



SAN DIEGO  
HOUSING  
COMMISSION

# San Diego Housing Commission Language Access Plan

Improving Access to Services for Persons  
with Limited English Proficiency

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## Language Access Plan

### A. Introduction

On August 11, 2000, President Clinton signed Executive Order 13166, “Improving Access to Services by Persons with Limited English Proficiency.” The Order requires that agencies and organizations take steps to ensure that federally-funded activities, services and programs are accessible to all persons who, as a result of national origin, are not proficient or are limited in their ability to communicate in the English language. “Limited English Proficient” or “LEP” persons are those individuals whose proficiency in speaking, writing or understanding the English language is such that it would limit or deny their access to various programs and services if language assistance was not provided.

In 2003, the Department of Housing and Urban Development (HUD) issued guidelines that were finalized on January 22, 2007. These guidelines apply to any recipient of HUD assistance including but not limited to public housing agencies and assisted housing providers. Under the 2007 HUD Guidelines, recipients are required to make all of their programs accessible to LEP persons.

### B. Plan Statement

The San Diego Housing Commission (SDHC) is committed to its mission of providing quality service and empowerment to all individuals and families in need by providing them with the resources and housing opportunities to achieve an enhanced quality of life. This Language Access Plan (LAP) was adopted by SDHC to ensure accessibility to persons with LEP by providing services and programs adapted to their language needs.

### C. San Diego Housing Commission Policy

It is the policy of SDHC to ensure that persons with LEP shall not be discriminated against nor denied meaningful access to, and/or participation in, any of SDHC’s programs and activities. By identifying the language needs of its clients and utilizing available bilingual resources to address those needs, SDHC staff will ensure that LEP persons have the necessary meaningful access to all available SDHC services.

In accordance with federal and state guidelines, SDHC will make reasonable efforts to provide or arrange for free language assistance for LEP persons, including applicants, recipients and other persons eligible for activities and programs funded by the U.S. Department of Housing and Urban Development.

At SDHC all employees are responsible for ensuring that the public is treated with dignity and respect. SDHC’s LAP applies to all programs, services, activities and facilities of SDHC, regardless of receipt of Federal financial support. The LAP concentrates on improving access to SDHC resources, with a focus on those areas with regular and frequent contact with LEP persons.

### D. Definitions

#### **Bilingual**

The ability to fluently speak, read, transcribe, and communicate accurately in two languages.



### **Interpretation**

The action of communicating in one language and orally translating it into another language without losing its meaning. Interpreting is a sophisticated skill that requires training and practicing, and should not be confused with simple bilingualism.

### **Language Access Plan (LAP)**

Defines and outlines the actions to be taken by SDHC to ensure meaningful access to its services, programs and activities for LEP persons.

### **Language Assistance Services**

Interpretation services and/or translation services provided by bilingual personnel or language assistance vendors to LEP persons, to ensure their ability to communicate effectively with SDHC staff.

### **Limited English Proficient (LEP)**

Persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English.

### **Primary Language**

The language in which an LEP person chooses to communicate with others.

### **Translation**

The replacement of written text from one language into an equivalent written text in another language. Translation may also occur through oral explanation of documents.

### **Vital Documents**

A document, paper or electronic, that contains information that is critical for accessing SDHC's services and benefits; letters or notices that require a response from the client and documents that inform clients of free language assistance.

## **E. Meaningful Access**

In accordance with Executive Order 13166 and the 2007 HUD Guidelines, SDHC will make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to SDHC's programs and activities. Meaningful access refers to the ability to participate in and benefit from any federally assisted programs in a manner no different than that of others, whose national origin is not at issue (i.e. English speakers), who could participate and benefit from such programs. To determine its obligation to provide meaningful access, SDHC is required to 1) conduct a four-factor assessment, 2) develop a LAP, and 3) provide appropriate language assistance.

Through the four-factor analysis below, SDHC has conducted a self-assessment of its progress in providing language assistance to LEP persons.

The four-factor analysis is designed to assist in a balanced assessment of the following four factors:

- **LEP Population** – The number or proportion of LEP persons eligible to be served or likely to be encountered.



- **Frequency of Contact** – The frequency with which LEP persons come in contact with the programs and/or activities.
- **Importance** – The nature and importance of the program, activity, or service to people’s lives.
- **Resources** – The associated costs and available resources.

**1. LEP Population**

The determination to provide language assistance services includes an assessment of the number or proportion of LEP persons from a particular language group living in the City of San Diego, the eligible service population. The greater the number or proportion of LEP persons in the service area, the more likely language services are needed.

