

Language Assistance Plan

For Addressing Limited English Proficiency in HUD Assisted Programs

NORTH COUNTRY HOME CONSORTIUM

April 1, 2015

Language Assistance Plan

For Addressing Limited English Proficiency in HUD Assisted Programs

I. INTRODUCTION

The North Country HOME Consortium (NCHC) is committed to ensuring equal access to its programs and services by all residents, regardless of primary language spoken. Title VI and Executive Order 13166 require recipients of federal financial assistance to take reasonable steps to ensure meaningful access to their programs and services by Limited English Proficiency (LEP) persons. Persons who do not speak English as their primary language and who have ability to read, write, speak or understand English can be considered LEP persons.

On January 22, 2007, the U.S. Department of Housing and Urban Development (HUD) issued Final Guidance to the recipients of HUD funding concerning compliance with the Title VI prohibition against national origin discrimination affecting LEP persons. HUD's Final Guidance defines a four-factor analysis method, which assists agencies receiving HUD funds in determining the extent of their obligations to provide LEP services.

Using the LEP self-assessment as a guide, the NCHC prepared this Language Assistance Plan (LAP), which defines the actions NCHC takes to ensure Title VI compliance with respect to LEP persons. The LAP will be periodically reviewed and updated in order to ensure continued responsiveness to community needs and compliance with Title VI.

II. POLICY

No person will be denied access to the NCHC affordable housing programs or program information because he/she does not speak English or speaks limited English. The NCHC will provide language assistance services as needed for clients with LEP to provide meaningful access to programs and services and ensure effective communication between clients with LEP and NCHC funding providers. Clients will be provided with language assistance services at no cost to them and in a timely manner during business hours.

III. GOALS OF THE LANGUAGE ASSISTANCE PLAN

The goals of the NCHC's Language Assistance Plan include:

- To ensure meaningful access to NCHC programs by all eligible individuals regardless of primary language spoken.
- To ensure all LEP individuals are made aware that the NCHC will provide free oral interpretation services to facilitate their contacts with and participation in NCHC programs.
- To provide written translations of vital documents to LEP individuals in accordance with HUD's "safe harbor guidelines".
- To ensure that NCHC housing providers are aware of available language assistance services and how these services need to be used when serving LEP individuals.
- To provide for periodic review and updating language assistance plans and services in accordance with community needs.

IV. LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

The NCHC is made up of 106 municipalities across three counties. According to the 2013 American Community Survey estimates, approximately 0.8% (1,580) of residents over the age of 18 report speaking English “less than very well”. The most frequently spoken non-English languages in the NCHC service area include Spanish, Asian and Pacific Island languages as well as other Indo-European languages.

A survey of all housing providers in the NCHC found that only two providers of the ten have ever assisted customers with limited English proficiency. While the Census data showed there to be enough LEP persons to complete a plan, most of those that are non-English speaking are most likely employed by either Fort Drum or one of the colleges or universities in the area and therefore likely do not qualify for housing assistance due to higher incomes.

V. LANGUAGE ASSISTANCE MEASURES

Although the NCHC serves a very small number of limited English speaking individuals, the NCHC is committed to removing as many barriers to information access as feasible. The following steps have been identified to reduce language barriers to limited English speaking individuals served by or in the NCHC service area.

- Formally document any instances of limited English speaking individuals, requests or inquiries by each agency using NCHC funds. This information will be used as a data source to identify potential future language needs.
- Post information prior to public meetings noting that language translation services can be made available if requested ahead of time.
- On the webpage of the NCHC portion of the Jefferson County Planning website, include a note that interpreters and documentation translation can be requested.
- Identify a resource list of interpreters and translation services.
- Collaborate with local agencies and institutions who are able to provide interpretation and translation services.
- Whenever information is made available in multiple languages, have the translations on file and on display if possible in the appropriate agencies.
- Post the LAP on the NCHC and other housing provider’s websites.
- Review the LAP yearly or as needed. Updates should include interviews with NCHC housing providers focusing on new LEP encounters or requests for assistance, review of changes in resource lists, and review of changes in available resources.

VI. IMPLEMENTATION

In order to implement this plan, staff of the NCHC and its housing providers will be made aware of resources and trained in how to access them.

HUD ‘Fair Housing Notices’ and other notices will be available in the offices or will be printed on an as needed basis. “I speak” cards will be readily available. Staff will be provided with information on where translated resources are available to download from the HUD website.

Available resources:

- HUD documents printed in English and other languages: <http://www.hud.gov/offices/fheo/lep.xml>
- Language ID cards (I speak cards): <http://www.lep.gov/ISpeakCards2004.pdf>
- Telephone Services: www.languageline.com

www.ctslanguagelink.com

www.pacificinterpreters.com