



POLICY AND PROCEDURES FOR COMMUNICATION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Habitat for Humanity of Minnesota (Habitat Minnesota)

POLICY:

Habitat Minnesota will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits. This includes affiliate staff and board members and selected homebuyers who directly access our products or services, including but not limited to down payment assistance or other affordability gap (herein collectively called clients). The policy of Habitat for Humanity of Minnesota is to ensure meaningful communication with LEP clients and their authorized representatives. The policy also covers communication of information contained in vital documents, including but not limited to, loan closing documentation. All interpreters, translators, and other aid needed to comply with this policy shall be provided without cost to the LEP clients and will be informed of the availability of such assistance free of charge.

Language assistance will be provided through LanguageLine Solutions. Habitat for Humanity of Minnesota will hold a contract with the LanguageLine, utilizing it as necessary for LEP clients and assuming all costs associated with use of the line. All Habitat Minnesota staff will be provided with this policy, and staff that may have direct contact with LEP clients will be trained on how to access the line.

Language assistance through Habitat Minnesota is only available for Habitat Minnesota clients that seek access to Habitat Minnesota programs, products and services. As such, Habitat affiliates are required to have their own internal LEP policies and/or processes if working with direct homebuyers through the selection, homebuilding, and mortgage closing processes and referring on to Habitat Minnesota for down payment assistance or any other direct form of loan. If affiliates are unable to secure translation or interpretive services for a household, Habitat Minnesota will support the affiliate to find a local solution, or may allow the affiliate to access our LanguageLine contract and will invoice the affiliate for the cost of use when not connected to the Habitat Minnesota product or service.



Habitat Minnesota will conduct an annual review of the language access needs of our clients, as well as update and monitor the implementation of this policy and these procedures, as necessary.

PURPOSE AND AUTHORITY

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for staff to follow when providing services to, or interactive with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to the success of our mission to bring people together to build homes, community and hope.

STAFF COMPLIANCE

All Habitat Minnesota staff are subject to this policy, and staff that have direct contact with LEP clients will be trained on how to access the line to provide free language assistance services to LEP individuals and provide information about available language assistance services.

IDENTIFICATION AND ASSESSMENT OF LEP COMMUNITIES

Meaningful access is free language assistance in accordance with federal guidelines. In order to determine the level of access needed by LEP persons within its service jurisdiction, Habitat Minnesota will periodically assess and update the following four-factors:

- The number and proportion of LEP persons eligible to be served, or likely to be served, by Habitat Minnesota programs, loan products or services.
- The frequency with which LEP individuals come into contact with Habitat Minnesota.
- The nature and importance of the Habitat Minnesota program, activity or service to people's lives, and
- The resources available to Habitat Minnesota and overall costs.

PROCEDURES:

1. IDENTIFY LEP PERSONS AND THEIR LANGUAGE



Habitat Minnesota will promptly identify the language and needs of the LEP person through providing notice to all clients. In addition, when Salesforce records are kept of past interactions with clients, the language used to communicate with the LEP person will be included as part of the record.

2. PROVIDE NOTICE TO LEP PERSONS

According to the U.S. Census, 12% of the state's population (older than five) speaks a language other than English at home. The state's most common LEP languages are Spanish, African languages (of which Somali is most prominent) and Hmong. Habitat Minnesota will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. Notices will be available in Spanish, Hmong, and Somali based on volume, proportion, and frequency of previous clients served and as the most prevalent languages throughout the state. Notices will be posted in Habitat Minnesota offices, on the HUB (Habitat Minnesota's Intranet for Habitat for Humanity affiliate use), and will be sent to every homebuyer applicant accessing direct funding through Habitat Minnesota.

3. OBTAINING A QUALIFIED INTERPRETER

Habitat for Humanity of Minnesota Lending Strategies Director is responsible for overseeing staff that interface directly with LEP clients. As such, management oversight:

- (a)** Will have regular check-ins with staff about any current clients needing access to LanguageLine and seek updates on how the process and procedures are being implemented;
- (b)** Will annually review the LEP policy to ensure it is still appropriate and meeting the needs of Habitat Minnesota LEP clients;
- (c)** Will oversee and maintain the contract with the LanguageLine.

Some LEP clients may prefer or request to use an informal interpreter. However, an informal interpreter requested by the LEP client will not be used as interpreters unless specifically requested by that individual, **after** the LEP client has understood and that an offer of an interpreter at no charge to them has been made, and/or Habitat Minnesota assesses competency of desired interpreter. Such an offer and the response will be documented in the client's file. If the LEP



client chooses to use an informal interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person through the LanguageLine.

In other cases, the LEP client may already be working with an outside or other interpreter or translator. If the LEP client opts to continue to work with the locally provided language assistance instead of working with two separate interpreters or translators, Habitat Minnesota will evaluate issues of competency, confidentiality, privacy, and conflict of interest, and if no issues arise, the LEP client may continue to work with the locally provided interpreter or translator regarding Habitat Minnesota programs, products and services.

4. PROVIDING WRITTEN TRANSLATIONS

When translation of loan closing documents is requested, in lieu of providing translated documents, the LanguageLine will be used during a scheduled closing and the LanguageLine translator will interpret the documents and instructions audibly to the clients.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, Habitat Minnesota will assess changes in demographics, types of services, or other needs that may require reevaluation of this policy and its procedures. In addition, Habitat Minnesota will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, and feedback from clients.