

Language Access Plan



**California Department of Community
Services and Development**

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Introduction

As part of ensuring meaningful access to programs and services, the California Health and Human Services Agency (CalHHS) adopted a Language Access Policy on May 22, 2023, which requires each CalHHS department or office's programs to develop a Language Access Plan. The goal of this work is to ensure that CalHHS and its departments and offices provide meaningful access to information, programs, benefits, and services to people with limited English proficiency (LEP) and ensure that language is not a barrier to accessing vital health and social services.

This document is the Department of Community Services and Development (CSD) Language Access Plan. In developing this Plan, we have reviewed our programs and services for the public, the ways we communicate with members of the public and the people we serve, and how we currently provide information and services in languages other than English.

Department Programs and Services

CSD reduces poverty for Californians by leading the development and coordination of effective and innovative programs for low-income individuals, families, and their communities.

The programs and services we provide to the public or our target service population are:

- The Earned Income Tax Credit (EITC) is widely recognized as one of the nation's most powerful resources for improving the economic stability of low-to-moderate income individuals and families. The California Earned Income Tax Credit (CalEITC) and its federal counterpart provide refundable cashback credits to qualifying working Californians when they file their tax return. CSD administers the CalEITC Education and Outreach Grant Program on behalf of the Franchise Tax Board.
- The Community Services Block Grant (CSBG) is a federally funded grant program that aims to reduce poverty in the United States. CSBG is designed to provide a range of services to assist low-income families and individuals attain the skills, knowledge, and resources necessary to achieve economic security.
- The U.S. Department of Energy's Weatherization Assistance Program (DOE WAP) helps reduce energy usage and costs by providing services intended to improve energy efficiency for eligible low-income households.
- The Farmworker Resource Center Grant Program provided funding to three counties to develop resource centers and programs designed to address the needs of farmworkers and their families.
- The Low Income Home Energy Assistance Program (LIHEAP) is a federally funded program that provides assistance to eligible low-income households

with the goal of managing and meeting their energy costs and immediate home heating and/or cooling needs.

- The Low Income Household Water Assistance Program (LIHWAP) is a limited-term, federally funded program that provides financial assistance to eligible low-income Californians to help manage their residential water utility costs.
- The Low-Income Weatherization Program (LIWP) provides low-income households with solar photovoltaic systems and energy efficiency upgrades at no cost. One of the California Climate Investments, LIWP reduces greenhouse gas emissions by saving energy and generating clean renewable power. LIWP also reduces energy expenses for low-income households, strengthening their economic security.

CSD administers all of its programs through networks of non-profit organizations, local governments and other organizations. Direct contact from the public is made directly to the program service provider as indicated on <https://www.csd.ca.gov/Pages/FindServicesInYourArea.aspx>. CSD also operates a call center for general customer inquiries and to direct clients to the appropriate program service provider for assistance.

Language Access Requirements

In planning for how to provide meaningful language access moving forward, CSD reviewed the following four factors for each of our programs:

1. Number or proportion of LEP persons eligible to be served or likely to be encountered by the program or service;
2. Frequency with which LEP individuals come into contact with the program;
3. Nature and importance of the program, activity, or service; and
4. Resources available to our department and costs of language services.

We have also considered the specific requirements in the CalHHS Language Access Policy and any other program-specific laws or requirements.

- Department of Energy Title VI Implementing Regulations – 10 C.F.R. Part 1040
- Executive Order 13166 (Federal) – “Improving Access to Services for Persons with Limited English Proficiency”
- Executive Order 13985 (Federal) – “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government”
- Executive Order 14012 (Federal) – “Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans”

Please note that this plan does not address CSD’s process for conducting or reporting on the biennial language survey required under the Dymally Alatorre Bilingual Services Act.

Providing Notice to People with LEP and Identifying Language Preference

This section includes how CSD will notify the public about available language access services. Below is a check list of tools CSD may use to notify the public of these services.

- “I Speak” cards or posters at public reception desks
- Translated notices in public waiting areas in the following languages:
- Translated taglines on English language forms
- Translated taglines on department program websites
- Other:

CSD will identify the language preference of consumers with whom it engages in regarding program administration or service delivery, and will document this preference for future reference to address translation and interpretation needs.

Language Services

This section includes the actions CSD will take to provide information and services in languages other than English.

