

## Wildwood Housing Authority

### Limited English Proficiency Policy

On August 11, 2000, Executive Order 13166 was issued titled “Improving Access to Services by Persons with Limited English Proficiency.” This Order requires federal agencies to assess and address the needs of eligible persons seeking access to federal programs that because of their limited English cannot fully and equally participate in or benefit from those programs or activities. On December 19, 2003, the U. S. Department of Housing and Urban Development (HUD) published guidance designed to assist housing authorities to comply with Title VI of the Civil Rights Act of 1964 and implementing regulations. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal assistance. On January 22, 2007, HUD published final guidance to federal financial assistance recipients regarding the Title VI prohibition against national origin discrimination affecting limited English proficient persons.

While most people in the United States speak, write and understand English, there is a growing population where English is not their primary language. Those individuals having a limited ability to read speak or understand English are considered to be limited English proficient (LEP). Language limitations can be a barrier to accessing important benefits or services including understanding information relevant to the Public Housing Programs.

The WHA, as a recipient of federal assistance, is required to take reasonable steps to ensure access to the housing program, and has an obligation to reduce language barriers that preclude meaningful access by LEP persons to government services and programs. LEP persons are defined as persons who do not speak English as their primary language and who have limited ability to read, write, speak or understand English. All Public Housing Program applicants and participants, or their authorized representative(s), who have a limited proficiency with the English language may benefit from these services.

When a Public Housing Program waiting list is opened, a public notice is published in the local newspaper. Based on the latest census information and current program demographics the public notice may be published in English and Spanish. If the application is not advertised in Spanish or other languages, the English application includes a question regarding LEP and asks the applicant to specify their primary language if other than English. This will alert the housing authority staff to the potential need for interpreters.

In accordance with the HUD regulations, the WHA will balance four factors in determining the level of access needed by LEP persons who speak a particular language:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Public Housing Program;

2. The frequency with which LEP persons contact the program;
3. The nature and importance of the activity or services provided by the program; and
4. The resources available to the WHA and the cost to provide these services.

Balancing these four factors will ensure meaningful access by LEP persons to critical services, while not imposing undue burdens on the WHA.

### Bilingual Staff

The WHA has bilingual staff (most are fluent in Spanish) and the staff has been trained to assist a person in need of language assistance. If the staff is unable to communicate with this person, the office has “I Speak” flash cards so that customers can identify the language they speak. Once identified, the staff will assist the family in a manner to allow them meaningful access to the program.

### Staff Training

Since all field office staff could have contact with program applicants and participants who have limited English proficiency, all staff will receive training. The training will include:

- A discussion of the plan
- How to respond to LEP callers
- How to respond to LEP clients who contact our office in person
- How to use the “I Speak” cards
- The location of translated documents

### Written Translation

All vital documents (as deemed necessary by HUD) shall be translated into Spanish, and WHA will provide oral translation where reasonable for LEP clients. HUD has translated the Model Lease into 8 languages and the other documents into 12 languages. The following is a list of vital documents required by HUD, and HUD will provide translations for these documents:

- Voucher
- Authorization to Release Information
- Model Lease
- How your Rent is Determined

- Request for Tenancy Approval
- Tenancy Addendum
- Statement of Homeownership Obligations
- A Good Place to Live

Please note that in accordance with HUD directives, a translated document is not the official document. The English version of all documents is the official controlling document.

#### Monitoring and Updating the LEP Plan

The WHA will review its LEP Plan annually when it updates its Administrative and Admissions and Continued Occupancy Plans to determine the current effectiveness and any changes in LEP populations or needs. Modifications to the plan will be based on:

- Census data
- The amount of contact the program has with LEP persons
- Whether the current LEP Plan is meeting the needs of our clients
- Whether the program is meeting its goals relevant to the LEP regulations
- A review of sources of assistance to determine if resources are still available and viable

#### Guidelines for Interpreters

All language interpreters and translators will be held to a Code of Professional Conduct which will include but is not limited to:

1. Accuracy. Interpreters/translators shall thoroughly and faithfully render the source language message, omitting or adding nothing, giving consideration to linguistic variations in both source and target languages, conserving the tone and spirit of the source language message.
2. Cultural Sensitivity and Courtesy. Interpreters/translators shall be culturally competent, sensitive, and respectful of the individuals they serve.
3. Confidentiality. Interpreters/translators shall not divulge any information obtained through their assignments, including but not limited to, information gained through access to documents or other written materials.

4. Disclosure. Interpreters/translators shall not publicly discuss, report, or offer an opinion concerning matters in which they are or have been engaged, even when the information is not privileged by law to be confidential.

5. Proficiency. Interpreters/translators shall meet the minimum proficiency requirements set by the WHA and the industry standards.

7. Non-discrimination. Interpreters/translators shall always be neutral, impartial and unbiased. Interpreters/translators shall not discriminate on the basis of gender, disability, race, color, national origin, age, socio-economic or educational status, or religious, political or sexual orientation. If interpreters/translators are unable to ethically perform in a given situation, the interpreters/translators shall refuse or withdraw from the assignment without threat or retaliation.

8. Impartiality - Conflict of Interest. Interpreters/translators shall disclose any real or perceived conflict of interest that would affect their objectivity in the delivery of service. Providing interpreter/translation services for family members or friends is the client's option, however, it is not recommended as it may violate the individual's right to confidentiality and constitutes a conflict of interest.

9. Scope of Practice. Interpreters/translators shall not counsel, refer, give advice, or express personal opinions to individuals for whom they are interpreting/translating or engage in any other activities that may be construed to constitute a service other than interpreting/translating.

10. Reporting Obstacles to Practice. Interpreters/translators shall assess at all times their ability to interpret/translate. Should interpreters/translators have any reservations about their competency, they must immediately notify the parties and offer to withdraw without threat of retaliation. Interpreters/translators may remain until more appropriate interpreters/translators can be secured

11. Ethical Violations. Interpreters/translators shall immediately withdraw from encounters they perceive as violations of this Code.

This Code applies to all persons providing language interpreting or translation services and must be complied with at all times.