

2024-2029

Language Access Plan



Housing Authority
2160 41st Avenue
Capitola, CA 95010
831-454-5955
www.hacosanta.cruz.org

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I. Language Access Plan Overview

The Housing Authority of the County of Santa Cruz (Housing Authority) recognizes the rich diversity throughout our jurisdiction and is committed to achieving our mission to “advancing access to affordable housing and a thriving community free from discrimination by providing affordable housing and delivering inclusive services to our diverse community with compassion and kindness”.

The Housing Authority acknowledges the significance of language barriers faced by individuals with Limited English Proficiency (LEP) in accessing essential benefits or services provided by the Housing Authority. We recognize the importance of ensuring clear communication to facilitate understanding and the ability for everyone to exercise their rights, fulfill responsibilities, and comprehend pertinent information provided by our organization.

Language Access Plan Vision Statement

The Housing Authority shall provide meaningful access to equitable, timely, and quality language assistance services to individuals with limited English proficiency (LEP) in its programs and activities consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (EO 13166), Improving Access to Services for Persons with Limited English Proficiency, 65 Fed. Reg. 50, 121 (Aug. 16, 2000).

Policy Statement

It is the Housing Authority’s policy to provide timely, meaningful access for persons with LEP to all Housing Authority programs, services, and activities. Individuals who have a limited ability to read, speak, write, or understand English may be entitled to free language assistance with respect to a particular type of service, benefit, or encounter.

The Housing Authority will provide free language assistance services to persons with LEP whenever an individual with LEP requests language assistance services.

The Housing Authority’s Language Access Plan (LAP) will be publicly available on the Housing Authority website at <https://hacosantacruz.org/> or from the Housing Authority’s main office upon request.

The Housing Authority continuously seeks to improve and expand the services it provides to enable persons with LEP to communicate with the Housing Authority in person, over the telephone, in writing, or through electronic media.

The Housing Authority will re-evaluate the LAP as needed or at least every five years to maintain compliance with the requirements set forth in Executive 13166 and other LEP

related guidance, and to ensure that the LEP communities have continuous, meaningful access to Housing Authority programs, services, and activities.

Purpose and Authority

The purpose of this language policy and Language Access Plan (LAP) is to establish effective guidelines, in accordance with Title VI of the Civil Rights Act of 1964, Executive Order 13166 and PIH Notice 2024-04, for Housing Authority personnel to follow when providing services to, or interacting with persons with LEP to ensure all persons have meaningful access to Housing Authority administered programs and activities.

II. Plan Development and Implementation

The goal of language access planning and implementation is to ensure that the Housing Authority provides meaningful access to all Housing Authority activities, services, and programs to individuals with LEP and ensure effective communication at all points of contact between persons with LEP and the Housing Authority.

Implementation includes the dissemination and accessibility of the Language Agency Plan (LAP) to all personnel within the Housing Authority, and ensure it is available to applicants, assisted families, and the general public upon request. Further implementation of the LAP includes providing appropriate language assistance services to the LEP population the Housing Authority serves including oral interpretation, bilingual staff, written translation services, and notice of availability of LEP services.

III. Assessment: Needs Capacity – Four Factor Analysis

The Housing Authority regularly assesses whether the needs of current and potential program participants are met and works to identify the agency's capacity to meet these needs in accordance with the policies outlined in this plan. These self-assessments assist the Housing Authority in identifying language barriers that may delay effective oral and written communication between the Housing Authority and persons with LEP. Language data from the U.S Census Bureau's American Community Survey (ACS) was used to identify the most encountered languages throughout the Housing Authority's jurisdiction. This data assisted the Housing Authority in determining the extent to which services are needed in various languages and to ensure the Housing Authority is meeting the needs of the people with LEP whom we serve.

Pursuant to Executive Order 13166, Title VI regulations, and PIH Notice 2024-04, HUD's LEP guidance sets forth a four-factor analysis to use to determine the extent of the Housing Authority's commitment to provide services to individuals with LEP. This LAP is based on the four-factor analysis and is utilized to determine the appropriate language assistance services to ensure that persons with LEP have meaningful access to the Housing Authority services, activities, and programs.

Factor 1: Determine the number or proportion of LEP individuals in the eligible service population.

An analysis of data from the U.S. Census Bureau's 2022 American Community Survey (ACS) 5-Year Estimates (Table S1601) has identified Spanish as the language requiring meaningful language access provisions in Santa Cruz County and the cities of Hollister and San Juan Bautista.

