Office of General Counsel

MAN 2001 Access Plan for Constituents with Limited English Proficiency (LEP) and Sensory Impairments (SI)

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Manual 2001 Access Plan for Constituents with Limited English Proficiency (LEP) and Sensory Impairments (SI)

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Section I General Information

Scope

The Access Plan for Constituents with Limited English Proficiency (LEP) and with vision, hearing, or speech disabilities [sensory impairments (SI)] (the Access Plan) applies to all divisions and offices of the Department of Human Services (DHS or Department) for programs, services and activities provided by DHS, its local offices and its subrecipients unless otherwise noted.

Division of Family & Children Services (DFCS) employees are required to provide equally effective communication for constituents with disabilities in accordance with the DFCS ADA/Section 504 and Civil Rights policies and procedures found at: dfcs.georgia.gov/adasection-504-and-civil-rights.

Policy and Purpose

The policy of DHS is to provide meaningful access to constituents with LEP and equally effective communication for constituents with vision, hearing, or speech disabilities [SI] within all programs and activities conducted or supported by the Department. Please refer to Policy 2001: Limited English Proficiency and Sensory Impairment (LEP/SI) Program Policy ("Policy").

The purpose of the Access Plan is to demonstrate the department's commitment to ensuring that constituents with LEP and SI receive meaningful access and equally effective communication when engaging with all programs and activities within the department. The Access Plan will outline key information and procedures for staff to reference, helping to facilitate meaningful access and effective communication for these constituents.

Meaningful access generally refers to the provision of reasonable language assistance services that enables an LEP individual to have substantially equal participation in and access to the benefits of the Department's programs and activities. Language assistance services are meaningful when they are provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person.

Equally effective communication with constituents with SI occurs through the provision of appropriate auxiliary aids and services. The goal is to ensure that individuals with SI can communicate with, receive information from, and convey information to staff as effectively as individuals without disabilities when accessing the Department's programs and activities. The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person's normal method(s) of communication. This is accomplished on a case-by-case basis.

The Access Plan is in place to ensure LEP and/or SI constituents who need language assistance services (interpretation and translated materials) or auxiliary aids and services (e.g., sign language interpreters) receive qualified, competent, and timely services. The constituent contact points for communication assistance services include, but are not limited to:

- Program intake

- Assessments (eligibility, diagnostic)
- Service plan development
- Discharge planning
- Caseworker and care coordinator contacts
- Home visits
- Field contacts
- Telephone contacts
- Nutrition education classes
- Employment and training services
- Appointments with custodial and non-custodial parents
- Fair hearings and administrative procedures
- Court hearings involving child support
- Disaster/emergency response activities

The Policy and the Access Plan are consistent with Federal laws and guidance prohibiting discriminatory practices on the basis of race, color, national origin, and disability in programs and activities receiving Federal financial assistance. For SI compliance, the Policy and Access Plan are also consistent with Federal laws and guidance prohibiting discrimination on the basis of disability by state and local governments (public entities) and public accommodations.

The Access Plan consists of seven sections:

Section I includes the scope, policy, purpose, legal authority, and glossary of terms.

Section II addresses needs assessment to identify where language assistance services and auxiliary aids or services needed, as well as the structure to support meaningful access and equally effective communication.

Section III establishes the Department's procedures for taking reasonable steps to provide meaningful access for constituents with LEP and equally effective communication for constituents and companions with SI.

Section IV provides guidance on posting notices in all offices within the Department as well as on digital platforms.

Section V provides information regarding training for Department staff particularly those who are in a constituent facing role.

Section VI identifies the need for evaluation to continually improve upon serving constituents with LEP and SI.

Section VII contains all attachments referenced in the Access Plan.

Legal Authority

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000 et seq.; 28 C.F.R. §§ 42.101 et seq.; 45 C.F.R. § 80; and 7 C.F.R. §§ 15.1 et seq.:

Title VI prohibits recipients of Federal financial assistance from discriminating on the basis of race, color, or national origin. Title VI applies to intentional discrimination and policies, practices or procedures that have a disparate impact on the basis of race, color, or national origin. (Requiring information regarding citizenship or immigration status, and requests for social security numbers which are immaterial to eligibility determinations, may have an adverse effect on the basis of national origin).

Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 794 et seq.; 28 C.F.R. §§ 42.501 et seq.; 45 C.F.R. §§ 84.1 et seq. and 7 C.F.R. §§ 15b et seq.:

Section 504 protects "qualified" individuals from discrimination by Federally assisted programs based on disability. Under this law, a person with a disability is any person who (i) has a physical or mental impairment which substantially limits one or more major life activities, (ii) has a record of such an impairment, or (iii) is regarded as having such an impairment. Major life activities include functions such as caring for one's self, performing manual tasks walking, seeing, hearing, speaking, breathing, learning, and working. 28 C.F.R. §§ 42.540(k) et seq. 39.103.

Section 1557 of the Patient Protection and Affordable Care Act, 42 U.S.C. § 18116(a):

Section 1557 and its implementing regulation provide that an individual shall not be excluded from participation in, be denied the benefits of, or be subjected to discrimination on the grounds prohibited under Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d et seq. (race, color, national origin), Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681 et seq. (sex), the Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 et seq. (age), or Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 (disability), under any health program or activity, any part of which is receiving federal financial assistance; any program or activity administered by the Department under Title I of the Act; or any program or activity administered by any entity established under such Title. Section 1557 prohibits discrimination on the basis of race, color, national origin, age, disability, or sex (including pregnancy, sexual orientation, and gender identity), in covered health programs or activities.

Title II of the Americans with Disabilities Act of 1990, as amended, by the ADA Amendments Act of 2008, 42 U.S.C. §§ 12132 et seq.; 28 C.F.R. §§ 35.101 et seq.:

The ADA provides Federal civil rights protections to constituents with disabilities like those provided to constituents on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for constituents with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications.

Title II of the ADA prohibits discrimination on the basis of disability by public entities, such as state and local governments.

Title III of the ADA prohibits discrimination on the basis of disability by public accommodations.

A constituent is considered to have a "disability" if he or she has a physical or mental impairment

that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment. For example, persons with Human Immunodeficiency Virus (HIV) disease, both symptomatic and asymptomatic, may have a physical impairment that substantially limits one or more major life activities.

