

[Limited English Proficiency (LEP): For persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.]

4-Factor Analysis & Language Assistance Plan

CDBG, HOME, ESG &
HOPWA Programs

Camden City
Department of Planning & Development



INTRODUCTION

Title VI of the Civil Right Act of 1964 , 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.

The City of Camden is committed to providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws, including Title VI of the 1964 Civil Rights Act, which requires non-discrimination on the basis of national origin.

This was followed by Presidential Executive Order 13166 (2000), "Improving Access to Services for Persons with Limited English Proficiency", which directs Federal agencies to examine the services it provides and to develop and implement a system by which Limited English Proficient (LEP) persons can meaningfully access those services. This Executive Order requires Federal agencies to assess and address the needs of eligible persons seeking access to Federal programs that because of their limited English cannot fully and equally participate in or benefit from those programs or activities.

On December 19, 2003, the U.S. Department of Housing and Urban Development (HUD) published guidance designed to assist housing authorities to comply with Title VI of Civil Rights Act of 1964. On January 22, 2007, HUD published final guidance to Federal financial assistance recipients regarding the Title VI prohibition against national origin discrimination affecting limited English proficient persons.

In accordance with Federal guidelines, the City of Camden will make reasonable efforts to provide or arrange free language assistance for clientele with Limited English Proficiency (LEP), including applicants, recipients and/or persons eligible for public assistance, Section 8/Housing Choice Vouchers, and other Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for People with AIDS (HOPWA) programs.

The following policy is based on United States Department of Housing & Urban Development's (HUD's) suggested four-factor analysis which examines the **number of limited English proficiency persons served**, the **frequency with which those persons come into contact with services**, the **nature and importance of services provided**, and the **costs to Camden City**. This policy is intended to ensure the City's compliance with the Department of Housing and Urban Development's *Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency* and *HUD's Final LEP Guidance* documentation, and was drafted upon consideration of the services offered, the community served, the resources of Camden City, and the costs of various language service options.

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.

PURPOSE

The purpose of this LEP Four-Factor Analysis and the Language Assistance Plan (LAP) is to identify how the City of Camden Department of Planning and Development will ensure its methods of administration will not have the effect of subjecting LEP persons to discrimination because of their national origin, and to ensure LEP persons have full access to program services. As a recipient of federal assistance, the City of Camden has drafted this LEP Four-Factor Analysis and LAP to ensure access to all programs and acknowledges persons to government services and programs. The Language Access Plan shall be implemented subject to the availability of fiscal resources to implement said plan.

WHO IS LEP?

LEP persons are defined as persons who do not speak English as their primary language and who have limited ability to read, write, speak or understand English. The City of Camden will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

WHAT IS THE FOUR-FACTOR ANALYSIS?

Recipients of Federal funding are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services, while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations.

As a starting point, Camden City has prepared an individualized assessment that balances the following four factors:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
- 2) The frequency with which LEP persons come into contact with the program;
- 3) The nature and importance of the program, activity, or service provided by the program; and
- 4) The resources available and costs to the recipient.

CAMDEN CITY FOUR-FACTOR ANALYSIS

The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the City of Camden will undertake to guarantee access to the City's Community Development Block Grant (CDBG) programs by LEP persons.

- 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).**

The United States Census Bureau's American Community Survey (ACS) has two classifications of how well people speak English. These classifications include "very well" and "less than very well." For the purposes of this analysis, an "LEP Threshold Population" will be defined as any one group constituting at least 5%

of the City's total population, or 1,000 people within the City (whichever is less), that speaks English "less than very well." **Appendix A** shows the languages spoken at home for all persons five years old and older, providing the proportions of persons who speak English "very well" and "less than very well," as a percentage of total population.

As indicated in **Appendix A**, the data suggests that slightly more than half (54.34%) of the City's population "Speak Only English," where 45.66% of the population speaks languages other than English. Of these other languages spoken at home, only Spanish-speaking households represent more than 5% of the City's total population and have a population of more than 1,000 persons within Camden City. Overwhelmingly, 42.13% of speak Spanish – of which 23.62% speak English "very well" but 18.51% speak English less than "very well".

