

Housing Authority of the City of Linden

Language Access Plan

Adopted: May 2, 2024

Resolution: 2024-5-6

Introduction

Language can be a barrier to accessing important benefits or services, understanding and exercising important rights, and complying with applicable responsibilities. Executive Order 13166, issued August 11, 2000, requires recipients of Federal financial assistance to take reasonable steps to ensure meaningful access to their programs and services by effectively communicating with Limited English Proficiency (“LEP”) persons. Those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered LEP persons.

On January 22, 2007, the U.S. Department of Housing and Urban Development (“HUD”) issued Final Guidance to recipients of HUD funding concerning compliance with the Title VI prohibition against national origin discrimination affecting LEP persons. HUD’s Final Guidance defines a four-factor self-assessment method which assists agencies receiving HUD funds in determining the extent of their obligations to provide LEP services. The Housing Authority of the City of Linden (“HACL”) is a recipient of Federal HUD funds for its programs. Specifically, the HACL provides housing assistance to low- and moderate-income persons, including LEP persons, through its Public Housing and Section 8 Housing Choice Voucher programs.

Policy Statement

It is the HACL’s policy to provide language access services to LEP persons needing access to Federally-funded housing programs, to inform LEP persons that language access services are available, and to continuously monitor and evaluate the implementation of this plan.

Four-Factor Analysis: Identifying LEP individuals needing language assistance

Factor 1: Number or Proportion of LEP persons in the eligible service area

According to the 2022 American Community Survey (Table S1602), approximately 1,415 of the 15,219 households (9.3%) in the County of Union have Limited English Proficiency. Of these LEP households, approximately 671 speak Spanish, 702 speak other Indo-European languages, 3 speak Asian or Pacific Island languages, and 39 speak other languages.

Additionally, approximately 26,639 of the 202,575 households (13.2%) in the County of Union have Limited English Proficiency. Of these LEP households, approximately 18,935 speak Spanish, 6,253 speak other Indo-European languages, 905 speak Asian or Pacific Island languages, and 546 speak other languages.

The HACL has encountered applicants and residents who appear to be LEP persons. Predominantly, these individuals speak Spanish.

Factor 2: Frequency with which LEP persons come in contact with the programs

LEP persons come in contact with the HACL’s programs with moderate frequency. The vast majority of interactions occur during the application process leading up to participation in the

HACL's programs. Ongoing interactions include periodic contacts related to continuing program eligibility and maintenance service requests.

Factor 3: The nature and importance of the programs

The programs offered by the HACL are of critical importance; the HACL provides decent, safe, and affordable housing to families, seniors, and disabled persons in the greatest need.

Factor 4: The resources available to HACL and overall costs to provide LEP assistance

The HACL is a public agency with limited funding. Thus, the HACL has limited resources to provide LEP assistance.

Language Assistance Measures

The HACL will make use of the following resources to facilitate effective communication so that LEP persons can gain meaningful access to the HACL's programs and services.

"I Speak" Cards

In order to further identify LEP persons seeking access to housing programs, the HACL will use "I Speak" cards when engaging in direct contact with applicants and residents. The file of the applicant/resident will thereafter be marked to indicate their preferred language.

Interpretative Services (Oral Language)

For all known LEP persons, the HACL shall secure and provide qualified interpretative services during all critical encounters (including but not limited to application interviews, application meetings, applicant hearings, lease signings, lease terminations meetings and hearings, and Housing Choice Voucher termination hearings; but not for court proceedings, as the New Jersey Superior Court has their own interpretative services) and upon request. There shall be no charge to the LEP persons for these services.

Where deemed appropriate by the HACL, LEP persons may be permitted to use, at their own expense, an informal interpreter of their own choosing in place of or as a supplement to the free language services expressly offered by the HACL. The use of an informal interpreter may be prohibited where the interpreter is under 18 years of age, in situations involving domestic abuse or sexual assault, in situations where access to important housing benefits and services are at stake, and in other appropriate circumstances.

Translation Services (Written Language)

For known LEP persons, the HACL may provide translations of vital documents (including but not limited to Program Applications, Application Denials, Lease Agreements, Recertification Applications/Forms, Notices to Cease, Notices of Termination of the Lease, Notices to Quit, and Demands for Possession) and of additional HACL documents upon request.

Non-personalized documents may be translated into languages other than English and maintained for future use to develop a database of translated documents.

Notification of Language Assistance Measures

The HACL shall notify LEP persons of the available language assistance measures through appropriate signage in common areas and offices. The signs shall be provided in the languages identified by LEP persons through the use of the “I Speak” cards.

Distribution of Language Access Plan

The Language Access Plan and “I Speak” cards will be distributed to all HACL staff.

Staff Training and Coordination

The HACL will provide training to all staff on LEP awareness, language identification, required assistance actions under the Language Access Plan, access to language services, working with an interpreter, and documenting language needs.

Staff members should confer with the HACL’s Executive Director, or his/her designee, to determine how to respond to communications from LEP persons and how to secure qualified interpreter and/or translator services.

Monitoring, Evaluating, and Updating the Language Access Plan

As part of its monitoring and evaluation effort, the HACL will review language access needs, LEP training, and outreach activities to periodically update the Language Access Plan. This Plan is a living document that, through monitoring and evaluation, can be updated as the needs of the LEP population and the demands on the HACL to serve this population evolve.

Language Access Complaint Procedure

If you believe you have been denied the benefits of the Language Access Plan, you may file a complaint with the HACL’s Executive Director.