



# CITY OF IRVINE

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## Language Access Plan

August 2024

## Executive Summary

As a recipient of federal Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) funds, the City of Irvine (“City” or “Irvine”) is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the City’s programs and activities. Meaningful access is defined as language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (LEP), Title VI of the Civil Right Act of 1964, provides the basis for these requirements.

To ensure the appropriate targeting of resources, the City conducted a “Four Factor Analysis” in accordance with U.S. Department of Justice LEP Guidance; evaluating: 1) the number or proportion of LEP persons in the population to be served, 2) the frequency with which LEP persons come into contact with the program activity or service, 3) the importance of the service, information, program, and/or activity, and 4) the resources, financial and human, available to the City. The analysis was conducted in the context of “safe harbor” thresholds provided by the U.S. Department of Housing and Urban Development (HUD).

After determining the applicable language groups that may require LEP assistance, a review of HUD-funded programs and services was conducted, along with the relationship of those programs and services to the target populations. A final analysis was then conducted to determine available staffing and other resources to meet LEP needs for translation services.

A Language Access Plan was then developed, focused on the provision of translation and interpretation services to LEP individuals who speak the following languages:

- |                                     |               |
|-------------------------------------|---------------|
| 1. Spanish                          | 5. Korean     |
| 2. Persian (Farsi)                  | 6. Vietnamese |
| 3. Chinese (Mandarin and Cantonese) | 7. Arabic     |
| 4. Japanese                         |               |

Through the Language Access Plan, the City commits to continuing language assistance efforts already being conducted, including but not limited to the following:

1. Provide free oral interpretation services at the various facilities where the City provides federally-funded activities and services;
2. Perform written translations for all documents deemed vital for each program/activity;
3. Conduct targeted outreach to LEP populations via community contacts and ethnic and foreign media; and
4. Train staff on the requirements of the plan and its effective implementation at the staff, program, and project level.

## Plan Purpose

As a recipient of federal Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) funds, the City of Irvine (“City” or “Irvine”) is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the City’s programs and

activities. Meaningful access is defined as language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual.

This LEP Plan is established pursuant to and in accordance with Executive Order 13166, "Improving Access to Services for Persons With Limited English Proficiency," Title VI of the Civil Right Act of 1964, and the Department of Housing and Urban Development's (HUD) Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, dated January 22, 2007, and effective February 21, 2007.

LEP persons are those whose proficiency in speaking, reading, writing, or understanding English is such that it would deny or limit their meaningful access to programs and services provided by the City if language assistance were not provided.

Executive Order No. 13166 was adopted to ensure meaningful access to federally conducted and federally assisted programs and activities for persons who, as a result of their national origin, are limited in their English proficiency. National origin discrimination has been interpreted broadly to include the denial of meaningful access to a program because of an individual's, or their ancestors', place of origin. This includes whether that person has the physical, cultural, or linguistic characteristics of a national origin group.

## City Policy

The City of Irvine is committed to ensuring that programs and resources are accessible to LEP persons, without discrimination on the basis of national origin. The City is further committed to providing translation assistance to LEP persons for whom the population speaking their primary language constitutes at least 1,000 persons or five percent of the City's eligible population.

## Needs Assessment: Four-Factor Analysis

As a recipient of federal funding, the City is required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The following four-factor analysis is the starting point for creating a plan which addresses LEP needs and provides adequate language assistance:

### Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

According to the U.S. Census Bureau's 2018-2022 American Community Survey (ACS) 5-Year Estimates, Irvine has a population of approximately 284,209. Around half of Irvine's residents speak a language other than English at home. Of critical concern for the development of this Plan is the language spoken at home by individuals who speak English less than "very well", which is demonstrated in the table below:

Language Spoken at Home, City of Irvine		
Population 5 years of age and over	Number	Percent

	<b>284,209</b>	<b>100%</b>
English only	140,908	49.6%
Language other than English	143,301	50.4%
Speaks English less than “very well”	45,787	16.1%
Spanish	18,296	6.4%
Speaks English less than “very well”	2,554	0.9%
Other Indo-European languages	25,018	8.8%
Speaks English less than “very well”	6,924	2.4%
Asian and Pacific Islander languages	84,940	29.9%
Speaks English less than “very well”	34,466	12.1%
Other languages	8,123	2.9%
Speaks English less than “very well”	1,843	0.6%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates (Table S1601)

HUD has provided “safe harbor” guidance to determine when to provide translation of vital documents. The Safe Harbor rule for written translation of vital documents is based on the number and percentages of the eligible population in a service area, or current LEP beneficiaries and applicants.

