ESG Learning Opportunity:
Language Access Plans and
Immigration Status

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Presenters
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ESG Learning Opportunity

Overview

❖ Focus on different ESG-related topics each month

❖ Occurs 1st Wednesday of each month at 10:00 am

❖ ESG Learning Opportunities recorded and posted online at http://www.tdhca.state.tx.us/home-division/esgp/video-library.htm

Webinar Objective

❖ Provide step by step process on how to create a language access plan, and examples of when to provide language access.
Improving Access to Persons with Limited English Proficiency (LEP)

❖ **Citations:**
  ➢ Executive Order 13166

❖ **Resources:**
  ➢ Limited English Proficiency (LEP) Frequently Asked Questions

Who are limited English proficient (LEP) persons?

❖ Persons who, as a result of national origin:
  ❖ do not speak English; and
  ❖ who have a limited ability to speak, read, write, or understand English.
What do Executive Order (EO) 13166 and the Guidance require?

- “EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons….”

Improving Access to Persons with Limited English Proficiency (LEP)

- Take reasonable steps to ensure meaningful access to ESG activities for persons with LEP
What are examples of language assistance?

- Oral interpretation services
- Bilingual staff
- Telephone service lines interpreter
- Written translation services
- Notices to staff and recipients of the availability of LEP services
- Referrals to community liaisons proficient in the language of LEP persons

Subrecipients’ Language Access Plan (LAP)

- Subrecipients that interact with clients must create and maintain a LAP
- LAP required to be kept on file for 2017 ESG
- LAP Guidelines
  - Spanish is a required language
  - Other languages may be identified by Applicant
  - Consider Spanish-speakers' access to activities
  - How language access will be addressed for each ESG activity proposed
  - Identifies voluntary or contracted services for assistance
LAP Sample


LAP Improvements

- TDHCA staff identified common issues on ESG applications regarding LAPs:
  - Lack of research showing population eligible for services
  - Lack of research showing persons with limited English proficiency, languages spoken
  - Need to describe the nature and importance of the program provided
  - Need to identify vital documents
Research population eligible for services

- There were 1,000 in poverty last year in Subrecipient XYZ’s community.
- There were 145 clients who requested assistance last year from Subrecipient XYZ.
- Subrecipient XYZ was unable to assist 35 clients because of lack of funding, so the total number of population requesting assistance is 180.
- Subrecipient XYZ has a waiting list of 10 clients for rapid re-housing.

Community Commons

- [http://www.communitycommons.org/](http://www.communitycommons.org/)
- Create a profile
Community Commons (2)

Enrich your community work with maps and data reports that can be shared and saved.

Make a Map
- Map Gallery
  Browse and open maps created by users of the Commons.
- Data
  Check out our data list or see what’s new.

Build a Report
- Community Health Needs Assessment
  Identify assets and potential disparities in your community related to community health and well-being.
- Vulnerable Populations Footprint
  Find areas in your community with low educational attainment and high poverty.
- Location Opportunity Footprint
  Find areas of opportunity in your community. Map housing and transportation costs, school proficiency and availability of jobs.

Community Commons (3)

Community Health Needs Assessment (CHNA)

Health Indicators Report

<table>
<thead>
<tr>
<th>County</th>
<th>Custom</th>
<th>Saved Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travis County, TX</td>
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<td>Winkler County, TX</td>
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<td>Wise County, TX</td>
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<tr>
<td>Hudspeth County, TX</td>
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How to Get Started:
1. Select the report area of interest. The report area can be defined by County and/or Custom area. You may select from existing geographies such as city or ZIP.
2. Click the “Save Report” button.
3. Check out the “Indicators Data List” to see what’s included in the report.
4. See our support page to learn more about how to create and customize a report.
Community Commons (4)

Data Category

Demographics • Social & Economic Factors • Physical Environment • Clinical Care • Health Behaviors • Health Outcomes

Demographics

Current population demographics and changes in demographic composition over time play a determining role in the types of health and social services needed by communities.

Data Indicators

- Total Population
- Change in Total Population
- Families with Children
- Female Population
- Male Population
- Median Age
- Population Under Age 18
- Population Age 0-4
- Population Age 5-17
- Population Age 18-24
- Population Age 25-34
- Population Age 35-44
- Population Age 45-54
- Population Age 55-64
- Population Age 65+
- Population with Any Disability
- Population in Limited English Households
- Population with Limited English Proficiency
- Population Geographic Mobility
- Foreign-Born Population
- Hispanic Population
- Urban and Rural Population
- Veteran Population

Community Commons (5)

Population with Limited English Proficiency by Language Spoken at Home (4-Category)

<table>
<thead>
<tr>
<th>Report Area</th>
<th>Spanish</th>
<th>Other Indo-European Languages</th>
<th>Asian and Pacific Island Languages</th>
<th>Other Languages Island Languages</th>
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<tbody>
<tr>
<td>Williamson County, TX</td>
<td>21,810</td>
<td>2,209</td>
<td>4,715</td>
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<tr>
<td>Texas</td>
<td>2,962,025</td>
<td>133,114</td>
<td>303,572</td>
<td>54,161</td>
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<tr>
<td>United States</td>
<td>16,365,893</td>
<td>3,442,377</td>
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<td>881,276</td>
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Indo-European Language Speaking Population by Language Spoken at Home, Part 1

<table>
<thead>
<tr>
<th>Report Area</th>
<th>French or French Creole</th>
<th>Italian</th>
<th>Portuguese</th>
<th>German</th>
<th>Yiddish</th>
<th>West Germanic Languages</th>
<th>Scandinavian Languages</th>
<th>Greek</th>
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<tbody>
<tr>
<td>Williamson County, TX</td>
<td>267</td>
<td>14</td>
<td>209</td>
<td>0</td>
<td>77</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Texas</td>
<td>15,481</td>
<td>2,738</td>
<td>5,381</td>
<td>467</td>
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<td>686</td>
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<tr>
<td>United States</td>
<td>592,482</td>
<td>177,024</td>
<td>251,896</td>
<td>105,577</td>
<td>57,092</td>
<td>76,541</td>
<td>12,442</td>
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Community Commons (6)

Info-European Language Speaking Population by Language Spoken at Home. Part 2

<table>
<thead>
<tr>
<th>Report Area</th>
<th>Russian</th>
<th>Polish</th>
<th>Serbo-Croatian</th>
<th>Other Slavic Languages</th>
<th>Armenian</th>
<th>Persian</th>
<th>Gujarati</th>
<th>Hindi</th>
<th>Urdu</th>
<th>Other Indic Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Williamson County, TX</td>
<td>55</td>
<td>122</td>
<td>37</td>
<td>31</td>
<td>170</td>
<td>407</td>
<td>516</td>
<td>258</td>
<td>432</td>
<td>114</td>
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<td>Texas</td>
<td>7,217</td>
<td>2,157</td>
<td>2,784</td>
<td>2,295</td>
<td>10,048</td>
<td>12,446</td>
<td>9,713</td>
<td>15,191</td>
<td>19,059</td>
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<td>United States</td>
<td>411,921</td>
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<td>96,852</td>
<td>121,444</td>
<td>157,885</td>
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<td>149,009</td>
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Asian and Pacific Island Language Speaking Population by Language Spoken at Home

<table>
<thead>
<tr>
<th>Report Area</th>
<th>Chinese</th>
<th>Japanese</th>
<th>Korean</th>
<th>Vietnamese</th>
<th>Hmong</th>
<th>Khmer / Cambodian</th>
<th>Thai</th>
<th>Tagalog</th>
<th>Lao</th>
<th>Other Pacific Island Languages</th>
<th>Other Languages</th>
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<tbody>
<tr>
<td>Williamson County, TX</td>
<td>1,368</td>
<td>168</td>
<td>772</td>
<td>1,208</td>
<td>31</td>
<td>37</td>
<td>106</td>
<td>221</td>
<td>57</td>
<td>160</td>
<td>587</td>
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<tr>
<td>Texas</td>
<td>75,070</td>
<td>6,772</td>
<td>29,947</td>
<td>117,367</td>
<td>299</td>
<td>5,386</td>
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<tr>
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</table>

Research languages spoken by LEP people

https://www.lep.gov/demog_data/demog_data.html
Research languages spoken by LEP people

Census Bureau Website:

Data example, Tarrant County, TX
Consider Factors 1 and 2

1. Number or proportion of LEP persons served or encountered in the eligible service populations
2. Frequency with which LEP persons come into contact with the program
   - Example: Subrecipient XYZ had 10 requests for assistance in Spanish.
   - Example: Staff report 20 interactions in street outreach programs with LEP persons speaking Vietnamese

Consider Factor 3

3. Nature and importance of the program, activity, or service provided by the program
   - Include all your programs, not just ESG.
Consider Factor 4

3. Resources available to the recipient and costs to the recipient

- Examples:
  - Subrecipient XYZ has two bilingual staff who speak Spanish and English.
  - Subrecipient XYZ has gathered bids for translation.
  - Subrecipient XYZ has a partnership with nonprofit ABC to provide language assistance.
  - Subrecipient has vital documents available in Spanish, other documents may be translated upon request.

May recipients rely upon family members or friends of the LEP person as interpreters?

- Generally do not rely on family members, friends of the LEP person, or other informal interpreters.
  - Exception: if LEP persons choose their own interpreter (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense.
Identify vital documents

- Any document that provides meaningful access to the program.
  - TDHCA has several documents in Spanish: Income certification, Income Screening Tool, Rental Assistance Agreement, Request for Unit Approval
  - [http://www.tdhca.state.tx.us/home-division/esgp/guidance-solutions.htm](http://www.tdhca.state.tx.us/home-division/esgp/guidance-solutions.htm)

Translate

- Translate or have a plan to translate documents.

Example: By June 2018, Subrecipient XYZ will have the intake application translated into Spanish by bilingual staff, and proofread by other bilingual staff. Until June 2018, LEP persons will be assisted through oral interpretation.
Determine how assistance will be provided

- Examples of providing assistance:
  - Multilingual signage shall be posted in public contact places asking LEP customers to identify the language they need.
  - The agency shall make use of bilingual personnel for initial interpretation services and may use telephonic interpretation services, contract interpreters, or community or professional services as may be necessary.

Language Identification Cards

[Image of Language Identification Cards]

Monitor and Update the LAP

- **Agency Name** will review and update, on a biennial basis or as needed, this LAP in order to ensure continued responsiveness to community needs and compliance with Executive Order 13166.
- **Agency Name** will periodically review actions toward increasing access for LEP persons in order to ensure continued steps toward wider language access.

Contact Information

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

221 E. 11th Street, Austin, TX 78701
P.O. Box 13941, Austin, TX 78711-3941
ESG: [http://www.tdhca.state.tx.us/home-division/esgp/index.htm](http://www.tdhca.state.tx.us/home-division/esgp/index.htm)
Program Assistance: [esg@tdhca.state.tx.us](mailto:esg@tdhca.state.tx.us)