

County of Gloucester

March 2012

LANGUAGE ASSISTANCE PLAN
(LAP)
FOR
PROVIDING COMMUNITY DEVELOPMENT BLOCK
GRANT AND HOME PROGRAM FUNDED ACTIVITIES
TO
LIMITED ENGLISH PROFICIENT
(LEP) PERSONS



GLOUCESTER COUNTY, NEW JERSEY

LANGUAGE ASSISTANCE PLAN

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GLOUCESTER COUNTY, NEW JERSEY

LANGUAGE ASSISTANCE PLAN

I. PURPOSE AND SERVICES

A. Purpose

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally-conducted programs and activities and who due to being Limited English Proficient (LEP) cannot fully and equally participate in, or benefit from, those programs and activities. Section 2 of Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to... federally conducted programs and activities by eligible LEP persons. Gloucester County has prepared this plan in compliance with Executive Order 13166.

B. Services

Gloucester County through the Department of Economic Development, Division of Housing and Community Development has the responsibility of administering the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership (HOME) Program, the Neighborhood Stabilization Program (NSP) and the USDA Housing Preservation Grant Program. The staff has expertise in the requirements and regulations of both of these federal programs, with the overall goal of improving the quality of life of the County's lower income residents. Daily implementation, budget allocation, reporting and monitoring are the responsibility of the Community Development Division staff. Gloucester County leverages all twenty-four of its municipalities to participate in the delivery of housing services along with community and economic development in the County's CDBG and HOME programs. Additionally, four quasi-public agencies, the Housing Authority of Gloucester County; the Glassboro Housing Authority; the Gloucester County Board of Social Services; and the Gloucester County Improvement Authority provide a major portion of the housing assistance in the County such as tenant subsidies, with Housing Choice Voucher funding, to 18 of 24 municipalities in the County. These agencies are key partners in meeting the objectives of the County's HUD programs in providing decent and affordable housing in a safe and secure living environment for low- and moderate-income residents. Lastly, the County continues to work with their certified CHDO Organizations, other non-profit housing developers, and non-profit social service providers to provide for the social services, rental and home ownership affordable housing needs of Gloucester County residents.

The Gloucester County Department of Economic Development, through its Division of Housing and Community Development, has been the lead entity in the provision of housing and community development assistance in the County. Currently, with funding from the Community Development Block Grant and the HOME Programs and ARRA funding under HPRP and CDBG-R, the Division administers two housing programs, tenant-based rental assistance, public service programs, homeless prevention and

assistance programs, the Municipal public facility improvement, public infrastructure and ADA improvement programs, and economic development revitalization activities. The Division directly administers the two housing programs, the Owner-Occupied Housing Rehabilitation and the First Time Homebuyers Assistance Program. Under the Municipal public facilities/infrastructure and ADA improvement programs, each individual municipality receives funding in a particular year dependent upon approval of their application and availability of funding. The funding for public services and public facility improvements are awarded to and administered by non-profit and public agencies that provide services to low and moderate income populations or populations with special needs.

Through the HOME Program, the Division also provides financial assistance for various housing initiatives carried out by Community Housing Development Organizations (CHDO), which include homebuyer assistance, substantial rehabilitation and construction of new affordable housing. The Division also provides technical assistance to local municipalities and private developers in developing housing and economic development programs or projects that will benefit low and moderate income County residents.

Through its Division of Workforce Investment Act, the Department of Economic Development also administers the Workforce Investment Act (WIA) program. With WIA funding, the ED Department provides basic educational remediation, GED certification, occupational training and on-the-job-training. The WIA Program also provides financial assistance for supportive services, such as transportation and childcare, for very low-income persons while they pursue further training or education. The ED Department has been taking advantage of its unique organizational set up to coordinate economic development activities pursued with CDBG assistance and job training programs available through the WIA Program.

At the local level, municipalities provide housing assistance primarily for emergency shelter and services through their welfare offices. A few also administer rehabilitation programs, which are funded with state resources such as the Balanced Housing or the Neighborhood Preservation Program. Most municipalities have become involved in the Council on Affordable Housing (COAH) process and have been working with private developers to provide more new affordable housing units. Additionally, most municipalities carry out community development activities with funding for public works from the Community Development Block Grant Program.

Four (4) quasi-public agencies provide a major portion of the housing assistance in the County: the Housing Authority of Gloucester County; the Glassboro Housing Authority; the Gloucester County Board of Social Services; and the Gloucester County Improvement Authority. The Housing Authority of Gloucester County and the Glassboro Housing Authority provide tenant subsidies, with Housing Choice Voucher funding, to 18 of 24 municipalities in the County. These housing authorities often work with the Board of Social Services, local welfare offices and the Department of Economic Development, Division of Housing and Community Development, in receiving and placing applicants. In addition, the Housing Authorities provide public housing for citizens of participating communities, mostly for very low income elderly, disabled and family households.

The Board of Social Services coordinates most of the emergency assistance in the County. The Board provides emergency shelter and supportive housing services and financial assistance to people at risk of becoming homeless. It often contracts with non-profit agencies to provide additional services and case management.

Through its involvement with these private non-profit agencies, the Board of Social Services has been able to place the homeless and those with special needs, in alternative types of emergency housing such as transitional housing and SRO's. They have also coordinated with other social or human services providers, especially for job training and education, and with permanent housing providers, to reduce recidivism and promote self-sufficiency. The Gloucester County Improvement Authority services the affordable housing loan and the economic development loan funds for the County. The affordable housing loan fund is available to private developers for construction financing assistance. Additionally, the GCIA has the capability and authority to issue bonds for public facility and infrastructure improvements for local governments.

Private non-profit agencies have been crucial to the provision of emergency shelter and supportive housing services in the County. Agencies such as the Volunteers of America; Pathstone, the Boys and Girls Club of Gloucester County, the Gateway Community Action Agency; People for People; Center for Family Services; Mother/Child Residential Services, Inc.; the American Red Cross, Robins Nest, and Catholic Charities have provided the needed support for the homeless and special needs populations. These same agencies plus others such as SODAT of New Jersey also provides necessary social services, such as counseling and case management. Most of these agencies receive federal and/or state funding, and already work in cooperation with County and local government agencies.

Private developers and lending institutions have also been involved in housing and economic development initiatives in the County. Private banks in the County have provided construction and rehabilitation financing for several affordable housing projects carried out by CHDOs, other non-profit agencies and private developers. They have also provided low interest mortgage financing to low income homebuyers. Additionally, the banking community has been very supportive of cooperative and joint financing of economic development projects. They have provided long term financing assistance to private businesses that have also secured funding from the County through the CDBG Program.

See **Appendix I** for a list of departments/agencies that provide services to housing residents, Section 8 voucher holders and applicants.

II. DEPARTMENTAL LANGUAGE ACCESS POLICY and GOALS

Gloucester County's policy is to provide equal access to HUD activities and housing opportunities for all qualified applicants and residents. The County of Gloucester complies with all state and federal rules and regulations and does not discriminate on the basis of race, religion, color, national or ethnic origin, sexual orientation, age, marital status or disability in admission to, access to, or operations of its programs, services, or activities. The County's Office of Educational and Disability Services is responsible for compliance and may be contacted at 856-681-6128/New Jersey Relay Service 711 or the EEO office at 856-384-6903.

Pursuant to the LAP, the County has taken reasonable steps, to ensure that persons with limited English proficiency ("LEP persons") have meaningful access to County's programs, services and activities. The County will provide language assistance services to LEP persons and the County will establish

standardization in its processes.

