



The State of Iowa

**STATE OF IOWA CITIZEN  
PARTICIPATION PLAN FOR  
CDBG-DR PROGRAMS  
(DR-4557)**

June 13, 2022



# CONTENTS

<b>Version History .....</b>	<b>ii</b>
<b>State of Iowa Citizen Participation Plan for CDBG-DR .....</b>	<b>1</b>
Purpose .....	1
Stakeholder Consultation During Plan Development .....	1
CDBG-DR Action Plans – Public Notice and Comment Periods .....	2
CDBG-DR Citizen Participation Waiver (87 FR 6364, 02-03-2022).....	2
<b>CDBG-DR Action Plan .....</b>	<b>3</b>
Website .....	3
CDBG-DR Public Hearings.....	3
Time Period for Comments.....	4
Consideration of Comments .....	4
Substantial Amendment .....	4
Citizen Participation Plan and Accessibility for CDBG-DR .....	4
Access to Records.....	5
Complaints .....	5
Use of Citizen Participation Plan.....	6
<b>Requirements for Local Government Receiving CDBG-DR Funds.....</b>	<b>6</b>
Citizen Participation for Local Governments .....	6
<b>APPENDIX A: CDBG-DR Language Access Plan Guidance Iowa Language Access Plan ...</b>	<b>9</b>
Introduction .....	9
Four Factor Analysis.....	9
Language Assistance Measures.....	15
Iowa Economic Development Authority Staff Training .....	17
Complaints and Appeals.....	17
Evaluating and Updating the LAP .....	17
ACS Data .....	19
I Speak Card .....	22
<b>APPENDIX B: Grantee Website Policies and Procedures for CDBG-DR.....</b>	<b>23</b>
Website Purpose .....	23
Website Process .....	23
Website Content.....	24
Quarterly CDBG-DR Website Update Checklist.....	24





## Version History

Version	Date	Summary Description
1.0	06/13/2022	Approval of CDBG-DR CPP





# State of Iowa Citizen Participation Plan for CDBG-DR

## Purpose

In consideration of the citizen participation requirements of 24 CFR Section 91.115, and according to the Secretary’s Waiver documented in Federal Register Notice published February 3, 2022, and subsequent relevant notices, the State of Iowa’s Economic Development Authority (IEDA), set forth the following requirements as it relates to the CDBG-DR Program funded by the Department of Housing and Urban Development (HUD). The Citizen Participation Plan (CPP) presents the State’s plan for providing and encouraging all citizens impacted by the 2020 Derecho Disaster (DR-4557), particularly low- and moderate-income citizens, to participate in the development of the State of Iowa’s Community Development Block Grant-Disaster Recovery (CDBG-DR) Action Plan. The overall purpose of the CPP is to provide for and encourage citizens to participate in an advisory role in the planning, implementing, and assessing of Iowa’s CDBG-DR funded programs.

HUD has identified the following areas as the most impacted and distressed (MID) area(s) due to the Derecho Disaster in August 2020. Additionally, the state has identified impacted and distressed areas designated as state MIDs.

### HUD Identified Most Impacted and Distressed (MID) Areas from 2020 Disaster (DR-4557)

<b>HUD MID Counties</b>	Linn
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### Remaining Counties Adversely Affected and Eligible for CDBG-DR under DR-4557

<b>State Grantee MID Counties</b>	Marshall, Benton, and Tama
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## Stakeholder Consultation During Plan Development

To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, IEDA will consult with the following stakeholders:

- Indian tribes
- Local governments
- Federal partners
- Nongovernmental organizations
- Private sector
- Other affected parties in the surrounding geographic area
- Organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities impacted by the disaster
- Relevant government agencies including the state and local emergency management agencies that have primary responsibility for the administration of FEMA funds



## **CDBG-DR Action Plans – Public Notice and Comment Periods**

The State of Iowa received HUD CDBG-DR funds allocated in response to the federally declared Derecho disaster in August 2020. Citizen participation requirements for the CDBG-DR Action Plan are in the Federal Register Notice issued 2/3/2022 (87 FR 6364). The Federal Register Notice waives regular citizen participation requirements and states requirements for notifying the public regarding the use of the disaster CDBG-DR funds and provides an alternative streamlined process.

