Georgia Department of Community Affairs

Language Access Plan

2016-2021

DCA Language Access Plan (LAP)

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Section 1: INTRODUCTION

Signed on August 11, 2000, Executive Order 13166 mandated that federal agencies must publish guidance on how persons whose primary language is not English and those who have a limited ability to speak, read, write, or understand English will be provided Meaningful Access to federally funded assistance programs. On the same date, the Department of Justice issued guidance in accordance with the Executive Order which clarified the Limited English Proficiency (LEP) requirements under Title VI of the Civil Rights Act of 1964. Pursuant to Executive Order 13166, each federal agency was mandated to provide guidance specifically tailored to its recipients consistent with the LEP Guidance issued by the Department of Justice to explain how the general standards established in the LEP Guidance will be applied to the agency's recipients. On September 15, 2016, the Office of General Counsel (OGC) issued Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency. In that Guidance, the OGC states that the Fair Housing Act prohibits housing providers from using LEP selectively based on a protected class or as a pretext for discrimination because of a protected class. The Act also prohibits housing providers from using LEP in a way that causes an unjustified discriminatory effect.

The Georgia Department of Community Affairs ("DCA" or "Agency") is a recipient of federal financial assistance and is therefore obligated to reduce language barriers that could preclude Meaningful Access by LEP persons to DCA programs that are funded with such federal financial assistance. DCA has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken to ensure Meaningful Access to Agency services, programs, and activities on the part of LEP persons. In preparing this Plan, DCA conducted a Four-Factor Analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Agency or its federally funded programs; (2) the frequency with which LEP persons come into contact with the Agency's programs; (3) the nature and importance of the programs, activities, or services to people's lives; and (4) resources available to execute the programs and the costs of providing the LEP services.

Section 2: BACKGROUND

DCA was created in 1977 to serve as an advocate for local governments. On July 1, 1996, the Governor and General Assembly merged the Georgia Housing and Finance Authority (GHFA) with DCA. Today, DCA operates a host of state and federal grant programs; serves as the state's lead agency in housing finance and development; promulgates building codes to be adopted by local governments; provides comprehensive planning, technical, and research assistance to local governments; and provides rental assistance for eligible households.

DCA administers all federally funded programs in compliance with federal statutes and regulations. Federally funded programs administered by DCA include, but are not limited to: Housing Choice Voucher (HCV) Program, Section 811, Community Development Block Grants (CDBG), HOME, Housing Opportunities for Persons with AIDS/HIV (HOPWA), Emergency Solutions Grants (ESG), and Neighborhood Stabilization Program (NSP).

Section 3: POLICY

It is the policy of DCA to comply with all federal statutes and regulations in the administration of federally funded programs. DCA will take timely and reasonable steps to provide LEP persons with Meaningful Access to programs and activities conducted by DCA. Access to DCA programs and services should not be impeded as a result of an individual's inability to speak, read, write or understand English. DCA will review and update its LEP Four-Factor Analysis at least every five years.

DCA will train staff, contractors, and Sub-recipient administrators (program administrators who are expected to conduct a Four-Factor Analysis and other efforts described within this LAP), and local government officials on procedures to implement and continuously monitor and evaluate the implementation of LAPs in the State of Georgia.

Pursuant to the requirements of Title VI, sub-recipients of federal funds received through an administration grant/award made by DCA are also required to make reasonable efforts to provide timely, Meaningful Access for LEP persons to programs and activities. In order to do so, Sub-recipients should first conduct an assessment to determine the need for language assistance within their service area. This is accomplished by conducting the Four-Factor Analysis, which is described in this Plan. After completion of the Four-Factor Analysis, the Sub-Recipient Type IIs will understand the languages spoken by LEP persons in their service area, and can determine how to provide needed language assistance.

Based upon the findings of the Four-Factor Analysis, and when deemed necessary, the Sub-Recipient Type IIs should prepare an LAP addressing the Sub-recipient's plan for ensuring Meaningful Access to programs and activities for LEP persons. A Sub-Recipient Type II may conclude that different language assistance measures are sufficient for the different types of programs or activities in which it engages. For instance, a Sub-Recipient Type II may determine that certain activities are more important and/or have greater impact on or contact with LEP persons, and thus such programs or activities require enhanced language assistance. Although DCA is providing Sub-Recipient Type IIs with a template from which to develop a LAP, Sub-Recipient Type IIs have flexibility in determining how to appropriately address the needs of the LEP populations they serve.

The Sub-Recipient Type II is also required to select an individual responsible for coordination of LEP compliance, train staff involved in programs and activities on LEP requirements, keep records of assistance provided and actions taken, and update the Four-Factor Analysis and LAP, as needed.

DCA will monitor all Sub-Recipients to ensure LEP individuals receive meaningful access to federally funded programs in accordance with the terms identified in Section 12 of this LAP.

Section 4: PURPOSE AND PLAN OVERVIEW

The purpose of this Plan is to analyze the location and needs of Georgia's LEP population through the Four-Factor Analysis of Census data. The Plan establishes guidelines in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English

Proficiency, 65 Fed. Reg. 50,121 (Aug. 16, 2000). The Plan will also describe how DCA and its Sub-recipients will provide Meaningful Access to programs, eliminate or reduce LEP as a barrier to receipt of services offered by DCA programs and activities, and provide substantially equal and meaningfully effective access to DCA programs and services.

DCA has outlined the reasonable steps to provide Meaningful Access to federally funded programs for LEP persons based on the classification of each federally funded program. Federally funded programs that DCA directly administers as a Direct Beneficiary (e.g., HCV program, Section 811, etc.) will provide written translations of vital documents in accordance with the results of DCA's Four-Factor Analysis.

DCA will monitor the reasonable steps taken to ensure LEP individuals have Meaningful Access to federally funded Sub-Recipient programs. Sub-recipient administrators (operating programs including Community Development Block Grants (CDBG), HOME, Housing Opportunities for Persons with AIDS/HIV (HOPWA), Emergency Solutions Grants (ESG), and Neighborhood Stabilization Program (NSP)), will be monitored based on their independent LAPs as directed by their independently conducted Four-Factor Analyses.

For Direct Sub-recipient programs (where DCA awards funds to organizations to conduct services (e.g. housing counseling agencies or housing developers)), DCA will monitor language access strategies and provide training and support language access activities.

Under this Plan, DCA and its Sub-recipients will provide two primary types of language access services: oral and written. Both oral language access services and written language access services will meet the standards for Meaningful Access as described in this Plan, including interpretation and translation services being conducted by a demonstrably qualified bilingual staff member communicating directly in an LEP person's language or a qualified contractor providing interpretation or translation services.

DCA will continually monitor compliance with this Plan and the effectiveness of the Plan in eliminating barriers to Meaningful Access for LEP individuals.

DCA and its Sub-recipients will engage in outreach efforts to ensure that LEP persons are aware of the language access services available to them.

DCA will also provide training to Program-level LAP Coordinators, Sub-recipient grant administrators, local government officials, and direct service staff on methods of assistance available to LEP individuals in the implementation of this Plan. This training will be periodically updated and delivered as DCA's LEP needs and language access services evolve.

Section 5: REGULATORY AND LEGAL AUTHORITY

A. Section 109 of the Housing & Community Development Act of 1974

Section 109 states that "no person in the United States shall, on the grounds of race, color, national origin, religion, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with Federal financial assistance."

B. Title VI of the Civil Rights Act of 1964 and Implementing Regulations

Title VI of the Civil Rights Act of 1964, Section 601, 42 USC 200d, provides that no person shall "on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. Section 602 authorizes and directs federal agencies that are empowered to extend federal financial assistance to any program or activity "to effectuate the provision of [Section 601]… by issuing rules, regulations, or orders of general applicability."

The regulations in Section 602 prohibit recipients from utilizing "criteria or methods of administration which have the effect of subjecting persons to discrimination based on their race, color or national origin, or have the effect of defeating or substantially impairing accomplishments of the objectives of the program or activity as respect to persons of a particular race, color or national origin." On January 22, 2007, the Department of Housing and Urban Development (HUD) published the final rule "Notice of Guidance to Federal Financial Assistance Recipients, regarding Title VI Prohibition against National Origin Discrimination – Affecting Limited English Proficient Person" (HUD LEP Guidance).

C. Title II of the Americans with Disabilities Act of 1990 and Implementing Regulations

Subtitle A of Title II of the Americans with Disabilities Act of 1990 protects qualified individuals with Disabilities on the basis of disability in the services, programs or activities of all state and local governments.

D. Section 504 of the Rehabilitation Act of 1973 and Implementing Regulations

Section 504 of the Rehabilitation Act of 1973 states that, "No otherwise qualified individual with a disability in the United States, as defined in section 705 (20) of this title, shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"

Section 6: DEFINITIONS

Beneficiary: The ultimate consumer of federally funded programs who receives benefits from a federally funded recipient.

Bilingual: A person who is bilingual is fluent in two languages and is able to conduct the business of the workplace in either of those languages. This is to be distinguished from proficiency in more

than one language. Interpretation and translation require the interpreter or translator to be fluently bilingual and also require additional specific skills for interpretation and translation.

Customer: Any individual or organization communicating with a DCA program.

DCA LAP Coordinator: DCA's 504 Coordinator.

Direct "In-Language" Communication: Monolingual communication in a language other than English between a multilingual staff and an LEP person (e.g., Korean to Korean).

Effective Communication: Communication sufficient to provide an LEP individual with substantially equivalent levels of service access received by non-LEP individuals. Staff must take reasonable steps to ensure communication with an LEP individual is as effective as communication with non-LEP individuals when providing similar programs and services.

External Stakeholder: A person who is not a DCA employee and who has contact with, or is seeking information or services from, DCA programs or activities. External stakeholders include, but are not limited to, members of the general public, renters, homeowners, and small business owners.

Federal Financial Assistance: Grants, loans, and advances of federal funds, the grant or donation of federal property and interests in property, or any other assistance as specified in 24 CFR Part I § 1.2(e).

Focus Languages: Languages, specifically Chinese, Korean, Spanish, and Vietnamese, identified through the Four-Factor Analysis as having a sufficient level of prevalence amongst LEP individuals in Georgia to warrant statewide efforts for written translations of vital documents.

Four-Factor Analysis: The analysis that Recipients of federal funding are required to use to determine what language assistance measures are sufficient to assist LEP persons in the different programs and activities in which the Recipient engages, as described in "Final Guidance to Federal Financial Assistant Recipients regarding Title VI Prohibition against National Origin Discrimination, affecting Limited English Proficient Persons" published in the Federal Register (January 22, 2007). The four factors include:
1.) The number or proportion of LEP persons eligible to be served or likely to be encountered in the service population ("served or encountered" includes those persons who would be served or encountered by the Recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
2.) The frequency with which LEP persons come into contact with the program;
3.) The nature and importance of the program, activity, or service provided by the program; and
4.) The resources available to execute the program and costs of providing the LEP services.

Fluent: A person who is able to express oneself easily and articulately in conversations and public speaking.

Interpretation: The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.

Language Access Plan (LAP): A written implementation plan that addresses identified needs of the LEP persons served.

Language Assistance Services: Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with Meaningful Access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by DCA.

Limited English Proficient (LEP) Individuals: Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English because of their national origin. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter. (HUD LEP Guidance). LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still demonstrate LEP for other purposes (e.g., reading or writing).

Meaningful Access: LEP individuals' accurate, timely, and effective participation in, or benefit from, federally funded programs that is meaningfully equivalent to that of non-LEP individuals, at no cost to the LEP individual.

Multilingual staff or employee: A staff person or employee who has demonstrated fluency in English and reading, writing, speaking, or understanding at least one other language as authorized by his or her Division.

Primary Language: An individual's primary language is the language in which an individual most effectively communicates.

Proficient: The ability of a person to speak, read, write, and understand a language. An individual who is proficient in a language may, for example, be able to greet an LEP individual in his or her language or facilitate access to translation services, but not conduct Agency business in that language.

Qualified Translator or Interpreter: An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate.

Recipient: Qualified applicants in compliance with 24 CFR §1.2(f) who are awarded federal financial assistance. The Voluntary Compliance Agreement defines Recipient as "the meaning specified at 24 CFR §1.2(0)." 24 CFR §1.2(f) defines Recipient as "any State, political subdivision of any State, or instrumentality of any State or political subdivision, any public or private agency, institution, organization, or other entity, or any individual, in any State, to whom Federal financial assistance is extended, directly or through another recipient, for any program or activity, or who otherwise participates in carrying out such program or activity (such as a redeveloper in the Urban Renewal Program), including any successor, assign, or transferee thereof, but such term does not include any ultimate beneficiary under any such program or activity."

Sight Translation: Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

Sub-recipient: Any public or private agency, institution, organization, or other entity to whom federal financial assistance is extended, through DCA for any program or activity, or who otherwise participates in carrying out such program or activity but such term does not include any Beneficiary under any such program.

Translation: The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

VCA: Voluntary Compliance Agreement

Vital Document: Any document that is critical for ensuring Meaningful Access to the Recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and any consequences the LEP person might face if the information in question is not provided accurately or in a timely manner. For instance, applications for auxiliary activities, such as certain recreational programs in public housing, would not generally be considered a vital document, whereas applications for housing would be considered vital. However, if the major purpose for funding the recipient were its recreational program, documents related to those programs would be considered vital. Where appropriate, recipients are encouraged to create a plan for consistently determining, over time and across its various activities, what documents are "vital" to the Meaningful Access of the LEP populations they serve.

Section 7: FOUR-FACTOR ANALYSIS

As described in HUD's 72 FR 2732, the starting point for ensuring Meaningful Access is to conduct an individualized assessment (Four-Factor Analysis) that takes into account the following four factors:

1. Number or proportion of LEP persons in the eligible service population,
2. Frequency with which LEP individuals come in contact with the programs,
3. Nature and importance of the service provided by the programs, and
4. Resources available to execute the programs and the costs of providing the LEP services.

Below is DCA's analysis across all 159 counties and 626 cities identified by the U.S. Census. DCA identified 46 counties and the 93 cities as being most impacted in regards to LEP access. Counties and cities considered most impacted are those in which at least one language for LEP individuals exceeded the thresholds discussed below.

