

# **GARFIELD COUNTY HOUSING AUTHORITY**

## **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

**Adopted by Board – April 29, 2015  
Reviewed by Admin April, 2016  
Reviewed by Board April, 2017  
Full Staff Training HUD Fair Housing LEP and Board review – March, 2018**

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### **Contact Information:**

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## **Introduction**

It shall be the policy of the Garfield County Housing Authority (GCHA) to ensure that persons with Limited English Proficiency (LEP) are not discriminated against nor denied meaningful access to and participation in the programs and services provided by the Housing Authority. In order to ensure meaningful access and participation for LEP persons, GCHA shall notify such persons that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the provisions of the GCHA's LEP Plan as described below.

The LEP Plan and Policies that follow shall apply to all of GCHA's programs, services and facilities, regardless of whether they receive Federal financial support or not.

It is the intent of GCHA, in providing language services to LEP persons, to achieve a balance that ensures meaningful access to programs and services while not incurring undue burdens on Housing Authority resources.

GCHA has designated its Executive Director as its LEP Language Services Manager. This employee shall provide oversight for the implementation of the LEP Plan and Policies, coordinate and facilitate delivery of LEP language services, ensure that staff receives appropriate training on LEP policies and procedures, and direct the ongoing monitoring and periodic assessment of the LEP Plan and Policy's effectiveness.

## **Definitions**

**Limited English Proficiency person.** Any person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such person or persons shall be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit, or encounter.

**Vital document.** Any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include, but are not limited to, applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services.

**Interpretation.** The act of listening to spoken words in one language (the source) or orally translating it into another language (the target).

**Translation.** The replacement of a written text from one language into an equivalent written text in another language. It is noted that some LEP persons cannot read in their own language and back up oral interpretation services may be needed for written documents.

**Four-Factor Assessment.** This is an assessment tool used by the Recipient of federal funding to determine the extent of its obligation to provide LEP services. These four factors are: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided the program to people's lives; and (4) the resources available to the grantee/recipient and costs.

**Who Is Covered?** HUD's regulations, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban development – Effectuation of Title VI of the Civil Rights Act of 1964," requires all recipients of federal financing assistance from HUD to provide meaningful access to LEP persons. Title VI of the Civil Right Act of 1964 prohibits discrimination on the basis of race, color or national origin. Because language, like culture, is so closely linked to national origin, HUD's final LEP guidance points out that "failure to ensure that LEP persons can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination."

Pursuant to Executive Order 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the LEP Guidance of the Federal Register (FR-4878-N-01) are to additionally apply to programs and activities of federal agencies, including HUD. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipients programs and activities. To do this, the recipient should: (1) conduct the four-factor assessment; (2) develop a language access plan (LAP); and (3) provide appropriate language assistance.

Recipients of HUD assistance include:

- Public Housing Authorities
- Sub-recipients also if receiving State Community Development Block Grant (CDBG) and/or HOME grants.

Coverage under Title VI, Executive Order 13166, and HUD's regulations extends to a recipient's entire program or activity, (i.e., to all parts of a recipient's operations). This is true – even if only one part of the recipient receives the federal assistance.

## **Identification of LEP Persons Who Need Language Services Assistance**

GCHA shall use the following methodology and data sources to identify and determine the number of LEP persons currently using the Housing Authority's services, the number of LEP persons in the Housing Authority's area of operations who may be eligible for programs and services and the particular languages used by both parties.

