



CDBG-DR Language Access Plan

Community Development Block Grant-Disaster Recovery
City of Philadelphia
June 9, 2023

Version History

Version	Date	Notes
1.0	6/9/2023	Publication of Version 1.0 of Language Access Plan for CDBG-DR

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SECTION 1. INTRODUCTION

The City of Philadelphia is the recipient of the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant - Disaster Recovery (CDBG-DR) funds allocated in response to presidentially declared disasters. The City has completed this Language Access Plan (LAP) in compliance with HUD's language access requirements (outlined in 72 FR 2732 1). The City will also adhere to all applicable local rules and regulations including [Philadelphia Home Rule Charter 8-600](#). The purpose of this LAP is to ensure that the City provides appropriate language assistance so that individuals with limited English proficiency (LEP) receive meaningful access to CDBG-DR programs. LEP persons include individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

The City and its partners are committed to complying with HUD's language access requirements and will update this LAP as new Census data becomes available.

By completing a LAP, the City describes the reasonable steps that the agency is taking to provide meaningful access for LEP persons to the City CDBG-DR funded activities, programs, and services. Completing a LAP and incorporating language assistance measures into the City operations achieves several goals:

- LEP persons receive the language access services they need to access CDBG-DR funded activities and programs.
- LEP persons receive outreach in their native languages and are informed about CDBG-DR programs and language assistance.
- The City continuously monitors and evaluates LAP implementation.

As described in HUD's 72 FR 2732, the LEP requirement is flexible and fact dependent, and the starting point is a community-level assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the City
2. The frequency with which LEP persons come in contact with the programs
3. The nature and importance of the program, activity, or service provided by the programs
4. The resources available to the City and the costs of LEP compliance

SECTION 2. FOUR-FACTOR ANALYSIS

The service area is defined as the Most Impacted and Distressed Area (MID). The entire City is identified as a MID therefore the service area includes the entire city.

The City completed a four-factor analysis for the entire city to determine the appropriate level of language access for each of its CDBG-DR programs and ensure meaningful access by LEP persons to critical services without imposing undue burdens on small business, small local governments, or small nonprofit entities. Some activities may be more important than others and/or have a greater impact on or contact with LEP persons, and thus may require more language assistance.

2.1 Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Key findings from 2021 American Community Survey (ACS) Census data pertaining to language spoken at home in Philadelphia are provided below:

- Nearly 24% of City residents (350,000 residents) speak a language other than English at home.
- Approximately 12% of all City residents (180,000 residents) speak another language at home and speak English “very well.”
- Approximately 11% of City residents (170,000 residents) speak another language at home and speak English less than “very well.”

Table 1 provides information about the distribution of LEP populations.

Table 1: Top 10 LEP Populations Across the City

Primary Language Spoken	Number who speak English less than “very well”	Percentage who speak English less than “very well”
Spanish:	76,550	5.2%
Chinese (incl. Mandarin, Cantonese):	24,527	1.7%
Vietnamese:	8,331	0.6%
Russian:	7,823	0.5%
Malayalam, Kannada, or other Dravidian languages:	6,359	0.4%
Portuguese:	5,783	0.4%
Haitian:	4,704	0.3%
Khmer:	4,426	0.3%
French (incl. Cajun):	4,178	0.3%
Arabic:	3,844	0.3%

HUD outlines “safe harbor” guidelines in 72 FR 2732, which are not requirements, but which grantees may follow to demonstrate compelling evidence of compliance with HUD’s LEP requirements (see Table 2 below).

Table 2: HUD’s LEP Safe Harbor Guidelines

Primary Language Spoken	Number who speak English less than “very well”
1,000+ of the eligible population in the service area, or among current beneficiaries	Translate vital documents
> 5% of the eligible population or beneficiaries, and 50+ in number	Translate vital documents
> 5% of the eligible population or beneficiaries, and 50 or less in number	Translate written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries, and less than 1,000 in number	No written translation is required

Only one LEP population analyzed in Factor 1 exceeds the 5% safe harbor threshold (Spanish). There are 22 languages (e.g., Spanish, Arabic, Russian) that exceed the 1,000-person safe harbor threshold. The City may not translate vital documents for these languages; however, individuals with disabilities requiring auxiliary aids or services, or persons who require translation services, may contact the LAP Coordinator. Further details on accessibility for LEP persons can be found in the Language Assistance Measures section.

2.2 Factor 2: The frequency with which LEP persons come in contact with the programs.

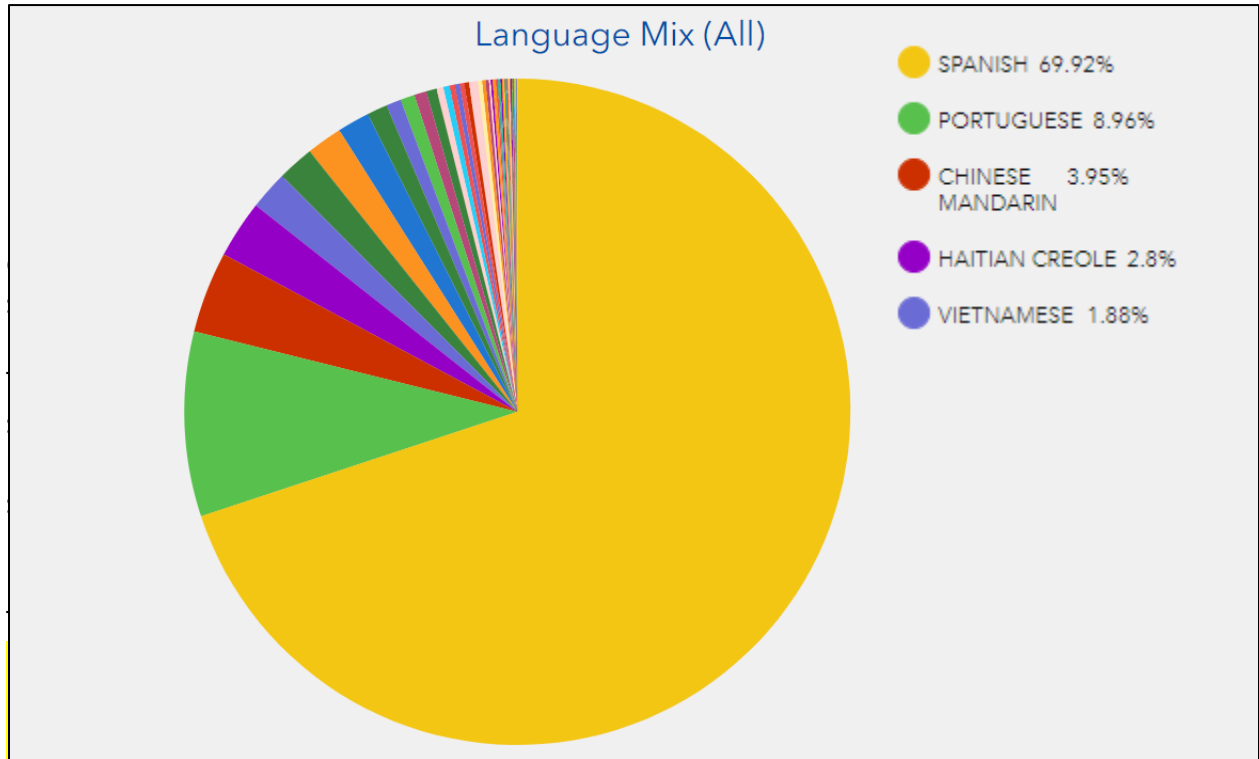
The City’s [Office of Immigrant Affairs](#) (OIA) manages [Language Access Philly](#), the City’s language access program that oversees language access policies and language services. Individuals who communicate in a language other than English have the right to receive vital information in their preferred language. Language Access Philly ensures that City departments have a plan in place to communicate with community members with a primary home language other than English (PHLOTE). By providing interpretation and translation, Language Access Philly helps improve communication between Philadelphians and City government.

OIA tracks language services used by residents when accessing City programs through their [Language Services Usage Dashboard](#). The dataset includes a detailed list of translation and interpretation transactions, including the department that initiated the request, the language requested by the city employee, the vendor providing language supports, and a brief description of the service provided.

According to 2022 data, the top five languages most requested include:

- Spanish

- Portuguese
- Chinese (Mandarin)
- Haitian Creole
- Vietnamese



The anticipated frequency of contact with LEP residents by program type are identified in Table 3. City subrecipients, who are directly implementing Housing Programs, have a greater probability of contact with LEP persons.

Table 3: Frequency of Contact With LEP Persons, by Program

CDBG-DR Program	Frequency of Contact with LEP Persons	Subrecipient's Frequency of Contract with LEP Persons
CDBG-DR Administration and Grant Documents	Low	Low
Housing Programs	High	High
Infrastructure and Public Facilities Programs	Low	Low
Economic Revitalization	Low	Low
Planning Program	Low	Low

2.3 Factor 3: The nature and importance of the program, activity or service provided by the programs

The City seeks to improve equitable participation in the City's CDBG-DR program. It is important that Philadelphia residents receive information pertaining to engagement in the language they feel most comfortable speaking. This includes reaching marginalized communities who are unable to participate in the city's civic opportunities due to a lack of language and/or disability access.

2.4 Factor 4: The resources available to the City and costs of LEP compliance

The City is taking all reasonable steps to ensure meaningful access for LEP persons to CDBG-DR programs and activities, including completing this four-factor analysis to better understand its jurisdiction's LEP needs. The following section outlines the reasonable steps that the City is taking to provide appropriate language assistance.

SECTION 3. LANGUAGE ASSISTANCE MEASURES

The City offers language assistance measures to ensure meaningful access by LEP persons to CDBG-DR programs, activities, and services. In all cases, the City seeks to provide high-quality, accurate, and professional language services to LEP persons. The following sections describe the City's language assistance measures categorized by high, medium, and low-level effort.

LAP COORDINATOR (MEDIUM EFFORT)

The City designated a LAP Coordinator to oversee LAP implementation and compliance across its CDBG-DR programs. The LAP Coordinator monitors to ensure the provision of meaningful language assistance services. If staff or the public have questions about language access services, they should contact the LAP Coordinator:

Patrick Clark
CDBG-DR Project Director
Recovery and Grants Office
1401 John F. Kennedy Blvd. Suite 1430
Philadelphia, PA 1910
Email: cdbg-dr@phila.gov
Phone: 215-686-2643

TRANSLATION OF VITAL DOCUMENTS (HIGH EFFORT)

A vital document is defined as a document that includes information regarding program eligibility requirements, applications, instructions, and appeals procedures, and/or summary documents. The City will translate the Executive Summary of the Action Plan into Spanish, Portuguese, Chinese (Simplified), Haitian Creole, and Vietnamese. These languages are identified by OIA as the top 5 languages most requested by residents when accessing City programs. See Factor 2 above for more information.

Should the City receive a request to translate a document into a language, the City will weigh the program costs and benefits to determine the appropriate measures. Subrecipients administering CDBG-DR programs will be responsible for translating vital documents as necessary.

WEBSITE (LOW EFFORT)

The CDBG-DR website at <https://www.phila.gov/departments/office-of-the-director-of-finance/hurricane-ida-recovery-funding/> includes resources to help LEP persons access key information about its CDBG-DR programs. The CDBG-DR website includes an auto-translation module through Google Translate to translate website content into more than 100 languages. Translation using the Google module includes coded website content only.

LEP OUTREACH (MEDIUM EFFORT)

The City conducts community outreach so that LEP populations know how to access CDBG-DR activities, programs, and services, such as:

- Working regularly with culturally specific organizations to provide information on any changes in programs or services.
- Encouraging culturally specific organizations' participation as subrecipients or contractors for outreach and intake.

See the City's CDBG-DR Citizen Participation Plan for more information on language access procedures related to public hearings and citizen participation periods.

SECTION 4. COMPLAINTS PROCESS

The City reviews all comments or complaints received by citizens via email, phone, mail, or in-person. Any written complaints concerning City compliance with this LAP will be referred to the City LAP Coordinator, and a written response will be provided within 15 working days upon receipt of the complaint. A copy of the written complaint and the response will be maintained by the City. Complaints concerning the general provision of language assistance may be submitted via email to cdbg-dr@phila.gov or by mail to Recovery and Grants Office 1401 John F. Kennedy Blvd. Suite 1430 Philadelphia, PA 1910.

Alternatively, complaints can be filed directly with the Fair Housing and Equal Opportunity (FHEO) Region 3 Office at the following address:

Philadelphia Regional Office of FHEO
U.S. Department of Housing and Urban Development
The Strawbridge Building
801 Market Street, 12th Floor
Philadelphia, Pennsylvania 19107

SECTION 5. EVALUATING AND UPDATING THE LAP

The LAP Coordinator will update this LAP as needed to reflect any change in the plan based on the prior year's demographic changes and to ensure relevancy and quality control of language access services. The City will review the procedures for providing language access services, outreach activities, and the language access data to periodically update the language access program. This LAP can be updated as the needs of the LEP population and the demands on City to service this population evolve. To inform future LAP updates, the LAP Coordinator will:

- Maintain data on the number of LEP persons who request language access services by the primary language spoken.
- Review updated Census data as it becomes available.
- Consider new resources, including funding, collaborations with other agencies, human resources, emerging technologies, and other mechanisms to improve language access.