

**Four-Factor Analysis and
Language Access Plan for
Limited English Proficiency Persons**

**City of Torrington
Small Cities CDBG Program**

TITLE VI FOUR-FACTOR ANALYSIS

Background and Purpose: 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.

In compliance with Federal Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", the City of Torrington has developed the following Four-Factor Analysis and Language Access Plan (LAP) for Limited English Proficiency (LEP) persons.

Factor One: Number or proportion of LEP persons served or encountered in the City of Torrington.

The U.S. Justice Department has recommended the following threshold criteria to identify LEP populations among persons aged 5 years and older. This method utilizes data from the U.S. Census Bureau – language spoken at home, and ability to speak English. For this group to qualify as LEP, they must:

- Constitute at least 5% of the total population; OR
- Number at least 1,000 persons

The following shows the languages as reported in the 2018 U.S. Census data:

City of Torrington – Population 34,737		
Language	# Limited English Proficiency	% Limited English Proficiency
Spanish	1,147	3.5%
Other Indo-European Languages	498	1.5%

Asian & Pacific Islander Languages	309	0.9%
Other Unspecified Languages	55	0.2%

Source: US Census Bureau, American Community Survey, 2018 5-Year Estimates, Table DP02

Factor Two: The frequency with which LEP persons come into contact with the city's programs, activities and services.

The proposed project provides shelter diversion services and housing assistance, and therefore residents may have direct contact with program staff.

Factor Three: The nature and importance of the program, activity or service provided by the City of Torrington to LEP persons.

The proposed project provides housing assistance and supports to beneficiaries, and by its very nature is of significant importance to its beneficiaries.

Factor Four: The resources available to the City of Torrington, and overall costs to provide LEP assistance.

In the event that a service is required beyond the assistance provided by staff, the City will seek to provide language assistance as needed. Internet sites can be utilized to translate some written materials; common forms used to implement this project will also be available in other languages on DOH website. Foreign language services, including translation, can be directed to available bilingual staff; local volunteers can be identified to provide oral translation services at public meetings and during conversations with LEP residents during the project's implementation. Translation activities are an eligible CDBG administrative expense, and the City (and program) will secure additional translation supports as needed over the course of the project period.

LANGUAGE ACCESS PLAN

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

1. Identifying LEP Individuals

LEP persons have been identified according to the Four-Factor Analysis. Based on 2018 Census Bureau data, approximately 1,100 persons who are primary Spanish-speaking also speak English less than “very well”. The following will assist in identifying LEP individual that needs language assistance:

- Requests for assistance will be documented by City of Torrington staff to help define current and future needs
- Interpreter or translation services will be provided, upon prior request, for public meetings
- City of Torrington will share relevant information with local organizations that serve LEP persons in the region

2. Language Assistance Measures

- Upon receiving a request for interpreter or translation services, staff will take the contact information of the LEP person and make arrangements for language assistance
- Notice of available assistance is posted on meeting notices
- The City will translate any published documents in another language upon request

3. Providing Notice to LEP Persons

All public meeting agendas contain a notice to contact City Hall if assistance is needed. If other populations of LEP persons are identified in the future, the City of Torrington will consider additional measures to serve the language access needs of those persons.

ADOPTED:

Signature of Chief Elected Official

Date

ATTEST _____