

WHA's Limited English Proficiency (LEP) Policy

1. Policy

a. The WHA will take all reasonable steps to ensure that all limited English speakers have equal and meaningful access to WHA services and programs. This policy is in accordance HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Person. The WHA General Counsel shall serve as the Language Access Coordinator (LAC) and will annually assess the needs of the WHA's individual department for translation and/ or interpretation services. All recommendations and/or modifications shall be recommended to the Executive Director by the LAC.

2. Applicability

a. The LEP policy applies only to departments that provide direct service to WHA residents, participants in rental assistance programs and/or applicants do those programs. The WHA will annually review all applicable documents and assess whether or not document is vital and required translation.

3. Four Factor Analysis of Language Services

- a. Determine percentage of LEP persons eligible to be served based on the population;
- b. Each department shall track and record requests for language assistance and/or translation services;
- c. Determine nature and importance of program, activity or interaction with LEP person;
- d. Determine available and future resources and associated costs in proving such services to LEP persons;
 - Qualified WHA employees may be used to provide language assistance services where needed;
 - Determine if open positions would be better served a bilingual employee.

4. Providing Language Assistance Services

a. Interpretative Services (Oral):

- Each WHA department that provides direct services must provide oral interpretation upon request at no charge to LEP person to ensure meaningful access to WHA direct services. WHA shall notify all applicants, residents and/or participants of their right to request an interpreter for hearing, interviews, scheduled appointments and adverse action.

- The WHA will not require LEP persons to bring their own interpreter, but will allow an LEP person to have an adult family member or friend over the age of 18 to provide translation services if they wish. However, in situations where the use of family members is not appropriate, such as domestic abuse and sexual assault, an interpreter will be provided.

b. Translation Services (Written Language)

- Documents which contain vital information or information that is critical for ensuring meaningful access to the WHA's direct services are considered Vital Documents. Each department director shall conduct a review of its written documents for the purpose of assessing whether any document contains vital information and requires translation.
- The WHA shall translate vital documents in the appropriate languages and maintain those documents for distribution. This commitment is subject to the availability of funds. The WHA will rely upon and HUD and DHCD to translate their own requires documents. Documents containing individualized facts that would be impractical to translate because of the numerosity and associated costs and time involved will not be translated (i.e. conference notices, denial letters, hearing decision etc.)

5. Outreach

- a. The WHA will post notices of the availability of translation services in offices where LEP persons interact with the WHA. Such notices will also be contained on the WHA's website.

6. Training and Monitoring

- a. The WHA will provide training and assistant to appropriate staff regarding the LEP policy and language assistance services.
- b. The LAC will monitor the WHA's language assistance services to LEP persons on an ongoing basis and review the documents translation list to ensure proper updating on a semi-annual basis.

7. Complaints

- a. WHA employees who receive a report or become aware that a LEP person believes they should have been provided with language assistance services with the LEP policy should report that information to the LAC and the Office of Civil Rights at 617-988-4383.