



HOUSING & REDEVELOPMENT AUTHORITIES
OF CUMBERLAND COUNTY

Better Places, Better Lives

**Redevelopment Authority of the
County of Cumberland (RACC)
Non-discrimination Policy**

Statement of Nondiscrimination

The Redevelopment Authority of the County of Cumberland (RACC) does not discriminate on the basis of race, color, national origin, disability, age, or sex in administration of its programs or activities, and, RACC does not intimidate or retaliate against any individual or group because they have exercised their rights to participate in actions protected, or oppose action prohibited, by 40 C.F.R. Parts 5 and 7, or for the purpose of interfering with such rights.

Mary Kuna, Executive Director is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Parts 5 and 7 (Non-discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Title IX of the Education Amendments of 1972; and Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (hereinafter referred to collectively as the federal non-discrimination laws).

If you have any questions about this notice or any of RACC's non-discrimination programs, policies or procedures, you may contact:

Mary Kuna, Executive Director
Redevelopment Authority of the County of Cumberland
114 N. Hanover Street, Carlisle, PA 17013
(717) 249-0789
mkuna@cchra.com

Staff Training on Non-discrimination

The following training will be provided to all staff:

- Information on the Nondiscrimination Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of interpreter service providers.
- Documenting how to handle language assistance requests.
- How to handle a potential discrimination complaint.

Language Accessibility Plan

This document concerning Limited English Proficiency has been prepared to address RACC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The assessment and strategies have been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, and its implementing regulations, which state that "no person shall be subjected to discrimination on the basis of race, color or national origin."

Policy Statement. It is the policy of the Redevelopment Authority of Cumberland County (RACC) to take reasonable steps to provide meaningful access to Limited English Proficient (LEP) individuals who are: (1) Seeking housing assistance from a public housing agency or assisted housing provider or are current tenants in such housing; (2) Seeking assistance from a state or local government for home rehabilitation; (3) Attempting to file housing discrimination complaints with a local Fair Housing Assistance Program grantee; (4) Seeking supportive services to become first-time homebuyers; (5) Seeking housing-related social services, training, or any other assistance from HUD recipients; and (6) Parents and family members of the above. This policy is to ensure that language will not prevent staff from communicating effectively with LEP applicants or clients and that individuals with LEP will not be prevented from accessing important programs and information; understanding rules; participating in proceedings; or gaining eligibility for housing programs. RACC is committed to extending its services and outreach to LEP populations.

Strategies for Providing Meaningful Access: RACC has developed these strategies to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by the RACC. LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This document outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To identify the demand for language assistance, RACC used the four- factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by ESC.
2. The frequency with which LEP persons contact RACC programs and services.
3. The nature and importance of services provided by RACC to the LEP population.
4. The interpretation services available to RACC and overall cost to provide LEP services.

Who Is Limited English Proficient (LEP)? Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be limited English proficient, or LEP, and may be entitled to language assistance with respect to a particular type of service, benefit or encounter. The RACC will elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the

RACC will give applicants or prospective beneficiaries a language identification card (or “I speak” card).

Language Assistance Provided: RACC will make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons. Language assistance that RACC might provide to LEP persons includes, but is not limited to: (1) Oral interpretation services; (2) Bilingual staff; (3) Telephone service lines interpreter; (4) Written translation services; (5) Notices to staff and recipients of the availability of LEP services; or persons.

Translation of Documents: The extent of the RACC’s obligation to provide written translation of documents will be determined by the RACC on a case-by-case basis, looking at the frequency of languages that are encountered and the totality of the circumstances surrounding the request. Because translation of a document is a one-time expense, consideration will be given to whether the upfront cost of translating a document (as opposed to oral interpretation) over the likely lifespan of the document is viable. Examples of documents that could be translated are: (1) Consent and complaint forms; (2) Intake forms with the potential for important consequences; (3) Written notices of rights, denial, loss or decreases in benefits or services, and other hearings; (4) Notices of eviction; (5) Notices advising LEP persons of free language assistance; (6) Notices of public hearings, especially those that meet Community Planning and Development’s citizen participation requirements; (7) Leases and tenant rules; (8) Applications to participate in RACC programs or activities or to receive benefits or services.

Discrepancies: In case of any conflict or discrepancies between the provisions of a translated document and the English version of a document, the English version of the document shall control.

