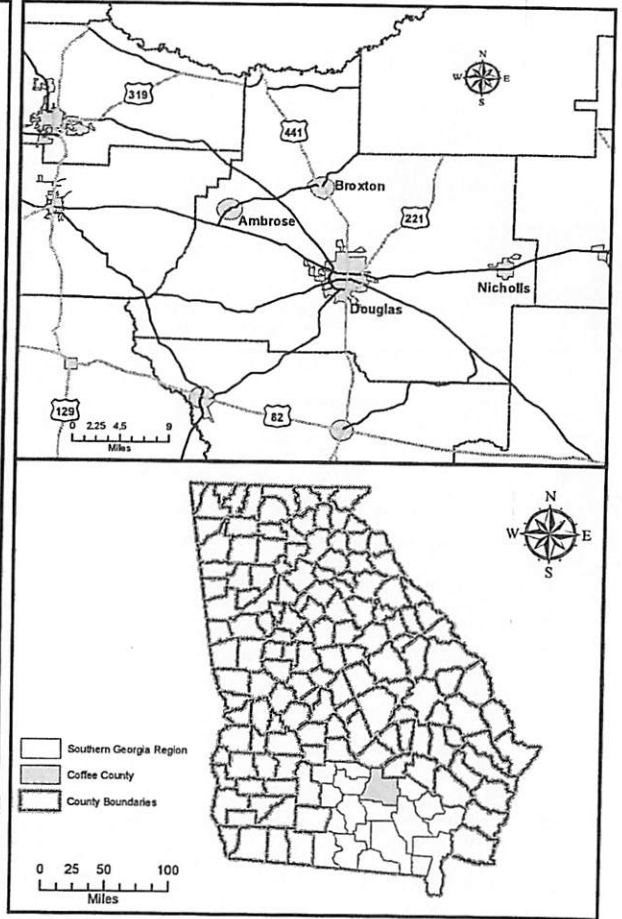
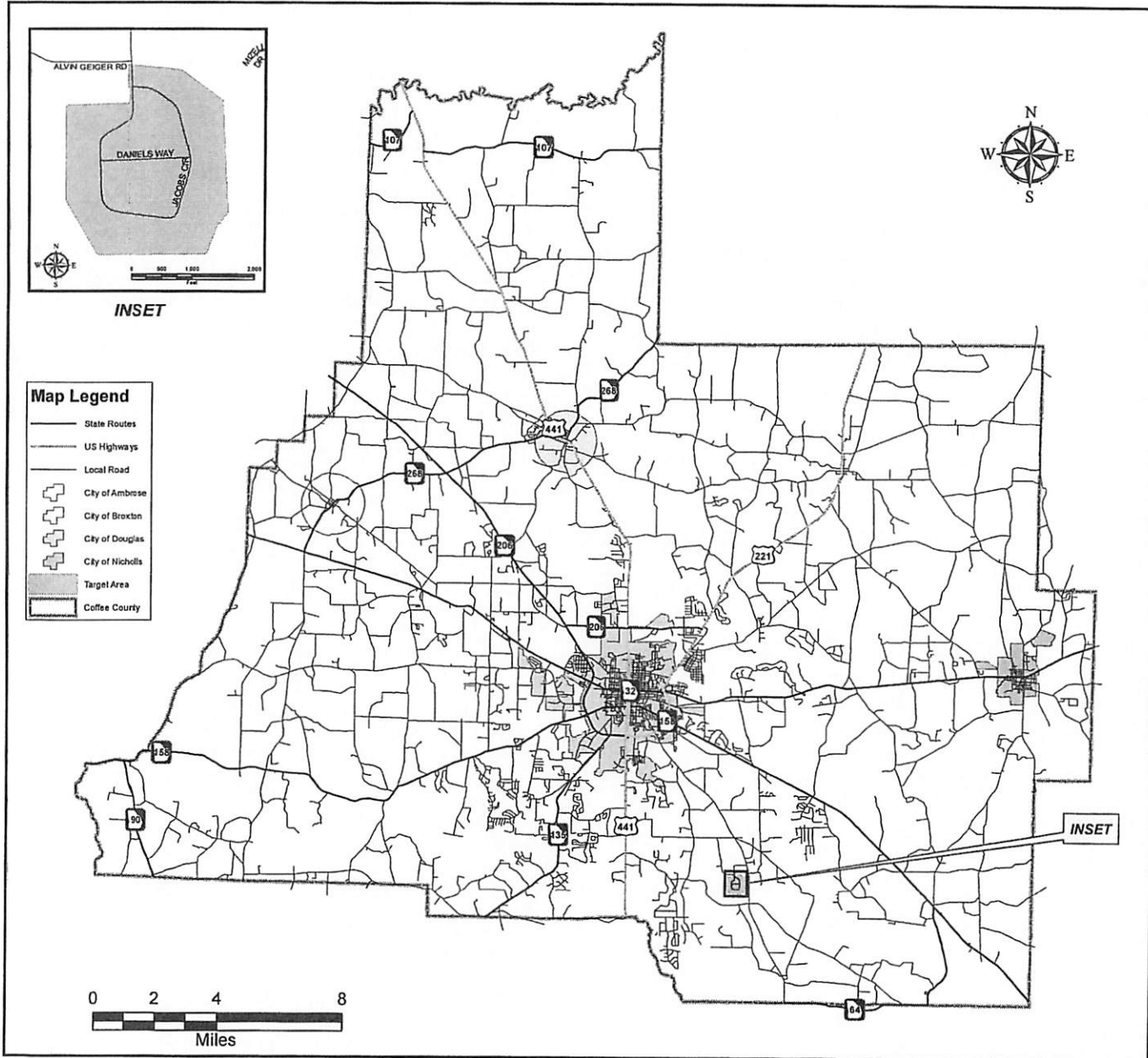
<http://www.lep.gov/>

