

Georgia Department of Community Affairs

Language Access Plan

I. Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The Georgia Department of Community Affairs (DCA) is a recipient of federal funds for a portion of its programs and, thus, obligated to reduce language barriers that can preclude meaningful access by LEP persons to DCA programs. 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 persons who have limited English proficiency.

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) frequency with which LEP persons come into contact with Agency’s program, (3) nature and importance of the program, activity, or service to people’s lives, and (4) resources available and costs. DCA will review and update, on an annual basis, this LAP in order to ensure continued responsiveness to community needs.

II. Purpose

The purpose of this plan is to ensure clients of DCA meaningful access to services, programs, and activities although they may be limited in their English language proficiency. DCA is committed to this Language Access Plan as the appropriate response to meeting our clients’ needs.

III. Definitions

Recipient means the entity designated as a recipient for assistance with federal or state funding. This is any entity which receives federal assistance, directly from DCA or from another recipient. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, contractor, private agency or institution, builder, property manager, residential management corporation, or cooperative association.

LEP means Limited English Proficiency. Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Note that for the purposes of gathering data for the four-factor analysis, DCA used the U.S. Census definition as any individual who speaks a

language at home other than English as their primary language, and who speaks or understands English “not well” or “not at all”.

LAP means this language access plan.

IV. Analysis

DCA Description

The Georgia Department of Community Affairs (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 the Department of Community Affairs. 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; provides rental assistance for eligible households; and serves as the lead agency for the state's solid waste reduction efforts. DCA's Mission Statement is “Partnering with communities to help create a climate of success for Georgia's families and businesses.”

DCA is comprised of the following Groups which administer various state and federally funded programs:

DCA Housing Group which includes:

- **Rental Assistance Division**
The Rental Assistance Division (RAD) administers the Housing Choice Voucher (HCV) rental assistance program which assists extremely low-income, very low-income and low-income families obtain decent and affordable housing in the private market. RAD administers the HCV, Veterans Administration Supportive Housing (VASH), Mainstream, Enhanced Voucher, Project Based, and Homeownership programs.
- **Housing Finance and Development Division**
The Housing Finance and Development Division administers single-family homeownership and multi-family rental housing programs. The programs it administers include the Georgia Dream Homeownership Program, Low-income Housing Tax Credit (LIHTC), HOME Investment Partnership Program, Sec. 1602 Tax Credit Exchange Program, and Tax Credit Assistant Program. Within the division, the Office of Housing Finance provides affordable financing to assist low and moderate income Georgia residents with homeownership and rental housing while the Office of Portfolio Management is responsible for the compliance monitoring and asset management of the programs.

- **Housing Policy and Administration Division**
 Within this Division, the Office of Program and Public Affairs (OPPA) administers DCA's programs (1) to assist the homeless and individuals with disabilities, including the administration of federal Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), Shelter Plus Care (S+C), Section 811 Project Rental Assistance Demonstration (811), and HOME-funded Tenant Based Rental Assistance (TBRA); (2) to fund eligible applicants to administer HOME-funded down payment and homeowner rehabilitation assistance programs in their communities; (3) to provide housing and foreclosure mitigation counseling; (4) to provide outreach to local governments, community leaders, private organizations regarding DCA's housing programs; (5) to administer the overarching reporting and compliance requirements of the federal HOME program, the federal Consolidated Plan, and the Continuum of Care. The balance of the Division outside of OPPA includes DCA's loan portfolio administration section for DCA's homeownership programs, legal affairs for DCA's housing initiatives, and mortgage revenue bond administration.
- **HomeSafe**
 The HomeSafe Georgia program provides eligible Georgia homeowners who are struggling to make their mortgage payment due to unemployment or under-employment due to no fault of their own with up to 18 months of mortgage payment assistance to possibly prevent foreclosure.