This conclusion is based on the following key findings:

- **Limited English Proficiency (LEP) in Spanish:** A significant number of residents over the age of five identify as Spanish speakers with LEP. This is evidenced by two factors:
 - **Over 1,000 Residents:** More than 1,000 residents reported speaking English less than very well.
 - **Over 5% of the Population:** This LEP Spanish-speaking population constitutes at least 5% of the total population over five years old in the county.
- **LEP in Other Languages:** The analysis revealed LEP populations in other languages spoken in the Housing Authority’s jurisdiction. However, these populations are either less than 1% of the total population or consist of fewer than 1,000 speakers.
- **Supporting Evidence:** This analysis aligns with the Santa Cruz County Housing Authority's experience serving LEP residents and resonates with the feedback provided by local community organizations.

Table 1 details ACS survey results for languages spoken at home and the percentage of households in the County of Santa Cruz that speak English “less than very well.”

Table 1 –Language Spoken at Home - Santa Cruz County

Language grouping	Speaks English “Very well”	Speaks English “Less than very well”	Non-English speakers as percent of total population
Spanish	34,660	25,828	10.2%
Indo-European	6,998	1,687	0.6%
Asian / Pacific Island	4,547	2,267	0.8%
Other	1,414	183	< 0.1%

Source: US Census Bureau, 2022 American Community Survey, S1601-Language Spoken at Home <https://data.census.gov/table?q=s1601&g=050XX00US06087>

Table 2 details ACS survey results for languages spoken at home and the percentage of households in the cities of Hollister and San Juan Bautista that speak English “less than very well.”

Table 2 –Language Spoken at Home - Cities of Hollister and San Juan Bautista

Language grouping	Speaks English “Very well”	Speaks English “Less than very well”	Non-English speakers as percent of total population
Spanish	14,189	8,330	15%
Indo-European	507	153	0.3%
Asian / Pacific Island	648	420	0.7%
Other	24	80	0.1%

Source: US Census Bureau, 2022 American Community Survey, S1601-Language Spoken at Home <https://data.census.gov/table?q=s1601&g=860XX00US95023,95045>

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

The percent of households the Housing Authority serves with Spanish identified as their preferred language is 21.7%. Housing Authority staff come into contact with Spanish speaking participants and members of the public daily. Internal Housing Authority data show Housing Authority staff requested translation of non-vital documents into Spanish a total of fifty-seven (57) times in 2023.

Factor 3: The nature and importance of the program, activity, or service provided by the Housing Authority to LEP individuals.

The Housing Authority recognizes safe and decent housing as a fundamental human need. We are dedicated to providing quality, affordable housing options for low and moderate-income families and individuals in Santa Cruz County, and the cities of Hollister, and San Juan Bautista.

The Housing Authority prioritizes providing equitable access to all participants including ensuring meaningful access to equitable, timely, and quality language assistance services to families with limited English proficiency (LEP). This commitment extends to ensuring effective communication for individuals with limited English proficiency. We believe clear communication is essential for program success.

To fully benefit from our programs, all participants and members of the public, regardless of their preferred language, should have the ability to understand Housing Authority programs, services and activity guidelines. This includes attending mandatory activities such as voucher briefings, eligibility recertifications, and all services and voluntary program activities and programs the Housing Authority offers. Additionally, a clear

understanding of program requirements and regulations is crucial for obtaining a voucher, locating suitable housing, adhering to participant obligations, and maintaining program eligibility.

For participants in Housing Authority owned or operated properties, the ability to complete applications and understand occupancy policies is essential. Understanding lease or rental agreements, house rules, and program notices allows participants to enjoy their residence and maintain compliance with program regulations.

By guaranteeing meaningful access to equitable, timely, and high-quality language assistance services for all individuals with Limited English Proficient (LEP), the Housing Authority fosters a more just and equitable housing system that empowers all community members.

Factor 4: Determine the resources available to assist LEP individuals.

To identify resources for Limited English Proficient (LEP) individuals, the Housing Authority explored cost-effective methods for delivering language services. The Housing Authority utilizes qualified translation services for vital and non-vital document translations and certified translation services for oral interpretations when needed. These services ensure translators meet the qualifications necessary to provide the Housing Authority with timely and accurate translations services. The Housing Authority employs certified staff who frequently review vendor translated documents for accuracy.