Under the ADA Amendments Act, major life activities include caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, writing, communicating, interacting with others, and working; and the operation of a ***major bodily function***, such as the functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive systems. The operation of a ***major bodily function*** includes the operation of an individual organ within a body system (28 C.F.R. §§ 35.108(c) et seq.).

Food and Nutrition Act of 2008, as amended, 7 U.S.C. §§ 2011 et seq.; 7 C.F.R. §§ 272.4(b) et seq. and 7 C.F.R. §§ 272.6 et seq.:

Section 11(c) of the Food and Nutrition Act provides nondiscrimination protections for Supplemental Nutrition Assistance Program (SNAP) households to the effect that no person in the United States shall, on the grounds of sex, race, color, age, political belief, religious creed, disability, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject of discrimination in SNAP.

Presidential Executive Order 14224 "Designating English as the Official Language of the United States":

Executive Order 14224 designates English as the official language of the United States and became effective March 1, 2025. The Order does not require or direct any changes to language services provided by DHS.

DHS remains committed to ensuring meaningful access to its programs and services for individuals with Limited English Proficiency (LEP) and will continue to provide language assistance as necessary to effectively serve all constituents.

Glossary of Terms

ADA

The Americans with Disabilities Act of 1990 (ADA), as amended by the ADA Amendments Act of 2008, prohibits discrimination on the basis of disability, in employment (Title I), by state and local governments (public entities) (Title II), and by places of public accommodation (Title III). See DOJ regulations at 28 C.F.R. 35 (Title II) and 28 C.F.R. 36 (Title III).

Auxiliary Aids and Services

Auxiliary aids and services include, but are not limited to: qualified sign language interpreters, telephone handset amplifiers, assistive listening devices, closed caption decoders, real time captioning, TTY/TTD relay services for deaf and hard-of-hearing, screen reader software, Braille embossers, text to Braille converter, large print materials, alternative keyboards for individual who are blind and have low vision.

Bilingual employee

An employee who has demonstrated proficiency in speaking English and one other language.

Braille

A system of touch reading for the blind, which employs embossed dots evenly arranged in quadrangular letter spaces or cells.

Companion (ADA)

A family member, friend, or associate of a constituent seeking access to a service, program, or activity of a public entity, who, along with such individual, is an appropriate person with whom the public entity should communicate.

Constituents

All persons seeking or receiving assistance or services from DHS.

Covered Entities

Covered entities include institutions, programs, and service providers receiving federal financial assistance from federal agencies such as the U.S. Department of Health and Human Services and U.S. Department of Agriculture, public entities (i.e. state and local government human service agencies), and public accommodations that administer or deliver DHS programs, activities and services.

Direct "In-Language" Communication

Monolingual communication in a language other than English between a multilingual staff and a constituent with LEP (e.g., Russian to Russian).

Disability

A physical or mental impairment that substantially limits one or more of the major life activities of such individual, a record of such an impairment, or being regarded as having such an impairment (28 C.F.R. 35.108 and 28 C.F.R. 36.105).

Federal Financial Assistance

Federal financial assistance means assistance that non-Federal entities receive or administer in the form of grants, contracts, loans, loan guarantees, property, cooperative agreements, food commodities, direct appropriations, or other assistance, but does not include a tax credit, deduction, or exemption.

Interpretation

The act of listening to communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. Interpreting is the process of understanding and analyzing a spoken or signed message and re-expressing that message effectively, accurately, and impartially in another language, using any necessary specialized vocabulary, taking the social and cultural context into account.

Language

Refers to the method by which a constituent communicates with another through speech, written communication or gestures and includes languages other than English.

Language Assistance Services

Oral and written language services needed to assist constituents with LEP to communicate effectively with staff, to provide constituents with LEP with meaningful access, and an equal opportunity to participate fully in, the services, activities, or other programs administered by DHS.

Limited English Proficient (LEP)

A constituent who does not speak English as their primary language and has a limited ability to read, speak, write, or understand English. For example, a constituent with LEP may be competent in English for certain types of communication (e.g., speaking or understanding), but is still considered LEP for other purposes (e.g., reading or writing).

Meaningful Access

Meaningful access to programs and services is the standard of access required of federally funded entities to comply with language access requirements of Title VI of the Civil Rights Act of 1964. Meaningful access is accomplished by providing constituents with LEP with reasonable, timely, appropriate, accurate and effective language assistance services (qualified, competent interpreters and translated materials) at no charge when accessing DHS' programs and activities. Language assistance services are meaningful when they are provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the constituent with LEP.

Multilingual employee

An employee who has demonstrated proficiency in speaking English and at least two other languages.

Mystery Shopper

A contractor selected by DHS whose staff visits offices posing as a constituent with LEP who is seeking access to programs and services for the purpose of collecting information to assess compliance for civil right provisions.

Public accommodation

A government-owned organization, facility,or business that provides services to the public; or a private entity that owns, leases (or leases to), or operates a place of public accommodation. Private entities that own, operate, lease, or lease to a place of public accommodation, such as a private hospital, doctor's office, pharmacy, place of lodging, retail store, library, private school, or day care center.

Public entity

(1) Any State or local government; (2) Any department, agency, special purpose district, or other instrumentality of a State or States or local government.

Qualified Interpreter (for Disability)

An interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Qualified interpreters include, for example, sign language interpreters, oral transliterators, and cued-language transliterators.

Qualified Interpreter (for LEP)

A qualified interpreter is a highly trained individual who mediates spoken communication between people speaking different languages without adding, omitting, or distorting meaning or editorializing. A qualified interpreter is competent to provide interpretation services at a level of fluency, comprehension, impartiality, and confidentiality appropriate to the specific nature, type, and purpose of the information at issue. Bilingual/Multilingual staff who serve as interpreters should also be competent in the skill of interpreting.

Qualified Reader (for Disability)

A person who is able to read effectively, accurately, and impartially using any necessary specialized vocabulary.

Qualified Translator (for LEP)

A highly trained individual who is able to render text from a source language into a target language while preserving meaning and adhering to generally accepted translator ethics and principles, including confidentiality.

