

ST. LOUIS HOUSING

LANGUAGE ACCESS PLAN

Hai

Introduction

The St. Louis Housing Authority (SLHA) administers a variety of housing programs impacting approximately 24,000 residents of diverse backgrounds across the St. Louis Metropolitan Area. SLHA is committed to ensuring equal access to these programs, services and activities for all applicants, residents, and program participants, including those with Limited English Proficiency (LEP).¹

SLHA issues this Language Access Plan (LAP) to ensure individuals with LEP have appropriate access to its programs and services. Specifically, this plan outlines actions SLHA will take to ensure compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, which requires recipients of federal financial assistance take reasonable actions to ensure meaningful access for individuals with LEP.

Policy

It is SLHA's policy to take reasonable steps to ensure persons with LEP can effectively participate in and benefit from SLHA programs and activities in compliance with the United States Department of Housing and Urban Development (HUD) notice entitled "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons," published on January 22, 2007, at 72 Federal Register 2732.

SLHA will provide language access services to all applicants, residents, and program participants with LEP; manage and train SLHA staff on LAP implementation procedures; inform individuals with LEP of available language access services; and continuously monitor and evaluate the implementation of this plan. SLHA will review and update its LEP four-factor analysis at least every three-years and will revise this LAP as needed.

Purpose

SLHA believes equitable language processes are essential to providing high quality services and has prepared this LAP to be used by SLHA staff. The goals of the plan include the following:

- To ensure access to all LEP persons who may come in contact with the SLHA's Programs/Services/Activities;
- To ensure SLHA staff are aware of available language assistance services and how to access appropriate services to meet the needs of our LEP population;
- To ensure all LEP persons who come into contact with SLHA are made aware of SLHA's obligation to provide free interpretation services to facilitate their

¹ SLHA defines persons with LEP as those individuals who have a limited ability to read, write, speak, or understand English and who may require language assistance with respect to a particular type of service, benefit, or encounter.

participation in SLHA programs/activities/services;

- To provide periodic review and update of this LAP in accordance with the needs of the SLHA community; and
- To provide written translations of vital documents to LEP persons in accordance with HUD "safe harbors" guidelines.

Four-Factor Analysis: Identifying LEP Individuals Needing Language Assistance

In accordance with federal requirements, SLHA was required to conduct an assessment, that considers the following four factors to prepare this LAP:

- 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 in contact with the program;
- 3. The nature and importance of the program, activity, or service provided by the program; and
- 4. The resources available to the grantee/recipient and costs.

A review of SLHA's four-factor analysis is included below.

I. LEP Service-Eligible Population

Data used to estimate the proportion of LEP persons in the City of St. Louis is derived from the United States Census Bureau. There are approximately 284,339 St. Louis City residents over the age of 5.² Approximately 9.5% of city residents speak a language other than English at home, and of that population 3.4% report speaking English less than very well.³ The predominant language groups are as follows:

- Spanish: 6,836 individuals or 2.4% of the total population;
- Indo-European: 6,724 individuals or 2.4% of the total population; and
- Asian and Pacific Islander: 5,236 individuals or 1.8% of the total population.⁴

Whereas SLHA occasionally serves residents of St. Louis County, an analysis of St. Louis County LEP population was also performed. There are approximately 943,729 residents over the age of 5 in St. Louis County.⁵ Similar to St. Louis City demographics, approximately 9.5% of county residents speak a language other than English at home, and of that population 3% report speaking English less than very well.⁶ The predominant

⁶ Id.

² American Community Survey, ACS 5-Year Estimates Data Profiles,

https://data.census.gov/table?tid=ACSDP5Y2021.DP02&g=160XX00US2965000_040XX00US29&hidePreview=true ³ Id.

⁴ Id.

⁵ American Community Survey, ACS 5-Year Estimates Data Profiles,

https://data.census.gov/table?g=040XX00US29_050XX00US29189&tid=ACSST5Y2021.S0101

language groups are Spanish (2% or 19,001), Indo-European (3.6% or 34,193), and Asian and Pacific Islander (2.8% or 26,905).