The following language assistance services, activities, and programs are provided:

- The County currently has one bilingual employee on staff that is trained in providing Spanish interpretation and translation services in person and over the phone and is available to the Division of Housing and Community Development programs. This employee is also available to attend Public Hearings as needed and translate Public Notices and program brochures.
- The County will provide translation services for other languages through a contract vendor, World Wide Interpreters or comparable service, an on call telephone interpretation service, on an as needed basis.
- The Gloucester County Housing Authority has three bilingual employees on staff that are trained in providing Spanish interpretation and translation services.
- The County works directly with non-profit housing and social service agencies, including Pathstone, Volunteers of America; Pathstone, the Boys and Girls Club of Gloucester County, the Gateway Community Action Agency; People for People; Center for Family Services; Mother/Child Residential Services, Inc.; the American Red Cross, Robins Nest, and Catholic Charities. Interpretation services are coordinated with these agencies as needed.

On a yearly basis the County will:

- Update its Language Assistance Program Services procedures to include guidelines and standards on accessing language services for all employees who provide direct services.
- Regularly train staff involved in providing services to sub-recipients, residents, applicants and Section 8 voucher holders on the County's Language Assistance policy and procedure for delivering language assistance services to the LEP population served by the County.
- Develop a system to track language assistance needs of LEP persons who access the County's programs and activities.

Manager/ Coordinator/ Point of Contact

The Housing and Community Development Division Head serves as the primary point of contact for the Language Assistance Plan and is responsible for the management and coordination of the LAP.

Oversight responsibilities include:

- Monitoring the implementation of the Language Assistance plan, and updating it annually.
- Meet with partner agencies to ensure compliance with the requirements for providing language assistance services.
- Provide annual assessment of the language assistance needs by reviewing data on the provision of language services and the prior year's provision of language assistance services, and recommending modifications of the plan, as required.
- Monitor the translation of important documents.

- Oversee quality control assessment of language services.
- Provide information to partners to help them determine their roles and responsibilities, reporting and monitoring requirements, and to identify emerging languages and changes in the proportion of existing language groups.

III. LEP POPULATION ASSESSMENT

The County will provide language services based on the needs of LEP persons it serves. The County receives funds from the US Department of Housing and Urban Development (HUD) and applies HUD's four-factor analysis as specified in its Final Guidance to Federal Financial Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons dated January 22, 2007 (HUD Guidance) to determine the LEP population it serves. The HUD guidance was issued pursuant to US Department of Justice directive, and is consistent with the Department of Justice Guidance.

The four factors to be assessed include:

- The number or proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program; and
- The resources available and costs to the recipient.

Factor No. 1: The Number or Proportion of LEP Persons Served

The following chart identifies the CDBG/HOME funded programs operated and/or funded by the Gloucester County Department of Economic Development, Division of Housing and Community Development and the service area of each:

HUD FUNDED PROGRAM	SERVICE AREA
Educational Services	Funding for educational services for residents of the Elsemere Public Housing Development in Glassboro
Youth Services	Funding to Boys & Girls Club – available to residents Countywide
Nutrition Services	Funding to Food Bank of South Jersey – available to residents Countywide
Community Services	Funding for operation of Newfield Terrace Community Center for residents of the Newfield Terrace neighborhood in Newfield
Owner-Occupied Housing Rehabilitation	Financial Assistance for housing rehabilitation

	– County wide
Homebuyers Assistance Programs	Downpayment and closing assistance for home acquisition - Countywide
Tenant-Based Rental Assistance	Rent subsidies for homeless families - Countywide
CHDO Programs to Provide Affordable Housing for Homeownership	Funds provided to non-profit developers for affordable housing construction - Countywide
Public Facility/Infrastructure Improvements	Countywide
Economic Development (Revolving Loan Fund)	Revolving Loan Program for business retention and attraction - Countywide

The number and percentage of LEP persons were determined using the data reported from the 2006-2010 American Community Survey data which identifies the number of people that speak a particular language, and whether they speak English very well. The following tables (Table I and Table II) summarize the data from the 206-2010 American Community Survey for Gloucester County:

Table I Gloucester County	Estimate	Margin of Error
Population 5 years and over	267,790	+/-33
Speak only English	245,448	+/-1,175
Spanish or Spanish Creole:	8,877	+/-608
Speak English "very well"	6,116	+/-643
Speak English less than "very well"	2,761	+/-481
French (incl. Patois, Cajun):	562	+/-163
Speak English "very well"	472	+/-150
Speak English less than "very well"	90	+/-54
French Creole:	36	+/-37
Speak English "very well"	29	+/-32
Speak English less than "very well"	7	+/-16
Italian:	2,733	+/-544
Speak English "very well"	1,941	+/-369
Speak English less than "very well"	792	+/-285
Portuguese or Portuguese Creole:	625	+/-227
Speak English "very well"	431	+/-194
Speak English less than "very well"	194	+/-95
German:	857	+/-206
Speak English "very well"	655	+/-137
Speak English less than "very well"	202	+/-138
Yiddish:	36	+/-28
Speak English "very well"	36	+/-28
Speak English less than "very well"	0	+/-123
Other West Germanic languages:	112	+/-75
Speak English "very well"	85	+/-61
Speak English less than "very well"	27	+/-43

Greek:	567	+/-238
Speak English "very well"	398	+/-181
Speak English less than "very well"	169	+/-101
Russian:	366	+/-192
Speak English "very well"	173	+/-118
Speak English less than "very well"	193	+/-103
Polish:	537	+/-206
Speak English "very well"	429	+/-171
Speak English less than "very well"	108	+/-76
Serbo-Croatian:	13	+/-22
Speak English "very well"	0	+/-123
Speak English less than "very well"	13	+/-22
Other Slavic languages:	167	+/-89
Speak English "very well"	103	+/-71
Speak English less than "very well"	64	+/-55
Persian:	113	+/-85
Speak English "very well"	53	+/-59
Speak English less than "very well"	60	+/-52
Gujarati:	668	+/-375
Speak English "very well"	491	+/-296
Speak English less than "very well"	177	+/-123
Hindi:	244	+/-184
Speak English "very well"	140	+/-125
Speak English less than "very well"	104	+/-99
Urdu:	37	+/-57
Speak English "very well"	18	+/-28
Speak English less than "very well"	19	+/-29
Other Indic languages:	772	+/-363
Speak English "very well"	514	+/-246
Speak English less than "very well"	258	+/-146
Other Indo-European languages:	153	+/-85
Speak English "very well"	127	+/-75
Speak English less than "very well"	26	+/-32
Chinese:	793	+/-317
Speak English "very well"	437	+/-186
Speak English less than "very well"	356	+/-202
Japanese:	143	+/-111
Speak English "very well"	68	+/-54
Speak English less than "very well"	75	+/-93
Korean:	295	+/-180
Speak English "very well"	197	+/-148
Speak English less than "very well"	98	+/-77
Thai:	67	+/-67
Speak English "very well"	29	+/-28
Speak English less than "very well"	38	+/-46
Vietnamese:	356	+/-174
Speak English "very well"	196	+/-123
Speak English less than "very well"	160	+/-86
Other Asian languages:	935	+/-349

