



Town of Islip Housing Authority

LEP/LAP/FAIR HOUSING PLAN

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It is the policy of the Islip Housing Authority to comply fully with all federal, state and local non-discrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment.

The Town of Islip Housing Authority shall not deny any individual or family the equal opportunity to apply for or to receive assistance under the Public Housing or Housing Choice Voucher Program on the basis of race, color, sex, gender identity, religion, creed, national or ethnic origin, age, familial status sexual orientation or disability.

To further its commitment to fully comply with applicable civil rights laws, Islip Housing Authority will provide information about federal, state and local regulations and ordinances to program applicants and participants regarding unlawful discrimination and about any recourse available to persons who believe they are victims of housing discrimination. The information will contain the names of the government offices which take complaints and perform investigations, including HUD's Office of Civil Rights. Such information will be made available during the application process and the family briefing session, and all applicable Fair Housing information will be made part of the briefing packet and upon request at the Administrative Offices of the Islip Housing Authority.

All Housing Authority staff will receive training about the importance of affirmatively furthering fair housing and providing equal opportunity to all persons, including providing reasonable accommodations to persons with disabilities. Fair Housing posters are on display in the Islip Housing Authority offices.

Islip Housing Authority's offices and public areas are accessible to persons with disabilities. Accessibility for the hearing impaired is provided through .

I. INTRODUCTION

A. Federal and HUD Guidelines

On August 11, 2000, President William Clinton signed Executive Order 13166, entitled Improving Access to Services for Persons With Limited English Proficiency, which took effect August 16, 2000 for the Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons With Limited English Proficiency. The Order states “each Federal Agency shall work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.” Persons with Limited English Proficiency (LEP) are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.¹ Under the order, each federal agency is required to draft guidance specific to its recipients detailing general standards that will be applied.

In 2003, the Department of Housing and Urban Development (HUD) issued guidelines that were finalized on January 22, 2007². These guidelines apply to

¹ January 22, 2007 HUD Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting limited English Proficiency Persons – Who is a Limited English Proficient Individual?

² See footnote 1 above.

any recipient of HUD assistance, including, but not limited to, public housing agencies and assisted housing providers. Under the 2007 HUD Guidelines, recipients are required to make all of their programs accessible to Limited English Proficiency (LEP) persons. LEP persons within the scope of the guidelines include persons seeking housing assistance; persons seeking supportive services to become first-time homebuyers; persons seeking housing-related social services, training, or any other assistance from HUD recipients; current public housing or Section 8 tenants; or parents or family members of these persons. The Guidelines set forth four factors to be balanced by recipients of Federal Funding when assessing the needs of and services to be provided to LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program;
2. The frequency with which LEP individuals come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to the LEP population; and
4. The resources available to the grantee/recipient and the costs of providing LEP assistance.

Based upon this four factor analysis, a recipient decides the nature and extent of language assistance it is able to provide and develops an implementation plan.

B. Compliance

Compliance with the 2007 HUD Guidelines is voluntary. However, recipients of Federal Funds, including the Town of Islip Housing Authority (hereinafter referred to as IHA), are required to comply with civil rights-related laws and programs and to provide meaningful access to LEP persons. Complaints filed with HUD of discrimination based on national origin due to failure to provide meaningful access will be investigated. Continued failure to provide meaningful access will result in the withdrawal of HUD funding.

C. Definitions

1. **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.

2. **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.
3. **Interpretation.** The act of listening to spoken words in one language (the source) and orally translating it into another language (the target).
4. **Translation.** The replacement of a written text from one language into an equivalent written text in another language. Note: Some LEP persons cannot read in their own language and back up oral interpretation services may be needed for written documents.
5. **Four-Factor Assessment.** This is an assessment tool set forth by HUD to be 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.

II. FOUR FACTOR ANALYSIS

1. The number or proportion of LEP persons in the Town of Islip eligible to be served or likely to be encountered by the program.

When reviewing demographic data to analyze language assistance needs, it is important to focus on the languages spoken by those who are not proficient in English, and not simply individuals who speak multiple languages. According to the U.S. Census Bureau 2006-2010 American Community Survey, there are

90,163 persons in the Town of Islip 5 years and older who speak a language other than English³.

