



CITY OF SARATOGA SPRINGS LANGUAGE ASSISTANCE PLAN

For Community Development Block Grant Funding
Planning & Programming

In accordance with:

U.S. Department of Housing and Urban Development Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficiency (LEP) Persons

Background

The City of Saratoga Springs is committed to quality, inclusive Community Development Block Grant (CDBG) planning and programming that involves all residents of the City who wish to participate or utilize CDBG funded services, including those who do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English.

According to the U.S. Department of Housing and Urban Development’s (HUD) Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficiency (LEP) Persons, “Title VI and its implementing regulations require that recipients take responsible steps to ensure meaningful access by LEP persons. This guidance provides an analytical framework that recipients may use to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are [LEP].” LEP requirements extend to all CDBG programs and activities.

Analysis

HUD recommends a specific Four Factor method of analysis by an agency receiving federal funds. After conducting the analysis, the agency will be in a better position to both determine the extent of proactive language-assistance measures required and target resources appropriately. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

In adherence with direct guidance from the HUD Buffalo Field Office, the City of Saratoga Springs has examined 2018 5-year estimate data from the American Community Survey (ACS) Demographics and Housing Estimates (Table DP05), which outlines the racial make-up of the City’s population as opposed to ACS Table B16004, Age by Language Spoken at Home By Ability to Speak English For the Population 5 Years and Over, as is used by many CDBG Entitlement Communities. HUD Buffalo Field Office guidance indicated that the “speaks English less than well category”, may not be a true representation of LEP community needs. The Buffalo Field Office suggests that many people do not self-identify as such for fears of stigmatizing; discrimination or isolation.

Of the City’s 27,772 total population, 1,026 (3.7%) identify as Asian, and 891 identify as Hispanic (3.2%). Table 1 shows further breakdown of these populations.

The HUD “Specific Safe Harbor Guidance” provision states that “HUD would expect translations of vital documents to be provided when the eligible LEP population in the market area or the current beneficiaries exceeds 1,000 persons or if it exceeds 5 percent of

ACS Demographics and Housing Estimates (Table DP05) 2018		
Total Population	27,772	100%
Asian	1,026	3.7%
Asian Indian	399	1.2%
Chinese	337	1.2%
Korean	124	0.4%
Vietnamese	75	0.3%
Japanese	27	0.1%
Filipino	15	0.1%
Other Asian	49	0.2%
Hispanic or Latino	891	3.2%
Mexican	346	1.2%
Puerto Rican	217	0.8%
Cuban	9	0.0%
Other Hispanic or Latino	319	1.1%

Table 1

the eligible population or beneficiaries along with more than 50 persons.” As shown on Table 1, though the Asian population is slightly above the 1,000 persons threshold, no specific language group therein meets any of the aforementioned thresholds. The City’s Hispanic population does not reach these thresholds either.

2. The frequency with which LEP persons come in contact with the City’s CDBG programs, activities, and services.

To date, the City’s Community Development Department has not come in contact with LEP persons under the context of CDBG activities, and no requests for language-assistance related to CDBG activities have been made of the Department by LEP individuals.

However, a small number of community non-profit partners who are frequent sub-grantees of the City’s CDBG Entitlement Funding do regularly serve LEP persons. These community partners have made appropriate accommodations to serve these individuals and notify them about availability of services.

3. The nature and importance of services provided by the City of Saratoga Springs to the LEP population.

The CDBG Program in the City of Saratoga Springs provides for several different types of programming designed to assist and improve the lives of low-moderate income residents. Programs range from funding for single family housing repair to support of case managers at shelters. Typically the programs funded by CDBG require an application process and are generally not emergencies, though certain programs can fill urgent needs such as a roof repair or furnace replacement. While the CDBG program is important, delay of access to services would not be life threatening to LEP persons. Affording the sub-grantee a reasonable amount of time to secure an interpreter or have documents translated would not render a person ineligible for a program or cause a program to be inaccessible to a person struggling with English. Sub-grantees who experience regular contact with LEP persons have designed their outreach and programming to accommodate these needs.

4. The resources available to the City of Saratoga Springs, and overall costs to provide LEP assistance.

Although the City of Saratoga Springs serves a very limited number of LEP persons under the CDBG Entitlement Program, the City is committed to removing as many barriers to information access as feasible. As no requests for an interpreter have been made in the previous five years, it would be unnecessary for the county to employ an interpreter. Likewise, the lack of requests for document translation would render premature translation of documents that will likely need frequent updating superfluous as well. Rather it is most logical to compile a resource list of interpreters and document translation services and to collaborate with existing agencies within the region to provide these services as needed.

Language Access Plan

The following steps have been identified to reduce language barriers to LEP persons in the City of Saratoga Springs.

- At all CDBG public meetings City Staff will attempt to identify LEP persons and provide guidance as to how to receive the information in a language-appropriate format. Currently, two Community Development Staff Members are bi-lingual Spanish speakers.
- Have available, at all public meetings, the Census Bureau's "I Speak Cards" located near the sign in sheet. Although staff would not be able to provide translation at that time, arrangements could be made for any needs of the attendee.
- Request formal documentation by CDBG sub-grantees of any instances of LEP persons, requests, or inquiries on a quarterly basis. This information could also be used as a data source to identify potential future language needs.
- Post signage at public meetings, local agencies, and local government offices noting that language translation will be made available if requested.
- Identify a resource list of interpreters and document translation services.
- Collaborate with local agencies and institutions who are able to provide interpretation and translation services.
- Whenever information is made available in multiple languages (ex. Fair Housing brochures printed in Spanish by HUD) have the translations on file and on display if possible in the appropriate agencies.
- Review Census 2020 data when released to examine any potential changes in the LEP population.
- Post the LAP plan on the City's Community Development page.
- Review the LAP yearly and update as needed. Updates should include interviews with sub-grantees focusing on any new LEP encounters or requests for assistance, review of changes in resources lists, and review of changes in available local resources.