Language Access Plan (2023)

City of San José Housing Department

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VISION

All persons in San José, including those whose primary language is not English, can feel a sense of belonging and receive excellent service from the Housing Department. The Department welcomes cultural changes, values language diversity, and strives to ensure monolingual persons have meaningful and equal access to programs, activities, and services that enrich lives.

INTRODUCTION

Languages embody the knowledge, traditions, and heritage that form the cultural fabric of communities. The City of San José has a rich multicultural history with the long-time presence of many prominent languages. This trait has grown as San José has become an increasingly diverse and global city.

San José has undergone many changes over the last 60 years. The City began as a small community of farms and orchards supporting an urban downtown with walkable neighborhoods, and rapidly grew during the 60's and 70's as one of the fastest growing cities in the nation. This growth has transformed San José into the urban center of Silicon Valley and the 10th largest city in the country.

A wealth of languages from all-across the world are spoken in San José. According to 2021 Census data, 26 different languages are commonly spoken in San José and 60% of San José residents speak a language other than English at home. Many individuals living in the City whose primary language is not English may have limited English proficiency (LEP).

However, the City has long-practiced providing services primarily or solely in English. Due to this practice, the Housing Department has been traditionally disconnected from many San José households. For example, the Department has few communications and social networks to connect LEP individuals to housing services and programs. Once connected to the programs, staff may not be adequately prepared to provide the same quality service or important information to LEP residents as they do for English-proficient residents. LEP residents may not understand the details of programs or applicable legal responsibilities due to these linguistic barriers.

LEP individuals may encounter significant barriers to housing programs and services for these and other reasons. Title VI of the Civil Rights Act of 1964 requires organizations whose programs are federally funded to ensure meaningful access to these programs. Failure to ensure that LEP persons have "meaningful access" to federally funded programs may violate Title VI anti-discrimination regulations.

This LAP sets forth a framework of the language services and procedures that the Housing Department will implement to provide fair access and excellent quality services for LEP

persons through the Department's programs and grantee organizations. The LAP follows guidelines issued by HUD to meet Title VI requirements.

The Department also acknowledges the HUD four-factor analysis and safe harbor provision utilized in this LAP may not be sufficient to accomplish the Department's commitment to fair and equitable services for the City's LEP communities and persons with disabilities. This LAP is critical and related to equity and emergency communications.[1]

Housing Department staff who developed this updated Language Access Plan thank the LEP persons, LEP and disabled serving non-profits, and Department staff who participated in this process to update this Language Access Plan. The team hosted focus groups, tabled local festivals and events, engaged with ethnic medias, conducted interviews with CBOs, and disseminated an online and paper survey in nine different languages through community centers, email listservs, and social media. The insights gleaned from their experiences and expertise has been invaluable.

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[1] The Department's process to identify these other in-demand languages is further described in Appendix G.

DEFINITIONS

- **Bilingual:** the ability to speak two languages. The individual can communicate directly and accurately in both languages.

- **In-Language Communication:** monolingual conversation in a language other than English between a qualified bilingual Department employee or representative and an LEP individual (e.g., Spanish to Spanish).

- **Interpretation:** Converting communication in one language (source language) to another (target language) while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training and should not be confused with being bilingual. Interpretation may be provided orally, visually, or tactilely. Examples include interpretation from English to Spanish, from ASL to English, and interpretation from ASL to protactile (a touch-based communication used by some people who are deaf-blind).

- **Level of Proficiency:** Describes an individual's comprehension of a language in terms of communicating in real-world situations in a spontaneous and non-rehearsed context.

- **Limited English Proficiency (LEP):** individuals whose primary language is not English and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). Similarly, LEP designations are context-specific; an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other situations. LEP includes American Sign Language.

- **Multilingual:** the ability to speak in 2 or more languages. The individual can communicate directly and accurately in both languages.

- **Primary Language:** the language in which an individual prefers to communicate in.

- **Translation:** replacing written text from one language (source language) with equivalent written text in another (target language). Translation requires special knowledge and skills.

- **Transcreation:** The recreation of written text from one language (source language) to written text in another (target language). This requires proficiency in both

languages and communication knowledge of the targeted language audience. Transcreation differs from translation in that translation is a direct word for word from one language to another. Transcreation is crafting the main text into another language that is created in that language for that language. Experience has shown word for word translation is not a seamless method to create messaging in one language and duplicate it in another.

- **Vital Documents:** documents that contain essential information about available programs, services, and benefits, access to which is essential to receive them, benefit from them, or participate meaningfully in them. This also includes emergency notifications.

SUMMARY

This report provides the framework for how the City of San José Housing Department and subrecipients of federal funding can provide fair access to programs, policies, and services for persons with limited English proficiency (LEP). The creation of this LAP also responds to a voluntary compliance agreement (VCA) entered between the City of San José and the federal Department of Housing and Urban Development (HUD) on July 1, 2007 to ensure that LEP individuals have meaningful access to housing and community development information which may impact their lives.

Four Factor Analysis

HUD recommends utilizing a "four factor" analysis to determine the LEP population to serve and the level language services to provide. This analysis is required of the City of San José and all sub-recipients of HUD funding.

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
- Factor 2: The frequency that LEP persons access the program
- Factor 3: The nature and importance of the program, activity, or service provided by the program to peoples' lives.
- Factor 4: The resources available to the grantee/recipient and costs.

In particular, the four-factor analysis guides multilingual department employees on which documents must be provided in languages other than English. This analysis shows the Department should automatically provide interpretation and translation of vital documents in Spanish, Vietnamese, and Chinese. However, in many instances the Department should provide information in additional languages. Nevertheless, the Department recognizes that other monolingual speakers reside in San Jose and strives to connect with these populations.

Guidance for Multilingual Employees

This LAP provides information for multilingual employees who seek to use their non-English language skills as part of their job expectations. This section describes the certification process for bilingual pay, expectations, and job duties. This section describes the roles and responsibilities of the department Language Access Coordinator, Language Access Leads, and managers of multilingual employees.

Procedures for Language Access and Staff Training

All Housing Department employees will be trained on the procedures to be used for providing service to LEP persons. The procedures outlined in this LAP include guidance for everyday language access tasks ranging from in-person interpretation, community presentations, ethnic media requests, and more.

The Department will provide multiple pieces of trainings on the LAP through live webinars and on-demand videos. The all-staff trainings will focus on the importance of language access, how to use language access tools, and how to contract with language vendors. There will also be specialized training for Department staff who speak another language besides English to prepare them to use their language abilities on the job.

Marketing and Communications

All employees are responsible for incorporating multilingual communications strategies as part of their project workplans to ensure outreach efforts to LEP persons are met.

To properly communicate services to the public, ample time is needed to translate, create, and distribute the information to residents. The Housing Department did not have a public information team for several years following the Great Recession due to limited funding, resources, and budget cuts. In 2018, the Housing Department reestablished the communications budget and created an internal communications team.

Since the team was established, they have been instrumental to expand both the Housing Department's communication and the Office of Emergency Response (OER) through the City Manager's Office (CMO) emergency pandemic communications with LEP communities. Certain language groups have been under-represented seeking Housing Department services, not because they do not have demand for them, but because they

are not aware the services exists and/or may be provided in their primary language. In the language access outreach survey, most of those surveyed did not know about all the services the Department had to offer. We will be actively bridging the gap between LEP persons and City Housing services using this updated marketing and communications process.

Working with Sub-Recipients of Federal Funding

Each community-based organization (CBO) that receives HUD funding via the Housing Department must develop its LAP based on the four-factor analysis. The Housing Department collaborated with these CBOs throughout 2008 to help them develop their plan. The Department recognizes that CBOs may benefit from technical assistance to update their plans to meet current needs. The Department will support grantees with keeping their Language Access Plans up to date as part of contract oversight.

Monitoring and Updating the Language Access Plan

Collecting, analyzing, and maintaining data is one way the Housing Department and CBOs may assess the efficacy of their LAP's.

The Department and CBOs will review their LAP annually to determine its current effectiveness and to analyze any changes in LEP populations or needs. The Department' Language Access Coordinator will coordinate the Department's Language Access Plan review. The Housing Department Grants team will monitor LAP and ADA compliance as part of regularly scheduled contract negotiations, renewals, and site visits.

4 FACTOR ANALYSIS TO DETERMINE LANGUAGE THE SERVICES NEEDED

This section contains the City of San José four-factor analysis to meet the requirements of Title VI of the Civil Rights Act of 1964. This pertains to the City of San José Housing Department and all sub-recipients of HUD funding.

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

This report defines the eligible population or beneficiaries of a LAP all community members within the City of San José jurisdiction. This definition recognizes that the City has extraordinary diversity in a region where high housing costs make housing services critical for LEP persons. The HUD safe harbor provision used in this LAP is "more than 5 percent of the eligible population or beneficiaries and more than 50 in number."

Identifying LEP Persons Who Need Assistance

According to 2021 Census data[2] the three language groups representing more than 5% of the San José population are Spanish, Vietnamese, and Chinese. For the LAP, "Chinese" will refer to both Mandarin and Cantonese languages, as well as the written Chinese Traditional[3] It is essential to note that English speaking does not represent English literate.

In many instances, the Department should provide information in additional languages beyond those which qualify through the 5% test. Particular consideration should be given toward other languages groups of which there are more than 5000 speakers who speak

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[2] ACS 1-year 2021, Table B16001: Language spoken at home by ability to speak English for the population 5 years and over

[3] 3 There are 22 language groups with more than 1000 speakers in San José. For this list, please refer to the Appendix E.

English less than "very well" and those which are disproportionately impacted by housing issues. As of 2021, language groups of which there are more than 5000 speakers who speak English less than "very well" include Tagalog and Korean.

Housing Department will also make intentional efforts to expand language access for African Ancestry communities. This determination is based on data which shows the African Ancestry community experiences the highest rates of Housing Burden in San José (66%), alongside the Vietnamese community.[4] The Black/African American community also experiences disproportionately high rates of homelessness.[5] Whereas Black/African Americans comprise 2% of the general Santa Clara County population, they comprise 16.9% of the County's homeless population.

The most spoken non-English languages of the African Ancestry communities in San José include Yoruba, Oromo, Amharic, Igbo, and Tigrinya. Of these, census data and conversations with non-profit workers who work primarily with the African Ancestry community suggest Amharic is the most spoken language, followed by Tigrinya. Limited English Proficient residents of African Ancestry in San José are most likely to be of Ethiopian descent. Thus, staff recommends that the Housing Department develop a strategic communications plan for the African Ancestry community.

It is also Housing staff's recommendation that communications during emergency situations be expanded to include additional languages beyond the those which qualify through the 5% test, such as languages with more than 5000 speakers. This is due to the urgent importance of emergency communications to the immediate safety and wellbeing of residents.

In recent years, San Jose has been impacted by the Coyote Creek Flood in 2017, annual wildfires, and COVID-19 Pandemic in 2020. These emergency situations highly impacted communities of color and many residents whose primary languages were not English.

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[4] The housing burden analysis described here is provided in **Appendix G.**

[5] Race and Homelessness in Santa Clara County (2020) | https://destinationhomesv.org/race-homelessness-in-santa-clara-county/

Therefore, it is important for the Department fully consider the language access needs of the communities who are at risk during these emergencies.

The Housing Department plans to move toward using a higher HUD safe harbor provision in the future which recommends all vital translated documents are provided for language groups which represent 1,000 or more in the eligible population in the market area or among current beneficiaries. A list of these languages is provided in Appendix E.

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

The Housing Department's Rent Stabilization Program and the Eviction Prevention Help Center Program are the department's most frequently accessed programs. Attributed to this factor is that 95% of both Programs' staff are bilingual and there is community outreach component where staff provides monolingual, bilingual and tri-lingual presentations and services to individuals requesting assistance. In addition, the program has target goals to staff resource tables and participate in community events.

Frequency of contact with Housing Department programs by LEP persons cannot be measured because data does not exist. This report recommends that language access data gathering occur in all department divisions. This can be used to quantify frequency of contacts and trends in service needs. Follow up quality assurance surveys will be used to gather feedback on the Department's language services as part of this LAP.

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

The nature and importance of nearly all Housing Department programs and services are often critically important to San José residents. However, some department business is more important to residents' lives than others.

For example, the Rent Stabilization Program is a cost recovery program that administers rent control in San Jose to certain housing stock; three units of more built before September 7, 1979. This Program increases housing stability and prevents potential instances of homelessness by regulating rent increase spikes not to exceed 5% in a 12-month period and unjust evictions. Ensuring multilingual communications related to the

Rent Stabilization Program or emergency notices may be more critical than translating grant reporting documents.

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

The Department has created a concerted effort to expand language access. Additional resources have been allocated in recent years to provide new services in-language for LEP persons including expanding the use of professional language firms, hiring multilingual employees, and developing new Language Access staff training.

To assess the organizational resources available to the Housing Department, the LAP accounts for both people and fiscal resources for verbal and written language services.

Oral Interpretation: Oral interpretation may be required when LEP residents call the department, visit for in-person services, or attend Housing Department meetings. The Department currently employs 21 people who are multilingual with varying levels of fluency in languages other than English. Nine of the department's multilingual employees work with LEP residents daily, three employees work with LEP residents several times a week, and five employees work with LEP residents occasionally. 13 of these employees receive differential pay specifically related to their ability to speak a non-English language. The languages represented among employees who receive bilingual pay include Spanish, Vietnamese, Chinese, and Tagalog.

The Housing Department allocates funding for language vendors to increase the department's ability to provide oral services in non-English languages. If the Housing Department cannot meet the language needs of an LEP resident, staff are directed to use an approved phone interpretation service.

This list of language vendors the Department funds can be found in **Appendix L**. It is the department's assessment that with effective staff training, there are sufficient financial resources to meet the oral interpretation needs of LEP residents now and in the future.

Written Translation: Translated documents are often requested by LEP residents. Written translation typically costs 20 to 40 cents per word with a minimum of 300 words, providing

staff resources to review translations, as well as the cost of printing the translated documents.

The Department uses outside vendors to provide written translation services for lengthy documents and will continue to outsource this task according to this LAP. Multilingual staff review these translations for accuracy and readability.