Classifying Federally Funded Programs
To determine what reasonable steps DCA must take to provide Meaningful Access to federally funded programs for LEP persons, DCA first determined which of its programs were federally funded. DCA then characterized the federally funded programs accordingly:

(1) Direct Beneficiary – Programs administered by DCA
(2) Sub-Recipient Type I – DCA awards funds to organizations to conduct services (e.g. housing counseling agencies or housing developers)
(3) Sub-Recipient Type II – Awards to local governments, non-profits and other non-entitlement/sub-recipients who are expected to independently conduct a Four-Factor Analysis and other efforts described within this LAP.

The Four-Factor Analysis is applied to DCA's Direct Beneficiary programs for the purpose of identifying DCA's vital documents for written translation.

DCA will ensure language access is provided to LEP persons to ensure Meaningful Access to DCA's Sub-Recipient Type I and Sub-Recipient Type II programs accordingly:
- Sub-recipient Type I (e.g. developers or non-profits) are awarded federal funds from DCA to conduct services.
- For both DCA's Sub-recipient Types I and II, DCA will monitor whether its sub-recipients have taken reasonable steps to ensure Meaningful Access for LEP persons to Sub-recipient-operated, federally funded programs.
- DCA will serve as a resource to provide recommendations and technical guidance to Sub-recipient entities in their language access activities.
- DCA's strategy for monitoring Sub-Recipient Type II implementation of their own analyses is included in Section 10.

Table 1. Federally Funded DCA Programs and Services

Category	Federally Funded Programs
Direct Beneficiary	HomeSafe Georgia
Direct Beneficiary	Radon Education program
Direct Beneficiary	Section 8 Housing Choice Voucher Program (Rental Assistance)
Direct Beneficiary	Section 811 Project Rental Assistance Demonstration
Sub-Recipient Type I	Georgia Commission for Service and Volunteerism/AmeriCorps
Sub-Recipient Type I	HOME Multifamily Affordable Housing Development
Sub-Recipient Type I	HUD Housing Counseling Program
Sub-Recipient Type I	NFMC Foreclosure Counseling Program
Sub-Recipient Type I	National Housing Trust Fund
Sub-Recipient Type II	Appalachian Regional Commission
Sub-Recipient Type II	Continuum of Care Program
Sub-Recipient Type II	Emergency Solutions Grants (Homeless Program)
Sub-Recipient Type II	Housing Opportunities for Persons with AIDS (HOPWA)
Sub-Recipient Type II	Shelter Plus Care (S+C) Program
Sub-Recipient Type II	Community Development Block Grant
Sub-Recipient Type II	Community HOME Investment Program (CHIP)
Sub-Recipient Type II	Neighborhood Stabilization Program (NSP)

This Four-Factor Analysis thus determines what reasonable steps DCA must take to provide LEP individuals with Meaningful Access to those federally funded programs operated directly by DCA.

Factor 1: Number or Proportion of LEP Persons Served or Encountered in Eligible Service Population

To determine the number or proportion of LEP persons served or encountered in any service area in Georgia, DCA's analysis of Factor 1 uses a demographic examination of LEP persons in the State of Georgia.

DCA reviewed LEP data for all counties and Census-recognized cities in Georgia, identifying those that exceeded 5% of the area population (if greater than 50 individuals) or 1,000 individuals within a geographic area (both county and city in this case). Those counties and cities with a number of LEP language speakers exceeding these thresholds are listed in Table 5 and Table 6 in Appendix 4. All data used to estimate the proportion of LEP persons across Georgia's 159 counties and Census-recognized cities comes from the Census Bureau's American Community Survey (ACS) 5-year file (2010–2014) – Table "B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older."

For all counties in Georgia, including the 46 most impacted counties found in Table 5, no LEP population other than Spanish speakers exceeds 5% of the county's population. Six counties, however, have more than 1,000 individuals who speak a language other than Spanish and that do not speak English well. These counties are all found in the Atlanta region and all but one is a Participating Jurisdiction/Entitlement Area: Clayton, Cobb, DeKalb, Forsyth, Fulton, and Gwinnett. DCA identified 17 qualifying languages or language groups across these six counties, with African Languages (a Census grouping), Chinese, Korean, Spanish, and Vietnamese being the most prevalent. Upon further outreach, DCA has determined that the most prevalent African Languages in DeKalb County—the only county for which this grouping exceeds the threshold—are Somali, Amharic, Kinyarwanda, and Tigrinya.

For all cities in Georgia recognized by both Census and the State, including the 93 most impacted cities, only nine cities had LEP populations exceeding the safe harbor thresholds for a language besides Spanish. These cities are: Atlanta, Berkeley Lake, Clarkston, Duluth, Forest Park, John's Creek, Lake City, Lumpkin, and Morrow. All of these cities fall within the counties identified in the previous paragraph except Lumpkin, which is in Stewart County. DCA identified nine languages or language groups across these nine cities that met the above thresholds: African Languages (a Census grouping), Chinese, Hindi, Korean, Other Asian Languages (a Census grouping), Other Indic Languages (a Census grouping), Russian, Spanish, and Vietnamese. The only city in which a language grouping rather than individual languages met the threshold requirement was Clarkston. As such, DCA identified the need for further outreach and research to better understand the city's LEP population. Upon further outreach, DCA has determined that, in Clarkston, the most prevalent African Language is likely Amharic, there is not a clearly prevalent Other Indic Language, and the most prevalent Other Asian Language is likely Burmese. This is significant because a language group that meets the threshold may not contain any individual language that meets the threshold.

DCA observed that Chinese, Korean, Spanish, and Vietnamese are the only languages to exceed 1% of the total county population for LEP languages. While African Language speakers do exceed the 1% threshold in Gwinnett County, DCA determined upon further outreach and research that no individual language in this grouping would have exceeded this 1% threshold. These four languages are DCA's focus languages for the remainder of this analysis.

Table 2. DCA Focus Languages

Languages Exceeding 1% of the Total County Population
Chinese
Korean
Spanish
Vietnamese

In addition to these four focus languages, the city data would add African Languages, Hindi, Other Asian Languages, Other Indic Languages, and Russian to the focus list, but these groupings only exceed the safe harbor thresholds in a single city each—Berkeley Lake (population 1,694) for Russian; Clarkston (population 6,841) for African Languages, Other Asian Languages, and Other Indic Languages; and Lumpkin (population 1,131) for Hindi. Community outreach efforts in the city of Lumpkin support a conclusion that the size of the LEP population in Lumpkin was not accurately reflected in the Census data; and, in fact, the number of LEP persons in the city of Lumpkin was well below the acceptable threshold. Rather than add these languages as focus languages for the entire state, DCA will provide targeted translation and outreach in each area, which is further described in Section 11 of this LAP.

Table 3. Targeted Outreach Areas: Languages Exceeding Safe Harbor Thresholds in a Single City

City	Language Exceeding Threshold
Berkeley Lake (population 1,694)	Russian
Clarkston (population 6,841)	African Languages, Other Asian Languages and Other Indic Languages

While the affirmative efforts of this LAP will be on the focus languages identified above, DCA seeks and takes steps to provide access to services necessary for direct communication in any language. DCA has compiled data on the focus languages listed above at the county, city, and census tract level into an interactive online map available to Sub-recipients and the public. The instructions included in Attachment 1 visually illustrate this information with shading to represent the relative cumulative percentage of LEP individuals in each tract. This LAP mapping tool allows DCA and Sub-recipients to analyze where the greatest numbers of LEP individuals by language are located in each county by census tract and can aid in the completion of each Sub-recipient's own analysis.

DCA will update this data every five years in accordance with the overall update of the LAP policy, utilizing the same data source and methodology outlined in Appendix 4.

To help analyze Factors 2, 3, and 4, DCA disseminated a survey to all DCA Program Points of Contact (POCs). This survey utilized the Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance at https://www.lep.gov/selfassesstool.htm. For each program, this survey asked POCs to discuss the program's frequency of contact with both the general public and LEP individuals, the importance of the program, and what vital documents were necessary to ensure an individual's Meaningful Access to the program. The results for this survey for directly DCA-operated, federally funded programs are discussed below.

Factor 2: Frequency with which LEP Individuals Come into Contact with the Programs

All programs stated through the survey whether they directly assisted members of the public as well as the frequency with which members of the general public accessed their programs. DCA thus assumes that the frequency with which LEP persons access these programs in relation to that of all individuals is proportional to the number of LEP persons in the State of Georgia, as discussed in Factor 1. Only those programs which directly serve Beneficiaries in the general public—and thus LEP individuals—will be the focus for the subsequent steps of DCA's Four-Factor Analysis.

Table 4. Federally Funded, Direct Beneficiary Programs' Frequency of Public Contact

Program Name	Direct Client Assistance?	Frequency of Public Contact
HomeSafe Georgia	Yes	Daily
Radon Education program	Yes	Weekly
Section 8 Housing Choice Voucher Program	Yes	Daily
Section 811 Project Rental Assistance Demonstration	Yes	Daily

LEP individuals will receive direct language assistance commensurate with the frequency with which these individuals interact with the programs. For example, homeowners and renters who apply for various DCA programs are likely to have frequent contact with the program and should therefore have Meaningful Access to those programs. This may include such interactions as completing applications, award notices, and public comment notices. For program activities such as these, DCA's strategy—which is laid out in this Plan—will seek to ensure that these populations have Meaningful Access throughout the process.

Factor 3: Nature and Importance of the Program, Activity, or Service Provided by Programs

The nature and importance of the programs, activities, or services provided by the programs to LEP individuals is informed by conclusions from the analysis in Factor 2, program participation requirements, and program managers' responses as to whether a delay in service provision would significantly, negatively impact the wellness of an individual.

While DCA will provide outreach regarding services available to LEP individuals across all Agency programs, DCA will prioritize vital document translation and subsequent LEP outreach based on

importance of the activity, information, service, or program or possible consequences of a lack of service to the LEP persons.

LEP outreach will focus on the programs that provide critical services to program recipients, including but not limited to: homeowners, landlords, renters, and small business owners. Those programs that provide a means of helping individuals obtain or rehabilitate housing or supporting businesses are critically important to LEP individuals. For DCA, these programs are identified below.

Table 5. Determining Programs' Critical Importance to LEP Individuals

Program	Nature of Program	Freq. of Public Contact	Application necessary for participation?	Delay in service provision sig., neg. impact individual?
Section 8 Housing Choice Voucher Program	A tenant-based rental assistance program that assists extremely low and low-income individuals and families rent safe, decent, and affordable dwelling units in the private rental market.	Daily	Yes	Yes
Section 811 Project Rental Assistance Demonstration	DCA uses the HUD 811 Project Rental Assistance grant to increase the number of housing units available to individuals with a disability who are extremely low-income and between the ages of 18-61.	Daily	Yes	Yes
HomeSafe Georgia	This government mortgage assistance program offers three types of no-interest, forgivable loans for Georgia homeowners: mortgage payment assistance, mortgage reinstatement assistance, and mortgage payment reduction. Underwater Georgia joins this program as a limited-time program that allows homeowners to receive a one-time payment of up to $50,000 to reduce the home's principal balance.	Daily	Yes	Yes
Radon Education Program	A statewide education program to help homeowners and builders reduce airborne radon levels.	Weekly	No	No

Factor 4: Resources Available to DCA and Costs of Providing LEP Services

DCA takes all reasonable steps to ensure Meaningful Access for LEP persons to DCA programs and activities. The availability of resources, however, may limit the provision of language services in some instances. "Reasonable steps" may cease to be reasonable when the costs imposed substantially exceed the benefits. DCA's LAP balances the needs of the LEP community with the funding resources available.

DCA has identified those vital documents for each DCA-operated, federally funded program that directly faces LEP individuals and for which a delay in service provision might significantly, negatively impact the wellness of any individual that program serves. DCA has prioritized those

documents for which either the following statements are true, according to direct program contacts: 1) Without this document, an individual could not access the program; 2) This document allows access to a major activity within the program. In addition to any vital documents, DCA will also disseminate federally provided fair housing documents and brochures to clients, whenever applicable.

The table below lists these vital documents by program, as well as the languages into which the documents will be translated. As the coverage area of each program listed below includes counties in which more than 1,000 LEP individuals live who speak Spanish, Chinese, Korean and/or Vietnamese, all vital documents must be translated into these four focus languages. This table also lists the timetable for translation as the number of days following HUD's approval of this Plan.

Table 6. Identification of Vital Documents and Translation Strategy

Program	Vital documents	Language(s) into which document(s) will be translated	Timetable
Section 8 Housing Choice Voucher Program (Rental Assistance)	Pre-Application	Spanish, Chinese, Korean, Vietnamese	90 days
	Application	Spanish, Chinese, Korean, Vietnamese	90 days
	Lead Warning Statement (Contract Attachment)	Spanish, Chinese, Korean, Vietnamese	180 days
	Federally provided vital documents: • "Protect Your Family from Lead in Your Home" • "A Good Place to Live" booklet • "Fair Housing: Equal Opportunity for All" • HUD 52641-A Tenancy Addendum • Housing Assistance Payment Contract • Voucher • Request for Tenancy Approval • HUD- 52675 Debts Owed to Public Housing Agencies and Termination	All federal documents, with the exception of "Protect Your Family from Lead in Your Home" and HUD-52675 Debts Owed, are already translated into Chinese, Spanish, Vietnamese, and Korean. Under the Lead Disclosure Rule, sellers and landlords must "give an EPA-approved information pamphlet on identifying and controlling lead-based paint hazards ('Protect Your Family from Lead in your Home,' currently available in Spanish, Vietnamese, Russian, Arabic and Somali)." DCA will request EPA assistance in translating this information pamphlet. DCA will also work with HUD to locate additional translations of form HUD-52675.	180 days
Section 811 Project Rental Assistance Demonstration	HUD 811 Tenant Information Booklet	Spanish, Chinese, Korean, Vietnamese	180 days
	HUD 811 Property Inventory	Spanish, Chinese, Korean, Vietnamese	180 days
	Tenant Eligibility Criteria	Spanish, Chinese, Korean, Vietnamese	180 days
	HUD Income Charts	Spanish, Chinese, Korean, Vietnamese	180 days
	HUD 811 Wait List Referral Form & Authorization to Release Information	Spanish, Chinese, Korean, Vietnamese	120 days
HomeSafe Georgia	Application	Chinese, Korean, Vietnamese; Document currently exists in Spanish	90 days

Activities aimed at ensuring Meaningful Access to the LEP population will be incorporated and funded across all of the DCA programs outlined in DCA's Action Plans as well as the new programs outlined in the VCA.

At this time, each program area will independently fund language access services from its own allocated funding. If resources limit the provision of services already laid out in this document, DCA will keep record of both the service requested and financial reasoning for the limitation.

