

**City of Stockton
Economic Development Department**

Language Access Plan



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I. Language Access Plan Overview

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

In accordance with federal, state and local law, specifically Executive Order 13166, Housing and Urban Development (HUD) Limited English Proficiency (LEP) Guidance, and Section 7290 et seq. of the California Government Codes (“Dymally-Alatorre Bilingual Services Act”), the City of Stockton’s Economic Development Department (EDD or Department) will provide meaningful access to persons with LEP for its HUD-funded programs and activities and undertake reasonable efforts to provide or arrange free language assistance for LEP applicants or participants.

Policy Statement

It is EDD’s policy to provide timely, meaningful access for persons with LEP to all HUD-funded EDD programs, services, and activities. Individuals who have a limited ability to read, speak, write, or understand English may be entitled to free language assistance with respect to a particular type of service, benefit, or encounter. EDD will provide free language assistance services to persons with LEP whenever an individual with LEP requests language assistance services.

EDD’s Language Access Plan (LAP) will be publicly available on the EDD website at www.stocktonca.gov/EDD or from the EDD’s main office upon request. EDD continuously seeks to improve and expand the services it provides to enable persons with LEP to communicate with the EDD in person, over the telephone, in writing, or through electronic forms. EDD will re-evaluate the LAP as needed or at least every five years to maintain compliance with the requirements set forth in Executive Order 13166 and other LEP related guidance, and to ensure that the LEP communities have continuous, meaningful access to HUD-funded EDD programs, services, and activities.

Purpose and Authority

The purpose of this language policy and Language Access Plan (LAP) is to establish effective guidelines, in accordance with federal and state requirements, for EDD personnel to follow when providing services to, or interacting with persons with LEP to ensure all persons have meaningful access to HUD programs and activities administered by EDD.

II. Plan Development and Implementation

The goal of language access planning and implementation is to ensure that EDD provides meaningful access to all HUD-funded EDD activities, services, and programs to individuals with LEP and ensure effective communication at all points of contact.

Implementation includes the dissemination and accessibility of the LAP to all personnel within EDD, and ensure it is available to applicants, assisted families, and the public upon request.

Further implementation of the LAP includes providing appropriate language assistance services to the LEP population EDD serves, including oral interpretation, bilingual staff, written translation services, and notice of availability of LEP services.

III. Needs Assessment: Four Factor Analysis

EDD regularly assesses whether the needs of current and potential program participants are met and works to identify the agency's capacity to meet these needs in accordance with the policies outlined in this plan. These self-assessments assist EDD in identifying language barriers that may delay effective oral and written communication between EDD and persons with LEP.

Language data from the U.S. Census Bureau's American Community Survey (ACS) was used to identify the languages spoken in limited English-speaking households in Stockton (see Table 1 below). This data assisted EDD in determining the extent to which services are needed in various languages and to ensure EDD is meeting the needs of the people with LEP whom it serves.

HUD's LEP guidance sets forth a four-factor analysis to use to determine the extent of EDD's commitment to provide services to individuals with LEP. This LAP used the four-factor analysis to determine the appropriate language assistance services to ensure that persons with LEP have meaningful access to EDD's HUD-funded services, activities, and programs.

Factor 1: Determine the number or proportion of LEP individuals in the eligible service population.

An analysis of data from the U.S. Census Bureau's 2023 American Community Survey (ACS) 1-Year Estimates Detailed Household Language by Household English Limited English-Speaking Status (Table S16002) shows the following for Stockton:

Top Language groupings of Limited English Speaking Households	Limited English Speaking Households	Percentage of Limited English Speaking Households Compared to Stockton Total
Spanish	6,934	6.8%
Chinese (incl. Mandarin, Cantonese)	1,061	1.04%
Vietnamese	489	0.48%
Tagalog	195	0.19%
Total	8,679	101,924
English Only	44,919	44.07%

Table 1 – Limited English Speaking Households in Stockton, CA

Source: [US Census Bureau, 2023: ACS 1-Year Estimates Subject Tables, S16002- Detailed Household Language by Household English Limited English-Speaking Status](#)

Key findings:

- **Limited English Proficiency in Spanish:** This data shows that Spanish speaking residents of Stockton comprise the highest numbers of those needing language access.
 - **Nearly 7,000 Households:** Approximately 6,934 Spanish-speaking households reported speaking English less than very well.
 - **Almost 7% of the total Stockton Households:** Spanish-speaking households that have limited-English skills constitute 6.8% of the total number of households in Stockton.
- **Limited English Proficiency in Other Asian Languages:** The analysis revealed a considerable number of Limited English speaking households in Chinese languages (including Mandarin and Cantonese), Vietnamese, and Tagalog.
 - **More than 1,000 Limited English Speaking Chinese households:** 1,061 households reported speaking English less than very well in Chinese-language speaking households, including Mandarin and Cantonese.
 - **Nearly 500 Limited English Speaking Vietnamese households:** 489 households reported speaking English less than very well in Vietnamese-speaking households.
 - **Nearly 200 Limited English Speaking Tagalog households:** 195 households reported speaking English less than very well in Tagalog-speaking households.
- **Supporting Evidence:** This analysis aligns with the City of Stockton EDD's experience and current practices serving LEP residents and resonates with the feedback provided by local community organizations.

Factor 2: The frequency LEP individuals encounter the program.

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

The percent of households EDD serves with Spanish identified as their preferred language is significantly smaller than the 6.8% of Spanish-speaking households identified in the 2023 Census estimates. EDD staff encounter Spanish speaking participants and members of the public on an infrequent basis. Despite this, staff will continue to monitor the frequency of calls from Spanish-speaking members of the public to monitor the efficiency of the LAP and identify best practices moving forward.

Factor 3: The nature and importance of the program, activity, or service provided by EDD to LEP individuals.

To fully benefit from our programs, all participants and members of the public, regardless of their preferred language, should have the ability to understand EDD programs, services, and

activities. Additionally, a clear understanding of program requirements and regulations is crucial for obtaining services, adhering to participant obligations, and maintaining program eligibility. The more important the activity, or the greater the possible consequences of the contact to LEP persons, the more likely the need for language services. As a measure for determining whether a document requires translation, EDD considers the threshold of a “vital document.” Per the HUD guidance, “vital documents” are those that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically.

Factor 4: Determine the resources available to assist LEP individuals.

To identify resources for Limited English Proficient (LEP) individuals, EDD explored cost-effective methods for delivering language services. EDD utilizes qualified translation services for vital and non-vital document translations and certified translation/interpretation services for oral interpretations when needed. These services ensure translators/interpreters meet the qualifications necessary to provide EDD with timely and accurate translators/interpreters services. EDD employs certified staff who frequently review vendor translated documents for accuracy.

Reasonable steps to provide language access may cease to be reasonable when costs substantially exceed the benefits. However, EDD will utilize strategies to maximize services and minimize costs when necessary, such as centralizing, sharing, or contracting interpretation and translation services with other City departments or neighboring jurisdictions to achieve economies of scale.

Providing LEP Assistance

EDD has implemented and will continue to implement the following actions to provide resources for LEP individuals:

- Hiring and training bilingual staff.
- Offering third-party interpretation services over the phone at no cost to LEP individuals when necessary.
- Utilizing written translation services to produce materials in Spanish.
- Providing Spanish interpretation services for in-person and virtual public meetings, as well as other languages upon request.
- Training public-facing employees on the available EDD language assistance services.

EDD will also explore procuring third-party interpretation services to support these efforts.

IV. Language Assistance Services and Translations

EDD staff will assist persons with LEP who cannot read their preferred language to the same extent as staff would assist English-speaking clients who cannot read English. EDD arranges translation and interpretation services as needed for those who do not speak English and uses professional translation services to ensure persons with LEP have meaningful access to equitable, timely, and high-quality language assistance services.

EDD employs staff who are bilingual in Spanish and English. Bilingual skills are certified through formal testing methods. This process is administered by the standard testing program

through the Personnel Department of the City of Stockton. EDD's bilingual staff ensures our ability to respond to individuals with LEP via phone, in-person contact and through written communications in Spanish. To further ensure meaningful accessibility, the EDD website has a language option that directs individuals with LEP to EDD information translated to 80 languages.

V. Staff Training

All EDD staff are made aware of the Department's language access requirements and provided with this plan. Newly hired staff are also trained in EDD's language access requirements as part of their orientation. Staff receive on the job training on EDD's programs, activities and services for persons with LEP.

The Language Access Plan will be:

- Distributed to all supervisors and staff in positions that are likely to come in contact with members of the public and program participants.
- Available at the EDD main office.
- Posted on the EDD website.
- Explained in orientation and training sessions for supervisors and other staff who need to communicate with people with LEP.
- Placed in EDD's shared forms and procedures directory so all staff have access to the LAP as needed.

Staff are instructed to arrange for a professional interpreter through a Work Order Request Form submitted to administrative staff when an applicant or participant speaks a language other than English.

VI. Vital Document Translation (Safe Harbor Provisions)

EDD provides written translations of vital documents for each eligible LEP language group that constitutes 5 percent (5%) or 1,000 individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

EDD has determined that because there are more than 5% and more than 1,000 Spanish-speakers in Stockton who speak English "less than very well," vital documents will continue to be translated into Spanish as needed. As of the date of this LAP publication, Spanish is the only language into which vital documents are translated. However, vital documents will be translated into other languages on an as-needed basis and upon request.

EDD has determined which vital documents are critical for ensuring meaningful access or awareness of rights or services, by beneficiaries or potential beneficiaries generally and persons with LEP specifically.

Vital forms and documents include, but are not limited to:

1. Pre- and Initial Applications to receive EDD benefits and services, including program guidelines and fact sheets.
2. Consent and Complaint forms.
3. Written Notices of rights, obligations, denial, loss, or decreases in benefits or services, and public hearings.
4. Letters from EDD asking the applicant, recipient, or participant to take action.
5. Any other document considered vital by EDD staff.

VII. Availability of Language Assistance at No Cost

All EDD staff are responsible for ensuring all persons accessing EDD programs, activities, and services, including people with limited English proficiency (LEP), are treated fairly. EDD shall provide meaningful access to equitable, timely, and quality language assistance services to individuals with LEP.

EDD shall:

- Post signs in all areas accessible by visitors and program participants.
- Make this Language Access Plan available on the EDD website at www.stocktonca.gov.

VIII. Monitoring and Updating the Language Access Plan (LAP)

EDD is committed to ensuring people with Limited English Proficiency (LEP) have equal access to all EDD programs and services.

EDD shall:

- **Re-evaluate the LAP every five years:** EDD will review this plan as needed but at least every five years to ensure individuals with LEP have continuous, meaningful access to equitable, timely, and quality language assistance services.
- **Maintain compliance with Executive Order 13166:** EDD will ensure this LAP meets the requirements of this law.
- **Other LEP related guidance:** EDD will ensure this LAP complies with other federal and state guidelines that address how to serve LEP communities and consider these guidelines when updating this LAP.
- **Ensure LEP communities have continuous meaningful access:** EDD is committed to ensuring persons with LEP have equitable access to our programs, services, and activities and can achieve meaningful participation. This commitment includes providing translated vital and non-vital documents, access to interpreters, and employing bilingual staff.

By regularly reviewing the Language Access Plan, EDD can continuously provide LEP communities equal opportunities and access all HUD-funded EDD programs and services, contributing to a more just and equitable Stockton that empowers all community members.

IX. Definitions

- **Bilingual/Multilingual Staff:** A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding Spanish.
- **Interpretation:** The act of listening to a communication in one language and orally converting it to another language while retaining the same meaning.
- **Language Access:** Is achieved when persons with LEP can communicate effectively with EDD employees and participate in EDD programs and activities.
- **Persons with Limited English Proficient (LEP):** Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Persons with LEP may be competent in English for certain types of communication but still be LEP for other purposes.
- **Meaningful Access:** Language assistance that results in accurate, timely, and effective communication at no cost to the person with LEP. For persons with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- **Preferred/Primary Language:** The language that a person with LEP identifies as the preferred language that he or she uses to communicate effectively.
- **Program or Activity:** The term “program or activity” and the term “program” mean all the operations of EDD.
- **Translation:** The replacement of written text from one language into an equivalent written text in another language.
- **Vital Documents:** Paper or electronic written material that contains information that is critical for accessing EDD programs or activities or is required by law. Vital documents include, for example: applications, guidelines, model leases, disaster planning formation, consent, and complaint forms; notices of rights and disciplinary action; notices advising persons with LEP of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services.