HOUSTON IMMIGRATION
LEGAL SERVICES COLLABORATIVE

HUMANITARIAN ACTION PLAN

March 2019

Recommendations for Coordinated Emergency Planning to Increase Immigrant Resilience

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EXECUTIVE SUMMARY

IMMIGRANT RESILIENCE IS FOUNDATIONAL TO THE HOUSTON REGION'S RESILIENCE.

CASE STATEMENT

When Hurricane Harvey hit the Texas Gulf Coast in August 2017, many called it an equal opportunity disaster. But immigrants are disproportionately impacted and slower to recover from natural disasters than those born in the United States.[1] Immigrant resilience is essential to our region's resilience – our ability to withstand and mitigate the stress of disaster.

In 2017, 23% (1.6 million) of the Greater Houston region's residents were born in another country. While an estimated 506,000 (33%) of immigrants are undocumented (10% of the total region), many more families have "mixed" legal status, meaning citizens and non-citizens live in the same household.[2] In 2016, immigrant households contributed $124.7 billion (26%) to the Houston metro area's gross domestic product (GDP), held $38.2 billion in spending power, and contributed $3.5 billion in state and local taxes.[3] Immigrants are critical to Houston's workforce. In 2016, 32% of workers were immigrants, and 10% were unauthorized. In the aftermath of Hurricane Harvey, construction workers – more than half of whom are immigrants – were in particularly high demand.[4]

Immigrants, particularly low-income immigrants, are disproportionately impacted by disasters. A December 2017 survey found that immigrants were more likely than U.S.-born respondents to report income or job loss due to Harvey (64% versus 39%). Research has long documented that less-privileged residents often suffer losses in economic, social, and cultural resources after disasters, while more-privileged residents tend to recover more quickly and may even benefit financially. In fact, the more aid an area receives from the Federal Emergency Management Agency (FEMA), the more wealth inequality grows as a result of both physical damages and how recovery resources are designed and distributed.[5]

A November 2017 survey of 351 day laborers found that nearly two-thirds (64%) who identified as being undocumented indicated they do not feel safe asking for help from government officials for fear of risking their own or their family's security.[6] Despite growing anti-immigrant policy on the federal and state level, the Houston region's sentiment toward immigrants grows more positive annually. Harris County residents who favor granting undocumented immigrants a path to citizenship if they speak English and have no criminal record grew from 75% in 2014 to 82% in 2018.[7]

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1 Bryan Wu, Liz Hamel, Mollyann Brodie, Sim Shao-Chee, and Elena Marks, Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast, Kaiser Family Foundation and Episcopal Health Foundation, March 2018, https://www.kff.org/disparities-policy/report/hurricane-harvey-experiences-immigrants-texas-gulf-coast/.

2 Randy Capps and Ariel G. Ruiz Soto, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape, Migration Policy Institute, 2018. See also: https://www.parkviewmc.com/app/files/public/1484/2016-Poverty-Level-Chart.pdf.

3 "New Americans in Houston: A Snapshot of the Demographic and Economic Contributions of Immigrants in the Metro Area," New American Economy, accessed March 2019, https://www.newamericaneconomy.org/city/houston/.

4 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

5 Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," Social Problems, spy016, accessed March 2019, https://doi.org/10.1093/socpro/spy016.

6 Nik Theodore, After the Storm: Houston's Day Labor Markets in the Aftermath of Hurricane Harvey, University of Illinois at Chicago, November 2017.

7 Stephen L. Klineberg, The 2018 Kinder Houston Area Survey: Tracking Responses to Income Inequalities, Demographic Transformations, and Threatening Storms, Kinder Institute for Urban Research, 2018, https://kinder.rice.edu/houstonsurvey2018.

PREREQUISITES

We must use our continued Harvey recovery efforts to build the systems needed for a more equitable recovery for immigrants, regardless of legal status, through future disasters for a more resilient region.

HILSC calls on Harris County and City of Houston government and non-profit agencies, including funders, to incorporate HAP recommendations into their strategic emergency planning. HILSC and our network of more than forty organizations have already begun. We thank Houston Mayor Turner for his Welcoming Houston commitment to coordinate with the Department of Homeland Security Emergency Preparedness in the development of a disaster preparedness plan focused on immigrants and refugees and stand ready to partner in this complex endeavor.[8]

Fundamentally, decision makers must:

1. Ensure the data informing policy and funding decisions includes vulnerable populations, including immigrants of all statuses, looking to experts like the Migration Policy Institute and Center for Migration Studies for best practices that can be applied locally.
2. Inform policy and funding decisions with existing studies that document immigrants' experience in Harvey response and recovery [Appendix A]. This includes HILSC's HAP and many of the studies cited within it. Additional data (prerequisite #1) is needed to understand where those stories apply in terms of geography and socio-economics to target planning successfully.
3. Consult with immigrant-serving organizations and their immigrant constituents in emergency management planning, who can inform an infrastructure that serves as a conduit between decision makers and immigrant-serving organizations and their clients throughout the region.

THE HUMANITARIAN ACTION PLAN

When Hurricane Harvey struck the gulf coast, HILSC stepped up for immigrants in response and recovery, and is now building systems for the next disaster. HILSC developed 34 Humanitarian Action Plan (HAP) recommendations, including nine HILSC commitments to guide coordinated emergency management planning for immigrants. The HAP is based on interviews with over 80 people from more than 40 agencies – including undocumented immigrants, immigrant-serving and emergency management professionals, and decision makers on funding and policy. The expertise of immigrant-serving and emergency management organizations have seldom been brought together in one plan.

8 Accessible at www.welcominghouston.org.

Our research surfaced three primary opportunities to increase immigrant resilience:

1 Inclusive communication

Accurate, timely, and actionable information must be provided to immigrants in accessible language to increase the efficiency of response and recovery, reduce rumors, and help them connect with resources.

2 Accessible resources

Preparedness, response, and recovery assistance – particularly privately-funded aid – must be available, accessible, and understandable to all immigrants.

3 Culturally-competent approaches

All who play a role in emergency management must understand and address the core needs of immigrants and strategically design policies, services and materials to meet those needs.

Our recommendations can be accessed via HILSC's website, and filtered by Disaster phase (preparedness, response, recovery), implementation level (federal/state, county/city, nonprofit), implementation approach (policy, program/operations, funding) and opportunities (inclusive communications, accessible resources, culturally-competent approaches). We will also provide progress updates. Please share your successes as together we build a welcoming and resilient region: http://hap.houstonimmigration.org.

RECOMMENDATIONS:

The Humanitarian Action Plan (HAP) is a coordinated emergency management plan to increase immigrant resilience, contribute to a more efficient and effective disaster response and recovery, and improve the health and safety of all through future disasters. * denotes a HILSC committment.

1) Federal Enforcement
Suspend immigration enforcement within 200 miles of disaster zones, including operations at Customs and Border Patrol check points, to ensure that people can move safely for evacuation and re-entry, to access resources, and to reach recovery job sites.
Proposed implementers: U.S. Department of Homeland Security

2) FEMA Applications
Provide clear communication on the FEMA disaster assistance application process, including how to efficiently work through the process, where to access assistance, and organizational training, to increase recovery assistance to eligible disaster victims.
Proposed implementers: Federal Emergency Management Agency (FEMA)

3) Complete Data
Develop data to accurately understand the impact of a disaster on vulnerable populations, including immigrants, and coordinate public and private recovery resources to ensure private resources reach those who are not eligible for FEMA and other federal assistance.
Proposed implementers: exas General Land Office, Harris County and City of Houston agencies, academic institutions, and funding agencies

4) Informed Decisions
Inform policy and funding decisions with: 1- existing studies which document immigrants' experience in Harvey response and recovery and 2- immigrant-serving organizations' expertise, in order to fill gaps and address unintentional barriers to emergency and recovery services for immigrants.
Proposed implementers: Harris County and City of Houston agencies

5) Organizational Barriers
Assess organizational policies and practices to identify and remedy unintentional barriers to immigrant access to secure services. Such actions include strengthening inclusivity statements and similar policies as well as all ensuring all staff and volunteers practice inclusion.
Proposed implementers: All public and private emergency service providers

6) Chemical Response Plan
Develop and implement a regional chemical response plan, guided by recommendations from the Environmental Integrity Project's August 2018 report to ensure minimal damage to ship channel industries and affected residents, the workforce and first responders in their proximity and throughout the region.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, and Harris County Public Health, in consultation with governments of cities within the county and local environmental justice advocates including Tejas

7) Safe, Affordable Housing
Protect low-income homeowners and renters and the neighborhoods they live in by 1) increasing affordable housing supply, 2) improving and enforcing building safety codes, and 3) expanding and/or clarifying acceptable forms of identification required for disaster recovery applications.
Proposed implementers: Harris County and City of Houston housing agencies and departments

8) Labor Protections
Partner with local worker centers to ensure the health and safety of second responders who are cleaning and rebuilding our region, and reduce violations of employment laws.
Proposed implementers: Harris County and City of Houston agencies, local worker centers and unions, and funders

9) Immigrants with Disabilities
Ensure the response and recovery needs of immigrants with disabilities are met, guided by Living Hope Wheelchair Association's report, Pre-existing Conditions in a Time of Disasters: Challenges and Opportunities Advancing an Equitable Recovery for Vulnerable Populations.
Proposed implementers: Harris County and City of Houston agencies, and emergency response and recovery providers

10) Preparedness Literacy
Develop disaster preparedness information in the top six languages spoken in the Houston area, at a sixth-grade reading level in order to increase access to information and improve the security of all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management and City of Houston Office of Emergency Management

11) Continuations of Operations Plan (COOP) Training
Provide Continuation of Operations Plan (COOP) training to immigrant-serving organizations to ensure these expert, trusted agencies have an emergency management plan in place and are therefore available for response and recovery.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and City of Houston Office of New Americans and Immigrant Communities

12) Information Dissemination
Coordinate with immigrant advocates on immigrant-specific disaster information and disseminate to local media to increase access to accurate, timely, and actionable information.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, City of Houston Office of New Americans and Immigrant Communities, and Texas Organizing Project

13) Immigrant-Specific Information
Provide the HILSC FAQ to first responders and frontline volunteers, shelters, and relief centers to increase access to accurate, timely, and actionable information and assistance for all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, City of Houston Office of New Americans and Immigrant Communities, the American Red Cross, and emergency shelter managers

14) Automatic Emergency Notification
Develop an automatic registration system for emergency notifications (e.g., through the Harris Health Financial

Assistance Program, Houston Public Library, 211 Helpline, and/or others), to increase access to accurate information for all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and potentially Harris Health, Houston Public Library, United Way, and/or other organizations

15) Non-English Media Plan
Ensure Ready Harris and Ready Houston have an outreach plan targeting non-English media, informed by immigrant advocates, to increase access to timely, accurate, and actionable information for all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and City of Houston Office of New Americans and Immigrant Communities

16) Verify Immigrant-Specific Information *
Identify, verify, and disseminate emergency information specific to immigrants via HILSC FAQ, Immigrant Rights Hotline (833.HOU.IMMI), and the NeedHOU website; and provide to Emergency Operations Centers and ONIAC to distribute to shelters and relief centers to increase immigrant access to accurate, timely, and actionable information.
Proposed implementers: HILSC members and partners

17) Emergency Notification via Schools
Partner with school districts to communicate emergency information via their robocall and text messaging systems to increase access to accurate information for all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management and City of Houston Office of Emergency Management

18) Immigrant Community Liaison
Serve as the point of contact for local Emergency Operation Centers for immigrant-related issues and ensure that emergency communications are linguistically and culturally appropriate to increase access to accurate, timely, and actionable information for all.
Proposed implementers: City of Houston Office of New Americans and Immigrant Communities
Disaster phase: Response

19) Language Access for First Responders
Coordinate the availability of multilingual volunteers and language access technology for first responders and client-facing providers at shelters and supply centers to increase access to assistance for non-English speaking people.
Proposed implementers: City of Houston Office of New Americans and Immigrant Communities

20) Cultural Safety Training *
Implement staff and volunteer cultural safety and mental health/self-care workshops to improve access to safe, secure response and recovery resources for all.
Proposed implementers: Federal Emergency Management Agency (FEMA), the American Red Cross, and other organizations and agencies that provide emergency services

21) Immigrant Accessibility Index
Ensure United Way's 211 Helpline includes data fields to identify organizations that provide secure disaster services for immigrants. Employ HILSC's Immigrant Accessibility Index to identify organizations with low barriers to

services and increase access to resources.
Proposed implementers: United Way

22) Safe Emergency Shelters
Ensure the Department of Homeland Security, including Immigration and Customs Enforcement, are not present at emergency shelters, supply centers, food pantries, and other relief centers where disaster victims receive services to ensure immigrants feel safe accessing these resources.
Proposed implementers: Managing organizations of emergency shelters, supply centers, food pantries, and other emergency relief centers

23) Non-Discrimination Policies
Post summaries of non-discrimination policies, inclusivity statements, or similar policies in at least Spanish and English along with translations available in the additional top five languages spoken in Houston outside of emergency shelters, supply centers, food pantries, and other relief centers to increase access to safe, secure response and recovery resources for all.
Proposed implementers: Managing organizations of emergency shelters, supply centers, food pantries, and other emergency relief centers

