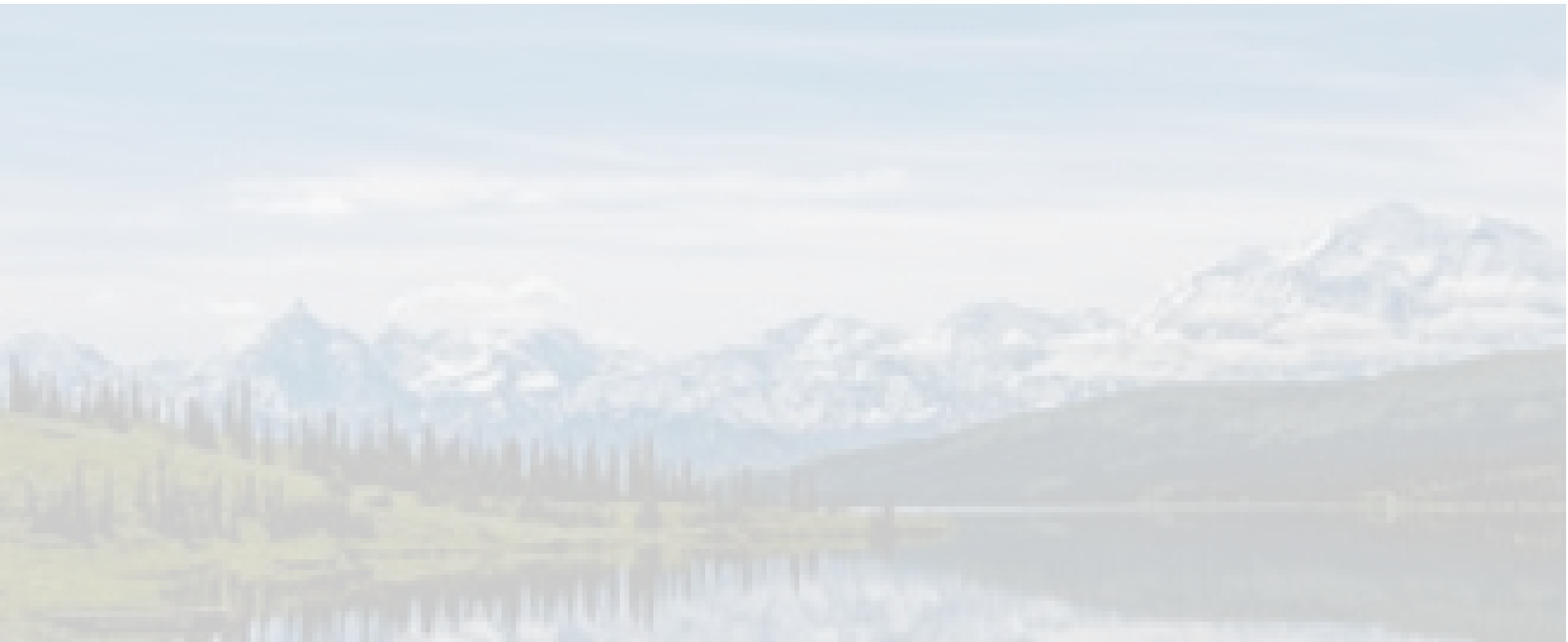




The State of Alaska CDBG-Disaster Recovery & CDBG-Mitigation Language Access Plan

**2018 Cook Inlet Earthquake
(Point MacKenzie Earthquake)**





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Version History

Version	Date	Summary Description
1.0	00/00/2022	Publication of Version 1.0 of THE STATE OF ALASKA CDBG-DISASTER RECOVERY & CDBG-MITIGATION LANGUAGE ACCESS PLAN



The State of Alaska CDBG-DR & CDBG-MIT Language Access Plan

Introduction

The State of Alaska Department of Commerce, Community and Economic Development (DCCED) completed this Language Access Plan (LAP) as a grantee to the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant–Disaster Recovery (CDBG-DR) and Community Development Block Grant–Mitigation (CDBG-MIT) funding in compliance with HUD's language access requirements (outlined in 72 FR 2731¹). The purpose of this LAP is to ensure that DCCED provides appropriate language assistance so that individuals with Limited English Proficiency (LEP) receive meaningful access to DCCED's CDBG-DR and CDBG-MIT programs. LEP individuals include persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

DCCED and its subrecipients 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, DCCED describes the reasonable steps the agency is taking to provide meaningful access for LEP individuals to DCCED's CDBG-DR and CDBG-MIT funded activities, programs, and services. Completing a LAP and incorporating language assistance measures into DCCED's operations achieves several goals:

1. LEP individuals receive the language access services they need to access CDBG-DR and CDBG-MIT funded activities and programs in the state.
2. LEP individuals receive outreach in their native languages and are informed about CDBG-DR and CDBG-MIT programs and language assistance.
3. DCCED staff receive ongoing training on the LAP and language assistance measures.
4. DCCED continuously monitors and evaluates LAP implementation.

