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. 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 that some in the household have some type of legal status – such as permanent residency or citizenship – while others in the household are undocumented. 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. Immigrants are critical to Houston’s workforce. In 2016, 32% of workers were immigrants, and 10% were undocumented. In the aftermath of Hurricane Harvey, construction workers – more than half of whom are immigrants – were in particularly high demand.

Immigrants, particularly low-income immigrants, are disproportionately impacted by disasters. A December 2017 study 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.

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. 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.

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.

The Houston Immigration Legal Services Collaborative (HILSC) calls on Harris County and City of Houston government and non-profit agencies, including funders, to incorporate Humanitarian Action Plan (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.³

Fundamentally, decision makers must:

1. Ensure that 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.

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: hap.houstonimmigration.org.
RECOMMENDATIONS SUMMARY

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.

Red title denotes a HILSC commitment.

1) Federal Enforcement  PG. 24
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  PG. 24
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  PG. 25
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  PG. 26
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 agencies, City of Houston agencies, and Funders

5) Organizational Barriers  PG. 27
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  PG. 27
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  PG. 28
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  PG. 29
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  PG. 30
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  PG. 31
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.

11) Continuations of Operations Plan (COOP) Training  PG. 31
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**  PG. 32
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**  PG. 33
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**  PG. 33
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**  PG. 34
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**  PG. 35
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**  PG. 35
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  PG. 36
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  PG. 37
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  PG. 37
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  PG. 38
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  PG. 39
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  PG. 40
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  PG. 40
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  PG. 41
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  PG. 42
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) Legal Aid at Shelters  PG. 43
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  PG. 43
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  PG. 44
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  PG. 44
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  PG. 45
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  PG. 45
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  PG. 46
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: Funders

34) Emergency Preparedness  PG. 47
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
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 that some in the household have some type of legal status – such as permanent residency or citizenship – while others in the household are undocumented. 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 undocumented immigrant parent and 80% of these children are U.S. citizens.10

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.11 Over 50% of foreign-born residents have limited English proficiency, including an estimated 350,000 undocumented immigrants and 350,000 green-card holders. Almost 40% of foreign-born residents lack a high school diploma.12

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.13 In 2016, 56% of immigrants in Houston owned their homes, as did 41% of undocumented 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.14
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 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.\(^{15}\)

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.”\(^{16}\) 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%).\(^{17}\)

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.\(^{18}\)

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 ensure 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 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.¹⁹

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.²⁰ 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 (DHS), which is also home to Immigration 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).²¹ 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.”²² 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 Arrivals (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.”²³ This disclosure is a significant disincentive for families with qualified household members to apply for aid.

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.²⁴ 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.²⁵
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 Houston-based 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. 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. 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.

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

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.

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. It expects public charge provisions to exacerbate that. Pediatricians, public health researchers, and child health and policy experts strongly oppose the changes to public charge rules as they endanger the health and well-being of immigrants and their children.

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 Fifth 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.

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.

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).\textsuperscript{36}

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.\textsuperscript{37} 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.

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, Texas Center for Community Services, 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. 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

1. **Social Services Advocacy** – HILSC began engaging in organizational advocacy and providing expertise to break down institutional barriers to serving immigrants.
2. **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.
3. **NeedHOU.org** – HILSC developed a social service database of safe, secure services verified and maintained by our Access to Services working group.
4. **Harvey Assistance for Immigrants** – HILSC raised and distributed $200,000 in direct cash assistance to immigrants via grants to immigrant-serving organizations [Appendix E].
5. **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.
6. **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.”
7. **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.
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

1. To help immigrant-serving organizations be prepared to best serve their clients through disasters.
2. To promote coordination among immigrant-serving organizations and disaster agencies in disaster planning for preparedness, response, and recovery.
3. 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:

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 Agencies Interviewed for the HAP

- American Red Cross, Recovery
- City of Houston Health Department
- 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
- United Way of Greater Houston
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.

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

1) Federal Enforcement
Suspend interior 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

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. 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.” The agencies also said they would prioritize “lifesaving and life-sustaining activities” during the storm and its aftermath. 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.” 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.” Public safety should be the highest priority.

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)
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’. 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

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. An estimated 15% of children in Houston had at least one undocumented immigrant parent, and 80% of these children are U.S. citizens. 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. As a result, FEMA Individual Assistance data, on which many recovery funding decisions are based, misses many immigrant households.
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.

