

LAKELAND HOUSING AUTHORITY**LIMITED ENGLISH PROFICIENCY
AND LANGUAGE ACCESS POLICY****Fiscal Year 2027***Title VI • Meaningful Access • Four-Factor Analysis • Vital Documents • Quality Controls*

Policy Item	Information
Agency	Housing Authority of the City of Lakeland, Florida
PHA Code	FL011
Address	430 Hartsell Avenue, Lakeland, Florida 33815
Board Resolution	Resolution No. 26-1575
Board Meeting / Effective Date	09/21/2026
Board Chairman	David Samples
Executive Director	Benjamin Stevenson
Policy Coordinator	Senior Vice President or Executive Director designee
Supersedes	LHA LEP Plan 2025 and prior LEP plans

CURRENT FEDERAL POSTURE

This policy recognizes that Executive Order 14224, issued March 1, 2025, designated English as the official language of the United States and revoked Executive Order 13166. HUD Notice PIH 2026-06 rescinded Notice PIH 2024-04, while stating that the withdrawal did not alter PHA responsibility to comply with federal laws applicable to language access, including Title VI. LHA therefore maintains a risk-based language-access program grounded in Title VI, 24 CFR Part 1, the Fair Housing Act, program requirements, participant due process, and documented operational need.

Approval	Signature / Date
Board Chairman	David Samples Signature:  Date: 09/21/2026
Executive Director	Benjamin Stevenson Signature:  Date: 09/21/2026

Executive Transmittal and Board Action

To	Board of Commissioners
From	Benjamin Stevenson, Executive Director
Subject	FY 2027 Limited English Proficiency and Language Access Policy
Resolution	26-1575
Board Meeting Date	09/21/2026
Requested Action	Approve the comprehensive policy and authorize implementation, training, periodic assessment, and non-substantive updates needed to maintain legal and operational accuracy.

BOARD ACTION

Approve the FY 2027 Limited English Proficiency and Language Access Policy under Resolution 26-1575 and authorize the Executive Director or designee to implement procedures, procure qualified language services, update document inventories, and make non-substantive revisions consistent with controlling law and HUD requirements.

Table of Contents

1. 1. Policy Statement and Objectives
2. 2. Authority and 2025-2026 Regulatory Update
3. 3. Scope and Applicability
4. 4. Definitions
5. 5. Governance and Responsibilities
6. 6. Four-Factor Language Access Assessment
7. 7. Identification of Individuals Needing Language Assistance
8. 8. Language Assistance Services
9. 9. Vital Documents and Written Translation
10. 10. Oral Interpretation and High-Stakes Encounters
11. 11. Qualified Providers, Bilingual Staff, Family Members, and Minors
12. 12. Digital, Telephone, Remote, and Public Meeting Access
13. 13. Program-Specific Implementation
14. 14. Emergency, Safety, VAWA, Relocation, and Due Process Communications
15. 15. Notice of Free Language Assistance
16. 16. Procurement and Vendor Management
17. 17. Staff Training
18. 18. Complaints, Non-Retaliation, and Corrective Action
19. 19. Data, Privacy, Records, and Quality Assurance
20. 20. Monitoring, Performance Standards, and Annual Review
21. 21. Implementation and Revision Control

1. Policy Statement and Objectives

LHA will not discriminate on the basis of race, color, or national origin and will take reasonable, documented steps to prevent language barriers from denying meaningful access to its federally assisted housing programs, benefits, services, information, hearings, and other vital activities. Language assistance needed for meaningful access will be provided without charge to the individual.

- Identify language needs accurately and respectfully.
- Prioritize vital, safety-related, housing-stability, eligibility, rights, obligations, and due-process communications.
- Use qualified interpreters and translators appropriate to the importance and complexity of the interaction.
- Maintain consistent notices, records, quality controls, training, monitoring, and corrective action.
- Coordinate language access with disability effective-communication requirements without treating the two obligations as interchangeable.

