



**Texas General Land Office  
Community Development and Revitalization Program  
2018 South Texas Floods (Pub. L. 115-254 and 116-20)  
Language Access Plan for Limited English Proficient Persons**

The U.S. Department of Housing and Urban Development (HUD) has allocated Community Development Block Disaster Recovery (CDBG-DR) funds to the state of Texas. The Texas General Land Office (GLO) is administering the CDBG-DR funds for the state of Texas and will be responsible for the development of the 2018 South Texas Floods CDBG-DR Action Plan.

The GLO is responsible for ensuring that all citizens, including persons with disabilities and limited English proficiency (LEP), have equal access to information about the programs. The GLO will ensure that program information is available in the appropriate languages for the geographic areas to be served within the three counties that received a Presidential disaster declaration for flooding, DR-4377.

The GLO has evaluated the population of persons with limited English proficiency in the affected counties. The GLO consulted the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, published on January 22, 2007, in the Federal Register (72 FR 2732) at: [https://www.lep.gov/sites/lep/files/resources/HUD\\_guidance\\_Jan07.pdf](https://www.lep.gov/sites/lep/files/resources/HUD_guidance_Jan07.pdf)

Based on the four-factor analysis below, the GLO has concluded that it will translate vital documents into the following language: Spanish. The additional languages identified below (Table 3) will be accessible upon request.

Citizens with disabilities or those who need technical assistance can contact the GLO office for assistance, either via: TDD 512-463-5330 or TX Relay Service 7-1-1.

**Definition of a Limited English Proficient Individual:**

Limited English proficient (LEP) refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English.

This definition includes individuals with sensory impairments (SI), who are Deaf or hard of hearing and communicate using American Sign Language (ASL), have speech impairments, or that are blind or have visual impairments. LEP individuals may be entitled to language services or communication assistance for a service, benefit, or program that receives federal assistance.

**Four Factor Analysis**

The GLO is required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent.

The GLO conducted an individualized assessment that balances the following four factors:

**1. Number or proportion of LEP persons served or encountered in the eligible service population.** (“served or encountered” includes those persons who would be served or encountered by the recipient if the persons were afforded adequate education and outreach).

The GLO took the following steps to identify the number of LEP persons in the three counties under the State of Texas 2018 CDBG-DR Action Plan’s eligible counties.

- Downloaded Census Table **B16001** (table showing less than "very well" English proficiency) from the 2015 American Community Survey 5-year estimates (most recent available for all three Counties).
- Extracted three CDBG-DR Eligible Counties.
- Summed up totals for all languages and compared percentages for each language (speakers of “X” Language who speak English less than "very well").
- For languages with high totals, percentages were then broken down by county to see if any particular counties were showing figures above 5% or 1,000 LEP speakers

No LEP population, other than Spanish, exceeds 5 percent of the total population of the three counties or a single eligible county’s population. The GLO will translate the 2018 State of Texas 2018 South Texas Floods CDBG-DR Action Plan into Spanish only.

The total percent of the population across all three counties who are Spanish speakers who speak English less than "very well" is 27.44 percent, a total population of 356,960 people. All of the three eligible counties have populations with 5% or more of Spanish speakers who speak English less than "very well". The percentage of LEP Spanish speakers in each county are: Jim Wells (32.49%), Hidalgo (31.58%), and Cameron (28.79%). No other languages meet the threshold for translation.

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

The CDBG-DR programs address the long-term recovery needs of homeowners, renters, and communities impacted by the 2018 South Texas Floods.

Homeowners and renters are likely to have frequent contact with the program as they apply for and receive assistance. [Table 1]

**3. Nature and importance of the program, activity, or service provided by the program.**

The CDBG-DR programs provide funds for long-term recovery from the damage caused by the 2018 South Texas Floods. These programs are important to the impacted counties as the programs will repair/reconstruct damaged homes, develop affordable rental units, reimburse homeowners for repair to their damage homes, and repair infrastructure.

**4. Resources available to the recipient and costs to the recipient.**

The GLO is taking all reasonable steps to provide access for LEP persons for the CDBG-DR programs. The availability of resources, however, may limit the provision of language services in some instances. “Reasonable steps” may cease to be reasonable when the costs imposed substantially exceed the benefits.

