

LANGUAGE ACCESS PLAN AT A GLANCE



CHA

CHICAGO HOUSING
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Executive Summary

CHA's Office of Diversity was tasked to manage translation and interpretation services in January of 2015. Following a series of internal and external input sessions, the Office of Diversity developed a Language Access Policy, which was approved by CHA's Board of Commissioners in April of 2015. The Board approved Language Access Policy is an integral part of CHA's Language Access Plan (LAP).

CHA's Language Access Plan (LAP) includes a policy and a procedures section. In an effort to ensure standardized processes, the implementation and enforcement of the CHA's LAP is overseen by CHA's Office of Diversity.

CHA, in accordance with federal, state and local laws will continue to take reasonable steps to ensure meaningful access to its programs by Limited English Proficiency (LEP) persons.

Following months of discussions and a comprehensive review of data and best practice research, CHA developed new language access procedures that include the following¹:



- Standardize and automate translation and interpretation services
- Designate a Language Access Liaison for every CHA department
- Release an Annual Language Access Compliance Report
- Continue collaboration with the Office of the Mayor's Office of New Americans and diverse groups of community, legal and civic leaders to ensure successful implementation and quality service delivery

CHA has been implementing these new procedures and continues to work with community organizations and Language Access Liaisons to identify opportunities to enhance services provided to LEP individuals².

Upon the release of the first Annual Language Access Compliance Report, CHA will translate vital documents following the guidance provided by the Department of Housing and Urban Development (HUD) for translations. CHA allocated \$60,000 of the 2016 Budget to translate vital documents.

For vital documents geared toward residents of Chicago, CHA will translate in the top five languages, identified by the Office of the Mayor's Office of New Americans, spoken in Chicago, which are Spanish, Polish, Chinese, Hindi and Arabic.

¹ Bridging the Language Gap. Recommendations from Chicago's Language Access Advisory Committee

² Ibid



Background on the Language Access Plan

CHA is sensitive to the needs of CHA applicants, CHA participants and residents of the City of Chicago at large who are LEP individuals. CHA values diversity and is committed to providing equal opportunity in its outreach practices and decisions. CHA follows all applicable federal, state, local laws and ordinances prohibiting discrimination³. CHA's LAP takes reasonable steps to ensure LEP persons have meaningful access to CHA's programs and services. As part of CHA's overall efforts to implement policies and programs that are sensitive to the needs of Chicago, while remaining compliant with HUD regulations, the Office of Diversity held eleven (11) stakeholder input sessions to ensure the proposed content of CHA's LAP ensured persons, who as a result of national origin do not speak English as their primary language and who have limited ability to speak, read, write or understand, have meaningful access to CHA's services and programs⁴.

Input session attendees were tasked with evaluating both short and long-term implementation of the proposed language access procedures. CHA, at the Mayor's direction, has focused on three critical issues: increasing accessibility to CHA programs for LEP residents, improving service delivery and efficiency, and ensuring alignment with the City's Language Access Plan(s).

Why does Chicago Need Language Access?

Chicago has over 400,000 residents that are considered LEP. This means that approximately 16.1% of the population in Chicago may face significant language barriers when accessing City services or programs⁵. Refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI, VII and/or VIII of the Civil Rights Acts of 1964 and 1968. For CHA, meaningful access is free language assistance in accordance with federal guidelines. To comply with these guidelines CHA is required to provide appropriate translation and interpretation services based on a four-factor analysis and develop a LAP. CHA expects to release an Annual Language Access Compliance Report that will reflect the outcomes of the HUD required four-factor analysis.

CHA provides affordable housing to more than 59,000 households at CHA properties or in the private market with Housing Choice Vouchers (HCV), while supporting vibrant, healthy

³ Title VI of the Civil Rights Act of 1964; Section 188 of the Workforce Investment Act; Title VII of the Civil Rights Act of 1964; Title VIII of the Civil Rights Act of 1968

⁴ HUD's LEP Final Guidance.

⁵ Bridging the Language Gap. Recommendations from Chicago's Language Access Advisory Committee



communities in neighborhoods throughout Chicago. The LEP communities served by CHA include CHA applicants, CHA participants/residents and HCV owners. The resources available to serve LEP households in CHA's programs include but are not limited to: bilingual staff, professional interpretation and translation services, over 50 Language Access Liaisons and the Office of Diversity.

What is the Four-Factor Analysis?

CHA is required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens. CHA will conduct assessments at a program level that balance the following four factors⁶:

1. The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available and costs incurred by CHA.

The outcomes of this analysis will be released on an annual basis.

Implementation of CHA's LAP

To ensure policy compliance, the Office of Diversity will work with CHA's Language Access Liaisons, the Office of the Mayor's Office of New Americans and other key stakeholders on the implementation of the Language Access procedures.

⁶ HUD's LEP Final Guidance.

