



Language Access Plan

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Language Access Summary

Federal and Department of Housing and Urban Development (HUD) Guidelines

On August 11, 2000, the President signed Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

In addition, the U.S. Department of Justice issued a Policy Guidance Document, “Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons With Limited English Proficiency”. This guidance sets forth the compliance standards recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons. Under the order, each federal agency was required to draft guidance specific to its recipients detailing general standards that would be applied.

On January 22, 2007, HUD issued guidelines that apply to any recipient of financial assistance including but not limited to public housing agencies and assisted housing providers.

These guidelines require Federal agencies to make all of their programs accessible to LEP persons. The LEP persons included in the guidelines are persons seeking housing assistance, or housing-related social services, current tenants, or parents and family members of those persons. The types of services and LEP communities targeted are based on a 4 Factor Analysis which includes:

1. The number of LEP persons eligible to be served or likely to encounter the program.
2. The frequency in which LEP individuals come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the grantee/recipient and costs.

The Housing Authority of the County of San Joaquin (Authority) evaluates the most commonly used languages in the Language Access Plan (LAP) annually. As a result of the current evaluation for Fiscal Year 2015-2016, the Housing Authority has designated the following languages:

- Spanish
- Vietnamese
- Mon-Khmer, Cambodian.

Compliance

Compliance with the 2007 HUD Guidelines are required. In addition, recipients are required to comply with all civil rights-related programs to provide meaningful access to LEP persons.

Complaints of discrimination filed with any Federal, State, or local agency based on national origin due to failure to provide meaningful access will be investigated by that agency.

Language Access Plan

Plan Statement

The Authority is committed to its mission to providing and advocating for affordable and attractive living environments for those of modest means and to give individuals and families an opportunity to continuously improve themselves and achieve self-sufficiency. In continuing with this mission, the Authority implemented the Language Access Plan (LAP) to ensure its programs and services are accessible to person(s) with Limited English Proficiency (LEP).

Identification of LEP Communities

LEP persons are those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English¹. When reviewing demographic data to analyze language assistance needs, it is important to focus on the languages spoken by those who are not proficient in English, and not simply individuals who speak multiple languages.

A 2014 review of the language proficiency data of the residents of San Joaquin County was conducted by the Authority which revealed 119,135 individuals in the Authority’s jurisdiction “speak English less than very well”.² Of the languages spoken by the residents of San Joaquin County and served by the Authority, there are three (3) predominant languages spoken which have been identified as:

Language
Spanish
Vietnamese
Mon-Khmer, Cambodian

1 January 22, 2007 HUD Guidance – Who is a Limited English Proficient Individual?

2 U.S. Census Bureau – 2014 – Language Spoken at Home by Ability to Speak English Who Speak English Less Than “Very Well”.

Language Assistance Measures

The Authority serves the LEP community with oral interpretation and written translation services for the Housing Choice Voucher (HCV), Public Housing (PH) and Multi-family Housing programs.

Oral Interpretation Services

The Authority serves LEP persons with oral interpretation services that include but are not limited to the following services:

- Bilingual staff.³
- Free interpretation services offered through contracted vendors.
- Special HCV and PH Briefings offered in LAP languages to LEP clients, upon request.

- LEP persons are allowed to use an interpreter of their own choosing who are at least 18 years of age or older.

Written Translation Services

The Authority will provide written translations of the documents determined to be “vital” to assist with access to the Authority’s housing programs by LEP persons. The written translations will be provided in the Authority’s designated languages for LEP clients. The Vital Documents list is attached hereto as Attachment A and was developed with consideration of the applicable State of California and Fair Housing laws.

Oral interpretation services will be used for all documents that are considered non-vital. Individualized documents containing important information will include a notice that language assistance services are available free of charge and oral interpretation services will be provided by bilingual employees and/or a contracted telephone vendor.

Accessibility to Non-Vital Programs

All housing related programs are considered vital to participants and the public. Other programs not directly related to housing or that may affect someone’s right to housing are considered non-vital. While the accessibility to non-vital programs is important, it is not subject to the same standards as housing programs. The Authority programs that are considered non-vital include:

- Section 3
- Community Development Initiatives
- Procurement
- Community Outreach

3 Bilingual Authority Staff are tested for accuracy using an independent third-party. New employees are subject to independent testing before serving as bilingual employees.