Section 8: STAFF TRAINING ON LEP NEEDS AND LAP

DCA has undertaken or will undertake the following tasks in order to ensure Meaningful Access to federally funded services, programs, and activities to LEP individuals. These tasks are predominantly focused on addressing the needs of LEP individuals accessing DCA-administered housing assistance and other programs.

<u>Naming Staff as Resources</u>

DCA's compliance with the LAP will entail the appointment of an LAP Coordinator as well as one primary and one secondary point of contact (POC) per Division (and program as necessary). General staff will also be invited to list their language proficiencies in a Language Bank, maintained and updated by the LAP Coordinator.

Appointment of LAP Coordinator

DCA has designated the 504 Coordinator position to serve as the LAP Coordinator and be the primary point of contact responsible for the implementation of the LAP across all federally funded programs. These language assistance programs include, but are not limited to: provision of language assistance services, training programs, outreach activities, support for programs translating vital documents, maintenance of the language bank described below, and review of data collected on individuals needing LEP assistance. The DCA LAP Coordinator's contact information is listed below:

Christy Barnes
DCA 504 Coordinator
fairhousing@dca.ga.gov
404-679-5291

Sub-Recipient Point of Contact

All Sub-recipients will be required to identify a Program Level LAP Coordinator responsible for securing language access services as applicable for their federally funded program(s). Each Sub-recipient is responsible for sending the name and contact information of each Sub-recipient's LAP Coordinator to DCA as part of its Grant Contract.

Division Points of Contact

Each Division at DCA will have a primary and secondary POC who has received additional training to support the LAP Coordinator. The Division POC will support the DCA LAP Coordinator in responding to language access questions related to that specific program. This individual is responsible for collecting data on LEP requests and contacts and forwarding this information to the LAP Coordinator as requested. The Division POC also assists their Agency staff with all language access issues. If the need for language access services is identified by phone, email, mail correspondence, or in person, staff are instructed to immediately contact their Division POC. The Division POC in turn takes appropriate action to ensure meaningful communication through the methods described in this LAP, with support from the DCA LAP Coordinator.

If, for any reason, the Division POCs are not available for a particular program, center or agency, program staff should contact the DCA LAP Coordinator at the telephone/email listed above. The DCA LAP Coordinator is also available as a resource in identifying personnel for providing LEP services.

DCA will maintain a list of primary and secondary POCs by Division (and specific programs as needed), which will be available to all staff. This list is available in Appendix 1.

Development of a Language Bank

DCA and all Sub-recipients identify staff who are professionally proficient or fluent in a language other than English. The DCA LAP Coordinator maintains a roster of DCA staff, along with their contact name, Division, office location, language proficiency (using language proficiency levels used by the US Department of State: https://careers.state.gov/gateway/lang_prof_def.html) for each self-identified language, work schedule, telephone number, and email address. Human resource staff and DCA management will create a form reflecting this listed information that all new DCA employees will complete through their onboarding process. The DCA LAP Coordinator will continue to coordinate with the appropriate human resource staff and DCA management to ensure the Language Bank is up-to-date and reflects the most recent staffing changes for all DCA employees who are bilingual or professionally proficient in a language besides English. The DCA LAP Coordinator disseminates this list to all programs having direct contact with the public and is responsible for verifying and revising it as needed, depending on changes in staff and demand for LEP services. DCA's current Language Bank is included in Appendix 3. The Language Bank will be used to facilitate the provision of interpreter services in all locations that have regular interactions with the public.

All staff professionally proficient in a language besides English receive training in providing language assistance support. Bilingual staff members wishing to serve as translators or interpreters may receive additional training in translation or interpretation. Those staff members are assessed and receive regular training on the following:

- Role and responsibility of a Language Bank Interpreter;
- Interpretation ethics;
- Specialized terminology; and
- Program specific information as needed.

If there are significant populations in areas where no staff fluent in the language is available, the Program Level LAP Coordinator for that location/program works with the DCA LAP Coordinator to identify locally available interpretation services. DCA will provide guidance to individuals identified in the language bank to insure the appropriate level of interaction with LEP individuals. DCA recognizes that the use of the language bank does not supplant the need for certified translation services but augments the availability of immediate LEP services.

Training Staff as Resources

Mandatory training on LEP awareness and current protocols will be developed for all staff. This training will be conducted on-line and in-person with the option for teleconference participation for

staff in the field. The goal of this mandatory training will be to provide an overview of the state and federal regulations regarding language access and explain DCA language access procedures.

DCA will develop two mandatory training courses for LAP and LEP issues: Basic LEP/LAP and Advanced LEP/LAP. DCA staff who do not frequently come into contact with the public will receive only the Basic LEP/LAP training online. DCA staff who frequently interact with the public as well as Division and program POCs will receive Advanced LEP/LAP training. The LAP Coordinator will track and maintain a list of required training and training schedules.

(i)   The Basic LEP/LAP Training will cover an overview of the definition of LEP persons, overview of the state and federal regulations governing language access, roles and responsibilities of DCA staff, DCA language access procedures, and the LAP complaints/appeals process.

(ii)   The Advanced LEP/LAP Training will cover an overview of the definition of LEP persons, overview of state and federal regulations governing language access, basic customer service skills and telephone etiquette, cultural sensitivity, roles and responsibilities of DCA staff, how to identify the language needs of an LEP individual, use of the "I Speak" card, DCA language access procedures, how to track the use of language services, and the LAP complaints/appeals process.

In addition to creating the LEP/LAP courses, DCA will also develop and deliver training specifically for the individuals in DCA's Language Bank. Language Bank training will cover an overview of the role and responsibility of Language Bank Interpreters and translation and interpretation ethics.

DCA will also incorporate LEP awareness and LAP protocol modules in new hire orientation offerings for all new DCA staff, including the online Basic LEP/LAP Training. Staff will be informed of upcoming trainings with the exact date, time and location of training. All trainings will be overseen by the DCA LAP Coordinator. Upon completion of the training, the trainer will provide a list of the staff in attendance to the DCA LAP Coordinator. Staff completing basic training online will certify that they completed the training.

Each DCA program should assess the extent to which non-English language proficiency is necessary to fulfill the program's mission. DCA values the multilingual skills of its employees. Multilingual employees with frequent interaction with LEP individuals or whose work plan includes the provision of language assistance services will be identified by their manager and undergo language assessments in oral and written proficiency coordinated by the LAP Coordinator. All Divisions should take reasonable steps to develop quality control procedures to ensure that DCA employees who communicate or correspond in a non-English language with LEP individuals do so in an accurate and competent manner. Managers are also encouraged to take into account the amount of time an employee has spent providing language assistance services when assessing employee goals and performance.

Section 9: LANGUAGE ASSISTANCE MEASURES

Provision of Language Access Services

All programs with direct contact with the public are responsible for providing written or oral language services. "I Speak" cards are used by all staff who may have direct interaction with LEP individuals to identify language needs and begin the provision of access services. The "I Speak" card used by DCA is included in Appendix 2.

Plan for Providing Interpreters and Spoken Translation

For oral encounters, program staff have access to three contracted translation service providers that can interpret program information into the applicant's native language:

- Interpreters Unlimited (In person only – 800-726-9891)
- Language Line Services (Telephonic or recording – 800-752-6096)
- LATN, Inc. (In-person or telephonic – 800-943-5286)

The program applicant will identify him/herself as an LEP individual. By way of this designation, public-facing program staff are instructed to call a toll-free number and assist applicants with the help of the telephone operator and interpreters available through this service.

For all focus languages, a state-contracted entity provides written translation services on demand for DCA and its Sub-recipient partners. The contact information of the approved contractor is provided to all Sub-recipient agencies and updated as needed. DCA will partner with organizations to develop additional translating resources for written materials and maintain a list of such organizations available to all Divisions.

Plan for Providing Language Access Services to Meeting Participants and Attendees

DCA and Sub-recipients will leverage the contracted translation services and bilingual staff to provide interpretation services as needed for all meetings related to program eligibility determinations. DCA is committed to providing interpreters for large, medium, small, and one-on-one DCA meetings with any LEP individuals or organizational representatives as needed and as appropriate.

DCA will include a statement in its meeting notices indicating that 1) DCA is prepared to provide appropriate language services for LEP individuals and 2) requesting that the respondent identify any language services needed within a specified period of time, including which language(s) such services are required.

DCA's ability to provide an in-person interpreter upon request is limited by available resources and the scheduling availability of the translation service(s). DCA will provide interpretation services in a meeting in the following manner:
- If the meeting is small (less than 10 people), telephone interpreter services will be provided.

- If the meeting is medium (11-20 people) or large (21 or more people), an in-person interpreter will be provided upon request.

When the meeting is off-site and/or open to the public, DCA will include the sentence, "Translation of the notice and interpretation services for this event are available upon request" in both Spanish and English in communication about the meeting.

Plan for Translating Informational Materials Detailing Provided Services and Activities

DCA will ensure that all important documents—whether "vital" or relating to public engagement—are translated into the relevant languages.

Translation of Vital Documents

Those programs identified in step three of the Four-Factor Analysis (in which LEP individuals may directly interact with DCA programs or staff) are prioritized in the translation of vital documents, identified in step four. Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. The determination of what documents are considered "vital" is left to the discretion of individual Divisions and programs at DCA, which are in the best position to evaluate their circumstances and services within their language access planning materials. While guided by HUD's definition of "vital" documents, each Division and program exercises its discretion in creating a process for identifying and prioritizing vital documents or texts to translate. Divisions and programs also ensure that all translations are completed by qualified translators.

Documents that may be considered "vital" may include, but are not limited to:
- Administrative release or waiver forms;
- Application forms;
- Public outreach or educational materials (including web-based material);
- Forms or written material related to individual rights; and
- Any other document for which either the following statements are true, according to direct program contacts: 1) Without this document, an individual could not access the program; 2) This document allows access to a major activity within the program.

Translation of all written materials requesting input and participation from the public is addressed in the following section.

Under most circumstances, materials primarily directed to developers, local governments, non-profits, lenders, or other professionals will not be considered "vital" for these purposes. Recognizing that preparing translations can be a resource- and time-intensive process, Divisions and programs are encouraged to seek stakeholder input in determining which documents should be prioritized for translation. Divisions and programs are also encouraged to pursue resource-sharing and cost-saving initiatives across DCA when translating documents. Ultimately, DCA will assess the considerations in this Plan, including the Four-Factor Analysis, and make decisions

within agency discretion and consistent with component language access plans as to how to provide Meaningful Access to written texts.

Translation of Notices, Public Hearings, and Citizen Participation Periods

All written materials requesting input and participation from the public for any HUD-funded activity will be translated into Spanish. These documents will also be made available in the other three focus languages upon request. This includes materials distributed during Citizen Participation periods when Substantial Action Plan Amendments are being considered. A "language disclaimer" in the three remaining focus languages, where applicable, will be included at the bottom of all printed materials intended for public outreach.

Notices of public hearings will be translated into Spanish and made available in the other three focus languages upon request. Notices of public hearings will also indicate that interpreters in any one of the four focus languages can be made available upon request to attend the public hearings to provide interpretation services to attendees. This includes public hearings about HUD-funded programs as well as public hearings regarding Substantial Action Plan Amendments.

DCA will monitor Sub-recipients' compliance of this task through its monitoring of all Sub-recipient responsibilities under Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, 65 Fed. Reg. 50,121 (Aug. 16, 2000).

Section 10: SUB-RECIPIENT OVERSIGHT AND MONITORING

The programs identified in Table 7 below represent the federally funded programs for which DCA awards or sub-grants funds to Sub-recipients. The following sections lay out the oversight and monitoring for those Sub-recipient delineated as Sub-Recipient Type IIs of DCA programs, such as a local government participating in the CDBG program. For programs delineated as working through a Sub-Recipient Type I, such as a housing developer or housing counseling agency, DCA will include specific requirements for Sub-recipient outreach and Meaningful Access measure in the program-level policies for those programs.

Table 7. Federally Funded DCA Sub-recipient Programs and Services

Category	Federally Funded Programs
Sub-Recipient Type I	Georgia Commission for Service and Volunteerism/AmeriCorps
Sub-Recipient Type I	HOME Multifamily Affordable Housing Development
Sub-Recipient Type I	HUD Housing Counseling Program
Sub-Recipient Type I	NFMC Foreclosure Counseling Program
Sub-Recipient Type I	National Housing Trust Fund
Sub-Recipient Type II	Appalachian Regional Commission
Sub-Recipient Type II	Continuum of Care Program
Sub-Recipient Type II	Emergency Solutions Grant (Homeless Program)
Sub-Recipient Type II	Housing Opportunities for People with AIDS (HOPWA)
Sub-Recipient Type II	Shelter Plus Care (S+C) Program
Sub-Recipient Type II	Community Development Block Grant
Sub-Recipient Type II	Community HOME Investment Program (CHIP)
Sub-Recipient Type II	Neighborhood Stabilization Program (NSP)

<u>Guidance and Technical Assistance for Sub-Recipient Type IIs</u>

DCA will develop guidance and technical assistance, including webinar training, in providing language access services for Sub-recipient grant administrators. This training will cover components of a meaningful LAP, LAP file review, LAP reporting requirements, and the LAP complaints/appeals process.

Sub-Recipient Type II Language Access Plans

DCA will provide a sample LAP for Sub-Recipient Type IIs of federally funded programs.

Sub-Recipient Type II Notice

DCA staff will provide information about language assistance planning requirements to Sub-Recipient Type IIs in all phases of the grant process including:

- Notices of funding availability (NOFAs)
- Grant application webinars and workshops
- Grant contracts
- Post award training
- Grant close out monitoring

Sub-Recipient Type II Training

DCA staff will provide Language Access Plan training to Sub-Recipient Type IIs as part of the pre-application and post award webinars and workshops. Training topics will include:

- General information about Language Access Plans
- How to perform the four factor analysis
- How to provide Meaningful Access to programs and activities
- Technical assistance for translation and interpretation services
- How to maintain records for close out monitoring

Sub-Recipient Type II Technical Assistance

DCA staff will provide ongoing technical assistance to Sub-recipients to ensure compliance with the LAP requirements. Technical assistance will include informational webinars posted to the DCA website about LAP requirements, review of Sub-recipients plans and Four-Factor Analyses to determine if they meet HUD standards, and access to resources for translation and interpretation services.

<u>Sub-Recipient Type II Monitoring</u>

DCA will monitor Sub-Recipient Type IIs to ensure that they have completed policies in line with the sample LAP and related guidance materials and are taking reasonable steps to provide Meaningful Access to LEP persons.