Reasonable Steps

The steps necessary to ensure meaningful access for constituent with LEP based on a self-assessment of four factors: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered within the area serviced by the recipient; (2) The frequency with which LEP persons come in contact with the program or activity; (3)The nature and importance of the program, activity, or service to people's lives; and (4) The resources available to the recipient and costs. The level of resources and the costs may have an impact on the type of language assistance provided. Smaller agencies with more limited budgets are not expected to provide the same level of language services as larger agencies with larger budgets. In addition, "reasonable costs" may become "unreasonable" where the costs substantially exceed the benefits. DHS and its subrecipients must take reasonable steps to ensure meaningful access to DHS programs and activities. Providing no assistance may result in discrimination on the basis of national origin violation of Title VI. See (DOJ) 28 C.F.R. 42; (USDA) 7 C.F.R. 15; and (HHS) 45 C.F.R. 80.

Section 504

Section 504 of the Rehabilitation Act of 1973, as amended, (29 U.S.C. § 794) prohibits discrimination on the basis of disability by recipients of federal financial assistance. See (DOJ) 28 C.F.R. Part 42; (USDA) 7 C.F.R. 15b; and (HHS) 45 C.F.R. Part 84.

Sensory Impaired (SI)

Refers to constituents who have disabilities vision, hearing, or speech disabilities, such as deaf, deafened, hard of hearing, blind, low vision, or deaf/blind, and/or speech impairments.

Telecommunications Relay Service

Staff must receive and respond to calls made by persons with hearing or speech disabilities through the free nationwide telecommunications relay services (TRS), which can be reached by calling 7-1-1. Staff must respond to telephone calls from a TRS in the same manner that it responds to other telephone calls. Staff must be trained on how to receive all forms of TRS, including Text-to-Voice TTY-based TRS, Voice Carry Over, Hearing Carry Over, Speech-to-Speech Relay Service, Shared Non-English Language Relay Services, Captioned Telephone Service, IP Captioned Telephone Service, Internet Protocol Relay Service, and Video Relay Service (VRS).

TDD/TTY

Telecommunications Device for the Deaf or Teletypewriter is a device which allows conversation to take place over the telephone by sending typed messages through phone lines to the TDD/TTY screen.

Title VI

Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d et seq.) prohibits discrimination on the basis of race, color, national origin by recipients of federal financial assistance. See (DOJ) 28 C.F.R. § 42; (USDA) 7 C.F.R. § 15; and (HHS) 45 C.F.R. § 80).

Translation (Written)

The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

Translation (Sight)

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.

Transliterator

A person who represents letters or words in the corresponding characters of another alphabet. The term is commonly used to designate a person who transcribes written documents into Braille (American Heritage Dictionary). A qualified speech-to-speech transliterator is a person trained to recognize unclear speech and repeat it clearly.

Video Relay Service (VRS)

A free, subscriber-based service for constituents who use sign language and have videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying.

Video Remote Interpreting (VRI)

A fee-based interpreting service that uses video conference technology to access an off-site interpreter to provide real-time sign language or oral interpreting services for conversations between hearing constituents and constituents who are deaf or have hearing loss over dedicated lines or wireless technology offering high-speed, wide-bandwidth video connection that delivers high-quality video images. If VRI is chosen, all the regulatory performance standards must be met. See 28 C.F.R. 35.160(d)(1-4).

Vital Document

Paper or electronic written information and material that contains information that is critical for accessing a component's program or activities or is required by law. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program or activity, information, encounter, service, or benefit involved, and the consequence to the constituent with LEP if the information in question is not provided accurately or in a timely manner.

Section II Needs Assessment

Organizational Commitment

The responsibility for implementing DHS policies and procedures to ensure meaningful access for constituents with limited English proficiency and equal access for individuals with sensory impairments is shared collectively. This is achieved through the collaborative efforts of the LEP/SI Program and the various DHS divisions and offices that provide services to constituents with LEP and SI.

Each division that provides social services to constituents implements the Access Plan to ensure service delivery at the local level. Local level will be defined by Divisions based on programmatic operations.

Representatives from the DHS divisions assist with the implementation of the DHS LEP/SI policy by serving on the DHS Language Access Team (LAT), Complaint Resolution Team (CRT), and as Language Access Coordinators (LAC). An ad hoc Community Advisory Council (CAC) comprised of representatives from major ethnic and language groups, including the hearing and visually impaired, is convened as needed to respond to DHS LEP/SI issues/concerns at the local level. The CAC provides feedback and recommends improvements to LEP/SI service delivery focusing on constituent and community perspectives.

LEP/SI Program

The DHS LEP/SI Program Manager serves as the primary point of contact for implementing the DHS LEP/SI policy as well as the point of contact for state-level and federal-level compliance reviews. Also, the DHS LEP/SI Program Manager responds to compliance issues and prepares reports to the various offices within DHS or to federal agencies as needed.

The DHS LEP/SI Program has the following specific responsibilities:

- Maintaining the DHS LEP/SI policy and procedures and keeping them current and relevant;
- Convening, supporting, and maintaining up-to-date contact information for the teams that assist with LEP/SI Program implementation, specifically:
    - **Language Access Team (LAT)** which consists of state level representatives from all divisions,
    - **Complaint Resolution Team (CRT)** which is an ad hoc team of the Language Access Team whose role is to assist in the investigation of allegations of discrimination based on LEP or SI, and
    - **Language Access Coordinators (LAC)** who serve as the focal point for LEP/SI at the local or regional level for each division.
- Developing and providing roles and responsibility training for LAT and CRT;
- Overseeing, along with programs, the translation and printing of vital forms and documents into languages most often and significantly encountered in the state;
- Managing feedback regarding contracts for telephone interpreting services, sign language inter-

preter services, language testing services, interpreter/interpretation services, translator/translation services, and other statewide contracts that provide language access services to constituents with LEP/SI;

- Managing and maintaining the information provided by the county, regional, and state program offices;
- Receiving, reviewing, and investigating appropriate complaints of discrimination based on disability (except DFCS disability complaints which will be handled by the DFCS Civil Rights and ADA/Section 504 Coordinator) or national origin as they relate to language assistance. Note: The DHS LEP/SI Program will process discrimination complaints based on national origin filed against any USDA FNS program or activity in accordance with any federal statute regarding civil rights; and
- Maintaining adequate language assistance resources (i.e. securing contractors to provide interpreter and translation services, testing) and assisting program divisions and offices with language assistance in serving constituents with LEP/SI.
- Monitoring implementation of the Policy, Access Plan and the Mystery Shopper program.