Per the Safe Harbor rule, HUD expects translation of vital documents to be provided when the eligible LEP population in the service area or current beneficiaries exceed 1,000 persons, or if it exceeds 5 percent of the eligible population. In cases where more than 5 percent of the eligible population speaks a particular language but fewer than 50 people are affected, there should be a translated written notice of the person’s right to an oral interpretation. The table below shows the recommended language assistance that should be provided based on the size of the language group:

<b>Safe Harbor Guidance: Size of Language Group and Recommended Provision of Language Assistance</b>	
1,000+ of the eligible population in the service area, or among current beneficiaries	Translate vital documents
> 5% of the eligible population or beneficiaries, <i>and</i> 50+ in number	Translate vital documents
> 5% of the eligible population or beneficiaries, <i>and</i> 50 or less in number	Translate 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

## Analysis

The relevant data in the “Language Spoken at Home” table, above, are summarized in the following table:

<b>Speak English less than “very well”</b>		
<b>Language Spoken at Home</b>	<b>Population 5 years and over</b>	<b>% of Eligible Population</b>
Spanish	2,554	0.9%
Other Indo-European languages	6,924	2.4%
Asian and Pacific Islander languages	34,466	12.1%
Other Languages	1,843	0.6%

Source: Extracted from the “Language Spoken at Home” data

For the purposes of this review, the “eligible population” is defined as the City’s population over the age of five years, which is 284,209 persons according to the 2018-2022 ACS estimates. This standard is applied to facilitate review and interpretation of the available U.S. Census and ACS data, and to provide the most conservative assessment of LEP needs.

The “Language Spoken at Home” table provides data for the four (4) major language classifications employed by the ACS. All four (4) of the major language classifications contain an eligible population exceeding the 1,000 person safe harbor threshold (the population speaking Asian and Pacific Islander languages also exceeds the 5 percent safe harbor threshold).

### Spanish

The 2,554 Spanish speaking persons indicating they speak English less than “very well”, constitutes 0.9 percent of the eligible population of 284,209 persons. This exceeds the 1,000-person threshold established under HUD’s safe harbor guidance. Based on this determination, the translation of vital documents into Spanish is required.

### Other Indo-European languages, Asian and Pacific Islander languages, and Other Languages

Further review is required to determine the specific Other Indo-European languages, Asian and Pacific Islander languages, and Other Languages which will require LEP translation services. Additional data on the specific languages spoken in the City are unavailable using the 2018-2022 ACS estimates. The most recent data available for “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” in the City are from the 2011-2015 ACS 5-year estimates. According to the more detailed dataset, the “eligible population” (i.e. City’s population over the age of five years) is 225,151 persons. The table below shows the more specific data for the City:

<b>Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine</b>			
<b>Language</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>% of Eligible Population</b>
Total Population 5 Years and Over:	225,151	+/-1,052	100.000%
Speak only English	117,514	+/-3,033	52.193%
French (incl. Patois, Cajun):	930	+/-391	0.413%
Speak English "very well"	806	+/-375	0.358%
Speak English less than "very well"	124	+/-77	0.055%
French Creole:	48	+/-91	0.021%
Speak English "very well"	25	+/-45	0.011%
Speak English less than "very well"	23	+/-46	0.010%
Italian:	734	+/-344	0.326%
Speak English "very well"	652	+/-316	0.290%
Speak English less than "very well"	82	+/-65	0.036%
Portuguese or Portuguese Creole:	675	+/-405	0.300%
Speak English "very well"	483	+/-287	0.215%
Speak English less than "very well"	192	+/-136	0.085%
German:	833	+/-290	0.370%
Speak English "very well"	693	+/-231	0.308%
Speak English less than "very well"	140	+/-127	0.062%
Yiddish:	27	+/-42	0.012%
Speak English "very well"	27	+/-42	0.012%
Speak English less than "very well"	0	+/-28	0.000%
Other West Germanic languages:	250	+/-132	0.111%
Speak English "very well"	231	+/-122	0.103%
Speak English less than "very well"	19	+/-31	0.008%
Scandinavian languages:	138	+/-92	0.061%
Speak English "very well"	120	+/-87	0.053%
Speak English less than "very well"	18	+/-28	0.008%
Greek:	107	+/-87	0.048%
Speak English "very well"	78	+/-52	0.035%
Speak English less than "very well"	29	+/-45	0.013%
Russian:	1,637	+/-424	0.727%
Speak English "very well"	900	+/-290	0.400%
Speak English less than "very well"	737	+/-260	0.327%
Polish:	188	+/-104	0.083%
Speak English "very well"	177	+/-100	0.079%
Speak English less than "very well"	11	+/-17	0.005%
Serbo-Croatian:	235	+/-221	0.104%
Speak English "very well"	172	+/-164	0.076%
Speak English less than "very well"	63	+/-76	0.028%

