



## City and County of Sacramento Language Access Plan

SHRA takes reasonable steps to ensure that Limited English Proficiency (LEP) persons are provided equal access to participation in its programs at the same level as native English speakers. This Language Access Plan serves as the policy document for language access provision for SHRA.

This policy is in accordance with Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination on the basis of national origin and Executive Order (EO) 13166, which directs all federal agencies including the U.S. Department of Housing and Urban Development (HUD) to ensure all programs receiving federal assistance provide meaningful access to LEP persons. In addition, this Plan is in accordance with HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, dated January 22, 2007.

SHRA's Language Access Plan (LAP) is primarily program-based; however, certain administrative functions may also need to serve LEP individuals, families, vendors, and the public. All SHRA departments and administrative functions will follow the standards set forth in SHRA's Language Access Plan.

**A. Meaningful Access: The Four Factor Analyses.** Recipients of federal funds are required to take reasonable steps to ensure meaningful access to LEP persons to receive critical services while not imposing an undue financial burden on local government. SHRA's assessment of services provided in accordance with regulations and guidelines are assessed using a Four Factor Analysis established by HUD.<sup>1</sup> The Four Factor Analysis considers:

1. The number or proportion of LEP Persons served or encountered in the eligible service population;
2. The frequency with which LEP persons come into contact with the programs;
3. The nature and importance of the program, activity, or service provided by the Agency;

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<sup>1</sup> U.S. Department of Housing and Urban Development., "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" 72 F.R. 2732 (Jan. 22, 2007).

4. The resources available and cost.

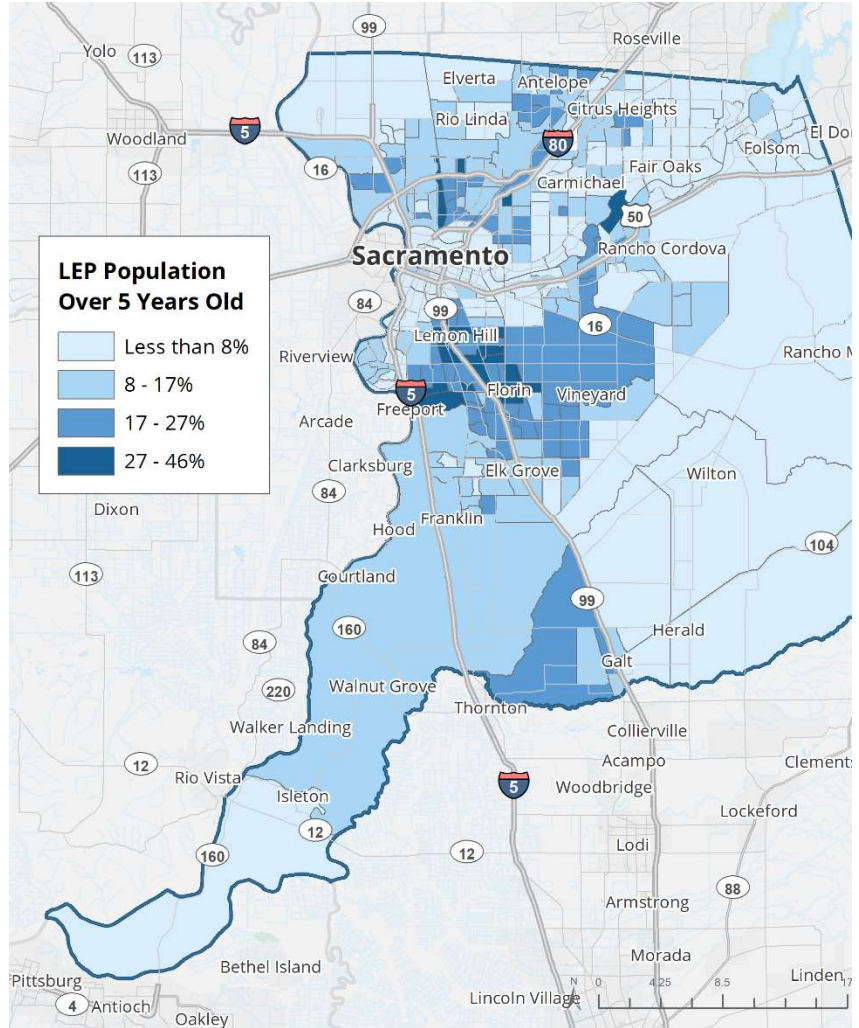
**FACTOR 1. The number or proportion of LEP persons served or encountered in the eligible service population in the City and County of Sacramento.**

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English are generally considered LEP, and may need and be entitled to language assistance with respect to a particular type of service, benefit or encounter. SHRA seeks to communicate effectively with LEP persons who may be seeking information about SHRA's programs, as well as program applicants/potential clients, current program participants/tenants, family members of applicants and participants, and property owners/landlords, and contractors.