Language Access Team (LAT)

The LAT consists of at least one state-level representative from each DHS division and office and is responsible for:

- Providing input into the design and implementation of products and services for constituents with LEP/SI from the perspective of each division and office represented;
- Serving as the state level single point of contact for their program/office and respective county level single point of contacts (CLSC);
- Keeping the DHS LEP/SI program informed of the status of LEP/SI services within each area;
- Ensuring the completion and review of communication assistance self-assessment processes; and
- Aiding with the implementation of the Access Plan, if needed.

Language Access Coordinators (LAC)

The LAC is designated by the regional director for each office for the Division of Child Support Services (DCSS). There are no Language Access Coordinators for DAS or DFCS. All LEP/SI related inquiries will be directed to the DAS or DFCS Language Access Team Member, respectively. Each of the LACs will report to their respective LAT member. The LAT member for DAS and DFCS will represent the interests for the state and local levels. The LAC:

- Serves as single point of contact for each county, district or region on all issues dealing with services to constituents with LEP/SI;
- Ensures that the Access Plan is implemented, based on the LEP/SI policy and procedures as well as the language needs of the service area;
- Secures and/or assists divisions/offices in securing language resources (interpreters, translated documents, etc.);

- Ensures that the Notice of Free Interpretation Services Poster is visible and that "I SPEAK" cards are accessible;
- Provides oversight and monitoring to the provision of oral and written language services to constituents; and
- Assesses staff training and conducts or coordinates training to ensure that staff is prepared to provide meaningful language access to constituents with LEP and equal access to constituents with SI.

DHS's subrecipients should contact the LEP/SI Program Manager with questions regarding the provision of language assistance services. Gateway Community Partners should contact the Gateway Community Partner Program Manager or LEP/SI Program Manager for assistance.

Complaint Resolution Team (CRT) Responsibilities

The CRT is an ad hoc group of the Language Access Team (LAT) whose role is to assist in the investigation of allegations of discrimination based on national origin or disability received by DHS or its divisions and offices, with exception. The DFCS Civil Rights and ADA/Section 504 Coordinator investigates complaints alleging disability discrimination. The CRT may also respond to inquiries made by the U.S. Department of Agriculture (USDA), Food and Nutrition Administration, Civil Rights Division, or the U.S. Department of Health and Human Services (HHS), Office of Civil Rights, regarding complaints received against DHS that allege national origin or disability discrimination.

The CRT consists of LEP/SI staff, the Language Access Team (LAT) member from the affected division and may include any related Language Access Coordinators. The CRT will work together to investigate and respond to the complaint. Complaints will be responded to within five business days.

> **NOTE** Complaints involving USDA Food and Nutrition programs must be handled in accordance with any federal statute regarding civil rights.

Self Assessment of Need for Language Access and SI Access

For language access, DHS, its local offices, and subrecipients must conduct routine assessments of need every five years considering at least the following four factors:

a. The number or proportion of constituents with LEP eligible to be served or likely to be encountered within the area serviced by DHS, its local offices and subrecipients.
b. The frequency with which constituents with LEP come in contact with the program, benefit, service, or activity.
c. The nature and importance of the program, benefit, service, or activity to the constituent with LEP. The more important the program, or the greater the possible consequences of the contact to the constituents with LEP, the more likely language services are needed.
d. The resources that are available and the costs of providing the language assistance service(s).

DHS, its local offices, and subrecipients will apply the four factors to the various kinds of contact that its offices will have with the public to assess language needs and will decide what reasonable steps it should take to ensure meaningful access for constituents with LEP.

Please see Attachment 1 for the DHS Language Access Self-Assessment of Need Survey for a copy of the survey. However, the survey will be conducted through the DHS online form located in the DHS LEP/SI SharePoint site which can be found at: forms.office.com/g/wMC9gZwPwk.

For SI access, DHS, its local offices, and subrecipients must conduct routine self-evaluation of need at least every five years considering, at a minimum, the following factors - see the ADA Tool Kit: Chapter 3, Addendum Checklist.

Demographic Data

In conjunction with the self-assessment of need, demographic data of constituents with LEP and SI for the state of Georgia will be produced by DHS at least every 5 years based on U.S. Census data, at minimum, to determine language access needs throughout the state for constituents with LEP and disability access needs for constituents with SI. Other programs and offices may supply other data to ensure meaningful access to services for constituents with LEP and equally effective communication for constituents with SI. Data from the Decennial Census and/or the American Community Survey will be provided identifying LEP groups by language, population, and county. Please see Attachment 2 for data related to LEP and SI constituents in the state of Georgia.

Section III Language Access and Equally Effective Communication Services

Intake Procedures / Identification of Need

DHS, its local agencies, and subrecipients must provide language assistance services and auxiliary aids and services at no cost to all constituents with LEP and/or SI, respectively, who are applying for or receiving services and benefits through its offices. The constituent's primary language, method of communicating and special needs should be identified at all constituent contact points. Offices are to use qualified bilingual/ multilingual staff when available, the DHS "I Speak" flash card (see Attachment 3), or the appropriate qualified language interpretation vendors to identify the language assistance needs of constituents with LEP. (DHS staff refer to Attachment 6 for state-contracted vendors.) Identification also can be accomplished in one of the following ways:

- Self-identification by the non-English speaker, constituents with LEP or their companion.
- Reviewing records of past Department interactions with the individual to determine whether an interpreter or translation was used.
- Asking open-ended questions to determine whether the individual understands or can accurately respond in English or whether they need an auxiliary aid or service.
- Asking the individual if he or she can speak the English language and his or her primary language or preferred method of communication.

> **NOTE** Constituents who are LEP may be competent in English for certain purposes (e.g., speaking), but still be LEP for certain types of communication (e.g., reading, writing, or discussing medical, legal, or other complicated or highly specialized topics).

Staff are to respond affirmatively to constituents with LEP who request language assistance services and constituents with SI who request auxiliary aids or services or offer these services in advance if staff identifies a communication issue during the intake process.

For DFCS – When using Georgia Gateway: When using the worker portal within Georgia Gateway, DFCS staff have the option to select the preferred language of the constituent within the section "Demographic Information." Staff may select one of the languages listed in the drop-down menu. Please note if "Other" is selected as a language, please specify the language in the space provided under "If other, specify". If language is not known, it may be necessary for staff to identify the language before proceeding with the case to ensure appropriate language assistance is provided to the constituent with LEP.