1. The Housing Authority will use various methods to identify LEP persons with whom they have contact. These will include:
  - Current and past experiences with LEP persons encountered by staff. The number and type of such encounters will be periodically tabulated and analyzed to determine the breadth and scope of the language services required. In this analysis, consideration will be given to minority language populations that are eligible, but may have been underserved because of existing language barriers. To facilitate these encounters, notices will be posted in the lobby of the main office. The posted notice will be in commonly encountered languages and should encourage LEP persons needing language assistance to self-identify.
  - The Housing Authority shall analyze data from the Modern Language Association ([www.mla.org](http://www.mla.org)) regarding languages spoken in Garfield County as well as the ability to speak English "well" or "very well" as self-identified by speakers of various languages within the County.<sup>1</sup> If more current data is available through the **Census Bureau**, that data will be included in the assessment. As part of its assessment, the Housing Authority may also utilize the Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance available at [www.lep.gov/selfassesstool.htm](http://www.lep.gov/selfassesstool.htm). Data may also be assessed, when available, from State and local governments, Department of Health and Human Services, school districts, community organizations, including faith-based organizations, and legal aid entities.
2. As part of the implementation of its LEP Plan and Policy, GCHA will utilize information provided by applicants and current program participants on application and review documents and recorded in Housing Authority electronic records to determine the types of languages used and the levels of proficiency with English for each household.
3. Data from other community-based organizations.

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<sup>1</sup> MLA Data is 5-year aggregate to 2005; therefore, GCHA need is based on most **recent ACS data**.

- The use of Self-identification through the application form. The Housing Authority will document within the application form that the applicant has been informed of their right to language services at no cost, identify their primary language, and whether or not they would like an interpreter or prefer to receive documents translated into their primary language.

### **Frequency of Contact With LEP Persons**

In conjunction with research to identify LEP persons in the Housing Authority's area of operations, GCHA shall also compile information regarding the frequency of contact with LEP persons. The more frequent the contact, the more likely that language services for a specific language group will be needed. Measures necessary for a program that serves a LEP person one time or occasionally will necessarily be different from those that serve LEP persons every day. While less frequent contact suggests a different, less intense solution, some services may still be necessary for times when a LEP person occasionally seeks services.

GCHA shall also provide language services in the conduct of its outreach efforts, which are intended to make the general public aware of its programs and services. In this manner, LEP persons who are a part of the population in the Housing Authority's area of operations will have an equal opportunity to learn about the Housing Authority's programs and services and to access and participate in them.

Typically, whenever the Housing Authority intends to hold a public event of any type, a phone number is provided for persons who will require interpretive services in order to participate in the event.

### **Nature and Importance of the Program or Services**

GCHA recognizes that, within the range of programs and services it provides, some programs and services are more important than others. While it is the Housing Authority's intent to provide meaningful access to all participants and eligible persons, the availability of resources may limit the provision of language services in some instances.

Activities such as outreach intake forms, leases, rules of occupancy, legal actions, life and safety notes, and the like have a high priority. Information about and an understanding of these activities such as recreation programs, social activities, optional meetings, and related areas are of a lesser importance and hence a lower priority. The Housing Authority will develop a listing of all activities related to its programs and services and a matrix showing the relative importance of each. Based upon this analysis, the Housing Authority shall determine how language services to LEP persons shall be delivered for each activity.

### **Types of Language Services To Be Provided**

The data collected under research into the various language groups in the Housing Authority's area of operations shall be specific enough to inform staff as the variety of language groups for whom interpretation and translation services are needed. Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population, the Housing Authority shall

provide language services as indicated.

The Housing Authority shall provide Spanish language services to LEP persons by a variety of methods based upon the relative numbers of such persons and the frequency of contacts or anticipated contacts. Reasonable steps shall be taken to accomplish this, but at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population, presently known by the Housing Authority, the Authority shall provide Spanish language services as indicated below:

<b>Provision of Written Language Assistance</b>	<b>Language Group(s)</b>	<b>Determination</b>
Translate Vital Documents	<ul style="list-style-type: none"> <li>Spanish</li> </ul>	Based upon American Community Survey (ACS) data, there are more than 1,000 speakers of these languages who self-identify that they speak English
		“not well” or “not at all” within the Housing Authority’s
Translated Written Notice of Right to Receive Free Oral Interpretation of Documents	<ul style="list-style-type: none"> <li>Spanish</li> </ul>	Based upon the Housing Authority’s past experience with LEP persons encountered by GCHA staff, these are the most common languages for which interpretation is requested.
No Written Translation Required	<ul style="list-style-type: none"> <li>All Others</li> </ul>	While no written translation is required for other languages under the LEP Plan, the Housing Authority shall continue its practice of providing oral interpretation when requested by applicants/participants of its programs.