Speak English "very well"	510	+/-216
Speak English less than "very well"	425	+/-209
Tagalog:	1,364	+/-409
Speak English "very well"	965	+/-253
Speak English less than "very well"	399	+/-275
Other Pacific Island languages:	93	+/-91
Speak English "very well"	68	+/-82
Speak English less than "very well"	25	+/-40
Hungarian:	37	+/-35
Speak English "very well"	37	+/-35
Speak English less than "very well"	0	+/-123
Arabic:	374	+/-218
Speak English "very well"	238	+/-117
Speak English less than "very well"	136	+/-120
Hebrew:	136	+/-121
Speak English "very well"	136	+/-121
Speak English less than "very well"	0	+/-123
African languages:	237	+/-131
Speak English "very well"	201	+/-123
Speak English less than "very well"	36	+/-35

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
2006-2010 American Community Survey 5-Year Estimates

Table II	Gloucester County, New Jersey					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	267,790	+/-33	97.4%	+/-0.3	2.6%	+/-0.3
Speak only English	91.7%	+/-0.4	(X)	(X)	(X)	(X)
Speak a language other than English	8.3%	+/-0.4	68.6%	+/-3.1	31.4%	+/-3.1
Spanish or Spanish Creole	3.3%	+/-0.2	68.9%	+/-5.1	31.1%	+/-5.1
Other Indo-European languages	3.2%	+/-0.4	70.9%	+/-4.0	29.1%	+/-4.0
Asian and Pacific Island languages	1.5%	+/-0.2	61.2%	+/-6.9	38.8%	+/-6.9
Other languages	0.3%	+/-0.1	78.3%	+/-12.3	21.7%	+/-12.3
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish or Spanish Creole	8,877	+/-608	68.9%	+/-5.1	31.1%	+/-5.1
5-17 years	2,100	+/-396	86.6%	+/-5.8	13.4%	+/-5.8
18-64 years	6,193	+/-407	63.9%	+/-6.3	36.1%	+/-6.3
65 years and over	584	+/-87	58.0%	+/-12.3	42.0%	+/-12.3
Other Indo-European languages	8,611	+/-1,011	70.9%	+/-4.0	29.1%	+/-4.0
5-17 years	1,353	+/-329	83.6%	+/-9.2	16.4%	+/-9.2
18-64 years	5,693	+/-695	71.8%	+/-4.3	28.2%	+/-4.3
65 years and over	1,565	+/-259	56.9%	+/-11.2	43.1%	+/-11.2
Asian and Pacific Island languages	4,060	+/-603	61.2%	+/-6.9	38.8%	+/-6.9
5-17 years	713	+/-229	72.7%	+/-14.9	27.3%	+/-14.9
18-64 years	2,818	+/-443	58.6%	+/-8.4	41.4%	+/-8.4
65 years and over	529	+/-74	59.7%	+/-25.3	40.3%	+/-25.3
Other languages	794	+/-279	78.3%	+/-12.3	21.7%	+/-12.3
5-17 years	118	+/-95	100.0%	+/-25.2	0.0%	+/-25.2
18-64 years	612	+/-216	76.8%	+/-14.6	23.2%	+/-14.6
65 years and over	64	+/-63	53.1%	+/-53.1	46.9%	+/-53.1

LANGUAGE SPOKEN AT HOME
2006-2010 American Community Survey 5-Year Estimates

Maps included in **Appendix II** indicate the percentages of racial groups in the County's census tracts. The highest ratios of African American (above 21%) are concentrated in the Borough of Paulsboro, and sections of the City of Woodbury, the Borough of Glassboro and Deptford Township. The Hispanic population is concentrated (above 5%) in Swedesboro and sections of Deptford Township and the Borough of Glassboro, while the Asian population is highest (above 3%) in portions of Deptford Township, and Washington Township.

According to the 2006-2010 American Community Survey 5-Year Estimates, 97.4% of the County's residents over 5 years of age speak English very well. 2.6% of the County's residents over 5 years of age speak English "less than very well."

8.3% (8,877) of the County's residents speak a language other than English at home. The predominant foreign languages spoken at home by persons over five years, according to the American Community Survey are Spanish or Spanish Creole, and Italian. In addition to these two languages, there are (31) thirty-one other languages residents speak at home. Table I provides a full listing of these languages.

- Of the 8,877 residents who speak Spanish or Spanish Creole at home, 2,761 speak English less than “very well.”
- Of the 2,733 who speak Italian at home, 792 speak English less than “very well.”

Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group that constitutes either at least 1,000 persons or 5% of the population of persons eligible to be served or likely to be affected or encountered. In Gloucester County, only the Spanish speaking language involves more than five percent of the population or more than 1,000 LEP persons. The next highest in number and percentage are Italian and Tagalog; there are a total of 769 residents who speak English less than “very well” and 399 residents who speak less than “very well” in these categories. In both cases, the totals are less than 1% of the County population.

While many of the federally funded services and programs are targeted to low- and moderate-income persons, the US Census LEP data is not cross-tabbed with household income to evaluate the potential eligibility of LEP persons for HUD programs.

Factor No. 2: Frequency of Contact

The County of Gloucester has reviewed the need for language assistance in providing services related to federally funded (e.g., CDBG/HOME) programs and has determined that the need is low for Countywide services. Approximately 7,000 residents speak English “less than very well.” This is approximately 2.4% of the County population. The 7,000 residents that speak English “less than very well” represent more than (30) thirty languages. Only one language, Spanish, has a number greater than 1,000 residents who speak English less than “very well.” There are concentrations of Spanish speaking LEP citizens in Woodbury, Deptford, Swedesboro, South Harrison, Glassboro and Franklin.

County staff responsible for the administration of the CDBG and HOME grants and for implementing the housing rehabilitation program and first time homebuyer program report minimal contact from LEP persons whose primary language is Spanish. In order to provide translation services to these residents, the County currently has one Spanish bilingual employee on staff that can effectively communicate with Spanish speaking LEP persons and translate written documents.

Housing Authority staff responsible for the administration of the TBRA program also report minimal contact from LEP persons whose primary language is Spanish. However, the Housing Authority employs three bilingual employees who are available to provide in house translation services.

The CDBG subgrantees, public service providers, and Community Development Housing Organizations (CHDO) interact with LEP persons on a limited basis, with the exception of the following social service agencies: Pathstone, Robin’s Nest, the Center for Family Services and Gateway Community Action Partnership. These agencies have prepared, and will continue to prepare written outreach materials and program applications in Spanish and to provide translation services.

Factor No. 3: The Nature and Importance of the Program, Activity or Service

The County's Consolidated Plan for FY2010-14 sets forth objectives and actions in priority housing and non-housing community development areas for the County's low and moderate-income residents and neighborhoods. Priority needs in the Consolidated Plan include preserving and increasing affordable housing and supportive services, reducing housing discrimination, preventing and addressing homelessness, and addressing nonhousing community development needs such as neighborhood improvements, public services, accessibility improvements and economic development. Five year objectives are identified in the areas of housing, homeless, public services, economic development and public facilities and infrastructure.

The following is a complete list of those programs/objectives that could directly involve LEP persons. The three most likely to involve LEP persons are assisting low- and moderate-income first-time homebuyers, assisting low and moderate income homebuyers with housing rehabilitation assistance, and assisting applicants applying for rental assistance. Additional objectives that could directly involve LEP persons include: reducing housing discrimination; sustaining and improving access to affordable housing through programs such as fair housing, delivery of flexible services to the homeless that support stability and independence, preserving and strengthening the County's safety net for families and individuals who are in crisis or vulnerable; empowering residents to improve their economic self-sufficiency; ensuring that people with disabilities, seniors, single parents, and culturally and linguistically isolated populations have awareness of and access to services; and providing education, recreation, childcare, and other support services for low- and moderate-income families and individuals; providing economic development and entrepreneurship opportunities to low-income residents.

