

LANGUAGE ACCESS PLAN



California Department of Housing and Community Development

2022

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INTRODUCTION AND BACKGROUND

PURPOSE

The California Department of Housing and Community Development (HCD) recognizes the rich diversity of California and is committed to achieve its mission “to promote safe, affordable homes and vibrant, inclusive, sustainable communities for all Californians”. Various federal and state civil rights laws, regulations and executive orders provide authority and guidelines related to the provision of services to all Californians, and HCD is committed to conducting business in a meaningful, non-discriminatory manner with all HCD customers.

This Language Access Plan is designed to assist HCD divisions and programs that directly serve the public by providing guidance on translation, interpretation, and outreach services for persons seeking access to HCD programs and activities. The first priority of the Language Access Plan is to improve access to critical services or activities for customers who are Limited English Proficient (LEP) and for persons who have disabilities.

In addition to this HCD-wide Language Access Plan, each division and/or program that directly serves members of the public must have a plan in place to provide equal access for LEP individuals and persons with disabilities to its programs, services and/or activities.

POLICY STATEMENT

It is the policy of HCD, as a recipient of federal financial assistance, to comply with Title VI of the federal Civil Rights Act of 1964. Additionally, HCD must comply with California’s Dymally-Alatorre Bilingual Services Act requirements to provide equitable, non-discriminatory access to information and services to all members of the public, and those of LEP groups that constitute a substantial number by law.

HCD follows state and federal equal opportunity guidelines in all business activities, such as contracting, loan underwriting, inspections, or enforcement. This policy mandates non-discrimination in all HCD business activities and full compliance with state and federal equal opportunity laws in conducting business activities related to achieving HCD’s mission.

HCD provides equal access to programs and information to persons with disabilities, as well as those with LEP, through interpretive services, alternate format documents and auxiliary aids to ensure effective communication.

WHO IS LIMITED ENGLISH PROFICIENT?

LEP are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English due to national origin.

PUBLIC DISSEMINATION OF TITLE VI INFORMATION

United States Department of Justice regulations, Public Dissemination of Title VI Information, requires recipients of federal financial assistance to publish or broadcast program information in the news media. Advertisements must state that the program is an equal opportunity program and/or indicate that federal law

prohibits discrimination. Additionally, reasonable steps shall be taken to publish information in languages understood by the population eligible to be served or likely to be directly affected by the program.

AUTHORITY AND GUIDANCE

FEDERAL AUTHORITIES

Section 601 of Title VI of the Civil Rights Act of 1964 provides that no person “on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” The United States Supreme Court in *Lau v. Nichols* (1974) stated that one type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English.

Title VI covers a recipient’s entire program and activity, which means all parts of the recipient’s operations are covered. Simply put, any organization that receives federal financial assistance is required to follow Executive Order 13166.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” was adopted to “...improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English Proficiency...”. This executive order is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to persons who are LEP. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English and requires recipients of federal financial assistance to:

- Publish guidance on how they can provide access to LEP persons.
- Improve the language accessibility of their own federal program.
- Break down language barriers by implementing consistent standards of language assistance amongst all recipients of federal financial assistance.

Section 504 of the Rehabilitation Act states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under” any program or activity that either receives federal financial assistance or is conducted by any executive agency. All recipients of federal funds are obligated to provide public accommodations in areas such as large font, braille, closed captioning, etc.

STATE AUTHORITY

The Dymally-Alatorre Bilingual Services Act (Act) requires all state departments involved in furnishing information or rendering services to the public, whereby contact is made with five (5) percent of non- or limited-English speaking people, shall employ a sufficient number of qualified bilingual persons in public contact positions to ensure information and services are provided in the language of the non- or limited-English speaking person. Each state agency shall conduct an assessment and develop and update an implementation plan. Each agency shall conduct a survey of each of its local offices every two years to determine all of the following:

- The number of public contact positions in each local office.

- The number of bilingual employees in public contact positions, and the languages they speak, other than English.
- The number and percentage of non-English-speaking people served by each local office, broken down by native language.
- The number of anticipated vacancies in public contact positions.
- Whether the use of contracted telephone-based interpretation services, in addition to bilingual persons in public contact positions, is serving the language needs of the people served by the agency.

Each division and/or program shall calculate the percentage of non-English-speaking people served by division, program and/or each local office by rounding the percentage to the nearest whole percentage point.

The Act was last amended in 2003 to include the Language Survey Implementation Plan that is due October 1 of every odd year to the California Department of Human Resources (CalHR). The Plan requires state departments to give specific information about its Bilingual Services Program and any corrective action taken to correct deficiencies found in its last language survey.

The California Civil Rights Act, also known as the Unruh Civil Rights Act, prohibits discrimination by agencies that receive state funds and requires them to provide equal access to benefits without regard to the beneficiary's race, color, national origin (language use), or ethnic group identification among other classifications.

COMPLIANCE WITH LIMITED ENGLISH PROFICIENT REQUIREMENTS

WHO MUST COMPLY?

Pursuant to Executive Order 13166, the meaningful access requirement of Title VI, the Title VI regulations, and the four-factor analysis set forth in the Department of Justice's (DOJ's) revised LEP Guidance, 67 FR 117 (June 18, 2002), apply to the programs and activities of federal agencies, including HCD. Federal financial assistance includes grants, cooperative agreements, training, and use of equipment, donations of surplus property, and other assistance. All programs and operations of entities that receive federal funds or assistance (recipients and sub-recipients) include:

- State agencies
- Local agencies
- Private and nonprofit entities
- All programs and operations of the federal government

All employees must ensure the public is treated with dignity and respect, identify the language needs for HCD's customers, and utilize available bilingual resources to assist customers, when needed.

DETERMINING THE NEED

PERFORM A SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS

As a recipient of federal funding, each division and/or program must take reasonable

steps to ensure meaningful access to the information and services it provides. By conducting their own four-factor analysis, divisions that directly serve the public will determine vital documents that will need to be translated. Divisional four-factor analyses are incorporated at the addendum portion of this plan.

In determining “reasonable steps” there are four (4) factors for programs to consider:

FACTOR 1: DEMOGRAPHICS

The decision to provide language assistance services must include an assessment of the number or proportion of LEP persons from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. Generally, identifying any community where the LEP population equals five (5) percent or more in any given language automatically triggers providing language assistance services as a mandatory and normal part of your program operation.

There are a variety of sources for demographic information. The U.S. Census Bureau is one potential source. Detailed information about the racial and ethnic populations you serve or might serve, including the languages involved, can also be found in U.S. Department of Education data from school enrollment. U.S. Census Bureau, Department of Education and other helpful demographic data for California can be found at www.lep.gov/maps by selecting the Demographic Data link. You may also go to <http://data.census.gov/> to access numerical data and mapping tools down to census block groups. Community-based organizations can also help you identify language needs in the communities that you serve.

FACTOR 2: FREQUENCY OF LEP CONTACT

Each division and their respective program areas must consider how often various language groups come in contact with the program. Furthermore, they must consider how their programs or activities affect LEP persons in each service area and should have the flexibility to tailor their actions to those needs. The greater the frequency equals the greater the need for enhanced language services. For example, frequent contacts with Spanish-speaking people who are LEP requires bilingual Spanish-speaking staff. Less frequent contact with other language groups suggests a different and less intense approach.

For programs where public outreach or involvement is central to HCD’s mission, staff must consider whether appropriate outreach to LEP persons could increase the frequency of contact with those groups, triggering a higher level of language assistance.

FACTOR 3: NATURE AND IMPORTANCE OF THE SERVICES PROVIDED

Once the program has assessed what languages to consider by looking at demography and frequency of contact, look at the nature and importance of your programs, activities, and services that you provide to that population. The more influential the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP persons, the more likely language services will be needed. Suppose the denial or delay of access to services or information could have serious implications for the LEP person. In that case, procedures must be put into place to provide language assistance to LEP persons as part of standard business practices.

FACTOR 4: RESOURCES AND COST

Identify available resources to ensure you can provide language assistance to LEP

stakeholders participating in your programs or activities. The frequency and importance of contacts will dictate the level of language services you should commit to providing. A variety of language services must be provided at little or no cost, such as using bilingual staff as interpreters. Programs must carefully explore the most cost-effective means of delivering competent and accurate language services.

SAFE HARBOR STIPULATION

Federal law provides a Safe Harbor stipulation so that federal funding recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A Safe Harbor means that if a recipient provides written translations (as under circumstances outlined in paragraphs A and B of the publication *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*), such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

Strong evidence of compliance with the recipient’s written-translation obligations under Safe Harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes five (5) percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected by encounter. Translation of other documents, if needed, can be provided orally. The failure to provide written translations under the circumstances does not mean there is non-compliance, but rather provides a guide for recipients that would like greater certainty of compliance that can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. This Safe Harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP persons through competent oral interpreters where oral language services are needed and reasonable.

The table below sets forth Safe Harbors for written translations.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents

5% or less of the eligible population or beneficiaries <i>and</i> less than 1,000 in number	No written translation is required
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**LANGUAGE ASSISTANCE
PROVIDING NOTICE TO LEP PERSONS**

Based on the program’s self-assessment, if the determination is that programs must provide language services, it is important to let LEP persons know that those services are available free of charge. The cost of providing language assistance will not be passed on to the customer and is generally minimal for HCD. The exception is when written materials need translation; the translation can be costly. This information should be provided by notice and in a language that an LEP person can understand. Some notification ideas include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (brochures, booklets, pamphlets, and flyers) that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance availability.
- Including notices in local newspapers in languages other than English.
- Providing notices on non-English language radio and television stations about the availability of language assistance services for important events.
- Presentations and/or notices at schools and religious organizations for important events or where community involvement is critical.
- Using a telephone voice mail menu (if available) in the most common languages encountered.
- Post language access taglines on program mailing inserts, FAQs, and on HCD webpages.

LANGUAGE ASSISTANCE MEASURES

Language assistance will be provided for LEP persons through the translation of some key materials, and oral language interpretation when necessary and possible, regardless if the five percent (5%) threshold was met for the specific non-English language. LEP persons are not obligated to provide their own interpreter, nor are they required to use a family member as an interpreter. It is important for legal or safety reasons to provide a qualified interpreter rather than use a family member or friend of the LEP person.

Each program will consider the appropriate balance of written translations and oral language assistance it will provide. In determining what language assistance the program will provide LEP persons to ensure their meaningful access to the program’s services, benefits, and activities, each program/office will consider:

- How important is the service, benefit, or activity that the program provides? For example, if a LEP person cannot access the service, benefit, or activity, will the person be deprived of critical services, such as the ability to exercise their legal rights or receive a financial benefit for which the individual is eligible? If so, the office will focus on improving access for LEP persons to this service, benefit, or activity.

- Even if the program does not provide a critical service, benefit, or activity, what impact will the denial or delay of the service, benefit, or activity have on actual and intended beneficiaries? The program/office will consider the long- and short-term impact on beneficiaries when determining what language assistance is appropriate.
- What are the points of contact where LEP persons interact with the program? What language assistance will program staff provide LEP persons for each point of contact?
- In instances where a contractor is secured to provide the direct service and/or benefit to the LEP person, the contractor may use their own language interpreter vendor or bilingual staff. They are not required to use HCD bilingual staff or resources; however, they must ensure the competency of interpreters and translation services.
- How can staff access the language assistance the program/office provides?

TRANSLATION AND INTERPRETATION PRINCIPLES

In addition to the four-factor analysis, HCD adopts the translation and interpretation assistance principles provided below that will guide each program area in developing its plan to improve access for LEP persons.

Translation is the rendering of a written text from one language (source language) into another language (target language). Interpretation is the immediate rendering of oral language from the source language into the target language.

Each program area will take reasonable steps to ensure that it provides high-quality translation and interpretation services through persons who are certified to provide those services at a level of fluency and comprehension appropriate to the specific nature, type, and purpose of the information at issue.

HCD employees in public contact positions that are bilingual designated have been tested on their oral fluency competency. However, they have not been tested on their written translation skills. As a result, program staff will not use bilingual certified staff for written translation purposes. HCD contracts with certified translator providers who meet written translation competencies set by CalHR to facilitate written translation needs.

QUALITY STANDARDS FOR TRANSLATED DOCUMENTS

As with oral interpreters, translators of written documents will be competent. Many of the same considerations apply. However, the skill of translating is very different from the skill of interpreting, and a person who is a competent interpreter may or may not be competent to translate, and vice versa. Particularly when vital documents are being translated, competence can often be achieved by use of certified translators.

Additionally, HCD has certified bilingual staff who have the ability to orally translate for LEP persons. These staff will not be used to translate written documents because they have not been tested on their written translation competency. To translate written documents, HCD's service contract for written translation services will be used.

VITAL DOCUMENTS

It is important to make an assessment as to the population percentage and the frequency and importance of the contact while considering the potential for translating

these documents. The program areas most likely to encounter the need to translate vital documents are public involvement, public information, and local assistance.

Examples of vital documents that require translation:

- Violation or deficiency notices.
- Notices of proposed public hearings.
- Notices of reduction, denial, or termination of services or benefits.
- Signs in reception areas and other points of initial entry.
- Notices advising LEP persons of free language assistance.
- Statements about the services available and the right to free language assistance services in brochures, booklets, outreach, and other materials routinely disseminated to the public.
- Applications or instructions on how to participate in a program or activity or to receive benefits or services.
- Consent forms.
- Rights and benefit information and/or forms.

Whether or not a document (or the information it solicits) is vital depends on the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not accurate or timely. Where appropriate, program managers will create a plan for consistently determining what documents are vital to the meaningful access of the LEP populations they serve, over time and across their various activities.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights and services is an integral part of “meaningful access”, as a lack of awareness may effectively deny an LEP person’s meaningful access. As part of their programs review, program managers engaged in community outreach efforts will regularly assess the needs of the populations they frequently interact with to determine which critical outreach materials will be translated. Community organizations are helpful in determining what outreach materials may be most helpful to translate, and some translations may be made more effective when done in tandem with outreach methods, including using ethnic media, schools, and religious and community organizations, to spread a message.

Sometimes a very large document may include both vital and non-vital information. This may also be the case when the title and a phone number for obtaining more information on the contents of the document in frequently encountered languages other than English is critical, but the document is sent out to the general public and cannot reasonably be translated into many languages. In a case like this, vital information may include, for instance, providing information in appropriate languages regarding where an LEP person might obtain an interpretation or translation of the document.

TRANSLATING WRITTEN DOCUMENTS

When a program identifies a need for document translation, the project coordinator will obtain a project translation quote from the vendor utilizing the “How to Obtain Written Translations” document posted on InsideHCD under the Diversity, Equity, and Inclusion Unit’s Language Assistance intranet page.

HOW TO ASSIST OUR LEP CUSTOMERS

With due consideration to the four-factor analysis, each program will decide when to provide interpretation assistance and how to provide that assistance in a timely and effective manner, appropriate to the circumstance. Each program will consider the following:

IN-PERSON LEP CUSTOMERS

Each program will consider a process for handling in-person services to LEP persons. Each program will take steps to ensure that it makes reasonable efforts to provide language assistance as needed for in-person contact with LEP persons. One way to determine the native language of unexpected visitors is to use the [language identification cards](#) (or “I Speak Cards”), which invite LEP person to identify their language needs to staff.

Once the language has been identified, HCD staff will use the “HCD Bilingual Staff Directory” located on the Language Assistance InsideHCD intranet page to identify employees in public contact positions to assist in that language. Employees that are identified as non-certified should be used in only very limited capacity.

The following is a consideration on how to assist a walk-in LEP customer:

1. Attempt to communicate in English first to determine if the customer can understand English sufficiently to be fully understood.
2. If the customer cannot understand or effectively communicate in English, determine the language they are speaking. If you recognize the language the customer is speaking but do not speak their language, skip to Step 4.
3. If you cannot recognize the language the customer is speaking, show them the “I Speak Cards” so the customer can point to their language.
4. Determine if any HCD employees listed on the HCD Bilingual Staff Directory speak the necessary language and are willing to interpret.
5. If not, utilize the “How to Obtain an Over the Phone Interpreter” steps found on the Language Assistance page located on InsideHCD.