For a quick guide to provide meaningful access to constituents with LEP and equally effective communication to constituents with SI, please refer to:

- **For non-DFCS**: DAS and DCSS Guide for Providing Meaningful Access and Effective Communication to LEP/SI Constituents

- **For DFCS**: DFCS Guide for Providing Meaningful Access to LEP Constituents

Communication Assistance Resources

DHS, its local agencies, and subrecipients must take reasonable steps to ensure that an interpreter is present either by telephone or in person at all points of service delivery. Language assistance services for constituents with LEP and auxiliary aids and services for constituents who are SI are offered at no cost by DHS and must be provided once the need for assistance has been identified. Language assistance services include qualified oral interpreters for languages other than English and written translations in other languages. Auxiliary aids and services include, but are not limited to, American and other sign language interpreters, materials in Braille and large print, and assistive listening devices.

DHS, its divisions, and offices will use the guidelines set forth in this section to utilize and evaluate state contracted language assistance services vendors and non-contracted vendors, when necessary. In all situations, DHS, its local agencies, and subrecipients will provide competent interpreters, translation, and other communication assistance in a timely manner and at no cost to DHS constituents. If language assistance services and auxiliary aids and services are not secured, staff must document all attempts made to obtain an interpreter or provide the requested auxiliary aid or service for the constituent with LEP/SI.

For a list of state contracted vendors, please see Attachment 6.

The DAS & DCSS LEP/SI Service Delivery Checklist is distributed and utilized by offices to provide meaningful access to constituents with LEP and equal opportunity for constituents with SI. Please see **Attachment 7 for the DAS & DCSS LEP/SI Service Delivery Checklist**.

For DFCS employees, please see Attachment 8 for the DFCS LEP Service Delivery Checklist.

Providing Language Assistance for Constituents with LEP

Interpretation Services

Three primary resources are available to provide qualified, competent interpretation services. They are:

- Qualified telephone interpretation services
- Professional, qualified on-site, in-person interpreters
- Video Remote Interpretation (VRI)

DHS, its local offices, and subrecipients must provide qualified, competent interpreters when communicating with constituents who are LEP. A qualified interpreter is a highly trained individual who interprets spoken communication between people speaking different languages without adding, omitting, distorting meaning, or editorializing. A qualified interpreter is competent to provide interpretation services at a level of fluency, comprehension, impartiality, and confidentiality appropriate to the specific nature, type, and purpose of the information at issue.

Qualified, competent interpreters are used in the following situations when communicating in the

following situations with constituents with LEP. This list is not an exhaustive list:

- When requested by a constituent
- When requested by a service provider for a constituent with LEP and/or SI
- When necessary to establish or maintain a constituent's eligibility for DHS programs or services
- When interpreter services are necessary to access public meetings sponsored by DHS or those under contract with DHS
- When necessary for the constituent to access any service funded directly or indirectly by DHS

> **NOTE** Vendor login credentials, including PINS, are issued specifically for individual office locations and are intended solely for use by the assigned office. These credentials must not be shared or transferred between offices. In the event an employee relocates to another office, their previous office's PIN and associated login credentials do not accompany them.

For tips on using interpreters, **please see Attachment 9 Tips for Using Interpreters to Improve Service Delivery**.

Use of DHS Bilingual/Multilingual Staff

Interpreter competency requires more than self-identification as bilingual/multilingual. Bilingual/multilingual staff and community volunteers who interpret for DHS may be able to communicate effectively with a constituent with LEP directly in a language other than English but not be competent to interpret between their native language and English. Thus, DHS bilingual/multilingual staff are prohibited from interpreting between two parties (i.e. constituents with LEP and English-speaking person). If interpretation is needed for a constituent who does not speak English, a state contracted vendor for interpretation must be used.

However, DHS staff that speak a language other than English may qualify as a bilingual/multilingual employee by taking and passing a language proficiency test offered by the contracted language testing vendor. Please see Policy 2002: Bilingual/Multilingual Temporary Salary Supplement (TSS) Testing Policy.

DHS staff that qualify as bilingual/multilingual employees and receive the Bilingual/Multilingual TSS may communicate directly with the constituents with LEP in his/her native language to provide meaningful access to services and programs offered by DHS.

> **NOTE** Successful completion of the DHS language proficiency assessment does not authorize or qualify staff to translate written documents. All documents requiring translation must be submitted through the DHS approved translation process.

Use of Family or Friends as Interpreters

DHS, its local offices, and subrecipients cannot require a constituent to bring someone to interpret for him or her and cannot require the constituent to use the free interpretation services. However,

a companion may interpret for a constituent with LEP in only two situations:

a. In an emergency involving an imminent threat to the safety or welfare of a constituent or the public, an adult or minor child accompanying a person may be relied upon to interpret or facilitate communication only when a qualified interpreter is not available.
b. In situations not involving an imminent threat, an accompanying adult who is able to interpret may be relied upon to interpret or facilitate communication when a) the constituent requests this, b) the accompanying adult agrees, and c) reliance on the accompanying adult is appropriate under the circumstances. This exception does not apply to minor children.

Even under exception (b), staff must not rely on an accompanying adult to interpret when there is reason to doubt the person's impartiality or effectiveness.

DHS, its local offices, and subrecipients are discouraged to use family or friends as interpreters. However, if a constituent with LEP desires to use family or a friend as an interpreter based on the above conditions, they must do so at their own expense and only after staff remind the constituent that a qualified interpreter is available free of charge. DHS does not allow minor (under the age of 18) children to serve as interpreters.

When a constituent decides to use his/her own interpreter and declines the DHS provided interpreter at no cost, staff must utilize either an on-site or telephone interpreter to observe communication or to listen in, respectively, to ensure accurate interpretation from the constituent's own interpreter. If issues of competency, confidentiality or conflict occur on the part of the constituent provided interpreter, staff must secure a qualified interpreter to assume interpretation responsibilities, even if a constituent with LEP wants to use his or her own interpreter.

Translation of Vital Documents and Information

Vital documents and information on websites and online systems (i.e. online applications), must be translated either in writing or orally into languages needed by constituents. A vital document is paper or electronic written material that contains information that is critical for accessing DHS' programs or activities or is required by law. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program or activity, information, encounter, service, or benefit involved, and the consequence to the constituent with LEP if the information in question is not provided accurately or in a timely manner.

DHS, its local offices, and subrecipients must translate vital information using qualified, competent translators. A qualified, competent translator is a highly trained individual who is able to render text from a source language into a target language while preserving meaning and adhering to generally accepted translator ethics and principles, including confidentiality. For DHS and its local offices, when translation of vital documents is needed, each division will appoint a translation designee to make a request to a state contracted vendor for translations with supervisory approval and submit documents for translation.

