

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

I. PLAN STATEMENT

City of Roanoke Redevelopment and Housing Authority (RRHA) have adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines RRHA will make reasonable accommodation to provide or arrange free language assistance for its LEP clients, including applicants to Public Housing (PH) and Housing Choice Voucher (HCV) (Section 8) programs, participants in Public Housing and (HCV) programs, homeownership programs, and other RRHA programs.

II. FOUR-FACTOR ANALYSIS

Factor One: The number or proportion of Limited English Proficient (LEP) individuals to be served or likely to be encountered.

1. **Public Housing Program:** The service area of RRHA Public Housing Program is the City of Roanoke, Virginia. As of January 29, 2020, RRHA operates 1,275 public housing units and had 1,160 families who reported a family language participating in the program. The breakdown for the primary languages spoken by these families is as follows:
 - A. English – 1093 families – 94.22%
 - B. Arabic – 14 families – 1.21 %
 - C. Haitian/Creole – 10 families – 0.86%
 - D. Kirundi – 10 families – 0.86%
 - E. Spanish – 10 families – 0.86%
 - F. Kiziguwa – 9 families – 0.77%
 - G. Swahili – 8 families – 0.68%
 - H. Vietnamese – 6 families – 0.51%

2. **Housing Choice Voucher (HCV) (Section 8) Program:** The service area of RRHA HCV Program is City of Roanoke, City of Salem, Town of Vinton, Virginia and surrounding counties such as Franklin, Floyd, Bedford, Botetourt, Alleghany. As of January 29, 2020, RRHA has 1,887 families who reported a family language participating in the program. The breakdown for the primary languages spoken by these families is as follows:
 - A. English – 1867 families – 98.88%
 - B. Arabic – 4 families – .2 %
 - C. Croatian- 1family - .1
 - D. Drdary- 1family- .1
 - E. Haitian/Creole – 3 families - .2
 - F. Pashto- 2 families- .1

- G. Spanish – 7 families - .4%
 - H. Ukrainian- 2 families - .1
3. 2019 Census for the City of Roanoke: 99,920 families. The breakdown for the primary languages spoken in the City of Roanoke:
 - A. English – 39,061 families – 91.20%
 - B. Spanish – 1,633 families– 6.1%
 - C. Other Indo-European Languages – 592 families – 1.39%
 - D. Asian and Pacific Islander Languages – 614 families – 3.08 %
 - E. Other – 578 families – 1.90%
 4. Based on the 2010 – 2019 American Community Survey 5-Year estimates for the City of Roanoke, 91,127 of the 99,920 (91.20%) residents over the age of 5 speak English only at home. For the remaining 8,793 (8.8%) residents who speak a language other than English at home, 4,079 do not speak English “very well”. This equates to 4.5% of the total number of residents over 5 years old in the City. The largest language group within the City that does not speak English “very well” is the group that speaks Spanish or Spanish Creole at home, 3,957 residents, which comprise 4.4% of the City residents over the age of 5.

Factor Two: The frequency with which LEP individuals come into contact with the program.

In addition to undertaking research required to identify LEP in RRHA’s area of operations, RRHA shall also compile information regarding the frequency of contact with LEP persons during the process of providing housing services. The more frequent the contact with a particular language group the more likely the need for enhanced language services in that language.

The minimum frequency of contact for the total 3,048 households (combined PH and HCV programs) includes initial application, voucher briefing, yearly annual re-exam and yearly annual inspection. Some participants may have one or more additional re-exams (interim re-exams) to report changes in income or family composition. Public housing residents may need to request maintenance through the work order system. In addition, some families receive emergency inspections for health and safety or life-threatening conditions in their housing unit that occur prior to the annual inspection. Some applicants/participants may have informal reviews, informal hearings, may attend a movers briefing, or may have various questions regarding the program throughout the year.

It is estimated that 275 applications for housing assistance through the PH program are received monthly, when the PH waitlists are open and the RRHA is accepting applications, for an annual average of 3,300 applications. The last time when the waitlist for the HCV program was opened for receipt of applications was in February of 2019. At that time 2,657 applications were received. As of January 29, 2020, approximately 2,500 applicants remain

on the waitlist for the HCV program.

Factor Three: The nature and importance of the program, activity, or service provided by the program.

RRHA's mission is to have a leadership role in providing safe, quality, affordable housing for individuals and families of City of Roanoke and the surrounding counties in its service area. Housing is a basic human need, the lack of which can have serious or life-threatening implications for any individual. Therefore, RRHA takes its responsibility as a provider of affordable housing very seriously.

In order to provide full access to the affordable housing programs that it provides, RRHA recognizes the potential for LEP to limit access for individuals and families to those programs. It is RRHA's intent to provide the resources needed to give meaningful access to those programs for all applicants and participants. Therefore, when required, RRHA is committed to providing competent language services with the understanding that some services and documentation related to those services are more vital than others.

Factor Four: The resources available and costs to the recipient.

Due to limited resources, RRHA shall use the most cost effective means for providing competent language services for the individuals and families for which housing services are provided. In the process of determining which services are required or to be provided, RRHA shall thoroughly document the steps taken in arriving at that determination.

III. LANGUAGE ACCESS PLAN (LAP)

Purpose:

The purpose of RRHA's LAP is to ensure that all individuals and families (potential applicants, applicants, and participants), regardless of the primary language spoken, have meaningful access to affordable housing services RRHA provides.