2. Authority and 2025-2026 Regulatory Update

- Title VI of the Civil Rights Act of 1964 and HUD implementing regulations at 24 CFR Part 1.
- The Fair Housing Act and applicable national-origin nondiscrimination requirements.
- Section 504 of the Rehabilitation Act, the Americans with Disabilities Act where applicable, and effective-communication requirements for persons with disabilities.
- Program regulations, HUD notices, grant terms, Administrative Plan, ACOP, FSS Action Plan, relocation plans, VAWA policies, grievance/hearing procedures, and MTW requirements.
- Executive Order 14224, Designating English as the Official Language of the United States, issued March 1, 2025.
- HUD Notice PIH 2026-06, issued March 16, 2026, rescinding PIH Notice 2024-04 and confirming that PHA responsibilities under applicable federal language-access laws, including Title VI, remain.

GUIDANCE CONTROL

The former plan relied on Executive Order 13166 and treated HUD's 2007 LEP Guidance as current controlling guidance. Executive Order 13166 has been revoked. LHA may still use the four-factor framework, vital-document analysis, and qualified-service practices as prudent compliance and operational tools, but will verify the status of HUD guidance and controlling law during each annual review.

3. Scope and Applicability

This policy applies to all LHA departments, employees, commissioners, agents, contractors, management entities, instrumentalities, and programs when acting for LHA, including Public Housing, HCV, PBV, FSS, ROSS, MTW, RAD/relocation, homeownership, resident services, development, maintenance, procurement, finance, hearings, and public engagement.

4. Definitions

Term	Definition
Limited English Proficiency (LEP)	A person who does not speak English as the primary language and has limited ability to read, write, speak, or understand English in a particular encounter.
Meaningful access	Access that enables an eligible person to learn about, apply for, participate in, understand, and exercise rights and responsibilities in a program or activity.
Interpretation	Oral or signed transfer of meaning from one language to another.
Translation	Written transfer of meaning from one language to another.
Sight translation	Oral rendering of a written document into another language.
Vital document	A document containing information critical to obtaining or maintaining housing, assistance, services, rights, safety, or compliance with legal obligations.

Term	Definition
Qualified interpreter/translator	A person whose proficiency, accuracy, impartiality, confidentiality, terminology, and role competence are suitable for the encounter.
Language access coordinator	The official responsible for policy oversight, resources, training, monitoring, and corrective action.

5. Governance and Responsibilities

Role	Responsibility
Board of Commissioners	Adopt policy and receive material compliance updates.
Executive Director	Executive accountability; appoint coordinator; ensure resources and corrective action.
LEP/Language Access Coordinator	Maintain four-factor assessment, provider resources, vital document inventory, training, monitoring, complaints, and annual review.
Department Directors	Implement procedures, identify vital documents, budget services, and verify staff compliance.
Frontline Staff	Identify need, advise of free services, obtain qualified assistance, and document the encounter.
Procurement/Finance	Procure services, verify invoices, maintain contract controls, and monitor vendor performance.
IT/Communications	Support accessible portals, website notices, telephone routing, and approved translated content.

6. Four-Factor Language Access Assessment

LHA will complete and document an assessment at least annually and when material demographic, program, legal, or operational changes occur.

Factor	Required Analysis
1. Number or proportion	LEP persons eligible to be served or likely to be encountered, using reliable current sources and LHA encounter data.
2. Frequency of contact	Actual and anticipated contact by language, program, channel, location, and type of interaction.
3. Nature and importance	Consequences of misunderstanding or delay, especially eligibility, termination, eviction, relocation, safety, benefits, hearings, and deadlines.
4. Resources and costs	Available staff, vendors, technology, partnerships, translated materials, budget, urgency, and effective alternatives.

The 2025 plan cited a historical Polk County percentage and identified Spanish as the most common non-English language. This revised policy does not carry forward that percentage as a current fact. LHA will insert current verified Census/ACS, applicant, participant, encounter, and community information in the annual assessment.

7. Identification of Individuals Needing Language Assistance

- Allow voluntary self-identification of preferred spoken and written language at application, intake, recertification, orientation, relocation, hearing, and service contacts.
- Use “I Speak” cards, multilingual notices, qualified telephonic identification, or other reliable tools.
- Record preferred language and assistance needs in the authorized system without using language as an adverse eligibility factor.
- Do not require citizenship or immigration information merely to determine language preference.

- Reconfirm preference when circumstances suggest a change or before a high-stakes encounter.