Copies of documents in languages other than English must be available to the public. These are generally documents, forms, and brochures such as applications, consent forms, letters containing information regarding participation in a program, notices pertaining to the reduction, denial, or termination of services or benefits, and notices advising constituents with LEP and/or SI of the availability of free language assistance.

To request translation of a document, DHS staff must contact their divisional translation designee. Please see *https://pamms.dhs.ga.gov/ogc/lepsi-2001-manual/_attachments/attachment-10-dcss-and-das-translation-request-procedure.pdf[Attachment 10 for DCSS and DAS Translation Request Procedure] and *https://pamms.dhs.ga.gov/ogc/lepsi-2001-manual/_attachments/attachment-11-dfcs-translation-request-procedure.pdf[Attachment 11 DFCS Translation Request Procedure]

Notice to constituents regarding free translation services of vital documents is located on the Notice of Free Interpretation Services poster. Please see Attachment 15. This poster must be displayed in a prominent location within all DHS office lobbies and on applicable DHS/DFCS webpages. DHS's sub-recipients must also post notice of the availability of free language assistance services and auxiliary aids and services in a language and format that constituents can understand.

Interpretation Services Provided Over-The-Phone

When providing services over the phone to constituents with LEP, DHS and its local offices must offer and provide an interpreter. This can be done through an immediate callback with the interpreter on the line or by initiating a three-way call with an interpreter. If calling the constituent with LEP, an over-the-phone interpreter must be on the line prior to contacting the constituent. Once the constituent's contact number is provided, the interpreter will establish the three-way call. Please see Attachment 6- DHS Interpretation Translation Service Vendors for over-the-phone interpretation vendor information.

When a constituent with LEP leaves a voicemail message in their native language, staff will need to utilize the over-the-phone interpretation vendor to interpret the voicemail message received or request the voicemail to be translated.

Providing Equally Effective Communication for Constituents and Companions With SI

(For DFCS, please refer to POL 3601 – ADA and Section 504 of the Rehabilitation Act Policy for matters concerning ADA/SI.)

Effective Communication Rule: DHS, its local offices, and subrecipients providing DHS services must ensure that communication with constituents with SI is equally effective as communication with constituents without SI. This applies to communications with applicants, participants and with their parent, spouse or companions in appropriate circumstances who have hearing, vision, and speech disabilities. A "companion" is a family member, friend, or associate of an individual seeking access to a service, program, or activity of a public entity, who, along with such individual, is an appropriate person with whom the public entity should communicate.

Primary Consideration Rule: Staff within DHS, its local offices, and state or local government agencies (public entities) with which it contracts are required to give primary consideration to the type of auxiliary aid or service requested by the constituents with SI. Staff must honor that choice, unless they can demonstrate that another equally effective means of communication is available or that the aid or service requested would fundamentally alter the nature of the program, service, or activity or would result in undue financial and administrative burdens. If the choice expressed by the constituent with SI would result in an undue burden or a fundamental alteration, DHS and its local offices still have an obligation to provide another aid or service that provides effective communication, if possible, that would not result in an undue burden.

The decision that a particular aid or service would result in an undue burden must be made by a member of DHS leadership, a department head at minimum, and must include a written statement of the reasons for reaching that conclusion.

Staff within DHS's nongovernmental subrecipient agencies and public accommodations with which DHS contracts should consult with the constituent with SI whenever possible to discuss what auxiliary aid or service is appropriate. These subrecipients and Gateway community partners must provide an aid or service that will be effective, given the nature of what is being communicated and the constituent's method of communicating, unless doing so would result in an undue burden. In which case, the subrecipient and the public accommodation must provide another effective aid or service, if possible, that would not result in an undue burden. DHS, its office agencies, subrecipients and public accommodations must:

a. Notify constituents with SI about the availability of reasonable modifications and auxiliary aids and services and how to request them in a format that they can understand.
b. Provide auxiliary aids and services when needed to communicate effectively with constituents with SI at no cost to them unless doing so would result in a fundamental alteration.
c. Take into consideration the nature, length, and complexity of the communication, as well as the constituent's normal method(s) of communication when choosing an auxiliary aid or service.
d. Use qualified interpreters and not require a constituent with SI to bring another individual with them to interpret e.g., sign language interpreters.
e. Limit the use of adult or minor child as interpreters to emergency situations involving an imminent threat to the safety of welfare of a constituent or the public when a qualified interpreter is not available.
f. Only use an accompanying adult as an interpreter when a constituent requests this, the accompanying adult agrees to interpret, and reliance on the accompanying adult is appropriate under the circumstances.
g. Require reasonable advance notice from constituents requesting aid or services, based on the length of time needed to acquire the aid or service but may not impose excessive advance notice requirements.
h. Honor "walk-in" requests for aids and services to the extent possible.
i. Ensure Video Remote Interpreting (VRI) technologies meet ADA performance standards (28 C.F.R. § 35 and 28 C.F.R. § 36.303(f).
j. Accept telephone calls placed through Telephone Relay Service (TRS) and Video Relay Service (VRS), and staff who answer the telephone must treat relay calls just like other calls.
k. Train frontline staff on the requirements for communicating effectively with constituents with SI.

DHS, its local offices, and subrecipients cannot require a constituents to bring someone to interpret for him or her. However, if a constituent with SI chooses to rely on an accompanying adult to interpret for them, staff can rely on the accompanying adult to interpret in only two situations:

a. In an emergency involving an imminent threat to the safety or welfare of a constituent or the public, an adult or minor child accompanying a person who uses sign language may be relied upon to interpret or facilitate communication only when a qualified interpreter is not available.

b. In situations not involving an imminent threat, an adult accompanying someone who uses sign language may be relied upon to interpret or facilitate communication when a) the constituent requests this, b) the accompanying adult agrees, and c) reliance on the accompanying adult is appropriate under the circumstances. This exception does not apply to minor children.

Even under exception (b), staff must not rely on an accompanying adult to interpret when there is reason to doubt the person's impartiality or effectiveness.

Communication with the deaf or hard of hearing is generally through sign language, video recording transmitter, a Teletypewriter (TTY) or a Telecommunications Device for the Deaf (TDD). Use of TTY/TDD services may be accessed through the Georgia Relay Service, 24 hours a day, 7 days a week by dialing: 711 or 1-800-255-0135 (for hearing callers) or 1- 800-255-0056 (for text telephones).