SITE INSPECTIONS LEP CUSTOMERS

The following is a consideration on how to assist LEP customers:

1. If a site inspection is scheduled in a community where known LEP individuals, persons or customer reside, program staff will schedule an in-person interpreter in advance using the “How to Obtain an In Person Interpreter” steps found on the Language Assistance page located on InsideHCD.
2. Site inspectors will retain a copy of the language identification card ([I Speak Card](#)) during the planned inspections in the event they encounter a LEP person.
3. For immediate or unplanned interpreter needs, site inspectors will utilize the “How to Obtain an Over the Phone Interpreter” steps found on the Language Assistance page located on InsideHCD.

PHONE-IN LEP CUSTOMERS

Each program will take steps to respond in a timely and effective manner to LEP persons who call seeking assistance or information. Remember, LEP persons will be provided the same level of service as those who speak English. Each plan will include information regarding the process your program will use for handling those calls.

The following is a consideration on how to assist a phone-in LEP customer:

1. Attempt to communicate in English first. If it is not possible to effectively communicate in English, determine the language being spoken.
2. If staff cannot identify the spoken language, place the caller on hold (three-way call).
3. Utilize the “How to Obtain an Over the Phone Interpreter” steps located on the Language Assistance page located on InsideHCD.
4. The phone interpreter can assist HCD staff with identifying the spoken language and then transfer the three-way call to an available interpreter.

LANGUAGE ASSISTANCE RESOURCES

Bilingual Staffing

Employment of bilingual staff in divisions, programs, and regional offices is recommended, when feasible, where the percentage of LEP customers or potential customers is statistically significant, or where the frequency of contact with such persons will provide for efficient and effective communication. A decision to employ bilingual staff should be based on a needs assessment with due consideration given to budget constraints and in accordance with HCD policy. The Human Resources Branch can provide additional information on bilingual staff recruitment, bilingual pay procedures, and departmental positions requiring bilingual skills. The Language Access Coordinator under the Diversity, Equity, and Inclusion (DEI) Unit will assist with identifying where bilingual staff are located.

HCD Certified and Volunteer Bilingual Staff

HCD will use certified bilingual staff in designated bilingual positions as the primary resource for assisting LEP customers. When certified bilingual staff are unavailable, HCD may utilize non-certified bilingual staff. These non-certified bilingual staff serve as volunteers, with the permission of their managers, and may assist with interpretation services on a very limited basis. Every attempt should be made to use the interpreter services through the service vendor (telephone interpreter) prior to utilizing non-certified staff.

Language Identification Flashcards/I Speak Cards

To identify LEP individuals who need language assistance, the language identification card ([I Speak Card](#)) will be utilized when first encountering an LEP person. These cards were developed by the State Personnel Board (CalHR). They are used to identify the primary language of LEP persons during face-to-face contact. This card should be available at all public service counters and used during site inspections.

Qualified Interpreters

Qualified interpreter means an interpreter who is certified to interpret effectively, accurately, and impartially, either for persons with disabilities (American Sign

Language) or for LEP persons. The interpreter should be able to interpret both receptively and expressively, using any necessary specialized vocabulary. The California Department of Human Resources' (CalHR) Human Resources [Manual 1003 – Bilingual Services](#) prescribes the language proficiency testing standards.

Telephone Interpreters

HCD has established an Over the Phone Interpreter service with a service provider that is available 24 hours a day, 7 days a week, 365 days a year and provides access to over 200 languages. HCD staff may access the provider information by visiting the Language Assistance page located under the DEI Unit on InsideHCD.

Training

Training staff on the procedures of providing language assistance and how to determine whether and what type of language services a customer needs is essential to bridging the gap between policies or procedures and actual practices. Training will include how to obtain language assistance services and how to communicate needs to interpreters and translators. Providing language assistance in some program areas may also mean training staff to avoid using acronyms or industry jargon when communicating with LEP persons.

Language services will be provided at a time and place that avoids the effect of denying access to the service or benefit of the program. However, in some situations it may be reasonable to ask the LEP person to return at a specified date and time to allow time to arrange for interpreter services.

All supervisors and managers will be trained even if they do not interact regularly with LEP persons to ensure that they fully understand LEP requirements and to reinforce its importance and ensure implementation by staff.

Written Translation Services

Some program areas require interaction with the public as a part of daily operations and include contact with one or more LEP populations. If this interaction includes letters, notices, forms, or applications and the nature of these documents would be considered of critical importance to the LEP person, consideration will be given to written translation of the documents or forms. Translating documents for LEP customers to a fourth (4th) grade literacy level ensures the targeted audience understands the information. To ensure translation accuracy, staff will use the vendor service provider found on the Language Assistance Program page under the DEI Unit's InsideHCD intranet page.

External Interpreter/Translation Services

HCD has contracted services in order to translate and interpret both orally and in writing. Any written translation must be done by the vendor due to technicality reasons. Oral translation is able to be done by certified bilingual staff. Information about these services can be found on the DEI Unit's InsideHCD intranet page under the Organizational Development Division.

Persons with Disabilities

HCD provides assistance to persons with disabilities by maintaining a contract with an American Sign Language (ASL) service provider for in-person or virtual needs, as well as Braille, closed captioning, large font, and alternate formats. Contract information can

be found on the Language Assistance Program page under the DEI Unit's InsideHCD intranet page.

Other Useful Resources

The federal Interagency Working Group on LEP, pursuant to Executive Order 13166, and consisting of representatives from over 35 federal agencies, created www.lep.gov. The website includes links to Executive Order 13166 and the DOJ guidance documents. It also acts as a language [mapping tool](#) to help users find concentration of languages spoken by LEP persons in a community. The website is a clearinghouse, providing and linking to information, tools, and technical assistance and language services for federal agencies, recipients of federal funds, users of federal programs and federally assisted programs, and other stakeholders.

TECHNICAL ASSISTANCE

Diversity, Equity, and Inclusion Unit

HCD's DEI Unit is in charge of disseminating all LEP resources and information. This includes providing technical assistance, training, and developing program area procedures to ensure compliance.

DEFINITIONS

Bilingual

The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.

Demography

The study of the characteristics of human population, such as size, growth, and vital statistics.

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 persons may be required to have undergone a specialized training or certification process.

Limited English Proficient (LEP) Persons

Limited English Proficient (LEP) is a term used to refer to a person who is not fluent in the English language, often because it is not their native language, and have difficulty communicating effectively in English.

Primary Language

The language in which an individual is most effectively able to communicate.

Qualified Interpreter

Qualified interpreter means an interpreter who is certified as an interpreter and is able to interpret effectively, accurately, and impartially, either for persons with disabilities (American Sign Language Interpreter) or for persons with limited English skills. The interpreter should be able to interpret both receptively and expressively, using any necessary specialized vocabulary.

Substantial Number of Non-or Limited English Speaking People

Members of a group who either do not speak English, or who are unable to effectively communicate in English because it is not their native language, and who comprise five (5) percent or more of the people serviced by any local office or facility of a state agency.

Sufficient Number of Qualified Bilingual Employees

The number of qualified bilingual persons required to provide the same level of services to non-English speaking persons as is available to English speaking persons seeking such services.

Translation

The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.

Translating documents to fourth (4th) grade literacy level ensures the targeted audience understands the information.

Vital Documents

Documents that convey information that critically affects the ability of the recipient/customer to make decisions about their participation in the program. Examples of vital documents include, but are not limited to, applications, public notices, consent forms, letters containing important information regarding participation in a program, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, notices advising the availability of language assistance, and outreach and community education materials. It is recommended that divisions and programs develop criteria for deciding which documents are vital and thereby subject to translation.

MONITORING, CONTINUOUS ASSESSMENT, REPORTING, AND UPDATING THE LEP PLAN

Managers and supervisors are responsible for ensuring that meaningful services to LEP persons are provided in their respective divisions/programs. This plan must be incorporated by reference into the appropriate procedure manuals in order to ensure that employees are aware of their obligations for compliance.

The DEI Unit will monitor programs to ensure LEP requirements are fulfilled and report annually on the accomplishments related to LEP activities.

In monitoring compliance, an assessment will be made whether the program area's procedures allow LEP persons to overcome language barriers and participate in a meaningful way in the program activities and services. The program area's appropriate use of methods and options detailed in this LEP Plan will demonstrate their intent to comply with LEP requirements and Title VI of the Civil Rights Act of 1964.

LANGUAGE ACCESS COMPLAINTS

Individuals who feel they have been denied equal access to HCD's programs or services because of a language barrier have a right to file a complaint with HCD by emailing the Diversity, Equity, and Inclusion Unit at DEI@hcd.ca.gov. The Language Access Program Coordinator will track and work with program staff to resolve the complaint.

CONCLUSION

Providing meaningful access to LEP persons to HCD's programs, services, and activities is essential to achieving its mission "to create vibrant and inclusive communities." As we work together to ensure equal access, LEP persons will gain access to the many valuable HCD programs, services, and activities.

ADDENDUM

COMMUNICATIONS DIVISION

[FOUR FACTOR ANALYSIS](#)

DIVISION OF CODES AND STANDARDS

[FOUR FACTOR ANALYSIS](#)

DIVISION OF FEDERAL FINANCIAL ASSISTANCE

[FOUR FACTOR ANALYSIS](#)

DIVISION OF STATE FINANCIAL ASSISTANCE

[FOUR FACTOR ANALYSIS](#)

California Department of Housing and Community Development Communications Division Four-Factor Analysis

PURPOSE

The California Department of Housing and Community Development (HCD) adheres to all state and federal laws regarding language access, including but not limited to, the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, Americans with Disabilities Act Amendments Act of 2008, Executive Order 131166, California Civil Rights Act (Unruh Civil Rights Act), Dymally Alatorre Act, and Government Code section 11135. The purpose of this document is to identify to the staff and the public the Branches and Sections within the Communications Division that provide language access services, and the reasons for, and methods by which, these services are provided.

COMMUNICATIONS BACKGROUND

The communications and external affairs division primarily serves as a support system to other divisions providing services, including but not limited to:

- Media relations
- Website oversight
- External events
- Stakeholder and public engagement
- Design and editing social media management

COMPLIANCE WITH LIMITED ENGLISH PROFICIENT REQUIREMENTS

WHO MUST COMPLY?

Pursuant to Executive Order 13166, the meaningful access requirement of Title VI, the Title VI regulations, and the four-factor analysis set forth in the Department of Justice's (DOJ's) revised limited English proficient (LEP) Guidance, 67 FR 117 (June 18, 2002), apply to the programs and activities of federal agencies, including HCD. Federal financial assistance includes grants, cooperative agreements, training, and use of equipment, donations of surplus property, and other assistance. All programs and operations of entities that receive federal funds or assistance (recipients and sub-recipients) include:

- State agencies
- Local agencies
- Private and nonprofit entities
- All programs and operations of the federal government

All employees must ensure the public is treated with dignity and respect, identify the language needs for HCD's customers, and utilize available bilingual resources to assist customers, when needed.

DETERMINING THE NEED: FOUR-FACTOR ANALYSIS

1. The Communications Division participated in the 2020 Dymally-Alatorre language survey. During this survey period, they reported the following contact with limited English proficient customers:

Six employees participated in the ten-day survey cycle and counted ten public contacts during this time, of which were all English speakers. Therefore, the Communications Division did not meet the five percent threshold.

2. The Communications Division identified their communication vehicles. They identified their communication vehicles as follows:
 - i. Emails (E-blasts)
 1. Press releases
 - ii. Social Media – Twitter, Facebook, and LinkedIn
 - iii. Phone
 - iv. Website
 - v. Annual Report
3. Since the Communications Division did not meet a threshold language, vital documents were not identified.
 - i. N/A
4. The Communications Division identified their resources to provide language service to LEP individuals.
 - a. Language Assistance Services
 - i. Telephone interpretation
 - ii. Written translation
 - iii. American Sign Language (ASL)
 - iv. Accessibility reports, at the time of this report 99% of all HCD web pages were considered accessible.
 - v. Closed captioning on videos (both in-house and third party)
 - b. Evaluation and Monitoring
 - i. Communications
 1. Established grievance process – The Communications Division utilizes the current grievance process through the DEI Unit and external site instructions
 2. Monitor response to complaints – If receive any complaints, will refer to the DEI Unit
 3. Based on complaints, the Communications Division will identify trends to improve services
 4. Monitoring and updating four-factor analysis, including seeking input from beneficiaries receiving direct services
 - c. Collaboration
 - i. Reporters/Media providing them information about HCD.

- ii. Facilitating informational webinars for the public.
- iii. Collaborate with marketing/design consultants on communication materials (reports and designs).

A. COMMUNICATIONS LANGUAGE ASSISTANCE PLAN

As a result of the preceding Four-Factor Analysis, the Communications Division has developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons Communications serves, the process by which Communications will monitor and update the Language Access Plan (LAP).

Communications understands that the actions it is expected to take to meet its LEP obligations depend upon the results of the Four-Factor Analysis including the services the Communications Division offers, service area, available language assistance resources, and the costs of various language service options. However, the Communications Division will take reasonable steps to ensure meaningful access to LEP persons. The meaningful access is based upon a reasonableness standard that is both flexible and fact dependent.

1. The procedures the Communications Division will use to identify LEP persons with whom Communications has contact, the size of LEP populations, and the languages of LEP populations.

The Communications Division will continue to participate in the biennial survey to identify LEP individuals.

2. Points and types of contact the Communications Division may have with LEP persons.

The Communications Division receives points of contacts via telephone and emails inquiries related to general information, media contacts, and speaking engagement requests.

3. Ways in which language assistance will be provided by the Communications Division and the plan for outreach to LEP populations.

When requested by members of the public, language assistance services such as language and ASL interpreters, written translation, and alternate formats such as braille or large font, will be provided.

4. The Communications Division plan for training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring sub-recipients.

Current staff have attended training and new staff will be ushered into Language Access Responsibility training during their onboarding.

5. A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.

Since the Communications Division did not meet a five percent threshold during the last survey cycle, their publications are not automatically translated into other languages. However, if members of the public request interpreter or translation services, the Communications Division will use bilingual staff, the telephone interpreter, or vendor services to provide meaningful access to members of the public.

6. The Communications Division plan for translating informational materials that detail services and activities provided to Beneficiaries and for providing appropriately translated notices to LEP persons.

When members of the public request interpreter or translation services, the Communications Division will use bilingual staff, the telephone interpreter, or vendor services to provide meaningful access to members of the public.

7. The Communications Division plan for providing interpreters for large, medium, small and one-on-one meetings.

When the Communications Division facilitates public meetings, information will be provided on meeting agendas to provide notice that they have a right to request language access services free of charge. When requests are received, the Communications Division will use bilingual staff, the telephone interpreter, or vendor services to provide meaningful access to members of the public.

8. Communications' plan for developing community resources, partnerships, and other relationships to help with the provision of language services.

N/A

9. Communications' plan for monitoring and updating the LAP.

The biannual survey will be used to update the LAP.

COMPLAINTS

If you believe that you have been denied the benefits of this Language Assistance Plan, you may file a written complaint by emailing the Diversity, Equity and Inclusion Unit at DEI@hcd.ca.gov.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

Office of Fair Housing and Equal Opportunity
U. S. Department of Housing and Urban Development
400 State Avenue
Kansas City, Kansas 66101-2406

California Department of Housing and Community Development Division Codes and Standards Four-Factor Analysis

PURPOSE

The California Department of Housing and Community Development (HCD) adheres to all state and federal laws regarding language access, including but not limited to, the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, Americans with Disabilities Act Amendments Act of 2008, Executive Order 131166, California Civil Rights Act (Unruh Civil Rights Act), Dymally-Alatorre Act, and Government Code Section 11135.

CODES AND STANDARDS PROGRAM'S BACKGROUND

The Division of Codes and Standards' mission is to develop, administer, adopt, and enforce uniform statewide housing standards, to ensure the health and safety of Californians, to protect buyers from fraud and abuse, and safeguard the affordability of housing.

Registration and Titling

The Registration and Titling (R&T) Program provides registration and title documents for new or resold manufactured homes, commercial modulars, floating homes and truck campers. The program annually renews registrations for nearly 205,000 manufactured homes and commercial modulars in four district offices throughout the state, and provides assistance to dealers, escrow offices, manufacturers, local tax assessors, and the general public in obtaining title and registration documents, registration renewals, tax clearances, and title transfers.

Mobilehome Assistance Center

The Mobilehome Assistance Center (MAC) receives and processes complaints from the public and from public officials related to living in manufactured homes and mobilehomes. Staff provides information, coordination, referrals, and other assistance to help resolve complaints generally related to:

- the operation of mobilehome parks related to health and safety matters.
- the purchase, sale, financing, titling and registration of manufactured homes and mobilehomes.
- the installation, inspection, and maintenance or alteration of manufactured homes, mobilehome accessory structures, and park grounds.

