

**Limited English Proficiency
(LEP)****Purpose**

This policy is pursuant to 42 USC Section 2000d, 24 Code of Federal Regulations Section 1.4, HUD Handbook 4350.3 REV-1 Change-2, Executive Order 13166, and HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons FR 2732 (1-22-07) for the provision of meaningful access to programs and activities for Limited English Proficient (LEP) persons. The Final Guidance is voluntary, yet HUD or state/local agencies may bring discrimination claims for LEP persons alleging national origin or ethnicity discrimination.

Policy

- No applicant or resident on the ground of race, color, national origin, or any other federal, state, or local protected classes will be excluded from participation in, or denied the benefits, of housing assistance or be subjected to unlawful discrimination. RCM will provide reasonable and meaningful access to programs and activities for LEP persons at our HUD-assisted apartment communities.
- RCM's Language Assistance Plan (LAP) reasonably addresses and identifies the needs of the LEP persons at our apartment communities.
- RCM uses a third-party language translation service called Language Link, which provides verbal and written translation services for prospects and residents.
- RCM will make reasonable efforts to produce or obtain multiple translations of audiovisual materials it uses, if any, to inform or educate applicants and residents.

Informal Interpreters for Oral Interpretation

- Informal interpreters may include the LEP person's family members, friends, legal guardians, service representatives, or advocates. RCM staff will determine whether it is appropriate to rely on informal interpreters depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially minor children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest, too.
- A LEP person may use an informal interpreter of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by RCM. If possible, RCM should accommodate an LEP person's request to use an informal interpreter in place of a formal interpreter. If a LEP person wants to use their own informal interpreter, RCM reserves the right to also have a formal interpreter present.
- If a LEP person prefers an informal interpreter after RCM has offered free interpreter services, the informal interpreter may interpret. In these cases, the LEP person and interpreter should sign a waiver of free interpreter services.
- RCM strongly discourages the use of minor children as interpreters or translators. If a minor is used, the minor must be of a suitable age and discretion (age 16–17).

Outside Resources – Development of Community Resources, Partnerships, and Other Relationships to Provide LEP Services

- Outside resources may include community volunteers or other residents.
- RCM maintains relationships with cultural and ethnic groups living at the community. To help applicants or residents obtain or keep housing assistance, these organizations may provide qualified interpreters for LEP persons.
- Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.
- RCM will limit the use of other residents to translate written documents because (1) it must assure professional quality control for general forms, and (2) it must maintain confidentiality and privacy especially financial and informational privacy for documents specific to particular applicants or residents containing personal information.

- The apartment community may have outside organizations teach English as a Second Language (ESL) classes on-site. The instructors for these ESL classes may be receptive to providing interpretation or translation services or can provide contacts for others who are interpreters or translators.

Procedure

Translation of Documents

1. Determine if HUD (or other third-party document provider) provides translations of standard housing documents in other languages. If the form or other document is a standard HUD form, use that before seeking the translation of a form or other document for a LEP person. HUD-translated materials include HUD 9886 and HUD 9887, HUD 9887-A and HUD's *Resident Rights & Responsibilities* brochure. HUD-translated documents are available at:
 - a. www.hud.gov (HUD's client information and policy system webpage)
 - b. www.hudclips.org and click on forms. When you find the form, the listing will show any available HUD translations.
 - c. www.hud.gov (HUD's Limited English Proficiency (LEP) webpage)
 - d. See the RCM Legal section of the RCM Policies and Forms team site for its LEP directory. The most frequently requested HUD-translated documents are posted there, too.
 - e. Other third-party website
2. If unable to find a translation on the HUD or other third-party website, contact the Regional Manager or the RCM corporate office to request written document translation from Language Link.

Third-Party Oral Interpretation

1. Contact Language Link to provide translation into the language when necessary to provide meaningful verbal access for LEP persons.
 - a. Refer to the Language Link Point to Your Language Card.
 - b. Language Link only provides direct translation from and to the applicant or resident.