As a reference, the most prominent languages present within the City include Spanish or Spanish Creole (42.13%); Vietnamese (1.42%); Mon-Khmer - Cambodian (0.27%); Other Asian Languages (0.22%); Gujarati (0.21%); and Korean (0.18%). As shown, all other LEP population counts are minimal compared to the count of all Spanish speaking households and do not trigger LEP or LAP requirements per HUD guidance.

Of the households that speak these various languages, there are only one (1) language groups that constitute a population greater than 5% or 1,000 persons as part of the total City population and speak English "less than very well." This includes: Spanish or Spanish Creole (12,957 persons). Overall, these LEP households make up 18.51% of the overall population in Camden City.

Language Spoken at Home by Ability to Speak English Less Than Very Well Greater Than 5% or 1,000 Persons		
	Population Estimate	Percentage of Total Population
Total Population	70,011	100.00%
Speak only English	38,046	54.34%
Spanish or Spanish Creole:	29,495	42.13%
Speak English "very well"	16,538	23.62%
Speak English less than "very well"	12,957	18.51%

Source: 2011-2015 American Community Survey 5-Year Estimates

Camden City utilized the United States ACS 5-Year Estimate, Table B16001: **Language Spoken at Home and Ability to Speak English for Population 5 Years and Over**. Based on HUD's definition of LEP Threshold Population, there is only one (1) language group with a population greater than 5% of the total City population or 1,000 persons that "speaks English less than very well" – which are Spanish or Spanish Creole speaking households.

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

The City provides a number of services utilizing CDBG, HOME, ESG & HOPWA allocations, which includes rehabilitation of affordable housing including emergency repair programs; clearance, demolition and code enforcement activities; emergency shelter and short-term housing initiatives; economic development and revitalization (CHOICE Neighborhoods); lead-based paint abatement and energy efficiency; tenant-based rental assistance; first time homebuyer programs; and planning assistance. Therefore, residents are likely to have considerable, direct contact with programs and City staff.

As reflected in the number of eligible and/or potential LEP clients in the City of Camden, the Department of Planning and Development, Division of Housing encounters few LEP persons. In 2018 and 2019, the Department has assisted approximately forty (40) LEP Spanish-speaking individuals who required assistance and were provided such service at the time of their request. Also during this time, there were no individuals from other LEP populations that either requested or required assistance.

Local administrators of the CDBG program were provided a survey to assess the frequency of LEP persons coming into contact with CDBG programs and services, as well as general City business. A sample of the survey provided can be found in **Appendix B**. The results of the survey indicate that assistance is often requested for Spanish interpretation and at times translation of documents into Spanish. The results can also be found in **Appendix B**.

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

The largest quantified language occurrence of LEP individuals in Camden City is Spanish. Services provided by Camden City that are most likely to encounter LEP individuals include the City's housing programs.

The services provided by the City of Camden's Department of Planning and Development are important as they relate to a client's need for or continued provisions of affordable housing. The Department offers three (3) direct client programs that are of great importance to area clients including the Housing Improvement Program, First Time Homebuyer's Program and the Emergency Repair Program. In addition, a full-time Fair Housing Officer provides information and referrals to residents seeking information on an array of Fair Housing issues.

All of these programs are designed to provide financial housing assistance of some type of low-and moderate-income households. Therefore, it is important to be able to communicate effectively with all persons making inquiries regarding available assistance.

The resources available and costs to the recipient.

The City's Department of Planning and Development will continue to take all reasonable steps to provide meaningful access for LEP persons to the City of Camden, especially for its programs and activities. In recent years, the Department has seen a significant reduction in funding levels for both the Community Development Block Grant (CDBG) Program and the HOME Investment Partnerships (HOME) Program. This reduction in grant assistance has placed an additional strain on the financial resources used to provide LEP assistance. It is understood that translation activities are an eligible CDBG and HOME

Definition of Terms

Effective Communication – effective communication occurs when staff have taken necessary steps to make sure that a person who is LEP is given adequate information in his/her language to understand the services, benefits or the requirements for services or benefits offered by the City.

