Housing Department

*Improving Access to Services for People with Limited English Proficiency (LEP)*

Language Assistance Plan (LAP) 2017

For Limited English Proficiency (LEP) Persons

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Final Guidance


“The Department of Housing and Urban Development (HUD) is publishing the final ‘Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons’ (Guidance) as required by Executive Order (EO) 13166. EO 13166 directs federal agencies that extend assistance, subject to the requirements of Title VI, to publish Guidance to clarify recipients’ obligations to LEP persons. This final Guidance follows publication of the proposed Guidance on December 19, 2003.’” Effective February 21, 2007 (72 FR 2731).

Introduction

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).

This report outlines how the Santa Clara County Housing Authority (SCCHA) provides language assistance to ensure that all persons have access to the agency’s programs and activities.
Definitions

Limited English Proficiency person: Any person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such person or persons shall be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit, or encounter. This is based on the client’s assessment.

Vital document: Any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by federal funds, or that are required by law. Such documents may include, but are not limited to applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services.

Interpretation: The act of listening to spoken words in one language (the source) and orally translating it into another language (the target).

Translation: The transcription of a written text from one language into an equivalent written text in another language. Note: Some LEP persons cannot read in their own language and oral interpretation services may be needed for written documents.

Four-Factor Analysis: Housing authorities are required to take reasonable steps to ensure meaningful access to LEP persons. This standard is intended to be flexible and fact-dependent. It is also intended to balance meaningful access to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations.

HUD Recipient: Federally-assisted agencies receiving HUD funding. In this document, “recipient” refers to SCCHA.

Legal Authority

“This HUD policy is thus published pursuant to Title VI, Title VI regulations, and Executive Order 13166. It is consistent with the final DOJ ‘Guidance to Federal Financial Recipients regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,’” published on June 18, 2002 (67 FR 4145).

Who is Covered?

“Pursuant to Executive Order 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the LEP Guidance are to additionally apply to the programs and activities of federal agencies ... Recipients of HUD assistance include, for example:
Who is a Limited English Proficient Individual?

“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. Examples of populations likely to include LEP persons who are encountered and/or serviced by HUD recipients and should be considered when planning language services, but are not limited to:

Persons who are seeking housing assistance from a public housing agency or assisted housing provider or are current tenants in such housing” (72 FR 2740).

Four-Factor Analysis

HUD provides a four-factor analysis as a framework to identify LEP persons who need language services and to what extent. Data from this analysis enables SCCHA to evaluate which languages require document translation services, in addition to interpretation services, and which languages require only interpretation services, because they fall below the HUD threshold. With this insight, this LAP explains SCCHA’s language assistance measures, staff training and agency monitoring.

Factor 1:

“For most recipients, the target audience is defined in geographic rather than programmic terms. In many cases, even if the overall number or proportion of LEP persons in the local area is low, the actual number of LEP persons served by the program may be high. Recipients of HUD funds are required by existing regulations to outreach, educate, and affirmatively market the availability of housing and housing-related services to eligible persons in the geographic area that are least likely to apply for and/or receive the benefit of the program without such outreach and education activities and/or affirmative marketing” (72 FR 2748).

Factor 2:

“Frequency of contact should be considered in light of the specific program or the geographic area being served. Some education programs or complaint processing may only require a single or limited interaction with each LEP individual served. In contrast, housing, counseling, and housing supportive services programs require ongoing communication. In the former case, the
type and extent of LEP services may be of shorter duration, even for a greater number of LEP persons, than in the latter case. Therefore, decisions must be made accordingly” (72 FR 2748).

**Factor 3:**

“Importance of Service/Information/Program/Activity. Given the critical role housing plays in maintaining quality of life, housing and complementary housing services rank high on the critical/non-critical continuum. However, this does not mean that all services and activities provided by recipients of HUD must be equally accessible in languages other than English. For example, while clearly important to the quality of life in the community, certain recreational programs provided by a HUD-funded recipient may not require the same level of interpretive services as does the recipient’s underlying housing service. Nevertheless, the need for language services with respect to these programs should be considered in applying the four-factor analysis” (FR 72 2748).

