

ASHEBORO HOUSING AUTHORITY LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Updated November 2023

Section 1. Plan Statement

The Asheboro 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 the Department of Housing and Urban Development (HUD) the AHA will make reasonable efforts to provide or arrange free language assistance for its LEP clients. This includes applicants, recipients, and/or persons eligible for AHA programs.

Section 2. Meaningful Access: Four-Factor Analysis

Meaningful access is free language assistance in accordance with federal guidelines. The AHA will periodically assess and update the following four-factor analysis, including but not limited to:

- A. The number or proportion of LEP persons eligible to be served or likely to be encountered by the AHA (Attachment A).
- B. The frequency with which the LEP persons using a particular language come into contact with the AHA.
- C. The nature and importance of the AHA program, activity or service to a person's life.
- D. 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.

Section 3. Language Assistance

- A. A Limited English Proficient (LEP) person may be a person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English. An LEP person may be entitled to language assistance with respect to AHA programs and activities.
- B. Language assistance includes interpretation and/or translation. Interpretation refers to an oral or spoken transfer of message from one language into another language. Translation refers to the written transfer of a message from one language into another language. The AHA will determine when interpretation and/or translation are needed and are reasonable based upon family requests and staff observations.

- C. AHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and the AHA determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, the AHA will make reasonable efforts to provide free language assistance. If reasonably possible the AHA will provide the language assistance in the LEP client's preferred language.

The AHA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

The AHA will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients.

- D. Translation of Documents

Taking into consideration the expense of translating documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and the apparent literacy rate in an LEP group along with other relevant factors the AHA will weigh the costs and benefits of translating documents for potential LEP groups.

The AHA will monitor participant's ability to complete all necessary forms without a substantial amount of difficulty. If there has been significant errors and/or blank responses the AHA may determine that translated documents are necessary.

If the AHA determines that translation is necessary and appropriate, the AHA will translate the public housing lease and selected mailings and documents of vital importance into that language.

As opportunities arise, the AHA may work with other housing authorities to share the costs of translating common documents, which may include language groups that do not (yet) reach the threshold level in the AHA's client population.

The AHA will consider technological aids such as internet-based translation services that may provide helpful, although perhaps not authoritative, translations of written materials.

- E. Formal Interpreters

When necessary to provide meaningful access for LEP clients the AHA will provide qualified interpreters. At important stages that require one-on-one contact, written translation and verbal phone interpretation services will be provided consistent with the four-factor analysis used earlier.

Formal interpreters shall be used at the following unless the client requests an informal interpreter or waives his right to interpreter services (Attachment B):

- Formal hearing for denial of admission to public housing
- Informal settlement conferences and formal hearing for termination of Public Housing
- Hearings or conferences concerning denial or termination of Housing Choice Voucher (Section 8) participation.

F. Informal Interpreters

Informal interpreters may include anyone who speaks the language of the client and meets the client's approval. AHA staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest.

An LEP person may use informal interpreters of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the AHA. If possible, the AHA will accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.

If an LEP client prefers an informal interpreter after the AHA has offered free interpreter services, the informal interpreter may interpret. In these cases the client and interpreter should sign a waiver of interpreter services (Attachment B).

If an LEP client wants to use their own informal interpreter the AHA reserves the right to also have formal interpreters present.

G. Outside Resources

Outside resources may include community volunteers, AHA residents or Housing Choice Voucher/Section 8 participants.

Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

The AHA may establish relationships with organizations that assist specific cultural and ethnic groups living in or around Asheboro. To help their clients obtain or keep housing assistance through the AHA these organizations may be able to provide qualified interpreters for LEP persons.

Section 4. Monitoring

The AHA will review and revise this LEP plan if it appears that such revision will, within the scope of reasonableness, improve the ability of AHA to serve target LEP populations. The review will include:

- The number of AHA clients who are LEP according to the extent of AHA's computer systems and data entry by staff. Such reports may be supplemented by staff observations.
- The data collected from AHA Language Identification Cards indicating the languages used by LEP clients.
- Analysis of staff requests for contract interpreters such as: number of requests, languages requested, and costs.

**ATTACHMENT A
FOUR-FACTOR ANALYSIS
RANDOLPH COUNTY, NORTH CAROLINA**

I. Number or Proportion of LEP Persons Eligible to be Served

A review of the population characteristics of Randolph County, North Carolina obtained from the U.S. Census Bureau (*<http://quickfacts.census.gov/qfd/states/37/37151.html>) revealed the following regarding a potential LEP individuals:

*Universe	Number	Percent of Total	Number of Households	LEP Households
Randolph County Population, 2022 Estimate	146,043	100%	55,757	6,970
Asian Persons, Percent, 2022	2,483	1.7%	970	
Persons of Hispanic or Latino Origin, percent, 2022	18,986	13%	7,416	
Language Other than English Spoken at Home, 2022	17,843	12.2%	6,970	

Because more than 1,000 families of Hispanic origin reside in Randolph County it is recommended that vital documents be translated into Spanish, as required. No written translation is required for other languages because there are fewer than 50 beneficiaries currently receiving assistance and the total number eligible is less than 5% of the Randolph County population.

II. Frequency with which LEP Persons Come In Contact with the Program

Most LEP contact experienced by AHA staff is with persons who speak Spanish. Most Spanish-speaking persons with whom AHA comes in contact are fairly fluent in English, or bring a fluent English speaking interpreter to assist. AHA has never needed or been asked to provide formal interpreters for this population as reasonable alternatives have always been possible. In the rare case contact is made with non-Spanish persons, provision or translations and interpretation services are available, but are rarely necessary.

III. Nature and Importance of the Program, Activity, or Service Provided

Many of the services provided by the AHA are not of such a vital nature that would require written translation. However, AHA will, within reason, continue to offer translation or interpretation services for all its programs or activities.

IV. Resources Available to the Recipient and Costs

Any costs associated with providing interpretation for other populations will be borne by AHA, within reason.

ATTACHMENT B

Asheboro Housing Authority Limited English Proficiency Plan

Waiver of Right to Free Interpreter Services

I, (Client Name)_____ have been informed of my right to receive free interpretive services from the Asheboro Housing Authority. I understand that I am entitled to these services at no cost to myself or other family members, but want to provide my own interpreter at this time.

I understand I can withdraw this waiver at any time and request the services of an interpreter, which will be paid for by Asheboro Housing Authority. I also understand that this waiver pertains to interpreter services only and does not entitle the interpreter to act as my Authorized Representative.

This form was translated to me orally by the interpreter indicated below.

Signature	Date
Signature of Interpreter/Staff Person	Date