Four-Factor Analysis

As described in HUD's 72 FR 2731 notice, the LEP requirement is flexible and fact-dependent, and the starting point is a community-level assessment that balances the following four factors:

1. Number or proportion of LEP persons eligible to be served or likely to be encountered by DCCED.
2. Frequency with which LEP individuals come in contact with the programs.
3. Nature and importance of the program, activity, or service provided by the programs to people's lives.
4. Resources available to DCCED and the costs of LEP compliance.

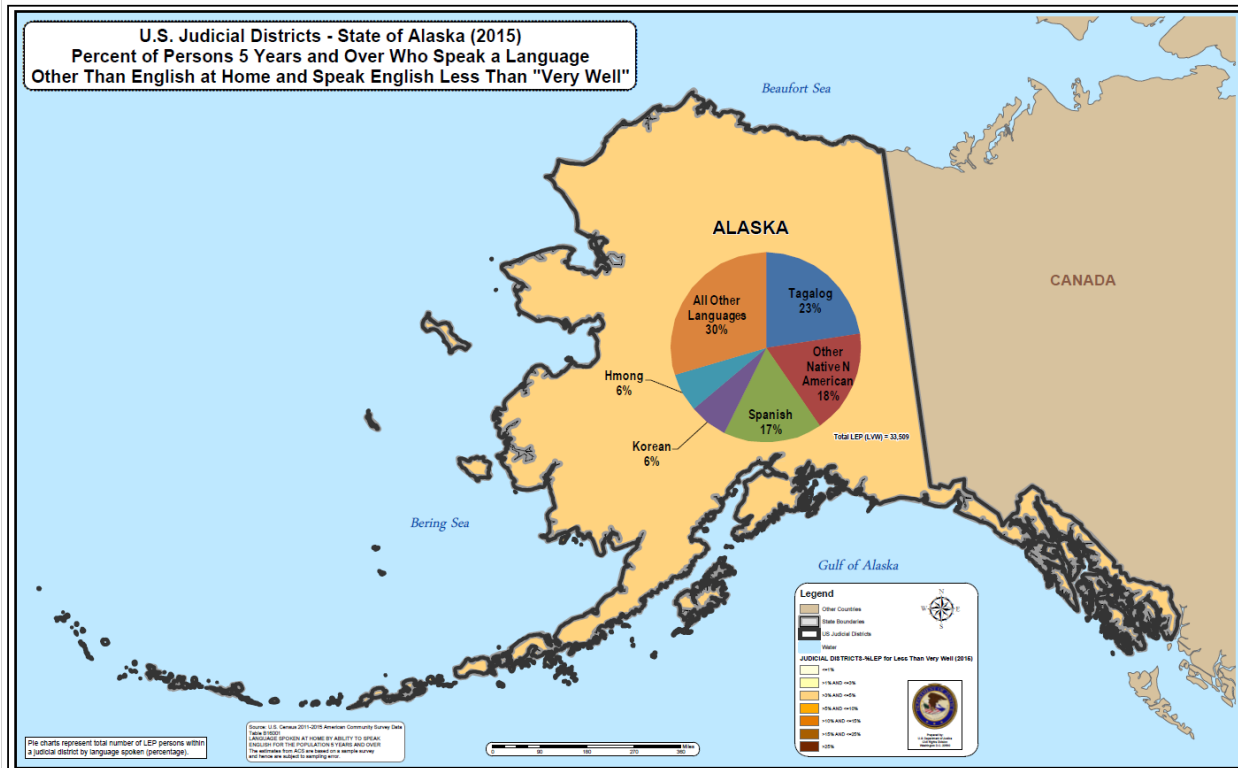
The State of Alaska CDBG-DR and CDBG-MIT service area includes the following three jurisdictions that were impacted by the Southcentral Alaska 2018 Cook Inlet Earthquake: the Municipality of Anchorage, the Kenai Peninsula Borough, and the Matanuska-Susitna Borough.

