

City of Buffalo

Mayor's Office of Strategic Planning

Community Development Block Grant (CDBG) Language Assessment Four – Factor Analysis

A component document of the Language Access Plan

RELATING TO THE ADMINISTRATION OF GRANT PROGRAMS PROVIDED TO CITY OF BUFFALO BY
THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

- COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)

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For more information, email: HUDAdministrator@city-buffalo.com



CITY OF BUFFALO MAYOR’S OFFICE OF STRATEGIC PLANNING

Community Development Block Grant (CDBG) Language Assessment Four – Factor Analysis

The City of Buffalo Mayor’s Office of Strategic Planning (OSP) has conducted a local needs assessment to determine the relative presence of people who are LEP (anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English) in the City of Buffalo, the frequency with which people who are LEP come into contact with City of Buffalo CDBG programs, the importance of such programs to Individuals with LEP, and the cost and resources available to provide language access and assistance to Individuals with LEP assisted by such programs. The intent of this analysis is to find a balance that ensures meaningful access to critical services by persons who are LEP while not imposing undue financial burden on the City.

Factor 1 – Number or proportion of Individuals with LEP served or encountered in the eligible service area (including those persons who would be served or encountered if the persons received adequate outreach and the City provided sufficient language services)

OSP is committed to preparing a plan to address the needs of persons with LEP. To consider these needs, the agencies first identified what languages are spoken in the City. The 2015 American Community Survey (ACS) data provides reports on the characteristics of City residents by language spoken at home and the ability to speak English. The Federal Register Notice published January 2007, which details guidance for conducting the Four Factor Analysis, provides that written translation is required when 1,000 persons *or* 5% of the **eligible population**, are considered LEP. The eligible population are persons served or likely to be directly affected by OSP programs or activities in the City of Buffalo. The data indicated the following major language groups have significant populations that speak English less than “very well” within the geographic limits of Buffalo:

Population in the City of Buffalo age 5 and over	238,100	
Total LEP population 5 years of age and over	20,983	8.8%
Spanish-speaking people LEP population	18,658	7.7%

Spanish-speaking people that speak English less than “very well”	6,229	2.6%
Other Indic languages LEP population	2,629	1.1%
Other Indic languages people that speak English less than “very well”	1,636	0.7%
Other Asian language-speaking people LEP population	2,951	1.2%
Other Asian language-speaking people that speak English less than “very well”	2,187	0.9%
Arabic-speaking people LEP population	2,099	0.9%
Arabic-speaking people that speak English less than “very well”	1,342	0.6%
African language-speaking people LEP population	2,681	1.1%
African language-speaking people that speak English less than “very well”	1,179	0.5%

Source: ACS 2018, 2015 (S1601, B16001)

The languages listed above are the only language groups that meet the 5% or 1,000-person threshold for requiring written translation of vital documents. The data demonstrates that most of the City’s LEP population is Spanish-speaking, Other Indic language-speaking, Other Asian language-speaking, Arabic-speaking, and African language-speaking, although there are many other languages spoken in the City. Other Indic, Asian and African languages include:

Language	Examples
Other Indic languages	Nepali, Marathi, Konkani
Other Asian language	Burmese, Tibetan, Turkish
African language	Amharic, Ibo, Yoruba, Bantu, Swahili, Somali

Source: ACS and Puerto Rico Community Survey 2018 Subject Definitions

While the City’s French, Italian, Polish, and Chinese speaking populations each exceed the 1,000-person threshold, only 264, 217, 243 and 713 persons, respectively, of those groups speak English less than very well, far below the 1,000-person or 5% thresholds. The Federal Register Notice published January 2007 provides that when fewer than 1,000 persons *and* fewer than 5% of the eligible population are considered LEP, no written translation is required. Other Indic languages, Other Asian languages and African languages include several languages from South Asian, Eastern and Southeastern Asian and African countries. Based on the low percentage of the population in Buffalo who speak these languages, 0.7%, 0.9% and 0.5% respectively, it is unlikely one will meet the 5% or 1,000-person threshold for requiring written translation of vital documents. Therefore, written language assistance will include Spanish and Arabic translation of vital documents.

Oral assistance shall be available to all persons that request it, regardless of language spoken.

Factor 2 – The frequency with which persons with LEP come into contact with agencies, divisions or sub-recipient organizations which receive federal funds for CDBG programs from the City.

