

IHFA Language Assistance Plan

Policies and procedures for providing access to IHFA programs, services and activities for persons with Limited English Proficiency (LEP).

'Good customer service is

Welcome

in any language.'

Pursuant to Title VI of the Civil Rights Act of 1964 and August 11, 2000 Executive Order 13166 (*Improving Access to Services for Persons with Limited English Proficiency*), IHFA must provide meaningful access to LEP persons and thus comply with Title VI regulations forbidding recipients of HUD funds from *"restrict[ing] an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program or from utiliz[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program...."*



Preface

This Language Assistance Plan represents an update, expansion and clarification of IHFA's policies and procedures with respect to individuals in our program and service area that are considered as Limited English Proficient, or LEP. This is a living document; as such we anticipate changes to its contents based on new information moving forward. We invite comments and corrections to improve the clarity and accuracy of the document itself, as well as to ensure the effectiveness of the policies and procedures covered in the following pages.

While this document may contain typographical or other errors, it represents IHFA's ongoing good faith efforts to provide exceptional customer service to all stakeholders.

Introduction

IHFA is committed to open communication and professionalism in serving all cultural groups within Idaho. We embrace diversity and promote inclusivity in the belief that through diversity come the resilience and creativity needed to make Idaho a better place to live for everyone. We recognize that all persons, regardless of linguistic background, deserve excellent customer service.

IHFA welcomes all minority language groups calling Idaho home to participate fully in our programs and services. By far the largest of these groups is made of Spanish-speaking individuals. Because we intend our programs and services to be easily accessible to all Limited English Proficiency (LEP) persons, the following considerations are provided:

- When contacting or visiting IHFA's main Boise office or our four regional branch offices (Coeur d'Alene, Lewiston, Twin Falls and Idaho Falls), persons with Limited English Proficiency (LEP) may either secure the assistance of an interpreter of their own choosing at their own expense, or they may request other arrangements for language assistance.
- IHFA will take reasonable steps to ensure that, where needed, interpretation and/or translation services are provided at a level of fluency, comprehension, and confidentiality appropriate to the purpose.
- IHFA has in place personnel capable of providing assistance in Spanish for our programs that directly serve the general public. For all vital document translation, IHFA's Public Affairs department shall coordinate translation. All other language assistance will be addressed as needed.
- Contacts with LEP individuals should be logged in IHFA's LEP Contact Tracker form; first, to document customer service provided to LEP populations and second, to inform resource allocation for interpretive and translation services as Idaho's population becomes more diverse.

Purpose (from www.hud.gov)

"On August 11, 2000, [Executive Order 13166](#), titled, "**Improving Access to Services by Persons with Limited English Proficiency**", was issued." Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to...federally conducted programs and activities by eligible LEP persons... Once finalized, such plans are to be filed with the Department of Justice as the central repository of agencies' plans." In compliance with Section 2 of Executive Order 13166, this Implementation Plan details the Department of Housing and Urban Development's initiatives and plans over the next twelve months to improve access to its federally conducted programs and activities by eligible persons with limited English proficiency (LEP)."

Background (from www.hud.gov)

“The general mission of the Department of Housing and Urban Development is to promote adequate and affordable housing, economic opportunity, and a suitable living environment for every American free from discrimination. HUD has six strategic goals to help in achieving its mission:

- Increase Homeownership Opportunities for low-and moderate-income persons, persons with disabilities, the elderly, ethnic and racial minorities, and families with limited English proficiency.
- Promote Decent Affordable Housing by expanding access to affordable rental housing, improving the physical quality and management accountability of public and assisted housing, and helping HUD-assisted renters make progress toward self-sufficiency.
- Strengthen Communities through improving economic conditions in distressed communities, making communities more livable, ending chronic homelessness, and mitigating housing conditions that threaten health.
- Ensure Equal Opportunity in Housing by resolving discrimination complaints on a timely basis, promoting public awareness of Fair Housing laws, and improving housing accessibility for persons with disabilities.
- Promote Participation of Faith-Based and Community Organizations by providing full and equal access to grassroots faith-based and other community-based organizations.
- Embrace High Standards of Ethics, Management and Accountability by rebuilding HUD's human capital and further diversify its work force, improving accountability, service delivery, and customer service of HUD and its partners, and ensuring program compliance.