According to estimates by the U.S. Census Bureau’s 2014 American Community Survey (ACS), English is the only language spoken at home by an estimated 60 percent (770,024) of the total population (1,295,214) in the City of San Diego. The remaining 40 percent speaks a language other than English. Of those who speak languages other than English at home, the ACS estimates that 15 percent (197,496) speak English “less than very well.” Of the languages spoken by this 15 percent of the population, there are 12 that are spoken by 5% or 1,000 persons of the total population, as indicated in the table below.

Language Spoken at Home and Ability to Speak English		
Languages spoken by populations who speak English less than “very well”	Estimate	Percent of Total Population
Spanish	106,643	8.23%
Tagalog	19,749	1.52%
Vietnamese	16,733	1.29%
Chinese	15,775	1.22%
Korean	5,937	0.46%
Persian	5,042	0.39%
Arabic	3,375	0.26%
Laotian	2,969	0.23%
Russian	2,809	0.22%
Japanese	2,269	0.18%
Thai	1,338	0.10%
Portuguese	1,306	0.10%

Source: U.S. CENSUS BUREAU, 2014 AMERICAN COMMUNITY SURVEY 1-YEAR RESULTS TABLE B16002

**2. Frequency of Contact**

SDHC assessed the frequency at which staff has or could possibly have contact with LEP persons. The Rental Assistance Division (RAD) is the most frequented unit providing services at SDHC. RAD assists in the administration of the Housing Choice Voucher program. Data from RAD for the Housing Choice Voucher Program is set forth herein to illustrate frequency of contact of LEP persons with SDHC.



Data from RAD was gathered to analyze the frequency of oral interpretation services provided through RAD’s current language assistance provider, CTS LanguageLink, and written translation services for Vital Documents. While a significant percentage of the San Diego population speaks English “less than very well,” the frequency of contact with LEP persons who speak languages other than Spanish is limited. The 2015 Four-Factor Analysis shows that the total contact with LEP persons, other than Spanish speakers, is less than 1% of the Housing Choice Voucher program population as detailed in the table below. The table shows SDHC’s records of language assistance services to LEP persons using over-the-phone interpretation services from July 1, 2015 to June 30, 2016. SDHC responded to a total of 381 requests for over the phone language assistance. The majority of the requests received were for assistance in Spanish. The second most prevalent language group assisted was Vietnamese.

<b>Over-the-phone interpretation Services July 1, 2015 to June 30, 2016</b>		
<b>Language</b>	<b># of Calls</b>	<b>Percentage</b>
Albanian	1	0.26%
Amharic	1	0.26%
Arabic	4	1.05%
Cambodian	1	0.26%
Cantonese	3	0.79%
Chinese	1	0.26%
Farsi	2	0.52%
Laotian	3	0.79%
Nuer	1	0.26%
Oromo	2	0.52%
Russian	6	1.57%
Somali	24	6.30%
<b>Spanish</b>	<b>246</b>	<b>64.57%</b>
Tagalog	4	1.05%
Tigrinya	1	0.26%
<b>Vietnamese</b>	<b>81</b>	<b>21.26%</b>
<b>Total</b>	<b>381</b>	<b>100.00%</b>

*Source: Rental Assistance Division*

SDHC also reviewed requests for written translation. The 1,528 requests for written translation received from July 1, 2015 to June 30, 2016, shown in the following table, were served by bilingual staff members from RAD. As with over the phone interpretation services, the majority of the requests for language assistance were for Spanish and Vietnamese.



Language Assistance Requests Served by RAD Department Staff		
<u>Language</u>	<u>Number of Requests</u>	<u>Percentage</u>
Arabic/Dinka	1	0%
Laotian	0	0%
<b>Spanish</b>	<b>1,431</b>	<b>93.65%</b>
Tagalog	0	0%
<b>Vietnamese</b>	<b>97</b>	<b>6.35%</b>
<b>Total</b>	<b>1,528</b>	<b>100%</b>

*Source: Rental Assistance Division*

Given that the frequency of contact for both oral interpretation and written translation requests reflect that Spanish and Vietnamese assistance is most requested, SDHC will provide written translation of Vital Documents in both Spanish and Vietnamese under this LAP. SDHC will make every effort to provide oral interpretation for all of the remaining ten languages set forth in Factor 1. Further, SDHC will make every effort to attempt additional outreach for those language minority populations that are eligible for SDHC programs, but are underserved due to existing language barriers.