The Document Assessment Process in this LAP presents a framework for internally assessing and prioritizing which Housing Department documents should receive written translation. Although the four-factor analysis identifies Spanish, Vietnamese, and Chinese as the primary language groups according to HUD's safe harbor provisions, it does not automatically follow that all documents will be translated in all three languages, nor does it mean that these are the only languages that should be considered for translation.

Housing Department employees should consider other factors when determining translation needs. For example, programs specifically for residents who may be LEP persons and are not Spanish, Vietnamese, or Chinese speaking should be conducted in the necessary language. Staff may also refer to the City's Language Map[6] shows which languages are most spoken in different San José neighborhoods in **Appendix H**. Additionally, ASL translation or CART services should be considered for all events and materials that may not be accessible by Deaf or hard-of-hearing residents.

It is noted that the demand for translation services may be higher than what is perceived by the department due to residents' unawareness of the City's translation policies and services. Additionally, some documents are rarely or never accessed by any group.

The Department's professional services budget has been sufficient to fund translations as needed for the last two fiscal years. However, the Department is monitoring the cost of translating all documents as the City's language access grows and our population diversifies.

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[6] 2021 ACS 5-Year Estimates

COMMUNITY ENGAGEMENT SUMMARY

This section describes the community engagement conducted to develop this Language Access Plan. The team began with setting response goals, identifying and engaging key outreach partners early, and syncing the outreach calendar with popular community events to meet LEP communities where they already gather.

The community engagement process incorporated pop-up tabling at local festivals, a flag raising, and existing community meetings. The team hosted focus groups, engaged with ethnic media, conducted interviews with CBOs, and disseminated an online and paper survey in nine different languages through community centers, email listservs, and social media. The team also engaged with LEP persons in their primary language when possible.

Table A: Community Engagement Summary

Pop up Tabling	Focus Groups	Media	Interviews	Email Listserves
- Viva Calle - Black April Flag Rasing - Juneteenth Festival - Project Hope Sites - Vietnamese American Community Center - Eviction Prevention Help Center	- Taiwanese American Cultural Center - Eastside PEACE Anti-displacement working group - Silicon Valley Independent Living Center	- Ha Van radio show - Filipino TVRadyo	- Nguyen Plan (Vietnamese American Roundtable) - Victor Vasquez (SOMOS Mayfair) - Alice Turner (Vista Center) - Fatimah Currimbhoy (DCARA) - Maarnet Gebremariam (Roots Community Health Center)	- API Justice Coalition - Si Se Puede Collective - LEAD Filipino

Some common themes from the community engagement process include:

- Most respondents are unaware of Housing Department programs or the Housing Department in general. Less than half of all respondents were able to recognize one Housing Department program
- LEP respondents have a strong preference for printed materials
- Respondents emphasized a trustworthy messenger is arguably as important as the message
- They encouraged Housing Department staff to "get out of City Hall" and stated communication is a two-way street
- Visuals and images help with those who do not read very well
- Messages would be better crafted in-language rather than translated because the tone of translated messages can be cold and uninviting
- Respondents shared a preference for both short & long detailed versions of documents, not just one version
- Vast majority of respondents prefer bilingual documents. LEP residents prefer to see English and their primary language on the same document
- Some found typos and miswording in example flyers. There is need to increase consistency and quality of the Department's written communication in languages other than English
- Most said they want help finding affordable housing
- They responded with wanting to receive more information from the Housing Department in general because they believe the information is important
- Many people appreciated the existing City efforts to communicate in their language and this LAP survey

Staff collected a total of 387 surveys from LEP and bilingual residents. While all surveys showed overall low comprehension of Housing Department communications, this is especially true for Vietnamese survey respondents. About 3 in 4 Vietnamese survey respondents stated they understand 25% or less of the information they receive from the Housing Department. This comparatively low comprehension rate may point to why nearly half of respondents to the Spanish survey were aware of at least one Housing Department program as compared to less than 20% of Vietnamese respondents. This can also be compared to about 4 in 5 Tagalog survey respondents who stated they understand 75% or all the information they receive from the Housing Department.

The Department received most surveys from Spanish speaking and Vietnamese speaking respondents. However, the low response to some language surveys was not assumed to indicate a lack of interest or a low-level of need. For example, some communities may have a lower response rate due to the Department having few existing relationships in these communities.

It will be necessary for staff to develop relationships with these communities understand better and reach their housing needs. Other outreach activities such as focus groups and interviews were able to provide detail of the language barriers experienced by these other groups.

Housing Department Staff Surveys and Focus Groups

The Housing Department conducted a Language Access Staff Survey and a focus group with multilingual staff. The survey included questions about the frequency of their interactions with LEP and/or disabled residents, their verbal and writing abilities in languages other than English, and recommendations for increasing language access in the Department. Nearly half of Housing Department employees responded to the survey (n=45).

While all responses were informative, the most notable responses were related to negative LEP interactions. The results are described in the bar chart below:

Negative LEP Customer Interactions										
	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%
Where a colleague was asked to stop performing job duties to interpret and/or translate for another staff	69%									
Housing department videos that do not include written transcripts for those who are hearing impaired	28%									
Flyers and images were posted on the Housing department website without alternative tags and captions	21%									
Housing department information was provided in small font and colors were difficult to read	34%									

Where residents attended a public meeting and no interpretation services were available in their primary language	**45%**							
Clients who were turned away from a service due to lack of language accessibility in their primary language	**31%**							
Requests for documents that were unavailable in the customer's primary language	**59%**							
Last minute translation requests	**90%**							
Last minute interpretation requests	**76%**							

Unfortunately, the survey highlighted instances when staff has witnessed the Housing Department fall short in providing quality service to LEP persons. 31% of staff respondents have witnessed a LEP resident being turned away from service due to language barriers. 45% have witnessed LEP residents attend community meetings where interpretation was not available in their primary language.

Some feedback was internal process related. 90% of respondents stated they have experienced or witnessed last minute translation requests. 69% of respondents state they have experienced or witnessed multilingual employees stopped from performing their regular job duties to assist a colleague with an LEP resident. Some multilingual staff also stated during the focus group they were asked to translate or interpret in a variety of situations regardless of the difficulty of the task and whether they acquired language certification or bilingual pay.

The findings above point to areas of improvement for the Housing Department. The LAP Team utilized this valuable feedback into the design of this document to improve language access in the Department.

MULTILINGUAL EMPLOYEES

Bilingual Pay

The City recognizes the value of employees who can communicate with residents in languages other than English and provides additional pay to eligible employees with these skills.

Requests for bilingual pay are made by the Department and reviewed by Human Resources. The Department may request the bilingual pay differential for an employee based on the employee's use of a non-English language as part of their regular job duties. Regular job duties mean the non-English language is used on the job on a regular, on-going basis. For example, four (4) or more times per month on average, one or more times per week on average, etc.

The bilingual pay rate is determined through contract negotiations with the unions. Most Housing Department employees are represented by the Municipal Employee Federation (MEF) and the City Association of Management Personnel (CAMP/IFPTE). The bilingual pay rate is the same for both MEF and CAMP. The rate in the 2021-2023 contract is below:

- Each full-time employee who meets eligibility requirements shall be compensated for performing oral communication or sign language duties at the rate of twenty-nine dollars ($29) per biweekly pay period or for performing written and oral translation duties at the rate of forty dollars ($40) per biweekly pay period
- Each part-time benefited employee who meets eligibility requirements shall be compensated for performing oral communication or sign language duties at the rate of nineteen dollars ($19) per biweekly pay period or for performing written and oral translation duties at the rate of thirty dollars ($30) per biweekly pay period
- Each part-time unbenefited employee who meets the eligibility requirements shall be compensated for performing oral communication, sign language duties, or performing oral translation duties at the rate of fifteen cents ($.15) per hour.

If an eligible employee is on paid leave for a period of one full pay period on more, the employee will not receive bilingual pay for that period. If an employee is denied bilingual pay, the employee may appeal in writing to the Department Director for reconsideration. If the employee is dissatisfied with the decision of the Department Director, or designee, the employee may apply in writing for reconsideration with the Director of Human Resources.

The written decision of the Director of Human Resources shall be final, with no process for further appeal.

In the past, some Multilingual employees have been assigned language access related tasks in addition to their regular job duties regardless of whether they passed the necessary exams to receive differential pay.

Multilingual employees who did not pass the necessary exams to receive differential pay are discouraged from providing services in languages other than English.

To get certified for bilingual pay, please reach out to your manager for more information.

When to take the Language Certification Test

In cases where the job requires a bilingual speaker, hired candidates must take and pass the language certification test within 60 days of hire. This requirement will be clear within the job description. Candidates who are hired to these positions will continue to be evaluated on the job during the probation period.

Taking the Language Certification Test is optional for City staff who are hired into positions which do not require bilingual abilities. All Housing staff are informed about potential Bilingual pay opportunities during the employee onboarding process due to the outstanding need for bilingual workers. Staff who voluntarily seek bilingual pay may opt to take the Language Certification Test at anytime. If these staff do not pass the test the first time, they are encouraged to continue to study and retake the test.

Language Access During Emergency Operations

Under the California Government Code, all employees (who are not already in public safety fields like police or fire) are obligated to serve as Disaster Service Workers. Disaster Service Workers provide services and aid during conditions, including the recovery phase, of an emergency, disaster, or catastrophic event.

City employees, including employees of the Housing Department, are required to perform duties as a Disaster Service Worker when the City Manager or the City Council declare the existence of or threatened existence of a local emergency.[7]

Employees may be required to do the following:

- Work in assignments based on the needs of the work unit and/or the City that may require employees to serve at locations, times, and in conditions other than their normal work assignment and/or schedule;
- Work in assignments outside the general scope of their typical duties and responsibilities.
- Employees will never be asked to perform any duty or function they are physically unable or unqualified to do; and
- Work for a supervisor, division, or department different from their normal work assignment.

Some multilingual staff may be activated as disaster service workers in roles which require their language abilities, such as part of the Emergency Public Information Office. Individual staff are chosen by Housing Department management to serve in these roles.

Managers must consider the employees skillset, interest, and fit prior to making these appointments and never assign a employee any duty or function they are unable to unqualified to do. Thus, managers should first assign employees who passed the language certification tests into emergency roles requiring bilingual skills. If more capacity is needed, staff who are bilingual and have a desire to use their skills to support emergency operations are encouraged to take the language certification tests as soon as possible.

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[7] Disaster Service Workers Policy 1.3.4 |
https://www.sanjoseca.gov/home/showpublisheddocument/17859/637140791290370000

Language Certification

To receive bilingual pay, the employee must pass a language proficiency examination certifying their ability to speak and/or write the required non-English language.

The City contracts with a firm that administers language certification tests based on the Common European Framework of Reference for Languages (CEFR). CEFR defines levels of ability as followed:

A1, A2: Basic transactions = elementary level

B1: Simple professional activities = working professional

B2: Complex professional activities = working professional

C1: Highly professional (highly complex tasks) = very advanced

The minimum ability the City tests for bilingual pay would be considered "B2 - low," which can be described as a working professional level. Some indicators of B2 performance on the certification tests are below.

Speaking (Oral Interpretation)

- Can develop a clear argument, expanding and supporting his/her points of view at some length with subsidiary points and relevant examples.

Sign Language Interpretation

- A qualified interpreter is one who can, both receptively and expressively, accurately, effectively, and impartially, using any necessary specialized vocabulary. Standards for hiring sign language interpreters is available from the Registry for Interpreters of the Deaf, Inc.

Writing

- Can follow the conventional structure of the communicative task concerned, when communicating his/her ideas.

- Can develop a clear argument, expanding and supporting his/her points of view at some length with subsidiary points and relevant examples.
- Shows a relatively high degree of grammatical control.
- Can vary formulation to avoid frequent repetition, but lexical gaps can still cause hesitation and circumlocution
- Can understand and use much of the specialist vocabulary of his/her field, but has problems with specialist terminology outside of it.
- Can adjust his/her expression to make some distinction between formal and informal registers, but may not always do so appropriately.

It is recommended only staff who pass the language certification tests perform language access assignments in the Department.

Expectations and Job Duties

Multilingual employees who receive bilingual pay will be required to perform some duties in the languages other than English in which they are proficient. However, it is still important for staff to involve professional interpreters and translators in order to provide high quality service to LEP residents when situations may go beyond their language abilities.

Multilingual employees may be asked to support interpretation or translation outside of their regular job duties. Multilingual employees are not required to complete these unanticipated requests outside of their regular job duties unless they are assigned to do so as part of emergency response efforts. They may complete requests outside of their regular job duties if they have capacity in addition to their existing workload. Multilingual employees are not required to serve LEP residents who are visiting other staff members or to perform the job duties of other staff members.

Oral Interpretation: Multilingual employees may act as interpreters for residents and coworkers in the languages they are proficient in everyday conversation when they have capacity.

Written Communication or Translation: Multilingual staff who passed the literacy test for

both written and oral bilingual pay are expected to write or translate short documents as part of their regular job duties. Anything that is not part of their regular job duties, is long, and/or has a particularly short turn-around time should be assigned to a professional firm. However, multilingual staff should plan to review and edit the professional translations for accuracy and readability. Multilingual staff who only have oral certification should not perform written translation.

Feasible writing tasks for employees who can write in languages other than English can include:

- o Simple document translations (½ page maximum)
- o Short social media posts (180 characters)
- o Short video summaries, based on a simple written script

Multilingual Staff Language Access Service Request Response

Multilingual employees may use the templates below to respond unanticipated language access requests.

Hello,

Thank you for reaching out with your language access request. To support you, please send me the following information:

- Name:
- Department:
- Email:
- Phone Number:
- Deadline:
- What documents did you attach for review? (Ie. agendas, powerpoint presentations, etc.]:
- Have you reached out to other bilingual staff with this request? If not, please send this request to all bilingual staff in the approved bilingual staff list who know the needed language. This will ensure that you receive a timely response.
- Brief description of assignment:

Please note:

- Please finalize documents prior to requesting translation.
- Turn-around time will depend on the complexity of the task and my current capacity to complete my regular job duties.
- You can find more resources on language access, the list of bilingual staff Citywide, and a list of language vendors on the [City Language Access Services intranet site.](#) For more information, please reach out to the City Language Access Coordinator.

