

**Cuyahoga Metropolitan Housing Authority
Housing Choice Voucher Program
Language Assistance Plan
February 2007**

FACTOR ONE:

The Number or Proportion of Limited English Proficient (LEP) Individuals to be Served or Likely to be Encountered

The service area of the Cuyahoga Metropolitan Housing Authority (CMHA) Housing Choice Voucher Program (HCVP) is Cuyahoga County, Ohio. The CMHA HCVP maintains records of only two ethnicity designations: Hispanic and non-Hispanic.

As of February 1, 2007, the HCVP had 273 Moderate Rehabilitation (Mod Rehab) contracts and 13,218 voucher contracts. Of these, 19 (7.0%) Mod Rehab families were Hispanic and 424 (3.2%) voucher program families were Hispanic. The combined programs had 443 (3.3%) Hispanic families.

The 2006 HCVP waiting list was comprised of 10,000 applicants. Of these, 498 (4%) were Hispanic.

Compared to year 2000 census statistics, 3.17% of Cuyahoga County, Ohio families are Hispanic, which is close to the CMHA percentage. The census data further indicate that 18% of Cuyahoga County Hispanic households speak the English language less than “very well”. Based upon that statistic, we project that approximately 80 current CMHA HCVP participant Hispanic households speak English less than “very well”.

Since CMHA does not maintain statistics on ethnicities other than Hispanic, we have only census data to guide us in determining the number of families who may have limited English proficiency in a language other than Spanish. Census data for Cuyahoga County indicate that in 2000, 88.92% of the population spoke only English and another 3.17% spoke Spanish at home. This accounts for nearly 93% of Cuyahoga County. The remaining 7% of families speaking a language other than English at home were comprised of 5.55% other Indo-European languages, 1.13% Asian languages, and 1.22% other languages. It should be noted that one cannot assume from these statistics that families speaking another language at home speak only that language, or speak English less than “very well”.

Based upon these statistics, Spanish has been identified as the main language the CMHA HCVP should reasonably focus upon at the present time. Spanish is the most prevalent second language in Cuyahoga County.

FACTOR TWO:

The Frequency with which LEP Individuals Come Into Contact with the Program

The minimum frequency of contact for the total 13,491 subsidy recipients (combined Mod Rehab and voucher programs) includes initial application, voucher briefing, yearly annual re-exam and yearly annual inspection. Some participants may have one or more additional re-exams (interim re-exams) to report changes in income or family composition. In addition, some families receive emergency inspections for health, safety or life threatening conditions in their housing unit that occur prior to the annual inspection. Some applicants/participants may have informal reviews, informal hearings, may attend a movers briefing, or may have various questions regarding the program throughout the year.

FACTOR THREE:

The Nature and Importance of the Program, Activity or Service Provided by the Program

CMHA's mission is to be a leader in providing safe, quality, affordable housing for individuals and families of Cuyahoga County. The main eligibility factor for the HCVP is income limits established by the Department of Housing and Urban Development (HUD). Simply stated, the CMHA HCVP provides, via housing subsidy, safe, decent and sanitary housing to low and moderately low-income families.

Housing is a basic human need, the lack of which can have serious or life-threatening implications for any individual. Therefore, the CMHA HCVP takes its responsibility as a houser of low to moderately low income families very seriously.

Compulsory HCVP activities include the application/eligibility process including the voucher briefing, the yearly re-exam and inspection, and attendance at informal reviews or hearings when a family is denied assistance or is proposed for termination from the program.

FACTOR FOUR:

Resources Available to the Recipient and Costs

The CMHA HCVP has the following resources available, to ensure that LEP individuals have meaningful access to the HCVP:

- Bilingual Staff
- Interpreting Services
- Translating Services
- Written Notices to LEP Participants and Applicants
- Tag Lines, Indicating the Availability of Language Assistance on Vital Documents

- Bilingual Building Signage in Common Areas
- Use of “I Speak” Cards
- Use of Spanish Telephone Option

**The CMHA Limited English Proficiency Plan
February 2007**

CMHA Board-Approved Policy:

The Administrative Plan requires that

- “The PHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial status, handicap or disability” (page 1-5).
- “The Housing Authority has bilingual staff to assist non-English speaking families in Spanish, and may translate documents into Spanish” (page 1-8).
- “The PHA will publicize and disseminate information to make known the availability of housing assistance and related services for very low income families when the waiting list is open. When the PHA’s waiting list is open, the PHA will publicize the availability and nature of housing assistance for very low-income families in a newspaper of general circulation, minority media, and by other suitable means. Notices will also be provided in Spanish” (page 1-10).
- “When the PHA opens the waiting list, the PHA will advertise through public notice in local newspapers, minority publications and media entities, location(s), and program(s) for which applications are being accepted: The Plain Dealer, Call and Post, Nuevos Horizontes, and Sun Newspapers, and other print media whose distribution is within the PHA’s jurisdiction” (page 3-1).

Goal:

The goal of the CMHA HCVP Limited English Proficiency Plan is to ensure that all individuals (potential applicants, applicants and participants), regardless of primary language spoken, have meaningful access to housing services.

