Limited English Proficiency (LEP) Language Assistance Plan (LAP)

Purpose/Legal Authority:
The purpose of this plan is to ensure that clients of the City of Tucson Housing and Community Development Department (HCD) have meaningful access to program information and services even though they may be limited in their English language proficiency.

This plan was developed to serve HCD current clients, prospective clients, client family members, and other interested members of the public who do not speak, read, write or understand the English language at a level that allows them to interact effectively with HCD staff.

This policy is consistent with the Department of Housing and Urban Development's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons. It is also consistent with Executive Order 13166 and Title VI of the Civil Rights Act of 1964.

Definitions of terms:

- Limited English Proficiency (LEP) – Persons who are not proficient in English. Beneficiaries of our services may declare themselves to be LEP clients.
- Interpretation – Oral language services – The act of listening to something in one language and orally translating it into a different language.
- Translation – Written language services – The replacement of written text from one language into an equivalent written text in another language.

Identification of LEP Persons:
HCD takes into account HUD's Four Factor Analysis to assist in identifying LEP persons. The four-factor analysis includes:

1. Demography – Number or proportion of LEP persons served or encountered in the eligible service area—the greater the number or proportion of LEP persons in a language group, the more language services needed.
2. Frequency of Contact -- The frequency with which LEP individuals come in contact with the program—higher frequency requires more services.
3. Importance -- The nature and importance of a program, activity or services provided to the recipient.
4. Resources and Costs – larger recipients with larger budgets must provide a higher level of language services.

HCD will also utilize HUD's Safe Harbor guidance when deciding which languages will be translated into vital documents. These Safe Harbors apply only to Translation. Interpretation services will be provided to clients of all language groups, regardless of the size of the language group.

Provision of Services:
HCD has utilized a variety of data sources to determine community needs and the level of service needed within the community. These sources included polling of the client base at the annual renewal period and Census Data for the City of Tucson and Pima County. HCD will continue to poll clients to keep the data accurate.

1. *Language Identification Flashcards.* HCD will use Language Identification Flashcards (as provided by the City of Tucson Office of Equal Opportunity Programs) as is necessary to determine a client's language needs.

2. *Public Meeting and Event Notices.* The following statement will be added to public meeting and event notices:
   "For accommodations; materials in accessible formats; foreign language interpreters; and/or materials in a language other than English, please contact the (Your Dept., Contact Person, and Phone #) or call (520) 791-2639 for TDD at least 5 business days in advance."

3. *Public Documents and Brochures.* As HCD documents are reprinted, the following statement will be added in English and Spanish:

   "If you require an oral interpretation in a language other than English, please call (520) 791-4171."

   "Si requiere una interpretación oral en un idioma que no sea inglés, por favor llame al (520) 791-4171."

4. *Interpretation Services.* Upon client request HCD will provide oral interpretation utilizing bilingual employees, the City's contract interpreters (as posted at http://intranet.ci.tucson.az.us/office-equal-opportunity-programs) or the Language Line.

5. *Written Translations/Vital Documents.* Following HUD's Four Factor Analysis and Safe Harbor guidance, HCD will translate the following vital documents into Spanish.

   Public Housing:
   - Dwelling Lease
   - Grievance Form & Policy
   - Community Service Requirement Form
   - Eviction, Non-renewal Notices
   - General Release/Privacy Act
   - Family Self Sufficiency Contract & Addendum
   - Drug Use Addendum
   - Application Form
   - Reasonable Accommodation Policy & Request Form

   Section 8:
   - Income Questionnaire

Housing Discrimination Form
General Release
Appointment Letters
Ten Day Letters
Termination Letters
General Program Information
Special Program Documents
Brochures

Contracting, Homeownership & Rehab Programs

Outreach Materials
Application Forms
Fact Sheets
Contract Documents
Work Write Up
Lien
Subordination Policy
Lead Based Paint Information

El Portal Program:

Lease
Eligibility Forms
Outreach Materials
Instructions
Safety Notices
Inspection Notices
Eviction Documents

Outreach:
HCD will work with local refugee service providers, the local school districts, and other appropriate agencies when conducting outreach of services to eligible populations.

Sub-recipients:
Since all agencies that receive federal funding must provide this service to LEP clients these policies will also be applicable to sub-recipient groups that utilize federal funding. This means that the LEP guidelines will be incorporated into sub-recipient contract documents.

Staff Training:
All HCD staff who have contact with clients will be trained upon hiring and, thereafter on an annual basis, regarding their responsibilities to identify, notify, provide and document services for LEP clients or members of the public.

Evaluation:
Senior staff within HCD will conduct periodic site and/or desktop audits to verify that LEP clients who are in need of interpreter/translation services are actually receiving them. In addition, reviews that verify the accuracy of the translated materials will take place.

This Language Assistance Plan (LAP) will be reviewed at a minimum once a year in November and more often if needed, to ensure that the policies are up-to-date and accurate

Authorized:

Department Director

11/17/14
Date

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