

## Summary

**Name of Project:** Housing Authority of Billings' Plan for providing access to benefits and services for Persons with Limited English Proficiency (LEP).

**Introduction:** Section 2 of Executive Order 13166 requires Federal agencies and recipients of Federal financial assistance to develop and implement a plan for improving access to services and participation in federally conducted programs and activities to LEP individuals. The Housing Authority of Billings is committed to improving language accessibility of its federally conducted programs and activities and to take reasonable steps to provide meaningful access to LEP individuals using a "4-factor" analysis. Factors that we consider when determining what constitutes reasonable steps to ensure meaningful access to LEP individuals are the:

- Number or proportion of LEP persons in the eligible service population;
- Frequency with which LEP individuals come into contact with the program;
- Importance of the service provided by the program; and
- Resources available to the recipient.

**Background:** The Housing Authority of Billings has taken a proactive approach to implementing a comprehensive plan to provide access to program benefits and services to LEP individuals.

**Vision Statement:** The Housing Authority of Billings provides effective, efficient and equitable service to the public we serve. Members of the public have access to our services regardless of their ability to speak, read or write English. Service delivery options are available to LEP individuals, enabling them to communicate effectively with the Housing Authority of Billings in person, over the phone, in writing or through electronic media.

**Policy:** The Housing Authority of Billings has taken a proactive approach to ensure access to the programs we administer to all of the American public. Our policy ensures that individuals have access to our programs and services regardless of their ability to communicate with us in English. The Housing Authority of Billings will provide and interpreter free of charge, to any individual requesting language assistance or, when it is evident that such assistance is necessary to ensure that the individual is not disadvantaged. We do not require individuals needing language assistance to provide their own interpreters.

**Qualified Interpreter Services -** The Housing Authority of Billings uses qualified interpreters available in our community. If the LEP individual prefers to use his/her own interpreter, such as a family member, friend, or

third party, the Housing Authority of Billings will determine whether the interpreter meets our requirements. Generally, we will not permit a child under age 18 to serve as an interpreter due to the nature and complexities of our business processes.

**Public Information** – The Housing Authority of Billings recognizes the value of public information to educate, improve access to our services, address LEP concerns, promote program integrity and build public confidence in the programs we administer. The Housing Authority of Billings contracts with the US Department of Housing and Urban Development (HUD) to administer various programs and will utilize all materials available from HUD that are produced in languages other than English to provide this information to LEP individuals.

**Written Communications** – In order to facilitate access to our programs and to improve administrative effectiveness, the Housing Authority of Billings will use public information materials, notices and form letters produced and provided by HUD due to the nature and complexities of our business processes. We will use the following criteria:

- Number of LEP beneficiaries/applicants;
- Literacy level in the non-English language;
- Anticipated demographic growth; and
- Cost effectiveness.

**Section 1. Demography: Number of Proportion of LEP Individuals.**

The Housing Authority of Billings will begin collecting language preference of our applicants and program participants. Capturing language preferences will ensure that we:

- Know the preferred languages of the individuals we serve;
- Know where the language demands are located; and
- Make informed staffing and resource allocation decisions.

**Section II. Frequency of Contact with the Program.**

The Housing Authority of Billings will collect information as to the number of LEP individuals that come into contact with our programs through the main office and our off-site complex: in person, by mail, phone or internet, to apply for housing assistance, request services or ask questions about the programs we administer.

**Section III. Nature and Importance of the Program.** In 1937, the U.S. Housing Act established programs to help low-income Americans with their housing needs. Thus, for LEP individuals, the Housing Authority of Billings plays a critical role in helping provide housing assistance and linkages to other housing and self-sufficiency services.

**Section IV. Resources** The Housing Authority of Billings directs resources to LEP activities in the form of:

- Professional networking with other agencies such as Montana Legal Services (3 Spanish speaking staff members and located directly across the street), Montanan Migrant Council, and the foreign language department of Montana State University Billings;
- Providing for paid third-party interpreters;
- Providing written materials in languages other than English. This is limited to those documents currently produced and published by HUD.