Of those 90,163 persons, 68,731 speak Spanish, 16,882 speak other Indo-European languages, 3,285 speak Asian and Pacific Islander languages, and 1,265 speak “other” languages.

Of those persons who speak a language other than English, 47,217 speak English less than “very well,” that is, they are limited English proficient (LEP) persons. Of those persons who are limited English proficient, **38,304** speak Spanish, 7,114 speak Indo-European, 1,450 speak Asian and Pacific Islander languages and 349 speak “other” languages. The number of Spanish speaking individuals clearly passes the Language Assistance Plan Federal threshold test of greater than 1000 persons or 5% of the total population; the only other language groups which meet this Federal threshold are French Creole, with a population of **2208**, and Portuguese or Portuguese Creole **1,092**.

2. The frequency with which LEP individuals come into contact with the program.

Clearly there are Spanish speaking persons in the community who may come into contact with the Islip Housing Authority and, indeed, 24.6% of persons currently assisted by the Islip Housing Authority are Hispanic.⁴ This percentage is higher than the percentage of Spanish speaking individuals in the Town of Islip who identify themselves as limited English proficient (15.11%) and higher than the number of individuals 5 years and older in the Town of Islip who speak Spanish (22%).

The management of the Islip Housing Authority has reviewed the frequency with which its staff members come into contact with LEP persons. The Housing Authority employs a Spanish speaking staff member who communicates with individuals requesting assistance in Spanish. However, more often than not, LEP individuals communicate through their own English speaking family members. The requests for assistance in Spanish are not frequent, usually numbering 4-8 per month. However, a slight increase in this number, approximately up to 10-12 per month in most recent months, has led to the supposition that the number of requests for Spanish language assistance is growing. There are rare requests, less than one per year, for assistance in a language other than Spanish. This information is derived from records and call logs maintained by the IHA, from interviews of staff by

³ U.S. Census Bureau -2005-2009 American Community Survey-5 Year Estimates-Language Spoken at Home by Ability to Speak English for the Population Five Years and Over.

⁴ Town of Islip Housing Authority 2011 Demographic Data Report

management, and from review of the current waiting lists and of the Public Housing and Housing Choice Voucher tenant lists.

3. The nature and importance of the program, activity, or service provided by the program to the LEP population.

As identified above, there are concentrations of LEP Spanish speaking individuals in the Islip Housing Authority service area. Housing Authority Staff are most likely to encounter LEP individuals in the Housing Authority Office. All housing related programs are considered of vital importance to the participants and to the public, and, as such, will be given priority in providing access to LEP individuals.

Programs not directly related to housing or to someone's right to housing are considered non-vital. LEP assistance in accessing these programs will be on an as needed basis.

4. The resources available to the grantee/recipient and costs of providing LEP assistance.

The IHA shall provide oral translation services to LEP persons requesting and/or requiring these services and shall give notice that these services are available free of charge. The IHA shall also provide translation of vital documents to LEP persons. Priority will be given to translation of the application form and the updating of the Islip housing Authority website and application to provide immediate meaningful access to LEP individuals. The IHA maintains language assistance notices and cards in its Administrative Offices, and it is the policy of the IHA to offer translation services free of charge to LEP persons who request and require such assistance. Language assistance in the form of translation of documents other than vital documents, even though not required, shall be provided to LEP persons who require and/or request such assistance.

III. LEP ACCESS PLAN

A. Policy Statement

1. Policy

It is the policy of the IHA to provide timely meaningful access for limited English proficiency (LEP) persons to all IHA programs and services. The IHA is committed to its mission of empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout the Town of Islip. In keeping with this mission, the IHA is adopting this revised Language

Access Plan (LAP), in order to insure that LEP persons are not discriminated against, or denied meaningful access to and participation in, the programs and services of the IHA.

2. Purpose

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 Housing Authority personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency. Following these guidelines is essential to the success of our mission to remove barriers, and provide equal access, to public housing for all LEP persons served by the Islip Housing Authority. It is the goal of the IHA to provide meaningful language assistance within the parameters of its budget and resources.