Providing LEP Assistance:

The Housing Authority has implemented the following actions to provide resources for LEP individuals:

- Hiring and training bilingual staff.
- Offering third-party interpretation services over the phone at no cost to LEP individuals when necessary.
- Utilizing qualified written translation services to produce materials in non-English languages.
- Training public-facing employees on the available Housing Authority language assistance services.

IV. Language Assistance Services and Translations

The Housing Authority provides full oral interpretation and written translations in Spanish and functions as a completely bilingual Spanish-English agency. The Housing Authority arranges translation and interpretation services as needed for those who do not speak English or Spanish and uses professional translation services to ensure persons with LEP have meaningful access to equitable, timely, and high-quality language assistance services.

The Housing Authority employs thirty-nine (39) out of fifty-nine (59) total staff, or sixty-six percent (66%), who are bilingual in Spanish and English. Bilingual skills are certified through formal testing methods. This process is administered by the standard testing program through the Personnel Department of the County of Santa Cruz. The Housing Authority's bilingual staff ensures our ability to respond to individuals with LEP via phone, in-person contact and through written communications in Spanish.

Housing Authority staff will assist persons with LEP who cannot read their preferred language to the same extent as staff would assist English-speaking clients who cannot read English.

To further ensure meaningful accessibility, the Housing Authority website has a Spanish option that directs individuals with LEP to Housing Authority information and forms translated to Spanish by the Housing Authority's qualified translation services and utilizes the Google Translate function. Printed information about our programs and waiting lists is also distributed in Spanish and English languages.

The Housing Authority remains dedicated to continuous improvement of its language access services, ensuring language is not a barrier to safe and affordable housing.

V. Staff Training

All Housing Authority staff complete Fair Housing training annually. Newly hired staff complete the training as part of their orientation. Staff receive on the job training on the Housing Authority's programs, activities and services for persons with LEP.

The Language Access Plan will be:

- distributed to all supervisors and staff in positions that are likely to come in contact with members of the public and program participants (tenants).
- available at the Housing Authority main office.
- posted on the Housing Authority website.
- explained in orientation and training sessions for supervisors and other staff who need to communicate with persons with LEP.
- placed in the Housing Authority's shared forms and procedures directory so all staff have access to the LAP as needed.

Staff are instructed to arrange for a professional interpreter through the Executive Secretary when an applicant or participant speaks a language other than English or Spanish. The Housing Authority works with qualified, professional interpreter services.

VI. Vital Document Translation (Safe Harbor Provisions)

The Housing Authority provides written translations of vital documents for each eligible LEP language group that constitutes 5 percent (5%) or 1,000 individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

The Housing Authority has determined that because there are more than 5% and more than 1,000 Spanish-speakers in Santa Cruz County and the cities of Hollister and San Juan Bautista who speak English “less than very well,” documents will continue to be translated into Spanish as needed. As of the date of this LAP update, Spanish is the only language into which all documents (vital and non-vital) are translated. However, vital documents will be translated into other languages on an as-needed basis.

The Housing Authority has determined which vital documents are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and persons with LEP specifically.

Vital forms and documents include, but are not limited to:

1. Pre- and Initial Applications to receive Housing Authority benefits and services.
2. Consent and Complaint forms.
3. Written Notices of rights, obligations, denial, loss, or decreases in benefits or services, and hearings.
4. Leases and tenant rules
5. Request for Tenancy Approval
6. Notices of Eviction
7. Letters from the Housing Authority asking the applicant, recipient, or participant to take action.
8. Any other document considered vital by Housing Authority staff.

Appendix B: List of Spanish Documents and Forms provides a list, which includes but is not limited to, vital and non-vital documents and forms translated from English to Spanish. These documents are available on the Housing Authority website, at our offices, or upon request.

Important Note Regarding Translated Leases and Contracts:

According to Civil Code § 1632 (g) and (j), the signed English contract determines the rights and duties of the parties and is the prevailing legal document. Therefore, households with Limited English Proficiency will be asked to sign leases, rental agreements and other contracts in the English language and in the language preferred by the household.