**Factor 4:**

“Costs vs. Resources and Benefit. The final factor that must be taken into account is the cost of providing various services balanced against the resources available to the HUD-funded recipient providing the service” (FR 72 2748). Financial considerations include the type of program.

“There are some programs for which translation and interpretations are such an integral part of the funded program that services would be provided in some way to any client that requires them. In important programs or activities (e.g., tenant selection and assignment ... fair housing complaint intake, conflict resolution between tenants and landlords, etc.) that require one-on-one contact, oral and written translations would be provided consistent with the four-factor analysis used earlier. Recipients could have competent bi-or multilingual employees, community translators, or interpreters to communicate with LEP persons in languages prevalent in the community. In some instances, a recipient may have to contract or negotiate with other agencies for language services for LEP persons” (FR 72 2748).

**LAP Elements**

(Indicated by ▲)

▲ **Identifying LEP Individuals Who Need Language Assistance**

*Santa Clara County is one of the most ethnically and linguistically diverse counties in the United States. According to the 2009-2013 American Community Survey Five-Year Estimates by the U.S. Census Bureau, 50.3% of residents between 18 and 64 years of age in Santa Clara County speak a language other than English at home. HACSC serves low-income county residents with limited English proficiencies that require a translator to utilize the agency’s services.*
The Department of Housing and Urban Development (HUD) mandates the written translation of all required forms for certain linguistic groups of clients, based on their demographic representation in the area being served. The criteria determining the need for translated vital documents is as follows:

<table>
<thead>
<tr>
<th>Size of language group</th>
<th>Recommended provision of written language assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,000 or more in the eligible population in the market area or among current beneficiaries</td>
<td>Translated vital documents</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and more than 50 in number</td>
<td>Translated vital documents</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and 50 or less in number</td>
<td>Translated written notice of right to receive free oral interpretation of documents.</td>
</tr>
<tr>
<td>5% or less of the eligible population or beneficiaries and less than 1,000 in number</td>
<td>No written translation is required.</td>
</tr>
</tbody>
</table>

Source: Federal Register, January 22, 2007 (2753)

SCCHA ANALYSIS:
The chart below reflects data from the 2010 Census for Santa Clara County:

<table>
<thead>
<tr>
<th>Ethnicities with non-English languages and number in Santa Clara County</th>
<th>Percentage of County population when more than one percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chinese</td>
<td>8.6%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>7.0%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>26.8%</td>
</tr>
<tr>
<td>Filipino</td>
<td>4.9%</td>
</tr>
<tr>
<td>Asian Indian</td>
<td>7.0%</td>
</tr>
<tr>
<td>Japanese</td>
<td>1.5%</td>
</tr>
<tr>
<td>Korean</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

Source: 2010 U.S. Census Bureau, DP05, ACS Demographic and Housing Estimates

Of these language groups, the following chart indicates the percentages who speak their native language at home, as well as the percentage whose income is below the poverty level by the U.S. Census standards. Note that the U.S. Census combines all Asian and Pacific Islanders into one group. Poverty level, as defined by the census, is primarily below SCCHA’s income eligibility definition of “extremely low” (30% of average median income). These are the only two language minorities listed in the U.S. Census, S1702, Poverty Status in the Past 12 Months of Families.

<table>
<thead>
<tr>
<th>Ethnicity (18 to 64 years old)</th>
<th>Speaks English less than very well</th>
<th>Percentage below U.S. Census poverty level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>50.3%</td>
<td>15.4%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>47.2%</td>
<td>15.5%</td>
</tr>
</tbody>
</table>

Source: 2009-2013 U.S. Census Bureau, S1601, Languages Spoken At Home and S1702 Poverty Status in the Past 12 Months
If SCCHA considers the service area of Santa Clara County and the potential clients with qualifying low incomes, it is clear from the chart above that translation services are needed for all Spanish and Vietnamese language client vital documents. In SCCHA’s Elite database, program participants are tracked by their language proficiencies. In a SCCHA report generated from the database on June 18, 2015, 3,808 participants reported Vietnamese as their primary language instead of English and 530 reported Spanish as their primary language. Therefore, vital Vietnamese language client documents must also be translated. Although current numbers of participants who speak Spanish as their primary language do not trigger written translations of vital documents, SCCHA management has requested that all vital client documents be translated into Spanish because the last four-factor analysis completed for the Agency (in 2005) indicated that the number of Spanish-speaking program participants was high enough to require vital document translation and the Agency wants to continue to provide this service.

