SAMPLE

Select type of report (Four-Factor Analysis or Four-Factor Analysis and Language Access Plan)

FOUR-FACTOR ANALYSIS
and
LANGUAGE ACCESS PLAN
FOR LIMITED ENGLISH PROFICIENCY PERSONS

COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM

COMMUNITY NAME

Purpose: In compliance with Executive Order 13166, Community Name has developed the following Language Access Plan (LAP) for Limited English Proficiency (LEP) persons.

History: Title VI of the Civil Rights Act of 1964 is the federal law which protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

Community Name Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the Community Name will undertake to guarantee access to the Community Name Community Development Block Grant (CDBG) programs by LEP persons.

1. Number or proportion of LEP persons served or encountered in the eligible service population (served or encountered includes those persons who would be served by the recipient if the person received education and outreach and the recipient provided sufficient language services).

   Select the paragraph(s) below that best describe your methodology. Delete the other paragraph(s). These paragraphs may be modified or replaced with narrative that more accurately reflects the community's methodology. Replace the shaded areas with information about your community.

   Currently, the U.S. Census does not provide data regarding Limited English Proficiency below the County Level. Therefore, for determining the LEP population, Community Name utilized the following method(s) to determine the LEP population in Community Name.

   Individuals conducting income surveys in the project area were asked to determine if any LEP households were located in the potential project area. According to surveyors, there were number of LEP households

households located in the proposed project area. This does/does not represent a threshold population of LEP residents.

Local elected officials, clergy, medical personnel, and school administrators were polled by telephone/questionnaire to request input regarding their knowledge of LEP households within the community and/or proposed project area(s). Based on the results of the telephone poll/questionnaires, there are an estimated number of LEP households households located in Community Name. This does/does not represent a LEP threshold population.

County Name utilized Census 2000 Special Tabulation 194 and Table 4, Language Spoken at Home and Ability to Speak English for Population 18 Years and Over. Based on this data, County Name does/does not meet the 1,000 or 5% LEP persons threshold for any languages or Language(s) identified.

2. The frequency with which the LEP persons come into contact with the program.

Select the paragraph(s) below that best describe your methodology. Delete the other paragraph(s). These paragraphs may be modified or replaced with narrative that more accurately reflects the community's methodology.

The proposed project does include acquisition, relocation, housing rehabilitation, and/or water/sewer hookups. Therefore, residents are likely to have considerable direct contact with the program and its staff.

The proposed project is an infrastructure project that does not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the CDBG program. However, all citizen participation activities are open to the general public.

3. The nature and importance of the program, activity, or service provided by the program.

Select the paragraph(s) below that best describe your methodology. Delete the other paragraph(s). These paragraphs may be modified or replaced with narrative that more accurately reflects the community's methodology. Replace the shaded areas with information about your community.

The proposed project does provide direct assistance to project area beneficiaries related to housing/hookups/acquisition; therefore, the nature of the activity or service is of significant importance to the proposed project area(s) residents.

The proposed project does not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the CDBG program. However, all citizen participation activities are open to the general public.

4. The resources available and costs to the recipient.

Currently, internet sites can be utilized to translate some written materials. Additionally, local volunteers have been identified to provide oral translation services at public meetings and during conversations with LEP residents during the implementation of the proposed project. Furthermore, many of the common forms used in the implementation of a CDBG project are available in multiple languages on the HUD and DOL websites. Additionally, translation activities are an eligible CDBG administrative expense. Therefore, limited LAP measures are reasonable given the resources available to Community Name.

Once the Four-Factor Analysis has been completed, the community must determine if a LAP is required.

If the community determines that a LAP is **not** required, then the certification below should be signed and dated by the chief elected official and the Four-Factor Analysis should be kept in the Fair Housing and Equal Opportunity CDBG program file.

If the Four-Factor Analysis identifies a LEP threshold population and/or if the nature of the program activities is such that a LAP is triggered, please delete the certification below and complete the LAP section at the end of this sample document.

