

Reading Housing Authority
Language Access Plan

1. Background: Reading Housing Authority (RHA) implements this Language Access Plan as an Addendum to the *Admissions and Continued Occupancy Policy* for the Public Housing Program and the *Administrative Plan* for the Housing Choice Voucher Program in effort to further detail the programs' Non-Discrimination Policies. The RHA Non-Discrimination Policy asserts the following: Reading Housing Authority will comply fully with all federal, state and local nondiscrimination laws, and with the rules and regulations governing fair housing and equal opportunity in housing and employment, including Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act (to the extent it applies; otherwise, Section 504 and the Fair Housing Amendments govern), the Violence Against Women Reauthorization Act of 2005 (and 2013), the Pennsylvania Human Relations Act of 1955 as amended, and the Nondiscrimination Ordinance of the Code of Ordinances of the City of Reading, adopted 5/29/2001, as amended. Specifically, this Plan shall accompany, and supersede, as applicable, Parts III of the *Admissions and Continued Occupancy Policy* and *Administrative Plan*.
2. Effective Date: 12/21/2017
3. Purpose: The purpose of this plan is to detail how services shall be provided to individuals with Limited English Proficiency (LEP). In accordance with the definition as supplied by the U.S. Department of Housing and Urban Development, LEP individuals are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English because of their national origin. LEP persons will be identified through a self-declaration process in their first contact with the agency when submitting a pre-application to the Public Housing or Housing Choice Voucher Program. Current residents and participants shall be required to participate in the same self-declaration process during their next annual recertification process within one year of the effective date of this Plan. The size and languages of the application population shall be estimated, and the size and languages of the resident/participant population shall be determined, upon acquisition and analysis of one year of data collection. It is anticipated at the time of the effective date of this plan that Reading Housing Authority shall expect to serve a significant population of LEP persons who have limited ability to read, write, speak or understand English who instead possess the skills to read, write, speak or understand in the Spanish language. LEP data shall be amassed and assessed on an annual basis so as to determine any change to the demographics of the jurisdiction's LEP populations, and resultantly, to this Plan.
4. Types of Contact: RHA anticipates contact with applicants, residents and participants to occur in-person, by telephone and in writing. RHA shall deliver language assistance orally, with Spanish-speaking staff who conduct routine business in Spanish, through interpretation, or oral translation between speakers who speak different languages, and through the translation of written documents.

Within six months of the effective date of this plan, RHA shall introduce a new, interactive telephone system that includes an option for the caller to receive information in Spanish.
5. Outreach: All official efforts made by Reading Housing Authority that are intended to promote program participation and services to applicants, residents and participants are conducted to ensure access by members of the Spanish-speaking LEP community, including written publications regarding the opening of waiting lists in English and Spanish-language publications and dual-language announcement of the agency's Annual Plan Public Hearing.

As of the effective date of this Plan, RHA has engaged in a contract for the development of a new agency website, which will serve as a primary source of outreach to individuals of all languages, and which will incorporate the technology for translation of materials from English to Spanish.

Within 120 days of the effective date of this Plan, RHA shall post signage in Spanish in offices informing residents of their right to free language services, with instructions to the applicant, resident or participant to point to the sign if they are in need of this service.

Within 120 days of the effective date of this Plan, RHA will post signage in English and Spanish in offices demonstrating the agency's compliance with Fair Housing.

Within 30 days of the effective date of this Plan, RHA will post this Plan in all offices and community spaces, and ensure publication upon the agency's website upon completion of update.

6. Oral Language Access and Interpretation Services: RHA will provide oral language access to applicants, residents, and participants via (1) direct communication with bilingual staff in the LEP individual's language and (2) interpretation. RHA will continue to hire direct-service personnel for all program offices by making use of the Pennsylvania State Civil Service Commission selective certification process for otherwise-qualified candidates who demonstrate proficiency in the Spanish-language. As of the effective date of this Plan, 80% of front-line staff are bilingual in English and Spanish, and conduct business in both languages on a daily basis. For most oral language access needs, RHA will rely on bilingual staff, who will communicate directly with LEP applicants, residents, and participants in Spanish. When an LEP applicant, resident, or participant is communicating with a staff member who does not speak their language, RHA will provide interpretation services.

