

Housing Authority of the City of San Buenaventura Language Assistance Plan (LAP)

It is the policy of the Housing Authority of the City of San Buenaventura (HACSB) to take reasonable steps to ensure that Limited English Proficient (LEP) Persons have meaningful access to HACSB's direct services. This plan is in accordance with the HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, dated January 22, 2007.

HACSB designates the 504 Coordinator to annually assess the language assistance needs of HACSB and monitor HACSB's delivery of language assistance services in conjunction with HACSB departments that provide direct services to public housing and Housing Choice Voucher (Section 8) applicants, participants, and residents.

ASSESSMENT OF LANGUAGE SERVICES NEEDS – FOUR FACTOR ANALYSIS

Annually, HACSB will review data collected pursuant to the provisions of this Plan and the Four Factor Analysis to assess whether or not Vital Documents should be translated into additional languages. The Four Factor Analysis consists of determining:

1. The number or proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available to HACSB and costs to HACSB.

Guidance provided by HUD states that written translations of vital documents should be provided for each eligible LEP language group that constitutes either 1,000 persons or 5% of the population eligible to be served or likely to be affected or encountered. These groups are referred to as Covered Populations.

Factor No. 1: The Number or Proportion of LEP Persons Served

The number and percentage of LEP persons were determined using the data reported from the 2009-2013 American Community Survey 5-Year Estimates which identifies the number of people that speak a particular language, and whether they speak English very well. The following table summarizes the data:

City of San Buenaventura	Number	Percentage
Eligible population	100,688 ¹	100%
Speak only English	76,207 ²	76.1%
LEP (speak, read, write and understand English "less than well") ³		
Spanish or Spanish Creole	8,749	8.7%
Typical Additional Languages not meeting minimum thresholds		
Tagalog	147	0.2%
Korean	449	0.4%
Arabic	488	0.5%
Vietnamese	129	0.1%
Chinese ⁴	538	0.5%
Hmong	6	0.0%
Thai	42	0.0%

There was only one Covered Population in the City of San Buenaventura, constituting either 1,000 persons or 5% of the population eligible to be served or likely to be affected or encountered: Spanish or Spanish Creole.

Factor No. 2: Frequency of Contact

HACSB has reviewed the need for language assistance in providing services related to federally funded programs. Approximately 13,148 residents speak English "less than very well." This is approximately 13.34% of the City population. The 13,148 residents that speak English "less than very well" represent nearly forty languages. One language, Spanish or Spanish Creole, has a number greater than 1,000 residents who speak English less than "very well."

¹ The ACS 5-Year Estimate was 100,688, with a margin of error of +/- 589 persons. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In an effort to maximize the occurrence of Covered Populations, staff reduced the total population by 589 persons, the lower confidence bound.

² In an effort to maximize the occurrence of Covered Populations, staff increased Language Spoken estimates by the relevant margin of error to the upper confidence bound.

³ The ACS 5-Year Estimate provides data regarding the non-English "Language Spoken at Home" for 39 distinct languages and language groups. The Estimate further provides data regarding the ability of persons that speak non-English languages in the home to speak, read, write and understand English either "very well" or "less than very well." For the purposes of this analysis, data presented correspond only to the category "Speak English less than 'very well.'"

⁴ The ACS 5-Year Estimate combines the languages "Chinese," "Mandarin," and "Cantonese."

By far, the LEP population with the most frequent contact with HACSB is the Spanish-speaking population. In order to provide translation services to these residents, HACSB currently has fifteen (15) Spanish bilingual employees on staff that can effectively communicate with Spanish-speaking LEP persons and translate written documents.

Factor No. 3: Nature and Importance of the Program, Activity, or Service provided HACSB

The City of San Buenaventura's Spanish-speaking population is by far the population with the most frequent contact with HACSB.

The essential functions and programs utilized by LEP families are:

- Marketing materials that explain the availability of federally funded services and programs
- Applications to receive services, benefits or participate in programs or activities
- Annual reviews/income reexaminations
- Public hearings
- Information regarding eligibility or participation criteria
- Notices of free language assistance
- Leases
- Notices of rights, denial, loss, or reduction of benefits or services
- Discrimination complaints
- Informal hearing (HCV) and grievance procedures (PH)

Factor 4: Resources Available to HACSB and Costs to HACSB.

In order to provide translation services to Covered Populations, HACSB currently has fifteen Spanish bilingual employees on staff.

HACSB will utilize HUD-provided and other vital translated documents in Spanish.

