



# CITY OF SANTA ANA

---

## Limited English Proficiency Plan CDBG, HOME, ESG 2020-2021 through 2024-2025

**CITY OF SANTA ANA  
LIMITED ENGLISH PROFICIENCY PLAN**

**A. PLAN PURPOSE**

This Limited English Proficiency (LEP) Plan is established pursuant to and in accordance with Executive Order 13166, "Improving Access to Services for Persons With Limited English Proficiency," Title VI of the Civil Right Act of 1964, and the Department of Housing and Urban Development's (HUD) Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, dated January 22, 2007, and effective February 21, 2007.

LEP persons are those whose proficiency in speaking, reading, writing, or understanding English is such that it would deny or limit their meaningful access to federally conducted and federally assisted programs and activities provided by the City of Santa Ana, if language assistance were not provided.

Executive Order No. 13166 was adopted to ensure meaningful access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency.

**B. CITY POLICY**

The City is committed to ensuring that programs and resources are accessible to LEP persons, without discrimination on the basis of national origin. The City is further committed to providing translation assistance to LEP persons whose primary language constitutes 5 percent or more of the City of Santa Ana population.

**C. FOUR-FACTOR ANALYSIS**

As a recipient of federal funding, the City is required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The following four-factor analysis is the starting point for creating a Plan which balances LEP needs and assistance measures provided:

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

According to the 2013-2017 American Community Survey (ACS) 5-Year Estimates, Santa Ana has a population of 332,725. Approximately 54.8 percent of its residents are native born and the remaining 45.2 percent are foreign born.

The population of Santa Ana is a multi-culturally diverse community. Racial and ethnic minorities represent a fast growing segment of the population. The 2013-2017 American Community Survey 5-Year Estimates reflect that approximately 9.4 percent of the population is non-white. Hispanics of any race are the largest ethnic group, comprising 77.3 percent of the population, along with Asians (11.6%), Black or African Americans (1.0%), and American Indian and Alaska Natives (0.6%).

Of critical concern for the development of this LEP Plan is the language spoken at home, which as reflected in the U.S. Census (2013-2017 American Community Survey 5-Year Estimates) is detailed as follows:

<b>LANGUAGE SPOKEN AT HOME</b>		
	<b>Number</b>	<b>Percent</b>
<b>Population 5 years of age and over</b>	<b>308,938</b>	<b>100.0</b>
English only	57,404	18.6
Language other than English	251,534	81.4
Speak English less than "very well"	130,657	51.9
Spanish	215,988	69.9
Speak English less than "very well"	109,590	50.7
Other Indo-European languages	2,419	0.8
Speak English less than "very well"	706	29.2
Asian and Pacific Islander languages	32,429	10.5
Speak English less than "very well"	20,211	62.3
Other Languages	698	0.2
Speak English less than "very well"	40	21.5

HUD has provided "safe harbor" guidance which establishes language group size thresholds as the basis for determining the minimum required written materials LEP assistance.

<b>Size of Language Group - Recommended Provision of Written Language Assistance</b>	
1,000 or more in the eligible population in the market area or among current beneficiaries.	Translate vital documents.
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number.	Translate vital documents.
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number.	Translate written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries <i>and</i> less than 1,000 in number.	No written translation is required.

**ANALYSIS**

The above U.S. Census table reflects that Spanish is the largest language group which may require the provision of LEP assistance, with 69.9 percent of the City population over the age of five indicating the primary use of Spanish at home, and 51.9 percent of this defined City population

indicating that they speak English “less than very well.” The 130,657 persons indicating that they speak English less than “very well” exceeds the 1,000-person threshold established under HUD’s safe harbor guidance, as well as the corresponding 69.9 percent of the defined population exceeding the 5 percent safe harbor threshold. Based on these findings, the translation of vital documents into the Spanish language is required.