Services in the Language Spoken by LEP Populations

CHA staff, including all front-line staff, should provide services in any non-English language spoken by an LEP individual through either bilingual staff or an interpreter (either in-person or via telephonic interpretation line). CHA will either translate or interpret vital documents by following HUD's guidelines:

- a) If 1,000 or more households OR more than 5% of total households (and more than 50 in number) of eligible population are LEP households, then CHA will translate vital documents
- b) If more than 5% of households are less than 50 LEP households in number of the total eligible population then, CHA will translate written notices of right to receive free oral interpretation of documents
- c) If 5% or less of total eligible population is less than 1,000 in number then written translation is not required

Examples:

Scenario A: 35,000 HCV households

- a) If 1,000 or 1,750 (5%) of HCV households are LEP households who speak Russian, then CHA would translate HCV vital documents in Russian

Scenario B: 300 HCV Households

- b) If 18 (6%) of HCV household are LEP households who speak Russian and since these LEP households are less than 50, then CHA would translate written notices of right to receive free oral interpretation of documents

Scenario C: 300 HCV Households

- c) 12 (4%) of HCV households are LEP households who speak Russian and since these LEP households are less than 5% of the total and less than 1,000 in number, then CHA would not be required to translate documents

For any outreach efforts impacting the City at large, CHA will translate vital documents in the City's top five languages: Spanish, Chinese, Hindi, Polish, and Arabic.

Departmental Language Access Procedures

CHA provides some services and information in multiple languages, but currently, these services do not meet a consistent standard for language accessibility. By requiring all CHA departments to implement language access procedures, CHA will increase the





quality and reliability of services provided to LEP individuals. All CHA departments that provide front-line services should ensure meaningful access to such services by following established protocols. If an LEP person calls any CHA numbers, they must be served by a bilingual staff or assisted via the telephonic interpretation line. If an LEP individual interacts with CHA staff in person he/she must be assisted thru a bilingual CHA staff or a professional interpreter. Although every department has the flexibility to determine appropriate language assistance for their individual department's service populations, CHA staff is expected to comply with CHA's

LAP. In addition, while implementing a program of language assistance, each department should ensure that they⁷:

1. Follow CHA's guidance, identify and translate⁸ all vital documents provided to or completed by CHA applicants and/or CHA participants;
2. Include interpretation services, such as telephonic interpretation services and utilizing bilingual staff, particularly for public-facing positions;
3. Train front-line staff and managers on CHA's language access procedures;
4. Post signage that explains the availability of free interpretation services in conspicuous locations;
5. Establish an appropriate monitoring and measurement system regarding the provision of department language services and the quality of such services and vendors;
6. Create an appropriate public awareness strategy for the agencies' service populations; and
7. Develop and share best practices for language access within and between CHA's Departmental Language Access Liaisons.

Departmental Language Access Liaisons

Each department has designated a Language Access Liaison to oversee the creation and implementation of a department-specific internal language access procedures and, when appropriate, the Language Access Liaison should also be responsible for collecting department data and monitoring compliance⁹. Language Access Liaisons should meet regularly to share best practices, resources, and technical assistance. As of August 2015, CHA has designated and trained 50 Language Access Liaisons.

⁷ Bridging the Language Gap. Recommendations from Chicago's Language Access Advisory Committee

⁸ All written translation requests must be approved by the Office of Diversity

⁹ Bridging the Language Gap. Recommendations from Chicago's Language Access Advisory Committee

Language Access Compliance Report

CHA plans to submit to HUD and publish an annual, public compliance report that measures information pertaining to the outcomes of CHA's Language Access Plan on an annual basis.

Collaboration with External Stakeholders

The Office of Diversity will continue to work closely with the Office of the Mayor's Office of New Americans and Community Based Organizations to ensure quality delivery of services and implementation of CHA's Language Access Plan. Regular updates by the Office of Diversity will keep stakeholders informed on performance and compliance, allowing them to share successes, react to challenges, and make adjustments as needed¹⁰.



¹⁰ Ibid

Acknowledgements

The Office of Diversity thanks the input received by various key stakeholders during the development and implementation of the CHA's Language Access Plan¹¹.

Office of the Mayor's Office of New Americans

HUD's Office of Fair Housing and Equal Opportunity

CHA's Executive Office

CHA's Language Access Liaisons

Latino Policy Forum, including Housing Acuerdo members

Chinese American Service League

South Asian American Policy & Research Institute

Latinos United Community Housing Association (LUCHA)

Greater Avondale Chamber of Commerce
St. Joseph Services

Central State SER

Casa Central

Claretian Associates

Heartland Alliance

Erie Neighborhood House

Poder

National Learning Center

The Resurrection Project

Spanish Coalition

Polish American Chamber of Commerce

Japanese American Service Committee

European American Association

Indo-American Center

Northside Community Development Corp

El Hogar del Nino

United African Organization

Hispanic Housing Development Corp

Korean American Women in Need

Refugee One

Cabrini Green Legal Aid

Chinese Mutual Aid

Woods Fund

Illinois Coalition for Immigrant and Refugee Rights

Asian Americans Advancing Justice – Chicago

Polish American Association

Mexican American Legal Defense and Educational Fund

¹¹ Ibid