Certification: Based on the above Four-Factor Analysis, the Community Name is not required to develop a LAP. However, the Community Name will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation activities.

Chief Elected Official	Date

Language Access Plan: As a result of the preceding Four-Factor Analysis, Community Name has identified the following types of language assistance to be provided on an as needed basis by Community Name throughout the implementation of the CDBG program:

Select the paragraphs below that best describe your planned activities. Delete the other paragraph(s). These paragraphs may be modified or replaced with narrative that more accurately reflects the community's planned activities. Replace the shaded areas with information about your community.

- *All CDBG citizen participation documents, project-related resolutions, public notices, and amendments will be published in LEP language identified on bulletin boards at the City Hall/County Courthouse and in public places throughout the proposed project area(s) and/or the community.*

- *Additionally, all published citizen participation advertisements will include a statement in LEP language identified indicating other program materials are available in LEP language identified upon request.*

- *All citizen participation notices will include a statement that translators will be available at public meetings upon prior request.*

- *If needed, a translator may be retained to provide oral translation in the field during the implementation of the project activities (generally for housing rehabilitation, hookups, acquisition, and relocation projects only).*

- *If other populations of LEP persons are identified in the future, Community Name will consider additional measures to serve the language access needs of those persons.*

Adopted:

_____	_____	_____
Date Adopted	Chief Elected Official Signature	Attest

Language Spoken at Home for the Citizen Population 18 Years and Over Who Speak English Less Than "Very Well", for the United States, States, and Counties: 2000

Source: Census 2000 Special Tabulation 194.

Note: Data are based on a sample and are rounded. (D) indicates suppression for disclosure concerns.

FIPS State and County Codes	State Postal Abbreviation	Area Name	Total	Speak Spanish or Spanish Creole	Speak other Indo European language	Speak Asian or Pacific Island language	Speak other language
18	IN	Indiana	61515	31360	22655	5950	1550
18001	IN	Adams County	1030	105	925	0	0
18003	IN	Allen County	3300	1670	940	565	125
18005	IN	Bartholomew County	470	190	165	115	0
18007	IN	Benton County	45	30	(D)	(D)	0
18009	IN	Blackford County	45	25	(D)	(D)	0
18011	IN	Boone County	85	(D)	40	(D)	0
18013	IN	Brown County	65	(D)	(D)	0	0
18015	IN	Carroll County	125	105	(D)	(D)	0
18017	IN	Cass County	430	325	(D)	(D)	0
18019	IN	Clark County	405	275	75	(D)	(D)
18021	IN	Clay County	70	40	(D)	0	(D)
18023	IN	Clinton County	180	(D)	(D)	0	0
18025	IN	Crawford County	25	20	4	0	0
18027	IN	Daviess County	540	90	440	(D)	(D)
18029	IN	Dearborn County	230	(D)	135	(D)	0
18031	IN	Decatur County	50	(D)	(D)	0	0
18033	IN	DeKalb County	135	50	35	(D)	(D)
18035	IN	Delaware County	655	505	125	(D)	(D)
18037	IN	Dubois County	360	(D)	235	0	(D)
18039	IN	Elkhart County	3870	1560	2100	(D)	(D)
18041	IN	Fayette County	80	(D)	(D)	0	0