The Census Bureau's American Community Survey (ACS) 5-year data profile (2015-2020)¹– Table "B16004: Age by Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over" indicates an overwhelming majority of survey respondents who speak a language other than English at home report speaking English "well" or "very well."⁷

II. Contact Frequency

SLHA's housing programs address the long-term, affordable housing needs of St. Louis City residents by providing assistance to homeowners, tenants, landlords, and applicants. Contact between SLHA and LEP persons may occur in a number of ways, including but not limited to:

- In-person;
- Telephone;
- Writing;
- Community Outreach and Engagement Events;
- Public Notices;
- Public Hearings;
- Marketing Materials;
- Agency Website; and
- Social Media Profiles.

III. Nature and Importance of Program Services

The more important the activity, information, service, or program, the greater the possible consequences of the contact to the persons with LEP (and the more likely the language services may be needed). Those programs that provide a means of helping individuals obtain housing are critically important to LEP individuals. There is an urgent need to expand the supply of affordable housing, to stimulate economic activity, and to replace lost or damaged housing stock. The importance of federally funded housing programs for homeowners, landlords, and renters, including individuals with LEP, has been demonstrated by the response to already active programs and the waiting lists that have developed. LEP outreach will focus on the programs that provide critical services to renters, homeowners, and landlords.

⁷ American Community Survey, ACS 5-Year Estimates Selected Population Detailed Tables,

 $https://data.census.gov/table?q=Language+Spoken+at+Home+by+Ability+to+Speak+English+for+the+Population+5+Years+and+Older.\&g=160XX00US2965000_040XX00US29\&tid=ACSDT5YSPT2015.B16004$

IV. Available Resources and Costs

This LAP balances the needs of the LEP community with available funding resources. SLHA will take all reasonable steps to provide individuals with LEP with meaningful access to housing programs and activities. SLHA will also leverage existing resources to the greatest extent possible, including language line contracts and partnerships with community organizations that offer interpretive services. The availability of resources, however, may limit the provision of language services in some instances.

SLHA's language assistance services are request driven, in which individuals with LEP seeking information about programs and services may contact SLHA personnel to request interpretation and/or translation services.

Language Assistance Measures

In accordance with federal guidance, and in accordance with Executive Order 13166, SLHA has adopted the following measures to ensure effective communication at all points of contact between a person with LEP and SLHA.

I. "I Speak" Cards

In order to help identify individuals with LEP and determine appropriate language assistance needs, SLHA will provide "I Speak" Cards at its administrative office and developments. Applicants, residents, and program participants may use these cards to indicate their primary language and an SLHA staff member (or in some instances staff from SLHA's third-party property management company) will secure appropriate language assistance services. Training on the use of "I Speak" Cards will be provided to SLHA and third-party management staff upon hire and periodically as needed. Sample "I Speak" cards are included in Appendix 1.

If an individual with LEP is unable to make use of "I Speak" Cards because of reading limitations or disability, SLHA staff will make reasonable efforts to ascertain interpretation needs and provide language assistance services in an alternative manner.

II. Provision of Language Access Services

For oral encounters, SLHA staff may use the following measures:

• Oral Interpretation - Staff: Where feasible, bilingual staff will be utilized to

communicate with individuals in their native languages and to assist them in reviewing materials, answering questions, and responding to forms and information requests.

- Oral Interpretation Telephone Support: SLHA will use the services of Language Line Solutions, a professional telephone interpretation service, whenever requested by an individual with LEP and/or when an individual uses an I Speak card to signify that they speak a non-English language and/or when SLHA staff recognizes the person with LEP and his/her need for language services (and a qualified staff person that speaks the appropriate language is unavailable). The toll-free language line is 1-800-752-6096.
- Oral Interpretation Third-Party, In-Person Assistance: When in-person assistance is necessary to ensure meaningful access and SLHA deems other oral interpretative services insufficient, SLHA will provide third-party, in-person interpretation services at no cost to the individual with LEP through local community partners or qualified, third-party, interpretation services. However, in consideration of balancing costs with maximum delivery of program benefits, these services will be offered as a last resort. SLHA will generally strive to rely on the assistance of bilingual staff members or the assistance. If the LEP person does not wish to use the free interpretation services provided by SLHA, the LEP person may provide their own interpreters at their own expense; however, see below regarding use of family and friends as interpreters.
- Oral Interpretation Use of Other Interpreters not provided by SLHA: An LEP individual's request to use their own qualified, trained interpreter will be allowed at the individual's own expense. Use of family members and friends, especially minor children, as interpreters is strongly discouraged. Exceptions may be made where:
 - the contact with the LEP person is of a routine nature;
 - the contact is one that does not involve confidential matters; or
 - the contact does not involve significant or complex matters impacting the applicant or resident's housing status, rent payments, or lease compliance issues; **and**
 - the LEP person signs a release that indicates alternative services were offered and refused. A sample release is attached in Appendix 2.

