



Limited English Proficiency (LEP) PRACTICAL IMPLEMENTATION

What is it?

What does it mean to you?

From A PHAs Prospective



Determining LEP Needs

- Census figures show that many people reported that they spoke English “not well” or “not at all”
- 26% of all Spanish speakers
- 29.9 % of all Chinese speakers
- 28.2 % of all Vietnamese speakers



LEP Requirements Published

- Executive Order 13166
- Policy Guidance Notice dated Dec 19, 2003
- Web links
- www.lep.gov
- www.hud.gov/offices/ftheo/promotingfh/lep.cfm



Why should you prepare?

- PHAS are included under this notice and FHEP reviews have begun.
- PHAS must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons
- HUD may come to your agency for other reviews and decide to check your compliance with LEP



Purpose of LEP

To ensure that limited English proficient persons have meaningful access to important federal and federally-assisted programs.



What to do first?

- Complete the HUD Language Assistance Planning and Self-Assessment Tool
 - www.lep.gov
- This will clearly show you what steps you need to implement!!!



PHA Obligations (LEP)

- PHAs must conduct an assessment on:
 - 1. Number or percent of LEP persons eligible to be served or likely to be encountered
 - 2. Frequency with which LEP persons come into contact with the program



PHA Obligations

- 3. Nature and importance of the program, activity or service provided by the program to people's lives
- 4. Resources available to the PHA and associated costs



PHA Obligations

- PHAs should apply the 4 factors to the various kinds of contacts they have with the public to assess language needs
- Then decide what reasonable steps to take to ensure meaningful access for LEP persons



Determining LEP Group

- Number or Proportion:
 - From particular group
 - Eligible to be served or encountered
 - Frequency of contact (greater the frequency the greater the need for enhanced language services)
- Think of the consequences of failure to communicate effectively



Getting Community Input

- Invite community partners who provide services to low-income persons that are LEP to a planning meeting to assist your agency in developing a plan that can work within your community and gain their input in meeting your goals.



Training Community Partners

- Use this planning meeting to provide training to community partners regarding how Housing Programs work; how to apply for housing; what preferences are; income-limits; etc.



Provide Your Partners with Training

- Remember, these are partners that may be the first point of contact with LEP persons and can answer initial questions.



What Next??

- Contact your University or Other Resources to identify your LEP population as they may have the most current stats vs. census data.
- Identify skilled staff that can participate as a planning team and assist in translating documents.



Provision of Language Services

- Two main ways to provide language services:
 - Oral Interpretation
 - In Person
 - Via Telephone
 - Written Translation
 - Quality and accuracy of the language service is critical



Oral Interpretation (LEP)

- Oral Interpretation can range from On-site interpreters for critical services (bi-lingual staff. Staff interpreters; contract interpreters)

Access through commercially available telephone interpretation services

Formal agreements with community volunteers



Written Translation (LEP)

- Written translation can range from

Translating an entire document

Translating a short description of the document



HUD Safe Harbors (LEP)

- Written vital document translation provided for LEP language groups constituting either:
 - 5% of population eligible to be served
 - 1,000 persons of the population whichever is less



Next Steps

- Translate forms identified as vital documents, you should list these in your LEP Plan.

“You may want to contract with a professional translator to edit and certify documents after staff translates to ensure proper translations.”



Samples of What You May Consider as “Vital” Documents

- Applications for Admissions
- Personal Declaration Form
- Zero Income Certification Form
- Lease
- Continued Occupancy Forms
- Fraud Notice
- Verification Forms (including HUD 9886 Form)



Samples of vital documents for LEP

- Reasonable Accommodation Request Forms
- Voucher
- FSS Contract and Outreach
- Repayment Agreements
- Grievance Policy
- Fair Housing and LEP Posters in Lobby



Tagging Documents

- Use tags on all other correspondence, notices, and brochures that will advise the recipients that if they cannot read the English document to contact your agency. (Of course this should be written in the appropriate language of the identified LEP persons in your community).



The Next Steps

- Identify staff that have the skills to translate and interpret for clients and establish a bilingual staff list. Ensure all employees receive a copy of this list and know the procedure for contacting and/or scheduling contracted interpreters.
- Ensure there is a written procedure on “How to handle LEP contacts via telephone, in person or written correspondence.”



Marketing Your LEP Plan

- Develop an Affirmative Fair Marketing Plan which should include how you will implement your LEP Plan.
- Develop flyers, brochures and other marketing material that will advise clients that your agency has an LEP Plan and that these services are free. Distribute through our community!!



More Marketing Tools

- Schedule staff who are bi-lingual to speak at community events that are targeted for LEP persons.
- Advertise in all minority newspapers and appear on local TV and radio shows!!



Public Notices

- Ensure posters or other signs are in all public lobbies and other offices where the public is served advising the public that your agency provides translation and/or interpretation for eligible LEP persons.
- Use the Language Identification Flash Cards available at www.lep.gov – see attached sample
- When you advertise to either open or close wait lists, always include an LEP statement.



Public Notices

- Ensure your main telephone lines have information in both English and you identified LEP populations language.
- If you have a website, ensure information on the website is available in your LEP language. Or at minimal, the vital information, for example how to apply for housing.



Monitoring Your LEP Plan

- Develop staff training to ensure all current and new employees understand this policy. Make this a part of new employee orientation.
- Develop monitoring systems to track your goals as outlined in your plan. Example, track the number and frequency of contacts using logs or through an automatic phone system for callers.



Is Your Plan Working???

- Assess the number of residents/participants or applicants who are within your LEP population compared to those numbers the following year.
- Assign a person/department to update annually.
- Maintain your updates and outcomes for possible HUD Reviews!!!



Sample Outline for LEP Plan

- Introduction- What is LEP and who are your LEP populations. Include a statement of commitment to ensuring the accessibility of your programs and services to all eligible clients including LEP Persons.
 - A. Vital Documents
 - B. Oral Language Service
 - C. Outreach
 - D. Staff Training
 - E. Monitoring Your Plan
 - E. Postings

