

**Language Access Plan
City of Camilla, Georgia
Community Improvement Department
November 2020**

**30 East Broad Street
P.O. BOX 328
Camilla, GA 31730
(229) 336-2224**

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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: City of Camilla, GA
CDBG Grant Number: 19p-x-101-2-6116
Target Area: Marietta Street, N. Scott Street, Palmer Street, N. Butler Street, W. Circle, W. Oakland Ave. Camilla, Georgia (Census Tract for the City of Camilla:
0.44% LEP: Spanish 0% , Asian and Pacific Island 0.44%, and 0% Other)

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

The plan has been prepared to ensure compliance with HUD's guidance and Title VI of the Civil Rights Act of 1964, and its implementing regulations. Under HUD's guidance, the City of Camilla 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 understands 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 the City of Camilla.

The City of Camilla 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, the City of Camilla used HUD’s four-factor LEP analysis which considers the following factors:

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

SAFE HARBORS

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

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

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

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

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

The City of Camilla Community Improvement staff reviewed the 2014-2018 American Community Survey 5-year estimates from the United States Census Bureau and determined that of the population of 4,821 persons over 5 years of age, 114 persons in Camilla (0.4% of the total population) speak a language other than English. Of those 114 persons, 63 (1.3% of the total population & 51 persons or 1.1% of the population speaking a language other than English) have

limited English proficiency; that is, they speak English less than “very well”. In Camilla, of those persons with limited English proficiency, 63 speak Spanish and 51 speak Asian and Pacific Island languages.

A review of the residents that were in our FY 2020 (19p-x-101-2-6116) CDBG Target Area revealed (other than White or African-American) 0 Hispanic Individuals (0% of the area population, all able to understand English very well) 0 Multi-Racial, 0 Native American and 0 Unknown (survey information not available). Housing applicants for our FY 2020 CDBG Neighborhood Revitalization Application (Proposed) showed zero (0) Hispanic households or other households. 97% were African-American and 3% were white. 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. However, in the past, all of our clients have provided their own translator with whom they are comfortable sharing personal information.

Language Spoken*	# of Residents Over 5 Years of Age*	Speaks English Less Than “Very Well”*
English	4,707 (97.6%)	N/A
Spanish	63 (1.3%)	0 (0%)
Asian & Pacific Island	51 (1.1%)	21 (41.2%)
Total	4,821 (100.0%)	21 (41.2%)

CDBG Grant Number: 19p-x-101-2-6116

Target Area: Marietta Street, N. Scott Street, Palmer Street, N. Butler Street, W. Circle, W. Oakland Ave. Camilla, Georgia (Census Tract for the City of Camilla: 0.44% LEP: Spanish 0% , Asian and Pacific Island 0.44%, and 0% Other)

At the present time, GA DCA has identified No Census Tract in the City of Camilla that meets LEP criteria:

Census Tract, Mitchell County*

Census Tract	Mitchell County	City of Camilla
Total population >5 years old	21,075	4,821
Percent LEP	2.08%	0.44%
Percent Spanish	1.91%	0%
Percent Other LEP	0.17%	0.44%

*2014-2018 American Community Survey 5-year estimate from the United States Census Bureau.

NO existing or planned CHIP or CDBG projects (or another GA DCA/HUD funded assistance) exist in this Census Tract area. Should any projects be planned in this Census Tract area, the City of Camilla will provide Translated Vital Documents to those residents in the proposed project areas.

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

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

A review of the residents that were in our FY 2020 (19p-x-101-2-6116) CDBG Target Area revealed (other than White or African-American) 0 Hispanic Individuals (0% of the area population, all able to understand English very well) 0 Multi-Racial, 0 Native American and 0 Unknown (survey information not available). Housing applicants for our FY 2020 CDBG Neighborhood Revitalization Application (Proposed) showed zero (0) Hispanic households or other households. 97% were African-American and 3% were white. 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. However, in the past, all of our clients have provided their own translator with whom they are comfortable sharing personal information.

Frequency of Interaction: Annually

For Project Applications:

- a. When notifying the public about grant award application and its proposed activities
- b. When notifying the public about grant award and its funded activities
- c. When seeking applicants to participate in the program (e.g., when seeking homeowners for rehabilitation assistance)
- d. When seeking qualified contractors
- e. When working with homeowners selected for assistance
- f. When seeking bids from builders to construct the homes
- g. When notifying the public about the grant award closeout and its accomplishments

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

Housing plays a critical role in maintaining quality of life. Community Improvement is committed to ensure access to safe, sanitary and affordable housing for our eligible clients. Outreach throughout the community helps to ensure a Warmness of our programs. The majority of the City's population- 97.6% speaks English. Other than English speaking individuals, Community Improvement staff are most likely to encounter Spanish speaking LEP individuals through office visits, phone conversations and during surveys. Upon client request, the City of Camilla will provide oral interpreters using bi-lingual employees or qualified contract interpreters. To date, all LEP individuals have provided their own interpreter-a child or friend.

Nature of the Program(s): CDBG Sewer Improvements.

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

4. The resources available to the City of Camilla, and overall cost to provide LEP assistance.

The City of Camilla 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 (770-455-7141) for which the City of Camilla 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 Improvement services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

The Name of the individual at the City of Camilla responsible for coordination of LEP Compliance is:

Santos Gonzales, City Firefighter

City of Camilla

P.O. Box 328-Camilla, Georgia 31730

(229) 330-2325

cford@cityofcamilla.com

How the Community Improvement staff may identify an LEP person who needs language assistance:

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

- When Community Improvement 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 Camilla 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 Community Improvement staff 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 for the Spanish language 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 shall contact Cheryl Ford, City Clerk at (229) 330-2325. This person can be located at the Camilla City Hall 30 East Broad Street, Camilla, Ga. 31730 between the hours of 8:00 to 5:00 Monday through Friday, except holidays. Individuals who are hearing impaired can contact the Georgia Relay Services, telephone number (TDD) 1-800-255-0056, (Voice) 1-800-255-0135."

IV. STAFF TRAINING

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

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

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

V. TRANSLATION OF DOCUMENTS

- The City of Camilla 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, the City of Camilla 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, the City of Camilla 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

The City of Camilla will update the LAP Plan as required. At a minimum, the plan will be reviewed and updated every five years using the United States Census Bureau for census information, or when it is clear that higher concentrations of LEP individuals are present in the City of Camilla. 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 the City of Camilla's financial resources are sufficient to fund language assistance resources needed;
- Determine whether the City of Camilla fully complies with the goals of this LAP Plan; and
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE CITY OF CAMILLA'S LAP PLAN

The LAP Plan will be on the City of Camilla's website page and provided to anyone requesting the information.

VIII. RECORDS

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

IX. COMPLAINTS/FINDINGS

Any person who believes they have been denied the benefits of this LAP or that the City of Camilla 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 City LAP Coordinator. The City 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:

Santos Gonzales, City Firefighter

City of Camilla

P.O. Box 328-Camilla, Georgia 31730

(229) 330-2325

cford@cityofcamilla.com

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>