Mobilehome Residency Law Protection Program

The Mobilehome Residency Law Protection Program (MRLPP) provides assistance in resolving and coordinating the resolution of complaints from homeowners relating to the Mobilehome Residency Law. Pursuant to Health and Safety Code Section 18802 subsection (f), the MRLPP shall select the most severe, deleterious, and materially and economically impactful alleged violations of the Mobilehome Residency Law to evaluate a complaint for potential referral to contracted nonprofit legal service

provider. The MRLPP also refers complainants to the appropriate enforcement agency or local community resources to assist in resolving the complaint allegations.

Mobilehome and Special Occupancy Parks

The Mobilehome and Special Occupancy Parks program develops, adopts, and enforces state regulations for the construction, use, maintenance, and occupancy of privately owned mobilehome and special occupancy parks throughout California, which assure owners, residents, and users protection from risks to their health, safety, and general welfare. The program issues permits-to-operate required to run mobilehome parks, special occupancy parks, and employee housing facilities

Employee Housing Program

The Employee Housing program oversees the construction, maintenance, use, and occupancy of privately-owned and -operated employee housing facilities providing housing for five or more employees to assure their health, safety, and general welfare. HCD enforces state laws and regulations related to the Employee Housing Act through [local enforcement agencies](#). Where local enforcement agencies do not enforce the provisions of the Act, HCD acts as the enforcement agency.

Southern Area Office (SAO)

SAO protects the health and safety of Californians by enforcing the Mobilehome Parks, Special Occupancy Parks, Employee Housing, and Manufactured Housing Acts. The SAO issues permits required to make alterations or conversions to mobilehomes, manufactured homes, commercial modulars, and special purpose commercial modulars; and for construction within mobilehome and special occupancy parks. The SAO offers additional services operating as California's southern area building and code enforcement department.

Northern Area Office (NAO)

NAO protects the health and safety of Californians by enforcing the Mobilehome Parks, Special Occupancy Parks, Employee Housing, and Manufactured Housing Acts. The NAO issues permits required to make alterations or conversions to mobilehomes, manufactured homes, commercial modulars, and special purpose commercial modulars; and for construction within mobilehome and special occupancy parks. The NAO offers additional services operating as California's northern area building and code enforcement department.

Occupational Licensing:

The occupational licensing requirements pertaining to the California Health and Safety Code and departmental regulations apply to all manufacturers, dealers, and salespersons who manufacture and sell (or lease) new or used manufactured homes, mobilehomes, or commercial modulars within California. HCD Occupational Licensing is solely responsible for these duties and carries them out statewide.

Manufactured Housing and Factory Built Housing Programs

The Manufactured Housing (MH) program administers the construction and alteration of commercial modulars, special purpose commercial modulars, and multifamily manufactured homes, monitoring design and construction through third-party agencies. Additionally, this program performs activities on behalf of HUD as a State Administrative Agency. . The Factory-Built Housing (FBH) program oversees the health and safety of housing components and systems manufactured to California building standards and certifies Third-Party Agencies to perform as a Design Approval Agency and/or a Quality Assurance Agency, enforcing design and construction approval of commercial modulars, special purpose commercial modulars, and multifamily manufactured homes designated for sale in California.

Administration and Operations

Recently formed to support Division of Codes and Standards programs and the public through flexible and reliable administrative and operational services. The program provides customer support through a dedicated contact center and payment services to Codes' customers through cashiering, resolving credit card disputes, and requester account services. The program manages and reviews documents that are received, processed, and/or distributed internally and externally to the public.

COMPLIANCE WITH LIMITED ENGLISH PROFICIENT REQUIREMENTS WHO MUST COMPLY?

Pursuant to Executive Order 13166, the meaningful access requirement of Title VI, the Title VI regulations, and the four-factor analysis set forth in the Department of Justice's (DOJ's) revised Limited English Proficient (LEP) Guidance, 67 FR 117 (June 18, 2002), apply to the programs and activities of federal agencies, including HCD. Federal financial assistance includes grants, cooperative agreements, training, and use of equipment, donations of surplus property, and other assistance. All programs and operations of entities that receive federal funds or assistance (recipients and sub-recipients) include:

- State agencies
- Local agencies
- Private and nonprofit entities
- All programs and operations of the federal government

All employees must ensure the public is treated with dignity and respect, identify the language needs for HCD's customers, and utilize available bilingual resources to assist customers, when needed.

DETERMINING THE NEED: FOUR-FACTOR ANALYSIS

1. The Codes and Standards Division participated in the 2020 Dymally-Alatorre language survey. During this survey period they had the following data:

- a. **Registration and Titling Program**

- i. The Registration and Titling Program (R&T) provides services in person through four public counters and via the telephone. During the two-week survey period of the 2020 Biennial Survey 1049 of 4651 (23 percent) of services were provided to Spanish speaking customers. Over the same time period, one customer requested services in Farsi.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protective Program

- i. The MAC and MRLPP and programs communicate with customers via telephone or written means. During the two-week survey period of the 2020 Biennial Survey 9 of 609 (.015 percent) public contact instances were Spanish. Data from the contact center software shows that between January 2021 and December 2021, 16 percent of total calls were offered in Spanish for both the MAC and MRLPP programs. Of 7,261 MAC complaints, 141 customers designated Spanish as their preferred language and 54 out of 1,654 MRLPP customers preferred language is Spanish.

c. Mobilehome and Special Occupancy Parks

- i. The Mobilehome, Special Occupancy, and Employee Housing Programs provided services to zero Spanish speaking customers based on the 2020 Biennial Survey results within a two-week period. The Mobilehome, Special Occupancy, and Employee Housing Programs provided services both in person at Codes and Standards Main Office (CSMO) public counters, email and by telephone.

d. Southern Area Office

- i. The regions that the SAO serves are from Inyo County to San Diego County includes thirteen counties.
- ii. The number or proportion of limited English proficient persons using a particular language that encounters SAO, is Spanish speakers at 26 percent.
- iii. Per SAO 2020 Biennial Survey, 2,332 calls and out of those calls were 610 Spanish calls.

e. Northern Area Office

- iv. The NAO covers the area from the California and Oregon border to Fresno County, encompassing 45 counties.
- v. The number/proportion of limited English proficient person using a particular language that comes in contact the NAO is 2.9 percent Spanish speakers per NAO's 2020 Biennial Survey (72 Spanish contacts out of 2,481 total contacts).

- vi. A current survey of field inspectors (DRs) via email has uncovered weekly contact with limited English proficient persons (LEP) using Vietnamese and Chinese.

f. Occupational Licensing

- vii. The people we serve are primarily English speaking, however on the OL complaints side of the unit, the program received calls from non-English speaking/English is not their primary language. (Most of these calls are from Spanish speaking persons).

g. Manufactured Housing/Factory Built Housing Program

- viii. Over the two-week survey period of the 2020 Biennial Survey 0 of the 281 MH/FBH customers served were LEP.

h. Admin/Operations

- ix. This is a newly created program/section; the contact center was previously under the R&T program and therefore and does not have any previous data separate from R&T program. It is expected to offer 23 percent services to Spanish speaking customers.

- 2. The Codes and Standards Division identified the communication vehicles as follows:

a. Registration and Titling

i. Phone:

1. Frequency

- a. The R&T program uses phone communication daily to assist customers with registration and titling transactions and applications. Currently, the program has nine Spanish certified bilingual staff members.

2. Importance:

- a. Telephone communication is of high importance. Not all customers have access to computers and due to the complexity of the applications telephone communication is often the most effective way to communicate with our constituents.

ii. In-Person:

1. Frequency:

- a. The R&T Program assists constituents daily at four public counters throughout the State; approximately 100 LEP are served on a weekly basis. If the customer is Spanish speaking, any available certified Spanish bilingual staff member will assist the customer at the counter, however, if translation

in a language other than Spanish is needed, employees utilize Interpreter's Unlimited to assist the customer. All offices maintain the Point to Your Language Poster – Identification Guide at public counter.

2. Importance:

- a. Customers might need assistance with forms in person. In-person communication makes it easier to fill out because they are able to have one on one interaction. Currently the online portal is not able to submit applications; the only way to submit applications is in person or by mail.

i. Written:

1. Frequency:

- a. Incoming correspondence from constituents via our Contact RT inbox and USPS. Inquiries are forwarded to verbal certified Spanish bilingual staff members to assist with translation and respond to the customer directly in a conversational manner or sent for translation.

2. Importance:

- a. Some people prefer to communicate via email. There is written communication between constituents and the program and they are able to keep better track of communications.

ii. Online portals:

1. Frequency:

- a. Occasionally, we receive Spanish comments/requests through the HCD Comment Form located on the website. Inquiries are then forwarded to a bilingual staff member to call back or compose a brief response.

2. Accessibility:

- a. Currently we do not have dedicated R&T online portal, it is in progress to launch in the near future.

iii. Outreach/Marketing:

1. Frequency:

- a. Outreach materials are translated using a contracted vendor to translate into Spanish or other languages that are needed.

2. Importance:

- a. Given that 23 percent of public contact is in languages other than English, outreach materials prompting or informing the public of the R&T

program are highly important. The contact center maintains a dedicate Spanish line.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

i. Phone:

1. Frequency:

- a. The MAC and MRLPP programs have daily public contact via telephone. One certified bilingual employee is available to assist Spanish speaking customers. In addition, staff utilize oral interpreter vendor services as needed.

2. Importance:

- a. The importance of phone contacts is high as employees use the telephone to gather additional information from complainants. Failure to provide timely services can cause a delay in coordinating resolution of health and safety matters within a park, MRL complaint processing, providing appropriate community resources to the public.

ii. Written:

1. Frequency:

- a. Weekly commutation of written translations services is used for translating forms, letters, and other materials. For emails, staff will translate and call and discuss. If no phone number is available or referring to another Codes program, staff will provide a brief response in Spanish. Staff will translate and complete data entry for any mail/fax in Spanish. Need to be able to respond to emails, etc. in writing in Spanish. Will use translations services for other languages.

2. Importance:

- a. The importance of written contacts is high.

iii. Online portals

1. Frequency:

- a. Communication via online portals is daily. Customers may submit a complaint via the portal.

2. Importance:

- a. The complaint portal is the most used means to submit a complaint.

3. Accessibility

- a. The portal meets accessibility requirements and uses Google Translate to translate into languages other than English.

- iv. In-Person:
 - 1. Frequency:
 - a. Occasionally once counters open. On-site bilingual staff can assist in person (primarily Spanish). If no bilingual staff are available, then staff utilize the telephone interpreter vendor services.
 - 2. Importance:
 - a. The importance of contact in-person is low, as most services rarely occur in-person.
- v. Outreach/Marketing
 - 1. Frequency:
 - a. Translations services is used for translations for outreach materials. The primary MAC poster to be displayed in all mobilehome parks is available in both English and Spanish. Other outreach materials are translated as needed.
 - 2. Importance:
 - a. The importance of contact via outreach/marketing is medium, as outreach materials are not the primary means of reaching MAC/MRLPP customers.

c. Mobilehome and Special Occupancy Parks

- i. Phone
 - 1. Frequency
 - a. Less than 10 calls per year. Bilingual staff from neighboring programs assist when needed. Interpreter’s Unlimited vendor has not been used within the past two years.
 - 2. Importance:
 - a. With limited frequency, the importance within the program is low.
- ii. In-Person:
 - 1. Frequency:
 - a. No interpreter needed to assist constituents that use our public counter.
 - 2. Importance:
 - a. With limited frequency, the importance within the program is low.
- ii. Written:
 - 1. Frequency:
 - a. The Program provides Spanish forms for Mobilehome and Special Occupancy Parks Program/Employee Housing Programs online, and in person. No forms were requested through programs during 2020 Biennial Survey.
 - 2. Importance:

- a. Contact via written documentation is very important as Program customers need clear and accurate guidance on how to complete transactions and maintain legal operation status with the Division.
 - iii. Online Portals:
 - 1. Frequency:
 - a. Mobilehome and Special Occupancy Parks Program/Employee Housing Program have not received requests through Web Comments in languages other than English.
 - 2. Importance:
 - a. With limited frequency, the importance within the program is low.
 - iv. Accessibility:
 - 1. Currently we do not have a dedicated Mobilehome and Special Occupancy Parks Program/Employee Housing Program online portal.
 - v. Outreach/Marketing:
 - 1. Frequency:
 - a. The program uses vendors to translate flyers, letters, or any other documents into Spanish or other languages that are needed.
 - 2. Importance:
 - a. With limited frequency, the importance within the program is low.

d. Employee Housing Program

- i. Phone:
 - 1. Frequency:
 - a. Less than 10 calls per year. An interpreter from neighboring programs assists when needed. Interpreter's Unlimited vendor has not been used within the past two years.
 - 2. Importance
 - a. With limited frequency, the importance within the program is low.
- ii. In-Person:
 - 1. Frequency
 - a. No interpreter needed to assist constituents that use our public counter.
 - 2. Importance
 - a. With limited frequency, the importance within the program is low.
- iii. Written:
 - 1. Frequency

- a. HCD provides Spanish forms for Mobilehome and Special Occupancy Parks Program/Employee Housing Program Programs online and in person. No translated forms were requested through programs during last Biennial Survey.
 - 2. Importance
 - a. With limited frequency, the importance within the program is low.
 - iv. Online Portals:
 - 1. Frequency:
 - a. Employee Housing Program has not received requests through Web Comments in languages other than English.
 - 2. Accessibility:
 - a. Currently, we do not have dedicated Employee Housing Program online portal
 - 3. Importance:
 - a. With limited frequency, the importance within the program is low.
 - v. Outreach/Marketing:
 - 1. Frequency:
 - a. Whenever Program needs to create outreach materials, the Program uses vendors to translate flyers, letters, or any other documents into Spanish or other languages that are needed.
 - 2. Importance:
 - a. With limited frequency, the importance within the program is low
- e. Southern Area Office/Northern Area Office**
 - i. Phone:
 - 1. Frequency:
 - a. The frequency of contacts via telephone is high.
 - b. Utilize interpreter services for languages other than Spanish. If caller is Spanish, then utilize bilingual staff.
 - 2. Importance:
 - a. The importance of contacts via telephone is high; if a caller is not fully informed on health and safety violation(s), as an example, in their preferred language, there may be misinterpretation, confusion, or further risk to their health and safety.
 - ii. In-Person:
 - 1. Frequency:
 - a. The frequency of communication in person is high.
 - b. If interaction occurs at an office front counter than a bilingual (Spanish) speakers interprets. If none are

available, then the employee utilizes the interpretation services.

- c. During inspections they have a language identification card. If no interpreter available, the employee utilizes the telephone interpretation services.

2. Importance:

- a. The importance of communication in person is high; if a in-person customer is not fully informed on health and safety violation(s), as an example, in their preferred language, there may be misinterpretation, confusion, or further risk to their health and safety.

iii. Written

1. Frequency:

- a. The frequency in written communication is moderate.
- b. Customers are directed to the interpreter services since bilingual staff are not certified to provide written translation.

2. Importance:

- a. The importance of written communication is high; if a written communication is not fully understood regarding health and safety violation(s), as an example, in the recipients preferred language, there may be misinterpretation, confusion, or further risk to their health and safety.

iv. Online portals

1. Frequency:

- a. The frequency of communication via online portals is low and the Program does not have an online portal for direct communication.

2. Importance:

- a. With limited frequency, the importance within the program is low.

f. Occupational Licensing

i. Phone:

1. Importance:

- a. The importance of telephone communication is high as our customer require clarification about laws, regulations, or health and safety concerns.