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 “un-housed”.

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.

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 agencies, City of Houston agencies, and Funders

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.49

### DISASTER PHASE: Preparedness

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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

**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.”50

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.\(^{51}\)

**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

**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.\(^{52}\)

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.\(^{53}\) The “fenceline” zones within three miles of hazardous chemical facilities suffer a greater risk of cancer and respiratory illness from air pollution.\(^{54}\) 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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**DISASTER PHASE**
Response  
**LEVEL**  
County/City  
**APPROACH**  
Policy  
**THEME**  
Cultural Competence
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

**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. 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 undocumented immigrants 41%, despite generally lower income levels of many undocumented immigrants. 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. Pew Trusts found a $4-to-$1 benefit when building construction exceeds the International Code Council’s (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.

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

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. 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.
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

**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 “second 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. 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. 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.

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, 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.

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.
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.

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.67

**PROPOSED IMPLEMENTERS:** Harris County and City of Houston agencies, and emergency response and recovery providers

**RATIONAL:** 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.68

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 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.
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

**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 undocumented immigrants and 350,000 green-card holders. Almost 40% of foreign-born residents lack a high school diploma. 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. 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 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.

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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

**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.72 73

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

**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.74 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.

PROPOSED IMPLEMENTERS: Federal Emergency Management Agency, Texas General Land Office, 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

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.75

HILSC vets immigrant-specific information and makes it available through our FAQ [Appendix D] and Immigrant Rights Hotline (833-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.

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

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 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 2017.76

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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

**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

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. 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 allow real-time communication. Crowd sourcing and cooperative efforts have proven to be powerful tools in responding to crises and emergency situations. 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.


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

**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 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

**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, and HILSC

**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. 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.

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. In the past, government agencies and major private relief agencies typically failed to provide materials or interpreters to serve monolingual survivors or to provide culturally appropriate services. Agencies with linguistic and cultural capacity often are small and under-resourced.

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. 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. 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

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 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

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.85 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.86

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.87

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. Safe, secure access for all residents is essential for regional resilience.

**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

**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.
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

**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 managers 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. 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

**RATIONALE:** 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 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. 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.

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. HILSC was able to fund four additional immigration legal services providers as part of the Disaster Recovery Legal Corps to help immigrants impacted by Harvey get copies of lost immigration paperwork, re-open cases after missed appointments due to Harvey, and help undocumented immigrants gain legal status so they are less vulnerable for the next disaster.

**DISASTER PHASE**
- Recovery

**LEVEL**
- County/City

**APPROACH**
- Funding

**THEME**
- Accessible Resources

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

**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.\(^{92}\)

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.\(^{93}\) 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.

**27) 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

**RATIONALE:** Pre-existing agreements enable the presence of service providers at emergency shelters, and comprehensive 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.\(^{94}\) 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\(^{95}\) [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

**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

**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

**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

**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.96

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.

### 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

**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.

### 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:** Funders

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

**RATIONALE:** Emergency preparedness is rarely a priority until a pending disaster looms, at which point store shelves are thoughtlessly depleted. 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. 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. 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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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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A GUIDE FOR DECISION MAKERS: STUDIES THAT ILLUSTRATE THE IMPACT OF DISASTERS ON IMMIGRANTS

Pre-Existing Conditions in a Time of Disaster: Challenges and Opportunities Advancing an Equitable Recovery for Vulnerable Populations
🔗 lhwassociation.org/sites/default/files/pre-existing_conditions_in_a_time_of_disaster.pdf

A Profile of Houston’s Diverse Immigrant Population in a Rapidly Changing Policy Landscape
Migration Policy Institute, September 2018.

The Emerging Public Health Consequences of Hurricane Harvey
🔗 nrdc.org/experts/juanita-constible/emerging-public-health-consequences-hurricane-harvey

Hurricane Harvey Relief Fund Evaluation and Lessons Learned
Hurricane Harvey Relief Fund, August 2018.

Industry’s Delay in Plant Shutdowns Worsened Air Pollution During Hurricane Harvey
Environmental Integrity Project, August 2018.