**Distribution of Total LEP population.** The Census' 2022 5-year American Community Survey update estimates that there are 74,000 people in the City of Sacramento and 206,000 people in Sacramento County over 5 years of age who speak English "less than very well." This is equivalent to 14% of the city's population and 13% of the county's population. This compares to 17% LEP residents in the State of California overall. The percentage of LEP persons receiving assistance from SHRA programs is slightly less than LEP data countywide. Combined program participants in 2024 totaled 13,978 with 12% or 1,685 individuals identified as LEP persons. Figure 1 shows the distribution of LEP individuals in Sacramento County.

**Figure 1.  
LEP Distribution**

Source: American Community Survey  
5 year estimates, 2022



Source: 2022 American Community Survey.

**City of Sacramento LEP Languages.** Within the LEP groups, the languages with the highest population of residents who do not speak English well in the city of Sacramento are Spanish, other Asian languages, Chinese, and other IndoEuropean languages. Proportionately, Chinese and Vietnamese are the highest LEP, followed by other Asian languages and Russian.

**Figure 2.**  
**City of Sacramento LEP Languages**

Source: American Community Survey 5 year estimates, 2022

Note: Data from the American Community Survey relies on self-reporting and does not specify various dialects spoken within a language (e.g. for Chinese-speaking individuals, Mandarin, Cantonese, etc.).

City of Sacramento	% LEP	# LEP
Spanish	37%	33,057
Other Asian languages	42%	10,661
Chinese	62%	9,805
Other IndoEuropean languages	32%	8,323
Vietnamese	65%	5,882
Tagalog	38%	3,180
Russian	41%	2,391
Arabic	19%	1,352
Korean	21%	184

**County of Sacramento LEP Languages.** Consistent with the city of Sacramento, within LEP groups, the languages with the highest population of residents who do not speak English well in the county of Sacramento are also Spanish, other Asian languages, Chinese, and other IndoEuropean languages. Likewise, Chinese and Vietnamese are the highest LEP proportionately in the county followed by other Asian languages and Russian.

**Figure 3.**  
**County of Sacramento LEP Languages**

Source: American Community Survey 5 year estimates, 2022

Note: Data from the American Community Survey relies on self-reporting and does not specify various dialects spoken within a language (e.g. for Chinese-speaking individuals, Mandarin, Cantonese, etc.).

County of Sacramento	% LEP	# LEP
Spanish	34%	71,814
Other IndoEuropean languages	41%	30,879
Russian	54%	25,974
Chinese	57%	22,625
Other Asian languages	39%	21,246
Vietnamese	63%	17,840
Tagalog	35%	9,954
Arabic	21%	3,403
Korean	48%	2,153

**SHRA LEP Distribution.** Most of the federally funded services and programs at SHRA are targeted to low- and extremely low-income households; however, the U.S. Census LEP data is not cross-tabbed with household income to evaluate the potential income eligibility of LEP persons for HUD programs. As such, it must be assumed that the data above represent low income populations, as well as populations overall.

The Public Housing and the Housing Choice Voucher programs compared with the community percentage of each language yields the following. The top five languages served at SHRA are

shown in Table 1. However, SHRA strives to close the gap of services provided to Spanish-speaking LEP persons participating in, applying to, or requesting information about its programs.

From the data for both the larger applicant pool and the lottery pool, we can see that similar ethnic groups of families with limited English capabilities were selected. In 2024, there were a combined total of 110,861 families on all SHRA wait lists. When these families are added to the number of families participating in HCV and those residing in Public Housing, the total number is 124,839, which yields the following percentages:

**TABLE 1 SHRA LEP Persons on Waitlists and Existing Families**

Top Five Languages	# of Families on Waitlist	% of Families on Waitlist
1. Persian	124	0.24%
2. Spanish	123	0.24%
3. Russian	108	0.21%
4. American Sign Language	79	0.15%
5. Pashto	75	0.15%

\*Total HCV and Public Housing waitlist applicant records is 81,047-42,773.

**TABLE 2: Comparison of SHRA LEP Participants with Sacramento County LEP Individuals**

Housing Authority Top 6 Languages	# Housing Authority Families*	% of Housing Authority Families*	Sacramento County Ranking	Sacramento County %
Russian	453	2.91%	3	<1%
Vietnamese	384	2.47%	6	1%
Hmong	296	1.90%	NA	<1%
Spanish	190	1.22%	1	4.5%
Chinese	148	0.95%	4	1.4%
Persian	84	0.54%	N/A	N/A

\*Total HCV and Public Housing LEP Participants.

Based on 2024 participant data, approximately 10% of 12,025 participating families receiving HCV assistance identified as LEP persons (see Appendix A). Outreach to Asian-language

speakers has been more successful and SHRA continues to improve outreach to Spanish speaking individuals and families to ensure that it is meeting the local housing needs of the County’s largest identified LEP population.

In 2024, 2,881 participant families received public housing assistance, with approximately 8.5% identified as LEP persons (see Appendix A).. However, this reporting has significantly improved over the last year due to training provisions to ensure accurate information is collected as part of the recertification/intake process in order to capture all LEP families living in Public Housing or participating in the HCV program.

