SAMPLE

Language Access Policy

INSERT AGENCY NAME is committed to complying with all civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI), which requires us to make sure individuals with limited English proficiency (LEP) have meaningful access to our housing programs and activities. The term LEP doesn’t refer to people who are bilingual, but rather individuals who have a limited ability to read, write, or understand English well or at all.

The purpose of this plan is to ensure that we provide individuals with LEP meaningful access to our housing programs and activities. In preparation for writing this plan and in order to identify the specific needs for LEP case management applicants we conducted a needs assessment using the four-factor analysis provided in the Department of Housing and Urban Development’s Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.

In accordance with this four-factor analysis, the agency’s assessmentbalanced the following:

1. The number or proportion of LEP persons served or encountered in the eligible service population. (As instructed in the guidance for the purpose of determining those LEP persons “served or encountered”, we included those persons who would be served or encountered if the persons received adequate outreach and we provided sufficient language services);
2. The frequency with which LEP persons come into contact with each site;
3. The nature and importance of the program, activity or service provided by the site; and
4. The resources available and costs to the site. Please note that to the extent possible, we have tried to reduce the site costs by identifying the resources available throughout our management company and making them available to each site.

**LEP Populations to be Served or Encountered and the Frequency of Encounters**

INSERT AGENCY NAME recognizes that its staff has, and will continue to have, significant contact with LEP persons who speak and read INSERT LANGUAGES.throughout the occupancy cycle: application, occupancy and move-out process (and, if applicable, eviction). This includes the following:

ADJUST FOR YOUR PROJECT

1. The application process, including telephone communication, assistance in filling out the application, the interview, and the signing of all requisite forms and the lease;
2. Standard interactions with a resident, including but not limited to, recertification, maintenance checks, standard maintenance requests and emergencies, newsletters, notifications of events, lease violation notices, and social events;
3. The move-out process; and, if applicable;
4. Eviction proceedings.

We also recognize that based on the four factor analysis we conducted, our efforts need to reach LEP persons who speak INSERT LANGUAGES.

**Language Assistance Measures**

Competent Bilingual Staff

INSERT AGENCY makes every effort to hire staff that can communicate with residents. A significant consideration when hiring staff for a site (managerial as well as case management) is whether the applicant can competently provide language assistance to LEP residents at the site. One housing case management staff position is designated as bilingual and every effort has been made to match their language skills with the needs of LEP residents. Our preference is to meet the needs of our LEP applicants and residents through direct language assistance with our staff throughout their care. When this isn’t possible we are committed to meeting our LEP applicants and residents’ needs through other methods.

We understand that it isn’t enough for staff to be “bilingual” when communicating with our LEP applicants and residents. Some bilingual persons may be able to effectively communicate in two languages but aren’t competent to interpret between English and that language. We also recognize that the skills of interpreting and the skills used for translating aren’t the same. A person may be capable of one and not the other. We will make every effort to offer bilingual staff interpreter training and professional development opportunities to ensure that communication is effective and accurate.

Oral Language Services In Addition To Bilingual Staff

Our goal is to provide meaningful access to our programs for individuals with limited English proficiency in a timely manner. As stated above, we often use competent bilingual staff to act as interpreters for applicants and tenants.

We do recognize however that under some circumstances it isn’t appropriate for staff to serve as interpreters.

Informal Interpreters

Applicants and Residents who have limited English proficiency often choose to bring an informal interpreter with them to assist in communication, including but not limited to the LEP client’s family members, friends, legal guardians, service representatives or personal advocates. In such instances, site staff must remember the following:

* LEP persons who bring an informal interpreter with them must be reminded that INSERT AGENCY is willing to pay for free language interpretation. If the LEP person prefers the informal interpreter, he/she will be permitted to do so at his/her own expense.
* In emergency situations that are not reasonably foreseeable, INSERT AGENCY may need to temporarily rely on informal interpreters. Reliance on children is especially discouraged unless there is an extreme emergency and no competent interpreters are available.

Telephone Interpreter Service Line

All site personnel have been provided information on how to access and utilize Language Line Services, which can provide immediate interpreter services in over 140 different languages. This can be very helpful when an LEP applicant calls or comes in and no other interpreter is available to assist. This service is extremely costly. Its effectiveness can also be limited when staff need to discuss documents unless the telephonic interpreter is provided adequate time to review the documents prior to the interpreter service.

Written Translation Services

INSERT AGENCY will provide written translation of vital documents into the language of each frequently encountered LEP group who is currently being served by the housing case management department.