

Phelps County Public Housing Agency
Housing Choice Voucher Program
Limited English Proficiency Plan
September 2008

Elements of an Effective Limited English Proficiency Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP persons who need language assistance
2. Identifying ways in which language assistance will be provided
3. Training staff
4. Providing notice to LEP persons
5. The recommended method of evaluating accessibility to available services is the Four Factor Analysis.

These recommended plan elements have been incorporated into this plan.

Methodology for Accessing Needs and Reasonable Steps for an Effective LEP Policy

HUD guidance outlines **four factors** that should be applied to housing programs. The PHA will assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity or service provided by the recipient to the LEP community.
4. The resources available to the Phelps County PHA and the overall cost.

The Four Factor Analysis

This plan uses the recommended four factor analysis in considering the four factors above. Each of the following factors is examined to determine the level and extent of language assistance required to sufficiently ensure meaningful access to the Phelps County PHA housing programs.

Factor 1:

The Number or Proportion of Limited English Proficiency (LEP) Individuals to be Served or Likely to be Encountered

The Census Bureau has a range of four classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all'. For our planning purposes, we are considering people that speak English 'not well' or 'not at all' as Limited English Proficient persons.

The service area of the Phelps County Public Housing Agency, Housing Choice Voucher Program is the entire area of the counties of Crawford, Dent, Gasconade, Maries, Phelps, and Washington, with the exception of the city of Rolla, Missouri.

As of September 1, 2008 the HCVP has 721 voucher contracts out of a possible 756. Of these, .28% (2) are Hispanic families.

Table 1 shows the number and percent of persons in regard to their English Language skills for the six counties in the PHA’s jurisdiction, based on 2000 Census information. Less than one percent (315 people) of the population speaks English ‘not well’ or ‘not at all.’

Table 1: Limited English Proficiency Persons in the Phelps County PHA six county jurisdictions
Source: 2000Census

County	Populations 5 Years old and older	Number of Limited English Proficient Persons	Percent of Limited English Proficient Persons
Crawford	21,332	105	.50%
Dent	13,969	45	.33%
Gasconade	14,440	50	.35%
Maries	8,326	14	.17%
Phelps (not Rolla)	21,960	30	.14%
Washington	21,788	71	.33%
Total	101,815	315	.31%

Table 2 shows the actual numbers of LEP persons, by county and language group spoken at home, within the Phelps County PHA’s six counties. Crawford (C), Dent (D), Gasconade (G), Maries (M), Phelps (P) (excluding the city of Rolla) and Washington (W) counties.

Table 2

Language Spoken at Home

	Spanish						Indo-European						Asian and Pacific Islander						Other
	C	D	G	M	P	W	C	D	G	M	P	W	C	D	G	M	P	W	All
5-17 years old	57	45	10	21	37	34	8	4	31	9	28	9	5	5	5	0	20	0	17
18 years and over	269	109	76	55	187	199	87	69	269	58	237	45	27	7	10	6	120	49	417
Total	326	154	86	76	224	233	95	73	300	67	265	54	32	12	15	6	140	49	434

Source: 2000 Census

Since Phelps County PHA does not maintain statistics on ethnicities other than the information inputted on the HUD form 50058, 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. Census data for the Phelps County PHA six county jurisdictions indicate that in 2000, 97.3% of the population spoke only English and another 1% spoke Spanish at home. This accounts for 98.3% of the PHA jurisdiction. The remaining 1.7% of families speaking a language other than English at home was comprised of other Indo-European languages, Asian languages and 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’.

Factor 2:**Frequency of Contact with LEP Individuals**

The minimum frequency of contact for the total subsidy recipients includes initial application, voucher briefing, yearly annual re-exam and yearly annual inspection. Some participants may have one or more additional interims to report changes in income or family composition. In addition, some families received 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 transfer/port appointment or may have various questions regarding the program throughout the year.

Factor 3:**The Nature and Importance of the Program, Activity or Service Provided by the Program**

The Meramec Regional Planning Commission administers the Phelps County PHA. The mission of both, the PHA and MRPC, include cleaner, healthier and safer communities. This includes being a leader in providing safe, quality, affordable housing for low-income individuals and families of our six county area.

Compulsory activities include 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.

Housing is a basic human need, the lack of which can have serious or life-threatening implications for any individual. Phelps County PHA takes its responsibility in the housing of low to moderately low- income individuals very seriously and understands it is clearly important to the quality of life in our community.

Factor 4:**Resources Available to the PHA and Costs**

The PHA acknowledges that current demographic trends indicate the number of LEP persons may increase within the PHA's jurisdiction in the coming years. The PHA's jurisdiction currently has very few LEP persons (less than one half of 1%) and has very limited resources. However, the following resources are available to ensure that any LEP individual will have meaningful access to the Housing Choice Voucher Program:

- Staff will be made aware of the availability of LEP services.
- The PHA will provide written translation services provided by HUD.
- LEP individuals will be referred to community liaisons proficient in the language of the individual(s).
- The PHA will make "I Speak" cards available to LEP individuals.
- The PHA will post HUD form 928.1A (fair housing) sign in Spanish.
- The PHA will post on the HCVP PHA's website at www.meramecregion.org.

Language Assistance Provided

The PHA has two main ways to provide language services: oral interpretation or written translation. The correct mix should be based on what is both necessary and reasonable in light of the four factor analysis.

Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language. Translation means the written transfer of a message from one language into another language. The PHA will determine when interpretation and/or translation are needed and are reasonable. The PHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.

A person who does not speak English as his/her primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Phelps County PHA's programs and activities.

Considering the small number of LEP individuals in the PHA's jurisdiction and the limited financial resources, it is necessary to limit language aid to the most basic and cost effective services. Clients 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 the PHA. It is not the PHA'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.

Training Staff

The Housing Program Manager is responsible to provide training on the requirements for providing meaningful access to services for LEP persons. Staff requests for interpreting and translating services will be arranged by the Housing Program Manager.

Access to LEP Services

The Phelps County PHA LEP Plan will be made available to the public via the Phelps County PHA web page by February 2009.

The PHA will review and revise when events (2010 decennial census or other indication of increase of LEP persons) warrant.