DCA intends to meet its responsibilities to ensure Sub-Recipient Type II compliance with Title VI and the Title VI regulations through the process of Sub-Recipient Type II monitoring, provision of technical assistance, and referral of complaints to HUD for further investigation. DCA will include as part of a regular Sub-Recipient Type II project monitoring, an evaluation of a Sub-Recipient Type II's compliance with LEP requirements.

This will include the following:
1) Determining whether the Sub-Recipient Type II has identified a LEP contact person;
2) Determining whether the Sub-Recipient Type II completed a Four-Factor Analysis;
3) Determining whether the Sub-Recipient Type II has a LAP;
4) Determining whether and how LEP persons are being provided Meaningful Access to programs and activities; and
5) Whether the Sub-Recipient Type II is maintaining records regarding their efforts to comply with Title VI LEP obligations.

DCA will inform a Sub-Recipient Type II of any findings of compliance or noncompliance in writing. DCA will attempt to resolve the findings by informal means such as seeking corrective action. If DCA determines that compliance cannot be secured by voluntary means, DCA may require repayment of Sub-Recipient Type II funding received, refer the matter to HUD, or use any other appropriate enforcement mechanism.

Section 11: LEP OUTREACH

Outreach and Notice to LEP Individuals

DCA shall maintain notices on its website of the availability of translation and interpretation services. DCA regional staff will also provide information relating to DCA's translation and interpretative services to industry partners. Staff who use email messaging services to keep participants informed of available resources will add a link to DCA's website which will contain information related to the availability of interpretative services offered by DCA and will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. DCA will monitor, maintain, and update LEP requirements as required by HUD at least annually and/or as changes occur. The LEP plan will be provided to any person or agency requesting a copy.

DCA is in the process of updating the Agency website. As part of this update, DCA will provide a clear, targeted link for LEP individuals to access the DCA fair housing page, where translated notices, program descriptions, fair housing brochures, and Vital Documents will be available.

Georgia Housing Search

DCA continues to sponsor a web-based, housing database that provides detailed information about available rental properties and units and helps people find housing to best fit their needs. The service can be accessed at no cost online 24 hours a day or through a toll-free, bilingual call center at 1-877-428-8844, available M-F, 9:00 am - 8:00 pm EDT. The information contained on

the site is available through 103 languages, including those referenced in this plan. The current database is available through http://www.georgiahousingsearch.org. At this time, the site lists more than 200,000 properties throughout Georgia.

The fast, easy-to-use free search lets people look for rental housing using a wide variety of criteria and special mapping features. Housing listings display detailed information about each unit. The service also provides links to housing resources and helpful tools for renters such as an affordability calculator, rental checklist, and information about renter rights and responsibilities.

<u>Complaints and Appeals</u>

Any person who believes they have been denied the benefits of this LAP or that DCA 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 DCA LAP Coordinator. The Division or program POC 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:

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

<u>Additional Outreach</u>

Additional Outreach for Partnerships in LEP Communities

DCA will leverage existing relationships with community organizations including faith-based service groups, community associations, and service nonprofits to notify LEP individuals of DCA's language access services. Potential partners include, but are not limited to, Latin American Associations, Community Development Centers and Regional Commissions. The LAP Coordinator will maintain this list of partners. DCA also anticipates that community partnerships will be shared with Sub-recipients and Local Governments to coordinate language access services in their jurisdictions/areas.

Additional Outreach in Cities Exceeding Threshold for Written Translations

For the two cities that exceed the threshold for written document translation, Berkeley Lake, and Clarkston, DCA will undertake targeted outreach to ensure access for LEP individuals in those areas. DCA will pursue agreements, such as a memorandum of understanding (MOU), with local service providers and other organizations that can assist in marketing DCA programs and facilitate in providing language access services. DCA will provide outreach materials translated into prevalent languages in each area and will work with the local partners to identify any need for further translation of written documents or other forms of translation that can achieve an equal level of language access. As the population groups in these areas are small compared to the entire state, DCA believes that this more focused approach will provide better, more reasonable language access.

Section 12: MONITORING, EVALUATING AND UPDATING THE LAP

For our language access program to continue to be effective, DCA will periodically monitor, evaluate, and update the plan, policies and procedures. The DCA LAP Coordinator will be responsible for monitoring, evaluating, and updating the LAP. On an annual basis the LAP will be updated to reflect any change in the plan based on the prior year's activity, as needed. DCA will annually review the U.S. Census Bureau's American Community Survey (ACS) to assess the population of Limited English Proficient residents within the state of Georgia and update the LAP, as necessary. DCA will continue to conduct the Four-Factor Analysis every five years. As part of this monitoring and evaluation effort, DCA will review procedures for providing language access services, existing training programs, outreach activities, the Language Bank, and the language access data to periodically update the language access program. The DCA LAP Coordinator is responsible for evaluating, and updating the language access plan, as well as coordinating monitoring for CDBG, the 811 program, Continuum of Care Program (including Shelter Plus Care), HOPWA and ESG programs. This LAP is a living document that, through monitoring and evaluation, may be updated as the needs of the LEP population and the demands on DCA to service this population evolve.

DCA will have in place processes to regularly identify and assess what the LAP is providing to our current customers as well as potential customers and how we can better meet their needs. Monitoring and evaluating the LAP will include:
- Tracking and assessing DCA's interactions with LEP individuals
- Soliciting feedback from community-based organizations about the effectiveness and performance in ensuring Meaningful Access to our LEP customers.
- Maintaining current community demographics and needs by engaging with local resources who can assist with demographic changes.
- Monitoring DCA's response rate to complaints and/or suggestions offered by LEP individuals and employees regarding the language assistance services provided.
- Considering new resources, including funding, collaborations with other agencies, human resources, emerging technologies and other mechanisms for ensuring improved access for LEP individuals.
- Reviewing and evaluating the translation invoices from the language services to determine if translation requests are made for languages other than Spanish, Chinese, Korean or Vietnamese, numbering more than 5% of the eligible population.
- Tracking categorized language interpretations requested of staff interpreters.
- Maintaining digital folders, organized by language for all vital documents in SharePoint.

Creating a record of language assistance services can help inform programs whether there should be changes to the quantity or type of language assistance services. The monitoring and review of current policies and the types of language assistance services provided should occur on an annual basis.

Sub-Recipients will be required to comply with LEP obligations as a condition of award. DCA will monitor all sub-recipients for LEP compliance, including:

1. Sub-Recipient Acknowledgement Statement

Sub-Recipients will be required to acknowledge LAP obligations at application as a condition of award. Applicants for federal funds through DCA must include an executed statement acknowledging their LAP obligations with their applications. This statement must include the applicant's agreement to provide a LAP to DCA within sixty (60) days of notification of award and agreement to provide evidence of compliance with the locally adopted LAP to DCA during on-site and file review monitoring activities. Applicants who fail to execute and submit a LAP acknowledgement may be deemed ineligible for the award.

2. Submission of a Language Access Plan (LAP)

Sub-Recipients I will be required to comply with DCA's LAP. Sub-Recipients II will be required to submit a locally adopted LAP, including the four-factor analysis conducted for the project/program area.

DCA will provide this LAP to all Sub-Recipients I and monitor compliance with the LAP in accordance with regularly scheduled performance monitoring. Any Sub-Recipient I found to be out of compliance with DCA's LAP, will be provided immediate instructions to cure the non-compliance. If the Sub-Recipient I does not cure the non-compliance or continues to have repeated instances of non-compliance, DCA may impose a range of penalties, including, but not limited to, required additional LAP training to the Sub-Recipient I and discontinuance of current or future work with the Sub-Recipient I.

The Sub-Recipient II's LAP must include:

- The name of the individual responsible for coordination of LEP compliance;
- LEP training plan for all staff involved in programs and activities on LEP requirements;
- Languages identified from the Four-Factor Analysis;
- Schedule for translating and disseminating vital documents;
- Policy for Updating the Four-Factor Analysis and the LAP.

DCA program staff will monitor Sub-Recipients II for compliance with the submitted LAP during monitoring events performed in association with the award. DCA program staff will document findings in the monitoring file and report any non-compliance to the DCA VCA Coordinator.

Sub-Recipients who have documented non-compliance with the LAP will be provided a plan to remedy the non-compliance or to reduce the likelihood of future recurrence of non-compliance. Any Sub-Recipient II who remains in non-compliance by violating the compliance agreement may incur a range of penalties, including, but not limited to, required, additional LAP training and ineligibility for continued or future funding.

APPENDICES

Appendix 1: LAP Program Contacts

Division/Program	LAP Point of Contact	Office Number	Office Email	Secondary LAP Point of Contact	Office Number	Office Email
Housing Finance and Development	Samanta Carvalho	404-679-0567	Samanta.Carvalho@dca.ga.gov	December Thompson	(404) 327-6830	december.thompson@dca.ga.gov
Community Development	Linda Thompson	404-679-1584	linda.thompson@dca.ga.gov	Brian Johnson	(404) 679-3105	brian.johnson@dca.ga.gov
Finance Division	Christine Antaya	404-679-4846	christine.antaya@dca.ga.gov	Michael Richardson	(404) 679-0574	michael.richardson@dca.ga.gov
Administration	Jared Hill	404-679-4839	jared.hill@dca.ga.gov	Robert Rego	404-679-5266	robert.rego@dca.ga.gov
Homeownership Division-Homeownership Finance	Tracey Turman	404-679-4847	tracey.turman@dca.ga.gov	Jamilla Byrd	404-327-6858	jamilla.byrd@dca.ga.gov
Homeownership Division-HomeSafe Georgia	Brenda McGee	770-806-2088	brenda.mcgee@dca.ga.gov	Diane Hester	770-806-7024	diane.hester@dca.ga.gov
Housing Assistance Division-Athens	Krista Mitchell	770-414-3211	krista.mitchell@dca.ga.gov	Patricia Tacuri	706 369-5698	Patricia.tacuri@dca.ga.gov
Housing Assistance Division-Eastman	Krista Mitchell	770-414-3211	krista.mitchell@dca.ga.gov	Donna Culverhouse	478 867-3057	donna.culverhouse@dca.ga.gov
Housing Assistance Division-Tucker	Krista Mitchell	770-414-3211	krista.mitchell@dca.ga.gov	Ella Gee	770 414 -3248	ella.gee@dca.ga.gov
Housing Assistance Division-Waycross	Krista Mitchell	770-414-3211	krista.mitchell@dca.ga.gov	Stacy Griffin	912 285-6211	stacy.griffin@dca.ga.gov
Community Services	John VanBrunt	706-825-1356	john.vanbrunt@dca.ga.gov	Beth Eavenson	404-387-6977	beth.eavenson@dca.ga.gov
Executive	Grant Cagle	404-327-6846	grant.cagle@dca.ga.gov	Alyssa Justice	404-679-3154	alyssa.justice@dca.ga.gov
Community Finance Division	Pam Truitt	404-679-5240	pam.truitt@dca.ga.gov	Dana Mykytyn	404-679-0629	dana.mykytyn@dca.ga.gov
Housing Assistance Division-Atlanta	Krista Mitchell	770-414-3211	krista.mitchell@dca.ga.gov	Theresa Renfroe	404-327-6815	theresa.renfroe@dca.ga.gov

Appendix 2: "I Speak" Card

Europe

#	Language		
70	**Albanian**	Shqip	
	Tregoni me gisht gjuhën që flitni.		
	Do të gjejmë një përkthyes për ju.		
72	**Armenian**	Հայերէն	
	Տուք ստաք որ ձեր լեզուն եք խոսիր		
	որպիսի թարգմանիչ մը կանչել ստաք.		
136	**Basque**	Euzkera	
	Zeure izkuntza atzamarragaz erakutzi.		
	Euzkeratzail bateri deituko deutsagu.		
69	**Bulgarian**	Български език	
	Посочете Вашия език.		
	Ние ще извикаме преводач за Вас.		
132	**Catalan**	Català	
	Assenyali amb el dit el seu idioma.		
	Es trucarà a un intèrpret.		
67	**Croatian**	Hrvatski	
	Molim Vas, pokažite nam Vaš jezik.		
	Zvat ćemo tumača za Vas.		
63	**Czech**	Čcsky	
	Ukažte, který je váš jazyk.		
	Zavoláme tlumočníka.		
55	**Danish**	Dansk	
	Peg på dit sprog.		
	En tolk vil blive tilkaldt.		
56	**Dutch**	Nederlands	
	Wijs uw taal aan.		
	Wij zullen u een tolk geven.		
77	**Estonian**	Eesti Keel	
	Näidake oma emakeelele.		
	Me muretseme teile tõlgi.		
52	**Finnish**	Suomi	
	Osoittakaa teidän kielenne.		
	Tulkki kutsutaan auttamaan teitä.		
58	**French**	Français	
	Montrez-nous quelle langue vous parlez.		
	Nous vous fournirons un/e interprète.		
57	**German**	Deutsch	
	Zeigen Sie auf Ihre Sprache.		
	Wir rufen einen Dolmetscher an.		
71	**Greek**	Ελληνικά	
	Δείξτε ποιά γλώσσα μιλάτε και		
	θα κληθεί ένας διερμηνέας.		
65	**Hungarian**	Magyar	
	Válassza ki az ön által beszélt nyelvet.		
	Kapcsoljuk a tolmácsot.		

#	Language		
133	**Icelandic**	Íslenska	
	Bentu á þitt tungumál.		
	Það verður hringt í túlk.		
59	**Italian**	Italiano	
	Faccia vedere qual è la sua lingua.		
	Un interprete sarà chiamato.		
75	**Lithuanian**	Lietuvių Kalba	
	Parodyk tavo kalbamą kalbą.		
	Vertėjas bus pakviestas.		
68	**Macedonian**	Makedonski	
	Posočete molim Vaš jezik.		
	Ke vikame prevodilac Vas da doide.		
54	**Norwegian**	Norsk	
	Pek på ditt språk.		
	En tolk vil bli tilkalt.		
62	**Polish**	Polski	
	Proszę wskazać na swój język ojczysty.		
	Tłumacz zostanie poproszony do telefonu.		
61	**Portuguese**	Português	
	Aponte seu idioma.		
	Providenciaremos um intérprete.		
66	**Romanian**	Românește	
	Indicați limba pe care o vorbiți.		
	Veți fi pus in legătură cu un interpret.		
78	**Russian**	Русский Язык	
	Укажите, на каком языке Вы говорите.		
	Сейчас Вам вызовут переводчика.		
148	**Serbian**	Српски	
	Молим Вас, покажите нам Ваш језик.		
	Зваћемо тумача за Вас.		
64	**Slovak**	Slovensky	
	Ukážte na vašu reč.		
	Zavoláme tlmočníka.		
60	**Spanish**	Español	
	Señale su idioma.		
	Se llamará a un intérprete.		
53	**Swedish**	Svenska	
	Peka ut Ert språk.		
	En tolk kommer att tillkallas.		
76	**Ukrainian**	Українська Мова	
	Покажіть, якою мовою ви говорите.		
	Зараз викличуть вам перекладача.		
135	**Yiddish**	ייִדיש	
	ווײַזט אָן אויף אײַער שפּראַך.		
	מע וועט אײַנקלינגען אַן איבערזעצער.		

