



Metro West Housing Solutions

LANGUAGE ASSISTANCE PLAN (LAP)

August 2024

1. INTRODUCTION

Metro West Housing Solutions (MWHS) is committed to improving the accessibility of its programs and services to eligible non-English speakers and limited English proficient (LEP) persons. MWHS has prepared this Language Assistance Plan (LAP) to reduce barriers and ensure meaningful access to services, programs, and activities on the part of LEP persons.

On January 22, 2007, the U.S. Department of Housing and Urban Development (HUD) issued Final Guidance to recipients of HUD funding concerning compliance with the Title VI prohibition against national origin discrimination affecting LEP persons. HUD's Final Guidance defines a four-factor self-assessment method which assists agencies receiving HUD funds in determining the extent of their obligations to provide LEP services. Based on the Final Guidance, MWHS completed a LEP self-assessment.

Using the LEP self-assessment as a guide, MWHS has prepared this Language Assistance Plan (LAP) which defines the actions MWHS will take to ensure Title VI compliance with respect to LEP persons. MWHS will periodically review and update this LAP to ensure continued responsiveness to community needs and compliance with Title VI.

2. GOALS OF THE LANGUAGE ASSISTANCE PLAN

The goals of the MWHS Language Assistance Plan are:

- a. To ensure meaningful access to MWHS' Federally Assisted Programs and accessibility by all eligible individuals regardless of primary language spoken.

- b. To ensure that all LEP individuals are aware that MWHS will provide free oral interpretation services to facilitate their contacts with and participation in MWHS programs either in person or through a language interpretation line.
- c. To provide written translations of vital documents to LEP individuals in accordance with HUD's "safe harbor" guidelines.
- d. To ensure that MWHS staff are aware of available language assistance services and how these services are used when serving LEP individuals.
- e. To provide for periodic review and updating of language assistance plans and services in accordance with community needs.
- f. To hire, when possible, bilingual staff members.

3. LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

The City of Lakewood Colorado is a diverse community in which LEP households reside. MWHS obtained information from the U.S. Census Bureau's website to gather data about the City's overall population as well as the population of LEP persons within the jurisdiction.

The data reveals the following:

- The City of Lakewood population is 23.1% Hispanic, 66.6% non-Hispanic White, 2.5% non-Hispanic Black or African American, 3.6% Asian, 0.3% non-Hispanic/some other race alone, and 3.7% Two or more races.
- 12.9% of the City's population (5 years and older) speaks a language other than English at home. Of this population, 8.4% speaks Spanish, 1.8% speaks other Indo-European languages, 2.2% speaks Asian and Pacific Island languages, and 0.4% speaks other languages.
- 3.7% of the City's population (5 years and older) speaks English less than "very well". Of this population, 24.8% speaks Spanish, 22.5% speaks other Indo-

European languages, 44.2% speaks Asian and Pacific Island languages, and 42.3% speaks other languages. Note: a large margin of error exists for this set of data.

- Five percent of households in the city have limited ability to speak English. Of the total number of households in the city, >1% speaks Spanish with limited ability to speak English, >1% speaks other Indo-European languages with limited ability to speak English, >1% speaks Asian and Pacific Island languages with limited ability to speak English, and >1% speaks other languages with limited ability to speak English.

The data collected revealed that 12.9% of the City's population (5 years and older) speaks a language other than English at home. Of this population, Spanish is the predominant language at 8.4%. Based on this information MWHS will continue to make available translated documents and access to oral translators for the Spanish speaking population. An analysis of MWHS programs and services revealed that most requests for language assistance involve Spanish speaking clients.

It was determined through review of this data for the City of Lakewood, as recommended by HUD that Spanish was the only language to meet the 4 factor analysis criteria (1 – Number or proportion of LEP persons served or encountered in the eligible service area; 2 – Frequency of contact with the program; 3 – Importance of service, information, program or activity; 4 – Costs versus resource and benefits) requiring translation of vital documents. This was supported by the volume of encounters with LEP persons where the majority was Spanish speaking.

Other language groups in the City of Lakewood had few LEP persons and therefore did not meet the threshold to require written translation of vital documents into those languages. MWHS will continue to provide oral translation as needed and written translation if available to LEP persons requesting such services.

4. TYPES OF ASSISTANCE NEEDED BY LEP PERSONS

Most contacts between MWHS and LEP persons are meetings, written communications, and phone calls where information is exchanged. Other contacts involve the exchange and review of printed materials, some of which may be considered "vital documents." HUD's Final Guidance defines vital documents as, "*any document that is critical for*

ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically."

MWHS will periodically review and update documents which are vital to applicants and residents which include the HUD HCV Voucher, HUD Tenancy Addendum and the MWHS HCV standard lease.

5. LANGUAGE ASSISTANCE TO BE PROVIDED

To promote equal access to MWHS programs and services by LEP individuals, MWHS will implement the following array of language assistance services.