Identified LEP in Cumberland County – as per census tract B16001 “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” Biggest language groups out of a total of 228,595:

Spanish/Spanish Creole: 4,018

German: 1,095

Other West Germanic: 2,014

Serbo-Croatian: 912

Hindi: 661

Chinese: 993

Korean: 813

Arabic: 935

French: 577

Provided below are several methods of language interpretation in the local area.

➤ International Service Center

21 South River Street Harrisburg, PA 17101

(717) 236-1523 or (717) 236-9401

Hours: Monday – Friday 8:30 AM – 5:00 PM

Language Support Services: Language interpretation requests can be emailed to languagebank@isc76.org or faxed to (717) 236-3821. For more information or to schedule an appointment contact Dr. David Chebbet at (717) 236-1523. The Language Bank of the International Service Center is a translation and interpretation fee-for-service available in the most commonly used foreign languages in Pennsylvania. The Language Bank enables service providers who are the direct or indirect recipient of government funds to meet the linguistic accessibility requirement of Title VI of the Civil Rights Act of 1964. Language capabilities: Albanian, Arabic, Bhutanese, Bosnian, Burmese, Cambodian, Chinese, Farsi, French, Gujarati, Haitian Creole, Hindi, Italian, Korean, Kurdish, Laotian, Polish, Punjabi, Romanian, Russian, Serbo-Croatian, Somali, Spanish, Swahili, Thai, Tigrinya, Turkish, Urdu, and Vietnamese. The International Service Center also provides other bilingual support services to disadvantaged and underprivileged people, on a first come first served basis and based on available resources.

➤ Foreign Interpreters Registry

HACC, Central PA's Community College
One HACC Drive 110 Blocker Hall Harrisburg, PA 17110
(717)780-2447

Referral by phone to language interpreters for the following languages: Dutch, French, German, Italian, Spanish, Swedish, Arabic, Chinese, Slovak, Polish, Russian, Vietnamese, Portuguese, Ukrainian, Filipino, Croatian, Créole/Haitian, Czech, Greek, Turkish, Hungarian, Jamaican, Japanese, Korean, Yugoslav, Hindi, Champa (ethnic Vietnamese) and Sign language.

➤ Certified Languages International

4800 SW Macadam Ave., Ste. 400 Portland, OR 97239
1-800-225-5254
www.certifiedlanguages.com

CLI is a GSA-approved vendor who serves federal, state, and local government agencies to ensure compliance with Title VI of the Civil Rights Act. Services provided are Telephone Interpreting, Video & Remote Interpreting as well as Document Translation. Fee-based. Language capabilities: Over 200 languages, including but not limited to Dutch, French, German, Italian, Spanish, Swedish, Arabic, Chinese, Slovak, Polish, Russian, Vietnamese, Portuguese, Ukrainian, Filipino, Croatian, Créole/Haitian, Czech, Greek, Turkish, Hungarian, Jamaican, Japanese, Korean, Yugoslav, Hindi, Champa (ethnic Vietnamese) and Sign language.

➤ Court Interpreters - Language Access Coordinators in Pennsylvania

Language Access Coordinators oversee the provision of language access services in their judicial district in compliance with all applicable laws and the district's policy. Contact these individuals if you wish to request an interpreter for your case or need assistance obtaining information in your language about court services in that particular district:

Cumberland County:

Trish Perkins, Cumberland County Courthouse
(717)240-6200
courtadmin@ccpa.net

Dauphin County:
Kristi Clingan, Dauphin County Courthouse
(717)780-6630
kclingan@dauphinc.org

Perry County:
n/a Use Cumberland or Dauphin county

➤ PA Office of Deaf & Hard of Hearing
<http://www.dli.pa.gov>

The Pennsylvania Office of Deaf & Hard of Hearing (ODHH) is an office within the Pennsylvania Department of Labor & Industry that serves all 67 counties. ODHH is your first stop on the path to learning about anything and everything related to hearing loss, such as services technology, sign language interpreters, or laws that require equal access for people who are deaf, deaf-blind or hard of hearing. ODHH provides an online registered interpreter database that enables clients & agencies to look for a specific interpreter by county & by certification.

Demographic Data Collection & Privacy Policy

RACC maintains an established system to collect, review, and regularly update demographic data for the populations served by its programmatic work. We hold this practice to better understand the profile of the communities in which we work to ensure that decisions about where and how our programs are administered are not discriminatory. As needed, the data is shared with our partners and funders as part of their monitoring and evaluation efforts.