8. Language Assistance Services

Service	Appropriate Use
Qualified in-person interpreter	Complex, sensitive, lengthy, legal, hearing, relocation, termination, or high-volume encounters.
Qualified video/telephone interpreter	Prompt assistance, uncommon languages, remote services, or emergency access.
Qualified bilingual employee	Only after LHA verifies language proficiency and role competence; routine bilingual ability alone is insufficient for high-stakes interpreting.
Professional written translation	Vital documents, standardized notices, policies, forms, rights, deadlines, and safety information.
Sight translation	Short documents when a qualified interpreter can accurately convey the content and written translation is not reasonably required.
Multilingual notice/tagline	Advises how to obtain free interpretation or translated vital information.

9. Vital Documents and Written Translation

Each department will maintain a vital-document inventory and assign priority based on the annual assessment. Translation decisions will be documented by language and document category. LHA will not apply a numerical safe-harbor threshold mechanically where the nature, importance, frequency, or risk supports additional assistance.

Priority	Examples	Minimum Control
Critical / immediate	Emergency, life-safety, disaster, emergency transfer, urgent relocation	Prompt qualified interpretation; translated materials where practicable; document delivery.
High / rights and housing stability	Application/denial, eligibility, termination, eviction, hearing, grievance, lease, inspection/abatement, relocation, VAWA, repayment	Professional translation or qualified interpretation appropriate to language need; track deadlines and understanding.
Routine / program administration	Appointments, recertification requests, rent notices, FSS/ITSP, maintenance access, resident meetings	Translated template or qualified interpretation based on assessment.
General / informational	Newsletters, optional events, outreach	Multilingual notice/tagline or translated summary based on audience and resources.

10. Oral Interpretation and High-Stakes Encounters

- Schedule qualified interpretation early and allow additional time.
- Brief the interpreter on purpose, confidentiality, terminology, and role.
- Speak directly to the individual, use plain language, short segments, and confirmation of understanding.
- Do not ask an interpreter to provide legal advice, advocacy, or independent decisions.
- Document provider, language, date, type of service, and any material difficulty.
- For hearings or testimony, use the level of competence required by applicable procedure and law.

11. Qualified Providers, Bilingual Staff, Family Members, and Minors

LHA will assess proficiency, accuracy, impartiality, confidentiality, terminology, and role boundaries. Certification is desirable and may be required where individual rights depend on precise interpretation.

FAMILY MEMBERS AND MINORS

LHA should not rely on family members, friends, children, adverse parties, landlords, or witnesses to interpret vital or sensitive communications. An adult chosen by the individual may assist only after LHA offers free qualified service, evaluates voluntariness and conflicts, and documents the decision. Minors will not interpret except in an unforeseen emergency until qualified assistance is obtained.

12. Digital, Telephone, Remote, and Public Meeting Access

- Post clear language-assistance information on websites, portals, offices, applications, and public notices.
- Design telephone menus or staff scripts so callers can obtain language identification and interpretation.
- For remote hearings, briefings, webinars, and meetings, test interpreter access, audio controls, document delivery, confidentiality, and contingency procedures.
- Public meeting notices will explain how to request interpretation by a stated deadline while allowing reasonable efforts for later requests.
- Machine translation may support triage or drafts but will not be the sole method for vital, legal, safety, or rights-based content without qualified human review.

13. Program-Specific Implementation

Program / Function	Priority Language-Access Points
HCV/PBV	Applications, briefings, voucher issuance, RFTA, inspections, rent, portability, terminations, informal reviews/hearings.
Public Housing	Applications, offers, leases, ACOP, rent, inspections, grievances, lease enforcement, eviction.
FSS/Resident Services	Recruitment, voluntary participation, CoP/ITSP, escrow, termination, referrals, confidentiality.
Maintenance/NSPIRE	Emergency work orders, entry notices, health/safety deficiencies, resident-caused damage, abatement.
RAD/Relocation/Development	Notices, advisory services, claims, moving options, meetings, temporary/permanent relocation, rights and appeals.
Procurement/Employment	Public-facing solicitations or employment processes when language access is required by controlling law or operational need.

14. Emergency, Safety, VAWA, Relocation, and Due Process Communications

LHA will prioritize qualified and confidential language assistance when delay or misunderstanding could affect safety, emergency response, shelter, VAWA rights, emergency transfer, relocation benefits, deadlines, termination, eviction, grievance, hearing, or appeal rights. Language assistance will be coordinated with disability accommodations and confidentiality protocols.

