

**The Center for Family Resources
Language Access Plan
2018 – 2023**

Section 1: Introduction

Federal guidance mandates that The Center for Family Resources (CFR), a direct recipient of federal funds and a sub-recipient of federal funds awarded by the Georgia Department of Community Affairs (DCA) and the Cobb County CDBG Program Office, is obligated to reduce language barriers that could preclude Meaningful Access by LEP persons to CFR's programs that are funded with such federal financial assistance. CFR has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken to ensure Meaningful Access to the organization's federally-funded services, programs, and activities on the part of LEP persons. In preparing this Plan, CFR 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 organization or its federally funded programs; (2) the frequency with which LEP persons come into contact with CFR's applicable programs; (3) the nature and importance of these 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: Policy

It is the policy of The Center for Family Resources to comply with all federal statutes and regulations in the administration of federally funded programs. Pursuant to the requirements of Title VI, recipients of federal funds and sub-recipients of federal funds received through an administration grant/award made by DCA and other funders are required to make reasonable efforts to provide timely, Meaningful Access for LEP persons to federally-funded programs and activities. In order to do so, CFR will conduct an assessment to determine the need for language assistance within its service area. This is accomplished by conducting the Four-Factor Analysis. After completion of the Four-Factor Analysis, CFR will understand the languages spoken by LEP persons in its service area and can determine how to provide needed language assistance. Based upon the findings of the Four-Factor Analysis, and when deemed necessary, CFR will prepare an LAP addressing the organization's plan for ensuring Meaningful Access to federally funded programs and activities for LEP persons. CFR, along with all other recipients and sub-recipients, retain flexibility in determining how to appropriately address the needs of the LEP population(s) they serve.

The Center for Family Resources will take timely and reasonable steps to provide LEP persons with Meaningful Access to applicable programs and activities conducted by the organization. Access to these programs and services will not be impeded as a result of an individual's inability to speak, read, write or understand English. CFR will review and update its LEP Four-Factor Analysis and LAP at least every five years.

CFR administrators will receive training from DCA on procedures to implement and continuously monitor and evaluate the implementation of LAPs in the State of Georgia.

CFR is also required to select an individual responsible for 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.

Section 3: Purpose and Plan Overview

The purpose of this Plan is to analyze the location and needs of any LEP individuals in CFR's service area, 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 also describes how CFR will promote Meaningful Access and provide substantially equal and meaningfully effective access to its federally-funded programs and services for LEP individuals, as well as eliminate or reduce LEP as a barrier to receipt of services offered by the organization's applicable programs and activities.

Under this plan, CFR 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.

The Center for Family Resources will continually monitor the effectiveness of its Plan in eliminating barriers to Meaningful Access for LEP individuals, as well as report regularly compliance to DCA or other funders, as outlined below.

CFR will engage in outreach efforts to ensure that LEP persons are aware of the language access services available to them.

Section 4: 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.

Client: An individual communicating with CFR regarding services or a current/former recipient of services from a CFR program.

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 sub-recipient employee and who has contact with, or is seeking information or services from, sub-recipient 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).

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 federally-funded 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. 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).

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 5: Four-Factor Analysis

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

For the first factor, the recipient/sub-recipient must determine the number or proportion of LEP persons served or encountered in the relevant programs' service area. This number or proportion should reflect not just those LEP individuals that already come in contact with the sub-recipient or program but the maximum total LEP population that could be reached if outreach to LEP individuals eligible to be served were increased. The following table indicates the languages spoken and the number and proportion of the LED population in Cobb County,

Georgia that exceed 1,000 persons as based on DCA’s Interactive Maps, “Limited English Proficiency by Jurisdiction”.

Jurisdiction: Cobb County
 Total Population: 660,920
 Total LEP Population: 44,848

Language	Total LEP Population	LEP % of Total Population
Spanish	33,354	5%
Chinese	1,843	2.8%
Vietnamese	1,752	2.7%
Portuguese	1,528	2.3%
Korean	1,397	2.1%

The Center for Family Resources will update this data on its mapping tool every five years in accordance with the overall update of its LAP policy.