Interpretation – Interpretation means the oral or spoken transfer of a message from one language into another language.

Limited English Proficiency – A person with limited English proficiency or "LEP" is not able to speak, read, write or understand the English language well enough to allow him/her to interact effectively with staff.

Meaningful Access – To ensure meaningful access for people with LEP, the City must make free language assistance available to applicants/recipients that results in accurate and effective communication that does not result in undue delay or denial of benefits to which the LEP applicant/recipient is eligible.

Outreach Documents – designed and/or utilized documents used to provide information to the general public but targeting individuals who are eligible or may be eligible for CDBG programs.

Translation – Translation means the written transfer of a message from one language into another language.

Vital Documents – forms or documents designed and utilized by the City of Camden that are critical for accessing federally funded services or benefits or are required by law.

administrative expenses. Therefore, limited LAP measures are reasonable given the resources available to Camden City.

In order to save costs, the Department utilizes bi-lingual staff, when necessary, to communicate with and provide oral translation services to clients, as well as translate its program information into Spanish – the City’s largest LEP population. Should the need arise, the City is prepared to translate into Spanish those documents required to participate in a particular program. If document translations have been completed and are available through other sources, departments, or agencies, the Department will make use of them, as necessary. The Department will also utilize any documents provided by HUD in languages other than English and seek to retain a professional interpretation service to provide oral interpretation in languages other than Spanish if so warranted and on a case-by-case basis.

Camden City will, from time to time, assess its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis; which of its documents would be the most valuable to be translated if the need should arise; and taking an inventory of available organizations that Camden City could partner with for outreach and translation efforts. Currently, internet sites can be utilized to translate some written materials but will never be a primary source of translation.

Certification & Four-Factor Analysis Conclusion

As a result of the preceding Four-Factor Analysis, Camden City has identified the following types of language assistance to be provided on an as needed basis throughout the implementation of its Federally-funded programs:

- HUD citizen participation documents, project-related resolutions, public notices, and amendments may be published in LEP language identified on bulletin boards at the City Municipal Building and in public places throughout the community, when requested.
- Additionally, published citizen participation advertisements will include a statement in LEP languages identified indicating other program materials are available in LEP languages identified upon request.
- If needed, a translator may be retained to provide oral translation in the field during the implementation of the project activities.
- If other populations of LEP persons are identified in the future, Camden City will consider additional measures to serve the language access needs of those persons.

Based on the Four-Factor Analysis and with foreseeable growth in the Spanish speaking population countywide, it is recommended that vital documents be translated into Spanish as suggested by HUD guidance. The remaining five (5) LEP populations, which do not exceed the 5% or 1,000 person threshold, when combined, comprise approximately 2.3% of the total LEP population. As there have been no requests from any of the remaining LEP groups for assistance, and due to increased financial burdens resulting from decreasing HUD allocations, the Department will provide LEP services as outlined in the accompanying LAP until such time that monitoring indicates a need to provide more intensive translation services.

Language Access Plan

In compliance with Executive Order 13166, Camden City has developed the following Language Access Plan (LAP) for Limited English Proficiency (LEP) persons.

As noted in an earlier section of this report, only one (1) language group with a population greater than 5% of the total City population or 1,000 persons that “speaks English less than very well” – which are Spanish or Spanish Creole speaking households. However, the City does not disregard that other LEP populations may need future assistance, which may be provided by the City on a case-by-case basis.

It is the policy of Camden City to provide language access services to populations or persons with LEP who are eligible to be served or likely to be directly affected by CDBG programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.

Any individual eligible for programs/services within Camden City who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with City staff has the following rights:

- A right to qualified interpreter services at no cost to them.
- A right not to be required to rely on their minor children, other relatives, or friends as interpreters.
- A right to file a grievance about the language access services provided them.

