

**FOUR-FACTOR ANALYSIS
and
LANGUAGE ACCESS PLAN**

FOR LIMITED ENGLISH PROFICIENCY PERSONS



Prepared for programs funded by:
The U.S. Department of Housing & Urban Development and
The Alabama Department of Economic and Community Affairs

MOBILE COUNTY

Adopted: December 22, 2008
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Purpose: In compliance with Executive Order 13166 and U. S. Department of Housing and Urban Development (HUD) Final Guidance to Federal Financial Assistance recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (Federal Register Vol. 72, No. 13 dated January 22, 2007), the Mobile County Commission has developed the following Language Access Plan (LAP) for Limited English Proficiency (LEP) persons.

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 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.

Mobile County Commission Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the County will undertake to guarantee access to the programs funded by (HUD) and the Alabama Department of Economic and Community Affairs (ADECA) funds (as may be made available to Mobile County).

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).

Mobile County utilized U.S. Census Bureau, American Factfinder, Table B16001, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, 2011-2015 American Community Survey 5-Year Estimates (See Appendix B and C). Since the Mobile County Urban County Consortium includes all of Mobile County, with the exception of the City of Mobile (which operates a separate HUD entitlement program) and the City of Dauphin Island (which does not currently participate in the Consortium), it was determined that the number / proportion of LEP persons served or encountered in the eligible service area population could best be determined by taking Mobile County data (as a whole) and subtracting the information for the City of Mobile for those languages that were determined to meet / exceed the safe harbor thresholds as identified in Appendix B of the January 22, 2007 Federal Register referenced above (i.e., Spanish or Spanish Creole and Vietnamese). Since the City of Dauphin Island could potentially decide to participate in an on-going or future HUD funded program conducted by the Consortium, no effort to extract these persons has

been made. Based on finalized calculations of this data, Mobile County does meet the 1,000 or 5% LEP person threshold for Spanish or Spanish Creole.

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

Mobile County consistently implements various HUD programs as an entitlement community or as a recipient of funding from ADECA. As a result, the County may have opportunities in which to communicate with persons of LEP. To date, there have been no specific instances of a need to communicate with Spanish or Spanish Creole speaking persons directly; however, given that these language groups exceed "safe harbor" thresholds, there is on-going potential that such opportunities will occur.

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

Various programs and activities undertaken by the aforementioned funding sources have been used previously and will be used in the future to provide direct assistance to the service population; therefore, the scope and nature of programs and activities will need to be evaluated on an on-going basis to determine the potential impact to LEP persons.

4. The resources available and costs to the recipient.

As a small entitlement community, limited resources are an impediment to providing translation services (either orally or in writing). This noted, there are publically available websites and applications that can be utilized to translate written material in order to reduce costs. These will be used to the maximum extent feasible in order to minimize expenses and will include a notation that the quality and accuracy of such are limited due to the use of electronic translation. The County's website will be used to post written materials, to include vital documents which have been translated. As for oral language services, given the presence of local colleges and universities that offer degrees in Spanish, it is believed that local volunteers and/or students can be identified to provide oral translation services at public meetings and during conversations (in person or by phone) with LEP residents (as necessary).

Since translation activities are an eligible administrative expense, limited costs associated with LAP compliance measures could be justified; however, these will need to be evaluated based on current budget limitations at the time they are needed.

Language Access Plan: As a result of the preceding Four-Factor Analysis, the Mobile County Commission has identified Spanish and Spanish Creole as a language where assistance is to be provided on an as needed basis.

APPENDIX A¹

MOBILE COUNTY

LEP Population of Spanish or Spanish Creole

Area	Total Population	Spanish or Spanish Creole Speak English less than "very well"
Mobile County	386,601	3,175
City of Mobile	(181,517)	(1,630)
Mobile County Eligible Population	205,084	*1,545

*A language group of 1,000 or more in the eligible population requires reasonable steps be taken to ensure meaningful access of vital housing documents to LEP persons.

