



YOLO COUNTY HOUSING

Language Assistance Plan (LAP)
for Limited English Proficiency (LEP) Persons

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Adopted by the YCH Board of Commissioners: December 18, 2009
Revision: February 18, 2010
Revision: December 16, 2020

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I. Purpose and Legal Basis

The purpose of this plan is to ensure that people who do not speak English proficiently receive the language assistance necessary to allow them meaningful access to Yolo County Housing (YCH) programs, services and information.

YCH shall identify potential Limited English Proficiency (LEP) persons, notify them that translation and interpretation services are available at no cost, and provide the needed language assistance. YCH shall also take into account HUD's four factor analysis (i.e., balancing clients' needs while not incurring excessive burden on YCH resources). At no time shall any YCH employee or contractor indicate that any LEP applicant or client might be charged for interpreter or translation services.

This plan implements the Title VI language access responsibilities of human services providers receiving federal financial assistance from the U.S. Department of Health and Human Services. This plan serves to meet the legal obligation of language access requirements in compliance of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.; 45 CFR 80 and in accordance with the office for Civil Rights policy Guidance, 65 Fed. Reg. 52762 (2000).

The plan is based on the Department of Housing and Urban Development's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (2007).

II. Definitions

Limited English Proficiency (LEP) person: A person who does not speak English as his/her primary language and who has a limited ability to read, write, speak or understand English. Such persons may be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit or encounter.

Vital document: Any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include but are not limited to applications, consent forms, notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services.

Interpretation: The act of listening to one language and orally converting it into another language. Interpreting is a sophisticated skill that requires training beyond simply being bilingual. An interpreter needs to show proficient knowledge of both the source and target language, but he or she does not necessarily need to be formally certified. YCH shall not assume interpreters who can translate orally can also translate written text.

Translation: The replacement of a written text from one language into an equivalent written text in another language. Because LEP persons may not be able to read their native languages, back-up availability of oral interpretation needs to also be considered.

III. Identifying LEP Persons Who Need Language Assistance

YCH shall strive to use the most current data available in tailoring its services to meet the needs of its LEP constituents. To discern the language assistance needs of its general eligible population, YCH will use a variety of data sources. To discern the needs of individual clients, it will rely on client self-identification and staff interactions.

YCH shall use the following procedure to determine the number of LEP persons currently using Yolo County Housing services and the number of LEP persons in the jurisdiction who may be eligible to receive services.

1. YCH data. The languages and degree of proficiency previously encountered by staff shall be tabulated and analyzed (Appendix A)
2. Client data. Clients can self-report their respective language using “I Speak” cards. The number and variety of languages will be considered in the final assessment. The most common languages will also be part of a simple, laminated flip book posted at YCH offices so clients can point to their language and identify themselves faster.
3. Federal Data. The latest Census Department language demographics for Yolo County shall be analyzed. (Appendix B) YCH will use the most recent updated data available.
4. State and local data. Data from government and community-based organizations shall also be analyzed. This includes discussions with county and non-profit agencies such as the Department of Health and Human Services Agency. YCH shall also incorporate data from Yolo County School Districts. (Appendix C)

IV. Language Assistance Plan: Determining the Type of Language Service Needed

YCH shall use HUD’s four factor analysis to decide the type and scope of language assistance services it provides:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by YCH.
2. The frequency with which LEP persons come in contact with YCH.
3. The nature and importance of the program, activity, or service provided by YCH to people’s lives.
4. The resources available to YCH and costs.

These four factors shall be used to address individual client's needs as well as to craft policy for the entire YCH service area. Although the conclusions of this analysis may change, the underlying goal behind them is constant: to ensure LEP persons have meaningful access to critical services while not imposing undue financial burdens on YCH.

YCH shall take extra steps to provide written translations for specific LEP populations that represent a significant portion of its clientele. YCH shall use the following HUD criteria in conjunction with the four-factor analysis to comply with its written-translation obligations:

- A. YCH shall offer written translations of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or
- B. If there are fewer than 50 persons in a language group that reaches the five percent trigger in subparagraph A, YCH shall not translate vital written materials but instead provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Conclusions about the YCH Language Demographic for 2020

After analyzing Yolo County's language demographics and the current LEP populations being served through YCH's public housing programs, it has been determined that YCH shall translate vital documents into Spanish and Russian.

As outlined in Appendix A (current LEP participants in the public housing and housing choice voucher program) and Appendix B (updated ACS data), Yolo County's LEP Spanish-speaking and Russian-speaking populations meet the 5% criteria.

Additional interpretation or translation services for these two languages—as well as for other LEP populations identified in the data analysis (i.e. Chinese-speaking identified in Appendix B)—will be handled on an individual basis using the four factor analysis and the implementation plan below.

