

# CITY OF DEARBORN

## ECONOMIC DEVELOPMENT DEPARTMENT



### Limited English Proficiency Language Access Plan & Four-Factor Analysis

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# Limited English Proficiency (LEP)

## Introduction

*Title VI of the Civil Rights Act of 1964* (Title VI) is the federal law which 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. In addition to Title VI, *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* was established on January 22, 2007 as required by Executive Order 13166 (EO 13166). EO 13166 requires for Guidance to be published to clarify recipients' obligations to LEP persons.

## **Addressing Language Barriers - Limited English Proficiency Persons (LEP)**

The City of Dearborn will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as persons with Limited English Proficient (LEP). For the purposes of this document, Federal Community Planning and Development Programs (CPD) consists of; Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Disaster Recovery (DR).

Limited English Proficient persons are 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. For purpose of the CPD programs, LEP persons are applicants and participants, and parents and family members of applicants and participants.

The Dearborn Economic Development Department is required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the City's federal CPD programs and activities. However, HUD recognizes that some City budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the City.

## **Language assistance that the Dearborn Economic and Development might provide to LEP persons includes, but is not limited to:**

- **Oral interpretation services;**
- **Bilingual staff;**
- **Conduct special briefings in another language;**
- **Arrange for interpreter to be present at briefing;**
- **Translate written material that accompanies briefing;**
- **Allow for special staff to assist in briefing families and translating documents; or**
- **Referrals to community liaisons proficient in the language of LEP persons**

The Dearborn Economic Development Department will discuss if applicable, how families with language issues may be accommodated to ensure each family understand and receives adequate information about the CPD programs and its rules to the greatest extent possible.

Upon receiving an allocation of \$16,332,000 in Community Development Block Grant - Disaster Recovery (CDBG-DR) - The Dearborn Economic Development Department conducted the following four- factor analysis to determine which language assistance measures the City of Dearborn will undertake to guarantee access to the CDBG-DR grant program. Additional federal grant programs such as the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Shelter Grant (ESG), will provide a four- factor analysis based on their eligible service population and will include identified assistance as Amendments to this plan.

The following analysis and LAP shall provide the basis for which any LEP individuals will be given equal access to the CDBG-DR grant funds in the Presidential declared disaster FEMA 4607 which identified the entire City of Dearborn with HUD determining the Most Impacted and Distressed areas city-wide.

## Four-Factor Analysis

1. Total number or proportion of LEP persons eligible to be served or expected to be encountered within the Declared City (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 assistance).

According to the US Census Bureau 2020 American Community Survey (ACS) 5-Year estimates, the total LEP population for any given language in the City of Dearborn would exceed 1,000 people or 5% of the population. The ACS data estimates of the population five years or older who speak English "less than very well." The City of Dearborn has at minimum 48% LEP.

**FIGURE 1: 2020 ACS TOTAL PERCENTAGE of LEP POPULATION IN DEARBORN, MI**  
**Estimates of the population five years or older who speak English "less than very well."**

<b>Dearborn, Michigan 2020 American Community Survey</b>						
<b>Characteristics of People By Language Spoken at Home</b>						
	<b>Total</b>		<b>Speak a language other than English at home</b>			
<b>Label</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>Estimate</b>	<b>Margin of Error</b>
<b>Total population 5 years and over</b>	87,360	±577	45,662	±1,678	(X)	(X)
<b>AGE</b>						
5 to 17 years	20,296	±841	12,210	±950	26.7%	±1.6
18 to 64 years	54,926	±957	29,682	±1,139	65.0%	±1.6
65 years and over	12,138	±840	3,770	±482	8.3%	±1.0
<b>NATIVITY AND CITIZENSHIP STATUS</b>						
Native	59,747	±1,220	19,957	±1,234	43.7%	±1.9
Foreign born	27,613	±1,186	25,705	±1,185	56.3%	±1.9
Naturalized U.S. citizen	18,691	±1,057	17,440	±1,041	38.2%	±1.9
Not a U.S. citizen	8,922	±916	8,265	±886	18.1%	±1.9
<b>POVERTY STATUS IN THE PAST 12 MONTHS</b>						
Population 5 years and over for whom poverty status is determined	87,020	±609	45,636	±1,677	(X)	(X)
Below poverty level	21,995	±1,806	16,932	±1,806	37.1%	±3.5
At or above poverty level	65,025	±1,814	28,704	±1,710	62.9%	±3.5
<b>EDUCATIONAL ATTAINMENT</b>						
Population 25 years and over	57,010	±950	27,632	±1,127	(X)	(X)
Less than high school graduate	10,002	±816	8,310	±769	30.1%	±2.6
High school graduate (includes equivalency)	12,463	±673	6,107	±579	22.1%	±1.9
Some college or associate's degree	15,862	±893	5,725	±605	20.7%	±2.1
Bachelor's degree or higher	18,683	±997	7,490	±808	27.1%	±2.6