HUD has many programs that assist in meeting the eight strategic goals. Among these programs are: (1) Office of Fair housing and Equal Opportunity; (2) Office of Community Planning and Development; (3) Office of Housing; and (4) Office of Public and Indian Housing. These four programs administer much of the approximately \$30 billion that is provided directly to State and local governments, Public Housing Agencies (PHAs), profit and non-profit organizations to implement critical housing and community development programs and activities. HUD wants to ensure that the programs and activities made possible through these resources are made available to the LEP population. Therefore, this Implementation Plan focuses on providing equal opportunity to persons with LEP.

Annual employee training

As part of our annual statewide employee meetings, all employees receive training in fair housing basics and our reasonable accommodation and LEP policies and procedures. As part of this training, employees review the following two documents:

- IHFA’s Commitment to Fair Housing and Customer Service
- 1-2-3 Service for LEP callers/customers (all IHFA employees)

IHFA's Commitment to Fair Housing and Customer Service

One of IHFA's core Principles and Values asserts that "we will serve our customers with dedication, courtesy, concern, respect, and responsiveness." The customer service practices below support our general goals of expanding housing choice for all Idahoans and compliance with the federal Fair Housing Act.

IHFA offers ongoing training to ensure all employees have the tools and knowledge to provide exceptional service to every customer. As IHFA and Idaho grow, it's important that our training focus reflects our dynamic customers and their increasingly diverse needs. While every employee understands the basic concepts, it's important to keep our attention on some easy-to-remember requirements:

- *Customer service is **welcome** in any language.* As Idaho's population becomes more diverse, the number of languages spoken increases. IHFA has several employees who are bilingual in English and other languages such as Spanish. To accommodate other language needs, we contract with Language Line to provide interpretation and translation services on demand. Talk with your department's manager immediately to make sure you know the protocol for handling non English-speaking callers or visitors.
- *IHFA provides equal access to our facilities, programs, services and events.* Management will consider any and all requests for **reasonable accommodations** (exceptions to our policies and procedures) that remove or minimize barriers involving disability or Limited English Proficiency. Any inquiry involving a reasonable accommodation request shall be handled as follows:
 1. *Make it clear that 'IHFA considers all requests for reasonable accommodation.'* Some callers may ask the same question (or a variation) multiple times; **never speculate** on potential outcomes of a request;
 2. *Ask that the request be made in writing if possible and confirm the customer's contact information for follow up. If the individual is unable or unwilling to submit the request in writing, offer to transcribe the request (read it back to them and confirm it's what they want);*
 3. *Forward the request to a supervisor or manager promptly, and confirm a course of action to respond to the request.*
- *Treat each customer the way you want to be treated.* The first step is to listen carefully to identify the need and/or question. Be patient, respectful and attentive. Then do your best to provide a timely and considerate response.
- *Provide the same level of service and detail to each and every customer.* Every caller and customer is unique. That being said, it is our duty to offer substantially equivalent information, services, and accommodation to customers presenting similar questions or requests.
- *Be professional at all times.* We all experience occasional contact with people who are frustrated, confused, or angry; they may also simply want to complain about IHFA or another stakeholder. Do your best to acknowledge their frustration without getting caught up in it, and try to determine how you can be of assistance. Once again, listening goes a long way. It may be necessary to offer to forward the person to a supervisor or manager.

See the reverse side for specific customer service resources and contacts.

1-2-3 Service for Limited English Proficient (LEP) callers/customers

Whether you encounter LEP individuals in person, by phone or via email, your first priority is to establish his or her interpretive needs. Spanish is the most common language other than English, although additional language groups are increasing, mostly in Southwest and South Central Idaho. For those not familiar with the characteristics of these language groups, it may be difficult to guess. Here are some things to remember.

Most callers can state their language need; for others, sometimes the best we can do is to list (slowly) the most common countries of origin or language groups currently being served by statewide resettlement agencies. Remember a few simple steps when you encounter an unfamiliar language.*

1. **‘What language, please?’** If he or she doesn’t reply, clearly list several country names or languages, pausing to give the customer a chance to respond. Local resettlement agencies suggest the following:

Languages	Pronunciation	Continent	Countries spoken
Kirundi	kih-roon-dee	Africa	Burundi
Mai-Mai	my-my	Africa	Congo
Kiswahili /Swahili	ki-swa-hee-lee	Africa	Burundi, Kenya,
French/Français	frahn-say	Asia, Africa	Congo, Burundi, Haiti,
Arabic	air-a-bic	Asia, Africa	Various
Burmese/Karen	bur-meez/kah-ren	Asia	Burma/Myanmar

