



San Francisco Housing Authority Procedure: Limited English Proficiency Plan Procedures

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1.0 Effective January 1, 2017; Procedure Approval Authority: Executive Office

Overview

The objective of the Limited English Proficiency Plan Procedures (LEP Procedure) is to provide free language assistance for San Francisco Housing Authority (SFHA) clients, including but not exclusive to applicants, recipients, and/or persons eligible for public housing, Section 8/Housing Choice Vouchers, homeownership and other SFHA programs. The function of the LEP Procedure is to ensure that SFHA employees implement the LEP Plan (LEP Plan), so that individuals needing language assistance will have meaningful access to the services, benefits and programs provided by the SFHA. SFHA Employees must adhere to the LEP Procedure.

2.0 Areas of responsibility

2.1 Scope of Each Department’s Responsibilities Under the LEP Plan

Department	Responsibilities Under LEP Plan (list is not exhaustive)
Front Desk/ Reception at 1815 Egbert	Welcome LEP clients to SFHA main office; determine if clients need LEP services, including oral interpretation and written translation; determine if clients need grievance procedure information; provide records of language preferences to managers; Update Elite if active clients identify that they are LEP and not already identified as such
Section 8/Housing Choice Voucher Program	Determine language preferences of existing clients and new admissions; determine whether clients who meet in-person/speak on the phone with department staff need written translations of documents/forms and/or oral interpretation; Determine language services needed by residents affected by relocation; Update LEP preference at annual and/or interim recertification;
Public Housing	Determine language preferences of existing clients and new admissions; determine whether clients who meet in-person/speak on the phone with department staff need written translations of documents/forms and/or oral interpretation; determine language services needed by residents affected by relocation; Update LEP preference at annual and/or interim recertification
Government Affairs and Policy	Review LEP Plan and Procedure compliance with federal regulations, other laws and HUD guidance annually as part of the Annual Plan Process; Provide LEP services as instructed in the Commission Meeting Notice and Agendas; Monitor LEP Plan and Procedure as needed.
Human Resources	Provide new hire training on the LEP Plan and Procedure within six (6) months of hire and every other year.
IT	Assist all departments with tracking data on the frequency and types of languages encountered by SFHA employees in their interactions with clients

3.0 **Procedure details**

3.1 **“How To” Assist an LEP Client In-Person**

3.1.1 *Written Translations: Translation Protocol*

Vital Documents: HUD has defined “vital documents” to be those forms or documents that are critical for ensuring meaningful access, or awareness of rights or services, of federally funded services or benefits. SFHA documents which have been identified as vital documents and translated from English to Chinese, Russian, Spanish, and Vietnamese are listed on the “LEP Vital Documents Chart”.

Unless a translated document has been obtained from HUD resources, all other Vital Documents will be translated by a certified third party consultant.

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. The signed English version of a form is the official, legally binding document. The translated version of a form or document, whether signed or not, is not legally binding. Interpreters will be trained to use the English version of a form as the official signature form. Staff must retain both versions in the file.

Interpreters will be trained to explain to the LEP client that:

- 1) the translated version of the form is an accurate translation of the English version;
- 2) the English version must be signed; and
- 3) the English version is the only legally binding document.

3.1.2 *Oral Interpretations: Interpretation Protocol*

The SFHA will attempt to provide a bilingual staff interpreter to provide free oral interpretation services to an LEP client. If a bilingual staff interpreter is unavailable to provide oral interpretation in the LEP client’s preferred language, the staff member will provide the client with an interpreter through the vendor procured through the SFHA.

If the staff member determines that a delay would not adversely affect the client’s rights to benefits, programs or services offered by the SFHA, or if the interpretation telephone line is unavailable the staff member can explain to the client the following alternatives:

- 1) Client can wait to handle their issue until a formal interpreter who can accommodate the client’s language preferences can be located and scheduled for interpretation services, or
- 2) Client can provide their own informal interpreter (family member, friend, privately hired, private individual, informal interpreter, etc.) and sign a Voluntary Waiver of their right to free interpreter services offered by the SFHA.

3.1.3 Client Sign-In

Step 1: Receptionists stationed at the front desk must ask each individual to sign-in.

Step 2: The receptionist interacting with the individual may determine whether an individual needs language services by the language card and/or sign in used at check in.

The individual may self-identify, by writing on the sign-in sheet language column, that he/she requires oral interpretation and/or written translation of SFHA documents.

If the individual does not self-identify a language preference on the sign-in sheet, the receptionist can direct the individual to specify a language preference by pointing to the LEP Language Chart. If the individual points to a specific language preference on the LEP Language Chart, the receptionist should write-in the language identified on the sign-in sheet.

