

# LANGUAGE ACCESS PLAN

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**The Los Angeles County Development Authority  
Improving Access Services for Persons  
with Limited English Proficiency  
Revised January 1, 2023**



# LACDA

Los Angeles County Development Authority

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## Language Access Plan for those with Limited English Proficiency

### I Introduction

In accordance with federal, state and local law, specifically Executive Order 13166, Housing and Urban Development (HUD) Limited English Proficiency (LEP) Guidance and Section 7290 et seq. of the California Government Codes (“Dymally-Alatorre Bilingual Services Act”) the Los Angeles County Development Authority (LACDA) will provide meaningful access to its programs and activities to persons with LEP and undertake reasonable efforts to provide or arrange free language assistance for LEP applicants or participants of the Housing Choice Voucher program and all other rental assistance programs administered by the Housing Assistance Division.

### II Plan Statement

The LACDA will make every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

Los Angeles County has a diverse population where many languages are spoken. A substantial number of persons that speak these languages do not speak English or speak English less than very well and are considered Limited English Proficient (LEP).

The LACDA staff will provide meaningful access to the LACDA’s programs. 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. The LACDA will provide language assistance to applicants and participants who have difficulty communicating in English, who identify themselves as LEP or who request language assistance. Applicants will be asked at the time of application and participants will be asked at the time of annual reexamination to designate their primary language for both oral and written services and whether LEP services are needed. This information will be recorded in the electronic case file.

Pursuant to Executive Order 13166 and the meaningful access requirement of the Title VI regulations, HUD’s LEP guidance sets forth a four-factor analysis for recipients to use to determine the extent of its obligation to provide services to LEP persons. This analysis is based on the following data:

1. **LEP Population** - The number or percentage of LEP persons served or likely to be encountered by the LACDA.
2. **Frequency of Contact** - The frequency with which LEP persons using a particular language come into contact with LACDA programs.

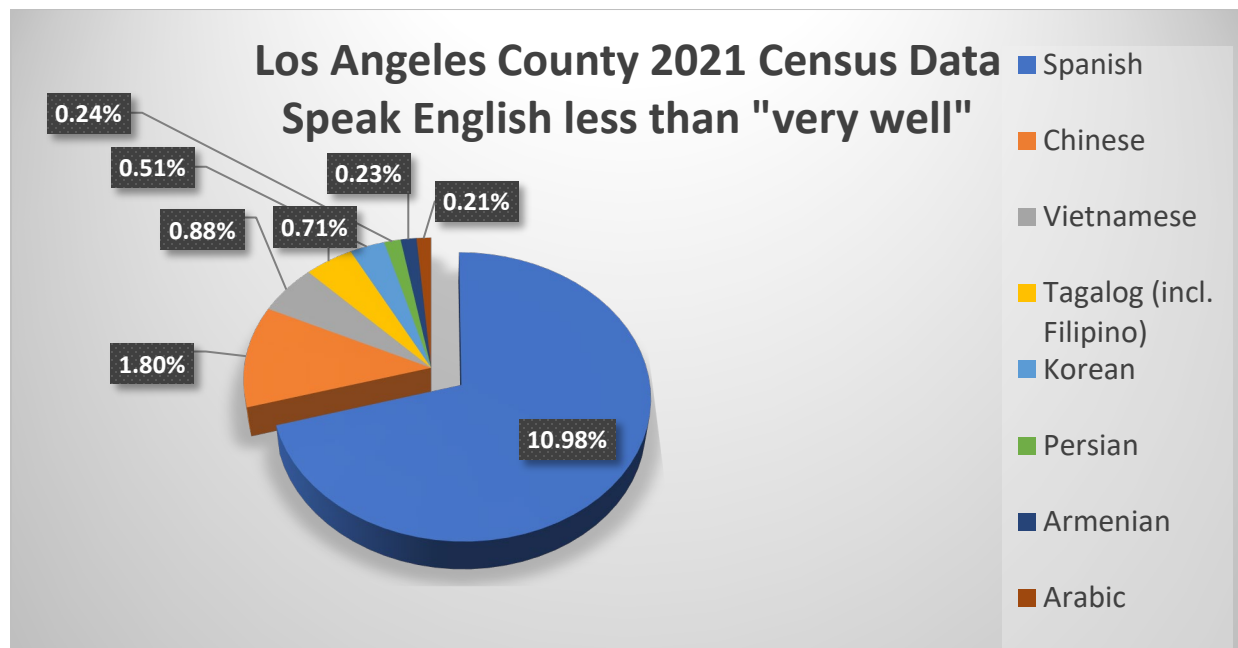
3. **Importance** - The nature and importance of the LACDA program, activity or service to the person's life.
4. **Resources** - The LACDA's resources and the cost of providing meaningful access.