FIPS State and County Codes	State Postal Abbreviation	Area Name	Total	Speak Spanish or Spanish Creole	Speak other Indo European language	Speak Asian or Pacific Island language	Speak other language
18043	IN	Floyd County	390	130	215	20	20
18045	IN	Fountain County	105	50	35	25	0
18047	IN	Franklin County	145	(D)	75	(D)	0
18049	IN	Fulton County	180	135	(D)	(D)	0
18051	IN	Gibson County	135	90	25	20	0
18053	IN	Grant County	640	375	155	(D)	(D)
18055	IN	Greene County	145	75	65	(D)	(D)
18057	IN	Hamilton County	1400	455	485	430	30
18059	IN	Hancock County	240	115	80	40	0
18061	IN	Harrison County	125	100	(D)	(D)	0
18063	IN	Hendricks County	440	225	115	(D)	(D)
18065	IN	Henry County	285	165	80	(D)	(D)
18067	IN	Howard County	480	245	170	(D)	(D)
18069	IN	Huntington County	250	160	75	20	0
18071	IN	Jackson County	275	185	25	65	0
18073	IN	Jasper County	210	125	75	(D)	(D)
18075	IN	Jay County	100	40	60	0	0
18077	IN	Jefferson County	145	115	(D)	(D)	0
18079	IN	Jennings County	75	50	(D)	0	(D)
18081	IN	Johnson County	440	225	120	(D)	(D)
18083	IN	Knox County	160	100	40	(D)	(D)
18085	IN	Kosciusko County	995	455	430	105	0
18087	IN	LaGrange County	2630	230	2385	(D)	(D)
18089	IN	Lake County	13000	8505	3740	505	245
18091	IN	LaPorte County	1070	570	395	30	80
18093	IN	Lawrence County	125	75	40	(D)	(D)
18095	IN	Madison County	755	490	195	55	15
18097	IN	Marion County	9465	4905	2840	1355	365
18099	IN	Marshall County	730	290	405	(D)	(D)

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18101	IN	Martin County	15	(D)	(D)	0	0
18103	IN	Miami County	180	115	35	(D)	(D)
18105	IN	Monroe County	1205	445	400	260	100
18107	IN	Montgomery County	125	80	25	(D)	(D)
18109	IN	Morgan County	190	130	60	0	0
18111	IN	Newton County	105	40	45	(D)	(D)
18113	IN	Noble County	680	420	200	60	0
18115	IN	Ohio County	10	(D)	0	0	0
18117	IN	Orange County	80	50	(D)	0	(D)
18119	IN	Owen County	40	15	25	0	0
18121	IN	Parke County	130	35	90	(D)	(D)
18123	IN	Perry County	85	30	55	0	0
18125	IN	Pike County	40	20	(D)	(D)	0
18127	IN	Porter County	1335	660	470	175	30
18129	IN	Posey County	100	65	35	0	0
18131	IN	Pulaski County	55	30	25	0	0
18133	IN	Putnam County	155	95	(D)	(D)	0
18135	IN	Randolph County	95	55	40	0	0
18137	IN	Ripley County	75	50	(D)	(D)	0
18139	IN	Rush County	35	(D)	(D)	(D)	0
18141	IN	St. Joseph County	3265	1665	1105	355	140
18143	IN	Scott County	85	(D)	(D)	0	0
18145	IN	Shelby County	185	110	(D)	(D)	0
18147	IN	Spencer County	100	30	75	0	0
18149	IN	Starke County	215	(D)	160	(D)	0
18151	IN	Steuben County	220	130	(D)	(D)	0
18153	IN	Sullivan County	135	115	(D)	(D)	0
18155	IN	Switzerland County	30	20	10	0	0
18157	IN	Tippecanoe County	1735	835	425	375	105

FIPS State and County Codes	State Postal Abbreviation	Area Name	Total	Speak Spanish or Spanish Creole	Speak other Indo European language	Speak Asian or Pacific Island language	Speak other language
18159	IN	Tipton County	60	45	(D)	10	(D)
18161	IN	Union County	45	(D)	25	(D)	0
18163	IN	Vanderburgh County	1185	490	465	(D)	(D)
18165	IN	Vermillion County	55	15	30	(D)	(D)
18167	IN	Vigo County	445	230	135	(D)	(D)
18169	IN	Wabash County	200	100	(D)	(D)	0
18171	IN	Warren County	20	(D)	(D)	0	0
18173	IN	Warrick County	315	205	75	35	0
18175	IN	Washington County	125	(D)	90	(D)	0
18177	IN	Wayne County	465	260	120	50	35
18179	IN	Wells County	190	110	70	(D)	(D)
18181	IN	White County	270	190	(D)	(D)	0
18183	IN	Whitley County	120	60	45	(D)	(D)