2. **‘What is your name/phone number?’** Always verify a call-back number! This can be tricky depending on language levels; use Caller ID if possible, and/or ask for their name and telephone number. ‘Telephone’ is a pretty universal, and most folks are used to providing their name and number.
3. **‘Please wait.’** For phone calls, press the ‘Conference’ button on your phone once to get a new dial tone, dial **1-866-874-3972 (Language Line Services)**, and then press ‘Conference’ once more to bring the caller back on line and confirm they are still there. If the individual shows up in person, a speakerphone in a room with privacy works well. **IHFA’s Customer Account number is 540060.**
4. **Enter the appropriate PIN when prompted.** Refer to the *Quick Reference Guide* or other materials from Language Line. Use simple, short sentences and pause for translation/responses.

*The CIA World Factbook is a great source of information on different cultures and countries. If there are populations you are serving, it’s always a good idea to get to know them. You can link to the CIA description of the world’s main languages [here](#). The CIA library page is located at <https://www.cia.gov/library/index.html>

Glossary of Terms

LEP—Limited English Proficiency. LEP persons do not speak English as their primary language and have no ability or are limited in their ability to read, write, speak or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific. An individual may have sufficient language skills to communicate basic information (name, address, etc.) but may not have sufficient skills to communicate detailed information in English.

Language Barrier—Failure to plan for and accommodate LEP may prevent people from learning of housing and other opportunities or applying for and receiving such opportunities. LEP may keep people from learning about environmental or safety problems in the community and the means available for dealing with them. LEP can keep a client or tenant from understanding their rights and responsibilities and may prevent people from reporting housing discrimination which can hinder investigations.

Translation—Written language assistance provided by a translator, usually involving the translation of *vital documents*. Translation can range from the translation of an entire document to the translation of a short description of the document. The HUD LEP Guidance describes “safe harbor” for the translation of documents for LEP persons. (see Safe Harbor)

Interpretation—Oral language assistance provided by an interpreter either in-person or via a telephone interpretive service. The HUD LEP Guidance provides no “safe harbor” for the provision of interpretation services to LEP persons.

Vital Documents—Any document that is critical for ensuring meaningful access to the recipients’ major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is “vital” may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. For instance, applications for auxiliary activities, such as certain recreational programs in public housing, would not generally be considered vital. However, if the major purpose for funding the recipient were its recreational program, documents related to those programs would be considered vital. Where appropriate, recipients are encouraged to create a plan for consistently determining over time and across its various activities, what documents are “vital” to the meaningful access of the LEP populations they serve.

Safe Harbor—The “safe harbor” concept only applies to the translation of documents. If a recipient provides written translations when certain thresholds (below) are exceeded, this action will be considered strong evidence of compliance by HUD. Failure to provide translations does not mean there is a non-compliance. For instance, oral interpretation might be an acceptable way of providing access when the translation of documents becomes so burdensome as to defeat the legitimate objectives of a program. Other considerations are the importance of the service, benefit or activity, the nature of the information sought, and whether the proportion of the LEP persons served calls for written translations.

In many cases, use of the “safe harbor” would mean the provision of written language services when marketing to the eligible LEP population within the market area (see Service Area). However, when the

actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

Safe Harbor

Size of language group	Recommended provision of written language assistance
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 <i>and</i> more than 50 in number.	Translated vital documents.
More than 5% of the eligible population or beneficiaries <i>and</i> 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 <i>and</i> less than 1,000 in number.	No written translation is required.

Service Area

Sometimes used interchangeably with *eligible service area, geographic area, market area or target audience* in the HUD LEP guidance. The “safe harbor” evaluation will differ depending on the population the recipient is considering. When conducting outreach to the eligible population in the market area, the number and percentage of the eligible LEP population in that market area should be evaluated. When working with a recipient’s own program beneficiaries (e.g., residents of a specific housing development or applicants to the housing development), the number and percentage of LEP persons living in the housing and on the waiting list should be evaluated.

IHFA provides programs and services available to individuals and families across a variety of geographic areas within the state of Idaho. Depending on the program, this may include the entire state, or specific counties or jurisdictions within the state.