Staff are advised to be alert to the potential of any conflict of interest or competency issues that may arise from the involvement of family or friends. If staff have questions about the appropriateness of allowing family and friends as interpreters, they will consult the LAP Coordinator for guidance.

At all times, SLHA will prioritize translating vital documents consistent with HUD's "safe harbor" guidelines. HUD Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance. Rather, the "safe harbors" provide a starting point for recipients to consider:

• Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;

• Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;

• Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and

• Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated.

Pursuant to HUD Guidance on LEP and Title VI, use of the "safe harbor" would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing program) is used to determine the need for written translation services, written translations may not be necessary. The table below sets forth "safe harbors" for written translations:

Size of Language Group	Recommended Provision of Written Language Assistance	Application to SLHA	
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents	Applicable for marketing to eligible LEP populations Not applicable based on current SLHA beneficiary data.	
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents	Not applicable based on current demographic data.	

Size of Language Group	Recommended Provision of Written Language Assistance	Application to SLHA	
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.	Not applicable based on current demographic data.	
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.	Applicable based on current SLHA beneficiary data (less than 1,000 beneficiaries within any non-English language group).	

Based on current demographic data, SLHA will provide written language services when marketing to eligible LEP populations within the market area; however, the proportion of LEP persons served through SLHA programming does not warrant written translation of vital documents.

A document will be considered vital if it contains information that is critical for accessing the SLHA's program or activities, or is required by law. Vital documents include, but are not limited to:

- Documents that must be provided by law;
- Complaint, consent, release or waiver forms;
- Application forms;
- Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the LEP person;
- Form or written material related to individual rights;
- Notice of rights, requirements, or responsibilities; and,
- Notices regarding the availability of free language assistance services for LEP individuals.

Vital documents may be made available in other languages upon request as resources permit and will be maintained for future use as needed to develop a database of translated documents. HUD provides a selection of program documents in ten to thirteen languages other than English. The same can be accessed online at <u>HUD Translated Documents</u>. The SLHA LAP Coordinator will ensure staff are able to obtain these documents as needed.

Please note that if an inconsistency arises between an English version and a translated version of any SLHA or HUD document that is required for participation in any program, service and activity, the wording of the English document will prevail. Translated documents are offered as a convenience to assist in understanding individual rights and

obligations. The English language version of any SLHA or HUD document is the official, legal, controlling document.

SLHA reserves the right not to translate a certain document into a particular language if it is determined that the overall cost to the program far outweighs the benefits.

IV. Public Hearings and Notices

Written materials requesting input and participation from the public for any housing-related activity may be translated electronically on SLHA's website or in paper format upon request, as resources permit.

V. Program Website

SLHA maintains a multilingual website that allows the presentation of content in more than one language thereby expanding programmatic access to a variety of users regardless of language preference. All programmatic information and public notices made available online will be translatable on SLHA's website.

The SLHA website will also include the following notice:

If English is not your primary language, you may request language translation services free of charge. For more information, please call (314) 531-4770 and a representative will connect you with an interpreter or arrange for an interpreter to return your call at your convenience.

VI. Providing Notice to LEP Individuals

SLHA will identify and maintain a list of partner organizations at the state and county level that serve LEP communities to assist in outreach efforts for program announcements, application opportunities, and other public information. SLHA will incorporate multi-lingual messages in its outreach documents that are not translated: these standard messages will indicate the availability of language assistance services upon request. SLHA may provide translations of outreach materials in other languages when outreach efforts are targeted towards specific LEP communities.

SLHA's administrative office and website will include posted information about how to obtain language access services as an LEP person.

Any person who feels that SLHA is not in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d), and Executive Order 13166 regulations may file a complaint with the SLHA LAP Coordinator if he/she believes he/she has not been provided with adequate language assistance services. Complaints will be investigated pursuant to SLHA's Grievance procedures. Written complaints may be submitted to the SLHA LAP Coordinator:

SLHA LAP Coordinator St. Louis Housing Authority 3520 Page Blvd. St. Louis, Missouri <u>LAP@slha.org</u> (314) 531-4770

LEP program applicants wishing to appeal eligibility or other programmatic decisions may also contact SLHA's Ombudsman. The Ombudsman will provide an interpreter to assist the applicant with the appeals process. SLHA will leverage the language line service and bilingual staff to provide interpretation services as needed for all appeal processes and all meetings related to program eligibility determinations.

