

LEP: Title VI Compliance

1. Review Federal Register Guidance on LEP
2. Recipients of federal funding must comply with Title VI to prevent discrimination based on race, color, or national origin by providing meaningful access to LEP persons (translation or interpretive services) so as not to limit effective participation in its program.
3. For housing providers and related entities follow HUD guidance.
4. HUD Guidance provides framework for providers to give meaningful access to their services.
5. To comply with Title VI, federally funded agencies must take three (3) steps: (1) Conduct a four factor analysis, (2) Create an Language Access Plan (LAP), and (3) Implement and Monitor the LAP.
6. Four Factor Analysis: Conduct Four Factor Analysis to assess the Language Need in your area for the service you provide:
 - a. Number or proportion of LEP persons served or encountered in the eligible service area
 - b. Frequency of contact
 - c. Importance of service, information, program, or activity;
 - d. Cost v. resources and benefits. Small agency v. big. Poor agency v. rich. (Oral interpretation must be available in some form).
6. Safe Harbor of presumptive HUD compliance if written docs translated based on # or % of market area-eligible population or current beneficiaries and applicants that speak a specific language. Vital docs should be undertaken.
7. Keep record of you analysis. **Document!!!**
8. Design a Language Access Plan based on 5 points:
 - a. Identify LEP individuals who need language assistance,
 - b. Measures by which a recipient's staff will provide language services,
 - c. How will a recipient will train its staff to implement LAP,
 - d. Provide public notice of the language services recipient provides, and
 - e. Self-assessment and monitoring by recipient of its LAP.
9. Implement and Monitor the LAP. Select an LEP coordinator.
10. Have an "I speak" card at the front desk or point of entry for LEP clients to communicate to you the language they speak.
11. Housing providers and housing-related agencies, businesses, etc. must also comply with the

Fair Housing Act.

12. Resources for LEP questions: HUD, www.hud.gov, www.lep.gov, ILAS, www.idaholegalaid.org, IFHC

13. Interpretation/translation: Mountain States, BSU, Agency for New Americans, Court Cert transl, ATT Language Line, Certified Language Line, World Relief, IRC.

14. For more information about LEP call: Idaho Legal Aid Services for the Fair Housing Legal Advice Line Monday through Friday between 9:00 a.m. to 12:00 p.m.MST at 1-866-345-0106 outside the Boise calling area, 345-0106 in Boise, TTY 1-800-245-7573; en español llamada gratis estatal, 1-866-954-2591 o 454-2591 en la área local de llamadas en Caldwell.

