

Language Access Plan
Hall County, Georgia
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I. GENERAL INFORMATION

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

1. Grantee: Hall County
CDBG Grant Number: 21p-y-069-1-6201
Target Area: Hall County

This Language Access Plan has been prepared to address Hall County's responsibilities as a recipient of federal financial assistance from the Georgia Department of Community Affairs' programs and grants funded by the U.S. Department of Housing and Urban Development (HUD) as they relate to the needs of individuals with limited English language skills.

This 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, Hall 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 to 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 Hall County.

Hall 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, Hall 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 facilities in Hall County;
2. The frequency with which LEP individuals come in contact with Hall County's programs;
3. The nature and importance of the Hall County's programs and services provided to the LEP population;
4. The resources available to Hall County and the overall cost to provide LEP assistance.

SAFE HARBORS

In accordance with HUD Safe Harbors for LEP, Hall County will translate vital written documents for groups that are at least 5% of the eligible population (and more than 50 persons) or 1,000 persons, whichever is less programs for programs funded by the Georgia Department of Community Affairs/HUD. If there are fewer than 50 persons in a language group that reaches the 5% trigger, Hall County will not translate the vital 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.

Hall County reviewed the 2019 American Community Survey 5-year estimates (Table S1601: *Language Spoken at Home*) and determined that of the population of **185,566** persons over 5 years of age, **53,198** persons in Hall County (28.7% of the eligible population) speak a language other than English. The breakout of the numbers (including those who speak only English) can be found in Table 1 below:

Table 1. Languages Spoken at Home in Hall County

Language Spoken*	# of Residents Over 5 Years Of Age (% of Eligible Population)*		Speaks English Less than "Very Well" (% of Eligible Population)*	
English	132,368	(84.6%)	N/A	
Spanish	48,529	(26.2%)	22,987	(12.4%)
Other Indo-European	2,357	(1.3%)	680	(0.4%)
Asian & Pacific Island	2,104	(1.1%)	1,042	(0.6%)
Other Languages	208	(0.1%)	104	(0.1%)
Total	185,566	(100.0%)	24,813	(13.4%)

Source: 2019 American Community Survey Estimates, Table S1601

Of those **53,198** persons, **24,813** (46.6% of the population speaking a language other than English) have limited English proficiency; that is, they speak English "less than very well." In Hall County, of those LEP persons, **22,987** speak Spanish, **680** speak an Indo-European Language, **1,042** speak an Asian or Pacific Island Language, and **104** speak another language.

Based on the data above, Hall County meets the threshold with Spanish LEP persons described in the "Safe Harbors" section of this document for translating vital documents.

Therefore, for Spanish-speaking LEP persons, Hall County will provide translated vital documents, which are those documents that are absolutely necessary for the person to have Meaningful Access to all programs and activities offered by Hall County that are programs funded by the Georgia Department of Community Affairs/HUD.

2. The frequency with which LEP individuals come into contact with Hall County services.

Hall County staff reviewed the frequency with which staff encounter LEP persons. This includes any citizen who accesses the County's normal programs and services as well as public hearings that have occurred or will occur with HUD funding. A sampling of residential services & programs used by this group includes:

Frequency of Interaction: Daily to Monthly

Documents for programs funded by the Georgia Department of Community Affairs/HUD.

Frequency of Interaction: Yearly

For HUD Federal Grant Applications

- a. When notifying the public about the potential grant and activities (e.g. Pre-Award Public Hearing)

For HUD Federally-Funded Projects

- a. When notifying the public about the grant award and activities (e.g. Post-Award Public Hearing)
- b. When notifying the public about the grant accomplishments (e.g. Closeout Public Hearing)

Hall County will maintain a record of bilingual staff available to serve those seeking services. HUD related Departments will have access to this information in order to respond to a LEP person seeking services by phone or in person. This record will include the name, language proficiencies, and location of staff members who are able to assist with interpretation.

For any and all languages for which Hall County Government staff members are unavailable to provide interpretation services, Hall County may enlist the services of a Certified Court Interpreter listed on the Georgia Commission on Interpreters' website or Georgia Interpreting Services. Additionally, for in-person customers, Hall County will provide language identification cards so LEP persons can identify their language to ensure a proper interpreter is requested.

The most frequent contact Hall County Government has with LEP persons is Spanish-speaking people who may require assistance in Spanish. However, language groups with whom Hall County has less frequent contact will be helped to the greatest extent possible.

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

Hall County Government has a set of organizational values based around the acronym SERVE. The “S” stands for Serving Citizens, the “E” stands for Enhancing Community, the “R” stands for Responsible Stewardship, the “V” stands for Valuing Transparency, and the “E” stands for Efficient Cooperation. Most of Hall County’s population (84.6%) speaks only English. Other than English-speaking individuals, Hall County Government staff is most likely to encounter LEP individuals through customer visits and phone conversations for resident or business services. Hall County is committed to the provision of language services (both written and oral) through bilingual staff, translated vital documents, and to ensure that all citizens have equal access to programs funded by the Georgia Department of Community Affairs/HUD so that all individuals’ rights are protected.

