

APPENDIX I

Policy and Procedure for Maintaining a Comprehensive Website

State of Louisiana

Certification Checklist

Prepared by
Louisiana Office of Community Development/Disaster Recovery Unit

Comprehensive Website Policy

Version: 1.2

Dated: 8/4/2022

Summary: The purpose of this policy is to define the guidelines LOCD will follow to maintain a comprehensive website for all disaster recovery and mitigation activities funding under federal grants.

Applicable Laws: The website will comply with 24CFR8.6 and the Americans with Disabilities Act by ensuring effective communication with applicants, beneficiaries and members of the public including individuals with disabilities, protected classes, vulnerable populations, and individuals from underserved communities.

The following policy applies to both CDBG Disaster Recovery (CDBG-DR) and CDBG Mitigation (CDBG-MIT) grant funds.

The State will develop and maintain a comprehensive website dedicated to the state of Louisiana's CDBG-DR and CDBG-MIT programs and related activities associated with these funds. The Communications Section will serve as website managers responsible for updating the site on at least a quarterly basis, or more frequently, if needed.

Procedures

At a minimum, websites will contain the following items for each federal grant:

- Action Plans, including Action Plan Amendments, Approved Action Plans, Activities/program information for activities described in the action plans
- Citizen participation requirements
- Reports, including Quarterly Performance Reports (QPR) and Quarterly Expenditure Reports
- Expenditure and Outcome Projections (starting with P.L. 113-2 Hurricane Sandy)
- Procurement policies and procedures
- Contracts including a copy of executed contracts procured for the grant by the grantee including a list of all subrecipient vendors (starting with P.L. 113-2 Hurricane Sandy),
- A summary including the description and status of services or goods currently being procured.

LOCD staff will send programmatic documents to the website content manager via email, requesting that these items are posted in the appropriate section. Action Plans and Substantial

Action Plan Amendments are published with corresponding translations in Spanish and Vietnamese. Citizens can comment on these plans via a link associated with the plan.

LOCD has a Language Access Plan for Limited English Proficiency Persons (LAP) that can be found on LOCD's website at <https://www.doa.la.gov/doa/oed/resources/> or **Appendix A**. The LAP defines the actions taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency. The LAP was created to reduce language barriers that can preclude meaningful access by LEP persons to LOCD Programs.

Responsible Party: The responsible party for maintaining a comprehensive website for both CDBG-DR and CDBG-MIT grants will be the Deputy Executive Director and may be contacted at 225-219-9600.

APPENDIX A

Language Access Plan for Limited English Proficiency Persons

Prepared by
Louisiana Office of Community Development/Disaster Recovery Unit

2019 State of Louisiana
Office of Community Development
Language Access Plan for Limited English Proficiency Persons

I. Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The Louisiana Office of Community Development (OCD) is a recipient of federal funds for a portion of its programs and, thus obligated to reduce language barriers that can preclude meaningful access by LEP persons to OCD Programs. OCD has prepared this Language Access Plan (LAP), which defines the actions to be taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency.

In preparing this LAP, OCD conducted a four-factor analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the OCD or its federally funded programs, (2) frequency with which LEP persons come into contact with the Agency's programs, (3) nature and importance of the program, activity, or service to people's lives, and (4) resources available and costs. OCD will review and update, on an annual basis, this LAP in order to ensure continued responsiveness to community needs.

II. Description of Covered Programs

The Louisiana Office of Community Development within the Division of Administration is home to the following federal and state grant programs:

- A. Louisiana Community Development Block Grant Program (LCDBG) The LCDBG Program is a federally funded (HUD) program which provides grants to units of local government in non-entitlement areas for the development of viable communities by providing a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Grants are made to these communities for primary needs such as potable water, water for fire protection, sewer, streets, and economic development activities.
- B. Disaster Recovery Unit (DRU)
HUD CDBG Disaster allocations dedicated to recovery from Hurricanes Katrina, Rita, Gustav, Ike, and Issac. These funds have and continue to be allocated to housing, infrastructure, economic development and planning programs for recovery in the storm-impacted areas.
- C. Local Government Assistance Program (LGAP)
LGAP funds are used to assist units of local government for needed infrastructure and long-term capital improvements in rural areas. The LGAP Program is designed to fill the gaps where there are no federal or other state funds available

to assist a unit of local government with an identified high priority need. Priority is given to those projects which identify and resolve basic human health and safety needs.

D. Community Water Enrichment Fund (CWEF)

The purpose of the Community Water Enrichment Program (CWEF) is to assist units of local government with funding for needed infrastructure and long-term capital improvements for potable water projects in rural areas. The CWEF Program is designed to fill the gaps where there are no federal or other state funds available to assist a unit of local government with an identified high priority need for potable water improvements. Priority is given to those projects which identify and resolve basic human health and safety needs.

III. Four-factor Analysis

The following four-factor analysis will serve as the guide for determining which, if any, language assistance measures the OCD will undertake to provide access to the covered programs for LEP persons. Additionally, all future CDBG fund recipients will be required to use the same four-factor analysis prior to the release of funds.

