



# Housing Authority

of the County of San Joaquin

**Language Access  
Plan  
FY2014-2015**

# Language Access Plan (LAP) FY2014-2015

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# Language Access Summary

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

On August 11, 2000, President William Clinton signed Executive Order 13166 – Improving Access to Services for Persons With Limited English Proficiency which took effect August 16, 2000 for the Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons With Limited English Proficiency. The order stated “each Federal agency shall work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.” Under the order, each federal agency was required to draft guidance specific to its recipients detailing general standards that would be applied.

In 2003, the U.S. Department of Housing and Urban Development (HUD) issued guidelines that were finalized on January 22, 2007. These guidelines apply to any recipient of HUD assistance including but not limited to public housing agencies and assisted housing providers.

Under the 2007 HUD Guidelines, recipients are required to make all of their programs accessible to Limited English Proficiency (LEP) persons. The LEP persons included in the guidelines include persons seeking housing assistance, seeking supportive services to become first-time homebuyers, seeking housing-related social services, training, or any other assistance from HUD recipients, current tenants, or parents or family members of these persons. The types of services and LEP communities targeted are based on a 4 Factor Analysis which includes:

1. The number of proportion of LEP persons eligible to be served or likely to be encountered by the program.
2. The frequency with 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.

## Compliance

Compliance with the 2007 HUD Guidelines is voluntary. However, recipients are required to comply with civil rights-related programs and provide meaningful access to LEP persons. Complaints of discrimination based on national origin due to failure to provide meaningful access filed with HUD will be investigated. Continued failure to provide meaningful access will result in the withdrawal of HUD funding.

# Language Access Plan

## Plan Statement

The Housing Authority of the County of San Joaquin (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 English<sup>1</sup>. 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 2010 review of the language proficiency of the residents of San Joaquin County was conducted by the Authority which revealed 29,175 individuals in the Authority jurisdiction who are eighteen (18) years and over who “speak English less than very well.”<sup>2</sup> Of the languages spoken by the residents of San Joaquin County, there are three (3) predominant languages spoken have been identified as:

| Language             | Number of Individuals in Population |
|----------------------|-------------------------------------|
| Spanish              | 110,160                             |
| Tagalog              | 11,035                              |
| Mon-Khmer, Cambodian | 9,350                               |

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

*2 U.S. Census Bureau – 2000 – Language Spoken at Home for the Citizen Population 18 Years and Over Who Speak English Less Than “Very Well”, for the United States, and Counties : 2000*

## Language Assistance Measures

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

### Oral Interpretation Services

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

- Bilingual staff<sup>3</sup>
- Free interpretation services offered through contracted vendors
- Special HCV and PH Briefings offered in Spanish to LEP clients, upon request
- LEP person are allowed to use an interpreter of their own choosing who are 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 designated languages for LEP clients. The Vital Documents list is included 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 noticing 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

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.

*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.*

## **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 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 website, community notices, public notices, and other identified communications.
- Notify local community organizations representing LEP person(s) about housing opportunities
- Language Access Plan (LAP) available on the Authority website and at all offices.

## **Implementation and Training**

### **Persons Charged with 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 Language Access Plan (LAP).

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

The Asset Managers, Director of Rental Assistance, Executive Deputy Director and/or Designee are responsible for implementing the Language Access Plan (LAP) for the Housing Choice Voucher (HCV) and Public Housing (PH) programs.

### **Implementation Timeframes**

#### **Written Translation**

In October 2014, the Authority approved the LAP implementation for the Housing Choice Voucher, Public Housing, 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 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 Employees are also trained on the following items:

- Interpreter Standards for the 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 Language Access Plan 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 Asset Managers, Director of Rental Assistance, Executive Deputy Director and/or 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 Language Assistance Designees. 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 encounter.
- LEP persons choice to use own interpreter and 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 the services 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 for denied individuals denied services for LEP persons.

The feedback from complaints filed by the public for individuals denied services for lack of English proficiency will allow any member of the public, participant, or past participant to submit comments regarding the language access services provided by the Authority. The posters in the lobby of the Housing Choice Voucher (HCV) and Public Housing (PH) 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 follow up and/or addressed with the appropriate personnel, and/or adjustments will be made to the plan.

#### 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           |
|--|------------------|---------------------------|
| <b>Housing Authority Documents</b>             |                  |                           |
| 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, Viet                  |
| Application final disapproval                  | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Application Pending Status                     | 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          | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Certification of no income                     | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Decrease bedroom size (annual)                 | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Decrease bedroom size (transfer)               | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Denial to add family member                    | 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      | Yes              | Hm, Sp, Viet, Tag, Khmer* |
| Informal Hearing Appointment Final             | 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                                  | Yes              | Sp, Viet                  |
| Notice of rent change                          | 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* |
| 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* |
|  |     |                           |

\* Housing Authority documents to be translated in Khmer will be completed November 17, 2014

| <b>HUD Documents</b>                       |     |                          |
|--|-----|--------------------------|
| Debts Owed Form (Form 52675)               | Yes | Sp, Khmer                |
| HAP contract (Form 52641)                  | Yes | Hm, Sp, Viet, Khmer      |
| Privacy Act form (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