

Hamilton Township Office of Housing

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

A. PLAN STATEMENT

Hamilton Township Office of Housing has adopted this plan to provide access to its programs and activities by person with Limited English Proficiency (LEP). A Limited English Proficient (LEP) person is a person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. In accordance with federal guidelines, Hamilton Township Office of Housing will make reasonable efforts to provide to arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing and other Hamilton Township Office of Housing programs.

B. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

Hamilton Township Office of Housing will periodically access and update the following four-factor analysis, including but not limited to:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Hamilton Township Office of Housing.
1. The frequency with which LEP person using a particular language come into contact with Hamilton Township Office of Housing.
2. The nature and importance of the Hamilton Township Office of Housing program, activities or services to the person's life.
3. Hamilton Township Office of Housing's resources and the cost of providing meaningful access.

C. LANGUAGE ASSISTANCE

1. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language; and/or translation, which means the written transfer of a message from one language into another language. Hamilton Township Office of Housing will determine when interpretation and/or translation are needed and are reasonable.
2. Hamilton Township Office of Housing has the discretion to determine whether language assistance is needed, and if so, the type of language assistance to provide meaningful access.
3. Translation of Documents:

- a. Hamilton Township Office of Housing will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in an LEP group and other relevant factors. Hamilton Township Office of Housing will undertake this examination when an eligible LEP group constitutes 5% of an eligible client group (for example, 5% of households living in Hamilton Township) or 1,000, whichever is less.
- b. If Hamilton Township Office of Housing determines that translation is necessary and appropriate, it will translate selected mailing and documents of vital importance into that language.
- c. Hamilton Township Office of Housing will consider technological aids such as Internet-based translation services.
- d. Hamilton Township Office of Housing will use/purchase documents, such as H.U.D. forms and TAA forms, that are available in other languages as needed.

4. Audio-visual materials

Hamilton Township Office of Housing will use reasonable efforts to produce or obtain multiple translations of audio-visual materials it uses to inform or educate applicants, residents, and other client groups.

5. Formal Interpreters

- a. When necessary to provide meaningful access for LEP clients, Hamilton Township Office of Housing will provide qualified interpreters, including Hamilton Township bilingual staff and contract vendors. At important stages that require one-on-one contact, written translations and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- b. Hamilton Township Office of Housing may require a formal interpreter to certify to the following:
 - (1) The interpreter understood the matter communicated and rendered a competent interpretation.
 - (2) The interpreter is covered by the Privacy Act and will not disclose non-public data without written authorization from the client.
- c. Formal Interpreters shall be used at the following;

- (1) Formal hearing for denial of admission to public housing;
- (2) Informal settlement conferences and formal hearing for termination of public housing.

6. Informal Interpreters

- a. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Hamilton Township Office of Housing staff will determine whether it is appropriate to rely on informal interpreters, depending upon circumstances and subject matter of the communication. Issues such as confidentiality, competency, or conflict of interest will be considered.
- b. An LEP person may use an informal interpreter of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by Hamilton Township Office of Housing. If possible, Hamilton Township Office of Housing should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- c. If an LEP client wants to use their own informal interpreter, Hamilton Township Office of Housing reserves the right to also have a formal interpreter.

D. MONITORING

1. Hamilton Township Office of Housing will review and revise this LEP Plan annually. The review will include:
 - a. Reports from Hamilton Township Office of Housing staff on the number of Hamilton Township Office of Housing clients who are LEP.
 - b. A determination as to whether 5 % or 1,000 persons from a Hamilton Township Office of Housing client group speak a specific language, which triggers consideration of document translation needs as described above
 - c. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.

E. LEP PLAN DISTRIBUTION AND TRAINING

The LEP Plan will be

1. Distributed to all Hamilton Township Office of Housing employees
2. Available to the Public for review via the Township Clerk's OPRAH request
3. Posted on the Hamilton Township website
4. Explained in orientation to all new staff members who need to communicate with LEP clients.