Pacific Islands

#	Language		
120	**Aklan**	Aklanon	
	Ituro mo ro atong hambae.		
	Magtawag kami et mag-interprete.		
127	**Fijian**	Kaiviti	
	Dusia na nomu vosa.		
	Ena qai kacivi edua mi vakavaka dewa.		
113	**Ilocano**	Ilokano	
	Itudom iti saom.		
	Umayab kam iti interprete.		
50	**Indonesian**	Bahasa Indonesia	
	Tunjukkan bahasamu.		
	Jurubahasa akan disediakan.		
51	**Malay**	Bahasa Malaysia	
	Tunjukkan yang mana bahasa anda.		
	Seorang jurubahasa akan diberitahu.		
126	**Samoan**	Gagana Samoa	
	Tusi lou 'a'ao i lau gagana.		
	O le a vala'auina se tasi e fa'amatala 'upu mo 'oe.		
117	**Tagalog**	Tagalog	
	Pakituro mo nga ang iyong wika.		
	Magpapatawag ako ng interprete.		
128	**Tongan**	Tonga	
	Tuhu kihe lea 'oku ke lea 'aki.		
	'E fetu'utaki kihe fakatonulea.		

North America, South America, and Caribbean

#	Language		
58	**French**	Français	
	Montrez-nous quelle langue vous parlez.		
	Nous vous fournirons un/e interprète.		
129	**Haitian Creole**	Kreyòl Ayisyen	
	Montre lang ou-a.		
	Yap voye chèche yon entèprèt.		
144	**Navajo**	Diné	
	Saad béé honisinígíí níla' bee bik'idiiłnííh.		
	Ata' halneé la' nábich'į' hodoonih.		
61	**Portuguese**	Português	
	Aponte seu idioma.		
	Providenciaremos um intérprete.		
60	**Spanish**	Español	
	Señale su idioma.		
	Se llamará a un intérprete.		

Language Line services

Language Identification Card

As a Language Line Services customer you have access to over-the-phone interpretation 24 hours a day, 7 days a week. Use this Language Identification Card in a face-to-face situation, to determine which language a person speaks. The Language ID Card lists the languages most frequently encountered in North America, grouped by the geographical region where they are commonly spoken.

- To use the Language ID Card efficiently, locate the geographical region where you believe the non-English speaker may be from. (Pacific Islands, Europe, etc.)
- Show the person the languages listed for that region. The message underneath each language says: "Point to your language. An Interpreter will be called."

Sample:

00	**English**	English	
	Point to your language.		
	An Interpreter will be called.		

- Refer to your Quick Reference Guide (QRG) to access an interpreter through Language Line Services. In most cases, an interpreter is available within seconds.
- If you are unable to identify the language, our representative will help you.

Please note: Listing of languages within this card does not guarantee availability of interpreters in these languages. Language Line Services interprets from English into more than 140 languages, only the most requested languages are listed here. This list is subject to change based upon demand.

©LLS 2001 • For more information about our service, from North America call 1 800 752-6096, option 1. Language Line Services, One Lower Ragsdale Drive, Monterey, CA 93940

India, Pakistan, and Southwest Asia

84 **Bengali** — বাংলা
আপনি কোন ভাষায় কথা বলেন - জানান ।
আপনার সেবার জন্য একজন অনুবাদক আসবেন ।

85 **Bhojpuri** — भोजपुरी
रौआके मातृभाषा का बा ?
रौआलेत एगो दुभाषिया बोलादेल जाईत ।

83 **Gujarati** — ગુજરાતી
તમારી ભાષા ઈશારાથી બતાવો.
તમારા માટે આપનારે દુભાષી બોલાવી અપાશે.

82 **Hindi** — हिन्दी
अपनी भाषा इशारे से दिखाइये ।
आपके लिए दुभाषिया बुलाया जाएगा !

88 **Malayalam** — മലയാളം
നിങ്ങൾ ഏതു ഭാഷയിലാണ് സംസാരിക്കുന്നതെന്ന് കാണിച്ചു തരൂ. നിങ്ങൾക്കുവേണ്ടി ഒരു ദ്വിഭാഷിയെ വരുത്തുന്നതാണ്.

81 **Nepali** — नेपाली
आफ्नो भाषा चिनाउनु होस् ।
तपाईंको भाषा बोल्ने व्यक्ति बोलाइने छ ।

80 **Punjabi** — ਪੰਜਾਬੀ
ਆਪਣੀ ਬੋਲੀ ਇਸ਼ਾਰੇ ਨਾਲ ਦੱਸੋ ।
ਤੁਹਾਡੇ ਵਾਸਤੇ ਪੰਜਾਬੀ ਬੋਲਣ ਵਾਲਾ ਦੁਭਾਸ਼ੀਆ ਮੰਗਵਾਇਆ ਜਾਵੇਗਾ ।

89 **Sinhalese** — සිංහල
ඔබ කතා කරන්නේ කුමන භාෂාවෙන්දැයි පෙන්වන්න.
ඔබ වෙනුවෙන් පරිවර්තකයකු ගෙන්වනු ලැබේ.

137 **Tamil** — ஆங்கிலம்
நீங்கள் பேசுகிற மொழியைச் சுட்டிக்காட்டுங்கள். உங்களுக்கு உதவியாக ஒரு மொழிபெயர்ப்பாளர் வரவழைக்கப்படுவார்.

79 **Urdu** — اردو
آپ کون سی زبان میں بات کرنا پسند کرینگی؟
آپ کی مدد کیلئے ابھی کی ترجمان کو بلایا جائے گا ۔

Africa

27 **Amharic** — አማርኛ
በምን ቋንቋ እንደሚናገሩ ያመልክቱ።
እኛትamየሚተረጉሙልዎ ያዘጋጃሉ።

90 **Arabic** — اللغة العربية
أشر الى لغتك
وسننادي المترجم حالاً.

19 **Bambara** — Bamanankan
I bolo da i fakan kan.
An benna kuma yelemabaga do wele.

58 **French** — Français
Montrez-nous quelle langue vous parlez.
Nous vous fournirons un/e interprète.

22 **Hausa** — Hausa
Nuna yarenkà/yàrenki.
A à kirà tafintà.

59 **Italian** — Italiano
Faccia vedere qual è la sua lingua.
Un interprete sarà chiamato.

61 **Portuguese** — Português
Aponte seu idioma.
Providenciaremos um intérprete.

141 **Portuguese Creole** — Cabo Verdiano
Ponta pa bu lingua.
Un intrepeto ta ser chumado.

142 **Somali** — Afsomali
Tilmaan afka aad ku hadasho.
Tarjumaan ayaa la wacaayaaye.

26 **Swahili** — Kiswahili
Onyesha lugha yako.
Tutamwita mtu atakayekufasiria.

28 **Tigrinya** — ትግርኛ
ናይ ብትግርኛ ትዛረብ እንተኾንካ/ኪ አመልክት። ኣስተርጓሚ ክንጽውዓልካ/ኪ ኢና።

20 **Wolof** — Wolof
Wan ñu sa làkk.
Negal dinañu la wutal ab tekkikat.

21 **Yoruba** — Yorùbá
Tọ́ka sí èdè rẹ.
À ó pe ògbifọ̀ wá.

Middle East

90 **Arabic** — اللغة العربية
أشر الى لغتك
وسننادي المترجم حالاً.

72 **Armenian** — Հայերեն
Ցույց տուեք որ լեզւով էք խոսում եւ յարմար թարգմանիչ մը կանչել տամք։

139 **Assyrian** — ܐܬܘܪܝܐ
ܚܘܝ ܠܘ ܠܫܢܘܟ
ܘܒܚܕ ܥܕܢܐ ܩܪܝܢ ܠܡܬܪܓܡܢܐ

111 **Dari** — دری
شما بكدام زبان گپ ميزنيد؟
بيگ ترجمان ميآيد.

107 **Farsi** — فارسی
زبانی که صحبت میکنید نشان دهید.
برای شما مترجم میآوریم.

106 **Hebrew** — עברית
הצבע על השפה שלך
נקרא למתרגם מיד.

140 **Kurdish** — کوردی
زمانی خۆت دەستنیشان بکه
تەرجومانێکت بۆ بانگ دەکەینە سەرتەلەفۆن

110 **Pashto** — پښتو
خپله ژبه وښينه.
ژر به ترجمان در سره خبري وکړي.

112 **Turkish** — Türkçe
Kendi anadilinizi gösterin.
Size bir tercüman çağırıyoruz.

Asia

China	請指認您的語言 以便為您請翻譯	请指认您的语言 以便为您请翻译	
31 **Cantonese**	廣東話	广东话	
38 **Chaochow**	潮州話	潮州话	
32 **Fukienese**	福建話	福建话	
35 **Mandarin**	國語	国语	
37 **Shanghai**	上海話	上海话	
33 **Taiwanese**	台灣話	台湾话	
36 **Toishanese**	台山話	台山话	

Asia

42 **Burmese** — မြန်မာစကား
မည်သည့်ဘာသာစကားဖြင့် ပြောဆိုကြောင်းညွှန်ပြပါ။ သင့်အတွက် စကားပြန်တစ်ဦးကို ခေါ်ယူပေးပါမည်။

18 **Cambodian** — កម្ពុជា
សូមបង្ហាញភាសា
ដើម្បីយើងខ្ញុំរកអ្នកបកប្រែភាសាឲ្យ

46 **Hmong** — Hmoob
Thov taw tes rau koj yam lus.
Peb yuav hu ib tug neeg txhais lus rau koj.

50 **Indonesian** — Bahasa Indonesia
Tunjukkan bahasamu.
Jurubahasa akan disediakan.

40 **Japanese** — 日本語
あなたの話す言葉を指さしてください。
通訳を呼びます。

41 **Korean** — 한국말
당신이 쓰는 말을 지적하세요.
통역관을 불러 드리겠어요.

43 **Laotian** — ລາວ
ຊີ້ບອກພາສາທີ່ທ່ານເວົ້າໃຫ້ແດ່
ພວກເຮົາຈະຫາຄົນແປພາສາມາໃຫ້ທ່ານ

51 **Malay** — Bahasa Malaysia
Tunjukkan yang mana bahasa anda.
Seorang jurubahasa akan diberitahu.

45 **Mien** — Mienh
Nuqv meih nyei waac mbuox yie liuz,
yie heuc faan waac mienh bun meih oc.

47 **Thai** — ไทย
ช่วยชี้ให้ดูภาษาของคุณด้วยเพื่อเราจะได้หาคนมาแปลภาษาให้ แก่ประสานงานให้ท่านโดยเร็ว

49 **Vietnamese** — Tiếng Việt
Chỉ rõ tiếng bạn nói.
Sẽ có một thông dịch viên nói chuyện với bạn ngay.

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Appendix 3: Current Language Bank

Staff Member	Division	Location	Translation Training Date	Interpreter Training Date	Language 1	Reading (1-5)	Speaking (1-5)	Language 2	Reading (1-5)	Speaking (1-5)	Language 3	Reading (1-5)	Speaking (1-5)	Office Hours (*Flex Day)	Office Number
Samanta Carvalho	Housing Finance and Development	DCA Central Office			Spanish	3	2	Portuguese	3	2				8:00-5:00 M-F	404-679-0567
Patricia Tacuri	Housing Assistance Div.	Athens			Spanish	4	5							8:00-5:00 M-F	706-369-5698
Doris Suero	Homeownership Div-HomeSafe Georgia	Norcross			Spanish	5	5	French	2	2				8:00-4:30 M-F	770-806-2082
Amber Keller	Planning and Environmental Management	DCA Central Office			Spanish	2	2							8:30-5:30 M-F	404-679-4946
Beth Eavenson	Community Services	Region 5			Spanish	3	2							7:00-5:00 M-F*	404-387-6977
Nathan Christiansen	Homeownership Div-Homeownership Finance	DCA Central Office			Spanish	2	2							7:30-4:30 M-F	404-679-3126
Fenice Taylor	Homeownership Div-Homeownership Finance	DCA Central Office			Chinese	5	5							8:30-5:30 M-F	404-679-0647
Grace Baranowski	Housing Finance and Development	DCA Central Office			Spanish	3	3							8:00-5:30 M-F*	
Eldhose Baby	Administration	DCA Central Office			Malayalam	5	5	Hindi	3	1	Tamil	1	3	7:00-4:30 M*-F	404-679-4906
Mathew P John	Administration	DCA Central Office			Malayalam	5	5	Hindi	5	4	Tamil	4	4	7.0 -4.30 M-F*	404-679-4901
Regina Sandoval	Administration	DCA Central Office			Spanish	5	5							8:00-5:00 M-F	404-679-0570
Alex Galdona	Administration	DCA Central Office			Spanish	5	5							8:00- 5:00 M-F	404-327-6873
Setareh Ordoobadi					Farsi	5	5							8:00-5:00 M-F	404-679-3104
Jimish Patel	Housing Finance and Development	DCA Central Office			Gujarati	5	5	Hindi	4	4				8:00-5:00 M-F*	678-891-4900
Anna Hensley	Community Finance Division	DCA Central Office			Spanish	4	3							8:00-5:00 M-F	404-679-4912

Appendix 4: LEP FOUR-FACTOR ANALYSIS

Factor 1: Number or Proportion of LEP Persons in Eligible Service Population

DCA reviewed from the United States Census Bureau's American Community Survey (ACS) 5-year estimates (2010–2014) – Table "B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older" by county and Census-recognized cities in Georgia. This allowed DCA to see the language proficiency in Georgia for all counties and cities, based on the 38 languages or language groups identified by the U.S. Census Bureau. DCA then applied the HUD safe harbor threshold requirements for written translation (the lesser of 5% when more than 50 persons or 1,000 persons speaking a specified language) to determine the primary languages of the LEP populations. Using the HUD safe harbor threshold, DCA identified those areas that exceeded the safe harbor thresholds of the area population (if greater than 50 individuals) or 1,000 individuals within a geographic area (both county and city in this case). Of the 38 languages or language groups identified by the U.S. Census Bureau, DCA identified 46 counties and 93 cities as containing LEP populations exceeding the HUD safe harbor threshold requirements.