B. Identification of LEP Communities

The LEP persons in the area served by the IHA are identified above in the Four Factor Analysis. Of the languages spoken by the residents of the Town of Islip, there are 3 languages that are spoken by the LEP threshold population size of 5% or 1,000 persons. Those languages are:

Spanish: **38,304**; French Creole: **2,208**; Portuguese: **1,092**

Tracking to date of inquiries received and persons assisted reveals that only a minimal number of LEP persons contact the IHA and all of those are Spanish speaking. The IHA does not have a record of inquiries from LEP individuals who speak French Creole, Portuguese or Portuguese Creole.

C. Language Assistance Measures

The IHA serves the LEP community with oral interpretation and written translation services for the Housing Choice Voucher and Public Housing programs, as well as community outreach and notice of language assistance services.

1. Oral Interpretation Services

The IHA will serve LEP persons with oral interpretation services that include but are not limited to the following services:

- a. Spanish/English Bilingual Staff - Bilingual staff members who communicate "in-language" to LEP individuals, or who serve as interpreters or translators will be assessed and will receive regular training on proper interpreting and translation techniques, ethics, specialized terminology, and other topics as needed. Without regular assessment and training, bilingual staff may not be able to provide

the language access services necessary to ensure LEP individuals have meaningful access to IHA's programs and services.

- b. Free interpretation services offered through contract vendor. Any contract for language assistance services will specify responsibilities, assign liability, set pay rates, and lay out the ways in which difficulties or disputes are resolved. For example, contracted language assistance service providers must have:
 - i. qualified and competent translators and interpreters, including mechanisms to ensure confidentiality and avoid conflicts of interest;
 - ii. an ability to meet the agency's demand for interpreters;
 - iii. an ability to meet the agency's demand for translation;
 - iv. reasonable cancellation fees;
 - v. on-time service delivery;
 - vi. an acceptable emergency response time;
 - vii. rapid rates of connection to interpreters via the telephone, electronically, or by video; and
 - viii. effective complaint resolution when translation or interpretation errors occur.
- c. Special HCV and PH Briefings offered in Spanish to LEP clients.
- d. LEP persons are permitted to use interpreters of their own choosing. However, effective 8/1/2012, minors will not be allowed to be used as interpreters. This will increase the potential for accuracy during interpretation and minimize the withholding of confidential information that may affect participant rights.

2. Written Translation

The IHA will provide written translations of the documents determined to be "vital" to assist with access to IHA's housing programs by LEP persons. The written translations will be provided in the languages that meet the threshold requirements within the Town of Islip, or found most commonly among IHA program participants and public contacts. At the time this Plan is formulated, the only language other than English that is common among program participants is Spanish. The List of Vital Documents was developed with consideration of the applicable Fair Housing laws. Oral interpretation services will be used for all other documents not listed as Vital Documents and languages that do not

meet the threshold requirements or are not commonly found among program participants.

- a. Vital Documents Already Translated into Spanish by IHA:
 - i. Pre-Application
 - ii. Frequently Asked Questions
 - iii. "I Require Assistance in Another Language"
 - iv. "I Need Assistance/Message" Document

- b. Documents Designated By HUD As Vital Documents
 - i. Authorization for Release of Information/Privacy Act Notice (HUD-9886)
 - ii. Request for Tenancy Approval (HUD-52517)
 - iii. HAP Contract (HUD-52641)
 - iv. Tenancy Addendum (HUD-52641-A)
 - v. Family Self-Sufficiency (FSS) Program Contract of Participation (HUD-52650)
 - vi. FSS Escrow Account Credit Worksheet (HUD-52652)
 - vii. Statement of Homeownership Obligations (HUD-52649)
 - viii. "A Good Place to Live"

The documents designated by HUD as "vital documents" have already been translated by HUD into Spanish and are available for use in the Administrative Offices of the IHA.

