

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

**COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM**

TOWN OF BRONSON

Purpose: In compliance with Executive Order 13166, the Town of Bronson 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 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 Bronson Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the Town of Bronson will undertake to guarantee access to the Town of Bronson 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).

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 No LEP households located in the proposed project area. This does not represent a threshold population of LEP residents.

The Town of Bronson utilized American Community Survey data Table(s)#S1602. Based on this data, the Town of Bronson does meet the 1,000 or 5% LEP persons threshold for the Spanish Language.

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

The proposed project does include internet 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 internet hookups; 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 Bronson.

**Town of Bronson
Language Access Plan**

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

- *All CDBG citizen participation documents, project-related resolutions, public notices, and amendments will be published in Spanish on bulletin boards at the Town Hall 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 Spanish indicating other program materials are available in Spanish 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.*
- *If other populations of LEP persons are identified in the future, The Town of Bronson will consider additional measures to serve the language access needs of those persons.*

Adopted:

Date Adopted

Attest

Chief Elected Official

ADOPTING RESOLUTION

The Town Council of the Town of Bronson, at a public meeting held on the 16th day of February, 2021, all members having voted affirmatively for the adoption and execution of the within “Four-Factor Analysis” does hereby adopt, confirm and

ratify same and authorize its duly appointed agents and representatives to submit same in connection with an application to secure State funding for improvements beneficial to the public health, welfare, education and prosperity.

IN WITNESS WHEREOF, this resolution was read aloud and adopted by voice vote as appears in the duly recorded minutes of said meeting.

DEPUTY TOWN CLERK