Identification of LEP persons:

After completion of the four-factor analysis with consideration given to HUD's "safe harbor" guidance, it is determined that there are currently no non-English language groups of sufficient percentage or number that require translation of written documents.

Identification of the points and types of contact the agency and staff may have with LEP persons:

The minimum frequency of contact for the total 3,048 households (combined PH and HCV programs) includes initial application, voucher briefing, yearly annual re-exam and yearly annual inspection. Some participants may have one or more additional re-exams (interim re-exams) to report changes in income or family composition. Public housing residents may need to request maintenance through the work order system. In addition, some families receive emergency inspections for health and safety or life-threatening conditions in their

housing unit that occur prior to the annual inspection. Some applicants/participants may have informal reviews, informal hearings, may attend a movers briefing, or may have various questions regarding the program throughout the year.

It is estimated that an average of 3,300 applications are received per year for the PH program. Applications are received at RRHA's Central Administration Offices by the receptionist and at each public housing development rental office. In the City of Roanoke, 8.8% of the population does not speak English very well. Therefore, it is estimated on an annual basis that 231 applicants for PH assistance do not speak English very well. Of the 1,897 applications received in 2019 for HCV program assistance, it is estimated that 167 were submitted by applicants who do not speak English well.

In addition, there exists a continual opportunity for LEP persons to contact staff at any of RRHA's properties with questions regarding services provided by RRHA's affordable housing programs.

Identification of ways in which language assistance will be provided:

Currently RRHA provides language assistance through "I Speak" cards which are available at each public housing rental office "Language Line" and "VOLATIA" interpretive services which can be accessed via telephone at each public housing rental office. Also, HCV program staff has access to "I Speak" cards, "Language Line" and "Volatia" services. The administrative staff at RRHA's Central Administration Office, which has the potential for direct interaction with LEP persons, has access to "I Speak" cards, "Language Line" and "Volatia" services. RRHA currently has multiple contracts with a firm which provides competent translation services for written documents if required and onsite interpreter services if need.

Effective outreach to LEP community:

RRHA's LAP Plan will be made available to the public via RRHA's web page by March 2020.

Staff training:

All of RRHA staff for PH (including PH maintenance staff) and HCV programs, which have potential for direct interaction with LEP persons, received Fair Housing Training in May 2018 by the Housing Development Law Institute. This training will be repeated in mid-2020 by HDLI. Site management staff and HCV staff have been trained in use of "I Speak" cards, "Language Line" and "Volatia" services. Administrative staff at RRHA's Central Administration Office shall receive training regarding accessing and use of "I Speak" cards, "Language Line" and "Volatia" services.

Determination of vital documents and informational materials:

At a minimum the following documents are considered "vital": Consent and compliant forms; Intake forms with the potential for important consequences; Written notices of rights,

denial, loss, or decreases in benefits or services, and other hearings; Notices of eviction; Notices advising LEP persons of free language assistance; Notices of public hearings; Leases and tenant rules; applications for participation in PH or HCV programs; and on a case-by-case basis any other document that is determined to be important for LEP person to have access to a particular service RRHA provides.

Translation of informational materials in identified language(s) that detail services and activities provided to beneficiaries:

RRHA will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or

If there are fewer than 50 persons in a language group that reaches the 5 percent trigger, RRHA may not translate vital written materials, but will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Due to the high costs equated with the translation of written documents and when translation of written documents is not required by regulation, all requests for translation of written documents will be given consideration only in limited situations where there is an action to be taken that will have severe impact on the person or family making the request. Such actions may include denial of program assistance or termination of program assistance. Consideration of such requests shall be conducted in a reasonable and nondiscriminatory manner. Such requests for translation of written documents shall be reviewed by the Director of the applicable program who will make a recommendation regarding approval or denial of translation of pertinent program documents. The Vice President of Housing and the Executive Director shall review the recommendations made by the Directors.

The person making the request for translation of written documents will be offered competent oral translation of written documents. Requests for oral translation will always be provided free of charge.

Provision of appropriately translated notices to LEP persons:

When determined to be necessary to provide meaningful access for LEP clients, RRHA 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 RRHA will undertake this examination when an eligible LEP group constitutes 5 percent of an eligible client group (for example, 5 percent of households living in the PHA's public housing) or 1,000 persons, whichever is less.

Provision of interpreters for large, medium, small, and one-on-one meetings:

When determined to be necessary to provide meaningful access for LEP clients, the PHA will provide qualified interpreters, including PHA bilingual staff and contract vendors. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.

Development of community resources, partnerships, and other relationships to help with provision of language services;

RRHA will apply effort in seeking community and outside resources to help provide language services. RRHA will consult with other Housing Authorities regarding services for LEP persons.

Provision for monitoring and updating the LAP:

Monitoring and implementation of the plan will be executed daily on a case-by-case basis by Vice President of Housing, Manager of the HCV Program, public housing Site Managers and HCV Specialists. The Four-Factor Analysis and the LAP shall be reviewed and updated on a yearly basis by Vice President of Housing, and the Manager of the HCV Program. Complaints and comments received regarding LAP services shall be forwarded to the Vice President of Housing or the Manager of the HCV Program depending on the participant's program involvement.

The following sources of information will be incorporated in the yearly review:

1. Reports from the RRHA's computer business systems on the number of RRHA clients who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations.
2. Reports from the computer business systems and other sources listing the languages used by LEP clients.
3. A determination as to whether 5 percent or 1,000 persons from a RRHA client group speak a specific language, which triggers consideration of document translation needs as described above.
4. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.