Ombudsman St. Louis Housing Authority 3520 Page Blvd. St. Louis, Missouri (314) 531-4770

If after working with the LAP Coordinator, Ombudsman, or other SLHA designee, an individual with LEP believes SLHA has not taken reasonable steps to ensure meaningful access to language assistive services, that individual may file a complaint with HUD's local Office of FHEO. For contact information of the local HUD office, please visit the HUD website at www.hud.gov or call the housing discrimination toll free hotline at 1-800-669-9777 (voice) or 1-800-877-8339 (TTY).

Training Staff

I. ILEP Awareness and LEP Training

Training on LAP and LEP issues will be developed for all staff who may have direct contact with the public. SLHA will develop a Basic LEP/LAP course to provide an overview of the definition of LEP persons, overview of the legal requirements governing language access, roles and responsibilities of staff, SLHA language access procedures, and the LAP complaints/appeals process. A sample training deck is included in Appendix 3.

SLHA will incorporate LEP awareness and LAP protocol modules in new hire orientation offerings for all new staff who may interact with the public and/or program applicants.

SLHA will provide periodic refresher reviews and/or training on LEP awareness and required assistance actions under this Language Action Plan for employees. Key staff may also participate in the Annual Review of LEP needs. New Employees will be made aware of this Language Action Plan with training for those in key positions.

II. Guidance and Technical Assistance for Partner Agencies

Guidance and technical assistance training in providing language access services will be developed as needed for third-party management staff that frequently interact with the public. This assistance and guidance will cover an overview of the state and federal regulations governing language access and basic LEP/LAP training.

III. Training on LEP and LAP Compliance and Monitoring of Partner Agencies

SLHA will develop training for staff responsible for monitoring third-party management companies and ensuring that its partner agencies have taken reasonable steps to provide meaningful access to LEP persons. This training will cover components of a meaningful language access plan, LAP monitoring, LAP reporting requirements, and the LAP complaints/appeals process. Training will be conducted as needed for new staff or for existing staff taking over monitoring responsibilities.

Monitoring, Evaluating, and Updating the LAP

As part of its monitoring and evaluation effort, SLHA will review best practices, advance training programs, and language access data to periodically update the LAP. This LAP is a living document that, through monitoring and evaluation, may be updated as the needs of the LEP population and the demands on SLHA to serve this population evolve.

Monitoring and evaluation may include, but is not limited to the following:

- Observing the provision of language assistance services through audits or testing;
- Surveying staff on how often they use language assistance services, if they believe there should be changes in the way services are provided or the providers that are used, and if they believe that the language assistance services in place are meeting the needs of the LEP communities in SLHA service area;
- Conducting customer satisfaction surveys of LEP applicants and beneficiaries based on their actual experience of accessing the agency's programs, benefits or services;
- Soliciting feedback from community-based organizations and other stakeholders about

the agency's effectiveness and performance in ensuring meaningful access for LEP individuals;

- Updating community demographics and needs by engaging school districts, faith communities, refugee resettlement agencies, and other local resources;
- Considering new resources including funding, collaborations with other agencies, human resources, and other mechanisms for ensuring improved access for LEP individuals; and
- Monitoring agency response rate to complaints or suggestions by LEP individuals, community members and employees regarding language assistance services provided.

No later than every two years, SLHA will conduct a Four Factor Analysis and update this LAP to ensure relevancy and quality control of language access services.

Appendix 1: "I Speak" Cards

Amharic

እኔ አማረኛ ነው ምናገረው. Arabic أنا أتحدث اللغة العربية Armenian Ես խոսում եմ հայերեն

Α

B Bengali আমী ঝংলা কখা ঝেলতে পারী

Bosnian Ja govorim bosanski

Bulgarian Аз говоря български

Burmese ကျွန်တော်/ကျွန်မ မြန်မာ လို ပြောတတ် ပါတယ်၊

C

Cambodian ខ្ញុំនិយាយភាលាខ្មែរ

Cantonese 我講廣東話 (Traditional)

我讲广东话 (Simplified)