Factor 2: Frequency with which LEP Individuals Come into Contact with the Program(s)

CFR conducted an internal assessment to identify whether its applicable programs directly assist members of the public, as well as the frequency with which members of the general public access the program(s).

CFR’s Federally Funded Programs

Program	Funding Source	Services	Direct Client Assistance	Frequency of Public Contact
Short-term Housing Program	DCA ESG Cobb ESG	Provides 30-day shelter and supportive services for homeless families	X	Daily
CoC Rapid Rehousing Program	HUD CoC	Provides permanent housing move-in costs and rental subsidy for homeless families for 3-6 months	X	Daily
ESG Homeless Prevention Program	Cobb ESG	Provides past due rent and rental subsidy for imminently homeless families for up to 3 months	X	Daily When funds are available
EFSP Rental Assistance Program	Cobb EFSP	Provides up to one month’s past due rent for families at-risk of homelessness	X	Daily When funds are available

Members of the general public (which includes LEP individuals) access CFR's federally-funded programs by:

- Telephone
- General Intake (walk-in)
- Email through CFR's Website (www.thecfr.org)

CFR will maintain a record of all LEP persons contacting the organization through the methods listed above. CFR will also measure the frequency of these contacts by persons speaking one of the five identified languages meeting HUD's Safe Harbor threshold criteria (1,000 persons or 5% of the total population). CFR will post a "Notice of Free Interpretation Services" poster at its front desk. CFR's staff will use "I Speak" cards to identify the languages spoken and maintain a record of all LEP persons contacting the organization by telephone or through General Intake (walk-in), or through the organization's website email. This information will be tabulated monthly and reported on the "Monthly Intake Report". This report will be maintained in the organization's secured records room.

CFR conducted an assessment for a period of 90 days to determine the frequency of contacts by language. Frequency of contact will be classified by daily contacts, frequent contacts (weekly) or infrequent or unpredictable contacts.

LEP individuals will receive direct language assistance commensurate with the frequency with which these individuals interact with the programs. This may include such interactions as completing applications, award notices, and public comment notices.

CFR's assessment determined that all LEP contacts are infrequent and unpredictable. Spanish-speaking persons were the most frequent, with six contacts during the 90 day assessment period. No contacts were received from persons speaking Chinese, Korean, Portuguese, or Vietnamese (other LEP populations exceeding 1,000 persons in Cobb County).

Factor 3: Nature and Importance of the Program, Activity, or Service Provided by Program(s)

The internal assessment will also determine that 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.

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.

While The Center for Family Resources will provide outreach regarding services available to LEP individuals across all program(s), CFR will prioritize vital document translation and subsequent LEP outreach based on the importance of the activity, information, service, or program, possible consequences of a lack of service to the LEP persons, the frequency with which they interact with the programs, and the resources of the organization.

Program	Direct Client Assistance	Significant Negative Impact If Services Delayed	Frequency of LEP Contact
Short-term Housing Program	X	Yes	Infrequent and Unpredictable
CoC Rapid Rehousing Program	X	Yes	Infrequent and Unpredictable
ESG Homeless Prevention Program	X	Yes	Infrequent and Unpredictable
EFSP Rental Assistance Program	X	Yes	Infrequent and Infrequent

Factor 4: Resources Available and Costs of Providing LEP Services

The Center for Family Resources takes all reasonable steps to ensure Meaningful Access for LEP persons to federally funded 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. CFR’s LAP balances the needs of the LEP community with the funding resources available.

CFR has identified those vital documents for each federally funded program it operates 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. CFR 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, CFR will also disseminate federally provided fair housing documents and brochures to clients, whenever applicable.