24) Disaster Case Management *
Coordinate funding streams and disaster case management (DCM) organization grantees to: 1- provide cultural competency and mental health/self care training and support to case managers 2- include grassroots organizations in DCM funding systems, and 3- train case managers to identify legal issues after a disaster and provide a referral process to legal service providers to increase efficiency and successfully close more cases.
Proposed implementers: HILSC, United Way, and other case management funders

25) Legal Services
Invest in increasing the capacity of civil and immigration legal services, and support coordination with disaster case managers to ensure that legal needs are met, and case management is more efficient.
Proposed implementers: Funders

26) Mental Health
Identify and provide funding to organizations working with immigrants for social work staff and/or systems to support client mental health and wellness through individual or group support.
Proposed implementers: Funders

27) Immigration Legal Aid at Shelters *
Develop a Memorandum of Understanding with Lone Star Legal Aid, Houston Volunteer Lawyers, and HILSC to coordinate immigration and civil legal aid at major shelters and in response to case manager referrals to ensure availability of accurate, timely, and actionable information and improve access to resources.
Proposed implementers: Texas State Bar, Lone Star Legal Aid, Houston Volunteer Lawyers and HILSC

28) Legal Issue Summaries *
Be a source of relevant and timely legal issue summaries to increase accurate, timely, and actionable information for immigrant legal service providers.
Proposed implementers: HILSC members and partners

29) Potential Litigation *
Identify potential litigation needs, informed by HILSC partners, to increase access to FEMA and other response and recovery assistance and improve outcomes for low-income immigrants.
Proposed implementers: HILSC members and partners

30) Representation to Media *
Represent and connect organizations providing immigrant legal services with local and national media to increase the accurate and timely dissemination of actionable information.
Proposed implementers: HILSC members and partners

31) Representation in Planning *
Represent immigrant interests at emergency planning and funding meetings to inform processes with best practices to serve immigrants to ensure accessible resources.
Proposed implementers: : HILSC members and partners

32) Continuation of Operations Plan (COOP) Development *
Create a Continuation of Operations Plan (COOP) to ensure that expert, trusted agencies have an emergency management plan in place and are therefore available for response and recovery.
Proposed implementers: Immigrant-serving organizations

33) Cash Assistance
Raise funds for financial assistance to immigrants whose needs were created or worsened by a disaster, and disperse those funds to vetted organizations serving immigrants regardless of status.
Proposed implementers: Foundations

34) Emergency Preparedness *
Provide emergency preparedness training and kits to immigrants in order to increase knowledge and preparedness of immigrants, enable a more efficient recovery, and build resilience.
Proposed implementers: Church World Service and HILSC members and partners

	Disaster Phase			Level			Approach			Theme		
	Preparedness	Response	Recovery	State/National	County/City	Non-profit	Policy	Program / Operations	Funding	Inclusive Communications	Accessible Resources	Culturally informed
1) Federal Enforcement		●		●			●				●	
2) FEMA Applications	●		●	●				●			●	
3) Complete Data	●	●	●	●	●	●			●		●	
4) Informed Decisions	●					●	●		●		●	
5) Organizational Barriers	●				●	●	●				●	
6) Exclusionary County Policy	●		●		●		●				●	
7) Chemical Response Plan		●			●		●					●
8) Safe, Affordable Housing	●		●		●		●				●	
9) Labor Protections	●		●			●	●				●	
10) Immigrants with Disabilities		●			●	●	●				●	
11) Preparedness Literacy	●				●			●			●	
12) COOP Training	●				●			●			●	
13) Information Dissemination	●	●			●		●			●		
14) Immigrant-Specific Information		●		●	●	●	●			●		
15) Automatic Emergency Notification	●				●		●			●		
16) Non-English Media Plan	●	●			●		●			●		
17) Verify Immigrant-Specific Information			●			●		●		●		
18) Emergency Notification via Schools	●				●		●			●		
19) Immigrant Community Liaison		●			●		●			●		
20) Language Access for First Responders	●	●			●		●				●	
21) Cultural Competency Training	●		●	●	●	●	●					●
22) Immigrant Accessibility Index			●			●	●				●	
23) Safe Emergency Shelters		●			●	●					●	
24) Non-Discrimination Policies	●	●				●	●				●	
25) Disaster Case Management	●	●	●			●	●				●	●
26) Legal Services			●								●	
27) Mental Health	●	●	●			●			●		●	●
28) Immigration Legal Aid at Shelters	●	●				●		●		●	●	
29) Legal Issue Summaries		●				●		●		●		
30) Potential Litigation			●			●		●			●	
31) Representation to Media		●	●			●		●		●		
32) Representation in Planning	●	●	●			●	●		●		●	
33) COOP Development	●					●	●				●	
34) Cash Assistance			●			●			●		●	
35) Emergency Preparedness	●					●		●			●	

IMMIGRANT PROFILE:

IMMIGRANTS ARE INVALUABLE TO THE HOUSTON REGION, AND IMMIGRANTS ARE DISPROPORTIONATELY IMPACTED BY DISASTERS.

The Greater Houston region is one of the most diverse places in the country. As of 2016, there were 1.6 million foreign-born people in the region, making up 23% of the total population. While an estimated 506,000 (33%) of those are undocumented, many families have "mixed" legal status, meaning that citizens and non-citizens often live in the same household. At least 98,000 undocumented immigrants are married to a U.S. citizen or legal permanent resident. An estimated 15% of children in Houston have at least one unauthorized immigrant parent and 80% of these children are U.S. citizens.[9]

In Houston, The Woodlands, and Sugarland, more than a third of residents older than five years speak a language other than English at home, encompassing an estimated 145 languages. Spanish, Vietnamese, Chinese, Arabic, French, and Hindi are the most spoken languages.[10] Over 50% of foreign-born residents have limited English proficiency, including an estimated 350,000 unauthorized immigrants and 350,000 green-card holders. Almost 40% of foreign-born residents lack a high school diploma.[11]

In 2016, working age immigrants contributed $124.7 billion to the GDP, held $38.2 billion in spending power, and contributed $3.5 billion in state and local taxes.[12] In 2016, 56% of immigrants in Houston owned their homes, as did 41% of unauthorized immigrants. Despite their significant economic contribution, 45% of foreign-born families live under 200% of the poverty line, or $48,500 annual income for a family of four, and 20% of foreign-born families live below the federal poverty line of $24,250 annually for a family of four.[13]

Each year, positive sentiment of the region's residents towards immigrants grows. The number of Harris County residents who favor granting undocumented immigrants a path to citizenship if they speak English and have no criminal

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9 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

10 Lomi Kriel, "Just How Diverse Is Houston? 145 Languages Spoken Here," Houston Chronicle, November 5, 2015, https://www.houstonchronicle.com/news/houston-texas/article/Houstonians-speak-at-least-145-languages-at-home-6613182.php.

11 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

12 "New Americans in Houston: A Snapshot of the Demographic and Economic Contributions of Immigrants in the Metro Area," https://www.newamericaneconomy.org/city/houston/.

13 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

record increased from 75% in 2014 to 82% in 2018. Further, the opinion that immigrants generally contribute more to the American economy than they take rose from 59% in 2014 to 63% in 2018.[14]

Still, pre-existing racial, ethnic, and economic disparities compound disaster recovery. Research has found that "communities suffering from poverty, discrimination, unemployment, safe and adequate housing shortages, homelessness, and other issues even before disaster strikes are susceptible to the worst impact and experience greater difficulty in recovery and reconstruction."[15] This held true through Harvey.

> A December 2017 survey of residents in 24 southeastern Texas counties found immigrants were more likely than U.S.-born respondents to report income of job loss due to the hurricane (64% versus 39%). Although immigrants were less likely to report home damage, those who did experience damage were less likely than U.S.-born to say they had applied for disaster assistance (49% versus 64%) or that they had any type of home or flood insurance (41% versus 55%).
>
> — Bryan Wu ***Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast.*** [16]

Research has long documented that less-privileged residents often suffer losses in economic, social, and cultural resources after disasters, while more-privileged residents tend to recover more quickly and may even benefit financially. In fact, the more aid an area receives from the Federal Emergency Management Agency (FEMA), the more wealth inequality grows as a result of both physical damages and how recovery resources are designed and distributed.[17]

Assistance from both public (FEMA and the National Flood Insurance Program) and private insurers is designed primarily to restore property – wealth – to help re-establish family and community well-being. Therefore those with more property and more income with which to insure it will likely experience significantly different recoveries than those with less. More privileged property owners may gain access to new resources including low-interest loans, payouts from insurance policies, and opportunities to transfer improved properties to adult children. By contrast, for less privileged residents and non-property owners, local damages

14 Stephen L. Klineberg, The 2018 Kinder Houston Area Survey: Tracking Responses to Income Inequalities, Demographic Transformations, and Threatening Storms.

15 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association, accessed February 2019, https://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2014/07/23/17/36/addressing-the-needs-of-immigrants-in-response-to-natural-and-humanmade-disasters-in-the-us.

16 Bryan Wu, Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast.

17 Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," Social Problems, spy016, accessed March 2019, https://doi.org/10.1093/socpro/spy016.

are likely to trigger financial liabilities resulting from an increased likelihood of job loss, having to move, paying higher rents due to reduced housing stock, and dipping into already meager savings to compensate for such expenses. Government recovery programs have even suspended legal protections for low-wage workers to speed recovery and stimulate local economies.[18]

Compared with native-born residents, immigrants in the Texas counties surveyed report more tenuous financial and social circumstances. Seven in 10 say they have few or no people living nearby they can rely on for support.[19] Both real and perceived barriers prevented many immigrants from seeking Hurricane Harvey rescue, response, and recovery assistance outside of their limited trusted networks.

The Federal Emergency Management Agency (FEMA) is a division of the Department of Homeland Security, which is also home to Immigrants and Customs Enforcement (ICE). During and after a disaster, FEMA is the most significant source of recovery assistance. Only "U.S. citizens, non-citizen nationals, and qualified aliens" are eligible for FEMA's Individuals and Households Program (IHP).[20] Undocumented immigrants can receive IHP only through a household member with a Social Security number. A household is "all persons who lived in the pre-disaster residence... who are expected to return during the assistance period."[21] Immigrants not eligible for FEMA assistance include those with "non-immigrant" visas (work, student, travel) and those with temporary status, such as Deferred Action for Childhood Arrival (DACA) or Temporary Protected Status (TPS). [Appendix B].

All FEMA IHP applicants must sign a Declaration and Release Form (O.M.B. No 1660-0002), which requires agreeing to potential information disclosure to ICE: "I understand that the information provided regarding my application for FEMA disaster assistance may be subject to sharing within the Department of Homeland Security (DHS) including, but not limited to, the Bureau of Immigration and Customs Enforcement."[22] This disclosure is a significant disincentive for families with qualified household members to apply for aid.

All FEMA IHP applicants must sign a Declaration and Release Form (O.M.B. No 1660-0002), which requires agreeing to potential information disclosure to ICE.

18 Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," Social Problems, spy016, accessed March 2019, https://doi.org/10.1093/socpro/spy016.

19 Bryan Wu, Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast.

20 "Citizenship/Immigration requirements," Federal Emergency Management Agency, last updated December 2, 2015, https://www.fema.gov/faq-details/FEMA-Citizenship-Immigration-requirements-1370032118159.

21 Individuals and Households Program Unified Guidance, Federal Emergency Management Agency, September 2016, https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf.

22 Form referenced on page 11 of Federal Emergency Management Agency (FEMA), Individuals and Households Program Unified Guidance (UHPUG), FP 104-009-03. Accessed March 5, 2019. Available: https://www.fema.gov/media-library/assets/documents/124228

Citizenship eligibility requirements do not apply to some emergency assistance (search and rescue, medical care, shelter, food and water, and reducing threats to life, property, public health, and safety), disaster legal services, crisis counseling, disaster case management, and disaster food stamps.[23] Other short-term, non-cash emergency assistance – such as Disaster Supplemental Nutrition Assistance Program (D-SNAP) – is also available to undocumented immigrants, though underutilized by mixed status families.[24]

POLITICAL CONTEXT:

MANY IMMIGRANTS HAVE EVIDENCED-BASED MISTRUST OF GOVERNMENT AGENCIES AND POLICIES, WHILE MANY LOCAL RESPONSE AND RECOVERY SYSTEMS BARRIERS TO IMMIGRANTS RECEIVING SERVICES. COUNTY AND CITY GOVERNMENTS MUST MITIGATE FEAR AND ADDRESS BARRIERS TO ENSURE IMMIGRANTS OBTAIN SERVICES.

Houston Immigration Legal Services Collaborative (HILSC) interviewed more than 80 people from 40 organizations and agencies [Appendix C], as well as undocumented immigrants for this Humanitarian Action Plan. We found that the anti-immigrant political climate discouraged many from seeking assistance that they may have been eligible for, a finding which has been corroborated by multiple studies. The Living Hope Wheelchair Association found that fear kept immigrant families from shelters and asking for help in order to prevent interaction with law enforcement or government agencies.[25] In a November 2017 survey of 351 day laborers, nearly two-thirds (64%) who identified as being undocumented indicated that they do not feel safe asking for help from government officials.[26] A December 2017 survey found half of immigrants whose homes were damaged (46%) said they were worried that if they tried to get help in recovering from Hurricane Harvey, they would draw attention to their or a family member's immigration status. [27]

This fear was not unfounded. Overshadowing the chaos of our inundated region were proposed and newly-implemented policies from the Trump administra-

23 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape. See also: https://www.parkviewmc.com/app/files/public/1484/2016-Poverty-Level-Chart.pdf.