**TABLE 3: Percentage of LEP Served by Program**

SHRA Program	Percentage of Top 5 Languages Served
<b>Housing Choice Voucher (HCV)</b>	
Russian	3.17%
Vietnamese	2.36%
Hmong	2.17%
Spanish	0.97%
Chinese	0.75%
<b>Public Housing</b>	
Vietnamese	3.27%
Spanish	3.01%
Chinese	2.39%
Russian	1.09%
Romanian	0.57%

**FACTOR 2. The frequency with which LEP persons come into contact with the programs.** On average, a family may come in contact with Housing Authority staff at least three times a year for various reasons. Initial applications for Public Housing and Housing Choice Vouchers are accepted online. Once selected for housing, the lease-up process may take two or three visits or interaction with SHRA staff. After that, there is the annual recertification process, the annual inspection process, as well as any required updates to family income or composition.

**FACTOR 3. The nature and importance of the program, activity, or service provided by the Agency.** The provision of affordable housing and housing assistance meets a critical need in any community. In Sacramento County, there are 2,881 public housing residents and 13,630 voucher holders.

Housing Choice Voucher. To successfully participate in the HCV program, applicants and tenants must be able to participate in compulsory activities, such as the voucher briefing, the annual re-

examination and inspection/re-inspection process, and attendance at informal reviews or hearings when a family is denied assistance or termination from the program is proposed. Being able to understand SHRA's information is vital to obtaining a voucher, finding and moving into housing, remaining in the home, and remaining in the program through compliance with program requirements and regulations.

**Public Housing.** To participate successfully in SHRA's public housing program, applicants and tenants must be able to complete the application, understand the occupancy policies and leases or rental agreements along with house rules so that they can enjoy residing in their homes while abiding by those rules. Additionally, it is crucial that residents of public housing understand written notices about the program and their continued participation in the program.

**FACTOR 4. The resources available and cost.** The Housing Authority is committed to spending the resources needed, within reason, to ensure that LEP families are accommodated. With approximately 1,685 documented LEP families (or 10% of combined program participants) coming into contact with Housing Authority staff approximately three times per year, more than 5,000 annual LEP contacts occur, mostly during inspections and annual recertifications.

SHRA has a contract with a Stratus translation that provides interpretation and translation services in more than 180 languages. During the past year, SHRA provided telephonic interpretation services for LEP participants in 15 different languages.

The Housing Authority is committed to translating vital documents when it is necessary for the family to have equal access to housing services; however, the current cost to provide translated documents in all of the languages spoken by LEP persons in populations exceeding 1,000 is disproportionate to the frequency of the contact between these populations and SHRA and their participation in its programs. Using vital documents translated by HUD is the most cost-effective option. However, there are still instances when documents must be customized to contain specific information detailing the participant's particular case. Protocol is in place to ensure these participants are aware of access to free language assistance.

Both the Housing Authorities of the City and County of Sacramento have approved the Agency's budget resolutions, which include annual funding to cover costs for on-call and translation services. In addition, SHRA has identified several bilingual staff members who are available to assist with translation and interpretation services in Spanish, Chinese (Cantonese and Mandarin), and Hmong.

Additionally, SHRA maintains positive relationships with social service agencies and community based organizations that can assist with informal translations in a variety of languages.

It is a priority to use limited funding to maximize access to as many vital documents as possible. An analysis of vital documents for translation in Appendix C identifies those documents that have already been translated by HUD or others, those documents for which the most vital

information can be provided in a summary, rather than a translation of the entire document, and those documents where interpretation of the document will be available in multiple languages.

## **The Language Access Plan (LAP)**

SHRA has prepared this LAP to address the identified needs of the LEP populations served or potentially served by its programs. In compliance with federal guidelines, SHRA will make reasonable efforts to provide free language assistance for LEP clients in all of its programs so as to ensure that these individuals have meaningful access to programs.

SHRA is committed to effectively serving LEP persons through this Administrative Plan, and will utilize bilingual staff, on-call telephone interpretations services, downloadable documents from websites, and other resources as necessary to meet the public's LEP needs. Implementation of the LAP will continue to evolve over time in response to data such as the 2022 American Community Survey and new technology resources.

### **B. How LEP Persons Are Identified**

An LEP person is an individual who does not speak English as his/her primary language and who has a limited ability to speak, read, write, or understand English at a level that permits him/her to communicate effectively in the course of applying for, or receiving, agency services or benefits.<sup>2</sup>

LEP residents are typically identified by staff when they first interact with SHRA—e.g., when an application is requested, through a phone call, etc.

### **C. Points and Type of Contact with LEP Persons**

#### **Wait Lists**

**Housing Choice Voucher.** The Housing Choice Voucher Program operates using a computerized and randomized lottery system. Wait list times vary and, because the demand for vouchers far outweighs the supply, the wait list is open only periodically.

**Public Housing.** The Public Housing program has site-based wait lists. Various lists open and close at different times as the need for more applicants to occupy rental housing units arises.