While the number of persons speaking Asian and Pacific Islander languages at home totals 32,429, it is important to note that 20,211 persons (62.3% of the language group) indicated that they spoke English less than “very well”, exceeds the 1,000-person threshold established under HUD’s safe harbor guidance, as well as the corresponding 10.5 percent of the defined population exceeding the 5 percent safe harbor threshold. Based on these findings, the translation of vital documents into the Vietnamese language is required.

Further examination of the 2013-2017 American Community Survey 5-Year Estimates data reflects the following Asian race distribution for the City of Santa Ana:

<b>Asian, Hawaiian, and Pacific Islander Race Distribution</b>				
	<b>Number</b>	<b>Percentage of Total Population</b>	<b>Percentage of Asian, Hawaiian and Pacific Islander Race Population</b>	<b>Prorated Distribution of Asian, Hawaiian and Pacific Islander That Speak English Less Than Very Well</b>
<b>Asian, Native Hawaiian and Other Pacific Islander</b>	<b>39,566</b>	<b>11.82</b>	<b>100.00</b>	<b>24,649</b>
Asian-Indian	592	0.18	1.50	369
Chinese	3,307	0.99	8.36	2,060
Filipino	3,229	0.97	8.16	2,012
Japanese	665	0.20	1.68	414
Korean	914	0.27	2.31	569
Vietnamese	26,099	7.80	65.96	16,259
Other Asian	3,845	1.15	9.72	2,395
Native Hawaiian	110	0.03	0.28	69
Guamanian or Chamorro	28	0.01	0.07	17
Samoan	679	0.20	1.72	423
Other Pacific Islander	98	0.03	0.25	61

Considering the distribution reflected in the table above, the Vietnamese race with approximately 26,099 persons is the largest Asian population in this City. The Vietnamese race also constitutes 65.96 percent of the Asian, Hawaiian and Pacific Islander race population. Historic CDBG program

inquiries, utilization, and outreach have reflected Spanish to be the largest language group in need of LEP assistance.

**2. The frequency with which LEP persons come into contact with the program.**

The City of Santa Ana annually conducts a wide variety of programs utilizing HUD funding resources. While programs and their respective funding levels vary from year to year, the general range of activities has remained relatively consistent. Based on this historical consistency, this LEP Plan is designed to be effective for the period between 2019-2020 and 2024-2025. In the event that projects or programs are HUD funded, and not adequately considered under this LEP Plan, an amendment to the Plan shall be performed to appropriately consider and address the program year activities. Program Year (PY) 2019-2020 activities included the following:

<b>PY 2019-2020 CDBG Program Activity</b>	<b>Budget</b>
<b>CDBG Administration</b>	
CDBG Program Administration	\$ 1,080,230
Fair Housing Services	\$ 60,000
<b>Sub-Total</b>	<b>\$ 1,140,230</b>
<b>CDBG Public Service Activities</b>	
America on Track	\$ 45,000
Boys & Girls Club of Santa Ana	\$ 40,000
Charitable Ventures of OC	\$ 30,000
Community Action Partnerships	\$ 30,000
Community Health Initiative Orange County	\$ 30,000
Court Appointed Special Advocates	\$ 30,000
Delhi Center (Family Economic Success Initiative)	\$ 93,205
Delhi Center (Teens Engaged in Learning and Leadership)	\$ 68,461
Delhi Center/ALBI	\$ 61,557
Heritage Museum of Orange County	\$ 31,320
Legal Aid Society of OC (Domestic Violence Prevention Project)	\$ 38,000
Lutheran Social Services of So. Cal.	\$ 30,000
Nati's House (dba Neutral Ground) SNL	\$ 60,000

<b>PY 2019-2020 CDBG Program Activity</b>	<b>Budget</b>
OC Children's Therapeutic Arts Center	\$ 70,000
Public Law Center (Consumer)	\$ 30,000
Public Law Center (Housing)	\$ 30,000
Second Chance Orange County	\$ 50,000
Taller San Jose Hope Builders	\$ 30,000
The Cambodian Family	\$ 45,000
YMCA	\$ 30,000
<b>Sub-Total</b>	<b>\$ 872,543</b>
<b>CDBG Non-Public Service Activities</b>	
Code Enforcement	\$ 790,664
Economic Development	\$ 72,926
Park Improvements	\$ 1,435,000
Residential Street and Infrastructure Improvements	\$ 2,207,138
Neighborhood Sponsored Improvements	\$ 50,000
Single Family Rehab-City	\$ 300,000
Multi Family Rehab	\$ 175,000
Homebuyer Down Payment Assistance	\$ 160,000
<b>Sub-Total</b>	<b>\$ 5,190,728</b>
<b>CDBG TOTAL</b>	<b>\$ 7,203,501</b>

<b>PY 2019-2020 HOME Program Activity</b>	<b>Budget</b>
<b>HOME Administration</b>	
HOME Program Administration	\$ 170,425
<b>Sub-Total</b>	<b>\$ 170,425</b>
<b>CHDO Activity</b>	
HOME CHDO Project	\$ 591,062
<b>Sub-Total</b>	<b>\$ 591,062</b>
<b>HOME Activities</b>	
Single-Family Residential Rehabilitation Program	\$ 100,000
Multi-Family Residential Rehabilitation Program	\$ 4,149,060
<b>Sub-Total</b>	<b>\$ 4,249,060</b>
<b>HOME TOTAL</b>	<b>\$ 5,010,547</b>

<b>PY 2019-2020 Emergency Solutions Grant</b>	<b>Budget</b>
<b>ESG Administration</b>	
ESG Program Administration	\$ 37,018
<b>Sub-Total</b>	<b>\$ 37,018</b>
<b>ESG Activities</b>	
Interval House	\$ 36,315
WISEPlace	\$ 31,128
Mercy House	\$ 316,491
HEART	\$ 51,880
2-1-1 Orange County	\$ 20,750
<b>Sub-Total</b>	<b>\$ 456,564</b>
<b>ESG TOTAL</b>	<b>\$ 493,582</b>

For CDBG funded activity, the Park Improvements, Residential Street and Infrastructure Improvements, and the Neighborhood Sponsored Improvements will not entail participatory contact with LEP persons.

The Fair Housing Services, Public Services activities, Code Enforcement Program, Residential Rehabilitation programs, and Santa Ana’s Economic Development programs have the greatest expectation of contact with LEP persons. Consequently, the City has an enhanced obligation to ensure reasonable access to these programs and services for LEP persons.

For HOME funded activities, the Residential Rehabilitation Program has the greatest expectation of contact with LEP persons, requiring that the City ensure reasonable access to this program to LEP persons.

The HOME funded Community Housing Development Organization (CHDO) project has programmed funding, however the scope of the project has not been determined. LEP assistance may be needed depending on how the project is structured.

The above data, staff experiences, and program participation data reveal that the greatest need for LEP assistance is within the Spanish speaking community.

**3. The nature and importance of the program, activity, or service provided by the program to people’s lives.**

CDBG and HOME funded activities positively impact the lives of all of the City’s residents. However, as previously discussed, there are a number of federally funded activities which provide direct benefits to participants:

Program	Benefits
CDBG - Fair Housing Services	Resolution of discriminatory acts to ensure equitable access to decent housing
CDBG - America on Track	Brighter Futures for Children of Prisoners
CDBG – Boys and Girls Club	College Bound program for youth
CDBG – Charitable Ventures of OC	Summer Night Lights program for families
CDBG – Community Action Partnership of OC	Economic Empowerment – Your Money Your Goals
CDBG – Community Health Initiative of OC	Community Health Access program
CDBG – Court Appointed Special Advocates	Transitional Age Youth Foster Program
CDBG – Delhi Center/CIELO	Family Economic Success initiative
CDBG – Delhi Center	Teens Engaged in earning and leadership
CDBG – Delhi Center/ALBI	School Break Enrichment program



<b>Program</b>	<b>Benefits</b>
CDBG – Heritage Museum of OC	The Borrowing Barn
CDBG – Community Legal Aid	Domestic Violence program
CDBG – Lutheran Social Services of OC	Victims Intervention Program
CDBG – Nati’s House	Summer Night Lights for families
CDBG – OC Children’s Therapeutic Arts Center	Willard Neighborhood Crime Prevention and Intervention program
CDBG – Public Law Center	Community Development Consumer and Organizations Program
CDBG – Public Law Center	Community Development Housing Program
CDBG – Second Chance Orange County	More Second Chances Drug Recovery
CDBG – Taller San Jose Hope Builders	Business Applications
CDBG – The Cambodian Family	Plan Ahead Youth Program
CDBG – YMCA of OC	YMCA Financial Assistance Program
CDBG – City of Santa Ana Code Enforcement	Enforcement of code requirements, educational materials and advisement to business and homeowners about code violations
CDBG – City of Santa Ana Single Family Residential Rehabilitation Program	Preservation of the quality of existing affordable housing stock for income qualified households
CDBG – City of Santa Ana Multi-Family Residential Rehabilitation Program	Preservation of the quality of existing affordable housing stock for income qualified households
CDBG – Economic Development	Provides technical assistance for the creation and expansion of small businesses through the implementation of a microenterprise technical assistance program.
HOME – City of Santa Ana Residential Rehabilitation Program	Preservation of the quality of existing affordable housing stock for income qualified households

The CDBG Administration project provides administrative oversight, and as such is responsible for the citizen participation process for federally funded activities.

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

The City of Santa Ana currently has bilingual (English/Spanish) staff available for the provision of interpretation services in all facilities where the City is the direct provider of federally funded services.

Based on the presence of bilingual staff and consultants, in addition to interpretation (oral) services, translation (written) services are also available for any required documents grantees/recipients utilize for their programs.

#### **D. PLAN TO INCREASE LEP RESOURCES**

Based on the foregoing “Four Factor Analysis,” the greatest need for LEP resources is for the provision of Spanish language services. In an effort to meet these needs, the City will provide the following:

1. While interpretation services are widely available at the various venues providing services, enhanced efforts are required in the provision of translation services for vital federally funded program documents.

Vital documents are those that contain information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include but are not limited to outreach materials, applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services.

The City will perform written Spanish translations for all documents deemed vital for each program offered. Where HUD or other forms have been translated, and participant signature is required, the participant shall sign the English version of the form as the legally binding document, with the Spanish language translation attached. Translations which require signature shall carry the disclaimer that: “This document is a translation of a HUD-issued and/or required document. This translation is provided to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document.”

2. Provide annual staff training on the requirements of this plan, and its effective implementation at the staff, program, and project level; inclusive of resources available, sensitivity to LEP persons, and referral resources.
3. Insert “tag lines” on all printed outreach materials indicating the availability of translation and interpretation services by the City.
4. Continue to provide Spanish language interpretation services as necessary to ensure access by LEP persons in all federally funded activities. Both Housing Division staff members are bilingual and one of the two CDBG staff is bilingual.
5. Explore access to community based services which provide needed translation and interpretation services for non-Spanish speaking LEP persons.

Grantees/subrecipients will also provide the following to meet the City’s needs in providing LEP resources:

1. Ensure that the City’s LEP plan is implemented in outreach efforts and in the provision of services.

2. Communicate with City staff regarding any required modifications to the LEP based on program implementation and participant experiences.

**E. PLAN MONITORING AND UPDATE**

For the term of this LEP Plan, it shall be reviewed annually to ensure conformance with the all statutory requirements, monitor changes in the language characteristics of its population, evaluate its effectiveness, and modify as necessary to accommodate changes to federally funded programs and projects.