

Littleton Housing Authority

Limited English Proficiency (LEP) Plan

I. PLAN STATEMENT

The Housing Authority of the City of Littleton (LHA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines, the LHA will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8 New Construction, Section 8 Housing Choice Voucher Program and other LHA programs.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

Meaningful access is free language assistance in accordance with federal guidelines. The LHA 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 the LHA.
2. The frequency with which LEP persons using a particular language come into contact with the LHA.
3. The nature and importance of the LHA program, activity or service to the persons' life.
4. The LHA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

III. LANGUAGE ASSISTANCE

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to LHA programs and activities.

2. 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. The LHA will determine when interpretation and/or translation are needed and are reasonable.
3. LHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and the LHA determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, the LHA will make reasonable efforts to provide free language assistance. If reasonably possible, the LHA will provide the language assistance in the LEP client's preferred language.

The LHA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

The LHA will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

IV. TRANSLATION OF DOCUMENTS

1. The LHA will weigh the cost 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 a LEP group and other relevant factors. The LHA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group (for example, five percent of households living in the LHA's public housing)..
2. If the LHA determines that translation is necessary and appropriate, the LHA will arrange to translate the public housing lease and selected mailings and documents of vital importance into that language.

3. As opportunities arise, the LHA may work with other housing authorities to share the costs of translating common documents, which may include language groups, which do not (yet) reach the threshold level in the LHA's client population.
4. The Department of Housing and Urban Development (HUD) should provide prototype translations of standard housing documents in multiple languages in a timely fashion. HUD should provide this service to local housing authorities and the hundreds or thousands of other HUD grantees whose limited resources hinder their LEP efforts.
5. The LHA will consider technological aids such as Internet-based translation services, which may provide helpful, although perhaps not authoritative, translations of written materials.

V. *FORMAL INTERPRETERS*

1. When necessary to provide meaningful access for LEP clients, the LHA will provide qualified interpreters, including LHA bilingual staff and contract vendors, if available. 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.
2. The LHA may require a formal interpreter to certify to the following:
 - a. The interpreter understood the matter communicated and rendered a competent interpretation.
 - b. The interpreter will not disclose non-public data without written authorization from the client.
3. Formal interpreters shall be used at the following:
 - a. Formal hearing for denial of admission to public housing or Section 8 New Construction;
 - b. Informal settlement conferences and formal hearing for termination of public housing or Section 8 New Construction.

- c. Hearings or conferences concerning denial or termination of Section 8 Housing Choice Voucher participation.
4. An LHA staff interpreter may not be a subordinate to the person making the decision.
5. Bilingual LHA employees, when available, can provide limited assistance to LHA staff and LEP clients as part of their regular job duties.

VI. *INFORMAL INTERPRETERS*

1. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. LHA staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
2. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the LHA. If possible, the LHA should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
3. If an LEP client prefers an informal interpreter, after the LHA has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
4. If an LEP client wants to use his or her own informal interpreter, the LHA reserves the right to also have a formal interpreter present.

VII. OUTSIDE RESOURCES

1. Outside resources may include community volunteers, LHA residents or Housing Choice Voucher/Section 8 participants.
2. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

VIII. MONITORING

1. The LHA will review and revise this LEP Plan from time to time. The review will include:
 - a. Reports from the LHA's computer business systems on the number of LHA clients who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations.
 - b. Reports from the computer business systems and other sources listing the languages used by LEP clients.
 - c. A determination as to whether five percent from the LHA client group speak a specific language, which triggers consideration of document translation needs as described above.
 - d. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.
 - e. The resident Advisory Board (RAB) will be asked to review the LEP Plan annually as part of updating the Agency Plan.

IX. LEP PLAN DISTRIBUTION AND TRAINING

The LEP Plan will be:

1. Distributed to all LHA staff.
2. Available at the LHA Administrative Office at 5854 South Datura Street, Littleton, CO 80120

3. Posted on the LHA's website, www.littletongov.org.
4. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.

APPROVED BY:

**LITTLETON HOUSING AUTHORITY
BOARD OF COMMISSIONERS
Resolution 08-11
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