HACSB will identify the vital documents used in the programs most likely to involve LEP residents and will focus its efforts to provide language services accordingly. A partial list of vital documents includes:

- Marketing materials that explain the availability of federally funded services and programs
- Applications to receive services, benefits or participate in programs or activities
- Annual reviews/income reexamination notices
- Notices of public hearings
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Leases
- Notices of rights, denial, loss, or reduction of benefits or services
- Discrimination complaints
- Resident grievance procedures

Written translations of additional documents will be provided where available from HUD. Otherwise, oral interpretation will be used to communicate the contents of documents to LEP individuals not speaking Spanish in accordance with the Interpretive Services (Oral Language) policy.

INTERPRETATIVE SERVICES (ORAL LANGUAGE)

Each HACSB department office or location that provides direct services must provide oral interpretation upon request and at no charge to LEP persons at points of contact and service to ensure meaningful access to HACSB's direct services.

HACSB will ensure all employees providing direct services are instructed on how to use language identification cards and how to access oral interpretive services using Language Line Solutions (www.language.com).

HACSB shall notify all applicants, residents and participants of their ability to request an interpreter in notices from HACSB for hearings, interviews, scheduled appointments, and adverse action.

Types of activities for which interpretative services must be offered to LEP persons include, but are not limited to the following:

- Eligibility interview
- Voucher briefing
- Public housing offer and lease signing
- Applicant/resident/participant private conferences and hearings
- Interviews regarding annual and interim reexaminations
- Transfers
- Reasonable accommodation request

HACSB staff is prohibited from requiring LEP persons to bring their own interpreter. If a LEP person *requests* that an adult family member or friend (18 years of age or older) provide interpretation, this practice is acceptable only if it is his/her choice. The employee must advise the LEP person about the availability of free language services and document in writing if the LEP person still chooses to have his/her own interpreter.

TRANSLATION SERVICES (WRITTEN LANGUAGE)

Documents which contain vital information or information that is critical for ensuring meaningful access to HACSB's direct services are considered Vital Documents. The 504 coordinator shall conduct an initial review of its written documents for the purpose of assessing whether any document contains vital information and requires translation. A similar review at time of creation will be conducted to determine if new documents contain vital information and require translation.

HACSB shall translate vital information into Covered Languages before distribution. Covered languages are determined by the Four Factor Analysis which HACSB shall conduct on an annual basis.

Although many documents will be completely translated, HACSB shall use translated summaries to provide the vital information contained in a Vital Document to an LEP person.

Further, some notices contain individualized facts which would be impractical to translate in every instance because of their length and the associated cost and time

involved. In these circumstances, HACSB will advise the notice recipient how to obtain interpretive services and/or provide a translated summary of the document in Covered Languages.

Annually, HACSB will re-assess the data collected and conduct the Four Factor Analysis whether Vital Documents should be translated into other languages, or whether certain languages may be dropped from the requirement.

OUTREACH

HACSB posts notices of the availability of free language assistance services in all offices where LEP persons interact with HACSB. Notices regarding the availability of free language assistance services are also posted on HACSB's website.

TRAINING

HACSB's 504 coordinator will provide ongoing training for appropriate staff about the Limited English Proficiency requirements and HACSB's Language Assistance Plan.

Training will include:

- An overview of HACSB's Language Assistance Plan.
- How and when to use "I Speak" cards to identify the language in which the LEP person needs assistance.
- How and when to access language services through bilingual staff and/or Language Line.
- How to work with an interpreter.
- Prohibition against requiring any LEP person to bring his or her own interpreter.
- Cultural sensitivity

MONITORING AND RECORDKEEPING

HACSB's 504 coordinator will monitor HACSB's provision of language assistance services to LEP persons on an ongoing basis and meet, no less than quarterly, with department language assistance liaisons (LALs) to coordinate and facilitate the delivery of and address issues related to language services.

The 504 coordinator will keep records, including documentation of the Four Factor Analysis, LEP groups, implementation and training, and complaints.

COMPLAINTS

HACSB employees who receive a report, or become aware that a LEP person believes that he/she has not been provided with language assistance services, in accordance with the provisions of HACSB's Language Assistance Plan, should report that information to the San Francisco Regional Office of FHEO, U.S. Department of Housing & Urban Development in one of the following ways:

- By voice telephone at (415) 489-6524 or (800) 347-3739

- By TTY at (415) 436-6594 or (800) 669-9777
- By mail to
San Francisco Regional Office of FHEO
U.S. Department of Housing and Urban Development
600 Harrison Street, 3rd Floor
San Francisco, California 94107-1387
- By email to fheo_webmanager@hud.gov

Notices will advise LEP persons of this opportunity.

FEEDBACK

HACSB will meet with LEP advocates and community organizations semi-annually to discuss HACSB's implementation of its Language Assistance Plan and to receive information on emerging LEP populations.