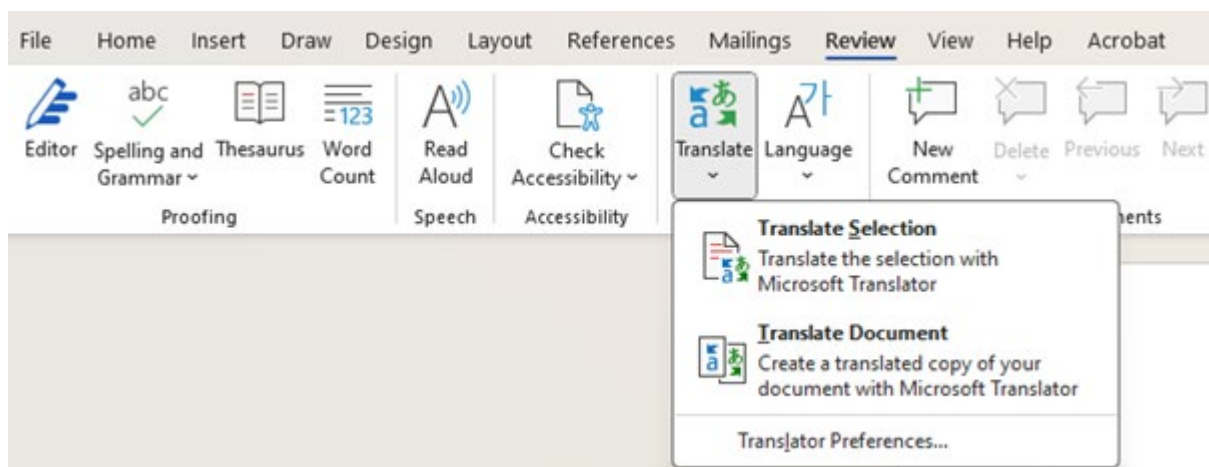
A) Identification of LEP Persons and Notices:

- *Identification of LEP Persons and Notices – Use of "I Speak Cards":* To help identify LEP individuals and determine the appropriate language assistance, MWHS will make available "I Speak Cards" at its central office and MWHS site-based management offices. Applicants, residents, and HCV participants can use these cards to indicate their primary language. MWHS staff at the point of entry will then make appropriate arrangements for interpretation services, using a bilingual staff person, a qualified third-party interpreter identified by the applicant/participant, or a telephone interpretation service. In the instance that a LEP individual is unable to make use of the "I Speak Cards" because of illiteracy or disability, MWHS staff will make reasonable efforts to ascertain interpretation needs and provide interpretation services in an alternative manner.
- *Notice of Oral Interpretation Services:* MWHS will provide free access to either bilingual staff or telephone interpretation services for all contacts with LEP individuals. MWHS will prominently post multi-lingual notices at its central office waiting rooms and MWHS site-based management offices, which indicate that free oral interpretation services are available upon request.
- *Language Preferences of Residents and Applicants:* At initial application, MWHS "Yardi" software asks each applicant to state their preferred language for communication purposes. Each Assisted Housing Specialist can view the application to determine language assistance needs.

B) Language Assistance Measures:

- *Oral Interpretation – Staff:* Where feasible, bi-lingual staff will be deployed to communicate with LEP individuals in their native languages and to assist them in reviewing materials, answering questions about MWHS programs, and responding to forms and information requests. Currently, 50% of MWHS HCV staff speak Spanish which is the non-English languages spoken most frequently by eligible persons served by MWHS.
- *Oral Interpretation – Telephone Support:* MWHS utilizes the services of a professional telephone interpretation service in limited instances where there are no viable alternatives (i.e., bilingual staff). When these contacts involve review of program forms and procedures, MWHS will schedule the call so that the telephone translator can review the relevant form or procedure. The MWHS Human Resources Department is responsible for maintaining a list of Interpreters outside the organization.
- *Oral Interpretation – Use of Other Interpreters not provided by MWHS:* As noted above, LEP individuals will be informed that MWHS will provide them with free access to oral interpretation services via bilingual staff or a professional telephone interpretation service, as needed. If the LEP individual requests their own interpreter, this will be permitted at the individual's own expense. Use of family members and friends, especially minor children, as interpreters will be discouraged. Exceptions may be made where the contact with the LEP person is of a routine nature, one that does not involve confidential matter, or significant/complex matters impacting the applicant or resident's housing status, rent payments, or lease compliance issues. MWHS will not be liable for the translation provided by the LEP individual's own translator. Staff will be alert to the potential for any conflict of interest or competency issues that may arise from the involvement of family or friends, such as in domestic violence situations.

- *Written Translation:* MWHS will strive to translate documents that are vital to meaningful program access as resources permit and in consideration of the four factors non-English languages, currently Spanish. MWHS staff may access translated documents on the HUD website https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a
- MWHS staff may utilize the “Translate” feature in Word software to translate any Word document into any language. The instructions are as follows:
 1. Open Word and on the top menu bar select **Review > Translate**.
 2. You can either select a section of the document or the entire document for translation.
 3. Once selected, this brings up the translator so you can choose the language you would like the document or section translated from and to.



This same feature/tool may be accessed in Outlook, Excel, and PowerPoint.

C) Staff Training and Coordination:

- MWHS will provide training on LEP awareness and required assistance actions under the Language Assistance Plan for employees.

This will include:

- Dissemination of the LAP: MWHS will post its LAP on its website and distribute it to relevant program staff.

- Staff Training: MWHS will train relevant staff regarding their LAP responsibilities. It is important that staff who are likely to have contact with LEP populations and who will be responsible for implementing the protocols described above are trained to know how to respond to LEP persons.

- LEP Coordinator: MWHS will designate a staff member as the LEP Coordinator, responsible for ongoing updating of the LEP analysis, addressing staff, and providing ongoing LEP training.

D) Monitoring and Updating the Language Assistance Plan:

The LAP will be reviewed every two years as part of the Annual Plan process and updated, if needed. The review will assess:

- Whether there have been any significant changes in the composition or language needs of the LEP population in the City of Lakewood.

- A review to determine if additional vital documents require translation.

- A review of any issues or problems related to serving LEP persons which may have emerged during the past two years; and,

- Identification of any recommended actions to provide more responsive and effective language services.