Identification of LEP Population:

The identification of the LEP population for the CMHA HCVP is indicated above, in Factor One.

Language Assistance Measures:

- The CMHA HCVP hires and utilizes bilingual staff as interpreters. As of February 2007, there were seven bilingual staff. Of these, four speak Spanish, two speak Nigerian, and one speaks Sri Lankan. The ability to speak more than

one language is and will continue to be an important factor in making staff hiring decisions.

- The CMHA HCVP will contract with a professional interpreting service no later than April 30, 2007. This will ensure that interpreting services are available when bilingual staff are not on duty, or when an LEP individual requires service in a language other than what staff interpreters are able to provide.
- A written notice will be provided to all HCVP participant and waiting list families who indicate their ethnicity as Hispanic, notifying them that free assistance is available to limited-English proficient families. The notice will be in English and Spanish. This will be completed by June 30, 2007.
- Since the combined programs (voucher and Mod Rehab) have a combined total of 3.3% Hispanic families, and since, based upon census statistics, CMHA projects that approximately 80 Hispanic households speak English less than “very well” vital documents will be interpreted to individuals when the need arises.
- Professional translators may also be contracted, when needed, to ensure that accurate and clearly understandable information is disseminated to the public (for example, when a waiting list lottery is being conducted).
- Tag lines will be posted on all vital documents that free interpretation of vital documents is available from CMHA upon request by June 30, 2007. The tag lines will appear in English and Spanish.
- Families are permitted to use, at their own expense an interpreter of their own choosing (including a family member) in place of or as a supplement to the free services offered by CMHA.
- It is not the CMHA HCVP’s policy to *require* an individual to hire his or her own interpreter or use a family member as an interpreter. Utilizing a family member or friend as interpreter may violate the individual’s right to privacy, and therefore, the decision is left to the LEP individual.
- The offer of an interpreter and the recipient’s choice will be documented by staff in the computer note screen of the LEP individual. This procedure will be implemented no later than May 31, 2007.
- “I speak” cards will be utilized at the HCVP’s three front desks to encourage LEP individuals to self-identify.
- The HCVP telephone menu will be updated to offer an option, in Spanish, for a person to leave their name and number if they require assistance in Spanish. The call will be returned by one of the HCVP bilingual staff persons.

- Correspondence received in languages other than English will be referred to a Senior Manager for translation and response. The Manager of Administrative Affairs will provide assistance in procuring outside resources, if requested.
- In-person contacts by individuals speaking a language other than English will be referred to one of the bilingual staff for assistance. If the person speaks a language other than English, Spanish, Nigerian or Sri Lankan, a request will be made by the staff person to the Manager of Administrative Affairs to utilize the contracted interpreting service.
- Important building signs will be translated into Spanish no later than the end of December 2007.
- A written procedure for handling in-person, telephone, and mail contacts to the HCVP office will be developed by June 30, 2007.
- Bilingual staff may appear at community events throughout the year as the opportunity arises.

Training staff:

The HCVP Professional Development Instructor provides training to HCVP staff on limited-English proficiency, including its definition, sensitivity to limited-English proficient families, effectively serving limited-English proficient families, what the regulations require with regard to limited-English proficiency, and what CMHA policies and procedures require. Training sessions will be conducted prior to the end of 2007. (Training was also conducted when the August 2005 plan was implemented.)

Access to LEP Services:

The CMHA HCVP LEP Plan (February 2007) will be made available to the public via the CMHA HCVP web page by April 30, 2007. The August 2005 LEP Plan is already available on the web. The Plan is in English with interpretation of the document upon request.

Staff training, and staff requests for interpreting and translating services will be arranged by the Manager of Administrative Affairs.

Monitoring and Updating the Limited English Proficiency Plan:

Daily monitoring and implementation of the plan will be executed by the Senior Managers and Supervisors in each service area.

The Limited-English Proficiency Plan will be reviewed yearly by the Manager of Administrative Affairs to determine whether updates are needed. Updates will be executed by the Manager of Administrative Affairs and approved by the Housing Choice Voucher Program Director.

Complaints and comments regarding the HCVP LEP services will be forwarded to the Manager of Administrative Affairs. There have been no language access complaints or grievances since the LEP Plan was first implemented in August 2005.

CMHA has access to an important local resource, The Spanish American Committee, which is located in Ohio City, near the CMHA main offices. CMHA may seek assistance and advice from the Spanish American Committee, when required, in providing services that meet the need of Hispanic families who are limited-English proficient.

**HCVP Bilingual Staff
February 2007**

Name	Language	HCVP Division
Carolyn DeJesus	Spanish	Client Services
Mary Umar	Yoruba & Akwa (Nigerian)	Applications
Joanna Alicea	Spanish	Client Services
Leticia Smith	Spanish	Client Services
Dorivette Nolan	Spanish	Client Services
Dharshana Perera	Singalese (Sri Lankan)	Client Services
Abiodun (Emile) Pratt	Yoruba (Nigerian)	Contract Administration