



# **Coffee County Government**

## **Limited English Proficiency (LEP) Plan**

### **Title VI Documentation**

#### **I. Introduction**

This Limited English Proficiency Plan has been prepared to address Coffee County Government's responsibilities as they relate to the needs of individuals with limited English proficiency (LEP). The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, U.S.C. 2000d, et seq., and Executive Order 13166 and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

#### **A. Plan Summary**

As a recipient of federal funds, Coffee County Government is required to take reasonable steps to ensure meaningful access to our services by LEP persons. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, and how to notify LEP persons that assistance is available. The following four-factor LEP analysis has been used to determine what steps Coffee County will take to ensure that vital information, both written and verbal, which is provided in English is translated into the non-English language of regularly encountered LEP groups served by our county:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Coffee County Government for services or information.
2. The frequency with which LEP persons come in contact with Coffee County Government for services or information.
3. The nature and importance of programs, activities or services provided by Coffee County Government to the LEP population.
4. The resources available to Coffee County Government and overall cost to provide LEP assistance.

## **II. Meaningful Access: Four-Factor Analysis**

### **1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Coffee County Government for services or information.**

Coffee County Government reviewed the information available for Coffee County, Tennessee from the United States Census Bureau on July 1, 2023 and determined the following:

#### **Coffee County Tennessee Summary of People with Limited English Proficiency (Based on 2023 Data)**

Total County Population: 58,252

White Non-Hispanic: 89.58%  
American Indian/Alaska Native: .43%  
Asian: 1.13%  
Hispanic: 4.88%  
Black Non-Hispanic: 3.73%  
Two or More Races: .07%

### **2. The frequency with which LEP persons come in contact with Coffee County for services or information.**

Coffee County has an interpreter on staff for encounters or situations where a county employee needs assistance to serve or take care of a customers' needs (paying property taxes, renewing vehicle registration, etc.). In most instances the only need for paid interpreters or bilingual staff arises with law enforcement at the Coffee County Jail or with the criminal court system. Coffee County has staff employed in our Sheriff's Office and our Court System who are bilingual (English and Spanish) Other than Spanish speaking individuals, LEP individuals needing assistance for other languages is fewer than four encounters per year. Based on this review and the small number of people that in fact fall into this category we estimate that our staff has had minimal contact with LEP persons. There have been no reports of issues arising where our staff has been unable to meet the needs of an LEP customer.

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

Coffee County Government provides services for all Coffee County citizens and on a more limited basis to individuals who reside outside of Coffee County. All citizens use our services including those that have Limited English Proficiency. Coffee County has been able to serve its LEP residents and persons ensuring those individuals have the same access to services and information as the English-speaking residents.

#### **4. The resources available to Coffee County Government and overall cost to provide LEP assistance.**

Coffee County Government currently employees' individuals who are bilingual; each speaks fluent Spanish and English. This is at no extra cost to the County because those employees fulfill the duties of their job description in addition to having the ability to interpret if called upon. Legal documents are available in Spanish. Many forms and other informational material are also available in Spanish. The State of Tennessee provides interpreters for criminal defendants and victims.

### **III .Language Assistance**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Coffee County Government services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. Coffee County Government will normally utilize interpretation services provided by our bilingual employees or if it involves law enforcement or court proceedings, Coffee County Government will utilize the paid interpretation services. Employees of Coffee County Government have been trained on how to identify a LEP person and know how to contact each of our bilingual employees.

#### **A. Language Assistance Measures**

Since there are a very low percentage of individuals in Coffee County that qualify as LEP according to the U.S. Census, Coffee County Government presently does not take any additional measures beyond those outlined above. Coffee County Government will monitor the effectiveness of this program and will provide interpretation methods for other languages as determined necessary by the County to ensure people that qualify as LEP are provided access to our services. Other measures will be evaluated as the need arises, but the primary language assistance measures will continue to be on-site bilingual employees, paid interpreters, and information, forms, and documents in Spanish.

#### **IV. Staff Training**

The following training is provided to Coffee County Government employees:

1. Information on LEP responsibilities.
2. Contact information for bilingual employees.
3. Steps to be taken in tracking of language assistance requests.

#### **V. Formal Interpreters**

Coffee County Government will continue to use paid interpreters, bilingual employees, and translated information as the main way of communicating and serving LEP persons.

#### **VII. Informal Interpreters**

Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP customer. Coffee County Government staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest. These informal interpreters will be used on a case by case basis. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place or as a supplement to translation services Coffee County Government offers.

#### **VIII. Outside Resources**

Outside resources may include paid interpreters (particularly for the court system and community volunteers and may be used at public or informal meetings or events.

#### **IX. Monitoring and Updating**

This plan is designed to be flexible and should be viewed as a work in progress. As such it is important to consider whether new documents and services need to be made accessible for LEP persons. Coffee County Government will monitor changes in demographics and types of services and the LEP will be reviewed periodically to assess and update the plan as needed.

## **X. Dissemination of the Coffee County Government LEP Plan**

The plan will be posted on the Coffee County Government website. Questions or comments should be submitted to the Personnel & Benefits Department of Coffee County Government at:

Coffee County Government  
Attn: Personnel & Benefits  
1329 McArthur Street, Suite 3  
Manchester, TN 37355