

Approved 9/27/24

PRESBYTERIAN VILLAGES OF MICHIGAN

LANGUAGE ASSISTANCE PLAN FOR ADDRESSING LIMITED ENGLISH PROFICIENCY

A. POLICY STATEMENT

It is the policy of Presbyterian Villages of Michigan (PVM) to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). The policy is to ensure that staff will communicate effectively with LEP individuals, and that LEP individuals will have access to important programs and information. PVM is committed to complying with federal requirements in providing free meaningful access to its programs and activities for its LEP clients.

B. WHO IS LIMITED ENGLISH PROFICIENT (LEP)?

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English.

- Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently.
- LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address, etc.) but may not have sufficient skills to communicate detailed information (e.g., program requirements, policies and procedures) in English.

C. DEFINITIONS

- Primary Language – The language in which an individual is most effectively able to communicate.
- Interpretation – The act of listening to a communication in one language and orally converting it into another language, while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training, and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.
- Translation – The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.
- Bilingual – The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.

- Direct Communication – Monolingual communication in a language other than English between a qualified bilingual employee or other bilingual person and an LEP individual (e.g., Spanish to Spanish).

D. BACKGROUND

- Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person’s inability to speak, read, write or understand English. Recipients of federal funds must provide meaningful access to LEP persons in federal and federally assisted programs and activities.
- On August 11, 2000, Executive Order 13166, titled, “**Improving Access to Services by Persons with Limited English Proficiency**,” was issued. Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to...federally conducted programs and activities by eligible LEP persons...."

E. FRAMEWORK FOR DECIDING WHEN LANGUAGE SERVICES ARE NEEDED

PVM uses the federally recommended individualized four-factor analysis to ensure meaningful access to its programs, services and activities for LEP individuals. Each of the factors are periodically assessed to determine the level and extent of language assistance measures that may be required.

Four-Factor Analysis

1. Proportion and Distribution of LEP persons eligible for service

The American Community Survey provides data estimates for “limited English speaking households,” which they define as a household in which all members 14 years old and over have at least some difficulty with English. The most recent data were collected in 2022 and are summarized here for the Census-defined metro areas PVM serves:

Geography	% households “limited English speaking”
Michigan (statewide)	1.7%
Battle Creek Metro Area	1.1%
Bay City Metro Area	0.3%
Detroit-Warren-Dearborn Metro Area	2.5%
Flint Metro Area	0.6%
Jackson Metro Area	0.5%

Kalamazoo-Portage Metro Area	1.0%
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The federal “safe harbor” situation allows for a recipient to be considered in strong compliance with written-translation obligations if documents are translated for LEP populations over 5% of the eligible population, or 1,000 persons, whichever is less. It is important to be aware of the primary languages spoken in Michigan (English, Arabic, German, Spanish, Mandarin/Cantonese), but in PVM’s case, it is difficult to determine what portion of the percentages listed in the table above are considered “eligible,” because services are age-restricted.

2. Frequency of contact with LEP persons

The demographics above do not imply a high likelihood of PVM staff interacting with LEP clients, although the overall possibility is never ruled out. PVM waiting lists are open to the eligible public, and the organization has documented interactions with LEP applicants and tenants, particularly in southeast Michigan. LEP persons may interact with PVM in-person at any of our Village offices, through mail and e-mail communication, or over the phone.

3. Nature and importance of PVM provisions and services

PVM offers housing, which is a basic human need. There is a limited supply of affordable housing in Michigan, and PVM sees a high number of applicants due to its statewide distribution and reputation for excellence. If an eligible person were to be denied access to an affordable housing opportunity, either because they could not identify the opportunity or could not communicate with the provider, this could be detrimental to their overall quality of life.

4. Resources available to PVM and associated costs

The majority of applicants and residents PVM serves have family or friend contacts who are regularly available to assist them. PVM houses almost exclusively senior citizens, so there is a high probability an LEP household would receive support from a separate household (ie: child, grandchild, niece or nephew) that speaks English well. It would be cost-prohibitive to translate all PVM documents into other languages, given the broad diversity of languages spoken in Michigan, but there are several free or cost-effective resources at PVM’s disposal including vital documents already translated by HUD, local interpretive services, and a forthcoming AI based translation feature in PVM’s housing software.

