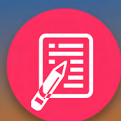




U.S. Department of Housing and Urban Development

LANGUAGE ACCESS PLAN

2021 - 2026



A Message from the Secretary



I am pleased to present the 2021 – 2026 Language Access Plan (Plan) for the U.S. Department of Housing and Urban Development (HUD). This Plan outlines HUD’s commitment to providing meaningful access for people with limited English proficiency (LEP), including immigrants, across all programs, services, and activities conducted by this Agency. Providing language access for persons with LEP is critical to HUD’s commitment to advancing equity, providing support to underserved communities and vulnerable populations, and combating discrimination based on national origin. HUD’s language assistance services create meaningful access to vital documents in multiple languages, services, and programs such as natural disaster assistance, affordable housing opportunities, pathways to homeownership, and increasing awareness of individuals’ fair housing rights. These services

lift language barriers for individuals with limited English proficiency who seek HUD’s assistance.

HUD adopts this Language Access Plan in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. It outlines our responsibilities, policies, and strategies for providing language assistance services to persons with LEP. Moreover, it applies to all HUD program offices and the Offices of the Secretary and the Deputy Secretary. I intend for the Plan to evolve as the Agency learns more about its many interactions with persons with limited English proficiency and identifies the best methods for providing language assistance services.

To provide the most effective language assistance services, HUD will continue to identify critical points of interaction with the non-English speaking public, assess limited English proficient communities’ particular language assistance needs, and determine how each program office can ensure timely, meaningful access to HUD programs, services, and activities for persons who speak little to no English. The Plan also provides a general framework within which HUD program offices may develop more effective solutions to providing language assistance services.

I am committed to implementing use of the Plan at all levels within HUD so we can remove barriers to access for persons with LEP, and for all HUD customers, in all HUD programs, services, and activities.

Sincerely,

A handwritten signature in blue ink that reads "Marcia L. Fudge". The signature is written in a cursive, flowing style.

Marcia L. Fudge
Secretary

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I. Language Access Plan Overview

Vision Statement

The U.S. Department of Housing and Urban Development (HUD) shall provide meaningful access to equitable, timely, and quality language assistance services to individuals with limited English proficiency (LEP) in its programs and activities consistent with Executive Order 13166 (EO 13166), Improving Access to Services for Persons with Limited English Proficiency, 65 Fed. Reg. 50, 121 (Aug. 16, 2000).

Policy Statement

It is HUD's policy to provide timely, meaningful access for persons with LEP to all agency programs, services, and activities. Individuals who have a limited ability to read, speak, write, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.¹

HUD uses annual Congressional appropriations to procure language assistance services with companies certified to conduct business with the federal government. Federal acquisition strategies are applied in awarding language assistance service contracts. This procurement allows HUD personnel to provide free language assistance services to persons with LEP whom they encounter or whenever an individual with LEP requests language assistance services. All personnel will inform members of the public that HUD will provide language assistance services to persons with LEP free of charge.

HUD's Language Access Plan (LAP or Plan) will be publicly available on HUD's Office of Fair Housing and Equal Opportunity's (FHEO) homepage at <https://www.HUD.gov/fairhousing>, HUD's intranet Language Assistance Services webpage, and the Limited English Proficiency website on <https://www.LEP.gov>. HUD's LAP will also be readily accessible on HUD's FHEO homepage at [HUD.gov](https://www.HUD.gov) in the foreign languages listed in Element 1 of this Plan. Public comments will be received via email at LEP@hud.gov. HUD continuously seeks to improve and expand the services it provides to enable persons with LEP to communicate with HUD in person, over the phone, in writing, or through electronic media. HUD's published LEP policy and procedures align with the strategic goals outlined in the Agency's [Strategic Plan](#).² These goals include:

- **Advancing Economic Opportunity**
HUD shall provide language assistance services to persons with LEP to reduce barriers to affordable housing, rental assistance, and economic opportunities.
- **Protecting Taxpayer Funds**
HUD will develop or enhance existing policies and procedures to implement cost effective strategies in meeting the language access needs of the people it serves.

¹ Although HUD's Language Access Plan focuses on providing language assistance to persons with LEP, HUD will apply certain aspects of its Language Access Plan to ensure effective communication with individuals with disabilities, as required by Section 504 of the Rehabilitation Act of 1973. More information on HUD's obligation to ensure effective communication with individuals with disabilities is available on [FHEO's website](#).

² Updates to the Agency's Strategic Plan after the publishing of this document will be included as an addendum to the LAP.