15. Notice of Free Language Assistance

- Post notices in reception areas, management offices, community rooms, websites, portals, and locations where applications or hearings occur.
- Include notices or taglines on identified vital documents and outreach materials.
- Inform applicants and participants orally when a language need is apparent.
- State that qualified language assistance is free and explain how to request it.

16. Procurement and Vendor Management

Language-service procurement will follow LHA's Procurement Policy and applicable federal, Florida, grant, confidentiality, cybersecurity, and records requirements.

- Define languages, modalities, response times, qualifications, confidentiality, pricing, invoicing, data security, complaint handling, and quality review.
- Prohibit vendor use of participant information beyond contract purposes.
- Require subcontractor flow-down and incident notification.
- Monitor missed requests, response time, accuracy concerns, complaints, invoice anomalies, and corrective action.

17. Staff Training

Audience	Minimum Training
All staff	Policy, identification, free services, prohibited practices, documentation, and escalation.
Frontline/intake/property/HCV/FSS	Service access, interpreter use, vital documents, plain language, encounter logging, emergencies.
Hearing/relocation/VAWA/legal functions	High-stakes competence, confidentiality, impartiality, records, and due process.
Managers/QA	Four-factor assessment, monitoring, complaints, vendor oversight, corrective action.
Bilingual staff	Role limits, verified proficiency, interpreting ethics, terminology, and when to use an external provider.

18. Complaints, Non-Retaliation, and Corrective Action

Individuals may report language-access concerns verbally or in writing to any LHA employee, the Language Access Coordinator, management, or an applicable civil-rights agency. LHA will provide assistance to make the complaint, will not retaliate, and will document review, interim safeguards, findings, response, and corrective action. Complaint filing does not replace any grievance, hearing, appeal, VAWA, fair-housing, or court deadline.

19. Data, Privacy, Records, and Quality Assurance

- Collect only information needed to provide and evaluate services.
- Restrict access to language preference, encounter notes, recordings, and sensitive records.
- Do not audio-record interpreted encounters unless authorized, necessary, noticed, and securely retained.
- Maintain translated master documents, version control, translator/reviewer information, approval date, and source-language version.
- Use back-translation, second review, field testing, or subject-matter review when risk warrants.
- Retain records under LHA schedules, HUD requirements, litigation holds, and applicable law.

20. Monitoring, Performance Standards, and Annual Review

Measure	Frequency	Standard / Management Target
Requests fulfilled	Quarterly	Track total by language, channel, department, and outcome.
Urgent interpretation access	Quarterly	Review all failures or material delays.
Vital document inventory	Annual	100% of departments reviewed.
Translated document version control	Annual	100% of active translated vital documents linked to current English source.

Measure	Frequency	Standard / Management Target
Staff training	Annual	100% of designated staff within required cycle.
Complaints and corrective actions	Quarterly	100% logged, reviewed, and closed or placed on an active plan.
Vendor quality	Quarterly/Annual	Review response, accuracy concerns, confidentiality, and invoices.
Four-factor assessment	Annual / material change	Completed and approved by Coordinator/Executive Director.

Management targets support oversight and do not narrow an individual's rights. LHA will revise services when demographics, encounters, complaints, laws, technology, vendors, program risks, or resources materially change.

21. Implementation and Revision Control

Action	Owner	Deadline / Trigger
Adopt policy	Board / Executive Director	09/21/2026
Appoint coordinator and departmental contacts	Executive Director	Upon adoption
Complete current four-factor assessment	Coordinator / departments	Before final operational rollout; annually thereafter
Validate vital document inventory	Department directors	Within first implementation cycle
Update notices and website	Communications / IT	After assessment and approved translations
Train staff	Coordinator / HR	At implementation and annually
Procure/confirm language vendors	Procurement	Before service gaps occur
Report annual results	Coordinator	Annually to Executive Director/Board as directed

Revision	Date	Description	Approval
FY 2027 Comprehensive Revision	09/21/2026	Replaces 2025 plan; addresses EO 14224, PIH 2026-06, Title VI controls, digital access, quality, monitoring, and appendices.	Resolution 26-1575