### **CDBG-DR Citizen Participation Waiver (87 FR 6364, 02-03-2022)**

To permit a more streamlined process and ensure disaster recovery grants are awarded promptly, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements require the grantee to include public hearings on the proposed action plan and provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds. The streamlined citizen participation requirements for a grant under this notice are:

- Publication of the Action Plan with opportunity for public comment, and substantial amendment criteria. Before the grantee adopts the action plan for this grant or any substantial amendment to the action plan, the IEDA will publish the proposed plan or amendment to its CDBG-DR website.
- The manner of publication must include prominent posting on IEDA's official CDBG-DR website and must afford citizens, affected agencies, and other interested parties a reasonable opportunity to examine the plan or amendment's contents and provide comment.
- The topic of disaster recovery should be navigable by citizens from the IEDA's homepage.
- Additionally, IEDA may notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations.
- The published Action Plan will meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.



## CDBG-DR Action Plan

IEDA will post the draft CDBG-DR Action Plan or any substantial amendment for at least 30 days of public comment on the CDBG-DR website <https://www.iowaeda.com/disaster-recovery/cdbg-derecho/>. Additionally, IEDA will convene at least one public hearing on the draft CDBG-DR Action Plan after being posted on its website for public comment and prior to submission to HUD. Notice of all hearings will be posted a *minimum of 10 business days* prior to public hearings.

The State of Iowa makes every effort to publish the draft CDBG-DR Action Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain available on the IEDA website throughout the comment period.

To notify the public of the plan's availability, public notification is provided via publication in local ads of the local newspaper, through promotion by applicable partners (i.e., council of governments), and social media. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments. IEDA will also provide a copy of the plans to interested parties upon request.

- The grantee will make the plan available for a **minimum 30-day comment period**.

The grantee considers any comments or views of citizens and units of general local government received in writing or orally in preparing the final CDBG-DR Action Plan. IEDA will address the substance of any comments rather than only acknowledging receipt. A summary of these comments and the grantee's response, including those not accepted and reasons, will be attached to the final posted CDBG-DR Action Plan and uploaded in DRGR.

### Website

To notify the public of the CDBG-DR Action Plan's availability, IEDA will post the CDBG-DR Action Plan and Substantial Amendments to the Action Plan on the CDBG-DR website <https://www.iowaeda.com/disaster-recovery/cdbg-derecho/>, which is linked to the grantee's main website <https://www.iowaeda.com/disaster-recovery/>. To ensure the public knows how all funds are used and administered, the grantee will also post all performance reports, the CPP, procurement policies, contracts that will be paid with CDBG-DR funds, and a description of goods or services currently being procured on the CDBG-DR website. For further information regarding the website content see Appendix B – Website Policy and Procedure.

### CDBG-DR Public Hearings

Per the Federal Register Notice's approach for CDBG-DR, at least one public hearing is required during the 30-day comment period. The process below will be followed for a public hearing regarding the use of the CDBG-DR funds or a Substantial Amendment to the Action Plan.





All public hearings (whether in-person or virtual) will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP). Both in-person and webinar-hosted hearings will be promoted through publication in local ads, through promotion by applicable partners (i.e., a council of governments), and on social media for at least 10 business days prior to the hearing.

### **Time Period for Comments**

IEDA provides at least 30-days for public comment from citizens and units of local government on the CDBG-DR Action Plan.

The CDBG-DR Action Plan will be available on the IEDA CDBG-DR website <https://www.iowaeda.com/disaster-recovery/cdbg-derecho/> and the grantee's main website <https://www.iowaeda.com/disaster-recovery/>.

### **Consideration of Comments**

The grantee considers any comments or views of citizens and units of local government received either in writing or orally when preparing the final CDBG-DR Action Plan. The grantee will address the substance of any comments rather than acknowledging receipt. A summary of those comments and the grantee's response will be attached to the final Action Plan or Substantial Amendment to the Action Plan and uploaded in DRGR.

### **Substantial Amendment**

Substantial amendments to the CDBG-DR Action Plan will require at least 30-days of public notice. The public notice will be made in the same manner as prescribed in this document. The thresholds for a Substantial Amendment to the Action Plan are as follows:

Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed change to an adopted method of distribution
- The allocation or reallocation is more than five million dollars or greater of a program budget

### **Citizen Participation Plan and Accessibility for CDBG-DR**

To ensure Limited English Proficiency (LEP) individuals and persons with disabilities have prior notice and access to the public hearings, IEDA will take the following actions:

- Announce public hearings to organizations that represent minorities and persons with disabilities at least 10 business days prior to the public hearing date(s).
- Include a statement in public hearing notices indicating that participants may request language interpretation to assist in their participation, via email or phone.