### III Factor 1: Determine the Number or Percentage of LEP Persons Served or Encountered in the Eligible Service Area:

Since Los Angeles County has large LEP populations, the LACDA and public hearings must ensure that language services are provided or are available. For example, each year the public notice for the Annual Action Plan is printed in various languages and translation services are provided upon request for public housing.

This assessment would include determining the level of need for both current and potential programs participants based on the LEP populations that resides in the service area.

This determination has been made by using the 2021 U.S. Census Bureau's American Community Survey (ACS) data from website <https://data.census.gov/> and references to the Housing Authority City of Los Angeles and San Diego Housing Commission language accommodations. ACS estimates a number of languages spoken by county residents to create a list of 42 languages. For purposes of this analysis, those who have identified themselves as speaking English "less than very well," will be defined as LEP persons.



Sources: U.S. Census, 2021 American Community Survey 1-Year Results B16001 data file

The LACDA will assess the number or proportion of LEP persons served and encountered in the eligible service area by the following criteria:

- ❖ A determination as to whether 5 percent or 1,000 participants from the Housing Authority's-administered programs or persons from the waiting list speak a specific language, which triggers consideration of document translation needs.
- ❖ Review of demographic data that indicates prevalent languages in Los Angeles County.
- ❖ Analysis of staff requests for formal interpreters: the number of requests, the languages requested, the costs, etc.

### **Additional Assessments for Consideration**

To further assess the number or proportion of LEP persons served or encountered in the eligible service area, the LACDA will make reasonable efforts to review language accommodations from other organizations. Analyzing comparable organizations or agencies to the Housing Authority thus enhances the accuracy of language needs and demographic data in Los Angeles County.

**HACLA:** Similar to LACDA, the Housing Authority City of Los Angeles (HACLA) provides translation services under all its programs, properties, and related facilities in accordance with the Limited English Proficiency policy. HACLA identifies the following languages for LEP:

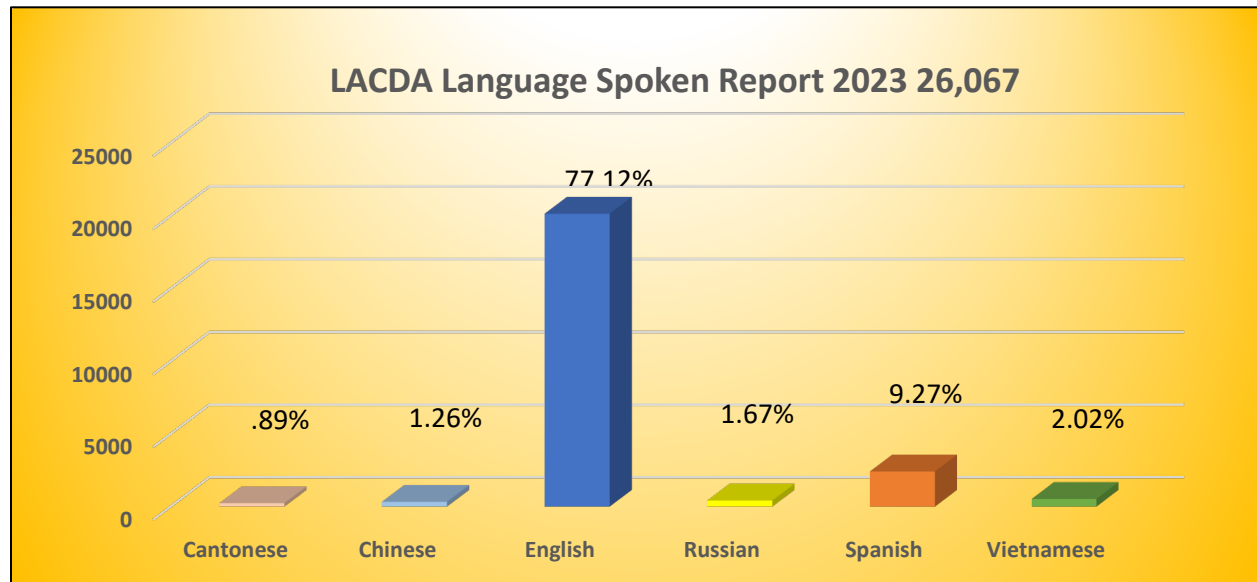
- ❖ Spanish
- ❖ Armenian

**SDHC:** Similar to LACDA, the San Diego Housing Commission (SDHC) provides translation services under all its programs, properties, and related facilities in accordance with the Limited English Proficiency policy. SDHC identifies the following languages for LEP:

- ❖ Spanish
- ❖ Vietnamese

## IV Factor 2: The Frequency With Which LEP Persons Come In Contact With The Program:

The frequency of LEP contact should be considered relative to the specific program and the geographic area being served. Specifically, the more frequently a LEP person from a specific group contracts or requests access to a program, the greater the need for enhanced language services for this group. For example, providing public and housing services will typically require ongoing communication, which may require enhanced language series such as written and/or oral translations, while other programs with less frequent contact, such as complaint process, may require only limited language services.



