

## **Columbus Consolidated Government Language Access Plan**

Grantee: Columbus Consolidated Government

CDBG Grant Number: CDBG 21cv-x-106-3-6240

Target Area: Consolidated Government-wide target area

### **Four Factor Analysis**

The analysis provided in this report has been developed to identify Limited English Proficiency (LEP) population that may benefit or be impacted by Community Development Block Grant funds and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in HUD’s 72FR 2732, the starting point for ensuring Meaningful Access is to conduct an individualized assessment that takes into account the following four factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a CDBG program, activity or service.
2. The frequency with which LEP persons come in contact with CDBG programs, activities or services.
3. The nature and importance of programs, activities or services provided by CDBG to the LEP population.
4. The resources available to execute the programs and overall costs to provide LEP assistance.

### **Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 181,558 residents who are 5 years or older in the CDBG service area 2,431 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize CDBG services. For the CDBG service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 97.6% speak English “very well”. 2.4% of groups who speak English “less than very well” were mainly Spanish. Since the threshold of 1000 people has been met, all vital documents will have written translations in Spanish.

DCA map and Census table (attachment) which lists the languages spoken at home by the ability to speak English for the population within the CDBG service area are attached to this plan.

**Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Consolidated Government 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.

The Consolidated Government is not pursuing a Housing project.

Frequency of Interaction: Annually

For CDBG-CV Projects:

- a. When notifying the public about the potential grant and activities
- b. When notifying the public about the grant award and activities
- c. When seeking qualified contractors
- d. When creating public hearings and notices related to the grant and activities

Census data indicates that the CDBG service area does meet the safe harbor Threshold of 5% or greater than 1000 individuals.

**Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the CDBG program**

The nature and importance of the CDBG program is to expand the regional food bank capacity so it can serve all food insecure people in the service area. Denial or delay of access to services or information would not cause serious or life threatening implications for LEP persons.

The Columbus Consolidated Governments' Director of Community Reinvestment, Robert Scott, is the individual responsible for coordination of the City's LEP compliance. Robert can be located at the City of Columbus Annex at 420 10<sup>th</sup> Street 31901, Columbus, GA between the hours of 9:00AM – 5:00PM, Monday through Friday. Robert can also be contacted by phone at 706-653-4000 by email at [scott.robert@columbusga.org](mailto:scott.robert@columbusga.org).

**Factor 4: The Resources Available to the Recipient and Costs**

The Columbus Consolidated Government takes all reasonable steps to ensure Meaningful Access for LEP person to CDBG programs and activities. The availability of resources, however, may limit provision of language services in some instances. Reasonable steps may cease to be reasonable when the costs imposed substantially exceed the benefits. The Columbus Consolidated Government CDBG LAP plan balances the needs of the LEP community with

funding resources available. Vital documents that directly face the LEP individuals and for which a delay in service provisions might significantly, negatively impact the wellness of any individual that the CDBG program serves will be identified and translated to the appropriate language if needed.

### **Training Plan for LEP Requirements**

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Consolidated Government of Columbus, the most important staff training is for the Community Reinvestment Department whom deals with the public regularly.

The following training will be provided to these Consolidated Government employees:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

### **Vital Documents**

Public notices, Fair Housing & Non-discrimination information, CDBG household surveys, and environmental notices.

### **Complaint Procedure**

Any person who believes he or she has been denied the benefits of this LAP or that the Columbus Consolidated Government 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 LAP Coordinator. Columbus Consolidated Government investigates complaints received no more than 180 days after the alleged incident. The Consolidated Government will process complaints that are complete.

Once the complaint is received, Columbus Consolidated Government will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Columbus has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Columbus may contact the complainant. The complainant has ten (10) business days from the date of contact to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, the complaint case can administratively closed. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public.

### **Monitoring and Updating the Plan**

The plan will be reviewed and updated every five years. Updates will consider the following:

- The four factor Analysis
- 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 financial resources are sufficient to fund language assistance resources needed

The Columbus Consolidated Government understands the value that its CDBG program plays in the lives of individuals who benefit from this program, and the importance of any measures undertaken to make the access to the program easier. The Consolidated Government is open to suggestions from all sources, regarding additional methods to improve their accessibility to LEP communities.

### **Title VI LEP compliance records plan**

The Columbus Consolidated Government will maintain documentation of compliance with Title VI of the Civil Rights Act of 1964, U.S.C. 2000(d) and Executive order 13166 regulations in the CDBG project files. These records will remain with the CDBG files for at least a period of three years after the official closing of the CDBG grant project.