F. LANGUAGE ASSISTANCE OPTIONS

PVM will offer the opportunity for meaningful access to LEP clients. If a client asks for language assistance, or if staff identifies a client who needs assistance, PVM will make reasonable efforts to provide free language assistance.

The following options are used for providing language services:

I. Oral Interpretation Services

Staff/In-House Services

Quality oral interpretation services will be provided to all LEP persons in some form. Depending on the circumstances, reasonable oral interpretation assistance might be offered through a bilingual employee or family member or through a telephone or internet-based service. It is the LEP person's decision whether to use family members or friends as interpreters, except for the interview/orientation during the application process or rejected application appeal hearing. Extra caution will be exercised when the LEP person chooses to use a minor. PVM will ensure that the LEP person's choice is voluntary, that the LEP person is aware of the possible problems if the preferred interpreter is a minor child, and that the LEP person knows that PVM will provide a competent interpreter at no cost to the LEP person. No adverse action would be taken using a child (anyone under the age of 18) as an interpreter.

Outside Services

When interpretation services are needed, PVM will first attempt to provide services using qualified bilingual employees or a telephone service line as noted above. When qualified bilingual employees are unavailable, or when qualified bilingual employees lack the skills to provide reasonable and timely oral interpretation assistance, PVM will provide services using qualified interpreters.

II. Deciding Which Language Assistance Option to Use

The types of language assistance resources PVM decides to use will depend on the four-factor analysis and may be different in different types of activities.

H. PERSONNEL/HUMAN RESOURCE PLANNING

The Language Assistance Plan for management includes planning on personnel and human resource matters, such as:

- Consideration of language needs and inclusion of second language skills in recruitment, hiring, and promotion plans and criteria.
- Providing training opportunities to improve existing language skills for staff.

- Informing new employees of PVM's duty to offer free language assistance in compliance with Federal requirements.

I. TRAINING

Training is critical so that staff understands how to access language services, and so that those staff involved in actually providing the language services are competent to do so. Initial and periodic training will be conducted for staff coming into contact with LEP persons. Training will include:

- An in-depth discussion of the plan
- How to respond to LEP callers
- How to use the "I Speak" cards
- Which staff and outside vendors are available for interpretation at appointments

Bilingual staff will receive additional training that will address:

- How to adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles.
- How to be competent and knowledgeable in providing interpretation that preserves confidentiality.

J. LANGUAGE ASSISTANCE MEASURES AND INTERNAL CONTROLS

The following procedures will be used to provide language assistance:

Telephone communication:

Callers who are limited English proficient often have an English-speaking person present when they call.

- Ask that English speaking person to identify the language need of the caller.
- Contact a staff member who will arrange for translation services at an agreeable time for all parties.

Written communication:

Contact a staff member who will arrange for translation of the document.

Walk-ins and individuals at the front desk that need translation services:

Identify the language service required using the “I Speak” cards. Contact a staff member who will arrange for translation services at an agreeable time for all parties. A notice to advise LEP clients of their right to an interpreter free of charge will be posted at the front desk.

PVM will:

- Contact a translator from the approved list.
- Negotiate an hourly rate for services required.
- Arrange a date and time for the translation to take place.
- Arrange for payment of services rendered.

Use the language line services as needed

F. LEP MONITORING AND UPDATING THE LAP

Monitoring and implementation of LAP (the Plan) will be conducted by the managers in each service area. The LAP will be reviewed annually by the service area manager.

- Coordinate identification of language service needs and strategies so that staff will have access to appropriate language services in their interactions with clients.
- Identify training needs for staff on implementation of LEP plan and the use of language service providers.
- Establish and maintain the agency’s language assistance resource list.
- Maintain data on selected interactions with LEP persons and provide reports to management, as appropriate. A language log will be maintained by each department representative, including the front desk.