

**DRAFT**

**Raleigh Housing Authority  
Language Access Plan (LAP)**

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## Introduction

The Raleigh Housing Authority (RHA) is committed to complying with the federal requirements of providing free, meaningful access of its services and programs to all persons. RHA acknowledges that additional and/or alternative steps may need to be taken in order to communicate effectively with Limited English Proficiency (LEP) individuals.

This Language Access Plan outlines the process and steps that RHA may take to ensure that all persons are able to access its programs and services regardless of their ability to speak, read, write or understand the English language. Periodic assessments of client needs for language assistance will be conducted based on requests for interpreters and/or translation, as well as the literacy and language skills of its clients.

## Overview

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Title VI of the Civil Rights Act is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. Recipients of federal funds must provide meaningful access to LEP persons in federal and federally assisted programs and activities.

Should Federal laws or regulations change during the time frame covered by this Plan, those changes will be effective thirty days from the date of passage. If there is any conflict between this Plan and laws/regulations, the laws and regulations will prevail. RHA's Language Access Plan is intended as guidance and does not create individual rights or entitlements nor establish RHA duties or process beyond what is required under applicable law.

Speaking, reading, or writing language can be a barrier to LEP persons in accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by RHA. The definition of LEP used in the Plan is: Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Persons with LEP may be competent in English for certain types of communication, but still be LEP for other purposes. LEP persons can be housing applicants, residents, voucher holders and parents or family members of these individuals.

## RHA Goals and Actions

RHA's goals and actions outline by this plan include:

- Conduct assessments of ongoing language access needs and services being provided.
- Identify any gaps where language assistance services need increasing or improving.
- Identify and take proactive steps at all office locations to enhance language assistance services.
- Contract with qualified and professional linguists that meet HUD language assistance service needs based on experience, education, and training certifications.

- Use data resources, such as U.S. Census data, to evaluate the extent of need for language assistance services in particular languages or dialects within Wake County.
- Utilize customer satisfaction surveys and program reviews to ensure effective LEP services.
- Research and explore practices to enhance language assistance services.
- Review policies for the recruitment, hiring, and assessment of bilingual and multilingual applicants.
- Train employees on language access policies and procedures, including how to access language assistance services to communicate and interact with persons with LEP, interpreters, and translators.
- Continue managing a program that ensures persons with LEP are provided oral language assistance services in accordance with this plan.

## Delivery of Services

RHA seeks to provide LEP and translation services at all levels of its programming and services. Efficient and effective language assistance services will be delivered at all times and to all parties conducting business with RHA including but not limited to:

- Staff and employees
- Applicants and residents
- Landlords
- Program partners

## Language Assistance and Translations

Language assistance includes the interpretation or transfer of a message from one language into another language. RHA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access. RHA staff will take reasonable steps to provide the opportunity for meaningful access to all of its clients. If a client asks for language assistance or if it is readily apparent that language assistance is needed, then RHA may reasonably determine that the client is an LEP person. RHA will make reasonable efforts to provide free language assistance and in the LEP client's preferred language when reasonable. If desired and at their own expense, LEP persons may use an interpreter of their own choosing in place of or as a supplement to the free language services offered by RHA.

### Oral Interpretation

Oral interpretation services will be provided to all LEP persons in some form as needed. RHA will handle requests for oral interpretation assistance in the following manners:

- Asking the individual whether they have a family member or friend who can assist with oral translations. It is ultimately the LEP person's decision whether or not to use family or friends as translators.
- Seeking out any bilingual/multilingual staff members who may act as translators.
- Utilizing telephonic, virtual and electronic translation services.

- Using Community Volunteers including community volunteers competent in the skill of interpreting and knowledgeable about applicable confidentiality and impartiality rules. Bringing in outside translation services when necessary. Advanced notice will be required for this service which will be paid for by the Housing Authority.

### Written Translation

RHA prioritizes the translation of written communications that are deemed vital by RHA or have a significant public impact. Vital materials can be shared in various formats including but not limited to notices, forms, agreements, letters, outreach materials, brochures, posters, flyers, announcements and notices.

Translations or translation services for written materials/correspondence if needed in certain circumstances. RHA will provide written translation of vital documents in the following circumstances:

- Written translations 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; or
- If there are fewer than 50 persons in a language group that reaches the 5 percent trigger, RHA will provide 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.