2. Frequency:

- a. Weekly communications via telephone.

ii. In-Person:

1. Importance:

- a. The importance of telephone communication is low with infrequent in-person customer interactions

- require clarification about laws, regulations, or health and safety concerns.
 - 2. Frequency:
 - a. In-person interactions are low.
 - iii. Written:
 - 1. Importance:
 - a. The importance of written communication is high as our customer require clarification about laws, regulations, or health and safety concerns.
 - 2. Frequency:
 - a. Written commutations are low.
 - iv. Online Portals:
 - 1. Importance:
 - a. The importance of online portal communication is low as the program does not have an online portal for communication.
 - 2. Frequency:
 - a. Communication is nonexistent.
 - 3. Accessibility:
 - a. Internal Codes and Standards employee conducts accessibility of the online portal.
 - v. Outreach/Marketing
 - 1. N/A

g. Manufactured Housing/Factory Built Housing Program

- i. Phone:
 - 1. Importance:
 - a. Public contact with LEP is limited, therefore the importance of phone interactions is medium.
 - 2. Frequency
 - a. The MH/FBH programs is staffed with four staff persons. When the program receives calls from LEP customers and the language can be identified will be asked to translate. If the language cannot be identified the contracted vendor is used to assist.
- ii. In-Person:
 - 1. Importance:
 - a. With limited frequency, the importance within the program is low.
 - 2. Frequency:
 - a. Frequency is less than a handful in a year.
- iii. Written:
 - 1. Importance:
 - a. Most written communication is with manufactures or local governments; rarely written communication

with LEP is therefore the importance of written communication is of a medium level.

2. Frequency
 - a. The MH/FBH programs have the two most commonly used forms translated into Spanish, HCD 416 Application for Replacement Insignia, and HCD 425 Placement of Insignia form.
 - b. All of form letters include an ending paragraph, in Spanish, that directs the recipient to contact the contact center for an interpreter if needed.
 - c. All other written correspondence is conducted in English.
3. Accessibility
 - a. The most commonly used forms (HCD 416 and HCD 425) are ADA complaint and available in both in English and Spanish.
- iv. Outreach/Marketing
 1. This program has limited outreach materials to the public.
 - a. Importance
 - i. This program has limited outreach materials to the public. Due to lack of frequency of outreach/marketing in languages other than English the importance is low.
 2. Frequency
 - a. Due to the limited frequency of public contact with LEP, outreach/marketing in languages other than English is low.

h. Admin/Operations

- i. Phone: The Admin/Operations program maintains a contact center specifically dedicated to answering calls every day from the public, which includes two Spanish bilingual staff members.
 1. Importance
 - a. Communication via telephone is of high importance as it is the initial contact with Codes and Standards for many customers.
 2. Frequency:
 - a. The Admin/Operation Section uses phone communication daily with our constituents. Currently, the program has a Contact Center specifically dedicated to answering calls every day from the public, which includes two Spanish bilingual staff members and a dedicated Spanish line.
- ii. In-Person:
 1. No work is done in-person.
- iii. Written:

1. Importance:
 - a. Communication through written documentation is of high importance. Customers receive information or status updates about regarding applications.
 2. Frequency:
 - a. We receive incoming applications and correspondence from constituents via USPS (postal service) daily.
 - iv. Online portals:
 1. N/A
 - v. Outreach/Marketing:
 1. Outreach materials are created using a vendor specified by management to translate flyers, letters, or any other documents into Spanish or other languages that are needed.
 2. Importance:
 - a. Communication through outreach and marketing is of a medium level of importance and most often needed when a new program or changes to programs are being made.
 3. Frequency:
 - a. On a quarterly basis.
3. The Codes and Standards Division identified all vital documents that need to be, or already are, translated into Spanish.

a. Registration and Titling

i. Applications

1. [HCD 416](#) (PDF) — Application for Replacement Insignia
2. [HCD RT 475.1](#) (PDF) — Bill of Sale
3. [HCD RT 475.2](#) (PDF) — Certificate for Transfer Without Probate
4. [HCD RT 475.3](#) (PDF) — Lien Satisfied
5. [HCD 475.4](#) (PDF) — Power of Attorney
6. [HCD RT 476.4](#) (PDF) — Certification of Retail Value and Purchase Price
7. [HCD RT 476.6](#) (PDF) — Statement of Facts
8. [HCD RT 476.6G](#) (PDF) — Multi-Purpose Transfer Form
9. [HCD RT 476.6I](#) (PDF) — Statement of Facts – Bond
10. [HCD RT 476.9](#) (PDF) — Change of Mailing Address for a Registered Owner, Legal Owner or Junior Lienholder
11. [HCD RT 480.0](#) (PDF) — Bond or Undertaking Requirements for Manufactured Homes/Mobile homes, Commercial Modulares, Truck Campers, and Floating Homes

12. [HCD RT 480.4](#) (PDF) — Application for Duplicate Certificate of Title
 13. [HCD RT 480.5](#) (PDF) — Application for Registration (New Title Information Only)
 14. [HCD RT 481.2](#) (PDF) — Application for Duplicate Registration Card
 15. [HCD 484.7](#) (PDF) — Statement to Encumber
 16. [HCD RT 486.1](#) (PDF) — HUD Label Location
 17. [HCD 486.4](#) (PDF) — Statement of Facts Salvage Units
 18. [HCD 488.4](#) (PDF) — Transfer on Death Beneficiary
 19. [HCD 490.9](#) (PDF) — Application for Substitute Decal
 20. [HCD RT 480.9](#) (PDF) — Notice of Situs Change for Manufactured Home, Mobile home, Multifamily Manufactured Home, or Floating Home
 21. [HCD RT 475.6](#) (PDF) — Statement of Error or Erasure
 22. [HCD RT 476.8](#) (PDF) — Notice of Sale or Transfer
- i. Notices of Rights/Benefits
 1. Manufactured Home Registration Renewal Billing Notice.
 2. New R&T Deficiency Letter, Response Due.
 3. Buy, Sell, or Transfer a Mobile home/Manufactured Home Instructions.
 - ii. FAQs
 1. Business Customer Section FAQ and Guidebook (in the process of being approved for distribution to our customers).
 - iii. Accessibility
 1. R&T forms and instructional letters are located on our HCD website are ADA complaint. Program will mail forms upon request.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. The Mobilehome Assistance Center/Mobilehome Residency Law Protection Program vital forms in need of translation
 1. Complaint Forms MP – Available in English and Spanish (pdf). English only online form/portal. Google translate is available of online complaint form. ADA compliant
 1. Mobile home residency law protection program – Available in English and Spanish (pdf). English only online form/portal. Google translate is available of online complaint form. ADA compliant
 2. EH – Available in English and Spanish (pdf). English only online form/portal. Google translate is available of online complaint form. ADA compliant

3. SAA – no complaint form (pdf). English only online form/portal. Google translate is available of online complaint form. ADA compliant
4. FBH – no complaint form (pdf). English only online form/portal. Google translate is available of online complaint form. ADA compliant
5. Good Faith Resolution Inquiry Form – English only. Needs to be translated to Spanish. ADA compliant (Spanish version is currently being routed)
6. Standard Letters/Correspondence – English only. Needs to be translated to Spanish. Some letter/email templates are ADA compliant (Will need to evaluate/some letters templates have been translated).
7. FAQs -English and Spanish versions available (pdf)
8. Mobile home assistance center poster - English and Spanish versions available (pdf)
9. Outreach material – as needed

c. Occupational Licensing

- i. The Occupational Licensing Unit did not meet the threshold for Spanish, so no documents need to be translated.
 1. (Complaints) covered with MAC/MRLPP, provide various language complaint forms (on-line and hardcopy/printable complaint forms with instructions.) Pamphlets or information sheets in different languages that can be mailed, e-mailed, or texted may be beneficial and should refrain from using acronyms in these types of documents.
 2. For Occupational Licensing complaints in Spanish, we utilize the Spanish language complaint form available from the website.

d. Mobilehome and Special Occupancy Parks Program

- i. The Mobilehome and Special Occupancy Parks Program did not meet the threshold for Spanish, so no documents need to be translated.
 1. EPP Guidebook for MHP, Part 2

e. Employee Housing

- i. The Employee Housing Unit did not meet the threshold for Spanish, so no documents need to be translated.
 - 1.HCD EH 200 – Employee Housing: Safe and Sanitary
 - 2.HCD EH 200 SP – Employee Housing: Safe and Sanitary (Spanish)
 - 3.HCD EH 206 – Employee Housing Act Poster

f. Southern Area Office/Northern Area Office

- i. Applications
 1. HCD 415 Manufactured Housing Permit Application
 2. HCD 50-Permit to Construct
 3. HCD 538 Lot Plot Plan
 4. HCD 50 ERBS- Earthquake Resistant Bracing System Application
 5. HCD MH 604 Manufactured Home Alterations and Permit Guide
 6. HCD MH 527- Manufactured Home Electrical Load Worksheet
 7. Lot Marker Handout
 8. HCD MP 511 Alternate Approval Application
 9. HCD MP 520- Standard Plan Approval Application
 10. HCD 433A Notice of MH, CM Installation on a Foundation System
 11. HCD MP 514 Park Construction Approval Booklet
- ii. Notices of rights/benefits
 1. The Mobilehome Park Maintenance (MPM) Residence booklet is translated into Spanish and is handed out to park residents when prior to the MPM inspection.
- iii. Termination letters
 2. Offices do not have termination letters but do send denial letters to customer regarding their permit applications. These are in English.
- iv. FAQs
 3. Office's email inbox has an automatic reply that has FAQ that can be translated into Spanish
- v. Accessibility
 4. Office has several forms in Spanish available on the HCD website.

g. Manufactured Housing/Factory Built Housing Program

- i. The Manufactured Housing/Factory Built Housing Program has the following vital documents:
 1. HCD MH 416 (PDF) - Application for Replacement Insignia; available in English and Spanish
 2. All English letters have a sentence between the body and signature written in Spanish and directing customers to the contact center for translation.

h. Admin/Operations

- i. The Admin/Operations Unit has no vital documents.

4. The Codes and Standards Division identified resources to provide language services to LEP individuals.

a. Registration and Titling Program

- i. Verbal interpretation
 - 1. Bilingual staff: Registration and Titling has nine Spanish bilingual certified staff members.
 - 2. Vendor services: Interpreter's Unlimited
- ii. Written translation: Certified bilingual staff to translate written conversational materials in Spanish. The contracted vendor, Interpreter's Unlimited, is used to translate other written materials into Spanish.
- iii. Outreach effectively to the LEP community
 - 1. Interpreters: During outreach events at least one bilingual staff member to assist our LEP Spanish customers.
 - 2. ASL: The department does have Interpreter's Unlimited for ASL services.
- iv. Notices/Taglines
 - 1. A list of languages that customers can point to identify their language is placed at every public counter. Additionally, on R&T deficiency letters we offer bilingual services by calling the contact center. We are currently updating our processes to direct our customers to our bilingual services.
- v. Training
 - 1. Steps taken to ensure new hires are trained in language access services: R&T makes new hires aware of the services we offer to our LEP customers and provides refresher training as needed.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. Verbal interpretation
 - 1. Bilingual staff - Spanish
 - 2. Vendor services
- ii. Written translation
 - 1. Vendor services
- iii. Outreach effectively to the LEP community
 - 1. Interpreters
 - 2. ASL
- iv. Notices/Taglines
 - 1. How do you notify program beneficiaries of their right to language services? MRLPP has verbiage on the complaint form.
 - a. Call tree provides an option for Spanish
 - b. Online complaint form has a drop down for language preference/Language preference on complaint form.

- c. HCD website has google translate.
- d. Engages translations services when calls are received.

c. Mobilehome and Special Occupancy Parks Program

- i. Verbal interpretation
- ii. Bilingual staff: Nine Spanish bilingual certified staff members in nearby program.
- iii. Vendor services: Interpreter's Unlimited
- iv. Written translation:
 - 1. Vendor services: Interpreter's Unlimited.
- v. Outreach effectively to the LEP community
 - 2. Interpreters: Interpreter's Unlimited.
 - 3. ASL: Interpreter's Unlimited.
- vi. Notices/Taglines
 - 4. How do you notify program beneficiaries of their right to language services? We have a list of languages that our customers can point to identify their language. When a customer calls the contact center, they have an option of a dedicated Spanish line.
- vii. Training
 - 5. The program makes new hires aware of the services we offer to our LEP customers and provides refresher training as needed. We make sure to provide employees with the tools and resources they need to be able to reach an interpreter via phone if they need to.

d. Employee Housing Program

- i. Verbal interpretation
- ii. Bilingual staff: Nine Spanish bilingual certified staff members in nearby program.
- iii. Vendor services: Interpreter's Unlimited
- iv. Written translation:
 - 1. Vendor services: Interpreter's Unlimited.
- v. Outreach effectively to the LEP community
 - 2. Interpreters: Interpreter's Unlimited.
 - 3. ASL: Interpreter's Unlimited.
- vi. Notices/Taglines
 - 4. How do you notify program beneficiaries of their right to language services? We have a list of languages that our customers can point to identify their language. When a customer calls our 1-800 number, we have an option for Spanish by pressing 9.
- vii. Training
 - 5. The Program makes new hires aware of the services we offer to our LEP customers. We make sure to provide

employees with the tools and resources they need to be able to reach an interpreter via phone if they need to.

e. Southern Area Office/Northern Area Office

- i. Verbal interpretation
 1. Bilingual staff- Offices have four certified Spanish speaking office staff and seven certified Spanish speaking field staff that are utilized when a customer requests a translator.
 2. Vendor services- Office staff utilize Interpreters Unlimited (HCD provided service) when a customer via phone/in person requests a translator or when a bilingual staff member is not available.
- ii. Written translation
 3. Vendor services-
 - a. Interpreters Unlimited is utilized to translate some of our commonly used forms into Spanish.
 - b. The Codes and Standards Automated System (CASAS) and the HCD website has an option to change the language.
 - c. There is a video on HCD's website for Spanish speaking customers to view regarding our MPM program inspection process.
 - d. There are several forms on HCD's website in Spanish/Vietnamese:
 - i. [HCD-MH 425- Insignia Affix Instructions\(in Spanish\)](#)
 - ii. [Nueva Escalera Autoportante para el Exterior](#) (New Exterior Self-Supporting Stairway)
 - iii. [Mobilehome Park Maintenance Booklet \(in Vietnamese\)](#)
 - iv. [County Community Resources \(In Spanish\)](#)
- iii. Outreach effectively to the LEP community
- iv. Interpreters-
 1. Offices have seven field inspector that is bilingual in Spanish and certified. They are utilized, when possible, for translations with the public while in the field.
 2. Office-generated letters are provided in both English and Spanish and have instructions in Spanish and Vietnamese to contact 1-800-952-8356 to speak to a bilingual staff member.
- v. ASL
 1. Offices have not used ASL in the community, however the MPM video does have closed captions. There are services

provided by the HCD via Interpreters Unlimited/
Translating Services, Inc. that Offices can utilize if ASL
services are requested.

2. When presenting information to the public (for instance at the bi-annual MPM Force Task meetings), an ASL translator can be physically present or be present on the screen if for remote viewing.

- vi. Notices/Taglines
- vii. How do you notify program beneficiaries of their right to language services?
 1. Offices have "I Speak" cards posted in the public lobby with various languages that the LEP can use to let staff know what language is needed for translation services.
 2. Official letters from Offices have a paragraph explaining how LEP can obtain translation services by contacting 1-800-952-8356 to speak to a bilingual staff member.

f. Occupational Licensing

- i. Assistance from Bi-lingual staff in Registration & Titling (when available) is primarily outcome for Spanish speaking callers. We also utilize HCD's Language Access Vendors for other languages.

g. Manufactured Housing/Factory Built Housing Program

- ii. All English letters include a sentence between the body and the signature, written in Spanish, and directing customers to the RT 1-800 phone number for translations.

h. Admin/Operations

- iii. Verbal interpretation
- iv. Bilingual staff: Admin/Operations has two Spanish bilingual certified staff members.
- v. Vendor services: Interpreter's Unlimited
- vi. Written translation: For Spanish Translations we were using the certified bilingual staff to translate written materials. We will now be using Interpreter's Unlimited to translate written materials into Spanish.

5. The Codes and Standards Division provides the following training to all employees in the ways of language services:

a. Registration and Titling

- a. We will implement language access services training as part of the initial on boarding process.

- b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program**
 - a. Staff are trained on how to use translations services during onboarding.
 - b. Bilingual staff are certified.
 - c. Refresher training is offered as needed.
 - d. I speak cards (for in person) - Not currently staffing counter/not in use

- c. Mobilehome and Special Occupancy Parks Program**
 - a. Staff are trained on how to use translations services during onboarding.
 - b. Bilingual staff are certified.
 - c. Refresher training is offered as needed.
 - d. I speak cards (for in person)

- d. Employee Housing Program**
 - a. Staff are trained on how to use translations services during onboarding.
 - b. Bilingual staff are certified.
 - c. Refresher training is offered as needed.
 - d. I speak cards (for in person)

- e. Southern Area Office/Northern Area Office**
 - i. New hires are provided:
 - a. The Language Assistance Handbook that provides an overview of HCD's Language Access Policy.
 - b. Business cards with the name and phone number of the company providing interpreting services for HCD.
 - c. List of names and phone numbers of Bilingual HCD employees.
 - d. A walkthrough of how to call the interpreter for services along with the instructions on how to notify the Diversity, Equity, and Inclusion (DEI) Unit regarding the use of the service.
 - e. Written instructions for using HCD's interpreter services through the office phones or the assigned work iPhone and the use of the I-speak card.