Other language preferences captured in the database include Mandarin (208), Russian (179), Farsi (62), and Korean (72). Mandarin, Russian, Farsi and Korean speakers each make up less than 5% of HACSC’s total number of participants and are each less than 1,000 in number. Therefore, these languages would not require vital document translations at this time. LEP individuals would receive telephone or in-person interpretation services for these languages for all vital written Agency documents, as well as for conversational communications between Agency staff and participants.

<table>
<thead>
<tr>
<th>Language preferences &gt; (Elite 6-18-15) but less than 5% of eligible population</th>
<th>Participant Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>No written translation is required, phone/in-person interpretation available</td>
<td></td>
</tr>
<tr>
<td>Cambodian</td>
<td>75</td>
</tr>
<tr>
<td>Cantonese</td>
<td>69</td>
</tr>
<tr>
<td>Farsi</td>
<td>62</td>
</tr>
<tr>
<td>Korean</td>
<td>72</td>
</tr>
<tr>
<td>Mandarin</td>
<td>208</td>
</tr>
<tr>
<td>Russian</td>
<td>179</td>
</tr>
<tr>
<td>Languages requiring translated vital documents</td>
<td></td>
</tr>
<tr>
<td>Spanish</td>
<td>530</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>3,808</td>
</tr>
<tr>
<td><strong>Total SCCHA participants tracked</strong></td>
<td><strong>15,835</strong></td>
</tr>
</tbody>
</table>

Source: HACSC Elite database, retrieved 6-18-2015

Based on this data, SCCHA is required to have vital document translations for Spanish (1,000 or more of the eligible population) and Vietnamese. Even though six of the language preferences
in the database have a count above 50, they do not meet the 5% threshold. Therefore, SCCHA is only required to continue to provide vital document translations for Spanish and Vietnamese.

By comparison, language preference demographics for CalWORKs is outlined below. The primary languages spoken reflect the 2010 Census with English, Spanish and Vietnamese representing the largest language groups. CalWORKs demographics also mirror the translation requests at HACSC. One notable difference is that CalWORKs lists the Spanish language group as much greater than the Vietnamese language group. HACSC has significantly more requests for Vietnamese translations and interpretations than for Spanish. Regardless of this order, both languages require translated vital documents for HACSC participants and applicants.

<table>
<thead>
<tr>
<th>CalWORKS demographics countywide by language as of October 1, 2015</th>
<th>Participant Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>14,524</td>
</tr>
<tr>
<td>Spanish</td>
<td>5,338</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>642</td>
</tr>
<tr>
<td>Farsi</td>
<td>105</td>
</tr>
<tr>
<td>Arabic</td>
<td>81</td>
</tr>
<tr>
<td>Other languages</td>
<td>333</td>
</tr>
<tr>
<td><strong>Total participants tracked</strong></td>
<td><strong>21,023</strong></td>
</tr>
</tbody>
</table>

Source: www.sccgov.org

**SCCHA ANALYSIS:**

*The Frequency with Which LEP Individuals Come in Contact With the Program*

One way to determine frequency of contact is to look at the number of interpretation/translation services that have been provided. In April 2015, the contracted language services company provided phone interpretation services on 46 separate occasions. The majority of these interpretation requests (36) were in Vietnamese and four were in Spanish. These interpretations were conducted as three-way phone communications between the LEP client, an SCCHA employee and the interpreter. Staff interpreters are often utilized for walk-in applicants and participants. In July of 2015, SCCHA staff provided interpretation services to clients on 14 separate occasions. Tenant training and outreach programs are conducted in Spanish and Vietnamese, which are determined by language preferences indicated on RSVPs from tenants.
Nature and Importance of Program or Service

Rental housing costs in Santa Clara County are among the highest in the nation. The average four-year rent increase per unit in Santa Clara County is 44.6% according to RealAnswers, an online housing data collection resource. In order to apply for or participate in subsidized housing programs offered by SCCHA, LEP persons must fill out multiple forms, understand and abide by numerous procedures and find scarce affordable housing.

