



# Housing Connect

## Language Access Plan

FY 2022-2023



# Language Access Summary

As published in the Federal Register on January 22, 2007, “Most individuals living in the United States read, write, speak and understand English. There are many individuals, however, for whom English is not their primary language. For instance, based on the 2000 census, over 26 million individuals speak Spanish and almost 7 million individuals speak an Asian or Pacific Island language at home. If these individuals have a limited ability to read, write, speak, or understand English, they are limited English proficient, or ‘LEP.’ In the 2000 census, 28 percent of all Spanish and Chinese speakers and 32 percent of all Vietnamese-speakers reported that they spoke English ‘not well’ or not at all.”

HUD follows basic principles to ensure that LEP individuals have access to housing programs. “First, HUD must ensure that federally assisted programs aimed at the American public do not leave some behind simply because they face challenges communicating in English. This is of particular importance because, in many cases, LEP individuals form a substantial portion of those encountered in federally assisted programs. Second, HUD must achieve this goal while finding constructive methods to reduce the costs of LEP requirements on small businesses, small local governments, or small non-profit entities that receive federal financial assistance” (72 FR 2738).

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or “LEP,” and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

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 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.

This report outlines how Housing Connect provides language assistance to ensure that all persons have reasonable access to the agency's programs and activities.

# Housing Connect Language Access Plan

Housing Connect, a Public Housing Authority serving Salt Lake County is committed to its mission to *provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency and neighborhood revitalization*. In continuing with this mission, Housing Connect implemented the Language Access Plan (LAP) to ensure its programs and services are accessible to person(s) with Limited English Proficiency (LEP).

Housing Connect first implemented the 4 Factor Analysis, as HUD recommends. The first section is a compilation of the findings.

## 1. Four Factor Analysis

- a. *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program.*
  - i. The top three languages in Salt Lake County, UT in 2019 (according to Data USA) are as follows: 13.2% speak Spanish, 0.883% speak Ilocano, Samoan, Hawaiian, or Other Austronesian Languages, and 0.83% speak Chinese (Incl. Mandarin, Cantonese). Based off of this data, it is likely that Housing Connect will encounter individuals who speak Spanish.
- b. *The frequency with which LEP individuals come into contact with the program.*
  - i. Based on the data for Salt Lake County, UT and the nature of our work, it is highly likely LEP individuals come into contact with Housing Connect's programs.
- c. *The nature and importance of the program, activity, or service provided by the program to people's lives.*
  - i. Housing Connect considers most of our programs, especially as they pertain to housing subsidy, to be highly critical.
- d. *The resources available to the grantee/recipient and costs.*
  - i. Housing Connect prioritizes language accessibility for those that interface with the agency. To address community needs in relation to budget availability, Housing Connect currently has contracts with vendors that provide over-the-phone interpretation, in-person interpretation, and written translation. We advertise and recruit for bilingual staff as well.

## 2. 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. 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.

According to Data USA for 2019 in Salt Lake County UT, Salt Lake County is home to a population of 1.16M people. 21.3% of Salt Lake County, UT citizens are speakers of a non-English language, which is lower than the national average of 22%. The most common non-English language spoken in Salt Lake County, UT was Spanish. 13.2% of the overall population of Salt Lake County, UT are native Spanish speakers. 0.883% speak Ilocano, Samoan, Hawaiian, or Other Austronesian Languages, and .83% speak Chinese (Incl. Mandarin, Cantonese) as the next two common sets of language.

Based on the above data regarding Salt Lake County, 13.2% of the population are Spanish speaking and could be eligible to be served or encounter services through Housing Connect.

Housing Connect has determined that vital documents should be translated into Spanish to comply with HUD guidance. Translation of other documents, if needed, may be provided orally.

### **3. Identification of vital documents and services of Housing Connect**

Housing Connect's website ([www.housingconnect.org](http://www.housingconnect.org)) can be fully translated into Spanish along with Arabic, Chinese (Simplified), Dutch, French, German, Italian, Persian, Portuguese, Russian, and Somali with the click of a button.

Housing Connect relies on the translation of vital documents accessible on the U.S. Department of Housing and Urban Development's website located at: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/17lep](https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep). Forms related to Reasonable Accommodations can also be accessed in Spanish from Housing Connect's website.

### **4. Identification of Language Assistance Measures & Cost**

#### **Oral Interpretation Services**

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

- Bilingual staff
- Free interpretation services offered through contracted vendors
- Upon request, special HCV and/or PH Briefings offered in Spanish to LEP clients

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

### **Written Translation Services**

Housing Connect will provide written translations of the documents determined to be “vital” to assist with access to housing programs by LEP persons.

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.

### **5. Reviewing Budget**

All expenses in relation to translation or other relevant items connected to LEP will be documented and recorded by staff and submitted to the Accounting Department. The Chief Finance Officer will track all expenses and provide a yearly overview to the Special Projects and 504 Coordinator to ensure a balanced budget. The most recent overview was completed in February 2022.

### **6. Training Staff**

All Housing Connect employees may at one time or another come into contact with either a participant/tenant or member of the public who may be an LEP person. It is the expectation that employees use the resources available to them to communicate effectively with LEP persons. All of the employees at employee orientation 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 by their direct Supervisor/Manager/Director:

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

## **7. Notice of Services for LEP Persons**

Housing Connect 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
- Housing Connect 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 Housing Connect website and at all offices

## **8. Monitoring and Updating the Plan, Policies, and Procedures**

Housing Connect’s Language Access Plan will be monitored by Special Projects and 504 Fair Housing Coordinator on an annual basis. Included in this monitoring will be the following:

- Any new demographic information for Salt Lake County that could potentially meet the threshold requirements
- Languages most frequently used by program participants and public contacts. For current participants and tenants, at each annual re-exam, the primary language spoken in the household will be collected and entered into Housing Connect’s Elite data base. This data will provide accurate data at any point in time regarding LEP persons
- Implementation status and effectiveness of services performed through a short survey (as needed)
- The availability and cost of providing additional services

Upon completion of the annual review, updates and revisions of the LAP will be submitted for approval by the Chief Executive Officer, Chief Operating Officer, Chief Program Officer and Department Directors. Once approved the updated plan will be provided to the Resident Advisory Board for Approval and then to Housing Connect’s Board of Directors.