The County will identify the vital documents used in the programs most likely to involve LEP residents and will focus its efforts to provide language services accordingly. A partial list of vital documents includes:

- Published Notices about the CDBG/HOME program, including public hearing and meetings on Community Development Needs, Action Plan, Consolidated Plan and Notices seeking public comments
- Marketing materials that explain the availability of federally funded services and programs
- Applications to receive services, benefits or participate in programs or activities
- Annual Reviews/Income Recertification Notices of public hearings
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Leases/Mortgage Documents
- Notices of rights, denial, loss, or reduction of benefits or services
- Discrimination complaints
- Resident Grievance Procedures

Factor No. 4: Available Resources and Costs

The County of Gloucester has reviewed the need for language assistance in providing services related to federally funded (e.g., CDBG/HOME) programs and has determined that the need is low for Countywide

services. Approximately 7,000 residents speak English “less than very well.” This is approximately 2.4% of the County population. The 7,000 residents that speak English “less than very well” represents more than (30) thirty languages. Only one language, Spanish, has a number greater than 1,000 residents who speak English less than “very well.”

County staff responsible for implementing the CDBG/HOME grants, housing rehabilitation program and first time homebuyer program report minimal contact from LEP persons whose primary language is Spanish. In order to provide translation services to these residents, the County currently has one Spanish bilingual employee on staff that can effectively communicate with Spanish speaking LEP persons and translate written documents. The County will contract with a vendor, similar to World Wide Interpreters on an as needed basis to applicants and residents who speak a foreign language other than Spanish. World Wide Interpreters is an on call telephone interpretation system with access to 150 plus languages. The service is cost effective because there is no monthly fee or minimum use charge.

Beginning in FY 2012-13, the CDBG/HOME program shall budget for publication of program notices in a Spanish language newspaper.

In summary, due to the fairly low need to provide meaningful access for LEP persons, the employment of one bilingual staff in the County, three bilingual employees at the Housing Authority, bilingual employees at the local non-profit providers and the use of outside consultant/and or translators is the most cost-effective means of delivering competent and accurate language services.

IV. IMPLEMENTATION PLAN & LOGISTICS

The County will oversee the implementation of the Language Assistance Plan and has identified the following milestones to enhance its current delivery of language services:

- The County’s LEP Point of Contact will assess language needs, determine when interpretation and/or translation are needed and are reasonable, and recommend implementation strategies for language services.
- Catalog language abilities of staff and determine if existing bilingual staff are adequate or whether there is a need to provide contractors/ consultants to supplement interpretation services.
- Identify staff that require language assistance training and establish tentative training schedule based on importance of service to be provided.
- Maintain a list of interpreter and translators and their contact information
- Train all staff of partner agencies involved in providing services to residents, applicants. Determine time frame of delivery and technical assistance.
- Develop standard protocols for phone call intake and the associated training in Language Assistance Services; Tailor the training to provide emphasis of how to handle telephone calls from LEP callers.
- Continue to identify vital documents that require translation into languages encountered.

V. SERVICE PLAN

A. Interpreter Services (Oral Language Services)

The County, the Housing Authority and County subgrantees will provide interpretation services on an as needed basis through on staff bilingual employees and contract vendors. In no instance will it be necessary for residents to provide their own translation services through family members. However, a LEP person may utilize an adult family member or friend (18 years of age or older) as an interpreter after s/he is informed about the availability of free language assistance services and chooses not to use them. The County will ensure to the extent possible that the bilingual staff and/or contract vendors have knowledge of the LEP person's dialect, vocabulary, and phraseology.

The County, the Housing Authority and County subgrantees will provide oral interpretation services for the following activities, including but not limited to the following:

- Public Hearings
- Program Application Reviews
- Eligibility Interview
- Rental Interview/Voucher Briefing
- Tenant/Applicant Hearings
- Annual and Interim Recertification

The City may require a formal interpreter to certify to the following:

- i. the interpreter understood the matter communicated and rendered a competent interpretation
- ii. the interpreter will not disclose non-public data without written authorization from the client

The CDBG/HOME Citizen Participation Plan will be amended to state that oral interpretation at public meetings and hearings related to the CDBG/HOME program will be arranged if requested by LEP persons at least five business days in advance of the meeting or hearing. All public hearing notices will include a statement about the availability of interpreter services at the public hearing.

Use of oncall telephone Interpretation services: Staff shall use the oncall interpretation service when bilingual staff is not available, when the language is not one commonly encountered, or when staff is not sure what language the client speaks, at no cost to the client.

The following is the procedure for use of the service:

Create a three-way conference call. When an interpreter is on the phone and the language is identified, state your name, the name of your agency, and a brief description of what is needed from the LEP client. When the interpreter says "Go ahead, please," the call begins.

- Speak slower than your normal speed of talking
- Speak in short sentences, expressing one idea at a time
- Pause frequently to allow the interpreter to interpret small segments of information at a time; the interpreter is a few words behind the speaker
- Give the interpreter time to finish before speaking again

- Check for client understanding; provide opportunities for clarification
- When checking for understanding, ask the LEP client, "What do you understand?" rather than "Do you understand?"
- Ask the interpreter if, in his/her opinion, the client seems to have grasped the information that you are conveying; you may have to repeat or clarify certain information by saying it in a different way
- When the conversation is completed, thank both the client and the interpreter and say "interpreter, end of call" and the call ends

B. Written Material Translation

HUD LEP Guidance indicates, "vital documents" are documents that solicit or contain information for establishing or maintaining eligibility to participate in County programs or services, or documents that create or define legally enforceable rights or responsibilities. County vital documents will be translated into Spanish. Vital documents include, but are not limited to:

- Published Notices about the CDBG/HOME program, including public hearing and meetings on Community Development Needs, Action Plan, Consolidated Plan and Notices seeking public comments
- Marketing materials that explain the availability of federally funded services and programs
- Applications to receive services, benefits or participate in programs or activities
- Annual Reviews/Income Recertification Notices of public hearings
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Leases/Mortgage Documents
- Notices of rights, denial, loss, or reduction of benefits or services
- Discrimination complaints
- Resident Grievance Procedures

On a continued basis the County will provide and make available flyers, most written communications (emails, letters), and documents to County LEP residents in Spanish. Minority media will be used for publishing.

The U.S. Department of Housing and Urban Development website contains downloadable LEP documents in up to fourteen languages on topics such as fair housing and home buying that can be utilized by County/subgrantee staff as appropriate. The U.S. Environmental Protection Agency (EPA) website has downloadable public information about lead in English and Spanish on its website.

C. Signage at Public Facilities

The County will post notices on the availability of free language assistance services in the locations where the department serves members of the public and/ or Section 8 participants.

D. Outreach

TRAINING

The County will develop a class schedule to provide training for new and existing employees who provide direct services to residents, applicants and voucher holders. Training will include:

- An overview of the County's Language Assistance policy and procedures
- Methods to identify the language in which the customer needs assistance.
- Methods to access language services through bilingual staff or other sources.
- Methods to work with an interpreter.
- Cultural sensitivity training

The trainings will be made available to bilingual staff hired to provide language assistance.

E. RECORD KEEPING AND EVALUATION

The County will track the following information regarding service requests it receives and devise additional methods of tracking language needs and languages encountered:

- The requesting department/development or city agencies;
- Direct calls from applicant/resident;
- Language;
- Type of service, and who provided the service (e.g. bilingual staff, volunteer or vendor);
- Translation requests.