- **Streamlining Operations**

The Agency will streamline its operations to strengthen coordination among staff in Headquarters and the Field to ensure HUD personnel are empowered to meet the needs of persons with LEP.

HUD will re-evaluate the LAP every five years to ensure alignment with the Agency's overall strategic plan, to maintain compliance with the requirements set forth in Executive Order 13166 and other LEP related guidance, and to ensure that the LEP communities have continued meaningful access to HUD's programs, services, and activities.

Purpose and Authority

This Plan establishes a strategy for ensuring meaningful access by persons with LEP to HUD administered programs and activities in accordance with Executive Order 13166. The Order set two overarching goals for each federal agency: (1) implement a system by which persons with LEP can meaningfully access the agency's services consistent with, and without unduly burdening, the fundamental mission of the agency, and (2) ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their applicants and beneficiaries with LEP.

Section 2 of Executive Order 13166 requires Federal agencies to develop and implement a plan for improving access to services and participation in federally conducted programs and activities for persons with LEP. In compliance with Section 2 of the Order, this Plan details HUD's initiatives and plans to improve access to its federally conducted programs and activities by eligible persons with LEP.

On February 17, 2011, Attorney General Eric Holder issued a memorandum on the subject of the [Federal Government's Renewed Commitment to Language Access Obligations Under Executive Order 13166](#) (AG Memo), which requested that each Federal agency conduct a self-assessment of LEP services, to update its plan to improve the language accessibility of its "federally conducted programs and activities,"³ and to take steps to implement the plan. The Department of Justice (DOJ) also provided the "[Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs](#)," with additional guidance. HUD used this tool to draft HUD's Plan. This Plan will also be informed by the information HUD received from conducting self-assessments of its LEP services and input from outside stakeholders, such as persons with LEP or groups that work with LEP communities.

II. Plan Development and Implementation

The goal of all language access planning and implementation is to ensure that federal agencies provide meaningful access to all agency services to persons with LEP. As the AG Memo notes, this requires ensuring effective communication at all points of contact between a person with LEP and HUD. This Plan will also help HUD in developing

³ Executive Order 13166 covers all "federally conducted programs and activities." All federal agencies must design and implement a federally conducted plan to ensure meaningful access for persons with LEP to all its federally conducted programs and activities.

language access policy directives, an implementation plan, and procedures to effectuate the elements of this Plan.

Implementation of HUD's LAP will include its dissemination in Headquarters and to all regional and field offices to inform HUD staff of the elements and action steps outlined in the LAP. The Assistant Secretary of FHEO or designee shall be responsible for staff training, self-assessments, maintaining accessibility of internal language assistance services, and providing notice of availability of language assistance services to external stakeholders through outreach initiatives, social media, and web page presence.

Each HUD program office must identify its vital documents and in what languages those documents should be translated. Each HUD program office must also examine the services they provide, identify any language access barriers to accessing those services, and develop and implement a system to provide meaningful access to those services for persons with LEP. This LAP is designed to assist program offices in identifying the language services they need and evaluate the translation and interpretation resources available to help persons with LEP access a program office's benefits, programs, services, information, or other operations.

III. Language Access Working Group

On January 22, 2007, HUD published its "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," 72 Fed. Reg. 2731, (Final Guidance) to help recipients of federal financial assistance take reasonable steps to meet their regulatory and statutory obligations to ensure that persons with LEP have meaningful access to HUD programs and activities. In 2007, HUD chartered the Language Access Working Group ("LAWG" or working group) which met on a quarterly basis and was responsible for planning and implementing the Agency's language access activities. This working group was comprised of representatives from each of HUD's program offices. Since then, HUD has proactively implemented a comprehensive plan for increased access to its programs and services to persons with LEP. As a result of the AG Memo's reemphasis on LEP services, HUD escalated oversight responsibility of LEP services to the Deputy Secretary. HUD's Deputy Secretary designated its authority of responsibility for LEP services to FHEO which also includes programmatic policy and budgetary oversight. FHEO continues to lead the collaboration on this effort.

HUD will reconvene the LAWG, conduct periodic self-assessments of current LEP services, and will update this Plan, as necessary. The responsibilities of the working group will include establishing timeframes, objectives, and benchmarks corresponding to their respective program areas to address the appropriate element and action steps identified in this Plan. The LAWG consists of representatives designated by each of HUD's program offices' senior leadership listed below. The LAWG may also include representatives from the Office of the Secretary and the Office of the Deputy Secretary, as necessary.

