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## **BlueCare Civil Rights and Diversity**

### **Additional Information about Limited English Proficiency ( LEP ) and the Provider's Obligation**

#### **Title VI Four Factor Analysis**

##### **Four Factor Analysis used in determining a provider's obligation**

1. Number or proportion of LEP persons eligible to be served
2. Frequency of contact
3. Importance of service or benefit
4. Costs and resources

When utilizing the Four Factor Analysis, the organization should first attempt to determine how many LEP persons are eligible to be served, or likely to be affected by the program being offered by the organization. Useful sources may be: encounter data, Census data, school systems, state and local governments and community organizations. A hospital with a significant number of Spanish speaking patients may find it necessary to have immediate oral interpreters available. They may even consider hiring bilingual staff to assist patients.

- Secondly, the organization should determine frequency of contact with LEP individuals. If for example, a dentist's office who encounters one Kurdish speaking patient once per month may only need to utilize a telephone interpreter service.
- Thirdly, the organization should determine the importance of the program, activity or service being offered.
  - What are the possible consequences if the program is not effectively communicated?
  - Could denial or delay of the service or information have a serious, life- threatening impact?
- Lastly, the organization should consider the cost of providing language services and examine available cost-effective resources.