Of the 46 counties identified above, only six counties have more than 1,000 individuals who speak a language other than Spanish and that do not speak English well. These counties were all found in Entitlement Areas in the Atlanta region: Clayton, Cobb, DeKalb, Forsyth, Fulton, and Gwinnett. DCA identified 17 qualifying languages or language groups across these six counties, with African Languages (a Census grouping), Chinese, Korean, Spanish, and Vietnamese being the most prevalent. Of the 93 cities, only nine cities had LEP populations exceeding the safe harbor thresholds for a language besides Spanish. These cities are: Atlanta, Berkeley Lake, Clarkston, Duluth, Forest Park, John's Creek, Lake City, Lumpkin, and Morrow. All of these cities fall within the counties previously identified except Lumpkin, which is in Stewart County. DCA identified nine languages or language groups across these nine cities that met the above thresholds: African Languages (a Census grouping), Chinese, Hindi, Korean, Other Asian Languages (a Census grouping), Other Indic Languages (a Census grouping), Russian, Spanish, and Vietnamese.

In order to identify focus languages among the 17 languages that met the 1,000-person threshold in the highly populated counties in the Atlanta region, DCA followed the process identified in the New Jersey LAP and identified LEP populations exceeding a 1% threshold. DCA observed that African Languages, Chinese, Korean, Spanish, and Vietnamese are the only languages to exceed 1% of the total county population for LEP languages. Upon further outreach, DCA has determined that the most prevalent African Languages in DeKalb County—the only county for which this grouping exceeded the threshold—are Somali, Amharic, Kinyarwanda, and Tigrinya. However, over 64 African languages were identified as being spoken, with none exceeding 1% (6,551 individuals) of the DeKalb population. With 7,233 individual speaking African Languages in DeKalb, one language would need to exceed 90% of all African language speakers to meet this 1% threshold.

The only cities in which a language or language grouping aside from Spanish, Korean, Vietnamese, and Chinese met the threshold requirement are Berkeley Lake, Clarkston, and Lumpkin. Upon further outreach to Clarkston Community Center and Friends of Refugees, DCA

has determined that no single language from the African Language, Other Indic language, or Other Asian language census groupings in Clarkston exceeds the threshold for the four-factor analysis. Through outreach to the Clarkston Community Center and Friends of Refugees, DCA has determined that the following African Languages are spoken in Clarkston: Somali, Arabic, Amharic, Dari and Pashto, with Somali being the most prevalent. Additionally, there is not a clearly prevalent Other Indic language, and the most prevalent Other Asian language is likely Burmese. Based on outreach and analysis of census data, DCA reached the conclusion that none of these prevalent languages exceeded the HUD safe harbor threshold.

Additionally, DCA's community outreach efforts in the city of Lumpkin support a conclusion that the size of the LEP population in Lumpkin was not accurately reflected in the Census data; and, in fact, the number of LEP persons in the city of Lumpkin was well below the acceptable threshold.

While the LEP individuals in Berkeley Lake and Clarkston merit language access services, DCA believes that a more targeted outreach effort is the more reasonable and effective route for providing access. Accordingly, DCA will not include these languages or groupings in the list of focus languages but will provide specific LEP data to any Sub-recipient of funds in Berkeley Lake and Clarkston. DCA also intends to continue cultivating relationships with local partner organization through whom DCA can most effectively and efficiently disseminate outreach regarding DCA programs and translations services.

Table 8: Language Spoken at Home by Ability to Speak English by County

This table shows all counties with at least one language that meets a threshold of at least 1,000 people or 1% of the county population (at least 50 people) for written translations and all languages that exceeded those thresholds in at least one county.

	Total	Speak only English	Spanish	Chinese	Korean	Vietnamese
Atkinson County	7,595	5,973	774	-	-	-
Barrow County	65,706	57,966	2,404	20	29	33
Bartow County	94,113	86,877	2,764	-	65	-
Bibb County	143,891	136,764	1,752	139	143	66
Carroll County	104,350	96,757	2,627	9	222	53
Chatham County	256,327	234,662	5,798	807	227	557
Cherokee County	207,090	182,966	8,093	364	20	242
Clarke County	112,669	97,025	5,586	667	262	147
Clayton County	242,665	193,379	14,534	407	206	5,170
Cobb County	660,920	525,711	33,354	1,843	1,397	1,752
Coffee County	39,988	36,105	1,429	143	14	-
Colquitt County	42,255	35,119	4,008	-	-	-
Columbia County	123,726	111,797	1,744	615	626	253
Coweta County	122,609	111,625	3,621	77	174	142
DeKalb County	655,145	532,072	31,663	3,262	1,697	2,570
Douglas County	125,681	110,729	3,456	187	35	232
Echols County	9,953	2,830	557	-	-	-

Evans County	10,048	8,797	547	11	-	-	
Fayette County	103,271	91,142	2,083	310	222	213	
Floyd County	89,964	80,995	3,714	27	25	170	
Forsyth County	176,351	144,228	6,433	859	1,188	409	
Fulton County	903,305	753,464	29,283	4,628	3,697	1,212	
Gilmer County	26,868	24,479	1,272	79	-	-	
Glynn County	75,770	68,561	2,574	111	13	231	
Gordon County	51,869	43,905	4,138	18	16	75	
Grady County	23,446	21,127	1,295	-	-	5	
Gwinnett County	780,613	521,370	65,812	6,732	12,429	9,435	
Habersham County	40,778	35,064	2,296	-	-	8	
Hall County	171,743	125,405	20,974	273	64	828	
Henry County	195,907	176,985	2,741	319	39	428	
Houston County	135,316	123,540	2,949	-	81	491	
Jackson County	56,755	52,215	1,569	-	7	13	
Liberty County	57,614	51,103	1,159	19	129	64	
Lowndes County	104,189	97,842	1,508	155	159	21	
Murray County	36,857	32,009	2,066	22	-	-	
Muscogee County	183,438	165,973	4,268	92	659	98	
Newton County	94,332	87,922	1,742	98	39	101	
Paulding County	135,261	126,623	1,717	-	-	40	
Polk County	38,284	33,017	2,193	-	-	50	
Richmond County	186,549	175,748	1,460	119	257	85	
Rockdale County	80,742	71,442	4,008	-	58	175	
Telfair County	15,648	13,522	1,465	11	-	-	
Tift County	38,151	33,797	1,196	-	10	138	
Toombs County	25,101	22,710	1,313	68	-	-	
Walton County	79,961	75,088	1,201	8	33	-	
Whitfield County	95,474	66,272	14,595	54	10	167	

Table 9: Language Spoken at Home by Ability to Speak English by City

This table shows all cities with at least one language that meets the threshold for written translations and all languages that exceeded those thresholds in at least one city.

	Total:	Speak only English	Spanish	Russian	Hindi	Chinese	Korean	Vietnamese
Acworth city	19,778	15,125	1,310	-	-	14	42	58
Alpharetta city	56,150	41,024	1,265	430	357	438	447	83
Alto town	1,046	531	284	-	-	-	-	-
Ambrose city	438	323	56	-	-	-	-	-
Athens-Clarke County unified gov't	111,599	96,024	5,558	7	38	664	262	147

Atlanta city	412,665	368,033	8,236	137	117	1,414	873	181
Augusta-Richmond County consolidated gov't	182,246	171,649	1,420	56	-	119	257	85
Austell city	6,481	5,261	382	-	-	-	20	-
Baldwin city	3,050	2,056	509	-	-	-	-	8
Baxley city	4,182	3,616	285	-	-	-	-	-
Berkeley Lake	1,694	1,243	10	104	21	40	17	16
Blue Ridge city	1,347	1,180	77	-	-	-	-	-
Bogart town	1,121	914	81	-	-	-	-	-
Brookhaven city	45,613	29,530	7,730	249	-	159	513	-
Broxton city	1,024	920	54	-	-	-	-	-
Brunswick city	14,463	12,589	1,068	-	-	2	-	-
Buena Vista city	2,220	1,877	302	-	-	-	-	-
Buford city	11,664	7,469	2,000	36	-	-	-	-
Calhoun city	14,530	9,629	2,524	-	50	-	-	-
Cairo city	9,025	7,759	675	-	-	-	-	-
Canton city	21,862	16,548	2,853	9	-	71	-	35
Carrollton city	23,431	19,978	1,384	-	-	9	9	53
Cedartown city	8,893	5,739	1,820	-	10	-	-	-
Chamblee city	14,587	7,564	4,543	-	-	144	23	197
Chatsworth city	4,097	3,009	481	-	-	-	-	-
Clarkston city	6,841	2,788	56	-	-	19	-	244
Claxton city	1,938	1,656	157	-	-	11	-	-
Clayton city	1,797	1,540	189	-	-	-	-	-
Columbus city	183,438	165,973	4,268	-	70	92	659	98
Commerce city	5,821	5,245	318	-	-	-	-	-
Conyers city	14,224	11,854	1,251	-	-	-	-	-
Cornelia city	3,928	2,727	658	-	-	-	-	-
Cumming city	5,273	3,713	715	-	-	-	-	-
Dacula city	4,410	2,803	496	-	-	-	-	-
Dahlonega city	5,675	4,945	448	-	-	8	19	-
Dalton city	30,503	16,312	7,644	-	-	49	10	64
Dillard city	319	219	56	-	-	-	-	-
Doraville city	9,345	3,304	3,093	-	36	252	75	193
Duluth city	25,785	16,796	1,048	63	54	899	1,958	251
Dunwoody city	43,854	33,069	1,556	108	143	289	292	193
East Ellijay city	876	673	75	-	-	-	-	-
East Point city	32,408	27,443	1,577	-	-	140	33	32
Eatonton city	6,148	5,151	534	-	-	-	-	-
Ellijay city	1,473	1,121	257	-	-	-	-	-
Emerson city	1,284	1,033	130	-	-	-	-	-
Enigma town	945	750	121	-	-	-	-	-
Eton city	817	529	100	-	-	-	-	-
Fairburn city	12,362	10,405	622	-	-	-	-	63
Forest Park city	17,346	10,589	2,818	-	8	18	8	929

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Funston city	646	543	55	-	-	-	-	-
Gainesville city	31,446	17,987	6,637	-	-	212	10	528
Greensboro city	3,074	2,607	193	-	-	-	-	-
Grovetown city	11,099	8,989	926	-	-	-	10	-
Hapeville city	6,100	4,129	804	-	-	-	-	65
Jacksonville city	162	85	77	-	-	-	-	-
Johns Creek city	75,870	51,806	1,323	274	403	2,034	1,894	278
Kennesaw city	29,101	22,985	1,373	16	51	40	81	131
Lake City	2,442	1,881	157	-	-	8	-	159
Lawrenceville	27,102	17,548	2,416	109	13	8	53	401
Lilburn city	11,281	6,568	1,065	40	106	241	43	186
Lovejoy city	5,876	4,759	326	-	-	-	-	-
Lumpkin city	1,131	1,046	-	-	74	-	-	-
Lyons city	4,056	3,579	281	-	-	-	-	-
Macon-Bibb County	143,689	136,562	1,752	-	57	139	143	66
Marietta city	54,162	39,471	6,260	46	-	127	54	82
Morrow city	6,314	3,943	144	-	-	-	30	659
Morven city	534	450	62	-	-	-	-	-
Moultrie city	13,118	11,545	1,079	-	-	-	-	-
Mountain City	748	647	62	-	-	-	-	-
Mount Airy town	1,145	894	91	-	-	-	-	-
Newnan city	31,367	26,998	1,586	-	-	-	102	62
Norcross city	14,502	6,043	3,693	13	-	163	44	362
Oakwood city	3,721	2,529	445	14	-	-	-	105
Offerman city	401	343	53	-	-	-	-	-
Omega city	1,231	815	83	-	-	-	-	-
Palmetto city	4,436	3,374	650	-	-	-	-	-
Peachtree City	33,199	28,412	1,018	-	-	88	126	37
Peachtree Corners city	36,824	26,288	2,572	83	54	560	182	62
Pearson city	1,697	1,078	406	-	-	-	-	-
Resaca town	955	615	124	-	-	-	-	-
Ringgold city	3,343	2,873	197	12	-	-	34	98
Rome city	32,958	27,738	2,789	-	-	1	-	64
Roswell city	86,437	66,030	7,273	322	19	256	236	329
Sandy Springs	91,988	69,620	5,430	197	88	272	202	178
Savannah city	131,656	121,220	3,007	8	16	518	110	302
Smyrna city	48,262	36,745	2,593	83	154	116	111	-
Statham city	2,348	1,846	261	-	-	-	-	6
Sugar Hill city	18,331	13,259	1,614	25	9	-	244	22
Thunderbolt	2,364	2,078	168	-	-	-	-	38
Trion town	1,921	1,366	432	-	-	-	-	-
Tybee Island city	2,991	2,778	151	-	-	-	-	-
Warner Robins	65,002	58,317	1,808	-	-	-	3	444
Willacoochee	1,501	1,165	169	-	-	-	-	-