LEP assistance in accessing these programs will be offered through the use of bilingual employees and cost effective written translation programs available through the internet. Notice of these services will be provided on program documents issued to participants and the public.

Notice of Services for LEP Persons

The Authority will provide notice of the availability of its LEP services free of charge in the following locations:

- Posters in the lobby of all offices in multiple languages.
- “I Speak” cards are available for clients to self-identify their preferred language at all offices and as part of the pre-application and annual recertification process.
- The Authority’s website, including community notices, public notices, and other identified communications.
- Local community organizations representing LEP person(s) with housing opportunities.

Note: this Language Access Plan is available on the Authority's website and at all offices.

Implementation and Training

Responsible of Plan Implementation

While all of the Authority employees are responsible for ensuring LEP persons are provided adequate access to information, programs and resources, there are key individuals who specifically have the responsibility of implementing and monitoring this LAP.

The Management Services Unit (MSU) is responsible for ensuring that the Authority employees adhere to the plan and procedures to provide meaningful access. The MSU is also responsible for the oversight, performance, and implementation of the plan. The MSU evaluates the annual plan and analyzes the survey responses and complaints of LEP persons.

The Asset Managers, Director of Rental Assistance, Deputy Executive Director or his/her designee are responsible for implementing the LAP for the HCV, PH and Multi-Housing programs.

Implementation Timeframes

In October 2014, the Authority approved implementation of the LAP for the HCV, PH, and Multi-family Housing programs. In-house interpretation by the Authority employees, phone interpretation, and written translation of vital documents in the Authority designated languages will be incorporated and available to be provided to LEP person(s).

Training

All of the Authority employees may at one time or another come into contact with either a participant or member of the public who may be an LEP person. All of the Authority employees are trained on the following items:

- LAP policies and procedures.
- Types of services available to assist LEP persons.
- How to respond to LEP callers.
- How to respond to LEP visitors.

Staff who are in a position where contact with LEP persons is likely to occur more frequently are also trained on the following items:

- How to respond to written communication from LEP persons.
- How to access oral interpretation and written translation services.
- How to work effectively with interpreters.
- How to record and document language assistance services provided to clients.

Staff who serve as Bilingual translators are also trained on the following items:

- Interpreter Standards for Authority Bilingual Employees.
- How to record and document language assistance services provided to clients.

Monitoring and Updating the Plan, Policies, and Procedures

The Authority's LAP is monitored annually by the MSU. The MSU reviews:

- Languages in San Joaquin County that meet the threshold requirements.
- Languages most frequently used by program participants and public contacts.
- Implementation status.
- Effectiveness of services.
- The availability and cost of providing additional services.

Upon completion of the annual review, updates and revisions of the LAP are submitted for approval by the Asset Managers, the Director of Rental Assistance, the Deputy Executive Director or his/her designee.

Languages in San Joaquin County

To evaluate the languages in San Joaquin County that meet the threshold requirements, information is obtained from the U.S. Census Bureau, and any other resources available.

Languages Most Frequently Used by Program Participants and Public Contacts

To determine the languages most frequently used by program participants and public contacts, the Authority reviews data recorded in the client management system, by Bilingual Employees, and by site-level interaction with the public. The data is analyzed annually to determine the frequency and types of services being used. Reviewed data includes:

- Primary language used by person who contacted the Authority.
- Type of assistance provided during the encounter.
- LEP persons who chose to use their own interpreter and the age of interpreter.
- Number of LEP persons served.

This information will not only identify the languages that the Authority comes into contact with most frequently, but also assists with evaluating the effectiveness of the services provided.

Implementation Status

The status of implementing any services identified in this plan will be evaluated and adjusted as necessary.

Effectiveness of Service

The Authority's efforts will be monitored for effectiveness in providing meaningful access to housing programs. The effectiveness will be evaluated based on any responses received through the feedback from client(s) and/or complaints from individuals who were denied LEP services.

Complaints filed by individuals denied services due to limited English proficiency allows any member of the public, participant, or past participant to submit comments/feedback regarding the language access services provided by the Authority. The posters in the lobby of the HCV, PH, and Multi-family facilities provide options to file a complaint due to discrimination of persons with LEP. If the complaint is addressed to the Authority personnel, the complaints will be reviewed and followed up and/or addressed with the appropriate personnel to reach resolution. If necessary, adjustments to the LAP will be recommended.