Catalan Parlo català

Croatian Govorim hrvatski

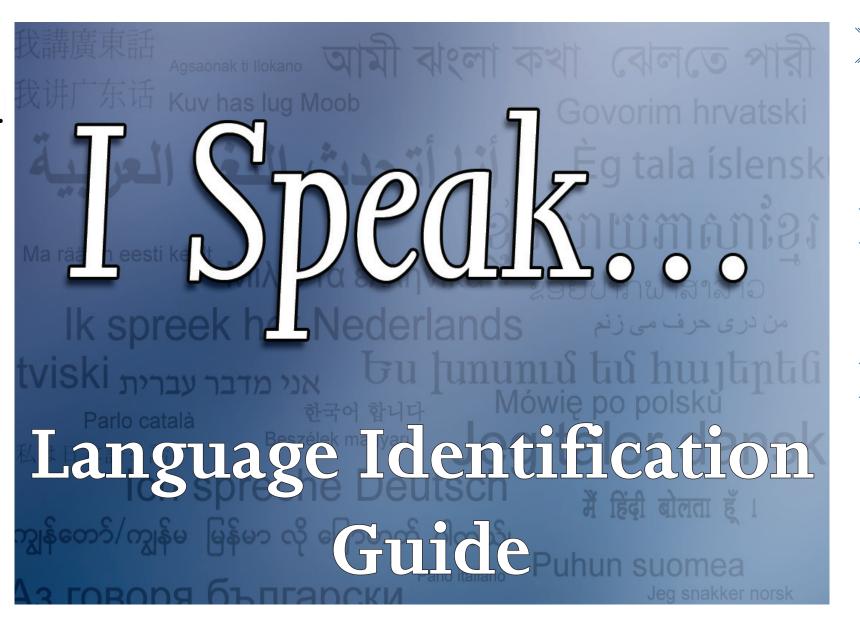
Czech Mluvím **Č**esky

D

F

Danish Jeg taler dansk

Dari من دری حرف می زنم



I

Icelandic Ég tala Íslensku

Ilocano Agsaonak ti Ilokano

Indonesian saya bisa berbahasa Indonesia

Italian Parlo italiano

J

Japanese 私は日本語を話す

K Kackchiquel

Quin chagüic ká chábal ruin rí

Μ

Mam Bán chiyola tuj kíyol mam

Mandarin 我講國語

我讲国语/普通话 (Simplified)

Ν

(Traditional)

Mon

Norwegian

Jeg snakker norsk

•

Q

Qanjobal Ayin tí chí wal q'anjob' al **Quiche** In kinch'aw k'uin ch'e quiche

R

S

Romanian Vorbesc românește Russian Я говорю по-русски

Serbian Ја говорим српски

Sign Language



Slovak Hovorím po slovensky

Slovenian Govorim slovensko

Somali Waxaan ku hadlaa af-Soomaali

Spanish Yo hablo español **Swahili**

Ninaongea Kiswahili

Swedish Jag talar svenska

TagalogMarunong akong mag-TagalogTamilநான் தமிழ் பேசுவேன்

Τ

^{Thai} พูดภาษาไทย

Dutch

Ik spreek het Nederlands

E

Estonian

Ma räägin eesti keelt

Finnish

Puhun suomea

French Je parle français

G

German Ich spreche Deutsch

Greek Μιλώ τα ελληνικά Guiarati હુ ગુજરાતી બોલુ છુ

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Haitian Creole M pale kreyòl ayisyen

Hebrew אני מדבר עברית

Hindi मैं हिंदी बोलता हूँ ।

Hmong Kuv has lug Moob

Hungarian Beszélek magyarul



Korean 한국어 합니다

Kurdish man Kurdii zaanim

Kurmanci man Kurmaanjii zaanim

L Laotian

ຂອຍປາກພາສາລາວ Latvian

Es runâju latviski

Lithuanian

Að kalbu lietuviškai

Executive Order 13166 requires SLHA to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

Persian

من فارسی صحبت می کنم.

Ρ

Polish Mówi**ę** po polsku

Portuguese Eu falo português do Brasil (for Brazil)

Eu falo português de Portugal (for Portugal)

Punjabi ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ। **Turkish** Türkçe konuşurum



Zulu Ngiyasikhuluma isiZulu

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Appendix 2: Release and Waiver of Language Assistance Services

WAIVER OF LANGUAGE ASSISTANCE SERVICES

The Saint Louis Housing Authority is committed to ensuring high quality oral and in-person interpreter services for all limited English proficient individuals. These services are available at no cost.

		was informed	of his/her right	to free interpretive	services and
has declined the same on this _		of		_, 20	
		Day	Month	Year	
Client:					
	Signature				
	Print				
Witness:					
Withess.	Signature				
	Print				

Appendix 3: LAP Training Deck



LANGUAGE ACCESS PLAN

AGENDA

- Background
- Language Assistance Measures
- Language Access Protocols
- Interpretation
- Bilingual vs. Interpreter or Translator
- Document Translation
- Monitoring
- Useful Tools
- Q & A





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BACKGROUND

Who is a Limited English Proficient (LEP) individual?