Johanna Herrera, Department of Finance in the Bureau of Grants Management is the City’s designated CDBG Equal Opportunity/LEP Coordinator. Camden City’s Equal Opportunity/LEP Coordinator may be reached on weekdays from 9:00AM – 5:00PM at (856) 757-7689. Correspondence can also be sent to Ms. Herrera’s attention to Camden City Department of Finance, Bureau of Grants Management, Camden City Hall, 520 Market Street, Suite 316, Camden, New Jersey 08101.

Language Identification – “I Speak Cards”

In order to first assess the needs of an LEP person, the City must first identify the language that they speak. The City will utilize the United States Census Bureau’s “I Speak Cards,” which invite LEP persons to identify their language needs to City staff. In addition to utilizing these cards for identification purposes, these cards will be used to retain records of interactions with members of the public. A sample of the “I Speak Cards” can be found in **Appendix C**.

Oral Interpretation Services & Bi-lingual Staff

The Department of Planning and Development will make every effort to provide oral interpretation for all its clients who have identified themselves as LEP and request services. The City of Camden employs bilingual, Spanish-speaking staff in several positions to ensure there are sufficient personnel available to assist Spanish-speaking LEP person when needed. While the Department currently has no full-time Spanish staff, as part of the Division of Planning, the Department of Planning and Development has access to a bi-lingual Spanish speaker. In addition, the City of Camden has over 550 employees, a number of which are bilingual, including several Spanish-speaking staff, as well a staff who speak other languages.

“I Speak” language identification cards will be used by administrative and program staff to help those that request assistance but are unable to communicate in English. Once the appropriate language is identified, staff will inform the LEP Coordinator who will then attempt to obtain an appropriate interpretation service.

In particular, the Department actively collaborates with the Housing Authority of Camden City (HACC). Some of the HACC staff, as well as some other City of Camden and Camden County Social Services Agencies bi-lingual employees, must take and pass a civil service competency test in the other language in order to be designated as a bi-lingual person. This civil service test requires the bi-lingual worker to translate written documents from English to the foreign language and from the foreign language to

English. This test is designed and administered by the New Jersey Civil Service Commission. The Department has access to these staff for translation purposes, if necessary.

Camden City does not require, suggest or encourage LEP individuals or families to use friends, family members or minor children as interpreters. If a LEP individual or family insists that a friend or family member serve as interpreter, that choice is documented. Camden City will then, on a case-by-case basis, consider factors such as: competence of the family or friend used as the interpreter; the appropriateness of the use in light of the circumstances and ability to provide quality and accurate information, especially if the interview could result in a negative effect on the individual or family's eligibility for benefits/services; potential or actual conflicts of interest; and confidentiality of the information being interpreted to determine whether the agency should provide its own independent interpreter for itself. In no case does Camden City allow a minor child to act as interpreter for an LEP individual or family.

The City of Camden will continue to coordinate with City staff on its role and responsibilities in providing meaningful access to services for LEP persons, which will include:

- Providing copies of the City's Language Assistance Plan to all departments educating them on the Title VI LEP requirements for providing meaningful access to services for LEP persons;
- Instruct staff on the use of "I Speak" Cards; and
- Provide any additional training needed to ensure knowledge regarding individual rights of LEP populations.

Staff Training

The Department of Planning and Development will provide a copy of this LAP to all existing staff and will also provide training as to its contents and what is required of them under its policies. Topics will include identifying individuals that need language access services, types of services available, procedure for providing such services, and reporting/monitoring requirements. New employees will receive this LAP and the same training as part of their orientation.

Interpretation Services Provisions

In the event that an LEP individual that cannot be accommodated through on-site oral interpretation and translation, CCDPD will seek to provide interpretation through a professional interpreter service if needed. The City of Camden will contract as needed with an appropriate professional service firm to use an oral interpretation service via phone which may be accessed by CCDPD on an as needed basis.

The City of Camden, at no cost to the LEP individuals or families, may provide interpreter services to all LEP individuals or families applying for, participating in programs or receiving services/benefits through the City's CDBG program, as requested. The interpreter services will be provided in an efficient and timely manner so as not to delay a determination of eligibility for an individual or family, receipt of eligible services/benefits or participation in the CDBG program beyond that of an English-speaking individual or family.