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

Hurricane Harvey: The Experience of Immigrants Living on the Texas Gulf Coast
Kaiser Family Foundation and Episcopal Health Foundation, March 2018.
🔗 kff.org/disparities-policy/report/hurricane-harvey-experiences-immigrants-texas-gulf-coast/

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.
🔗 episcopalhealth.org/files/7315/1240/4311/An_Early_Assessment_of_Hurricane_Harveys_Impact.pdf
After the Storm: Houston’s Day Labor Markets in the Aftermath of Hurricane Harvey
University of Illinois at Chicago, November 2017.

A Looming Immigration Law is Hurting Houston’s Ability to Help Undocumented Residents in Wake of Harvey
pri.org/stories/2017-08-29/looming-immigration-law-hurting-houston-s-ability-help-undocumented-residents

For Houston’s Many Undocumented Immigrants, Storm is Just the Latest Challenge
washingtonpost.com/local/immigration/for-houstons-many-undocumented-immigrants-storm-is-just-the-latest-challenge
**APPENDIX B**

**IMMIGRANT ELIGIBILITY FOR DISASTER RELIEF PROGRAMS**

**Disaster Supplemental Nutrition Assistance Program (D-SNAP)**

US Department of Agriculture (USDA), Food and Nutrition Service (FNS)

**DESCRIPTION:** Short-term, one-time food assistance benefit for households affected by a natural disaster in approved disaster areas, with relaxed eligibility criteria and a more streamlined certification process than regular SNAP.

D-SNAP is primarily for households not currently receiving SNAP. Many important details of the program depend on the state’s request to operate a D-SNAP shortly after a disaster occurs. These include the application period, the D-SNAP benefit amount, the availability of supplements for ongoing SNAP households, and the exact eligibility criteria.

HHSC releases information through local media before the program application period begins, including the location of application sites, their days of operation, and the eligibility requirements.

**ELIGIBLE IMMIGRATION STATUS:** No citizenship or immigration status restrictions.

8 U.S.C. § 1611(b)(1)(B) (describing an exception from the general immigration status eligibility criteria for federal public benefits for “Short-term, non-cash, in-kind emergency disaster relief”).

7 C.F.R. § 280.1 (describing the USDA Secretary's authority to establish “temporary emergency standards of eligibility” for disaster food assistance programs, without reference to citizenship or immigration status eligibility criteria).

USDA FNS, Disaster SNAP Guidance 3 (2014), fns-prod.azureedge.net/sites/default/files/D-SNAP_handbook_0.pdf (noting that citizenship status eligibility restrictions do not apply to D-SNAP).

See also FEMA, FP 104-009-03, Individual and Households Program Unified Guidance (IHPUG) 13 (2016), fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fdddb308971/FEMAIHPUG_CoverEdit_December2016.pdf (stating that the citizenship, non-citizen national, or qualified alien eligibility requirement does not apply to D-SNAP); FEMA Citizenship/Immigration Requirements, fema.gov/faq-details/FEMA-Citizenship-Immigration-requirements-1370032118159 (last updated Dec. 2, 2015) (“Individual Assistance programs such as Crisis Counseling, Disaster Legal Services and other short-term, non-cash emergency assistance, such as congregate shelters, are available to an individual and family regardless of citizenship status); and excerpt from NILC, Guide to Immigrant Eligibility for Federal Programs (4th ed. 2002), chapter last updated Oct. 2017, nilc.org/issues/economic-support/disaster-help/ (noting that “[a]ll immigrants, regardless of immigration status, are eligible for short-term, noncash, in-kind, emergency disaster relief and similar services,” including D-SNAP).
See also Texas Health and Human Services Policy Guidance memo on implementing D-SNAP, hhs.texas.gov/sites/default/files//documents/laws-regulations/handbooks/twh/bulletins/09-15-17_17-11_2.pdf (Sept. 2017) (“Citizenship and alien status are not applicable. Applicants cannot be disqualified due to citizenship or alien status.” at pg. 7).

LINKS TO APPLY/NEXT STEPS: HHSC advertises application site locations in the days leading up to the application period. D-SNAP applications will not necessarily be taken at HHSC Benefits Offices. Online D-SNAP applications have not been made available following previous disasters in Texas.

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**Federal Assistance to Individuals and Households Program (IHP) - Housing Assistance (HA)**


**DESCRIPTION:** “Provides financial assistance and/or direct assistance to those who have, as a direct result of a major disaster or emergency, housing-related expenses and serious needs that can't be met through other means. 42 U.S.C. § 5174; 44 C.F.R. § 206.110(a).