24 Bryan Wu, Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast.

25 Pre-Existing Conditions in a Time of Disaster: Challenges and Opportunities Advancing an Equitable Recovery for Vulnerable Populations, Living Hope Wheelchair Association, January 2019, https://lhwassociation.org/sites/default/files/pre-existing_conditions_in_a_time_of_disaster.pdf.

26 Nik Theodore, After the Storm: Houston's Day Labor Markets in the Aftermath of Hurricane Harvey.

27 Liz Hamel, Bryan Wu, Mollyann Brodie, Shao-Chee Sim and Elena Marks, An Early Assessment of Hurricane Harvey's Impact on Vulnerable Texans in the Gulf Coast Region: Their Voices and Priorities to Inform Rebuilding Efforts, The Kaiser Family Foundation and The Episcopal Health Foundation, December 2017, http://www.episcopalhealth.org/files/7315/1240/4311/An_Early_Assessment_of_Hurricane_Harveys_Impact.pdf.

tion to significantly restrict legal immigration, curtail protections for refugees and asylees, and increase immigration enforcement. ICE arrests of noncitizens without criminal records increased 147% between 2016 and 2017 nationally.[28] Locally, the Houston ICE office made 13,500 arrests in 2017, and Harris County has the 4th highest number of ICE "community arrests" in the U.S.[29] The Trump administration has also taken steps to end DACA and TPS designations for those from some countries suffering from natural disasters or civil unrest. Those designations protect an estimated 59,000 people in our region from deportation from their homes.[30]

ICE arrests of noncitizens without criminal records increased 147% between 2016 and 2017 nationally. Locally, the Houston ICE office made 13,500 arrests in 2017, and Harris County has the 4th highest number of ICE "community arrests" in the U.S.

Despite "official" policies of inclusivity, rumors and first-hand experiences spread like wildfire across informal communications channels, such as Facebook. For example, despite the inclusivity policy of the American Red Cross, representatives were reported to have asked people in the streets for Social Security numbers before providing assistance after Harvey.

> At the George R. Brown Convention Center, ICE officers were used for added security, and were documented standing stationed around the immigration legal services assistance table. Though their role was to maintain public safety, their presence inside and visible DHS vehicles outside kept away many who needed shelter from the storm.

Anti-immigrant public policy is being implemented in more subtle ways as well, most notably in proposed changes federal public charge rules. If an immigrant is labeled a "public charge," their eligibility for legal residence is put at risk, and rumors of big changes to this rule were leaked several times in 2017 and 2018. For the first time in history, the U.S. administration is proposing to include the use of Medicaid, food stamps, and Section 8 housing vouchers as grounds for labeling an immigrant as a public charge.

Due to the lack of clarity of the proposed public charge changes, many immigrants forego assistance of both publicly and privately funded assistance, even for their citizen children, at the expense of their health and safety in order to avoid compromising an immigration case – even during disaster recovery, which is technically exempt. The Urban Institute found that foreign-born children had fewer visits to the emergency room than their U.S. counterparts, but their expenditures were more than three times higher, presumably due to limited access to primary care.[31] It expects public charge provisions to exacerbate that. Pediatricians, public health researchers, and child health and policy experts strongly

28 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

29 Syracuse University, TRAC Immigration, "Counties Where ICE Arrests Concentrate." Available: https://trac.syr.edu/immigration/reports/533/

30 DACA was rescinded on September 5, 2017. For more information on each of these policies, see https://www.houstonimmigration.org/immigration-policy/.

31 Sarah Horton, Kristin Yarris, and Whitney Duncan, "Public Charge Provisions Hurt Citizen Children Too," The Hill, December 9, 2018, https://thehill.com/blogs/congress-blog/healthcare/420464-public-charge-provisions-hurt-citizen-children-too.

oppose the changes to public charge rules as they endanger the health and well-being of immigrants and their children. [32]

At the state level, Texas Senate Bill 4 (SB4) was signed by Governor Greg Abbott on May 7, 2017, but was set to go into effect on September 1, 2017, in the midst of Harvey recovery. The anti-immigrant bill makes it nearly impossible for local law enforcement and public institutions to protect the safety of undocumented residents, and threatens police chiefs and sheriffs with jail time for not helping federal immigration officials. Noncompliant cities and counties are threatened with fines of up to $25,000 per day. Some local jurisdictions in Texas, including Houston, joined one of two lawsuits against SB4, but the law was almost entirely upheld by the 5th Circuit in March 2018. ICE justified the need for policies like SB4 as a way to target undocumented individuals accused of "violent crimes, human smuggling, gang/organized crime activity, sexual offenses, narcotics smuggling, and money laundering." However, a 2011 study from the Migration Policy Institute found that about half of immigration detainers used in jurisdictions with such agreements were for people arrested in connection with misdemeanors and traffic violations. [33]

When local law enforcement becomes entangled with ICE to enforce federal immigration laws, public safety and community trust suffer. The University of California found that when undocumented Mexican immigrants were told that local law enforcement worked with ICE, they were 61% less likely to report crimes they witnessed and 43% less likely to report being the victim of a crime, than those who were told that local law enforcement was not working with ICE. [34]

In addition to new anti-immigrant policy and practices, locally the Houston-region has systemic barriers to equitable recovery. Many agencies suspect low-income people of "double-dipping" when seeking aid, so rather than finding paths to assist those in need, many organizations diligently find ways to disqualify them. Unintentional barriers such as requesting Social Security numbers when not required discourage immigrants from even applying. Ultimately, the aid that goes to low-income people to rebuild their homes and lives is miniscule compared to the budget allocated to rebuild infrastructure, businesses, and the more expensive homes of higher-income families. Which is one reason that wealth inequality grows with aid from the Federal Emergency Management Agency (FEMA).[35]

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32 "Children's HealthWatch's Statement Opposing Changes to Public Charge," Children's HealthWatch, September 25, 2018, http://childrenshealthwatch.org/childrens-healthwatchs-statement-opposing-changes-to-public-charge.

33 Laura Muñoz Lopez, "How 287(g) Agreements Harm Public Safety," Center for American Progress, May 8, 2018, https://www.americanprogress.org/issues/immigration/news/2018/05/08/450439/287g-agreements-harm-public-safety.

34 Laura Muñoz Lopez, "How 287(g) Agreements Harm Public Safety."

35 Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," Social Problems, spy016, accessed March 2019, https://doi.org/10.1093/socpro/spy016.

Numerous elements contribute to the complexity of connecting immigrants with services through disaster response and recovery. To retain public health and safety of our region, Harris County and the City of Houston must understand and mitigate the impact of federal and state rules that create barriers to immigrants accessing disaster assistance. Mayor Turner's Welcoming Houston commitments are one step towards this.[36] Our continued Harvey recovery offers us the opportunity to build systems that support equitable recovery and build trust in local government. This trust in turn contributes to use of public services and thereby increases public health and safety.

BACKGROUND:

MANY IMMIGRANTS HAVE EVIDENCED-BASED MISTRUST OF GOVERNMENT AGENCIES AND POLICIES, WHILE MANY LOCAL RESPONSE AND RECOVERY SYSTEMS BARRIERS TO IMMIGRANTS RECEIVING SERVICES. COUNTY AND CITY GOVERNMENTS MUST MITIGATE FEAR AND ADDRESS BARRIERS TO ENSURE IMMIGRANTS OBTAIN SERVICES.

Houston Immigration Legal Services Collaborative (HILSC) is a member-driven network of more than 40 immigrant-serving organizations that provide resources to low-income immigrants. Stakeholders include non-profit legal services providers, advocacy organizations, the business community, university legal clinics, public agencies, and private foundations. HILSC serves these organizations, with the vision that no immigrant in the Greater Houston region goes without legal assistance while seeking legal status and navigating the complexities of the U.S. immigration and local social service systems.

Before Hurricane Harvey hit Houston in August 2017, HILSC did not imagine a role in disaster response and recovery, nor did most of our member organizations. Within 24 hours however, HILSC partners inundated the HILSC listserv, which is used by 400 non-profit staff and attorneys that serve immigrants, with detailed questions from clients such as:

- My home is flooding, but I am an asylum seeker with an ankle monitor. Can I leave?
- Is it safe for me to go to a shelter if I am undocumented?
- I have a loved one detained, but have lost communication because of the flood. How can I find out if they've been transferred or deported?
- How can I find out if my immigration court appointment will be rescheduled especially since I don't know where I'm going to be living? Will I be deported if I miss a court date?
- I lost my green card when my home flooded...what do I do, especially if I'm pulled over by police?

Listserv participants shared information and learnings, and HILSC staff filled in gaps. HILSC compiled a list of these Frequently Asked Questions (FAQ) [Appendix D], researched and provided answers, and shared the information widely with service providers.

These questions highlighted the need for immigration lawyers at local shelters. While Lone Star Legal Aid provided disaster expertise, Houston Volunteer Lawyers turned out their broad network of volunteer attorneys, and HILSC recruited immigration attorneys. Beyond answering questions, volunteers advocated for mixed-status families to FEMA and asked ICE officers at the George R. Brown shelter to move away from the legal table to ensure no one feared approaching.

36 Accessible at www.welcominghouston.org.

The FAQ was also shared through HILSC's Immigrant Rights Hotline (833-HOU-IMMI), which was advertised on Univision and Telemundo. For two days, August 31 and September 1, hotline calls went to the Univision phone bank, and volunteers from HILSC partner agencies including United We Dream, ACLU, BakerRipley, Catholic Charities, Tahirih Justice Center, Bonding Against Adversity, TCCS, and others responded to 1,393 calls with quality, timely, and actionable information.

Low-income disaster survivors often face significantly more severe losses and significant obstacles in their path to recovery than middle- and upper-income people.[37] As Harvey's waters receded, HILSC and our partners focused on how to better serve the region's low-income immigrants. We responded in a number of ways including:

- **Social Services Advocacy** – HILSC began engaging in organizational advocacy and providing expertise to break down institutional barriers to serving immigrants.
- **Availability of federal and state disaster relief for immigrants** – The Penn State Dickinson Law Medical Legal Partnership Clinic conducted pro bono research documenting which types of disaster-related public assistance immigrants of various legal statuses are eligible for.
- **NeedHOU.org** – HILSC developed a social service database of safe, secure services verified and maintained by our Access to Services workgroup.
- **Harvey Assistance for Immigrants** – HILSC raised and distributed $200,000 in direct cash assistance to immigrants via grants to immigrant-serving organizations.
- **Disaster Recovery Legal Corps Immigration Fellows** – HILSC raised funding for four immigration legal fellows to join Equal Justice Works' City of Houston cohort of lawyers delivering legal and recovery assistance to people impacted by Hurricane Harvey.
- **State Bar of Texas' Disaster Relief Legal Manual** – HILSC provided the base research for and edited a new chapter dedicated to immigrant-specific issues in the Bar's "Resource Materials for Responding to Legal Questions from Those Affected by Disasters."
- **Humanitarian Action Plan** – HILSC crafted this coordinated emergency management plan to improve preparedness, response, and recovery services to increase resiliency of immigrants and our region.

Subsequent projects include creating the Immigrant Accessibility Index [Appendix F], which helps organizations assess their program's accessibility to immigrants, particularly those who are undocumented. Participating organizations can consult HILSC to identify best practices to fill gaps and reduce barriers for immigrants who need access to legal and social services. HILSC also created a template organizational policy to respond to ICE requests for information or access.

Simultaneously HILSC developed cultural competency training, which has been implemented with 100 front line staff of Harris Health's Financial Assistance Program. The program serves nearly 100,000 people annually, about 40% of whom are non-citizens and 46% of whom are non-English speaking. The recommendations below include expanding cultural competency training to additional programs.

37 "Disaster Task Force," Legal Services Corporation, accessed February 2019, https://www.lsc.gov/disaster-task-force.

METHODOLOGY:

THE HUMANITARIAN ACTION PLAN'S RECOMMENDATIONS ARE SYSTEMATICALLY INFORMED AND MEANINGFUL TO OUR REGION.

The Humanitarian Action Plan (HAP) is a coordinated emergency management plan to increase immigrant resilience, contribute to a more efficient and effective disaster response and recovery, and improve the health and safety of all through future disasters.

Goals

- To help immigrant-serving organizations be prepared to best serve their clients through disasters.
- To promote coordination among immigrant-serving organizations and disaster agencies in disaster planning for preparedness, response, and recovery.
- To provide informed recommendations for systems-level agencies (primarily policy-makers, very large regional and national nonprofits, and funders) to integrate into their strategic emergency management plans and implement to increase our region's resilience.