Language Assistance Resources

- **'I Speak'** language identification cards to identify specific languages (see Attachments). 'I Speak' cards can be downloaded at <http://www.lep.gov/ISpeakCards2004.pdf>
- **IHFA Staff** Several IHFA employees are fluent/bilingual in a variety of languages, primarily English and Spanish, but also include Czech, Bosnian, Serbian, Croatian, French, German and Basque.
- **Language Line – 1-877-261-6608.** This resource offers interpreter services for more than 150 languages. Use of the line requires setting up an account for billing the calls which are charged by the minute. In addition to interpreting for a customer who is physically present, it can also be used to place calls to LEP persons. Customer service is 1-800-752-6096, ext. 1. **Note.** Language Line is IHFA's primary contractor for interpretation. See **1-2-3 Service for LEP callers/customers (all IHFA employees)** above for more details.
- **Smartphone and online translation apps.** While not ideal, the availability of these resources provides a potential/partial/interim solution when no other options are available.

Other Online Resources

HUD sample forms and fact sheets available in various languages.

<http://www.hud.gov/offices/fheo/lep.xml>

Idaho Fair Housing Forum

www.fairhousingforum.org

Four-Factor Analysis

HUD’s guidance suggests that recipients of federal assistance prepare a four-part language needs self assessment for considering the following information:

1. Service Area Demographics.

Data availability and limitations. Traditionally, demographic information indicating ‘primary language spoken at home’ is provided by the U.S. Census, last completed in 2010. The most current datasets available are through the American Community Survey (2010-2014 Five-Year Estimates, and are further broken down to indicate the percentage of language speakers in a that speak English ‘very well’ or ‘less than very well.’ IHFA also relies at times on other data sources, including the Idaho Department of Commerce, Idaho Department of Education Title VI program, the University of Idaho Data Center, the Idaho Department of Transportation and the Idaho Office for Refugees.

As more detailed information becomes available, this section will be updated and expanded.

Persons 5 years and over that speak English either ‘not well’ or ‘not at all’ by primary language family (Idaho). This is a subset of the statewide data set based on the *Safe Harbor* triggers. *Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.*

Age/Primary Language	Number	Percentage*
5 years and over:	1,0483,151	
<i>Speak only English</i>	1,325,642	89.38%
<i>Speak Spanish:</i>	118,178	7.97%
Speak English less than "very well"	47,041	3.17%
<i>Speak Chinese*</i>	3,514	0.24%
Speak English less than "very well"	1,798	0.12%

*ACS references ‘Chinese’ in its dataset; Chinese is a broad term for a group of ten distinct— and in some cases mutually unintelligible—languages spoken throughout China. If any one of these distinct languages exceeds threshold for translating vital documents, IHFA will take appropriate action.

Based on prevalence of language other than English spoken ‘less than very well’ (Implying a need for interpretive and/or translation services) IHFA routinely provides outreach, marketing and key program materials in both English Spanish, although we provide interpretive and translation services in any language on request and as required.

IHFA provides a dedicated [web page](#) with a dynamic list of marketing and outreach documents in Spanish; in addition, vital program documents and legal notices of public hearings are made available in both English and Spanish.

***Top Five Idaho Refugee Languages.** *Source: Idaho Office for Refugees.*

Primary Language	Number	Notes
<i>Nepali</i>	739	<i>Resettlement agencies report higher English fluency among Nepali clients than other recently arrived refugee populations.</i>
<i>Arabic</i>	693	<i>Arabic speakers are represented primarily by refugees from the Middle East and several African nations.</i>
<i>Karen</i>	202	<i>Karen is spoken by the majority of Burmese refugees in Idaho</i>
<i>Farsi/Dari/Persian</i>	134	<i>Farsi or Persian is spoken by Iranian refugees, while linguistically related Dari is common among Afghan refugees.</i>
<i>Swahili</i>	108	<i>Swahili is common to Burundi, the Democratic Republic of Congo, and many eastern African nations.</i>
<i>Somali</i>	NA	<i>A number of Somali refugees are locating in Ada County.</i>

*The vast majority of refugees currently resettling in Idaho were located in Ada and Canyon counties. A secondary resettlement area is based in Twin Falls. IHFA has requested updated numbers through 2015 from the Idaho Office for Refugees.