▲ Language Assistance Measures
At this time, SCCHA is able to provide document translation services for all languages that meet HUD quantitative guidelines. Interpretation will be available, as needed for LEP persons, through designated staff and a contracted language services provider.

Type of Program: “There are some programs for which translation and interpretation are an integral part of the funded program such that services should be provided in some way to any client that requires them. In important programs or activities (i.e., tenant selection and assignment, homeownership counseling, fair housing complaint intake, conflict resolution between tenant and landlords, etc.) that require one-on-one contact with clients, written translation and verbal interpretation services should be provided consistent with the four-factor analysis used earlier. Recipients could have competent bi- or multilingual employees or community translators, or interpreters to communicate with LEP persons in languages prevalent in the community. In some instances, a recipient may have to contract or negotiate with other agencies for language services for LEP persons” (FR 72 2748).

▲ Summarization of SCCHA’s LAP Process

Written Translations
1. SCCHA will provide translations of its vital documents into Spanish and Vietnamese.
2. SCCHA will obtain translations of documents submitted by a client for any language other than English.

Oral Interpretation Services
1. All non-English speaking participants and applicants are entitled to and will be offered oral interpretation either by the in-house translator of the day or by phone through the contracted agency.

▲ Training Staff
SCCHA staff training will include the following:

1. SCCHA’s LEP policies.
2. Proper noticing requirements for LEP persons, including posting of signs in common areas, translations of outreach documents and stating that interpretations are available by phone.
3. The types of language services available:
   a. In-house interpreters/translations
   b. Written translations of documents
   c. Interpretation by telephone
   d. Vendor-provided on-site interpretation for spoken and American Sign Language (ASL)

4. How to obtain in-house interpretation/translation services.
5. How to access language interpretation services by phone and translation of documents by email from contracted interpretation/translation service providers.
6. How to respond to LEP callers.
7. How to use the HUD Language-Identification “I Speak” cards.
8. How to respond to written communication from LEP persons.
9. How to work with LEP clients in person and with phone interpreters.
10. How to document the use of translations/interpretations.

SCCHA will distribute the LAP and provide training to staff annually on how to assist a person with limited English proficiency. Additionally, the LEP plan will be part of the new staff orientation binder.

**Interpretation Process**

SCCHA’s protocol for accessing language services is as follows:

1. The Agency will utilize certified bilingual staff to assist persons with limited English proficiency.
2. When walk-in clients cannot communicate their language preference, staff will use the “I Speak” language identification flashcards (Exhibit 4) developed by the U.S. Census Bureau. With the language identified, staff will either utilize an in-house interpreter or call its contracted interpretation agency to request an interpreter in the designated language (Exhibit 2).
3. When extensive interpretation is required for appointments, SCCHA advises applicants and participants to request the free language interpretation service at least three days in advance of the meeting. This would allow time to schedule in-house interpreters to meet with the client during their scheduled appointment.
4. When bilingual employees are not available to assist with language needs, staff may access the contracted language interpretation agency to provide phone interpretation for clients.
5. If the oral interpretation is for an informal hearing, the caller must inform the contracted agency that the interpretation will be for an informal hearing.
6. The participant or applicant may choose to refuse SCCHA-provided interpretation and provide their own interpreter, with the exception of an informal hearing. An agency-provided interpreter must be provided for informal hearings.

7. Staff must never require, suggest, or encourage a person with limited English proficiency to use family members or friends as interpreters. At no time will persons under the age of 18 (if their age is known) be utilized to provide interpretive services.

8. Staff must note in Elite notes any time they offered and provided a participant or applicant interpretation services.

9. If a person has refused interpretation services, SCCHA employees need to note in Elite that the participant/applicant was offered interpretation services and note that they refused the service or provided their own interpreter, if this occurs.