Direct In-Language Communication

CSD has established a systematic process for assigning bilingual staff to communicate effectively with members of the public, consumers, or program participants with LEP when a language need has been identified. The CSD Call Center employs staff bilingual in English and Spanish. Spanish-speaking callers who need language assistance are routed to these CSD staff. CSD also utilizes a Language Line for callers who need assistance in another language. CSD Call Center staff are trained to utilize this Language Line on an as-needed basis.

The assigned bilingual staff, or staff with assistance from an interpreter from the Language Line, are briefed on the programmatic needs of the individual to ensure they are adequately prepared to address any questions or concerns related to the services administered by the department.

Bilingual staff are then scheduled dedicated time with the program participant or member of the public to provide assistance and address their specific needs surrounding the services administered through CSD.

By following this structured process, CSD aims to ensure that individuals with limited English proficiency receive the necessary language assistance and support to fully engage with and benefit from the services offered by the department.

Only certified bilingual staff are permitted to communicate with the public in languages other than English. CSD is committed to maintaining the qualifications of bilingual staff to serve in bilingual positions and receive bilingual pay. To ensure compliance, all bilingual certified employees will undergo retesting every five years. Employees scoring below the equivalent of Interagency Language Roundtable (ILR) scale scores of "3" in speaking and listening must have test scores on file that are not older than five years. These procedures are conducted in accordance with ASTM International (formerly the American Society for Testing and Materials) Standard F2889.

Interpretation

CSD relies on a contracted language interpretation service to facilitate communication during in-person, telephonic, or other remote interactions with the public. This service provides spoken and sign language interpretation to ensure effective communication with individuals with LEP or those who are deaf or hard of hearing.

Staff members are equipped with access to interpretation resources and provided with clear procedures for utilizing these services. This includes guidelines on how to request interpretation support, how to access the contracted service, and how to effectively communicate with interpreters to ensure accurate and culturally appropriate exchanges.

Translation

CSD assessed each public-facing document to determine if it qualifies as a vital document crucial for program participation. This evaluation process ensures that individuals can access essential information necessary for engaging in departmental programs and services. As new forms are developed, they undergo similar scrutiny to ascertain their importance and whether they qualify as vital documents.

Furthermore, the department utilizes available data to determine the languages which these vital documents should be translated to ensure accessibility for members of the public. This determination is based on factors such as demographics, language data, and community needs. For reference, please consult the Vital Documents Table located on page 10, which outlines the list of vital documents and the corresponding languages into which they are translated.

CSD categorizes "essential website content" as information that is critical for public access and understanding of departmental programs, services, and resources. This includes:

- Program eligibility criteria: Information detailing who is eligible to participate in departmental programs and the requirements for qualification.
- Service descriptions: Descriptions of the various services offered by the department, including their objectives and benefits.
- Contact information: Contact details for relevant points of contact for inquiries, assistance, or feedback.

- Language access resources: Information on language access services available to individuals with limited English proficiency or those who are deaf or hard of hearing, including interpretation and translation services.
- Rights and responsibilities: Information outlining the rights, responsibilities, and obligations of program participants or recipients of departmental services.

The department ensures that its online platform effectively communicates vital information to the public, promotes transparency, and facilitates access to departmental resources and services.

CSD has established a comprehensive process for responding to written communications from LEP individuals in languages other than English. The procedure includes the following steps:

- Receipt and Identification: Upon receiving written communications in a language other than English, the department's staff identifies the language and determines whether the communication is from an LEP individual.
- Language Access Resources: Staff members then access language resources, including translation services or bilingual staff, to assist in understanding the content of the communication.
- Translation or Interpretation: Depending on the nature and complexity of the communication, the department may opt for translation of the written document into English or interpretation services to facilitate understanding and response.
- Response Preparation: Staff members draft a response to the written communication in English, ensuring clarity, accuracy, and adherence to departmental policies and procedures. The response is then translated into the LEP person's identified language before sending for review and approval.
- Review and Approval: The drafted response undergoes review and approval by designated personnel within the department to verify accuracy, appropriateness, and compliance with language access requirements.
- Delivery of Response: Once approved, the response is delivered to the LEP individual through the appropriate channels, such as mail, email, or other electronic platforms, ensuring timely and effective communication.
- Follow-Up and Documentation: The department may follow up with the LEP individual to address any further questions or concerns and maintains documentation of all communications and interactions for record-keeping and compliance purposes.

