



Four Factor Analysis & Language Access Plan

FOR LIMITED ENGLISH PROFICIENCY PERSONS
CITY OF PASADENA, TEXAS

CITY OF PASADENA
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Purpose:

It is the policy of the City of Pasadena to take reasonable steps to ensure meaningful access to their programs and activities for persons with Limited English Proficiency (LEP). In compliance with Executive Order 13166, the City of Pasadena has developed the following Language Access Plan (LAP) for LEP persons. The plan will serve as a guide to ensure that staff will communicate effectively with LEP individuals, and have timely access to important programs and information.

For purposes of this plan, an LEP individual is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to effectively interact with City staff. Individuals maintain the right to self-identify as a LEP person and should not in any circumstances be expected to pay for translation or interpretation services in order to effectively communicate with staff.

Revision History:

Revision Month/Year	Resolution	Summary of Change	Reference Sections
October 2015	2015-094	Initial Adoption	
February 2020	<i>TBD</i>	Revised to include updated language and ACS Data, as well as additional sections on <i>Training</i> and <i>Evaluation</i> .	All

History:

Title VI of the Civil Rights Act of 1964 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 the 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, Executive Order 13166 directs each federal agency that provides financial assistance to non-federal entities to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

City of Pasadena Four-Factor Analysis:

The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the City of Pasadena will undertake to guarantee access to the City of Pasadena Community Development Block Grant (CDBG), HOME Investment Partnership (HOME),

Emergency Solutions Grant (ESG), Housing Choice Voucher (HCV) programs and other federally-funded 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 Pasadena utilized data provided by the U.S. Census Bureau, American Community Survey 5-Year Estimates. This data is collected in an effort to measure the current use of languages other than English. Based on this data, the City of Pasadena exceeds the 1,000 or 5% LEP person's threshold for the Spanish language and is required to provide services to Spanish-speaking persons. The following tables provide information regarding the data collected:

Language Spoken at Home for the City of Pasadena, Texas: 2018
2014-2018 American Community Survey 5-Year Estimates

Language Spoken at Home for the City of Pasadena, Texas: 2018		
Population 5 years and over	140,933	100.0%
English only	78,748	55.9%
Language other than English	62,185	44.1%
Speak English less than "very well"	33,241	53.5%
Spanish	59,126	42.0%
Speak English less than "very well"	31,708	53.6%
Other Indo-European languages	977	0.7%
Speak English less than "very well"	268	27.4%
Asian and Pacific Islander languages	1,675	1.2%
Speak English less than "very well"	1,151	68.7%
Other languages	407	0.3%
Speak English less than "very well"	114	28.0%

Source: U.S. Census Bureau, 2014-2018 5-Year American Community Survey

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over for the City of Pasadena, Texas: 2015

Universe: Population 5 years and over

2011-2015 American Community Survey 5-Year Estimates

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over for the City of Pasadena, Texas: 2015		
	Estimate	Margin of Error
Total:	140,197	+/-808
Speak only English	77,707	+/-1,887
Spanish or Spanish Creole:	58,121	+/-2,006
Speak English "very well"	27,436	+/-1,675
Speak English less than "very well"	30,685	+/-1,403
French (incl. Patois, Cajun):	169	+/-113

Speak English "very well"	134	+/-107
Speak English less than "very well"	35	+/-30
French Creole:	36	+/-56
Speak English "very well"	36	+/-56
Speak English less than "very well"	0	+/-30
Italian:	24	+/-27
Speak English "very well"	24	+/-27
Speak English less than "very well"	0	+/-30
Portuguese or Portuguese Creole:	35	+/-38
Speak English "very well"	35	+/-38
Speak English less than "very well"	0	+/-30
German:	158	+/-91
Speak English "very well"	142	+/-90
Speak English less than "very well"	16	+/-17
Yiddish:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Other West Germanic languages:	57	+/-58
Speak English "very well"	57	+/-58
Speak English less than "very well"	0	+/-30
Scandinavian languages:	127	+/-193
Speak English "very well"	86	+/-130
Speak English less than "very well"	41	+/-62
Greek:	25	+/-30
Speak English "very well"	17	+/-25
Speak English less than "very well"	8	+/-14
Russian:	20	+/-24
Speak English "very well"	13	+/-21
Speak English less than "very well"	7	+/-11
Polish:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Serbo-Croatian:	8	+/-14
Speak English "very well"	8	+/-14
Speak English less than "very well"	0	+/-30
Other Slavic languages:	67	+/-82
Speak English "very well"	67	+/-82
Speak English less than "very well"	0	+/-30
Armenian:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Persian:	112	+/-106
Speak English "very well"	58	+/-64
Speak English less than "very well"	54	+/-60
Gujarati:	133	+/-132
Speak English "very well"	93	+/-96

