



# **CITY OF NASHUA, NH**

LANGUAGE ASSISTANCE PLAN  
for  
Addressing Limited English Proficiency  
In HUD Assisted Programs

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**City of Nashua, New Hampshire  
Language Assistance Plan  
for Addressing Limited English Proficiency  
in HUD Assisted Programs**

## **I. Background**

This Plan covers language assistance for limited English proficient individuals for the City's U.S. Department of Housing and Urban Development (HUD) funded programs. Federal law prohibits discrimination based on national origin, which includes discrimination based on a person's inability to speak, read, write or understand English. As a recipient of federal funds, the City of Nashua must provide meaningful access to limited English proficient (LEP) persons for our federally assisted programs and activities.

Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency", requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to...federally conducted programs and activities by eligible LEP persons...".

## **II. Definitions**

- Interpretation – The act of listening to a communication in one language and orally converting it into another language, while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training, and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.
- Translation – The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.
- Bilingual – The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.
- Direct Communication – Monolingual communication in a language other than English between a qualified bilingual employee or other bilingual person and an LEP individual (e.g., Spanish to Spanish).

## **III. Who is a Limited English Proficient (LEP) Individual?**

A Person who does not speak English as their primary language and has a limited ability to read, write, speak, or understand English can be limited English proficient.

- Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but may have difficulty with some of these areas.
- LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information, such as describing their housing needs and/or issues in English.

## **IV. Framework for Deciding When Language Services are Needed**

The City will use HUD's four factor analysis to determine when a LEP individual may need language assistance to ensure meaningful access to our federally assisted programs, services and activities.

Certain departments, due to the nature of services they provide, must provide greater LEP services than others. The City's Fire Department, Police Department, Division of Public Health and Community Services and Transit Department all have very different needs than most other federally supported departments. As such, each of those departments utilizes their own LEP plans.

**Factor 1:** The number or proportion of LEP persons eligible to be serviced or likely to be encountered by the City:

The Census Bureau has a range of classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all.' This plan considers people that speak English 'not well' or 'not at all' as Limited English Proficient persons.

According to data from the Census 2005-2009 American Community Survey, English is spoken by 80% of the City's population and only 7.5% of Nashua's total population is limited English proficient, meaning the majority of individuals who speak a non-English language can speak English well or very well. Certain census tracts have higher concentrations of LEP individuals and several of these same census tracts have the highest concentrations of low-income households. This connection is important because low-income households are those most likely to participate in the City's federally assisted programs.

Table 1 shows the number and percent of persons in regards to their English language skills for Nashua, NH and those census tracts that have 7% or higher LEP. The table shows the top four languages spoken within the City.

Table 1

Location	Predominately Low-Income	Total % Who are Limited English	% LEP Speak Spanish	% LEP Speak Portuguese	% LEP Speak South East Asian Languages
Nashua, NH		7.5%	3.2%	1%	0.5%
Tract 102		9.6%	3.7%	1.4%	0.1%
Tract 105	✓	8.7%	8.7%	0%	0%
Tract 106	✓	9.8%	5.3%	1.7%	0.7%
Tract 107	✓	17%	11.8%	3.9%	0%
Tract 108	✓	16.4%	12.9%	0%	1.9%
Tract 111		8.6%	1.8%	4.1%	0%
Tract 112		7%	1.8%	0%	1.3%
Tract 114		13.9%	0.8%	0.4%	0.6%

Source: U.S. Census Bureau, 2005-2009 American Community Survey

**Factor 2:** The frequency with which LEP persons using a particular language come in contact with the City:

Table 1 above highlights the most frequently spoken languages in the City. Additionally, the City's census tracts with the highest concentrations of poverty were noted. Although our federal programs are available to any qualifying participant, anywhere in the City, it can be surmised that the people *most* likely to be served live within the census tracts noted in Table 1. Looking at Census Tracts 105-108, Spanish is the predominant non-English language spoken.

Based on the data above, we estimate coming in contact with Spanish speaking LEP individuals with moderate frequency, Portuguese speaking LEP individuals on a limited basis and other LEP individuals only rarely to never.

Factor 3: The nature and importance of the program, activity or service provided to the person's life:

The federally assisted programs covered by this plan are predominately funded by the U.S. Department of Housing and Urban Development (HUD). The programs are generally related to housing, economic development, community development, public service support and community development. The HUD programs predominately benefit low to moderate income persons.

Denial or delay in accessing the City's HUD funded programs, services or information provided by the City would not have life threatening implications for a LEP individual. This assessment is made in comparison to services, such as emergency transportation, fire protection, police protection and other emergency services.

However, denial or delay in accessing certain programs may have a strong impact to an LEP individual's life. Examples include housing programs that address emergency repairs due to sewage issues, leaking roofs, heating system failures, lead poisoning and displacement due to other unsafe living conditions

Factor 4: The resources available to the City and costs associated with different language service options:

The City will offer the opportunity for meaningful access to LEP clients. If a client asks for language assistance, or if staff identifies a client who needs assistance, the City will make reasonable efforts to provide free language assistance. There are several resources and options available to the City's departments implementing federal programs.

## **V. Language Assistance Measures**

### **Oral Interpretation Services:**

Contracted Services: The City of Nashua has contracted with Language Line Services, Inc. to provide confidential telephonic interpretation services for more than 170 languages and simple "point to language cards" to assist the employee in determining the language spoken. This service is available to any City employee who encounters a non-English speaking individual. Language cards are kept at all points where the public may access services.