Of the 87,360 residents 5 years and older, 45,662 speak a language other than English at home which is roughly 48%. According to the 2014-2018 ACS data, the racial composition of Dearborn is 90.5% white which includes the Arab population. Residents of Arab ancestry made up 43,810 persons, comprising 45.2% of Dearborn's population. In Dearborn, the Arab Ancestry population concentration for the jurisdiction as a whole is 45.17%. Therefore, any census tract that has a concentration of Arab Ancestry populations at a rate of 10% higher than 45.17% would be considered a racial concentration. There are 10 census tracks with an Arab Ancestry population concentration greater than the jurisdiction as a whole.

Federal safe harbor rules suggest written translation of vital documents where the size of a language group is 1,000 or more in number or more than 5 percent of the eligible population. As shown in the Table, of the 45,662 residents who speaks a language other than English roughly 65% of them are residents ages 18 to 64 years of age.

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

The frequency with which the LEP persons come into contact with a federal CPD grant program must be considered when providing eligible activities to a defined service area. Many of the federal CPD programs and projects will require direct and effective communication between ED staff and beneficiaries. Since the percentage of residents within the City of Dearborn that speak English "less than very well" as shown above is at minimum 48%, contact with persons or households who require assistance in another language is expected to be substantial and the City of Dearborn will translate the most relevant documents and forms of its federal CPD programs in Arabic to make considerations for the second largest language group in the service area. Amendments may be translated as needed upon request. Other considerations will include a website that has both English and Arabic CPD program information.

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

The Economic Development Department has outlined several types of projects and programs to provide direct assistance to residents related to community development and housing making the nature of these activities of significant importance. Specifically, many of the community development and housing programs will necessitate direct communication and contact to area(s) residents, such as:

- Single-Family Rehabilitation
- Rental Housing Development
- First Time Homebuyer Program
- Slum and Blight Demolition (Clearance and Demolition Program) and
- CDBG Economic Development Projects

All of the programs listed above will aim to benefit low-and moderate-income individuals. Each program and activity, including those not mentioned above, will allow for citizen participation and be open for public comment. Housing programs that directly serve residents carry high importance, as they ensure access to safe and quality housing. As such, those programs for which residents apply directly and which require a financial or residency commitment by beneficiaries should be translated into the appropriate LEP Arabic language.

## 4. The resources available and costs to the recipient.

The Community Development Block Grant - Disaster Recovery Action Plan will be made available in Arabic on the City of Dearborn's disaster recovery website <https://cityofdearborn.org/disaster-recovery> . The estimated cost for the first translation of the CDBG-DR Action Plan is estimated to be around \$8000. Due to the substantial percentage of LEP Arabic populations, the Economic and Development Department will make available translated amendments to the Action Plan and other relevant documents and forms.

**Certification:** Based on the above Four-Factor Analysis, the City of Dearborn is required to develop a LAP. The City of Dearborn will make all reasonable attempts to accommodate language access needs for residents requesting written and/ or oral translations during the implementation of all federal CPD programs and projects.

## Language Access Plan

As a result of the preceding Four-Factor Analysis, the City of Dearborn is required to develop a Language Access Plan (LAP). The Economic Development Department has identified the following types of language assistance that may be provided on an as needed basis by the City of Dearborn.

- All citizens participation documents, public notices, action plans, and amendments will be published in newspapers of general circulation and on program websites such as the <https://cityofdearborn.org/disaster-recovery> website. You can also request translated CDBG-DR documents via email at [DearbornDR@ci.dearborn.mi.us](mailto:DearbornDR@ci.dearborn.mi.us).
- Additionally, all published citizen participation advertisements will include a statement in Arabic indicating other program materials will be available up request.
- All citizen participation notices will include a statement that translators will be available at public meetings upon prior request.
- Due to the nature and importance of the federal CPD programs, original program Action Plan's will be translated in appropriate LEP language and made available at public hearings and on the [cityofdearborn.org](https://cityofdearborn.org) website.
- Maintain a list of staff members proficient in languages other than English that are willing to provide interpretative services.
- For assisting LEP recipients/applicants, staff and subrecipients will have a contact and/or a staff member proficient in the needed language to provide interpretation.
- Economic Development Department will conduct periodic assessments of the LAP to ensure that population changes have not occurred supplying the need for adjustments to language assistance. The Limited English Proficiency, Language Access Plan, and Four-Factor Analysis will be published in English and Arabic and made available for citizens to view on the <https://cityofdearborn.org/disaster-recovery> website.