V. Language Assistance Plan: Implementation of LEP services

YCH shall offer the opportunity for meaningful access to all LEP clients. If a client asks for language assistance, or if staff identifies a client who needs assistance, YCH shall make reasonable efforts to provide free language assistance.

The following options shall be considered when providing language services:

- Bilingual staff or in-house interpreters. Bilingual staff shall be identified and their effectiveness monitored through client satisfaction surveys. A list of such people shall be compiled and accessible to all staff members.
- Family members or friends. Staff shall never require or encourage a LEP client to use family members or friends as interpreters; however, YCH will also not deter clients if they prefer to use a friend or family member.
- Contracted interpreters/translators. YCH shall develop and maintain an index of interpreters and translators for staff to use when language services are required for LEP persons.
- Community organizations and volunteers. Volunteers who understand this Plan, the ethics of translation, and can interpret or translate to the client's satisfaction. YCH shall also have an index of community volunteers.
- Telephone interpreter services. YCH has implemented a telephone interpreter service in the main office and all public housing sites. This service will be used when bilingual staff and in-house interpreters are unavailable.

At no time shall children under the age of 18-years-old be used to interpret or translate.

Documenting the LAP implementation

The responsibility of documenting adherence to these procedures lies with the YCH staff member working closest with the client. Nevertheless, all staff members who work with clients, especially those who act as first points of contact, shall identify and address language needs of members of LEP populations in a timely manner. The General Director, or their designee shall oversee the implementation of this Plan as a whole.

VI. Language Assistance Plan: Ensuring the quality of language services

YCH shall make every reasonable effort to ensure that the language services it provides are of high quality and that the competency of the interpreters and translators is appropriate to the situation.

Bilingual staff and in-house interpreters will be third-party certified in speaking and/or reading and writing. They will receive YCH's LAP staff training, be familiar with this Plan, and understand the ethics of interpretation.

When using contracted interpreters or translators, YCH shall use contractual language to ensure that outside vendors are bound by the legal requirements of the YCH policies. All contracted services are required to demonstrate that the interpreters they employ receive training in the ethics and competency standards of interpreting. Agencies shall be required to ensure that their interpreters have been tested on their fluency in both English and the non-English language. YCH will make visits to these agencies and review their training and testing methods on an as-needed basis.

Because there are at least 42 different languages spoken by LEP persons in Yolo County, it is impossible for the YCH staff to corroborate the accuracy of every interpretation. Therefore, YCH shall use client satisfaction surveys on a sampling of customers to determine if the interpretation services it offers are sufficient (Appendix E). Surveys will be returned to the General Director if a client was satisfied with the thoroughness of the interpretation or translation he or she received, then the type and quality of that service shall suffice. This procedure shall be used for both in-house and contracted services.

YCH will work to increase current LEP Resources including translation of identified vital documents into Spanish and Russian as identified in Appendix D. Translation of the following priority documents are either completed or in progress. These priority documents will be translated by fiscal year end 2021.

- YCH Language Assistance Plan
- YCH Reasonable Accommodation Policy and Forms
- Housing Choice Voucher Briefing Documents Packet
- Project Based Voucher Briefing Documents Packet
- Request for Tenancy Approval (RFTA) Documents Packet
- Public Housing Lease
- VAWA Notice and Forms
- HQS Inspection Notices
- Wait List Opening Announcements

Additional identified vital documents that have been translated or are in process to be translated into Spanish and/or Russian are identified in Appendix D. YCH documents are added, revised and deleted throughout the year. This list will be reviewed regularly as additional vital documents are identified; they will be translated into Spanish and/or Russian. All documents' classifications shall be reviewed at least once a year.

VII. Language Assistance Plan: Staff Training

YCH shall train its staff about its LAP plan and policies. They will know how to implement the procedures, such as:

- How to respond to LEP callers or written communications from LEP clients
- How to assess what language assistance is needed and use the "I Speak" cards
- How to access outside language line service
- The type and location of translated documents
- Which staff speak other languages and are available for interpretation at appointments
- What outside vendors are available for interpretation

Bilingual staff shall also be trained to understand the ethics of translation, such as how to adhere to their role of interpreter without deviating into a counselor, legal advisor or other role.