“Tag lines” or footnotes may be added to correspondence to help direct LEP persons to RHA staff for further assistance if they cannot read or understand the information provided in the correspondence.

### Alternative Formats/Translations

RHA may provide materials and translations in alternative formats upon request and as needed. This includes large print documents, American Sign Language interpreters, or braille upon request.

### Audiovisual Materials

RHA may use reasonable efforts to produce or obtain translations of any audiovisual materials it uses to inform or educate applicants, residents and other client groups.

### Digital Information

When evaluating existing and emerging technologies, RHA considers the needs of persons with LEP, the resources available to meet those needs, and the effect technology can have on the LEP population. To ensure persons with LEP have access to digital information, RHA will periodically explore cost-effective options for updating the existing IT infrastructure to improve the accessibility of translated materials on its website. These services may include:

- Explore strategies for making publicly available online information accessible to persons with LEP in accordance with assessments of LEP needs and agency capacity.

- Consider opportunities to leverage social media to increase awareness of language assistance services and products available in non-English languages to persons with LEP.
- Explore strategies to display links on the Agency’s website to indicate that documents are also available for viewing or downloading in languages other than English.

## Access and Quality

RHA will routinely assess the accessibility and quality of language access services and activities for persons with LEP. Ensuring persons with LEP receive quality and accurate language access services is critical to providing meaningful access to the Agency’s programs, services, and activities. RHA will take reasonable steps to ensure that all vendors providing language services include quality assurance and performance standards in the contracts for their services. The following criteria are taken into consideration to ensure access and quality to language assistance services:

- Vendors should understand and follow confidentiality, impartiality, and ethical rules to the same extent as Agency staff.
- RHA will contract with qualified and professional linguists that meet language assistance service needs based on extensive experience, education, and training certifications.
- Staff will monitor and track all feedback received regarding the quality of contracted linguists to ensure vendors compliance with requirements and policies.

## Staff Training

RHA will provide employee training as necessary to ensure staff understands the agency’s LEP policies and procedures. This training helps ensure that all employees are aware of the resources available, the procedures to access these resources and the points of contact for technical assistance. These efforts assist staff to effectively communicate and interact with persons with LEP. Training will be provided to new and current staff, especially those in public-contact positions, including but not limited to:

- The procedures for accessing language assistance services when encountering oral and written communications in non-English languages.
- When and how to access and utilize oral and written language assistance services.
- The dissemination of training materials that assist staff in providing meaningful access for persons with LEP.

## Complaints

Complaints may be filed with RHA’s Special Assistant, Laura McCann, if an individual believes they have not received the services set out in this Plan. Complaints should be filed within six (6) months of the alleged incident. To file a complaint with RHA, please submit complaints to:

Laura McCann  
Raleigh Housing Authority  
900 Haynes Street  
Raleigh NC, 27604  
[lmccann@rhanc.gov](mailto:lmccann@rhanc.gov)  
(919) 508-1304

## Appendix: Definitions

**Bilingual/Multilingual Staff** – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least two languages.

**Interpretation** – The act of listening to a communication in one language and orally converting it to another language while retaining the same meaning.

**Language Access** – Achieved when persons with LEP can communicate effectively with employees and contractors and participate in RHA programs and activities.

**Language Assistance Services** – Oral and written language services needed to assist persons with LEP to communicate effectively with staff, and to provide persons with LEP with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Agency.

**Persons with Limited English Proficient (LEP)** – Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Persons with LEP may be competent in English for certain types of communication, but still be LEP for other purposes. LEP persons can be housing applicants, residents, voucher holders and parents or family members of these individuals.

**Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the person with LEP. For persons with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

**Non-Vital Documents** – Includes documents and information not critical to access such benefits and services.

**Preferred/Primary Language** – The language that a person with LEP identifies as the preferred language that he or she uses to communicate effectively.

**Program or Activity** – The term “program or activity” and the term “program” mean all the operations of the Agency.

**Qualified Interpreter** – An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or is authorized to do so by contract with the Agency.

**Translation** – The replacement of written text from one language into an equivalent written text in another language.

**Vital Documents** – Paper or electronic written material that contains information that is critical for accessing a component’s program or activities or is required by law.