



# **Housing Authority of San Angelo Limited English Proficiency (LEP) Plan**

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## **SECTION I: OVERVIEW**

The Housing Authority of San Angelo (HASA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). The HASA shall take reasonable steps to see that language services are provided according to the provisions in this plan. The LEP Plan shall apply to all of HASA's programs, services, and facilities, regardless of whether they receive Federal assistance or not.

It is the intent of the HASA, in providing language services to LEP persons, to achieve a balance that ensures meaningful access to programs and services while not incurring undue burdens on HASA resources.

HASA has designated its Deputy Director as its LEP Language Services Manager. This employee shall provide oversight for the implementation of the LEP Plan, coordinate delivery of LEP language services, ensure staff receives training on LEP procedures, and direct the ongoing monitoring and periodic assessment of the LEP Plan effectiveness.

## **SECTION II: DEFINITIONS**

**Interpretation** The immediate communication of meaning from one language (the source language) into another (the target language). The meaning is conveyed orally.

**Limited English Proficiency Person** Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Such person or persons may be entitled to language assistance at no cost to themselves with respect to a particular type of service. Because language, like culture, is closely connected to national origin, HUD's guidance emphasizes that failure to ensure LEP persons can effectively participate in, benefit from, or utilize federally assisted programs may violate Title VI of the Civil Rights Act of 1964 prohibition against discrimination on the basis of race, color, or national origin.

**Translation** The replacement of a written text from one language into an equivalent written text in another language. It is noted that some LEP persons cannot read in their own language and back up oral interpretation services may be needed. The meaning is conveyed from written text to written text.

## **SECTION III: DETAILED POLICY STATEMENT**

The HASA will evaluate the LEP Plan no less than every five (5) years. The plan includes the Four Factor Analysis used in Federal Guidance. This will be used to determine the appropriate language assistance services to ensure that persons with LEP have meaningful access to HASA programs, services, and activities. The four factors are:

- Factor 1: Determine the number or proportion of LEP individuals eligible to be served or likely to be encountered by the HASA;
- Factor 2: The Frequency LEP individuals come in contact with the program.

- Factor 3: The nature and importance of the program, activity, or service provided by HASA to LEP individuals
- Factor 4: Determine the resources available to assist LEP individuals.

**Factor 1: Determine the number or proportion of LEP individuals eligible to be served or likely to be encountered by the HASA**

This determination will be made based on U.S. Census Bureau data and language preference data compiled by the HASA from the U.S. Department of Justice (DOJ) LEP site. At the time of this LEP Plan review, HASA's jurisdiction covered the following counties: Tom Green, Irion, Sterling, Reagan, Sutton, Crockett, Coke, Menard, and Schleicher. All counties are considered in the statistics noted below.

The U.S. Census Bureau's American Fact Finder for the HASA jurisdiction provided the following statistics for the total population:

Race	Total	Percentage
White, Alone	127,246	91%
Black, Alone	5,745	4%
American Indian and Alaska Native, Alone	1,873	1%
Asian, Alone	1,976	1%
Native Hawaiian and Other Pacific Islander, Alone	251	0%
Two or More Races	3,344	2%

The U.S. DOJ LEP's Data and Language Map provides the 2015 statistics noted below for the HASA's jurisdiction. Overall, at the time of this plan review, the HASA's jurisdiction consisted of 7.8% of the population as considered LEP. The chart below includes the top two (2) percentages of languages according to this report. A determination as to whether five (5) percent of persons in HASA's jurisdiction speaks a specific language will trigger consideration of vital document translation.

Language	Total	Percentage
Spanish	9088	7.23%
Other Indo-European languages	294	0.23%

**Factor 2: The frequency LEP individuals come in contact with the program**

The necessary language services that are needed is determined by the frequency of contact for LEP persons, i.e. the more frequent the contact, the more likely the language services will be needed whereas, programs that only serve a LEP person one time or occasionally will be necessarily different. While less frequent contact may suggest a less intense solution, some services will likely be necessary for times when a LEP person occasionally seeks services.

The determination of frequency will be made by analyzing the data collected from the reports noted in Factor 1 above. The HASA will also retain copies of sign in sheets for reference and

analysis as well to project the anticipated number of contact points a client may have with the HASA. While this would be an estimated number, the HASA will use this data accordingly.

