



**Texas General Land Office
Community Development and Revitalization Program
Hurricane Harvey (Pub. L. 115-56 and 115-123)
Language Access Plan for Limited English Proficient Persons**

The U.S. Department of Housing and Urban Development (HUD) has allocated Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the state of Texas in response to Hurricane Harvey, DR-4332. The Texas General Land Office is administering the CDBG-DR funds for the state of Texas.

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 49 counties that received a Presidential disaster declaration for Hurricane Harvey, DR-4332.

The GLO has evaluated the population of persons with limited English proficiency in the 49 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) and at: https://www.lep.gov/guidance/HUD_guidance_Jan07.pdf. Based on the four-factor analysis below, the GLO has concluded that it will translate vital documents into the following five (5) languages: Spanish, Vietnamese, Chinese, Urdu, and Arabic. The additional fourteen (14) languages identified below 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) individuals are persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English.

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 LEP persons in the 49 counties impacted by Hurricane Harvey:

- 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 49 Counties).
- Extracted 49 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.

No LEP population other than Spanish exceeds 5% of the total population of the 49 counties in the impacted area or county's population.

The total percent of the population across all 49 counties that are Spanish speakers who speak English less than "very well" is 11.89%, a total population of 922,921 people. Thirty-two of the 49 counties have populations greater than 5% of Spanish speakers who speak English less than "very well".

The second highest total of LEP population is Vietnamese speakers who speak English less than "very well". The total percent of the population across all 49 counties that is Vietnamese speakers who speak English less than "very well" is 0.78%; a total population of 60,695 people. The counties with the highest percentage of population of Vietnamese speakers who speak English less than "very well" are Fort Bend (1.3%), Harris (1.13%), Jefferson (0.88%), and Aransas (0.82%). (None totaling more than 1,000 people.)

The third highest total of LEP population is Chinese speakers who speak English less than "very well". The total percent of the population across all 49 counties that is Chinese speakers who speak English less than "very well" is 0.47%; a total population of 36,853 people. The counties with the highest percentage of population of Chinese speakers who speak English less than "very well" are Fort Bend (1.79%), Calhoun (1.39%), and Harris (0.55%). (None totaling more than 1,000 people.)

The fourth highest total of LEP population is Urdu speakers who speak English less than "very well". The total percent of the population across all 49 counties that is Urdu speakers who speak English less than "very well" is 0.14%; a total population of 11,183 people. The counties with the highest percentage of population of Urdu speakers who speak English less than "very well" are Fort Bend (0.67%), Galveston (0.15%), and Harris (0.5%). (None totaling more than 1,000 people.)

The fifth highest total of LEP population is Arabic speakers who speak English less than "very well". The total percent of the population across all 49 counties that is Arabic speakers who speak English less than "very well" is 0.13%; a total population of 9,818 people. The counties with the highest percentage of population that is Arabic speakers who speak English less than

"very well" are Harris (0.25%), Fort Bend (0.18%), Chambers (0.14%). (None totaling more than 1,000 people.)

An additional fourteen languages totals of greater than 1,000 people who speak English less than "very well": French, French Creole, Italian, Portuguese, German, Russian, Persian, Gujarati, Hindi, Japanese, Korean, Cambodian, Thai, and Tagalog. to. [Table 2]

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, small businesses, and communities impacted by Hurricane Harvey.

Homeowners, renters, and small business owners 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 Hurricane Harvey. 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 provide assistance to small business owners.

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 Hurricane Harvey 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 LEPs by Program

Program	Applicants	Potential Interaction with LEP Persons
Homeowner Assistance Program	Homeowners	Rehabilitate and reconstruct owner-occupied single-family homes damaged
Local Buyout/Acquisition Program	Units of Local Governments/Homeowners	Buyouts/Acquisition of homes
Homeowner Reimbursement Program	Homeowners	Reimbursement for homeowners of repairs to a primary residence
Affordable Rental Program	Developers/Public Housing Authorities	Rehabilitation, reconstruction and new construction of multifamily units
PREPS Program	State Government	None
Local Infrastructure Program	Units of Local Governments	None
Economic Revitalization Program	Small Business Owners	Interim assistance to small business

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 the languages identified Table 2 will be available in the application in-take locations and on the GLO website, recovery.texas.gov.
- 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, renters, and small business owners;
 - 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,
- To identify vital documents for translation, a survey will be provided to the subrecipients for each program asking for feedback on which documents are most necessary for LEP persons. Translation will be prioritized for those documents that are most needed to alleviate an immediate problem for an individual.
- Posters in the languages identified Table 2 will be available in the application in-take locations notifying LEP individuals of the availability of translation assistance with documents.
- 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.

Staff Training

Staff will be trained to recognize and work with persons of limited English proficiency, and the use of appropriate language translation services. Internal staff will have access to a list of all staff members with fluency in languages other than English.

Staff training documents will also be changed in order to reflect a focus on training subrecipients and other grant administrators to recognize and work with persons of limited English proficiency.

Notice to 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.

