

CAMBRIDGE

real estate services

**LIMITED ENGLISH
PROFICIENCY PLAN**

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

1. PLAN STATEMENT

Cambridge Real Estate Services has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines, Cambridge Real Estate Services will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including but not limited to; applicants, recipients and/or persons eligible for housing programs.

2. MEANINGFUL ACCESS; FOUR-FACTOR ANALYSIS

Meaningful access is free language assistance in accordance with federal guidelines. Cambridge Real Estate Services will periodically assess and update the following four-factor analysis, including but not limited to:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Cambridge Real Estate Services.
2. The frequency with which LEP persons using a particular language come into contact with Cambridge Real Estate Services properties.
3. The nature and importance of the program, activity or service to the person's life.
4. Cambridge Real Estate Services resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

3. LANGUAGE ASSISTANCE

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient (LEP) person and may be entitled to language assistance with respect to Cambridge Real Estate Services programs and activities.
2. Language assistance includes interpretation which means oral or spoken transfer of a message from one language into another language; and/or translation, which means the written transfer of a message from one language into another language. Cambridge Real Estate Services will determine when interpretation and/or translation are needed and are reasonable.

3. Cambridge Real Estate Services staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and Cambridge Real Estate Services determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, Cambridge Real Estate Services will make reasonable efforts to provide free language assistance. If reasonably possible, Cambridge Real Estate Services will provide the language assistance in the LEP client's preferred language.

Cambridge Real Estate Services has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

Cambridge Real Estate Services will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients.

4. Translation of Documents
 - a. Cambridge Real Estate Services will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in an LEP group and other relevant factors. Cambridge Real Estate Services will undertake this examination when an eligible LEP group constitutes 5 percent of an eligible client group or 1,000 persons, whichever is less.
 - b. If Cambridge Real Estate Services determines that translation is necessary and appropriate; Cambridge Real Estate Services will translate the lease, selecting mailing and documents of vital importance into that language.
 - c. As opportunities arise, Cambridge Real Estate Services may work with other housing providers to share the costs of translating common documents, which may include language groups which do not (yet) reach the threshold level in Cambridge Real Estate Services client population.
 - d. HUD should provide prototype translations of standard housing documents in multiple languages in a timely fashion. HUD should provide this service to non-profit housing providers and the hundreds or thousands of other non-profit housing providers whose limited resources hinder their LEP efforts.

- e. Cambridge Real Estate Services will consider technological aids such as Internet-based translation services which may provide helpful, although perhaps not authoritative, translations of written materials.

5. Formal Interpreters

- a. When necessary to provide meaningful access for LEP clients Cambridge Real Estate Services will provide qualified interpreters, including Cambridge Real Estate Services bilingual staff and contract vendors. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- b. Cambridge Real Estate Services may require a formal interpreter to certify to the following:
 - i. The interpreter understood the matter communicated and rendered a competent interpretation.
 - ii. The interpreter is covered by state law and will not disclose non-public data without written authorization from the client.
- c. Formal interpreters shall be used at the following:
 - i. Formal hearing for denial of admission to Cambridge Real Estate Services properties;
 - ii. Informal settlement conferences and formal hearing for termination of tenancy;
- d. Any Cambridge Real Estate Services staff interpreter may not be a subordinate to the person making the decision.

6. Informal Interpreters

- a. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Cambridge Real Estate Services 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 children, are not competent to provide confidentiality, competency or conflict of interest.
- b. An 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 Cambridge Real Estate Services. If possible, Cambridge Real Estate Services should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.

- c. If an LEP client prefers an informal interpreter, after Cambridge Real Estate Services has offered free interpreter services, the informal interpreter may interpret. In these cases the client and interpreter should sign a waiver of free interpreter services.
 - d. If an LEP client wants to use their own informal interpreter, Cambridge Real Estate Services reserves the right to also have a formal interpreter present.
7. Outside Resources
- a. Outside resources may include community volunteers, Cambridge Real Estate Services staff or property residents.
 - b. Outside resources may be used for interpreting services at public or informal meetings or events if timely request has been made.
 - c. Cambridge Real Estate Services maintains relations with mutual assistance associations and other organizations that assist specific cultural and ethnic groups living in affordable housing. To help their clients obtain or keep housing assistance through Cambridge Real Estate Services, these organizations may provide qualified interpreters for LEP persons.

4. MONITORING

- A. Cambridge Real Estate Services will review and revise this LEP Plan from time to time. The review will include:
- i. Reports from staff on the number of Cambridge Real Estate Services clients who are LEP.
 - ii. A determination as to whether 5 percent or 1,000 persons from a Cambridge Real Estate Services client group speak a specific language, which triggers consideration of document translation needs as described above.
 - iii. Analysis of staff requests for contract interpreters: number of requests, languages requested costs, etc.
 - iv. Cambridge Real Estate Services will be asked to review the LEP Plan annually.

5. LEP PLAN DISTRIBUTION AND TRAINING

The LEP Plan will be:

- 1. Distributed to all Cambridge Real Estate Services supervisors.
- 2. Available in Cambridge Real Estate Services Site Offices and the Corporate Office.
- 3. Explained in orientation and training sessions for Cambridge Real Estate Services supervisors and other staff who need to communicate with LEP clients.

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TRANSLATION/INTERPRETER SERVICES

CALIFORNIA

Language World Services, Inc.

(916) 333-5247

Fair Oaks Blvd.

Carmichael, CA 95608

Excel Interpreting LLC

(800) 915-0638

1804 Tribute Rd., #207

Sacramento, CA 95815

IDAHO

BTB Language Solutions, Inc.

100 W Overland Rd., Ste. 204

Meridian, ID 83642

Berlitz Language Center

(208) 333-7742

3350 Americana Ter

Boise, ID 83706-2521

OREGON

International Language Bank

(503) 234-0068

<http://www.irco.org/>

10301 NE Glisan St.

Portland, OR 97220-4013

Translations.com

(541) 766-1111

230 SW 3rd St.

Corvallis, OR 97333-4692

<http://www.translations.com/>

Court Interpreter Services

(503) 986-7004

(503) 986-5866 *fax*

http://oid.state.or.us/osca/cpsd/interpreter_services/index.htm

1163 State Street

Salem, OR 97301-2563

WASHINGTON

Columbia Language Services

(360) 896-3881

11818 SE Mill Plain Blvd

Vancouver, WA 98684-7017

The Northwest Translators & Interpreters Society

(206) 701-9183

www.notisnet.org

Seattle, WA 98115

ONLINE SERVICES

<http://www.freetranslation.com/>

<http://translation2.paralink.com/>

<http://babelfish.altavista.com/>

<http://wordreference.com/>

http://www.worldlingo.com/en/products_services/worldlingo_translator.html