



Housing Authority  
1115 Seminary Street  
PO Box 660  
Napa, CA 94559

## LANGUAGE ASSISTANCE PLAN

### BACKGROUND AND INTRODUCTION

#### Policy Statement

It is the policy of the Housing Authority to ensure meaningful access by Limited English Proficient (LEP) Persons to critical services while not imposing undue burdens on the Housing Authority. In cases of inquiry, application and utilization of Housing Authority programs and services, the Housing Authority will offer, or ensure that the LEP person is offered through other sources, competent translation services free of charge. If LEP persons choose, they will be permitted to use, at their own expense, an interpreter of their own selection, in place of or as a supplement to the language services offered by the Housing Authority. The interpreter may be a family member or friend.

#### Four Factor Analysis

The Housing Authority has conducted the four factor analysis required by the January 22, 2007 Federal Register notice of guidance regarding "Limited English Proficient Persons." These regulations require an analysis of the following four factors before determining the best way to meet the needs of persons with limited English proficiency:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service;
4. The resources available and costs to provide LEP services

In addition, the regulations establish "safe harbor" limits as follows:

1. If LEP persons make up 5%, or 1000, whichever is less, of the population of persons eligible to be served or likely to be affected, the HUD recipient should provide written translation of vital documents.
2. If there are fewer than 50 persons in a language group, but those 50 people do reach the 5% trigger, the HUD recipient should provide written notice of the availability of translation services.

## Count of non-English speakers in the City of Napa

The most recent LEP data for the City of Napa is from the 2000 Federal Census. Table DP-2, Profile of Selected Social Characteristics: 2000, is shown on the following chart:

LANGUAGE SPOKEN AT HOME	NUMBER	PERCENT
Population 5 years and older	67,831	100.0
English only	50,157	73.9
Language other than English	17,674	26.1
Speak English less than "very well"	10,175	15.0
Spanish	14,716	21.7
Speak English less than "very well"	9,210	13.6
Other Indo-European languages	1,789	2.6
Speak English less than "very well"	492	.7
Asian and Pacific Island languages	991	1.5
Speak English less than "very well"	451	.7

In reviewing these statistics, it is important to note that the figures include all persons 5 years of age and older. This group would be significantly larger than the persons needing information to access the services provided through affordable housing programs and CDBG programs. In the case of children receiving services, it would be their parents or guardians who would need information regarding the program or services. In addition, these figures include persons of all income levels, not just those who are eligible for housing assistance and/or CDBG program services.

However, given that the 2000 Census data indicate that 13.6 % of the Spanish-speaking population spoke English less than "very well," it is safe to assume that the Spanish speaking population meets the "safe harbor" limits as described in the Federal Notice of guidance on LEP. There are no other language groups that meet the "safe harbor" limits of the first factor of a minimum of either 5% of the population or 1000 speakers, whichever is less. In addition, there are no other language groups that meet the "safe harbor" limits of the second factor of a group of fewer than 50 persons who make up at least 5% of the population.

The Housing Authority maintains a file on Census information and continues to monitor changes in the population that might indicate the need to provide translation services to other LEP language groups.

### LANGUAGE ASSISTANCE SERVICES

The computerized system for Housing Authority has the capability to enter information that individual clients speak a primary language other than English. This information is available to the case worker when she/he is accessing the client's file. The system can also retrieve data on the number of persons served by the Housing Authority who speak a primary language other than English. For example, an inquiry to the system as this plan

was being written indicated that 297 persons had a primary language in Spanish, two persons a primary language in Korean, one person in Mandarin, one person in Vietnamese and one person in Arabic. A language card is maintained in the reception area for LEP persons to self identify the language they speak if they are not proficient in English.

#### Current Status of Translation Services Provided in Spanish

Spanish speaking persons requesting services from the Housing Authority are advised that translation services are available free of charge. The main telephone number to the Housing Authority has a message that provides the caller the option of selecting a number to communicate in Spanish. The telephone system tracks the number of persons selecting the Spanish option. From November 1, 2008 through January 25, 2009, a total of 171 persons chose the Spanish option when calling the Housing Authority main telephone line.

