

Language Access Plan



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California Department of Aging

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Introduction

As part of ensuring meaningful access to programs and services, the California Health and Human Services (CalHHS) Agency adopted a Language Access Policy on May 22, 2023, which requires each CalHHS department or office 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 on 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.

In accordance with the CalHHS policy, this document is the California Department of Aging's (CDA) Language Access Plan (LAP). In developing this Plan, CDA has reviewed its programs and services for the public, the ways it communicates with members of the public and the people served by the department, and how it currently provides information on its programs and services in languages other than English. According to a CDA data table (2023), it is projected that over 450,000 older Californians (aged 60 years and over) are non-English speaking.¹

CDA remains steadfast in its commitment to serving current and potential program participants who have LEP. This Plan covers CDA's existing systems and services as well as addressing those that will be implemented in the future utilizing its own resources and those available via other CalHHS partners.

Department Programs and Services

CDA's mission is to promote the independence and well-being of older adults, adults with disabilities, and their families through:

- Access to information and services to improve the quality of their lives;
- Opportunities for community involvement;
- Support for family members providing care;
- Protection of vulnerable older adults who reside in licensed facilities; and
- Collaboration with other state and local agencies.

The CDA oversees the programs and services listed in Table 1 to the public and its target service population of older adults, adults with disabilities, family caregivers and residents in long-term care facilities throughout the State. These services are primarily provided locally via the local Area Agencies on Aging (AAAs), Community Based Adult Services (CBAS), Multipurpose Senior Services Programs (MSSP), Aging and Disability Resource Connections (ADRCs), Caregiver Resource Centers (CRCs), Long-Term Care Ombudsman (LTCO), and Health Insurance Counseling & Advocacy Programs (HICAP) providers and other contracted agencies. The one exception is the program of the Office of Long-Term Care Patient Representative which is operated directly by CDA in partnership with two other local entities.

¹ 2023 California Department of Aging (CDA) Population Demographic Projections by County and PSA for Intrastate Funding Formula (IFF). Data source is the American Community Survey (2015-2019).

Table 1: CDA Programs

CDA Programs	Program Description
Food and Nutrition	Provided via the AAAs, nutrition providers serve healthy meals in a group setting at a congregate site or to an individual's home. In addition to providing meals, nutrition providers also offer nutrition education, nutrition risk screening, and nutrition counseling.
CalFresh Expansion (Seniors Eat Well)	Provided via the AAAs, CalFresh Expansion providers offer much needed monthly food assistance to California seniors.
CalFresh Healthy Living (Nutrition & Exercise)	Provided via the AAAs, CalFresh Healthy Living providers offer evidence-based nutrition and physical education activities for older adults aged 60 and older.
Health Promotion: Evidence-based Programs	Provided via the AAAs, Health Promotion program providers offer health-related training in the areas of fall prevention, support for caregivers, and managing chronic health conditions in a variety of settings.
Aging and Disability Resource Connection (ADRC)	ADRCs are operated and administered by AAAs and Independent Living Centers. Services offered include: person-centered options counseling, enhanced information and referral, short-term service coordination, and transition support to older adults and people with disabilities. Not all AAAs provide ADRC services at this time.
Home & Community Based Services (HCBS) Supportive Services	Provided via the AAAs, HCBS Supportive Services enables older adults to access resources that support healthy living and promote independence. Some of the services include but are not limited to, legal services, information and assistance, transportation, and care management.
Health Insurance Counseling and Advocacy Program (HICAP) – Medicare Counseling	Provided via the AAAs, HICAP providers offer free, confidential one-on-one counseling, education, and assistance to individuals and their families on Medicare, Long-Term Care insurance, other health insurance related issues and planning for long-term care needs.
Caregiver Resource Centers (CRCs)	CRCs offer counseling, legal assistance, education, and respite support by serving families and caregivers of those with Alzheimer's Disease, stroke, Parkinson's Disease, and other conditions.
Family Caregiver Services	Provided via the AAAs, Family Caregiver Services providers address the unique needs of family members who provide care to a relative. Available services may include respite care, training, counseling, and more. Some AAAs contract with CRCs to provide this service.
Senior Community Service Employment Program (SCSEP)	SCSEP is administered by AAAs and local community-based providers. SCSEP provides job training to low-income, unemployed adults aged 55 and over.