LEP and Title VI Videos:

<http://www.lep.gov/video/video.html>

"I Speak" Card:

<http://www.lep.gov/ISpeakCards2004.pdf>



Coffee County CDBG 2022 Applicant Location Map 1 of 3

Map created May 2022 for general planning purposes only. Refer all questions on data accuracy and availability to the Southern Georgia Regional Commission.

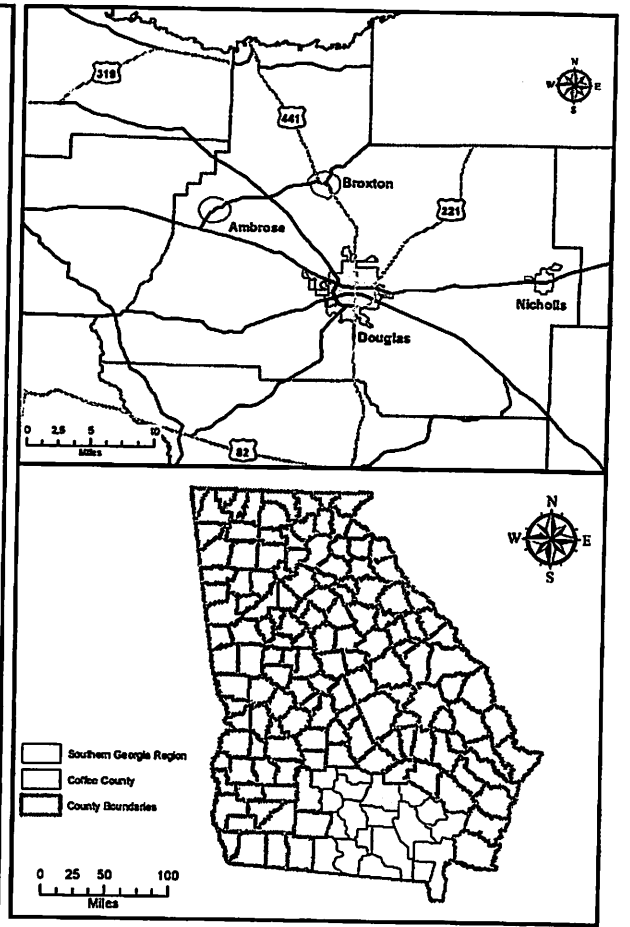
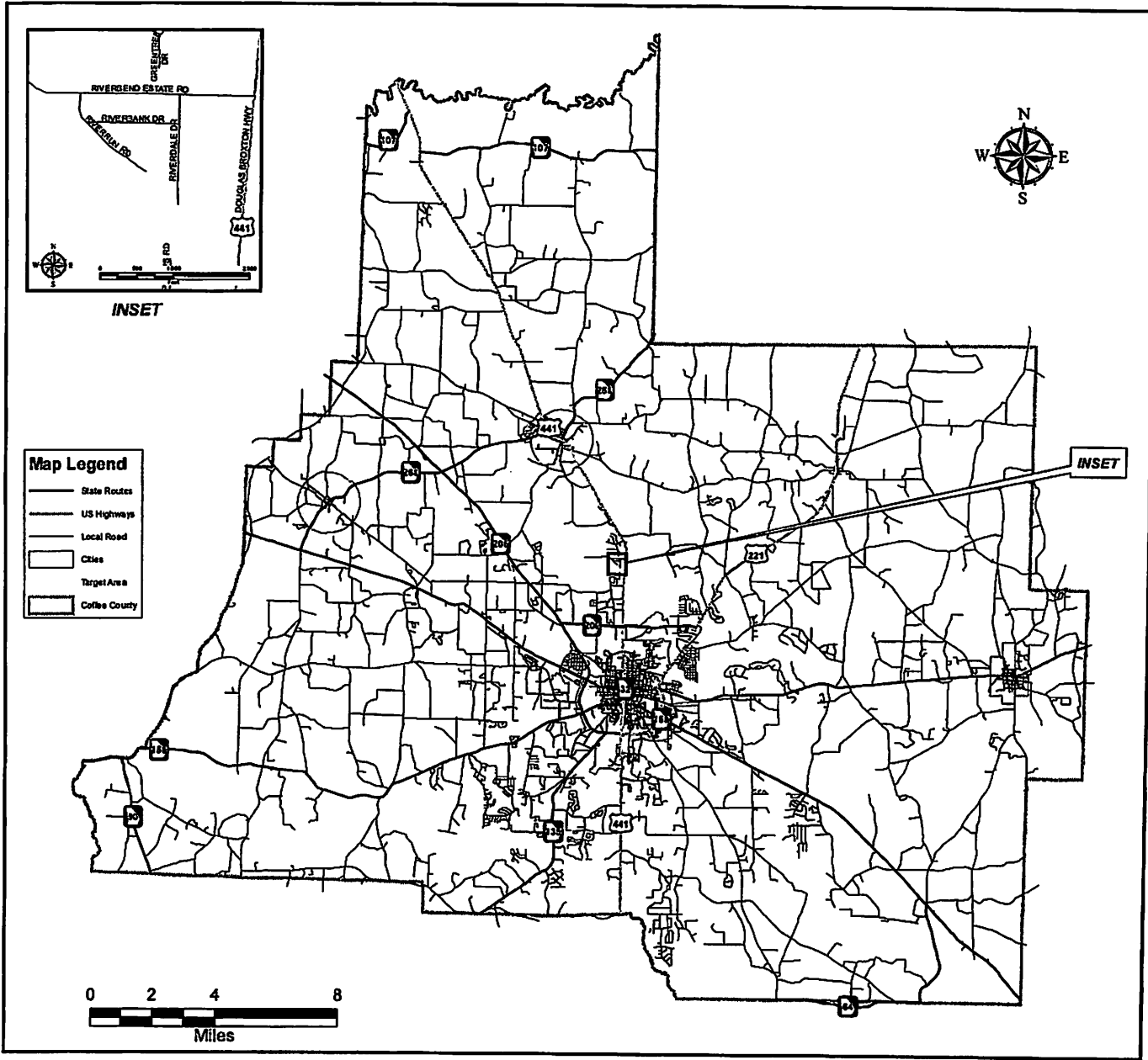
2020 ACS 5-Year Estimates Subject Tables
S1601 | LANGUAGE SPOKEN AT HOME
2020 ACS 5-Year Estimates Subject Tables

Notes Data Tables Surveys Census Maps Transpose Margin of Error Restore Excel CSV ZIP Print View

