

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

**COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM**

Town of Jay

Purpose: In compliance with Executive Order 13166, Town of Jay has developed the following Language Access Plan (LAP)/Four Factor Analysis for Limited English Proficiency (LEP) persons.

History: Title VI of the Civil Rights Act of 1964 is the federal law that 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.

Town of Jay Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the Town of Jay will undertake to guarantee access to the Jay 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).

Local elected officials, clergy, medical personnel, and school administrators were polled by telephone/in-person interview 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 no LEP persons located in Jay. This does not represent a LEP threshold population.

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

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.

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

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.

4. The resources available and costs to the recipient.

Currently, there are free websites that 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 the Town of Jay.

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 Town of Jay is not required to develop a LAP. However, the Town of Jay will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation activities.



Chief Elected Official

3-10-2022

Date