



Housing Authority of San Angelo Procedure Limited English Proficiency (LEP) Plan Procedures

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SECTION I: DATE OF IMPLEMENTATION, APPROVAL AUTHORITY

Effective June 6, 2025; Procedure Approval Authority: Executive Management

Overview

The objective of the Limited English Proficiency Plan Procedures (LEP Procedure) is to provide free language assistance for HASA clients under any of HASA's programs. The function of the LEP Procedure is to ensure HASA employees implement the LEP Plan, so that individuals needing language assistance will have meaningful access to the services, benefits, and programs provided by the HASA. Thus, HASA employees must adhere to the LEP Procedure.

SECTION II: AREAS OF RESPONSIBILITY

The following chart provides a scope of each department's responsibilities; these lists are not exhaustive:

Department	Responsibilities Under LEP Plan
Front Desk/Reception	Welcome all clients to HASA; determine if LEP services are needed including oral interpretation and written translation; notify of language preferences to managers; document in Lindsey software as LEP if not already identified as such.
Section 8/Housing Choice Voucher Program Property Management & Leasing Rapid Rehousing Program	Determine language preferences of existing clients and new admissions primarily utilizing the sign-in sheets during meetings; determine whether clients who meet in person/speak on the phone with department staff need translation or interpretation services; determine language services needed; update in Lindsey software as needed
Compliance	Review LEP Plan and Procedure compliance with federal regulations, state, or local laws and HUD guidance annually; provide LEP services as instructed; monitor LEP Plan and Procedure as needed.
Leadership Team / Managers	Provide new hire training on LEP Plan and Procedure within six (6) months of hire and every other year.

SECTION III: PROCEDURE DETAILS

How To Assist an LEP Client In-Person

Written Translations: Translation Protocol

Vital Documents: those forms or documents that are critical for ensuring meaningful access, or awareness of rights and services. HASA documents which have been identified as vital documents and translated from English to Spanish are listed on the LEP Vital Documents Chart.

Unless translated documents have been obtained from HUD resources, all other Vital Documents will be translated internally, if possible, using Office translation tool.

Vital document translations are used for the sole purpose of helping the LEP client understand the contents of the document. When a staff member uses a vital document translation to help a client understand, the client will only need to sign the English version. The signed English version is the official, legally binding document. The translated version is not considered official or legally binding. Staff will be asked to retain both versions in the file.

Interpreters will need to explain to the LEP client that:

- The translated version of the form is an accurate translation of the English version;
- The English version must be signed and is the only legally binding document.

The LEP client may notify the HASA employee that they do not want translated documents but just an oral interpretation of the form or document.

Oral Interpretations: Interpretation Protocol

The HASA will attempt to provide bilingual staff interpreter to provide free oral interpretation services to an LEP client. If a bilingual staff interpreter is unavailable to provide oral interpretation in the LEP client's preferred language, the HASA employee will provide the client with an interpreter through an approved vendor. The LEP client may also allow for use of electronic interpreters such as Google translate.

If the staff member determines that a delay would not adversely affect the client's rights to benefits, programs or services offered by the HASA, or if the interpretation telephone line is unavailable the staff member can explain the following alternatives:

- Client can wait to handle their business until a formal interpreter who can accommodate the client's language preferences can be located and scheduled, or
- Client can provide their own informal interpreter (family member, friend, etc. but not a minor) and sign a Voluntary Waiver of their right to free interpreter services offered by the HASA.

Sign-In Sheets for Client

The following steps describe the process regarding signing-in for services from the HASA:

- Receptionist will ask each individual to sign-in.
 - If during a scheduled group meeting, responsible HASA employee will ask each individual to sign-into the meeting.
- The receptionist or HASA employee interacting with the client may determine whether language services are needed by the language card and/or the sign in sheet.
 - The individual may self-identify, by writing on the sign-in sheet language column, that he/she requires oral interpretation and/or written translation of HASA documents.
 - If the client does not self-identify on the sign-in sheet, the receptionist can direct the individual to specify a language preference by pointing to the LEP language chart. If the client points to a specific language preference on the chart, the receptionist/employee should write-in the language preference on the sign-in sheet.
- Once the receptionist/employee confirms that the individual requires LEP services, the receptionist/employee must determine what services are needed, i.e. interpretation or translation. This will be dependent on the client's reason for visiting the HASA. Once a determination is made, the employee will follow the protocol outlined in these LEP Procedures.

How To Assist an LEP Client During a Telephone Conversation

If a HASA employee has telephone contact with a client that requires LEP services the HASA employee must follow the protocol under oral interpretation above.

SECTION IV: NOTICE OF RIGHTS TO LANGUAGE ASSISTANCE

Office Locations

The HASA has notices posted in the lobby of the main office, Desert Shadow's office, and Forest Park Community's office that explains in English and Spanish how to request language services. The Intake positions will also maintain the language identifying flashcards in case an additional language is needed.

Mail Correspondence

All correspondence mailed to HASA clients will include a statement explaining LEP services available. This will help to ensure that all clients receive notification of the LEP service offered.

Client Grievances

All HASA clients will be notified about the availability of grievance procedures which will be included on all reporting forms.

SECTION V: LEP PLAN AND PROCEDURE TRAINING AND DISTRIBUTION TO HASA EMPLOYEES

All regular HASA employees included in the chart under ‘Area of Responsibility’ section will be given a copy of the LEP Plan and Procedure at an LEP training to occur every two (2) years and within six (6) months of the hire date. This training workshop will be required for ongoing employment with the HASA. Therefore, attendance will be kept for which employees received the training. If an employee misses the scheduled training due to an absence for the work day, the employee will need to schedule a make-up workshop with the facilitator of the training.

To ensure compliance, all required employees will sign and submit the Receipt of LEP Plan and Procedure Signature Page to document receipt. This document will be maintained in employee’s file. HASA employees are also encouraged to suggest methods of improving the LEP Procedure while participating in these workshop trainings.

SECTION VI: MONITORING LEP PLAN AND PROCEDURE

Data from sign-in sheets at the front desk

Step 1: At the end of each workweek, the front desk staff must take the data entered onto the sign-in sheets (specifically regarding language preference) and input into a spreadsheet stored on the HASA Server or the staff member can scan and electronically store the sign in sheets in date order.

Step 2: The front desk staff uses the data entered into the database to generate a report of all individuals encountered during the work week.

Step 3: The front desk staff must submit the report or scanned sign-in sheets to the LEP Manager quarterly in March, June, September, and December.

Step 4: The LEP managers will maintain the data for three (3) years.

Data from sign-in sheets from scheduled meetings

Step 1: At the end of the meeting, the responsible staff member must take the data entered on the sign-in sheet (specifically regarding language preference) and input into the spreadsheet stored on the HASA server or the staff member can scan and electronically store the sign in sheet in date order.

Step 2-4: The staff member will follow the same steps outlined above for the front desk.

SECTION VII: MODIFYING THE LEP PLAN AND PROCEDURE

The LEP Plan will be reviewed no less than every five (5) years as part of the HASA’s 5-Year Plan process.

SECTION VIII: REFERENCES

The LEP Plan can be found on HASA's website: www.sanangelopha.com

APPENDIX

Appendix A, Vital Documents List

- Application
- HASA Authorization to Release Information
- HUD-9886A
- Reporting forms to include Certification Form, Re-Examination Forms
- Letters/Notices pertaining to denial or termination of services or benefits
- Letters/Notices that require a response
- Notices regarding the availability of free language assistance services