<b>Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine</b>			
<b>Language</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>% of Eligible Population</b>
Other Slavic languages:	145	+/-103	0.064%
Speak English "very well"	125	+/-98	0.056%
Speak English less than "very well"	20	+/-25	0.009%
Armenian:	465	+/-249	0.207%
Speak English "very well"	412	+/-233	0.183%
Speak English less than "very well"	53	+/-55	0.024%
Persian:	10,351	+/-1,690	4.597%
Speak English "very well"	6,374	+/-1,501	2.831%
Speak English less than "very well"	3,977	+/-701	1.766%
Gujarati:	1,184	+/-605	0.526%
Speak English "very well"	934	+/-504	0.415%
Speak English less than "very well"	250	+/-165	0.111%
Hindi:	3,007	+/-658	1.336%
Speak English "very well"	2,563	+/-667	1.138%
Speak English less than "very well"	444	+/-196	0.197%
Urdu:	2,042	+/-719	0.907%
Speak English "very well"	1,676	+/-558	0.744%
Speak English less than "very well"	366	+/-235	0.163%
Other Indic languages:	3,332	+/-896	1.480%
Speak English "very well"	2,728	+/-832	1.212%
Speak English less than "very well"	604	+/-242	0.268%
Other Indo-European languages:	869	+/-498	0.386%
Speak English "very well"	637	+/-383	0.283%
Speak English less than "very well"	232	+/-193	0.103%
Chinese:	25,158	+/-2,232	11.174%
Speak English "very well"	14,290	+/-1,347	6.347%
Speak English less than "very well"	10,868	+/-1,316	4.827%
Japanese:	4,637	+/-869	2.060%
Speak English "very well"	1,913	+/-505	0.850%
Speak English less than "very well"	2,724	+/-564	1.210%
Korean:	15,312	+/-2,407	6.801%
Speak English "very well"	9,020	+/-1,738	4.006%
Speak English less than "very well"	6,292	+/-1,135	2.795%
Mon-Khmer, Cambodian:	275	+/-191	0.122%
Speak English "very well"	123	+/-101	0.055%
Speak English less than "very well"	152	+/-105	0.068%
Hmong:	30	+/-26	0.013%
Speak English "very well"	7	+/-9	0.003%

<b>Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine</b>			
<b>Language</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>% of Eligible Population</b>
Speak English less than "very well"	23	+/-24	0.010%
Thai:	584	+/-315	0.259%
Speak English "very well"	313	+/-205	0.139%
Speak English less than "very well"	271	+/-175	0.120%
Laotian:	76	+/-83	0.034%
Speak English "very well"	76	+/-83	0.034%
Speak English less than "very well"	0	+/-28	0.000%
Vietnamese:	6,928	+/-1,294	3.077%
Speak English "very well"	5,058	+/-1,162	2.246%
Speak English less than "very well"	1,870	+/-468	0.831%
Other Asian languages:	3,054	+/-611	1.356%
Speak English "very well"	2,504	+/-507	1.112%
Speak English less than "very well"	550	+/-227	0.244%
Tagalog:	3,330	+/-971	1.479%
Speak English "very well"	2,665	+/-928	1.184%
Speak English less than "very well"	665	+/-289	0.295%
Other Pacific Island languages:	970	+/-468	0.431%
Speak English "very well"	751	+/-457	0.334%
Speak English less than "very well"	219	+/-132	0.097%
Navajo:	0	+/-28	0.000%
Speak English "very well"	0	+/-28	0.000%
Speak English less than "very well"	0	+/-28	0.000%
Other Native North American languages:	38	+/-42	0.017%
Speak English "very well"	38	+/-42	0.017%
Speak English less than "very well"	0	+/-28	0.000%
Hungarian:	260	+/-192	0.115%
Speak English "very well"	245	+/-188	0.109%
Speak English less than "very well"	15	+/-24	0.007%
Arabic:	5,164	+/-1,325	2.294%
Speak English "very well"	3,374	+/-803	1.499%
Speak English less than "very well"	1,790	+/-743	0.795%
Hebrew:	631	+/-285	0.280%
Speak English "very well"	538	+/-265	0.239%
Speak English less than "very well"	93	+/-88	0.041%
African languages:	454	+/-316	0.202%
Speak English "very well"	266	+/-142	0.118%
Speak English less than "very well"	188	+/-193	0.083%
Other and unspecified languages:	78	+/-82	0.035%

