



Lake County
Department of Housing & Community
Development Division
Language Assistance Requirements

IN FULFILLMENT OF THE REQUIREMENTS FOR A COMPLETE CDBG-CV APPLICATION RELATING TO
THE ADMINISTRATION OF GRANT PROGRAMS PROVIDED BY
THE FLORIDA DEPARTMENT OF ECONOMIC DEVELOPMENT

2021



Este documento está disponible en español en (insert how to access a copy online in Spanish).

Describe the Outcomes of the Four Factor Analysis

Lake County's Department of Housing & Community Development Division (the Department) has conducted the Four Factor Analysis to determine the relative presence of Individuals with limited English proficiency (LEP). Individuals with LEP include anyone whose primary language is not English, and who have a limited ability to read, write, speak or understand English. The Four-Factor Analysis is the first step in developing a Language Access Plan, which is the Department's policy for providing language assistance services to County residents with LEP who may be eligible to participate in the CDBG and/or HOME Programs. Lake County is an urban county entitlement through the U.S. Department of Housing & Urban Development (HUD) and periodically applies for funding from the Florida Department of Economic Development, both of which require the County to have a current Language Access Plan.

The Four Factor Analysis identifies the following:

1. The number or proportion of Individuals with LEP served or encountered in the eligible service area (including persons who would be served or encountered if the persons received adequate outreach and the County's CDBG and HOME Programs provided sufficient language services)
2. The frequency with which Individuals with LEP come into contact with agencies, divisions or sub-recipient organizations which receive CDBG and/or HOME funds from the County
3. The nature and importance of the program, activity, service, or information provided by agencies, divisions or sub-recipient organizations which receive CDBG and/or HOME funds from the County, and
4. The cost to provide the needed language assistance services to potentially eligible CDBG and/or HOME beneficiaries.

The intent of this analysis is to find a balance that ensures meaningful access to critical services by eligible residents who are LEP while not imposing undue financial burden on the County's CDBG and HOME Programs. Each of these factors is analyzed below.

Factor 1 – Number or proportion of Individuals with LEP served or encountered in the eligible service area (including those persons who would be served or encountered if the persons received adequate outreach and the County's CDBG and HOME Programs provided sufficient language services)

The 2015 American Community Survey (ACS) data provides reports on the characteristics of County residents by language spoken at home and the ability to speak English, as detailed below.

Table 1 Language groups requiring the translation of vital documents

Population in Lake County age 5 and over	294,600	
Total LEP population 5 years of age and over	12,746	4.3%
Spanish-speaking population	229,025	9.9%
Spanish-speaking population that speaks English less than "very well"	9,813	3.3%

Source: ACS 2015 (S1601, B16001)

Based on the 2015 ACS data, native Spanish-speakers are the only group to meet the threshold of at least 1,000 among the population or 5% of the population. The Federal Register Notice published January 2007, which details guidance for conducting the Four Factor Analysis, provides that written translation is required when 1,000 persons or 5% of the eligible population, are considered LEP. The eligible population are persons served or likely to be directly affected by the Department’s CDBG and/or HOME Programs.

The following table lists the ten most common languages spoken among Individuals with LEP in Lake County. The January 2007 Federal Register Notice also provides that when fewer than 1,000 persons *and* fewer than 5% of the eligible population are considered LEP, no written translation is required. As a result, written language assistance will include Spanish translation of vital documents. Oral interpretation shall be made available to all persons that request it, regardless of language spoken.

Language	#	%
Spanish	9,813	3.33%
French Creole	580	0.20%
French (incl. Patois, Cajun)	356	0.12%
Chinese	325	0.11%
Portuguese or Portuguese Creole	268	0.09%
Vietnamese	223	0.08%
Hmong	173	0.06%
Tagalog	113	0.04%
Gujarati	106	0.04%
Japanese	99	0.03%

Source: ACS 2015 (S1601, B16001)

Factor 2 – The frequency with which Individuals with LEP come into contact with agencies, divisions or sub-recipient organizations that receive federal CDBG and/or HOME funds from Lake County.