Houston Immigration Legal Services Collaborative (HILSC) set out to identify best practices, gaps and barriers in Hurricane Harvey response and recovery [Appendix G] to inform HAP recommendations. HILSC conducted: over 80 interviews with directors, managers and service providers from over 40 immigrant serving organizations [Appendix C]; two focus groups with immigrant advocates; and a focus group with undocumented immigrant clients. We then met with 11 systems-level agencies.

Three primary opportunities emerged to increase immigrant resilience to disasters:On September 26, 2018, HILSC convened more than 30 people to workshop preliminary recommendations based on interview findings, identify missing key actions, and discuss implementation. Participants told us this was the first time that disaster and immigration experts had been called on to actively work together on disaster response planning.

1 Inclusive Communication

Accurate, timely, and actionable information must be provided to immigrants in accessible language to increase the efficiency of response and recovery, reduce rumors, and help them connect with resources.

2 Accessible resources

Preparedness, response, and recovery assistance – particularly privately-funded aid – must be available, accessible, and understandable to all immigrants.

3 Culturally competent approaches

All who play a role in emergency management must understand and address the core needs of immigrants and strategically design policies, services and materials to meet those needs.

Systems-level

American Red Cross, Recovery

City of Houston Housing and Community Development Dept

City of Houston Office of Emergency Management

City of Houston Office of New Americans and Immigrant Communities

Federal Emergency Management Agency (FEMA)

Greater Houston Community Foundation

Harris County Office of Homeland Security and Emergency Management

Harris County Public Health

Houston Advanced Research Center

City of Houston Health Department

United Way

This report presents 35 recommendations, including nine HILSC is committed to acting on, organized by broad categories, based on when they happen, at what level, and the approach and timing for implementation:

- Disaster phase – Preparedness actions improve the chance for successfully dealing with an emergency; a responsible and safe Response during an emergency saves lives and property; Recovery includes temporary and long-term measures to return to a safe and healthy life. Some recommendations are planned for in preparedness but implemented during response, so are labeled for both phases.
- Implementation Level – Federal/State, County/City and Nonprofit are the levels at which recommendations must be implemented.
- Implementation Approach – Policy relates to needed changes in laws, rules, or regulations with broad-reaching impact; Program/Operations is related to changes within or the addition of new programs and/or how an organization operates; and Funding is where additional budget is needed to address a gap or barrier.
- Opportunity for increased immigrant resilience – Inclusive communication, Accessible resources, and Cultural competency are the themes that emerged from interviews and are described above

We've also identified timing and proposed implementers, most of whom have – as of the writing of this plan – been briefed on the recommendations and given feedback. Recommendations have been refined throughout the process, and were presented to our original group of interviewees in a November 27, 2018, webinar.

RECOMMENDATIONS AND RATIONALE:

COORDINATED DISASTER PREPARATION, RESPONSE AND RECOVERY PLANNING TO INCREASE IMMIGRANT RESILIENCE.

1) Federal Enforcement

Suspend immigration enforcement within 200 miles of disaster zones, including operations at Customs and Border Patrol check points, to ensure that people can move safely for evacuation and re-entry, to access resources, and to reach recovery job sites.

Proposed implementers: U.S. Department of Homeland Security
Disaster phase: Response
Level: Federal/State
Approach: Policy
Opportunity: Accessible resources

Rationale: When a government declares a State of Emergency, it suspends normal operations to gain control of the crisis. Immigration enforcement should be suspended as well. In disaster response and recovery, day laborers comprise a key component of the "second responder" force for the demanding and often dangerous work of debris removal, demolition, and repair and rebuilding of residential and commercial properties. [38]

On Friday, August 25, 2017, U.S. Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) released an announcement stating, "Routine non-criminal immigration enforcement operations will not be conducted at evacuation sites, or assistance centers such as shelters or food banks."[39] The agencies also said they would prioritize "lifesaving and life-sustaining activities" during the storm and its aftermath.[40] They did not, however, suspend check point operations, causing many immigrants of mixed-status families to shelter in place regardless of danger.

Suspending check point operations is not unprecedented. During Hurricane Matthew in 2016, CBP and ICE announced that their highest priority was "to promote life-saving and life-sustaining activities, the safe evacuation of people who are leaving the impacted area, the maintenance of public order, the prevention of the loss of property to the extent possible, and the speedy recovery of the region."[41]

Further, their announcement stated, "No immigration enforcement initiatives associated with evacuations or sheltering related to Matthew, including the use of checkpoints for immigration enforcement purposes in impacted areas during an evacuation."[42] Public safety should be the highest priority.

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38 Nik Theodore, After the Storm: Houston's Day Labor Markets in the Aftermath of Hurricane Harvey.

39 Sarah Birnbaum, Alex Newman, and Angilee Shah, "A Looming Immigration Law is Hurting Houston's Ability to Help Undocumented Residents in Wake of Harvey," Public Radio International, August 29, 2017, https://www.pri.org/stories/2017-08-29/looming-immigration-law-hurting-houston-s-ability-help-undocumented-residents.

40 Maria Sacchetti, "For Houston's Many Undocumented Immigrants, Storm is Just the Latest Challenge," Washington Post, August 28, 2017, https://www.washingtonpost.com/local/immigration/for-houstons-many-undocumented-immigrants-storm-is-just-the-latest-challenge.

41 "ICE-CBP Joint Message Regarding Hurricane Matthew," Department of Homeland Security, October 26, 2016, https://www.dhs.gov/news/2016/10/06/ice-cbp-joint-message-regarding-hurricane-matthew.

42 Joel Rose, "Border Patrol Says Checkpoints Will Remain Open During Hurricane Harvey," NPR, August 25, 2017, https://www.npr.org/2017/08/25/546109886/border-patrol-says-checkpoints-will-remain-open-during-hurricane-harvey.

2) FEMA Applications

Provide clear communication on the FEMA disaster assistance application process, including how to efficiently work through the process, where to access assistance, and organizational training, to increase recovery assistance to eligible disaster victims.

Proposed implementers: Federal Emergency Management Agency (FEMA)
Disaster phase: Preparedness, Recovery
Level: Federal/State
Approach: Program/Operations
Opportunity: Accessible resources

Rationale: After Harvey, there was wide-spread frustration and confusion with the Federal Emergency Management Agency (FEMA) application process, particularly related to the commonality of denials. What many people learned, however, is that FEMA considers denials and appeals a normal part of the process. According to a FEMA press release, "Receiving a 'denial' letter from FEMA does not necessarily mean an applicant is not eligible for disaster aid, even when the letter states 'ineligible'. It can be an indication that further information is needed. 'Ineligible' often means 'reconsider'."[43] No wonder people are confused.

To ensure that disaster victims receive the recovery assistance they are eligible for, FEMA must provide clear communication on the full application and appeal process, including providing a resource list of where to locally get help through Disaster Recovery Centers, organizations providing case management, and legal services. FEMA must also train organizations providing these services to increase the efficiency of the case management process and successful applications.

One HILSC interviewee said, "Undocumented people with citizen children were getting kicked out of FEMA early in the process. We had family lawyers doing appeals and winning many. So we used media to educate people to head off potential problems in the future." Given that FEMA is provided via tax payers, the application process must be transparent and not require service agencies to figure out how it works and educate the applicants.

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3) Complete Data

Develop data to accurately understand the impact of a disaster on vulnerable populations, including immigrants, and coordinate public and private recovery resources to ensure private resources reach those who are not eligible for FEMA and other federal assistance.

Proposed implementers: Texas General Land Office, Harris County and City of Houston agencies, academic institutions, and funding agencies
Disaster phase: Preparedness, Response, Recovery
Level: Federal/State, County/City, Nonprofit
Approach: Funding
Opportunity: Accessible resources

> Data currently being used to assess need in Harvey recovery – including from FEMA, American Community Survey, and Civis Analytics – undercounts vulnerable populations. Accurate data is required to understand the impact of a disaster on immigrants and their recovery needs.

Rationale: Undocumented immigrants are eligible for non-cash emergency disaster relief and housing recovery assistance from Housing and Urban Development (HUD) – except residents of Harris County outside the City of Houston. However, they are not eligible for cash benefits or assistance from many government-funded programs such as Federal Emergency Management Agency (FEMA) recovery assistance, which requires at least one legal resident in the household.

43 "FEMA Denial Letters: Not Always the Final Word," Federal Emergency Management Agency, November 18, 2011, https://www.fema.gov/news-release/2011/11/18/fema-denial-letters-not-always-final-word.

An estimated 15% of children in Houston had at least one unauthorized immigrant parent, and 80% of these children are U.S. citizens.[44] But many mixed-status households are reluctant to apply for government assistance out of fear of risking deportation or "public charge" consequences that compromise future efforts to secure permanent legal status.[45] As a result, FEMA Individual Assistance data, on which many recovery funding decisions are based, misses many immigrant households. [46]

Houston's Housing and Community Development Department contracted Civis Analytics to reconstruct Harvey flooding to develop more precise impact data on which to build their plan to distribute HUD Community Development Block Grant (CDBG) housing recovery funds. The report estimated that nearly half of 208,000 households affected by Harvey are low- or moderate-income, incurring about $5.2 billion in damages. The report acknowledges, however, that because the methodology uses American Community Survey data, it likely underestimates populations that are "hard-to-count," such as undocumented immigrants, people who are "doubled-up" or sharing residences, and people who are "unhoused". [47]

In order to ensure an equitable recovery, it is essential to have an accurate account of those who are impacted, and that the data is used to inform the allocation of resources. Both the Migration Policy Institute in Washington, D.C. and the Center for Migration Studies in New York have proven formulas to include immigrants in data results that can be learned from to develop local impact data. Academicians are adept partners in this pursuit. Such information will allow public money to be used where it can be, and private money coordinated to fill the gaps.

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4) Informed Decisions

Inform policy and funding decisions with: 1- existing studies which document immigrants' experience in Harvey response and recovery and 2- immigrant-serving organizations' expertise, in order to fill gaps and address unintentional barriers to emergency and recovery services for immigrants.

Proposed implementers: Harris County and City of Houston agencies
Disaster phase: Preparedness
Level: County/City, Nonprofits
Approach: Policy, Funding
Opportunity: Accessible resources

Rationale: Additional data is needed to understand the full impact of any disaster on our total population and ensure an equitable recovery. However, many researchers and agencies have gathered and reported data on Harvey's impact on immigrants, including in this HAP and many sources we cite. Our learnings and recommendations must be understood by policy and funding agencies, should inform any planned studies and surveys, and must be incorporated into policy and funding decisions.

We know that partnership between government and nongovernmental organizations leads to more effective response and recovery. In fact, United States federal agencies that oversee and fund local emergency management require grantees to include communities in emergency planning and response. [48]

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44 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

45 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

46 Housing Recovery After Hurricane Harvey, Houston's Housing and Community Development Department's Local Action Plan, June 2018, https://houstontx.gov/housing/Local%20Action%20Plan%20Summary%20V-5.pdf.

47 "City of Houston Local Housing Needs Assessment: Hurricane Harvey Housing Recovery," accessed February 2019, http://houstontx.gov/housing/Draft_Local_Housing_Needs_Assessment_v2.pdf.

48 Anita Chandra, Malcolm Williams, Alonzo Plough, Alix Stayton, Kenneth B. Wells, Mariana Horta, and Jennifer Tang, "Getting Actionable About Community Resilience: The Los Angeles County Community Disaster Resilience Project," American Journal of Public Health, February 3, 2013, https://ajph.aphapublications.org/doi/full/10.2105/AJPH.2013.301270.

5) Organizational Barriers

Assess organizational policies and practices to identify and remedy unintentional barriers to immigrant access to secure services. Such actions include strengthening inclusivity statements and similar policies as well as all ensuring all staff and volunteers practice inclusion.

Proposed implementers: All public and private emergency service providers
Disaster phase: Preparedness
Level: County/City, Nonprofit
Approach: Policy
Opportunity: Accessible resources

Rationale: The American Red Cross' inclusivity statement "ensures inclusion of all diverse communities in its shelter operations." While many agencies and organizations echo this inclusivity in their own vision, missions, and goals, such statements must be strengthened and put into practice.

To build trust with immigrant communities, policies must guarantee that agencies will not release client-level data to government agencies. Disaster recovery research recommends "organizations and entities providing direct services to disaster survivors protect the confidentiality of immigrants whom they serve by specifying confidentiality requirements in service contracts and prohibiting information provided in the process of applying for disaster relief from being shared with the Bureau of Immigration and Customs Enforcement."[49]

Further, practices need to be examined to eradicate unintentional barriers. HILSC has an organizational self-assessment tool called the Immigrant Accessibility Index [Appendix F], which we use to identify opportunities to reduce barriers. An example of such a barrier comes from the intake form at the emergency shelter at the George R. Brown Convention Center, which reportedly asked for a Social Security number. Though it is not required, asking the question forces those without citizenship to state they do not have a Social Security number, which is then on record by omission. When BakerRipley opened the emergency shelter at NRG Stadium, they examined intake forms and removed such barriers. These two messages were communicated among informal channels such that HILSC partner organizations felt confident sending clients who needed shelter to NRG. Such knowledge and simple actions reduce barriers to service for all Houston-area residents.

