## CITY OF BRADFORD LANGUAGE ACCESS PLAN CERTIFICATION

In compliance with Section 601 of Title VI of the Civil Rights Act of 1964 (LEP Statutory Authority) and Executive Order 13166, the City of Bradford has conducted the following Four Factor Analysis for Limited English Proficiency (LEP) Persons for the Community Development Block Grant (CDBG) Program and other federal programs that require compliance with the above-referenced Title VI and Executive Order 13166.

The City of Bradford has performed the following Four-Factor Analysis for determining which language assistance measures it will be required to undertake to guarantee access to the City's CDBG Program and other federal programs that required compliance for LEP persons.

**Factor One** – The City of Bradford has analyzed the number or proportion of LEP persons served or encountered in the City (program service area) population. Served or encountered includes those persons who would be served by the program or activity if the person received education and outreach and the City provided sufficient language services. The City of Bradford utilized the PA Census tabulation for persons that speak English "Less than Well" provided by the PA Department of Community and Economic Development (DCED) to determine its LEP population. Based upon this data, the City of Bradford **does not** meet the 1,000 or 5% LEP threshold for any language (s) identified as its percentage of population that speaks English "Less than Well" is .4%.

*Factor Two* – The City of Bradford does provide direct assistance to residents through its housing rehabilitation program. Therefore, residents are likely to have considerable contact with City CDBG Program staff.

**Factor Three** – The CDBG Program also requires that citizen participation activities be open to the general public and every effort should be made to provide LEP persons with needed materials as needed.

**Factor Four** - Use of available materials and resources to provide LEP persons with written materials and oral translation as needed.

As a result of the Four Factor Analysis, the City of Bradford will provide the following types of language assistance to LEP persons:

- 1. All public notices of income surveys and the income survey itself will be in the Identified LEP language (s) as needed.
- 2. All direct assistance program application documents and outreach materials will be provided in the identified LEP language (s) as needed.

- 3. For income surveys in service areas meeting the threshold of LEP or/direct assistance intakes, if needed, a translator will be retained to provide oral translation at the site of the income survey or intake to assist in filling out the survey/intake documents and explaining the program. The City will not require the LEP applicant to provide their own translator, though the LEP applicant may bring someone if they choose.
- 4. Should a population of LEP persons be identified in the future, the City will provide additional measures to serve the language access needs of those persons.

Adopted:

September 27, 2016

Tom Riel, Mayor of the City of Bradford

Date

City of Bradford CDBG Program

Attest: Teri Cannon, City Administrator

Grantee Name & Program