Informal Interpreters for Oral Interpretation

1. The applicant/resident signs an Authorization to Contact/Release found in the Privacy policy.
 - a. This serves as a waiver of confidentiality and right to privacy due to privacy and confidentiality concerns.

Outside Resources

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 - a. This serves as a waiver of confidentiality and right to privacy.

Resources

Related Forms

- Authorization to Contact/Release (Found in OneSite)

Related Attachments

- Language Link Point to Your Language Card
- Language Link Point to Your Language Postcard
- Language Link Telephonic Tips and Advice
- Language Link Quality Assurance Program
- Language Link Telephonic How to Access Services – Automated System - Third Party Calls
- Language Link RCM Site IDs

Related Grace Hill Vision Courses

- Fair Housing and Limited English Proficiency

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Attachments

Point to Your Language Card

Point to Your Language Postcard

Telephonic Tips and Advice

Quality Assurance Program

Telephonic How to Access Services – Automated System - Third Party Calls

RCM Site IDs

How to Access Over the Phone Interpretation Services

Step 1: Call 1-877-963-7466

Step 2: Enter Account Number **28494**, followed by # sign

Step 3: Select whether a 3rd party call is needed

- If a 3rd party call is selected, you will be prompted to enter and confirm the domestic phone number that will be used to reach the 3rd party.

Step 4: Select Language by Entering the Corresponding Number

- If the language you need is not listed in the options, Enter “9” for all other languages
- If you need to speak with a customer service rep. prior to being connected with the interpreter, Enter “9”

Step 5: Enter Site Code

IVR FAQs:

What if I do not know my Account number?

In order to obtain interpretation services, an account number is required. If you do not know your account number please contact your account manager or Language Link’s Client Relations team at 855.579.2704.

What is a third party call?

A third party call is when you need Language Link to call the LEP client and then bridge the call together with you and the interpreter.

I need another language other than the ones listed. How do I get my interpreter on the line?

Press 9 for other languages and let the CSR know which language you require and they will connect you. If the language is unknown, you may reference the “Point to your Language” visual for help with most requested languages or ask a representative for assistance.

What number should I call if my toll-free interpretation line isn’t working?

Language Link understands that some telephone providers do not allow customers to access toll free lines. Because we want to ensure our customers have access to interpretation services, we assign backup local numbers for customers that may fall into this category. If you are unable to access the toll-free interpretation line assigned to your account, you may access interpretation services by dialing the backup number **360-314-0035**. Please note, you may incur long distance charges from your telephone provider when accessing the backup local number.

Please contact our Client Relations Team if you have any further questions:

Email: ClientRelations@Language.Link

Toll Free: 1-855-579-2704

Site ID	Community Name	City	State
1112	51st & King	Chicago	IL
1050	Argonaut/El Tovar Apartments	Denver	CO
1026	Ashtabula Towers	Ashtabula	OH
1079	Autumn Ridge Village	Sterling Heights	MI
1098	Bay Ridge Gardens	Annapolis	MD
1113	Belage Manor	Anaheim	CA
1101	BJ Wright	Chicago	IL
1018	Bowin Place	Detroit	MI
1001	Buckeye Towers	New Boston	OH
1042	Burton Place	Burton	MI
1080	Cambridge Towers	Detroit	MI
1002	Canton Towers	Canton	OH
1070	Casa Panorama	Panorama City	CA
1017	Citizen's Plaza(Nu-Ken Towers)	New Kensington	PA
1015	Connellsville Towers	Connellsville	PA
1076	Coraopolis Towers	Coraopolis	PA
1051	Drehmoor Apartments	Denver	CO
1083	Farmington Place	Farmington	MI
1008	Frenchtown Place	Monroe	MI
1072	Glendora Gardens	Glendora	CA
1024	Golden West Tower Apartments	Torrance	CA
1095	Goodwill Terrace	Astoria	NY
1092	Grace West Manor Apartments	Newark	NJ
1077	Grand Lowry Lofts	Denver	CO
1114	Guild House	Philadelphia	PA
1111	Jackson Park Terrace	Chicago	IL
1020	John Sale Manor	Xenia	OH
1103	Juanita Nolasco Residences	Denver	CO
1106	Kings Villages	Pasadena	CA
1019	Lakeland Place	Waterford	MI
1003	Lima Towers	Lima	OH
1052	Mable H. Kehres Apartments	Monroe	MI
1038	Metro Green Apartments	Stamford	CT
1040	Metro Green Court	Stamford	CT
1039	Metro Green Residences	Stamford	CT
1041	Metro Green Terrace	Stamford	CT
1054	Miramar Towers	Los Angeles	CA
1107	NC Five	Philadelphia	PA
1078	North Port Village	Port Huron	MI
1005	Oceanpointe Towers	Long Branch	NJ
1012	Park Place Towers	Mt. Clemens	MI
1109	Pasatiempo	Fremont	CA
1108	Paseo Verde	Philadelphia	PA