¹ Source: U.S. Census Bureau American FactFinder Table B16001 for 2011-2015 American Community Survey 5 Year Estimates

APPENDIX B

MOBILE COUNTY INCLUDING CITY OF MOBILE



B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
 Universe: Population 5 years and over
 2011-2015 American Community Survey 5-Year Estimates

	Mobile County, Alabama	
	Estimate	Margin of Error
Total:	386,601	*****
Speak only English	367,745	+/-1,024
Spanish or Spanish Creole:	8,467	+/-749
Speak English "very well"	5,292	+/-697
Speak English less than "very well"	3,175	+/-571
French (incl. Patois, Cajun):	740	+/-210
Speak English "very well"	609	+/-174
Speak English less than "very well"	131	+/-98
French Creole:	8	+/-13
Speak English "very well"	0	+/-27
Speak English less than "very well"	8	+/-13
Italian:	52	+/-36
Speak English "very well"	52	+/-36
Speak English less than "very well"	0	+/-27
Portuguese or Portuguese Creole:	88	+/-81
Speak English "very well"	29	+/-36
Speak English less than "very well"	59	+/-50
German:	785	+/-204
Speak English "very well"	624	+/-164
Speak English less than "very well"	161	+/-91
Yiddish:	11	+/-17
Speak English "very well"	11	+/-17
Speak English less than "very well"	0	+/-27
Other West Germanic languages:	63	+/-57
Speak English "very well"	63	+/-57
Speak English less than "very well"	0	+/-27
Scandinavian languages:	23	+/-25
Speak English "very well"	23	+/-25
Speak English less than "very well"	0	+/-27
Greek:	109	+/-83
Speak English "very well"	83	+/-72
Speak English less than "very well"	26	+/-29

	Mobile County, Alabama	
	Estimate	Margin of Error
Russian:	60	+/-65
Speak English "very well"	49	+/-53
Speak English less than "very well"	11	+/-19
Polish:	28	+/-35
Speak English "very well"	28	+/-35
Speak English less than "very well"	0	+/-27
Serbo-Croatian:	121	+/-147
Speak English "very well"	64	+/-68
Speak English less than "very well"	57	+/-90
Other Slavic languages:	23	+/-23
Speak English "very well"	23	+/-23
Speak English less than "very well"	0	+/-27
Armenian:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Persian:	121	+/-136
Speak English "very well"	64	+/-64
Speak English less than "very well"	57	+/-79
Gujarati:	282	+/-209
Speak English "very well"	235	+/-224
Speak English less than "very well"	47	+/-57
Hindi:	457	+/-207
Speak English "very well"	429	+/-197
Speak English less than "very well"	28	+/-40
Urdu:	141	+/-118
Speak English "very well"	112	+/-113
Speak English less than "very well"	29	+/-45
Other Indic languages:	196	+/-120
Speak English "very well"	172	+/-120
Speak English less than "very well"	24	+/-24
Other Indo-European languages:	46	+/-40
Speak English "very well"	46	+/-40
Speak English less than "very well"	0	+/-27
Chinese:	399	+/-264
Speak English "very well"	255	+/-195
Speak English less than "very well"	144	+/-133
Japanese:	92	+/-93
Speak English "very well"	36	+/-44
Speak English less than "very well"	56	+/-86
Korean:	33	+/-45
Speak English "very well"	27	+/-37
Speak English less than "very well"	6	+/-11
Mon-Khmer, Cambodian:	555	+/-324
Speak English "very well"	245	+/-179
Speak English less than "very well"	310	+/-159
Hmong:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Thai:	137	+/-130
Speak English "very well"	42	+/-53
Speak English less than "very well"	95	+/-99
Laotian:	847	+/-306
Speak English "very well"	600	+/-285
Speak English less than "very well"	247	+/-221
Vietnamese:	2,595	+/-507
Speak English "very well"	1,386	+/-433
Speak English less than "very well"	1,209	+/-354
Other Asian languages:	160	+/-106
Speak English "very well"	160	+/-106

	Mobile County, Alabama	
	Estimate	Margin of Error
Speak English less than "very well"	0	+/-27
Tagalog:	516	+/-279
Speak English "very well"	348	+/-246
Speak English less than "very well"	168	+/-109
Other Pacific Island languages:	38	+/-54
Speak English "very well"	38	+/-54
Speak English less than "very well"	0	+/-27
Navajo:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other Native North American languages:	96	+/-88
Speak English "very well"	89	+/-86
Speak English less than "very well"	7	+/-14
Hungarian:	19	+/-29
Speak English "very well"	19	+/-29
Speak English less than "very well"	0	+/-27
Arabic:	1,205	+/-712
Speak English "very well"	711	+/-576
Speak English less than "very well"	494	+/-384
Hebrew:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
African languages:	301	+/-184
Speak English "very well"	120	+/-79
Speak English less than "very well"	181	+/-141
Other and unspecified languages:	42	+/-53
Speak English "very well"	10	+/-15
Speak English less than "very well"	32	+/-53

APPENDIX C
CITY OF MOBILE

U.S. Census Bureau



B16001

**LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR
THE POPULATION 5 YEARS AND OVER**
Universe: Population 5 years and over
2011-2015 American Community Survey 5-Year Estimates