¹ United States Department of Housing and Urban Development. (January 22, 2007). *72 FR 2731 - Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*. <https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against>



As such, DCCED completed a four-factor analysis for three jurisdictions to determine the appropriate level of language access for each of its CDBG-DR and CDBG-MIT programs and ensure meaningful access by LEP individuals 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 greater impact on or contact with LEP persons, and thus may require more language assistance.

Factor 1: Number and Proportion of LEP Persons Eligible To Be Served or Encountered by the Programs



As shown in the above table, the State of Alaska has a diverse population with a vast array of spoken languages. DCCED analyzed data from both the Affirmatively Furthering Fair Housing (AFFH)² data as well as data from the American Community Survey (ACS).³ Whereas the AFFH data serves an important role in providing an overall examination of LEP⁴ populations (see Appendix 2 table), it only maps to the Municipality of Anchorage. Therefore, DCCED estimated the proportion of LEP persons in the service area using American Community Survey data,^{5,6} which maps to all three jurisdictions.

² United States Department of Housing and Urban Development. *Affirmatively Furthering Fair Housing (AFFH)*. Retrieved October 3, 2022, from https://www.hud.gov/program_offices/fair_housing_equal_opp/affh

³ United States Census Bureau. *American Community Survey Data Tables*. Retrieved October 3, 2022, from <https://www.census.gov/programs-surveys/acs/data/data-tables.html>

⁴ LEP persons are defined as those that "speak English less than very well" in both AFFH and ACS data.

⁵ United States. Census Bureau. (March 17, 2022). *American Community Survey 5-Year Data 2016-2020*. Retrieved from American Community Survey 2016-2020 5-Year Data Release (census.gov) <https://www.census.gov/data/developers/data-sets/acs-5year/2019.html>

⁶ United States. Census Bureau. *American Community Survey, B16001: Language Spoken At Home By Ability To Speak English For The Population 5 Years And Over*. Retrieved from <https://data.census.gov/cedsci/table?q=b16001&tid=ACSDT5Y2020.B16001>



Table 1 considers the State of Alaska’s LEP populations across the three jurisdictions’ service areas.

Table 1: Top 10 LEP Populations

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
Spanish or Spanish Creole	16,674	3.97%
Tagalog	9,131	2.18%
Other Native North American languages	5,524	1.32%
Other Pacific Island languages	4,650	1.11%
Hmong	3,529	.84%
Russian	3,463	.83%
Korean	3,226	.77%
German	1,872	.45%
French (incl. Patois, Cajun)	1,320	.31%
African languages	862	.21%

Table 2 below demonstrates the top three LEP populations of the service area, by jurisdiction.

Table 2: Top 3 LEP Populations, by Jurisdiction

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
Municipality of Anchorage		
Tagalog	4,178	1.51%
Spanish	3,493	1.26%
Hmong	2,143	.77%
The Kenai Peninsula Borough		
Tagalog	272	.51%
Other Native North American languages	233	.44%
Other Pacific Island languages	215	.40%
The Matanuska-Susitna Borough		
Russian	437	.49%
Other Slavic languages	429	.48%
Spanish or Spanish Creole	217	.24%



HUD outlines “safe harbor” guidelines in 72 FR 2732. The guidelines are not requirements, but grantees may follow them to demonstrate strong evidence of compliance with HUD’s LEP requirements (see Table 3 below).

Table 3: HUD’s LEP Safe Harbor Guidelines

Safe Harbor Threshold	Language Assistance Provided
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

Although none of the LEP populations analyzed in Factor 1 exceed the 5% safe harbor threshold, DCCED will translate vital documents⁷ into Spanish as strong evidence of compliance because the LEP Spanish population is relatively large. Eight languages (e.g., Tagalog,

Other Native North American, Other Pacific Island, Hmong, Russian, Korean, German, and French) exceed the 1,000-person safe harbor threshold, but are well below the 5% threshold; therefore, DCCED will not translate vital documents for these languages, but will provide “I Speak” cards and an On-Demand Remote Interpreting & Document Translation service to facilitate the request of services in all the languages listed above.