- c. Other Vital Documents to Be Translated By IHA Upon Request of Program Participant or Identification of an Immediate Need:
 - i. Application/Recertification Packet:
 - *Notice to Applicants and Participants
 - *OMB Form 2577-0266: Debts Owed to PHAs
 - *Housing Assistance Fraud Notice
 - *VAWA Notice
 - *FSS Program Contract*
 - *PIH information Notice
 - *HUD Form 92006: Contact Person Supplement
 - *Emergency Access Authorization Form
 - *Instructions for Mail-In Recertification
 - *Application
 - *HUD Form 9886: Authorization Release of Info*
 - *IHA Form: Authorization for Release of Info
 - *School/Student Status Form
 - ii. Housing Offer and Lease

- iii. HCV Voucher
- iv. HCV Contract
- v. Acknowledgement of Program Violations
- vi. 14 Day Notice
- vii. Request for Informal Hearing
- viii. Program Termination Letter
- ix. Request for Reasonable Accommodation
- x. Notice of Public Hearings

* Documents already translated by HUD and identified in b. above

3. Expand Accessibility Services

The IHA will expand the Language Assistance services to the Authority Owned and Housing Choice Voucher users with the use of Spanish bilingual employees at property offices, telephonic interpretation services, and noticing through multilingual posters in property offices and “I Speak” cards for clients to self-identify as an LEP person and to identify the language in which they are comfortable communicating.

4. Accessibility to Non-Vital Programs

All housing related programs are considered vital to participants and the public. Other programs not directly related to housing, or someone’s right to housing, are considered non-vital. While the accessibility to non-vital programs is important, it is not subject to the same standards as housing programs. Language assistance for accessing these programs will be offered through the use of bilingual employees and cost effective written translation programs available through the internet. Notice of these services will be provided on program documents issued to participants and the public.

Currently, the Ross Grant Coordinator provides written and oral notification of IHA sponsored events, services and programs for tenants in English and Spanish.

5. Notice of Language Assistance Services

The IHA will provide notice of the availability of its free of charge LEP Services. Notice shall be in the form of:

- a. Interpretation Service Posters in all offices in multiple languages.
- b. Bilingual (i.e. Spanish) option available on the automated phone system.
- c. "I Speak" cards available for clients to self-identify at all offices, in applications mailed to people pulled from the waiting list, and carried by the onsite maintenance team.
- d. Interpretation Service notice added to the IHA website, brochures, community notices, public notices, and other identified communications.
- e. Notices in local ethnic media.
- f. Language Access Plan available on the IHA website and at all offices.

IV. IMPLEMENTATION AND TRAINING

A. Persons Charged

While all IHA employees are responsible for ensuring LEP persons are provided adequate access to our information, programs and services, there are key individuals who specifically have the responsibility of implementing and monitoring this Language Access Plan. The Language Access Coordinator/Section 504 Coordinator is responsible for ensuring the IHA adheres to its policy, plan and procedures to provide meaningful language access. This person is responsible for the oversight, performance, and implementation of the plan. The Coordinator is also responsible for performing the annual plan evaluation and analyzing the survey responses and complaints of LEP persons as part of the evaluation process. Effective with the approval of this 2012 Language Access Plan, the Language Access Coordinator is the Assistant Director of the IHA. The Executive or Assistant Director, together with the Programs Coordinator, is responsible for implementing the Language Access Plan for the Public Housing Program and Authority Owned portfolio, as well as for the Housing Choice Voucher Program.

B. Implementation Time Frames

Implementation of the services, policies, and procedures for the IHA Language Access Plan is based on current program activities and available funding. The implementation deadlines are detailed below:

1. Oral Interpretation Services

- a. Translation services through use of Bilingual Staff – Spanish.

- b. New employees are subject to independent testing before they can be listed as bilingual employees.
- c. In addition, the IHA shall conduct an evaluation of the necessity and/or usefulness of hiring a full- or part- time employee who is certified to translate from English to Spanish and Spanish to English, subject to the availability of qualified applicants, Civil Service requirements and budget constraints. If this measure is implemented, it shall be implemented when practicable. If this measure has not been implemented by the time of the annual LAP review, the necessity and/or usefulness of such measure shall be re-evaluated at that time and either continued or expunged.
- d. Investigate possibility of offering ESL courses free of charge in conjunction with community outreach groups (like Family Service League, Adelante or LILAC for example) on site at the IHA.
- e. Free oral interpretation services offered through contract vendor.
- f. The IHA will issue a RFP in order to secure a permanent, effective oral translation service within the parameters of its budget.
- g. Special HCV and PH Briefings offered in Spanish to LEP clients as necessary.
- h. LEP persons permitted to use interpreters of their own choosing.
- i. Eliminate use of minors as interpreters.