- A. Number or proportion of LEP persons eligible to be served or likely to be encountered by the OCD or its federally funded programs. Per the 2013-2017 American Community Survey 5-Year estimates, Louisiana's population is 4,353,030.

Approximately 91.7% of Louisiana's population speak only English, and 8.3% speak a language other than English. 3.6% of Louisiana's population speak Spanish, and 3.0% speak other Indo-European languages and 1.3% speak Asian and Pacific Island Languages. No other ethnicity has a sizeable limited English proficiency.

The table below shows the LEP percentages for each of the above mentioned languages.

Language 1 (name)	Population That Speaks a Language Other Than English	LEP Number	LEP % of Total Louisiana Population
Spanish	161,384	73,584	1.69%
Other Indo-European	129,835	22,791	.52%
Asian and Pacific Island	55,163	27,547	.63%

1. LCDBG – Eligible applicants to the LCDBG program are non-entitlement communities in Louisiana. Sub-recipients must consider the service area of their project/activity to conduct the four-factor analysis.
 2. DRU – The DRU translates actions plans into Vietnamese and Spanish based on census data for impacted areas.
 3. LGAP – All Louisiana municipalities and parishes are eligible to apply for funds excluding the HUD entitlement cities: Alexandria, Baton Rouge, Bossier City, Kenner, Lafayette, Lake Charles, Monroe, New Orleans and Shreveport.
 4. CWEEF –All Louisiana municipalities and parishes are eligible to apply for funds excluding the HUD entitlement cities: Alexandria, Baton Rouge, Bossier City, Kenner, Lafayette, Lake Charles, Monroe, New Orleans and Shreveport.
- B. Frequency with which LEP persons come into contact with the programs
1. LCDBG – Throughout the history of the LCDBG Program, OCD has not encountered a LEP person. Also, the OCD has not received notification from a sub recipient of an encounter with a LEP person. Since all LCDBG funds are granted to local governments, any direct beneficiaries who are LEP are more likely to communicate directly with the subrecipients. As a result the sub-recipients will be required to develop a LAP prior to the release of funds.
 2. DRU – DRU does not have any record of encounters with LEP persons.
 3. LGAP – There are no direct beneficiaries of the LGAP; all funds are granted to local governments.
 4. CWEEF – There are no direct beneficiaries of the CWEEF Program; all funds are granted to local governments.
- C. Nature and importance of the program, activity, or service provided by the program
1. LCDBG – While LCDBG programs deal mostly with public infrastructure, there is some direct benefit to the beneficiaries of sewer and water hook-ups on private property. Gathering of income data in order to determine income level can result in contacting a LEP person(s). Also, CDBG has a Citizen Participation requirement in order for OCD as well as local governments to identify the community development needs and priorities. It will be necessary to ensure proper communication in order to complete these tasks.
 2. DRU – DRU has various types of programs and participates in direct benefit activities. Also, CDBG has a Citizen Participation requirement in order for OCD as well as local governments to identify the community development needs and priorities. It will be necessary to ensure proper communication in order to complete these tasks.
 3. LGAP – There is no direct benefit in this program.
 4. CWEEF – There is no direct benefit in this program.

- D. Resources available and costs to the recipient
 - 1. LCDBG/DRU – A contract for written translation services with Tembua: The Precision Language Solution is in effect through June 30, 2020.
 - 2. LGAP – No resources are needed, as there are no documents produced which are necessary for public viewing.
 - 3. CWEEF – No resources are needed, as there are no documents produced which are necessary for public viewing.

IV. Actions to be taken by OCD

After careful consideration of the four-factors identified above, the OCD will take the following actions:

- A. OCD has appointed the following Language Access Coordinator to serve for all programs:
 - 1. James Martin, OCD/LCDBG Program, 1201 North Third Street, Ste. 3-150, Baton Rouge, LA 70802, (225)342-7412
- B. The OCD LAP will be distributed to all OCD staff members and posted on the OCD website.
- C. All OCD Receptionists and the Language Access Coordinator will maintain and be trained to use an I Speak Language Identification Document for use during encounters with LEP persons. After the appropriate language has been identified, the OCD Receptionist will contact the Language Access Coordinator for further instructions. If the need for access services is identified either by phone or email, OCD staff shall immediately contact their Language Access Coordinator who will take appropriate action to ensure meaningful communication.
- D. LCDBG Consolidated Plans and Consolidated Annual Action Plans and Substantial Amendments will be published in Spanish on the OCD website. DRU will continue to translate appropriate documents in Spanish and/or Vietnamese as previously established. All published OCD citizen participation advertisements will include a statement in Spanish indicating materials are available in Spanish upon request.
- E. All LCDBG and DRU sub-recipients beginning in FY 2016 and beyond will be required to conduct a Four-factor Analysis and develop a LAP as required by Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166, which states that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency.