

**Cuyahoga Metropolitan Housing Authority
Housing Choice Voucher Program
Limited English Proficiency Analysis and Plan
October 2012**

OVERVIEW:

CMHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as persons with Limited English Proficiency (LEP).

Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the HCV program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Notice of Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Affecting Limited English Proficient Persons, published January 22, 2007 in the Federal Register.

LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this Plan, LEP persons are HCV applicants and participants, and parents and family members of applicants and participants.

In order to determine the level of access needed by LEP persons, CMHA will balance the following four factors:

1. The Number or Proportion of LEP Individuals to be Served or Likely to be Encountered
2. The Frequency with which LEP Individuals Come Into Contact with the Program
3. The Nature and Importance of the Program, Activity or Service Provided by the Program
4. Resources Available to the Recipient and Costs

Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on CMHA.

FACTOR ONE:

The Number or Proportion of LEP Individuals to be Served or Likely to be Encountered

The service area of the Cuyahoga Metropolitan Housing Authority (CMHA) Housing Choice Voucher Program (HCVP) is Cuyahoga County, Ohio. The CMHA HCVP maintains records of only two ethnicity designations: Hispanic and non-Hispanic.

As of September 1, 2012, the HCVP had a total of 14,937 vouchers. Of these, 589 (3.9%) were Hispanic families.

The 2011 HCVP initial waiting list was comprised of 10,000 applicants. As of September 1, 2012 it had 9,282 applicants. Of those 466 (5%) were Hispanic.

Compared to year 2010 census statistics, 4.8% of Cuyahoga County, Ohio families were Hispanic. The census data further indicate that 18% of Cuyahoga County Hispanic households speak the English language less than “very well”. Based upon that statistic, we project that approximately 106 current CMHA HCVP participant Hispanic households under contract speak English less than “very well”.

Since CMHA does not maintain statistics on ethnicities other than Hispanic, we have only census data to guide us in determining the number of families who may have limited English proficiency in a language other than Spanish. The 2006-2010 5-year estimate of the American Community Survey census data for Cuyahoga County indicates that in 2010, 88.8% of the population spoke only English and another 3.5% spoke Spanish at home. This accounts for nearly 92.3% of Cuyahoga County. The remaining 8% of families speaking a language other than English at home were comprised of 4.8% other Indo-European languages, 1.5% Asian languages, and 1.3% other languages. It should be noted that one cannot assume from these statistics that families speaking another language at home speak only that language, or speak English less than “very well”.¹

Based upon these statistics, Spanish has been identified as the main language the CMHA HCVP should reasonably focus upon at the present time. Spanish is the most prevalent second language in Cuyahoga County.

FACTOR TWO:

The Frequency with which LEP Individuals Come Into Contact with the Program

The minimum frequency of contact for the total 14,332 current subsidy recipients includes initial application, voucher briefing, yearly annual re-exam and yearly annual inspection. Some participants may have one or more additional re-exams (interim re-exams) to report changes in income or family composition. In addition, some families receive emergency inspections for health, safety or life threatening conditions in their housing unit that occur prior to the annual inspection. Some applicants/participants may

have informal reviews, informal hearings, may attend a movers briefing, or may have various questions regarding the program throughout the year.

FACTOR THREE:

The Nature and Importance of the Program, Activity or Service Provided by the Program

CMHA’s mission is to be a leader in providing safe, quality, affordable housing for individuals and families of Cuyahoga County. The main eligibility factor for the HCVP is income limits established by the Department of Housing and Urban Development (HUD). Simply stated, the CMHA HCVP provides, via housing subsidy, safe, decent and sanitary housing to low and moderately low-income families.

Housing is a basic human need, the lack of which can have serious or life-threatening implications for any individual. Therefore, CMHA takes its responsibility as a houser of low to moderately low income families very seriously.

Compulsory HCVP activities include the application/eligibility process including the voucher briefing, the yearly re-exam and inspection, and attendance at informal reviews or hearings when a family is denied assistance or is proposed for termination from the program.

FACTOR FOUR:

Resources Available to the Recipient and Costs

The CMHA HCVP has the following resources available, to ensure that LEP individuals have meaningful access to the HCVP:

- Bilingual Staff
- Interpreting Services
- Translating Services
- Written Notices to LEP Participants and Applicants
- Tag Lines, Indicating the Availability of Language Assistance on Vital Documents
- Use of “I Speak” Cards
- Availability of an Automated Spanish Telephone Option

CMHA Board-Approved Policy:

The Administrative Plan requires that

- “The PHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial status, handicap or disability” (page 1-3).

- “The Housing Authority has bilingual staff to assist non-English speaking families in Spanish, and may translate documents into Spanish” (page 1-7).
- “The PHA will publicize and disseminate information to make known the availability of housing assistance and related services for very low income families when the waiting list is open. When the PHA’s waiting list is open, the PHA will publicize the availability and nature of housing assistance for very low-income families in a newspaper of general circulation, minority media, and by other suitable means. Notices will also be provided in Spanish” (page 1-9).
- “When the PHA opens a waiting list, the PHA must give public notice that families may apply for assistance. The public notice must state where and when to apply. The PHA must give the public notice by publication in a local newspaper of general circulation and also by minority media and other suitable means. The notice must comply with HUD fair housing requirements. (page 3-1).

Goal:

The goal of the CMHA HCVP Limited English Proficiency Plan is to ensure that all individuals (potential applicants, applicants and participants), regardless of primary language spoken, have meaningful access to housing services.

Identification of LEP Population:

The identification of the LEP population for the CMHA HCVP is indicated above, in Factor One.

Language Assistance Measures:

- The CMHA HCVP hires and utilizes bilingual staff as interpreters. As of October 2012, there are five (5) bilingual staff. Of these, four (4) speak Spanish, and one (1) speaks Sri Lankan. The ability to speak more than one language is and will continue to be an important factor in making staff hiring decisions.
- The CMHA HCVP contracts with a professional translating and interpreting service. This ensures that interpreting services are available when bilingual staff are not on duty, or when an LEP individual requires service in a language other than what staff interpreters are able to provide.
- Since the HCVP has a total of 3.9% Hispanic families, and since, based upon census statistics, CMHA projects that approximately 106 Hispanic households speak English less than “very well”, vital documents will be interpreted to individuals when the need arises.
- Documents translated by HUD, and available on its web site, will be utilized as needed. Professional translators may also be contracted, to ensure that accurate

and clearly understandable information is disseminated to the public (for example, when a waiting list lottery is being conducted).

- Tag lines will be posted on all vital documents that free interpretation of vital documents is available from CMHA upon request. The tag lines will appear in English and Spanish.
- CMHA provides interpreters free of charge to families requiring LEP assistance. However, families are permitted to use, at their own expense, an interpreter of their own choosing (including a family member) in place of or as a supplement to the free services offered by CMHA.
- It is not the CMHA HCVP's policy to *require* an individual to hire his or her own interpreter or use a family member as an interpreter. Utilizing a family member or friend as interpreter may violate the individual's right to privacy, and therefore, the decision is left to the LEP individual.
- "I speak" cards will be utilized at the HCVP's three front desks to encourage LEP individuals to self-identify.
- Landlords, participants and applicants may receive automated information 24/7 in English and Spanish via CMHA's Interactive Voice Response (IVR) telephone system. Available information includes check status, inspection and recertification appointment dates, and waiting list status.
- Correspondence received in languages other than English will be referred to a Senior Manager for translation and response. The Manager of Administrative Affairs will provide assistance in procuring outside resources, if requested.
- In-person contacts by individuals speaking a language other than English will be referred to one of the bilingual staff for assistance. If the person speaks a language other than Spanish or Sri Lankan, a request will be made by the staff person to the Manager of Administrative Affairs to utilize the contracted interpreting service.
- Bilingual staff may appear at community events throughout the year as the opportunity arises.

Training staff:

The HCVP Professional Development Instructor provides training to HCVP staff on limited-English proficiency, including its definition, sensitivity to limited-English proficient families, effectively serving limited-English proficient families, what the regulations require with regard to limited-English proficiency, and what CMHA policies and procedures require.

Access to LEP Services:

The CMHA HCVP LEP Plan is made available to the public via the CMHA HCVP web page. The Plan is in English with interpretation of the document upon request.

Staff training, and staff requests for interpreting and translating services will be arranged by the Manager of Administrative Affairs.

Monitoring and Updating the Limited English Proficiency Plan:

Daily monitoring and implementation of the plan will be executed by the Senior Managers and Supervisors in each service area.

The Limited-English Proficiency Plan will be reviewed yearly by the Manager of Administrative Affairs to determine whether updates are needed. Updates will be executed by the Manager of Administrative Affairs and approved by the Housing Choice Voucher Program Director.

Complaints and comments regarding HCVP LEP services will be forwarded to the Manager of Administrative Affairs. There have been no language access complaints or grievances since the LEP Plan was first implemented in August 2005.

CMHA has access to an important local resource, The Spanish American Committee, which is located in the Ohio City neighborhood of Cleveland. CMHA may seek assistance and advice from the Spanish American Committee, when required, in providing services that meet the need of Hispanic families who are limited-English proficient.

ⁱ Source: Language spoken at home. 2006-2010 American Community Survey, 5-year Estimates.