Speak English less than "very well"	40	+/-40
Hindi:	171	+/-139
Speak English "very well"	146	+/-131
Speak English less than "very well"	25	+/-39
Urdu:	78	+/-91
Speak English "very well"	78	+/-91
Speak English less than "very well"	0	+/-30
Other Indic languages:	474	+/-496
Speak English "very well"	386	+/-421
Speak English less than "very well"	88	+/-79
Other Indo-European languages:	10	+/-15
Speak English "very well"	10	+/-15
Speak English less than "very well"	0	+/-30
Chinese:	316	+/-166
Speak English "very well"	182	+/-132
Speak English less than "very well"	134	+/-86
Japanese:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Korean:	341	+/-304
Speak English "very well"	201	+/-189
Speak English less than "very well"	140	+/-137
Mon-Khmer, Cambodian:	47	+/-59
Speak English "very well"	0	+/-30
Speak English less than "very well"	47	+/-59
Hmong:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Thai:	37	+/-58
Speak English "very well"	20	+/-31
Speak English less than "very well"	17	+/-27
Laotian:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Vietnamese:	703	+/-209
Speak English "very well"	239	+/-107
Speak English less than "very well"	464	+/-148
Other Asian languages:	357	+/-222
Speak English "very well"	262	+/-180
Speak English less than "very well"	95	+/-84
Tagalog:	290	+/-201
Speak English "very well"	256	+/-191
Speak English less than "very well"	34	+/-51
Other Pacific Island languages:	40	+/-39
Speak English "very well"	32	+/-35
Speak English less than "very well"	8	+/-13

Navajo:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Other Native North American languages:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
Hungarian:	8	+/-13
Speak English "very well"	0	+/-30
Speak English less than "very well"	8	+/-13
Arabic:	155	+/-95
Speak English "very well"	121	+/-79
Speak English less than "very well"	34	+/-48
Hebrew:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30
African languages:	371	+/-350
Speak English "very well"	217	+/-188
Speak English less than "very well"	154	+/-180
Other and unspecified languages:	0	+/-30
Speak English "very well"	0	+/-30
Speak English less than "very well"	0	+/-30

Source: U.S. Census Bureau, 2011-2015 5-Year American Community Survey

Limited English Speaking Households for the City of Pasadena, Texas: 2017
2013-2017 American Community Survey 5-Year Estimates

Limited English Speaking Households for the City of Pasadena, Texas: 2017						
Subject	Total		Total LEP Households		Percent LEP Households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
All households	48,931	+/-772	6,365	+/-527	13.00%	+/-1.0
Households speaking:						
Spanish	20,827	+/-609	5,978	+/-526	28.70%	+/-2.4
Other Indo-European languages	543	+/-165	35	+/-33	6.40%	+/-5.7
Asian and Pacific Island languages	809	+/-145	344	+/-145	42.50%	+/-13.3
Other languages	152	+/-76	8	+/-12	5.30%	+/-8.7

Source: U.S. Census Bureau, 2013-2017 5-Year American Community Survey

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

In general, all public service programs and housing programs administered through the City of Pasadena serve a variety of persons. Therefore, LEP residents are likely to have considerable direct contact with the program and its staff. Subrecipients whose programs have direct contact with Spanish-speaking residents may be required by the City of Pasadena to develop a Language Access Plan for the program.

3. The nature and importance of the program(s), activities, or services provided by the program.

The proposed projects would likely provide direct assistance to project area beneficiaries related to housing and/or public services; therefore, the nature of the activities or services is of significant importance to the proposed area residents. Subrecipients whose projects have a significant impact on Spanish-speaking residents may be required by the City of Pasadena to develop a Language Access Plan for the program/project.

4. The resources available and costs to the recipient.

Currently internet sites can be utilized to translate some written materials. Additionally, local volunteers and bilingual staff have been identified to provide oral interpretation services at public meetings and during conversations with LEP residents during the implementation of a proposed project. Staff assist with phone and in person interpretation, as well as some document translation services. Furthermore, many of the common forms used in the implementation of a CDBG, HOME, ESG and HCV programs are available in multiple languages on the U.S. Department of Housing and Urban Development (HUD) website. Additionally, translation activities are eligible administrative expenses for federal programs. Therefore, language assistance measures indicated in the Language Access Plan are reasonable given the resources available to the City of Pasadena.

Certification:

Based on the above Four-Factor Analysis, the City of Pasadena is required to develop a LAP as follows.

Language Access Plan:

As a result of the preceding Four-Factor Analysis, the City of Pasadena has identified the following types of language assistance to be provided on an as needed basis by the City of Pasadena throughout the implementation of its federally funded programs:

- All published citizen participation advertisements will include a statement in Spanish indicating other program materials are available in Spanish upon request.
- All citizen participation notices will include a statement that interpreters will be available at public meetings upon request.

- If needed, an interpreter may be retained to provide oral interpretation in the field during the implementation of the project activities (generally for housing rehabilitation, hookups, acquisition, and relocation projects only).
- If other populations of LEP persons are identified in the future, the City of Pasadena will consider additional measures to serve the language access needs of those persons.

Language Access Training:

This Language Access Plan is made available to all staff by posting on the City's webpage at <https://www.pasadenatx.gov/622/Plans-Notices>.

Evaluation:

To continue to provide effective services for LEP persons, the City of Pasadena will monitor shifts in our population's demographics and adjust this LAP as necessary. As part of the review, the City of Pasadena will assess:

- Whether there have been any significant changes in the composition or language needs of LEP populations;
- Any issues or problems related to serving LEP persons which may have emerged since the previous approved plan; and/or
- Identification of any recommended actions to more responsive effective language services.