



HOUSING OPPORTUNITIES COMMISSION OF MONTGOMERY COUNTY LANGUAGE ACCESS PLAN

The purpose of the Language Access Plan (“LAP”) is to create a process by which the Housing Opportunities Commission of Montgomery County (“HOC” or the “Agency”) can consistently provide meaningful access to its programs and opportunities for individuals with Limited English Proficiency (“LEP”). The term “Limited English Proficiency” includes any individual whose primary language is not English and/or is limited in their ability to read, write, speak, or understand English. This includes people with LEP due to a disability. By improving HOC’s communication and understanding of its customers’ needs, HOC staff are better equipped to assist the Agency’s customers quickly and effectively. By enabling customers to better understand HOC’s programs and provided services, participants and applicants alike will enjoy a more comfortable and efficient housing experience.

Furthermore, the LAP described herein is applied by HOC in a consistent and nondiscriminatory manner to guide actions taken by Agency staff regarding the LAP’s implementation. All applicable HOC staff must comply with this Plan.

APPLICABILITY

As per 45 CFR 92.201(b)(2), HOC must create and implement a LAP which applies to all of its customers and prospective applicants. In this way, any individual’s LEP status is prevented from serving as a barrier to their understanding and participating in HOC programming.

LANGUAGE ACCESS PLAN

Meaningful Access: Four Factor Analysis

Meaningful access means language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals. Every five years, HOC will assess and update the following four-part analysis of the LAP.

1. The number or proportion of LEP individuals eligible for HOC housing or likely to be eligible for HOC housing;
2. The frequency of a language used by people in Montgomery County coming into contact with HOC;
3. The function and significance of HOC’s programs, activities, and services to an LEP individual’s life; and/or
4. HOC’s resources and the cost of providing meaningful access.*



Factor One: The number or proportion of LEP individuals eligible for HOC housing or likely to be eligible for HOC housing.

HOC analyzes the language data in its wait list system (the “Housing Path”) to project the languages most likely to be used by incoming HOC participants. This includes only those language preferences for which wait list applicants self-identified as their preference for communication with HOC. HOC also maintains copies of office and event sign-in sheets for reference and analysis regarding language access. Together, these efforts help HOC to prioritize the languages that need the greatest assistance.

Housing Path provides the following primary language preferences of customers currently seeking participation in HOC programming as of November 2018:

#	Language	Active Applicants	Percent
-	Total	29,849	100.00%
1	English	27,861	93.34%
2	Spanish	894	3.00%
3	Chinese (Mandarin and Cantonese)	268	0.90%
4	Korean	215	0.72%
5	French	133	0.45%
6	Russian	115	0.39%
7	Other	106	0.36%
8	Amharic	97	0.32%
9	Vietnamese	61	0.20%
10	Creole	15	0.05%
11	Arabic	15	0.05%
12	Farsi	13	0.04%
13	Tagalog	6	0.02%
14	Pashto	5	0.02%

Per the statistics provided in the table above, HOC’s largest likely population of LEP individuals are Spanish speakers. Accordingly, HOC provides a Spanish translated version of its Housing Path wait list on its website at www.HOCHousingPath.com. The other language groups most likely to request translation services represented by at least 0.50 percent of the total population are Chinese and Korean. Accordingly, HOC works with its partners to provide interpretation services for these language groups as the second order of priority. Recently, HOC added a translated version of its Housing Path wait list on its website for the Chinese, Korean, French, Amharic, and Portuguese languages. The remaining 10 language groups from this table receive the third order of priority for interpretation services.

Factor Two: The frequency of a language used by people in Montgomery County coming into contact with HOC.



HOC analyzes the information in its Yardi database and Housing Path system to project the anticipated number of contact points a customer may have with HOC. This includes in-person and electronic/computer-based interactions. HOC also maintains copies of office and event sign-in sheets for reference and analysis regarding language access. Together, these efforts help HOC to prioritize the languages that need the greatest assistance.

Table B16001 from the U.S. Census Bureau’s 2017 American Community Survey provides the following language statistics for Montgomery County, Maryland. This table indicates the language spoken at home among those languages represented with at least 0.50 percent of the total population. This chart includes only persons aged 5 years and older in Montgomery County. Although this table features only 16 language groups, the full information from the Census Bureau’s 2017 American Community Survey provides information on a total of 43 language groups.