- Include a statement in notices of public hearings that the location of the meetings is accessible to a person with physical disabilities.
- Include a statement in public hearing notices that attendees can request reasonable accommodations from the grantee to participate in the public meetings.
- The grantee will make a reasonable effort to translate significant documents and include a “Google Translate” on the grantee’s website to accommodate LEP communities.

Residents who require special accommodations to attend the hearing should contact the grantee by emailing [Disaster@lowaEDA.com](mailto:Disaster@lowaEDA.com) to make advance arrangements. For hearings that are held in areas that meet the minimum threshold for LEP accommodations, translations will be provided.

IEDA provides guidance to its units of local government on developing a local language access plan (LAP). This guidance is provided as Attachment A of this document. Provisions for interpretation shall be made for LEP residents to encourage and ensure meaningful access to participation in public hearings, communication materials, websites, and public comments.

## Access to Records

Citizens, public agencies, and other interested parties are given reasonable and timely access to the information and records relating to the IEDA’s CDBG-DR Action Plan and IEDA’s use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

## Complaints

To comply with the requirements regarding complaints, the IEDA has designated an appropriate and practicable procedure to handle complaints from citizens related to the CDBG-DR Action Plan, Substantial Amendments to the Action Plan, and performance reports. Upon receiving a complaint, the IEDA will provide a timely, substantive written response within a 15 working day period.

### Complaints should be sent in writing to:

**Steven Stransky**, Disaster Recovery Team Lead  
Iowa Economic Development Authority  
1963 Bell Avenue, Suite 200  
Des Moines, IA 50315  
[Steven.Stransky@lowaEDA.com](mailto:Steven.Stransky@lowaEDA.com) or [Disaster@lowaEDA.com](mailto:Disaster@lowaEDA.com)  
515.348.6204

**Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1–800–347–3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).**

Complaints regarding accessibility can be reported to the IEDA’s 504 Coordinator. Action Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and







other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

**Grantee 504 Coordinator:**

**Joyce Brown**, Housing Project Manager  
Iowa Economic Development Authority  
1963 Bell Avenue, Suite 200  
Des Moines, IA 50315  
Joyce.Brown@IowaEDA.com  
515.348.6209

**Use of Citizen Participation Plan**

IEDA will follow the citizen participation plan in full and to the best ability possible, as described above.

**Requirements for Local Government Receiving CDBG-DR Funds**

**Citizen Participation for Local Governments**

Recipients of CDBG-DR funds must comply with the State Citizen Participation Plan for CDBG-DR requirements as found in 87 FR 6364, published 2/3/22. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program openly with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the recipient's CDBG-DR project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them. Citizens shall be provided adequate and timely information to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance

The Citizen Participation Plan includes citizen participation requirements for local governments receiving CDBG-DR funding that will ensure that citizens are provided with reasonable advance notice of, and the opportunity to comment on, proposed CDBG-DR applications to the State. Local governments shall hold a minimum of two public hearings, including one hearing prior to submission of CDBG-DR applications to the state, which must respond to the disaster impacts and hazard risks identified in the CDBG-DR Action Plan. A second hearing is required to review program performance. To comply with the Citizen Participation requirements of 24 CFR 570.486





and Section 507 and 508 of the Housing and Community Development Act of 1987, CDBG-DR applicants are required to do the following:

1. Conduct at least one public hearing on the activities proposed in the application. The hearing must include a review of the following:
  - a. how the need for the activities was identified;
  - b. how the proposed activities will be funded and the sources of funds;
  - c. date the CDBG-DR application will be submitted;
  - d. requested amount of federal funds;
  - e. estimated portion of federal funds that will benefit low- and moderate-income persons;
  - f. where the proposed activities will be conducted;
  - g. plans to minimize displacement of persons and businesses resulting from funded activities;
  - h. plans to assist persons displaced; and
  - i. the nature of the proposed activities.
2. Conduct at least one public hearing on the status of funded activities. The hearing must include a review of the following:
  - a. general description of accomplishments to date;
  - b. summary of expenditures to date;
  - c. general description of the remaining work; and
  - d. general description of changes made to the project budget, performance targets, activity schedules, scope, location, objectives, or beneficiaries.
3. Publish hearing notices in a manner consistent with requirements of the Iowa Code, Section 362.3, and submit a copy of the public notice and minutes with the application.
4. Ensure the public's reasonable access to all local meetings, project records and information relating to the proposed and actual use of federal funds.
5. Conduct all related public meetings or hearings in public buildings or facilities that are accessible to persons with disabilities.
6. Provide citizens with names and addresses of the following:
  - a. the person(s) authorized to receive and respond to citizen proposals, questions and complaints concerning;
  - b. the person(s) available and able to provide technical assistance to groups representative of low- and moderate-income persons in preparing and presenting their proposals for the request and use of federal funds.
7. Provide translators during or written translations after public hearings attended by non-English speaking residents upon their request whenever they represent a significant proportion of the persons benefited by proposed or actual activities. A determination of what constitutes "...a significant proportion of the persons benefited by proposed or





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actual activities” shall be at the sole discretion of the IEDA Disaster Recovery Team Lead.



# APPENDIX A: CDBG-DR Language Access Plan Guidance Iowa Language Access Plan

## Introduction

The Iowa Economic Development Authority (IEDA) completed this Language Access Plan (LAP) as a grantee to the Department of Housing and Urban Development's (HUD) Community and Disaster Block Grant–Disaster Recovery (CDBG-DR) funding in compliance with HUD's language access requirements (outlined in 72 FR 2732). The purpose of this LAP is to ensure that IEDA provides appropriate language assistance so that individuals with Limited English Proficiency (LEP) receive meaningful access to IEDA's CDBG-DR 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.

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

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

## Four Factor Analysis

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:

5. Number or proportion of LEP persons eligible to be served or likely to be encountered by IEDA
6. The frequency with which LEP individuals encounter the programs
7. Nature and importance of the program, activity, or service provided by the programs to people's lives
8. Resources available to IEDA and the costs of LEP compliance

Iowa Economic Development Authority's CDBG-DR service area includes the following four (4) counties that were impacted by the 2020 Derecho: Benton, Linn, Marshall, Tama.



As such, IEDA completed a four-factor analysis for the four counties to determine the appropriate level of language access for each of its CDBG-DR programs and ensure meaningful access by LEP individuals to critical services without imposing undue burdens on small businesses, 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.

**Factor 1: Number and proportion of LEP persons eligible to be served or encountered by the programs**

IEDA estimated the proportion of LEP persons in the service area using 2011-2015 American Community Survey (ACS) data (*Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*). LEP persons are defined as those that “speak English less than very well” in the ACS data.

**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	130,407	37.10%
Other Slavic Languages	13,237	48.50%
German	12,761	30.10%
Chinese (including Mandarin, Cantonese)	12,515	44.30%
Arabic	9,791	38.80%
Vietnamese	9,781	67.70%
French (Including Cajun)	9,157	59.40%
Swahili or Other Languages of Central, Eastern, and Southern Africa	9,151	52.70%
Yiddish, Pennsylvania Dutch, or Other West Germanic Languages	5,896	11.30%
Thai, Lao, or Other Tai-Kadai Languages	4,631	52.80%



Table 2 below demonstrates the top 3 LEP populations of the service area, by county.

**Table 2: Top 3 LEP populations, by county**

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
<b>Benton</b>		
Spanish	71	0.30%
Other Indo-European languages:	27	0.11%
French, Haitian, or Cajun:	25	0.10%
<b>Boone</b>		
Spanish	173	0.69%
Other Asian and Pacific Island languages:	1	0.00%
None	N/A	N/A
<b>Cedar</b>		
Spanish	77	0.44%
Other and unspecified languages:	21	0.12%
None	N/A	N/A
<b>Clinton</b>		
Spanish	197	0.45%
Chinese (incl. Mandarin, Cantonese):	56	0.13%
Russian, Polish, or other Slavic languages:	30	0.07%
<b>Dallas</b>		
Spanish	1,660	1.99%
Other Indo-European languages:	553	0.66%
Russian, Polish, or other Slavic languages:	271	0.32%
<b>Greene</b>		
Spanish	128	1.52%
Tagalog (incl. Filipino):	21	0.25%
Other Asian and Pacific Island languages:	4	0.05%
<b>Grundy</b>		
Spanish	63	0.54%
Chinese (incl. Mandarin, Cantonese):	15	0.13%
German or other West Germanic languages:	7	0.06%
<b>Guthrie</b>		
Spanish	96	0.95%
Other Asian and Pacific Island languages:	20	0.20%
None	N/A	N/A



Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
<b>Hardin</b>		
Spanish	236	1.46%
Other Indo-European languages:	20	0.12%
Arabic:	14	0.09%
<b>Iowa</b>		
Spanish	66	0.43%
German or other West Germanic languages:	32	0.21%
Russian, Polish, or other Slavic languages:	11	0.07%
<b>Jackson</b>		
Spanish	35	0.19%
Other Asian and Pacific Island languages:	20	0.11%
German or other West Germanic languages:	16	0.09%
<b>Jasper</b>		
Spanish	239	0.68%
Arabic:	151	0.43%
Other Indo-European languages:	51	0.15%
<b>Johnson</b>		
Spanish	1,829	1.29%
Arabic:	1,528	1.08%
French, Haitian, or Cajun:	1,232	0.87%
<b>Jones</b>		
Chinese (incl. Mandarin, Cantonese)	122	0.63%
Spanish:	12	0.06%
French, Haitian, or Cajun:	10	0.05%
<b>Linn</b>		
Spanish	1,138	0.54%
Other Indo-European languages:	1,064	0.50%
French, Haitian, or Cajun:	669	0.32%
<b>Marshall</b>		
Spanish	3,470	9.33%
Other Asian and Pacific Island languages:	664	1.79%
Vietnamese:	162	0.44%
<b>Muscatine</b>		
Spanish	1,481	3.71%
French, Haitian, or Cajun:	73	0.18%



Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
Other and unspecified languages:	61	0.15%
<b>Polk</b>		
Spanish	9,939	2.20%
Other Asian and Pacific Island languages:	4,007	0.89%
Other and unspecified languages:	2,608	0.58%
<b>Poweshiek</b>		
Spanish	120	0.69%
Chinese (incl. Mandarin, Cantonese):	28	0.16%
Russian, Polish, or other Slavic languages:	24	0.14%
<b>Scott</b>		
Spanish	1,800	1.11%
Vietnamese:	857	0.53%
Other Indo-European languages:	335	0.21%
<b>Story</b>		
Chinese (incl. Mandarin, Cantonese)	2,175	2.34%
Spanish:	471	0.51%
Vietnamese:	372	0.40%
<b>Tama</b>		
Spanish	508	3.20%
Other and unspecified languages:	31	0.20%
German or other West Germanic languages:	29	0.18%
<b>Washington</b>		
Spanish	496	2.40%
German or other West Germanic languages:	141	0.68%
Chinese (incl. Mandarin, Cantonese):	37	0.18%

HUD outlines “safe harbor” guidelines in 72 FR 2732, which IEDA has followed to demonstrate strong evidence of compliance with HUD’s LEP requirements (see Table 3 below).





**Table 3: HUD’s LEP Safe Harbor Guidelines**

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

IEDA will translate vital documents<sup>1</sup> into Spanish as strong evidence of compliance because the LEP Spanish population is relatively large, especially in the MID areas of Marshall and Linn. Six languages (e.g., French, Vietnamese, Arabic) exceed the 1,000-person safe harbor threshold but are well below the 5% threshold; therefore, IEDA will not translate vital documents for these languages, but can provide “I Speak” cards and an on-demand language line 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 program 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 4 categorizes IEDA’s CDBG-DR programs by the extent to which they directly interact with members of the public. IEDA provides meaningful language access across all CDBG-DR programs, but IEDA will prioritize LEP training for subrecipients that works on programs that provide direct client assistance and regularly interact with the public.

**Table 4: Language Assistance by Program**

CDBG-DR Program	Direct Client Assistance?	Frequency of Public Contact
New Resilient Affordable SF Housing	Yes	Daily
Infrastructure to Support housing	Yes	Daily
Owner-Occupied Rehabilitation	Yes	Daily
New Housing - Rental	Yes	Daily
Tree Canopy and Tree Replanting Program	No	
Generators for Critical Facilities	No	

<sup>1</sup> 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**

IEDA prioritizes language access services for programs, activities, and services with the greatest impact on LEP individuals. IEDA’s LEP outreach focuses on CDBG-DR-funded activities that provide substantial direct benefits to participants including homeowners, landlords, renters, and small business owners.