	Mobile city, Alabama	
	Estimate	Margin of Error
Total:	181,517	+/-650
Speak only English	172,344	+/-1,154
Spanish or Spanish Creole:	4,698	+/-721
Speak English "very well"	3,068	+/-598
Speak English less than "very well"	1,630	+/-343
French (incl. Patois, Cajun):	395	+/-154
Speak English "very well"	297	+/-121
Speak English less than "very well"	98	+/-87
French Creole:	8	+/-13
Speak English "very well"	0	+/-27
Speak English less than "very well"	8	+/-13
Italian:	47	+/-34
Speak English "very well"	47	+/-34
Speak English less than "very well"	0	+/-27
Portuguese or Portuguese Creole:	27	+/-27
Speak English "very well"	9	+/-14
Speak English less than "very well"	18	+/-22
German:	419	+/-120
Speak English "very well"	347	+/-113
Speak English less than "very well"	72	+/-42
Yiddish:	11	+/-17
Speak English "very well"	11	+/-17
Speak English less than "very well"	0	+/-27
Other West Germanic languages:	39	+/-49
Speak English "very well"	39	+/-49
Speak English less than "very well"	0	+/-27
Scandinavian languages:	21	+/-24
Speak English "very well"	21	+/-24
Speak English less than "very well"	0	+/-27
Greek:	54	+/-47
Speak English "very well"	28	+/-25
Speak English less than "very well"	26	+/-29

	Mobile city, Alabama	
	Estimate	Margin of Error
Russian:	52	+/-62
Speak English "very well"	49	+/-53
Speak English less than "very well"	3	+/-11
Polish:	9	+/-14
Speak English "very well"	9	+/-14
Speak English less than "very well"	0	+/-27
Serbo-Croatian:	118	+/-147
Speak English "very well"	61	+/-68
Speak English less than "very well"	57	+/-90
Other Slavic languages:	23	+/-23
Speak English "very well"	23	+/-23
Speak English less than "very well"	0	+/-27
Armenian:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Persian:	15	+/-18
Speak English "very well"	15	+/-18
Speak English less than "very well"	0	+/-27
Gujarati:	22	+/-34
Speak English "very well"	22	+/-34
Speak English less than "very well"	0	+/-27
Hindi:	308	+/-198
Speak English "very well"	280	+/-190
Speak English less than "very well"	28	+/-40
Urdu:	141	+/-118
Speak English "very well"	112	+/-113
Speak English less than "very well"	29	+/-45
Other Indic languages:	168	+/-106
Speak English "very well"	144	+/-105
Speak English less than "very well"	24	+/-24
Other Indo-European languages:	16	+/-18
Speak English "very well"	16	+/-18
Speak English less than "very well"	0	+/-27
Chinese:	127	+/-80
Speak English "very well"	89	+/-56
Speak English less than "very well"	38	+/-56
Japanese:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Korean:	16	+/-25
Speak English "very well"	10	+/-15
Speak English less than "very well"	6	+/-11
Mon-Khmer, Cambodian:	9	+/-18
Speak English "very well"	9	+/-18
Speak English less than "very well"	0	+/-27
Hmong:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Thai:	9	+/-14
Speak English "very well"	9	+/-14
Speak English less than "very well"	0	+/-27

Laotian:	69	+/-99
Speak English "very well"	69	+/-99
Speak English less than "very well"	0	+/-27
Vietnamese:	903	+/-358
Speak English "very well"	256	+/-170
Speak English less than "very well"	647	+/-295
Other Asian languages:	61	+/-54
Speak English "very well"	61	+/-54
Speak English less than "very well"	0	+/-27
Tagalog:	320	+/-196
Speak English "very well"	176	+/-147
Speak English less than "very well"	144	+/-103
Other Pacific Island languages:	38	+/-54
Speak English "very well"	38	+/-54
Speak English less than "very well"	0	+/-27
Navajo:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other Native North American languages:	70	+/-84
Speak English "very well"	63	+/-83
Speak English less than "very well"	7	+/-14
Hungarian:	19	+/-29
Speak English "very well"	19	+/-29
Speak English less than "very well"	0	+/-27
Arabic:	654	+/-445
Speak English "very well"	217	+/-103
Speak English less than "very well"	437	+/-375
Hebrew:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
African languages:	251	+/-177
Speak English "very well"	86	+/-67
Speak English less than "very well"	165	+/-139
Other and unspecified languages:	36	+/-53
Speak English "very well"	4	+/-8
Speak English less than "very well"	32	+/-53