6) Chemical Response Plan

Develop and implement a regional chemical response plan, guided by recommendations from the Environmental Integrity Project's August 2018 report to ensure minimal damage to ship channel industries and affected residents, the workforce and first responders in their proximity and throughout the region.[50]

Proposed implementers: Harris County Office of Homeland Security and Emergency Management, and Harris County Public Health, in consultation with governments of cities within the county and local environmental justice advocates including Tejas
Disaster phase: Response
Level: County/City
Approach: Policy
Opportunity: Cultural competence

49 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

50 Preparing for the Next Storm: Learning from the Man-Made Environmental Disasters That Followed Hurricane Harvey, Environmental Integrity Project, August 16, 2018, http://www.environmentalintegrity.org/wp-content/uploads/2018/08/Hurricane-Harvey-Report-Final.pdf.

Rationale: Texas Governor Greg Abbott declared a "State of Disaster," on August 23, 2017. In the Houston region however, industries waited more than three days before shutting down, which triggered the release of 8.3 million pounds of unpermitted air pollution. Much of this was caused by flooding-driven emergencies, equipment failures, and electrical outages. These numbers are likely underestimated as they are self-reported by industry. To avoid damage, 75% of air monitors were shut down in advance of Hurricane Harvey.

The release included volatile organic compounds and benzene, a cancer-causing chemical that can cause rapid heart rates, tremors, and vomiting even with short-term exposure. During the storm, state and federal officials provided broad statements about pollution levels, repeatedly reassuring people they had no reason to worry. The state's decision to suspend pollution monitoring requirements has made it difficult to assess health effects.[51]

Moving east along Buffalo Bayou and through the ship channel, the percentage of foreign-born adults is as high as 49% in Downtown and East End Houston, to 40% in the Channelview/Cloverleaf area and Pasadena/South Houston, to 29% where the channel opens up through Baytown and La Porte to Trinity Bay towards the Gulf of Mexico.[52] The "fenceline" zones within three miles of hazardous chemical facilities suffer a greater risk of cancer and respiratory illness from air pollution.[53] The large-scale pollution during Harvey could have been avoided if refineries and chemical plants on the ship channel had shutdown sooner, as happened in other areas of the Texas Gulf Coast. A regional chemical response plan is necessary to protect public health and safety.

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7) Safe, Affordable Housing

Protect low-income homeowners and renters and the neighborhoods they live in by 1) increasing affordable housing supply, 2) improving and enforcing building safety codes, and 3) expanding and/or clarifying acceptable forms of identification required for disaster recovery applications.
Proposed implementers: Harris County and City of Houston housing agencies and departments
Disaster phase: Preparedness and Recovery
Level: County/City
Approach: Policy
Opportunity: Accessible resources

Rationale: Before Harvey, Houston was the third worst city in the country when it came to the availability of affordable housing for extremely low-income households.[54] After Harvey, residents are even more likely to be trapped in dangerous housing without access to a safe alternative.

As of 2016, the homeownership rate in Houston for green-card holders was 49%, and for unauthorized immigrants 41%, despite generally lower income levels of many unauthorized immigrants.[55] More than half of immigrants live in rental housing, which are overseen by weak policies and enforcement. The city's Multi-Family Habitability Code meets only 24% of public health protections recommended by experts. Further, the division that enforces the code does not inspect the units' interiors during its inspections and therefore cannot identify and address major health and safety issues inside apartments.[56] Pew Trusts found a $4-to-$1 benefit when building construction exceeds the International Code Council's

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51 "Industry's Delay in Plant Shutdowns Worsened Air Pollution During Hurricane Harvey," Environmental Integrity Project, August 16, 2018, https://www.environmentalintegrity.org/news/industrys-delay-in-plant-shutdowns-worsened-air-pollution-during-hurricane-harvey/.

52 "Area Profile," UTHealth, accessed February 2019, https://hhs2010.sph.uth.tmc.edu/AreaProfileReport/.

53 "Life at the Fenceline," Environmental Justice for All, accessed February 2019, https://ej4all.org/life-at-the-fenceline.

54 Heather K. Way and Carol Fraser, "Out of Order: Houston's Dangerous Apartment Epidemic," University of Texas School of Law, Entrepreneurship and Community Development Clinic, January 2018, https://law.utexas.edu/wp-content/uploads/sites/11/2018/02/2018-02-ECDC-ExecSum-HoustonApartments.pdf.

55 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

56 Heather K. Way, "Out of Order: Houston's Dangerous Apartment Epidemic."

(ICC) 2015 model building codes. While the codes provide significant safety, even more money can be saved building beyond codes. Such investments in "code-plus" mitigation include elevating a home above the level required by the ICC to reduce flood risk.[57]

There have also been reports of abuses of unauthorized immigrants by landlords since Harvey damaged almost 43,000 apartment units, including failure to repair hurricane damage or forced eviction.[58] Low-income and other vulnerable people are also more susceptible to scams and price gouging, which affects renters as well as homeowners.[59]

As of 2016, 56% of all immigrants in the Houston area lived in owned homes, not far behind the rate of 65% for the U.S.-born population.[60] Undocumented homeowners impacted by Harvey are eligible for multiple disaster assistance streams [Appendix B] but this is not always clear. Applications must be clear and inclusive.

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8) Labor Protections

Partner with local worker centers to ensure the health and safety of second responders who are cleaning and rebuilding our region, and reduce violations of employment laws.

Proposed implementers: Harris County and City of Houston agencies, local worker centers and unions, and funders
Disaster phase: Preparedness, Recovery
Level: County/City, Nonprofit
Approach: Policy
Opportunity: Accessible resources

Rationale: A November 2017 study from the University of Illinois at Chicago found that the health and safety of day laborers serving the community as "seconder responders" after Harvey were extremely compromised. Eighty-five percent of the 351 day-laborers surveyed reported they had not received training regarding the hazards of their worksites. Most of these "second responders" never received training on the risks related to unsafe buildings, mold, working in contaminated water, and working around fallen trees or electrical lines.

More than a third of workers reported having been injured while employed as a day laborer. Of those, 67% indicated the injury was due to an unsafe workplace, 63% were due to lack of protective equipment, and 52% were injured after being pressured to work faster. Texas is the only state in the country that does not have mandatory workers' compensation insurance laws to protect workers.

According to the Department of Labor, all workers in the United States have a right to be paid for time worked regardless of immigration status.[61] Yet, wage theft was rampant in Houston following Hurricane Harvey. In just the first month, 26% of day laborers were victims of wage theft and the Fe y Justicia Worker Center has documented over $1.2 million in wage theft claims in the last year, at about $3600 per case. For minimum wage workers, this is 25% of their annual take home pay.[62] There is little recourse for this injustice without the assistance of a worker center and pro bono labor attorneys, which are in short supply in Houston .

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57 Laura Lightbody, "Every $1 Invested in Disaster Mitigation Saves $6 Spending to Reduce Risk Saves Lives and Creates Jobs, Key Study Finds," PEW Charitable Trusts, January 11, 2018, https://www.pewtrusts.org/en/research-and-analysis/articles/2018/01/11/every-$1-invested-in-disaster-mitigation-saves-$6.

58 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

59 "Disaster Task Force," Legal Services Corporation.

60 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

61 "Learn About Workers' Issues & Empower Yourself," Fe y Justicia Worker Center, accessed February 2019, https://www.houstonworkers.org/learn.

62 "More Than $12 Million Stolen from Houston Workers in the Last Year," Fey y Justicia Worker Center, published March 1, 2019. www.houstonworkers.org/blog/more-than-1-2-million-stolen-from-houston-workers-in-the-last-year/

A Service Employees International Union (SEIU) campaign in Houston brought 45 complaints to the city, of which wage theft from five companies was discovered in 41 of the cases. Only one company settled its debts. The City of Houston adopted a wage theft ordinance in 2013,[63] but as of June 2018 there had been no consequences for any employer. The city also doesn't hold contractors accountable for theft by their subcontractors, and subcontractors often fold to avoid claims only to reopen later under a new name. The Texas Workforce Commission has limited efficacy as well, with just over 2% of its budget dedicated to labor law enforcement. [64]

In some cases government recovery programs have even suspended legal protections for low-wage workers to speed recovery and stimulate local economies. After Hurricane Katrina, the federal government directed billions of dollars of aid to the Gulf Coast as it simultaneously suspended wage regulations, worker safety laws, and affirmative action considerations for businesses receiving federal contracts. The polarizing effects of these initiatives were compounded by federally funded contracts that paid good money to businesses that then sub-contracted the actual work to companies that paid comparatively lower wages, often to undocumented migrants who were sometimes victims of wage theft, or lack of payment for their labor. [65]

Given that the Houston region depends on day laborers to recover from disasters, we must ensure that their legal rights are protected by pushing for policies that protect workers from wage theft and abuse, and by supporting and increasing capacity of our worker centers, which are trusted sources of information for many undocumented workers.

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9) Immigrants with Disabilities

Ensure the response and recovery needs of immigrants with disabilities are met, guided by Living Hope Wheelchair Association's report, Pre-existing Conditions in a Time of Disasters: Challenges and Opportunities Advancing an Equitable Recovery for Vulnerable Populations.[66]

Proposed implementers: Harris County and City of Houston agencies, and emergency response and recovery providers
Disaster phase: Response
Level: County/City, Nonprofit
Approach: Policy
Opportunity: Accessible resources

Rationale: Immigrants are one of the most vulnerable populations to the damaging effects of disasters on health, income, and quality of life. Immigrants with disabilities are even more vulnerable because of their limited mobility, modes of transportation, and requirements for dignified housing.

Living Hope Wheelchair Association was founded by people with spinal cord injuries to help those with spinal cord injuries and other disabilities lead full and productive lives. The majority of members are not entitled to benefits, lack medical insurance, and have no stable source of income. Members have learned to improve quality of life through hope and solidarity, sharing available resources, and organizing to meet needs.[67]

Living Hope Wheelchair Association conducted a community assessment to record the Harvey experience of immigrants with disabilities. Their report documented the need for policy planning that starts with considerations for the most

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63 "Finance Department: Wage Theft," City of Houston, accessed February 2019. https://www.houstontx.gov/finance/wage_theft.html.

64 Gus Bova, "Wage Wars," Texas Observer, June 13, 2018, https://www.texasobserver.org/wage-wars.

65 Junia Howell and James R Elliott, "Damages Done: The Longitudinal Impacts of Natural Hazards on Wealth Inequality in the United States," Social Problems, spy016, accessed March 2019, https://doi.org/10.1093/socpro/spy016.

66 "Pre-Existing Conditions in a Time of Disaster: Challenges and Opportunities Advancing an Equitable Recovery for Vulnerable Populations," Living Hope Wheelchair Association.

67 "About us," Living Hope Wheelchair Association, accessed February 2019, https://lhwassociation.org/about-us.

vulnerable populations and grows outward from there. Recommendations include geographically diverse relief centers, bringing grassroots organizations to the planning table, and including immigrants and people with disabilities in cultural competency and inclusion trainings. The report asks for survivor-informed planning, with disaster victims providing input rather than feedback in emergency planning. Ultimately Living Hope Wheelchair Association calls for treating all with dignity when it comes to planning for services and trusting people will share their experiences with integrity.

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10) Preparedness Literacy

Develop disaster preparedness information in the top six languages spoken in the Houston area, at a sixth-grade reading level in order to increase access to information and improve the security of all.

Proposed implementers: Harris County Office of Homeland Security and Emergency Management and City of Houston Office of Emergency Management

Disaster phase: Preparedness

Level: County/City

Approach: Program/Operations

Opportunity: Accessible resources

Rationale: There are low levels of English fluency among undocumented and permanent immigrant residents. Over 50% of foreign-born residents have limited English proficiency, including an estimated 340,000 unauthorized immigrants and 350,000 green-card holders. Almost 40% of foreign-born residents lack a high school diploma.[68] These residents face language and literacy barriers that need to be accommodated to ensure successful disaster preparedness, response, and recovery.

The City of Houston provides an extensive Disaster Preparedness Guide, based on Federal Emergency Management Agency materials and available in the top six languages spoken in Houston: English, Spanish, Vietnamese, Chinese, Arabic, and French. Harris County preparedness information is available in English, and some key documents are available in Spanish. It is shared with partners, public, non-profits and community groups from across the region. Representatives also share information at community-organized events, and the material is available on the web.[69] This material does not, however, serve low-literacy people.

Research has found that a mismatch between the literacy levels of existing materials and the skills of many adults limits their ability to understand and effectively use potentially life-saving preparedness information. Disaster preparedness literacy is a somewhat new field, but best practices are being gleaned from health literacy. Materials for vulnerable populations must use of clear, direct, and consistent messages. Best practices include short paragraphs with ample white space, and other techniques to reduce cognitive demands. Materials must also be tested for efficacy to ensure information is clear and actionable by the intended audience. [70]

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11) Continuations of Operations Plan (COOP) Training

Provide Continuation of Operations Plan (COOP) training to immigrant-serving organizations to ensure these expert, trusted agencies have an emergency management plan in place and are therefore available for response and recovery.

Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and City of Houston Office of New Americans and Immigrant Communities

Disaster phase: Preparedness

68 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

69 www.readyhoustontx.gov/prepare-today/make-a-plan/ and https://www.readyharris.org – see Preparedness Quick Links.