- Chief Financial Officer
- Chief Information Officer
- Community Planning and Development
- Congressional and Intergovernmental Relations
- Departmental Enforcement Center
- Equal Employment Opportunity
- Fair Housing and Equal Opportunity
- Field Policy and Management
- General Counsel
- Ginnie Mae
- Healthy Homes and Lead Hazard Control
- Housing
- Assistant Secretary for Administration
- Office of Economic Development
- Office of Faith – Based/Neighborhood Partnerships
- Office of Hearings and Appeals
- Office of the Inspector General
- Policy Development and Research
- Public Affairs
- Public and Indian Housing
- Small and Disadvantaged Business Utilization

The working group will meet regularly to research and review the Agency's language access program. They will develop and lead Agency-wide language access initiatives and collaborations, including those designed to leverage resources and improve both HUD and recipient services for persons with LEP. The workgroup will report its findings and submit recommendations for improvements to the executive leadership team.

While HUD currently contracts with other language assistance providers, HUD will conduct outreach and explore the possibility in partnering with federal agencies to further expand HUD's language assistance services.

IV. Elements and Action Steps

The Agency's language access policy is defined in eleven elements that are essential for a language access plan and are vital to developing reasonable steps to provide meaningful access to HUD programs, services, and activities. HUD's Language Access Plan also identifies specific steps that HUD offices must take to implement the Agency's policy at each program level. The following elements shall be implemented by HUD to ensure effective communication between HUD personnel and persons with LEP.

- ELEMENT 1: Assessment: Needs and Capacity
- ELEMENT 2: Delivery of Services
- ELEMENT 3: Oral Language Assistance Services
- ELEMENT 4: Written Translations
- ELEMENT 5: Notification of the Availability of Language Assistance
- ELEMENT 6: Staff Training
- ELEMENT 7: Assessment: Access and Quality
- ELEMENT 8: Stakeholder Consultation
- ELEMENT 9: Digital Information
- ELEMENT 10: Grant Assurance and Compliance
- ELEMENT 11: Acquisition Planning Compliance

Element 1 – Assessment Needs and Capacity (Forward Thinking)

HUD regularly assesses whether the needs of current and potential program participants are met and works to identify the agency's capacity to meet these needs in accordance with the elements outlined in this plan. These self-assessments assist the agency in identifying language barriers that may delay effective oral and written communication between the agency and persons with LEP. FHEO collected language data from the U.S Census Bureau's American Community Survey (ACS) to identify the most encountered languages when providing housing assistance services throughout HUD's nationwide footprint. This data assisted HUD in determining the extent to which services are needed in various languages, to ensure HUD is meeting the needs of the persons with LEP whom it serves.

Four Factor Analysis

The Agency's Plan is based on the four-factor analysis outlined in the Final Guidance. HUD will utilize this analysis to determine the appropriate language assistance services to ensure that persons with LEP have meaningful access to the HUD programs, services, and activities. These four factors are:

Factor 1: Determine the number or proportion of LEP individuals in the eligible service population.

HUD uses various internal reports to determine the number or proportion of persons with LEP eligible to be served, likely encountered through program delivery, or those who are likely to be impacted by HUD programs and activities but have not contacted HUD. These methods include, but are not limited to, collecting and analyzing demographic data; reviewing local housing markets and census tracts that surround minority concentrated areas for the languages primarily spoken in each geographical area; and input from outside stakeholders, such as persons with LEP and groups that work with the LEP communities. This analysis resulted in the development of a language matrix that enabled the Agency to determine the top language needs that HUD personnel may encounter by region and state. HUD updates its language matrix annually as an addendum to the LAP to capture any changes in demographic data which is based on the ACS and decennial census and the methods mentioned above.

A recent self-assessment and review of the language matrix confirmed that the non-English languages listed below are the most frequently encountered and vary greatly by region and state.

- Spanish
- Chinese (including Mandarin, Cantonese)
- French (including Cajun)
- German
- Vietnamese
- Arabic
- Tagalog (including Filipino)
- Korean
- Afro-Asiatic (including Amharic, Somali)
- Portuguese

Additional languages identified across several regions and states included: Hindi, Russian, Haitian, Dutch, Hmong, and Italian.

HUD's language assistance services are request driven, in which persons with LEP seeking information about HUD programs and services contact HUD personnel to request interpretation and/or translation services. For the individuals who are likely to be impacted by HUD programs and activities but have not contacted HUD, the Agency is developing a 'HUD Speaks' campaign that informs LEP communities of HUD's capability

to interact and communicate with persons with LEP. This campaign's outreach efforts targets both internal and external stakeholders through various communication platforms and channels.