- f. Occupational Licensing**
 - a. Staff are trained on how to use translations services during onboarding.
 - b. Bilingual staff are certified.
 - c. Refresher training is offered as needed.
 - d. I speak cards (for in person)

- a. Established grievance process
 - 1. If there was a grievance or complaint staff has been instructed to forward the customer to their supervisor or manager via phone, email, voicemail, or at public counter
 - 2. Grievances will be handled and reported to the Diversity, Equity, and Inclusion Unit if services are needed
- b. Monitor response to complaints
 - 1. Offices have not had a complaint regarding LEP services. Program continues to assist public/customer with LEP services when needed. Program monitors calls, voicemails, and emails for any grievances regarding LEP services within the Program.

f. Occupational Licensing

- a. Established grievance process
 - 1. If there was a grievance or complaint staff has been instructed to forward the customer to their supervisor or manager via phone, email, voicemail, or at public counter
 - 2. Grievances will be handled and reported to the Diversity, Equity, and Inclusion Unit if services are needed
- b. Monitor response to complaints
 - 1. Offices have not had a complaint regarding LEP services. Program continues to assist public/customer with LEP services when needed. Program monitors calls, voicemails, and emails for any grievances regarding LEP services within the Program.

g. Manufactured Housing/Factory Built Housing Program

- a. The manufactured housing/factory built housing program will use the DEI inbox (DEI@hcd.ca.gov) to pursue any grievance processes.

h. Admin/Operations

- a. Established grievance process: DEI@hcd.ca.gov
- b. Monitor response to complaints: Contact Center Supervisor/Managers will monitor complaints submitted.
- c. Identify trends to improve services: Contact Center Supervisor/Managers will identify trends.

- 7. The Codes and Standards Division collaborates with the public for compliance in the following ways:

a. Registration and Titling

- a. The Registration and Titling Program will have Mobile office events, outreach programs, bilingual staff, and forms available in Spanish.

- b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program**
 - a. Added additional language preferences to online complaint form (drop down menu). Updating complaint forms for complainants to enter language preferences.
- c. Mobilehome and Special Occupancy Parks Program**
 - a. Added additional language preferences to online complaint form (drop down menu). Updating complaint forms for complainants to enter language preferences.
- d. Employee Housing Program**
 - a. Added additional language preferences to online complaint form (drop down menu). Updating complaint forms for complainants to enter language preferences.
- e. Southern Area Office/Northern Area Office**
 - a. With the completion of the Four-Factor analysis, it will help the department define what is needed to help with LEP services within our department.
- f. Occupational Licensing**
 - a. Utilize complaint forms (Spanish)
- g. Manufactured Housing/Factory Built Housing Program**
 - a. Aside from interpreter assistance by other staff technicians in our Division, and the vendor resources spelled out in HCD policy, we have not taken any steps in this direction.
- h. Admin/Operations**
 - a. Verbal interpretation
 - i. Bilingual staff
 - ii. Vendor services
 - b. Written translation
 - i. Vendor services

CODES AND STANDARDS LANGUAGE ASSISTANCE PLAN

As a result of the preceding Four-Factor Analysis, Codes and Standards has developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons Codes and Standards serves, the process by which Codes and Standards will monitor and update the LAP.

Codes and Standards is expected to to meet its LEP obligations depend upon the results of the Four-Factor Analysis including the services offered, service areas, the

resources availability, and the costs of various language service options. However, Codes and Standards must take reasonable steps to ensure meaningful access for LEP persons. The meaningful access is based upon a reasonableness standard that is both flexible and fact dependent.

1. The procedures Codes and Standards will use to identify LEP persons with whom Codes and Standards has contact, the size of LEP populations, and the languages of LEP populations.

a. Registration and Titling

- i. The R&T Program will use the 2020 Biennial Survey and implement a new tracking system for our main office to be able to track our interactions with LEP individuals.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. MAC and MRLPP will utilize the 2020 Biennial survey, call center and complaint language preference data determine the size and languages of LEP populations.

c. Mobilehome and Special Occupancy Parks Program

- i. The Mobilehome and Special Occupancy Parks Programs will use the 2020 Biennial Survey along with 2020 U.S. Census data and the continuous surveying of office to identify LEP persons contacted, the size of LEP populations, and the languages of LEP populations.

d. Employee Housing Program

- i. The Employee Housing Program will use the 2020 Biennial Survey along with 2020 U.S. Census data and the continuous surveying of public contact staff to identify LEP persons contacted, the size of LEP populations, and the languages of LEP populations.

e. Southern Area Office/Northern Area Office

- i. The Offices will continue to use the 2020 Biennial Survey along with any other data and surveys provided to identify LEP population within are area.

f. Occupational Licensing

- i. The Occupational Licensing Program will use the 2020 Biennial Survey along with 2020 U.S. Census data and the continuous surveying of office to identify LEP persons contacted, the size of LEP populations, and the languages of LEP populations.

g. Manufactured Housing/Factory Built Housing Program

- i. The MH/FBH program will use the 2020 Biennial Survey along with 2020 U.S. Census data and the continuous surveying of public contact staff to identify LEP persons with whom the MH/FBH programs has contact, the size of LEP populations, and the languages of LEP populations.

h. Admin/Operations

- i. The Admin/Operation Program will use the Biennial Survey and the newly implemented Amazon Connect contact center system for our main office to be able to track our interactions with LEP individuals.

2. Points and types of contact Codes and Standards may have with LEP persons.

a. Registration and Titling

- i. The R&T Program assists LEP individuals at our public counters, via our contact center, via our specialized inboxes, and we also receive correspondence via postal service.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. MAC and MRLPP provides services to the general public in person, on the phone, written correspondence, and via an online portal.

c. Mobilehome and Special Occupancy Parks Program

- i. Mobilehome and Special Occupancy Parks Program encounter LEP via the public counter, phone calls, voicemails, emails or via written letters. These contacts are related to the Mobilehome Program permit-to-operate application process, needing explanations of notices they have received regarding the permit renewal or application process.

d. Employee Housing Program

- i. Employee Housing Program encounters LEP via the public counter, phone calls, facility inspections, voicemails, emails or via written letters. These contacts are related to the Employee Housing Program permit application process, needing explanations of notices they have received regarding facility inspections or permits.

e. Southern Area Office/Northern Area Office

- i. Southern Area Office and in the field, staff encounter LEP customers via public counter, phone, voicemail, emails, and written correspondence. These contacts are on a daily basis and are related to our departments permit process and programs within our department.

f. Occupational Licensing

- i. Compile data/feedback from field employees to determine if they have needs for language assistance.
 - g. Manufactured Housing/Factory Built Housing Program**
 - i. The MH/FBH housing program encounters LEP via the Registration & Titling public counter, phone calls, voicemails, emails, and written letters. These contacts are related to the replacement insignia process.
 - h. Admin/Operations**
 - i. The Admin/Operation Section assists LEP individuals via our contact center, via our specialized inboxes, and we also receive correspondence via postal service.
- 3. Ways in which language assistance will be provided by Codes and Standards, and the plan for outreach to the LEP populations.**
 - a. Registration and Titling**
 - i. We provide language assistance through our nine Spanish certified bilingual staff members, and we also provide translations services through our department interpreting services vendor and translation services.
 - b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program**
 - i. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program will provide language assistance through certified bilingual staff or through the Department's translation services vendor. The public can also identify language preference for complaints submitted via the online complaint form.
 - c. Mobilehome and Special Occupancy Parks Program**
 - i. The Mobilehome and Special Occupancy Parks Programs provide language assistance services through use of the HCD provide interpreter services or through utilizing the 9 Bilingual (Spanish) staff in the nearby Registration and Titling Program.
 - d. Employee Housing Program**
 - i. The Employee Housing provides language assistance services through use of the HCD provide interpreter services or through utilizing the nine Bilingual (Spanish) staff in the nearby R&T Program.
 - e. Southern Area Office/Northern Area Office**
 - i. The Offices provide language assistance services through use of the HCD provide interpreter services or through utilizing the nine Bilingual (Spanish) staff in translating verbal communications.

e. Southern Area Office/Northern Area Office

- i. The Office's plan to training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring sub-recipients.

f. Occupational Licensing

- i. The Occupational Licensing Program plans to training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring sub-recipients.

g. Manufactured Housing/Factory Built Housing Program

- i. MH/FBH program staff are trained on how to use translations services during onboarding. Refresher training is offered as needed. Bilingual staff are certified during the hiring process.

h. Admin/Operations

- i. Admin/Operations staff are trained on how to use translations services during onboarding. Refresher training is offered as needed. Bilingual staff are certified during the hiring process.

5. A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.

a. Registration and Titling

- i. The below documents need to be translated into Spanish. Program plans to complete translate by October 2022.
 1. [HCD 416](#) (PDF) — Application for Replacement Insignia
 2. [HCD RT 475.1](#) (PDF) — Bill of Sale
 3. [HCD RT 475.2](#) (PDF) — Certificate for Transfer Without Probate
 4. [HCD RT 475.3](#) (PDF) — Lien Satisfied
 5. [HCD 475.4](#) (PDF) — Power of Attorney
 6. [HCD RT 476.4](#) (PDF) — Certification of Retail Value and Purchase Price
 7. [HCD RT 476.6](#) (PDF) — Statement of Facts
 8. [HCD RT 476.6G](#) (PDF) — Multi-Purpose Transfer Form
 9. [HCD RT 476.6I](#) (PDF) — Statement of Facts – Bond
 10. [HCD RT 476.9](#) (PDF) — Change of Mailing Address for a Registered Owner, Legal Owner or Junior Lienholder
 11. [HCD RT 480.0](#) (PDF) — Bond or Undertaking Requirements for Manufactured Homes/Mobile

homes, Commercial Modulares, Truck Campers, and Floating Homes

12. [HCD RT 480.4](#) (PDF) — Application for Duplicate Certificate of Title
 13. [HCD RT 480.5](#) (PDF) — Application for Registration (New Title Information Only)
 14. [HCD RT 481.2](#) (PDF) — Application for Duplicate Registration Card
 15. [HCD 484.7](#) (PDF) — Statement to Encumber
 16. [HCD RT 486.1](#) (PDF) — HUD Label Location
 17. [HCD 486.4](#) (PDF) — Statement of Facts Salvage Units
 18. [HCD 488.4](#) (PDF) — Transfer on Death Beneficiary
 19. [HCD 490.9](#) (PDF) — Application for Substitute Decal
 20. [HCD RT 480.9](#) (PDF) — Notice of Situs Change for Manufactured Home, Mobile home, Multifamily Manufactured Home, or Floating Home
 21. [HCD RT 475.6](#) (PDF) — Statement of Error or Erasure
 22. [HCD RT 476.8](#) (PDF) — Notice of Sale or Transfer
2. Notices of Rights/Benefits
 1. Manufactured Home Registration Renewal Billing Notice.
 2. New R&T Deficiency Letter, Response Due.
 3. FAQs
 1. Business Customer Section FAQ and Guidebook (in the process of being approved for distribution to our customers).

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. Good Faith Resolution Inquiry Form – English only. The Spanish version is currently being routed for approval.
- ii. Standard Letters/Correspondence – English only. Translated upon request. Will evaluate translating some standard responses/verbiage by the end of 2022.
- iii. Outreach material – will be translated as needed

c. Mobilehome and Special Occupancy Parks Program

1. NA

d. Employee Housing Program

1. NA

e. Southern Area Office/Northern Area Office

- i. Below is a list of all forms that Office may submit to Interpreter's Unlimited, to be translated by October 2022.
 1. HCD 50 ERBS- Earthquake Resistant Bracing System Application
 2. HCD MH 604 Manufactured Home Alterations and Permit Guide
 3. HCD MH 527- Manufactured Home Electrical Load Worksheet
 4. Lot Marker Handout
 5. HCD MP 511 Alternate Approval Application
 6. HCD MP 520- Standard Plan Approval Application
 7. HCD 433A Notice of MH, CM Installation on a Foundation System
 8. HCD MP 514 Park Construction Approval Booklet
 9. Embankments and Slopes (Handout)
 10. Mobile home Installation Guide (Booklet)
 11. Gas Piping Extension (Handout).

f. Occupational Licensing

- i. NA

g. Manufactured Housing/Factory Built Housing Program

- i. NA

h. Admin/Operations

- i. Admin/Operations is a support unit that does not have public facing vital records.

6. Codes and Standards plan for translating informational materials that detail services and activities provided to Beneficiaries and Codes and Standards plan for providing appropriately translated notices to LEP persons.

a. Registration and Titling

- i. The Registration and Titling Program will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program will utilize the Department's translations services vendor to translate information materials and will provide translation services upon request.

c. Mobilehome and Special Occupancy Parks Program

- i. The Program will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.
 - d. Employee Housing Program**
 - i. The Employee Housing Program will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office..
 - e. Southern Area Office/Norther Area Office**
 - i. The Office will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.
 - f. Occupational Licensing**
 - i. The Occupational Licensing Program will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.
 - g. Manufactured Housing/Factory Built Housing Program**
 - i. At this time, there is no plan to translate MH/FBH programs services and activities into other languages.
 - h. Admin/Operations**
 - i. The Registration and Titling Program will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.
- 7. Codes and Standards plan for providing interpreters for large, medium, small and one-on-one meetings.**
 - a. Registration and Titling**
 - i. Registration and Titling currently uses the department's translation services vendor.
 - b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program**
 - i. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program will utilize the Department's translation services vendor as needed for meeting(s) hosted by MAC/MRLPP upon request.
 - c. Mobilehome and Special Occupancy Parks Program**
 - i. The Mobilehome and Special Occupancy Parks Programs will continue to inform the public of the availability of interpreters for focus groups and stakeholder meetings.
 - d. Employee Housing Program**

- i. The Employee Housing Program will continue to inform the public of the availability of interpreters for focus groups and stakeholder meetings.
 - e. **Southern Area Office/Northern Area Office**
 - i. Offices will reference documents provided by DEI unit in order to provide interpreters for large, medium, small, and 1:1 meetings.
 - f. **Occupational Licensing**
 - i. The Occupational Licensing Program will reference documents provided by DEI unit in order to provide interpreters for large, medium, small, and 1:1 meetings.
 - g. **Manufactured Housing/Factory Built Housing Program**
 - i. The MH/FBH programs uses the Department's translation services vendors as needed for meeting(s) hosted by our program, upon request.
 - h. **Admin/Operations**
 - i. The Admin/Operation Section will use the department's translation services vendor and will make translated materials accessible to our customers online and in the office.
- 8. **Codes and Standards plan for developing community resources, partnerships, and other relationships to help with the provision of language services.**
 - a. **Registration and Titling**
 - i. Registration and Titling plans to restart in-person outreach events to assist LEP customers.
 - b. **Mobilehome Assistance Center/Mobilehome Residency Law Protection Program**
 - i. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program has added additional language preferences to online complaint form (drop down menu) and is updating complaint forms for complainants to enter language preferences. Any newly created community resource documents will be translated using the Department's translation services vendor. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program will engage stakeholders as needed for feedback.
 - c. **Mobilehome and Special Occupancy Parks Program**
 - i. The Mobilehome and Special Occupancy Parks Programs do not develop community resources or establish partnerships for language service.
 - d. **Employee Housing Program**

- i. The Employee Housing Program does not develop community resources or establish partnerships for language service.

e. Southern Area Office/Northern Area Office

- i. The Offices do not develop community resources or establish partnerships for language service.

f. Occupational Licensing

- i. The Occupational Licensing Program does not develop community resources or establish partnerships for language service.

g. Manufactured Housing/Factory Built Housing Program

- i. Manufactured housing/factory built housing program does not develop community resources or establish partnerships.

h. Admin/Operations

- i. N/A

9. Codes and Standards plan for monitoring and updating the LAP.

a. Registration and Titling

- i. The Registration and Titling program will biannually monitor the language assistance services that are being provided in order to update the Language Assistance Plan.

b. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program

- i. Mobilehome Assistance Center/Mobilehome Residency Law Protection Program will biannually evaluate trends to improve services and will revise processes, procedures, forms, and the Language Assistance Plan as needed.

c. Mobilehome and Special Occupancy Parks Program

- i. The Mobilehome and Special Occupancy Parks Programs will biannually evaluate trends to improve services and will revise processes, procedures, and forms as needed.

d. Employee Housing Program

- i. Employee Housing Program will biannually evaluate trends to improve services and will revise processes, procedures, and forms as needed.

e. Southern Area Office/Northern Area Office

- i. Offices will biannually evaluate trends to improve services and will revise processes, procedures, and forms as needed.

f. Occupational Licensing

- i. Unit will monitor language assistance on a “as-needed” basis.

g. Manufactured Housing/Factory Built Housing Program

- i. The MH/FBH programs will biannually evaluate trends to improve services and will revise processes, procedures, and forms as needed.

h. Admin/Operations

- i. Admin/Operation will utilize data from the Amazon Connect phone system and the Biennial Surveys.