### **Factor 4: Resources Available to IEDA and Costs**

IEDA is taking all reasonable steps to ensure meaningful access for LEP individuals 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 IEDA is taking to provide appropriate language assistance.

### **Language Assistance Measures**

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

#### **LAP Coordinator (MEDIUM EFFORT)**

IEDA designated a LAP Coordinator to oversee LAP implementation and compliance across its CDBG-DR programs. The LAP Coordinator ensures that IEDA staff understand their LAP responsibilities and they provide ongoing training and monitoring to ensure the provision of meaningful language assistance services. On a quarterly basis, IEDA’s LAP Coordinator, will check ACS data to confirm the language assistance required and check that applicable documents are translated into the required languages. **If IEDA staff or the public have questions about language access services, they should contact the LAP Coordinator:**

**Steven Stransky**, Disaster Recovery Team Lead  
Steven.Stransky@IowaEDA.com or Disaster@IowaEDA.com  
515.348.6204

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



**Table 5: Vital Documents by CDBG-DR Program**

CDBG-DR Program	Vital Documents
CDBG-DR 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
New Resilient Affordable SF Housing	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Infrastructure to Support housing	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Owner-Occupied Rehabilitation	Program guidelines, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
New Housing - Rental	Program guidelines, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Tree Canopy and Tree Replanting Program	Program guidelines, flyers, notices of funding availability, frequently asked questions, general program or federal compliance notifications
Generators for Critical Facilities	Program guidelines, flyers, notices of funding availability, frequently asked questions, general program or federal compliance notifications

### Language Line Services

IEDA uses a language line provider upon demand to ensure that LEP individuals understand IEDA’s CDBG-DR programs and services and can fully participate. As needed, IEDA can use this service to ensure that all individuals receive professional interpretation services.

### Website

IEDA’s [website](#) includes resources to help LEP individuals access key information about its CDBG-DR programs, including the Action Plan, program guidelines, applicable procurements, and the LAP coordinator’s email address and phone number.

### “I Speak” Cards

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

### LEP Outreach

IEDA 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.
- Encourage culturally-specific organizations' participation as subrecipients or contractors for outreach and intake.
- Participate in culturally-specific organizations' public events, providing staff and materials in Spanish.

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

### **Iowa Economic Development Authority Staff Training**

IEDA requires mandatory trainings for all IEDA staff that interact with the public through CDBG-DR programs. The training ensures that these staff members understand how to provide meaningful language assistance services to LEP individuals and covers the following:

- Definition of LEP individuals
- State of Iowa and federal regulations governing language access
- Cultural sensitivity
- Staff roles and responsibilities
- How to identify the language needs of an LEP individual
- IEDA language access procedures
- LAP complaints and appeals process

### **Complaints and Appeals**

IEDA reviews all comments or complaints received by citizens through email, phone, post mail, or in-person. Any written complaints concerning IEDA's compliance with this LAP will be referred to the IEDA LAP Coordinator, and they will provide a written response within 15 working days upon receipt of the complaint. The IEDA will maintain a copy of the written complaint and response. Complaints concerning the general provision of language assistance may be submitted via email, [Disaster@IowaEDA.com](mailto:Disaster@IowaEDA.com), or mail, 1963 Bell Avenue, Suite 200. Alternatively, complaints can be filed directly with the Fair Housing and Equal Opportunity (FHEO) Region VII Office at the following address:

**Kansas City Regional Office of FHEO**  
U.S. Department of Housing and Urban Development  
Gateway Tower II  
400 State Avenue, Room 200  
Kansas City, Kansas 66101-2406

### **Evaluating and Updating the LAP**

The IEDA LAP Coordinator will update this LAP annually as needed to reflect any change in the plan based on the prior year's demographic changes and to ensure relevancy and quality





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control of language access services. IEDA will review procedures for providing language access services, existing trainings, 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 IEDA to service this population evolve. 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



### ACS Data

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.

