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# ALBUQUERQUE HOUSING AUTHORITY

## APPENDIX VI LIMITED ENGLISH PROFICIENCY PLAN

### PLAN STATEMENT

Albuquerque Housing Authority (AHA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines the PHA will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for Public Housing and/or Section 8 programs.

### LANGUAGE ASSISTANCE

AHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to AHA programs and activities. AHA will reasonably provide free language assistance to LEP clients in the language preferred. AHA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

### PROVIDING NOTICE TO LEP CLIENTS

AHA shall provide notice to LEP clients of the availability of free language assistance that ensures meaningful access to AHA's programs and services. Notices will be posted in the AHA office at all section receptionist areas where clients are served.

### ORAL INTERPRETATION SERVICES

When interpretation is needed and is reasonable, it shall be provided in a timely manner so as to avoid the effective denial of a benefit or service.

### Formal

When necessary to provide meaningful access for LEP clients, AHA will provide qualified interpreters, including AHA bilingual staff and contract vendors, if available.

AHA shall take reasonable steps to ensure competency of the language service provider. When providing oral language assistance, AHA shall use the following general criteria to ensure effective communication with LEP persons:

- Demonstrate proficiency in and ability to communicate information accurately in both English and in the other language.
- Knowledge in both languages of any specialized terms or concepts particular to AHA's programs or activities.
- Understanding of and following confidentiality and impartiality rules;
- Understanding of and adherence to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles.

### **Informal**

Informal interpreters may include family members, friends, legal guardians, service representatives or advocates of the LEP client. AHA staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. Children will not be used as informal interpreters.

An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by AHA. If an LEP client chooses to use an informal interpreter, AHA reserves the right to also have a formal interpreter present.

### **Telephone Services and On-Site Visitors**

AHA staff will make every effort to determine the language being spoken by the LEP client. "I speak" cards will be available at the front desk. AHA will identify a staff interpreter. If one is not available at the time of the call/visit, the LEP client will be requested to call/return when an interpreter can be available. An informal or formal interpreter will be secured within a reasonable time frame.

### **WRITTEN COMMUNICATIONS**

AHA correspondence will be in the English language. At any time, an LEP client may request the correspondence be orally explained to them in the preferred language.

Correspondence received in languages other than English will be translated by AHA staff who speak the language or by AHA's contracted translation vendor.

### **Translation of Documents**

AHA will weigh the cost and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information and the likelihood of frequent changes in documents.

AHA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group as determined in the four factor analysis. If AHA determines that translation is necessary and appropriate, AHA will arrange to translate such documents/correspondence.

## **LEP PLAN DISTRIBUTION AND STAFF COMPLIANCE**

AHA will ensure that staff knows the obligation to provide meaningful access to information and services to LEP clients. AHA will ensure that:

- LEP policy is provided to all staff and available at the front desk;
- Staff is competent on LEP policies and procedures; and
- Staff having contact with the public is trained to work effectively with interpreters.

## **MONITORING**

AHA will review and revise this LEP Plan as necessary. The review will include:

- Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.
- Periodic assessment and update the four factor analysis, including but not limited to:
  1. The number or proportion of LEP persons eligible to be served or likely to be encountered by AHA.
  2. The frequency with which LEP persons using a particular language come into contact with AHA.
  3. The nature and importance of AHA program, activity or service to the persons' life.
  4. The AHA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed Substantially exceed the benefits.