



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 NCHFA or its federally funded programs, (2) frequency with which LEP persons come into contact with NCHFA programs, (3) nature and importance of the program, activity, or service to people's lives, and (4) resources available and costs:

- (1) Per the 2016 American Community Survey Five-Year Estimate, 7.4% of North Carolina's population speaks Spanish at home, and 3.4% of North Carolina's population is Spanish-speaking with limited English proficiency at home. No other ethnicity has a sizeable LEP population. About 88.8% of North Carolina's population speaks only English at home. Based on a cumulative analysis of our programs, the main non English speaking group that uses our programs is Hispanic. Based on analysis of internal data, the main non-English speaking group that uses NCHFA programs is Spanish-speaking.
- (2) 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, not with the

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

- (3) NCHFA programs do not provide any direct service or immediate/emergency assistance, such as medical treatment or food provision; they provide multifamily and single-family housing and housing repair/rehabilitation. Delay of access to the programs would not unduly harm LEP persons. NCHFA's single-family housing programs serve individuals through government, nonprofit, and for-profit partners and its multifamily housing programs work with developers and property managers; NCHFA has no direct programmatic interaction with individuals.
- (4) In response to the significant Spanish-speaking population in North Carolina, NCHFA has a Spanish version of its website and has vital documents, program brochures, and materials available in Spanish. In addition, NCHFA staff members who are bilingual in English and Spanish are available to translate. Upon request, NCHFA will provide oral interpretation and/or written translation in other languages. If other significant populations of LEP persons are identified based on future releases of Census data, NCHFA will consider additional targeted measures to serve 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 conduct and provide a Four Factor Analysis to NCHFA and organizations serving counties with 5% or greater LEP persons will be required to complete a LAP. NCHFA will assist agencies in finding appropriate translation resources and will disseminate translated U.S. Department of Housing and Urban Development ("HUD") notices, brochures, and other documents.

Evaluation

NCHFA will update its Four Factor Analysis when new Census data is released and will revise its policies and procedures as necessary. 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: Erika Brandt at ecbrandt@nchfa.com and Emila Sutton at esutton@nchfa.com. NCHFA will provide a written response to every written complaint that relates to the Four Factor Analysis within 15 business days.

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