CDA Programs	Program Description
Community-Based Adult Services (CBAS)	CBAS is a Medi-Cal waiver program administered by local community providers. CBAS provides community-based health programs to older adults and adults with chronic medical, cognitive, or behavioral health conditions and/or other disabilities that place them at risk of needing institutional care.
Multipurpose Senior Services Program (MSSP)	MSSP is a Medi-Cal waiver program administered by local community providers. MSSP provides both social and health care management services to assist individuals to remain in their own homes and communities.
Long-Term Care Ombudsman (LTCO)	LTCO are offered via the AAAs either directly by the AAAs or via community providers. Long-Term Care Ombudsman assist residents in long-term care facilities regarding issues related to day-to-day care, health, safety, and personal preferences.
The Office of the Long-Term Care Patient Representative (OLTCPR)	OLTCPR is administered by CDA and local community providers. OLTCPR provides trained representatives for specific long-term care residents who may need medical treatment but lack the capacity to make health care decisions and have no legal surrogate authorized to make decisions on their behalf.

Language Access Requirements

In planning for how to provide meaningful language access moving forward, CDA reviewed the following Title VI four factors² 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.

CDA also considered the specific requirements in the CalHHS Language Access Policy; Title VI of the Civil Rights Act of 1964 [42 USC §2000(d)]; Code of Federal Regulations (CFR) §92.201 (b)(3); Affordable Care Act 1557 regulations (42 USC 18116); the California Government Code Section 11135, and the California Health and Safety Code Section 1418.8 (m) (1)-(3).

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

² In accordance with Title VI of the Civil Rights Act of 1964, the Four Factor Analysis provides a framework for assessing and ensuring meaningful access to programs and activities by LEP persons.

CDA is in alignment with CalHHS's top five threshold languages of Spanish, Chinese, Vietnamese, Korean, and Tagalog.

Providing Notice to People with LEP and Identifying Language Preference

CDA provides interpretation and translation language services at no charge to individuals with LEP through its contracted services with qualified and certified interpreters available to assist in multiple languages, including American Sign Language (ASL).

CDA notifies the public about available language assistance services that are free of charge using the following tools:

“I Speak” cards or posters will be placed at public reception desks. The availability of free language assistance services is available at public meetings and forum when requested in advance of the meeting. The listing of Equity@aging.ca.gov will be added to the CDA website as the primary contact point for the public to request free translation and interpretation services.

CDA's statewide toll-free California Aging and Adult Information Line (CAAIL) (1-800-510-2020) directs callers to their local AAAs by a caller speaking the name of their county or entering their zip code. Currently the CAAIL has three language options – English, Spanish, and Chinese (Mandarin). If the system does not recognize a caller's language, the call system will direct the caller to a CDA operator for assistance. The CDA operators have access to the department's language line so they can use the language line to help direct callers to their AAAs. CDA will evaluate this information line to further explore options for adding other languages to the call system. CDA is committed to improving its current measures to ensure that individuals who have LEP can fully access information about its programs and services. To gain further insight and feedback on its LAP and its accompanying reports, CDA will share information with and gather input/feedback from some of its existing consumer advisory committees, such as the Equity Advisory Committee on Aging and Disability, through other forums composed of individuals from diverse backgrounds, and via other communication venues with individuals who have LEP.

Language Services

Direct In-Language Communication

At present, there are no certified bilingual staff at CDA. This option may be further explored as a possible means to augment the contracted interpretation services currently available. Current and/or prospective CDA staff could be surveyed to identify those who may qualify to be formally tested for a bilingual certificate, in accordance with the CalHR Human Resources Manual (Section 1003).

In the interim, CDA staff can access telephone interpretation services as described in the section below.

Interpretation

To assist members of the public, consumers, and program participants who have LEP, CDA has a contractor to assist with telephone interpretation services via a 3-way call. These interpreter services will connect CDA staff with assistance from certified bilingual/multi-lingual interpreters covering a range of different languages, including ASL. These interpreters are well qualified and have been certified by professional entities such as the National Interpreting Certification program.

