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SECTION 1: OVERVIEW & CONTEXT

Department Mission

We Build Better Lives & Better Neighborhoods

The LACDA provides innovative programs that position the agency to end generational poverty and homelessness, encourage community development, and empower Los Angeles County residents and businesses to reach their full potential. To assist them in reaching their goals, the LACDA makes a diligent effort to accommodate the language access needs of the County's non- or limited-English population through translation and interpretation tools and services that improve the agency's ability to effectively communicate and improve comprehension of the programs and services it administers.

Department Priority Languages

Although requirements may differ for specific LACDA-administered program areas, the agency has identified the following as the most common language assistance requests and are considered its priority languages.

Spanish, Chinese, Russian, Armenian, and Korean

This determination was made by establishing a baseline pursuant to applicable State and Federal regulations and policies that govern language access including:

- (Federal) Title VI, 42 U.S.C. § 2000d et seq. (Title VI of the Civil Rights Act of 1964)
- (Federal) 24 CFR 570.441(b)(4) Citizen participation — Insular Areas
- (Federal) Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” and the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin

Discrimination Affecting Limited English Proficient (LEP) Persons published in the Federal Register on January 22, 2007

- (Federal) Section 504 of the Rehabilitation Act (Braille)
- (State) Dymally-Alatorre Bilingual Services Act
- (State) California Civil Rights Act

The LACDA also utilized data from the 2021 U.S. Census Bureau's American Community Survey which reported on the percentages of the population who identified themselves as speaking English "less than very well." The LACDA then analyzed the key client populations that frequently request language assistance and resident demographics for specific public and affordable housing developments to make its final priority language determination.

SECTION 2: DEPARTMENT'S LANGUAGE ACCESS POLICY

PURPOSE

The LACDA understands that removing language barriers is critical to achieving equitable access to services and resources. The agency is committed to taking reasonable steps to ensure that non- or limited-English speaking individuals have meaningful access to agency activities and programs. The LACDA is committed to providing language assistance that is accurate, timely, and effective at no cost to the County's Language Other Than English (LOTE) speakers.

The LACDA will routinely assess agency operations to identify opportunities to improve language access accommodations in accordance with Federal, State, and local guidance.

The Office of Public Affairs and Communications (OPAC) is responsible for periodically reviewing this policy and working in partnership with the LACDA Division Language Access Representatives to identify and incorporate policy changes as approved by the Executive Director or his/her designee.

SCOPE OF THE POLICY

This Language Access Policy applies to all LACDA employees, interns, and volunteers who interact with the public or produce public-facing materials. It ensures that individuals who speak a LOTE can fully access and participate in LACDA services, programs, and activities.

KEY TERMS AND DEFINITIONS

Language Other Than English (LOTE): Also known as Limited English Proficiency (LEP) or English Language Learner (ELL); this designation refers to individuals who do not speak English as their primary language and who do not read, write, or speak English.

Preferred Language: The primary language in which an individual prefers to read, write, and speak.

Interpretation: Rendering spoken or signed language into another language while maintaining the meaning and tone of the language.

Translation: Rendering written communication into another language while preserving meaning.

Vital Documents: Documents that affect enrollment, continued participation, or termination from a County program, benefit, or service.

Language Access: The provision of free interpretation or translation to LOTE speakers in their preferred language to help enable reasonable access to fully participate in the services, resources, and programs administered by the LACDA.

Language Access Complaint: A formal statement or grievance that outlines, for example, insufficient language services offered, language services not provided when requested, or an inadequate quality of language services, any of which did not meet the needs of the LOTE speaker.

Priority Languages: The languages the LACDA has identified as most valuable to its program audience based on U.S. Census demographics, local audience population data, patterns in service use and language requests, and feedback from internal service providers on the languages most used/requested in their programs.

Language Access Representatives: An employee of the LACDA selected to facilitate Language Access data requests, complaints, and inquiries related to their respective Division/Unit/Office program or service area.

LANGUAGE ACCESS PROCEDURES

(A) Identifying Language Preferences

The LACDA's employees, interns, and volunteers will implement the following practices, as appropriate, to identify a LOTE speaker's preferred language:

- Asking program applicants at the time of application and during annual reviews/recertifications to identify their primary language for both oral and written services, and whether translation or interpretation services are needed.
- Issuing U.S. Census "I Speak Cards" in program application packets to help identify preferred languages.

