

# **Town of Jay Language Access Policy CDBG-DR**

In compliance with Executive Order 13166, the Town of Jay has developed the following Language Access Plan (LAP) with Four-Factor Analysis for Limited English Proficiency (LEP) persons, and persons with visual or auditory impairment.

## **PURPOSE**

The purpose of the language access policy is to create a process by which the Town of Jay can consistently provide meaningful access to its activities, programs, and services for individuals with Limited English Proficiency (LEP), and persons with visual or auditory impairment as required by Title VI of the Civil Rights Act of 1964 and the Department of Housing and Urban Development (HUD). The term "Limited English Proficiency" includes any individual whose primary language is not English and/or is limited in their ability to read, write, speak, or understand English as their primary language. This includes people with said limited proficiency or other impairments due to a disability.

The Town of Jay is responsible for administering Community Development Block Grant – Disaster Recovery (CDBG-DR) funds as a result of having been designated by Florida Commerce as a most impacted or distressed area. This policy outlines how the Town of Jay plans to ensure that LEP individuals have meaningful access to the CDBG-DR program and includes the Four-Factor Analysis the Town will complete to identify LEP person(s) in the jurisdiction that meet HUD-recommended thresholds for the provision of translation services by the Town of Jay.

## **LEGAL AUTHORITY**

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. Federal Register requirements state that recipients of Federal funding must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons, to avoid denying benefits as a result of national origin.

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.

## **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 Town of Jay Community Development Block Grant program 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).

- 2) The frequency with which the LEP persons come into contact with the program.
- 3) The nature and importance of the program, activity, or service provided by the program.
- 4) Resources available and costs to the recipient.

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-DR 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.

This policy has been adopted by the Town of Jay Town Council by a vote of four (4) yeas and zero (0) nays on October 6, 2025.

  
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Donna Bullock, Town Clerk

  
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Shon Owens, Mayor