**Translation Process**

The Housing Authority will translate vital written documents into the language of each qualifying LEP group eligible to be served and/or likely to be affected by the program. Vital documents are written materials that contain awareness of rights or services to the programs that are translated to assist a person with LEP.

1. If an employee believes that a SCCHA letter or form needs to be translated, they must request a translation from their immediate supervisor.

2. The supervisor will forward the document to Policy Unit, who will determine if the document is vital, thus requiring translation into Spanish and Vietnamese. The designated Policy employee would order the translation from its contracted translator. The translated documents shall be ordered to be translated using the same format as the English version.

3. Once the translated document has been reviewed and approved internally by the designated staff for Spanish and Vietnamese translations, the designated Policy employee will upload the final translated form to F:\forms & labels\In-House, then stored in either “Spanish forms & letters,” or “Vietnamese forms & letters” or uploaded as a multi-lingual letter into Elite. An all-staff email will then be sent out notifying staff of the uploaded translated documents.

4. If a household has identified that their language preference is Spanish or Vietnamese and a Spanish/Vietnamese version of a letter or form is available, the family must be sent both the English and alternative language version of the letter/form and both versions must be included in the file for scanning to demonstrate that the family received both versions. For documents requiring signature, it is preferable to have both English and alternative language form signed; however, it will not be an audit finding if only the English form is signed.
5. If a client writes a letter or sends a document to the Housing Authority in a language other than English, the employee who receives the letter will attempt to use in-house translators to provide an English translation of the letter, if possible. If SCCHA does not have a translator in the written language, the employee will forward the letter to the designated staff member, who will submit the document to the agency’s contracted translator for translation.

▲ Providing Notice to LEP Persons
SCCHA will take the following steps to educate the LEP group about the free language services:

1. Use of the “I Speak” language identification flashcards, when necessary.
2. Notify applicants and participants of the availability of free language services on the website.
3. Include notice of free language services in public notices published in area newspapers in Spanish and Vietnamese.
4. Posting signs outlining translation/interpretation services in lobby area.
5. If a client feels that they have been denied proper language interpretation/translations, they may request these services from their Housing Specialist. If they are not satisfied with the solution offered by the Housing Specialist, they may contact the assigned Supervisor. If the Supervisor does not provide satisfactory results, they may contact the assigned Manager. The assigned Assistant Director may be contacted if all of the previously mentioned staff members have not resolved this issue with the LEP person.

▲ Monitoring and Updating the LAP
SCCHA will conduct a needs assessment every three years to determine whether changes to the LAP are required. The following methodology will be utilized to measure the needs of people with limited English proficiency.

1. Review and evaluate the translation invoices from the contracted language service contractor to determine if interpretation and translation requests are made for languages other than the Vietnamese and Spanish, numbering more than 5% of the eligible population (800) and more than 50 in number. If this occurs, the languages meeting these criteria would require translated vital documents.
2. Staff interpreters will keep track of categorized language interpretations requested.
3. Incorporate “language spoken” on the waiting list form, personal declaration and continued eligibility forms to identify the language preferences of LEP groups.
4. Obtain and review an annual report of requested translated and interpreted languages from the designated language services contractor.
5. Have SCCHA’s internal translators review all vital forms in their assigned language for accuracy and to ensure that the latest version is currently in use. These documents will be updated with review approval dates in the document footers.

6. Maintain digital folders, organized by language, for all vital documents in a shared drive.

7. Check with Managers and Supervisors biannually to receive recommendations for additional forms that require translation. (See Exhibit 3 for a list of current and planned translated documents.)
Exhibit 1: Obtaining an Interpreter or Translations

Check the rotation schedule for in-house interpreters and translators.

How to call interpreters at Worldwide Interpreters

Instructions for Obtaining Interpretation and Translation Services

The Santa Clara County Housing Authority has entered into a contract with Worldwide Interpreters, Inc., who will handle all of our telephonic and on-site interpretations for persons speaking languages other than English and written translations of documents into our current Limited English Proficiency languages (Spanish and Vietnamese). Effective immediately, Staff will no longer use Certified Languages International or Purple, Inc. to request interpretation/translation services. Please follow these instructions for obtaining A. Telephonic Interpretation Services; B. Written Translations; or C. On-Site Interpretation Services.