2. Written Translation

- a. Translate Pre-Application and Frequently Asked Questions into Spanish through a certified translator, and revision of these documents to reflect IHA policies and procedures; and all posted on IHA website
- b. Spanish language I Need Assistance/Message Document maintained in office.
- c. Update IHA website to provide information and instructions in Spanish.
- d. Free written translation of vital documents through an on call certified translator.

- e. IHA will issue a RFP in order to secure a permanent, effective written translation service within the parameters of its budget.
- f. Vital program documents translated into Spanish through certified translator.
- g. Vital program documents available to be translated into other languages free of charge through contract vendor as needed.
- h. Non-vital documents translated free of charge on an as needed basis. (Based on the review of the languages meeting the threshold requirements in the Town of Islip and the infrequent number of requests for translated documents, and the anticipated cost of translation of a full set of documents, IHA shall translate additional documents as needed and/or requested by or on behalf of LEP individuals.)
- i. Spanish Language Pre-Applications provided to Community and Outreach Organizations in order to maximize contact with LEP persons.
- j. Notice of Open Application Period in Spanish Language Newspaper.
- k. Ross Grant Coordinator to provide Notice of All Services (e.g. food pantry, health and wellness, social opportunities, etc.) in Spanish.

3. Notice of Language Access Services

- a. Interpretation Service Posters in all offices in multiple languages.
- b. Bilingual options available on the automated phone system.
- c. "I Speak" cards in Administration Office.
- d. On Waiting List contact notices and through use of "I Speak" cards in applications for people pulled from the waiting list.
- e. Notices in Spanish on IHA website.
- f. Frequently Asked Questions on IHA Website – Spanish
- g. On Waiting List Application.

- h. Notice of Availability of Sign Language Assistance in Administrative Offices and on Website.

4. Plan Monitoring and Updating

- a. Record Keeping System. Log to be maintained by employees coming into contact with LEP persons
- b. Customer Service Survey
- c. Complaint Process. Forms maintained in Administration office
- d. Comment Form Available on IHA Website.

C. Training of Personnel

1. General Training

All IHA employees may at one time or another come into contact with either a participant or member of the public who may be an LEP person. All IHA employees will be trained in the following areas:

- a. LAP policies and procedures: All staff members will be directed to review the IHA LAP and become familiar with its content and with the IHA LAP Policy and Procedures.
- b. Types of services available to assist LEP persons including Notice of Assistance and Translation Services Available.
- c. How to respond to LEP callers: Staff shall be instructed to respond with sensitivity to LEP callers and how to identify possible LEP callers. Staff will notify LEP Coordinator and arrange for appropriate oral and/or written interpretation/translation as requested and needed.
- d. How to respond to LEP visitors: Staff shall be instructed to respond with sensitivity to LEP visitors and how to identify LEP visitors. Staff shall refer LEP visitors to “Interpreter Services” poster and to “Language Identification Flashcards” for purpose of identifying language requested. Staff shall also offer Spanish speaking LEP persons Spanish “I Require Assistance/Message” document maintained in Administrative offices and shall respond with appropriate oral and/or written interpretation as requested and needed.

- e. How to track and record languages encountered: Staff shall be instructed to record each LEP request made by a program participant or a member of the public, or on behalf of a program participant or a member of the public, including: the date and time; the name of the individual making the request; whether the request is oral or in writing; whether the requestor is a program participant, applicant or member of the public; the language requested; the type of service requested; the type of document requested, if applicable; and, any other information which would assist in tracking LEP request information.
- f. How to respond to complaints: Staff shall be instructed to record all complaints made by or on behalf of LEP persons and refer these complaints immediately to the LEP Coordinator.