Availability and Cost of Providing Additional Services

Each year, the MSU will research and solicit ideas for new ways to serve LEP persons. An evaluation of the availability, cost, and potential effectiveness of the additional services will be performed and adjustments to the plan will be recommended accordingly.

ATTACHMENT A

Vital Documents	Translated (Y/N)	Which Languages
Housing Authority Documents		
Annual Recertification Cover Notice	Yes	Hm, Sp, Viet, Tag, Khmer*
Annual Recertification Notice (appointment)	Yes	Hm, Sp, Viet, Tag, Khmer*
Annual Recertification Notice (no appointment)	Yes	Hm, Sp, Viet, Tag, Khmer*
Annual Recertification Packet	Yes	Sp
Application final disapproval letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Application Pending Status letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Application Review Denial Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Appointment Scheduled Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Certification of household membership form	Yes	Hm, Sp, Viet, Tag, Khmer*
Certification of no income form	Yes	Hm, Sp, Viet, Tag, Khmer*
Decrease bedroom size (annual) letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Decrease bedroom size (transfer) letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Denial to add family member form	Yes	Hm, Sp, Viet, Tag, Khmer*
Description of Programs	Yes	Hm, Sp, Viet, Tag, Khmer*
Family Obligations	Yes	Hm, Sp, Viet, Tag, Khmer*
HQS Initial Fail Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
HQS Inspection Fail Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
HQS Inspection notice	Yes	Hm, Sp, Viet, Tag, Khmer*
HQS Inspection Recheck notice	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Appointment Continuation Final letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Appointment Final letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Appointment Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Denial Letter 1	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Denial Letter 2	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Denial Letter 3	Yes	Hm, Sp, Viet, Tag, Khmer*
Informal Hearing Request Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Interim Request Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Live In Aide Certification Notice	Yes	Hm, Sp, Viet, Tag, Khmer*
Marijuana Act Notice	Yes	Sp, Viet
Notice of Rent Change letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Over-income letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Pending Information for annual letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Pending Information for annual no response	Yes	Hm, Sp, Viet, Tag, Khmer*
Pending Information for interim letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Pre- Application	Yes	Hm, Sp, Viet, Tag, Khmer*
Pre-Application Confirmation Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Reasonable Accommodation Decision Letter	Yes	Hm, Sp, Viet, Tag, Khmer*

Vital Documents	Translated (Y/N)	Which Languages
Housing Authority Documents		
Reasonable Accommodation Request Received Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Repayment Agreement	Yes	Hm, Sp, Viet, Tag, Khmer*
Request to Add Family Member Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Request to Reduce Family Composition Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Security Deposit Loan Agreement	Yes	Hm, Sp, Viet, Tag, Khmer*
Voucher Expiration Letter	Yes	Hm, Sp, Viet, Tag, Khmer*
Waiting List Update Request Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Welfare Consent Form	Yes	Hm, Sp, Viet, Tag, Khmer*
Debts Owed Form (Form 52675)	Yes	Sp, Khmer
HAP contract (Form 52641)	Yes	Hm, Sp, Viet, Khmer
Privacy Act Notice (Form 9886)	Yes	Hm, Sp, Viet, Tag, Khmer
Request for Tenancy Approval (Form 52517)	Yes	Hm, Sp, Viet, Tag, Khmer
Supplement to Application (Form 92006)	Yes	Sp, Viet, Tag, Khmer
Tenancy Addendum (Form 52641 A)	Yes	Hm, Sp, Viet, Tag, Khmer
Voucher (52646)	Yes	Hm, Sp, Viet, Tag, Khmer
A Good Place to Live	Yes	Hm, Sp, Viet, Khmer
Domestic Violence Certification	Yes	Hm, Sp, Viet, Tag, Khmer
FHEO Housing Discrimination Brochure	Yes	Sp, Viet
Fact Sheet - How Rent is Determined	Yes	Sp, Viet
FSS Contract of Participation (Form 52640)	Yes	Hm, Sp, Khmer
EIV Brochure	Yes	Sp, Tag
Equal Opportunity Brochure	Yes	Sp, Viet, Tag, Khmer

Hm=Hmong; Sp=Spanish; Viet=Vietnamese; Tag=Tagalog; Khmer=Khmer language of Cambodian

* Housing Authority documents translated in Khmer completed November 17, 2014