

**Language Access Plan  
Whitfield County, Georgia**

**201 S Hamilton St., 5<sup>th</sup> Floor  
Dalton, GA 30720  
706-275-7500**

## I. GENERAL INFORMATION

Prepared By: Carol Roberts  
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Dalton, GA 30720  
706-275-7500  
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List of Current Applicable HUD Funded Grants/Programs (to be automatically amended as projects are funded):

1. Grantee: Whitfield County Board of Commissioners, Whitfield County Georgia  
CDBG-CV Grant Number: 21cv-y-155-1-6245  
Target Area: County-wide  
Whitfield County Census Table S1601  
LEP (2020 ACS)

This *Language Access Plan* has been prepared to address Whitfield County responsibilities as a recipient of Federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared to ensure compliance with Title VI of the Civil Rights Act of 1964, and its implementing regulations. Whitfield 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 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 Whitfield County.

Whitfield 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 Federal or State programs. 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, Whitfield County used a 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 Whitfield County programs, activities or services;
2. The frequency with which LEP persons come in contact with Whitfield County programs, activities or services;

3. The nature and importance of Whitfield County programs, activities or services provided by Whitfield County to the LEP population; and
4. The resources available to Whitfield County and overall cost to provide LEP assistance.

**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.**

Whitfield County reviewed the 2020 American Community Survey 5-year estimates (Table S16001: *Language Spoken at Home*) and determined that of the population of **97,331** persons over 5 years of age, **28,429** persons in Whitfield County (29.2% 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 Whitfield County**

Language Spoken	# of residents over 5 years of age (% of eligible population)		Speaks English less than “very well” (% of eligible population)	
English	68,902	70.8%	N/A	
Spanish	26,923	27.7%	12,646	47%
Other Indo-European	596	.6%	198	33.2%
Asian & Pacific	766	.8%	391	51%
Other	144	0.1%	132	91.7%

Based on this information, the threshold for written translation was exceeded in a single language, Spanish. Therefore, the recommended provision of written language assistance is "translated vital documents" as there are "more than 1,000 and more than 5% of the eligible population" are LEP Spanish speaking.

**2. The frequency with which LEP persons come in contact with Whitfield County programs, activities or services.**

For the CDBG-CV program, Whitfield County will engage with the public at these critical steps:

1. When notifying the public about a grant award application and its proposed activities. (One time)
2. When notifying the public about the grant award and its funded activities (One time)
3. When seeking qualified contractors
4. When notifying the public about the grant award closeout and its accomplishments (One time)

Frequency of Interaction: Steps 1, 2 and 4 require engagement with the public one time for each step. Step 3 will require engagement with the public once or possibly twice depending on the bid outcome.

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

The CDBG-CV project proposes the purchase and expansion of the Chattanooga Area Food Bank Northwest Georgia Warehouse. The County recognizes that we must prepare, respond to

and prevent COVID-19 and the increased food insecurity resulting from reduced household incomes and disrupted food supply chains due to the COVID-19 pandemic.

Importance of the Programs, Activities or Services: Denial or delay of access to services and information concerning the CDBG-CV Project will not have serious or life-threatening implications for the LEP individual.

#### **4. The resources available to Whitfield County, and overall cost to provide LEP assistance.**

Whitfield County has provided a list of vital documents that are translated and include all past, current and future public notices and past, current and future Fair Housing and Non-discrimination information. This program does not involve any type of CDBG household surveys. The project involves the acquisition and renovation of an existing facility that is located in an industrial area.

### **III. LANGUAGE ASSISTANCE**

The Name of the individual at Whitfield County responsible for coordination of LEP Compliance is:

Carol Roberts  
Whitfield County Board of Commissioners  
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Dalton, GA 30720  
706-275-7500  
[cjroberts@whitfieldcountyga.com](mailto:cjroberts@whitfieldcountyga.com)

### **TRAINING**

How Whitfield County may identify an LEP person who needs language assistance:  
All staff involved with Community Development activities will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year. Staff will attend any training that is provided by DCA to include the recipient's webinar to learn about LEP.

### **DISSEMINATION OF WHITFIELD COUNTY'S LAP PLAN**

The LAP Plan will be on the Whitfield County website page and provided to anyone requesting the information.

### **COMPLAINTS/FINDINGS**

Any person who believes they have been denied the benefits of this LAP or that the City of Homeland 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 County LAP Coordinator may be the first point of contact for any complaints or appeals, but the GA DCA LAP Coordinator must be informed of all complaints and appeals regarding GA DCA/HUD programs. The LAP Coordinator will provide oversight of the complaint/appeal resolution process. To file a complaint, submit the written complaint to:

Carol Roberts  
Whitfield County Board of Commissioners  
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Dalton, GA 30720  
706-275-7500  
[cjroberts@whitfieldcountyga.com](mailto:cjroberts@whitfieldcountyga.com)

Or for GA DCA/HUD funded programs:  
DCA 504 Coordinator  
60 Executive Park South, N.E.  
Atlanta, Georgia 30329-2231  
[fairhousing@dca.ga.gov](mailto:fairhousing@dca.ga.gov)

### **TRANSLATION OF DOCUMENTS**

Whitfield County 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. Translation resources have been identified.

The following list of Vital HUD/CDBG Documents will be translated into the Spanish language and made available:

Pre-award Public Notice – Prior to award

Post- Award Public Hearing Notice – within 60 days of award

Environmental Notices – As required

GA DCA/HUD Brochures and Posters – On permanent display or as required

Fair Housing Materials - On permanent display or as required

### **MONITORING AND UPDATING LAP PLAN**

Evaluation and revision process:

This language access plan shall be evaluated and revised, if needed, every five years using American Fact Finder for census information, or when it is clear that higher concentrations of LEP individuals are present in Whitfield County. 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 County's financial resources are sufficient to fund language assistance resources needed;

Determine whether the County 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.

### **RECORDS**

Whitfield County will maintain records in the County 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.