### 3. Importance

SDHC’s programs and services are crucial to many people’s lives. The Housing Choice Voucher Program, which is administered by SDHC, is an essential and important program for the thousands of individuals served annually by SDHC. As shown previously in the “frequency of contact” factor, RAD staff interacts with a significant number of the LEP population served by SDHC. An LEP person’s inability to benefit from such programs may adversely affect their access to fair housing.

### 4. Resources

SDHC is continuously assessing its available resources that can be used to provide language assistance. This includes hiring bilingual staff, reviewing existing contracts for professional translation services, determining which documents should be translated, and deciding what level of training is needed for SDHC staff.

## F. Language Assistance Measures

After the four factor analysis above, SDHC developed the measures described below to provide language assistance to LEP persons. SDHC will make an effort to serve the LEP community with oral interpretation and written translation services for the Housing Choice Voucher Programs, Real Estate Programs, Homeless Housing Innovations Programs, and Achievement Academy programs, as much as possible.



## 1. Written Translation

SDHC will provide written translations of Vital Documents to assist with access to its housing programs by LEP persons. Providing written translation for the anticipated vital documents in the top 12 non-English languages, identified in Factor 1 of the 2015 Four-Factor Analysis, would roughly cost \$47,000. Since Factor 2 revealed that the frequency of contact with LEP individuals who speak languages other than Spanish or Vietnamese is limited, translating vital document into all 12 non-English languages would be an inefficient way to utilize limited funds. Therefore, written translations will be provided in Spanish and Vietnamese based on the frequency these LEP persons contact the Housing Commission. The Vital Documents List is attached hereto as “Exhibit A” and made part hereof. Within a year of the implementation of this LAP, SDHC will begin collecting information from new assisted families regarding languages spoken at home. Based on this data collection, SDHC will assess the need to include additional languages to its Vital Documents List.

SDHC will also make every effort to provide effective oral interpretation of Vital Documents and non-Vital Documents where a written translation is not available.

As opportunities arise, SDHC may also collaborate with other PHAs to share the costs of translating common documents, which may include language groups that do not yet reach the threshold level in SDHC’s client population.

SDHC will also consider technological aids such as internet-based translation services, which may provide helpful, beneficial translations of written materials.

## 2. Oral Interpretation

SDHC staff will take reasonable steps to provide meaningful access to LEP persons who have difficulty communicating in English.

Where reasonable, oral interpretation will be available for the following compulsory activities, if requested by LEP persons prior to their appointment:

- Intake and interview process
- Voucher briefing
- Participant hearings
- Biannual and interim re-examinations
- Housing Quality Standards Inspections

### a. Competent Bilingual Staff

SDHC currently employs bilingual staff. When possible, available bilingual staff members will assist LEP persons by providing translation in several languages, including Spanish, Vietnamese, Tagalog, Laotian, Arabic, and Dinka. SDHC bilingual employees who provide language services are designated either as “technical” or “non-technical,” depending on the level of skills of the employee. Employees designated as technical may conduct oral and written interpretation and translation of “technical” programmatic information such as federal, state or local program regulations, policies, procedures, forms and documents, as well as “non-technical” translations. Employees designated as “non-technical” may conduct oral and written interpretation and translation of routine information provided in basic letters, general flyers, or bulletins. The “Bilingual Employee List” is available on file with SDHC.





### b. CTS Language Link Services

SDHC will also have available interpretive services provided by CTS Language Link. The over-the-phone interpretation services support more than 240 languages and dialects. All of SDHC's current intake and reception employees have been given "I Speak" cards, provided by CTS Language Link, to allow LEP individuals to identify the language in which they need assistance. At that point, the employee assisting the LEP person will dial the CTS Language Link telephone number and request translation in the language identified by the LEP individual. All current intake and reception staff have also been provided instructions on how to use CTS Language Link's Interactive Voice Response. The instructions are included as "Exhibit B" as attached to this LAP.

**NOTE:** LEP persons are also allowed to use interpreters of their own choice. In order to increase the potential for accuracy during interpretation and minimize the withholding of confidential information that may affect participants' rights, program participants are discouraged from using minors as interpreters.

### c. Expand Accessibility Services

SDHC will expand language assistance services to other programs of great importance to the population being served and those seeking assistance from such programs. The programs include Public Housing, administered by the Real Estate Division, and Homeless Initiatives.

## J. Notice of Free Language Assistance Services

SDHC will distribute information regarding the availability of its free language access services. SDHC shall:

- Post signs in all areas accessible by visitors and program participants,
- Include notices of free Language Assistance Services on the SDHC website, brochures, community notices, and public notices,
- Include bilingual options on the automated phone system,
- Make "I Speak" cards available for LEP persons to self-identify at SDHC's headquarters, and
- Make this LAP available on at [www.sdhc.org](http://www.sdhc.org), SDHC's website.