DCA Community Development and Finance Group which includes:

- **Community Finance Division**
 This Division is comprised of the Office of Community Development, the Office of Economic Development, and the Office of Field Services. These offices administer the following types of programs: Federal and State Community and Economic Development programs such as the Community Development Block Grant (CDBG) and Neighborhood Stabilization (NSP) Programs. The primary purpose of these programs is to enhance the livability of communities by creating jobs, and investing in critical infrastructure and housing improvements.
- **Community Development Division**
 This Division is comprised of the Office of Planning and Environmental Management, Office of Construction Codes and Research, Georgia Commission on Service and Volunteerism, and the Office of Downtown Development. These offices administer the following types of programs: State Planning and Community Development programs such as comprehensive planning, downtown development, Main Street, water resource management, Signature Communities, Communities of Opportunity, and design services; Building Codes programs such as the State Building Code, Construction Codes and the Industrialized Building program; Research and Surveys programs including statutorily required local government surveys, financial reporting, and the

Government Management Indicator Survey; and Service and Volunteerism programs including Americorps, Keep Georgia Beautiful and the Martin Luther King, Jr., Advisory Council.

DCA Administration & Finance Group which includes:

- Administration Division

This Division is comprised of the Office of Administrative Operations, the Office of Information Technology and the Office of Human Resources. The goal of these Offices is to provide quality seamless customer service to all internal and external customers. Administrative Operations provides administrative support services including asset management, building management, DCA fleet vehicle management, mail management, office supply/equipment management, print/publication management, reception, records management, risk management, and telecommunications. The Office of Information Technology provides technology support for the external website, the SharePoint intranet site, web and PC applications, database management, video management, publication and graphic creation, server management, email management, data backup management, end user computer support, printer support, technology help desk, mobile device support, IT security management, and GIS management. The Office of Human Resources provides a variety of services in the areas of recruitment, employee relations, compensation and benefits, and performance management. Some examples of these services include coordinating the recruitment/selection process, administering the position classification, compensation, and performance management systems, managing the employee benefit program, and assisting managers to attract, retain, and train a competent workforce.

- Finance Division

This Division is comprised of the Office of DCA Accounting, the Office of GHFA Accounting, Treasury Services, State Home Mortgage, and Budgeting. The goal of these offices is to provide quality seamless customer service to all internal and external customers. DCA and GHFA Accounting provide accounting, payroll, and procurement services for all DCA and GHFA operations. Treasury Services manages the investment portfolios for DCA and its entities. State Home Mortgage services the mortgage loans made under the Georgia Dream Program. The budget unit is responsible for developing, monitoring, and managing the budget for DCA and its entities.

DCA Executive Group which includes:

- Executive Division

This Division is responsible for overall agency performance, including alignment of resources, policy development with the Board of Directors and Executive Team, communication with constituents and partners, relationships with other

organizations and the legislature, and provision of general policy guidance to the various operating divisions. The Executive Office is led by the Commissioner, appointed by the Governor and the Board, who also serves as the Executive Director of the Georgia Housing and Finance Authority. It includes the agency Chief of Staff and Governmental Affairs Director. Also in the Executive Office is the External Affairs division, which provides services and programs designed to provide outreach to rural and regional locations for policy and program development as well as youth development programs.

Likely Points of Contact between DCA and the LEP Population

DCA has determined that persons with LEP are most likely to come into contact with Agency programs as follows:

- Persons seeking to access to housing or housing assistance in any program funded by or through DCA.
- Persons seeking relief from pending foreclosure proceedings.
- Persons that visit any of DCA's offices to receive information regarding programs or other services.
- Persons seeking to participate in the planning process for DCA programs or services.
- Persons who reside in DCA funded affordable housing who have a question or problem with property ownership or management.

Identifying Georgia's LEP Population Who May Need Language Assistance--Factor One

Per the 2010 American Community Survey, approximately 86.7% of Georgia's population speaks English, and 13.3% speak a language other than English. 17.8% of Georgia's population speaks Spanish or Spanish Creole, and 2.4% speak other indo-European languages and 2.2% speak Asian and Pacific Island Languages. No other ethnicity has a sizeable limited English proficiency. The Migration Policy Institute identified the Top Five LEP populations in Georgia as Spanish, Korean, Vietnamese, Chinese, and African languages.