HUD also works with program offices to translate vital documents based on the needs and capacities of the agency. To assist with prioritizing which documents will be translated into which languages, HUD will begin reviewing and analyzing data collected by contract interpreters to determine the nature and frequency with which the documents are needed for translation.

Factor 2: The frequency LEP individuals come in contact with the program.

Persons with LEP contact HUD in person, by mail, phone, or internet to request HUD services, file enforcement actions, or ask questions about the programs the Agency administers. To determine the frequency of persons with LEP that come in contact with HUD programs, services, and activities, the Agency collects the preferred language data on individuals' requests for services and use the information gathered from the translation and interpretation contractors to determine the frequency of contacts, type of language assistance services needed, and the languages being requested. HUD's reporting mechanisms include information captured through its online tracking system (LEP SharePoint site) and reports generated from its interpretation and translation contractors.

Factor 3: The nature and importance of the program, activity, or service provided by HUD to LEP individuals.

To determine the nature and importance of HUD programs, activities, or services provided to persons with LEP, the Agency identified the negative impacts on persons with LEP of not being able to access these benefits. Using this factor, HUD will look at its programs, services, activities, and vital documents to determine the translation and interpretation services that the Agency will provide. Specifically, focus will be placed on the translation of brochures, forms, and other information materials that provide information about and access to the agency's housing programs and services.

Many of HUD's program offices administer numerous programs that provide funds and services directly to state and local governments, Public Housing Agencies (PHAs), and for-profit- and non-profit organizations to implement critical housing and community development programs and activities. HUD wants to ensure that the programs, services, and activities made possible through these offices are made available to the LEP communities. For instance, persons with LEP also interact directly with HUD programs through filing fair housing complaints, receiving homeownership counseling, and acquiring and maintaining residency with HUD-funded recipients, which all can be fulfilled in non-English languages. For persons with LEP who seek HUD's housing and services, it is essential that HUD program offices continue to identify forms, documents, and other informational materials that play a critical role in ensuring that HUD provides equal and quality housing opportunities and sustainable communities to persons with LEP.

Factor 4: Determine the resources available to assist LEP individuals.

To determine the resources available to assist persons with LEP, the Agency explored the most cost-effective means of delivering competent and accurate language services and secured Agency-wide contracts for its interpretation and translation needs throughout national headquarters, regional, and local field offices. HUD's existing Language Assistance Services contract includes requirements for linguists' certifications, experience, and education. HUD has implemented the following actions to provide resources needed to assist persons with LEP.

- Hiring and training bilingual staff where bilingual skills are needed;
- Providing contracted third-party oral telephonic interpretation services at no charge to the person with LEP;
- Providing contracted written translation services to produce non-English language materials; and
- Training our network of public-contact employees on the available HUD language assistance services.

Action Steps:

FHEO or its designee will:

- a. Conduct annual or biannual assessments of ongoing language access needs and the comprehensiveness and effectiveness of the services being provided.
- b. Identify gaps where language assistance services are inadequate to meet LEP needs. Identify and take specific steps at all office locations to enhance language assistance services.
- c. Contract with qualified and professional linguists that meet HUD language assistance service needs based on extensive experience, education, and training certifications. FHEO will establish safeguards in the LEP contracts to ensure quality assurance that include a multi-tiered review process.
- d. Use data resources, such as U.S. Census data (e.g., American Community Survey), when program-specific data is unavailable, to evaluate the extent of need for language assistance services in particular languages or dialects at the national and regional level.
- e. Analyze LEP data from customer satisfaction surveys and program reviews. This feedback will be considered when appending language need assessments to the LAP.
- f. Research new procedures and practices proven to enhance the provision of more efficient language assistance services and share such practices throughout the Agency.

- g. Update the language matrix annually as an addendum to the LAP to capture any changes in demographic data.
- h. Review policies for the recruitment, hiring, and assessment of bilingual and multilingual applicants. This review includes the need to further outline the hiring strategy for assessing applicants' proficiency and competency in the identified foreign language(s).
- i. Explore the need for establishing the criteria for bilingual staff to be eligible to act on behalf of the Agency. These criteria should consider experience, education, professional training and certifications, staff's understanding of professional and ethical obligations as an interpreter or translator for the Agency, and a template that records the certified bilingual staff's encounter with persons with LEP.⁴
- j. Train public-contact employees on language access policies and procedures, including how to access language assistance services to communicate and interact with persons with LEP, interpreters, and translators.