A. Telephonic Interpretations

1. To reach an interpreter, dial 1-888-291-8048. You will be prompted to enter a PIN (password) followed by the # key.
   a. Enter PIN 71342# if the translation is for a client under the regular voucher program (includes Enhanced and PBV programs);
   b. Enter PIN 15937# if the translation is for a client under one of the following Special Programs: Mod Rehab, CoC, Mainstream, VASH, FUP and NED.

2. At the end of the initial greeting, press 1 or say “Spanish” for a Spanish interpreter, or press 2 or say “Operator” for any other language.

3. For more instructions on how to work with an interpreter over the telephone, see the attached one-page “Guide to Effectively Working with our Interpreters”.

B. Written Translations†

1. Email the documents you need translated to translations@e-WWI.com. Advise what languages you want the documents translated.

2. You will receive a quote which you must approve before they will proceed. HACSC will be invoiced for each translation job after we have received the completed translation.

† A $75 per-language minimum applies to all translations.
C. On-Site Interpretation Services*

1. Send on-site interpretation requests for spoken and American Sign Language (ASL) to info@interprenet.net.

2. On the subject line of the email, please include the date, time and language of the request.

3. When requesting an onsite interpreter please provide the following information in the body of the email:
   
   a. Time and Date when Onsite Interpreter is needed
   b. Approximate Duration of Assignment
   c. Onsite contact (who should the interpreter ask for from HACSC upon arrival)
   d. Exact Location where interpreter is needed (organization name, street address, city, state and zip code)
   e. Reference Name or Case # (provide last name of client and entity ID)**
   f. Language Required

4. Interprenet will acknowledge your request within 2 hours and will send you a confirmation of your order within 24 hours or notify you about the status of your request.

5. If you are having trouble getting a response within the indicated timelines, email Ms. Eliza Jackson, who oversees the Scheduling Department. Her email is eliza@interprenet.net.

* All languages except Spanish (including ASL) are $90 per hour with a 2-hour minimum.

** This information is necessary for billing purposes.

Interpreters are available for Informal Hearings

1. For Limited English Proficiency (LEP) persons, interpretation will be available during informal hearings at HACSC.
   
   a. The Housing Specialist assigned to the participant or applicant is responsible for determining that interpretation is required based on the language preference indicated in Elite, or the written or verbal request from the client.
   
   b. SCCHA must provide a certified interpreter even though the participant or applicant wishes to bring someone, over 18 years old, to interpret for them.
   
   c. The Housing Specialist will schedule the interpreter to attend the hearing.
d. The determination letter written by the Hearing Officer will be translated into the appropriate language and provided to the participant or applicant.

**Exhibit 2: Translated Documents**

**Vital Documents**

The following list of documents is currently available to LEP participants in Vietnamese.

1. 70100: Things You Should Know
2. 10510 Immigrant Status
3. Consent Form for Release of Sex Offender Registry and Criminal Background
4. Continued Eligibility Criminal and Sex Offender Status
5. 10780 Family Obligations
6. 52675 Debts Owed
7. Rent Calculation Letter
8. Rent Portion Letter – Multi-Lingual
9. Special Rent Portion – Letter
10. Special Rent Portion – Rent Reduction Multilingual
11. Reasonable Accommodations Form
12. HUD 9886, Contact Information
13. HUD 50066, Certification of Domestic Violence
14. Receipt of Voucher and Notice of Investigation
15. Waiting List Update

The following list of documents is currently available to LEP participants in Spanish.

1. 70100: Things You Should Know
2. 10510 Immigrant Status
3. Consent Form for Release of Sex Offender Registry and Criminal Background
4. Continued Eligibility Criminal and Sex Offender Status
5. 10780 Family Obligations
6. 52675 Debts Owed
7. Rent Calculation Letter
8. Rent Portion Letter – Multi-Lingual
9. Special Rent Portion – Letter
10. Special Rent Portion – Rent Reduction Multilingual
11. Reasonable Accommodations Form
12. HUD 9886, Contact Information
13. HUD 50066, Certification of Domestic Violence
14. Receipt of Voucher and Notice of Investigation
15. Waiting List Update
16. Zero Income
List of Non-Vital Documents

In accordance with factor 3 of the four-factor analysis, non-vital documents shall be translated when they affect “the recipient’s underlying housing service.” The following translated documents fall into this category.