Training Staff

This section includes information on how CSD's staff are trained to provide language access services to the public.

Training Plan

Public Facing Employees

Language access training will be provided to all current public-facing employees no later than December 1, 2024, and at least annually thereafter. New staff hired into public contact positions will receive language access training within their first 6 months of employment.

To achieve this objective, the department has implemented a comprehensive training program covering the following key topics for public-facing employees:

- **CalHHS Language Access Policy:** Employees will receive training on the California Health and Human Services Agency (CalHHS) language access policy, which outlines the department's commitment to providing meaningful access to services for individuals with LEP.
- **Familiarization with Language Access Plan:** Employees will receive an overview of the department's Language Access Plan, including its objectives, scope, and key provisions. This will ensure that all staff members understand the department's commitment to providing language assistance services to individuals with Limited English Proficiency (LEP).
- **Identifying Language Preferences:** Training will focus on techniques for identifying an individual's language preference when they communicate with the department, whether in person, over the phone, or through written correspondence.
- **Processes and Procedures:** Employees will be familiarized with the department's processes and procedures for providing language assistance services, including accessing interpretation and translation resources and complying with relevant laws and regulations, and the complaint process.
- **Working with Interpreters:** Staff will receive training on how to effectively work with interpreters, both in person and via telephone or video conferencing platforms. This includes best practices for communication, maintaining confidentiality, and ensuring accuracy in interpretation.

In addition to the foundational training provided to all public-facing employees, more in-depth training will be offered to staff members in high public contact areas, such as Call Center staff. This specialized training will provide additional knowledge and skills tailored to the unique challenges and demands of these roles, ensuring that employees are well-equipped to assist LEP individuals effectively and efficiently.

Non-Public Facing Employees

This section describes CSD's plan for training employees who are not in public contact positions.

The department's training program for non-public facing employees will cover the following key areas:

- **Familiarization with Language Access Plan:** Employees will receive an overview of the department's Language Access Plan, including its objectives, scope, and key provisions. This will ensure that all staff members understand

the department's commitment to providing language assistance services to individuals with Limited English Proficiency (LEP).

- Overview of Translated Documents: Training will include an overview of documents that have been translated into languages other than English, as well as the process for determining which documents are considered vital and require translation. This will help employees understand the importance of providing language access to essential information and resources, provide awareness of how to locate the translated documents.
- Identification of Bilingual Staff: Employees will learn how to identify bilingual staff members within the department who can assist with language interpretation and translation as needed. This will ensure that employees know where to turn for language assistance when working with LEP individuals.
- Complaint Process: Training will cover the department's complaint process for language access issues, including how to recognize and address complaints related to language assistance services. Employees will learn the steps to take if they encounter a language access barrier or receive a complaint from an LEP individual.
- Role of Language Access Coordinator: Employees will be introduced to the department's Language Access Coordinator and their role in overseeing language access initiatives. This will help employees understand who to contact for guidance and support regarding language access issues.

Monitoring and Updating Language Access Plan

This section describes how CSD will monitor language access services and update this Language Access Plan at least every two years. This information will ensure that CSD is compliant with the CalHHS Language Access Policy and address processes and procedures being used to deliver meaningful language access to members of the public and recipients of services.

CSD will create a monitoring program or process to ensure implementation of details included in the Language Access Plan. This process will entail:

- Assessing training effectiveness
- Identification of training needs
- Assessing employee awareness of language access policies and procedures
- Assessing effectiveness of interpretation and translation services
- Check-in with community partners and stakeholders
- Tracking costs of providing language access services
- Data collection
 - Identifying amount and type of language services (interpreter services, sight translations) available to consumers by program

Every two years, CalHHS will generate and update the list of minimum threshold languages for the translation of vital documents and essential web content. Consistent with CalHHS Policy, CSD's Language Access Plan will be reviewed, revised if

necessary, and resubmitted to CalHHS every two years. Revisions will address any changes in the Title VI four-factor analysis; whether existing policies and procedures are meeting the needs of LEP individuals; whether staff is sufficiently trained; and whether identified resources for assistance are up-to-date, available, accessible, and viable.

Reevaluations will incorporate, as appropriate, new programs, new legal requirements, additional vital documents, and community input on the Language Access Plan.

Complaint Process

Members of the public or recipients of services should direct complaints regarding language access to:

Complaint Process Contact Name: CSD Call Center
Phone / Email: (866) 675-6623