COMPLAINTS

If you believe that you have been denied the benefits of this Language Assistance Plan, you may file a written complaint by emailing the Diversity, Equity, and Inclusion Unit at DEI@hcd.ca.gov.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

Office of Fair Housing and Equal Opportunity
U. S. Department of Housing and Urban Development
400 State Avenue
Kansas City, Kansas 66101-2406

**California Department of Housing and Community
Development
Division of Federal Financial Assistance
Four-Factor Analysis**

PURPOSE

The California Department of Housing and Community Development (HCD) adheres to all state and federal laws regarding language access, including but not limited to, the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, Americans with Disabilities Act Amendments Act of 2008, Executive Order 131166, California Civil Rights Act (Unruh Civil Rights Act), Dymally-Alatorre Act, and Government Code section 11135. The purpose of this document is to identify to the staff and the public the Branches and Sections within the Division of State Financial Assistance that provide language access services, and the reasons for, and methods by which, these services are provided.

DIVISION OF FEDERAL FINANCIAL ASSISTANCE BACKGROUND

The Division of Federal Financial Assistance (DFFA) administers federally funded programs to award loans and grants for the construction, acquisition, rehabilitation, and preservation of affordable rental and ownership housing, homeless shelters, and transitional housing, public facilities and infrastructure, and the development of jobs for lower-income workers. DFFA administers the following funding programs that directly serve individuals:

Emergency Rental Assistance Program (ERAP)

The state rental assistance program is intended to help eligible households cover rental and utilities arrears and prospective payments for rent, and to provide funding for housing stabilization services. The goal of the program is to prevent evictions and housing instability due to the COVID-19 pandemic. SB 91 assistance is to be directed to the primary period of the pandemic, which was declared a national emergency on March 13, 2020. The eligible period of assistance for rental arrears extends from April 1, 2020, until March 31, 2021. Arrears must have been incurred during this time period in order to be eligible for financial relief through this program. Current and prospective rents and utilities are eligible throughout the operational period of this funding.

Owner Occupied Rehabilitation and Reconstruction Program

The Owner Occupied Rehabilitation and Reconstruction Program is intended to help California homeowners affected by federally declared disasters to rebuild their disaster damaged primary residences. The program is currently serving people affected by 2017 and 2018 federally declared disasters across California.

COMPLIANCE WITH LIMITED ENGLISH PROFICIENT REQUIREMENTS

WHO MUST COMPLY?

Pursuant to Executive Order 13166, the meaningful access requirement of Title VI, the Title VI regulations, and the four-factor analysis set forth in the Department of Justice's (DOJ's) revised Limited English Proficient (LEP) Guidance, 67 FR 117 (June 18, 2002), apply to the programs and activities of federal agencies, including HCD. Federal financial assistance includes grants, cooperative agreements, training, and use of equipment, donations of surplus property, and other assistance. All programs and operations of entities that receive federal funds or assistance (recipients and sub-recipients) include:

- State agencies
- Local agencies
- Private and nonprofit entities
- All programs and operations of the federal government

All employees must ensure the public is treated with dignity and respect, identify the language needs for HCD's customers, and utilize available bilingual resources to assist customers, when needed.

DETERMINING THE NEED: FOUR-FACTOR ANALYSIS

1. The Division of Federal Financial Assistance did not participate in the 2020 Dymally-Alatorre language survey period. As a result, each program used the following data to determine their populations:

- a. **Emergency Rental Assistance Program**

Based on the language preference indicated by ERAP applicants in the application, the number of individuals with limited English proficiency (preferred language selected does not equal to English) is 54,566 or 12% of the total applications submitted to-date. Please note a language is defaulted to English if the applicant chose not to provide a preference.

Language	Submitted Applications	% of Total
English	399,654	88.0%
Spanish	44,159	9.7%
Chinese	3,431	0.8%
Korean	3,152	0.7%
Russian	1,399	0.3%
Vietnamese	1,249	0.3%
Filipino	715	0.2%
Portuguese	461	0.1%

b. Owner Occupied Rehabilitation and Reconstruction Program
Based on the American Community Survey, the below table identifies the percentages of each service county that have limited English proficiency.

Language	Butte County	Lake County	LA Cour	Mendocino County	Napa County	Nevada County	Orange County	San Diego County	Santa Barbara County	Shasta County	Sonoma County	Ventura County	Yuba County
Total:	213,433	60,464	9,470,085	82,148	132,570	95,067	2,980,221	3,106,393	416,670	168,668	474,635	796,738	70,367
Spanish	3.31%	6.18%	15.83%	7.56%	12.58%	1.08%	10.13%	8.65%	15.30%	1.13%	9.18%	12.20%	6.52%
French, Haitian, or Cajun:	0.01%	0.00%	0.07%	0.05%	0.08%	0.03%	0.05%	0.05%	0.03%	0.01%	0.06%	0.02%	0.02%
German or other West Germanic languages:	0.02%	0.07%	0.03%	0.01%	0.06%	0.03%	0.04%	0.05%	0.12%	0.09%	0.03%	0.07%	0.00%
Russian, Polish, or other Slavic	0.06%	0.00%	0.29%	0.05%	0.06%	0.08%	0.14%	0.20%	0.07%	0.03%	0.12%	0.09%	0.01%
Other Indo-European	0.24%	0.10%	1.50%	0.25%	0.57%	0.11%	0.90%	0.55%	0.19%	0.24%	0.40%	0.38%	0.37%
Korean:	0.10%	0.00%	1.09%	0.08%	0.05%	0.02%	1.40%	0.25%	0.12%	0.02%	0.09%	0.19%	0.00%
Chinese (incl. Mandarin, Vietnamese:	0.16%	0.02%	2.43%	0.17%	0.27%	0.16%	1.52%	0.77%	0.59%	0.21%	0.39%	0.42%	0.03%
Tagalog (incl. Filipino):	0.11%	0.21%	0.76%	0.10%	1.24%	0.04%	0.48%	1.05%	0.44%	0.08%	0.14%	0.49%	0.17%
Other Asian and Pacific Island	1.19%	0.04%	0.78%	0.08%	0.26%	0.11%	0.66%	0.53%	0.30%	0.31%	0.38%	0.30%	1.23%
Arabic:	0.05%	0.00%	0.18%	0.00%	0.08%	0.03%	0.27%	0.43%	0.11%	0.01%	0.03%	0.12%	0.01%
Other and unspecified	0.03%	0.00%	0.14%	0.02%	0.01%	0.07%	0.07%	0.37%	0.16%	0.02%	0.10%	0.37%	0.20%

2. The Division of Federal Financial Assistance identified their communication vehicle frequency and importance as follows:

a. Emergency Rental Assistance Program

i. Phone:

1. Frequency: On an ad hoc basis, applicant may contact the program via our program call center to receive support for general inquiries or specific case actions (e.g. re-open of an inactive application, request program participation form, etc.).
2. Importance: Accessibility through the phone is highlighted more during the pandemic. Separate from appointment schedule it serves more of a purpose. Most, if not all, individuals would be able to make a phone call.

ii. In-Person:

1. Frequency: Community Based Organizations (Local Partner Networks) schedule in person-appointments and walk-ins with their respective community for general inquiries, submit applications and throughout their application process which allowed service to those in most immediate assistance with rental assistance.
2. Importance: serves communities who do not have access to internet. Serves its purpose so that customers can ask their questions. Then goes through the process of qualifying for the program.

iii. Written: Frequency and Importance

1. Invitation to apply: receives an email invitation to apply for ERAP; triggered by a submitted landlord application.
2. Invitation to apply: receives a paper notice to apply for ERAP; triggered by a submitted landlord application

3. Application submission: receives an email acknowledgment from the program on the successful submission of the ERAP application.
 4. Request for information/documentation: receives an email to provide additional information as determined by case management staff.
 5. Determination notice: email to notify program determination and award details if approved.
 6. Invite to recertify: email to apply for recertification; this is triggered at the time of application approval.
 7. Recertification submission: receives an email acknowledgment from the program on the successful submission of the ERAP application.
 8. Recertification: request for information/documentation: receives an email to provide additional information as determined by case management staff.
 9. Recertification determination notice: email to notify program determination and award details if approved.
- iv. Online portals: Frequency and Importance
1. Primary point of interaction between the public and the program. After a user profile is established, online portal serves as primary access point for the applicant (tenant or landlord) to submit application, respond to tasks requesting information and/or documentation, retrieve program notifications/forms, and apply for additional assistance (recertification).
 2. Accessibility
 1. Accessibility is determined through the local networks. They are the ones that determine accessibility and make the portals accessible.
- v. Outreach/Marketing
1. Grass roots marketing
 1. Community events for underserved areas. Information was provided in conjunction with radio, tv, and other media outlets.
 2. Media
 1. Social media
 2. Advertising
 3. Radio
 4. News outlets
 5. Television
 3. HCD's Communications Division

b. Owner Occupied Rehabilitation and Reconstruction Program

- i. Phone:

1. Frequency: Most common, this is primary touchpoint once individual has filled out program survey. This is a way to describe and assist with vital documents.
 2. Importance: Most important, phone is the primary mode of contact for applicants.
 - ii. In-Person: Frequency
 1. N/A
 - iii. Written:
 1. Frequency: email and paper letter. Common, this is used when online portals and phone are not working properly and is used to advertise the program to possible future recipients
 2. Importance: any program documents have to be signed, still important.
 - iv. Online portals:
 1. Frequency: Common, all program applications and vital documents are filled out and submitted through online portals e-grants and DocuSign – Case managers assigned to each recipient to ensure accessibility
 2. Importance: High importance.
 3. Accessibility: ADA remediation for all documentation is conducted. Can call case management phone number if they require further assistance.
 - v. Outreach/Marketing
 1. All outreach documents are currently available in English and Spanish, and if any other language reach threshold requirements, Owner Occupied Rehabilitation and Reconstruction Program vendor will translate into any other threshold languages.
 2. Importance: Will conduct outreach eventually for new grant, but no current outreach is being conducted.
3. The Division of Federal Financial Assistance identified all vital documents that need to be, or already are, translated into their identified threshold languages:

a. Emergency Rental Assistance Program

Emergency Rental Assistance Program translates the following vital documents into Spanish:

- i. Renter Application
- ii. Landlord Application
- iii. Frequently Asked Questions
- iv. CA COVID-19 Rent Relief Landlord Letter to Renter
- v. CA COVID-19 Rent Relief Letter to Landlord
- vi. Declaration of COVID-19-Related Financial Distress
- vii. Program Highlights

- viii. Program Details
- ix. Resources through Local Partner Network
 - x. Landlord Denial Notification
- xi. Tenant Denial Notification
- xii. Approval Letter
- xiii. Task Assignments
- xiv. Email Reminders
- xv. Appeal Approval Letter
- xvi. Appeal Denial Letter
- xvii. Application in Process Notification
- xviii. Document Upload Reminders
- xix. Accessibility

b. Owner Occupied Rehabilitation and Reconstruction Program

The Owner Occupied Rehabilitation and Reconstruction Program translates the following vital documents into Spanish:

- i. Survey
- ii. Application
- iii. Right to Entry
- iv. Fraud Acknowledgement
- v. Policies and Procedures
- vi. DOB Procedures
- vii. HC Procedures
- viii. Construction Steps and Homeowner Responsibilities
- ix. Housing Counseling Waiver
- x. Same Footprint Affidavit
- xi. Appeals Form
- xii. Homeowner Certifications
- xiii. Consent and Release

4. The Division of Federal Financial Assistance identified their resources to provide language service to LEP individuals:

a. Emergency Rental Assistance Program

i. Bilingual staff

1. This is currently provided by vendor staff. Call center has bilingual staff supporting the main languages (Chinese, English, Spanish, Tagalog, Korean, Spanish) defined in the service contract. Agents are trained on the appropriate program policy and provide callers with resources (information, instructions on how to navigate the online application, status check, etc.) on the program. If the caller requires language support beyond the list of main languages, vendor has access to translation service provider who can be conferenced-in on a case-by-case basis and provide real time translations for the caller.

- ii. Vendor services
 - 1. This is currently provided by vendor staff. Call center has bilingual staff supporting the main languages (Chinese, English, Spanish, Tagalog, Korean, Spanish) defined in the service contract. Agents are trained on the appropriate program policy and provide callers with resources (information, instructions on how to navigate the online application, status check, etc.) on the program. If the caller requires language support beyond the list of main languages, vendor has access to translation service provider who can be conferenced-in on a case-by-case basis and provide real time translations for the caller.
- iii. Written translation
 - 1. This is currently provided by vendor staff. Call center has bilingual staff supporting the main languages (Chinese, English, Spanish, Tagalog, Korean, Spanish) defined in the service contract.
- iv. Interpreters
 - 1. Through the program's local partner network, identified community-based organizations (CBOs) under contract with our partnership network vendor provide outreach effort in language based on audience engagement. This is also supported through a vendor contract.
- v. ASL
 - 1. The CA Rent Relief website has an Accessibility tab, which provides instructions for persons who have limitations in hearing or speaking. They may contact a specially trained Communications Assistant (CA) by dialing 711, and the CA can relay telephone conversations on their behalf.
- vi. Notices/Taglines
 - 1. Interactions with the program's web-based portal display in one of the main languages dependent on the language preference selected by the user. Program eligibility notices and SMS messages are also distributed in language per user preference.
- vii. Training
 - 1. HCD staff participated in Language Access Program training and were provided the Language Assistance Handbook for reference.
- viii. Established grievance process
 - 1. Program has established channels (e.g. ERAP inbox, constituent services) to receive inputs from program participants, legislative representative, or advocacy groups. Submitted grievances are reviewed by State program staff.

- ix. Monitor response to complaints
 - 1. Program has established channels (e.g. Emergency Rental Assistance Program inbox, constituent services) to receive inputs from program participants, legislative representative, or advocacy groups. Submitted grievances are reviewed by State program staff. Depending on the triage outcome, the case can be escalated/forwarded to one or more of the following actions:
 - a. Provide necessary corrective action in Owner Occupied Rehabilitation and Reconstruction Program with vendor team.
 - b. Owner Occupied Rehabilitation and Reconstruction Program with vendor call center to improve call routing, language access/agent availability based on volume, or operation procedure.
 - c. Review and revise program print media to improve language access.
 - d. Review and revise program website to improve language access.
- x. Monitoring and updating four-factor analysis, including seeking input from beneficiaries receiving direct services
 - 1. Program meets regularly with local jurisdictions (County/City), CBOs, and advocacy groups to receive feedback about the program and obstacles their constituents are experiencing. The program will use this information to update the four-factor analysis and to improve the program's communications with the population it serves.
- xi. Collaboration
 - 1. Program engages in on-going collaborations with local jurisdictions (County/City) and CBOs under contract with partnership network vendor. Provide outreach effort in language based on audience engagement. This is also supported through a vendor contract.

b. Owner Occupied Rehabilitation and Reconstruction Program

- i. Bilingual staff
 - 1. The Owner Occupied Rehabilitation and Reconstruction Program currently has bilingual staff in Spanish and Mandarin, and oral interpretation is available through Owner Occupied Rehabilitation and Reconstruction Program vendor upon request.
- ii. Vendor services – Owner Occupied Rehabilitation and Reconstruction Program Vendor, HORNE, provides oral

- interpretation and written translation services for the Owner Occupied Rehabilitation and Reconstruction Program.
- iii. Written translation
 - 1. All vital program documents are currently available in Spanish and are made available in other languages upon request.
 - iv. Outreach effectively to the LEP community
 - 1. Interpreters
 - a. All outreach materials are provided in Spanish as well as English. All written materials include a tagline page detailing in 12 languages how to access program materials in their preferred language. OOR vendors also provide interpretation services.
 - 2. ASL
 - a. Nothing is in person so ASL is not really conducted that way. ASL can be utilized over the phone via interpretation services. Currently a vendor is utilized for services.
 - v. Notices/Taglines –
 - 1. The OOR program has developed taglines in any written communication and the website is also being updated in order to instruct the public how to access language services in the 12 most common non-English languages in the served counties.
 - vi. Training
 - 1. Owner Occupied Rehabilitation and Reconstruction Program staff attended the LAP training session offered by HCD.
 - vii. Established grievance process
 - 1. Owner Occupied Rehabilitation and Reconstruction Program will have any grievances sent to the Diversity, Equity and Inclusion Unit and the instructions for how to submit a grievance will be available on Owner Occupied Rehabilitation and Reconstruction Program website once the LAP is complete.
 - viii. Monitor response to complaints
 - 1. Owner Occupied Rehabilitation and Reconstruction Program will keep a record of all language access complaints and the nature of the complaints to monitor possible changes to the Owner Occupied Rehabilitation and Reconstruction Program LAP.
 - ix. Monitoring and updating four factor analysis, including seeking input from beneficiaries receiving direct services:
 - 1. Owner Occupied Rehabilitation and Reconstruction Program will keep a record of all language access

complaints and the nature of the complaints to monitor possible changes to the Owner Occupied Rehabilitation and Reconstruction Program LAP.

