

STAR, Inc., Lighting the Way...

Language Access Plan (LAP)

Introduction and Purpose

STAR, Inc., Lighting the Way...(STAR) is committed to complying with all civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI), which requires us to make sure individuals with limited English proficiency (LEP) have meaningful access to our transportation, programs and activities. The term LEP does not refer to people who are bilingual, but rather individuals who have a limited ability to read, write, or understand English well or at all.

The purpose of this plan is to ensure that we provide individuals with LEP meaningful access to our transportation programs and activities.

Language Assistance Measures

The type of language assistance necessary to provide meaningful access will vary depending on the type of communication staff is having with the LEP person (e.g. phone, in person or written communication) and in some circumstances more than one method will work. Regardless of how the language assistance is provided, we recognize the importance of providing such services in a timely manner and in an appropriate place. Failure to do so may effectively delay or deny LEP applicants to our transportation and services. We understand that the extent of our obligation to provide both oral and written translation is dependent on the four-factor analysis. We have chosen to follow the Safe Harbor rule, contained in HUD's final guidance, to assist us in determining when to provide translation of vital documents. The Safe Harbor rule for written translation of vital documents is based on the number and percentages of the market area-eligible population or current beneficiaries and applicants that are LEP. According to the Safe Harbor Rule:

HUD would expect translation of vital documents to be provided when the eligible LEP population in the market area or current beneficiaries exceeds 1,000 persons or if it exceeds 5% of the eligible population or beneficiaries along with more than 50 people. In cases where more than 5% of the eligible population speaks a specific language, but fewer than 50 persons are affected, there should be a translated written notice of the person's right to an oral interpretation.

As such, because our LEP riders who speak Spanish are less than 50 in number and comprise less than 5% of our transportation population, we will not translate vital written documents into Spanish. However if a member of the public requests a document in another language, STAR will translate the document at no cost to the requester. STAR will provide interpreters as needed and/or requested. Documents may include but not be limited to: Eligibility and intake documents, schedules, etc.

HUD's safe harbor rule isn't applicable to oral communication. In other words, we have an obligation to provide oral language assistance regardless of the number or percentage of persons

who comprise a specific language group at a site or in the service area. The degree to which we will provide oral language assistance will depend on the nature and importance of the activity.

Competent Bilingual Staff

STAR makes every effort to hire staff that can communicate with our participants. A significant consideration when hiring staff for a site (managerial as well as maintenance staff) is whether the applicant can competently provide language assistance to LEP residents at the site. A large percentage of our site staff is bilingual and every effort has been made to match their language skills with the needs of LEP participants. Our preference is to meet the needs of our LEP applicants and participants through direct language assistance with our site staff. When this isn't possible we are committed to meeting our LEP applicants and participants needs through other methods.

We understand that it isn't enough for staff to be "bilingual" when communicating with our LEP applicants and participants. Some bilingual persons may be able to effectively communicate in two languages but aren't competent to interpret between English and that language. We also recognize that the skills of interpreting and the skills used for translating aren't the same. A person may be capable of one and not the other. We will make every effort to offer bilingual staff interpreter training and professional development opportunities to ensure that communication is effective and accurate.

Oral Language Services In Addition To Bilingual Staff

STAR's goal is to provide meaningful access to our programs for individuals with limited English proficiency in a timely manner. As stated above, we often use competent bilingual staff to act as interpreters for applicants and tenants.

We do recognize however that under some circumstances it is not appropriate for site staff to serve as interpreters or may not have an interpreter available in house. In these circumstances, interpreter will be hired at agency expense.

Informal Interpreters

Applicants and participants who have limited English proficiency may choose to bring an informal interpreter with them to assist in communication, including but not limited to the LEP client's family members, friends, legal guardians, service representatives or personal advocates. In such instances, site staff must remember the following:

- LEP persons who bring an informal interpreter with them must be reminded that STAR is willing to pay for free language interpretation. If the LEP person prefers the informal interpreter, he/she will be permitted to do so at his/her own expense.
- Informal interpreters may not be appropriate, depending on the circumstances and subject matter. Simply put, not all informal interpreters are competent to provide quality and accurate interpretations. As a result, such language assistance may not result in an LEP person obtaining meaningful access to our housing. If a LEP client wants an informal

interpreter, STAR may choose to also have a formal interpreter to ensure accurate translation of complex, legal material;

- In emergencies that are not reasonably foreseeable STAR may need to temporarily rely on informal interpreters.

Accuracy of Translation

STAR will make every to use competent and accurate translators. We recognize that this is particularly important for documents with legal or other information where accuracy has important consequences. Many of the considerations discussed regarding interpreters apply to translators. As stated earlier, the skill of translating is very different from the skill of interpreting, and competency in one does not mean competency in the other. To the degree possible, we will rely on our site staff to translate our documents, and either have two people work in tandem or have one person translate the document and a second, independent translator, translate it back into English to make sure it's accurate.

Staff Training Regarding LEP Policies and Procedures

All current STAR staff is trained on their obligation to provide meaningful access to information and services for LEP persons. Likewise, training on this topic is part of our company's orientation for new Employees. The training seeks to make all employees aware of the following:

- A) Background of the LEP program;
- B) Our site's obligation to provide meaningful access to individuals with LEP;
- C) LEP policies and procedures; and
- D) Protocol in responding to LEP callers, written communications from LEP persons and in-person contact with LEP persons.

Continuous Oversight of the LAP – Monitoring and Updates

STAR will monitor and update this LAP on an ongoing basis.

- Staff must track the language assistance requested and what was provided - both the type of assistance requested as well as in what language. The purpose of this is to determine both need and how well STAR is satisfying these needs.
- STAR will annually review the demographics of our participants to make sure their language assistance needs are adequately met.
- If new demographic data is released by the federal or state government, STAR will review the data and implement accordingly (i.e., adjust marketing efforts and update this plan).

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