2. The frequency with which LEP persons come into contact with the program.

LEP contact tracking system (agency wide)

All contacts with LEP individuals will be logged in IHFA's *LEP Contact Tracker* form; first, to document customer service provided to LEP populations and second, to inform resource allocation for interpretive and translation services as Idaho's population becomes more diverse. This primary program data augments Census and other sources. Key customer service staff are trained to record each LEP contact to determine language, interpretive and informational needs of caller as well as the resolution of each contact.

The most current statistics from the LEP Contact Tracker are as follows:

IHFA Program/Department

Homeownership Lending	10	3.2%
Rental Assistance Programs (IHFA)	289	91.5%
Housing Counseling	4	1.3%
General housing question/unspecified	7	2.2%
IHFA policies or public comment process	0	0%
Housing Information Hotline	2	0.6%
Non-IHFA program or service	4	1.3%
Human Resources	0	0%

Primary customer language

Spanish	268	84.8%
Bosnian	8	2.5%
Arabic	17	5.4%
Burmese	0	0%
Kirundi	3	0.9%
Swahili	0	0%
French	0	0%
Somali	2	0.6%
Serbo-Croatian	0	0%
Chinese	0	0%
Korean	0	0%
Thai	0	0%
Russian	7	2.2%
Unknown/other	10	3.2%

Contacts by County

Ada	12	3.8%
Adams	0	0%
Bannock	3	0.9%
Bear Lake	0	0%
Benewah	0	0%
Bingham	2	0.6%
Blaine	1	0.3%
Boise	0	0%
Bonner	0	0%
Bonneville	140	44.3%
Boundary	1	0.3%
Butte	0	0%
Camas	2	0.6%
Canyon	5	1.6%
Caribou	0	0%
Cassia	2	0.6%
Clark	0	0%
Clearwater	0	0%
Custer	0	0%
Elmore	0	0%
Franklin	0	0%
Fremont	0	0%
Gem	0	0%

Gooding	1	0.3%
Idaho	2	0.6%
Jefferson	1	0.3%
Jerome	6	1.9%
Kootenai	6	1.9%
Latah	0	0%
Lemhi	1	0.3%
Lewis	0	0%
Lincoln	0	0%
Madison	1	0.3%
Minidoka	1	0.3%
Nez Perce	0	0%
Oneida	0	0%
Owyhee	0	0%
Payette	0	0%
Power	10	3.2%
Shoshone	0	0%
Teton	3	0.9%
Twin Falls	107	33.9%
Valley	1	0.3%
Washington	0	0%
Out of State	8	2.5%

3. The nature and importance of contact with the program, activity or service provided by the program.

IHFA has distinct business activities with direct-to-public components. While all contacts are important, IHFA considers any communication that has a bearing on the client's ability to secure or retain housing as having the highest importance.

A. Mortgage Banking (statewide)

- a. Mortgage lending,
- b. Finally Home[®] Homebuyer Education, and
- c. Borrower Counseling

B. Community Housing Services

- a. Rental Assistance (34 of 44 counties). IHFA is the Public Housing Agency for 34 counties in the state of Idaho; the predominant LEP contact with our Rental Assistance staff comes through our Idaho Falls and Twin Falls branch offices. These branch offices employ staff that are fluent/bilingual in English Spanish, Serbian, Bosnian, and Croatian.

- b. Housing Information and Referral Center/Housing Hotline (statewide). Interpretive services are available on request.
 - c. Housing Assistance Guide. This collected of frequently asked questions is available online and by request in English, French, Spanish and Arabic.
 - d. Rental Housing Locator Service (statewide). This service is marketed in both English and Spanish, and the web site is available in both English and Spanish, with a Google Translation feature available for other language needs.
- C. HOME: Single-Family Homebuyer Activities
All direct customer transactions are handled by participating lenders.
Bilingual forms (English and Spanish)
- Borrower's Affidavit
 - Seller's Disclosure Form
 - Occupancy Certification
 - Note – Loan Document
4. **Resources available to IHFA.** IHFA has seven Spanish speaking staff in the Boise office, representing Community Housing Services and Homeownership Lending/Customer Service. Current staff have functional fluency in Czech, German and French. As mentioned above, Branch offices include fluent/bilingual staff in English, Spanish, Croatian, Bosnian and Serbian.

IHFA contracts with The Language Line to provide translation and interpretive services as needed for those language groups outside the scope of our staff. IHFA Branch and Boise offices utilize a language identification card and/or poster that allow LEP individuals to indicate the language they speak. Once they have identified their language, staff simply conference or three-way call with a Language Line Interpreter.