I'll respond whether I am able to assist you in the next 24 hrs. If I am unable to support you with your request, please reach out to another staff person in your department or procure services with a language vendor.

Sincerely,
[Name]

Hello,

Thank you for reaching out with your language access request. I currently don't have capacity to complete this request in addition to my regular job duties. You can find more resources on language access, the list of bilingual staff Citywide, and a list of language vendors on the [City Language Access Services intranet site](#).

If you work for the Housing Department, here is [a list of resources describing how to plan for language access and ADA accessibility, and work with language vendors](#). If you work for a City Department other than Housing and have questions or need more information, please reach out to the City Language Access Coordinator.

Sincerely,
[Name]

Managers of Multilingual Employees

Language Access Coordinator[8]

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[8] The LAP manager is a position which was established in . As of ___ the Department has not hired an LAP manager.

The Language Access Coordinator (LAP Manager) ensures organizational compliance regarding the Department's Language Access Plan. They are a Senior Public Information Representative and report to the Department's Public Information Officer. The LAP Manager provides supervision and administrative oversight to the department's language access work through language access service contracts, language access leads, and coordination of communications and multilingual staff on the language access team. The LAP manager is responsible for assigning language access tasks and supporting multilingual staff so that they balance their current workload with their language access assignments. This manager is also responsible for notifying supervisors of language access assignments given to their team members. The LAP manager conducts regular LAP trainings for the Department as summarized in **Appendix C**. The LAP manager also supports direct in-language communication, interpretation, translation, and other tasks in the non-English languages they are proficient, as needed.

Prior to the writing of this LAP, staff were responsible for coordinating language tasks individually often without supervision or review. The LAP manager will continue to improve and professionalize the Language Access Plan, including operations, processes, evaluation, visibility, contractor pool, and pipeline of multilingual staff.

Other roles and responsibilities of the Language Access Manager

- Inform new hires of the availability of language access services offered by the City.
- Respond to inquiries regarding citywide vendors contracted to provide language access services.
- Inform all department staff of the HR Bilingual Employee List on the City of San José intranet and SharePoint, which includes a roster of bilingual/multilingual staff, their departments, their names, the languages that they speak, and certifications of their bilingual capacity (oral, written, or both). This list is also available on SharePoint for employees.
- Coordinate the reviewing efforts of bilingual/multilingual staff to ensure the accuracy, local acceptability, and cultural appropriateness of all translations for all languages in which the services are provided.
- Solicit feedback from bilingual/multilingual staff regarding contracted translations and interpretation services.

- Liaise with the citywide Language Access Manager for assistance with citywide language access trainings, updates regarding contracted vendors for language access services and feedback regarding contracted services.

Language Access Leads

The Department has designated language access leads to support communication in Spanish, Vietnamese, and Chinese. The language access leads must have working professional proficiency the non-English language they speak and are literate. Language access leads differ from the Language Access Coordinator as their primary jobs may not be communications and their language access tasks are specific to the non-English language in they are proficient.

Leads coordinate staff training in the language. They can also coordinate and review the work of other employees in that language. Language access leads complete more complex tasks and projects than other multilingual staff. For example, Leads may support the Public Information Office as the spokesperson for the Department in ethnic media in the language in which they are proficient.

All Managers

Language access work in the Department is essential. All Managers required to expect and plan for language access tasks in the workplans of their certified multilingual employees. This should include language access duties that would be expected in the employee's regular workload and any other language tasks they would perform in support of their assigned team.

All City employees are mandated disaster service workers. Managers are encouraged to have a plan to shift workload to other members of their team when multilingual employees are occasionally reassigned to emergency response communications. Multilingual employees sometimes receive last minute requests to provide interpretation and translation. If these tasks are important to the Housing Department and urgent, managers need to shift workload and deadlines in order to accommodate these new assignments.

Managers who are fluent in the same non-English languages of their employees should develop their staff's skills on how to use their language abilities as part of their regular assigned duties. Managers who are not fluent in the same non-English languages of their multilingual employees are not responsible for reviewing their work in these languages.

Managers may support their multilingual employees when their staff must decline unanticipated language requests when the employee does not have capacity to complete these assignments in addition to their regular job duties.

Role of External Language Vendors

It is important for staff to involve professional interpreters and translators when they would not be able to communicate reliably in the primary language of the resident. Staff should take special care as to not rely on friends, family members, children, or bystanders to act as interpreters. This can create misunderstandings and potential negative outcomes, including legal consequences.

The role of professional interpreters and translators is to break down linguistic and cultural barriers to facilitate effective communication between individuals who do not speak the same language. An interpreter's understanding of the languages they speak should be comparable to an educated native speaker. Professional interpreters and translators build this specialized skill through many years of learning, experience, and education.

Professional Interpreters are:

- Trained to relay a message and its meaning accurately from one language to another
- Bound by a code of conduct and code of ethics which requires all professional interpreters to maintain confidentiality and act ethically at all times
- Does not allow their personal judgements or feelings affect the interpretation

The City contracts with professional interpreters and translators that are familiar with the standard code of ethics for interpreters in the US. Examples include the National Code of Ethics and Standards of Practice, CHIA, and the IMIA Code of Ethics. These interpreters

and translators may also hold professional accreditations and have areas of specialization. For example, the City's vendor pool includes Medical Certified, Court Certified, and State Certified interpreters.

Although professional interpreters and translators are highly skilled, it is important that Housing staff review translations from language vendors. Language vendors are responsible for duplicated the English language into the desired language as accurately as possible. However, bilingual Housing staff are more likely to understand the context of the intended message. They able to further edit translations for readability and tone while ensuring clarity of the intended message.

The process to contract with language vendors is below:

How to Contract Language Services

Identify Languages	Identify Language(s) in which the content must be translated.
Determine Services	Determine which services are needed for the target audience and/or requests from the public.
Plan Ahead	Allow at least 1-2 weeks lead time to request interpretation or translation assistance. This does not include immediate interpretation needs which can be met with phone interpretation.
Rush	Rush service (<1-2 weeks) is available for interpretation and translation.
Search	Search the City Approved Vendor List: Email the vendor with a brief description of the project, any relevant documents, and a deadline. Request a quote for the service you need. NOTE: The City's approved language vendor list changes, so make sure to use the most recent list of vendors.

Seek Approval	Email the quote to a manager (Senior Development Officer or Senior Analyst and above) for approval. Copy the Department Administrative Officer. You will receive a charge code.
Coordinate Payment	The vendor will send you an invoice after the product or service is complete. Check the invoice for accuracy. Then email the invoice to the Department's finance team stating you approve the invoice for payment.

PROCEDURES FOR LANGUAGE ACCESS

All employees may need to communicate with residents in languages other than English at times. No staff member should refuse to serve a LEP resident because they do not know the resident's primary language. The procedures below provide guidance on how employees may navigate common scenarios to communicate with LEP persons.

This applies to both multilingual employees and monolingual English employees. Employees must factor in time for interpretation, translation, and translation review into their project timelines. Last minute requests may diminish the quality of the work and create delays completing the necessary tasks.

Verbal Communication in Non-English Languages

Welcoming LEP Residents to the Department

1. LEP residents often visit the Housing Department in-person. These residents may come in for information on any program or service directly or indirectly offered by the Department. All employees in the department are responsible for welcoming and providing a positive environment for LEP residents. As such, all staff will be trained to receive in-person LEP residents. To read more about language access training, please see the section on .
1. Housing staff who create appointments with LEP residents may take steps to make the welcoming process as smooth as possible.
    a. They may provide their zoom phone number and ask the resident to call or text them when they are in the lobby so that the staff member may greet them.
    b. They may instruct their residents to inform the front-personnel they have an appointment or present an email confirmation of their appointment so the front-desk person can reach the correct staff member.
2. Staff who are proficient in the primary language of the LEP residents should communicate directly in-language.
3. If the welcoming employee is not proficient in the primary language of their resident and the resident does not have an appointment, the welcoming staff person will

assess the language needed. Staff will use the HUD's "I Speak" language card to facilitate language identification.

4. After identifying the relevant language, the welcoming staff person will call the approved phone interpretation line. As of 2022, the Housing Department contracts with Voiance, a language hotline. The hotline utilizes professional interpreters and operates 24 hours a day, 7 days a week, in 240 languages. [9]

   In 2022, the Housing Department does not use phones designed specifically for interpretation. Staff are able to use the speakerphone function on their City issued phone during their meetings. Refer the Language Access Fact sheet to find the Voiance charge passcode.

5. Generally, recipients should not rely on family members, friends of the LEP person, or other informal interpreters. In many circumstances, family members (especially children) or friends may not be competent to provide quality and accurate interpretations. However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by the recipient but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so. Staff must make a record that the resident refused the professional interpretation service. If the language needed is not available from the current staff or vendors, staff must reschedule to a time when a professional interpreter can be present.

6. The welcoming staff person should ask for the reason of the resident's visit. Once the reason is identified, the welcoming staff person may:
   a. Provide informational materials related to the resident's visit in their primary language.
   b. Do a warm hand off to the relevant staff person who may be able to assist the resident.

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[9]

      i.   The relevant staff person may choose to provide service to the LEP resident on the spot.

     ii.   If the relevant staff person is absent or is not prepared to receive the LEP resident, the front desk person may take a message on the behalf of the LEP resident.

7. For services that the Department does not provide, staff may connect the resident with community-based organizations or other City Departments that may have the resources to assist the LEP resident.

It is not expected that multilingual employees be responsible for coordinating every LEP resident visit. Multilingual employees who are bilingual certified are primarily responsible for conducting their regular duties in English. Multilingual employees may communicate directly in-language when it is required to complete their job duties, workplan, or if requested by their clients.

Telephone calls

Staff sometimes receive calls from residents in languages other than English. If the welcoming employee is proficient in the language of the resident, the staff person should proceed as they would serve any other resident. If the staff person is not proficient in the primary language of the resident, they will greet them warmly and asses the language needed.

Staff can call the approved language interpretation hotline for interpretation.

The welcoming staff person should ask for the reason of the resident's call. Once the reason is identified, the staff person may:

- Provide service to the LEP resident on the spot.
- Refer the LEP resident to the correct resource, agency, or staff person.
- Schedule an appointment to further assist the LEP resident at another time.

Department Language Access leads may be listed as telephone contacts on Housing marketing materials which are written in non-English languages. This task is assigned to the Language Access leads as part of their regular job duties.

General Interpretation

All staff are encouraged to call Voiance for interpretation support.

Multilingual employees may act as interpreters in the non-English language they are proficient when they must interpret for a work assignment or choose to interpret voluntarily. It is important for multilingual staff to also utilize Voiance when the situation calls for greater fluency in the language than the staff member can provide.

Community Meetings in Languages other than English

Employees conducting community meetings with audiences intended to include LEP persons must contract with a professional language firm for interpretation. This applies for meetings of all sizes, from 1-1 meetings to large audiences.

Employees should confirm interpreters at least one week ahead of the meeting and forward any relevant agendas and presentation materials. The meeting facilitator should also check in with the interpreters at least 15 minutes before the start of the meeting to review the agenda and answer any clarifying questions. The interpreters will need to make an announcement in the beginning of the meeting to notify LEP persons that interpretation is available.

Staff will need to arrange for interpretation equipment rental when a community presentation is held in-person. This should be done when staff initially hires interpreters for the meeting.

Multilingual staff are effective presenters when they are able to provide a presentation within their area of expertise. It is unnecessary to book professional interpreters for meetings that are in the languages the staff presenter is proficient. It is recommended staff seek assistance from another bilingual coworker to review their presentation.

Multilingual staff are sometimes asked to support coworkers at community meetings. Any presentation that is not part of a multilingual staff member's area of specialty or regular job duties should be assigned to a professional firm. If a multilingual staff member must

support these types of presentations, they will be provided overtime compensation and should receive the relevant agendas and presentation materials at least one week ahead of the meeting.

TV or Radio Interviews

All media inquiries should be forwarded to the Housing Department Public Information Officer. The public information team should correspond directly with the media. Non-English media are able to correspond and coordinate via email or phone in English in most cases.

TV or radio interviews are not typically within most multilingual staff regular job duties, unless they are part of the public information team. If a non-communications staff member must support the public information team in a language other than English though interviews, talking points, as a speaker or interviewee, or in another role, they will be provided overtime compensation, comp time, or flextime as arranged with their supervisor. These media requests should only go to the Department's most fluent speakers in the required language. Multilingual staff should receive the relevant questions and reference materials as soon as possible in order to craft an effective response, especially when the topic is outside their area of expertise.

If no multilingual Housing staff have the capacity or skills to respond to the request, the Department should not rely on interpretation from the media outlet. Staff should utilize a professional language firm.

Zoom

Below are resources on how to use the Zoom interpretation feature:

Internal:

- [Recorded Zoom Interpretation Training Video](#)
- [Zoom Interpretation 'How-To' document](#)

Public:

- [Vietnamese how-to-video](#)
- [Spanish how-to video](#)
- Use these ~20-second videos in your meeting/webinar presentations to help communicate to Vietnamese- and Spanish-speaking Zoom attendees how to access the Zoom interpretation feature (a Chinese version is forthcoming)
- These can be [embedded directly into your Powerpoint](#) or shared from a separate window. Please remember to [share computer audio](#) when playing these videos.
- These videos and other language access resources will also be included in a City Virtual Community Engagement site.

Written and Visual Communication in Non-English Languages

HUD has adopted a "safe harbor" for translation of written materials that are considered strong evidence of compliance with Title VI obligations. It should be noted that failure to provide written translations according to the safe harbors does not mean the Housing Department is in noncompliance.

The "safe harbors" provide a starting point for the Department to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the "safe harbor" would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

The table below describes the safe harbors for written translations:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents

More than 5% of the eligible population or beneficiaries *and* more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries *and* 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

The definition of eligible population for this LAP is all residents of San José. According to the 5% test, the languages groups which represent 5% or greater than the total population are Spanish, Vietnamese, and Chinese. Further detail on the 5% Test can be found in **Appendix G**.