- x. Collaboration
 - 1. Owner Occupied Rehabilitation and Reconstruction Program has previously developed community partnerships, and due to the lack of need for interpretation beyond Spanish for Owner Occupied Rehabilitation and Reconstruction Program applicants, Owner Occupied Rehabilitation and Reconstruction Program has not developed community partnerships based on language. Given the biannual audits, Owner Occupied Rehabilitation and Reconstruction Program will work to develop community partnership based on language if the audits prove this is relevant.

A. EMERGENCY RENTAL ASSISTANCE PROGRAM/OWNER OCCUPIED REHABILITATION AND RECONSTRUCTION PROGRAM (DFFA) LANGUAGE ASSISTANCE PLAN

As a result of the preceding Four-Factor Analysis, DFFA has developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons DFFA serves, the process by which DFFA will monitor and update the LAP.

DFFA understands that the actions the programs are expected to take to meet its LEP obligations depend upon the results of the Four-Factor Analysis including the services offered, service area, resources possessed, and the cost of various language service options. However, DFFA is to take reasonable steps to ensure meaningful access to LEP persons. The meaningful access is based upon a reasonableness standard that is both flexible and fact dependent.

- 1. The procedures DFFA will use to identify LEP persons with whom DFFA has contact, the size of LEP populations, and the languages of LEP populations.**
 - a. Emergency Rental Assistance Program**
 - i. Emergency Rental Assistance Program will use the vendor's reports to identify the LEP population in which the program comes into contact. The report also identifies the size of the population and the languages of the LEP population.
 - b. Owner Occupied Rehabilitation and Reconstruction Program**
 - i. Owner Occupied Rehabilitation and Reconstruction Program will use language preference question on our application to identify LEP persons the program has contact with, census cross referenced with areas served

to determine size of LEP populations, potential applicants and the languages of LEP populations.

2. Points and types of contact DFFA may have with LEP persons.

a. Emergency Rental Assistance Program

- i. Emergency Rental Assistance Program may have contact with LEP persons through the landlord and tenant online application portals, through calls to the call center, or through the program email inbox. Bilingual staff are available at the call center to work with individuals to provide language assistance. The program vendor provides oral interpretation and written translation services when bilingual staff are unavailable or for non-threshold languages.

1. Owner Occupied Rehabilitation and Reconstruction Program

- i. Phone: Most common, this is primary touchpoint once individual has filled out program survey. This is a way to describe and assist with vital documents.
- ii. In-Person: None
- iii. Written: email and paper letter. Common, this is used when online portals and phone are not working properly and is used to advertise the program to possible future recipients
- iv. Online portals: Common, all program applications and vital documents are filled out and submitted through online portals e-grants and DocuSign – Case managers assigned to each recipient to ensure accessibility
- v. Outreach/Marketing: outreach for the program has already been completed

3. Ways in which language assistance will be provided by DFFA, and the plan for outreach to LEP populations.

a. Emergency Rental Assistance Program

- i. Language assistance is provided to LEP populations through our website, the vendor for the call center, and by our Local Partner Networks participants who serve communities in their area. The program will continue to work with these resources to provide language assistance as needed.

b. Owner Occupied Rehabilitation and Reconstruction Program

- i. All outreach materials are provided in Spanish as well as English. All written materials include a tagline page detailing in 12 languages how to access program materials in their preferred language. OOR vendors also provide interpretation services.

4. **DFFA plan for training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring sub-recipients.**
 - a. **Emergency Rental Assistance Program**
 - i. Vendor staff undergo training on program policy and operating procedures. Training scope and material used are described further in the vendor's training plan deliverable.
 - ii. HCD staff participated in Language Access Program training and were provided the Language Assistance Handbook for reference.
 - b. **Owner Occupied Rehabilitation and Reconstruction Program**
 - i. New staff will be trained on LAP and program has just hired one representative who speaks Spanish to assist with Spanish speaking populations when necessary. Additionally, vendors have been providing interpretation services in line with the HUD required language access plan and will be trained in the updated language access plan once it is finalized.
5. **A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.**
 - a. **Emergency Rental Assistance Program**
 - i. The Emergency Rental Assistance Program Vital Documents have been translated in the identified threshold languages. If additional documents are identified due to program changes, Emergency Rental Assistance Program will work with the vendor to implement the changes typically within a two week period.
 1. Renter Application
 2. Landlord Application
 3. Frequently Asked Questions
 4. CA COVID-19 Rent Relief Landlord Letter to Renter
 5. CA COVID-19 Rent Relief Letter to Landlord
 6. Declaration of COVID-19-Related Financial Distress
 7. Program Highlights
 8. Program Details
 9. Resources through Local Partner Network
 10. Landlord Denial Notification
 11. Tenant Denial Notification
 12. Approval Letter
 13. Task Assignments
 14. Email Reminders
 15. Appeal Approval Letter
 16. Appeal Denial Letter
 17. Application in Process Notification
 18. Document Upload Reminders
 19. Accessibility

b. Owner Occupied Rehabilitation and Reconstruction Program

The program documents have been translated in the identified threshold language (Spanish). If additional documents are identified due to program changes, Owner Occupied Rehabilitation and Reconstruction Program will work with the vendor to implement the changes typically within a two week period.

- i. Survey
- ii. Application
- iii. Right to Entry
- iv. Fraud Acknowledgement
- v. Policies and Procedures
- vi. DOB Procedures
- vii. HC Procedures
- viii. Construction Steps and Homeowner Responsibilities
- ix. Housing Counseling Waiver
- x. Same Footprint Affidavit
- xi. Appeals Form
- xii. Homeowner Certifications
- xiii. Consent and Release
- xiv. All have already been translated into Spanish. No other languages meet the threshold requirements and will be translated into alternative languages upon request within five business days.

6. DFFA’s plan for translating informational materials that detail services and activities provided to Beneficiaries and DFFA plan for providing appropriately translated notices to LEP persons.

a. Emergency Rental Assistance Program

- i. Program has translated informational materials that detail services and activities provided to Beneficiaries of Emergency Rental Assistance Program. If additional information is identified that need to be translated, Emergency Rental Assistance Program will work with the vendor to implement the changes typically within a two week period.

b. Owner Occupied Rehabilitation and Reconstruction Program

- i. Vital documents are translated into Spanish, which is the only threshold language. Additionally, Owner Occupied Rehabilitation and Reconstruction Program has a tagline mailer insert in the 12 most common non-English languages that is included with all written communication. Additionally, the Owner Occupied Rehabilitation and Reconstruction Program website will include these taglines and already has google translate function on the website.

7. **DFFA’s plan for providing interpreters for large, medium, and small and one-on-one meetings.**
 - a. **Emergency Rental Assistance Program**
 - i. Emergency Rental Assistance Program has oral interpretation and written translation services available through the vendor’s call center, which may be accessed on an as needed basis. Emergency Rental Assistance Program also utilizes Local Partner Networks who can support different language services with their in-house staff.
 - b. **Owner Occupied Rehabilitation and Reconstruction Program**
 - i. Vendor provides phone interpretation services for all sized meetings.
8. **DFFA’s plan for developing community resources, partnerships, and other relationships to help with the provision of language services.**
 - a. **Emergency Rental Assistance Program**
 - i. Emergency Rental Assistance Program works with the Local Partner Network staff to assist with different languages within their communities. The LPN can help LEP with applying for program assistance, submitting supporting documentation, following up on application statuses and appealing a program decision.
 - b. **Owner Occupied Rehabilitation and Reconstruction Program**
 - i. Owner Occupied Rehabilitation and Reconstruction Program has previously developed community partnerships, and due to the lack of need for interpretation needs for Owner Occupied Rehabilitation and Reconstruction Program applicants, has not developed community partnerships based on language. Given the biannual audits, Owner Occupied Rehabilitation and Reconstruction Program will work to develop community partnership based on language if the audits prove this is relevant.
9. **DFFA’s plan for monitoring and updating the LAP.**
 - a. **Emergency Rental Assistance Program**
 - i. Emergency Rental Assistance Program will monitor the LAP every six months and make adjustments based on program changes, as necessary.
 - b. **Owner Occupied Rehabilitation and Reconstruction Program**
 - i. Quarterly LAP Audits to determine if any new languages meet the language threshold.

COMPLAINTS

If you believe that you have been denied the benefits of this Language Assistance Plan, you may file a written complaint by emailing the Diversity, Equity, and Inclusion Unit at DEI@hcd.ca.gov.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

Office of Fair Housing and Equal Opportunity
U. S. Department of Housing and Urban Development
400 State Avenue
Kansas City, Kansas 66101-2406

**California Department of Housing and Community
Development
Division of State Financial Assistance
Four-Factor Analysis**

PURPOSE

The California Department of Housing and Community Development (HCD) adheres to all state and federal laws regarding language access, including but not limited to, the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, Americans with Disabilities Act Amendments Act of 2008, Executive Order 131166, California Civil Rights Act (Unruh Civil Rights Act), Dymally-Alatorre Act, and Government Code section 11135. The purpose of this document is to identify to the staff and the public the Branches and Sections within the Division of State Financial Assistance that provide language access services, and the reasons for, and methods by which, these services are provided.

PROGRAM: STATE GRANTS MANAGEMENT BACKGROUND

State Grants Managements' purpose is to facilitate affordable and financially responsible housing opportunities for all Californians by disbursing funds and confirming compliance of state programs.

PROGRAM: OFFICE OF MIGRANT SERVICES BACKGROUND

Each year during the summer planting and harvesting season, April through October, agricultural farm workers and their family households migrate from their homes (predominately from Mexico, Texas, and Arizona) to work in California's fields and canneries. This sudden influx of family households to California's rural areas presented a substantial strain on the already overburdened local affordable housing market. Those families that were not able to afford any type of housing ended up living along streambeds or orchards in their cars or makeshift shanty style dwellings without indoor plumbing, electricity, or sewer systems.

It was these unhealthy living conditions that prompted Edmund G. Brown, governor of the State of California, in cooperation with the U.S. government, to develop and establish migratory housing centers throughout California in the early 1960s. The Office of Migrant Services (OMS) was established by the State and U.S. Department of Labor in 1965 to serve the housing needs of California's migrant farm worker family households.

**PROGRAM: ASSET MANAGEMENT & COMPLIANCE LOAN PROGRAMS
(CALDAP, CHAP, CHRP, DPRLP, HOME, MPROP, SERA) BACKGROUND**

HOME – is a Federally funded loan program to enable households to buy their own home.

All other programs listed below are State funded loan programs to enable households to buy their own home or mobile home or pay for repair of their home damaged by a natural disaster. The seven program loans and the approximate number of currently active loans that HCD is monitoring loan compliance are:

- 1) CALDAP – California Disaster Assistance Program (148) - The CALDAP program was designed to provide “last resort” funding for the unmet housing rehabilitation needs of single-family homeowners whose property is damaged by a governor proclaimed natural disaster.
- 2) CHAP – California Homeownership Assistance Program (25) – The CHAP program’s goal was assisting first-time home buyers buy their own home.
- 3) CHRP-O – California Housing Rehabilitation Program – ownership (92) - designed to assist low-income homeowners with rehabilitation projects.
- 4) DPRLP – Deferred Payment Rehabilitation Loan Program (34) - designed to assist low-income homeowners with rehabilitation projects.
- 5) HOME (600) – Assist cities, counties, developers, and nonprofit Community Housing Development Organizations to create and retain affordable housing home ownership.
- 6) MPROP – Mobilehome Park Resident Ownership Program (86) – designed to assist low-income households to purchase a mobile home and parcel in which to reside as their primary residence. This is the only program where some of the loan documents require a monthly mandatory payment.
- 7) SERA – State Earthquake Rehabilitation Assistance - ownership (34) - designed to provide for the unmet housing rehabilitation needs of single-family homeowners whose property was damaged by an earthquake.

Total number of loans: 1,029 (approximately 20 percent of these borrowers are presumed to speak English with limited proficiency, or 205 households)

COMPLIANCE WITH LIMITED ENGLISH PROFICIENT REQUIREMENTS

WHO MUST COMPLY?

Pursuant to Executive Order 13166, the meaningful access requirement of Title VI, the Title VI regulations, and the four-factor analysis set forth in the Department of Justice’s (DOJ’s) revised Limited English Proficient (LEP) Guidance, 67 FR 117 (June 18, 2002), apply to the programs and activities of federal agencies, including HCD. Federal financial assistance includes grants, cooperative agreements, training, and use of equipment, donations of surplus property, and other assistance. All programs and operations of entities that receive federal funds or assistance (recipients and sub-recipients) include:

- State agencies
- Local agencies
- Private and nonprofit entities
- All programs and operations of the federal government

All employees must ensure the public is treated with dignity and respect, identify the language needs for HCD’s customers, and utilize available bilingual resources to assist customers, when needed.

DETERMINING THE NEED: FOUR-FACTOR ANALYSIS

1. The Division of State Financial Assistance participated in the 2020 Dymally-Alatorre language survey. During this survey period they had the following data:

a. State Grant Management (SGM)

- i. The Joe Serna Farmworker Home Grant has been recently inherited from Asset Management Compliance, and now manages a population with 98% Spanish speakers, who are primarily serviced in Spanish by SGM staff. Certification letters are sent annually in Spanish and two representatives are available via phone for additional questions. The current demand is satisfied with two bi-lingual representatives. For all other programs under State Grant Management the Census data will be used to determine if additional languages are needed.

b. Office of Migrant Services

- i. The Office of Migrant Services utilizes data from the Dymally-Alatorre language survey, and the program met the five percent threshold in Spanish.

c. Asset Management and Compliance

- i. Biennial survey and based on historical annual responses to the annual January Letter that Asset Management and Compliance (AMC) sends out to single family homeowner loan borrowers every January. We estimate 20 percent of total of each of the seven loan programs listed above are LEP individuals and households. Approximately 20 percent are identified as being proficient in Spanish, in addition to their ability to speak English. AMC annually sends out a January Letter and Annual Verification (AV) form in both English and Spanish to all borrowers. We ask all borrowers to complete the AV, sign it and return it to AMC in the self-addressed envelope provided. Based on which language they choose to fill-out the AV when they return it, we have estimated that 20 percent of our borrowers speak Spanish more proficiently than English.