**Online Wait list Information.** When the wait lists are open for Public Housing or Housing Choice Vouchers, applications are accepted electronically in several languages via a web portal at [www.sacwaitlist.com](http://www.sacwaitlist.com). This website is google translate enabled and has information in multiple languages indicating that assistance is available and how to contact the Agency.

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<sup>2</sup>U.S. Department of Housing and Urban Development, "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" 72 F.R. 2732 (Jan. 22, 2007).



When letters are mailed to families selected from the waitlist, they contain information urging those with language needs to contact the Agency for professional, reliable, and confidential language assistance.

Public Housing and the Housing Choice Voucher program disseminate information on waitlist opening and closing on the Sacramento Housing and Redevelopment Agency website at [www.shra.org](http://www.shra.org). This site is also google translate enabled with multiple languages available. SHRA also has a contract with Stratus Translation Services used by Housing Choice Voucher staff.

**Intake Appointments.**\_SHRA has combined Intake staff to process applications for Public Housing and Housing Choice Voucher programs. Intake staff have procedures to follow to help new LEP applicants. Intake staff members show the LEP applicant the Language Identification Flashcard so they may point to their preferred language of communication.

Once a client selects a language on the flashcard, Intake staff will contact the Housing Authority's professional, contracted language vendor to request telephonic interpretation in the client's preferred language.

A conference call can be facilitated by Intake staff so that the interpretation-assisted call can take place at the client's home or at SHRA's office. Intake staff facilitates calls with the professional interpreter, the resident or participant, and SHRA staff. This takes a high degree of coordination; however, the benefit is that it helps to make language interpretation available at a time and place that is convenient for the family.

Generally, to fill out a full application and sign other necessary paperwork, the telephonic interpreter will interact with the staff interviewer who will explain to the interpreter what is being asked, and the interpreter will communicate that to the LEP family in their preferred language during a three-way call facilitated by Intake staff. When the LEP family responds in their preferred language, the interpreter then communicates the information to the Intake staff, who can transcribe information from the interpreter onto the English data form. The English data form is the official form.

Intake staff will, with the family's permission, have the family's language input into the housing software system, which has a searchable field for "language." This helps the Housing Authority determine how many families or individuals speak specific languages and better prepares for future communication with the family in their preferred language.

**Briefing Appointments.**\_Any family that wishes to be provided with interpretation services for a briefing appointment will be asked to provide the Housing Authority with 48 hours' notice so that contracted and qualified interpreters who speak the family's language can be scheduled. Sometimes, in-house staff interpreters are available to provide immediate assistance to the families. LEP families can be at home and ask questions of the staff person in real time over the phone or through a virtual meeting format with the help of the interpreter.

**Recertification Appointments.** Annual Recertification packets are mailed to each participant in the HCV program and are provided at Public Housing site offices.

However, if LEP families need help completing the packet they can phone the Agency's call center or, for public housing, the property's office. Staff from either the call center or property site office can call the Agency's contract interpreter and they will place the family on a three-way phone call to explain the questions to LEP families in their native language. HCV call center staff or Public Housing property office staff can take the answers from the interpreter in English and complete the forms.

Often, families use English-speaking third party contacts to complete their paperwork. All tenants or participants who indicate that they would like their third party contact to receive written correspondence from SHRA will receive notice that it is time to recertify for continued eligibility. This enables the third party to work with the family to complete the paperwork accurately and it is more likely to be on time.

#### **D. Outreach and Language Assistance**

**Notice of Right to Language Assistance.** It is important for SHRA to let LEP persons know that language access services are available and that they are free of charge. Notices will be provided in the LEP individual's preferred language.

SHRA will inform LEP persons of language access services by:

- Posting signs in common areas, offices, and on the premises where applications are completed in person. These signs are posted in multiple languages and state that language services are free upon request;
- Stating in outreach materials that free language access services are available;
- Working with community organizations to inform LEP persons of the availability of language services;
- Updating the current phone system to include more language options for the languages most frequently requested;
- Informing LEP individuals online through the SHRA website that language-access assistance is available, posting identified documents in multiple languages.

**Additional Outreach for Housing Choice Voucher.** SHRA will provide notices in non-English print and online social media about available language assistance services and how to access them. Publicizing the opening of the HCV wait list is conducted through news items in ~~the following~~ English and non-English media outlets prior to and during the opening of public housing and the Housing Choice Voucher Program wait lists.

## E. Staff Capacity and Training

**Staff Capacity.** The Agency has designated a staff member for the Housing Choice Voucher and the Public Housing Programs to be Language Access Plan (LAP) Coordinator for these program duties. LAP Coordinator(s) are responsible for monitoring LEP activities in the HCV and Public Housing programs. Staff, residents, participants, and public suggestions to improve or revise efforts to accommodate LEP families' needs are directed to these LAP Coordinator(s). The two LAP Coordinators report directly to the Assistant Director for each program. The Assistant Directors have overall responsibility for ensuring that resources are available for program compliance and for coordination and cooperation between the programs. In addition to the contracted vendor, which can provide interpretation services in more than 180 languages, certain staff members have been identified for language interpretation to provide oral and/or written translation assistance.

**Staff Training.** Staff members who interact with clients receive training on using the "Language Identification Flashcards" and the Agency's translation services vendor. This training is documented so that new staff members are exposed to it as part of the orientation process in their departments. Existing staff members are also provided periodic refresher trainings on these procedures.

Staff training topics include:

- Discussion of the Language Access Plan and obligation to provide language assistance
- How to respond to LEP callers
- How to respond to written/email communications from LEP clients
- How to respond to in-person LEP clients
- How to use "Language Identification Flashcards"
- How to operate the on-call telephone interpretation services
- Becoming familiar with staff and outside vendors available for interpretation at appointments
- Becoming familiar with the location of translated documents
- How to correctly document language preference in SHRA's database

In accordance with 24 CFR §§982.54(d)(6) and 982.304, SHRA will educate Housing Choice Voucher Program staff of their obligation to assist families claiming that discrimination has prevented them from leasing a suitable unit by providing them information on how to complete and file a housing discrimination complaint.

## F. Language Access Measures and Services Provided

**Language Access Measures.** Language access includes interpretation and/or translation. SHRA identifies interpretation to be spoken language assistance, while translation refers to providing written information in the identified language that assistance is needed. However, there will be times when language assistance may include oral interpretation of a written document.

SHRA will determine when interpretation and/or translation are needed and reasonable. Staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance, and SHRA determines that the client is an LEP person, SHRA will make reasonable efforts to provide free language assistance. SHRA has the discretion to determine the type of language assistance necessary to provide meaningful access to its programs.

### Written Translation

**Vital Documents.** HUD has defined “vital documents” as those forms or documents that are critical for ensuring meaningful access, or awareness of rights or services, or federally funded services or benefits. SHRA staff have reviewed forms and policy documents and identified those which would be classified “vital” for both HCV and public housing programs in Appendix C. HUD Guidance notes that “vital” information may include, for instance, the provision of information in appropriate languages other than English regarding where an LEP person might obtain an interpretation or translation of a document.

The list of vital documents may be revised to meet the needs of LEP families. Requests may come from staff, residents, participants, managers or executives and will be routed through the LEP Coordinators for each program. Documents in specific languages will be placed in a designated language folder in the appropriate Agency electronic library so that both programs may utilize documents originated by the other, as appropriate. Documents specific to each program may be kept in electronic folders in those department drives, filed by form or function.

SHRA will begin to phase in translated documents to be in compliance with the federal standard as required to translate those documents into at least several of the more frequently encountered languages and will set benchmarks for continued translations into the remaining languages over time. A phased strategic approach to translation is suggested within fiscal constraints by incorporating those forms or brochures that have been translated by HUD, and identifying those where a summary rather than the entire document may be sufficient. In the meantime, a cover sheet will be included with written materials for LEP participants that indicates that language access is available and how to obtain these services free of charge. As vital documents are phased into circulation, a cover sheet will be used to provide summary information of documents for participants. See Appendix C for a full list of vital documents.

A reasonable alternative to preparing written translation of all SHRA documents is providing oral interpretation of the document. In the Analysis of Vital Documents in Appendix C, staff has

evaluated whether to translate the document in its entirety, translate a summary or highlights, use a translation available from other resources, or attach a cover sheet to the form offering oral translation. Based on analysis of Factors 1 and 2, the document cover sheet with a statement that oral translation is available should be available in Spanish, Russian, Chinese, Vietnamese, Persian and Hmong.

SHRA is committed to providing translation of vital documents to LEP persons. According to the 2022 5-year American Community Survey, only LEP Spanish speakers approach the 5% threshold (4.8% in the county and 6.6% in the city). However, this does not minimize the importance of ensuring that resources are available for LEP persons when a population threshold of 1,000 is met.

**TABLE 4: Safe Harbor Guidelines**

<b>Size of Language Group</b>	<b>Recommended Provision of Written Language Assistance</b>
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

## **Interpretation Services**

**Oral Language.** Oral interpretation can be provided by formal (e.g. contracted professional vendors) or informal interpreters (e.g. family member, friend or other individual fluent in English and the necessary language). SHRA is committed to accuracy in interpretation services provided to LEP persons.

When services are provided by SHRA, these services will be provided in a timely manner (“provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person.”) [2007 HUD LEP Federal Guidance, VI A 1]

**Formal Interpreters Preference.** While many applicants, public housing residents, and Housing Choice Voucher participants prefer to bring relatives and friends to interpret English for them in their native language, SHRA employees are advised to use the SHRA’s professional language assistance contractor to ensure accurate translations are provided to the families on technical program issues and to avoid sensitive information being shared with relatives/children/friends.

Staff must advise LEP persons about the availability of free language services. Even if the applicant, resident, or participant is accompanied by a friend, relative, or caseworker fluent in his or her preferred language, SHRA reserves the right to have a housing authority-contracted professional interpreter assist in the process to ensure that the companion’s interpretation is accurate. The interpreter will not disclose non-public data without written authorization from the client.

**Informal Interpreters.** An LEP person may use an informal interpreter of his or her own choosing and at his or her own expense, either in place of, or as a supplement to, the free language assistance offered by SHRA. If possible, SHRA will accommodate an LEP client’s request to use an informal interpreter in place of a formal interpreter. There are some situations where family members or friends are not suitable translators (e.g. family members under 18 years of age who may not have the ability to translate technical terms or perpetrators of domestic violence, or elder abuse, or suspected perpetrators of program fraud who should not be allowed in the same room with the applicant, resident, or participant during the interpretation). There may also be issues of confidentiality, competency, or conflict of interest.

If an LEP client prefers an informal interpreter to interpret after SHRA has offered free interpretation services, the informal interpreter may interpret. In these cases, the client and interpreter may sign a waiver of free interpretation services or other documentation of the offer of formal interpreter services, the refusal, and SHRA’s accommodation of the client’s wishes. SHRA staff must be sensitive to the feelings of the LEP person, but personal safety must be a priority.

## **G. Monitoring and Updating the Language Access Plan (LAP)**

SHRA will monitor the impact of its LAP by seeking the feedback of those who use LAP services. The LAP and demographics and the need for LEP services is reviewed as part of the 5-year Consolidated Plan. . Changes in procedures will be incorporated on an ongoing basis ensure that SHRA maintains consistency with the LAP Plan and that daily service efforts adequately serve LEP clients.

SHRA will review the LAP periodically, but no less than every three years, to evaluate its overall effectiveness and any changes in the LEP populations or their needs. Modifications to the Plan may be based on:

- Frequency of contact analysis of LEP clients and callers by staff
- Analysis of requests for interpreters and translation, as well as literacy skills of clients requesting language assistance: number of requests, languages requested, costs, etc.
- Reports from SHRA's database system on the numbers of program participants who are LEP and listing the languages used by LEP clients
- Based on the above data, assessment of whether existing language assistance services are meeting the needs of clients who are LEP
- Assessment of whether staff members understand the LAP and procedures
- Review of vital documents and appropriateness of translations available
- Nature and importance of activities and information to LEP clients
- Availability of resources
- Whether identified sources for assistance are still available
- U.S. Census data/American Community Survey

SHRA employees, program applicants, HCV program participants, or public housing residents who receive a report, or become aware, that a LEP person believes he/she has not been provided with language assistance services in accordance with this LAP should report that information to the LAP Coordinator(s). Incidents will be documented for response and will indicate if any immediate action is needed to update the LAP.

## APPENDIX A: 2024 SHRA HCV and Public Housing LEP Participants

Language	# Participants	Program
Afrikaans	2	hcv
American Sign Language	14	hcv
Arabic	8	hcv
Armenian	6	hcv
Azerbaijani	1	hcv
Bosnian	2	hcv
Cambodian	1	cnv
Chinese (Cantonese)	102	hcv
Chinese (Cantonese)	26	cnv
Chinese (Mandarin)	17	hcv
French	1	hcv
German	2	hcv
Hindi	1	hcv
Hmong	296	hcv
Hmong	2	cnv
Khmer	2	hcv
Korean	7	hcv
Korean	1	cnv
Lao	5	hcv
Lao	4	cnv
Mien	20	hcv
Mien	2	cnv
Pashto	11	hcv
Persian	84	hcv
Persian	4	cnv
Polish	1	hcv
Punjabi	1	hcv
Romanian	15	hcv
Romanian	6	cnv
Russian	432	hcv
Russian	11	cnv
Samoan	1	hcv
Spanish	132	hcv
Spanish	32	cnv
Tagalog	3	hcv
Tagalog	1	cnv
Ukrainian	72	hcv
Uzbek	1	hcv
Vietnamese	321	hcv
Vietnamese	35	cnv



## APPENDIX B: 2024 SHRA HCV and Public Housing Ranking of LEP Participant and Waitlist

<b>HCV Program Languages</b>		
Total Number of Participants: 13,630		
<b>Top Six Languages</b>	<b># of HCV Families</b>	<b>Percent</b>
1. Russian	432	3.17%
2. Vietnamese	321	2.36%
3. Hmong	296	2.17%
4. Spanish	132	0.97%
5. Chinese	102	0.75%
6. Persian	84	0.62%

<b>Public Housing Program Languages</b>		
Total Number of Participants: 2,881		
<b>Top Five Languages</b>	<b># of HCV Families</b>	<b>Percent</b>
1 Spanish	62	2.62%
2 Chinese	55	2.33%
3 Vietnamese	52	2.20%
4 Russian	19	0.80%
5 Hmong	12	0.51%

<b>Top 5 Program Languages for Combined Programs with Waitlists</b>		
Total Participants: 81,322		
<b>Top Five Languages</b>	<b># of Applicants</b>	<b>Percent</b>
1. Persian	124	0.15%
2. Spanish	123	0.15%
3. Russian	108	0.13%
4. American Sign Language	79	0.10%
5. Pashto	75	0.90%

## APPENDIX C: Analysis of Vital Documents

Keeping in the spirit of HUD's "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons", this is an expansive list of identified vital documents. However, this list is subject to change throughout a given year due to federal changes and guidelines.