Factor 2: The Frequency With Which LEP Individuals Encounter the Programs

HUD’s LEP requirements give grantees flexibility to tailor language assistance by CDBG-DR and CDBG-MIT programs based on the frequency with which LEP individuals are likely to encounter each program. For example, programs that serve homeowners, renters, and small business owners may have more contact with LEP individuals and require more robust language access services than infrastructure programs.

Table 3 categorizes DCCED’s CDBG-DR and CDBG-MIT programs by the extent to which they directly interact with members of the public. DCCED provides meaningful language access across all programs, but DCCED will prioritize LEP training for public-facing staff that work on programs that provide direct client assistance and regularly interact with the public.

Table 4: Language Assistance by Program – CDBG-DR & CDBG-MIT

CDBG-DR & CDBG-MIT Programs	Direct Client Assistance?	Frequency of Public Contact
Forest Park Optional Relocation Assistance Program	No	None
Cook Inlet Housing Authority Affordable Housing Program	No	None
The Integration of the MOA Hazard Mitigation Plan & the MOA Comprehensive Land Use Plan	No	None

⁷ A “vital document” is defined as a document that includes information regarding program eligibility requirements, applications and instructions, program eligibility determinations, and appeals procedures.



Factor 3: Nature and Importance of the Activity or Service Provided by the Program

DCCED prioritizes language access services for programs, activities, and services with the greatest impact on LEP individuals. DCCED's LEP outreach focuses on CDBG-DR and CDBG-MIT funded activities that provide substantial direct benefits to participants, including homeowners and renters.

Factor 4: Resources Available to DCCED and Costs

DCCED is taking all reasonable steps to ensure meaningful access for LEP individuals to CDBG-DR and CDBG-MIT 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 DCCED is taking to provide appropriate language assistance.

Language Assistance Measures

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

LAP Coordinator (Medium Effort)

DCCED designated a LAP Coordinator to oversee LAP implementation and compliance across its CDBG-DR and CDBG-MIT programs. The LAP Coordinator ensures that DCCED staff understand their LAP responsibilities and provide ongoing training and monitoring to ensure the provision of meaningful language assistance services. DCCED's LAP Coordinator submits quarterly data on the level of language assistance requested, by native language. **If DCCED staff or the public have questions about language access services, they should contact the LAP Coordinator:**

Jason Whipple

DCCED/DCRA Publications Specialist
550 W. 7th Ave., Suite 1650, Anchorage, AK 99501
Email: DCCED.publications@alaska.gov

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. DCCED will professionally translate all vital documents into Spanish and post them on the DCCED CDBG-DR and CDBG-MIT websites. Should DCCED receive a request to translate a document into a language other than the languages listed above in Table 1, DCCED will weigh the program costs and benefits to determine the appropriate measures. Tables 5 below lists the vital documents for each CDBG-DR and CDBG-MIT program directly serving LEP individuals.



Table 5: Vital Documents by CDBG-DR & CDBG-MIT Programs

CDBG-DR & CDBG-MIT Program	Vital Documents
CDBG-DR & CDBG-MIT Grant Documents	Initial Public Action Plan and all amendments; Language Access Plan; Citizen Participation Plan; surveys; procurement guidance, training and/or technical assistance; procurement opportunities
Disaster Relief/Recovery-Neighborworks-Forest Park Optional Relocation Program	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Indian Housing Authority/Cook Inlet Housing Authority Affordable Housing	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Planning	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Municipality of Anchorage National Spatial Reference System (NSRS) Conversion	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Kenai Peninsula Borough Tsunami Hazard Siren System	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Matanuska-Susitna Borough Home Flood Mitigation Program	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications

Teletypewriter (TTY) Service (Low Effort)

Alaska Relay (<https://alaskarelay.com>) is a free public service that enables people with hearing or speech loss to place and receive phone calls using a teletypewriter (TTY).

Language Line Services (Medium Effort)

DCCED uses an On-Demand Remote Interpreting & Document Translation service to ensure that LEP individuals understand DCCED’s CDBG-DR and CDBG-MIT programs and services and can fully participate. As needed, DCCED can use this service to ensure that all individuals receive professional interpretation services.

Website (Low Effort)

DCCED’s CDBG-DR and CDBG-MIT websites *do not* include an auto-translation module through Google Translate. However, the Municipality of Anchorage Office of Emergency Management has an auto-translation module through Google Translate at <https://www.muni.org/Departments/OEM/Prepared/Pages/EmergencyPreparednessInfomationinManyLanguages.aspx>.