Staff should prioritize avoiding translation by crafting messages and documents directly in the non-English language when possible. When translation can't be avoided, written communication in languages other than English must go through one layer of review at a minimum. Multilingual staff should plan to review and edit professional translations in the language they are proficient for accuracy and readability. Multilingual staff who only have oral bilingual certification should not perform translation or other writing tasks in languages other than English.

Individual Emails

Staff may correspond with LEP residents via email in the languages they are proficient. If staff is communicating with an LEP resident via email in a language which they are unfamiliar, they may use the assistance of instant machine translation software. As of the writing of this LAP, outlook has a machine translate function which can be used to translate emails.

For example, Google Translate has a function to instantly identify written languages. Staff may try copy and pasting the message in Google Translate. However, Google Translate does not always successfully identify the language or translate the message accurately. Another online resource is https://www.deepl.com/translator.

If staff is unable to understand the instant machine translated message, staff should ask for the assistance on the LAP Manager or a Language Access Lead. Solely relying on machine translation can lead to miscommunication and potential confusion.

Email Blasts and Newsletters

All email blasts or newsletters which are written for the general public or audiences which may include LEP community members must be released in English, Spanish, and Vietnamese, and Chinese. If the email is directed toward a geographic area, staff may also refer to the City Language Map[10] to determine additional languages the message should be translated in. LEP residents should be referred to staff members who speak their primary language.

Some commonly used email taglines regarding language access and ADA requests are included below:

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[10] City of San José Language Map

<u>Interpretation Available Tagline</u>

Interpretation is available in Spanish and Vietnamese.
Se dispone de interpretación en español y vietnamita.
Thông dịch có sẵn bằng tiếng Tây Ban Nha và tiếng Việt.

<u>Interpretation by Request</u>

To request an accommodation for these meetings such as language interpretation, translation, and/or a disability related assistance, please contact [project manager name] at [project manager phone #] or [project manager email], or at least three business days before the meeting.

Para solicitar un alojamiento para estas reuniones como interpretación, traducción y o una incapacidad relacionada para asistencia, póngase en contacto con [Spanish speaking staff name] al [Spanish speaking staff phone #] o [Spanish speaking staff email] por lo menos de tres días antes de la reunion.

Nếu cần giúp đỡ tại những cuộc họp như thông dịch hay người khuyết tật cần giúp đỡ xin vui lòng liên hệ với [Vietnamese speaking staff name] tại [Vietnamese speaking staff email] hoặc 408-294-9337 (TTY) ít nhất ba ngày trước khi họp.

<u>ADA Request</u>

To request an alternative format agenda under the Americans with Disabilities Act for City-sponsored meetings, events or printed materials, please call (408) 535-1260 as soon as possible, but at least three business days before the meeting.

<u>How to Use Zoom Interpretation Feature</u>

Interpretation readily available in Spanish and Vietnamese

In your webinar controls, select "Interpretation." Click the language you would like to hear. For Vietnamese, please select "German."* * Zoom does not currently support Vietnamese translation, but we have added Vietnamese interpreters under "German."

Se dispone de interpretación en español y vietnamita.

En los controles de su seminario web, seleccione "Interpretation" (Interpretación). Haga clic en el idioma que desea escuchar. Para el vietnamita, seleccione "German".* * Zoom no ofrece actualmente la traducción al vietnamita, pero hemos añadido intérpretes vietnamitas en "German".

Thông dịch có sẵn bằng tiếng Tây Ban Nha và tiếng Việt.

Trong các điều khiển hội thảo trên web của bạn, hãy chọn "Interpretation" (Phiên dịch). Nhấp vào ngôn ngữ mà bạn muốn nghe. Đối với người Việt Nam, vui lòng chọn "German" (tiếng Đức). * *Zoom hiện không hỗ trợ phiên dịch tiếng Việt, nhưng chúng tôi đã thêm phiên dịch tiếng Việt dưới tựa "German" (Tiếng Đức).

Social Media Posts

As of 2022, the Housing Department uses Facebook, Twitter, and Constant Contact primarily to notify the public of Housing Department news. Common themes for these posts include sharing housing resources for the community and events such as legal clinics, community meetings, collecting feedback for Housing Department initiatives, or emergency notifications.

The Housing Department shares information in English, Spanish, Vietnamese, and Chinese Traditional. This allows LEP persons to access news and events in their primary language. Project managers should ensure the test for these posts are provided to the Communications team in English, Spanish, Vietnamese, Chinese at the same time, in order to avoid a lag in communication to LEP populations.

All social media posts must comply with accessibility standards for equal opportunity for people with disabilities to gain access to communications. Use the Accessible Social

Checklist to create content readable by everybody. Best practices includes #UseCamelCaseInHashtags, write alt text for images including GIFs, and caption all videos with dialogue or informative audio.

Short social media posts may be feasible for multilingual staff to write within a quick turnaround time. The assignment should be given to the Language Access Lead, or alternate, who will delegate the task to a staff person who can complete it by the required deadline.

Marketing Brochures

All marketing brochures for frequently accessed information should be provided in English, Spanish, Vietnamese, Chinese (Traditional and Simplified). Brochures should be bilingual English and one other language. Brochures should include QR codes to direct LEP community members to webpages in their primary language, or have an auto translate function. If brochures are posted on the Housing Department website, the content must be made available in an accessible pdf format or on a webpage.

PowerPoint Presentations

Staff who create PowerPoint presentations in non-English languages should include both English slides and slides in the primary language of the audience. The slides should alternate between English and the primary language of the audience, starting the first slide in the primary language of the audience.

When staff is providing a presentation for the general public, printed versions of the PowerPoint presentation translated in English, Spanish, Vietnamese, and Chinese Traditional. This should accompany interpretation in the meeting.

Tip: The use of images can simply communicate messages in all languages.

Always use Microsoft's accessibility checker. Fix errors and check all warnings to resolve issues before seeking translation.

Videos

All videos produced in the Department will be created with content in multiple languages All videos should include transcripts and subtitles in English, Spanish, Vietnamese, Chinese (Traditional and Simplified). For proper captioning, translations should be given to the video editor with timestamps so the video captions have proper placement and timing. If a video does not have an interpretation counterpart, the video should be duplicated to incorporate another language caption (English with Spanish, English with Vietnamese, etc) or use video interpretation with that language captioned. For best practices on captions, video descriptions, and transcripts follow guidelines from Accessible Social.

Besides professional language vendors, only the Language Access Coordinator, Language Access leads, or certified City language writers/speakers should write scripts or be video recorded in languages other than English for the department.

https://www.accessible-social.com/audio-and-video

Policy Documents

Executive summaries of final policy documents which are of importance to LEP communities should be created in English, Spanish, Vietnamese, and Chinese Traditional. Examples of this may include strategic plans or policies. Important documents related to policy development such as community meeting notes or presentations should be translated in the primary languages of the included audiences for transparency.

Translations of policy documents should be reviewed by housing staff, the City Attorney's office, and by LEP community members when possible.

Full translation of a municipal policies and legal requirements in other languages must provided for reference when requested. The municipal code is translated using Google Translate. Mistranslations can occur, so translations of policies must be reviewed by the City Attorneys office and professionally accredited legal translators.

Newspaper or Online Articles

All media inquiries should be forwarded to the Housing Department Public Information Officer. The public information team should correspond directly with the media. Non-

English media are able to correspond and coordinate via email or phone in English in most cases.

Providing interviews or drafting articles are not typically within most multilingual staff regular job duties, unless they are part of the public information team. A staff member should only provide interviews if asked by the communications team, provided specific talking points, and taken media training. No staff member should be taking an interview without approval from the Communications Manager or Housing Director. If a non-communications staff member must support an interview through reviewing and translating articles, drafting in-language talking points, as an interviewee, or in another role outside their working hours, they will be provided overtime compensation. Written media requests should only go to the Department's most effective writers in the required language and approved by the Communications Manager for release.

If no multilingual Housing staff have the capacity or skills to respond to the request, the Department should not rely on translation from the media outlet. Staff should request assistance from the City Language Access coordination in the City Manager's Office or utilize a professional language firm.

Emergency Notifications

Emergency notifications can include life or death scenarios of upmost importance to all San José residents. Language access should be a priority consideration in all emergency events.

Any official correspondance regarding emergencies and disasters should be released immediately at the same time in English, Spanish, Vietnamese, and Chinese.

A situation which poses an immediate risk and which requires urgent attention of the public from the Housing Department should be translated in more languages than those which qualify under the HUD 5% Rule.

This may include over 15 languages of which there are more than 5000+ speakers in San José.[11]

- Spanish
- Vietnamese
- Chinese (Traditional/Simplified/Cantonese/Mandarin)
- Tagalog
- Hindi,
- Korean
- Punjabi
- Persian (including Farsi and Dari)
- Amharic, Somali, or other Afro-Asiatic languages
- Tamil
- Russian
- Ilocano, Samoan, Hawaiian, or other Austronesian languages
- Telagu
- Malayalam, Kannada, or other Dravidian languages
- Portuguese

Legal Notifications and Forms

All vital legal documents should be created in English, Spanish, Vietnamese, and Chinese Traditional based on the document assessment matrix. Legal documents which are of vital importance to residents lives include tenants rights, rental agreements, legal forms, and petitions.

In some circumstances, the Department can not legally require the use of multilingual or translated documents by 3rd parties. In this case, staff shouldconsider creating template

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[11] Source: ACS 1-year 2021, Table B16001: Language spoken at home by ability to speak English for the population 5 years and over

documents which these parties may choose to use. This may include documents such as model leases or eviction notices.

Translations of legally binding documents should be reviewed by multilingual housing staff and the City Attorney's office.

Document Assessment Matrix

This section of the report describes the framework that will be used to assess which program documents qualify for automatic written translation into LEP languages.

HUD guidance characterizes a document as vital depending "upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Multilingual Housing Department staff of each Department Division will determine a list of vital documents related to programs and services that are provided directly through the Department. However, staff should consider the following:

A. Emergency notifications should be translated into more languages than those which qualify by the 5% rule.
B. Documents related to direct programs and services are automatically eligible for written translation into Spanish, Vietnamese, Chinese Traditional if they contain specific programmatic details such as eligibility, application procedures, terms, and applicant responsibilities. Multilingual Department staff which work for these divisions will determine if these documents should be translated in full, or if they can be provided in a condensed, summary form.
- For example, based on anecdotal evidence, the Rent Stabilization Program is one of the most frequently accessed programs by LEP groups, most frequently by Spanish and Vietnamese speakers. Certain documents such as the Petitions Forms, frequently asked questions documents for the Mobilehome Rent Ordinance, Apartment Rent Ordinance, Tenant Protection Ordinance, and Ellis Act Ordinance have been provided in Spanish, Vietnamese, and Chinese (Traditional and Simplified).
C. Additional program documents may also qualify as recommended by multilingual staff and decided on collectively by work teams. Particular consideration should be given toward other languages groups of which there are more than 5000 speakers who speak English less than "very well" and groups which are disproportionately impacted by housing issues. As of 2021, language groups of which there are more

than 5000 speakers who speak English less than "very well" include Tagalog and Korean.

Document Assessment Flow Chart

The below decision flow chart **may** be used by multilingual and language access staff to determine which documents should be translated.

Your decision-making process may not mirror the one below and may need to consider additional factors.

Document Assessment Steps

Ask yourself the following questions to determine initial recommendations to ensure language access on your project:

1. Would the document of program, information, encounter, or service involved, cause negative consequence to the LEP person if the information in question is not provided accurately or in a timely manner?

- If yes, automatically translate document to Spanish, Vietnamese, Chinese. Ensure documents are ADA compliant. Consider providing the document in additional languages as necessary.
- If no, proceed to process step 2

2. Do clients frequently access documents related to the respective Department program?

- If yes, automatically translate document to Spanish, Vietnamese, Chinese. Ensure documents are ADA compliant.
- If no, proceed to process step 3

3. Does the resident believe they can be served through oral interpretation of the document?

- If yes, orally interpret document.
  Note: Even if documents are available in the resident's primary language, oral interpretation of documents will be necessary if the resident does not read well, or read at all.

- If no, schedule an appointment with the resident and contract with a language vendor to translate summary material in the necessary language, including if the resident to be served uses a sign language, braille, or another non-spoken language.

Accessible Communication with People with Disabilities

The Americans with Disabilities Act (ADA) requires that public entities like the City of San José ensure people with disabilities can receive and communicate information as effectively as people without disabilities. The concept of "effective communication" is often accomplished with auxiliary aids and services such as communication devices, specific software, or service providers such as readers, and sign language interpreters. This section provides resources for communicating effectively with individuals with a variety of disabilities. For a listing of CSJ – approved vendors that provide these services visit https://www.sjcity.net/352/Language-Access-Services. For additional information, please visit the SharePoint Housing Department Accessibility folder.

Section 508 of the Rehabilitation Act of 1973[12] is a federal law that mandates all electronic and information technology (EIT) be accessible to people with disabilities. HUD requires its contractors and grantees to comply with Section 508 requirements through procurement and grant requirements. Technology is "accessible" if, regardless of the medium of the technology, individuals with disabilities to have ready access to and use of information and data that is comparable to the access to and use of the information and data by individuals without disabilities, unless doing so would result in an undue burden on the agency. HUD has issued a Departmental policy on compliance with Section 508, which is available at HUD Policy on Section 508 of the Rehabilitation Act and Accessible Technology.

Tips for Making Electronic Documents Accessible:

- Use a strong color contrast and avoid pattern backgrounds.
- Structure content in a layout that is easily read from left to right. When possible, avoid using text boxes, layout tables, and data tables.
- If data tables are used, ensure column and row headings are included and informative.
- Choose a font that is clear and easy to read; font size should be at least 12 points for standard text.