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 Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter



BACKGROUND

Federal Laws:

• Title VI of the Civil Rights Act of 1964

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- Title VI regulations prohibiting discrimination based on national origin
 - Executive Order 13166

What is required?

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• LEP should have meaningful access to federally conducted and federally funded programs and activities.

LANGUAGE ASSISTANCE MEASURES

SLHA believes equitable language processes are essential to providing high quality services:

- To ensure access to all LEP persons who may come in contact with the SLHA's Programs/Services/Activities;
- To ensure SLHA staff are aware of available language assistance services and how to access appropriate services to meet the needs of our LEP population;
- To ensure all LEP persons who come into contact with SLHA are made aware of SLHA's obligation to provide free interpretation services to facilitate their participation in SLHA programs/activities/services;
- To provide periodic review and update of this LAP in accordance with the needs of the SLHA community; and
- To provide written translations of vital documents to LEP persons in accordance with HUD "safe harbors" guidelines.









I SPEAK CARDS

In order to help identify individuals with LEP and determine appropriate language assistance needs, SLHA will provide "I Speak" Cards at its administrative office and developments. Applicants, residents, and program participants may use these cards to indicate their primary language and an SLHA staff member (or in some instances staff from SLHA's third-party property management company) will secure appropriate language assistance services.

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If an individual with LEP is unable to make use of "I Speak" Cards because of reading limitations or disability, SLHA staff will make reasonable efforts to ascertain interpretation needs and provide language assistance services in an alternative manner.



ORAL INTERPRETATION

•Oral Interpretation - Staff

•Where feasible, bilingual staff will be utilized to communicate with individuals in their native languages and to assist them in reviewing materials, answering questions, and responding to forms and information requests.

•Oral Interpretation - Telephone Support

•SLHA will use the services of Language Line Solutions, a professional telephone interpretation service, whenever requested by an individual with LEP and/or when an individual uses an I Speak card to signify that they speak a non-English language and/or when SLHA staff recognizes the person with LEP and his/her need for language services (and a qualified staff person that speaks the appropriate language is unavailable). The toll-free language line is 1-800-752-6096.

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O R A L I N T E R P R E T A T I O N

•Oral Interpretation – Third-Party, In-Person Assistance

•When in-person assistance is necessary to ensure meaningful access and SLHA deems other oral interpretative services insufficient, SLHA will provide third-party, in-person interpretation services at no cost to the individual with LEP through local community partners or qualified, third-party, interpretation services.

•However, in consideration of balancing costs with maximum delivery of program benefits, these services will be offered as a last resort.

•SLHA will generally strive to rely on the assistance of bilingual staff members or the assistance of non-profit organizations, and where appropriate, the use of telephone assistance.

•If the LEP person does not wish to use the free interpretation services provided by SLHA, the LEP person may provide their own interpreters at their own expense. LΑΡ



ORAL INTERPRETATION

•Oral Interpretation - Use of Other Interpreters not provided by SLHA

•An LEP individual's request to use their own qualified, trained interpreter will be allowed at the individual's own expense. Use of family members and friends, especially minor children, as interpreters is strongly discouraged. Exceptions may be made where:

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- the contact with the LEP person is of a routine nature;
- the contact is one that does not involve confidential matters; or
- the contact does not involve significant or complex matters impacting the applicant or resident's housing status, rent payments, or lease compliance issues; **and**
- the LEP person signs a release that indicates alternative services were offered and refused.

Staff are advised to be alert to the potential of any conflict of interest or competency issues that may arise from the involvement of family or friends. If staff have questions about the appropriateness of allowing family and friends as interpreters, please consult the LAP Coordinator for guidance.



ATENDIENDO LAS PREOCUPACIONES DE LOS INQUILINOS DURANTE LA EMERGENCIA NACIONAL POR EL COVID-19



EL ALQUILER DEBE SEGUIRSE PAGANDO DURANTE LA

EMERGENCIA NACIONAL POR EL COVID-19. HABLE CON SU ARRENDADOR DE INMEDIATO SOBRE UNA POSIBLE REDUCCIÓN DEL ALQUILER SI USTED TUVO UNA PÉRDIDA DE INGRESOS.