**Procurement of Interpretation and Translation Services for LEP Persons<sup>2</sup>**

The following methods of providing interpretation and translation services shall be considered and used based upon the assessment of need for the Housing Authority:

1. Contracting with qualified interpreters and translators, either individually or through an organization which provides such persons when other Housing Authority employees are not available or not skilled (Essential when accuracy and details are important or critical).

<sup>2</sup> Exhibit 4 - Contact Information for Spanish Language Interpreters / Translators

2. Centralizing language services and/or sharing language services with other Housing Authorities if/when available. (Useful to minimize costs.)
3. Using telephone (or video conferencing) interpreter services. (Useful when prompt delivery of interpretation services is required.)
4. Using community volunteers (either individuals or community service agencies that provide services to one or more language groups.) (Useful when language service needs are less important or informal.)
5. Pooling resources and/or standardization of documents and forms. (Useful to minimize costs.)
6. Use of and/or hiring bilingual staff who handle the majority of the verbal and written translation duties for the Housing Authority (Essential in the daily operations).
7. Using family members or friends. (Useful when language service needs are least important or informal.)

The Housing Authority shall explore the most cost effective means of delivering competent language services before limiting services due to resource limitations or concerns. In the process of deciding which services shall be provided, the Housing Authority shall thoroughly document the process used in arriving at the determination of which services are to be provided to which groups. This documentation shall be maintained in Housing Authority records to demonstrate compliance with the LEP Guidance issued by HUD (December 19, 2003).

#### **Quality and Competency of Language Services:**

The Housing Authority shall make every reasonable effort to assure that the language services it provides to LEP persons are of the highest quality and that the competency of interpreters and translators is appropriate to the situation. This would, generally, be used outside of the use of internal bilingual employees.

1. Interpreters (outside the use of internal bilingual employees). Oral interpretation of encounters, interviews, meetings, and the like require a certain level of competency and professionalism on the part of the interpreter. These characteristics do not necessarily exist in a person who is simply bilingual. Likewise, formal certification, while helpful, may not always be required. Often the importance of the encounter or the consequences will direct the level of professionalism needed. For example, a grievance hearing or court hearing regarding a lease termination may require a certified interpreter while a meeting at a resident's home about a minor neighborhood complaint may not.

When using an interpreter, the Housing Authority shall use the following general criteria to ensure



effective communications with LEP persons:

- a. Demonstrated proficiency in and ability to communicate information accurately in both English and in the other language, and able to identify and employ the appropriate mode of interpreting (consecutive, simultaneous, summarization, or sight translation.)
- b. Knowledge in both languages of any of any specialized terms or concepts peculiar to the Housing Authority's program or services and of any particularized vocabulary and phraseology used by the LEP person.
- c. An understanding of and ability to follow confidentiality and impartiality rules to the same extent that the Housing Authority employee for whom they are interpreting or to the extent that their position requires or both.
- d. Understanding of and adherence to their role as interpreter without deviating into a role as counselor, legal advisor, or other role.
- e. Awareness of regionalisms (dialects) used by the LEP persons for whom they are interpreting.
- f. Certification of interpreters' skills and abilities when individual rights depend upon precise interpretation.

When interpretation is needed and reasonable, it shall be provided in a timely manner and appropriate place so as to avoid the effective denial of a benefit or service. The importance of the benefit or service to meaningful access to programs and services will dictate the urgency of providing the language service may be reasonably delayed.

2. Translators (outside the use of internal bilingual employees.) When selecting translators, the list of criteria applied to determine competency and professionalism for interpreters above shall be applied to the extent that those criteria are appropriate. Translation skills can be very different from those of interpretation. When vital documents are involved, the Housing Authority will use professional translators or translation associations. Translated documents may be checked by a second translator or translated back into English by a second party to confirm accuracy.