CFR’s Relevant Programs

Program	Vital Documents Necessary for Program Participation	Frequency of LEP Contact (TBD by 4-15-2018)	Languages to be Translated	Timeframe for Translation	Oral Translation Services Provided*	Timeframe for Service Availability
Short-term Housing Program and CoC Rapid Rehousing Program	a. Application Form b. CFR Consent Form c. HMIS Consent Form d. Homeless Verification Form e. Program Policies	<input type="checkbox"/> Daily <input type="checkbox"/> Frequent <input checked="" type="checkbox"/> Infrequent <input checked="" type="checkbox"/> Unpredictable	<input checked="" type="checkbox"/> Spanish <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Portuguese <input type="checkbox"/> Korean	180 days	<input checked="" type="checkbox"/> Spanish <input checked="" type="checkbox"/> Chinese <input checked="" type="checkbox"/> Vietnamese <input checked="" type="checkbox"/> Portuguese <input checked="" type="checkbox"/> Korean	90 days

ESG Homeless Prevention Program and EFSP Rental Assistance Program	a. Application b. CFR Consent Form c. HMIS Consent Form d. Program Policies e. At-risk Homeless Verification Form	<input type="checkbox"/> Daily <input type="checkbox"/> Frequent <input checked="" type="checkbox"/> Infrequent <input checked="" type="checkbox"/> Unpredictable	<input type="checkbox"/> Spanish <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Portuguese <input type="checkbox"/> Korean	180 days	<input checked="" type="checkbox"/> Spanish <input checked="" type="checkbox"/> Chinese <input checked="" type="checkbox"/> Vietnamese <input checked="" type="checkbox"/> Portuguese <input checked="" type="checkbox"/> Korean	90 days
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Based on the completion of CFR’s 90 day assessment period and the frequency of LEP contact, CFR has determined that the availability of resources and frequency of contact limit the provision of language services, as costs imposed substantially exceed the benefits. CFR will translate vital documents into Spanish only. Oral translation services will be provided for the other languages meeting threshold requirements (have LEP populations exceeding 1,000 persons).

Section 6: Staff as Resources

The Center for Family Resources has undertaken 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 recipient/sub-recipient-administered housing assistance and other programs.

CFR names its Chief Operating Officer for Programs as its LAP Coordinator. Broadly speaking, the LAP Coordinator will coordinate compliance with DCA’s and CFR’s respective LAPs. The LAP Coordinator is expected to:

- Communicate CFR staff’s responsibility to provide language access services to the local LEP population, including the dissemination of DCA’s and CFR’s LAP to staff
- Train staff involved in programs and activities on LEP requirements
- Keep records of assistance provided and actions taken
- Update the Four-Factor Analysis and LAP, as needed.

Should document translation or interpretation be necessary, The Center for Family Resources will use services such as:

- Language Line
- Phone Interpreter Services
- Staff and community volunteers to provide interpretation services for immediate LEP services.

Section 7: Language Assistance Measures

Provision of Language Access Services to LEP Individuals

All federally-funded CFR 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 to services.

Plan for Providing Language Access Services to Meeting Participants and Attendees

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

CFR will include a statement in its meeting notices indicating that 1) CFR 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 in which language(s) such services are required.

CFR's ability to provide an in-person interpreter upon request is limited by available resources and the scheduling availability of the translation service(s).

Plan for Translating Informational Materials Detailing Provided Services and Activities

CFR will ensure that all important documents—whether “vital” or relating to public engagement are translated into the relevant language (Spanish).

Those programs identified in the Four-Factor Analysis (in which LEP individuals may directly interact with CFR 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.

CFR 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

Any printed materials disseminated by CFR intended for public outreach will include a “language disclaimer” at the bottom of the document, stating that further information is available and that an interpreter is available upon request to attend the public hearings to provide interpretation services to attendees.

Staff Training Dates:

February 1, 2018

LEP Updated April, 2018

Update distributed to staff April 2018