

# **Translating Policy into Practice**

**Title VI and Limited English  
Proficiency by  
The Department of Housing and  
Urban Development**

# **Focus of Presentation**

- **Meaningful Access for Individuals who are Limited English Proficient (LEP)**
- **Demographics and Legal Background**
- **Identifying the Need for Language Services (four factor analysis from the guidance)**

# Focus of Presentation

- **Meaningful Access For Individuals with Limited English Proficiency (LEP)**
- **Background**
- **Identifying the Need for Language Services (four factor analysis from the guidance)**
- **Responding to the Need (types of language assistance)**
- **Elements of an Effective Plan**

# **A NOTE ON MISSION**

**HUD recipients provide many critical services, benefits, and information.**

**Many recipients have already developed practices and tools that respond to the needs of the communities they serve.**

# Number or Proportion

- **From particular language group;**
- **Eligible to be served or encountered;**
- **The greater the number or proportion, the more likely pre-arranged language services are needed.**

# Frequency of Contact

- **Of particular language groups;**
- **With the recipient;**
- **Also consider frequency/intensity of individual contact;**
- **Greater frequency = greater need for enhanced language services**

# **Nature or Importance of Service/Benefit**

- **To the LEP person;**
- **Think of consequences of failure to communicate effectively;**
- **The more important the contact, the more likely timely, high quality language services needed.**

# **Resources Available, Including Costs**

- **Resources of recipient;**
- **Costs of providing different types of language services;**
- **Reasonable steps;**
- **Amortize translation costs (and share resources);**
- **Carefully explore all options before limiting access based on this factor.**



# **Options for Providing Language Assistance**

# **What Are Your Options for Oral Language Services?**

- **Bilingual staff;**
- **Staff interpreters;**
- **Contract interpreters;**
- **Telephonic interpretation services;**
- **Formal agreements with community volunteers;**
- **Note on informal interpreters.**

# Competency Issues

- **Proficiency in both languages (note difference between interpreter and bilingual person);**
- **Mode of interpreting;**
- **Special vocabulary;**
- **Knowledge of regionalisms;**
- **Confidentiality;**
- **Role as interpreter.**

# **Consider Safe Harbors for Translation of Documents for General Public**

- **Vital documents translated if:**
- **Language group constitutes 1000 or 5% of population of persons eligible to be served or likely to be affected or encountered; or**

# **Consider Safe Harbors for Translation of Documents for General Public**

- **If fewer than 50 person in a language group that reaches 5%:**
- **Provide written notice in the primary language of the LEP group of the right to receive competent oral interpretation of the documents, free of cost.**

# Translations

- **Vital documents**
- **Quality Control**

# **Vital Documents Might Include (per HUD Guidance)**

- **Consent and complaint forms;**
- **Important intake forms;**
- **Written notices of rights, denial, loss, or decreases in benefits or services;**
- **Notices of eviction;**

# **Vital Documents Might Include (per HUD Guidance)**

- **Notices advising of language assistance;**
- **Leases and tenant rules; and/or**
- **Applications.**



# Vital General Documents

- Note that safe harbor focuses on translations only. **Interpretation should be available in many cases in which safe harbors do not apply.**

# **Ideas for Quality Control of Translated Documents**

- **Consider asking for accreditations or certifications (not always available);**
- **Consider asking references;**
- **Consider having an independent translator “check” the work.**

# **Ideas for Quality Control of Translated Documents**

- **Consider back translation, where appropriate;**
- **Consider many of the same competency issues as interpreters regarding knowledge of special vocabulary, target audience, etc.**

# **LEP Implementation Plan**

- **Written, Update periodically**
- **For use by staff**
- **Contain clear goals**
- **Establish performance measures**
- **Describe how management will be held accountable**
- **Provide opportunity for input in planning and revision stage**

# **Five steps- Implementation Plan**

- **Identifying LEP individuals who need language Assistance**
- **Conducting Language Assistance Measures**
- **Training Staff**
- **Providing Notice to LEP persons**
- **Monitoring and Updating Plan**

# **Basis for Language Assistance Plan**

- **Language assistance is free of charge**
- **Written**
- **Clear goals**
- **Performance measures-goals**
- **Community input**

# **Step I: Identifying LEP Individuals who Need Language Assistance**

- **How to identify language needs?**

- ✓ **Use "I Speak" language card**

**[http://www.usdoj.gov/crt/cor/  
Pubs/ISpeakCards.pdf](http://www.usdoj.gov/crt/cor/Pubs/ISpeakCards.pdf)**

- ✓ **Maintain record of languages encountered**

# **Step I: Identifying LEP Individuals who Need Language Assistance**

- ✓ **Post notices of  
commonly encountered  
languages**
- ✓ **Self identification**



# **Step II: Language Assistance Measures**

- **What should be included in an effective language plan?**
  - ✓ **Types of language services available – written translations/verbal interpreters;**
  - ✓ **How can the staff obtain these services**
  - ✓ **How to respond to written communications**

# **Step II Language Assistance Plan**

- ✓ **How to respond to LEP persons who have in-person contact with recipient staff; and**
- ✓ **How to ensure competency of interpreters and translation services**

# **Step III: Training Staff**

- **Training should be provided to ensure that the staff:**
  - ✓ **Know about the LEP policies and procedures**
  - ✓ **Know how to work with the public**

# Step III: Training Staff

- **In developing training programs:**
  - ✓ **Flexibility;**
  - ✓ **Type of Training: Orientation or part of continuing training**
  - ✓ **Who to train?**

# **Step IV: Promoting Notice to LEP Persons**

- **Make the beneficiaries know of availability of services**
  - ✓ **Posting signs;**
  - ✓ **Distributing outreach documents**
  - ✓ **Partnering with local groups**
  - ✓ **Using telephone voice mail**
  - ✓ **Including notices in minority media**
  - ✓ **Making presentations at places of worships, schools**

# **Step V: Monitoring and Updating the LEP Plan**

- **Periodically review of applicability of plan focusing on:**
  - ✓ **Frequency of contact**
  - ✓ **Nature and Importance**
  - ✓ **Availability of resources**
  - ✓ **Needs of beneficiaries**
  - ✓ **Staff ability**
  - ✓ **Availability of partners**

# **Step V: Monitoring and Updating the LEP Plan**

- **How often should the plan be evaluated?**

✓ **Quarterly**

- **How often should the plan be updated?**

✓ **Annually**



<http://www.lep.gov>

**Meaningful Access  
for People who are  
Limited English Proficient**

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