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[12] Source: https://www.hud.gov/program_offices/cio/Section_508_At_HUD

- Use built-in heading styles, such as Title, Heading 1, Heading 2, etc., to create a structured document. This will help readers understand document flow, and the sections relate to one another.
- Organize content into bulleted and numbered lists, using built-in styles, to organize content and make it more reader-friendly.
- When using images that convey information, provide alternative text (ALT text) descriptions that explain the purpose of the image. Avoid using color as the only means to convey information.
- Use digital signatures instead of handwritten signatures. Scanned documents are not inherently accessible, and they require additional time to make accessible.
- PDF documents must be tagged and structured per the above guidelines. PDFs of scanned documents (image only) are not accessible without additional effort.
- Provide equivalent text versions of inaccessible documents via accessible HTML, an alternative file format, or within the body of an email.
- Visit www.section508.gov/create for "how-to" guides, training videos, and a checklist on creating accessible electronic documents.
- ASL http://bit.ly/accessrevolutionTXT
- Captioning

MARKETING AND COMMUNICATIONS PROCESS:

Housing Department staff are responsible that each project has efficient marketing and communications planning with support from the Housing Communications team. Staff need to have an initial communications plan for their projects and setting workplans by using a communication planning form and submitting to the comms team. This includes the necessary steps to ensure language and disability access are met along with efficient communications with the targeted community audience.

Below is an example of the communication planning form with an explanation of how to fill in each section, the blank request form, and the process of the most efficient marketing and communication process

Language Access Request Form (Sample)	
Name	John Smith
Housing Division	RSP
Language Request	Vietnamese, Chinese Traditional and Simplified (Jane Smith has translated Spanish!)
Project Name	TPO FAQ Social Media Post
Project Description	Sharing TPO facts on social media
Project Deadline/Proposed Event Date	Translation: May 29 (to provide time for graphic creation) Published: June 5
Is the text finalized? *Highlight or Circle*	Yes No
Submitting this form is acknowledgement that I have read and understand the Housing Transcreation Process. Please attach any text or graphic files with this request.	

Housing Transcreation Requests

All requests will be routed to the Vendor timeline unless it is an emergency request.

Vendor (Project $$ minimum ~$100)
 In-House (<125 word count, emergencies only)

Depending on the word count, translation requests will require:

- Two-week notice recommended with one (1) week notice minimum advance notice for proper evaluation (ex. Priority turnaround, vendor purchase approvals, staff workload)
- Requested languages (Spanish, Vietnamese, Traditional Chinese, other as specified)
- File submission (Word doc, text in email, 3rd party graphic/flyer translation with Organization approval)

Language Access Request Form	
Name	
Housing Division	
Language Request	
Project Name	
Project Description	
Project Deadline/Proposed Event Date	
Is the text finalized? *Highlight or Circle*	Yes No

Submitting this form is acknowledgement that I have read and understand the Housing Transcreation Process. Please attach any text or graphic files with this request.

Housing Transcreation Process

1. **Create AND finalize text**
   - What needs to be communicated?
   - What are the key terms that draw interest?
   - Who is the targeted audience?
     - Maximum reading/writing level for community targeted communications is 8th grade
     - Content should be presented in a manner that the audience can relate to
       - Why is this important for them to know? How does this affect them?
       - Keep it simple-more text=more translation=more likely to cause confusion
   - Receive input from CBOs on content
     - Is this content relevant? Is it easy to understand at a basic level? Non-government level? If not, what are their suggestions to successfully communicate this content with the targeted audience?

2. **Request Translation (2 week minimum before event)**
   Submit translation request to: Language Access Coordinator (LAC). If the LAC is out of office, each team should have an appointed staff member who is responsible to submit translation/interpretation requests during that time.

   - Who will translate?
     - **Vendor:** Default choice for translations, especially anything over 125-word count. Give 1-2 week deadline. If event is planned with less than 1 week of timeline, it is highly recommended to push the event date to give proper time to provide efficient material and outreach.

- o Send in transcription request to language vendor (translation for written, interpretation for oral) depending on the length of the content.
- o When requesting, please include the following:
  - **Languages needed:** Specify Chinese as Chinese Traditional or Chinese Simplified (Traditional is used more widely with the City when space does not permit both)
  - **Due date:** This date should be 3 business days before date of posting if using a vendor so your department's language access team can review for any discrepancies
  - **Vendors do have minimum orders (usually $100).** Please communicate with other team leads to send multiple translation requests in a bulk request to save money.
  - Text **MUST** be finalized before sending to vendor.
  - IMPORTANT! If the targeted audience/location does NOT designate English as the primary/1st language, English should NOT be listed first, in prime reading location on the material, or posted first (if on social media).
- o **Housing employee:** Only for emergency turnaround or documents under 125 words. Must be translating a document within their team scope. If employee does not have the bandwidth to complete within deadline, they have the right to decline and must take emergency translation to vendor and pay rush fees.
  - Please note that in-house translations are voluntary by multilingual City employees. Multilingual employees must pass the City-mandated bilingual test to receive a pay differential as compensation.

3. **Design (if needed)**

- Develop the Layout: Know what you need created.
- Decide - Will this project be printed in-house or via vendor and quantity of prints, as letter size (8.5x11in), legal (8.5x14in), 11x17 or larger, size needed for specific social media platforms, or other special collateral

o   **Note:** This could start in the finalized content stage, but design can vary with language transcriptions due to language length

o   <u>Know Your Audience:</u> Knowing who you are communicating to is key to efficient communications. Messaging should be created so the people receiving the information acknowledges it is for them to read, them to understand it fully, and that they may have action items regarding it, for examples: a new ordinance that affects them, an event they are invited to attend or register for, etc. Also, if your communication collateral (flyers, social media, website, etc.) do not initially catch their eye, you already lost your audience before they even read the information. This means using colors, language, imagery, and more to grab your audience's attention. Cultural relevance is also important because certain colors and language could be offensive to certain audiences. Please see below for questions to consider as you are creating communications and outreach material. What colors/themes does the audience gravitate towards?

o   What colors/themes are considered offensive to the audience? For example, using gang colors like red or blue for schools, not using red with yellow accents for the Vietnamese community, etc.

o   NO stereotypical/offensive imagery. Ex. the same photo/image should NOT be used for different Asian communities (Chinese vs. Vietnamese vs. Filipino vs. Japanese)

o   DO include representation of gender/non-gender, people with accessibility needs

4. **Final Review**

- If necessary, receive artwork approval from supervisor
- Have CBOs review if they were a part of the process of the specific project, as well as CBO permissions to use their logo with correct guidelines
- The Department Public Information staff will share materials with department's Language Access Team review the design for cultural relevance

o   Text errors: Some characters need to stay together to keep the same meaning in some languages

o   Imagery: To make sure there isn't anything potentially offensive or perhaps a suggested similar icon that the audience prefers more

5. **Publish and Distribute**

- Designers should share materials in the following formats for optimum quality:
    - o   Graphics for Social Media: Export as JPG or PNG in RGB color mode
    - o   Graphics for Website/Online Viewing only: Export as JPG or PNG in RGB color mode; 72 ppi for a smaller image size, taking up less storage space on the website
    - o   Projects or Graphics intended to be printed: Export as a PDF in CMYK color mode; High-Quality file (300dpi). Include crop and bleed marks if the content extends to the edge of the paper (full color background, etc.)
- Distribution: Send soft copies in PDF format to CBOs. If sending printed copies, ensure enough quantity was ordered early in Step 3

STAFF TRAINING

The Housing Department has committed needed resources for language access through funding for language service vendors and engaging multilingual employees. The Department will provide employee training as part of the employee onboarding process and as necessary to ensure staff understands the agency's LEP policies and procedures.

Training helps ensure that all Housing Department employees are aware of the resources available, the procedures to access these resources (e.g., interpreters, bilingual staff, translation services, Vioance, sign language, and Braille), and the HUD points of contact for technical assistance. .

Staff training will be provided through a series of live webinars and on-demand videos available on the Department Sharepoint. The live webinar trainings will be held twice a year.

Lastly, the Department is committed to hiring diverse talent and will implement practices to attract multilingual candidates

Staff trainings are listed below.

Required for all employees:

- Live webinar: Employee Onboarding Presentation:
    - o Includes notification of LAP procedures and bilingual pay opportunities
- Live webinar: How to use Language Access Tools
    - o Importance of Language Access and Fair Housing and ADA legal obligations
    - o Local languages and cultural context
    - o How to hire interpreters and translators
    - o How to work with multilingual coworkers
    - o How to use Accessibility tools
    - o How to Work Effectively with Interpreters (practice scenario)
    - o How to welcome LEP and/or disabled residents in-person (practice scenario)

Trainings which may be completed necessary or as recommended:

- Live webinar: Using Spanish on the job for multilingual employees
    - o Job obligations for multilingual employees
    - o Spanish City and Housing Glossary
    - o Verbal communication
    - o Written communication
    - o Practice scenarios
- Live webinar: Using Vietnamese on the job for multilingual employees
    - o Job obligations for multilingual employees
    - o Vietnamese City and Housing Glossary
    - o Verbal communication
    - o Written communication
    - o Practice scenarios
- Live webinar: Using Chinese on the job for multilingual employees
    - o Job obligations for multilingual employees
    - o Chinese City and Housing Glossary
    - o Oral communication
    - o Verbal communication
    - o Practice scenarios
- Video: How to use Phone Interpretation
- Video: How to welcome LEP and/or disabled residents in-person
- Video: How to assess which documents to translate
- Video: How to hire firms for interpretation and translation
- Video: How to use the language features on Zoom
- Video: How to Work Effectively with Interpreters

ENSURING LANGUAGE ACCESS WITH SUBRECIPIENTS OF FEDERAL FUNDING

Per HUD guidance, sub-recipients of HUD funding are subject to LEP guidelines. The Housing Department administers various forms of HUD funding to various CBOs and nonprofit organizations, most of whom are within the City of San José and a handful outside City boundaries. The four primary HUD grants are: Community Development Block Grant (CDBG), Emergency Shelter Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and Home Investment Partnerships Program (HOME). The Department will collaborate with CBOs and nonprofit organizations to ensure that they comply with LEP guidelines. It is important to note that the Housing Department funds a diverse group of CBOs providing a wide range of services with different organizational structures, resources, and goals (See **Appendix A** for a complete list). The standard Housing Department contract includes the following two clauses:

Language Access Plan (LAP). GRANTEE shall fully implement and comply with the Language Access Plan (LAP) based on the Four Factor Analysis, as approved by the City of San José to ensure that Limited English Proficient residents have equal access to community programs and services.

Language Access Plan (LAP). GRANTEE shall fully implement and comply with the Language Access Plan ("LAP") based on the Four Factor Analysis, as mandated in FR-4878-N-02, and as approved by CITY to ensure that limited English proficient residents have equal access to community programs and services.

Collaboration with these CBOs cannot be a one-size-fits-all approach. Each LAP developed by the CBOs must fit the needs and resource capacity of each organization. The Department will meet with each of these CBOs to develop and implement an LAP. However, to the extent possible, the Department will explore resource sharing, enhanced communications, and heightened collaborative efforts among the constellation of the agencies, either through larger-scale workshops or smaller-scale focus group meetings.

The Department may also assist CBOs in translating their vital documents if they have a demonstrated need but lack the resources to perform the written translation. Each CBO

will perform the four-factor analysis recommended by HUD to determine what language services should be provided to ensure that LEP persons have meaningful access to services, however this is not the sole determiner for what documents should be translated. The Department anticipates that some CBOs may face significant resource constraints, a factor which should be documented and accounted for in the four-factor analysis.

The Department will work with these organizations on a case-by-case basis to determine reasonable levels of service based on the organizations' four-factor analysis and their resources. The CBOs should consider the document assessment matrix as a reference to determine the type of document requiring translation and the appropriate level of service (oral translation versus summary translation, for example). Each CBO should develop its own four-factor analysis and LAP and should be incorporated with the annual federal grant application and review process through the Housing Department.

The Housing Department understands that different subrecipients interact with LEP residents differently as each subrecipient works with different subpopulations and communities. The Housing Department asks that organizations that encounter LEP residents document such interactions in order to assist the Department and the City in determining where language access needs exist. Data on the number of LEP residents assisted and the language(s) that they speak are requested, at a minimum. Such data may be reported on a quarterly basis, alongside other reports that are required as per each subrecipient's contract.

Grantees are also required to comply with Americans with Disabilities Act (ADA). To prevent discrimination against people with disabilities, the ADA sets out requirements that apply to many of the situations people with disabilities encounter in the community. Employers, state and local governments, businesses that are open to the public, commercial facilities, transportation providers, and telecommunication companies all have to follow the requirements of the ADA.

The Department will monitor the status of LAP implementation and ADA compliance with grantee organizations and provide support as needed. This work can be part of annual site visits and quarterly reports.

MONITORING AND UPDATING THE PLAN

To provide effective language access for LEP residents, implementing agencies must monitor their plan and adjust them as necessary according to population changes and resident needs. In addition to monitoring procedural compliance to the LAP, staff must develop community partnerships and seek input from beneficiaries and LEP residents to continually improve language services.

The Housing Department will review its LAP annually to determine its effectiveness and to monitor any changes in LEP populations or needs. The Department Language Access Plan departmental review will be coordinated by the Language Access Coordinator. The Housing Department Grants managers will monitor LAP compliance with subrecipients of HUD funding as part of regularly scheduled contract negotiations, renewals, reports, and site visits.

Collecting, analyzing, and maintaining data is one way the Housing Department and CBOs may assess the efficacy of their LAP's. Without data, it is difficult to assess the quality of Housing Department services. The Language Access Coordinator and Language Access Leads will develop procedures for collecting and maintaining data to evaluate LAP performance. This may include the following:

Staff Composition
This information may be collected by the Housing Department Administrative Officer.

- #/% of multilingual staff as part of total staff of the Housing Department
- # of staff with oral certification in Spanish
- # of staff with oral certification in Vietnamese
- # of staff with oral certification in Chinese
- # of staff with writing certification in Spanish
- # of staff with writing certification in Vietnamese
- # of staff with writing certification in Chinese
- # of staff who are certified in American Sign Language

Training Outcomes

This information would be collected through staff evaluation forms at the end of LAP related trainings and the Department's regularly administered Racial Equity Survey.