Assistance is limited to 18 months following the date of the disaster declaration and may be extended, at the State's request, due to extraordinary circumstances. 42 U.S.C. § 5174(c)(1)(B)(iii); and 44 C.F.R. § 206.110(e).

Recipients can receive more than one type of HA, including a combination of financial assistance and direct services. 42 U.S.C. § 5174(b)(2)(B); 44 C.F.R. § 206.110(c). FEMA determines the appropriate types of HA for which a recipient may be eligible. 42 U.S.C. § 5174(h), 44 C.F.R. § 206.110(b).

Financial HA may include:

- Lodging expense reimbursement for short-term lodging, e.g. at hotels (FEMA, FP 104-009-03, Individual and Households Program Unified Guidance (IHPUG) 6 (2016), fema.gov/media-library-data/1483567080828-1201b6eefbf9fbbd7c8a070fddb308971/FEMA-IHPUG_CoverEdit_December2016.pdf [hereinafter IHPUG]);
- Rental assistance (42 U.S.C. § 5174(c)(1)(A)(i); 44 C.F.R. § 206.117(b)(1)(i)); or
- Grants to repair or replace an owner-occupied primary residence (42 U.S.C. § 5174(c)(2); 44 C.F.R. § 206.117(b)(2)).

Financial assistance awards can range from $50 up to the annual program maximum, which is $34,000 for emergencies and major disasters declared on or after Oct. 1, 2017. 42 U.S.C. § 5174(h); 44 C.F.R. § 206.110(b); Notice of Maximum Amount of Assistance Under the Individuals and Households Program, 82 Fed. Reg. 196 (Oct. 12, 2017).
When there is a lack of available housing resources, FEMA may provide Direct Housing Assistance (DHA). 42 U.S.C. § 5174(c)(1)(B)(i); 44 C.F.R. § 206.117(b)(1)(ii). DHA is not counted toward the IHP maximum award (IHPUG 7), and may include:

- Multi-family lease and repair, i.e. FEMA enters into lease agreements with owners of multi-family rental property to make repairs in order to provide temporary housing (42 U.S.C. § 5174(c)(1)(B)(ii));
- Manufactured housing units (IHPUG 7); or
- Permanent or semi-permanent housing construction, i.e. home repair and/or construction services in areas outside the continental United States and in other locations where no alternative housing resources are available (42 U.S.C. § 5174(c)(4); 44 C.F.R. § 206(b)(4)).

**ELIGIBLE IMMIGRATION STATUS:** “The applicant or an adult household member must be a U.S. citizen, a non-citizen national, or a qualified alien. In addition, the parent or legal guardian of a minor child who meets the criterion can apply for assistance on behalf of the child as long as they live in the same household. The parent or legal guardian must register as the co-applicant. Individuals self-certify their citizenship status on a Declaration and Release form (FEMA Form 009-0-3) that asks applicants to declare, under penalty of perjury, that they have an eligible status. IHPUG 11-12.

See FEMA, FEMA Citizenship/Immigration Requirements, fema.gov/faq-details/FEMA-Citizenship-Immigration-requirements-1370032118159 (last updated Dec. 2, 2015) (“[U]ndocumented individuals can apply [for IHP] on behalf of a minor child who is a citizen and has a social security number. ... If you cannot sign the Declaration and Release [form stating that you are a U.S. Citizen, Non-Citizen National, or a Qualified Alien], another adult household member who is eligible can sign it and no information regarding your status will be gathered.”).

Special Consideration: FEMA may dispose of occupied manufactured housing units by selling them directly to the occupant at a fair and equitable price. Households that received such a unit through the citizenship or immigration status of a minor child member may be eligible to purchase the unit for the benefit of the child. FEMA staff will consult the Office of Chief Counsel to ensure the necessary legal requirements to complete the sale are met. IHPUG 81-82.”