The receptionist for the Housing Authority is bilingual in English and Spanish. Three out of the 3.5 case workers who serve Section 8 clients are also bilingual in English and Spanish. Section 8 clients whose primary language is Spanish are assigned to Spanish speaking case workers.

The Housing Authority has identified vital documents to be translated into Spanish. Following is a list of documents currently provided in both English and Spanish:

#### Housing Rental Assistance Documents:

- Section 8 Rental Assistance Waiting List Questionnaire
- Section 8 Rental Assistance Application
- Request for Lease Approval (HUD-52517)
- Voucher (HUD-52646)
- Personal Declaration Form
- Tenant Information Change Form
- Portability Notice
- Contract (HUD 52647.1) Parts A, B & C
- Contract, Part A Subsidized Unit (HUD-52535.4)
- Authorization with Privacy Act (HUD-9886)
- Amendment
- Certification with Privacy Act
- Citizenship Declaration
- Lead Based Paint Disclosure
- Rent Reasonableness Survey
- Non-Wage Income Verification Form
- Medical Allowance Verification Form
- Earned Income Verification Form
- Child Care Allowance Form
- Asset Verification Form

Housing Rental Assistance Documents continued:

Interim Re-examination Appointment Letter  
New Admission Appointment Letter  
Annual Re-examination Appointment Letter  
Final Re-examination Appointment Letter  
Subsidized Housing Resource List  
Explanation of Process to Move under Section 8 Program  
Reimbursement Letter to Tenant  
Zero Income Housing Assistance Program Letter  
Tenant Signature Cover Letter  
Tenant Transmittal Letter  
Owner Signature Letter  
Owner Transmittal Letter  
Out of County Waiting List Letter  
Waiting List Receipt Notice  
Criminal Records Check Consent Form  
Public Notice Signs in Lobby  
Fair Housing Notices  
Outreach Brochure on Section 8 Housing Choice Voucher Program

Current Status of Translation Services in Languages Other than Spanish

As indicated previously, there are no other language groups that reach the safe harbor limits at this time. A language card is maintained in the reception area and interview rooms for LEP persons to self identify the language they speak if they are not proficient in English. The card also indicates that translation services are available free of charge.

In preparation for the possibility that a LEP person whose primary language is other than Spanish requests services, the Housing Authority has contracted with a firm that provides telephone translation services in over 170 different languages. The translation service will be utilized as needed. The firm also provides document translation if needed. Housing Authority staff has received written instructions on how to utilize the service.

To further improve the Housing Authority's language assistance program over the coming year, the Housing Authority has adopted the following goals:

GOALS

1. By June 24, 2009 develop a brochure advising persons of the Housing Authority's Language Assistance Plan. This brochure will be available in English and Spanish. A copy of the brochure in English will be given to existing employees and new employees.
2. By June 30, 2009 post the brochure in the Housing Authority lobby, and provide it to all persons requesting a Waiting List Questionnaire. If they request the

Waiting List Questionnaire in Spanish, provide the Spanish version of the brochure. Also include it in the packet that goes to all persons receiving letter advising them that their name has been reached on the Waiting List, and application packets for other Housing Division Services.

3. By June 30, 2009 revise the Waiting List Questionnaire to include a question asking the person completing the form to identify their primary language and whether they wish to request translation services. The Questionnaire will be retained in the client's file.
4. By June 30, 2009 conduct a training meeting with all Housing Authority staff to review the Language Assistance Plan and procedures to follow in assisting persons with limited English Proficiency.
5. By June 12, 2009 update the Housing Authority's page on the City of Napa's website to include information on the availability of translation services. This statement should be in English and Spanish. Include instructions on how to utilize the automatic translation service at the bottom of the web page.
6. Annually review the Language Assistance Plan to determine whether any changes are needed due to changes in demographics, changes in programs and development of new brochures or forms, number of phone calls received on the Spanish line, changes in numbers of clients speaking a primary language other than Spanish and number of requests for translation services other than Spanish.

## ANNUAL REVIEW

The Language Assistance Plan will be reviewed annually in conjunction with the Annual Plan review. Next year's annual review will include a report on accomplishments in meeting the previously described goals to improve language assistance.