#	Language	Population	Percent
-	Total (5 years and older)	991,928	100.00%
1	Speak only English	579,791	58.45%
2	Spanish	174,103	17.55%
3	Chinese (including Mandarin, Cantonese)	39,938	4.03%
4	French (including Cajun)	24,301	2.45%
5	Amharic, Somali, or other Afro-Asiatic languages	16,796	1.69%
6	Korean	14,583	1.47%
7	Tagalog (including Filipino)	11,649	1.17%
8	Yoruba, Twi, Igbo, or other languages of Western Africa	11,212	1.13%
9	Vietnamese	9,928	1.00%
10	Portuguese	7,345	0.74%
11	Hindi	7,166	0.72%
12	Persian (including Farsi, Dari)	7,160	0.72%
13	Russian	7,007	0.71%
14	Nepali, Marathi, or other Indic languages	6,912	0.70%
15	Arabic	5,788	0.58%
16	Urdu	5,204	0.52%

The U.S. Census Bureau’s 2017 American Community Survey breaks down these statistics further by subdividing each language group into two categories: (a) those who speak English very well, despite speaking a different language at home, and (b) those who do not speak English very well and speak a different language at home. Among the 43 language groups provided by the Census Bureau’s 2017 American Community Survey, the following table provides information on only those who do not speak English very well and speak a different language at home. This table represents the 16 largest population groups as a percentage of those in Montgomery County aged 5 years and older. HOC projects that these are the individuals from whom HOC is most likely to receive requests for translation and interpretation assistance should they apply for HOC programming.



#	Language	Population	Percent
-	Total	991,928	100.00%
1	Speak only English	579,791	58.45%
2	Spanish	70,296	7.09%
3	Chinese (including Mandarin, Cantonese)	17,034	1.72%
4	Korean	7,395	0.75%
5	Amharic, Somali, or other Afro-Asiatic languages	6,196	0.62%
6	Vietnamese	5,231	0.53%
7	French (including Cajun)	4,708	0.47%
8	Other languages of Asia	2,426	0.24%
9	Punjabi	2,088	0.21%
10	Tagalog (including Filipino)	2,050	0.21%
11	Russian	1,900	0.19%
12	Persian (including Farsi, Dari)	1,788	0.18%
13	Nepali, Marathi, or other Indic languages	1,777	0.18%
14	Bengali	1,776	0.18%
15	Arabic	1,762	0.18%
16	Portuguese	1,624	0.16%

Per the 2017 statistics provided in the tables above, HOC's largest likely population of LEP individuals are Spanish speakers. Accordingly, HOC provides translated documents in Spanish for its customers whenever possible. The other language groups most likely to request translation services represented by at least 0.50 percent of the total population are Chinese (including Mandarin and Cantonese), Korean, Amharic, Somali, or other Afro-Asiatic languages, and Vietnamese. Accordingly, HOC works with its partners to provide interpretation services for these languages groups as the second order of priority. The remaining 10 language groups from this table receive the third order of priority for interpretation services.

Factor Three: The function and significance of HOC's programs, activities, and services to an LEP individual's life.

Whenever a staff member engages with a customer involving their housing or other resident services, the staff member must document if failure to provide language assistance resulted in a substantial delay in serving the customer. This information is then reported to HOC's Legislative and Public Affairs Department for statistical purposes. As HOC plans for future service delivery and events, these statistics are consulted to assist with providing language access solutions in advance of a customer identifying their need. These efforts include the provision of sign-language and other disability-related interpretation assistance.

Factor Four: HOC's resources and the cost of providing meaningful access.

HOC uses both third-party vendors and HOC-verified multi-lingual staff members as professional, competent translators and interpreters. HOC procures qualified vendors to provide written translations of vital documents, as well as oral interpretation for languages not spoken by available HOC staff members. The primary vendor which HOC uses for telephone interpreting services is Language Line Solutions ("Language Line") (800-878-8523). HOC uses Language Line on an as-needed basis, in which HOC is charged for their services by the minute. HOC staff members who agree to serve as oral interpreters



receive additional compensation for demonstrating proficiency in multiple languages by participating in interpreter/cultural competency training. Only once their training is completed can HOC staff serve as oral interpreters. HOC's Human Resources ("HR") Department maintains the list of HOC-verified multi-lingual staff and posts it on HOC's internal intranet system for access by any staff for whom language assistance is needed.

As of February 2021, HOC has multi-lingual staff available to assist non-English speaking families with LEP in the following languages:

- Spanish;
- Korean;
- Vietnamese;
- Chinese;
- Amharic;
- Farsi/ Persian; and
- Russian.

