



LORAIN METROPOLITAN HOUSING AUTHORITY

LANGUAGE ACCESS PLAN

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the Lorain Metropolitan Housing Authority (LMHA) housing programs. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Notice of Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Affecting Limited English Proficient Persons, published December 19, 2003 in the *Federal Register*.

LMHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).

LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this Language Access Plan (LAP), LEP persons are applicants, tenants, and participants, and parents and family members of applicants, tenants, and participants.

In order to determine the level of access needed by LEP persons, LMHA will balance the following four factors:

- (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the LMHA housing programs;
- (2) the frequency with which LEP persons come into contact with the programs;
- (3) the nature and importance of the program, activity, or service provided by the programs to people's lives; and
- (4) the resources available to LMHA and costs.

Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the LMHA.

ORAL INTERPRETATION

In a courtroom, a hearing, or situations in which health, safety, or access to important benefits and services are at stake, the LMHA will generally offer, or ensure that the family is offered through other sources, competent services free of charge to the LEP person.

LMHA hires interpreters from InterChez when necessary to provide a third party in court hearings.

LMHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits. Where feasible, LMHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.

Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by LMHA. The interpreter may be a family member or friend.

WRITTEN TRANSLATION

Translation is the replacement of a written text from one language into an equivalent written text in another language.

In order to comply with written-translation obligations, LMHA will take the following steps: LMHA will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

If there are fewer than 50 persons in a language group that reaches the 5 percent trigger, LMHA does not translate vital written materials, but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

LMHA utilizes the services of InterChez to ensure accurate translation of documents.

IMPLEMENTATION PLAN

After completing the four-factor analysis and deciding what language assistance services are appropriate, LMHA shall determine whether it is necessary to develop a written implementation plan to address the identified needs of the LEP populations it serves.

If LMHA determines that it is not necessary to develop a written implementation plan, the absence of a written plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to the LMHA's housing programs and services.

If it is determined that LMHA serves very few LEP persons, and LMHA has very limited resources, LMHA will not develop a written LEP plan, but will consider alternative ways to articulate in a reasonable manner a plan for providing meaningful access. Entities having significant contact with LEP persons, such as schools, grassroots and faith-based organizations, community groups, and groups working with new immigrants will be contacted for input into the process.

If LMHA determines it is appropriate to develop a written LEP plan, the following five steps will be taken:

- (1) Identifying LEP individuals who need language assistance;
- (2) identifying language assistance measures;
- (3) training staff;
- (4) providing notice to LEP persons; and
- (5) monitoring and updating the LEP plan.