



LIMITED ENGLISH PROFICIENCY LANGUAGE ACCESS PLAN

HOUSING SECTION
CITY OF FLAGSTAFF



Updated September 2023

Purpose

The City of Flagstaff Housing Section (CFHS) is a recipient of federal funds, and therefore required to comply with Executive Order 13166. On August 11, 2000, [Executive Order 13166](#) was implemented to clarify existing Title VI responsibilities for entities that receive federal funds. The goal of the order is to improve access to federal programs and activities for persons who have Limited English Proficiency (LEP) due to their national origin and may be limited in their ability to speak, read, write, or understand the English language.

CFHS is committed to reducing barriers and ensuring equal opportunity for all persons who apply for any program or activity administered by the section. [Title VI, 42 U.S.C. § 2000d, of the 1964 Civil Rights Act](#) specifies that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

As an entitlement community receiving an annual allocation of Community Development Block Grant (CDBG) funds from the Department of Housing and Urban Development (HUD), Executive Order 13166 applies to all CFHS programs and activities. This Language Access Plan (LAP) outlines the reasonable steps the CFHS will take to provide meaningful access to all programs and activities for LEP persons, in accordance with Executive Order 13166.

Four-Factor Analysis

To identify the extent and adequacy of assistance a LEP person will receive, the following four-factor analysis was conducted:

Factor 1: Number of LEP Persons Likely to be Served by the Program

While CFHS programs and activities only serve a portion of the Flagstaff population, they impact the whole community. The United States Census Bureau indicates 4.0% of Flagstaff residents speak English less than “very well,” with the largest single incidence being 2.2% (1,534 persons) among those who speak Spanish (2020 Selected Social Characteristics, American Community Survey).

Factor 2: Frequency of Contact with the Program

The CFHS administers a variety of programs. Examples of these programs are a down payment assistance program, an Owner-Occupied Housing Rehabilitation Program, and a Community Land Trust/Deed Restricted homeownership program. Clients initially interact with a non-profit community partner, contracted by the CFHS, to determine eligibility. As the community partner receives federal grant funds through the CFHS, it is also obligated to comply with Executive Order 13166. Following eligibility determination and the close of escrow of affordable homes, the CFHS works, as necessary, with clients directly to manage loans and assist in complying with the requirements of the deed and promissory note. The frequency of contact for these programs is every 18-24 months on average.

Through the administration of the CDBG program, CFHS staff work directly with subrecipients, who are also responsible for complying with Executive Order 13166.

Factor 3: Importance of the Program

The Flagstaff City Council declared a Housing Emergency for the City of Flagstaff on December 1, 2020, recognizing the need to make housing a priority for the organization. [Resolution No. 2020-66](#) indicates

there has been a documented need for affordable housing in Flagstaff for over 50 years, but the need has reached crisis levels recently due to overwhelmingly high housing costs resulting from limited supply and Area Median Income (AMI) limits not keeping up with housing affordability and rent increases. As the resolution points out, "research shows that households with safe, decent, and affordable homes are better able to find employment, perform better in school and maintain improved health." CFHS programs and activities are committed to providing safe, decent, and affordable housing for all Flagstaff residents.

Factor 4: Resources and Cost

Interpretation and translation services are available at a minimal cost to the CFHS. Spanish is the predominant language spoken by those who state that they speak English less than "very well." The CFHS currently has employees that are bilingual in English/Spanish and in English/Polish. As requested by a LEP person, and if approved by CFHS, friends and/or family members of LEP persons are used to provide interpretation and translation, as this method is cost-effective, allows for accurate translation into the language spoken by the LEP person, and often leaves the LEP person most at ease. In the event interpretation is needed and no staff member, friend, or family member is available, the CFHS will utilize an on-demand telephonic and/or by-appointment video interpretation service provided by CyraCom International through a contract with the City of Flagstaff Housing Authority (CFHA).

Procedures

Identifying LEP Persons

The following measures will be utilized to identify LEP persons:

- For telephone contact with LEP persons needing assistance, CFHS personnel will identify the language or contact the on-call interpretation service to identify the language.
- All applications for CFHS programs and activities include a question to determine if the client is LEP and needs additional interpretive services.
- Prior to any CFHS-sponsored public meetings, workshops, or conferences, staff will advertise that LEP accommodations are available given reasonable notice.
- Advertisements, fliers, notices, and announcements will contain the following notice: "Persons requiring language, hearing, visual, mobility, or other accommodations may contact the City of Flagstaff Housing Section at (928)213-2750 or TDD 711 to make special arrangements for services."
- **Language Identification and I Speak Cards** will be utilized as necessary to identify an LEP person's primary language.