To determine the frequency with which persons with LEP come into contact with agencies, divisions or sub-recipient organizations which receive CDBG funds from the City, a survey was sent to City government divisions as well as sub-recipient organizations who receive CDBG funds from the City to implement programs and services. These entities could encounter an individual with LEP through a variety of ways: program applicants and participants in CDBG funded programming; persons calling for information on CDBG funded programs and services; public notices, public meetings and hearings; public access to agency websites; and informational brochures intended for public distribution.

Survey respondents were asked to describe the manner in which the agency they work for interacts with the public or LEP individuals. The most frequently selected manner was in-person, followed by telephone and electronically.

The majority of respondents were aware of LEP individuals or clusters of non-English speaking residents within their service area and respondents believe these individuals might qualify for programs and service provided by their agencies. Of the 15 respondents, 80% stated their agency has marketed programs or services to these non-English speaking residents. The most frequently noted mailers, brochures and marketing in English and Spanish.

The majority of respondents noted their agencies rely on self-identification by non-English speakers or they assume limited English proficiency if communication seems impaired. Twelve respondents noted the most common language spoken by LEP individuals who use or attempt to access programs or services included Spanish (91.67%), Burmese (75%), Arabic (50%) and Somali (50%). Six respondents identified, the most common language services they provide include bilingual staff (66.67%) and telephone interpretation (50%). Over 60% of the respondents ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret.

Factor 3 – The nature and importance of the program, activity, service, or information provided by agencies, divisions or sub-recipient organizations which receive federal funds for CDBG programs from the City.

The CDBG services provided by the City and sub-recipient agencies are important as they relate to a client's need for or continued provision of services. Such services could be significant to improving the quality of life for residents such as housing rehabilitation to maintain and preserve their homes; payments for rental assistance to maintain stable housing; access to food pantries, employment training, youth programs, and much more.

Factor 4 – Factors 1-3 are then balanced against the available resources and costs to OSP and BURA.

For Spanish and Arabic speaking populations, the City evaluated the cost effectiveness of translating and publishing every vital document and communication to these languages. The City of Buffalo maintains a contract with Language Line, which provides written translation materials on a cost per word basis. To

translate any written, online or recorded document, the cost per word for Spanish and Arabic was \$0.17 and \$0.24, respectively. This is in addition to the cost to publish the notices in the newspaper. To publish one Notice of Public Display for a Consolidated Plan and Annual Action Plan in English in the Buffalo News, the City expends \$1,288.60. To publish one Notice of Public Hearing for a Notice of Public Display for a Consolidated Plan and Annual Action Plan in Spanish, it is \$1,395.70 (\$1,288.60 to publish and \$107.10 to translate). To publish one Notice of Public Hearing for the same documents in Arabic, it costs \$1,439.80 (\$1,288.60 to publish and \$151.20 to translate). Two public notices are required each year for the AAP, one is required for the CAPER, and notices are also required for Substantial Amendments to the AAP.

To publish the notices in English and translate and publish in Spanish and Arabic, the City will expend a minimum of \$4,124.00. The City has determined that due to the high cost of publication and translation of full documents, its resources would be better spent to translate brief summaries of documents such as the Consolidated Plan and CAPER and distribute to agencies such as the Office of New Americans, Buffalo Urban Renewal Authority (BURA), Westminster Economic Development Initiative, Buffalo Center for Arts & Technology and Neighborhood Legal Services for distribution to its membership. The City shall provide written translations of vital documents which includes the Citizen Participation Plan, Language Access Plan, public notices for the Consolidated Plan, Annual Action Plan, and CAPER, marketing materials, applications, notification letters, denials, appeal notices and the City’s CDBG Program Policies and Procedures.

The City has identified the following costs associated with translation and other language assistance services:

Language Service	Cost
Translation of flyers and social media:	\$0.35 to \$0.50 per word
Publication of public notices in characters	Tier 1: \$0.17 to include Spanish, Chinese, Russian, Italian, French, French Creole, Korean Tier 2: \$0.24 to include all other languages
Oral Translation	\$0.89 per minute
Translation of Web Content	Desktop publishing (DTP): \$50/per hour for Tier 1 languages Desktop Publishing (DTP): \$60/per hour for Tier 2 languages
Translation services at public hearings (upon request)	\$160 per hour