Element 2 – Delivery of Services

HUD staff can access HUD Language assistance services via the HUD Language Assistance Services webpage, which provides information on the HUD Interpretation Line, demographic analysis tools, and other language assistance resources. Persons with LEP access HUD programs and services through HUD grantees and funding recipients, such as public housing authorities, local governmental agencies, and community organizations.

HUD regional and field offices will develop strategies tailored to the needs of the LEP communities they serve to provide efficient and effective language assistance services. Through a variety of outreach activities, regional and field offices will also create and maintain customer-centric working relationships with diverse LEP populations and the local organizations and institutions that serve them. HUD has also identified and translated vital documents and other informational material that can be accessed by persons with LEP through the agency's websites, HUDClips and the LEP Translated Documents page.

Action Steps:

FHEO or its designee will:

- a. Regularly monitor the efficacy of services provided and share effective practices with executive leadership.
- b. Collect data to identify language needs demographically and the languages services required at various service delivery contact points.
- c. Establish policies and guidelines for identifying the language needs of persons with LEP to improve services.

⁴ [Template for Record of Contact with persons with LEP.](#)

- d. Review and collect data from HUD's interpretation line to determine the proportion of which various languages are being requested and the areas where services in these languages are most needed.
- e. Re-examine data collection methods to capture LEP population data accurately and fully.

Element 3 – Oral Language Assistance Services

HUD provides oral language assistance (such as qualified interpreters) in both face-to-face (onsite oral interpretation and sign language) and telephone encounters to facilitate access to HUD programs and improve administrative effectiveness. The oral telephonic interpretation service allows a HUD employee to communicate with a person with LEP, at no charge to them, in more than 125 languages. This service is available 24 hours a day, 7 days a week, and 365 days a year. HUD is currently working to train staff on these LEP services so that employees can appropriately assist persons with LEP.

Action Steps:

FHEO or its designee will:

- a. Continue managing a program that ensures persons with LEP are provided oral language assistance services in accordance with this plan.
- b. Maintain and monitor the internal webpage that provide resources available to HUD staff.
- c. Continue the dissemination of the HUD Language Resource Guide to HUD staff.
- d. Continue the coordination of routine marketing of available LEP services to HUD staff.
- e. Continue sharing information about HUD's oral language resources across the Agency as appropriate.
- f. Continue ongoing training of HUD staff on available oral language resources as needed.

Element 4 – Written Translations

HUD must provide written translations of vital documents and important information to ensure meaningful access and equal opportunity to participate in HUD programs, services, and activities. The definition of a vital document is provided in Appendix A, along with examples of documents that are considered by the agency to be vital. Once a program office identifies its vital documents, it must also prioritize the translation of the documents. HUD currently prioritizes the translation of written communications, such as public information materials, notices, forms, and letters using the following criteria:

- Document must be a HUD vital document. Examples include, but are not limited to, the following:
 - Model leases and addendums;
 - Disaster planning formation forms;
 - Complaint, consent, release or waiver forms;
 - Claim or application forms;
 - Mortgagee letters, notices, forms;
 - Conditions of settlement or resolution agreements;
 - Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the person with LEP; and
 - Notices regarding the availability of free language assistance services for persons with LEP.
- Document has public impact.
 - Various forms of outreach materials. Examples include, but are not limited to, the following:
 - Public awareness campaigns
 - Brochures
 - Posters
 - Flyers
 - Announcements
 - Notices
- Expansion of translated material due to a change in demographics.

After a document has been deemed vital and the criterion for prioritizing translation is fulfilled, the program office must consider having the vital documents accessible in the most frequently encountered non-English languages as listed in Element 1. A request for translation can be submitted by HUD staff through the Agency's internal LEP SharePoint site.

HUD translated materials in the more preferred foreign languages are also accessible to the public via HUDClips and on HUD's LEP Translated Documents webpage.

Action Steps:

FHEO or its designee will:

- a. Continue managing a program that ensures persons with LEP are provided written language assistance services in accordance with the agency needs, capacity, and this Plan.
- b. Maintain and monitor the availability of HUD's technology for HUD staff to request document translation.
- c. Identify materials available in non-English languages, inform the agency of such materials, and consider revising as needed to ensure quality and accuracy.
- d. Establish a storage space that retains previously translated vital documents.
- e. Continue to contract with qualified linguists that meet HUD language assistance service needs based on extensive experience, education, and training certifications.
- f. Perform periodic review of the safeguards included in the LEP services contracts to ensure quality assurance that includes a multi-tiered review process.
- g. Maintain and monitor the internal HUD webpage that lists resources available to HUD staff.
- h. Continue the dissemination of the HUD Language Resource Guide to HUD staff.
- i. Continue the coordination of routine marketing of available LEP services and share information about HUD's written translation language resources across the Agency as appropriate.
- j. Continue ongoing training of HUD staff on available written translation language resources as needed.
- k. Continue identifying and translating all documents that are determined to be vital by the respective program office.

