Language Access Plan for CDBG-DR Programs

Version 3.0

June 2025

Contents

Version History

Version	Date	Summary Description
1.0	06/13/2022	Approval of CDBG-DR CPP/LAP
2.0	01/27/2023	Revision to LAP data and language on "safe harbor" guidelines
3.0	06/2025	Made LAP a stand alone document. Added in 2025 CDBG-DR allocation. Updated the ACS data for both the 2020 and 2024 four factor analysis.

CDBG-DR Language Access Plan

CDBG-DR 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.

In this 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:

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

Subrecipients can use this LAP as an example of how to draft their own LAP for the CDBG-DR programs they administer.

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:

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

The sections below capture the four factor analysis completed by IEDA for each CDBG-DR award.

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2020 CDBG-DR Allocation – Four Factor Analysis

IEDA's CDBG-DR service area includes the following four (4) counties that were impacted by the 2020 Derecho: Benton (State MID), Linn (HUD MID), Marshall (State MID), Tama (State MID).

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 Iowa using 2023 American Community Survey (ACS) 5-Year data estimates (*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 by Primary Language Spoken (2023 Data)

2023 Primary Language Spoken	Number who speak English less than very well	Percentage of Primary Language Spoken who speak English less than very well statewide
Spanish	55,481	40.53%
Other Asian and Pacific Island	12,135	45.49%
Other and unspecified	7,258	41.95%
Vietnamese	5,538	67.84%
Other Indo-European languages	4,774	30.99%
Russian, Polish, or other Slavic	4,564	37.44%
French, Haitain, or Cajun	4,548	51.11%
Arabic	3,999	40.88%
Chinese	3,929	42.62%
German or other West Germanic languages	3,626	21.67%

Table 2 below demonstrates the top 3 LEP populations of the service area, by county using 2023 American Community Survey (ACS) 5-Year data estimates (*Table C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*). The counties listed below include all of the disaster affected counties declared and documented in DR-4557 and not just the HUD and State MIDS of Marshall, Benton, Tama, and Linn.

Table 2: Top 3 LEP populations, county

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well based on Total People in County
Benton		
Spanish	88	0.36%
French, Haitian, or Cajun	11	0.05%
German or other West Germanic languages	9	0.04%
Boone		
Other Asian and Pacific Island languages	21	0.08%
Spanish	14	0.06%
None	N/A	N/A
Cedar		
Spanish	31	0.18%
Other and unspecified languages	9	0.05%
Other Indo-European languages	7	0.04%
Clinton		
Spanish	177	0.40%
Chinese (incl. Mandarin, Cantonese)	79	0.18%
Other and unspecified languages	36	0.08%
Dallas		
Spanish	1,643	1.69%
Russian, Polish, or other Slavic languages	615	0.63%
Other indo-European languages	436	0.45%
Greene		
Spanish	78	0.94%
German or other West Germanic	13	0.16%
None	N/A	N/A

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well based on Total People in County
Grundy		
Spanish	57	0.49%
Other Indo-European languages	9	0.08%
German or other West Germanic languages	8	0.07%
Guthrie		
Spanish	42	0.41%
Other Indo-European languages	30	0.30%
Other Asian	4	0.04%
Hardin		
Spanish	297	1.86%
Vietnamese	38	0.24%
Tagalog	16	0.10%
Iowa		
Spanish	45	0.29%
Russian, Polish, or other Slavic languages	25	0.16%
German or other West Germanic	14	0.09%
Jackson		
Spanish	59	0.32%
Other Asian languages	33	0.18%
Vietnamese	10	0.05%
Jasper		
Spanish	410	1.14%
Arabic	173	0.48%
Chinese (incl. Mandarin, Cantonese)	49	0.14%
Other Asian	49	0.14%
Johnson		
Spanish	1,734	1.18%
Arabic:	1,195	0.82%
French, Haitian, or Cajun:	1,087	0.74%
Jones		
Spanish	77	0.39%

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well based on Total People in County
Other Indo-European	11	0.06%
N/A	N/A	N/A
Linn		
Spanish	1,386	0.64%
Other Indo-European languages	1,168	0.54%
French, Haitian, or Cajun	760	0.35%
Marshall		
Spanish	3,574	9.51%
Other Asian and Pacific Island languages	959	2.55%
Vietnamese	183	.049%
Muscatine		
Spanish	1,565	3.89%
French, Haitian, or Cajun	139	0.35%
Arabic	48	0.12%
Polk		
Spanish	13,302	2.86%
Other Asian and Pacific Island languages	4,845	1.04%
Other and unspecified languages	3,278	0.71%
Poweshiek		
Spanish	163	0.92%
German or other West Germanic	42	0.24%
Chinese (incl. Mandarin, Cantonese)	22	0.12%
Scott		
Spanish	1,628	0.99%
Vietnamese	602	0.37%
French, Haitian, or Cajun	339	0.21%
Story		
Chinese (incl. Mandarin, Cantonese)	996	1.06%
Korean	569	0.60%