**LINKS TO APPLY/NEXT STEPS:**
Options to apply include:
- disasterassistance.gov
- Downloading the FEMA application for smartphones at fema.gov/mobile-app or their mobile provider's application store
- Calling 800-621-3362
- Visiting a Disaster Recovery Center (DRC) in person
- Applying in person with Disaster Survivor Assistance (DSA) Teams, which FEMA sends into affected communities.
Transitional Shelter Assistance (TSA)

DESCRIPTION: Provides short-term lodging (5-14 days, adjustable to 30 days) in approved hotels or motels for evacuees who are not able to return home for an extended or indeterminate period of time following a disaster because their communities are either uninhabitable or inaccessible due to disaster-related damages, and congregate shelters have closed. FEMA pays the participating hotels and motels directly. The recipient is responsible for all other costs, including laundry, room service, parking, telephone, food, transportation or other services. FEMA, in conjunction with the state, may extend the initial period of assistance in 14-day intervals for up to six months from the date of disaster declaration.

TSA will not count toward a recipient's maximum amount of assistance available under the Individuals and Households Programs (IHP).

TSA is subject to a state cost-share, so the state must request that FEMA authorize the use of TSA for the declared disaster in specific geographic areas.

FEMA, Fact Sheet: Transitional Shelter Assistance (Aug. 2017), fema.gov/media-library-data/1504386291776-95f2e849464628ac124a7f859c448e2e/FactSheetTransitionalShelterAssistance.pdf.

Stafford Act § 403, 42 U.S.C. § 5170b(a)(3)(B) (authorizing federal agencies to provide assistance to meet immediate threats to life and property resulting from a major disaster, including emergency shelter)

ELIGIBLE IMMIGRATION STATUS: Unclear. No citizenship or immigration status requirements are referenced in the authorizing statute or FEMA Fact Sheet on TSA, and TSA seems to fit the description of “short-term, non-cash, emergency aid,“ for which undocumented immigrants are eligible. However, in its National Disaster Housing Strategy, FEMA includes citizenship and immigration status criteria among the basic eligibility criteria for all Stafford Act disaster housing programs. Specifically, it states that “applicants must declare that they are a U.S. Citizen, Non-Citizen National, or Qualified Alien to receive assistance.... Minors who are a U.S. Citizen, Non-Citizen National, or Qualified Alien may be eligible to receive assistance on behalf of their parents or heads of the household, who are non-qualified citizens.”

FEMA, Fact Sheet: Transitional Shelter Assistance (Aug. 2017), fema.gov/media-library-data/1504386291776-95f2e849464628ac124a7f859c448e2e/FactSheetTransitionalShelterAssistance.pdf.

FEMA, National Disaster Housing Strategy, Annex 7: Summary of Guidance on Disaster Housing Assistance Available under the Stafford Disaster Relief and Emergency Assistance Act, including Eligibility Criteria and Application Procedures 129 (Jan. 16, 2009), fema.gov/media-library-data/20130726-1747-25045-9685/ndhsannex7.pdf [hereinafter NDHS].

See also FEMA, Questions and Answers for Undocumented Immigrants Regarding FEMA Assistance (last

LINKS TO APPLY/NEXT STEPS:
• disasterassistance.gov/
• FEMA Helpline: 1-800-621-3362

Upon notification of eligibility, recipients must find and book their own hotel rooms, and can search for participating hotels at: femaevachotels.com/

FEMA, Fact Sheet: Transitional Shelter Assistance (Aug. 2017), fema.gov/media-library-data/1504386291776-95f2e849464628ac124a7f859c448e2e/FactSheetTransitionalShelterAssistance.pdf.

Post-Hurricane Harvey, it appears that FEMA contacted eligible disaster survivors who had registered for FEMA disaster assistance; there was no separate application process for TSA. American Public Works Ass’n, Information from FEMA Regarding Hurricane Harvey, apwa.net/MYAPWA/About/Hurricane_Harvey-FEMA/MyApwa/Apwa_Public/Hurricane_Harvey-FEMA.aspx?hkey=d51a77f1-3941-4d1c-9dc8-e6e3de475414.

**Housing Assistance Mortgage Insurance for Disaster Victims Section 203(h)**
U.S. Department of Housing and Urban Development (HUD), Federal Housing Administration (FHA)

**DESCRIPTION:** Provides Federal Housing Administration (FHA) insurance to disaster survivors who have lost their homes and wish to rebuild or buy another home. Borrowers are eligible for 100 percent financing, including closing costs. No down payment is required. Borrowers pay closing costs and prepaid expenses.

Borrowers pay an up-front insurance premium (which may be financed) at the time of purchase, as well as monthly premiums that are added to the regular mortgage payment.