113 de marco de 2020, el presidente Donald J. Trump fitmó una declaración de emergenda nacional relacionada con la pandenia del coronaviru. La emergencia nacional ha tenido seculas profundas pana las operaciones de so projekcidem unificalmente asegunates por la THA, que reciden antiendo de ULIO. Muccio legolitico han serdido su trabajo o han sufficio recortes en las home de trabajo y estin precoupados acerta de cómo pagarán el localer una dense nexeltadas bálcos.

ed está recibiendo este folieto porque su complejo apartamental participa en un programa administrado ; epartamento de Vivienda y Desarrolio Urbano de los Estados Unidos.

eto enumera brevemente información importante sobre el pago del alquiler durante la emergencia nacio

Debe seguir pagando el alquiler? Los pagos de siguifer deben seguir haciéndose en la fecha habitual durante la emergencia nacional. Si h

tenido una reducción en sus ingresos o un cambio de discunstancias que dificultarán el pago oportuno del algullar, comuniquese con su casero de inmediato.

iene problemas para pagar el alquiler?

for ejemplo, si ha perdido su trabajo, ha sido suspendido sin salario o ha tenido un recorte en las horas de Irabajo.

 Si moche antitescie para si deglier financiate jora il IIUD y ha experimentato una mulcición en una ligneras, dilugiong que ser malia una receltación de legenara con a distributación de esposite al tra propriedant na propriedant para propriedant para fordantase positivas para degli escala parte del degli menera mel deguida de la patienta de la quiera o una excepción por effautates financienza con a que cana para del escalamente ma deguida de la patienta de la organización de esa propriedant fastedima INO estato indexe en el cálculo de sus impresos. Es possible que la administración de sus propriedad también se pada de utorizo mesmo texa.

¿Le preocupa acudir a la oficina de alquiler para una reunión o para firmar documentos? El HUD le
permitirá enviar una firma alternativa por correo electrónico, fas u otro método electrónico, tiempre y
cuando proportione un firma artigital depuiel. Pregunte al administrador de su propiedad aserva de las
maneras en ou suede prococionar un firma alternativa in tenero una acudir al administrador de susanos.



T R A N S L A T I O N S E R V I C E S

Vital documents may be made available in other languages upon request as resources permit and will be maintained for future use as needed to develop a database of translated documents.

Vital documents include, but are not limited to:

- •Documents that must be provided by law; •Complaint, consent, release or waiver forms;
- •Application forms;

•Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the LEP person;
•Form or written material related to individual rights;
•Notice of rights, requirements, or responsibilities; and,
•Notices regarding the availability of free language assistance services for LEP individuals.

HUD provides a selection of program documents in ten to thirteen languages other than English: <u>HUD Translated Documents</u>.

Translated documents are offered as a convenience to assist in understanding individual rights and obligations. Any inconsistency between an English version and a translated version of any SLHA or HUD document is invalid – the English wording will prevail.

COMMUNITY RESOURCES

Building stronger organizations through community resources



RESOURCES

SLHA will identify and maintain a list of partner organizations at the state and county level that serve LEP communities to assist in outreach efforts for program announcements, application opportunities, and other public information.

SLHA will incorporate multi-lingual messages in its outreach documents that are not translated: these standard messages will indicate the availability of language assistance services upon request.

SLHA may provide translations of outreach materials in other languages when outreach efforts are targeted towards specific LEP communities. 202





COMPLAINTS & APPEALS

LEP program applicants wishing to appeal eligibility or other programmatic decisions may also contact SLHA's Ombudsman. The Ombudsman will provide an interpreter to assist the applicant with the appeals process. SLHA will leverage the language line service and bilingual staff to provide interpretation services as needed for all appeal processes and all meetings related to program eligibility determinations.

Ombudsman St. Louis Housing Authority 3520 Page Blvd. St. Louis, Missouri (314) 531-4770

Any person who feels that he/she has not been provided with adequate language assistance services. Written complaints may be submitted to the SLHA LAP Coordinator:

SLHA LAP Coordinator St. Louis Housing Authority 3520 Page Blvd. St. Louis, Missouri <u>LAP@slha.org</u> (314) 531-4770

Q & A



LAP

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2023