



CITY OF HAWTHORNE

Language Access Plan

April 2025

Executive Summary

As a recipient of federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds, the City of Hawthorne (“City” or “Hawthorne”) is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the City’s programs and activities. Meaningful access is defined as language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (LEP), Title VI of the Civil Right Act of 1964, provides the basis for these requirements.

To ensure the appropriate targeting of resources, the City conducted a “Four Factor Analysis” in accordance with U.S. Department of Justice LEP Guidance; evaluating: 1) the number or proportion of LEP persons in the population to be served, 2) the frequency with which LEP persons come into contact with the program activity or service, 3) the importance of the service, information, program, and/or activity, and 4) the resources, financial and human, available to the City. The analysis was conducted in the context of “safe harbor” thresholds provided by the U.S. Department of Housing and Urban Development (HUD).

After determining the applicable language groups that may require LEP assistance, a review of HUD-funded programs and services was conducted, along with the relationship of those programs and services to the target populations. A final analysis was then conducted to determine available staffing and other resources to meet LEP needs for translation services.

A Language Access Plan (LAP) was then developed, focused on the provision of translation and interpretation services to LEP individuals who speak the following languages:

1. Spanish

Through the Language Access Plan, the City commits to continuing language assistance efforts already being conducted and exploring alternative means of providing services to LEP persons, including but not limited to the following:

1. Providing interpretation and translation services to LEP individuals;
2. Providing notices to LEP individuals advising of the availability of free translation and interpretation services provided by the City;
3. Training staff on the requirements of the City’s LAP.

Plan Purpose

As a recipient of federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds, the City of Hawthorne (“City” or “Hawthorne”) is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the City’s federally funded programs and activities. Meaningful access is defined as language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual.

This Language Access Plan (LAP) 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 programs and services provided by the City 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 their national origin, are limited in their English proficiency. National origin discrimination has been interpreted broadly to include the denial of meaningful access to a program because of an individual’s, or their ancestors’, place of origin. This includes whether that person has the physical, cultural, or linguistic characteristics of a national origin group.

City Policy

The City of Hawthorne 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 for whom the population speaking their primary language constitutes at least 1,000 persons or five percent of the City’s eligible population.

Needs Assessment: 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 addresses LEP needs and provides adequate language assistance:

Factor 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 U.S. Census Bureau’s 2018-2022 American Community Survey (ACS) 5-Year Estimates, over half (57 percent) of Hawthorne’s population 5 years of age and over speak a language other than English at home. Of critical concern for the development of this Plan is the language spoken at home by individuals who speak English less than “very well”, which is demonstrated in the table below:

Language Spoken at Home, City of Hawthorne		
Population 5 years of age and over	Number	Percent
	81,120	100.00%
English only	34,566	42.61%
Language other than English	46,554	57.39%
Speaks English less than “very well”	17,431	21.49%
Spanish	38,135	47.01%
Speaks English less than “very well”	14,639	18.05%
Other Indo-European languages	1,954	2.41%
Speaks English less than “very well”	724	0.89%
Asian and Pacific Islander languages	3,147	3.88%
Speaks English less than “very well”	1,318	1.62%
Other languages	3,318	4.09%
Speaks English less than “very well”	750	0.92%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates (Table S1601)

HUD has provided “safe harbor” guidance to determine when to provide translation of vital documents. The Safe Harbor rule for written translation of vital documents is based on the number and percentages of the eligible population in a service area, or current LEP beneficiaries and applicants.

Per the Safe Harbor rule, HUD expects translation of vital documents to be provided when the eligible LEP population in the service area or current beneficiaries exceed 1,000 persons, or if it exceeds 5 percent of the eligible population. In cases where more than 5 percent of the eligible population speaks a particular language but fewer than 50 people are affected, there should be a translated written notice of the person’s right to an oral interpretation. The table below shows the recommended language assistance that should be provided based on the size of the language group:

Safe Harbor Guidance: Size of Language Group and Recommended Provision of Language Assistance	
1,000+ of the eligible population in the service area, or among current beneficiaries	Translate vital documents
> 5% of the eligible population or beneficiaries, and 50+ in number	Translate vital documents
> 5% of the eligible population or beneficiaries, and 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, and less than 1,000 in number	No written translation is required

Analysis

The relevant data in the “Language Spoken at Home” table, above, are summarized in the following table:

Speak English less than “very well”		
Language Spoken at Home	Population 5 years and over	% of Eligible Population
Spanish	14,639	18.05%
Other Indo-European languages	724	0.89%
Asian and Pacific Islander languages	1,318	1.62%
Other Languages	750	0.92%

Source: Extracted from the “Language Spoken at Home” data

For the purposes of this review, the “eligible population” is defined as the City’s population over the age of five years, which is 81,120 persons according to the 2018-2022 ACS estimates. This standard is applied to facilitate review and interpretation of the available U.S. Census and ACS data, and to provide the most conservative assessment of LEP needs.