Appendix

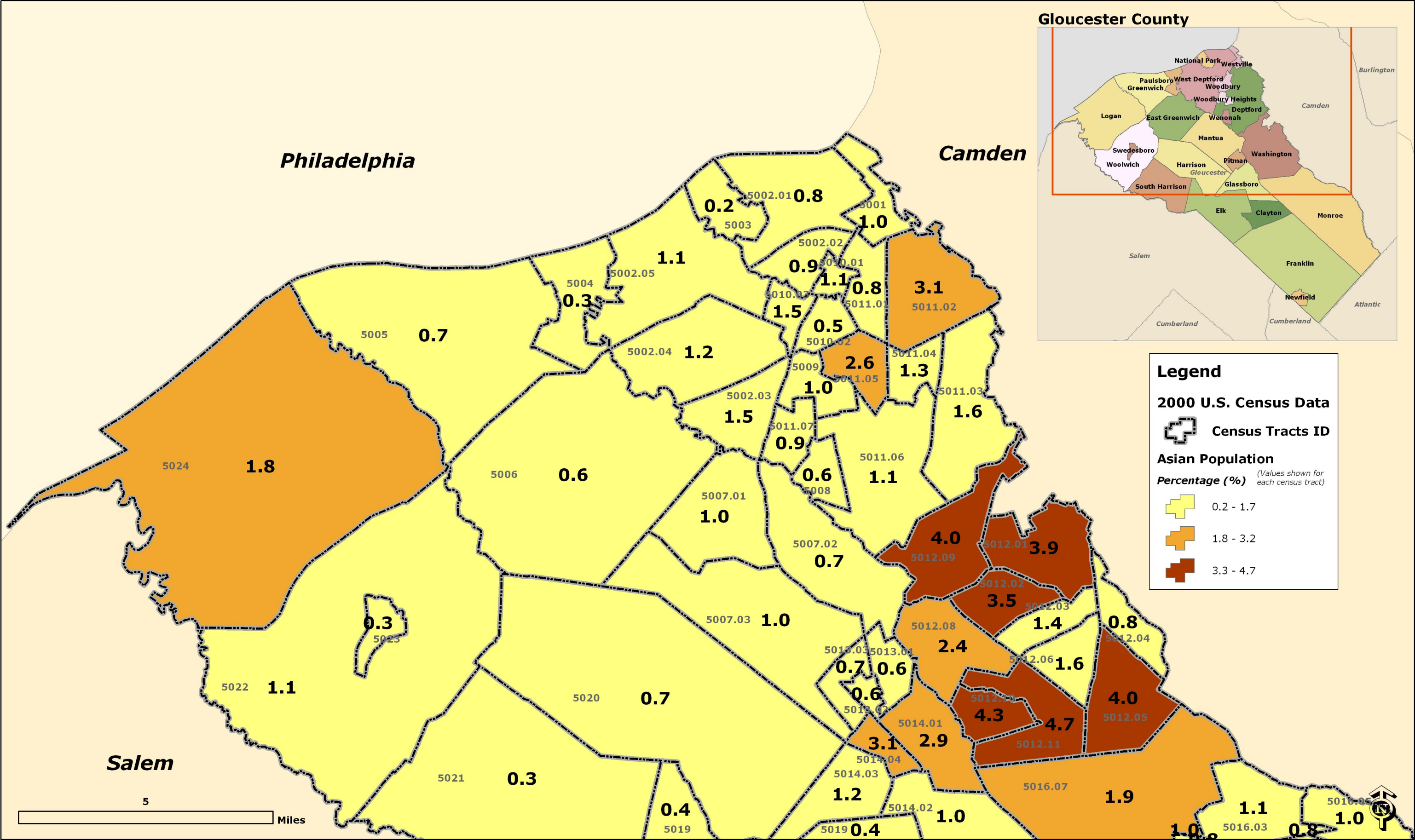
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Maps