Additionally, HOC participates in multiple partnerships with Montgomery County departments, agencies, and community organizations to provide volunteer interpretation services for HOC's customers when professional interpreters are not available. In particular, HOC staff has access to the Montgomery County Language Bank which lists volunteers who identify themselves as competent in translation and interpretation for a specific language or languages.

HOC's primary interpreting service for sign language for people who are deaf, hard of hearing, or have difficulty with speech, is Purple Communications, Inc. ("Purple") (866-669-7707). When services are needed, HOC staff will schedule an appointment at least five days ahead of time and an interpreter will attend the appointment. HOC has a contract with Purple and is charged for these services.

HOC allows its customers to waive their right to HOC's free professional and/or volunteer language services so that they may use family or friends above the age of eighteen as oral interpreters. Please see Appendix A for a copy of this Waiver of Offer for Free Interpretation Services.

Language Assistance

Any individual whose primary language is not English and/or is limited in their ability to read, write, speak, or understand English is eligible for consideration as a LEP individual. This includes people with limited English proficiency due to a disability. Persons who obtain this LEP status are entitled to language assistance with HOC's programs and activities.

HOC staff makes reasonable efforts to provide opportunities of meaningful access to LEP customers. HOC staff offers a list of various languages from which an LEP customer can select their preferred and/or primary language. Please see Appendix B for a copy of this Language Selection List. HOC staff also use the Personal Declaration form at every initial certification, re-certification, and interim certification to update the translation and/or interpretation services needed and/or requested for each household.

HOC assesses customers' need for language assistance based on requests for translation, interpretation, and the customers' literacy skills. Based on this information, HOC is able to distinguish between language



assistance provided in the form of written translations and oral interpretations to appropriately meet the need of the given customer.

Written Translations

HOC weighs the costs and benefits of translating documents for potential LEP groups. Factors taken into consideration when translating documents are barriers to meaningful translations, interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and other relevant factors. HOC begins this evaluation process when an eligible LEP group constitutes a significant proportion of an eligible customer group. The significant proportion threshold is reached when a language group constitutes at least 0.50 percent in Housing Path's statistics for language preferences for which wait list applicants self-identified as their preference for communication with HOC (see Table in Factor 1, above).

Based on the Four-Factor analysis, at this time HOC translates most vital documents into Spanish. Determination of what constitutes a vital document for the purposes of this LAP is at the discretion of HOC's Executive Director.

HOC requires that persons providing written translation of documents certify as to their knowledge of English and commitment to proper translation. HOC also requires the customer for whom the translation is completed to certify that they understand the contents of any translated documents, which they receive from HOC by signing a Written Translation Certification Form. Please see **Appendix C** for a copy of this Written Translation Certification Form.

HOC staff will explain to its customers that any written translations of HOC or HUD forms are not the official/legal version of the form. Vital document translations are used for the sole purpose of helping LEP customers to understand the contents of the document. They are a convenience to assist the customer in understanding their rights and obligations. When a staff member uses a vital document translation to help a customer understand a document, the client is instructed only to sign the English version of the documents and forms, since the English version represents the official/ legal version of the given document or form. Accordingly, each translated document must include the following statement:

"This document is a translation of a HOC-issued legal document. HOC provides this translation to you merely as a convenience to assist in you understanding 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."

Oral Interpretations

HOC agrees to provide interpreters, including multi-lingual staff and procured vendors, in accordance with this LAP. Written translation and oral interpretation services are provided consistent with the four-factor analysis detailed above.

A customer may request oral interpretations of any vital document into their preferred language. A customer may also request oral interpretations of any documents not otherwise translated. HOC makes every effort to provide this assistance, but asks for the customer's patience for languages which are less common.



In cases of formal or informal hearings during which an HOC staff serves as an interpreter for a customer, the interpreter may not be a subordinate to the HOC staff member involved in the decision on the customer's hearing.

If an LEP customer prefers to use an informal interpreter, such as a friend or family member, instead of an interpreter provided by HOC, staff must confirm that the interpreter is over the age of eighteen. In such situations, the customer and interpreter of choice must also sign a waiver of HOC's free interpreter services and the assumption of liability from the interpreter they provided. Please see **Appendix A** for a copy of this Waiver of Offer for Free Interpretation Services.

HOC requires that persons providing oral interpretation of documents certify as to their knowledge of English and commitment to proper interpretation. HOC also requires the customer for whom the interpretation is completed to certify that they understood the oral interpretation, which they received from HOC and its agent by signing an Oral Interpretation Certification Form. Please see **Appendix D** for a copy of this Oral Interpretation Certification Form.

