

ABC Housing Authority ABC Multi-Housing Provider

City of ABC Community Development Block Grant (CDBG)

Language Assessment

Four – Factor Analysis

In order to determine the estimated needs of Limited English Proficient (LEP) persons in the jurisdiction of the ABC _____, the ABC _____ conducted the following analysis:

Factor 1 – Number or proportion of LEP persons served or encountered in the eligible service area

The ABC _____ obtained information from the U.S. Census Bureau's American Factfinder website as recommended by HUD in order to gather data about the jurisdiction's overall population, as well as the population of LEP persons within the jurisdiction and the primary languages spoken. This data indicated the following:

Total population 5 years and over	76,380
Total LEP population 5 years and over	4,672
Spanish speaking LEP population 5 years and over	3,118
Asian and Pacific Islander language speaking LEP population 5 years and over	964
Other Indo-European language speaking LEP population 5 years and over	518
Other language speaking LEP population 5 years and over	72

The above data demonstrates that more than two-thirds of the jurisdiction's LEP population is Spanish speaking and that no other language meets the 5% or 1,000 person threshold for requiring written translation of vital documents. While the Asian and Pacific Islander language speaking LEP population is close to the threshold, the above numbers represent persons 5 years of age and older, and the ABC _____ is confident that the actual number of

potential clients is significantly lower due to the fact that children would not be seeking ABC _____ services.

The ABC _____ also completed in an informal, in-office survey to determine how many LEP persons visited or called the office, and what was their primary language, over a one-month period. This informal survey revealed that while there was significant number of Spanish-speaking LEP persons contacting the ABC _____, there were no LEP persons who spoke languages other than Spanish.

In addition, the ABC _____ is part of the City of Somewhere, which has conducted two Customer Service survey in the last six years. The surveys were available in the main lobby of the ABC _____ office for anyone to complete. The ABC _____ did not receive any comments indicating a lack of availability of LEP assistance.

Fact 2 – Frequency of contract with the program

Through past experiences, the ABC _____ determine that on average, there are 2-3 Spanish speaking LEP persons contacting the ABC _____ on a daily basis for information or assistance. Because of this, the ABC _____ is committed to maintaining bilingual staff serving in both reception and case management. The ABC _____ bilingual management staff in order to resolve higher level concern of Spanish speaking LEP persons.

Contacts with LEP persons who speak other languages are infrequent.

Fact 3 – Importance of service, information, program or activity

The services provided by the ABC _____ are important as they relate to a client's needed for or continued provision of, affordable housing.

Factor 4 - Costs versus resources and benefits

Because the ABC _____ has Spanish speaking staff, it is cost effective for the ABC _____ to provide Spanish language translation of all vital documents and many others that while not vital, may be beneficial to a client.

The ABC _____ will utilize any documents provided by HUD in languages other than English.

The ABC _____ will seek to retain the services of a professional interpretation service to provide oral interpretation in languages other than Spanish as needed.

ABC Housing Authority's

ABC Multi-Family Housing Provider's City of ABC Community Development Block Grant (CDBG)

Language Assistance Plan

I. Introduction

The ABC _____ is committed to providing equal opportunity housing in a non-discriminatory manner, and in complying fully with all Federal, State and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. This includes complying with Title IV of the Civil Rights Act of 1964 to ensure meaningful access to programs and activities by Limited English Proficient (LEP) persons.

The purpose of this Language Assistance Plan (LAP) is to identify how the ABC _____ will ensure its methods of administration will not have the effect of subjecting LEP persons to dissemination because of their national origin, and to ensure LEP persons have full access to _____ programs services.

II. Who is LEP?

For the purposes of this LAP, anyone whose primary language is not English, and has a limited ability to read, write, speak or understand English may be LEP.

The ABC _____ 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).

III. Identification of Languages Needs Within the Jurisdiction

It was determined through review of the U.S. Census Bureau's American Fact Finder for the city of ABC, as recommended by the U.S. Department of Housing and Urban Development (HUD), that Spanish was the only language to meet the 4 factor analysis criteria (1 – Number or proportion of LEP persons served or encountered in the eligible service area; 2 – Frequency of

contract with the program; 3 – Importance of service, information, program or activity; 4 - Costs versus resources and benefits) requiring translation of vital documents, this was supported by the volume of encounters with LEP persons where virtually all were Spanish speaking. According to Fact Finder, there are 3,118 Spanish-speaking persons over the age of five years in ABC who speaks English less than very well. Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be serviced or likely to be affected or encountered. The ABC _____ has determined that because there are more than 1,000 Spanish-speakers in ABCville who speak English less than very well, the ABC _____ will translate vital documents into Spanish.

The next largest LEP populations were persons who speak Asian and Pacific Islander Languages and identified themselves as speaking English “less than well”. This is a population of 964, which is 1% of the ABC population of 76,380 of people over the age of five years, and less than 1,000 people. In addition, this number is a combination of many different languages, which signifies that when each individual language is separated from this group, the percentage of LEP persons in this language group is even less than 1%. The ABC _____ also took into consideration that while there are 964 LEP persons in this population, not all of them will seek assistance from the ABC _____ program and services as some of them are children and others will not need the type of services provided by the ABC _____. The ABC _____ has determined that because there is less than 1% or 1,000 people in any of the Asian or Pacific Islanders languages, it will not translate vital documents into these languages. However, the ABC _____ will provide oral interpretation as needed to LEP persons requesting such services.