		Spanish	French, Haitian, or Cajun	German or other West Germanic languages	Russian, Polish, or other Slavic languages	Other Indo-European languages	Korean	Chinese (incl. Mandarin, Cantonese)	Vietnamese	Tagalog (incl. Filipino)	Other Asian and Pacific Island languages	Arabic	Other and unspecified languages
Benton	#	71	25	2	0	27	0	0	0	0	0	0	0
	%	0.30%	0.10%	0.01%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Boone	#	173	0	0	0	0	0	0	0	0	1	0	0
	%	0.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Cedar	#	77	0	0	0	0	0	0	0	0	0	0	21
	%	0.44%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.12%
Clinton	#	197	6	13	30	8	2	56	0	2	0	0	0
	%	0.45%	0.01%	0.03%	0.07%	0.02%	0.00%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%
Dallas	#	1,660	69	21	271	553	80	229	150	23	111	142	209
	%	1.99%	0.08%	0.03%	0.32%	0.66%	0.10%	0.27%	0.18%	0.03%	0.13%	0.17%	0.25%
Greene	#	128	0	0	0	0	0	0	0	21	4	3	0
	%	1.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.25%	0.05%	0.04%	0.00%
Grundy	#	63	0	7	0	3	0	15	0	0	0	0	0
	%	0.54%	0.00%	0.06%	0.00%	0.03%	0.00%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%
Guthrie	#	96	0	0	0	0	0	0	0	0	20	0	0
	%	0.95%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00%
Hardin	#	236	0	0	0	20	0	0	0	0	0	14	0

		Spanish	French, Haitian, or Cajun	German or other West Germanic languages	Russian, Polish, or other Slavic languages	Other Indo-European languages	Korean	Chinese (incl. Mandarin, Cantonese)	Vietnamese	Tagalog (incl. Filipino)	Other Asian and Pacific Island languages	Arabic	Other and unspecified languages
	%	1.46%	0.00%	0.00%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	0.00%
Iowa	#	66	0	32	11	0	0	0	0	0	7	0	2
	%	0.43%	0.00%	0.21%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.01%
Jackson	#	35	0	16	0	0	0	0	0	5	20	0	0
	%	0.19%	0.00%	0.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%	0.11%	0.00%	0.00%
Jasper	#	239	31	6	0	51	0	45	15	2	0	151	15
	%	0.68%	0.09%	0.02%	0.00%	0.15%	0.00%	0.13%	0.04%	0.01%	0.00%	0.43%	0.04%
Johnson	#	1,829	1,232	251	118	376	443	1,141	483	98	338	1,528	312
	%	1.29%	0.87%	0.18%	0.08%	0.26%	0.31%	0.80%	0.34%	0.07%	0.24%	1.08%	0.22%
Jones	#	12	10	0	0	0	0	122	7	0	0	0	0
	%	0.06%	0.05%	0.00%	0.00%	0.00%	0.00%	0.63%	0.04%	0.00%	0.00%	0.00%	0.00%
Linn	#	1,138	669	49	168	1,064	94	258	371	23	381	316	624
	%	0.54%	0.32%	0.02%	0.08%	0.50%	0.04%	0.12%	0.18%	0.01%	0.18%	0.15%	0.30%
Marshall	#	3,470	50	5	18	96	0	62	162	0	664	19	1
	%	9.33%	0.13%	0.01%	0.05%	0.26%	0.00%	0.17%	0.44%	0.00%	1.79%	0.05%	0.00%
Muscatine	#	1,481	73	1	26	5	10	10	0	0	39	35	61
	%	3.71%	0.18%	0.00%	0.07%	0.01%	0.03%	0.03%	0.00%	0.00%	0.10%	0.09%	0.15%
Polk	#	9,939	540	211	1,844	1,474	90	670	2,032	294	4,007	1,252	2,608
	%	2.20%	0.12%	0.05%	0.41%	0.33%	0.02%	0.15%	0.45%	0.07%	0.89%	0.28%	0.58%
Poweshiek	#	120	7	16	24	0	12	28	0	0	4	7	0