- Including questions regarding the applicant's preferred language (written/oral) in online portals.
- Providing available resources to guests that self-identify as LOTE speakers during office walk-ins when requesting language assistance.
- Training office staff to identify language challenges during client interaction and offering to provide language assistance even when client does not initiate the request.
- Including an option for LOTE speakers to request an interpreter in advance of public meetings.

This list outlines available options that may not be suitable for all public interactions. It is at the discretion of each program to use the most appropriate resources to best serve its audience.

(B) Access to Vital Documents

The following categories have been determined to include vital documents necessary for continued participation in, or used in the termination from, an LACDA benefit or program. This list is not exhaustive and may vary by program area:

- *Subsidized Housing Programs*
 - Applications/Reexaminations/Terminations/Consents
 - Accommodation Requests/Eligibility Documents/Leases/Flyers/Program Changes and Announcements
- *Community Development*
 - Applications/Briefing Packets/Community Meeting Outreach
- *Home Ownership/Home Improvement Programs*
 - Applications/Flyers

The LACDA shall determine prioritization for most crucial vital documents.

(C) Use of Untrained Interpreters

Upon the request of the LOTE speaker, the LACDA will allow for informal interpreters such as family members, friends, legal guardians, service representatives, or advocates to assist with language access needs.

NOTIFICATION OF LANGUAGE ASSISTANCE

The LACDA makes meaningful efforts to advise the public of available language access services, including, but not limited to:

- Advising applicants of the available language access services and asked at the time of application, using written questions located within the application to designate their primary language for both oral and written services and whether LEP services are needed.
- Reconfirming language preferences at the time of annual reexamination.
- Advertising language access services through postings on the LACDA's website, public and affordable housing management office lobbies, online portals, Administrative Offices, and during public comment period noticing.
- Distributing electronic and telephonic mass messaging in languages targeted to specific housing population's needs.

EVALUATING THE LACDA'S LANGUAGE ASSISTANCE EFFECTIVENESS

Monitoring Service Delivery

The LACDA will routinely review all language assistance requests, including the primary languages requested, service(s) provided (e.g., interpretation, translation), and points of contact (in-person, virtual, or phone). This data will help assess the linguistic communities served and identify where service gaps may exist.

Surveying Staff Members

The LACDA will conduct an annual survey of staff members on their use of language assistance services, suggestions, issues and challenges, and efficacy of the resources and tools available.

LANGUAGE ACCESS COMPLAINTS

Complaint Process

The LACDA is committed to providing culturally and linguistically appropriate services for all County residents. If a member of the public feels their language access needs were not met during an encounter with the LACDA, a written complaint may be submitted via the agency's [Language Access Complaint Form](#).

Acknowledgment

The LACDA will acknowledge receipt of a complaint in writing within 10 business days. The acknowledgment will be sent in the complainant's preferred language.

Review and Resolution

Complaints will be reviewed by the LACDA's Language Access Liaison, who will forward to the appropriate Language Access Representative for further investigation, if needed. The agency will aim to resolve and provide a formal response to the complaint within 90 business days.

Outcome

Complainants will be notified in writing of the findings and any actions taken to address the issue. Communication will be sent in the complainant's preferred language.

COMMUNITY OUTREACH AND ENGAGEMENT

The LACDA considers the linguistic needs of the various populations served and makes reasonable efforts to ensure LOTE-speaking individuals have meaningful access to agency activities and programs. This includes adjusting the scope of translations/interpretations to address specialized needs in certain geographical areas and having adequate third-party resources available to be able to accommodate any specialized language requests.

EXCEPTIONS TO THIS POLICY

The policy is intended to improve the internal management language accessibility procedures and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the LACDA, County of Los Angeles, its Special Districts, Elected Officials, Officers, Agents, Employees, Volunteers, or any person. This policy is not intended to be cited in any judicial or administrative proceeding. Administration of the services and programs discussed herein is within the sole discretion of the LACDA.

At the discretion of the Executive Director or his/her designee, procedures in this policy may be changed to ensure efficiency and to comply with legal and other requirements.