

Language Access Plan (LAP) for Grand Traverse Band Housing

Introduction and Purpose

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", Grand Traverse Band of Ottawa and Chippewa Indians Housing Department has established the following LAP to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our agencies. An "LEP individual" is defined as "an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English."

The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across beneficiaries. This is essential to our mission to provide and promote, safe, adequate and affordable housing opportunities for GTB Tribal Members. To prepare for the development of this plan, we conducted a Four-Factor Analysis which balanced the following factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which the LEP persons come into contact with the agency;
3. The nature and importance of the program, activity, or service provided by the agency;
4. The resources available and costs to the recipient.

Persons Charged with Implementing the Plan

The Occupancy Specialist will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, this individual will be charged with maintaining and updating this plan as the need for changes arises. The individual will report to the Housing Department Manager and will need to coordinate with the Grand Traverse Band Tribal Manager's office in order to carry out the directives established by this plan.

Identification and Assessment of LEP Communities

In order to identify LEP individuals in our community, we consulted data from the Data Explorer on the Networks Northwest website. Based on this data, we have identified LEP populations in our community to be persons who speak Spanish (1.49% of population), Asian dialects (.24% of population), ...and English (97.15% of population). More specifically, beneficiaries of Grand Traverse Band Housing Project #2 consist of a significant representation of English speakers (98.15% of beneficiaries) and Spanish speakers (1.2% of beneficiaries).

As our community evolves over time, we will continue to monitor shifts in our population's demographics through (annual/biennial/other) assessments to ensure that we are adequately tracking LEP representation in our jurisdiction. We will also work to identify LEP individuals in our normal encounters with the public by (may include others not listed here):

- Assuming LEP if communication seems impaired;
- Responding to individual requests for language assistance services;
- Relying on self-identification by the non-English speaker or LEP individual;
- Asking open-ended questions to determine language proficiency;
- Using “I Speak” language identification cards or posters;
- Collecting and recording primary language data from individuals when they first engage with our programs and services.

Language Assistance Services

It is our understanding that these LEP individuals may interact with our staff in a number of ways (may include others not listed here):

- Participation in competitive programs;
- Outreach programs;
- Hotlines or information line calls;
- Public meetings and hearings;
- Public access to agency websites;
- Written materials or complaints;
- Agency brochures.

Due to the variety of encounters that LEP individuals may have with our agencies, a variety of language assistance services will be provided and advertised to these individuals. To determine the extent of language assistance services provided, we relied on our Four-Factor Analysis and identified the following groups as meeting the 1,000 or 5% LEP threshold for the provision of language assistance services (list as many as applicable):

- Spanish (1355, 1.49% of population)

For these LEP populations, both oral and written language assistance services will be provided.

Oral Language Assistance

Oral language assistance may be necessitated by encounters with LEP individuals either over the phone, in person, or at public hearings. When one of these encounters occurs, staff members will carry out the following protocol:

For communication over the phone:

The staff member will first make an effort to identify the primary language of the individual. If that staff member is approved as bilingual in the individual’s primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will transfer the call to another staff member who has been approved as bilingual, as listed in the Staff Directory. If no bilingual staff member is available to assist the individual, then a (telephone language translation service (e.g., 3-1-1 service);

approved volunteer from the community; interpreter for hire; etc.) may be used to communicate with the LEP individual.

For communication in person:

The staff member will first make an effort to identify the primary language of the individual, using an "I Speak" language card if necessary. If that staff member is approved as bilingual in the individual's primary language by the agency, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will contact another staff member who has been approved as bilingual, as listed in the Staff Directory, to come and assist the individual. If no bilingual staff member is available to assist the individual, then a (telephone language translation service (e.g., 3-1-1 service); approved volunteer from the community; interpreter for hire; etc.) may be used to communicate with the LEP individual.

For public hearings:

In all public notices of hearings, we will announce in the languages previously identified that an approved interpreter will be provided at the hearing upon advance request. A phone number will be provided in the notice for LEP individuals to call and request the interpreter.

Written Language Assistance

Written language assistance may be necessitated for a number of documents, notices, advertisements, forms, etc. "Vital documents" will be translated proactively and made accessible to the LEP communities previously identified. Documents will be classified as "vital" by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences associated with the document, and organizational resources. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Documents not considered vital will be available for oral or written translation upon request. Translated documents will also be accompanied with the following disclaimer:

"We are providing the translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."

In addition to vital documents, all notices of public hearings will include a section with key information (date, time, location, and subject matter) translated into the primary languages of the LEP communities previously identified.

Guidelines for Interpreters and Translators

While no formal certification is required for interpreters, translators, or staff members listed in the Staff Directory as bilingual, individuals providing interpretation or translation services must:

- Be proficient in and able to communicate information accurately in both English and the other applicable language;

- Understand agency-specific terminology;
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator;
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

LEP individuals may bring another individual to provide interpretation who has not been approved for formal interpretation services by the agency. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided;
- Use a formal interpreter instead of the informal interpreter, especially if the subject matter of the encounter may be prone to conflicts of interest;
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need.

When working with an interpreter, formal or informal, agency staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed;
- Briefly explain to the interpreter technical terms that may come up during the communication;
- Avoid the use of acronyms, double negatives, and contractions;
- Speak in short sentences that contain one idea at a time;
- Talk to the applicant and not to the interpreter;
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.

Providing Notice of Language Assistance Services

To ensure that members of LEP communities are aware of the free language assistance services provided to them, the following marketing and outreach steps will be taken (may include others not listed here):

- Provide "I Speak" language identification cards to front office staff;
- Include non-English instructions on telephone menus;
- Place translated materials in conspicuous locations describing different services;
- Update non-English content on the agency/program website;
- Distribute translated materials to schools and community organizations that explain how to access language assistance services;
- Publish notices in non-English media about programs and services offered;
- Provide notification of services with (application, certification, marketing, other) materials.

Training Staff on LEP Policies and Services

All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of New Employee orientation and refresher training will be provided periodically at staff meetings. After completion of the training, staff should understand:

- Their obligation to provide meaningful access to information and services to LEP individuals;
- The protocol for handling various encounters with LEP individuals, as established by this plan;
- How to use the Staff Directory to identify approved bilingual staff members;
- How to access translated materials and interpretation services for provision to LEP individuals.

Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals. In order for a staff member to be approved as bilingual, they must pass a standardized language proficiency exam (or some other assessment of proficiency).

Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the Occupancy Specialist will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, they will make use of the following mechanisms (may include others not listed here):

- Survey staff on how often language assistance services are used and how they could be improved;
- Conduct customer satisfaction surveys of LEP individuals;
- Observe and evaluate agency interactions with LEP individuals;
- Solicit feedback from community-based organizations and other stakeholders;
- Keep current on community demographics by engaging with local resources;
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- Monitor the agency's response rate to suggestions or requests by LEP individuals;
- Maintain a record of available services for LEP individuals and the frequency of their use;
- Maintain a record of funds and staff time spent on language assistance services.

Adopted:

8/12/24



Date Adopted

Housing Manager Signature Attest