



# Housing Authority of the City and County of San Francisco

## Limited English Proficiency Plan

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### **1.0 Date of Implementation; Approval Authority; Policy Number**

Policy Number 3: Approved July 14, 2025; Effective October 1, 2025

Policy Number 2: Approved October 28, 2016; Effective January 1, 2017

Policy Number 1: Effective May 24, 2010

### **2.0 Purpose of the Policy & Plan Statement**

The Housing Authority of the City and County of San Francisco (Authority) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). It is the official policy of the Housing Authority of the City and County of San Francisco to comply with the letter and spirit of Title VI of the Civil Rights Act to provide access to the Authority's programs by persons who are Limited English Proficient, using whatever means necessary and reasonable. In accordance with Federal guidelines, the Authority will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8/Housing Choice Vouchers, homeownership and other Authority programs.

### **3.0 Detailed Policy Statement**

#### **3.1 Meaningful Access: Four Factor Analysis**

Meaningful access is free language assistance in accordance with Federal guidelines. No less than every five (5) years, the Authority will assess and update the following four-factor analysis, including but not limited to:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the Authority;
- 2) The frequency persons using a particular language come into contact with the Authority;

- 3) The nature and importance of the Authority program, activity or service to the person's life;
- 4) The Authority's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

**3.1.1 Factor One**

The Authority's language preference data compiled by reports generated from the Authority's ELITE software client file computer system produced the following statistics on clients we currently serve:

<b>Language</b>	<b>Total</b>	<b>Percentage</b>
Chinese	10,911	22%
Spanish	2,256	5%

Vital document translation will be required for all languages representing five (5) percent of the Authority's clientele.

**3.1.2 Factor Two**

*The frequency with which LEP persons using a particular language encounters the Authority.*

This determination will be made by analyzing the data in our ELITE software system to project the anticipated number of contact points a client may have with the Authority. The Authority will also retain copies of sign-in sheets for reference and analysis as well on an as needed basis.

**3.1.3 Factor Three**

*The nature and importance of the Authority program, activity or service to the person's life.*

The Authority adheres to the philosophy that housing is essential and extremely important. Thus, when a staff member engages a client in a discussion involving the client's rights to benefits, programs or services offered by the Authority, the staff member must determine whether failure to provide language assistance would result in a substantial delay that would adversely affect the client's rights.

### **3.1.4 Factor Four**

*The Authority's resources and the cost of providing meaningful access.*

The Authority will utilize a combination of procured vendors and the Authority's verified multilingual staff members as professional, competent translators and interpreters. The Authority will procure qualified vendors to provide written translations of vital documents, as well as oral interpretation for languages not spoken by Authority staff members.

Additionally, the Authority will establish partnerships with City departments/agencies and community organizations to provide volunteer interpreter services for our clients, as available. The Authority will allow clients to waive their right to professional and/or volunteer language services, so that clients may utilize friends or family members (who are not minors) as oral interpreters.

### **3.2 Language Assistance**

A person who does not speak English as their primary language and/or who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient (LEP) person and is therefore entitled to language assistance with respect to Authority programs and activities.

Authority staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. The staff will use the LEP Language Chart to identify the languages spoken/written by the applicants/participants. Staff will also use the Personal Declaration form at every admission and re-certification to update the translation/interpretation services needed for each household.

The Authority will assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients.

The Authority will distinguish between language assistance provided in the form of 1) written translations, and 2) oral interpretations.

#### **3.2.1 Written Translations**

The Authority 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 Authority will

undertake this examination when an eligible LEP group constitutes five percent of an eligible client group.

Based on the Four-Factor analysis, the Authority translates vital documents to Chinese (Traditional) and Spanish. Vital documents are listed in the LEP Plan Procedure.

A client may request oral interpretations of vital documents for languages outside of the five percent translation requirement. Any client may also request oral interpretations of documents not translated.

As opportunities arise, the Authority may work with other housing authorities to share the costs of translating common documents, which may include language groups, which currently do not reach the threshold level in the Authority's client population.

The Authority will require a client to certify that the client understands the document translated with the Translation Certification Document.

The Authority staff member will also explain to the client that any written translations of Authority or HUD forms are not the official/legal version of the form. 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.

### **3.2.2 Oral Interpretations**

The Authority will provide interpreters, including multi-lingual staff and procured vendors in accordance with this plan. Written translation and verbal interpretation services will be provided consistent with the four-factor analysis detailed above and in accordance with the “Vital Document(s) List”.

In cases of Formal/Informal Hearings an Authority staff interpreter may not be a subordinate to the Authority staff member rendering a decision on the client’s hearing.

The Authority will monitor LEP in accordance with the LEP Procedures.

After the Authority has offered free interpretation services, an LEP client may prefer to use an informal interpreter, such as a friend or family member (who is not a minor), and the informal interpreter may interpret. In these cases, the client and interpreter of choice will sign a waiver of free interpreter services.

#### **4.0 *Applicability***

This policy applies to all regular management and staff of the Authority. Failure to comply with this policy can result in disciplinary action up to termination of employment. Authority staff will receive training on the LEP Policy every two (2) years and within six (6) months of hire.

#### **5.0 *Implementation Procedures***

The implementation procedures for this Plan are attached herein.