Interpretation services will be delivered free of charge. In most cases, interpreting services will be provided by an employee of the same office or program who is bilingual, is trained on serving as an interpreter, and has no additional role to perform in the appointment or meeting other than to serve as an interpreter. If necessary due to workflow demands, RHA will make use of an employee with the same qualifications from a different office. The need for interpretation will be determined by making use of the self-declared position of the applicant, resident or participant, and its subsequent submission into the client's electronic record. For the first 12 months following the effective date of this Plan, in accordance with #3 of this Plan, the RHA employee responsible for conducting the event will require the resident or participant to complete an LEP Self-Declaration Form in advance of the meeting, so as to ascertain the need for oral language access and/or interpretation and edit the electronic record.

An LEP-applicant, resident or participant may request and receive either interpretation or services via bilingual staff at any time for any resident, applicant or participant-initiated meeting. Services via bilingual staff or interpretation will be provided as quickly as possible.

RHA shall never ask applicants, participants or residents to bring their own interpreter, and will not make use of informal interpreters, such as family or friends, unless the applicant or tenant was first offered the opportunity to receive interpretation through the above protocols. Under no circumstances will RHA make use of minor children for interpreting services. Applicants, residents or participants who elect to make use of an informal interpreter shall be required to sign a release form, which shall include an acknowledgement that he/she/they elect to waive the right to privacy and confidentiality.

Interpreting services will be made available at all RHA-hosted meetings that are open to all residents, participants, or applicants, or to a program or development's residents or participants, or to the public, using the above-described employee protocols.

Within 60 days of the effective date of this plan, RHA shall engage the services of LanguageLine Phone Interpreting Services or its equivalent when faced with the need to serve an individual whose LEP needs exist for a language other than Spanish.

Within 120 days of the effective date of this plan, RHA shall implement use of the 2004/2010 U.S. Census Language Identification Flashcard form, referred to as the "I Speak Flashcard" at www.lep.gov. when encountering an applicant who does not self-declare through the pre-application process that he/she is an LEP individual who speaks Spanish.

7. Document Translation: RHA will continue to take steps to translate all documents that are presently in place for applicants, residents and participants into Spanish-language equivalents. All standardized documents that originate after the effective date of this Plan will be considered final only upon preparation in both languages. Within one year of the effective date of this agreement, RHA shall catalogue, vet and amend all operational documents that are crafted by the agency and placed in use for applicants, residents and participants, beginning with those documents vital to application and ongoing eligibility. The projected timelines (calculated from the effective date) for the review, amendment and translation of vital documents are as follows:
- a. Recertification Forms – Within 60 days
 - b. Resident Handbook – Within 60 days
 - c. Lease Agreements – Within 3 months
 - d. Application forms, documents & consent forms – Within 4 months
 - e. Notices related to the requirement for further information or denial of eligibility – (There are more than 10 versions) – Within 6 months
 - f. Notices of proposed lease termination and eviction (There more than 36 versions.) – Within 8 months
 - g. Notices and forms related to grievances and hearings – Within 10 months
 - h. Notices related to other ancillary services – Within 12 months

RHA shall make use of fee-based professional translation contractor and an internal translation committee for the translation of standardized documents.

Translation of sporadic or short-term use notices will be translated by bilingual office staff, making use of a Translation Committee Glossary for commonly-used words and phrases.

Because of cost implications, RHA reserves the right under this Plan to forgo translation of individualized documents that are expected to have limited value for repeat use unless the applicant, resident or participant makes a written request for such translation, in any language with which he or she possess proficiency. LEP individuals with proficiency in Spanish will be informed through use of the Spanish-language translation of the following, to be added to any document that is prepared in English-only, of the following: *This document is prepared in English only, but will be translated at no cost upon written request.*

8. Staff Training: Within 90 days of the effective date of this Plan, RHA will conduct training of all staff that have contact with applicants, residents or participants regarding the obligations under Title VIII and Title VI from a HUD-approved fair housing agency, and simultaneously provide training on the requirements of all staff under this Plan. Future employees will receive internal training on this Plan within 30 days of hire. Refresher training for all staff will occur every two years. Supervisory staff will receive training on all required documentation and record-keeping procedures incorporated into this Plan.

RHA will also deliver training to staff members who will serve as interpreters, including the role of the interpreter, confidentiality and impartiality.

9. Oversight: Oversight of this Plan shall be the responsibility of the Deputy Executive and Executive Directors, who oversee staff training needs, compliance with, and updates to all policies and procedures including the *Admissions and Continued Occupancy Policy* and *Administrative Plan*, and receive all internal complaints to be channeled through the grievance process.