Stakeholder Consultation and Community Liaison Referrals

In the unlikely event that the LEP person's primary language is not widely spoken and a suitable interpreter cannot be located, the Department may reach out to one of the City's many agency partners such as the Hispanic Family Center, Puerto Rican Unity for Progress (PRUP) and the Latin American Economic Development Association (LAEDA), all of which service LEP communities. The Department may

also call upon the language resources provided by Rowan College, Rutgers University and Camden County College, which offers various courses and resources.

Translation of Documents

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. Based on the results of the Four-Factor Analysis, and due to fiscal limitations, **Appendix D** suggests a list of vital documents to be translated into Spanish.

HUD has adopted a "safe harbor" for translation of written materials. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the City is in noncompliance.

Rather, the "safe harbors" provide a starting point for recipients to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated.

In many cases, use of the "safe harbor" would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

The table below sets forth safe harbors for written translations:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.

5% or less of the eligible population or beneficiaries and less than 1,000 in number

No written translation is required.

Source: HUD Safe Harbors

The City's analysis indicates that there is only one (1) language group (Spanish) with a population greater than 5% of the total City population or 1,000 persons that "speaks English less than very well."

There are several vital documents on the City's website that are already translated to Spanish; however, additional information on how translation services can be made available should also be integrated as part of the City's website.

Additional LEP outreach may also include the following:

- The Department will conduct outreach in a method that is inclusive of LEP persons identified through its analysis. All Public Notices and marketing advertisements, such a notification of the availability of waiting list applications, shall continue to be published in English. However, each notice will include a brief statement that the notice is available in Spanish upon request by contacting the Department of Planning and Development.
- The Department will offer the following service to provide language accessibility for a majority of the existing LEP population:
 - Public meeting notices and City websites may contain the following statement in Spanish: "Language Access Services are available for free to Limited-English Proficient individuals. Requests for telephonic interpretation services or other special needs must be communicated to the LEP Coordinator at least five (5) business days prior to the meeting in writing or by telephone. Please contact the Department of Planning and Development, Camden City Hall, 520 Market Street, 2nd Floor – Suite 224, Camden, NJ 08101".
 - "Servicios de acceso bilingües están disponibles de forma gratuita a hispanohablantes. Para recibir estos servicios de interpretación u otras necesidades especiales, entregue una solicitud por escrito o por teléfono al coordinador LEP al menos cinco (5) días antes de la reunión. Favor de comunicarse con Department of Planning and Development, Director's Office, Camden City Hall, 2nd Floor – Suite 224, 520 Market Street, Camden, NJ 08101".
 - Upon receipt of such a request, the LEP Coordinator will contact the contracted translation and interpreting services vendor to make arrangement for telephonic interpretation services at the public meeting.
 - Documents will be explained orally to those who are illiterate.
 - Staff will communicate with hearing-impaired and/or deaf residents in writing or via a Deaf Interpreter (DI).
 - Any documents that are received that are non-English shall be forwarded to the LEP Coordinator for processing.
- Relying on the four-factor analysis, for clients who are LEP but are not Spanish-speaking, the Department will translate a notice into a given language that exceeds the 5% or 1,000 person LEP threshold announcing the availability of language assistance. This notice of available language assistance will be posted in the lobby area or the official office bulletin board. Until this is accomplished, the Department will post the notice in English.
- The Department may also participate in community-sponsored events and make presentations through community organizations to target LEP persons and ensure they are aware of the availability of LEP assistance.

Providing Notice to LEP Persons

Although not necessarily required, is important to let LEP persons know that those services are available and that they are free of charge. The City continues to assess partnerships with a variety of local organizations that can assist us in accomplishing these objectives, such working with community-based organizations to inform LEP persons of the language assistance available.

Monitoring and Updating the LAP

The Department of Planning and Development will review and revise, as necessary, the LAP but no less than every five (5) years as part of the City's 5-Year Consolidated Plan to ensure the populations of the various language groups within the jurisdiction and their needs are reflected in the provision of primary-language services. At that point, the LAP will be renewed, to determine if the existing LEP services are sufficient to meet the needs of LEP clients.