**ATTACHMENTS**

Attachment 1: LEP CENSUS DATA MAPPING TOOL
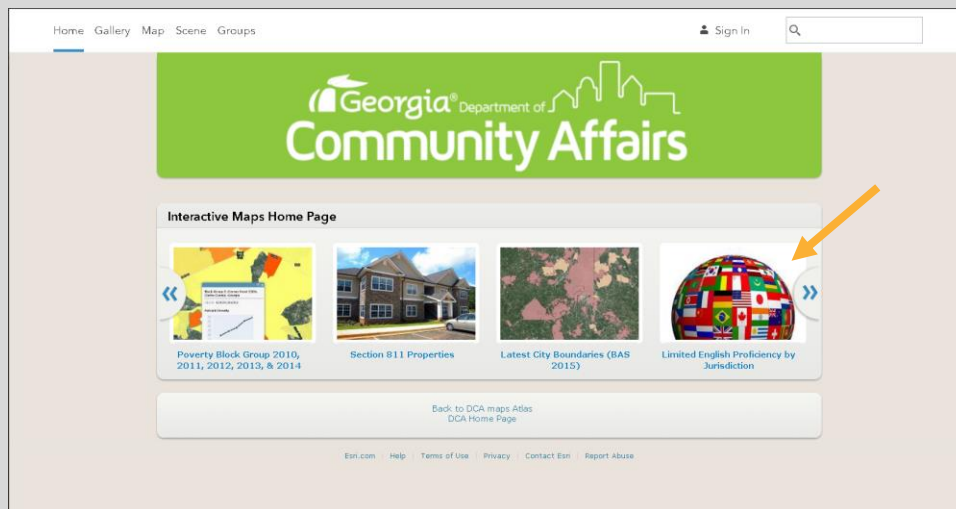
Limited English Proficiency (LEP) by Jurisdiction and Tracts
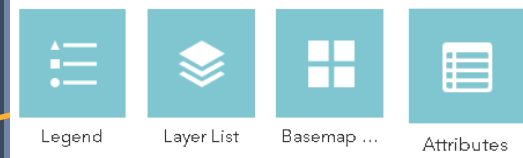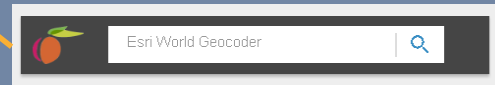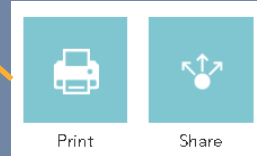
Online Map
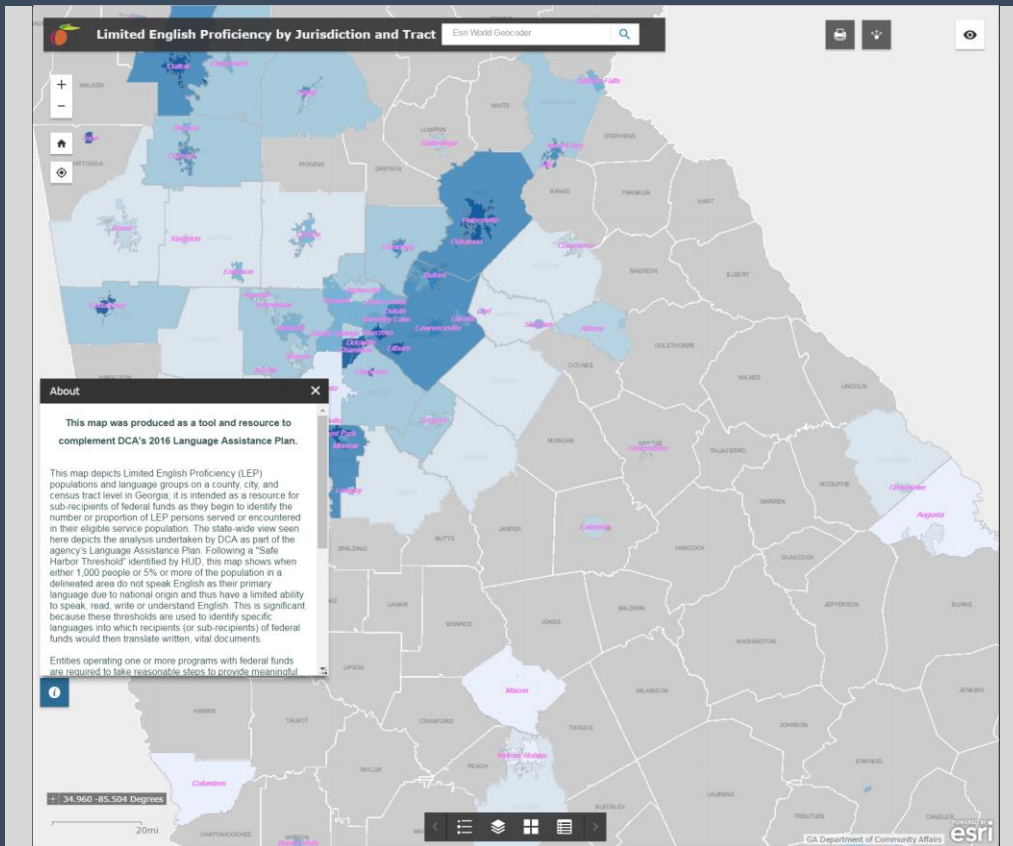
This first look is the overall look at the state of Georgia. From this view, you are able to see the counties where LEP people live, as well as the 12 Regional Commissions. By zooming in, you can get a better understanding of the language needs of your county.
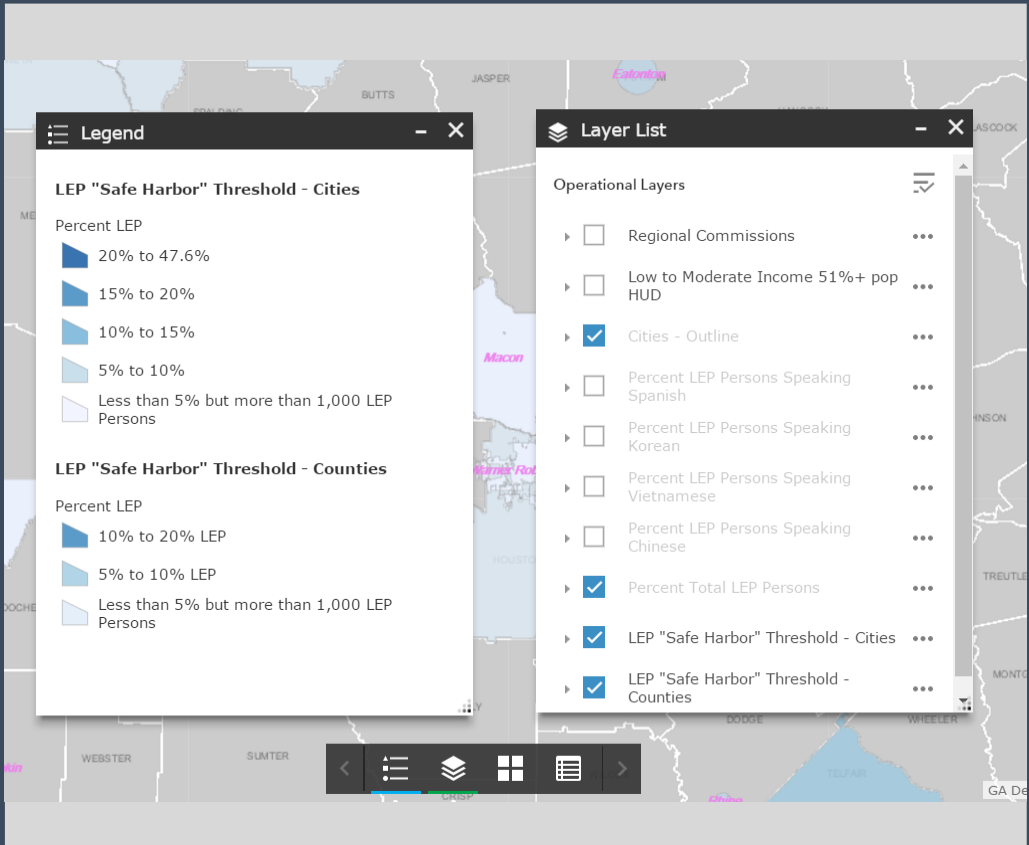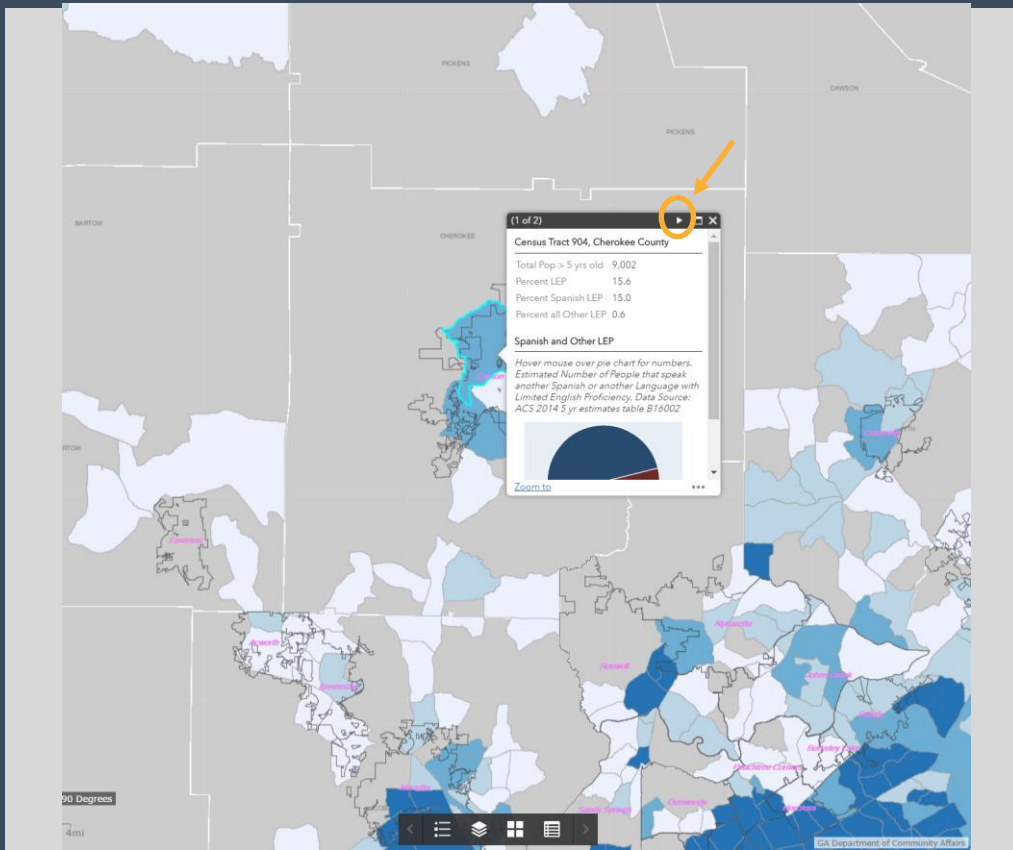
http://arcg.is/2d58qmZ

Key Features

Print   Share

Esri World Geocoder
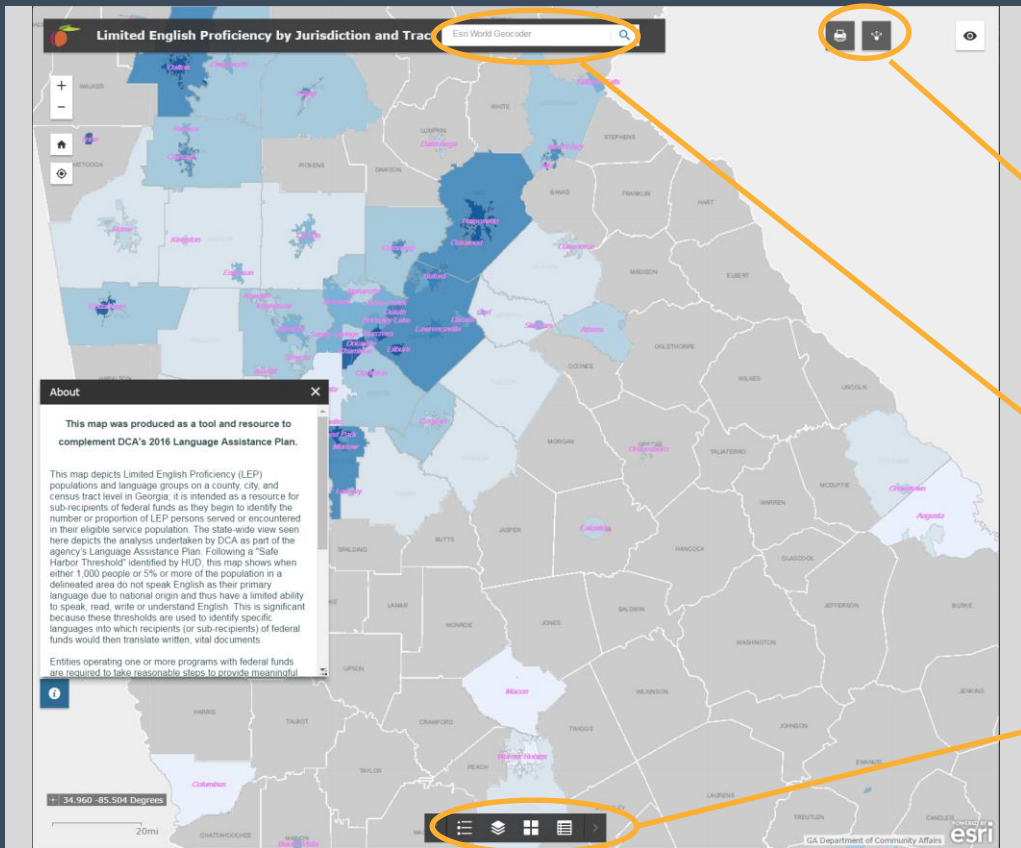
Legend   Layer List   Basemap ...   Attributes

