

Request for Input: Improving Language Access in Mortgage Lending and Servicing  
Federal Housing Finance Agency

To the Division of Housing Mission and Goals,

I am writing in regard to the work your agency has done to assess the public interface with its services and contingent bodies. As a researcher and a citizen I am grateful for the agency's commitment to enhance the experience and safety of individuals whose English skills are limited in different ways.

I am a linguistic and legal anthropologist in the Department of Anthropology at the University of California, Los Angeles. My expertise is in language access policy and practice, and though I specialize in litigants' access to language services in the courts, the findings of my research provide insight into potential improvements for a wide range of state and federal agencies.

I would like to take the opportunity for public comment on the progressive document entitled "Improving Language Access in Mortgage Lending and Servicing" to provide a language policy perspective on the area of *quality in language services*.

An important finding in my research is that there is a common need for better governing knowledge and accountability around what "counts" as quality in language services. Often, bilingual employees or language services employees' ability to speak a language is taken as the main or exclusive qualification, where there is additional need for these employees to be trained in the particular skills of translation, interpreting, or the professional knowledge associated with the services at hand.

As a result, it is my professional recommendation that where the FHFA will requests or require translations or hiring language services, the agency can consider including strong language indicating the need to use professional translation services. Further, the agency may also consider a contract for a referral service for language services that can ensure language services are qualified for the associated work.

Thank you for your consideration and the opportunity to provide public input. I am available for further comment on this or other related matters, and can be contacted at [sonyarao@ucla.edu](mailto:sonyarao@ucla.edu).

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