2. Translation Services Training

Staff who are in a position where contact with LEP persons is likely to occur more frequently will also be trained on the following items:

- a. How to respond to written communication from LEP persons.
- b. How to access oral interpretation and written translation services.
- c. How to work effectively with interpreters in person and via telephone conference.

V. MONITORING AND UPDATING THE PLAN, POLICY AND PROCEDURES

A. Periodic Review

1. Monitoring

The IHA Language Access Plan will be monitored periodically and reviewed annually by the Language Access Coordinator. The Coordinator will review:

- a. LEP communities to be served in the Town of Islip;
- b. Languages most frequently used by program participants and public contacts;
- c. Implementation status;
- d. Effectiveness of services; and

- e. The availability of, necessity for, advisability of and cost of providing additional services.

2. Approval

Upon completion of the annual review, updates and revisions of the Language Access Plan will be submitted for approval by the Executive Director and the Board of Commissioners.

B. Key Areas of Review

1. LEP Communities to be Served

To evaluate the languages in the Town of Islip that meet the threshold requirements, information will be obtained from the U.S. Census Bureau, community based associations, and any other resources available.

2. Languages Most Frequently Encountered

- a. To determine the languages most frequently used by program participants and public contacts, IHA will implement a record keeping system that will track and record the following information:
 - i. Primary language used by person who contacted IHA.
 - ii. Method of contact, i.e. telephone, in-person, correspondence, web-based, etc.
 - iii. Type of assistance provided during encounter.
 - iv. LEP persons choice to use own interpreter and age of interpreter.
 - v. Documents, if any, requested to be translated, and language requested.
 - vi. Number of LEP persons served.
- b. This information will not only identify the languages IHA comes into contact with most frequently, but will also provide information useful for evaluating the effectiveness of the services provided.

3. Implementation Status

The status of implementing the services set forth in the July 1, 2012 LAP and implementation of new services will be evaluated and adjusted as necessary annually.

4. Effectiveness of Service

The IHA's efforts will be monitored and reviewed annually for effectiveness in providing meaningful access to housing programs. The effectiveness will be evaluated based on customer service surveys and any responses received through the Feedback Process available to the public for individuals who requested and/or were denied services for limited English proficiency. The Feedback Process will allow any member of the public, program participant, or past program participant to submit comments on a standardized comment form regarding the Language Access Services provided by the IHA. The comment form will be available on the IHA website (?) and at all IHA offices. The comments will be submitted to the Language Access Coordinator for review and follow up with the appropriate personnel, adjustments to the plan, and/or further action as deemed appropriate and necessary.

5. Availability and Cost of Providing Additional Services

Each year, the Language Access Coordinator will research and solicit ideas for new ways to serve LEP persons. An evaluation of the availability, cost, and potential effectiveness of the additional services will be performed and adjustments to the plan will be recommended accordingly.

6. Complaints

IHA employees who receive a report of a complaint, or become aware that a LEP person believes that he/she has not been provided with language assistance services, in accordance with the provisions of IHA's LAP should report that information to the LAP Coordinator and to the Office of Civil Rights. Posted Notices will advise LEP persons of this opportunity.

VI. COMMUNITY OUTREACH

The IHA will confer with LEP advocates and community organizations at least annually to discuss IHA's implementation of its LEP Access Plan and

to receive information on emerging LEP populations and current issues, as well as to ensure consistent and ongoing identification of LEP persons in the community. When appropriate, the IHA shall provide information to the public and to LEP communities through social, religious and civic groups regarding its language assistance services available free of charge. The IHA will maintain a relationship with community and outreach groups as necessary to provide effective language assistance in accordance with IHA policy, and will seek to develop new relationships with community, civic and religious LEP outreach groups as these are identified in the community. Current community and outreach groups with which the IHA has a working relationship: Family Service League, LILAC, and Adelante.

VII. PLAN APPROVAL

The Town of Islip Housing Authority is initially approved and reviewed annually by the HA for revisions and approved as necessary by the Board of Commissioners. Any discrepancies within these policies conflicting with applicable laws shall be deemed omitted and the most current applicable laws included by reference.