Phase 1: 2016-2019					
HCV Intake Forms, Letters and Notices	Translation of Full Document	Translation of Summary	Cover Sheet Offering Oral Translation	Translations Available	HUD Form Number
Anticipated Withdrawal	X			CH, HMG, RUS, SP, VTN	
Informal Review (IR) request	X			CH, HMG, RUS, SP, VTN	
IR appointment		X		CH, HMG, RUS, SP, VTN	
IR rescission		X		CH, HMG, RUS, SP, VTN	
IR decision		X		CH, HMG, RUS, SP, VTN	
Prop term rescission		X		CH, HMG, RUS, SP, VTN	
Termination of Assistance	X			CH, HMG, RUS, SP, VTN	
Interview Invite		X		CH, HMG, RUS, SP, VTN	
Final Int. Invite (for Part B app)		X		CH, HMG, RUS, SP, VTN	
Interview attended letter		X		CH, HMG, RUS, SP, VTN	
Briefing Appt.	X			CH, HMG, RUS, SP, VTN	

RA forms	X			CH, HMG, RUS, SP, VTN	
Port Denial	X			CH, HMG, RUS, SP, VTN	
Return to waiting list		X		CH, HMG, RUS, SP, VTN	
Remove from waiting list	X			CH, HMG, RUS, SP, VTN	
Voucher change		X		CH, HMG, RUS, SP, VTN	
Voucher extension		X		CH, HMG, RUS, SP, VTN	
2nd Voucher extension		X		CH, HMG, RUS, SP, VTN	
Voucher Expired	X			CH, HMG, RUS, SP, VTN	
Self-Termination		X		CH, HMG, RUS, SP, VTN	
Suspension of Process	X			CH, HMG, RUS, SP, VTN	
Zero Income Checklist		X		CH, HMG, RUS, SP, VTN	
Pre App update	X			CH, HMG, RUS, SP, VTN	
Pre App update confirmation letter		X		CH, HMG, RUS, SP, VTN	
Add on Request		X		CH, HMG, RUS, SP, VTN	
Denial from complex		X		CH, HMG, RUS, SP, VTN	

Additional Info Requested	X			CH, HMG, RUS, SP, VTN	
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PBV Initial Interview Briefing	X			CH, HMG, RUS, SP, VTN	
PP - Second Interview Appointment	X			CH, HMG, RUS, SP, VTN	
Eligibility Denial Notice	X			CH, HMG, RUS, SP, VTN	
Notice Advising of Free Language Assistance	X			CH, HMG, RUS, SP, VTN	
Authorization for the Release of Information/Privacy Act Notice				AM, AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, TG, VTN	9886
A Good Place to Live (Housing Quality Standards)				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	HUD-593-PIH
Certification of Domestic Violence, Dating Violence, or Stalking				HUD FORM	
Fair Housing Equal Opportunity for All				AR, CAMB, CH, KOR, RUS, SP, VTN	HUD-1686-1-FHEO
Are You A Victim of Housing Discrimination?				AR, CAMB, CH, KOR, RUS, SOM, SP, VTN	HUD-903.1

**HCV Only**

Application		X	X	CH, HMG, RUS, SP, VTN	
Voucher	X			AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52646
Statement of Homeowner Obligations				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52649
Family Self-Sufficiency Program Contract (Instructions and Attachment)				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52650
Family Self Sufficiency Program Escrow Account				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52652
Housing Assistance Payments Contract Section 8 Tenant-Based Assistance				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52641
Tenancy Addendum Section 8 Tenant-Based Assistance HCV Program				AM, AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52641-A
Supplement to Application for Federally Assisted Housing: Supplemental and Optional Contact Information				AM, AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	92006

Fraud Notification					1141
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Request for Tenancy Approval – HCV				AM, AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, TG, VTN	52517
HUD Allowances for Tenant-Furnished Utilities and Other Services				AR, CAMB, CH, CREOLE, FR, HMG, KOR, RUS, SP, VTN	52667
Contract Termination Notice			X	CH, HMG, RUS, SP, VTN	
Disposition Notice			X	CH, HMG, RUS, SP, VTN	
Exclusion of In-Home Supportive Services (IHSS) Income	X			CH, HMG, RUS, SP, VTN	
Family Obligations	X			CH, HMG, RUS, SP, VTN	
Informal Hearing Request	X			CH, HMG, RUS, SP, VTN	
Live-In Aide Yearly Certification Notice	X			CH, HMG, RUS, SP, VTN	
Mandatory Tenant Conference Disposition Notice (with WARNING for recertifications ONLY)			X	CH, HMG, RUS, SP, VTN	
Notice of Mandatory Tenant Conference			X	CH, HMG, RUS, SP, VTN	