Table 2: LEP persons total by County

County	Spanish	Vietnamese	Chinese	Urdu	Arabic	Tagalog	Hindi	Korean	French	Gujarati	Persian	Russian	Mon-Khmer, Cambodia	German	Japanese	Portuguese	Thai	Italian	French Creole
Aransas	1,027	189	-	-	39	-	-	-	16	-	-	-	-	-	-	-	-	-	-
Austin	1,898	-	-	-	-	-	-	-	11	-	-	-	-	9	-	-	-	-	-
Bastrop	6,593	25	129	-	-	12	-	-	203	-	76	-	-	59	-	17	20	-	-
Bee	1,975	6	-	-	-	-	-	-	-	-	-	-	-	-	3	7	-	-	-
Brazoria	19,141	1,714	574	31	43	754	55	137	107	146	-	35	154	111	112	36	41	-	13
Burleson	855	-	31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Caldwell	3,580	-	-	-	-	-	-	-	15	-	-	15	-	-	-	-	-	-	-
Calhoun	1,725	107	280	-	24	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chambers	2,922	84	-	-	49	62	-	-	-	-	-	130	-	-	-	65	20	-	-
Colorado	872	-	-	-	-	3	-	4	-	-	-	-	-	19	-	-	-	-	-
Comal	4,611	16	27	-	-	-	-	28	19	-	-	60	68	180	17	-	-	-	-
DeWitt	733	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	8	-
Fayette	993	28	-	-	-	-	-	-	-	-	9	-	-	26	-	-	-	-	-
Fort Bend	38,165	8,121	10,947	4,087	1,111	1,976	1,689	406	361	2,418	435	544	199	241	179	352	533	227	86
Galveston	14,660	948	680	439	171	368	86	86	106	-	2	147	45	45	71	51	24	96	4
Goliad	264	-	1	-	-	-	-	-	-	-	-	-	-	5	-	-	-	-	-
Gonzales	2,303	-	-	-	-	-	-	5	-	-	-	-	-	8	-	-	-	-	-
Grimes	1,910	8	-	-	-	-	-	-	-	-	-	-	-	-	17	-	6	-	-
Guadalupe	7,695	202	71	-	26	156	-	83	24	46	-	-	-	110	31	-	30	-	-
Hardin	520	64	73	-	-	16	32	-	-	-	-	-	-	19	-	-	-	-	-
Harris	681,373	45,290	22,241	5,845	8,006	4,307	4,310	4,540	3,576	2,153	3,589	1,744	1,778	852	1,582	1,444	895	671	903
Jackson	739	-	12	-	-	-	-	-	-	-	-	-	-	9	2	-	-	-	-
Jasper	666	23	-	-	-	-	-	40	9	-	-	-	12	-	-	-	-	-	-
Jefferson	15,891	2,065	174	462	58	203	220	62	268	42	23	-	36	39	4	17	-	-	60
Jim Wells	4,904	-	-	-	-	-	-	17	-	-	-	-	-	30	-	-	-	-	-
Karnes	1,148	-	-	-	-	-	-	-	-	-	-	-	-	5	11	-	-	-	-
Kleberg	3,597	-	93	-	9	13	-	-	-	-	-	-	-	-	-	-	2	-	-
Lavaca	825	11	17	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lee	1,057	8	33	-	-	-	-	-	-	-	-	-	-	69	-	-	-	-	-
Liberty	4,462	109	-	-	-	-	-	-	22	-	-	-	-	18	-	13	-	23	-
Madison	749	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Matagorda	4,054	267	-	-	-	16	45	-	17	-	-	-	12	10	-	-	-	-	4
Milam	887	32	2	-	-	-	-	25	-	-	-	-	-	-	-	-	11	-	4
Montgomery	34,566	399	866	186	144	219	57	211	127	80	53	85	95	147	78	91	19	130	13
Newton	54	18	33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nueces	29,223	508	324	100	114	421	-	249	46	54	67	25	-	164	43	-	49	12	-
Orange	800	150	46	-	2	46	15	-	75	-	-	-	25	8	16	-	-	-	-
Polk	2,176	9	6	-	8	11	-	4	-	-	-	10	-	-	-	-	-	-	-
Refugio	465	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sabine	82	-	-	-	-	-	-	-	11	-	-	-	-	-	-	-	-	-	-
San Augustin	110	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
San Jacinto	892	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
San Patricio	5,135	-	20	-	-	15	16	41	17	-	-	1	8	-	46	-	-	3	-
Tyler	287	-	-	-	-	-	4	12	6	-	-	-	-	-	-	-	5	-	-
Victoria	4,463	173	107	26	-	38	-	2	-	-	-	-	-	18	34	34	-	-	-
Walker	3,221	35	59	-	11	77	-	12	-	52	-	-	-	13	-	-	1	-	-
Waller	4,387	3	-	-	3	-	-	20	-	-	47	-	-	36	-	-	-	-	-
Washington	900	56	-	-	-	-	37	-	-	-	-	-	-	13	-	-	-	-	-
Wharton	3,366	4	7	-	-	-	-	-	-	-	-	-	-	5	-	-	-	8	-
Grand Total	922,921	60,695	36,853	11,183	9,818	8,713	6,566	5,984	5,036	4,991	4,301	2,796	2,432	2,268	2,246	2,127	1,657	1,178	1,087