At the outset of a new project serving a new population, demographic data is collected in an electronic format document, shared with the project team, and reviewed by project managers who analyze the data and form program design and implementation decisions based on a better of understanding the population served. This data is then reviewed and updated on a regular basis (semi-yearly or yearly depending on project duration) until the conclusion of the project.

Data Sources in Collection: RACC primarily utilizes demographic data generated by the US Census Bureau and the Department of Housing and Urban Development to collect and analyze accurate data on race, age, median income, housing status, and language spoken at home, among other demographic characteristics for communities where RACC is actively working. These data sources provide consistent data on base demographics of a given community that are understood in context of additional research and data.

Types of Data Collected: We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our programs and services,

when you participate in activities or programs we administer, or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and our services, the choices you make, and the communication methods you use. The personal information we collect may include the following:

- **Demographic Data** – Only as it relates to our programs and services. This information is not sold. This information may only be shared with partners and funders as required for monitoring and reporting requirements.
- **Sensitive Information** - We do not process sensitive information. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.
- **Information automatically collected** - Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our website.

Data Storage: Demographic data is saved in an electronic format document that is accessible to staff relevant to the program you are participating in.

Environmental Justice

Presidential Executive Order 12898, issued in 1994, directed every federal agency or one using federal funds to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority populations and low-income populations. Since taking office in January 2021, the Biden Administration issued Executive Orders 13985, 14008, and 14096 to further address the need to achieve environmental justice and equity across the federal government. The U.S. EPA defines the following terms that apply to Environmental Justice through policy. These U.S. EPA definitions are also being used by other federal agencies.

Environmental justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies.

Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Meaningful involvement means: People have an opportunity to participate in decisions about activities that may affect their environment and/or health.

- The public's contribution can influence the regulatory agency's decision.
- Community concerns will be considered in the decision-making process; and
- Decision makers will seek out and facilitate the involvement of those potentially affected.

Title VI of the Civil Rights Act prohibits discrimination based on race, color, national origin, disability, age, or sex. The Environmental Justice Executive Order continues to protect these groups, but expands its umbrella to include low-income populations.

Complaint and Grievance Procedures

If you have a complaint or grievance alleging possible discrimination of the operation of programs administered by the Redevelopment Authority of the County of Cumberland, the following procedures shall apply to your complaint or grievance. If you are a tenant or voucher recipient seeking an appeal, please contact your housing representative or property manager.

1. Filing of a Complaint:
 - a. Any individual who believes they have been subjected to discrimination in accessing the programs or services offered outside of the Housing Management Division and Housing Choice Voucher Program, you may file a complaint within 30 days of the date of alleged discrimination.
 - b. Complaints must be submitted in writing via email, mail or in person to:

Mary E Kuna
Executive Director
mkuna@cchra.com
114 N Hanover St
Carlisle PA 17013
2. Initial Review:
 - a. Upon receipt, the Executive Director will conduct an initial review to determine the nature and scope of the allegations.
 - b. Receipt of the complaint will be acknowledged within 72 hours business hours and initiate the investigation process.
3. Investigation:
 - a. The investigation will be conducted promptly, thoroughly and impartially.
 - b. Additional information may be requested from the complainant and any relevant parties.
 - c. Confidentiality will be maintained to the greatest extent possible throughout the investigation.
4. Resolution:
 - a. Following the investigation, the Executive Director will determine whether the complaint is substantiated based on available evidence.
 - b. If discrimination is found to have occurred, appropriate corrective actions will be implemented to remedy the situation and prevent future occurrences.
 - c. The complainant will be informed of the outcome of the investigation and any remedial actions taken in writing within 60 days of the filing of the complaint.

5. Appeals:

- a. If the complainant is dissatisfied with the outcome of the investigation, they may appeal the decision within 30 calendar days in writing via email, mail or in person to the Authority's Hearing Officer to conduct review of the original investigation.

Alison Lintal
Hearing Office
alintal@cchra.com
114 N Hanover St.
Carlisle, PA 17013

6. Documentation:

- a. All discrimination complaints and related investigative records will be maintained confidentially and securely.
- b. Documentation of complaints, investigations and resolutions will be retained in accordance with application Authority record and retention policies and procedures.