FOUR-FACTOR ANALYSIS FOR LIMITED ENGLISH PROFICIENCY PERSONS

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM LEDYARD, CT

Purpose: In compliance with Executive Order 13166, the Town of Ledyard 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.

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

   The Town of Ledyard utilized Census 2021 Table S1601, Language Spoken at Home for Population 5 Years and Over and Table S1602 Limited English-Speaking Households. Based on this data, the Town of Ledyard does not meet the 1,000 or 5% LEP persons threshold for any languages or Language(s) identified. Please see attached.

2. The frequency with which the LEP persons encounter the program.

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

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

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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 the Town of Ledyard.

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

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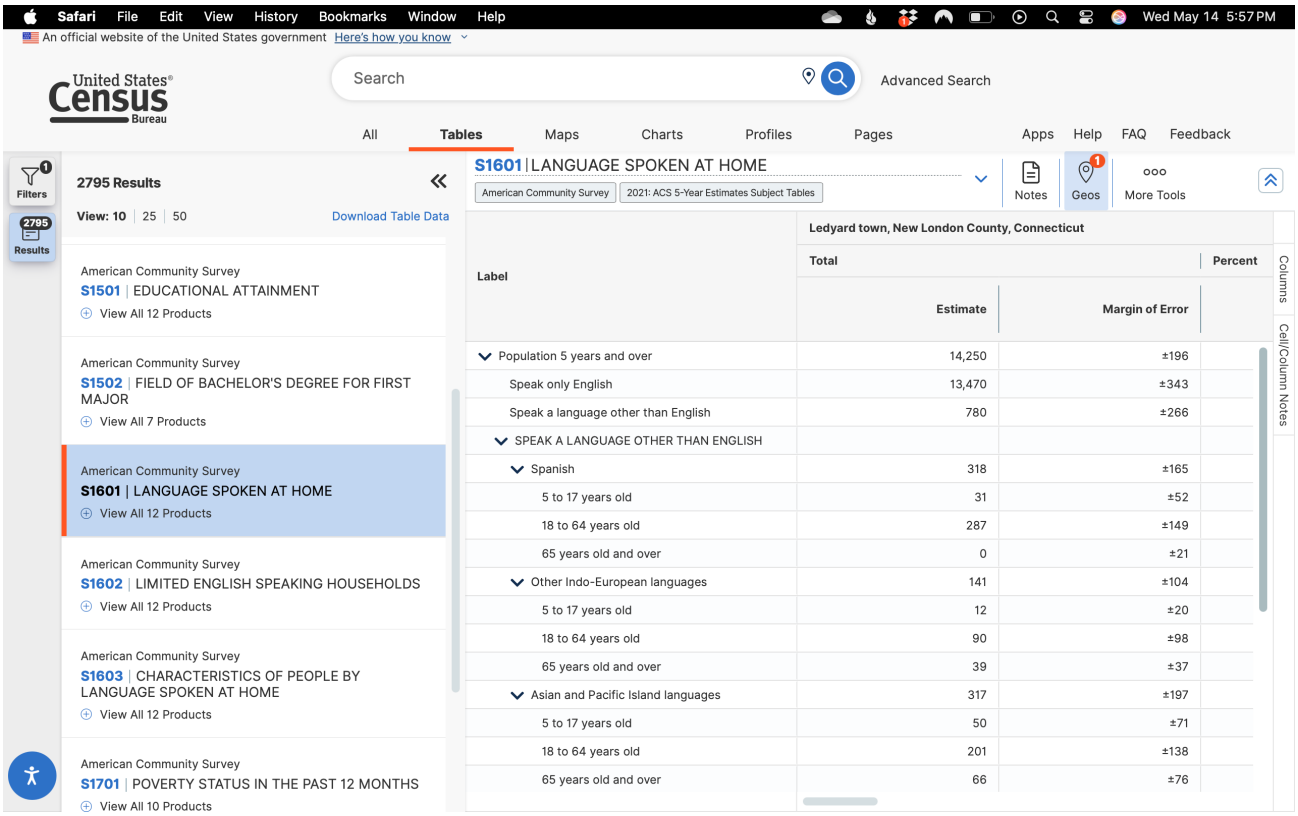
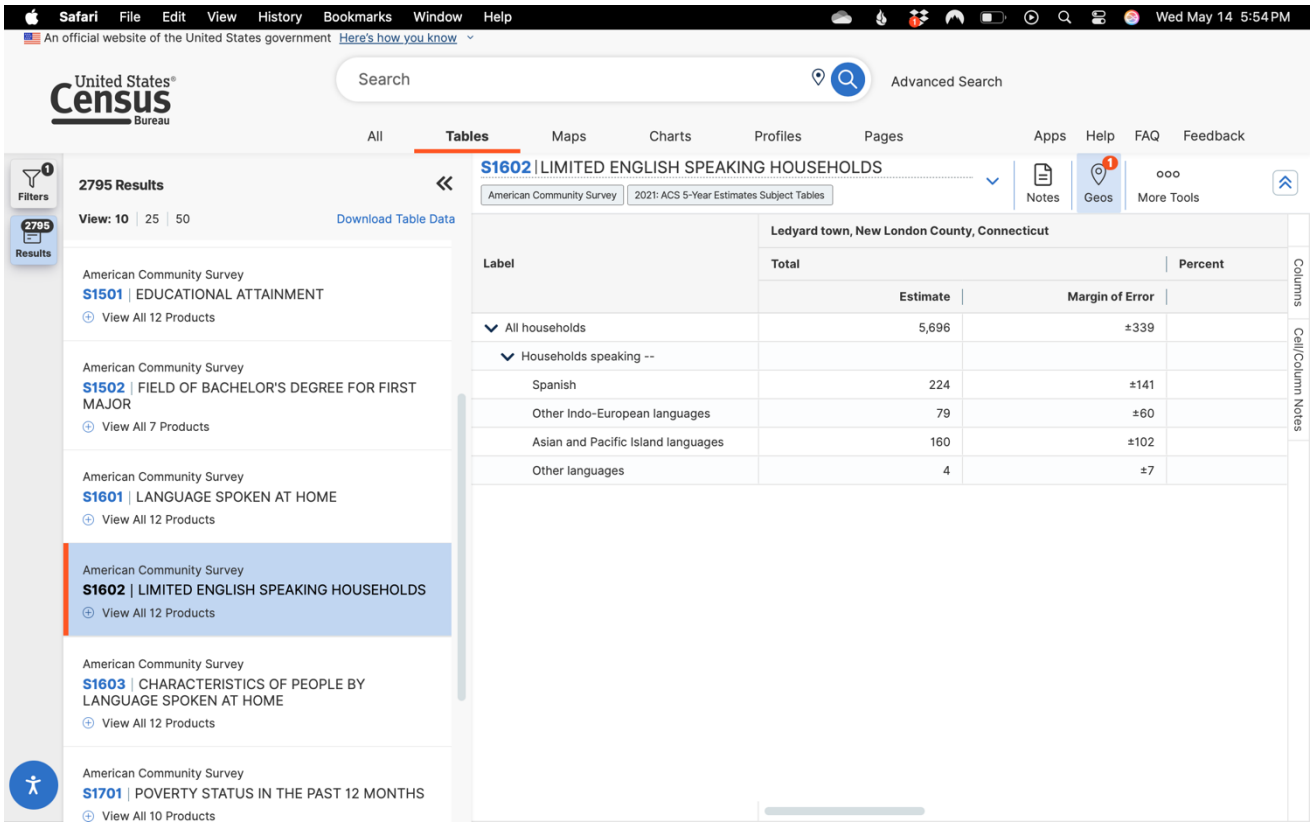
Chief Elected Official Date

Attachment 8-5