Other languages groups in ABC had few LEP persons and therefore did not meet the threshold to require written translation of vital documents into those languages. The ABC _____ will provide oral interpretation as needed to LEP persons requesting such services.

IV. Written Translation

As stated above in Section III, the ABC _____ has determined that because there are more than 1,000 Spanish-speakers in ABC who speak English less than very well, the ABC _____ will translate vital documents into Spanish. As of the date of the creation of this LAP, Spanish is the only language into which vital documents will be translated. This is subject to change upon review of the LAP as discussed below.

A. Vital Documents

HUD has defined “vital documents” to be those documents that are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and LEP persons specifically. In general, the ABC _____

will attempt to translate all letters sent to program applicants and participants to Spanish. However, the following is a list of documents the ABC _____ has determined to be vital and has committed to translating into or providing HUD-approved version in Spanish:

Already Translated or Have Translations Provided by HUD

Housing Choice Voucher, including Family Obligations
Letter of Informal Hearing
Informal Hearing Procedures
Informal Hearing Result
Instructions on Moving After Receiving/Giving Notice to Move
Notification of Pro-ration of Assistance Based on Non-Eligible Household Members
Repayment Agreement
Denial of Unit
Notification of Social Security Number Discrepancy
Proposal of Termination of Program Participation
Letter Confirming Voluntary Termination
Brochure Explaining Rights Under the Americans with Disability Act
Brochure Explaining Family Self-Sufficiency Program
Brochure Explaining Housing Choice Voucher Home Ownership Program
Family Obligations Checklist
Authorization to Release Information with Privacy Act Statement
Brochure Regarding Housing Discrimination
Family Self-Sufficiency Contract
Request for Tenancy Approval

To Be Translated

Brochure Explaining Waiting List

V. Oral interpretation

The ABC _____ will make every effort to provide oral interpretation for all its clients who have identified themselves as LEP and request services.

A. Bilingual Staff

The ABC _____ employs bilingual, Spanish-speaking staff in several positions, including program management, to ensure there are sufficient personnel available to assist Spanish-speaking LEP persons when needed. Currently the ABC _____ has four full-time Spanish-speaking staff and two part-time Spanish speaking staff. In addition, as part of the City of ABC, the ABC _____ has access to other bilingual City employees, including numerous Spanish-speaking staff, as well

as staff who speak German, Hindi, Punjabi, Urdu, Lithuanian, Tagalog, Ilokano and American Sign Language.

The ABC _____ staff, as well as other City of ABC bilingual employees, must take and pass a competency test in the other language in order to be designated as a bilingual person. This test includes being required to answer questions in the other languages as in an interview setting, serve as an interpreter in a role-play scenario and to translate written documents from English to the foreign language and from the foreign language to English. The current Program Administrator for the ABC _____ has also received training on professional interpretation.

B. Interpretation Services

When there is not an ABC _____ City staff person who speaks the LEP person's primary language, the ABC _____ will seek interpretation through a professional interpreter service.

In the event that the LEP person's primary language is not widely spoken and the ABC _____ is unable to locate a suitable interpreter through a professional interpreter service, the ABC _____ may resort to other methods such as seeking community volunteers. As a last resort in case where the ABC _____ is unable to find an acceptable interpreter within a time frame to effectively assist the client, the ABC _____ may use an online translation website, such as _____, in order to communicate via an in-office computer.

C. Informal Interpreters

The ABC _____ will generally discourage the use of family members or other informal interpreters, but will allow the use of an interpreter of the LEP person's choosing (including family members or a professional interpreter at the LEP person's own expense) when the LEP person rejects the ABC _____ free language assistance services. The ABC _____ will document the offer and the LEP person's subsequent rejection.

VI. Outreach

The ABC _____ will conduct outreach in a method that is inclusive of LEP persons identified through its bi-annual analysis. All Public Notices and marketing advertisements, such as notification of the availability of waiting list applications, shall be published in Spanish as well as English, and the ABC _____ will publish these in local Spanish media. The ABC _____ 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.

For clients, reception service is provide in Spanish, flyers and other communications posted in the lobby are translated into Spanish, and interviews and programs briefings are conducted in Spanish. Brochures advertising other available programs within the organization are also available in Spanish.

For clients who are LEP but are not Spanish-speaking, the ABC _____ Receptionist has a document created by the US Census Bureau translated into 38 different languages to use as a tool to identify the client's primary language. The ABC _____ will also seek translation of a notice announcing the availability of primary language assistance into as many languages as possible to be posted in the lobby. Until this is achieved, the ABC _____ will post the notice in English.

VII. Staff Training

The ABC _____ 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. This training shall include the types of services available to clients and how to access them. New employee will receive this LAP and the same training as part of their orientation.

VIII. Monitoring and Updating of This LAP

The ABC _____ will review/revise this LAP on an as needed basis, but no less than every two years 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 Plan will be reviewed to determine if the existing LEP services are sufficient to meet the needs of LEP clients.

Events that will be considered indicators of the need for a review of the LAP and will also be utilized to identify the need for LEP assistance in other languages include but not limited to LEP populations within the jurisdiction encountered or affected; frequency of encounters with LEP population; and continued availability of existing resources and the addition of new resources.