The “Language Spoken at Home” table provides data for the four (4) major language classifications employed by the ACS. Two (2) of the four (4) major language classifications contain an eligible population exceeding the 1,000-person safe harbor threshold: Spanish (which also exceeds the 5 percent safe harbor threshold) and Asian and Pacific Islander languages.

Spanish

The 14,639 Spanish speaking persons who indicated they speak English less than “very well” constitutes 18.05 percent of the eligible population of 81,120 persons. This exceeds the 1,000-person and 5 percent thresholds established under HUD’s safe harbor guidance. Based on this determination, the translation of vital documents into Spanish is required.

Asian and Pacific Islander languages

Further review is required to determine the specific Asian and Pacific Islander languages which will require LEP translation services, if any. Additional data on the specific languages spoken in the City are unavailable using the 2018-2022 ACS estimates. The most recent data available for “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” in the City are from the 2011-2015 ACS 5-year estimates. According to this more detailed dataset, the “eligible population” (i.e. City’s population over the age of five years) is 80,440 persons. The table below shows the more specific data for the City:

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (Asian and Pacific Islander languages), City of Hawthorne			
Language	Estimate	Margin of Error	% of Eligible Population
Total Population 5 Years and Over:	80,440	±599	100.000%
Speak only English	33,421	±1,584	41.548%
Chinese:	484	±179	0.602%
Speak English "very well"	192	±105	0.239%
Speak English less than "very well"	292	±131	0.363%
Japanese:	231	±106	0.287%
Speak English "very well"	111	±77	0.138%
Speak English less than "very well"	120	±77	0.149%
Korean:	270	±110	0.336%
Speak English "very well"	68	±59	0.085%
Speak English less than "very well"	202	±88	0.251%
Mon-Khmer, Cambodian:	26	±37	0.032%
Speak English "very well"	26	±37	0.032%
Speak English less than "very well"	0	±28	0.000%
Hmong:	0	±28	0.000%
Speak English "very well"	0	±28	0.000%
Speak English less than "very well"	0	±28	0.000%
Thai:	104	±123	0.129%
Speak English "very well"	32	±47	0.040%
Speak English less than "very well"	72	±82	0.090%
Laotian:	0	±28	0.000%
Speak English "very well"	0	±28	0.000%

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (Asian and Pacific Islander languages), City of Hawthorne			
Language	Estimate	Margin of Error	% of Eligible Population
Speak English less than "very well"	0	±28	0.000%
Vietnamese:	763	±371	0.949%
Speak English "very well"	320	±201	0.398%
Speak English less than "very well"	443	±190	0.551%
Other Asian languages:	72	±56	0.090%
Speak English "very well"	39	±50	0.048%
Speak English less than "very well"	33	±33	0.041%
Tagalog:	1,885	±368	2.343%
Speak English "very well"	1,245	±317	1.548%
Speak English less than "very well"	640	±180	0.796%
Other Pacific Island languages:	311	±218	0.387%
Speak English "very well"	158	±127	0.196%
Speak English less than "very well"	153	±128	0.190%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (Table B16001)

Based on the 2011-2015 ACS data, shown in the tables above, no individual languages within the Asian and Pacific Islander languages classification meet the “safe harbor” criteria of containing 1,000 or more persons and/or five percent or more of the eligible population, who speak English less than “very well”. Therefore, the translation of vital documents into these languages is not required.

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

Each year, the City conducts a wide variety of programs utilizing HUD funding. While programs and their respective funding levels vary from year to year, the general activities have remained relatively consistent. As such, this LAP is designed to be effective for the five-year period between 2025-2026 and 2029-2030. If HUD-funded projects or programs are initiated that are not adequately considered under this LAP, an amendment to the Plan shall be performed to appropriately address the newly proposed activities.

The following table lists the City’s relevant program activities. For each program activity, the table lists the frequency with which LEP persons are likely to come into contact with the City and the methods through which LEP persons are most likely to interact with the City and receive/provide information:

Program Activity	Frequency	Level of Interaction
CDBG and HOME Administration	Annual	Attend public meetings and hearings. Call, email, and visit staff. Visit City website and social media channels. Read documents, brochures, posters, billboards, and flyers intended for public distribution.
CDBG Public Service Activities and Fair Housing Services	Daily	Call, email, and visit staff. Visit City website and social media channels. Read documents, brochures, posters, billboards, and flyers intended for public distribution. Complete program-related paperwork.
CDBG Capital Improvement Projects	Quarterly	Call, email, and visit staff. Visit City website and social media channels. Read documents, brochures, posters, billboards, and flyers intended for public distribution.
HOME Homeowner, Rental, and CHDO Activities	Daily	Call, email, and visit staff. Visit City website and social media channels. Read documents, brochures, posters, billboards, and flyers intended for public distribution. Complete program-related paperwork.