### V Factor 3: The Importance of the Information, Services, Program, or the Activity to People’s Lives:

The more important the activity, or the greater the possible consequences of the contact to LEP persons, the more likely the need for language services. Due to the critical role that housing plays in maintaining quality of life, it ranks higher on the critical/non-critical continuum. As a measure for determining whether a document requires translation, the LACDA considers the threshold of a “vital document.” Per the HUD guidance, “vital documents” are those that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically.

In consideration above, the LACDA will annually assess its documents to identify any additional vital documents that need to be translated. The LACDA will then translate a portion of those documents identified every year as financially feasible. If the vital document has not been translated, the LACDA will provide the applicant or participant with oral translation.

### VI Factor 4: Costs Verses Resources and Benefits:

Reasonable steps to provide language access may cease to be reasonable when costs substantially exceed the benefits. The guidelines provide ideas on how a recipient may maximize services and minimize costs, such as centralizing or sharing interpret and translation services to achieve economics of scale. However, the guidelines note that no matter how few LEP persons the recipient is serving, oral interpretation services should be made available in some form.

The LACDA maintains a list of qualified, bilingual employees who have applied for, and tested for proficiency in interpreting and/or translating languages from English into a language other than English. Those employees receive additional compensation for demonstrating non-English language proficiency and can assist the LACDA.

## VII The Language Access Plan (LAP)

The LACDA has prepared its LAP to identify the needs of the LEP population who have or will be served by one of our housing assistance programs. In compliance with federal regulations, the LACDA will make reasonable efforts to provided language assistance for its LEP population, across all its programs, who need assistance in understanding program policies and announcements that would prevent them from meaningful access and enjoyment its programs.

### Language Assistance Measures

The LACDA provides both oral and written translation services for their Housing Assistance LEP participants and applicants of vital program documents. Other program documents not directly related to the LACDA housing programs or not likely to affect someone’s housing are considered non-vital documents and information.

### Written Interpretation Services

In accordance with the Four Factor Analysis, the LACDA has translated the documents that are vital to meaningful access and enjoyment for its Spanish LEP population. Translation of vital documents into another language other than Spanish will be translated upon request. Non-vital documents and information will also be translated upon request.

### Oral Interpretation Services

The LACDA has a staff of capable translators who are able to handling written and oral translations in Eastern Armenian, Armenian, Spanish, Russian, Chinese-Mandarin and Vietnamese. For other languages, the LACDA can arrange for an interpreter to assist applicant or participant, upon request. These interpretations can be handled in person, virtually, or over the phone.

<b>Interpreters Unlimited Fees</b>				
<b>Section 1: Translation Services</b>				
<b>Language</b>	<b>Unit Cost Per Word</b>			
Spanish	\$0.13			
Russian	\$0.13			
Chinese (Simplified)	\$0.13			
Chinese (Traditional)	\$0.13			
24 Hour Rush Service Request	\$0.00			
Translation Minimum Charge	\$74.65			
<b>Section II: Interpretation Services</b>				

Language	Minimum No. of Hours	Hourly Rate		
Spanish	2	\$74.00		
Russian	2	\$104.00		
Korean	2	\$104.00		
Chinese (Cantonese)	2	\$104.00		
Chinese (Mandarin)	2	\$104.00		
Vietnamese	2	\$104.00		
Armenian	2	\$104.00		
Tagalog	2	\$104.00		
Dutch	2	\$104.00		
Japanese	2	\$104.00		
Cambodian	2	\$104.00		
<b>Section III: Other Interpreting Services</b>				
Description	Minimum No. of Hours	Rate Per Hour	Pre Minute Rate	
In-Person Sign Language: American Sign Language (ASL)	2	\$95.00		
In-Person Sign Language: Signed Exact English (SEE)	2	\$95.00		
Video Remote Sign Language: American Sign Language (ASL)	0		\$1.25	
Video Remote Sign Language: Signed Exact English (SEE)	0		\$1.25	
Description	Minimum Charge	Per Page Rate		
Written Braille Services (this includes delivery of an electronic Braille file)	\$75.00	\$75.00		
Written Braille Services (this includes delivery of an embossed hard copy)	\$75.00	\$75.00		
<b>Written Braille Services</b>	<b>Unified English Braille Format</b>	<b>English Braille American Edition</b>		
	\$75.00	\$75.00		
<b>Written Braille Rush Services</b>	\$75.00	\$75.00		
Description	Minimum No. of Minutes	Per Minute Rate		
<b>Over the Phone Interpretation Services:</b>				



Spanish	0	\$1.20		
Russian	0	\$1.20		
Korean	0	\$1.20		
Chinese (Cantonese)	0	\$1.20		
Chinese (Mandarin)	0	\$1.20		
Vietnamese	0	\$1.20		
Armenian	0	\$1.20		
Tagalog	0	\$1.20		
Dutch	0	\$1.20		
Japanese	0	\$1.20		
Cambodian	0	\$1.20		
Video Remote Interpretation Services:				
Spanish	0	\$125.00		
Russian	0	\$125.00		
Korean	0	\$125.00		
Chinese (Cantonese)	0	\$125.00		
Chinese (Mandarin)	0	\$125.00		
Vietnamese	0	\$125.00		
Armenian	0	\$125.00		
Tagalog	0	\$125.00		
Dutch	0	\$125.00		
Japanese	0	\$125.00		
Cambodian	0	\$125.00		

**Cancellation Fees**

Description	Charge Per Cancellation			
48 Hour cancellation notification prior to the start of a scheduled assignment (during business hours)	No Charge			
24 Hour cancellation notification prior to the start of a scheduled assignment (during business hours)	50% of Total Charge			
Cancellation notification on the day of the scheduled assignment	100% of Total Charge			

**Focus Language International, Inc.**

**Section 1: Translation Services**

Language	Unit Cost Per Word			
Spanish	\$0.10			
Russian	\$0.14			

Korean	\$0.11			
Chinese (Simplified)	\$0.12			
Chinese (Traditional)	\$0.12			
24 Hour Rush Service Request	\$0.16			
Translation Minimum Charge	\$65.00			
<b>Section II: Interpretation Services</b>				
<b>Language</b>	<b>Minimum No. of Hours</b>	<b>Hourly Rate</b>		
Spanish	2	\$65.00		
Russian	2	\$115.00		
Korean	2	\$115.00		
Chinese (Cantonese)	2	\$115.00		
Chinese (Mandarin)	2	\$115.00		
Vietnamese	2	\$90.00		
Armenian	2	\$90.00		
Tagalog	2	\$90.00		
Dutch	2	\$70.00		
Japanese	2	\$90.00		
Cambodian	2	\$125.00		
<b>Section III: Other Interpreting Services</b>				
<b>Description</b>	<b>Minimum No. of Hours</b>	<b>Rate Per Hour</b>	<b>Pre Minute Rate</b>	
In-Person Sign Language: American Sign Language (ASL)	2	\$90.00		
In-Person Sign Language: Signed Exact English (SEE)	2	\$95.00		

Video Remote Sign Language: American Sign Language (ASL)	0		\$1.25
Video Remote Sign Language: Signed Exact English (SEE)	0		\$1.35
<b>Description</b>	<b>Minimum Charge</b>	<b>Per Page Rate</b>	
Written Braille Services (this includes delivery of an electronic Braille file)	\$75.00	\$1.90	
Written Braille Services (this includes delivery of an embossed hard copy)	\$75.00	\$1.90	
<b>Written Braille Services</b>	<b>Unified English Braille Format</b>	<b>English Braille American Edition</b>	

	\$0.55 Per Word	\$0.55 Per Word		
<b>Written Braille Rush Services</b>	No Cost			
<b>Description</b>	<b>Minimum No. of Minutes</b>	<b>Per Minute Rate</b>		
<b>Over the Phone Interpretation Services:</b>				
Spanish	0	\$0.90		
Russian	0	\$1.25		
Korean	0	\$1.25		
Chinese (Cantonese)	0	\$1.25		
Chinese (Mandarin)	0	\$1.25		
Vietnamese	0	\$1.25		
Armenian	0	\$1.35		
Tagalog	0	\$1.35		
Dutch	0	\$1.35		
Japanese	0	\$1.35		
Cambodian	0	\$1.35		
<b>Video Remote Interpretation Services:</b>				
Spanish	0	\$2.25		
Russian	0	\$2.25		
Korean	0	\$2.25		
Chinese (Cantonese)	0	\$2.25		
Chinese (Mandarin)	0	\$2.25		
Vietnamese	0	\$2.35		
Armenian	0	\$2.35		
Tagalog	0	\$2.35		
Dutch	0	\$2.35		
Japanese	0	\$2.35		
Cambodian	0	\$2.35		
<b>Cancellation Fees</b>				
<b>Description</b>	<b>Charge Per Cancellation</b>			

<p>48 Hour cancellation notification prior to the start of a scheduled assignment (during business hours)</p>	<p>No Charge</p>			
<p>24 Hour cancellation notification prior to the start of a scheduled assignment (during business hours)</p>	<p>50% of Total Charge</p>			
<p>Cancellation notification on the day of the scheduled assignment</p>	<p>100% of Total Charge</p>			