



Four Factor Analysis

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with limited English proficiency (LEP persons). The North Carolina Housing Finance Agency (NCHFA) is a recipient of federal funds for a portion of its programs and thus obligated to reduce language barriers that can preclude meaningful access by LEP persons to NCHFA's programs.

For the purposes of this plan:

- a) *Recipient* means the entity designated as a recipient for assistance with federal funding. This is any entity which receives federal assistance, directly from NCHFA or from another recipient. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, private agency or institution, builder, property manager, residential management corporation, or cooperative association.
- b) *LEP* means Limited English Proficiency.
- c) *LAP* means Language Access Plan.
- d) *Limited English Proficiency person*, as defined in the 2000 U.S. Census, is any individual who speaks a language at home other than English as their primary language, and who speak or understand English "not well" or "not at all".

Analysis

NCHFA conducted a four factor analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Agency or its federally funded programs, (2) frequency with which LEP persons come into contact with Agency's program, (3) nature and importance of the program, activity, or service to people's lives, and (4) resources available and costs. Per the 2015 American Community Survey One Year Estimate, approximately 8% (7.6%) of North Carolina's population speak Spanish at home, and approximately 3% (3.4%) of North Carolina's population is Spanish speaking with limited English proficiency at home. No other ethnicity has a sizeable limited English proficient population. Approximately 89% (88.5%) of North Carolina's population speaks only English at home.

NCHFA primarily provides funds to organizations and does not interact directly with individual households. Even in situations where the funds directly benefit an individual household, NCHFA's contact is with the organization or lender assisting the household. NCHFA provides

housing assistance through our local government, nonprofit, and for profit partners. As a result, LEP persons rarely come into contact with federally funded programs through NCHFA directly. LEP persons using our programs interact with our programs, through our partners, typically no more than 1-3 times a year.

NCHFA does not provide any direct service or program that provides immediate or emergency assistance such as medical treatment or food provision. NCHFA's programs strive to provide multi-family and single-family housing as well as housing repair/rehabilitation. Delay of access would not unduly harm LEP persons. Its single family housing programs serve individuals through NCHFA's partners; its multifamily housing programs work with developers and property managers with absolutely no interaction with individuals. Based on a cumulative analysis of our programs, the main non English speaking group that uses our programs is Hispanic.

Types of language assistance to be provided by NCHFA

In response to the significant Spanish-speaking populations in North Carolina, NCHFA has had a Spanish version of its website available since 2007 and has vital documents available in Spanish as well as program brochures and materials. In addition, NCHFA has staff members whom are bilingual in English and Spanish who can translate if needed. Furthermore, upon request, NCHFA will provide oral interpretation and/or written translation in other languages. If other significant populations of LEP persons are identified in future Census data, NCHFA will consider additional targeted measures to serve the needs of those populations.

Because virtually all assistance is provided by NCHFA's partners, all applicants/sub-grantees will be required to comply with Title VI and its accompanying regulations. All organizations receiving federal funds will provide their Four Factor Analysis to NCHFA. Organizations serving counties with 5% or greater LEP persons will be required to complete a Language Access Plan (LAP). NCHFA will assist agencies in finding appropriate translation resources and disseminate translated HUD notices, brochures, and other documents.

Evaluation

NCHFA will update its Four Factor Analysis, making revisions to policies and procedures as may be required periodically. NCHFA staff will also be trained on LEP policies and procedures.

NCHFA's Four Factor Analysis is available to the public. The information will be made available in a form accessible to persons with disabilities upon request to NCHFA, 3508 Bush Street, Raleigh NC 27609, Tel (919) 877-5700.

Citizens, public agencies, and other interested parties will have reasonable and timely access to information and records relating to the Four Factor Analysis. All records that are public under G.S. 132 will be made accessible to interested individuals and groups during normal working hours.

At any time, citizens may submit complaints related to the Four Factor Analysis by contacting the Agency's LEP contact people: Nancy Bloebaum at nbbloebaum@nchfa.com and Emila Sutton at ejsutton@nchfa.com

NCHFA will provide a written response to every written complaint that relates to the Four Factor Analysis within 15 business days.

Updated 11/21/16