2. Extended Voucher Housing Search Action Plan 2-19-15_VI
3. Housing Search Guide Brochure ES
4. Housing Search Guide Brochure VI
5. Housing Voucher Search Form Spanish 11-4-14_ES
6. Housing Voucher Search Form 11-4-14_VI

List of Documents Scheduled for Translation and Outreach Efforts

1. All Elite letters/forms that are not currently translated will be translated within one year of the Language Access Plan publication date. Following that, when the Elite letters are updated in English, they will also be translated into Spanish and Vietnamese within 30 days after the English version is finalized.
2. Whenever the waiting list is open, applications, Frequently Asked Questions (FAQs), and instructions on how to apply will be available on the website in the Language Access Plan (LAP) designated languages.
3. Advertising will be available in the Spanish and Vietnamese newspapers and/or radio stations regarding the following occurrences:
   a. The opening of the waiting list
   b. Public hearings for the Moving to Work annual plans and reports
   c. Tenant outreach events such as a Tenant Resource Fair
4. The website will include a section on the Language Access Plan which will include a translated description of provided languages services along with a translated complaint form (see Exhibit 5) for reporting any deficient language services for Limited English Proficiency (LEP) persons who were underserved at the agency or agency event.
5. SCCHA’s main phone line provides messages in English, Spanish and Vietnamese. If other languages become LAP designated languages, this phone message will be updated accordingly.
### Exhibit 3: ‘I Speak’ Cards

<table>
<thead>
<tr>
<th>Language Code</th>
<th>Language</th>
<th>Flashcard Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arabic</td>
<td>1</td>
<td>Arabic text</td>
</tr>
<tr>
<td>Armenian</td>
<td>2</td>
<td>Armenian text</td>
</tr>
<tr>
<td>Bengali</td>
<td>3</td>
<td>Bengali text</td>
</tr>
<tr>
<td>Cambodian</td>
<td>4</td>
<td>Cambodian text</td>
</tr>
<tr>
<td>Chamorro</td>
<td>5</td>
<td>Chamorro text</td>
</tr>
<tr>
<td>Simplified Chinese</td>
<td>6</td>
<td>Simplified Chinese text</td>
</tr>
<tr>
<td>Traditional Chinese</td>
<td>7</td>
<td>Traditional Chinese text</td>
</tr>
<tr>
<td>Croatian</td>
<td>8</td>
<td>Croatian text</td>
</tr>
<tr>
<td>Czech</td>
<td>9</td>
<td>Czech text</td>
</tr>
<tr>
<td>Dutch</td>
<td>10</td>
<td>Dutch text</td>
</tr>
<tr>
<td>English</td>
<td>11</td>
<td>English text</td>
</tr>
<tr>
<td>Farsi</td>
<td>12</td>
<td>Farsi text</td>
</tr>
</tbody>
</table>
☐ Cocher ici si vous lisez ou parlez le français. 13. French
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. 14. German
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζете ή μιλάτε Ελληνικά. 15. Greek
☐ Make kaze sa a si ou li soswa ou pale kreyòl ayisyen. 16. Haitian Creole
☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएं। 17. Hindi
☐ Kos lub voj no yog koj paub twa thiab hais lus Hmoob. 18. Hmong
☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet. 19. Hungarian
☐ Markaa'm daytoy nga kahon no makabasa wemno makasaoka iti Ilocano. 20. Ilocano
☐ Marchi questa casella se legge o parla italiano. 21. Italian
☐ 日本語を読んで、話せる場合はここに印を付けてください。 22. Japanese
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. 23. Korean
☐ ພູທາຍໃສ່ທ້າຍ ສ່ວນການເລືອກຄວາມ. 24. Laotian
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. 25. Polish