VII. Notification of the Availability of Language Assistance at no Cost

All Housing Authority staff are responsible for ensuring all persons accessing Housing Authority programs, activities, and services, including peoples with LEP, are treated with compassion and kindness, and The Housing Authority shall provide meaningful access to equitable, timely, and quality language assistance services to individuals with limited English proficiency (LEP). The Housing Authority shall:

- Post signs in all areas accessible by visitors and program participants, including video-loop signage in the Housing Authority lobby,
- Include multilingual options on the Housing Authority automated phone system.
- Make this Language Access Plan available on the Housing Authority website at <https://hacosantacruz.org/>.

VIII. Monitoring and Updating the Language Access Plan (LAP).

The Housing Authority is committed to ensuring people with Limited English Proficiency (LEP) have equal access to all Housing Authority programs and services.

The Housing Authority shall:

- **Re-evaluate the LAP every five years:** The Housing Authority will review this plan as needed but at least every five years to ensure individuals with LEP have continuous, meaningful access to equitable, timely, and quality language assistance services.
- **Maintain compliance with Executive Order 13166:** The Housing Authority will ensure this LAP meets the requirements of this law.
- **Other LEP related guidance:** The Housing Authority will ensure this LAP complies with other federal and state guidelines that address how to serve LEP communities and consider these guidelines when updating this LAP.
- **Ensure LEP communities have continuous meaningful access:** The Housing Authority is committed to ensuring persons with LEP have equitable access to our programs, services, and activities and can achieve meaningful participation. This commitment includes providing translated vital and non-vital documents, access to interpreters, and employing bilingual staff.

By regularly reviewing the Language Access Plan, the Housing Authority can continuously provide LEP communities equal opportunities and access all Housing Authority programs and services.

IX. Appendix A: Definitions

Bilingual/Multilingual Staff – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding Spanish.

Interpretation – The act of listening to a communication in one language and orally converting it to another language while retaining the same meaning.

Language Access – Is achieved when persons with LEP can communicate effectively with Housing Authority employees and participate in Housing Authority programs and activities.

Persons with Limited English Proficient (LEP) – Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Persons with LEP may be competent in English for certain types of communication, but still be LEP for other purposes.

Meaningful Access – Language assistance that results in accurate, timely, and effective communication at no cost to the person with LEP. For persons with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

Preferred/Primary Language – The language that a person with LEP identifies as the preferred language that he or she uses to communicate effectively.

Program or Activity – The term “program or activity” and the term “program” mean all the operations of the Housing Authority.

Translation – The replacement of written text from one language into an equivalent written text in another language.

Vital Documents – Paper or electronic written material that contains information that is critical for accessing Housing Authority programs or activities or is required by law. Vital documents include, for example: applications, model leases, disaster planning formation, consent, and complaint forms; notices of rights and disciplinary action; notices advising persons with LEP of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services.

X. Appendix B: List of Documents and Forms in Spanish

Forms and Documents Available on the Housing Authority Website include but are not limited to:

Application to Add New Members to the Household
Request to Remove Members from the Household
Income Change Form
Transfer Request Form
Portability Request Form
Request for Consent to Act on Tenant's Behalf
Self-Employment Certification
Housing Search Extension Request Form
HUD - Authorization to Release Information
PHA - Authorization to Release Information
How to Figure Out What You Pay in Rent - Section 8 Only
Self-Certification Form
HUD - Things to Know about your Housing Assistance
Rental Property Search Form
Supplement to Application for Federally Assisted Housing
Program Violations and/or Fraud Reporting Form
What You Should Know About EIV

Other Forms and Documents include but are not limited to:

Fair Housing Rights
Are You A Victim of Housing Discrimination?
Legal Assistance and Tenant-Landlord Rights
Santa Cruz County Resource Guide
Notice of Occupancy Rights under Violence Against Women's Act (VAWA)
Certification of VAWA
Housing Choice Voucher Extension Request Form
Reasonable Accommodation request Form

XI. Appendix C: Additional Resources

If viewing this document electronically you may be able to Ctrl + Click to follow the link directly, otherwise, use a search engine to search for the title of the resource. If you cannot access the resources listed, please contact the Housing Authority for assistance.

[File a Complaint in a Language Other Than English](#)

[HUD's 2021-2026 Language Access Plan](#)

[Interagency LEP Resources](#)

[HUD Guidance on LEP and the Fair Housing Act](#)

[HUD Guidance on LEP and Title VI](#)

[Limited English Proficiency FAQ](#)

[Executive Order 13166](#)

[HUD Translated Documents](#)

[Fair Housing Outreach Materials in English and Other Languages](#)