70 Lisa Mary Brown, Lindsay J. Peterson, and Jolie Haun. "A Proposed Disaster Literacy Model," June 2014, https://www.researchgate.net/publication/263147331_A_Proposed_Disaster_Literacy_Model.

Level: City/County
Approach: Program/Operations
Opportunity: Accessible resources

Rationale: Government agencies recognize they are generally not widely trusted by the immigrant population, particularly in the current political climate. They are, however, the most significant source of information about disaster preparedness, response, and recovery. As a result, their support of immigrant-serving organizations in creating a Continuity of Operations Plan (COOP) will ensure that trusted organizations are available as a liaison for communication and resources from the government through to Houston's immigrants.

COOP is a federal initiative to encourage people and departments to plan how critical operations will continue throughout an emergency. COOP is a good business practice as it establishes policy and guidance to ensure that primary functions essential to an organization's mission can continue through and after emergencies.[71] [72]

The City of Houston's Office of Emergency Management has committed to provide workshops led by their experienced trainers to help HILSC partner organizations develop their own COOP.

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12) Information Dissemination
Coordinate with immigrant advocates on immigrant-specific disaster information and disseminate to local media to increase access to accurate, timely, and actionable information.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, City of Houston Office of New Americans and Immigrant Communities, and Texas Organizing Project
Disaster phase: Preparedness, Response
Level: County/City
Approach: Policy
Opportunity: Inclusive communication

Rationale: Throughout HILSC's HAP interviews, advocates repeatedly reported that their immigrant clients often lacked information in emergencies. Topics of need include how to get response assistance, health and safety, repair and rebuilding, and mental health support.

Given the long-term impacts of disasters, a comprehensive media campaign should be developed and shared with non-English and culture-specific media outlets. The campaign should also include the Consulate General of Mexico in Houston, which is coordinating a communication strategy to reach the Mexican community, which is the largest country of origin for immigrants in Houston.[73] This effort can begin with convening media representatives and advocates to identify established sources of high-quality information and develop communications protocols.

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13) Immigrant-Specific Information
Provide the HILSC FAQ to first responders and frontline volunteers, shelters, and relief centers to increase access to accurate, timely, and actionable information and assistance for all.

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71 "Continuity of Operations: An Overview," Federal Emergency Management Agency, accessed February 2019, https://www.fema.gov/pdf/about/org/ncp/coop_brochure.pdf.

72 "Continuity of Operations Planning," Boston University Emergency Management, accessed February 2019, https://www.bu.edu/emd/emergency-planning/coop.

73 Randy Capps, A Profile of Houston's Diverse Immigrant Population in a Rapidly Changing Policy Landscape.

Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, City of Houston Office of New Americans and Immigrant Communities, the American Red Cross, and emergency shelter managers
Disaster phase: Response
Level: Federal/State, County, City, Nonprofit
Approach: Policy
Opportunity: Inclusive communication

Rationale: A number of important questions specific to immigrants arise during an emergency, including: rescheduling immigration court dates, the safety of shelters, and eligibility for assistance. The answers to the questions can make a huge difference in someone's exposure to deportation, but providing the answers can take immigration legal experts some research. Immigrants typically do not have access to accurate information about the services and benefits available to them or how their legal status affects their eligibility.[74]

HILSC vets immigrant-specific information and makes it available through our FAQ [Appendix D] and Immigrant Rights Hotline (888-HOU-IMMI). Immigrants seeking assistance will benefit from this research if first responders and frontline staff and volunteers in shelters and at agencies throughout the city are aware of these resources so they can answer immigrant-specific questions.

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14) Automatic Emergency Notification
Develop an automatic registration system for emergency notifications (e.g., through the Harris Health Financial Assistance Program, Houston Public Library, 211 Helpline, and/or others), to increase access to accurate information for all.
Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and potentially Harris Health, Houston Public Library, United Way, and/or other organizations
Disaster phase: Preparedness
Level: County/City
Approach: Policy
Opportunity: Inclusive communication

Rationale: Greater Houston emergency managers recognize the value of emergency notification systems. Three are currently available in the area:

1. The Wireless Emergency Alerts system sends alerts, including National Weather Service alerts and Amber Alerts, to cell phones. This is regulated by the Federal Communications Commission in partnership with the wireless industry. Cell phone users are automatically registered.
2. AlertHouston delivers critical information to Houston residents regarding current conditions, expected impacts, and protective actions to stay safe in an emergency. Residents register for alerts by email, text message, voice call, or mobile app push notification. Alerts are geo-targeted, and subscribers can register up to five physical addresses per contact record to track emergencies in areas with friends and family. Users must subscribe.
3 Greater Harris County 9-1-1 Emergency Notification System issues notifications for neighborhood level emergencies, such as chemical releases, police activity, etc., which are sent through phone, text, and email. Land-lines automatically receive alerts. Residents with a mobile phone or digital voice service must register.

Given that the City of Houston and Harris County systems require both knowledge of and registration for, both are

74 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

limited in their reach, particularly for residents who have limited English and technology proficiency. California legislators passed a law in September 2018 allowing counties to automatically enroll residents in county-operated emergency notification systems that will alert residents using the phone numbers attached to their utility accounts, as less than 30 percent of residents were signed up to receive emergency alerts via cell phone and email as of 2017.[75]

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15) Non-English Media Plan

Ensure Ready Harris and Ready Houston have an outreach plan targeting non-English media, informed by immigrant advocates, to increase access to timely, accurate, and actionable information for all.

Proposed implementers: Harris County Office of Homeland Security and Emergency Management, City of Houston Office of Emergency Management, and City of Houston Office of New Americans and Immigrant Communities

Disaster phase: Preparedness/Response

Level: County/City

Approach: Policy

Opportunity: Inclusive communication

Rationale: HAP interviews brought to light frustrations from immigrants, service providers, and emergency responders regarding the difficulty accessing and disseminating accurate and timely information. HILSC commissioned preliminary research to identify non-English and culturally-specific media in the Houston area [Appendix H]. As the proposed primary liaison between city and county emergency management offices and immigrant-serving organizations, Office of New Americans and Immigrant Communities is well-positioned to inform and support the development and implementation of a communications plan to ensure accurate emergency information reaches a broad audience. Communications coming directly from the Emergency Operations Center will ensure timely distribution.

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16) Verify Immigrant-Specific Information

Identify, verify, and disseminate emergency information specific to immigrants via HILSC FAQ, Immigrant Rights Hotline (833.HOU.IMMI), and the NeedHOU website; and provide to Emergency Operations Centers and ONIAC to distribute to shelters and relief centers to increase immigrant access to accurate, timely, and actionable information.

Proposed implementers: HILSC members and partners

Disaster phase: Response, Recovery

Level: Nonprofit

Approach: Program/Operations

Opportunity: Inclusive communication

Rationale: HILSC created our FAQ [Appendix D] for Immigrant Survivors of Disasters for service providers advising immigrant clients, particularly those who are low-income and undocumented. It provides answers to immigrant-specific questions that are not common knowledge. HILSC provides information and referrals to immigrant-appropriate resources through the Immigrant Rights Hotline (833.HOU.IMMI). The Hotline is staffed by bi-lingual operators from immigrant-serving organizations with training in referrals. The operators have access to translation services to serve the 145 languages that are spoken in Houston.[76] During a disaster, the hotline also serves to disseminate accurate, timely, and actionable information.

Finally, the NeedHOU website is a crowd-sourced social service referral system based on one built during Harvey to connect needs with resources. Though data changes are verified in day-to-day operations, a disaster override function will

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75 Bree Burkitt and Perry Vandell, "As California Wildfires Force Evacuations, Lawmakers Hope New Alert System Will Save Lives," Arizona Republic, November 9, 2018, https://www.azcentral.com/story/news/2018/11/09/how-effective-emergency-alerts-natural-disasters/1945966002/.

76 Lomi Kriel, "Just How Diverse Is Houston? 145 Languages Spoken Here," Houston Chronicle, November 5, 2015, https://www.houstonchronicle.com/news/houston-texas/article/Houstonians-speak-at-least-145-languages-at-home-6613182.php.

allow real-time communication. Crowd sourcing and cooperative efforts have proven to be powerful tools in responding to crises and emergency situations.[77] These tools will ensure needed information is available immigrants through a variety of channels.

Despite their vital role in response and recovery, many first and second responders aren't provided information specific to ensuring immigrant safety in disaster response and recovery. HILSC commits to maintaining these resources for all. Wide-spread knowledge and use of these tools will help immigrants obtain answers to important questions and organizations to deploy resources more efficiently.

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17) Emergency Notification via Schools

Partner with school districts to communicate emergency information via their robocall and text messaging systems to increase access to accurate information for all.

Proposed implementers: Harris County Office of Homeland Security and Emergency Management and City of Houston Office of Emergency Management

Disaster phase: Preparedness

Level: City/County

Approach: Policy

Opportunity: Inclusive communication

Rationale: Given that the City of Houston and Harris County systems require both knowledge of and registration for, both are limited in their reach, particularly among residents who have limited English, literacy and access to technology.

Houston Independent School District (HISD) has a text messaging system that automatically sends a text message to all numbers listed in the district's School Information System asking them if they want to enroll in emergency notification. This prompt increases participation by reducing the burden to register on the user. School administrators and HISD central offices send messages only for emergencies such as school closings and lockdowns. Using this and similar systems with other school districts to distribute disaster information will help reach low-income and immigrant residents through a trusted resource. School district partnerships will allow emergency officials to distribute accurate, timely and actionable information and reduce misinformation and rumors.

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18) Immigrant Community Liaison

Serve as the point of contact for local Emergency Operation Centers for immigrant-related issues and ensure that emergency communications are linguistically and culturally appropriate to increase access to accurate, timely, and actionable information for all.

Proposed implementers: City of Houston Office of New Americans and Immigrant Communities

Disaster phase: Response

Level: County/City

Approach: Policy

Opportunity: Inclusive communication

Rationale: As a city office within Houston's Department of Neighborhoods, Office of New Americans and Immigrant Communities (ONAIC) is well-positioned to serve as a liaison between the immigrant community it serves and city and county departments. ONAIC has access to both their network of immigrant-serving organizations as well as a variety of city departments. Under Houston Mayor Sylvester Turner's Complete Communities initiative, city departments are charged with working with residents to provide all with quality services and amenities. ONAIC is positioned to break down silos

77 David Alexander, "Disaster and Emergency Planning for Preparedness, Response, and Recovery," September 2015, http://oxfordre.com/naturalhazardscience/view/10.1093/acrefore/9780199389407.001.0001/acrefore-9780199389407-e-12

between departments for a coordinated approach to services for immigrants. As such, ONAIC should play a central role – and be staffed appropriately with bilingual staff – in emergency management to ensure the needs of our region's large immigrant population are addressed in disaster preparedness, response, and recovery.

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19) Language Access for First Responders

Coordinate the availability of multilingual volunteers and language access technology for first responders and client-facing providers at shelters and supply centers to increase access to assistance for non-English speaking people.
Proposed implementers: City of Houston Office of New Americans and Immigrant Communities
Disaster phase: Preparedness, Response
Level: County/City
Approach: Policy
Opportunity: Accessible resources

Rationale: In disaster response, large service agencies ramp up staff and volunteers to serve the multitude of victims. Given the diversity of Houston's population – speaking 145 languages – it is unrealistic to believe there will always be someone on hand to provide interpretation. The Office of New Americans and Immigrant Communities (ONAIC) can recruit and deploy multilingual volunteers where needed, especially at shelters. All efforts can be supported by the iSpeak Language Access app, contracted by ONAIC, that provides simultaneous, live interpretation though mobile devices.

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20) Trauma Informed Training

Implement staff and volunteer trauma-informed, cultural effectiveness and mental health/self-care workshops to improve access to safe, secure response and recovery resources for all.
Proposed implementers: Federal Emergency Management Agency (FEMA), the American Red Cross, and other organizations and agencies that provide emergency services
Disaster phase: Preparedness, Recovery
Level: Federal/State, County/City, Nonprofit
Approach: Policy, Program/Operations
Opportunity: Cultural competence

Rationale: Cultural ignorance, ethnic insensitivity, racial isolation, and racial bias in information dissemination and relief assistance all contribute to the disparate impact to and recovery for low-income persons of color.[78] Due to the diversity of the greater Houston region, frontline government employees, non-profit professionals, and volunteers must understand how to work with diverse populations and how to recognize and respond to trauma. HILSC applauds Houston Mayor Turner's Welcoming Houston commitment to develop tools and resources that provide public safety information in different languages and that are culturally sensitive.[79]

Many individuals without legal status have been victims of violence and past trauma related to their migration story. These experiences can compound the effect of disaster-related trauma. Racial profiling is also heightened during disasters.[80] In the past, government agencies and major private relief agencies typically failed to provide materials or

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78 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

79 Accessible at www.welcominghouston.org.

80 "One Year After the Storm: People's Tribunal on Hurricane Harvey Recovery," August 24, 2018, Houston Organizing Movement for Equity (HOME) and Barbara Jordan-Mickey Leland School of Public Affairs at Texas Southern University.

interpreters to serve monolingual survivors or to provide culturally appropriate services. Agencies with linguistic and cultural capacity often are small and under-resourced.[81]

Priority should be given to hiring staff members who speak the same language as clients, share the similar ethnic backgrounds, and are local residents. If not possible, all staff should receive cultural competency training so they are sensitive to sociocultural factors – particularly those related to lacking legal status – that pose barriers to navigating post-disaster recovery bureaucracy.[82] Included in any training should be how trust – or lack thereof – of institutions can affect a person's willingness to seek assistance and the role of trauma in behaviors during a disaster. HILSC applauds Houston Mayor Turner's Welcoming Houston commitment to continue to improve the multilingual and multicultural capacities of employees at public offices and public institutions to better respond to the needs of immigrants.[83] Responders must also know how to reach interpretation services and have access to answers about immigrant-specific questions.