Element 5 – Notification of the Availability of Language Assistance at No Cost

To address the needs and capacity noted in Element 1, HUD will ensure meaningful access by providing notification to current and potential program participants with LEP seeking information on HUD programs, services, and activities that language assistance services are available at no cost. Notifications may include, but are not limited to, multilingual posters, signs, brochures, materials distributed to the public, electronic forms on HUD's website, and other vital documents.

Action Steps:

FHEO or its designee will:

- a. Develop and implement a strategy for notifying persons with LEP who contact or are contacted by the agency that language assistance is available to them at no cost. This strategy is a component of the 'HUD Speaks' campaign that is currently under development.
- b. Utilize various methods and networks to ensure that the agency's target audiences are aware that language assistance services are provided to them at no cost. Highlight the availability of information materials in languages other than English on HUD's website(s) and ensure outreach materials inform persons with LEP about the language assistance services that are available free of charge.
- c. Distribute and make available resources, such as HUD's [Limited English Proficiency Frequently Asked Questions](#) and HUD's ["Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons"](#) to current grantees, housing providers, contractors, vendors, and the public.

Element 6 – Staff Training

HUD has committed the needed resources and will provide employee training as necessary to ensure staff understands the agency's LEP policies and procedures. This training helps ensure that all HUD employees are aware of the resources available, the procedures to access these resources (e.g., interpreters, bilingual staff, translation services, telephonic interpretation, on-site interpretation, sign language, and Braille), and the HUD points of contact for technical assistance. These efforts assist staff to effectively communicate and interact with persons with LEP. During new employee orientations, HUD provides training to employees on LEP services, such as interpretation and translation policies, how to access the services, and who to contact for additional information about the services. Since 2016, every new HUD employee has received information on available LEP services. In addition to the new employee orientations, HUD provides training to current staff, especially those in public-contact positions, on the procedures for accessing HUD's language assistance services when encountering oral and written communications in non-English languages.

Action Steps:

FHEO or its designee will:

- a. Ensure that the Agency continues its commitment of adequate resources in training HUD staff that are selected to implement this plan for their respective program offices.
- b. Continue to train staff on the policies and procedures of the agency's language assistance program and the use of the available resources to provide language assistance to persons with LEP.
- c. Advance the language assistance service program by expanding the types of training resources made available to HUD staff.
- d. Improve the dissemination of training materials that assist staff in providing meaningful access for persons with LEP.
- e. Provide ongoing staff training, especially for those in public-contact positions, on when and how to access and utilize oral and written language assistance services, how to work with interpreters and translators, and how to commission technical assistance.
- f. Prepare an annual training schedule to increase awareness of the agency's language assistance program. This schedule lists trainings that are to be conducted in each fiscal year, focusing on offices with public-contact positions.

Element 7 – Assessment: Access and Quality

HUD will regularly assess the accessibility and quality of language access services and activities for persons with LEP. Ensuring persons with LEP receive quality and accurate language access services is critical to providing meaningful access to the Agency's programs, services, and activities.

HUD will take reasonable steps to ensure that all vendors providing language services include quality assurance and performance standards in the contracts for their services. The language assistance contract includes requirements of providing evidence of linguists'/interpreters'/translators' foreign language proficiency, professional certifications, educational background, and work experience; a Quality Control Plan that details the contractors' methodology for recruiting qualified personnel; and a Quality Assurance Surveillance Plan that allows the agency to evaluate the contractor's performance in meeting standards identified in the contract. The following criteria are taken into consideration to ensure access and quality to language assistance services:

- HUD vendors are given a glossary of terms that are used within HUD to ensure consistency.
- HUD vendors must understand and follow confidentiality, impartiality, and ethical rules to the same extent as Agency staff.

- HUD will contract with qualified and professional linguists that meet HUD language assistance service needs based on extensive experience, education, and training certifications.
- HUD staff will monitor and track all feedback received regarding the quality of HUD contracted linguists to ensure vendors compliance with HUD requirements and policies.
- HUD's translations are contractually performed by certified linguists. The use of or reliance on free or automatic translation services, such as Google Translate, is not a best practice and should not be used for translation purposes. Outreach and training efforts have increased staff's awareness of language assistance services which eliminates the use of online translation services.