- #/% of staff trained in How to Use Language Access Tools as part of all staff in the Housing Department
- #/% of staff who believe that language access is important to the work of the Housing Department
- #/% of staff who state they understand and know how to assist LEP persons on the job
- #/% of staff who state they understand and know how to implement accessibility practices into their daily work
- % of multilingual staff who state department training was sufficient to prepare them to use their non-English abilities on the job (Strongly Yes, Yes, Not Sure, Somewhat, No)
- #/% of staff who state they learned something in the training they believe they will use assist an LEP customer whose primary language is different from their own
- #/% of staff that state they believe the training was useful to them
- #/% of monolingual English speaking staff who have served an LEP customer whose primary language is different from their own in the previous year
- #/% of multilingual staff who have served an LEP customer whose primary language is different from their own in the previous year

Quality Assurance

This information would be collected through quality assurance phone calls and online survey sent to a random selection of LEP residents served in the previous year. All measures would be disaggregated by Spanish, Vietnamese, Chinese.

- # of attempted contacts to reach LEP persons through quality assurance phone calls and surveys
- # of LEP resident responses through quality assurance phone calls and surveys
- #/% of LEP responses which state they were turned away from service due to staff's inability to communicate their primary language

- #/% of LEP resident respondents who state they received quality service from Department staff in their primary language. This may include use of an interpreter. (rating 1-5)
- #/% of LEP resident respondents who state they received the information they were seeking from the Housing Department (Yes, no, somewhat)
- #/% of LEP resident respondents who state they were treated with respect by Housing Department staff (Yes, no, somewhat)

LEP Community Engagement

This information can be collected by the Housing Department Public Information Office and Housing Division managers.

- # of department presentations in non-English languages
- # of media interviews in non-English languages, disaggregated by language
- # of marketing materials produced in Spanish
- # of marketing materials produced in Vietnamese
- # of marketing materials produced in Chinese
- # of marketing materials produced in languages other than Spanish, Vietnamese, and Chinese
- Which programs are being accessed the most by LEP persons (rental rights, homebuyer programs, etc.)
- How does your division engage LEP persons? How often? [open form]

All indicators would be measured using data collected from the prior year unless stated otherwise. The above data and the HUD 5% test will be gathered and evaluated on a regular basis. Until quantifiable data is gathered, anecdotal evidence from multilingual staff will form the primary basis of LAP performance.

Again, anecdotally certain language groups may not appear to need language services. However, these groups may in fact be under-represented simply because they are not aware that language services exist and therefore do not seek services, not because they lack demand for such services. Implementing the LAP may uncover latent demand, which can be recorded and analyzed through data collection.

IMPLEMENTATION TIMELINE

The Housing Department will roll out initial implementation this LAP throughout calendar year 2023. The Department will assist and collaborate with sub-recipients of HUD funding to update and operationalize their LAP as part of their annual site visit.   Items on the timeline are subject to change to meet Departmental and CBO needs and priorities.

2023	• Publish new Language Access Plan • Conduct How to Use Language Access Tools Training for staff • Grants team conduct initial Language Access Plan checks with CBOs • Onboard new Language Access Coordinator • Present new Language Access Plan to Housing and Community Development Committee
2024	• Form internal bilingual staff Language Access Team • Designate and onboard Language Access Leads • Develop additional Language Access Trainings for staff • Begin to provide technical assistance to CBOs on their Language Access Plans • Evaluate first year of Housing Department new LAP implementation
Ongoing	• Conduct regular trainings • Conduct LAP evaluation and institute improvements as necessary

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APPENDIX

Appendix A: Example Language Identification Card

Appendix B: List of Subrecipients of Federal Funding

Appendix C: On-Demand Video Trainings

- Video: How to use live telephone interpretation
- Video: How to welcome In-person visits with LEP residents
- Video: How to welcome in-person visits disabled residents
- Video: How to assess which documents to translate
- Video: How to hire firms for interpretation and translation
- Video: How to use the language features on Zoom

Appendix D: City of San José Language Access Policy

Appendix E: Language Groups with Greater than 1000 Speakers in San José

Appendix F: Share of Residents in San José Who Speak English Less Than "Very Well" by Language

Appendix G: HUD 5% Language test and Renter Housing Burden

Appendix H: City of San José Language Map

Appendix I: Multilingual Glossaries of Government Terms

Appendix J: Marketing and Communications Plan Worksheet

Appendix K: CMO Language Access Unit Shared Folder

Appendix L: Vendor Lists

Appendix A: Example Language Identification Card

LanguageLine Solutions℠

Language Identification Card

As a LanguageLine Solutions client you have access to over-the-phone interpretation 24 hours a day, 7 days a week. Use this Language Identification Card in a face-to-face situation to determine which language a person speaks. The Language ID Card lists the languages most frequently encountered in North America, grouped by the geographical region where they are commonly spoken.

- To use the Language ID Card efficiently, locate the geographical region where you believe the speaker may be from. (Pacific Islands, Europe, etc.)

- Show the person the languages listed for that region. The message underneath each language says: "Point to your language. An interpreter will be called. The interpreter is provided at no cost to you."

English   **English** 📞
Point to your language. An interpreter will be called.
The interpreter is provided at no cost to you.

- Refer to your Quick Reference Guide (QRG) to access an interpreter through LanguageLine Solutions. In most cases, an interpreter is available within seconds.

- If you are unable to identify the language, our representative will help you.

Please note: LanguageLine Solutions interprets from English into more than 200 languages. Only the most requested languages are listed here. This list is subject to change based upon client demand.

From North America call **1 800 752-6096** for more information about our service.

Interpreting   Translation   Testing and Training

LanguageLine Academy

© 2013 LanguageLine Solutions / 1-800-752-6096 / www.LanguageLine.com

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Europe

Albanian   Shqip 📞
Tregoni me gisht gjuhën tuaj. Do të thërrasim një përkthyes. Përkthyesi ofrohet falas për ju.

Armenian   Հայերէն 📞
Նշեք, թե որ լեզվով եք խոսում։ Թարգմանիչը կկանչվի։ Թարգմանիչը ձեռատրամադրվի ձեզ անվճար։

Basque   Euskara 📞
Zure hizkuntza aukeratu. Jarraian interprete bati deituko diogu. Zerbitzu hau doakoa da.

Bosnian   Bosanski 📞
Pokažite svoj jezik. Pozvat ćemo tumača. Usluge tumača su besplatne za vas.

Bulgarian   Български 📞
Посочете вашия език. Ще бъде извикан преводач. Преводачът е осигурен безплатно за вас.

Croatian   Hrvatski 📞
Pokažite svoj jezik. Prevoditelj će biti pozvan. Prevoditelja čete dobiti besplatno.

Czech   Čeština 📞
Ukažte na váš jazyk. Bude zavolán tlumočník. Tlumočení je pro vás bezplatné.

Danish   Dansk 📞
Peg på dit sprog. En tolk vil blive tilkaldt. Tolken tilbydes uden omkostninger for dig.

Dutch   Nederlands 📞
Wijs uw taal aan. Er zal contact worden opgenomen met een tolk. De service van de tolk is geheel gratis.

Estonian   Eesti keel 📞
Osutage oma keelel. Vastava tõlgiga võetakse ühendust. Tõlketeenus on teie jaoks tasuta.

Finnish   Suomi 📞
Osoita maasi kieltä. Kutsumme tulkin paikalle. Tulkin käyttö on sinulle ilmaista.

French   Français 📞
Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

German   Deutsch 📞
Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird angefordert. Der Dolmetscher ist für Sie kostenlos.

Greek   Ελληνικά 📞
Δείξτε τη γλώσσα σας και θα καλέσουμε ένα διερμηνέα. Ο διερμηνέας σας παρέχεται δωρεάν.

Hungarian   Magyar 📞
Válassza ki a nyelvet. Tolmácsot fogunk hívni. A tolmács az Ön számára díjtalan.

Europe - continued

Icelandic   Íslenska 📞
Bentu á þitt tungumál. Það verður hringt í túlk. Túlkurinn er þér að kostnaðarlausu.

Italian   Italiano 📞
Indicare la propia lingua. Un interprete sarà chiamato. Il servizio è gratuito.

Lithuanian   Lietuvių 📞
Nurodykite savo kalbą. Bus pakviestas vertėjas. Vertėjas jums bus suteiktas nemokamai.

Macedonian   Македонски 📞
Покажете на јазикот на кој зборувате. Ке повикаме преведувач. Услугите на преведувачот се бесплатни.

Norwegian   Norsk 📞
Pek på språket dit. En tolk vil bli tilkalt. Tolken tilbys kostnadsfritt for deg.

Polish   Polski 📞
Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.

Portuguese   Português 📞
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Romanian   Română 📞
Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret caare vă este asigurat gratuit.

Russian   Русский 📞
Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.

Serbian   Српски 📞
Покажите свој језик. Преводилац ће бити позван. Преводилац је за вас обезбеђен бесплатно.

Slovak   Slovenčina 📞
Ukážte na svoj jazyk. Zavoláme tlmočníka. Tlmočenie je pre vás bezplatné.

Spanish   Español 📞
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Swedish   Svenska 📞
Peka på ditt språk. En tolk kommer att tillkallas. Tolken erbjuds utan kostnad för dig.

Ukranian   Українська 📞
Вкажіть вашу мову. Вам вкличуть перекладача. Послуги перекладача надаються безкоштовно.

Yiddish   ייִדיש 📞
ווײַזט אָן אױף אײַער שפּראַך מען וועט רופֿן אַ דאָלמעטשער. דער דאָלמעטשער ווערט אײַך צוגעשטעלט בחינם.

Pacific Islands

Fijian   Vosa Vakaviti 📞
Dusia na nomu vosa. Ni na Vakarautaki mai e dua na dau vakadewa vosa. Na dau vakadewa vosa e sega ni saumi.

Ilocano   Ilokano 📞
Itudo yo ti sao yo. Ag awag da ti maysa nga mangipatpatarus nga tumulong kadakayo nga awan ti bayad na.

Indonesian   Bahasa Indonesia 📞
Tunjukkan bahasa Anda. Penerjemah akan dihubungi. Penerjemah disediakan gratis tanpa dikenakan biaya.

Malay   Bahasa Melayu 📞
Tunjukkan bahasa anda. Jurubahasa akan dihubungi. Jurubahasa akan disediakan tanpa anda dikenakan bayaran.

Marshallese   Kajin Majōl 📞
Kelet kajin eo am. Im renaaj kur juon am Ri-Ukok. Ri-Ukok eo enaaj jibañ eok ilo ejjelok wōneen.

Samoan   Fa'asamoa 📞
Fa 'asino lau gagana. Ole a vala'au se fa'amatala'upu. Ua saunia se fa'amatala'upu e aunoa ma se tau e te totogiina.

Tagalog   Tagalog 📞
Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.

Tongan   Lea Faka-Tonga 📞
Tuhu'I mai ho'o lea fakafonua. 'E ui ha fakatonulea. 'Oki ta'etotongi kia 'a e fakatonulea.

North America, South America, and Caribbean

French   Français 📞
Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

Haitian Creole   Kreyòl 📞
Lonje dwèt ou sou lang ou pale a epi nap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

Navajo   Diné k'ehjí 📞
Nizaad bika'ígíí hich'į' dah díílnííh. Ata' halne'e bi'hágo hi'éé'doonííł. Ata' halne'é ei doo haida yit'ego bik'é ni'ííłééd da. T'áájíík'e ná ata' bodoohíłh.

Portuguese   Português 📞
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Spanish   Español 📞
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Asia - continued

Burmese
ကျွန်ုပ်တော့ဘာသာစကား ဖြင့်ပြန်ဆို ပေးသော စကားပြန် ကို ကျွန်ုပ်အတွက် စီစဉ်ပေးပါ။
ဝန်ဆောင်မှုကို အခမဲ့ ဖြင့်ဆောင်ရွက် ပေးပါသည်။

Hmong Hmoob
Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus.
Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.

Indonesian Bahasa Indonesia
Tunjukkan bahasa Anda. Penerjemah akan dihubungi.
Penerjemah disediakan gratis tanpa dikenakan biaya.

Japanese 日本語
あなたの話す言語を指さしてください。
無料で通訳サービスを提供いたします。

Karen
နၢ်လီၤစိာ်နီၤကျိာ်တၢ်ကတိၤဆူနအိၣ်တက္ၢ်.
တၢ်ကပာ်လီၤတၢ်ကတိၤ ကျိးထံတၢ်ကတိၤတၢ်ကတိၤ။

Khmer (Cambodian) ខ្មែរ (ខ្មែរ)
សូមចង្អុលបង្ហាញ នូវពាក្យសម្តីរបស់ អ្នក។
អ្នកបកប្រែ នឹងត្រូវ បាននាំមក។

Korean 한국어
귀하께서 사용하는 언어를 지정하시면 해당 언어의 통역 서비스를 무료로 제공해 드립니다.

Laotian ພາສາລາວ
ຊີ້ພາສາຂອງເຈົ້າ. ຈະໂທນຫານາຍແປພາສາ.
ທ່ານບໍ່ຕ້ອງເສຍຄ່າໃຊ້ຈ່າຍໃນການແປພາສາ.

Malay Bahasa Melayu
Tunjukkan bahasa anda. Jurubahasa akan dihubungi.
Jurubahasa akan disediakan tanpa anda dikenakan bayaran.

Mien Mien
Nuqv longc meih nyei waac fingx. Ninh mbuo porv waac mienh oix zuqc
heuc daaih liouh meih. Ninh mbuo porv waac mienh longx nyei jiaux-liouc
zuqc baeqc theiv maiv zuqc cuotv zinh nyaanh faan-liuc.

Mongolian Монгол
Таныг хэлээ зааж. Орчуулагч дуудагдана.
Орчуулгачийн тусламж таниу ямарч байх болно.

Thai ไทย
กรุณาชี้ภาษาของท่านเพื่อจะหา ล่ามมาแปลภาษาแก่ท่าน
การนี้ท่านไม่ต้องเสียค่าใช้จ่ายใด

Vietnamese Tiếng Việt
Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được
gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

Middle East

Arabic عربي
أشر إلى لغتك. وسيتم الاتصال بمترجم فوري لك.
سيتم إحضار المترجم الفوري مجاناً.

Armenian Հայերէն
Նշեք, թէ որ լեզուով էք խօսում: Թարգմանիչ մը կանչուի։
Թարգմանիչը ձրիաբար ձեր տրամադրութեան ներքեւ կ'դնուի:

Azerbaijani Azərbaycan dili
Danışdığınız dili bildirin. Sizin üçün tərcüməçi dəvət
olunacaq. Tərcümə xidməti üçün ödəniş tələb olunmur.

