
HOUSING AUTHORITY OF THE CITY OF SEATTLE
MANUAL OF OPERATIONS

SUBJECT: Interpretation and Translation Policy

SCOPE: This policy applies to all housing programs administered by SHA.¹

POLICY: The Seattle Housing Authority (SHA) shall endeavor to mitigate communication and language barriers to SHA resources for people who receive housing benefits from SHA or who are applicants to SHA programs and whose proficiency in the English language is limited.

IMPLEMENTING POLICY:

Definitions:

Participants means all applicants for SHA programs and all residents of SHA housing.

Limited English Proficient (LEP) means a limited ability, on the part of participants who do not speak English as their primary language, to read, write, speak or understand English. [FR-4878-N-01]

Executive Order 13166 (August 11, 2000) addresses assistance to recipients of federal financial assistance who have limited English proficiency in order to improve access to services for these individuals.

Translation means replacing written text in English with equivalent written text in another language.

Interpretation means replacing spoken or written text in English with equivalent oral text in another language.

IMPLEMENTING POLICY:

A. Identifying Need for Language Assistance

SHA shall elicit and record language service needs from all participants.

B. Methods of Language Assistance

SHA shall provide language assistance using methods that are time-tested, user-friendly, and cost-effective, including but not limited to:

- a. Contracting with qualified agencies or individuals for translation services
- b. Contracting with qualified agencies or individuals for interpreting services

¹ This policy is adopted in part to implement Executive Order 13166. It draws on guidance from HUD's "Notice of Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (December 19, 2003). This document was developed after considering the factors for determining appropriate assistance specified in the Guidance: a) the number or proportion of LEP Persons served or encountered in the eligible service population; b) the frequency with which LEP individuals come into contact with the program; c) the nature and importance of the program, activity, or service provided by the program; d) the resources available to the recipient and costs. (See also L17.2-2, "Effective Communication policy," regarding assistance to Deaf/Hearing Impaired/Blind persons.)

- c. Utilizing bilingual staff members who can communicate with participants
- d. Utilizing community resources, partnerships, and other relationships

C. Translation of Written Information

1. Vital documents shall be translated into selected languages.²
2. SHA shall regularly review and assess its written materials to determine which materials should be classified as “vital documents” that, if not understood, will result in the loss of housing. NOTE: The State of Washington requires that legal documents, including leases, be written in English. For this reason, SHA will not translate dwelling leases, addenda and riders.
3. Non-vital documents may be translated.

D. Interpreting Services

1. SHA shall to the extent possible provide qualified and/or certified interpreters and communication assistance to LEP participants who require such assistance to conduct formal SHA-related business such as interviews, leasing, annual or interim recertifications, conferences, grievance hearings and meetings. SHA cannot guarantee the availability of professional interpreters in all languages spoken by SHA residents or applicants. In some instances residents or applicants may be required to provide their own interpreters. Resident interpreters should not be used to conduct formal SHA business during which personal or confidential information is disclosed and neither should minors.
2. SHA is obligated by its service agreements and contracts with professional interpreters to pay a minimum fee for interpreter services. If a participant fails to appear for a scheduled appointment or meeting for which an interpreter is provided, SHA will require the participant to reimburse SHA for the cost of the interpreter.

If the meeting at which the participant failed to appear is rescheduled, the participant will be required to pay the cost of the interpreter for the second meeting or provide his or her own interpreter. It is at the supervisor’s discretion to waive this requirement for situations of hardship or extenuating circumstances beyond the participant’s control.

E. Staff Training

SHA shall provide information and training to make staff aware of the need to provide participants the interpretation and translation services required by this policy.

² SHA uses information from participant-identified needs for language assistance and interpreter usage to identify the languages most commonly spoken by its beneficiaries.