**Table 1:** Potential Interaction with LEP Persons by Program

<b>Program</b>	<b>Applicants</b>	<b>Potential Interaction with LEP Persons</b>
<b>Homeowner Assistance Program</b>	Homeowners	Rehabilitate and reconstruct owner-occupied single-family homes damaged
<b>Homeowner Reimbursement Program</b>	Homeowners	Reimbursement for homeowners of repairs to a primary residence
<b>Affordable Rental Program</b>	Developers/Public Housing Authorities	Rehabilitation, reconstruction and new construction of multifamily units
<b>Local Infrastructure Competitions</b>	Units of Local Governments	None

**Language Assistance**

The GLO assistance to LEP persons may include, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff and subrecipients of the availability of LEP services; or
- Referrals to community liaisons proficient in the language of LEP persons.
- Posters notifying LEP individuals of the availability of interpretation services in Spanish will be available in the application in-take locations and on the GLO website, [recovery.texas.gov](http://recovery.texas.gov). (Other languages identified in Table 3 will be available upon request).
- Website Content—using the same prioritization as noted above, translated web content will be posted notifying LEP individuals of the availability of interpretation services

**Vital Documents**

- Vital documents may include the following written materials:
  - State Action Plans and amendments;
  - Notice of assistance availability;

- Applications for assistance for homeowner, and renters;
  - Consent and complaint forms;
  - Written notices of rights, denial, loss, or decreases in benefits or services;
  - Notices advising LEP persons of free language assistance; and
  - Notices of public hearings,
- Translation will be prioritized for those documents that are most needed to alleviate an immediate problem for an individual.
  - Posters in Spanish will be available in the application in-take locations notifying LEP individuals of the availability of translation assistance with documents (Posters in all other languages identified in Table 3 may be made available by request).
  - Website Content—using the same prioritization as noted above, translated web content and vital documents will be posted.

### **Language Service Protocols**

Translated web content and vital documents are available on the GLO’s website for web-based access to CDBG-DR programs, services and activities. Written Contact, in the form of email, letters, etc., and related responses are routed to either internal resources or external translation service provider(s) for translation, as needed.

Phone calls from persons of limited English proficiency may be transferred to internal staff or vendor(s) with the required language fluency.

The GLO contracts with vendors for telephone, document, and web content translation services and provision of in-person translations outside of the GLO staff’s capabilities on an as-needed basis.

### **Notice to the Public**

The GLO will post on its website the languages that are available for translation and interpretation services assistance.

### **Monitoring and Updating Language Access Plan**

The GLO will monitor and update the Language Access Plan, including seeking input from beneficiaries and the community on how it is working and what other actions should be taken, as needed.

The state is committed to providing access to the Action Plan, Action Plan Amendments and programs detailed within to all its citizens. These efforts include special consideration for those with limited English proficiency (LEP) and persons with disabilities. The Action Plan and

substantial amendments will be translated into Spanish to reach the LEP population in the impacted areas. Citizens with disabilities or those who need technical assistance can contact the GLO office for assistance, either via:

- Telephone for the hearing impaired 512-463-5330 or TX Relay Service 7-1-1;
- Email at [cdr@recovery.texas.gov](mailto:cdr@recovery.texas.gov); or
- Mail to the General Land Office, Community Development and Revitalization, Post Office Box 12873, Austin, Texas 78711-2873.

The GLO website, <http://recovery.texas.gov/>, will contain direct links to the Action Plan, amendments, reports, and recovery programs. It will be consistently updated to provide the latest available information.

**Table 2:** Total Persons with Visual or Hearing Impairments by County.<sup>1</sup>

County	Total Number of Persons with a:	
	Vision Impairment	Hearing Impairment
<b>Cameron</b>	13,954	16,124
<b>Hidalgo</b>	32,787	30,024
<b>Jim Wells</b>	1,594	2,264

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<sup>1</sup> U.S Census Bureau, American Fact Finder, 2017 5-year estimates, Table S1810, accessed March 25, 2020, <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

**Table 3: Total LEP Speakers by County<sup>2,3</sup>**

Language of LEP Speakers	Cameron	Hidalgo	Jim Wells
<b>Total Speakers per County</b>	<b>381,314</b>	<b>740,142</b>	<b>38,186</b>
<b>Spanish or Spanish Creole</b>	109,788	233,749	4,904
Arabic	158	21	-
Armenian	-	-	-
Chinese	144	189	-
French	16	342	-
French Creole	-	4	-
German	31	36	30
Greek	-	20	-
Gujarati	57	-	-
Italian	9	53	-
Japanese	-	303	-
Korean	55	452	17
Laotian	-	-	12
Mon-Khmer, Cambodian	-	20	-
Navajo	-	-	-
Other and unspecified languages	11	32	-
Other Asian languages	22	156	-
Other Indic languages	51	39	-
Other Indo-European languages	41	-	-
Other Native North American	11	-	-
Other Pacific Island languages	11	32	-
Other Slavic languages	5	-	-
Other West Germanic languages	-	-	-
Persian	12	-	-
Polish	21	19	-
Portuguese	35	13	-
Russian	40	35	-
Scandinavian languages	16	-	-
Serbo-Croatian	4	-	-
Tagalog	137	685	-
Thai	137	685	-
Urdu	44	19	-
Vietnamese	179	114	-
Yiddish	-	-	-
African languages	99	68	-

<sup>2</sup> U.S Census Bureau, American Fact Finder, 2015 5-year estimates, Table B16001, accessed March 25, 2020, <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

<sup>3</sup> 2015 5-year estimates were the most recent data available for all 3 counties as of March 25, 2020