As such, the City will assess the effectiveness of the LAP and assess potential LAP modifications based on:

- Current LEP populations in service area or population encountered or affected.
- Frequency of encounters with LEP language groups.
- Nature and importance of activities to LEP persons.
- Availability of resources, including technological advances and the costs imposed.
- Whether existing assistance is meeting the needs of LEP persons.
- Whether staff knows and understands the LAP and how to implement it.
- Whether identified sources for assistance are still available and viable.

In addition, the City will consider demographic shifts (as information becomes available), types of services, or other needs requiring reevaluation.

Complaints

The Department of Planning and Development will display a notice in its official public area indicating the process for filing a complaint with the Department and the New Jersey Office of Civil Rights (OCR) when an individual is not satisfied with the quality or availability of the language access services.

A beneficiary may file a complaint in writing to the LEP Coordinator who will have the document translated, if necessary, and forward it to City of Camden Office of the City Attorney for review and consultation. A beneficiary may also file a complaint directly with HUD's local office of Fair Housing and Equal Opportunity (FHEO). For contact information of the local HUD office, go to the HUD website or call the housing discrimination toll free hotline at 1-800-669-9777 or (TTY) at 1-800-927-9275.

Language Spoken at Home by Ability to Speak English For the Population 5 Years and Older

	Population Estimate	Percentage of Total Population
Total Population	70,011	100.00%
Speak only English	38,046	54.34%
Spanish or Spanish Creole:	29,495	42.13%
Speak English "very well"	16,538	23.62%
Speak English less than "very well"	12,957	18.51%
French (incl. Patois, Cajun):	108	0.15%
Speak English "very well"	85	0.12%
Speak English less than "very well"	23	0.03%
French Creole:	53	0.08%
Speak English "very well"	17	0.02%
Speak English less than "very well"	36	0.05%
Italian:	8	0.01%
Speak English "very well"	0	0.00%
Speak English less than "very well"	8	0.01%
Portuguese or Portuguese Creole:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
German:	5	0.01%
Speak English "very well"	0	0.00%
Speak English less than "very well"	5	0.01%
Yiddish:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other West Germanic languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Scandinavian languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Greek:	0	0.00%
Speak English "very well"	0	0.00%

APPENDIX A

Speak English less than "very well"	0	0.00%
Russian:	51	0.07%
Speak English "very well"	47	0.07%
Speak English less than "very well"	4	0.01%
Polish:	27	0.04%
Speak English "very well"	23	0.03%
Speak English less than "very well"	4	0.01%
Serbo-Croatian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Slavic languages:	28	0.04%
Speak English "very well"	0	0.00%
Speak English less than "very well"	28	0.04%
Armenian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Persian:	25	0.04%
Speak English "very well"	25	0.04%
Speak English less than "very well"	0	0.00%
Gujarati:	147	0.21%
Speak English "very well"	95	0.14%
Speak English less than "very well"	52	0.07%
Hindi:	113	0.16%
Speak English "very well"	61	0.09%
Speak English less than "very well"	52	0.07%
Urdu:	24	0.03%
Speak English "very well"	5	0.01%
Speak English less than "very well"	19	0.03%
Other Indic languages:	52	0.07%
Speak English "very well"	52	0.07%
Speak English less than "very well"	0	0.00%
Other Indo-European languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Chinese:	58	0.08%

APPENDIX A

Speak English "very well"	19	0.03%
Speak English less than "very well"	39	0.06%
Japanese:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Korean:	128	0.18%
Speak English "very well"	10	0.01%
Speak English less than "very well"	118	0.17%
Mon-Khmer, Cambodian:	189	0.27%
Speak English "very well"	49	0.07%
Speak English less than "very well"	140	0.20%
Hmong:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Thai:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Laotian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Vietnamese:	991	1.42%
Speak English "very well"	230	0.33%
Speak English less than "very well"	761	1.09%
Other Asian languages:	156	0.22%
Speak English "very well"	33	0.05%
Speak English less than "very well"	123	0.18%
Tagalog:	73	0.10%
Speak English "very well"	66	0.09%
Speak English less than "very well"	7	0.01%
Other Pacific Island languages:	18	0.03%
Speak English "very well"	0	0.00%
Speak English less than "very well"	18	0.03%
Navajo:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%