Every five years HUD's Language Access Working Group will evaluate and update this Plan, and its policies and procedures to ensure the language access program continues to effectively maintain language accessibility to persons with LEP. Any updates made within the five-year timeframe will be recorded as an addendum to the LAP and then incorporated at the scheduled evaluation period. HUD shall maintain notices on the internal HUD website informing employees about the availability of translation and interpretation services, and ensure information is updated to reflect the most recent data from the U.S. Census Bureau's ACS.

Action Steps:

FHEO or its designee will:

- a. Regularly assess the language assistance program and taking the necessary steps to improve the quality and accuracy of services provided to persons with LEP.
- b. Collect and track Agency LEP data at the national, regional, and local levels to determine the needs of the community and to allocate resources accordingly.
- c. Identify best practices for continuous quality improvement regarding its language assistance services.
- d. Implement methods for measuring improvements in access to the agency's language assistance services.

Element 8 – Stakeholder Consultation

HUD's internal stakeholder communities consist of HUD program offices and other federal partners. FHEO's Education and Outreach Division has the responsibility for: (1) coordinating language access services by providing customer service and technical assistance to HUD staff and the public; (2) ensuring language access services are available to assist HUD staff that communicate and interact with persons with LEP; and (3) securing qualified and reputable HUD contracted vendor(s). In accordance with this Plan, HUD shall consult with its stakeholders to identify language assistance needs of

persons with LEP, implement the most effective language access strategies, and obtain information to conduct assessments of customer needs, agency capacity to meet those needs and accessibility of LEP services as outlined in Element 1.

FHEO works with program offices to ensure vital documents are translated and accessible to the public via HUDClips. Additionally, persons with LEP and HUD recipients can request information be provided in the language they read, write, speak, or understand best. The agency promotes its language access services nationally to HUD staff through available internal communication outlets.

HUD will also conduct outreach and consultations with outside stakeholders, such as persons with LEP and groups who work with the LEP communities, for their evaluation of the LAP and to gain their assistance in the continued development of the LAP.

Action Steps:

FHEO or its designee will:

- a. Identify opportunities to include stakeholder involvement in developing policies and procedures to encourage access to HUD programs, services, and activities.
- b. Consult stakeholders to assess the accessibility, accuracy, cultural appropriateness, and overall quality of HUD's language assistance services.
- c. Share HUD's approved LAP and resources with stakeholders and solicit feedback.
- d. Research outreach efforts to persons with LEP and their representative organizations in gathering feedback about the effectiveness of the Plan's strategy in providing meaningful access to HUD administered programs and activities and collecting their recommendations to further develop the LAP.
- e. Explore methods to address the accessibility of HUD information by persons with LEP. These methods will capture data on the experience of persons with LEP in accessing HUD conducted and assisted programs, services, and activities.
- f. Research the intake and complaint process for LEP related issues.
- g. Assess external facing systems to determine the existence of an LEP component.
 - i. Analyze the incorporation of LEP accessibility for HUD systems that lack an LEP component.
 - ii. Analyze the need for expanding LEP accessibility in HUD systems with an existing LEP component.

Element 9 – Digital Information

When evaluating existing and emerging technologies, HUD considers the needs of persons with LEP, the resources available to meet those needs, and the effect technology can have on the LEP population. To ensure persons with LEP have access to digital information, HUD is currently exploring cost-effective options for updating the existing IT infrastructure to improve the accessibility of HUD's translated materials on its website.

Action Steps:

FHEO or its designee will:

- a. Contingent upon Element 8 Action step f., HUD will explore strategies for making publicly available online information accessible to persons with LEP in accordance with assessments of LEP needs and agency capacity.
- b. Consider opportunities to leverage social media to increase awareness of language assistance services and products available in non-English languages to persons with LEP.
- c. Explore strategies to display links on the Agency's website to indicate that documents are also available for viewing or downloading in languages other than English. Whenever practicable, the text displayed for these links should be written in the non-English languages available.

Element 10 – Grant Assurance and Compliance

Grantees receiving federal funds must comply with federal civil rights laws and provide written notice of their legal obligation and compliance with regulations as they relate to language access. Program reviews can present opportunities for reviewers to determine if recipients are complying with program and civil rights regulations. As a best practice and to assist grantees in meeting their legal obligations, HUD recommends that grantees complete a four-factor analysis to ensure all activities conducted and any information materials developed on behalf of the agency are accessible to LEP communities. To help ensure recipients of HUD funding meet their program and civil rights obligations, civil rights guidance is included in grant announcements, requirements, and policies.