The State of Georgia has identified 18 counties where LEP populations exceed the Department of Justice's Safe Harbor 5% threshold¹. These are depicted in the following table:

County	Total Population	Total LEP Population	Language 1 (name)	Language 1 (LEP number)	Language 1 (LEP % of total pop)
Atkinson County	7,600	800	Spanish	800	10.1
Clayton County	238,600	25,600	Spanish	16,400	6.9
Cobb County	634,900	50,400	Spanish	34,300	5.4
Colquitt County	41,300	4,200	Spanish	3,900	9.5

DeKalb County	639,100	57,900	Spanish	33,900	5.3
Echols County	3,700	1,100	Spanish	1,100	30.2
Evans County	10,100	700	Spanish	700	6.9
Gilmer County	26,500	1,600	Spanish	1,600	6
Gordon County	50,600	4,100	Spanish	3,800	7.5
Grady County	23,000	1,400	Spanish	1,300	5.8
Gwinnett County	731,200	116,900	Spanish	70,900	9.7
Habersham County	39,900	2,700	Spanish	2,200	5.6
Hall County	163,700	24,500	Spanish	23,100	14.1
Murray County	36,900	2,600	Spanish	2,500	6.6
Polk County	38,000	2,400	Spanish	2,200	5.7
Telfair County	15,300	1,300	Spanish	1,200	8
Tift County	37,200	2,300	Spanish	2,000	5.3
Whitfield County	92,800	15,900	Spanish	15,200	16.4

1 Source: Migration Policy Institute Tabulations from the US Census Bureau's pooled 2009-2011 American Community Survey (ACS) and 2007-2011 ACS.

Frequency with Which LEP Persons May Come Into Contact With DCA's Programs –Factor Two

Considering DCA's diverse array of programs and services that are available in the counties identified above, it is likely that LEP persons may have direct contact with some programs and staff. See the list of Likely Points of Contact for instances where there is an increased probability that Language Assistance will be needed.

Nature and Importance of the Program, Activity, or Service Provided By DCA – Factor Three

Several programs and services offered by DCA may provide direct assistance to LEP individuals and families; therefore the type of proposed activities may be critical in determining the type of language access needed. Of particular importance will be those instances when DCA or one of its Recipients is providing a direct service to an individual or household or where Citizen Participation is part of the vital process for determining state and local needs and program policies.

V. Language Access Plan—Factor Four

This Language Access Plan represents DCA's administrative blueprint to provide meaningful access to Agency services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks DCA will undertake to meet this objective and identifies the resources available and costs to DCA

DCA has taken the following actions to address LEP:

Updated May 2015

- 1) DCA has appointed a DCA Language Access Coordinator. As of this plan date, the coordinator is:

Office Coordinator
Georgia Department of Community Affairs
60 Executive Park South, NE
Atlanta, GA 30329
404-679-4839.
fairhousing@dca.ga.gov

Each Division also has a language access contact staff member assigned to assist division staff with language access issues. The Current Division contact list is attached to this Plan as Exhibit A.

If the need for access services is identified either by phone, email, or in person, staff shall immediately contact their division language access contact who will take appropriate action to ensure meaningful communication through the methods described below. If the Division contact is not available for a particular Division, staff will contact other staff listed on Exhibit A for assistance. In addition, the DCA Language Access Coordinator will also be available as a resource in obtaining assistance.

- 2) DCA has identified resources that shall be used to ensure access to all programs and services offered by DCA in the above identified areas, and shall employ the following resources to achieve that goal:
 - Employ interpreters when necessary by phone – through a contract with Language Line Solutions which interprets spoken word in various languages.
 - Maintain a listing of identified DCA staff members who are proficient in languages other than English and who are willing to assist in interpretation issues.
 - Each DCA field office (Rental Assistance Division) is equipped with a global language translation device that can translate 12 or more different languages allowing staff to effectively communicate with LEP persons.
 - The DCA central office is equipped with global language translation devices that can translate 12 or more different languages allowing staff to effectively communicate with LEP persons.
 - Employ Receptionist(s) in the Atlanta office who are proficient in Spanish. An employee in each regional office will be trained in conversational

Spanish. Receptionists will be trained on the use of I-Speak cards to identify the language needs of visitors.