APPENDIX A

Other Native North American languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Hungarian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Arabic:	118	0.17%
Speak English "very well"	118	0.17%
Speak English less than "very well"	0	0.00%
Hebrew:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
African languages:	98	0.14%
Speak English "very well"	79	0.11%
Speak English less than "very well"	19	0.03%
Other and unspecified languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%

Source: 2011-2015 American Community Survey 5-Year Estimates

**Limited English Proficiency (LEP) Assessment
City of Camden Community Development Block Grant (CDBG Program)**

The City of Camden surveyed their staff using the questions below in order to assess the frequency of contact by persons of Limited English Proficiency (LEP). Surveys were completed by seven staff members and were submitted by March 16, 2020.

Survey questions are listed below, followed by the survey results:

Question (Mark Answer with an X)	Never	Rarely	Occasionally	Frequently
	(0 times per year)	(1 time per year)	(2-6 times per year)	(7+ times per year)
1) How many times (per year) do you encounter populations seeking assistance that speak little to no English?				
2) How many times (per year) is language assistance requested?				

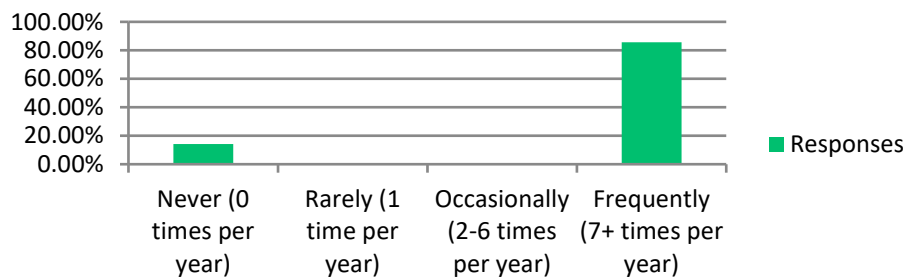
If language assistance has been requested, please indicate type of language assistance provided (please circle all that apply):	Language Interpreters	Translated Documents
	Audio-visual Materials	Other (Please Specify): _____

What languages have translation services/translated documents have required assistance (please circle all those that apply):	Spanish	German	Polish	Other (Please Specify): _____ _____ _____ _____ _____ _____ _____ _____ _____
	French	Yiddish	Armenian	
	Italian	Greek	Persian	
	Portuguese	Russian	Gujarati	
	Korean	Laotian	Arabic	
	Cambodian	Vietnamese	Hebrew	
	Hmong	Tagalog	African Languages	
	Thai	Hungarian	Chinese	
	Hindi	Urdu	Japanese	

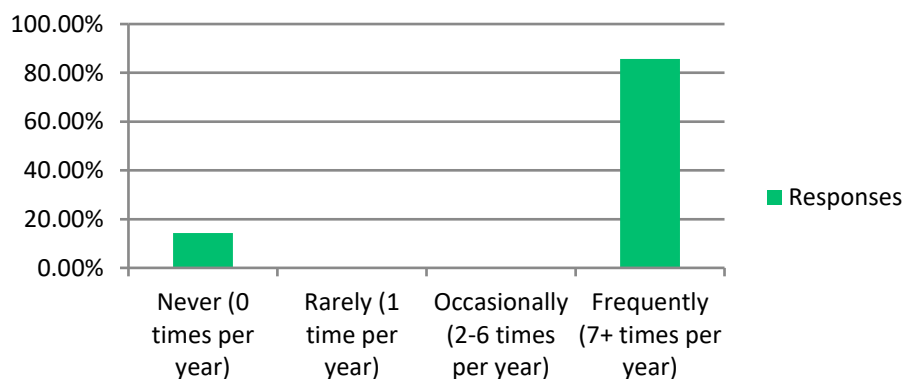
Limited English Proficiency (LEP) Assessment Results
 City of Camden Community Development Block Grant (CDBG Program)

Below are the results of the City of Camden LEP Assessment.
 There were seven City staff that responded to the survey.