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

The City’s CDBG- and HOME-funded activities have the potential to positively impact the lives of all the City’s residents. The table below lists the direct benefits to participants for each program activity.

Program	Benefits
CDBG and HOME Administration	The CDBG and HOME Administration activities provide administrative oversight and, as such, include implementation of the citizen participation process for these federally funded activities. The citizen participation process is a key step in determining how these funds will be deployed annually.
CDBG Public Service Activities and Fair Housing Services	Public services such case management, behavioral health services, homelessness prevention, and youth services, among others, are made available to primarily benefit low- and moderate-income (LMI) residents whose incomes are at or below 80% of the Area Median Income (AMI). Fair housing services provide resolution of discriminatory acts to ensure equitable access to decent housing.

Program	Benefits
CDBG Capital Improvement Projects	Capital improvement projects, including public facilities and infrastructure improvements, make physical enhancements in LMI areas or to exclusively benefit LMI clientele.
HOME Homeowner, Rental, and CHDO Activities	Homeowner, rental, and CHDO activities, including building, buying, and/or rehabilitating affordable housing for rent or homeownership, or providing direct rental assistance to low-income people, create affordable housing for low-income households.

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

The City of Hawthorne 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. Employees who have passed their respective language proficiency examination and provide bilingual staff services are compensated for those services in the form of an employee benefit (i.e. bilingual pay).

The fair housing services provider also has bilingual (English/Spanish) staff available or interpreters accessible to assist clientele.

Based on the presence of bilingual staff, in addition to available interpretation (oral) services, translation (written) services are also available for any required documents, with the exception of legal documents and large-scale documents, which may require that external professional translators be employed.

Language Access Plan

Based on the Four-Factor Analysis, the greatest need for LEP resources is in the provision of language interpretation services and translated materials for Spanish speakers. To meet these needs, the City will implement the following measures:

Provide Interpretation and Translation Services

1. The City will continue to provide Spanish language interpretation services as necessary to ensure access by LEP persons in all federally funded activities. Interpreters will be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the LEP individual. City staff providing interpretation services will have passed their respective language proficiency examination.

2. While interpretation services are widely available at the various venues providing services, enhanced efforts are required in the provision of translation services for all documents deemed vital for each program offered.

“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.

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 following disclaimer: “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.”

3. Public participation surveys utilized during the Consolidated Plan and Annual Action Plan development processes will be provided in both English and Spanish; and Spanish interpretation services will be made available at all CDBG and HOME related public meetings.
4. Upon request, the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER), or summaries of these documents will be translated and made available in a manner accessible to Spanish speakers.
5. As necessary, support subrecipients in assessing their potential LEP translation needs and in developing an appropriate course of action based on the assessment.
6. Content on the City’s website can be translated by users into Spanish via Google Translate.
7. The City will create plans for handling verbal and written communication with LEP individuals in less frequently encountered languages. For example, the City will explore access to community based services which provide needed translation and interpretation services for non-Spanish speaking LEP persons.

Provide Notices to LEP Persons

8. With regard to the CDBG and HOME public participation process, the City will provide public hearing notices for its Consolidated Plan and Annual Action Plan in both English and Spanish. These notices will contain an advisory regarding the availability of language services throughout the planning process.
9. The City will insert “tag lines” in Spanish on all outreach materials indicating the availability of free translation and interpretation services by the City.
10. In an effort to enhance participation by LEP persons in the CDBG and HOME planning process and in CDBG and HOME-funded programs and activities, the City will conduct targeted outreach to LEP populations at public facilities in English and Spanish and via community contacts, ethnic media, or other available means.

Train Staff and Subrecipients on Plan

11. As necessary, the City will provide training for City staff and subrecipients on the requirements of this LAP and its effective implementation at the staff, program, and project level.

The training will utilize a curriculum that addresses the following: a description of internal resources available and how to access them, sensitivity to LEP person’s needs, response protocols for addressing LEP callers, written communications, in-person contacts, and availability and access to external referral resources.

Plan Monitoring and Update

This plan was originally prepared and approved during the 2025-2029 Consolidated Plan cycle. City staff shall review this plan as needed to ensure conformance with all statutory requirements, monitor changes in the language characteristics of its population, evaluate its effectiveness, and make modifications as necessary to accommodate changes to federally funded programs and projects.