Dari دری
زبان مورد نظر را نشانی کنید. یک ترجمان فرا خوانده
می شود. این برای شما کاملا رایگان در نظر گرفته شده است.

Farsi فارسی
زبان مورد نظر خود را نشانه کنید. یک مترجم برای شما
در نظر گرفته خواهد شد. این خدمت رایگان می باشد.

Hebrew עברית
הצבע על שפתך. מתורגמן יוזמן עבורך. השירות
ללא תשלום. שירותי תרגום יסופקו לך ללא תשלום.

Kurdish کوردی
ئاماژه به زمانهکهت بکه، وهرگێڕێکت بۆ دههێنین.
به خۆڕایی ئهم وهرگێڕانه بۆ ئێوه پێشکهش دهکرێت.

Pashto پښتو
خپله ژبه په نښه کړه. يو ژباړونکی به راوستل شي.
ستاسو لپاره به دا ژباړه وړيا ترسره شي.

Turkish Türkçe
Konuştuğunuz dili gösterin. Sizin için çevirmen
aranacaktır. Bu çevirmen size ücretsiz sağlanır.

Asia

China 請點選您的語言。一 : 以後為 請依認您的語言。 以後為
您提供免費的口譯服務。 您提供免費的口譯服務。

Cantonese	廣東話	广东话
Chaochow	潮州話	潮州话
Fukienese	福建話	福建话
Mandarin	國語	普通话
Shanghai	上海話	上海话
Taiwanese	台灣話	台湾话
Toishanese	台山話	台山话

Africa - continued

Dinka Thok monyjang
Wëet ten thoungdie. Raan weetgeryic a col.
Agerwelyic ku a cin aroop biyik yen.

French Français
Indiquez votre langue et nous appellerons un interprète.
Le service est gratuit.

Hausa Hausa
Nuna zuwa ga yarenka. Za a kira tafinta. An samar maka
da tafintan ne ba tare da sai an biya kudi ba.

Italian Italiano
Indicate la propia lingua. Un interprete sarà chiamato.
Il servizio è gratuito.

Nuer Mägäcä luqädädä
Ku tilmään luqädädädä. Turjubään äyää looyëët-doonää.
Turjubäänkä lägugu yëëtäryo wää biltäiäh.

Oromo Oromo
Gara afaan keetti eeri. Turjumaanni ni waamama.
Turjumaanni beesee takka malee siif qophaawa.

Portuguese Português
Indique o seu idioma. Um intérprete será chamado.
A interpretação é fornecida sem qualquer custo para você.

Portuguese Creole Crioulo Portugues
Nho pontá pa lingu qui nho ta papiá. No ta arranja um interprete
pa nho. No ta rranja um interprete e nho ca ta pagá nada pa el.

Somali Af-Soomaali
Farta ku fiiqluqadaada… Waxa laguugu yeeri doonaa
turjubaan. Turjubaanka wax lacag kaaga bixi mayso.

Swahili Kiswahili
Onyesha lugha yako. Mkalimani atarirwa.
Utapewa mkalimani bila gharama yoyote.

Tigrinya ትግርኛ
ቋንቋኹም �። ኣተርጓሚ ክጽዋዕ ኢዩ።
ኣተርጓሚ ኣይክፍሪልኩም ብናጻ ክግልገል ኢኹም::

Wolof Wolof
Taannal sa lakk ngir fiou bolela ak kou degg sa lakk
mou dimbeuli leu. Ndimbeul bi do ci fey dara.

Yoruba Yorùbá
Tọka si édè re. A ó pe ogbufọ kan.
Ọ̀fẹ́ ni a ó pe ogbufọ yii fun ọ.

India, Pakistan, and Southwest Asia

Bengali বাংলা
আপনার ভাষার দিকে নিৰ্দেশ করুন। একজন দোভাষীকে ডাকা হবে ।
দোভাষী আপনি নিঃৱৱে বাৱহার পাৱেন ।

Gujarati ગુજરાતી
તમારી ભાષા તરફ આંગળી ચીંધો. ભાષાંતર કરનારને બોલાવવામાં આવશે.
ભાષાંતર કરનારની સેવા તમને વિનામૂલ્યે પૂરી પાડવામાં આવશે.

Hindi हिंदी
अपनी भाषा को इंगित करें जिसमें अनुवाद आपके लिए दुभाषिया
बुलाया जाएगा। आपके लिए दुभाषिया की निःशुल्क व्यवस्था की जाती है।

Malayalam മലയാളം
നിങ്ങളുടെ ഭാഷയിലേക്ക് ചൂണ്ടുക. ഒരു വ്യാഖ്യാതാവിനെ
 വരുത്തുന്നതാണ്. ഈ വ്യാഖ്യാതാവിന്റെ സേവനം
നിങ്ങൾക്ക് സൗജന്യമായി നൽകുന്നു.

Nepali नेपाली
आफ्नो भाषातर्फ औंल्याउनुहोस् एक व्याख्याता बोलाइन्छ
तपाईंले निःशुल्क रूपमा व्याख्याता प्राप्त गर्नुहुनेछ।

Punjabi ਪੰਜਾਬੀ
ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ ਇੱਕ ਦੁਭਾਸ਼ੀਏ ਨੂੰ ਬੁਲਾਇਆ ਜਾਵੇਗਾ।
ਤੁਹਾਨੂੰ ਦੁਭਾਸ਼ੀਆ ਮੁਫ਼ਤ ਮੁਹੱਈਆ ਕੀਤਾ ਜਾਵੇ ਗਾ।

Sinhalese සිංහල
ඔබේ භාෂාව පෙන්වන්න, පරිවර්තකයෙකු කැඳවනු ලැබේ.
ඔබ වෙනුවෙන් මෙම පරිවර්තකයා සපයනු ලබන්නේ නොමිලේ.

Tamil தமிழ்
உங்களது மொழியைச் சுட்டிக்காட்டுங்கள். மொழிபெயர்ப்பாளர்
ஒருவர் அழைக்கப்படுவார். மொழிபெயர்ப்பாளர் உங்களுக்கு
இலவசமாக வழங்கப்படுவார்.

Telugu తెలుగు
మీ భాషను చూపించండి. మీ కోసం వ్యాఖ్యాత పిలవబడతారు.
మీకు వ్యాఖ్యాత నిమిత్తం ఎటువంటి ఖర్చు ఉండదు.

Urdu اردو
اپنی زبان پر اشارہ کریں۔ ایک ترجمان کو بلایا جائے گا۔
ترجمان آپ کو مفت مہیا کیا جائے گا۔

Africa

Acholi Acoli
Siem thok ma iyac. Ja loko ibiro luongi.
Jaloko no ochiuni ma onge chudo.

Amharic አማርኛ
ቋንቋዎትን ይመልከቱ። አስተርጓሚ ይደወልዎታል።
አስተርጓሚዎ በነጻ ያቀርብልዎታል።

Arabic عربي
أشر إلى لغتك. وسيتم الاتصال بمترجم فوري لك.
سيتم إحضار المترجم الفوري مجاناً.

♻ Printed on recycled paper. LLS 02/13

Appendix B: List of Subrecipients of Federal Funding

Community Development Block Grant (CDBG)
SJSU Research Foundation
Somos-Mayfair
HomeFirst
The Health Trust
POSSO
Law Foundation
First Five
Rebuilding Together Silicon Valley
Habitat for Humanity
Downtown Streets Team
Job Train
International Rescue Committee
Law Foundation
Emergency Solutions Grant (ESG)
County of Santa Clara
Bill Wilson Center
PATH

HOME Grant
Rebuilding Together Silicon Valley
Sacred Heart
Bill Wilson Center
YWCA
Next Door Solutions to DV
Catholic Charities
The Health Trust
Law Foundation
Housing Opportunities for Persons With AIDS (HOPWA)
San Benito County
The Health Trust
CDBG (CARES Act CV1 & CV3)
Asian American Center in Santa Clara County
Catholic Charities
SJSU Research Foundation
Somos Mayfair
Sacred Heart
HomeFirst
Law Foundation

Team San Jose (PRNS)
ESG (CARES Act CV1 & CV2)
LifeMoves
PATH
HomeFirst
PATH
Abode
LifeMoves
Bill Wilson Center
HOPWA (CARES Act)
The Health Trust
HOPWA (CARES Act)
The Health Trust

Appendix C: New Contract/Amendment Agreement Language

Outreach under this AGREEMENT shall be conducted in accordance with the CITY's Language Access Plan. The CITY's Language Access Plan is posted at: https://www.sanjoseca.gov/your-government/departments/housing/memos-reports-plans/hud-reports. GRANTEE's outreach plan, referral process, and service delivery shall prioritize racial equity and provide culturally competent and linguistically accessible services to persons from diverse backgrounds, including non-English speaking communities. Plans must address racial and economic disparities for people of historically marginalized groups.

2.08   Language Access Plan (LAP). GRANTEE shall fully implement and comply with the Language Access Plan (LAP) based on the Four Factor Analysis, as approved by CITY, to ensure that Limited English Proficient clients have equal access to community programs and services.

C. GRANTEE shall fully implement and comply with its City-approved Language Access Plan to ensure that Limited English Proficient clients have equal access to community programs and services.

8.   **COVID-19 Assistance Navigation Hotline (CAN-19 Hotline). For workers who need additional assistance understanding or accessing resources provided through the California Employment Development Department (EDD), such as unemployment insurance, Resource Coordinators would make a connection to the County's CAN-19 Hotline. The CAN-19 Hotline assists in English, Spanish, Vietnamese, and Mandarin.**

Appendix D: On-Demand Video Trainings

- Video: How to use Phone Interpretation
- Video: How to welcome LEP and/or disabled residents in-person
- Video: How to assess which documents to translate
- Video: How to hire firms for interpretation and translation
- Video: How to use the language features on Zoom
- Video: How to Work Effectively with Interpreters

Appendix E: Language Groups with Greater than 1000 Speakers in San José

Language Group	Persons 5yr & up
Total:	932,764
Spanish:	205,564
Vietnamese:	95,156
Chinese (incl. Mandarin, Cantonese):	74,179
Tagalog (incl. Filipino):	28,554
Hindi:	21,157
Korean:	12,571
Punjabi:	6,635
Persian (incl. Farsi, Dari):	8,807
Amharic, Somali, or other Afro-Asiatic languages:	5,826
Tamil:	8,073
Russian:	6,972
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	6,292
Telugu:	8,137
Malayalam, Kannada, or other Dravidian languages:	5,641
Portuguese:	5,460
Japanese:	6,210

Nepali, Marathi, or other Indic languages:	4,626
Gujarati:	3,313
Other languages of Asia:	2,065
Arabic:	4,459
Thai, Lao, or other Tai-Kadai languages:	1,125
Khmer:	3,185
Bengali:	1,814
Urdu:	1,916
French (incl. Cajun):	2,176
German:	1,571
Other and unspecified languages:	1,564
Italian:	1,096
Other Indo-European languages:	2,802

Source: ACS 1-year 2021, Table B16001: Language spoken at home by ability to speak English for the population 5 years and over

Appendix F: Share of Residents in San José Who Speak English Less Than "Very Well" by Language

Language Group	Total	% of all Persons 5 & up	% of non-English Speakers
Total:	932,764	100%	
Speak only English	390,431	40%	0%
Speaks language other than English	542,333	60%	100%
Speak English less than "very well"	226,038	24%	42%
Spanish; Speak English less than "very well"	79,300	9%	15%
Vietnamese; Speak English less than "very well"	58,903	6%	11%
Chinese (incl. Mandarin, Cantonese); Speak English less than "very well"	36,998	4%	7%
Tagalog; Speak English less than "very well"	10,973	1%	2%
Korean; Speak English less than "very well"	6,228	0.7%	1.0%

Source: ACS 1-year 2021, Table B16001: Language spoken at home by ability to speak English for the population 5 years and over

Appendix G: HUD 5% Test and Housing Burden in San José by Ancestry

HUD safe harbor provision used in this report is "More than 5 percent of the eligible population or beneficiaries and more than 50 in number."

This report applies the definition of "eligible population" and the 5 percent safe harbor provision as specified above to 2021 Census data which estimates English speaking ability of various language groups. This is for people over the age of 5. It is important to note that English speaking does not represent English literate. The languages that qualify under our definition are Spanish, Vietnamese, and Chinese.

However, size of group does not represent meeting the true needs of the community. Staff should intentionally plan targeted language access any or all language groups when the situation suggests it would be necessary. The Housing Department should make progress toward using the HUD safe harbor provision which recommends all vital translated documents are provided for language groups which represent 1,000 or more in the eligible population in the market area or among current beneficiaries.

One area for staff to explore expanding language access in Amharic. This determination is based on the disproportionately high rates of renter housing burden among African Ancestry communities in San José. Renter housing burden is when a household pays more than 30% of their gross income on rent, making it difficult for the household to meet their other basic needs such as food, medicine, and childcare.

According to 2019 IPUMS data, the African Ancestry community and Vietnamese community experience the highest rates of renter housing burden in the City (66%). This can be compared to other populations with the lowest rates of renter housing burden including South Asian (30%) and English (36%).

The most common languages other than English spoken by African Ancestry communities in San José include Yoruba, Oromo, Amharic, Igbo, and Tigrinya. Of those, census data and anecdotal evidence indicates Amharic as the most commonly spoken language and estimates 7,484 speakers of Amharic, Somali, or other Afro-Asiatic languages reside in San Jose. Limited English Speaking persons of African Ancestry in San José are most likely to be of Ethiopian descent.

Thus, staff recommends that the Housing Department develop a strategic communications plan for the African Ancestry community.

