



**Metropolitan Development and Housing Agency  
(MDHA)**

**2017 - FOUR-FACTOR ANALYSIS  
FOR LIMITED ENGLISH PROFICIENCY  
PERSONS**

**Metropolitan Government of Nashville and  
Davidson County**

**Purpose:** In compliance with Executive Order 13166, the Metropolitan Government of Nashville and Davidson County developed the following Four Factor Analysis for Limited English Proficiency (LEP) persons to be used in conjunction with MDHA’s Language Assistance Plan for The United State Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) programs.

**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 with limited English proficiency can effectively participate in or benefit from federally assisted programs may violate Title VI’s prohibition against national origin discrimination.

As a result of national origin, people who 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 to receive a particular service, benefit, or encounter.

**Four-Factor Analysis:** The following Four-Factor Analysis will guide determining which language assistance measures the MDHA will undertake to guarantee access to the CPD 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).

MDHA utilized American Community Survey 2014 data drilled down to Davidson County, Tennessee when the 2018-2023 Consolidated Plan was developed to determine the language groups that would qualify as LEP that met the 1,000 or 5% LEP person threshold. These populations and the corresponding #s are listed in the table below:

Location	Total	Spanish or Spanish Creole	Chinese	Vietnamese	Arabic	African langs. Somali
2014 Data Davidson County, Tennessee	602471	28078	1001	1733	4582	1915

All public hearing notices have included information in the languages listed above stating the following:

Request for Accommodations: MDHA makes every effort to provide reasonable accommodations to assist persons with disabilities. Any person needing assistance in accessing this information or who has other needs that require special accommodations may contact 615-252-8562 or TDD at 615-252-8599.

Para asistencia en Español llame al 615-252-8505. - *Spanish*

如果需要本通知的中文翻译 · 请打电话 615-252-8505 - *Chinese*

Để nhận một bản dịch Tiếng Việt của thông báo này, vui lòng gọi: 615-252-8505 - *Vietnamese*

615-252-8505 - الإلتصال يرجى، نايلا لهذا عربية ترجمة على للحصول: *Arabic*

Haddii aad rabto qoraalkan oo af-Soomaali lagu tarjumay haddii aad doonayso fadlan naga soo wac: 615-252-8505 – *Somali*

Statement of Non-Discrimination: MDHA does not discriminate on the basis of age, race, sex, sexual orientation, gender identity, genetic information, color, national origin, religion, disability or any other legally protected status in admission to, access to, or operations of its programs, services, or activities

MDHA will periodically review population data to ensure all LEP populations are identified.

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

MDHA started keeping records of the requests for language assistance received via language lines in 2020. It is anticipated that LEP persons will most likely seek services through the CDBG-funded housing rehabilitation program.

Numbers for assistance via the language lines for 2022

<u>Language</u>	<u>Number of calls</u>	<u>Minutes of use</u>
Spanish	12	325
Arabic	6	86
Haitian Creole	2	122
Somalian	1	5
Mandarin	1	13

2021

<u>Language</u>	<u>Number of Calls</u>	<u>Minutes of Use</u>
Spanish	6	80
Arabic	3	66

<i>2020</i>		
<u>Language</u>	<u>Number of Calls</u>	<u>Minutes of Use</u>
Spanish	3	27
Arabic	2	52
Mandarin	2	15

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

Some CPD-funded activities directly benefit program beneficiaries. Programs with direct benefits would have significant importance to LEP individuals. Therefore, MDHA will follow the procedures outlined in the attached Limited English Proficiency Policy to aid LEP individuals when providing assistance through these programs.

4. The resources outlined in the Limited English Proficiency Policy will be available and provided at no cost to LEP recipients.

## *Limited English Proficiency Policy*

MDHA will provide interpretation services for persons with Limited English Proficiency (LEP). Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be LEP. These persons are entitled to language assistance to allow equal opportunity for them to participate in programs and services.

The type of assistance provided will depend upon the:

- The size of the LEP population to be served or likely to be served
- The frequency in which the particular language is encountered when providing service.
- The nature of the importance of the program or activity provided to the person receiving the service.
- The resources available and the cost associated the service.