Step 3: Once the receptionist confirms that the individual requires LEP services, the receptionist should determine what type of LEP services are required by the individual, i.e. oral interpretation and/or written translation. This determination will be dependent on the nature of the individual's visit to the SFHA office. Once the receptionist makes this determination, the receptionist should follow the protocol for LEP Oral Interpretation or LEP Written Translation.

Step 4: If the individual has not already specified that they require oral interpretation, written translation, or both services, the receptionist should write in the language column of the sign-in sheet which LEP services the client has requested and update Elite.

4.0 "How To" Assist an LEP Client During a Telephone Conversation

If an SFHA employee has telephone contact with a client and determines that the client requires language assistance, the SFHA employee must follow the protocol for oral interpretation. See above Oral Interpretation section 3.1.2.

5.0 "How To" Assist an LEP Client with Obtaining Translated Vital Documents

When using specific documents to assist an LEP client, make sure to first check the SFHA website for the document. LEP related documents will be dated on the left or right bottom corner of the document. Where applicable, members of the public will be directed to the website.

6.0 Notice of Rights to Language Assistance

6.1 SFHA Website

The SFHA website currently includes a "Google Translate" toolbar on each webpage of the SFHA website. The toolbar translates the English version of the SFHA website into over 50 different languages, including the languages identified in the LEP Plan.

6.2 Mail Correspondence

All correspondence mailed to SFHA clients will include the updated LEP Information Mailer in all correspondence to all clients unless client has informed the SFHA, in writing, that this mailer is no longer necessary. This will help to ensure that all clients receive notification of the new LEP services offered by SFHA.

The LEP Services Information Mailer will serve to notify potential LEP clients of the language assistance services, including written translation and oral interpretation, offered by the SFHA.

7.0 Client Grievances

All SFHA clients will be notified about the availability of grievance procedures with the Notice of Availability of Grievance Procedures, which will be attached as a cover sheet to the Personal Declaration form.

8.0 LEP Plan and Procedure Training and Distribution to Current SFHA Employees

All regular SFHA employees will be given a copy of the LEP Plan and Procedure at an LEP training to occur every two (2) years and within six (6) months of the hire date.

SFHA employees will be required to attend an LEP training workshop every two (2) years . Each training workshop will be designed to highlight the potential LEP client interactions and issues the group will encounter based on their positions/departments.

The training workshop facilitator will mark an attendance sheet to record which employees received the training.

Any employee who misses a scheduled training due to an absence for the work day will be required to schedule a make-up workshop with the workshop facilitator.

All employees who complete a training workshop will sign and submit the Receipt of LEP Plan and Procedure Signature Page, to document receipt of the most updated Plan and Procedure. The Receipt of LEP Plan and Procedure Signature Page will be stored in the employee's file.

SFHA employees are encouraged to suggest methods of improving the LEP Procedure while participating in the LEP training workshops.

8.1 LEP Plan and Procedure Distribution to New Employees

The Human Resources department will train Human Resources staff members who conduct New Hire Orientation, to distribute and explain the LEP Plan and Procedure to new employees of the SFHA.

New Hire Orientation is administered by a Human Resources staff member on a new employee's first day of employment for the SFHA. New employees will be required to sign and submit the Receipt of LEP Plan and Procedure Signature Page and to document receipt of the Plan and Procedure within six (6) months of regular employment. The Receipt of LEP Plan and Procedure Signature Page will be stored in the employee's file.

9.0 Monitoring LEP Plan and Procedure

9.1 *Data from 1815 Egbert Avenue front desk sign-in sheet*

Step 1: At the end of each work week, the front desk staff must take the data entered onto the sign-in sheets (specifically the data reflecting the frequency of contact with individuals requiring language assistance, and the language preferences indicated) and input the data into a database stored on the SFHA system or scan and electronically store the sign-in sheets in date order.

Step 2: The front desk staff uses the data entered into the database to generate a spreadsheet/report of all the individuals encountered by the front desk staff during that work week.

Step 3: The front desk staff must submit the report or scanned sign-in sheets to the LEP Manager quarterly in March, June, September and December..

Step 4: The LEP managers will maintain the data For three (3) years.

9.2 *Data from current participant files in the ELITE software*

When a staff member handles a new admission or annual re-certification, the staff member will confirm/update the client's language preference into Elite.

10.0 Modifying the LEP Plan and Procedure

The LEP Plan will be reviewed annually as part of the Annual Plan process. Upon approval by the Board of Commissioners of the SFHA of the LEP Plan, the LEP Procedures will be updated as needed and staff will be trained on the changes.

11.0 References

The LEP Plan can be found at <http://SFHA.org/> (About Us, Plans and Policies).

12.0 Appendix

- A. Vital Documents Chart
- B. Sign In Sheet