See Attachment 12 for a description of how to use the GA Relay Service, which is available for incoming and outgoing calls.

Communication with the visually impaired is generally through voice, Braille, large print, email (if they have accessibility software and screen-read devices), storage media, and other computer accessories.

See Attachment 9 for tips for using an interpreter to improve service delivery and suggested guidelines for sign language interpreters.

Auxiliary aids and services include, but are not limited to the following:

- Qualified interpreters on-site or through video remote interpreting (VRI) services
- Note takers
- Real-time computer-aided transcription services
- Written materials
- Exchange of written notes
- Telephone handset amplifiers
- Assistive listening device and/or systems
- Telephones compatible with hearing aids
- Closed caption decoders
- Open and closed captioning, including real-time captioning
- Voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices
- Videotext displays
- Accessible electronic and information technology
- Or other effective methods of making aurally delivered information available to constituents who are deaf or hard of hearing

When DHS, its local offices, subrecipients or public accommodations use an automated-attendant system, including, but not limited to, voicemail and messaging, or an interactive voice response sys-

tem, for receiving and directing incoming telephone calls, that system must provide effective real-time communication with constituents using auxiliary aids and services, including TTYs and all forms of FCC-approved telecommunications relay systems, including Internet-based relay systems. Reference 28 C.F.R. § 35.161 and the Federal Communications Relay Service Consumer Guide: Telecommunications Relay Service.

Procurement / Contracting / Complaints for Communication Resources

Procurement and contracting of language access vendors is administered by the Department of Administrative Services (DOAS). While DHS may be involved in the procurement process for statewide contracts, DOAS will make the final decision of securing contracts with vendors. DHS will work to ensure that the standards and qualifications of interpreters and translators are met when procuring vendors for this purpose. If DHS establishes an agreement with vendors outside of statewide contracts, DHS will apply the standards and qualification for interpreters and translators. **Please see Attachment 13 for standards and qualifications that will be used to secure contracts/service agreements with language access vendors**.

If a language access/SI vendor fails to properly and/or adequately provide language assistance services or auxiliary aids and services to DHS staff for communication with constituents, DHS staff may file a complaint against the vendor either by submitting the Language Access/SI Vendor Feedback Form or contacting DOAS directly. For instructions on how to file a complaint against a vendor, please see **Attachment 14: DHS Language Access/SI Vendor Feedback Form and Instructions**.

Section IV Notices

Providing Effective Notice to Constituents with LEP and SI

DHS, its local offices, and subrecipients must notify constituents with LEP about the availability of free communication assistance and how to request it in a language that they can understand. Likewise, constituents must be notified of the availability of auxiliary aids and services and how to request reasonable modifications and auxiliary aids and services for constituents with disabilities in a format they can understand.

For example, a Notice of Free Interpretation Services (see Attachment 15) is posted in DHS local office waiting rooms and/or reception areas. This poster informs the public of DHS' LEP/SI policy to provide free interpretation services (in the major languages spoken in Georgia, including sign language and Braille). Wall posters are available through the DHS LEP/SI Office. Bilingual notices should appear on webpages and online automated systems used for DHS programs and activities. Bilingual notices also may be provided through program brochures, program-related education videos, booklets, local newspapers (including non-English newspapers), job fair leaflets, radio/television announcements, and other forms of outreach. Regardless of the form of public notice used, notice of availability of free language assistance services must be given in the appropriate language(s).

Additional notices informing constituents with disabilities about the availability of free auxiliary aids and services and reasonable modifications must be posted in a prominent area where DHS programs and activities are provided. These notices can be provided in a language and format that constituents with disabilities can understand. DHS, its local offices, and subrecipients must ensure that interested constituents, including those with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.

Please refer to **Attachment 7: DAS and DCSS Limited English Proficiency / Sensory Impairment (LEP/SI) Service Delivery Checklist for a list of required notices to be posted in all DHS offices**.

For DFCS, please refer to Attachment 8: DFCS Limited English Proficiency (LEP) Service Delivery Checklist for a list of required notices to be posted in all DFCS offices.

Accessibility to Websites and Online Systems

DHS must ensure program websites and online systems are accessible to constituents with LEP and with SI. DHS should ensure that in-house staff and contractors responsible for web page and content development are properly trained. DHS must provide a way for visitors to request accessible information or services to the extent required by law.

Section V Training

DHS staff will be trained on the Department's LEP/SI policies and procedures. The training will be provided at the employee's initial orientation and will be available on the DHS Learning Management System (LMS) website to be accessed as needed. The purpose of the training is to provide necessary background information about LEP/SI policies and procedures and to ensure staff know how to access interpretation services, translation services, assistive devices, auxiliary aids and services and other reasonable modifications for constituents with LEP and/or sensory impairments.

DFCS staff and Gateway community partners will be required to complete the DFCS Civil Rights Training and the DFCS ADA/Section 504 training, which includes training regarding policies and procedures for assisting LEP/SI constituents.

The DHS LEP/SI Policy and Manual are located and accessible on the DHS Policy and Manual Management System (PAMMS). The DHS website under the Language Access/Civil Rights webpage includes resources to aid staff in the delivery of services to constituen ts with LEP/SI.

Section VI Evaluation

Recording, Tracking and Monitoring

The DHS LEP/SI office will request data for services provided from interpretation and translation vendors as well as from Georgia Gateway on an as needed basis and will compile reports regarding constituents with LEP and/or with SI.

DHS receives data reports regarding constituents with LEP from language access vendors whenever language assistance services are utilized.

For DFCS: Data is collected in and reported by Georgia Gateway to ensure language assistance services for LEP/SI constituents. In Gateway, constituents may indicate their preferred language spoken and request an interpreter if an interview is required. For USDA programs, a civil rights compliance evaluation is conducted through DFCS Quality Assurance reviews in accordance with any federal statute regarding civil rights, which include reviews of a minimum number of LEP cases (at least 5 percent) and the deployment of LEP mystery shoppers from a third party LEP mystery shopper vendor. For each local office under review, DFCS will identify LEP cases that were terminated and ensure these cases were provided the appropriate language assistance services. For disability, DFCS conducts reviews in accordance with any federal statute regarding civil rights.