In House/Staff Services: Depending on the circumstances, reasonable oral interpretation assistance might be offered through a bilingual employee or representative of the client (family member, friend, etc). It is the LEP individual's decision whether to use family members or friends as interpreters. Extra caution will be exercised when the LEP person chooses to use a minor. The City will ensure that the LEP person's choice is voluntary, that the LEP person is aware of the possible problems if the preferred interpreter is a minor child, and that the LEP person knows that the City will provide a competent interpreter at no cost to the LEP person. No adverse action would be taken using anyone under the age of 18 as an interpreter.

Walk-ins and individuals at a front desk/counter that need interpretation services: Identify the language service required using the "I Speak" cards. If the language is Spanish, attempt to locate a bi-lingual staff person. If none are available or the City does not have a bi-lingual staff person, access the Language Line Services, Inc using the instructions provided by the company.

Individuals calling the City that need interpretation services: Callers who are limited English proficient often have an English speaking person present when they call. Ask that English speaking person to identify the language need of the caller. Contact a supervisor who will arrange for interpretation services at an agreeable time for all parties.

## **Written Translation Services**

The City will work toward translating vital documents/written materials and most commonly used forms into the Spanish and Portuguese, the top two identified languages. The use of “tag lines” on correspondence will be used to advise recipients to contact the City if they cannot read the English document.

If a written document is not translated, arrangements will be made for a bi-lingual person to orally translate the document line-by-line. If the language needed is an uncommon or infrequent language, the City will arrange written translation. This service will not provide immediate information, as it will take time to hire and pay a translator.

## **Deciding Which Language Assistance Option to Use**

The types of language assistance resources the City decides to use will depend on the circumstances and may be different for different types of activities. The City has Spanish speaking bi-lingual staff who often provide interpretation services for in-person encounters. For more rarely-encountered languages, telephonic or contract interpretation may be a preferred option.

## **Outreach Efforts**

The City of Nashua encourages all of its citizens to participate in the development of its Consolidated Plan, Annual Action Plan, any substantial amendments to the Consolidated Plan and Consolidated Annual Performance and Evaluation Report (CAPER). The City especially encourages participation by low and moderate-income persons, particularly those living in slum and blighted areas, as defined by HUD, and in areas where CDBG funds are proposed to be used by implementing the following strategies:

1. Hold meetings in low-income target neighborhoods. Particular focus will be paid to the neighborhoods known locally as the *Tree Streets* and *French Hill*. These neighborhoods have the highest density of low-income residents and include the following census tracks: 105, 107, 108 and parts of 104 and 106. Notices of public meetings affecting the residents of predominately low-income neighborhoods will be posted in locations easily accessible to the residents, translated into alternate languages as appropriate.
2. Conduct surveys by mail, phone or door-to-door techniques, ideally by bi-lingual persons and at a minimum provided in written format in alternate languages.
3. Use the internet to access those residents least likely or unable to participate in public hearings. The internet will provide convenient access for all residents to participate in the development of the above Plans.
4. When feasible, notify residents of Consolidated Plan activities through various media sources, such as local public access channel and social media, postings within target neighborhoods (local markets, community centers, etc).
5. Solicit views of non-profit and service agencies.
6. Hold public meetings at fully accessible locations. Additionally, the City will provide interpretation, hearing and/or vision impaired services with five (5) days advance notice to the Urban Programs Department.
7. Encourage the Nashua Housing Authority (NHA) and its tenants to participate in the development and implementation of the above Plans, along with other low income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the LHA about relevant consolidated plan activities so that the LHA can make this information available at their annual public hearing.

## **VI. Training Staff**

Training is critical so that staff understand how to access and competently provide language services. Supervisors will conduct initial and periodic training for staff coming into contact with LEP persons. Training will include:

- An in-depth discussion of the plan
- How to respond to LEP callers
- How to respond to written communications from LEP clients
- How to respond to LEP clients who contact the Authority in person
- How to use the "I Speak" cards
- How to use the Language Line Service
- Which staff and outside vendors are available for interpretation at appointments
- The location of translated documents

Supervisors will provide bilingual staff with additional training that will address:

- How to adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles
- The specialized knowledge of the area of service or programs that LEP clients are applying or participating (if necessary)
- How to be competent and knowledgeable in providing interpretation that preserves confidentiality

## **VII. Providing Notice to LEP Individuals**

Once the City has decided, based on the four factor analysis above, we will provide language services, it is important to let the LEP individual know the services are available free of charge. The City already has signs, translated into common languages, posted in common areas provided through the contract with Language Line Services, Inc. Other examples of notifications will include: "tag" lines on outreach materials and common documents; working with schools, grassroots, faith-based and community organizations to inform LEP individuals of language assistance services; and through the outreach efforts listed in Section V., Language Assistance Measures, above.

## **VIII. Monitoring**

The City will monitor and update this Language Assistance Plan by reviewing programs and the language resources available at least once per year (or as appropriate). The City will use the Annual Action Plan process to allow public input and make adjustments as necessary and appropriate to ensure meaningful access and to reflect improved approaches to providing language access. The City will consider changes:

- In the affected LEP population in the housing jurisdiction or geographic area served
- Frequency of encounters with LEP language groups
- Availability of resources, including technological advances
- Effectiveness of services offered to LEP individual's needs
- Whether the resources identified are still available and viable