

LIMITED ENGLISH PROFICIENCY PLAN

Section 8 and Public Housing Programs

The DMMHA has established the following Limited English Proficiency plan to ensure compliance with HUD's guidance and Executive Order 13166 issued by President Clinton in 2000 and subsequent guidance under Title VI of the Civil Rights Act of 1964. Under HUD's guidance, PHA's must take reasonable steps to ensure meaningful access to their programs and activities by person with Limited English Proficiency (LEP).

ASSESSING NEED FOR PROGRAM ACCESS:

The DMMHA will assess the following four factors in determining the need for program access for person of LEP:

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

SAFE HARBORS

In accordance with HUD safe harbors for LEP, the DMMHA will translate **written documents** for groups that are at least 5% of the population eligible or 1,000 persons, whichever is less.

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

Document Translation

- a. The DMMHA has available all translated documents that have been made available by the U.S. Department of Housing and Urban Development.
- b. As necessary per the results of the above analysis, the DMMHA may continue to offer documents in other languages as the analysis above reveals is necessary and/or upon a reasonable request from the Agency's clients or service providers serving our mutual clients.
- c. The DMMHA will evaluate the need for posting Waiting List Opening and other pertinent announcements in the most common languages encountered.

CURRENT RESOURCES OFFERED:

The DMMHA currently offers the following resources to ensure access to LEP persons:

1. Oral Interpretation Service – the DMMHA offers the Language Line Interpretation Service – if there is a non-English speaking individual that comes into the office, staff show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language and in English). The staff member calls the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the client. The

Language Line is a two line (head set) system so both the staff member and the client can be on the line at the same time. Flyers offering the Language Line Interpretation Service are posted in the Administrative Offices, have been mailed to all current residents/participants and are included in the briefing packets for both Housing Programs.

2. Bureau Refugee Services – the DMMHA works closely with the Bureau of Refugee Services within our jurisdiction.
3. Resident Participation funds are available to be used for document translation, if deemed necessary.
4. The City of Des Moines has developed a list of all City employees that speak, write, or read a language other than English fluently. The DMMHA is a City Department and may contact employees on this list for interpretation services as their schedule permits. The list is available on the City of Des Moines web-site (portal).
5. The DMMHA permits LEP persons to use an interpreter of their own choosing at their own expense (whether a professional interpreter, family member, or friend) in place of or as a supplement to the free language services expressly offered by DMMHA.

STEPS TO ENSURE ACCESS TO LEP PERSONS/PROVIDING ONGOING NOTICE TO LEP PERSONS

1. Continue to display posters and a table stand offering the Language Line Interpretation Service in the Administrative Offices.
2. Continue to include Language Line Interpretation Service flyers in the briefing packets for both Housing Programs.
3. Continue to work closely with the Bureau of Refugee Services within our jurisdiction.

STAFF TRAINING

The DMMHA will conduct staff training at least once annually, either in a group setting or by written communication with staff. The following are the items to be reviewed at each training:

1. Types of language services available;
2. How staff can obtain those services;
3. How to respond to LEP callers;
4. How to respond to written communications from LEP persons;
5. How to respond to LEP persons who have in-person contact with staff; and

MONITORING AND UPDATING THE LEP PLAN

The DMMHA will monitor the effectiveness of the LEP Plan by assessing changes in the following areas on an annual basis:

1. Current LEP populations in the DMMHA jurisdiction;
2. Frequency of encounters with LEP language groups;
3. Nature and importance of activities to LEP persons;
4. Availability of resources, including technological advances and sources of additional resources, and the costs imposed;
5. Whether existing assistance is meeting the needs of the LEP persons;
6. Whether staff knows and understands the LEP plan and how to implement it; and
7. Whether the identified sources for assistance are still available and viable.