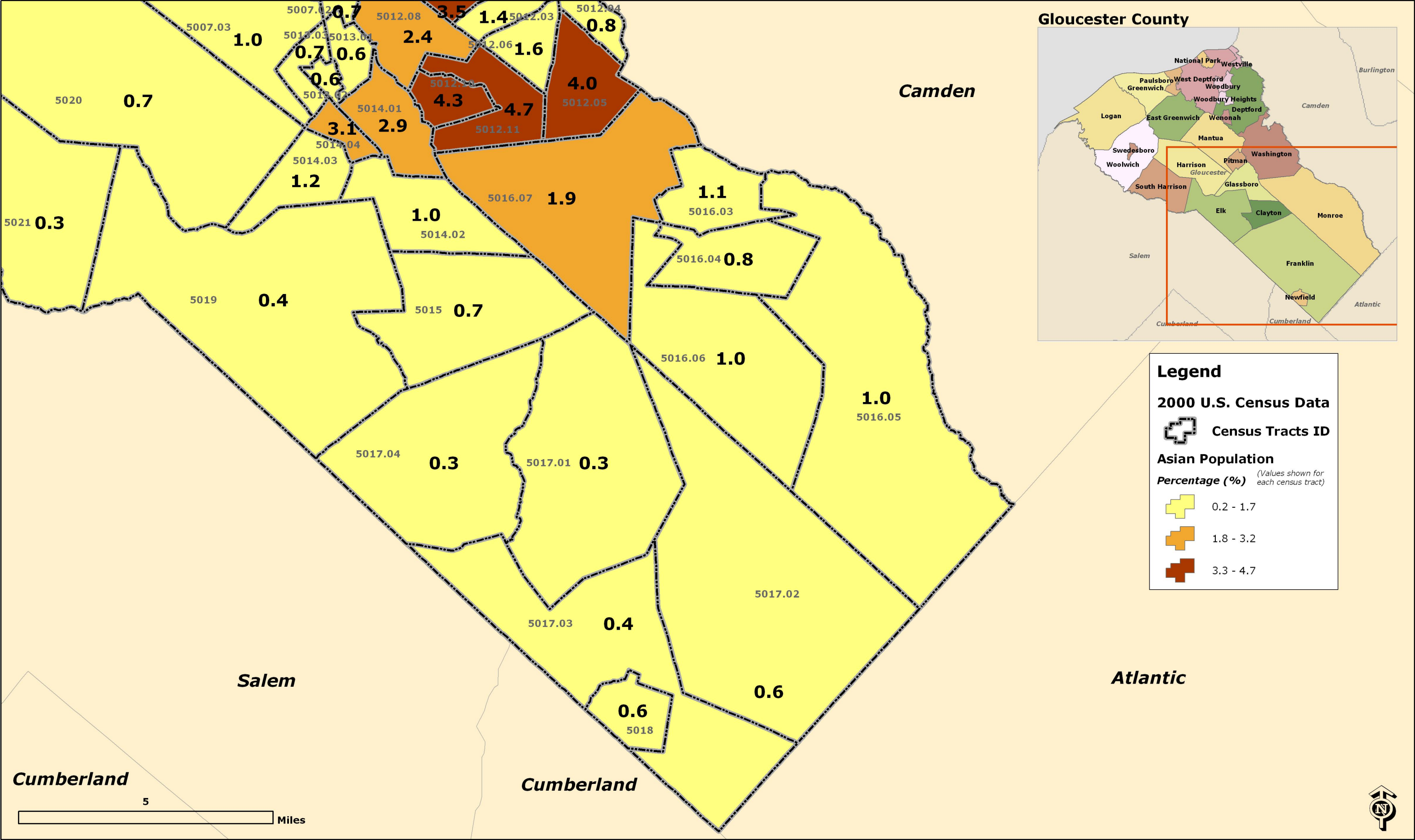
Gloucester County - Detail I

Percentage of Asian Population by Census Tract



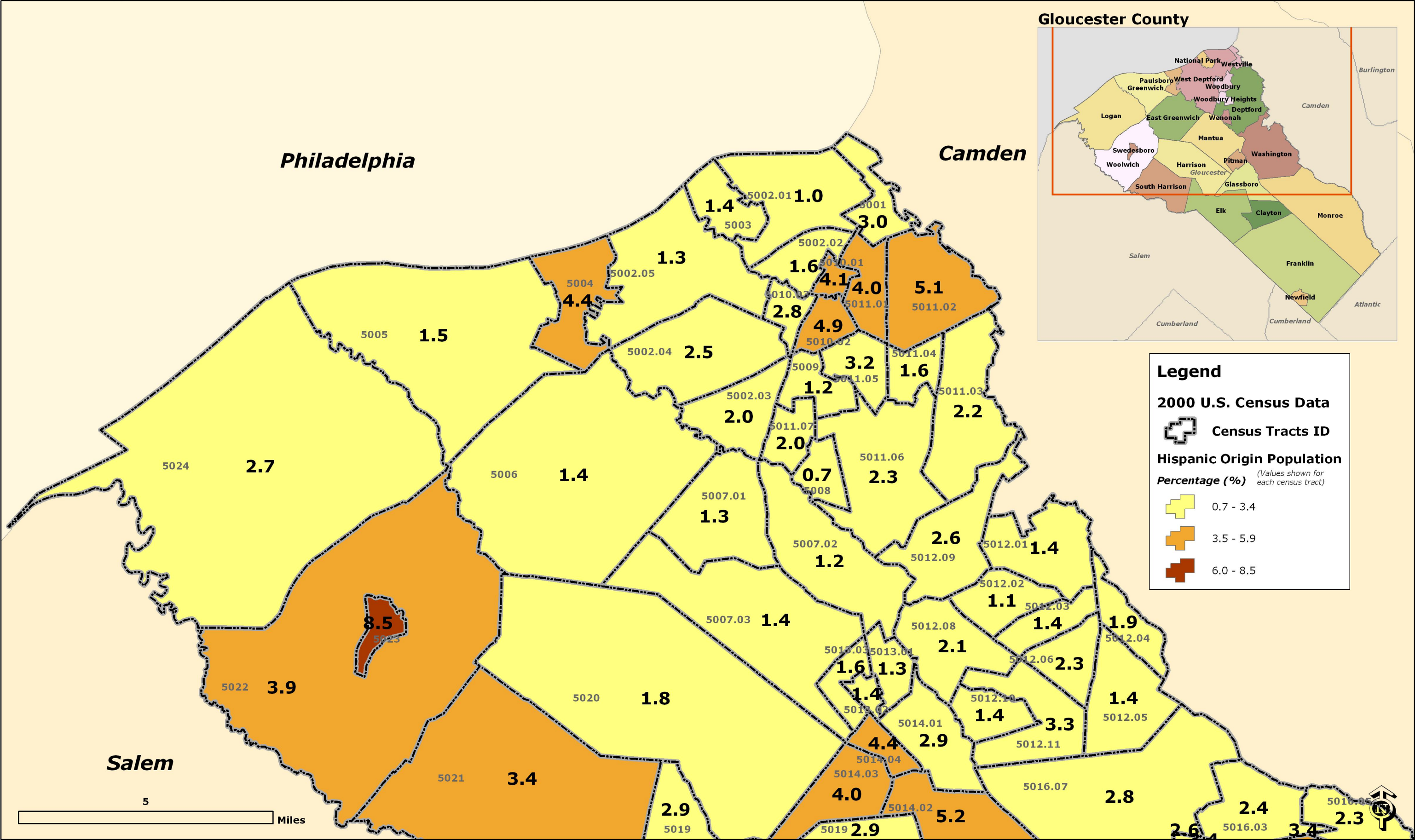
Gloucester County - Detail II

Percentage of Asian Population by Census Tract



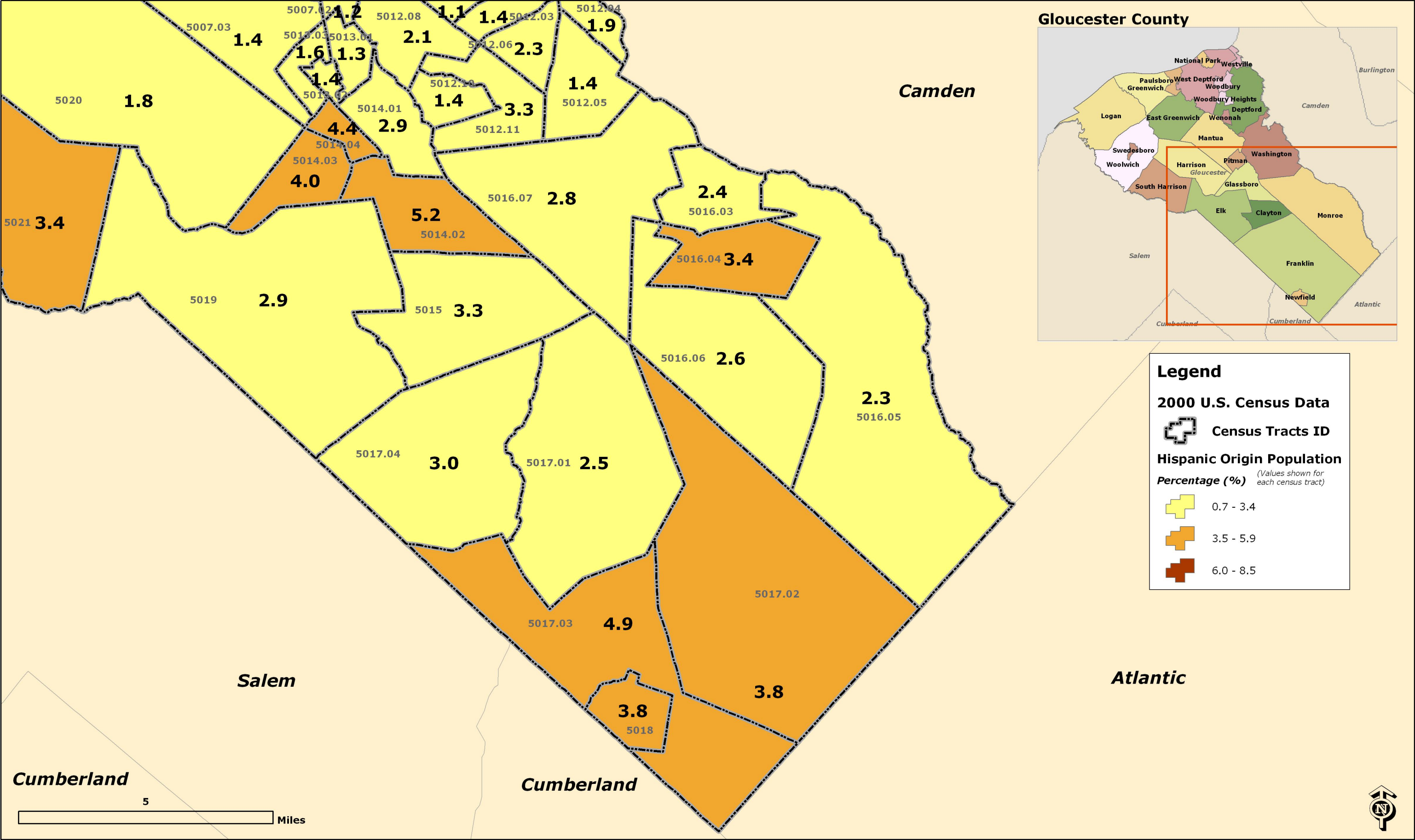
Gloucester County - Detail I

Percentage of Hispanic Origin Population by Census Tract



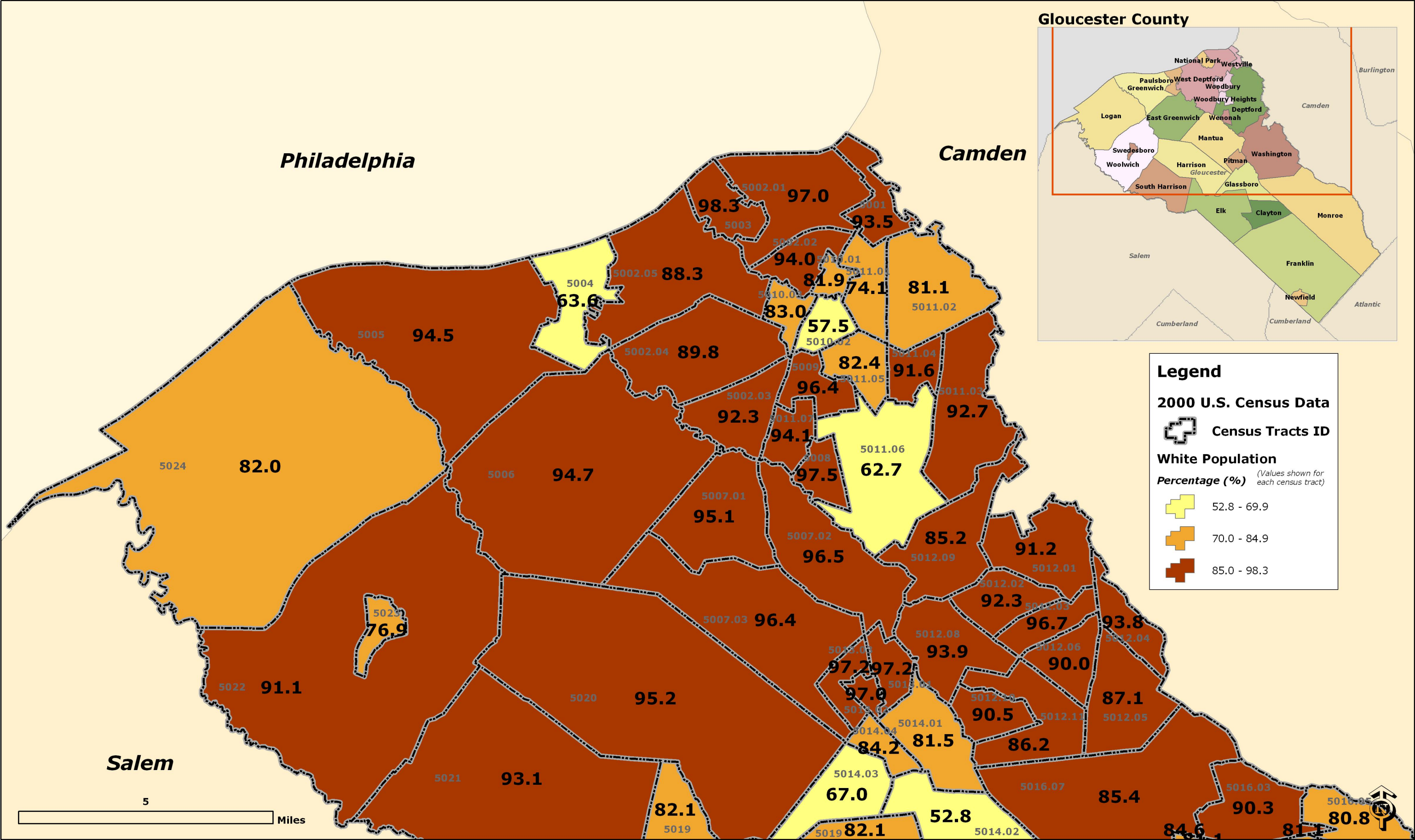
Gloucester County - Detail II

Percentage of Hispanic Origin Population by Census Tract



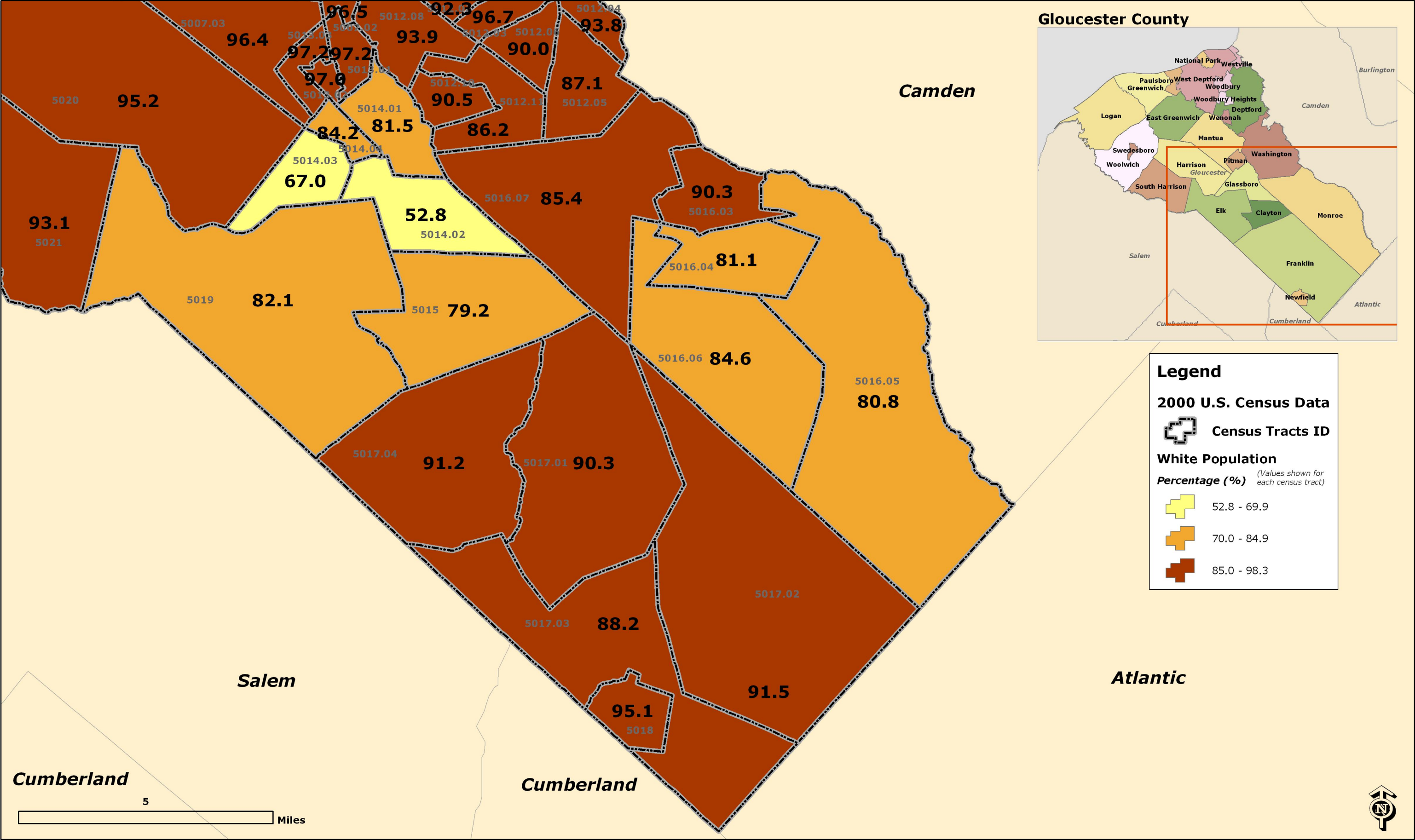
Gloucester County - Detail I

Percentage of White Population by Census Tract



Gloucester County - Detail II

Percentage of White Population by Census Tract



Appendix

II

Resources



HOUSING AND COMMUNITY DEVELOPMENTS RESOURCES

LOCAL RESOURCES

Gloucester County Housing Authority

The Housing authority of Gloucester county offers a variety of rental housing assistance programs including Section 8 Housing Choice Voucher Program, Public Housing Program for Families, and Public Housing for Elderly and Disable Persons. The waiting lists for the programs administered by the Authority provide a preference for those applicants who are living in or working with the operating jurisdiction of the Authority.

At the present time, participating communities are the boroughs of Clayton, National Park, Paulsboro, Swedesboro, Westville and Woodbury Heights, the Townships of Deptford, Elk, Greenwich, East Greenwich, Harrison, Logan, Monroe, Mantua, West Deptford and Washington and the Cities of Woodbury and Glassboro.

Gloucester County Department of Health and Senior Services

This Department has three Divisions that provide programs and services related to Community Development Block Grant activities. By contract with all 24 municipalities, the Division of Health provides a range of public health nursing activities, environmental health services and public health information and health education services to all residents of Gloucester County. Many of these services focus upon protecting persons from health threats and assisting residents to adopt healthful lifestyles. The Division of Senior Services provides information and assistance to aid residents of Gloucester County 60 years of age or older and their families. Its mission is to promote accessible and high-quality health and senior services to help all seniors in Gloucester County attain optimal health and independence. The Division of Mental Health, Drugs and Alcohol oversees a range of programs and services in the areas of mental health, drug treatment, and alcohol. The Department also plays a key role in homeland security, by helping to prevent and prepare for terrorist attacks.

Gloucester County Department of Human Services