Notice of Proposed Termination of HCV Eligibility			X	CH, HMG, RUS, SP, VTN	
Notice of Termination of Assistance			X	CH, HMG, RUS, SP, VTN	
Recertification Notice			X	CH, HMG, RUS, SP, VTN	
Subsidy Adjustment Notice Homeownership Program			X	CH, HMG, RUS, SP, VTN	
Subsidy Adjustment Notice Housing Choice Vouchers (HCV)			X	CH, HMG, RUS, SP, VTN	
Voucher Expiration Notice	X			CH, HMG, RUS, SP, VTN	
Warning Notice			X	CH, HMG, RUS, SP, VTN	
Rescission of Notice of Proposed			X	CH, HMG, RUS, SP, VTN	
Termination of HCV Eligibility			X	CH, HMG, RUS, SP, VTN	
Notice of Termination of Assistance after 180 Days with Zero Housing Assistance Payment (HAP)			X	CH, HMG, RUS, SP, VTN	
Notice of Mandatory Tenant Conference			X	CH, HMG, RUS, SP, VTN	

(recertifications only)					
Mover Request Denial			X	CH, HMG, RUS, SP, VTN	
Mover Request Confirmation			X	CH, HMG, RUS, SP, VTN	
RFTA		X		CH, RUS, SP, VTN, HMG	
Affordability Worksheet		X		CH, RUS, SP, VTN, HMG	
Abatement Letter		X		CH, RUS, SP, VTN, HMG	
RFTA Void	X			CH, RUS, SP, VTN, HMG	
<b>Public Housing Only</b>					
How Your Rent is Determined			X	SP, CH, KR, VTN	HUD Fact Sheet
Application		X	X	CH, RUS, SP, VTN, HMG	
Third Party Docs		X		CH, RUS, SP, VTN, HMG	
Anticipated Withdrawal	X			CH, RUS, SP, VTN, HMG	
Informal Review	X			CH, RUS, SP, VTN, HMG	
IR appointment	X			CH, RUS, SP, VTN, HMG	
Rescind IR (prop term)		X		CH, RUS, SP, VTN, HMG	
Termination of Assistance	X			CH, RUS, SP, VTN, HMG	



Interview Invite	X			CH, RUS, SP, VTN, HMG	
Final Int. Invite (for Part B app)	X			CH, RUS, SP, VTN, HMG	

Interview attended letter		X		CH, RUS, SP, VTN, HMG	
Return to waiting list		X		CH, RUS, SP, VTN, HMG	
Remove from waiting list	X			CH, RUS, SP, VTN, HMG	
Fingerprint invite	X			CH, RUS, SP, VTN, HMG	
Final Fingerprint invite	X			CH, RUS, SP, VTN, HMG	
Application		X	X	CH, RUS, SP, VTN, HMG	
Third Party Docs		X		CH, RUS, SP, VTN, HMG	
Anticipated Withdrawal	X			CH, RUS, SP, VTN, HMG	
Informal Review	X			CH, RUS, SP, VTN, HMG	
IR appointment	X			CH, RUS, SP, VTN, HMG	
Rescind IR (prop term)		X		CH, RUS, SP, VTN, HMG	
*Leases			X	CH, RUS, SP, VTN, HMG	
3, 14, and 30 day Notices			X	CH, RUS, SP, VTN, HMG	

Hearing Notice			X	CH, RUS, SP, VTN, HMG	
Grievance Procedure			X	CH, RUS, SP, VTN, HMG	
Termination of Tenancy Procedures			X	CH, RUS, SP, VTN, HMG	
Termination letter for PH			X	CH, RUS, SP, VTN, HMG	
Full Move In Packet					N/A, PHA Generated
(The following documents are not PHA Generated.)					
Debts Owed to the PHA and Terminations			X	CH, RUS, SP, VTN, HMG	52675
Allowances for Tenant – Furnished Utilities and Other Service					52667
Family Report					50058
Authorization for the Release of Information/Privacy Notice					9886

Key: AM= Amharic, AR=Arabic, CAM= Cambodian, CREOLE=Creole, CH=Chinese, FR=French, HMG=Hmong, HND=Hindi, KOR=Korean, RUS=Russian, SOM=Somali, SP=Spanish, TG=Tagalog, VTN=Vietnamese

**Legal considerations of translated leases and documents.** HUD recommends that when leases are translated into languages other than English, Public Housing Authorities (PHAs) should only ask the tenant to sign the English lease as the only binding document. "The translated document would be provided to the tenant, but marked "For Information only." HUD was asked whether leases, rental agreements and other housing documents of a legal nature are enforceable in U.S. courts when they are in languages other than English and responded generally that the English-language document prevails. The HUD translated documents may carry the disclaimer: "This document is a

translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."<sup>3</sup>

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<sup>3</sup> HUD: Limited English Proficiency (LEP) Frequently Asked Questions  
([http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/promotingfh/lep-faq](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq))