

**FOUR-FACTOR ANALYSIS FOR  
LIMITED ENGLISH PROFICIENCY PERSONS**  
**Community Development Block Grant Program (CDBG)**  
**2019 Small Cities Application for Fire Protection Equipment**

**PURPOSE**

In compliance with Executive Order 13166, the Town of Mansfield 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 based on 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 MANSFIELD FOUR-FACTOR ANALYSIS**

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

The Town of Mansfield utilized Census 2018 American Community Survey, Table DP05, Profile of General Demographic Characteristics. Based on this data, the Town of Mansfield does meet the 1,000 or 5% LEP persons threshold for the Spanish and Chinese languages.

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

The proposed project is the purchase of fire equipment 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 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.

**4. The resources available and costs to the recipient.**

Currently, internet sites can be utilized to translate some written materials. Additionally, Town staff can use Google Translate 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. Other limited LAP measures are reasonable given the resources available to the Town of Mansfield.

**CERTIFICATION**

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



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John Carrington  
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Town of Mansfield

May 21, 2020



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May 21, 2020  
Date