VIII. Language Assistance Plan: Notification to LEP persons

YCH shall make a reasonable effort to try and alert all LEP persons that they may receive free language assistance. Examples of these efforts are:

- Posting a language identification guide (i.e. “I Speak Card or Sign) in common areas of public housing buildings and in the YCH office lobby near YCH staff. This will allow applicants and residents to point to their preferred language and allow YCH staff to include an interpreter for that language in the conversation.
- Stating in outreach materials, brochures, web page and other documents that language services are available free of charge.
- Printing at the bottom of critical documents a brief tag that says “If you need this document translated, contact YCH” in Spanish and Russian.
- Include a flier with the main voucher and housing applications that alerts clients to YCH no cost language services.
- Employing a telephone voice mail menu that clients can access 24/7.
- Posting waitlist information online and in the YCH lobby in English, Spanish and Russian.
- Incorporating translation capabilities and post translated documents in Spanish and Russian as part of the YCH webpage redesign in 2021.
- Working with grassroots and faith-based community organizations that might interact with LEP persons to alert those persons that they can attain free interpretation or translation of their YCH documents.
- Upon request, YCH will provide one-on-one HCV briefings in other languages using certified interpreters or the language line. In addition, YCH will explore the use of recorded HCV briefings in Spanish and Russian.

IX. Monitoring and Updating the Language Assistance Plan

YCH will routinely monitor this Plan’s effectiveness. The YCH General Director shall coordinate this assessment and review data collected. An overall analysis of YCH plans and policies shall be conducted annually. This evaluation shall include, among other elements:

- Reclassification of vital and non-vital documents
- Demographic changes in Yolo County
- Feedback from staff about their implementation and understanding of LAP policies
- Feedback from clients about their satisfaction with YCH language assistance
- Feedback from Community Based Organizations on LEP/LAP process and assistance.

The customer feedback forms will be returned to the YCH General Director who will evaluate and follow up as needed. YCH staff will provide an annual report to the Board of Commissioners on the effectiveness of the Language Assistance Plan as needed.

Appendix A

Tabulated Percentages of LEP Populations Served in Public Housing and Housing Choice Voucher Programs as of November 2020

Language in Housing Choice Voucher Program	Percent of Total Households
English	79.79%
Spanish	5.96%
Russian	11.23%
All Other	3.02%
Language in Public Housing Portfolio	Percent of Total Households
English	71%
Spanish	24.59%
Russian	3.02%
Other	1.39%

Appendix B

United States Census Bureau 2018 ACS 5-Year Estimates Data Profile

This table examines recent language demographic for Yolo County and estimates the total number of individuals of languages spoken in the home within the jurisdiction for a total estimated population age 5 years or older of 202,510.

Languages Spoken at Home	Estimate Total	Estimate %
English Only	125,841	62.1%
Spanish	44,675	22.1%
<i>Speak English less than "very well"</i>	26,851	13.3%
Indo-European Languages	15,031	7.4%
<i>Speak English less than "very well"</i>	5,433	2.7%
Asian and Pacific Islander Languages	15,823	7.8%
<i>Speak English less than "very well"</i>	6,415	3.2%
Other Languages	1,140	0.6%
<i>Speak English less than "very well"</i>	268	0.1%

Yolo County Community Indicator Dashboard - Demographics

This data has been gathered from the United States Census Bureau, county and state reports, and various non-profits and is posted on the Yolo County website at:

<https://www.yolocounty.org/residents/community-indicator-dashboard>

Identified Language Spoken in Yolo County	% Value 2015	% Value 2016	% Value 2017
English	63.5%	62.6%	62.3%
Spanish	21.3%	21.8%	22.2%
Indo-European Speakers	6.6%	6.9%	7.3%
Asian	8.0%	8.1%	7.7%

Appendix C

Estimating LEP and School District EL Speakers for Yolo County

Background

HUD describes adults who cannot speak English adequately as having Limited English Proficiency (LEP). California K-12 students in the same condition are called English Learners (EL). This analysis attempts to calculate the number of Yolo County LEP residents by examining the number of Yolo County EL students.

Obviously, these are two different populations. Nevertheless, this analysis is not meant to be comprehensive nor exacting. It is only a cursory calculation, one created primarily to uncover any significant LEP populations that might have been missed from other data sources. It also acts as a rough barometer to see which LEP populations are close to the 1000-speaker mark or could potentially be in the near future (Figure 1).

The number 1,000 is significant. For YCH to be required to translate “vital documents” into a population’s non-English language, there needs to be at least 1,000 LEP speakers or a LEP group must represent 5% of the area’s eligible population, whichever is less. (Individual translations will still occur as needed, just not systematically.)

Conclusion

The Spanish EL population has a significant presence in Yolo County: there are and will continue to be more than 1,000 speakers. Thus, as suggested by other data sources as well, YCH vital documents need to be translated into Spanish. (See Figure 1.)

Neither of the next two biggest groups, Russian and Punjabi, will likely have more than 1,000 students in the next five years. Nevertheless, based on other data sources, more than 5% of its housing residents and voucher recipients are Russian LEP speakers; therefore, YCH will also translate vital documents into Russian.