At the bottom of the page, there is the option to view the "Legend" and the "Layer List." The language layers can be changed by selecting the Layer List; here you have the option to change the information on the map. These options, or "layers," include the four most prevalent languages in Georgia, Cities LEP Threshold," "Regional Commissions," "Counties LEP Threshold," and "Low Mod Income 51pct HUD." The map legend shows the percentage of LEP people in a given area. Darker shades of blue denote a higher percent of LEP people, whereas more lightly shaded areas represent a lower percent of LEP people.
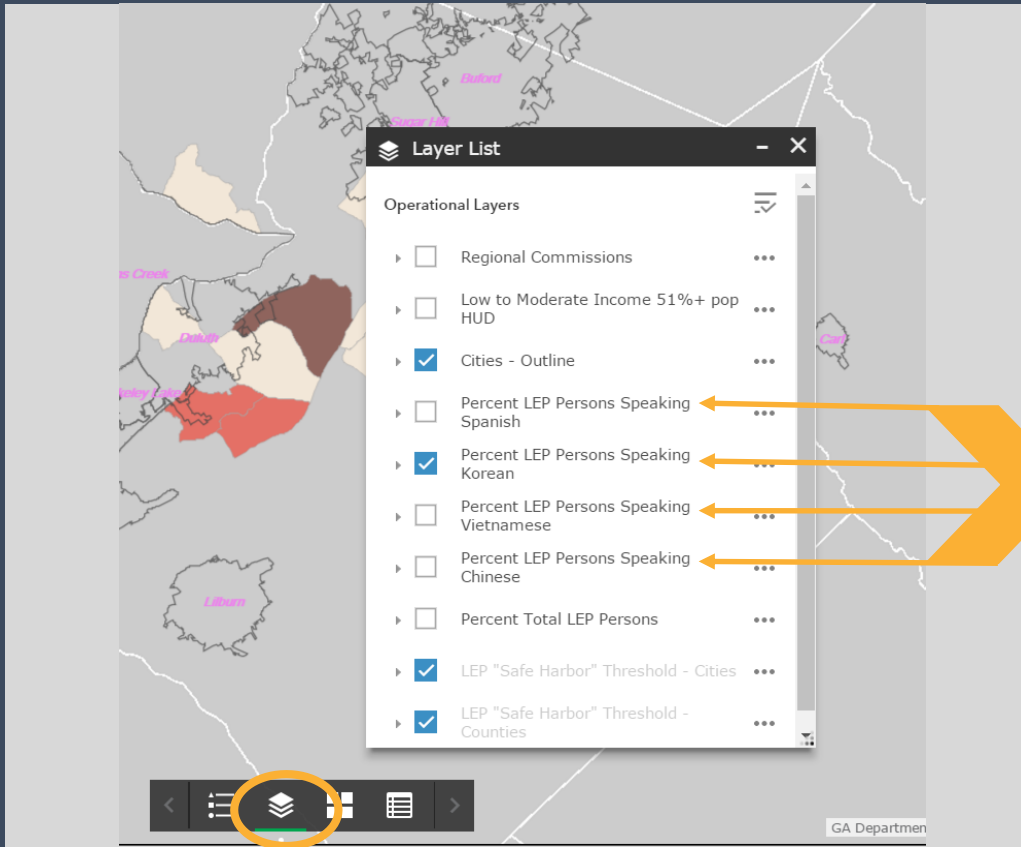
This view allows you to select the percentage of LEP people by language within Census Tracts. Only one language layer may be viewed at a time. The percent of LEP people speaking Spanish is viewable across the State of Georgia. However, only in Clayton, Fulton, Cobb, Forsyth, Gwinnett, and DeKalb Counties do Vietnamese, Korean, and Chinese languages meet or exceed the HUD Threshold. Outside of these counties, no other Census Tracts contain more than 5% LEP people as a share of their population.

This is a zoomed-in look of a county within Georgia. This view will allow you to see the different concentrations of LEP populations by Census Tract. The "Percent LEP by Census Tract" Layer automatically appears when you zoom in. Cities and Counties appear when you zoom out. Cities in which the LEP population meets or exceeds the "Safe Harbor Threshold" still appear with a dark grey outline when zoomed-in.

From this view, clicking on any individual Census Tract or City will open a pop-up box with further details of the given area.

When you click, you are clicking on both the City and the Census Tract. Click on the triangular arrow in the upper right corner of the pop-up box to switch your selection from Census Tract to City and vice versa.

These two views show the pop-up box that appears when clicking on a given Census Tract or City. The languages spoken by Census Tract or City appear in the pie chart. For this example, Spanish or Spanish Creole is the predominant language spoken by LEP people in Canton. In the alternate view, by hovering over the pie chart, you are able to see that, of the 21,862 individuals in the area, there are 2,853 LEP persons.
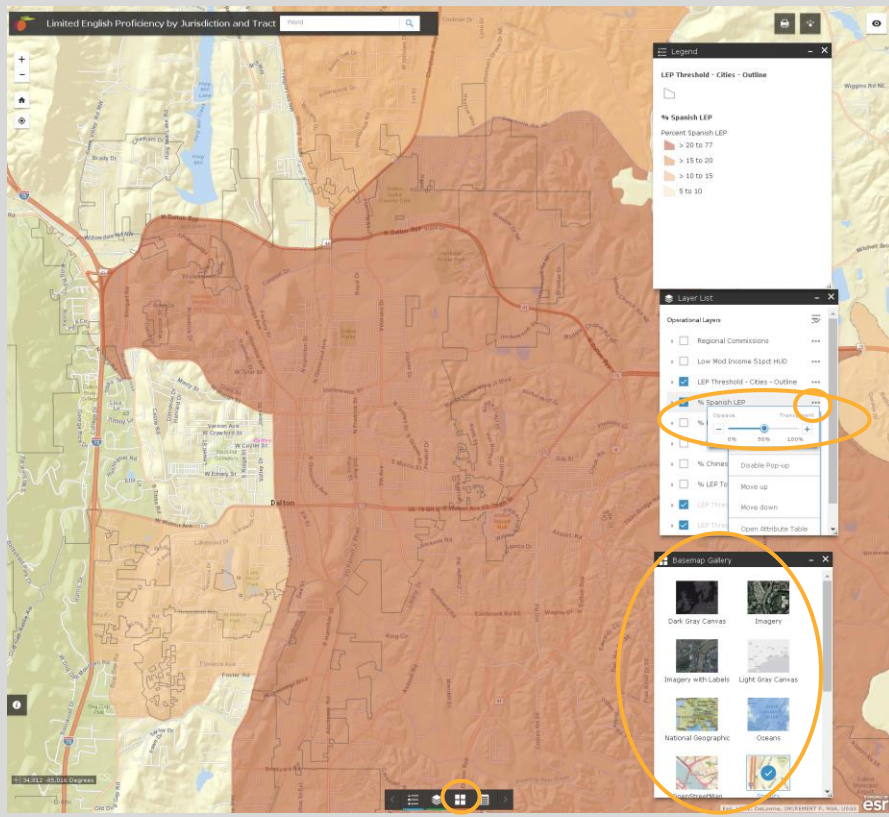
You can change the Basemap and change the transparency of the Layers. Click the (...)
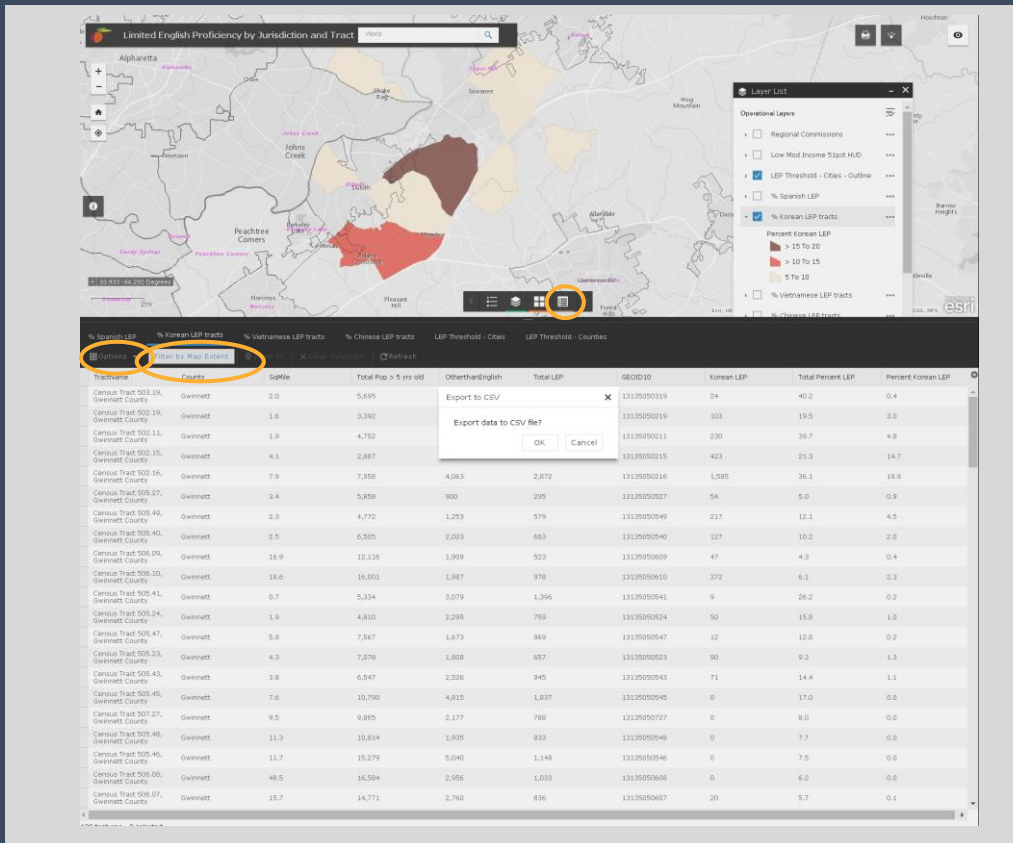
You can access and export all Data Layers here.

You can view the attribute table directly in the map and you can export to a Comma Separated Values (CSV) file.

To do so, click the Attribute Table widget, then click Options and click the option to export all to CSV.

Important! Toggle "Filter by Map Extent" OFF if you want to export everything. If not, it will just export the data in your current view.
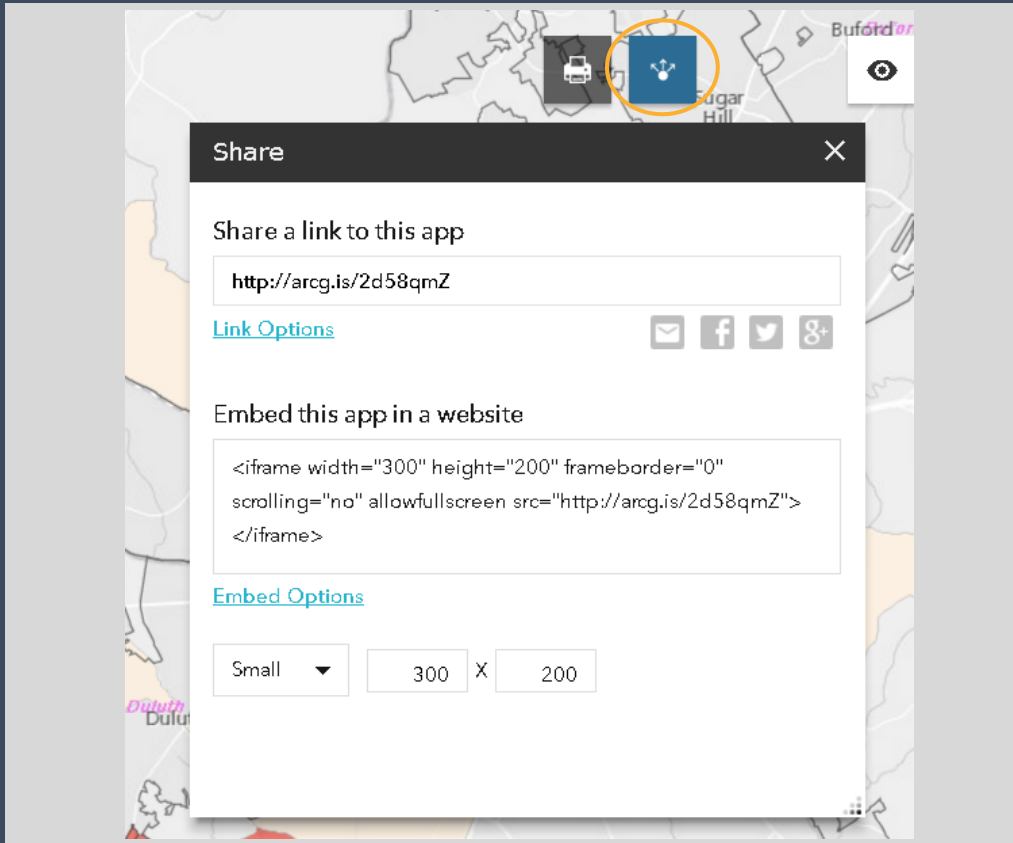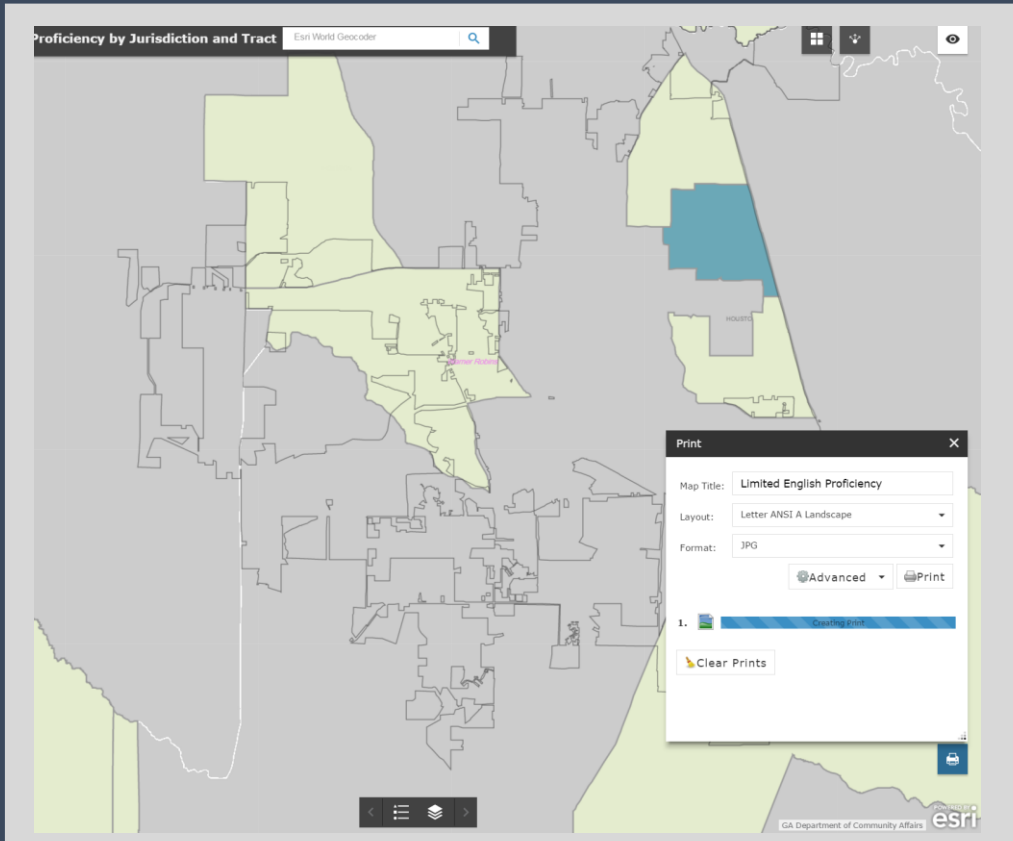
Use the Share widget to get a short URL.

Easily share via email, Facebook, Twitter, and Google Plus.

You can also embed the entire map app into a website!