#### **Documents Used by the Housing Authority**

The Housing Authority shall conduct an initial review of its written documents that are generally available to and used by the general public, applicants, and residents for the purpose of assessing the importance of those documents to its clientele, including LEP persons. This analysis shall be based upon HUD's "Four Factor

Assessment” that is found in the Notice regarding guidance on LEP persons. The four factors are: 1) the number or proportion of LEP persons encountered or eligible to be served; 2) the frequency of contact; 3) the nature of importance of the program or activity; and 4) the resources available to the Housing Authority and the costs. Based upon this analysis, a determination shall be made as which documents shall be translated and into which languages. This may range from word for word translation of legal notices to the simple inclusion on other less important documents of a notice in various languages that translations or interpretations may be available upon reasonable request.

At a minimum, GCHA shall provide written translation of vital documents for LEP language groups that constitute 5% or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be encountered by the Housing Authority. Translation of vital documents into other languages that do not meet this criterion may be provided orally if, and when, needed. If there are fewer than 50 persons in a language group that meets the 5% level, the Housing Authority will not translate documents, but will instead provide a written notice in the appropriate language of the LEP group of the right to receive competent oral interpretation of the written materials free of cost.

The Housing Authority shall develop and maintain a register of interpreters and translators classified by their level of qualifications for staff to use when language services are required for LEP persons.

#### **Type and Frequency of Notice to LEP Persons**

GCHA shall provide appropriate notice to LEP persons and language groups of the availability of free language services that ensure meaningful access to programs and services provided by the Housing Authority. Based upon the results of research into the language groups that are encountered in the Housing Authority’s area of operations, notices in those appropriate languages informing LEP persons and groups shall be posted in common areas, offices, and anywhere that applications are taken. These notices shall explain how to receive language services.

- Notices shall be included on or with outreach documents and tagged onto the front of commonly used materials.
- Notices shall be distributed to grass roots and other community-based organizations, particularly the Garfield County Human Services Commission, informing LEP persons of the Housing Authority’s programs and services and of the availability of free language services needed.
- Telephone answering messages and voice mail menus shall include brief notices in the most commonly used languages.
- Other notices may be posted, as determined appropriate, in local newspapers in commonly used languages and in non-English periodical publications in the area of operations, on non-English radio or television programs, and in schools, State and local governmental offices, and other locations where LEP persons may see them.

### **Training for Staff Persons**

GCHA shall provide training to its staff in its LEP Plan and Policies. A determination of the frequency of staff encounters with LEP persons shall dictate the level of detail of this training. Staff having the greatest contact shall be trained to effectively implement the Plan and Policies through the use of standardized procedures. Those staff having the least amount of contact with LEP persons shall, at a minimum, be trained to be fully aware of the Plan and Policies so that they may reinforce its importance and ensure implementation by other staff.

Training on the LEP Plan and Policies with levels of detail appropriate to job responsibilities shall be included in new employee training and orientations.

### **Monitoring Compliance, Assessing Performance and Revisions<sup>3</sup>**

GCHA shall monitor implementation of the LEP Plan and Policies on an ongoing basis, making revisions to policies and procedures as may be required periodically. The Housing Authority shall also review (not less than annually) the overall effectiveness of its LEP Plan and Policy. This review shall consider information from the following sources and criteria as well as other factors as may be appropriate:

1. Changes in demographics, including new language groups and changes in the proportion of existing language groups, types of services, and other needs.
2. Frequency of encounters with LEP persons.
3. Whether existing language services are meeting needs of LEP persons.
4. Availability of new resources, including technology.
5. Whether identified sources for assistance are still available and viable.
6. How well staff understand and have implemented the LEP Plan and Policies
7. Feedback from the community at large and from minority language groups and persons.

Bases upon findings of the periodic review, the Housing Authority shall revise the LEP Plan and Policies to ensure its effectiveness in meeting the access and participation needs of LEP groups and persons. Staff shall document revisions to LEP Plan and Policies as they are necessary and the reasons therefore.

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<sup>3</sup> See Exhibit 6 – Monitoring Checklist

## **Exhibit No. 1 – Language/Alternate Format Designation Form**

### **Garfield County Housing Authority Language/Alternate Format Designation**

The GCHA (GCHA) wants to provide effective communication and services to all its clients. This includes persons with disabilities, and persons who do not speak English.