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine			
Language	Estimate	Margin of Error	% of Eligible Population
Speak English "very well"	67	+/-72	0.030%
Speak English less than "very well"	11	+/-15	0.005%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (Table B16001)

Based on the 2011-2015 ACS data, shown in the table above, the following language groups meet the "safe harbor" criteria of containing 1,000 or more persons who speak English less than "very well" (none exceeded the threshold of five percent of the eligible population):

#### Persian (Farsi)

According to the 2011-2015 ACS estimates, of the various Indo-European languages, only the Persian language (Farsi) exceeds the 1,000-person threshold established under HUD's safe harbor guidance. Approximately 3,977 persons in the City of Irvine who primarily speak Farsi indicated they spoke English less than "very well". Based on this determination, the translation of vital documents into Farsi is required.

#### Chinese (Mandarin and Cantonese)

Approximately 10,868 persons over the age of 5 years, or 4.827 percent of Irvine's population over the age of 5 years, speak Chinese at home and indicated they speak English less than "very well."

The Chinese language provides challenges in that there are two (2) major written character systems, and seven (7) major dialects. The two (2) major written character systems are traditional Chinese and Taiwanese characters. Among the various dialects, the majority share the same traditional written Chinese character system, which can be utilized to translate vital documents for LEP persons.

Since the 10,868 Chinese speaking persons who indicated they speak English less than "very well" exceeds the HUD safe harbor thresholds of 1,000 persons, the translation of vital documents into Chinese is required. Based on City staff's knowledge of, and prior experience with, City residents and program participants, Mandarin and Cantonese translation would be beneficial to the largest segment of the Chinese LEP population.

#### Japanese

Irvine has a Japanese speaking population of approximately 2,724 persons, or 1.210 percent of the eligible population. While the U.S. Census Bureau does not provide data regarding the number of persons speaking various Japanese dialects in Irvine, distinctions between the dialects are minimized by the growth of standard Japanese throughout Japan. Because the number of Japanese speakers who speak English less than "very well" exceeds HUD's 1,000-person safe harbor threshold, vital documents are required to be translated into Japanese.

**Korean**

There are approximately 6,292 persons, or 2.80 percent of Irvine's eligible population, that are Korean speakers and that speak English less than "very well." As such, the Korean language exceeds the 1,000-person threshold provided under HUD's safe harbor guidance, thereby requiring the translation of vital documents into Korean. While the Korean language contains local dialects, most are mutually intelligible with the standard Korean language of the Seoul region.

**Vietnamese**

There are approximately 1,870 Vietnamese-speaking persons, or 0.83 percent of Irvine's eligible population, who speak English less than "very well." The Vietnamese-speaking population is distributed over three major dialects that are differentiated by regions: Northern Vietnamese, Central Vietnamese, and Southern Vietnamese. While each of the dialects differs in sound systems, vocabulary, and grammar, there are numerous mutually intelligible regional dialects. Given this mutual intelligibility, for the purposes of this analysis, the Vietnamese language is treated as homogenous. Since the 1,870 Vietnamese speaking persons who speak English less than "very well" exceeds the HUD safe harbor threshold of 1,000 persons, the translation of vital documents into the Vietnamese language is required.

**Arabic**

According to the 2011-2015 ACS data, approximately 1,790 Arabic-speaking persons in Irvine speak English less than "very well", which exceeds the 1,000 person threshold established under HUD's safe harbor guidance. Based on this determination, the translation of vital documents into the Arabic language is required.

The following table summarizes the languages that meet the 1,000-person or 5 percent thresholds established under HUD's safe harbor guidance, and for which, as a result, the translation of vital documents into is required.

