



San Francisco Housing Authority Policy: Limited English Proficiency Plan

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1.0 Date of Implementation; Approval Authority; Policy Number

Policy Number 2: Approved October 28, 2016; Effective January 1, 2017

Policy Number 1: Effective May 24, 2010

2.0 Purpose of the Policy & Plan Statement

The San Francisco Housing Authority (SFHA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with Federal guidelines, the SFHA will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8/Housing Choice Vouchers, homeownership and other SFHA programs.

3.0 Detailed Policy Statement

3.1 Meaningful Access: Four Factor Analysis

Meaningful access is free language assistance in accordance with Federal guidelines. No less than every five (5) years, The SFHA will 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 the SFHA;
- 2) The frequency persons using a particular language come into contact with the SFHA;
- 3) The nature and importance of the SFHA program, activity or service to the person's life;

- 4) The SFHA’s resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

3.1.1 Factor One

The number or proportion of LEP persons eligible to be served or likely to be encountered by the SFHA:

This determination will be made based on U.S. Census Bureau data and language preference data compiled by the SFHA. The U.S. Census Bureau’s American Fact Finder for the City and County of San Francisco (City) provided the following 2014 statistics for the total population (805, 235):

RACE	Total	Percentage
WHITE	420,823	52.3%
BLACK	57,810	7.2%
AMERICAN INDIAN	10,873	1.4%
ASIAN	288,529	35.8%
NATIVE HAWAIIAN AND OTHER PACIFIC ISLANDER	6,173	.8%
OTHER	62, 482	7.8%

The SFHA language preference data compiled by reports generated from the SFHA ELITE software client file computer system, produced the following statistics on clients we currently serve:

LANGUAGE	TOTAL	PERCENTAGE
Cantonese	12780	22.91%
Russian	2958	5.30%
Spanish	3715	6.66%
Vietnamese	3283	5.88%

A determination as to whether five (5) percent of the SFHA clientele speaks a specific language will trigger consideration of vital document translation.

3.1.2 Factor Two

The frequency with which LEP persons using a particular language come into contact with the SFHA.

This determination will be made by analyzing the data in our ELITE software system to project the anticipated number of contact points a client may have with the SFHA. The SFHA will also retain copies of sign in sheets for reference and analysis as well on an as needed basis.

3.1.3 Factor Three

The nature and importance of the SFHA program, activity or service to the person's life.

The SFHA adheres to the philosophy that housing is essential and extremely important. Thus, when a staff member engages a client in a discussion involving the client's rights to benefits, programs or services offered by the SFHA, the staff member must determine whether failure to provide language assistance would result in a substantial delay that would adversely affect the client's rights.

3.1.4 Factor Four

The SFHA's resources and the cost of providing meaningful access.

The SFHA will utilize a combination of procured vendors and the SFHA verified multi-lingual staff members as professional, competent translators and interpreters. The SFHA will procure qualified vendors to provide written translations of vital documents, as well as oral interpretation for languages not spoken by SFHA staff members. SFHA staff members who agree to serve as oral interpreters will receive additional compensation for demonstrating proficiency in multiple languages, participating in interpreter/cultural competency training, and serving as oral interpreters.

Additionally, the SFHA will establish partnerships with City departments/agencies and community organizations to provide volunteer interpreter services for our clients, as alternative when professional interpreters (procured vendors and SFHA staff members) are unavailable. The SFHA will allow clients to waive their right to professional and/or volunteer language services, so that clients may utilize friends or family members (who are not minors) as oral interpreters.

3.2 Language Assistance

A person who does not speak English as their primary language and/or who has a limited ability to read, write, speak or understand English may be a Limited English Proficient (LEP) person and is therefore entitled to language assistance with respect to SFHA programs and activities.

SFHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. The staff will use the LEP Language Chart to identify the languages spoken/written by the applicants/participants. Staff will also use the Personal Declaration form at every admission and re-certification to update the translation/interpretation services needed for each household.

The SFHA will assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients.

The SFHA will distinguish between language assistance provided in the form of 1) written translations, and 2) oral interpretations.

3.2.1 Written Translations

The SFHA 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, and other relevant factors. The SFHA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group.

Based on the Four-Factor analysis, SFHA translates vital documents to Chinese (Cantonese), Russian, Spanish and Vietnamese. Vital documents are listed in the LEP Plan Procedure.

A client may request oral interpretations of the above documents into languages not listed above. A client may also request oral interpretations of documents not translated.

As opportunities arise, the SFHA may work with other housing authorities to share the costs of translating common documents, which may include language groups, which currently do not reach the threshold level in the SFHA's client population.

The SFHA will require a client to certify that the client understood the document translated with the Translation Certification Document.

The SFHA staff member will also explain to the client that any written translations of SFHA or HUD forms are not the official/legal version of the form. Vital document translations are used for the sole purpose of helping the LEP client understand the contents of the document. When a staff member uses a vital document translation to help a client understand a document, the client will only sign documents and forms in the English version.

3.2.2 Oral Interpretations

The SFHA will provide interpreters, including multi-lingual staff and procured vendors in accordance with this plan. Written translation and verbal interpretation services will be provided consistent with the four-factor analysis detailed above and in accordance with the “Vital and Document(s) List”.

In cases of Formal/Informal Hearings an SFHA staff interpreter may not be a subordinate to the SFHA staff member rendering a decision on the client’s hearing.

The SFHA will monitor LEP in accordance with the LEP Procedures..

After the SFHA has offered free interpretation services, an LEP client may prefer to use an informal interpreter, such as a friend or family member (who is not a minor), and the informal interpreter may interpret. In these cases the client and interpreter of choice will sign a waiver of free interpreter services.

4.0 *Applicability*

This policy applies to all regular management and staff of the SFHA. Failure to comply with this policy can result in disciplinary action up to termination of employment. SFHA staff will receive training on the LEP Plan and Procedure every two (2) years and within six (6) months of hire.

5.0 *Implementation Procedures*

The implementation procedures for this Plan are attached herein.

6.0 *Interested Interpreters:*

Residents who are interested in interpreting or providing translation services are invited to call 415-715-5200 and provide their contact information. The SFHA will create a list of resident interpreters that may be contacted when their services are needed. The list will be maintained by the SFHA and is not accessible to the public. Resident interpreters will not be used for individual client matters to

protect their privacy. A stipend, to be determined by the SFHA, will be provided when the services are utilized.