



## Central Texas Housing Consortium

### **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

#### **A. PLAN STATEMENT**

The Central Texas Housing Consortium (CTHC) has adopted this plan to provide access to its programs and activities by persons with Limited English Proficiency (LEP). A Limited English Proficient (LEP) person is a person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English. In accordance with federal guidelines, CTHC will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing and other CTHC programs.

#### **B. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS**

CTHC will periodically assess and update the following four-factor analysis, including but not limited to:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by CTHC.
2. The frequency with which with LEP persons using a particular language come into contact with CTHC.
3. The nature and importance of the CTHC program, activity or service to the person's life.
4. CTHC's resources and the cost of providing meaningful access.

#### **C. LANGUAGE ASSISTANCE**

1. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language; and/or translation, which means the written transfer of a message from one language into another language. CTHC will determine when interpretation and/or translation are needed and are reasonable.
2. CTHC has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
3. Translation of Documents
  - a. CTHC will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in an LEP group and other relevant factors. CTHC will undertake this examination when an eligible LEP group constitutes 5% of an eligible client group (for example, 5% of households living in CTHC's public housing) or 1,000 persons, whichever is less.
  - b. If CTHC determines that translation is necessary and appropriate, it will translate selected mailings and documents of vital importance into that language.
  - c. CTHC will consider technological aids such as Internet-based translation services.

- d. CTHC will use/purchase documents, such as HUD forms and TAA forms, that are available in other languages as needed.

#### 4. Audio-visual Materials

CTHC will use reasonable efforts to produce or obtain multiple translations of audio-visual materials it uses to inform or educate applicants, residents and other client groups.

#### 5. Formal Interpreters

- a. When necessary to provide meaningful access for LEP clients, CTHC will provide qualified interpreters, including CTHC bilingual staff and contract vendors. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- b. CTHC may require a formal interpreter to certify to the following:
  - (1) The interpreter understood the matter communicated and rendered a competent interpretation.
  - (2) The interpreter is covered by the Privacy Act and will not disclose non-public data without written authorization from the client.
- c. Formal interpreters shall be used at the following:
  - (1) Formal hearing for denial of admission to public housing;
  - (2) Informal settlement conferences and formal hearing for termination of public housing.
- d. CTHC maintains a list of qualified, bilingual employees. They will provide assistance to CTHC staff and LEP clients as part of their regular job duties.

#### 6. Informal Interpreters

- a. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. CTHC staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. Issues such as confidentiality, competency or conflict of interest will be considered.
- b. An LEP person may use an informal interpreter of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by CTHC. If possible, CTHC should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- c. If an LEP client wants to use their own informal interpreter, CTHC reserves the right to also have a formal interpreter present.

#### 7. Outside Resources

- a. Outside resources may include paid interpreters, community volunteers or CTHC residents.
- b. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

## **D. MONITORING**

1. CTHC will review and revise this LEP Plan annually. The review will include:
  - a. Reports from CTHC's employees on the number of CTHC clients who are LEP.
  - b. A determination as to whether 5% or 1,000 persons from a CTHC client group speak a specific language, which triggers consideration of document translation needs as described above.
  - c. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.
2. The Resident Advisory Board (RAB) will be asked to review the LEP Plan annually as part of updating the Agency Plan.

## **E. LEP PLAN DISTRIBUTION AND TRAINING**

The LEP Plan will be:

1. Distributed to all CTHC department supervisors.
2. Available in CTHC Management Offices.
3. Posted on CTHC's website.
4. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.