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

Hall County has already invested resources to employ bilingual staff, creating a record of bilingual staff, enlisting the services of a Certified Court Interpreters, provide language identification cards, provide phone interpretation services (via Universal Language Services), and provide sign language interpreting services (via Sign Language Interpreting Specialists, Inc.). Additionally, Hall County will provide a statement on its grants website and in all applicable written materials that Hall County does not discriminate based on LEP and that all services are available regardless of language ability.

Based on the data outlined in first factor of the Four Factory Analysis, Hall County meets the threshold with Spanish LEP persons described in the “Safe Harbors” section of this document for translating vital documents. However, Hall County Government already provides commonly accessed forms used by customers and citizens for the variety of county services in Spanish. Such forms are maintained in the relevant offices at the Hall County Government Center and on the Hall County official website.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and 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 Hall County services. Language assistance can include interpretation, including oral or spoken transfer of a message from one language into another and/or translation, the written transfer of a message from one language into another.

For coordination of LEP compliance, contact:

Human Resources
Hall County Government
P.O. Box Drawer 1435
Gainesville, GA 30503
(770) 531-6712

If LEP persons have a need for interpretation services, related to programs funded by the Georgia Department of Community Affairs/HUD, the following procedures shall be followed:

- Hall County will maintain a record of bilingual staff available to serve those seeking services. Departments will have access to this information to respond to a LEP person seeking services by phone or in person. This record will include the name, language proficiencies, and location of staff members who are able to assist with interpretation.
- For all languages for which Hall County Government staff members are unavailable to provide interpretation services, Hall County may enlist the services of a Certified Court Interpreter listed on the Georgia Commission on Interpreters' website. Additionally, for in-person customers, Hall County will provide language interpretation cards so LEP persons can identify their language to ensure a proper interpreter is requested.
- If a person needs interpretation services over the phone in a language in which no staff members are proficient, Hall County Government will contact Universal Language Services. A Hall County staff member will be provided with the necessary information and procedures for obtaining Universal Language Services in the event a LEP person calls.
- If a person is deaf or hard of hearing, Hall County will use Interpretk to provide access to services, if no Hall County staff member is available who can provide sign language services. Additionally, Hall County Government will have staff available and trained to respond to TTY telephone equipment for incoming calls.
- Hall County Government will provide a statement on its website and in all written materials that the organization does not discriminate based on LEP and that services are available regardless of language ability.

IV. STAFF TRAINING

Hall County staff will be trained to utilize the record of bilingual staff to serve those seeking services by phone or in person.

V. TRANSLATION OF DOCUMENTS

- If a Spanish-speaking LEP person needs translated written vital documents to access Hall County Government's programs and services, Hall County Government will ensure that programs funded by the Georgia Department of Community Affairs/HUD forms used by customers and citizens for the variety of county services will be provided in Spanish. Such forms will be maintained in the relevant offices and on the county website.

- Provision of translated written documents in any language other than Spanish is not required because no other language meets the threshold as outlined in the “Safe Harbors” section of this plan.

VI. MONITORING AND UPDATING THE LAP PLAN

Hall County will update the LAP Plan as required. At a minimum, the plan will be reviewed and updated every five years using the U.S. Census Bureau for census information or when it is clear that higher concentrations of LEP individuals are being served at the Hall County Government Center. Updates will include the following:

- The number of documented LEP persons 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 customer/citizen translation mechanism has been effective and sufficient to meet the need;
- Determine whether Hall County fully complies with the goals of this LAP Plan; and
- Determine whether complaints have been received concerning the County and/or the County’s failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE HALL COUNTY LAP

The LAP will be on Hall County’s official website and provided to anyone requesting the information.

VIII. RECORDS

Hall County will maintain records in the County Compliance Specialist’s office regarding its efforts to comply with Title VI LEP obligations. These records will be reviewed periodically and open to the public in an effort to improve service.

IX. COMPLAINTS/FINDINGS

Any person who believes they have been denied the benefits of this LAP or that Hall County has not complied with Title VI of the Civil Rights Act of 1964, U.S.C. 2000(d) and Executive Order 13166 regulations may file a complaint with the County’s 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:

Human Resources
Hall County Government
P.O. Box Drawer 1435
Gainesville, GA 30503
mtuck@hallcounty.org

Or

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

X. AVAILABLE FEDERAL LEP RESOURCES

U.S. Department of Housing and Urban Development (HUD) 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" Cards
<http://www.lep.gov/ISpeakCards2004.pdf>