## K. Staff Training

SDHC will provide access to an electronic copy of this LAP to all staff, and will provide training as deemed necessary. The staff trainings will include the types of services available to LEP individuals, as outlined in the LAP. New employees will also receive an electronic copy of the LAP and a brief, introductory fact sheet on how to assist LEP individuals as part of their orientation.

Staff trainings will include:

- An in-depth discussion of the plan.
- How to respond to LEP callers.
- How to respond to LEP persons in-person.



- How to respond to written communications from LEP persons.
- How to utilize the CTS Language Link services.
- How to use the “I Speak” cards.
- Which staff and outside vendors are available for interpretation at appointments.
- The location of translated documents.

### **L. Implementation & Monitoring**

All SDHC employees are responsible for ensuring LEP persons are provided adequate access to SDHC information, programs and services. All SDHC staff is responsible for ensuring that all LEP individuals are treated with respect when requesting language assistance. The Compliance and Special Programs Department is responsible for the oversight, performance, and implementation of the LAP. The Compliance and Special Programs Department is also responsible for investigating any and all complaints brought forth by LEP persons.

The Compliance and Special Programs Department will review and revise the LAP on a biennial basis to ensure that SDHC is providing meaningful access to LEP clients. The review will include:

1. An assessment to identify the breakdown of the City of San Diego’s population that speaks English “not well” or “not at all,” which triggers consideration of language assistance services, as described previously.
2. A report from the Rental Assistance, Real Estate, and Homeless Housing Initiatives Divisions on the number of clients who are LEP.
3. An analysis of staff requests for contract interpreters, including the number of requests, languages requested, costs, and other factors related to language access.



Exhibit A

**Vital Documents List**

Intake Packet
Appointment Checklist
Authorization for the Release of Information (HUD 9886)
Citizen Declaration Eligibility
Citizenship Declaration
Conviction Record
Criminal History Checks
Debts to PHAs (HUD 52675)
EIV Brochure
Evidence of Immigration Status
Guidelines
MTW Authorization
Personal Declaration
Veteran/Military Priority
Supplemental Contact (HUD 92006)
NIA
Fair Hearing - Manual
Follow-Up Letter
NIA- Deceased Participant
NIA- Decreased Voucher Size: Live-In Aide
NIA- Decrease Voucher Size: Medical Equipment
NIA- Request Admin Review- Deceased Participant
NIA- Request Admin Review- Voucher Expiration
NIA- Request Admin Review- Voucher Size
NIA- Right to Request An Administrative Hearing
NIA- Withdrawal
NIA- Zero HAP
NOI
NOI- 5 Day
NOI- 10 Day
NOI- General
Recertification Packet
Address Cover Page
Authorization for the Release of Information (HUD 9886)
MTW Policy Changes
Notice of Rights and Responsibilities
Personal Declaration
RAD Letter
Release of Information



Exhibit B



**How to Use Interactive Voice Response (IVR)**

- Step 1:** Call 1 (800) 535-7749
- Step 2:** Enter Account Number \_\_\_\_\_, followed by # sign
- Step 3:** Select 1 to be connected directly to your Spanish interpreter, or Select 9 for all other languages
- \*If you require a 3<sup>rd</sup> party call, press 9 to reach a Customer Service Representative
- Step 4:** Enter Worker ID followed by # sign

**IVR FAQs:**

**What if I do not know my Account number?**

You do need this information in order to reach the interpreter directly. If you are unsure of your account number, wait and the system will direct you to a live operator who will look up your account.

**What if I do not know my Employee/ Worker ID number?**

This is your two-digit worker ID number.

**What is IVR?**

IVR stands for Interactive Voice Response. CTS LanguageLink's IVR system allows a customer to quickly select the language desired for interpretation and be connected immediately to an interpreter without interaction with a live attendant. The benefit of this is an even faster connect time to your interpreter and better service to your limited English proficient (LEP) client.

**What is a third party call?**

A third party call is when you need CTS LanguageLink to call the LEP client and then bridge the call together with you and the interpreter.

**How do I make a third party call with CTS LanguageLink?**

If you need a third party call, **press 9 (even for Spanish)** to reach a Customer Service Representative (CSR) and let the operator know you need a third party call. We are happy to assist you with this at no additional charge. Our **interpreters are not able to make the third party call** directly.

**I need a Hindi interpreter. How do I get a Hindi interpreter on the line?**

**Press 9** for other languages and let the CSR know that you need a Hindi interpreter and they will connect you.