1009	Perrytown Place	Pittsburgh	PA
1105	Piedmont	Alameda	CA
1013	Pine Grove Manor	Muskegon Township	MI
1081	Plymouth Square Village	Detroit	MI
1014	Riverside Towers	Coshocton	OH
1115	Sendero Verde	New York	NY
1100	Shippan Place	Stamford	CT
1088	Shore Hill	Brooklyn	NY
1037	Squire Village	Manchester	CT
1073	The Grove	Ontario	CA
1057	The Springs(La Mesa)	La Mesa	CA
1100	Thessalonica Court	Bronx	NY
1074	Tower 43	Kent	OH
1096	Tower West Apartments	New York	NY
1011	Towne Centre Place	Ypsilanti	MI
1110	Transit Village	Philadelphia	PA
1044	Village Center	Detroit	MI
1084	Village Square Apartments	Williamsville	NY
1085	Ziegler Place	Livonia	MI



QUALITY ASSURANCE PROGRAM



Our 10 step QA process ensures superior quality of our **Over-the-Phone Interpretation** services.

1 ANSWER TIME

Average answer times are constantly monitored. Customers in our Interactive Voice Response (IVR) system are greeted within three seconds, and customers serviced by live operators are greeted in an average of 12 seconds.

2 DATA COLLECTION

Every customer account is configured based on your requirements. Our IVR system and live operators utilize this information to service your call.

3 CALL CENTER CUSTOMER SERVICE

Our calls are consistently monitored by a Customer Service Representative (CSR) to ensure we are providing you with the best possible service.

4 INTERPRETER CONNECT TIME

Our average connect time is 30 seconds. Connect times are monitored in every language and for each account, everyday.

5 INTERPRETER GREETING

Our interpreters will always answer your call with their first name, the language in which they are providing services, and their identification number.

6 INTERPRETER CUSTOMER SERVICE

With your permission, calls are monitored to ensure quality and identify areas for improvement.

7 CODE OF ETHICS FOR INTERPRETERS

We ensure compliance with the Code of Ethics for Interpreters by monitoring the following:

- Verify meaning is being conveyed accurately, without paraphrasing
- Ensure all information is being treated confidentially and relayed faithfully
- Confirm that the interpreter is not acting as an advocate on behalf of the client or otherwise exerting their personal beliefs or feelings

8 CLOSING THE CALL

All interpreters will close the call by thanking both parties, asking if there is any additional need for their services, and then informing the customer that they are disconnecting from the call.

9 CONFLICT RESOLUTION

Should an issue occur during the call, either the interpreter or CSR will report the issue to Language Link management. We view conflict resolution as a training opportunity and a chance to improve our services. You can expect prompt resolution of any issues or concerns that may arise.

10 BILLING AND REPORTING

After your first interpretation call with Language Link, a member of our staff will reach out to you for your feedback, and to be sure you were satisfied with our services. You'll also receive communication from our accounting team after your first invoice is issued, to ensure the billing process is working smoothly.



800.208.2620

701 NE 136th Ave. Suite 200 Vancouver, WA 98684
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Point to your language.
An interpreter will be provided at no cost to you.