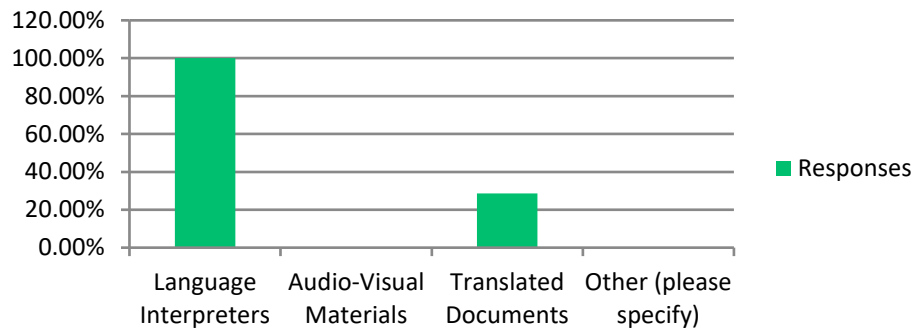
How many times (per year) do you encounter populations seeking assistance that speak little to no English?



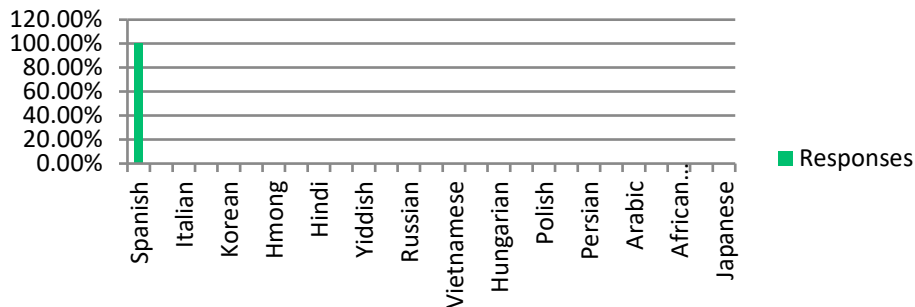
How many times (per year) is language assistance requested?



If language assistance has been requested, please indicate the type of language assistance provided (please select all that apply)



What languages have translation services/translated documents that have required assistance? (please select all that apply)



- | | |
|---|------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p> | 1. Arabic |
| <input type="checkbox"/> <p>Խոսողո՞ւմ ե՞սք նշո՞ւմ կատարե՞ք այս քանակուսու՞մ, եթե խոսո՞ւմ կա՞մ կարողո՞ւմ եք հայերեն:</p> | 2. Armenian |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p> | 3. Bengali |
| <input type="checkbox"/> <p>ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p> | 4. Cambodian |
| <input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p> | 5. Chamorro |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p> | 6. Simplified Chinese |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p> | 7. Traditional Chinese |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p> | 8. Croatian |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p> | 9. Czech |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p> | 10. Dutch |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p> | 11. English |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p> | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această casuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

Document	PROGRAM		
	First-Time Homebuyer Program	Housing Improvement Program	Emergency Repair Program
Program Brochure	TBT	TBT ¹	TBT ¹
Application for Assistance	TBT	TBT	TBT
Program Policy Guidelines	TBT	TBT	TBT
Acknowledgement of Receipt of Policy Guidelines	TBT	TBT	TBT
Individual Client Correspondence	AN	AN	AN
Mortgage Document	AN	AN	-
Mortgage Note Document	AN	AN	-
Declaration of Covenants and Deed Restrictions	AN	-	-
Acknowledgement of No Prior Home Ownership	AN	-	-
Homeowner Agreement	-	AN	AN
Construction Agreement	-	AN	AN
Homeowner's Right of Rescission	-	AN	

TBT To Be Translated Now

AN As Needed

¹ When developed