Based upon the LEP analysis, MDHA provides LEP services in the following manner:

1. MDHA has contracted with trained interpreters to provide services to applicants/clients on-site for the most frequently requested language.
2. MDHA has contracted with Language Line Services to provide interpretation telephone interviews and written translation service.
3. Information of availability of language interpretation is displayed for the general public in the areas most frequently requested for service.
4. All staff members are trained on the use of the Language Line Service.
5. LEP persons are free to decline service and request the use of family members and friends. If services are offered and declined the LEP person should sign the agency waiver. Even if the LEP person arrives with an interpreter, the agency staff should offer the services of a trained interpreter to insure accurate interpretation.
6. MDHA has established the standard that trained interpreters must be competent in English and the specialized language they are interpreting. The interpreter must understand and demonstrate knowledge in specialized program terms, concepts and rules, show sensitivity to the LEP person's culture and demonstrate the ability to convey information in both languages accurately. They must understand the issues of confidentiality.
7. MDHA will translate frequently requested and used forms, applications letters, correspondence and other materials in languages most frequently used by LEP persons. Translation will be based upon level of contact and services provided to persons with LEP.
8. MDHA will perform a yearly assessment to determine the type of service to be provided to persons with LEP.
9. MDHA will provide easily accessible methods of notification of interpretation services. The use of language identification will be used to provide translation service.

10. Agency publications will include information on free interpretation services.
11. MDHA will make every attempt to provide interpretation services in a timely manner. MDHA will not deny service to any person due to language interpretation or translation problems. Translation services will be provided at no cost to the person with LEP.

**Supplemental 4-Factor Analysis Completed for CDBG-DR funding in January 2023 for MID 37211 prior to initiating community outreach**

The CDBG-DR funding allocated to Metro Nashville-Davidson County in 87 FR 31636 and 88 FR 3198 stated that funds be expended in the Most Impacted Distressed Area, which was identified in a HUD memorandum dated March 2022 as ZIP Code 37211. MDHA reviewed Census Data for this ZIP Code and determined that Spanish was the only LEP population that exceeded the 5% safe harbor guidelines. See attached.

Even though the CDBG-DR funds were to be expended solely in the 37211 MID, MDHA ran all public hearing notices with the 5 languages identified in this 4-factor analysis.

Additionally, the public hearing notices were published in the Azul Spanish newspaper (proof of publication is attached), and MDHA hired a Spanish Translator to attend and provide translation during each CDBG-DR public hearing.

**Additional outreach efforts are outlined below:**

- Public Notices published in the Tribune (a minority-owned paper)
- Contact and communication with Conexion America and the Hispanic Family Foundation, which serve a large majority of Nashville's Hispanic and Immigrant population, who also assisted with outreach and translation. Conexion America allowed us to use their facility to hold the public hearing.
- Worked with the following Metro Council Members to help get the word out about our public meetings and CDBG-DR funding:
  1. Ginny Welsch
  2. Colby Sledge
  3. Courtney Johnston
  4. Bob Nash
  5. John Rutherford
- Ran a CDBG-DR survey from Jan. 4 to Jan 31 – and results are listed below:

Here is a link to the survey: <https://www.surveymonkey.com/r/CDBG-DR23>

Results: [https://www.surveymonkey.com/results/SM-Lq1NM2Mff0UqfP5fcEj\\_2F9w\\_3D\\_3D/](https://www.surveymonkey.com/results/SM-Lq1NM2Mff0UqfP5fcEj_2F9w_3D_3D/)

- Reach: 724
- Link clicks: 103
- Post engagement: 122

- Conexion Americas shared e-announcements in Spanish
- The survey was posted on Instagram, LinkedIn and Twitter.

**Facebook (Posted Jan. 4, advertisement ran from Jan. 4 to Jan. 31)**

- Post impressions: 7,847
- Post reach: 1,378 (post and ad)
- Post engagement: 312 (post and ad)
- Link clicks: 103

**Instagram (Jan. 4)**

- Post impressions: 276
- Post reach: 248

**Twitter (Jan. 4)**

- Post impressions: 147
- Post engagement: 5

**LinkedIn (Jan. 4)**

- Post impressions: 107
- Engagement rate: 2.8%
- Click-through rate: 1.9%