		Spanish	French, Haitian, or Cajun	German or other West Germanic languages	Russian, Polish, or other Slavic languages	Other Indo-European languages	Korean	Chinese (incl. Mandarin, Cantonese)	Vietnamese	Tagalog (incl. Filipino)	Other Asian and Pacific Island languages	Arabic	Other and unspecified languages
	%	0.69%	0.04%	0.09%	0.14%	0.00%	0.07%	0.16%	0.00%	0.00%	0.02%	0.04%	0.00%
Scott	#	1,800	149	54	17	335	144	147	857	207	214	50	22
	%	1.11%	0.09%	0.03%	0.01%	0.21%	0.09%	0.09%	0.53%	0.13%	0.13%	0.03%	0.01%
Story	#	471	20	0	47	289	361	2,175	372	49	206	37	182
	%	0.51%	0.02%	0.00%	0.05%	0.31%	0.39%	2.34%	0.40%	0.05%	0.22%	0.04%	0.20%
Tama	#	508	0	29	2	0	0	5	0	0	0	0	31
	%	3.20%	0.00%	0.18%	0.01%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.20%
Washington	#	496	0	141	0	6	0	37	0	8	0	0	0
	%	2.40%	0.00%	0.68%	0.00%	0.03%	0.00%	0.18%	0.00%	0.04%	0.00%	0.00%	0.00%
Total	#	24,305	2,881	854	2,576	4,307	1,236	5,000	4,449	732	6,016	3,554	4,088
	%	1.60%	0.19%	0.06%	0.17%	0.28%	0.08%	0.33%	0.29%	0.05%	0.40%	0.23%	0.27%



## I Speak Card

2004 Census Test	United States Census 2010	
<b>LANGUAGE IDENTIFICATION FLASHCARD</b>		
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում 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 untungnu' manaitai pat untungnu' 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

U.S. DEPARTMENT OF COMMERCE  
Economics and Statistics Administration  
U.S. CENSUS BUREAU



## APPENDIX B: Grantee Website Policies and Procedures for CDBG-DR

### Website Purpose

The State of Iowa must maintain a public website that permits individuals and entities awaiting assistance and the general public to see how all CDBG-DR grant funds are used and administered. The website must include copies of all relevant procurement documents and all grantee administrative contracts, details of ongoing procurement processes, and Action Plans and amendments. The public website must be accessible to persons with disabilities and individuals with LEP.

Website Component	Responsible IEDA Personnel
The action plan created using DRGR (including all amendments)	Disaster Recovery Team Lead
Each performance report (as created using the DRGR system)	Reimbursement Coordinator
Citizen Participation Plan	Disaster Recovery Team Lead
Procurement policies and procedures	Disaster Recovery Team Lead
All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts)	Reimbursement Coordinator
A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of procurement, requirements for proposals, etc.).	Reimbursement Coordinator

### Website Process

IEDA will ensure that the CDBG-DR comprehensive website is updated and is in compliance with the combined CDBG-DR notice (87 FR 6364, 2/3/22). Public Action Plan amendments will be posted within 15 days of HUD approval. IEDA website coordinator will use the CDBG-DR website checklist below to review the checklist for any updates 30 days prior to the end of each quarter. After completing the checklist review, any items determined to require an update will be updated before the end of the quarter. The website will be updated at minimum quarterly to post any new information.

#### Website Coordinator:

**Steven Stransky**, Disaster Recovery Team Lead  
 Iowa Economic Development Authority  
 1963 Bell Ave., Suite 200  
 Des Moines, IA 50315  
 Steven.Stransky@IowaEDA.com or Disaster@IowaEDA.com  
 515.348.6204





## Website Content

IEDA must make the following items available on its website:

- The Action Plan created using DRGR (including any amendments);
- Each performance report (as created using the DRGR system);
- Citizen participation plan;
- Procurement policies and procedures;
- All contracts, as defined in 2 CFR 200.22, that will be paid with CDBG-DR funds (including, but not limited to, subrecipients' contracts); and
- A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

Note: Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.1 and 200.67, are not required to be posted to a grantee's website.

## Quarterly CDBG-DR Website Update Checklist

<b>Website Reviewer</b>	
<b>Date of Review</b>	
<b>Date Updates Complete</b>	

Required Content	Date Posted	Update Needed	Date Updated	Comments
CDBG-DR Action Plan (DRGR Version)				
CDBG-DR Substantial Action Plan Amendment				
CDBG-DR Non-Substantial Action Plan Amendment				
DRGR Performance Report				
Citizen Participation Plan				
Procurement Policies and Procedures				
<b>Current Contracts with Vendors and Subrecipients</b>				
Type of Contract	Contract Posted?	Contracts Current?	Closed Contracts Archived	Comments
CDBG-DR Contracts (Vendors)				





Required Content	Date Posted	Update Needed	Date Updated	Comments
CDBG-DR Subrecipient Agreements				
<b>Active Procurements by Status</b>				
List Open Solicitations	Date Solicitation Opened	Date Solicitation Closed	Date Solicitation Awarded	Date Contract Posted to Website