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well based on Total People in County
Spanish	503	0.53%
Tama		
Spanish	487	3.05%
Other and unspecified languages	58	0.36%
French, Haitian, or Cajun	40	0.25%
Washington		
Spanish	549	2.17%
German or other West Germanic languages	79	0.37%
Chinese (incl. Mandarin, Cantonese)	55	0.26%

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[1] into Spanish as strong evidence of compliance because the LEP Spanish population is relatively large, especially in the MID areas of Marshall and Linn. Although five other languages (e.g., French, Indo-European, Other Asian and Pacific Island, Arabic, and Chinese) exceed the 1,000-person safe harbor threshold, IEDA has determined that based on communications with stakeholders, the number and percentages of the market area-eligible population, expected beneficiaries and applicants of the program that speak a specific language, and the cost of translating documents, IEDA will not translate vital documents for these languages. IEDA will provide an on-demand request of services in all the languages

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[1] A "vital document" is defined as a document that includes information regarding program eligibility requirements, applications and instructions, program eligibility determinations, and appeals procedures.

listed above if requested. When necessary to improve participation and outreach of the grant programs, IEDA will revisit this determination on which languages are vital.

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 will not interact directly with clients. Instead the programs will be run by subrecipients. IEDA will prioritize LEP training for subrecipients that work on programs that provide direct client assistance and regularly interact with the public.

Table 4: Language Assistance by Program for IEDA produced documentation

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

Table 5 lists the vital documents by program. These documents are either produced by IEDA or the subrecipients.

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

CDBG-DR Program	Vital Documents
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

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. Then Language Assistance Measures section below outlines the reasonable steps that IEDA will take to provide appropriate language assistance during each disaster.

2024 CDBG-DR Allocation – Four Factor Analysis

IEDA's CDBG-DR service area includes the following four (4) disaster declared counties designated by HUD as the most immacted and distressed (MID): Cherokee, Clay, Sioux, Woodbury.

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 Iowa using 2023 American Community Survey (ACS) 5-Year data estimates (*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 by Primary Language Spoken (2023 Data)

2023 Primary Language Spoken	Number who speak English less than very well	Percentage of Primary Language Spoken who speak English less than very well
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Other Asian and Pacific Island	12,135	45.49%
Other and unspecified	7,258	41.95%
Vietnamese	5,538	67.84%
Other Indo-European languages	4,774	30.99%
Russian, Polish, or other Slavic	4,564	37.44%
French, Haitain, or Cajun	4,548	51.11%
Arabic	3,999	40.88%
Chinese	3,929	42.62%
German or other West Germanic languages	3,626	21.67%

Table 2 below demonstrates the top 3 LEP populations of the service area, by county using 2023 American Community Survey (ACS) 5-Year data estimates (*Table C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*). The counties listed below include the HUD MIDS.

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 based on Total People in County
Cherokee		
Spanish	253	2.30%
Araboc	12	0.11%
N/A	N/A	N/A
Clay		
Spanish	83	0.53%
Other Asian	10	0.06%
German or other West Germanic languages	3	0.02%
Sioux		
Spanish	1,503	4.5%
Vietnamese	20	0.06%

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well based on Total People in County
Other Indo-European languages	12	0.04%
Woodbury		
Spanish	6,172	6.26%
Vietnamese[2]	989	1.00%
Other and unspecified languages	346	0.35%

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[3] into Spanish as strong evidence of compliance because the LEP Spanish population is over 1,000 in the MID areas of Sioux and Woodbury. No other languages except Spanish exceeded the 1,000-person safe harbor threshold. IEDA will not translate vital documents for the other listed top 3 languages. IEDA will provide an on-demand request of services in all the languages listed above if requested. When necessary to improve participation and outreach of the grant programs, IEDA will revisit this determination on which languages are vital.

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

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[2] For the 2020 and 2024 CDBG-DR grants, IEDA is electing not to translate the Action Plan and Program Guidelines into Vietnamese. Through community surveys and feedback, no requests were made for Vietnamese translation. However, as needed, program fact sheets may be translated into Vietnamese to help improve program participation.
[3] A "vital document" is defined as a document.

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programs, but will not interact directly with clients. Instead the programs will be run by subrecipients. 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 for IEDA produced documentation

CDBG-DR Program	Direct Client Assistance?	Frequency of Public Contact
New Housing Construction Single Family Owner-Occupied Program	No	
New Housing Construction Rental Program	No	
Infrastructure in Support of Housing	No	
General Infrastructure	No	
FEMA Non-Federal Match	No	

Table 5 lists the vital documents by program. These documents are either produced by IEDA or the subrecipients.

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 Housing Construction Single Family Owner-Occupied	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
New Housing Construction Rental Program	Program guidelines and updates, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
Infrastructure in Suport of Housing	Program guidelines, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
General Infrastructure	Program guidelines, flyers, notices of funding availability, grant and loan agreements, frequently asked questions, general program or federal compliance notifications
FEMA Non-Federal Match	Program guidelines, flyers, notices of funding availability, frequently asked questions, general program or federal compliance notifications

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. Then Language Assistance Measures section below outlines the reasonable steps that IEDA will take to provide appropriate language assistance during each disaster.

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. Periodically, 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:**

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Des Moines, IA 50315
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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.

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.

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.

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, 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 periodically 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. 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