During Hurricane Harvey response and recovery, many immigrants did not pursue assistance they qualified for. Some staff and volunteers of agencies that sharply increase capacity in disaster response unintentionally presented barriers for immigrants. Volunteer lawyers often had to advocate on their behalf. For example, one lawyer reported an immigrant who approached the legal assistance table at the emergency shelter at George R. Brown. After a woman stood in line for Federal Emergency Management Agency (FEMA) assistance for over two hours, she was told she did not qualify for assistance because she did not have legal documentation. She immediately left, too intimidated to ask additional questions. The lawyer took her back to the FEMA representative to begin the application process, having determined with a few simple questions that her child is eligible as he was born in the U.S.

HILSC offers a Cultural Safety Training that is a trauma-informed curriculum to reduce barriers for immigrants to social services by teaching agency staff culturally safe practices and how to care for themselves through stressful situations. The curriculum aims to reduce discriminatory acts and rhetoric to build a safe environment for individuals and families from diverse backgrounds and experiences. Regardless of background, most people requesting disaster assistance have sustained trauma. Cultural Safety Training will benefit individuals seeking assistance, agency staff, and agencies.

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21) Immigrant Accessibility Index

Ensure United Way's 211 Helpline includes data fields to identify organizations that provide secure disaster services for immigrants. Employ HILSC's Immigrant Accessibility Index to identify organizations with low barriers to services and increase access to resources.

Proposed implementers: United Way
Disaster phase: Recovery
Level: Nonprofit
Approach: Policy
Opportunity: Accessible resources

Rationale: United Way's 211 Helpline can be a source of information and referrals for individuals in need. Unfortunately, the database does not currently make it possible to identify services that are safe and secure for immigrants without full legal status, and listings often contain dated information. False leads on eligibility are inefficient for the clients, many of whom have limited time and transportation. Taking time off from work may not be an option, as they may face sacrificing the job or pay, and even driving is a risk for undocumented people who could be deported as a result of a routine traffic stop. Any number of false leads can cause people to give up and stop seeking much needed assistance, potentially

81 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

82 Mai Thi Nguyen, "Disaster Recovery Among Multiethnic Immigrants," Journal of the American Planning Association, September 2014, https://www.researchgate.net/publication/313888306_Disaster_Recovery_Among_Multiethnic_Immigrants.

83 Accessible at www.welcominghouston.org.

sacrificing the health or safety of their families. Adding data fields specific to immigrant concerns into United Way's 211 database will allow for more targeted and successful referrals and the procurement of services. HILSC's Immigrant Accessibility Index [Appendix F] will further help refine searches to find resources that are safe and secure for immigrants.

22) Safe Emergency Shelters

Ensure the Department of Homeland Security, including Immigration and Customs Enforcement, are not present at emergency shelters, supply centers, food pantries, and other relief centers where disaster victims receive services to ensure immigrants feel safe accessing these resources.

Proposed implementers: Managing organizations of emergency shelters, supply centers, food pantries, and other emergency relief centers

Disaster phase: Response

Level: County/City, Nonprofit

Approach: Policy

Opportunity: Accessible resources

Rationale: In the aftermath of a catastrophic event, the Department of Homeland Security (DHS) turns to its Surge Capacity Force, a group of employees from DHS and employees from every department or agency in the federal government. Immigration and Customs Enforcement (ICE) and Customs and Border Patrol (CBP) are divisions of DHS and, for many immigrants, a DHS badge is as fear-inducing as an ICE badge.

Public perception after Harvey was that there were more DHS vehicles than first responders on the roads, and DHS trucks were seen at supply distribution centers.[84] Almost every HILSC interviewee from an immigrant-serving organization reported that DHS, CBP and ICE presence at the emergency shelter at George R. Brown prevented clients from seeking assistance there. They also assisted with recovery throughout the city.[85] Conversely, BakerRipley prevented ICE from being present at the emergency shelter at NRG Stadium without compromising safety. Consequently, HILSC partners felt comfortable referring clients there after it opened. Until then, people stayed home even in unsafe conditions – a Harvard study suggests average levels of fine particle pollution were nearly 32 times higher in homes flooded by Harvey than in non-flooded homes. Ten months after Harvey, 16% of Texas Gulf Coast residents affected by the storm had a new or worsened health condition, including respiratory problems from agents such as bacteria and mold in water-damaged homes. [86]

The presence of uniformed DHS and/or ICE officers creates an atmosphere of fear and severely limits access to shelters and other points of assistance for people without full legal status or within mixed status families. This ultimately increases the health burden as people are later treated in emergency rooms and public clinics. The Texas Hospital Association's assessment of Harvey-related costs, published in February 2018, estimated disaster-related costs for ninety-two reporting hospitals at $460 million.[87] Safe, secure access for all residents is essential for regional resilience.

84 "One Year After the Storm: People's Tribunal on Hurricane Harvey Recovery," August 24, 2018, Houston Organizing Movement for Equity (HOME) and Barbara Jordan-Mickey Leland School of Public Affairs at Texas Southern University.

85 Accessible at: https://twitter.com/adrianflorido/status/904199766501969920

86 Juanita Constible, "The Emerging Public Health Consequences of Hurricane Harvey," NRDC, August 29, 2018, https://www.nrdc.org/experts/juanita-constible/emerging-public-health-consequences-hurricane-harvey.

87 "Report Offers Findings and Recommendations to Improve Disaster Preparedness and Response for Future Events," Texas Hospital Association, February 7, 2018, https://www.tha.org/Public-Policy/Newsroom/Texas-Hospital-Association-Releases-Special-Report-on-Hospital-Disaster-Response-During-Hurricane-Harvey.

23) Non-Discrimination Policies

Post summaries of non-discrimination policies, inclusivity statements, or similar policies in at least Spanish and English along with translations available in the additional top five languages spoken in Houston outside of emergency shelters, supply centers, food pantries, and other relief centers to increase access to safe, secure response and recovery resources for all.

Proposed implementers: Managing organizations of emergency shelters, supply centers, food pantries, and other emergency relief centers

Disaster phase: Preparation, Response

Level: Nonprofit

Approach: Policy

Opportunity: Accessible resources

Rationale: The inclusivity statement of the American Red Cross reads, "Sheltering includes more than just providing a facility. It is designed to offer a safe space where a variety of clients' needs can be met. Red Cross services are delivered to individuals, families, and communities with no discrimination as to race, color, national origin, religion, gender, gender identity, age, disability, sexual orientation, citizenship, or veteran status. The American Red Cross shall ensure inclusion of all diverse communities in its shelter operations."

Despite this policy, there is a wide-spread perception that the ARC and other agencies will not help people without Social Security numbers. This misunderstanding is fueled by immigrant experience with staff and/or volunteers who ask for Social Security numbers and then deny services to those who fail to provide them. Publicly posting policies, especially those that prohibit the sharing of individual information, will visibly inform volunteers and victims that emergency assistance is safe and secure for all to access. Internal policies need to shift as well. When BakerRipley set up an emergency shelter at NRG Stadium, they reviewed a standard intake template and removed questions they knew were barriers to immigrants. These two messages were communicated among informal channels so HILSC partner organizations felt confident sending clients who needed shelter to NRG Stadium. Such knowledge and simple actions reduce barriers to service for all Houston-area residents.

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24) Disaster Case Management

Coordinate funding streams and disaster case management (DCM) organization grantees to: 1- provide trauma-informed, cultural effectiveness training and mental health/self care training and support to case managers 2- include grassroots organizations in DCM funding systems, and 3- train case managers to identify legal issues after a disaster and provide a referral process to legal service providers to increase efficiency and successfully close more cases.

Proposed implementers: HILSC, United Way, and other case management funders

Disaster phase: Preparedness, Response, Recovery

Level: Nonprofit

Approach: Policy

Opportunity: Accessible resources, Cultural competence

Rationale: There is no question that in Hurricane Harvey response and recovery, the Houston area's disaster case management (DCM) system was inadequate to meet the need. Despite the tens of millions of dollars committed to DCM from sources including the Hurricane Harvey Recovery Fund, the United Way of Greater Houston, and Federal Emergency Management Agency, disaster victims waited months, sometimes more than a year, to work with a case manager – if they worked with one at all. All agree the system did not work, but the causes of the problem are yet to be identified. HILSC recommends a full assessment of the system to identify and address shortcomings. In the meantime, we offer three recommendations in contribution to a larger solution.

1. Provide cultural competency and mental health/self care training and support to case managers. Case manag-

ers were overworked and under-resourced. The case for cultural competency training has been well-laid out in previous rationale (Recommendations #5 and #21). Further, hospitals reported needing to engage chaplains and social workers to help their employees manage stress, anxiety, separation from their families, and burnout.[88] Case managers also worked long hours and faced similar emotional challenges.

2. Include grassroots organizations in DCM funding systems. Some organizations that HILSC interviewed did not fully trust the confidentiality of the American Red Cross' Coordinated Assistance Network (CAN) and therefore chose not to participate in this entry point to DCM. If not for grassroots organizations that either emerged from Harvey response or adopted a response role, many immigrants would not have received DCM services. These small, trusted organizations are made up of and for the people they serve. Despite their unique role in capturing many disaster victims who otherwise fell through the gaps, their size and lack of networks kept them from receiving adequate funding to serve their clientele. Funders providing adequate grants to these agencies will make it possible to reach elusive vulnerable populations following future disasters.

3. Train case managers to identify legal issues after a disaster and provide a referral process to legal service providers to increase efficiency and successfully close more cases. Legal service providers have expertise in many of the issues that arise during and after a disaster. For example, it is standard for legal services organizations to help clients replace paperwork or clear property titles so they can apply for assistance. Leveraging the expertise of legal services providers can expedite the case management process and free case workers to focus on other aspects of their clients' needs so they can close cases more quickly.

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25) Legal Services

Invest in increasing the capacity of civil and immigration legal services, and support coordination with disaster case managers to ensure that legal needs are met, and case management is more efficient.

Proposed implementers: Funders
Disaster phase: Recovery
Level: Systems
Approach: Funding
Timing of Implementation: After
Opportunity: Accessible resources

Rationale: After a disaster, legal needs build up on one another. As one HILSC interviewee notes, if a disaster victim didn't have insurance they may look to Federal Emergency Management Agency (FEMA), but FEMA won't cover the full cost of reconstructing a damaged home. To make dollars stretch a disaster victim may hire unbonded/licensed and perhaps unscrupulous contractors, which can compound issues.

The Hurricane Harvey Relief Fund granted $4.6 Million to Lone Star Legal Aid, Houston Volunteer Lawyers Program, Inc., Equal Justice Works, Disability Rights Texas, Boat People SOS, and the University of Houston Law Foundation to provide community outreach and free disaster legal services to Hurricane Harvey survivors to help them gain stability, recover and rebuild. The funding helped families gain access to FEMA funds, clear their titles and deeds to gain access to home repair services, overcome landlord- tenant issues and much more.[89]

The number of legal issues post-disaster is significant [Appendix I]. Most disaster-response organizations are unaware of both the legal rights and issues faced by disaster survivors and the particular needs of low-income communities and

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88 "Report Offers Findings and Recommendations to Improve Disaster Preparedness and Response for Future Events," Texas Hospital Association.

89 Anthony Chase and William Jackson, Hurricane Harvey Relief Fund Evaluation and Lessons Learned, Hurricane Harvey Relief Fund, August 24, 2018, https://ghcf.org/wp-content/uploads/2018/08/Hurricane-Harvey-Relief-Fund-Evaluation-Findings-v3.pdf.

immigrants. Legal aid lawyers are deeply networked in low-income communities and have experience creating access for people who face barriers to services and information.[90] Integrating legal aid and immigration lawyers into the long-term recovery system will require an investment to ensure that an adequate number of lawyers are available to meet the demand.

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26) Mental Health

Identify and provide funding to organizations working with immigrants for social work staff and/or systems to support client mental health and wellness through individual or group support.

Proposed implementers: Funders
Disaster phase: Preparedness, Response, Recovery
Level: Nonprofit
Approach: Funding
Opportunity: Accessible care, Cultural competence

Rationale: During HILSC's focus groups for developing the HAP and other projects conducted in summer of 2018, residents repeatedly became emotional and noted that the group offered them their first opportunity to talk about how Hurricane Harvey impacted them and their families. Facilitators and the other participants were profusely thanked for the opportunity.

Research found that while about three in ten impacted residents reported declines in their own mental health as a result of Harvey, just 8% of affected residents say they or someone in their household has received counseling or mental health services since the storm. Another survey suggested that mental health help after Harvey has been slow to come to those most in need.[91]

Mental health emerged as a prominent need in both research specific to Harvey and more broadly in relation to disasters' effects on immigrant populations. In recognition of this, the Hurricane Harvey Relief Fund granted $7.6 Million to Texas Children's Hospital Baylor College of Medicine and the University of Texas Foundation/UTHealth to embed behavioral health into primary care across Harris County. This systems-level change expands access to and impact of behavioral health services.[92] Similar funding must support existing social work staff, who have the appropriate skills needed to facilitate support groups at organizations of all sizes and across disciplines.

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27) Immigration Legal Aid at Shelters

Develop a Memorandum of Understanding with Lone Star Legal Aid, Houston Volunteer Lawyers, and HILSC to coordinate immigration and civil legal aid at major shelters and in response to case manager referrals to ensure availability of accurate, timely, and actionable information and improve access to resources.

Proposed implementers: Texas State Bar, Lone Star Legal Aid, Houston Volunteer Lawyers and HILSC
Disaster phase: Preparedness, Response
Level: Nonprofit
Approach: Program/Operations
Opportunity: Inclusive communication, Accessible resources

Rationale: Pre-existing agreements enable the presence of service providers at emergency shelters, and comprehen-

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90 "Disaster Task Force," Legal Services Corporation.

91 Liz Hamel, Bryan Wu, Mollyann Brodie, Shao-Chee Sim and Elena Marks, One Year After the Storm: Texas Gulf Coast Residents' Views and Experiences with Hurricane Harvey Recovery, The Kaiser Family Foundation and the Episcopal Health Foundation, August 2018, http://www.episcopalhealth.org/files/8115/3495/5619/EHFKFF_Hurricane_Harvey_anniversary_survey_report.pdf.

92 Anthony Chase, Hurricane Harvey Relief Fund Evaluation and Lessons Learned.

sive disaster response plans codify the roles and responsibilities of each participating organization. Lone Star Legal Aid currently has such an agreement, as they have expertise in disaster response. Houston Volunteer Lawyers has a broad database of lawyers to call on, and HILSC partners have immigration expertise. Based on the experience during Harvey, the three organizations together can ensure comprehensive legal services for disaster victims at emergency shelters.

Natural disasters have a disproportionate impact on low-income people, who often face daunting legal issues in the aftermath of a disaster. Survivors often need help obtaining copies of important documents such as birth certificates, driver's licenses, and Social Security cards to apply for or restore benefits and support. Low-income and other vulnerable people who need housing after an emergency are more susceptible to scams and price-gouging.[93] Disasters also increase needs in the core areas of practice for legal aid, such as public benefits, domestic violence prevention, consumer law, and fraud prevention[94] [Appendix I]. The trifecta of Lone Star Legal Aid, Houston Volunteer Lawyers, and HILSC can help meet these needs.

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28) Legal Issue Summaries

Be a source of relevant and timely legal issue summaries to increase accurate, timely, and actionable information for immigrant legal service providers.

Proposed implementers: HILSC members and partners
Disaster phase: Response
Level: Nonprofit
Approach: Program/Operations
Opportunity: Inclusive communication

Rationale: Many immigrant legal service organizations were not prepared to field the common questions clients posed in response to Harvey. HILSC members and partners relied heavily on the HILSC network to answer immigrant-specific legal and social service questions that emerged. HILSC created an FAQ [Appendix D] to capture common questions and their answers, including:

> What can I do if I've lost all of my paperwork?
>
> When will the immigration courts/USCIS/ICE reopen?
>
> How can I find out if my appointment will be rescheduled?
>
> Will accepting disaster relief affect my application for permanent residence or for a visa?
>
> I had to move. How do I change my address with immigration?
>
> I have an ankle monitor but have not been able to charge it – what should I do?

In addition to answering these questions, the FAQ provided updates on Texas Senate Bill 4 and Deferred Action for Childhood Arrivals. The FAQ created during Harvey will serve as a template for future disasters, and HILSC will verify and update answers specific to any given disaster before distributing to first responders and other service providers.

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29) Potential Litigation

Identify potential litigation needs, informed by HILSC partners, to increase access to FEMA and other response and recovery assistance and improve outcomes for low-income immigrants.

Proposed implementers: HILSC members and partners

93 Danny Vinik, "'People Just Give Up': Low-Income Hurricane Victims Slam Federal Relief Programs," Politico, May 29, 2018, https://www.politico.com/story/2018/05/29/houston-hurricane-harvey-fema-597912.

94 "Legal Services Corporation's Disaster Task Force to Hold First Field Hearing," Legal Services Corporation, November 29, 2018, https://www.lsc.gov/media-center/press-releases/2018/legal-services-corporations-disaster-task-force-hold-first-field.

Disaster phase: Recovery
Level: Nonprofit
Approach: Program/Operations
Opportunity: Accessible resources

Rationale: HAP interviews surfaced repeated examples of Federal Emergency Management Agency applications denials for people who perhaps should have been eligible, especially for applications filed on behalf of a qualified household member. Denials are common, but many people do not know that they should appeal or how to do so (see Recommendation #2). Given the number of clients among the HILSC network, HILSC is well positioned to collect stories about denials and identify problematic trends that occur as families begin to rebuild. Trend data may prove to be a powerful advocacy tool to improve the overall responsiveness of government agencies.

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30) Representation to Media
Represent and connect organizations providing immigrant legal services with local and national media to increase the accurate and timely dissemination of actionable information.
Proposed implementers: HILSC members and partners
Disaster phase: Response, Recovery
Level: Nonprofit
Approach: Program/Operations
Opportunity: Inclusive communication

Rationale: During Hurricane Harvey, inaccurate and conflicting information was abundant. Even while Houston Mayor Sylvester Turner was announcing all were welcome at shelters, photos of a Department of Homeland Security truck outside the George R. Brown Convention Center were shared on social media warning immigrants without documentation to stay away. The news media also disseminated conflicting information in an effort to get stories out quickly. HILSC responded by matching media requests with the appropriate partners in our broad network who could speak to any number of specific issues and share information pertaining to immigrant resources and needs.

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31) Representation in Planning
Represent immigrant interests at emergency planning and funding meetings to inform processes with best practices to serve immigrants to ensure accessible resources.
Proposed implementers: HILSC members and partners
Disaster phase: Preparedness, Response, Recovery
Level: Nonprofit
Approach: Policy, Funding
Opportunity: Accessible resources

Rationale: Despite disaster organizations policies and practices to serve undocumented immigrants, immigrant service providers are not confident in the confidentiality and safety of existing recovery systems for immigrants and therefore forego assistance fearing that the information may be misused. This level of diligence has earned these advocates their clients' trust. Despite intentional policies to reach immigrants with private funding, many agencies that received grants to serve immigrants do not take a culturally-competent approach or have the existing trusted relationships required to serve this population.

Recovery data clearly demonstrates this. Immigrants whose homes were damaged by Harvey were less likely to have applied for disaster assistance than U.S. born citizens (40% versus 64%). A full 46% of immigrants whose homes were

damaged said they were worried that if they tried to get help in recovering, doing so would draw attention to the immigration status of themselves or a family member.[95]

Immigrant clients trust HILSC members and partners, proven by the surge of client questions posed on the HILSC listserv during and after Harvey. HILSC and our partners have developed the Immigrant Accessibility Index [Appendix F], a self-assessment tool to assist organizations in identifying unintentional barriers to serving immigrants. The tool has been piloted by HILSC members and partners and is being used in organizations and agencies across Harris County. Questions from the tool can be applied to grant applications to help identify trusted agencies.

It is essential that immigrant service providers be included in preparedness, response, and recovery conversations in order to advocate for systems that help their clients access the resources they are eligible for, while protecting their safety and security.

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32) Continuation of Operations Plan (COOP) Development

Create a Continuation of Operations Plan (COOP) to ensure that expert, trusted agencies have an emergency management plan in place and are therefore available for response and recovery.
Proposed implementers: Immigrant-serving organizations
Disaster phase: Preparedness
Level: Nonprofit
Approach: Policy
Opportunity: Accessible resources

Rationale: Immigrant-serving organizations have earned the trust of their clients, and during Harvey immigrants turned to these organizations as reliable sources of information and safe services. These organizations respond to client crises on a daily basis, but many have not created an emergency management plan for their own agencies. Given their unique position to serve immigrants, HILSC partners should develop a Continuity of Operations Plan (COOP). COOP is an effort to ensure the continued performance of critical business functions during a wide range of potential emergencies. The benefits of crafting a COOP include the ability to: anticipate events and necessary response actions, improve performance through the identification of agency essential functions that must be supported in an emergency, and improve communication to support essential functions throughout the agency.

FEMA has several templates that can be followed, and the City of Houston Office of Emergency Management provides training.[96]

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33) Cash Assistance

Raise funds for financial assistance to immigrants whose needs were created or worsened by a disaster, and disperse those funds to vetted organizations serving immigrants regardless of status.
Proposed implementers: Foundations
Disaster phase: Response
Level: Nonprofit
Approach: Funding
Opportunity: Accessible resources

Rationale: With almost half the foreign-born population in the Houston region living below 200% of the federal poverty

95 Bryan Wu, Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast.

96 Access at: https://www.fema.gov/media-library/assets/documents/170041

level, it is clear that many immigrants in the region live on the economic margins. Disasters worsen their already precarious situations. Further, many immigrants without documentation are ineligible for publicly funded assistance, or opt not to apply to decrease the risk of exposing a loved one to potential deportation. Recognizing the limitation of public money, donors of private funds understood the need for cash assistance to immigrant families. While many organizations officially include undocumented immigrants within their eligibility, reaching this population requires trusted pre-existing relationships. During Harvey, HILSC received private foundation dollars and distributed them to trusted immigrant-serving organizations to redistribute directly to clients. HILSC will play this role in the next disaster, as needed.

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34) Emergency Preparedness

Provide emergency preparedness training and kits to immigrants in order to increase knowledge and preparedness of immigrants, enable a more efficient recovery, and build resilience.

Proposed implementers: Church World Service and HILSC members and partners

Disaster phase: Preparedness

Level: Nonprofit

Approach: Program/Operations

Opportunity: Accessible resources

Rationale: Emergency preparedness is rarely a priority until a pending disaster looms, at which point store shelves are thoughtlessly raided. Research has found that racial and ethnic minorities, including immigrants, are less likely to have had disaster education opportunities and to be involved in hazard preparedness, such as stockpiling emergency supplies and/or purchasing insurance.[97] Further, preparedness materials are usually available only to those who seek them out, and accessibility is often limited by both language and literacy levels (see Recommendation #11).

Respondents to a 2018 survey named housing, financial help, and preparation for future storms as top priorities for additional recovery resources. Despite recognizing the value of preparation, about half of those surveyed said they have not taken steps to prepare for future hurricanes.[98] Few participants in HILSC's immigrant focus group had made any preparations for future storms, as they still were struggling to recover from Harvey almost a year later. Preparedness workshops must target low-income immigrants, who are among the most vulnerable to disasters but least likely to receive assistance.

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97 "Addressing the Needs of Immigrants in Response to Natural and Human-Made Disasters in the United States," American Public Health Association.

98 Liz Hamel, One Year After the Storm: Texas Gulf Coast Residents' Views and Experiences with Hurricane Harvey Recovery.

CONCLUSION:

DRAWING ON HAP AND OTHER STUDIES OF IMMIGRANTS' EXPERIENCES THROUGH HARVEY, A COORDINATED APPROACH TO INTEGRATING IMMIGRANT NEEDS INTO DISASTER PLANNING WILL INCREASE OUR REGION'S RESILIENCE.

Immigrant resilience is essential to the Houston region's resilience – our ability to withstand and mitigate the stress of disaster. Immigrants make up 23% of the Greater Houston region, and disasters take a disproportionate toll on them – particularly those who are low-income. Immigrants are vital to the region's workforce, economy, recovery, and culture. We cannot afford to continue to overlook this community. The vast majority of Houston region residents believe we should integrate immigrants into our society rather than alienate them, as is done by our federal and state administrations' anti-immigrant policies.

Three opportunities to increase immigrant resilience emerged from HAP interviews:

1. Inclusive communication
2. Accessible resources
3. Culturally-competent approaches

Our region's leaders must coordinate emergency management planning and use continued Harvey recovery to build the systems needed for a more equitable recovery for immigrants through future disasters and therefore a regional resilience. Foundationally, decision makers must:

1. Ensure the data informing policy and funding decisions includes vulnerable populations, including immigrants.
2. Inform policy and funding decisions with existing studies that document immigrants' experience in Harvey response and recovery.
3. Consult with immigrant-serving organizations in emergency management planning.

HILSC calls on government and non-profit agencies, including funders, to incorporate HAP recommendations into their strategic emergency management plans. HILSC's collaborative of more than 40 organizations have already begun implementation and we stand ready for partnership in this complex endeavor.

HILSC's website includes our 34 HAP recommendations, which can be filtered by Disaster phase (preparedness, response, recovery), implementation level (federal/state, county/city, nonprofit), implementation approach (policy, program/operations, funding) and opportunity (above). We will also update progress milestones on the recommendations: **hap.houstonimmigration.org**. Please share your successes and check back regularly as together we build a welcoming and resilient region.

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APPENDICES

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