

LEXINGTON HOUSING COMMUNITY DEVELOPMENT CORPORATION

Four Factor Analysis

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with limited English proficiency (LEP persons). The Lexington Housing Community Development Corporation (LHCDC) is a recipient of federal funds for a portion of its programs through the North Carolina Housing Finance Agency (NCHFA) and thus obligated to reduce language barriers that can preclude meaningful access by LEP persons to LHCDC's programs.

For the purposes of this plan:

- a) *Recipient* means the entity designated as a recipient for assistance with federal funding. This is any entity which receives federal assistance, directly from NCHFA or from another recipient. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, private agency or institution, builder, property manager, residential management corporation, or cooperative association.
- b) *LEP* means Limited English Proficiency.
- c) *Limited English Proficiency person*, as defined in the 2000 U.S. Census, is any individual who speaks a language at home other than English as their primary language, and who speak or understand English "not well" or "not at all".

Analysis

LHCDC conducted a four factor analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Agency or its federally funded programs, (2) frequency with which LEP persons come into contact with Agency's program, (3) nature and importance of the program, activity, or service to people's lives, and (4) resources available and costs. Per the 2015 American Community Survey One Year Estimate, approximately 5.9 % of Davidson County's population speaks Spanish at home, and approximately 2.9% of Davidson County's population is Spanish speaking with limited English proficiency at home. No other ethnicity has a sizeable limited English proficient population. Approximately 91.2% of Davidson County's population speaks only English at home.

Typically LHCDC sees no more than 1 to 3 LEP persons through its programs per year. In situations where funds benefit a Limited English Proficiency household, LHCDC can assist in securing those funds by being the primary contact for an individual and the lender assisting the household.

LHCDC does not provide any direct service or program that provides immediate or emergency assistance such as medical treatment or food provision. LHCDC's programs strive to provide single-family housing as well as housing repair/rehabilitation. Delay of access would not unduly harm LEP person. Its single family housing programs serve individuals through LHCDC's partners. Based on a cumulative analysis of our programs, the main non English speaking group that uses our programs is Hispanic.

Types of language assistance to be provided by NCHFA

In response to the significant Spanish-speaking populations in North Carolina, LHCDC can provide Spanish versions of its vital documents and program brochures. In addition, LHCDC has a staff member who is bilingual in English and Spanish who can translate if needed. If other significant populations of LEP persons are identified in future Census data, LHCDC will consider additional targeted measures to serve the needs of those populations.

Evaluation

LHCDC will update its Four Factor Analysis, making revisions to policies and procedures as may be required periodically. LHCDC staff will also be trained on LEP policies and procedures.

LHCDC's Four Factor Analysis is available to the public. The information will be made available in a form accessible to persons with disabilities upon request to LHCDC, 21 W. 2nd Street, Lexington NC 27292, Tel (336) 236-1675.

Citizens, public agencies, and other interested parties will have reasonable and timely access to information and records relating to the Four Factor Analysis. All records which are public under G.S. 132 will be made accessible to interested individuals and groups during normal working hours.

At any time, citizens may submit complaints related to the Four Factor Analysis by contacting the Agency's LEP contact person: Miriam Esquivel at miriam@lexingtoncdc.com

LHCDC will provide a written response to every written complaint that relates to the Four Factor Analysis within 15 days.