2. The Division of State Financial Assistance identified their communication vehicle. They identified their communication vehicles as follows:

a. State Grant Management

- i. Phone
 - 1. Frequency: Seasonally high for Farm Worker Housing Grant program. Season is inconsistent, but it is scheduled for the second quarter of each year.
 - 2. Importance: High
- ii. In-Person:
 - 1. N/A
- iii. Written:
 - 1. Frequency: Seasonally high for Farm Worker Housing Grant program. Season is inconsistent, but it is scheduled for the second quarter of each year.
 - 2. Importance: High
- iv. Online portals
 - 1. Frequency: Seldom use
 - 2. Importance: Low
- v. Outreach/Marketing

1. N/A

b. Office of Migrant Services

i. Phone

1. Frequency: Rarely deal with individuals outside of the migrant centers.
2. Importance: Communication importance varies. Phone calls from individuals only come to OMS if they are not dealing with the center manager.

ii. In-Person:

1. Frequency: Rarely deal with individuals unless they are with site inspections.
2. Importance: Communication importance varies.

iii. Written:

1. Frequency: Written communication only goes through center managers. Only way we deal with written communication is if there was a complaint filed.
2. Importance: Communication importance varies depending on situation. Most communication goes through the center manager.

iv. Online portals

1. We don't utilize online portals. Information found online would be all there is.

v. Outreach/Marketing

1. We don't utilize outreach/marketing.

c. Asset Management and Compliance

i. Phone

1. We offer a toll-free public phone number (866-999-3913) that has a message to choose "1" for English and "2" for Spanish speakers. AMC has 5 HCD Rep-Its (3 are bilingual Spanish/English) to cover in-coming calls. We have an email box (Homeownerloan@hcd.ca.gov) from which we can accept requested documents and customer service requests. We send out a January loan balance letter **annually**, with an Annual Verification (AV) questionnaire that we ask all borrowers to complete, sign and send back to HCD. The January loan balance letter and Annual Verification are sent out to all borrowers in both Spanish and English.
2. It is important for borrowers to respond affirmatively back to Asset Management and Compliance, for Asset Management and Compliance to determine if the household can continue benefiting from the deferred payment loan program or be determined, by lack of response, or other action, to have caused a default in the loan. If Asset Management Compliance determines a default has occurred, then Asset Management Compliance may seek a remedy, including calling the loan due. Therefore, communication via phone is important as a means to retrieve this information.

3. The questions that are asked of each borrower in the Annual Verification focus on the main requirements of Loan Compliance, including:
 - i. Borrower resides on property with the HCD lien as their primary residence,
 - ii. Borrower is current with property taxes
 - iii. Borrower is current with all other liens
 - iv. Borrower has home insurance which complies with HCD's insurance requirements, such as naming the Department as Lender Loss Payee.
 - v. Borrower is current with mobile home park annual association dues.
 - vi. Borrower has not executed any new debt that creates a lien of the property, without the Department's prior written approval.
4. Frequency: only utilized once or twice a year during February and March.
 - i. In-Person:
 1. Information that is passed between individuals is important.
 2. Seldom is customer service provided in-person, but it has happened on a case-by-case basis.
 - ii. Written:
 1. The January Letter and accompanying Annual Verification form are sent out twice a year in both English and Spanish. Initially it is sent in January because the letter contains the balance of their loan principal and accrued interest as of December 31st of the previous year. We then send the same letter and AV out a second time, after the deadline of the first mailing (April 1) has passed to those who did not reply to the first mailing. Each time AMC sends letters out, we get a spike of in-coming calls, emails, and completed and incomplete AV's.
 2. All written communication is important.
 3. Frequency: only utilized once or twice a year during February and March.
 - iii. Online portals
 1. Not available.
 - iv. Outreach/Marketing
 1. Our only outreach beyond the January Letter, is a letter to existing borrowers asking them to provide us with a new mailing address and other contact information if we haven't communicated with them for at least two-straight years. We do not do outreach to households who do not already have a loan with HCD. The template for the letter used in this case is not currently translated into Spanish or have a tag line.
 2. All documentation that is sent is important.
 3. Frequency: only utilized once or twice a year during February and March.

3. The Division of State Financial Assistance identified all vital documents that need to be, or already are, translated into Spanish (Spanish is the only threshold language that the programs met):
 - a. **State Grant Management**
 - i. Certification Survey documents
 - ii. FAQs
 - iii. Accessibility
 - b. **Office of Migrant Services**
 - i. Residential dwelling lease agreements for migrant housing
 - ii. Health and Safety Related Notices i.e., Social Distancing Protocols, flyers.
 - iii. Notices related to non-seasonal migrant housing operations i.e., extension requests, eligibility for extensions, etc.
 - iv. Stakeholder meeting agendas, presentations, etc.
 - v. Resident handbooks
 - vi. Correspondence to residents and/or the public
 - c. **Asset Management and Compliance**
 - i. January Letter that contains a Loan Balance Statement.
 - ii. An Annual Verification form (AV)
 - iii. Back-up documentation asked by AMC in the AV for the borrower to send back to AMC may include the following:
 1. first lender's monthly statement
 2. proof of home insurance
 3. proof property taxes are paid current
 4. proof mobile home park assoc. dues are paid current
 5. all documents listed in iii above are in English and not provided in another language mainly because they come from another government agency or business.
 - iv. Documents which the borrowers can ask us to send them concerning their loan may include the following:
 1. borrower's Promissory Note
 2. borrower's Deed of Trust
 3. borrower's Loan (or Regulatory) Agreement
 4. Payment Demand Letter
 5. borrower's reconveyance of loan, after paid in full
4. The Division of State Financial Assistance identified their resources to provide language service to LEP individuals:
 - a. **State Grant Management**
 - i. Bilingual staff
 1. State Grant Management utilizes bilingual staff.
 - ii. Vendor services

1. State Grant Management utilizes HCD's vendor services that provide assistance in languages other than Spanish and written translation services.
- iii. Written translation
 1. State Grant Management utilizes written translation services except for the Farm Worker Housing Grant program.
- iv. ASL
 1. State Grant Management utilizes ASL interpretation services.
- v. Notices/Taglines
 1. State Grant Management does not utilize notices and/or taglines.
- vi. Training
 1. The Diversity, Equity, and Inclusion (DEI) Unit offers training for HCD. All department employees are trained in their obligation to provide language services.
- vii. Established grievance process
 1. Utilize the DEI Unit inbox (DEI@hcd.ca.gov)
- viii. Monitor response to complaints
 1. Handled by bilingual staff
- ix. Monitoring and updating four-factor analysis, including seeking input from beneficiaries receiving direct services
 1. Not appointed nor currently directed to a specific group or staff
- x. Collaboration
 1. The program continues to introduce the bilingual staff at meetings in order to remind all units of the resource available should a written or verbal request may be needed for assistance. As a participant of the DSFA, have also provided resources to units available at Inside HCD for bilingual staff of various languages.

b. Office of Migrant Services

- i. Bilingual staff
 1. The Office of Migrant Services utilizes bilingual staff.
- ii. Vendor services
 1. The Office of Migrant Services utilizes HCD's vendor services.
- iii. Written translation
 1. The Office of Migrant Services utilizes written translation.
- iv. ASL
 1. The Office of Migrant Services does not utilize ASL interpretation.
- v. Notices/Taglines
 1. We do not. Language services are provided by bilingual staff within the Office of Migrant Services program if needed
- vi. Training

1. The Diversity, Equity, and Inclusion (DEI) Unit offers training for HCD. All department employees are trained in their obligation to provide language services.
- vii. Established grievance process
 1. Utilize the DEI Unit inbox (DEI@hcd.ca.gov)
- viii. Monitor response to complaints
 1. Complaints are handled by bilingual onsite staff at the migrant centers
- ix. Monitoring and updating four-factor analysis, including seeking input from beneficiaries receiving direct services
 1. Services are provided by bilingual only staff. Most communication goes through center manager.
- x. Collaboration
 1. There are none. Program already has bilingual staff

c. Asset Management and Compliance

- i. Bilingual staff
 1. Asset Management and Compliance utilizes bilingual staff.
- ii. Vendor services
 1. Asset Management and Compliance utilizes HCD's vendor services.
- iii. Written translation
 1. Asset Management and Compliance utilizes written translation services.
- iv. ASL
 1. Asset Management and Compliance does not utilize ASL interpretation services.
- v. Notices/Taglines
 1. We do not. Language services are provided by bilingual staff within the Asset Management and Compliance program if needed
- vi. Training
 1. Staff are required to go to annual Diversity Equity and Inclusion (DEI) Training provided by the DEI unit, under the Office of Organizational Development. Newly hired bilingual staff are trained by current bilingual staff and the manager of the Homeowner Team.
- vii. Established grievance process
 1. Utilize the DEI Unit inbox (DEI@hcd.ca.gov)
- viii. Monitor response to complaints
 1. Services are provided by the three bilinguals of a staff of five. All communication goes through the five staff and they meet every Monday to "pass down" workload issues, special customer requests or complaints, and requests for manager or training assistance.
- ix. Monitoring and updating four-factor analysis, including seeking input from beneficiaries receiving direct services
 1. Services are provided by the three bilinguals of a staff of five. All communication goes through the five staff and they meet every Monday to "pass down" workload issues,

special customer requests or complaints, and requests for manager or training assistance.

- x. Collaboration
 - 1. Staff have been provided information on how to reach out to the Interpreter Services contracted with HCD to help in translating languages other than Spanish. Bilingual staff also provide bilingual services to units available at Inside HCD if the need is for Spanish.

A. State Grants Management/Office of Migrant Services/Asset Management and Compliance (DSFA) LANGUAGE ASSISTANCE PLAN

As a result of the preceding Four-Factor Analysis, DSFA has developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons the programs serve, the process by which the programs will monitor and update the LAP.

DSFA understands that the actions its programs and staff are expected to take to meet its LEP obligations depend upon the results of the Four-Factor Analysis including the services, the service area, the resources the programs processes, and the costs of various language service options. However, DSFA is to take reasonable steps to ensure meaningful access to LEP persons. The meaningful access is based upon a reasonableness standard that is both flexible and fact dependent.

As a result of the preceding Four-Factor Analysis, DSFA programs have developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons DSFA serve, and the process by which DSFA will monitor and update the LAP.

- 1. The procedures DSFA will use to identify LEP persons with whom DSFA representatives have contact, the size of LEP populations, and the languages of LEP populations.**
 - a. State Grants Management**
 - i. Primarily to identify the request and language assistance that is needed. If in Spanish, will keep internal, should it be a different language which has been none at this time, will be escalated to resources and contacts from list of internal bilingual staff.
 - b. Office of Migrant Services**
 - i. Program services mostly LEP persons. Program has bilingual staff within OMS and onsite at the centers
 - c. Asset Management and Compliance**
 - i. Primarily to identify the request and language assistance that is needed. If in Spanish, will keep internal, should it be a different language which has been none at this time, staff will utilize the list of internal bilingual staff from SharePoint, or call to conference in the Interpreter Services on contract with HCD.

2. Points and types of contact DSFA may have with LEP persons.

a. State Grants Management

- i. Points of Contact: Beneficiaries of the Joe Serna Farm Worker Housing Grant program recipients.
- ii. Types of Contact: mail, email, and phone.

b. Office of Migrant Services

- i. Points of Contact: Users of the state-owned Migrant Centers.
- ii. Types of Contact:
 1. Phone
 2. In person, occasionally
 3. Written

c. Asset Management and Compliance

- i. Points of Contact: Direct beneficiaries and borrowers of the programs listed in at the top of this document, under "Purpose". Approximately 1,029 currently active borrowers.
- ii. Types of Contact: mail, email, and phone.

3. Ways in which language assistance will be provided by DSFA, and the plan for outreach to LEP populations.

a. State Grants Management

- i. Two representatives are currently hired to service the LEP population. These two representatives are certified bilingual in Spanish. Therefore, they are able to provide oral interpretation services.
- ii. Outreach Plan is for information regarding bilingual staff availability to be included in all correspondence to Serna Farmworker households and to be posted on the SGM webpage.

b. Office of Migrant Services

- i. Program already has bilingual staff to assist LEP population
- ii. Outreach Plan is for information regarding bilingual staff availability to be included in all correspondence to workers and residents of Migrant Housing Centers, and to be posted on the OMS webpage.

c. Asset Management and Compliance

- i. We offer a toll-free public phone number (866-999-3913) that has a message to choose "1" for English and "2" for Spanish speakers. AMC has five HCD Rep-II's (three are bilingual Spanish/English) to cover in-coming calls.

- ii. We have an email box (Homeownerloan@hcd.ca.gov) from which we can accept requested documents and customer service requests.
- iii. We send out a January loan balance letter **annually**, with an Annual Verification (AV) questionnaire that we ask all borrowers to complete, sign and send back to HCD. The January loan balance letter and AV are sent out to all borrowers in both Spanish and English.
 - 1. Outreach Plan for AMC includes noticing within the January Letter that bilingual services are available via the Homeowners Phone Line, as well as similar information will be posted on the AMC webpage as the AMC webpage gets updated during 2022 (see #6C below).
- iv. As new loans are closed and loan files are transferred from Loan Closing Branch to AMC, they get added to our database and annual mailing list.

4. DSFA plan for training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring sub-recipients.

a. State Grants Management

- i. The Diversity, Equity, and Inclusion (DEI) Unit offers training for HCD. All department employees are trained in their obligation to provide language services.

b. Office of Migrant Services

- i. The Diversity, Equity, and Inclusion (DEI) Unit offers training for HCD. All department employees are trained in their obligation to provide language services.

c. Asset Management and Compliance

- i. Staff are required to go to annual Language Access Responsibilities Training provided by the DEI unit, under the Office of Organizational Development.
- ii. Newly hired bilingual staff are trained by current bilingual staff, with expectations set by the manager of the Homeowner Team.

5. A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.

a. State Grants Management

- i. None

b. Office of Migrant Services

- i. All vital documents are already translated and are as follows -

1. Residential dwelling lease agreements for migrant housing
2. Health and Safety Related Notices i.e., Social Distancing Protocols, flyers.
3. Notices related to non-seasonal migrant housing operations i.e., extension requests, eligibility for extensions, etc.
4. Stakeholder meeting agendas, presentations, etc.
5. Resident handbooks
6. Correspondence from residents and/or the public

c. Asset Management and Compliance

- i. Vital documents listed in #1, #2, and #3 are already translated and are as follows -
 1. January Letter, with balance statement
 2. Annual Verification form
 3. Follow-up letters customized to ask for specific requirements that were not fulfilled by the borrower's first response.
 4. The follow-up template letter to borrowers asking for a new mailing address or other contact information because we have received return-to-sender mail or no response for two consecutive years needs to be translated in Spanish, and perhaps have a tagline added. Time for this to be done – tentatively by Dec 31, 2022.

6. DSFA plan for translating informational materials that detail services and activities provided to Beneficiaries and Grantee's plan for providing appropriately translated notices to LEP persons.

a. State Grants Management

- i. Utilize interpreter vendor services when requested.

b. Office of Migrant Services

- i. Documents are already translated

c. Asset Management and Compliance

- i. Customized documents that are sent directly to individual borrowers are already translated.
- ii. The HCD website has never created a webpage on the Department website devoted solely to the homeowner loan and grant programs that communicate directly with beneficiaries. This could be another component of communication and Outreach Plan and lead to improved response rates from our AV. As the AMC webpage is

updated during 2022, this recommendation will be requested from the IT Division and the Communications Unit.

- iii. There are currently no pamphlets or marketing brochures used in long-term monitoring or existing loans and grants.

7. DSFA plan for providing interpreters for large, medium, small and one-on-one meetings.

a. State Grants Management

- i. Utilize interpreter vendor services when requested.

b. Office of Migrant Services

- i. The Office of Migrant Services already has bilingual staff that provide language services.

c. Asset Management and Compliance

- i. There never has been a need to develop a plan for face-to-face meetings for either groups or individuals, regardless of language used by the borrower(s). In-person meetings were never considered ideal, even before COVID-19 restrictions began - because the majority of our borrowers live more than 100 – 200 miles away from Sacramento, where the Homeowner Team is located.

8. DSFA plan for developing community resources, partnerships, and other relationships to help with the provision of language services.

a. State Grants Management

- i. no current plan

b. Office of Migrant Services

- i. There is no plan

c. Asset Management and Compliance

- i. No need for a plan at this time in long-term monitoring.

9. DSFA plan for monitoring and updating the LAP.

a. State Grants Management

- i. No current plan

b. Office of Migrant Services

- i. There is no plan

c. Asset Management Compliance

- i. AMC will rely on the leadership and advice of the DEI unit to update the LAP.

COMPLAINTS

If you believe that you have been denied the benefits of this Language Assistance Plan, you may file a written complaint by emailing the Diversity, Equity, and Inclusion Unit at DEI@hcd.ca.gov.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

Office of Fair Housing and Equal Opportunity
U. S. Department of Housing and Urban Development
400 State Avenue
Kansas City, Kansas 66101-2406