Anchorage is a diverse community with residents from around the world, and emergency preparedness is important for everyone. As a result, emergency preparedness flyers have been translated into Amharic, Arabic, Chinese, French, Hmong, Japanese, Korean, Lao, Nepali, Samoan, Somali, Spanish, Tagalog, Thai, Tongan, and Wolof.



Language Bank (Medium Effort)

DCCED has access to interpretation and translation services (<http://doa.alaska.gov/oppm/cam/docs/11-On-Demand-Interpreting-and-Translation-Services.pdf>) through contracts. There are three vendors on contract who maintain a “language bank” of staff who are fluent in a language other than English. DCCED recognizes that the language bank does not supplant the need for certified translation services; however, it enhances DCCED’s ability to provide interpretation services on demand by leveraging its multilingual staff.

“I Speak” Cards (Low Effort)

DCCED distributes the U.S. Census Bureau’s “I Speak” cards to all public-facing offices and trains staff to use them (see Appendix 4). These cards allow visitors to identify their native language so that DCCED can connect them to appropriate language access services.

LEP Outreach (Medium Effort)

DCCED, in conjunction with the three jurisdictions, conducts community outreach so that LEP populations know how to access CDBG-DR and CDBG-MIT activities, programs, and services. The outreach activities include the following:

- Working regularly with culturally specific organizations to provide information on any changes in programs or services.
- Encouraging culturally specific organizations’ participation as sub-recipients or contractors for outreach and intake.
- Participating in culturally specific organizations’ public events by providing staff and Spanish-language materials.

For example, DCCED works with Catholic Social Services (CSS⁸), whose programs help over 10,000 individuals annually regardless of their religious affiliation and/or faith. One program within CSS is Refugee Assistance and Immigration Services (RAIS⁹), which focuses on community integration while maintaining a respect for unique cultures. The RAIS website can be translated into 23 languages including Hmong, Urdu, and Pashto. The dedicated leadership and staff of RAIS stand ready to assist the Alaskan LEP population’s language access needs. For additional information, the public may contact the RAIS director:

Issa Spatrisano

Refugee Assistance and Immigration Services Director

3710 E. 20th Avenue

Anchorage, Alaska 99508

Email: ispatrisano@cssalaska.org

Phone: 907-222-7341

See DCCED’s Citizen Participation Plan for more information on language access procedures related to public hearings and citizen participation periods.

⁸ Catholic Social Services. (2022). *About Us*. Retrieved from <https://www.cssalaska.org>

⁹ Catholic Social Services. (2022). *Refugee Assistance & Immigration Services*. Retrieved from <https://www.cssalaska.org/our-programs/refugee-assistance-immigration-services/>



Complaints and Appeals

The Alaska State Ombudsman investigates citizen complaints about administrative acts of state agencies and determines remedies. Any written complaints concerning DCCED's compliance with this LAP will be referred to the DCCED 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 response will be maintained by DCCED.

Complaints concerning the general provision of language assistance may be submitted via email to dcra.admin@alaska.gov **or by mail** to the following address:

DCCED LAP Coordinator
550 W 7th AVE, STE 1535
Anchorage, AK 99501-3587

Alternatively, complaints can be filed directly with HUD's Office of Public Housing Region X Office via email at AK_Webmanager@hud.gov or by mail at the following address:

Seattle Regional Office of FHEO
U.S. Department of Housing and Urban Development
Seattle Federal Office Building
909 First Avenue, Room 205
Seattle, WA 98104-1000

Evaluating and Updating the LAP

The DCCED 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. DCCED will review procedures for providing language access services, existing training, outreach activities, and the language access data to periodically update the language access program. To inform future LAP updates, the LAP Coordinator will:

- Maintain data on the number of LEP individuals that request language access services by 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.



Appendix 1: Regulations and Resources

Applicable Regulations

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency
- 72 FR 22732, Federal Register Volume 72, Issue 13 (January 22, 2007), U.S. Department of Housing and Urban Development (HUD)

HUD's LEP Resources

- [HUD's website](#)

Additional Alaska Resources

- <https://dhss.alaska.gov/pages/languageaccess.aspx>



Appendix 2: Affirmatively Furthering Fair Housing (AFFH) Table AFFHT0006

NOTE: The AFFH data currently captures only the Anchorage, Alaska, Jurisdiction.

