

Four Factor Analysis

And

Language Access Plan

For Limited English Proficiency Persons

Community Development Block Grant Program, Emergency Solutions Grant Program, and HOME Investment Partnership Program

COUNTY OF ADAMS

Purpose: In compliance with Executive Order 13166, the County of Adams 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.

The County of Adams Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the County of Adams will undertake to guarantee access to the County of Adams Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership (HOME) 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 subrecipient if the person received education and outreach in the subrecipient-provided sufficient language services).

The County of Adams utilized Census 2010 Special Tabulation 194 and Table 4, Table 4, Language Spoken at Home and Ability to Speak English for Populations 5 Years and Over. Based on this data, the County of Adams does meet the 1,000 or 5% LEP persons threshold for Spanish or Spanish Creole.

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

The proposed CDBG projects consist of waterline replacements in Aspers Village, the Healing HeARTS public service program for senior citizens at the Adams County Arts Council, ADA improvements at the United Way building in Gettysburg, and curb cuts in Bendersville Borough. The public service activities do provide direct assistance to individuals, but the construction projects do not. LEP persons could possibly come into contact with the CDBG program through the public service activities. All citizen participation activities are open to the general public. All Public Notices are on the Adams County website which has a translation capability.

The ESG project consists of homelessness prevention and operational costs of the Adams County Homeless Shelter. The project provides direct assistance to homeless individuals, and LEP individuals could possibly come into contact with the ESG program. All citizen participation activities are open to the general public. All Public Notices are on the Adams County website which has a translation capability.

The HOME program is not currently in operation. As a result, LEP persons will not come into contact with the HOME program. All citizen participation activities are open to the general public. All Public Notices are on the Adams County website which has a translation capability.

Organizations obtaining CDBG, ESG, and/or HOME funds shall take reasonable steps to ensure meaningful access to their programs and activities by individuals with limited English proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary.

Because of the high number of Spanish-speaking individuals and families in our community, documents listing participant regulations and requirements (such as Shelter Handbooks, Rapid Rehousing Requirements, Lead-Based Paint Notices, etc.) should also be printed in Spanish as well as English.

Grantees must follow the requirements outlined in 24 CFR §576.407(b). HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons in the Federal Register on January 22, 2007.

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

Some of the proposed projects provide direct assistance to individuals. In these cases, LEP persons may come into contact with the programs. All citizen participation activities are open to the general public, and organizations receiving CDBG, ESG, and/or HOME funds shall take reasonable steps to ensure meaningful access to their programs as highlighted above.

4. The resources available and costs to the recipient.

The Public Notices for CDBG, ESG, and HOME programs are posted on the County website and advertised in the Gettysburg Times. They are also posted at the offices of South Central Community Action Programs, Inc., the County's largest service provider for homeless and low-moderate income County residents. These Public Notices can easily be accessed in Spanish on the County website by utilizing the translation feature provided on the homepage. Documents pertinent to individuals in the care of subrecipients shall be printed in Spanish as well as English. Language assistance services, including oral and written translation, shall be made available when necessary.

Language Access Plan: As a result of the preceding Four-Factor Analysis, the County of Adams has identified the types of language assistance to be provided on an as needed basis by the County of Adams throughout the implementation of the CDBG, ESG, and HOME Programs.

- All CDBG, ESG, and HOME citizen participation documents, project-related resolutions, public notices, and amendments will be published on the Adams County Website, which includes a translation service that easily translates the full document into Spanish. Also, all published/posted citizen participation notices include a statement in Spanish indicating that program materials are available in Spanish upon request, a statement in Spanish that translators will be available at citizen


participation meetings upon at least 72 hours' notice, and a notification in Spanish of the availability of translated documents through the translation feature on the County's website.

- If needed, a translator may be retained to provide oral translation in the field during implementation of the project or for income surveys. The County will provide translation through County employees and Housing Board members that are proficient in Spanish, and/or request assistance from Manos Unidas (the County's Hispanic-American Community Services center), and Spanish-speaking employees from South Central Community Action Programs, Inc. All public notices of income surveys and the income survey itself will be provided in Spanish as needed.
- If other populations of LEP persons are identified in the future, the County of Adams will consider additional measures to serve the language access needs of those persons.


Vital Document Translation: The Adams County Office of Planning and Development will post translated documents relating to its grant-funded projects on the County website as needed.

Requests for translation or interpretation services should be directed to Rob Thaeler, Title VI Compliance Officer, at rthaeler@adamscounty.us or Rebecca Moreland, Grants Program Coordinator, at rmoreland@adamscounty.us. Either can also be reached by telephone at 717-337-9824 or by mail by writing to the Adams County Office of Planning and Development, 670 Old Harrisburg Road, Suite 100, Gettysburg, PA 17325.

Adopted:



Paula V. Neiman, Chief Clerk



Randy L. Phiel, Chairman
Adams County Commissioners

10-24-2018

Date