

**FOUR-FACTOR ANALYSIS
FOR LIMITED ENGLISH PROFICIENCY
PERSONS**

**COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM**

MARTIN COUNTY

Purpose: In compliance with Executive Order 13166, Martin County has developed the following Four Factor Analysis 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.

Martin County Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures Martin County will undertake to guarantee access to the Martin County 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).

Response: Martin County utilized American Community Survey data within the 2019 5-Year Language Spoken at Home for the Population 5 Years and Over table (C16001). The following people speak English less than "very well" in Martin County:

Language Group	Speak English Less than "Very Well"	Percent of Population
Spanish	6,843	4.5%
French, Haitian, or Canjun	318	0.2%
German or other West Germanic languages	160	0.1%
Russian, Polish, or other Slavic languages	131	0.1%
Other Indo-European languages	526	0.3%
Korean	0	0%
Chinese (including Madarin, Catonese)	159	0.1%
Vietnamese	35	0.0%

Tagalog (including Filipino)	96	0.1%
Other Asian and Pacific Island languages	98	0.1%
Arabic	0	0%
Other and unspecified languages	163	0.1%

Based on this data, no language group exceeds 5% of Martin County's population.

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

Response: The proposed project will provide job training and other learning opportunities for LEP persons, among many Martin County residents, on an ongoing basis.

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

Response: The pandemic has highlighted a desperate need to reeducate or up-skill the existing and entering workforce in Martin County. Martin County seeks to rehabilitate Building 17 at Witham Field to operate as a Learning Center, with job training and other educational opportunities available from Indian River State College. Low- and moderate-income individuals are the target audience for this training, including LEP persons.

4. The resources available and costs to the recipient.

Response: Martin County provides translation services for all public notices. Additionally, Martin County uses the Language Line Solutions service to provide translation services to communicate with LEP residents. Martin County is also proposing to conduct English as a Second Language courses at the training center. Therefore, these limited LAP measures are reasonable given the resources available to Martin County.

Once the Four-Factor Analysis has been completed, the community must determine if a LAP is required.

If the community determines that a LAP is **not** required, then the certification below should be signed and dated by the chief elected official and the Four-Factor Analysis should be kept in the Fair Housing and Equal Opportunity CDBG program file.

If the Four-Factor Analysis identifies a LEP threshold population and/or if the nature of the program activities is such that a LAP is triggered, please delete the certification below and complete the LAP section at the end of this sample document.

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

ATTEST:

BOARD OF COUNTY COMMISSIONERS
MARTIN COUNTY, FLORIDA

CAROLYN TIMMANN, CLERK OF THE
CIRCUIT COURT AND COMPTROLLER

STACEY HETHERINGTON, CHAIR

APPROVED AS TO FORM & LEGAL
SUFFICIENCY:

SARAH W. WOODS, COUNTY ATTORNEY