**Factor 3: The nature and importance of the program, activity, or service provided by HASA to LEP individuals**

HASA's recognizes that despite the intent to provide meaningful access to all participants and applicants, the availability of resources may be limited in some instances. Some programs and services provided may be more important and thus resources are more readily available. Regardless of this, the HASA will make every attempt to establish necessary services.

Furthermore, the HASA promotes the philosophy that housing is essential and important for all individuals. Thus, when a staff member engages in a discussion with a client regarding client rights to benefits, programs, or services offered by the HASA, the staff member will determine whether failure to provide language assistance would have an adverse effect on the client, to include a delay in services or other disparate impact.

**Factor 4: Determine the resources available to assist LEP individuals**

As identified in Factor 1 analysis, Spanish is the most commonly spoken language in HASA's jurisdiction for LEP individuals. HASA staff members who are verified bilingual and who agree to serve as oral interpreters and to translate documents will be used as available. Alternatively, the HASA will utilize procured vendors as professional, competent translators and interpreters. The HASA will seek out qualified vendors to translate vital documents as well as oral interpretation for languages not spoken by HASA staff members. Furthermore, reasonable steps shall be taken to accomplish this, but at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

Additionally, the HASA will attempt to establish partnerships with community organizations to provide volunteer interpreter services for HASA clients, as alternative when professional interpreters (procured vendors and HASA staff) are unavailable. The HASA will allow clients to waive their right to professional and/or volunteer language services so that clients may utilize friends or family members (who are not minors) as oral interpreters.

**SECTION IV: PROCUREMENT OF INTERPRETATION AND TRANSLATION SERVICES FOR LEP PERSONS**

The following methods of providing interpretation and translation services shall be considered and used based upon the assessment of need for the HASA:

1. HASA employees that are available and are skilled enough to interpret or translate will be utilized first. (Essential when accuracy and details are important or critical as the staff member is familiar with services provided).

2. Using telephone (or video conferencing) interpreter services. (Useful when prompt delivery of interpretation services is required and staff is unavailable).
3. Using translation services through Office products or online options to create required documents and forms. (Useful to minimize costs).
4. Using family members or friends when individuals waive their right to professional services for interpretation/translation. (Useful when language service needs are least important or informal).

The HASA will explore the most cost-effective means of delivering competent language services before limiting services due to resource limitations or concerns. In the process of deciding which services shall be provided, the HASA will document the process used in arriving at the determination of which services are to be provided to which groups if different from above.

## **SECTION V: LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and/or who has a limited ability to read write, speak, or understand English may be a LEP person and is therefore entitled to language assistance with respect to HASA programs and activities. HASA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. The staff will use the sign in sheets to identify if LEP services are needed. In cases that the LEP person's primary language is not spoken by any staff member, the HASA will use the Language Identification Flashcard from the U.S. Census Bureau to identify the language spoken/written by the applicant/participant. The HASA will assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients. The HASA will distinguish between language assistance provided in the form of written translations and oral interpretations.

### **Written Translations**

The HASA will consider the costs and benefits of translating documents for potential LEP groups, considering the expense of translating documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and other relevant factors. The HASA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group.

Based on the Four-Factor analysis, HASA translates vital documents to Spanish. A client may request oral interpretations of documents not translated. The HASA will require a client to certify that the client understood the document translated with the Translation Certification Document. The HASA staff member will explain that the written translations of HASA or HUD forms are not the official/legal version of the form. Vital document translations are used for the sole purpose of helping the LEP client understand the contents of the document. When a staff member

uses a vital document translation to help the client understand the information, the client will only sign documents and forms in the English version.

### **Oral Interpretations**

The HASA will provide interpreters, including bilingual staff and procured vendors in accordance with this plan. Written translation and verbal interpretation services will be provided consistent with the four-factor analysis detailed above. In cases of Informal Reviews/Hearings, a HASA staff interpreter may not be a subordinate to the HASA staff member rendering a decision on the client's hearing. The HASA will monitor LEP in accordance with the LEP Procedures.

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

### **SECTION VI: APPLICABILITY**

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