CDA has also contracted interpretation services that are available to assist staff in working with members of the public who have LEP or who need ASL interpretation for a meeting, webinar, or any other type of public event. To access these interpretation services that are offered in multiple languages, CDA staff currently contacts the Communications Office to place a request. CDA will be expanding its staff training to ensure greater awareness of the availability of these interpretation/translation services as well as how these interpretation services can be more effectively used.

Translation

The public can make requests for translations via Equity@aging.ca.gov. These translation services are available to the public at no cost.

Vital Documents

Table 2 below contains a list of the Vital Documents that were identified by CDA staff from its various programs. These vital documents represent a range of different types of forms or notices that are used for outreach promoting the availability of services and the enrollment process or when dealing with denials, appeals, complaints, and other related matters. CDA currently offers to translate these documents upon request at no charge and is working to translate all identified vital documents into the five threshold languages utilizing contracted translation vendors.

Essential Website Content

CDA will identify and post its “essential public website content,” which at a minimum will consist of information covering the basic elements of its various programs and services, about how to access its free translation and interpretation services, and addressing other pertinent information. CDA’s essential public website content will be translated into the five threshold languages and posted on its website to ensure that members of the public who have LEP are able to fully access critical information in their preferred language.

ASL Video Content

CDA will also add an ASL video clip describing the department and its programs along with the availability of free sign language interpretation services.

Written Communication

When CDA receives written communication in any language other than English, a staff member will work with its contractor to have the document translated by a certified translator. After composing the written response in English, the response will be translated by the translation service. And as needed, the staff member may also work with the translator to communicate via a three-way call to verbally address the concerns raised by the author of the written communication.

Training Staff

This section includes information on how CDA 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.

The topics of the more intensive training for public facing employees will include, at a minimum, CalHHS language access policy; background on the federal requirements of Title VI of the Civil Rights Act of 1964 and other pertinent federal/state laws or regulations; California demographics pertinent to the LEP population; how to identify an individual's language preference; processes and procedures for providing language assistance services; and how to work effectively with interpreters (in person, telephone, video, as applicable). Ongoing technical assistance will also be a critical part of this training program. Levels of training and follow-up will differ depending on how often staff are in contact with the public. Annual assessments and review will be conducted.

Initially the training may be conducted as a group session for all current CDA public-facing employees and then subsequently as individual training for new hires assigned to a public-facing position. The training will be coordinated by the CDA Human Resources Branch (HRB) in collaboration with the Office of Equity.

Non-Public Facing Employees

This section describes the process for training CDA employees who are not in public contact positions.

The training for non-public facing employees will be offered to all CDA staff and will be required of program leadership, employees involved in the development of public-facing documents or other materials or updating/maintaining department websites, and others whose work may indirectly impact the public. The training for non-public facing employees will also cover the CalHHS language access policy; background on the federal requirements of Title VI of the Civil Rights Act of 1964 and other pertinent federal/state laws or regulations; California demographics pertinent to the LEP population; different means for identifying an individual's language preference; the

processes and procedures at CDA for providing language assistance services; and ways to work effectively with interpreters (in person, telephone, video, as applicable). In addition, there may also be a focus on the types of translations and accompanying guidelines to help translators maintain consistency and accuracy throughout the translation process.

The training will be coordinated by CDA's HRB in collaboration with the Office of Equity. In addition, various training topics may be addressed during the standing monthly CDA Office Hours sessions. Other training formats may also be offered. The training will begin no later than December 1, 2024.

Monitoring and Updating LAP

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

CDA will create a monitoring program or process to ensure the implementation of details included in the LAP. This process will entail:

- Assessing employee awareness of the LAP;
- Assessing the effectiveness of the training of public-facing employees and non-public-facing employees;
- Assessing employee knowledge on how to access translation and interpretation assistance services;
- Identifying additional training needs;
- Identifying the amount and type of language services (interpreter services, translations) provided;
- Tracking cost of providing language access services;
- Assessing the effectiveness, timeliness, and quality of interpretation and translation services;
- Tracking new and updated translated Vital Documents;
- Monitoring complaints and resolutions;
- Soliciting and reviewing feedback on the language access services with community partners and stakeholders; and/or
- Analyzing and reviewing data pertinent to LEP needs and services.