Arabic

يرجى الإشارة إلى لغتك.
سيتم إمدادك بمترجم مجاناً.

Japanese

あなたの言語を選択してください、
通訳を無料で提供できます。

Burmese

သင့်ဘာသာစကားကို ညွှန်းပြပါ။ သင်ကုန်ကျခံစရာမလိုဘဲ
စကားပြန်တစ်ဦးကို ပံ့ပိုးထားပါသည်။

Polish

Wskaż swój język.
Zapewnimy ci tłumacza bezpłatnie.

Cantonese

請點擊您所選的語言。
我們會為您提供免費傳譯員服務。

Portuguese

Indique seu idioma.
Você terá direito a um intérprete sem custos.

Farsi

به زبان خود اشاره کنید. یک مترجم شفاهی به
صورت رایگان در اختیارتان قرار خواهد گرفت.

Punjabi

ਆਪਣੀ ਭਾਸ਼ਾ ਦੀ ਚੋਣ ਕਰੋ। ਤੁਹਾਨੂੰ ਦੁਭਾਸ਼ੀਏ ਦੇ ਸੇਵਾ
ਮੁਫਤ ਵਚਿ ਮੁਹੱਈਆ ਕਰਵਾਈ ਜਾਵੇਗੀ।

French

Indiquez votre langue. On
vous soumettra gratuitement un interprète

Russian

Наведите курсор на свой язык.
Переводчик будет предоставлен вам бесплатно.

Haitian Creole

Montre ki lang ou pale.
Y ap ba w yon entèprèt gratis.

Somali

Tilmaan luqaddaada.
Turjubaan ayaa bilaash laguugu siinayaa.

Hindi

अपनी भाषा की ओर संकेत करें।
आपको एक दुभाषयि मुफ्त प्रदान किया जाएगा।

Spanish

Señale su idioma.
Se le proporcionará un intérprete
sin costo para usted.

Hmong

Taw tes rau koj hom lus. Yuav muab ib
tug neeg txhais lus rau koj tsis tau them ngi.

Tagalog

Ituro ang iyong wika. Ilalaan ang
isang interpreter nang wala kang babayaran.

Italian

Indica la tua lingua.
Ti sarà fornito un interprete gratuitamente.

Vietnamese

Hãy trỏ tới ngôn ngữ của bạn.
Bạn sẽ được cung cấp một thông dịch viên
miễn phí.



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We Speak Your Customers Language

Arabic	العربية
Bosnian	Bosanski
Brazilian Portuguese	Português do Brasil
Cambodian	ភាសាខ្មែរ
Cantonese	廣東話
Croatian	Hrvatski
Farsi	فارسی
French	français
German	Deutsch
Haitian Creole	Kreyòl Ayisyen
Hindi	हिन्दी
Hmong	Hmoob
Japanese	日本語
Korean	한국어
Lao	ພາສາລາວ
Mandarin	國語
Punjabi	ਪੰਜਾਬੀ
Romanian	Română
Russian	Русский
Serbian	Srpski
Somali	Soomaali
Spanish	Español
Thai	ภาษาไทย
Tagalog	Tagalog
Vietnamese	Tiếng Việt

DO

Speak in “FIRST PERSON” (e.g.”Do you have a fever” instead of, “Ask her if she has a fever please”) the interpreter is expected to interpret exactly as you state it. Please pause while the interpreter repeats each statement in the respective language.

Explain some things in more detail as terminology, concepts, and cultural expressions may not have an equivalent in the target language and may need to be clarified.

Control the flow of conversation. Treat the appointment as if you were providing direct service to an English speaking client.

Ask the interpreter and the LEP client questions to ensure they understand what you want to communicate.

Follow up by providing Language Link feedback about your interpretation services.

DON'T

Ask the interpreter for his/her opinion about the situation being interpreted.

Have a side conversation with the interpreter or permit one between the client and interpreter.

Discuss anything unrelated to the interpretation assignment.