- Require one staff member in the RAD Office of Compliance to be proficient in Spanish.
- Require one staff member in the Portfolio Management/Compliance office to be proficient in Spanish.
- Require at least two staff members in the HOMESAFE Georgia office to be proficient in Spanish.
- HOMESAFE will employ at least one bi-lingual trainer
- Maintain contracts for interpretation of documents. DCA currently contracts with the following firms:

Language Line Solutions
LATN, Inc.
Interpreters' Unlimited

- GeorgiaHousingSearch.org is a DCA-sponsored database of affordable rental properties across Georgia. The tool provides detailed information about rental properties, enabling individuals and families searching for housing to locate a unit that best fits 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 fast, easy-to-use FREE search lets people look for rental housing using a wide variety of criteria, including number of bedrooms, rent range, accessibility features, access to public transportation, and criminal background and credit check requirements. Housing listings display detailed information about each property, including a mapping feature, pictures, and direct contact information with rental agents. The service also provides links to housing resources and helpful tools for renters such as an affordability calculator, rental checklist, language translator (71 Languages), and information about renter rights and responsibilities. DCA requires that all participants in its rental housing development program participate in listing their properties into the GeorgiaHousingSearch.org database. Information related to GeorgiaHousingSearch.org is attached to this plan as Exhibit B.

- DCA shall translate Vital Documents for programs that are frequently accessed directly by citizens. DCA has determined that the Fair Housing Brochure, Citizens Participation Plan, Reasonable Accommodation forms and Grievance procedure forms should be translated into Spanish.

- Because the cost of translating documents is very high, DCA will undertake a two year review of identifying additional vital documents and determining the best way to undertake translation services.
 - DCA also uses local community services such as law enforcement agencies, organizations, churches and /or schools that offer translators and interpreters. Examples include (but are not limited to): The Latin American Association, local school districts, and ecumenical organizations.
- 3) **Staff Training.** DCA staff shall be trained in the Agency Protocols for implementation of this Language Access Plan in group workshop sessions conducted by the DCA Language Access Coordinator. Trainings shall occur on an annual basis. Division language access contacts shall provide training to new staff members.
- 4) **Notification.** DCA shall maintain notices on its website of the availability of translation and interpretation services. DCA outreach staff will also provide information relating to DCA's translation and interpretative services to industry partners. Staff that uses Constant Contact to keep participants informed of available resources will add a link to DCA's Fair Housing website which will contain information related to the availability of interpretative services offered by DCA.
- DCA will monitor, maintain and update LEP requirements as required by HUD at least annually and/or as changes occur.
- 5) DCA will provide its Recipients in the 18 counties listed in the Table above technical assistance regarding their responsibilities to provide Language Access Services using DCA's 4-factor analysis and this Plan as a template for meeting their obligations under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166.
- 6) **Documentation** DCA shall use its existing Customer Service Database System (CSMS) to document all requests for reasonable accommodation and actions taken to address those requests.

VI. Complaints

Complainants may file a complaint with the DCA Language Access Coordinator if it is believed you have been denied the benefits of this Plan. Complaints will be investigated pursuant to DCA's Grievance procedures. To file a complaint with the DCA Language Access Coordinator, submit the written complaint to:

DCA Language Access Coordinator
Georgia Department of Community Affairs
60 Executive Park South, NE
Atlanta, GA 30329
404-679-4839.
fairhousing@dca.ga.gov

OR

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

**Assistant Secretary for Fair Housing and Equal Opportunity
Department of Housing and Urban Development
Regional Field Office
40 Marietta Street
Atlanta, GA 30303**