

**Language Access Plan
Crisp County, Georgia
November 2020**

**210 S. Seventh Street
Cordele, Georgia 31015
229-276-2672**

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LANGUAGE ACCESS PLAN

I. GENERAL INFORMATION

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

1. Grantee: Crisp County, Georgia
CDBG Grant Number: 20p-y-040-1-6123
Target Area: Meadow Park Street and Drainage Improvements

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

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

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Crisp County.

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

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

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

SAFE HARBORS

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

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

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

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

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

Crisp County staff reviewed the most currently available census information from the Georgia DCA website and determined that of the population of 21,382 persons over 5 years of age, 1,093 persons in Crisp County (5.11% of the total population) speak a language other than English. Of those 1093 persons, 337 (1.58% of the total population and 30.8% of the population speaking a language other than English) have limited English proficiency; that is, they speak English less than "very well". In Crisp County, of those persons with limited English proficiency, 217 speak Spanish, 67 speak other Indo-European languages, 51 speak Asian and Pacific Islander languages, and 2 persons speak a language not identified in the Survey.

A review of the residents that are in the FY 20 CDBG Target Area revealed that all are able to understand English very well. There are six persons of Hispanic origin residing in the Target Area. This does not meet the threshold described above for translating vital documents or translated written notice of right to receive free oral interpretation of documents. Oral Interpretation Services are available for clients upon request.

Language Spoken*	# of Residents Over 5 Years of Age*	Speaks English Less Than "Very Well"*
English	20,291 (94.90%)	N/A
Spanish	707 (3.31%)	217 (1.01%)
Other Indo-European	298 (1.39%)	67 (0.31%)
Asian & Pacific and Other	86 (0.40%)	53 (0.25%)
Total	21,382 (100.0%)	337 (1.57%)

CDBG Grant Number: 20p-y-040-1-6123

Target Area: Meadow Park Street and Drainage Improvements

At the present time, GA DCA has identified no Census Tracts in Crisp County that meet LEP criteria:

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

Crisp County Administrative Staff reviewed the frequency with which staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits, as well as public hearings and interactions during surveys. Over the past two years, there have been no requests for interpreters and no requests for translated program documents.

A review of the residents that are in the FY 2020 (20p-y-040-1-6123) CDBG Target Area revealed 6 persons of Hispanic origin, who speak English very well.

Frequency of Interaction: Annually

For Project Applications:

- a. When notifying the public about the potential grant and activities
- b. When surveying income in the target area

3. The nature and importance of programs, activities or services provided by Community Development to the LEP population.

The 2020 CDBG project proposes the construction of street and drainage improvements. As noted above, there are no LEP persons residing in the project neighborhood.

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

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

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

III. LANGUAGE ASSISTANCE

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

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

Sherrie Leverett, Finance Director
Crisp County Board of Commissioners
210 S. Seventh Street
Cordele, Georgia 31015
229-276-2673
sleverett@crispcounty.com

How Crisp County may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation services free of charge in languages LEP persons would understand;
- Add statement (see below) to public meeting and event notices concerning GA DCA/HUD programs;
- All staff involved with Community Development activities will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year; and

- When Crisp County conducts a Public Hearing, an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event (unless previously requested) it will help identify the need for future events; and
- Language Identification Cards/Posters will be used as necessary to determine a client's language needs.

Language Assistance Measures-Although there is a small percentage in Crisp County of eligible LEP households, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. The County Administration will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Interpreters if available will be provided within a reasonable time period; or
 - Language interpretation will be accessed through Language Line Solutions.
3. Language Identification Cards/Posters will be used as necessary to determine a client's language needs.
4. The following statements will be added to public meeting and event notices concerning GA DCA/HUD programs:

"Persons with special needs relating to handicapped accessibility or foreign language should contact Sherrie Leverett, Finance Director at 229-276-2673 before _____. This person can be located at 210 S. Seventh Street, and is available between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, except holidays, or you may call 229-276-2673. Persons with hearing disabilities may consider using the Georgia Relay Service, at (TDD) 1-800-255-0056 or (Voice) 1-800-255-0135."

IV. STAFF TRAINING

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

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

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

V. TRANSLATION OF DOCUMENTS

- Crisp County weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time no documents require translation.

- Due to the relatively small eligible local LEP population, Crisp County does not have a formal outreach procedure in place at this time. Translation resources have been identified. When and if the need arises for LEP outreach, Crisp County will consider the following option:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then relevant documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population, if requested.

VI. MONITORING AND UPDATING THE LAP PLAN

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

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

VII. DISSEMINATION OF THE CRISP COUNTY LAP PLAN

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

VIII. RECORDS

Crisp County will maintain records in the office of the Finance Director regarding its efforts to comply with Title VI LEP obligations. These records will be reviewed periodically and open to the public in an effort to improve service.

IX. COMPLAINTS/FINDINGS

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

Sherrie Leverett, Finance Director
Crisp County Board of Commissioners
210 S. Seventh Street
Cordele, Georgia 31015

Or

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

X. AVAILABLE FEDERAL LEP RESOURCES

HUD's LEP Website:

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

Federal LEP Website:

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

LEP and Title VI Videos:

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

"I Speak" Card:

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



+ Crisp County, GA, USA (2 of 2)

County language for 2020:

Name	Crisp County
Population 5 years and over	21,382
Speak Spanish	707
Speak Spanish / English less than very well	217
Percent speak Spanish / LEP	1.01%
Other Indo-European languages	298
Speak Indo-European / English less than very well	67
Percent speak Other Indo-European / LEP	0.31%
Speak Asian and Pacific Island	86
Speak Asian and Pacific Island / English less than very well	51
Percent Speak Asian and Pacific Island / LEP	0%
Other languages	2
Other languages / English less than very well	2
Percent Other languages / LEP	0.01%

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