The Department of Human Services administers a number of significant programs through its five Divisions: 1) Administration of Grants, Fiscal Management, and One Ease-E-Link; 2) Human Services Planning and Case Assessment Resource Team; 3) Transportation Services; 4) Youth Services; 5) Addiction Services. The Gloucester County Division of Addiction Services Office is responsible for coordinating substance abuse prevention and rehabilitation services for Gloucester County. The Division of Youth Services consists of two separate components: the Youth Services Commission/Juvenile Crime Enforcement Coalition (YSC/JCEC), and Substance Abuse Prevention & Education programs. The Gloucester County Case Assessment Resource Team (CART) reviews cases that involve children, ages 0 to 18, whose emotional or psycho-social problems are so pronounced as to cause the youth to come to the attention of a private or public institution such as the local school system, the family court, a church, or a community based agency. Division of Transportation Services (DTS) provides fare-free, non-emergency, curb-to-curb services for the following Gloucester County residents:

- Senior Citizens (60 years or older),
- Veterans,
- Permanently or Temporarily Disabled Residents,
- Medicaid Eligible Residents,
- Dialysis Patients,
- Radiation and/or Chemotherapy Patients,
- Therapy (Physical/Occupational) Patients.

Information and Referral (I&R) is a toll-free community resource providing current information on unlimited types of issues, and referral to available services within Gloucester County and statewide. Special Services include

- Language Interpretation for Non-English speaking individuals.
- Accessible to the Deaf and Hard of Hearing (TTY).
- Crisis Response
- Clarification Of Important Issues
- Exploring Your Options

Gloucester County Department of Parks and Recreation

Gloucester County Parks and Recreation is responsible for the organization and development of the recreational environment within the County.

Gloucester County Office of Disability Services

The Office provides a clearinghouse of information and works closely with the community, consumers, local agencies, advocates and advisory groups. The Disabled Persons Advisory Commission (DPAC) works directly with the County's Office of Disability Services to provide insight, relevancy in programs, services, and guidelines and recommendations for the ODS Director and Staff.

Gloucester County Department of Veterans Affairs

The Department of Veterans Affairs provides health care for veterans at a clinic in Sewell, provides transportation services for veterans, and operates the Gloucester County Veterans Memorial Cemetery in Monroe Township.

Gloucester County Board of Social Services

The Gloucester County Board of Social Services (formerly, the Gloucester County Welfare Board) was established in 1932 under the New Jersey Statutes Annotated, Title 44 to provide for widows and children. Through the years the Board expanded to include many more services such as Medicaid, Food Stamps, Child Support and Paternity, emergency assistance and employment support activities as well as cash assistance to needy County families and adults.

The Board's mission and the responsibility is to provide an opportunity for self-sufficiency to individuals and families through economic and social service programs designed for this purpose . The board and its employees are committed to offering these services in an atmosphere of mutual trust and respect without regard to race, creed, disability, sex or national origin.

