

RESOLUTION R-2014-285

WHEREAS, it is the public policy of the County of Lawrence to promote the opportunity for full participation by 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, and;

WHEREAS, the County of Lawrence desires to approve the Lawrence County Four-Factor Analysis to serve as a guide for determining which language assistance measures Lawrence County will undertake to guarantee access to the Lawrence County Community Development Block Grant (CDB) programs by LEP persons.

NOW, THEREFORE IT BE RESOLVED BY THE LAWRENCE COUNTY COMMISSIONERS, that the Lawrence County Board of Commissioners approve the Four Factor Analysis and based off of this analysis Lawrence County in not required to develop a Language Access Plan.

APPROVED this 16th day of December, 2014

VOTE: Yeas 2 Nays 0

CERTIFIED this 16th day of December, 2014



James Gagliano, Jr.
Chief Clerk/County Administrator

**FOUR FACTOR ANALYSIS AND LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH
PROFICENY PERSONS
COMMUNITY DEVELOPMENT BLOCK GRANT
LAWRENCE COUNTY**

PURPOSE: In compliance with Executive Order 13166, Lawrence County 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 prohibitions 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.

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

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

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

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, and;

The proposed project is a street improvement 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.

The proposed project does provide direct assistance to project area beneficiaries related to housing rehabilitation and street improvements; 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, 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 Lawrence County.

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

Chief Elected Official



Date

12-16-2014