

**CITY OF DUNNELLON  
COUNCIL  
AGENDA SUMMARY FORM**

**Meeting Date:** August 18, 2021

**Review by City Attorney:** N/A

**Responsible Dept.:** Finance

**Department Head Approval:** Jan Smith

**Subject:** Four-Factor Analysis for Limited English Proficiency (LEP) Persons-CDBG Program

**Request for Approval Summary Explanation & Background:**

On June 23, 2021 City Council gave their authorization to move forward to apply for a Rebuild Florida General Infrastructure Grant through the CDBG disaster mitigation program to address flooding and drainage issues in Dunnellon Heights.

As a condition for grant recipients of CDBG funds the City must document that we have performed a four factor analysis to serve as the guide for determining which language assistance measures the City will undertake to guarantee access to the City's CDBG programs by LEP persons.

As a result of this analysis the City is not required to develop a language assistance plan and must certify the result to DEO.

**Fiscal Information:** N/A

**Procurement Method:** N/A

**Purchase Requisition#:** N/A

**Recommended Action:** Authorize the Mayor to certify the results of the Four Factor Analysis

**Initiated by:** JS

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

**COMMUNITY DEVELOPMENT  
BLOCK GRANT PROGRAM**

**CITY OF DUNNELLON, FLORIDA**

**Purpose:** In compliance with Executive Order 13166, the City of Dunnellon 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.

**City of Dunnellon Four-Factor Analysis:** The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the City of Dunnellon will undertake to guarantee access to the City of Dunnellon's 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).

The City of Dunnellon utilized American Community Survey data Table # S1602. Based on this data, the City of Dunnellon does not meet the 1,000 or 5% LEP persons threshold for any languages identified.

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

The proposed project is an infrastructure project that does not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the CDBG program. However, all citizen participation activities are open to the general public.

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

The proposed project does not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the CDBG program. However, all citizen participation activities are open to the general public.

4. The resources available and costs to the recipient.

Currently, there are free websites that can be utilized to translate some written materials. Additionally, local volunteers have been identified to provide oral translation services at public meetings and during conversations with LEP residents during the implementation of the proposed project. Furthermore, many of the common forms used in the implementation of a CDBG project are available in multiple languages on the HUD and DOL websites. Additionally, translation activities are an eligible CDBG administrative expense. Therefore, limited LAP measures are reasonable given the resources available to the City of Dunnellon.

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

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William P. White, Mayor

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Date