The purpose of this form is to gather information to help us serve you better.

#### **Kinds of Communication**

- I do not need written materials in a different format.
  - I need written materials in the following format:
    - Large Print: **This is 18 point font.**
    - AUDIOTAPE: Text is recorded on an audiocassette tape.
    - Braille: Written text is provided in Braille.
    - Electronic format: Written material saved as “plain text” on a CD-Rom or 3.5”disk.
    - Spoken: Written material is read aloud by a GCHA employee, in person or over the phone.
  - I need a sign language interpreter.
  - Other (please explain)
- 

#### **Your Language**

- I speak English and read English and do not need help communicating with the GCHA
- I speak English, but I need help filling out paperwork.
- I do not speak or read English, and I need written materials in:
  - Spanish
  - Other: \_\_\_\_\_
- I do not speak or read English, and I need written materials in:
  - Spanish
  - Other: \_\_\_\_\_

**I have read this form, or it has been read to me.**

Print Name: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

## **Exhibit No. 2 – HUD’s List of “Vital” Documents**

The following table lists the forms determined to be vital at the present time and the languages that they will be translated to:

<b><u>FORMS</u></b>	<b><u>LANGUAGES</u></b>
Authorization for Release of Information/Privacy Act Notice (HUD- 9886) Request for Tenancy Approval (HUD-52517) Tenancy Addendum (HUD-52641-A)	Spanish

GCHA will review forms and documents on an annual basis and as new forms are introduced, and determine whether they are “vital” or “non-vital.” Vital documents may include intake and reexamination forms, the lease and tenant rules for the public housing program, critical or emergency notices to tenants, the notices of denial, termination, etc. Other documents that may be considered as “vital” and therefore need to be translated are the Grievance Procedures and Reasonable Accommodation Procedures associated with the various programs. The GCHA has translated its “vital” documents into Spanish. Translations of “vital” documents into other community languages are not required at this time, but this requirement will be reviewed annually.

The failure to provide written translations, under the circumstances outlined above, will not necessarily mean noncompliance with Title VI and Section 188. If the written translation of a certain document or set of documents would be so financially burdensome as to defeat the legitimate objectives of the provider’s program or activity, and there is an alternative means to provide the LEP persons with meaningful access to the information, such as timely oral interpretation of vital documents, this may suffice when reviewing the program or activity in its totality.

The GCHA will give careful consideration to the safe-harbor guidance when deciding which documents to provide in written form in languages other than English.<sup>4</sup>

<b>Documents provided by GCHA in Spanish</b>	<b>Office</b>	<b>Web Page</b>
Overview of HCV S8 Program	✓	
Pre- Application / Application	✓	✓
Briefing Documents	✓	
NMK Group Briefing Video	✓	
NMK Family Handbook	✓	

<sup>4</sup> Exhibit 5 – Full List of Spanish Language Documents in Briefing Packet

## **EXHIBIT NO. 3 – LEP Staff Training**

The Garfield County Housing's (GCHA) effective commitment to LEP Plan and Policies requires a trained and knowledgeable staff. As a result, GCHA staff should know their obligations to provide meaningful access to information and services for LEP persons. To be effective, the GCHA LEP Plan includes the following training parameters:

- Staff should know about LEP Policies and Procedures, and how to implement them.
- Staff should be aware of proper noticing requirements for LEP persons, to include posting of signs in common areas, stating in outreach documents that language services are available from the GCHA, and using the telephone voice mail menu, etc.
- Staff should be aware of the types of language services available (i.e., interpretation and translation).
- Staff should be trained on how they can obtain these services for their LEP clients.
- Staff should be trained on how to respond to LEP callers.
- Staff should be trained on how to use HUD's Language-Identification ("I Speak") Cards.
- Staff should be trained on how to respond to written communication from LEP persons.
- Staff having contact with the public need to be trained to work effectively in-person and with telephone interpreters.
- Staff should be trained on how to respond to LEP persons who have in-person contact with recipient staff.
- Staff should be trained to know how to ensure competency of interpreters and translation services.