Spanish and English are the only specific languages tabulated by the U.S. Census. (The others are grouped into language families). So this school district analysis is also useful in that it reveals the specific languages besides these two that are common in Yolo County: Russian, Punjabi, Mandarin, Korean and Hindi.

Figure 1: Current Number of EL Students in Yolo County K-12 School Districts

2019-2020 Student Population = 30,569

<https://www.ed-data.org/county/yolo/>

	2015-16	2016-17	2017-18	2018-19	2019-20
All Other	716	704	757	734	702
Farsi (Persian)					93
Korean	88	102	102	84	
Mandarin (Putonghua)	106	129	156	133	110
Punjabi	252	228	246	213	216
Russian	502	460	427	454	421
Spanish	4983	4721	4399	4242	3863
Total Languages of English Learners	6647	6344	6087	5860	5405

	2015-16	2016-17	2017-18	2018-19	2019-20
All Other	2.4	2.4	2.5	2.4	2.3
Farsi (Persian)					0.3
Korean	0.3	0.3	0.3	0.3	
Mandarin (Putonghua)	0.4	0.4	0.5	0.4	0.4
Punjabi	0.8	0.8	0.8	0.7	0.7
Russian	1.7	1.5	1.4	1.5	1.4
Spanish	16.8	15.8	14.6	14.1	12.6
Total Languages of English Learners	6647	6344	6087	5860	5405

Appendix D

Vital Documents List

YCH has identified following documents for translation into Spanish and/or Russian.

Housing Choice Voucher Program Priority One (Spanish and Russian)

- Wait List Application (on-line) – Complete
- Wait List Opening Notices – Complete and Ongoing
- Authorization for the Release of Information/Privacy Act Notice - Complete
- Consent to Release Income – Complete
- Contract for HCV Assistance – Complete
- Contract for HCV Assistance Lease Addendum – Complete
- Request for Tenancy Approval (RFTA) – Complete
- Debts Owed to Public Housing Agencies Form – Complete
- Notices Advising LEP Persons of Free Language Assistance – Complete
- Customer Service Surveys - Complete
- HCV Eligibility Packet – In Progress (2/2021)
- HCV Briefing Packet – In Progress (2/2021)
- HQS Inspection Notices – In Progress (2/2021)
- Language Assistance Plan – In Progress (2/2021)
- Reasonable Accommodation Policy – In Progress (3/2021)
- Reasonable Accommodation Request and Notification Forms - Complete
- VAWA Notice and Forms – In Progress (2/2021)
- Annual Re-Certification Forms – In Progress (6/2021)

Public Housing Program Priority One (Spanish)

- Wait List Application (on-line) – Complete
- Wait List Opening Notices – Complete and Ongoing
- YCH Occupancy Rules – Complete
- YCH Parking Policies – Complete
- Mold and Mildew Policies – Complete
- Pool and Barbeque Policies – Complete
- Customer Service Surveys - Complete
- Notices Advising LEP Persons of Free Language Assistance - Complete
- Public Housing Lease revised 11/20 – In Progress (1/2021)
- Public Housing Eligibility Packet – In Progress (3/2021)

Housing Choice Voucher Program and Public Housing Priority Two (Spanish and Russian)

- Hearing Notices – prior to sending all hearing notices are translated into the Head of Household (HOH) identified language
- Correspondence and/or notices sent to households will include a form notifying them of free language assistance services available.

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Appendix E

Yolo County Housing Translation Satisfaction Survey

This survey will take you less than 60 seconds to fill out. It helps us determine if the language assistance services we provide are meeting our clients' needs.

1. I am aware I can receive free interpretation or translation to help understand YCH documents, forms or interviews.

____ Yes ____ No

2. Answer questions 2-5 only if in the past year you have used an interpreter or translator to help you understand YCH documents or procedures.

- a) When you needed help, who translated?

____ Friend or family member

____ YCH staff (name): _____

____ Professional interpreter or translator (name): _____

____ Other (specify): _____

- b) For what language did you need translation: _____

3. I felt my interpreter spoke with a strong understanding of both my language and English.

1	2	3	4	5	NA
Highly Disagree	Disagree	Neutral	Agree	Highly Agree	

4. I felt my translator wrote with a strong understanding of both my language and English.

1	2	3	4	5	NA
Highly Disagree	Disagree	Neutral	Agree	Highly Agree	

5. I felt my interpreter/translator acted courteous and professional.

1	2	3	4	5	NA
Highly Disagree	Disagree	Neutral	Agree	Highly Agree	

Comments:

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