To determine the frequency with which Individuals with LEP come into contact with agencies, divisions or sub-recipient organizations that receive CDBG funds, the Department invited representatives from the various Human Services Departments, the Section 8 Public Housing office and Mid-Florida COC to a meeting. At the meeting, participants were asked about how they:

- Encountered Individuals with LEP
- Marketed their programs and services to Individuals with LEP and neighborhoods known to have clusters of residents with LEP
- Communicated with Individuals with LEP, and
- Addressed providing language assistance needs to Individuals with LEP

The Housing and Community Development Division held a public meeting on March 11, 2021. Several stakeholders who are CDBG subrecipients participated in the meeting and provided the following information relative to the frequency with which their organizations come into contact with persons with LEP:

- Rural County residents and Spanish-speaking immigrants are primarily the LEP groups encountered
- Encounters generally occur when services are sought, such as health care, applying for housing assistance, etc.
- No specific numbers were provided by participants

Factor 3 – The nature and importance of the program, activity, service, or information provided by agencies, divisions or sub-recipient organizations which receive CDBG funds.

The services provided by the Department and sub-recipient agencies are important as they relate to a client’s need for or continued provision of services. Such services could be significant to improving the quality of life for residents such as housing rehabilitation to maintain and preserve their homes; payments for rental assistance to maintain stable housing; access to food pantries, employment training, youth programs, and much more.

Based on the comments received from the March 11, 2021 public hearing, many stakeholders reported they encountered persons with LEP when services are sought, such as health care and applying for housing assistance—both critical services, among others, for which language assistance is required.

Factor 4 – Factors 1-3 are then balanced against the available resources and costs to the Lake County CDBG and HOME Programs

For Spanish-speaking populations, the Department evaluated the cost effectiveness of translating and publishing every vital document and communication to these languages. Lake County maintains a contract with **International Communication Solutions, LLC** which provides written translation materials on a cost-per-hour basis. To translate any written, online or recorded document, the cost for Spanish was a Blended Hourly Rate of \$17.50 during normal working hours and \$19.50 for outside normal working hours. This is in addition to the cost to publish the notices in the newspaper.

To publish one Notice of Public Display for a Consolidated Plan and Annual Action Plan in English in the Daily Commercial, the Department spends \$503.68. Two public notices are required each year for the AAP, one is required for the CAPER, and notices are also required for Substantial Amendments to the AAP.

To publish the notices in English and translate and publish in Spanish, the Department will expend a minimum of **\$1,208**.

The Department has determined that due to the high cost of publication and translation of full documents, its resources would be better spent to translate brief summaries of documents such as the Consolidated Plan and CAPER and distribute to agencies such as:

- United Way of Lake and Sumter County
- Lake Cares
- Salvation Army

- Lake Community Action Agency
- Mid Florida Homeless Coalition

The Department shall provide written translations of vital documents, which includes the Citizen Participation Plan, Language Access Plan, public notices for the Consolidated Plan, Annual Action Plan, and CAPER, marketing materials, applications, notification letters, denials and appeal notices.

The Department has identified the following costs associated with translation and other language assistance services:

Language Service	Cost
Translation of flyers and social media:	\$1,750
Publication of public notices in characters	\$100
Oral Translation	\$1,050
Translation of Web Content	\$3,500
Translation services at public hearings (upon request)	\$117

Describe the Methods used to Solicit Participation of Low- and Moderate-Income Persons

Representatives of agencies who serve low- and moderate-income persons were contacted and asked to share the information to encourage participation.

Denote any Adverse Comments/Complaints Received and Describe Resolution

There were no adverse comments nor complaints received. Generally, the response was positive that the county was taking this matter seriously and creating a plan.

If No Comments were Made by the Residents During the Public Hearing, Describe the Efforts to Obtain Input from Residents on the Project

Additional outreach was conducted with local governments to solicit input on needs of residents.

Required Documentation Included on the Following Pages

Copy of Advertisements of Public Hearing Notice

Copy of Publishers' Affidavit

Copy of Minutes of the Hearing

Copy of Sign-in Sheet for the Hearing

Copy of Four Factor Analysis

Please upload the following if applicable/available:

Copy of response(s) to comments or complaints

Copy of Language Access Plan