Gloucester County Workforce Investment Board

The Workforce Investment Board is a partnership of top executives from businesses, county and state government agencies in Gloucester County. The WIB is designed to create a workforce tailored to meet the needs of the community and produce an environment that will empower existing businesses, as well as bring new industry to the area.

Shady Lane Nursing Home

Shady Lane Nursing Home provides nursing care for all eligible residents of Gloucester County through the Gloucester County Improvement Authority. It supplies residents with the needs of daily living, assists them in being as independent as possible, helps them to retain their dignity as members of society, encourages them to participate in the community and ensures their rights as citizens.

It is the responsibility of Shady Lane to accomplish all this without discrimination as to race, creed, national origin, or political affiliation. It is also their responsibility to keep abreast of all current trends and requirements of long-term care management, education, caption research and medical developments related to patient care and to disseminate and implement this information to all concerned.

Gloucester County Special Services School District

Gloucester County Special Services School District (GCSSSD) provides a wide range of educational services to the families of Gloucester County. GCSSSD serves children with special needs from birth to age 21. The enrollment figures for the 43 acre Bankbridge complex in Deptford and the Child Development Center in Turnersville, as of September 2002, are approximately 600 special needs students.

In addition to the schools, GCSSSD provides the following services to support the special needs children of Gloucester County: the Early Intervention Program for children

birth to 3 years and their families, and Regional Council which provides professional services to the school districts of Gloucester Camden Counties.

Work First New Jersey

The Work First New Jersey Office administers the Gloucester County Work First New Jersey (WFNJ) Program. The goal of the WFNJ Program is to help Temporary Assistance to Needy Families (TANF) recipients to quickly find full time, entry level employment. The emphasis on work is in response to new federal regulations which limit receipt of public assistance to 5 years over an individual's adult lifetime. In order to help TANF recipients to meet this limitation, the WFNJ Office conducts weekly Job Search/Job Readiness sessions, assists in the development of resumes, assesses educational/job skill levels, combines education and training opportunities with work experiences through the Community Work Experience Program. A close working relationship with community employers and the Employment Service Office provides TANF recipients with on-site employment registration and job interview screening opportunities.