Find us online: www.language.link



TIPS & ADVICE



YOUR ROLE

WE ACCOMMODATE THREE-WAY INTERPRETATION CALLS. At the beginning of the call tell the call center agent the name and phone number of the third party call to be connected.

IMMEDIATELY INTRODUCE YOURSELF to the limited-English proficient (LEP) client and explain your reason for calling.

ALWAYS SPEAK IN FIRST PERSON. For example, say, “Do you have a fever?” rather than “Ask her if she has a fever please.”

TELEPHONE INTERPRETATION IS CONSECUTIVE INTERPRETATION. After you speak one-two sentences or finish a thought, pause to give the interpreter enough time to interpret each statement in the respective language.

CONTROL THE CONVERSATION. The interpreter is only there to interpret. You are responsible for making sure the LEP client receives the same service as an English-speaking client.

ASK THE INTERPRETER AND THE LEP CLIENT QUESTIONS to ensure they understand what you want to communicate.

BE PREPARED TO EXPLAIN SOME THINGS IN MORE DETAIL FOR THE INTERPRETER. Some terminology and concepts may not have an equivalent in the target language.

AVOID ASKING THE INTERPRETER FOR HIS/HER OPINION about the situation being interpreted.

PROVIDE FEEDBACK ABOUT YOUR INTERPRETATION SERVICES. We want to know about your interpretation experience. To that end, your feedback is critical.

YOUR INTERPRETER'S ROLE

YOUR INTERPRETER SHOULD INTRODUCE THEMSELVES using a first name and ID number. They are not required to provide a last name.

YOUR INTERPRETER WILL PROVIDE A BRIEF INTRODUCTORY on how to utilize their services, to you and your LEP (limited English proficiency) client.

YOUR INTERPRETER SHOULD NOT HAVE A SIDE CONVERSATION with you or the client. He or she must relay everything that is said back to you or to your client. This includes any advice the client may ask of the interpreter.

YOUR INTERPRETER SHOULD NOT DISCUSS ANYTHING UNRELATED to the telephone interpretation assignment.



+1 800.208.2620

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Shore Hill - Language Access Survey

Dear Resident,

Thank you for taking the time to participate in this confidential survey. Your feedback is valuable in helping us ensure that our services meet the language needs of our diverse community. Please take a few minutes to answer the following questions.

Section 1: Demographic Information

1.1. What is your primary language?

- ☐ English
- ☐ Spanish
- ☐ Other (please specify): _____

1.2. How would you rate your proficiency in English?

- ☐ Fluent
- ☐ Moderate
- ☐ Limited
- ☐ No proficiency

Section 2: Language Access Services Awareness

2.1. Are you aware of language assistance services provided by our organization?

- ☐ Yes
- ☐ No

2.2. If yes, which language assistance services have you utilized? (Check all that apply)

- ☐ Translation of written materials
- ☐ Interpretation services (spoken)
- ☐ Other (please specify): _____

Section 3: Satisfaction with Language Access Services

3.1. How satisfied are you with the language assistance services you have received?

- ☐ Very Satisfied
- ☐ Satisfied
- ☐ Neutral
- ☐ Dissatisfied
- ☐ Very Dissatisfied

3.2. If you have used language assistance services, please share any specific feedback or suggestions for improvement.

Section 4: Cultural Competence

4.1. Do you feel that our staff is culturally competent and sensitive to the needs of individuals from diverse linguistic and cultural backgrounds?

- ☐ Yes
- ☐ No
- ☐ Not Sure

4.2. If no or not sure, please provide details or suggestions for improving cultural competence.

Section 5: General Feedback

5.1. Is there anything else you would like to share regarding language access and cultural competence within our organization?

Section 6: Contact Information (Optional)

6.1. If you would like us to follow up with you regarding your feedback, please provide your contact information (email/phone):

Thank you for completing this survey. Your input is crucial in helping us enhance our language access services and better serve our community. If you have any additional comments or concerns, please feel free to contact _____

Shore Hill Management