Tables illustrating the result of the 5% test and housing burden analysis by ancestry are below.
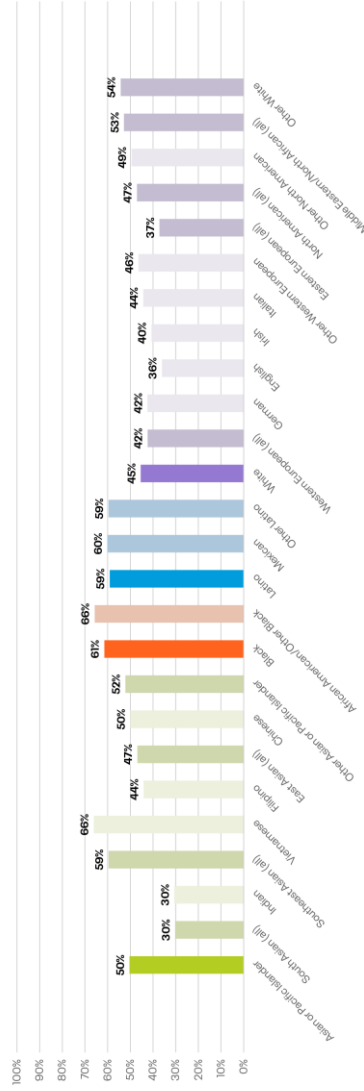
HUD Safe Harbors Provisions – 5% Test

Spanish
• Total Population of Speakers: **205,564** (22%)
• Speaks English less than "very well": 79,300 (9%)

Vietnamese
• Total Population of Speakers: 95,156 (10%)
• **Speaks English less than "very well":** 58,903 (6%)

Chinese
• **Total** population of Speakers: 74,179(8%)
• **Speaks English less than "very well":** 36,998 (4%)

Source: ACS 1-year 2021, Table B16001: Language spoken at home by ability to speak English for the population 5 years and over

Appendix G: HUD 5% Test and Housing Burden in San José by Ancestry

Housing burden by tenure, severity, race/ethnicity, and ancestry: San Jose City, CA; **Tenure:** Renters; **Severity:** Burdened; **Year:** 2019

Category	Percent
Other White	54%
Other North African (all)	53%
Middle Eastern/North African	49%
Other North American (all)	47%
North European (all)	37%
Eastern European	46%
Other Western European	44%
Italian	40%
Irish	36%
English	42%
German	42%
Western European (all)	45%
White	59%
Other Latino	60%
Mexican	59%
Latino	66%
African American/Other Black	61%
Black	52%
Asian or Pacific Islander	50%
Chinese	47%
Other Asian (all)	44%
East Asian (all)	66%
Filipino	59%
Vietnamese	30%
Southeast Asian (all)	30%
Indian	50%
South Asian (all)	
Asian or Pacific Islander	

Appendix J: Vendor Lists

Vendor & Language Access Dashboard: No contact vendor info; Includes what translation and interpretation services are provided per vendor

Vendor Matrix Updated: 3-27-20: Includes the contact information of each vendor

Citywide PO Matrix: Detailed OPO info on each vendor

Appendix K: The Resources

The following table lists valuable resources to help HUD Intermediaries and HCAs become more familiar with LEP guidance.

RESOURCE NAME AND LINK	DESCRIPTION
HUD Housing Counseling Program Handbook 7610.1 Rev. 5, Chapter 3	Documents the requirements related to LEP for HCAs.
Limited English Proficiency—Federal Website	Provides basic information and additional links about LEP.
Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs	Tool to help HCAs determine language access service needs and develop implementation to provide services.
Limited English Proficiency—HUD Website	Provides documents, including the HUD Federal Register Notice: Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, and "I-Speak" cards created by HUD program offices printed in English and other languages.
Executive Order 13166 on Limited English Proficiency	The federal interagency website is dedicated to describing the executive order for serving those who are LEP, including providing frequently asked questions.

Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency	HUD Office of General Counsel guidance on Fair Housing Act protections for persons with LEP. This guidance discusses how the Fair Housing Act applies to a housing provider's consideration of a person's limited ability to read, write, speak, or understand English.
HUD Memo on Immigrant Access to Housing and Services	HUD and the U.S. Department of Justice joint letters to remind recipients of federal financial assistance that they should not withhold certain services based on immigration status when they are necessary to protect life or safety.
American Community Survey	The American Community Survey, compiled by the U.S. Census Bureau, is an ongoing survey that provides vital annual information about our nation and its people. The link (left) goes directly to the latest data tables, searchable by LEP.

RESOURCE NAME AND LINK	DESCRIPTION
Migration Policy Institute	The Migration Policy Institute is an independent, nonpartisan, nonprofit think tank in Washington, DC, dedicated to the analysis of the movement of people worldwide.
Limited English Proficiency Frequently Asked Questions	Frequently asked questions on the Final LEP Guidance (as found in the Federal Register dated January 22, 2007.)
Fannie Mae Spanish Resources	Fannie Mae website search that returns Spanish-language resources.

FHFA Mortgage Translations Clearinghouse	The FHFA resource page includes sample documents translated into Spanish, traditional Chinese, Vietnamese, Korean, and Tagalog. Other materials will be added in the future in other languages.
FHFA and Consumer Financial Protection Bureau (CFPB) Glossaries of Mortgage Terms	FHFA and CFPB have created glossaries of mortgage terms in other languages to standardize the industry.
HUDCLIPS	Provides HUD forms translated into various languages.
OHC Stakeholder Webinar on Serving LEP Persons October 2016	Tips from Fair Housing and Equal Opportunity Office staff and HCAs on their experiences and best practices in meeting the needs of underserved populations, including LEP persons.
OHC Limited English Proficiency Webinar June 2015	Tips and tools for working with LEP clients.
HUD Form 9902	This required HUD to form records of housing counseling and education activity by agencies participating in the Housing Counseling Program, including LEP persons served.
HUD Form 9902 Toolkit	An online toolkit for filling out HUD Form 9902.
Bridge Newsletters: • Volume 4, Issue 11—May 2016 • Volume 5, Issue 4—October 2016 • Volume 5, Issue 10—April 2017	These newsletters include best practices from HCAs on serving LEP persons.

Appendix L: About the Authors
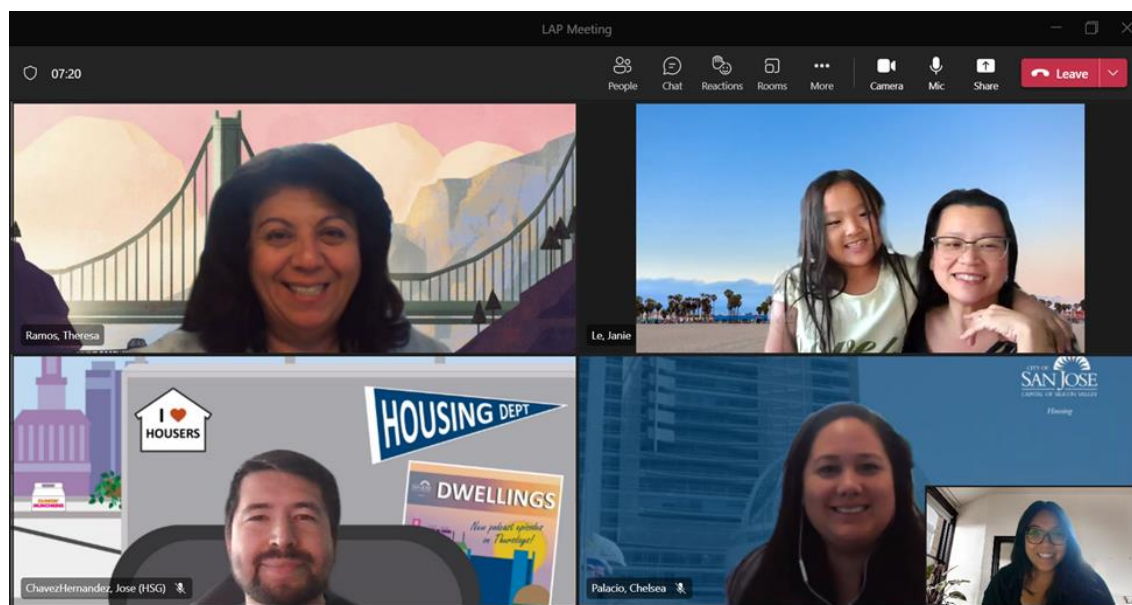
Janie Le, a bilingual Development Specialist for the City of San José, Housing Department, has been with the City of San José for more than 8 years. Her role is quite diverse. She has been assisting the first-time homebuyer programs, underwriting City home loans for first time homebuyers, responsible for making sure all affordable housing projects are following compliance for affordable rent increases, and providing the community with the low-income housing, and now she is currently working with the developers to ensure that new projects follow the City's loan agreement, requirements, and loan disbursements. When she first started with the City, she realized that there are so many resources that City has to offer but not all communities knew about it including her as a fluent English speaker. So, she decided to find ways to implement and make changes so all community members can be aware of the resources and have the equal chance of utilizing them. She has been involved in so many levels including and not limited to bringing awareness to the Vietnamese community with their rights in the mobile home park with rent control rules and regulations, their rights as tenants, and where to get legal services if they felt that they were taken advantage of since they don't speak English and or being mistreated. She was always volunteering her time as an interpreter for community meetings that involved the community's input regarding issues around the community and programs that are being implemented by the City. She wanted language barrier to not be an

issue any community members especially the monolingual ones. She has been involved and volunteered for all the emergency situations that City has encountered from 2015-present. This includes the Coyote Creek flood, COVID 19 Pandemic, The SCU fires that were happening in 2020, etc. She was a part of the activated Language Access Unit (LAU) City of San José which received the 2022 Excellence in Public Information & Communications (EPIC) award from the California Association of Public Information Officials (CAPIO). The award recognizes the work of the Language Access Unit (LAU) on COVID-19 communications in the category of 'Crisis Communications Response. The Office of Communications was proud to receive the EPIC Award during the annual CAPIO Conference on behalf of the City and the 25 bilingual employees who heeded the call to save lives and livelihoods by transcreatiing vital information. The Communications team also presented "Language Access Unit: Effectively reaching non-English speakers during emergencies." The presentation highlighted the creation of the LAU in response to the critical need to communicate to those most vulnerable to COVID-19 and its effects: residents and businesses who are less-connected to City communication channels and services, low-income residents, and those for whom English is not a primary language. Bilingual City staff from various departments were activated in the Emergency Public Information Office, a branch of the City's Emergency Operations Center, to help trans-create life-saving information and to keep San José's non-English speaking residents informed. The LAU team quickly and accurately provided translations for emergency communications - videos, press releases, advertisements, social media posts, signage, Flash Reports - in Spanish, Vietnamese, Chinese, Tagalog, Hindi, and Punjabi She assisted and put many hours into in translations, creating informational videos, review of all the contents that went out to the community. She was one the few that vested time and efforts to make sure the community get the correct information and resources in a timely manner with a team of three Vietnamese staff. Small team but a passionate and dedicated one. It was hard work, but she is very proud that her efforts and energy has made a difference. Currently she is working on making a change with language access for all including the monolingual community members for the Housing department programs, better pay for bilingual employees, and recommendations to the language access policy to to the ever-changing needs of the community along with GARE Housing team colleagues in the Housing department. [Pictured top right]

Theresa Ramos, M.A., a bilingual Senior Analyst for the City of San José, Housing Department, has over 20 years of work experience in policy, program management, community organizing, housing, rent control, recreation, youth, families, and legal advocacy. Language Access is one of Theresa's social justice and advocacy initiatives. Her passion is instilled by the legacy of her parents, immigrants from Mexico, husband, quadrilingual immigrant from Iran and Sweden to make a positive difference for her trilingual daughter, family, and community. [Pictured top left]

Mollie McLeod she/her

Senior Development Officer (retired rehire)

I am thankful for the opportunity to work on disability equity and accessibility projects, including communication as part of the Language Access Plan. Favorite hashtag is #AccessIsLove. [Not pictured]

Chelsea Palacio works for the City of San José as a Public Information Representative. She was born and raised in San José in a mixed Filipino, Japanese, and mixed European family of six. With a background in graphic design, her work incudes communicating key City resources to the community. Chelsea strives to educate herself to provide the best communication possible to San José residents by making sure the information is clear, concise, and culturally relevant. Language equity is very important to her because she believe language should not be a barrier to receive help, resources, or even having a conversation amongst neighbors. [Pictured bottom left]

Josephine Lee (she/her) is the Contracts and Grants Manager/Interim Development Officer at the City of San Jose's Housing Department, Grants Division. In this pivotal role, she develops intricate contract agreements for homeless services, property management projects, and construction projects, ensuring the seamless integration of the Language Access Plan into these vital contracts, even during the challenges of the COVID-19 pandemic. With a career deeply rooted in the city's ongoing transformation, Josephine passionately advocates for equitable access to services, particularly within homeless shelters, regardless of residents' linguistic backgrounds. In her role, she embodies the values of a diverse and inclusive San José, amplifying every voice in our vibrant cultural tapestry.

Jose Chavez works as a Public Information Representative with the City of San José Housing department. As a bilingual Content Specialist he manages multiple levels of communication ranging from the Department website, social media, video editing, and Dwellings podcast. Previously, Jose has worked as a COVID-19 Champion at Mobile Vaccination Units and at the Eviction Help Center. Going over the LAP was a great opportunity to update current trends and cement important values to positions that communicate with the public. Nothing has been more rewarding than using language to help those in need in the last few years where caring for others goes a long way. [Pictured bottom left]

Alli Rico, she/her

Position: former Public Information Representative

Work done: Managed digital footprint of the Housing Department, including social media and web presence; produced original video and podcast content.

Work done for LAP: Contributed to the development of the LAP

Alli currently lives in Seattle, WA where she works for KCTS 9, the local PBS station, and gets lost in the woods of the Cascade Mountains. [Not pictured]

Jacklyn Joanino-Sipat (she/her/siya) works as a Senior Development Officer for the City of San José Housing Department. She currently leads the Department's Policy, Equity, and Inclusion initiatives. In her role, she coordinates the Department's equity team (known as Housing GARE Team) and works to increase its capacity to advance racial equity in its policies and programs. She supported this project team to develop the new Department Language Access Plan through coordination, research, analysis, and writing. Jacklyn is a 2nd generation Fil-Am. Language justice particularly important to her and her trilingual family. She is passionate about uplifting community members' lived experiences to drive policy making and believes housing is a human right. [Pictured bottom right, small box]