Action Steps:

FHEO or its designee will:

- a. Research policies and procedures to ensure grantees comply with federal civil rights laws and regulations.
- b. Ensure that civil rights laws and regulations are included in all HUD program grants and documents to ensure grantees comply with their civil rights obligations.
- c. Provide links to resources and technical assistance documents on the Agency's program website(s).

Element 11 – Acquisition Planning Compliance

HUD program offices play an integral role in establishing an effective foundation for providing housing services that meet the needs of LEP communities, but also supports the Agency's mission, performance goals, and objectives. Program offices and internal stakeholders must take affirmative steps to ensure LEP policies and requirements are integrated into the Agency's acquisition actions. Specifically, the Agency is responsible for ensuring that all laws, executive orders, regulations, and other applicable procedures are followed to confirm sound business decisions are made in meeting the government's contractual obligations. The Agency must establish an effective foundation for acquisitions by adding standard language to all contracts that fully outlines the organization's requirements in providing access to persons with LEP. Through a centrally coordinated acquisition strategy, the Agency is better supported to fulfill its legal responsibilities in providing effective and efficient communication with persons with LEP and sets the stage for crafting an acquisition in which the performance goals of the contractor and the government are in sync. HUD grantees are also required to take reasonable steps to ensure meaningful access for persons with LEP pursuant to Title VI of the Civil Rights Act of 1964.

Action Steps:

FHEO or its designee will:

- a. Research policies and procedures to ensure that all HUD acquisition plans and strategies comply with laws, executive orders, regulations, and other applicable LEP requirements.
- b. Review current standard contractual language to ensure its adherence to Executive Order 13166 to be included in all HUD acquisition actions.
- c. Ensure that all grants and acquisitions actions in coordination with the responsible offices, to include safeguards to improve translation accuracy.

Appendix A: Definitions

Bilingual/Multilingual Staff – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language as authorized by his or her component.

Interpretation – The act of listening to a communication in one language and orally converting it to another language while retaining the same meaning.

Language Access – Is achieved when persons with LEP can communicate effectively with HUD employees and contractors and participate in HUD programs and activities.

Language Access Program – An array of language assistant services that are managed and coordinated by HUD to allow persons with LEP to receive equivalent information and access to HUD programs, services, and activities.

Language Assistance Services – Oral and written language services needed to assist persons with LEP to communicate effectively with staff, and to provide persons with LEP with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Agency.

Persons with Limited English Proficient (LEP) – Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. persons with LEP may be competent in English for certain types of communication, but still be LEP for other purposes.

Meaningful Access – Language assistance that results in accurate, timely, and effective communication at no cost to the person with LEP. For persons with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

Preferred/Primary Language – The language that a person with LEP identifies as the preferred language that he or she uses to communicate effectively.

Program or Activity – The term “program or activity” and the term “program” mean all the operations of the Agency.

Program Office – Program Office refers solely to headquarters HUD Operating Divisions (such as Community Planning and Development, FHEO, Housing, Public and Indian Housing) and Support Divisions (such as Chief Human Capital, Public Affairs). Operating Divisions focus on specific programs and activities as authorized by Congress. Support Divisions serve in a coordinating role for the Agency.

Qualified Interpreter – An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or is authorized to do so by contract with the Agency.

Translation – The replacement of written text from one language into an equivalent written text in another language. Note: HUD's translations are contractually performed by certified linguists. The use of or reliance on free or automatic translation services, such as Google Translate, is not a best practice and should not be used for translation purposes. Outreach and training efforts have increased staff's awareness of language assistance services which eliminates the use of online translation services.

Vital Documents – Paper or electronic written material that contains information that is critical for accessing a component's program or activities or is required by law. Vital documents include, for example: applications, model leases, disaster planning formation, consent, and complaint forms; notices of rights and disciplinary action; notices advising persons with LEP of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services.

Appendix B: Additional Resources

Executive Order 13166 (<https://www.lep.gov/executive-order-13166>)

Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons – (<https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf>)

Template for Record of Contact with Persons with LEP – HUD staff only
(https://hudgov.sharepoint.com/:b:/s/FHEO/OPLIO/FHEOEducationOutreach/EfW_o3chMedEj39bEmx9NOoBJ0rRg3CEaGws40opxXn4Ow?e=SXbCDI)



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<https://www.hud.gov/fairhousing>