The GCHA will provide a one-time orientation of these policies and procedures to all its employees in public contact positions. Training will be provided to new employees as part of their orientation. The more frequent the contact with LEP persons, the greater the need will be for in-depth training. Staff with little or no contact with LEP persons may only have to be aware of the LEP Plan. However, management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff.

The Section 8 Coordinator will be responsible for monitoring and managing the LEP program. In addition to periodic review of LEP language-assistance practices and procedures, updating staff on more effective ways to serve LEP clients and the laws, rules and regulations pertaining to LEP clients, he/she will maintain a "training registry" that records the names, dates, and type of LEP program-related employee training.

To assure the success of the language assistance program, the Section 8 Coordinator should monitor the LEP program periodically, but not less than annually, to assess the effectiveness and efficiency of its program. This monitoring may include, but need not be limited to:

1. Systematic feedback from LEP clients;
2. Systematic feedback from staff;
3. Periodic in-house reviews of the current communications needs of LEP clients; and
4. Periodic contact with community-based organizations that provide services to LEP clients.

## Exhibit No. 4 – Interpreter and Legal Document Translator

### Interpreter

**Claudia Flores (970) 985-9307**

Email: [Claudia@rmser.org](mailto:Claudia@rmser.org)

<b>Conference Call:</b>	<b>To Leave Conference Call:</b>
CONF	CONF
Confirmation tone ( #9)	Confirmation Tone
Desired Phone No.	On-hook (hang up)

Confirmation tone

Talk with multiple parties

Claudia is available for interpretation services (spoken word) and non-legal translations

### Translator (for written translations of Legal Documents)

Morgan Wyrick

Text: (970) 445-7990

Email: [wyrickmg@gmail.com](mailto:wyrickmg@gmail.com)

- Attach document and email to Morgan with deadline

## **Briefing Packet Contents in Spanish**

Additional Adult Living In Unit	Over Income Letter
Certification of Applicant Briefing	Portability
Certification of Applicant Briefing	Pre-Briefing Letter
Child Support	Pre-Qualification
Confirmation Letter	Public Request for Arrest Information
Declaration of Citizenship	Reasonable Accommodation Request
Direct Deposit Authorization Agreement	Removal Confirmation Letter
Fair Market Rents	Reporting Requirements
Family Reporting Form	Statement of Understanding
Full Rental Assistance Application	Summary of Colorado Law
Ha Authorization for Release Of Information	Termination of Rental Assistance
Interested Landlords	Termination of Rental Assistance
Invitation Letter	Translation Cover Letter
Landlord Guide to HCV	Translator Needed – Spanish
Landlord Obligations	Utility Allowance
Listing Of Family Members Not Contending	VAWA Signature Page
Residency Status	VAWA Statement
Medical Deductions	Voucher Expired Letter
Notice of Accessible Units	

HUD Available Forms in Spanish On Line	
HUD Form 1141 – Is Fraud Worth It	
HUD Form 52641 - HAP	
HUD Form 52517 - RFTA	
HUD Form 9886 – Auth. Release of Information	
HUD Form 92006 – Optional Contact	
HUD Form 52675 - Debts	

OTHER: Section 8 HCV Brochure in Spanish

(GCHA will periodically review and update this list based on participant needs and HUD notices as an administrative function.)



## Monitoring Compliance, Assessing Performance and Revisions

2015 – Staff review of Plan		
Board Adopted LEP	Interpretation Services	Translation Services
2016		Brochure & HUD Docs (online)
2017		
January-17	3	Full Briefing Packet
February-17	4	
March-17	1	
April-17	2	
May-17	4	
June-17	2	
July-17	2	
August-17	4	
September-17	1	
October-17	2	
November-17	3	
December-17	2	
2018		
January-18	0	
February-18	2	
March-18	2	Staff Training & Board approved revisions
April-18	1	
May-18	2	
June-18	2	
July		
August		
September		
October		
November		
December		