Coffee County, Georgia

Label	Total Estimate	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak E...	Speak English less than "very well"	Percent speak English less than "very well"
Total						
Population 5 years and over	40187	0%	58223	95.2%	1512	4.8%
Speak only English	35457	88.3%	0%	0%	0%	0%
Speak a language other than English	4082	10.1%	2766	67.8%	1014	25.0%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	3753	9.3%	2105	56.1%	1648	43.9%
5 to 17 years old	793	2.1%	614	77.3%	179	22.7%
18 to 64 years old	2604	6.5%	1208	46.4%	1396	53.6%
65 years old and over	167	0.4%	162	97.0%	5	2.9%
Other Indo-European languages	756	1.9%	545	72.1%	211	27.9%
5 to 17 years old	162	0.4%	142	87.7%	20	12.3%
18 to 64 years old	522	1.3%	390	74.7%	132	25.3%
65 years old and over	72	0.2%	15	20.8%	57	78.2%
Asian and Pacific Island languages	88	0.2%	66	75.0%	22	25.0%
5 to 17 years old	0	0.0%	0	0%	0	0%
18 to 64 years old	88	0.2%	60	68.2%	28	31.8%
65 years old and over	0	0.0%	0	0%	0	0%
Other languages	53	0.1%	50	94.3%	3	5.7%
5 to 17 years old	0	0.0%	0	0%	0	0%
18 to 64 years old	53	0.1%	50	94.3%	3	5.7%
65 years old and over	0	0.0%	0	0%	0	0%
017-2545 15 YEARS AND OVER						

Search
Columns
Filter
Print
View



Coffee County CDBG MIT 2017 Applicant Location Map 2

Map created February 2021 for general planning purposes only. Refer all questions on data accuracy and availability to the Southern Georgia Regional Commission.



S1601 | LANGUAGE SPOKEN AT HOME

2019, ACS 5-Year Estimates Subject Tables

Notes |
 1 Geo |
 Years |
 Topics |
 Surveys |
 123 Codes |
 Hide |
 Transpose |
 Margin of Error |
 Restore |
 Excel |
 Download |
 Print |
 Map

Coffee County, Georgia								
Label	Total		Percent of specified language speakers					
	Estimate	Percent	Speak English only or speak English "very well"			Speak English less than "very well"		Percent speak English less than...
			Estimate	Percent	Margin of Error	Estimate	Percent	Estimate
Population 5 years and over	40,084	(X)	38,173	±522	95.2%	1,911	4.8%	
Speak only English	35,209	87.8%	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	4,881	12.2%	2,970	±331	60.8%	1,911	39.2%	
SPEAK A LANGUAGE OTHER THAN ENGLISH								
Spanish	4,129	10.3%	2,516	±369	60.9%	1,613	39.1%	
5 to 17 years old	1,238	3.1%	769	±183	69.7%	469	38.3%	
18 to 64 years old	2,774	6.9%	1,635	±279	58.9%	1,139	41.1%	
65 years old and over	117	0.3%	92	±92	78.6%	25	21.4%	
Other Indo-European languages	616	1.5%	405	±226	65.7%	211	34.3%	
5 to 17 years old	155	0.4%	155	±94	100.0%	0	0.0%	
18 to 64 years old	337	0.8%	226	±147	67.1%	111	32.9%	
65 years old and over	124	0.3%	24	±37	19.4%	100	80.6%	
Asian and Pacific Island languages	37	0.1%	0	±28	0.0%	37	100.0%	
5 to 17 years old	0	0.0%	0	±28	-	0	-	
18 to 64 years old	37	0.1%	0	±28	0.0%	37	100.0%	
65 years old and over	0	0.0%	0	±28	-	0	-	
Other languages	99	0.2%	49	±36	49.5%	50	50.5%	
5 to 17 years old	0	0.0%	0	±28	-	0	-	
18 to 64 years old	99	0.2%	49	±36	49.5%	50	50.5%	
65 years old and over	0	0.0%	0	±28	-	0	-	
CITIZENS 18 YEARS AND OVER								
All citizens 18 years old and over	30,859	(X)	30,265	±268	98.4%	494	1.6%	
Speak only English	28,352	93.5%	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	2,007	6.5%	1,513	±311	75.4%	494	24.6%	
Spanish	1,629	5.3%	1,315	±292	80.7%	314	19.3%	
Other languages	378	1.2%	198	±102	52.4%	180	47.6%	