Consistent with CalHHS Policy, the CDA LAP will be reviewed, revised if necessary, and resubmitted to CalHHS every two years. As part of the biennial review process, CalHHS will generate and update the list of minimum threshold languages for the translation of vital documents and essential web content. CDA's revisions will address any changes in its Title VI four-factor analysis; whether existing policies and procedures are adequately meeting the needs of LEP individuals; whether staff is sufficiently trained; and whether identified resources for assistance are up-to-date, available and accessible.

Reevaluations will incorporate, as appropriate, new programs, new legal requirements, new tools/technologies, 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 Equity@aging.ca.gov.

Table 2: Document List

The following is a list of **vital documents identified by CDA**. Included are the five threshold languages required by the CalHHS Language Access Policy. The public can contact equity@aging.ca.gov to request translations.

Program or Service Name	Form #	Form Name	Spanish	Chinese (traditional)	Chinese (simplified)	Tagalog	Vietnamese	Korean	Additional Languages
Office of the Long-Term Care Patient Representative		Notice of Interdisciplinary Team Review of Proposed Medical Intervention or Treatment	In Progress	In progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		Notice of Interdisciplinary Outcome	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		Notice of Interdisciplinary Team Review of Emergency Medical Intervention or Treatment	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
Office of the Long-Term Care Ombudsman	S101	LTC Ombudsman Witnessing of Advance Health Care Directive (AHCD)	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	S102	LTC Ombudsman Witness	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request

Program or Service Name	Form #	Form Name	Spanish	Chinese (traditional)	Chinese (simplified)	Tagalog	Vietnamese	Korean	Additional Languages
		Addendum to an AHCD							
	S104	LTC Ombudsman Witnessing of Property Transfer	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	S201	Consent to Access and Disclose Confidential Information	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	S202	Authorization to Release Information and Testify	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	S604	Discharge Notice Guidance	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	S900	Grievance About the LTC Ombudsman	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	SOC	341 NEED a Title for this document	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
Division of Home and Community Living – Older Adult Programs Branch		Caregiver Resource Center Information and Referral Intake Form	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request

Program or Service Name	Form #	Form Name	Spanish	Chinese (traditional)	Chinese (simplified)	Tagalog	Vietnamese	Korean	Additional Languages
		Enrollment Application Tool CDA SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		CSA Tool CDA SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	9120	Participant Form SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	9121	Community Service Assignment Form SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	9122	Unsubsidized Employment Form SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	9123	Exit Form SCSEP	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		SCSEP Data Validation Third-Party Attestation Omnibus Signature Form	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		SCSEP Data Validation Self-Attestation	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		Omnibus Signature Form	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
Division of Home and Community Living –		ADRC Consumer Experience Survey	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request

Program or Service Name	Form #	Form Name	Spanish	Chinese (traditional)	Chinese (simplified)	Tagalog	Vietnamese	Korean	Additional Languages
Person Centered Navigation Branch									
Division of Home and Community Living – Health at Home Branch	CDA 700	ADHC/CBAS Participation Agreement	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
		ADHC/CBAS Participant Rights	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	MSSP 13	Application for the Multipurpose Senior Services Program	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	16	MSSP Participant Rights	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	3	Notice of Action – Change in MSSP Services	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	2	Termination of MSSP Notice of Action	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	5	MSSP Request for State Hearing	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	4	State Hearing Notice – Your	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request

Program or Service Name	Form #	Form Name	Spanish	Chinese (traditional)	Chinese (simplified)	Tagalog	Vietnamese	Korean	Additional Languages
		Right to Appeal this Decision							
	7 & 8	MSSP Nondiscrimination Notice and Language Assistance Tag Lines	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	13	Application for MSSP Under Institutional Deeming Procedures	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request
	14	De-Institutional Services Request	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress	Upon Request