<b>Language groups with either 1,000 persons or more, or at least 5% of the eligible population, indicating that they speak English less than "very well"</b>		
<b>Language</b>	<b>Estimate</b>	<b>% of Eligible Population</b>
Spanish:	18,296	6.4%
Speak English less than "very well"	2,554	0.9%
Persian:	10,351	4.597%
Speak English less than "very well"	3,977	1.766%
Chinese:	25,158	11.174%
Speak English less than "very well"	10,868	4.827%
Japanese:	4,637	2.060%

Language groups with either 1,000 persons or more, or at least 5% of the eligible population, indicating that they speak English less than “very well”		
Speak English less than "very well"	2,724	1.210%
Korean:	15,312	6.801%
Speak English less than "very well"	6,292	2.795%
Vietnamese:	6,928	3.077%
Speak English less than "very well"	1,870	0.831%
Arabic	5,164	2.294%
Speak English less than "very well"	1,790	0.795%

Source: Data extracted from the “Language Spoken at Home” table for Spanish, and “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” table for Persian, Chinese, Japanese, Korean, Vietnamese, and Arabic

**Factor 2: The frequency with which LEP persons come into contact with the program.**

Each year, the City conducts a wide variety of programs utilizing HUD funding. While programs and their respective funding levels vary from year to year, the general activities have remained relatively consistent. As such, this LEP Plan is designed to be effective for the five-year period between 2025-2026 and 2030-2031. If HUD-funded projects or programs are initiated that are not adequately considered under this LEP Plan, an amendment to the Plan shall be performed to appropriately address the newly proposed activities.

The following table lists the City’s relevant program activities. For each program activity, the table lists the frequency with which LEP persons are likely to come into contact with the City and the methods through which LEP persons are most likely to interact with the City and receive/provide information.

Program Activity	Frequency	Level of Interaction
CDBG, ESG, and HOME Administration	Annual	Attend public meetings and hearings. Visit City website. Read documents, brochures, posters, and flyers intended for public distribution.
CDBG Public Service Activities	Daily	Call City offices. Email City staff. Visit City website. Visit City offices. Read documents, brochures, posters, and flyers intended for public distribution. Complete program-related paperwork.
CDBG Capital Projects	None	None.
ESG Homeless Services / HMIS	Daily	Call City offices. Email City staff. Visit City website. Visit City offices.

		Read documents, brochures, posters, and flyers intended for public distribution. Complete program-related paperwork.
HOME Homeowner, Rental, and CHDO Activities	Daily	Call City offices. Email City staff. Visit City website. Visit City offices. Read documents, brochures, posters, and flyers intended for public distribution. Complete program-related paperwork.

**Factor 3: The nature and importance of the activity or service provided by the program to people’s lives.**

The City’s CDBG-, ESG-, and HOME-funded activities have the potential to positively impact the lives of all the City’s residents. The table below lists the direct benefits to participants for each program activity.

Program	Benefits
CDBG, ESG, and HOME Administration	The CDBG, ESG, and HOME Administration activities provide administrative oversight and, as such, include implementation of the citizen participation process for these federally funded activities. The citizen participation process is a key step in determining how these funds will be deployed annually.
CDBG Public Service Activities	Public services such as food assistance, support services for victims of domestic violence, child-care, fair housing services, and others, are made available to primarily benefit low- and moderate-income (LMI) residents whose incomes are at or below 80% of the Area Median Income (AMI).
CDBG Capital Projects	Capital improvement projects such as sidewalk improvements, energy efficiency upgrades, and others, make physical improvements in LMI areas or to exclusively benefit presumed LMI clientele.
ESG Homeless Services / HMIS	Homeless services such as rapid-rehousing assistance, street outreach, and emergency shelter operations, assist people with regaining stability after experiencing a housing crisis or homelessness. (HMIS is the information technology system used to collect and report data on the provision of housing and services to individuals and families at risk of and experiencing homelessness).
HOME Homeowner, Rental, and CHDO Activities	Homeowner, rental, and CHDO activities, including building, buying, and/or rehabilitating affordable

Program	Benefits
	housing for rent or homeownership, or providing direct rental assistance to low-income people, create affordable housing for low-income households.

**Factor 4: The resources available to the grantee/recipient and costs**

The City currently has bilingual staff available for the provision of interpretation services in all facilities where the City is the direct provider of federally funded services, for the following languages:

- Spanish
- Persian (Farsi)
- Chinese (Mandarin and Cantonese)
- Japanese
- Korean
- Vietnamese
- Arabic

Employees who have passed their respective language proficiency examination and provide bilingual staff services are compensated for those services in the form of an employee benefit (i.e. bilingual pay) which is paid using General Fund resources.