Service delivery to constituents with LEP and SI is evaluated using feedback from subrecipients, select constituents receiving services from DHS, staff securing services for constituents, language services contractors providing services to DHS constituents, and using the LEP Mystery Shopper program. The LEP/SI program uses the feedback to enhance programmatic operations and service delivery.

Discrimination Complaints

Constituents with LEP/SI must be given the opportunity to benefit from all available resources, services, and activities to the same extent as constituents who are not LEP/SI. DHS, its local offices and subrecipients are prohibited from discriminating on the basis of race, color, national origin, disability, age, sex,or any other protected classification.

They are also prohibited from retaliating against anyone for engaging in a protected Civil Rights activity.

Any constituent or representative alleging discrimination based on a prohibited basis has the right to file a complaint within 180 days of the alleged discriminatory action. Only the Secretary of the appropriate federal agency may extend this time under special circumstances. In all instances, the complainant must be informed of their right to file a discrimination complaint directly with the appropriate federal agency.

The complainant also must be advised of confidentiality and Privacy Act requirements. Subrecipients can develop complaint forms (optional), but the use of such forms cannot be a pre-requisite for acceptance. Written, oral and anonymous complaints must be accepted. If the constituent with LEP/SI wishes to file a verbal complaint, the constituent can contact the DHS LEP/SI office at (877) 423.4746. Additionally:

- Keep information and records of civil rights complaints separate from program or employment complaints and accessible only to authorized personnel.
- Post the Notice of Nondiscrimination in Services:
  - **For DAS & DCSS**:
    - In English, see Attachment 16
    - In Spanish, see Attachment 17
  - **For DFCS**:
    - In English, see Attachment 18
    - In Spanish, see Attachment 19
- To file a complaint for **DAS & DCSS** programs:
  - **DAS & DCSS Discrimination Complaint Process**:
    - In English, see Attachment 20
    - In Spanish, see Attachment 21
  - **DAS & DCSS Discrimination Complaint Form**:
    - In English, see Attachment 22
    - In Spanish, see Attachment 23
- To file a complaint for **DFCS programs**:
  - **DFCS Civil Rights Complaint Process**:
    - In English, see Attachment 24
    - In Spanish, see Attachment 25
  - **DFCS Civil Rights Complaint Form**:
    - In English, see Attachment 26
    - In Spanish, see Attachment 27

The complainant must be advised of their right to file a complaint directly with the appropriate federal agency.

- To file a complaint with the **USDA, Food and Nutrition Administration**:

  Office of the Assistant Secretary for Civil Rights
  U.S. Department of Agriculture
  1400 Independence Avenue, SW, STOP 9410
  Washington, D.C. 20250-9410

(Fax) to 1 (833) 256-1665 or (202)690-7442 or Email to program.intake@usda.gov. Federal Relay Service at (800) 877-8339; Voice/TTY/Espanol (English) How to File a Complaint (English) Discrimination Complaint Form (Spanish) www.usda.gov/sites/default/files/documents/ad-3027s.pdf

- To file a complaint with the **U.S. Health and Human Services**:

  U.S. Department of Health and Human Services

Office for Civil Rights Centralized Case Management Operations
200 Independence Ave., S.W.
Suite 515F, HHH Building
Washington, D.C. 20201
Customer Response Center: (800) 368-1019
Fax: (202) 619-3818
TDD: (800) 537-7697
Email: ocrmail@hhs.gov

Resolution of Noncompliance

For DFCS (USDA programs): Upon completion of an investigation, the investigator will work with county and/or district or regional management to recommend corrective action (if appropriate). If it is determined that the LEP complainant was discriminated against on the basis of one of the protected classes, or that DFCS personnel violated state or federal requirements, the DHS LEP/SI Program Manager will work with state, regional and county management and DFCS' SNAP Quality Assurance team (where applicable) to ensure that a corrective action plan is prepared, implemented, and monitored to address the violations. DFCS will abide by applicable USDA and HHS regulations and directives when ensuring the required corrective actions are achieved in a timely manner.

Manual 2001 Attachments

	Department of Human Services **Policy and Manual Management System**	**Index:**	**MAN 2001**
		Revised:	**07/01/2026**
		Next Review:	**06/30/2028**

Manual 2001 Access Plan for Constituents with Limited English Proficiency (LEP) and Sensory Impairments (SI)

Attachments

Attachment	Title
Attachment 1	Language Access Self Assessment
Attachment 2	Census-Language Spoken at Home
Attachment 3	I Speak Flashcard
Attachment 4	DAS and DCSS Guide for Providing Meaningful Access and Effective Communication to LEP/SI Constituents
Attachment 5	DFCS Guide for Providing Meaningful Access to LEP Constituents
Attachment 6	Interpretation / Translation Service Vendors
Attachment 7	DAS and DCSS Limited English Proficiency / Sensory Impairment (LEP/SI) Service Delivery Checklist
Attachment 8	DFCS Limited English Proficiency (LEP) Service Delivery Checklist
Attachment 9	Tips for Using Interpreters to Improve Service Delivery
Attachment 10	DCSS and DAS Translation Request Procedure
Attachment 11	DFCS Translation Request Procedure
Attachment 12	Georgia Relay Service - How to Guide
Attachment 13	Standards and Qualifications for Interpreters and Translators
Attachment 14	LEP/SI and SI Vendor Feedback Form
Attachment 15	Notice of Free Interpretation Services Poster
Attachment 16	DAS and DCSS Notice of Nondiscrimination in Services
Attachment 17	DAS and DCSS Notice of Nondiscrimination in Services (Spanish)
Attachment 18	DFCS Nondiscrimination Statement
Attachment 19	DFCS Notice of Nondiscrimination in Services (Spanish)
Attachment 20	Division of Aging Services (DAS) and Division of Child Support Services (DCSS) Discrimination Complaint Process
Attachment 21	Support Services (DCSS) Discrimination Complaint Process (Spanish)
Attachment 22	DAS and DCSS Discrimination Complaint Form
Attachment 23	DAS and DCSS Discrimination Complaint Form (Spanish)

Attachment	Title
Attachment 24	DFCS Civil Rights and ADA/Section 504 Complaint Process
Attachment 25	Civil Rights and ADA/Section 504 Complaint Process (Spanish)
Attachment 26	Attachment 26 DFCS Complaint Form
Attachment 27	Attachment 27 DFCS Complaint Form (Spanish)