Applicability

This LAP applies to all merit system employees and Executive Staff members, including management and non-supervisory staff. All covered HOC employees must receive training on this LAP within one year of beginning their employment and at least once every five years thereafter. Training is coordinated by HOC's Compliance Department and is advertised to staff for participation.

APPENDICES

- **Appendix A:** *Waiver of Offer for Free Interpretation Services*
(Intranet/Divisions/Compliance/Compliance Policies and Forms)
- **Appendix B:** *Language Selection List*
(Intranet/Divisions/Compliance/Compliance Policies and Forms)
- **Appendix C:** *Written Translation Certification Document*
(Intranet/Divisions/Compliance/Compliance Policies and Forms)
- **Appendix D:** *Oral Interpretation Certification Form*
(Intranet/Divisions/Compliance/Compliance Policies and Forms)

COMPLIANCE OVERSIGHT

HOC's Executive Director is responsible for enforcing this LAP. At the direction of the Executive Director, the Compliance Department reviews HOC's LAP annually to confirm that all procedures remain in compliance with federal, State, and local fair housing and disability regulations. Please direct any questions regarding the LAP review process to the Compliance Oversight Manager.

Upon request, copies of this document are available in an accessible format to persons with disabilities.



HOUSING OPPORTUNITIES COMMISSION OF MONTGOMERY COUNTY Waiver of Offer for Free Interpretation Services

NAME OF LIMITED ENGLISH PROFICIENT CUSTOMER/RECIPIENT/REPRESENTATIVE

- HOC informed me of my right to free interpretation services from HOC.
- I understand that HOC is offering me interpreter services at no cost to me or my family members.
- I understand that I am allowed to change my mind at any time and accept HOC's free interpretation services.
- I choose **NOT** to use a free interpreter, provided by HOC, at this time. Instead, I will use my own interpreter, who is at least 18 years of age.

BRIEF DESCRIPTION OF THE PURPOSE OF THE INTERPRETATION SERVICES:

SIGNATURE*

DATE

Please select one of the following, which best describes you:

- LEP CUSTOMER / RECIPIENT / REPRESENTATIVE

***A signature is only needed if the contact with the Limited English Proficiency individual, or representative, is in-person. However, the date is always required.**



NAME OF EMPLOYEE (PLEASE PRINT)

DATE

EMPLOYEE SIGNATURE

DIVISION/DEPARTMENT

E-MAIL ADDRESS

PHONE NUMBER

Whenever applicable: The interpreter named below acknowledges that they read this form to the Limited English Proficiency individual(s) in his or her primary language.

NAME OF THE INTERPRETER

DATE

RELATIONSHIP TO CUSTOMER

SIGNATURE OF INTERPRETER

DATE

Note: Limited English Proficiency (LEP) individuals are people who do not speak English as their primary language and have a limited ability to read, write, or understand English.

Upon request, copies of this document are available in an accessible format to persons with disabilities.



Language Selection List		
Housing Opportunities Commission of Montgomery County, Maryland		
HOC staff makes reasonable efforts to provide opportunities of meaningful access to persons of Limited English Proficiency (LEP). From the list below, please select the language(s), which you prefer for your communication with		
#	Language	Selection
1	English	
2	Spanish	
3	Chinese (incl. Mandarin, Cantonese)	
4	French (incl. Cajun)	
5	Amharic, Somali, or other Afro-Asiatic languages	
6	Korean	
7	Tagalog (incl. Filipino)	
8	Yoruba, Twi, Igbo, or other languages of Western Africa	
9	Vietnamese	
10	Portuguese	
11	Hindi	
12	Persian (incl. Farsi, Dari)	
13	Russian	
14	Nepali, Marathi, or other Indic languages	
15	Arabic	
16	Urdu	
17	Other languages of Asia	
18	Greek	
19	Other and unspecified languages	
20	Punjabi	
21	Bengali	
22	Tamil	
23	German	
24	Other Indo-European languages	
25	Gujarati	
26	Telugu	
27	Hebrew	
28	Swahili or other languages of Central, Eastern, and Southern Africa	
29	Japanese	
30	Italian	
31	Thai, Lao, or other Tai-Kadai languages	
32	Haitian	
33	Khmer	
34	Ilocano, Samoan, Hawaiian, or other Austronesian languages	
35	Malayalam, Kannada, or other Dravidian languages	
36	Serbo-Croatian	
37	Armenian	
38	Polish	
39	Ukrainian or other Slavic languages	
40	Yiddish, Pennsylvania Dutch or other West Germanic languages	
41	Hmong	
42	Navajo	
43	Other Native languages of North America	