Language Access Measures

CFHS is committed to providing reasonable interpretation and translation services at no cost to LEP persons.

CDBG staff will ensure that all subrecipients comply with Executive Order 13166. Specifically, subrecipients must have an LEP language access plan to provide meaningful access to services.

As the CFHS office is closed to the public, individuals seeking in-person communication are encouraged to visit the CFHA office located at 3841 N. Fanning Drive, Flagstaff AZ 86004. The CFHA has an LEP LAP plan to assist such persons.

The following services are available to LEP persons through the CFHS:

- Bilingual staff
 - The City of Flagstaff has multiple employees who are bilingual in English/Spanish, and one within the CFHS who is bilingual in Polish, who can be utilized based on availability.
- Telephone interpreter lines
 - The CFHA is contracted with a service that provides on-demand telephonic and by-appointment video interpretation. The CFHS will contact this service as necessary.
- Written language services
 - The City of Flagstaff website, which provides information about the CFHS programs, is compatible with a universal translator.
 - Notices, flyers, and other outreach documents will be posted in English and Spanish.
 - Vital documents will be translated to Spanish by request via CFHA's contracted service, which provides certified translations. All documents will contain the wording, "This translation is provided as a service required under Executive Order 13166. The English version is the official, legal-binding document. This translated document is not an official document."
 - Documents required by LEP persons speaking a language other than Spanish will be translated using the Microsoft Word translator.
 - HUD translated documents will be provided as needed to all language groups where such documents exist.
- Community volunteers
 - To the extent possible, with consent from the LEP person and as agreed by the CFHS, friends and family of the LEP person may be utilized to provide interpretation and translation.

Staff Training

All CFHS staff will be trained on Executive Order 13166 and this LAP. The training will consist of:

- An overview of Title VI of the 1964 Civil Rights Act;
- The CFHS's responsibility under Executive Order 13166;
- Accessing and utilizing **language identification and I Speak cards**;
- Language measures provided by the CFHS;
- How to access a staff interpreter;
- How to access the on-call interpreter service;
- Documentation of language assistance requests; and
- How to handle a complaint.

Staff training on the LAP will be provided by the Language Access Plan Coordinator upon update of the LAP or upon hiring new staff.

Providing Notice to LEP Persons

The following measures will be taken to provide notice to LEP persons of the language services available to them:

- This LAP will be posted on the City of Flagstaff Housing Section **webpage** and shall be made available by request to any entity or individual.
- Correspondence, advertisements, fliers, and announcements for any CFHS-sponsored activity will contain the following notice: "Persons requiring language, hearing, visual, mobility, or other accommodations may contact the City of Flagstaff Housing Section at (928)213-2750 or TDD 711 to make special arrangements for services."

- CFHS will ensure community partners who perform contracted services in the Flagstaff community comply with Executive Order 13166.

Monitoring and Updating LEP Policy

While the CFHS utilized the US Census Bureau data in the four-factor analysis conducted for this LAP, to increase the quality of services provided by CFHS, it is important to better track the LEP persons served by the CFHS programs and activities. Effective September 2023, CFHS staff will begin tracking LEP persons served.

Effective September 2023, Adriana Fisher, Housing Program Manager, will serve as the Language Access Plan Coordinator for CFHS and will be responsible for regularly tracking, monitoring, and updating the LAP to reflect new or changing information and to ensure compliance with Executive Order 13166, at least every five years. The duties of the Language Access Plan Coordinator are to ensure that LEP clients are appropriately represented in all programs and activities. If a new Language Access Plan Coordinator is assigned, this document will be updated to reflect the change.

Complaint Procedure

Complaints, suggestions, or comments regarding this LAP should be submitted in writing to the Language Access Plan Coordinator. A written response will be returned within 15 business days.

<u>By Email:</u>	or	<u>By Mail:</u>
AFisher@FlagstaffAZ.gov		City of Flagstaff Housing Section Attn: Adriana Fisher 211 W Aspen Ave Flagstaff, AZ 86001

If dissatisfied with the Language Access Plan Coordinator's response, please submit complaints, suggestions, or comments in writing, along with the initial response received, to the CFHS Assistant Housing Director, Justyna Costa. A written response will be received within 15 business days.

<u>By Email:</u>	or	<u>By Mail:</u>
JCosta@FlagstaffAZ.gov		City of Flagstaff Housing Section Attn: Justyna Costa 211 W Aspen Ave Flagstaff, AZ 86001