In addition, the City also currently provides the following resources and services for LEP persons:

- Translation for most non-legal program-related documents requiring translation into the languages listed above.
- Upon request, interpretation services at all major public meetings.

**Language Access Plan**

Based on the Four-Factor Analysis, the greatest need for LEP resources is in the provision of language translation services for Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic speakers. To meet these needs, the City will implement the measures listed below.

1. The City’s Communications & Engagement staff will ensure that translation is provided in the eight languages identified in the Four Factor Analysis: Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic.

**Provide Interpretation and Translation Services**

2. Continue to provide free oral interpretation services for Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic speakers, at the

various facilities where the City provides federally-funded activities and services. Interpreters will be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the LEP individual. City staff providing interpretation services will have passed their respective language proficiency examination.

3. While interpretation services are generally available, enhanced efforts are generally required in the provision of translation services for vital documents. "Vital documents" are those that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically, to activities supported by federal funds or that are required by law. Vital documents contain information that is critical for obtaining or maintaining services or benefits to the LEP populations they serve. Such documents may include but are not limited to outreach materials, applications, consent and complaint forms, notices of participant rights and responsibilities, notices of denial, loss, or decreases in benefits or services, disciplinary notices, letters or notices that require a response from the participant or beneficiary, hearing notices, legal notices, notices of public hearings, especially those that meet HUD's Community and Planning Development citizen participation requirement, leases and tenant rules, applications to participate in a federally funded program or activity or to receive benefits or services, and notices advising LEP persons of the availability of free language services.

As necessary, the City shall perform written translations for all documents deemed vital for each program offered for all the language needs identified in the Four Factor Analysis: Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic.

The City further commits to the following:

- a. All Public Notices published pursuant to the Citizen Participation Plan shall include a statement in the Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic languages, indicating the availability of interpretive services upon request.
- b. For subrecipients who anticipate or experience frequent contact with LEP persons, the City shall encourage them to translate outreach and vital documents, provided that sufficient resources are available. Interpretive services and document translation shall be eligible CDBG, ESG, and HOME project delivery costs.
- c. Where larger documents are encountered which contain both vital and non-vital information, and the provision of multiple translations is not deemed to be a feasible option, the document shall at a minimum contain translations in the languages identified in the Four Factor Analysis of the contact information directing LEP persons to available interpretation or translation services.
- d. Where HUD or other forms have been translated and a participant signature is required, the participant shall sign the English version of the form as the legally binding document, with the translation version attached. Translations which require signature shall carry the disclaimer that: "This document is a translation of

a HUD-issued and/or required document. This translation is provided to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document.”

4. Provide content in Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic on the main page(s) of the program website(s). Additionally, the City's website allows users to translate content into these languages via Google Translate.
5. Explore access to community-based services to provide additional translation and interpretation services for the languages identified in the Four Factor Analysis.
6. As necessary, assist subrecipients in assessing their potential LEP translation needs and in developing an appropriate course of action based on the assessment.
7. For handling verbal and written communication with LEP individuals in less frequently encountered languages, the City will utilize bilingual staff and a language line service for telephone conversations between City staff and LEP persons who speak a language for which no bilingual staff are available.

#### **Provide Notices to LEP Persons**

8. Where feasible, provide a posted sign in intake areas advising of the availability of free LEP language services.
9. On all printed materials, include a “tag line” that states "For more information, please call 1-XXX-XXX-XXXX" translated into all eight languages identified in the Four Factor Analysis.
10. Conduct targeted outreach to LEP populations via community contacts and ethnic and foreign media. The City maintains a multilingual media distribution list of media outlets that receive all press releases and other pertinent City information. Additionally, the City places ads in-language in media publications in all eight of the City's languages identified in the Four Factor Analysis.

#### **Train Staff on Plan**

11. As necessary, provide annual staff training on the requirements of this plan and its effective implementation at the staff, program, and project level; inclusive of:
  - a. Sensitivity to an LEP person's needs;
  - b. Internal and external translation and interpretation resources available and the methods of accessing them; and
  - c. Protocols and network (internal staff and external third-party providers) for addressing and processing LEP inquiries (oral [phone or in-person] or written).

## **Plan Monitoring and Update**

This plan was originally prepared and approved during the 2025-2030 Consolidated Plan cycle. City staff shall review this plan annually to ensure conformance with all statutory requirements, monitor changes in the language characteristics of its population, evaluate its effectiveness, and make modifications as necessary to accommodate changes to federally funded programs and projects.