

Limited English Proficiency Plan

I. PLAN STATEMENT

The Fort Mill Housing Services, Inc. (FMHSI) has adopted this plan to provide meaningful access to its program by persons with Limited English Proficiency (LEP). The demographics of the State of South Carolina are changing and FMHSI is making adjustments to provide housing to eligible families in the jurisdiction, regardless of the language spoken. In accordance with federal guidelines FMHSI will make reasonable efforts to provide or arrange free language assistance for its LEP clients with any FMHSI program.

II. MEANINGFUL ACCESS

Meaningful access is free language assistance in accordance with federal guidelines. FMHSI will periodically assess 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 FMHSI.
2. The frequency with which the LEP persons using a particular language come into contact with FMHSI.
3. The nature and importance of the FMHSI program, activity or service to the person's life.
4. FMHSI's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable when the costs imposed substantially exceed the benefits.

III. LANGUAGE ASSISTANCE

- A person who does not speak English as their primary language and has a limited ability to read, write, speak or understand English may qualify as a LEP person and may be entitled to language assistance in regards to FMHSI programs and activities.
- Language assistance includes **interpretation** (oral or spoken transfer of a message from one language to another) and **translation** (written transfer of a message from one language to another). FMHSI will determine when interpretation or translation are needed and are reasonable.
- FMHSI staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If the client requests language assistance and FMHSI determines LEP eligibility and necessary language assistance is in order to provide meaningful access, then FMHSI will make

reasonable efforts to provide free language assistance in the client's preferred language if possible.

- FMHSI has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

IV. TRANSLATION OF DOCUMENTS

- FMHSI will weigh the costs and benefits of translating 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. FMHSI will undertake this examination process when an eligible LEP group constitutes an eligible client group that would benefit from the translation of documents.
- If FMHSI determines that translation is necessary and appropriate, the following documents will be translated:
 - Lease
 - Tenant Based Rental Assistance Voucher, Tenancy Addendum and Rental Assistance Contract
 - Program Requirements (such as income verifications/changes in household composition)
 - Affordable Application and/or Tenant Based Rental Assistance Voucher Application
- As opportunities arise, FMHSI may work with other housing office to share the costs of translating common documents.
- HUD may provide prototype translations of standard housing documents in multiple languages. FMHSI will use such documents, as needed.
- FMHSI will consider technological aids such as Internet-based translation services that may provide helpful, although not authoritative, translations of written materials.
- A language chart will be available at all office locations for the LEP person to show which language they speak, if no English is spoken.

V. FORMAL INTERPRETERS

- When necessary to provide meaningful access for LEP clients, FMHSI will provide qualified interpreters, including contract vendors and bilingual staff if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided.

- FMHSI may require a formal interpreter to certify the following
 - The interpreter understands the matter being communicated and can render a competent interpretation.
 - The interpreter will not disclose non-public data without written authorization from the client.
- Formal interpreters shall be used at the following:
 - Formal hearing for denial of admission to affordable housing
 - Informal settlement conference and formal hearing for termination of affordable housing
 - Hearings or conferences concerning denial or termination of Tenant Based Rental Assistance Voucher participation
- A FMHSI staff interpreter may not be a subordinate to the person making the decision
- The following chart represents cost for professional translating organizations.

Company Name	Phone	Oral Translation	Written Translation
ABC TRANSLATION		\$35.00/HR	\$35.00/PAGE
VICE VERSA TRANSLATION		\$95.00/HR	\$95.00/PAGE
TRANSLATION UNLIMITED		\$40.00/HR	\$50.00/PAGE

VI. INFORMAL INTERPRETERS

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Staff will determine whether it is appropriate to rely on informal interpreters, depending on the circumstances and the subject matter of the communication. However in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest. Should a family decline use of a formal interpreter, FMHSI may request that a participant sign a waiver form.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or supplement to the free language assistance offered by FMHSI. If possible, FMHSI should accommodate a LEP client's request to use an informal interpreter in place of a formal interpreter.

- If an LEP client prefers an informal interpreter, after FMHSI has offered free interpreter services, the informal interpreter may interpret.

VII. **OUTSIDE RESOURCES**

- Outside resources may include community volunteer, FMHSI residents, or Tenant Based Rental Assistance participants.
- Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.
- FMHSI works with outside agencies and organizations that assist specific cultural and ethnic group living throughout the jurisdiction. To help their clients obtain or keep housing assistance through FMHSI, these organizations may provide qualified interpreters for LEP persons.

VIII. **MONITORING**

FMHSI will review and revise this LEP Plan as needed. The review may include, but is not limited to:

1. Reports on the number of FMHSI clients who are LEP, to the extent that the extent that our software and staff data entry can provide such information. Reports may also be supplemented by staff observation.
2. Reports listing the languages used by LEP clients.
3. A determination as to whether the client population group speak a specific language, which triggers consideration of document translation needs as described above.
4. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.

IX. **LEP PLAN DISTRIBUTION AND TRAINING**

The LEP Plan will be:

- Distributed to all FMHSI Staff
- Available in the Housing Authority's office
- Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.