(Anchorage, AK CDBG) Jurisdiction Limited English Proficiency (LEP)	Language	#	%
#1 LEP Language	Spanish	13,895	5.02%
#2 LEP Language	Other Asian & Pacific Language	10,720	3.87%
#3 LEP Language	Tagalog	8,585	3.10%
#4 LEP Language	Other & Unspecified Language	5,400	1.95%
#5 LEP Language	Korean	3,025	1.09%
#6 LEP Language	Other Indo-European Language	1,825	0.66%
#7 LEP Language	Slavic Language	1,790	0.65%
#8 LEP Language	West Germanic Language	1,410	0.51%
#9 LEP Language	French	1,060	0.38%
#10 LEP Language	Chinese	790	0.29%



Appendix 3: American Community Survey (ACS) Table B16001

NOTE: The data below has been filtered to show only the LEP individuals who “speak English less than very well” according to the ACS data.

	Municipality of Anchorage		The Kenai Peninsula Borough		The Matanuska-Susitna Borough	
	#	%	#	%	#	%
Total Population:	276,810		53,561		89,193	
Spanish or Spanish Creole	13,894	5.02%	1,196	2.23%	1,584	1.78%
French (incl. Patois, Cajun)	943	0.34%	207	0.39%	170	0.19%
French Creole	116	0.04%	0	0.00%	0	0.00%
Italian	178	0.06%	8	0.01%	88	0.10%
Portuguese or Portuguese Creole	78	0.03%	6	0.01%	14	0.02%
German	1,254	0.45%	109	0.20%	509	0.57%
Yiddish	0	0.00%	0	0.00%	3	0.00%
Other West Germanic languages	158	0.06%	20	0.04%	17	0.02%
Scandinavian languages	346	0.12%	82	0.15%	20	0.02%
Greek	82	0.03%	27	0.05%	8	0.01%
Russian	1,121	0.40%	867	1.62%	1,475	1.65%
Polish	213	0.08%	3	0.01%	56	0.06%
Serbo-Croatian	38	0.01%	0	0.00%	0	0.00%
Other Slavic languages	418	0.15%	29	0.05%	480	0.54%
Armenian	0	0.00%	0	0.00%	0	0.00%
Persian	23	0.01%	0	0.00%	0	0.00%
Gujarati	125	0.05%	0	0.00%	0	0.00%
Hindi	62	0.02%	0	0.00%	0	0.00%
Urdu	12	0.00%	0	0.00%	7	0.01%
Other Indic languages	651	0.24%	0	0.00%	146	0.16%
Other Indo-European languages	270	0.10%	45	0.08%	127	0.14%
Chinese	788	0.28%	7	0.01%	187	0.21%
Japanese	736	0.27%	91	0.17%	164	0.18%
Korean	3,025	1.09%	21	0.04%	180	0.20%
Mon-Khmer, Cambodian	118	0.04%	7	0.01%	0	0.00%
Hmong	3,498	1.26%	0	0.00%	31	0.03%
Thai	748	0.27%	24	0.04%	40	0.04%
Laotian	773	0.28%	1	0.00%	14	0.02%
Vietnamese	479	0.17%	17	0.03%	55	0.06%
Other Asian languages	449	0.16%	42	0.08%	35	0.04%
Tagalog	8,586	3.10%	311	0.58%	234	0.26%



	Municipality of Anchorage		The Kenai Peninsula Borough		The Matanuska-Susitna Borough	
Other Pacific Island languages	4,400	1.59%	42	0.08%	208	0.23%
Navajo	108	0.04%	0	0.00%	0	0.00%
Other Native North American languages	3,757	1.36%	831	1.55%	936	1.05%
Hungarian	68	0.02%	3	0.01%	0	0.00%
Arabic	399	0.14%	8	0.01%	107	0.12%
Hebrew	90	0.03%	20	0.04%	34	0.04%
African languages	800	0.29%	11	0.02%	51	0.06%
Other and unspecified languages	178	0.06%	35	0.07%	9	0.01%



Appendix 4: “I Speak” Card

2004 Census Test	United States Census 2010 LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Խոսողո՞ւմ ե՞նք նշո՞ւմ կատարե՞ք այս քանակուսում, եթե խոսում կամ կարողո՞ւմ եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ឈ្មួញបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

DB-3309

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Economics and Statistics Administration
U.S. CENSUS BUREAU