The program is intended to serve low- and moderate- income people, so FHA sets a mortgage limit that varies over time and by location. The mortgage limit can be calculated at at entp.hud.gov/idapp/html/hicostlook.cfm. HUD, Mortgage Insurance for Disaster Victims Section 203(h), hud.gov/program_offices/housing/sfh/ins/203h-dft.
ELIGIBLE IMMIGRATION STATUS: Lawful permanent residents (LPRs) are eligible on the same terms and conditions as U.S. citizens. FHA will insure mortgages for other non-citizens with “lawful residency” provided that the:

- Property will be the borrower’s principal residence;
- Borrower has a valid Social Security Number; and
- Borrower is eligible to work in the United States, as evidenced by an Employment Authorization Document (EAD) issued by U.S. Citizenship and Immigration Services (USCIS). If the EAD will expire within one year and a prior history of residency status renewals exists, the lender may assume that continuation will be granted. If there are no prior renewals, the lender must determine the likelihood of renewal, based on information from USCIS.

An EAD is not required for borrowers residing in the U.S. by virtue of refugee or asylee status granted by USCIS. However, documentation substantiating the refugee or asylee status must be obtained.

Note: The Social Security card cannot be used as evidence of immigration or work status.


LINKS TO APPLY/NEXT STEPS: Applications are made through an FHA-approved lending institution. Link to Lender List Search page: hud.gov/program_offices/housing/sfh/lender/lenderlist.

For more information:
- Contact the FHA Resource Center, hud.gov/program_offices/housing/sfh/fharesourcectr; and
- Contact a HUD-approved housing counseling agency for assistance with disaster-related issues at (800) 569-4287 or apps.hud.gov/offices/hsg/sfh/hcc/hcs.cfm.

HUD, Mortgage Insurance for Disaster Victims Section 203(h), hud.gov/program_offices/housing/sfh/ins/203h-dft.
**203(k) Rehabilitation Mortgage Insurance**  
U.S. Department of Housing and Urban Development (HUD), Federal Housing Administration (FHA)

**DESCRIPTION:** Enables disaster survivors to either:
1. Get a single mortgage to buy or refinance a home and the cost of its rehabilitation, or
2. Finance the rehabilitation of their existing home.

For smaller repairs or rehabilitation, up to $35,000, applicants may be able to get a Limited 203(k). This is for work that doesn't require them to buy or refinance the property. For more detail see hud.gov/program_offices/housing/sfh/203k/203k--df.


**ELIGIBLE IMMIGRATION STATUS:** Lawful permanent residents (LPRs) are eligible on the same terms and conditions as U.S. citizens. FHA will insure mortgages for other non-citizens with “lawful residency” provided that the:
- Property will be the borrower’s principal residence;
- Borrower has a valid Social Security Number; and
- Borrower is eligible to work in the United States, as evidenced by an Employment Authorization Document (EAD) issued by U.S. Citizenship and Immigration Services (USCIS). If the EAD will expire within one year and a prior history of residency status renewals exists, the lender may assume that continuation will be granted. If there are no prior renewals, the lender must determine the likelihood of renewal, based on information from USCIS.

An EAD is not required for borrowers residing in the U.S. by virtue of refugee or asylee status granted by USCIS. However, documentation substantiating the refugee or asylee status must be obtained.

Note: The Social Security card cannot be used as evidence of immigration or work status.


**LINKS TO APPLY/NEXT STEPS:** Applications must be submitted through an FHA-approved lender.

HUD, 203(k) Rehab Mortgage Insurance, hud.gov/program_offices/housing/sfh/203k/203k--df.
Home and Property Disaster Loans
U.S. Small Business Administration (SBA)

**DESCRIPTION:** Homeowners may borrow up to $200,000 for repair or replacement of a primary residence. Homeowners or renters may borrow up to $40,000 for repair or replacement of household and personal effects.

13 C.F.R. § 123.105(a); SBA, Disaster Loan Assistance: Home and Personal Property Loans, disasterloan.sba.gov/ela/Information/HomePersonalPropertyLoans.

**ELIGIBLE IMMIGRATION STATUS:** Unclear. The regulations at 13 C.F.R. § 123 do not refer to eligibility based on citizenship or immigration status.

However, Ann Roche called the SBA Disaster Hotline in November 2017 and was told that only citizens are eligible because the loan is administered by the federal government. The SBA representative could not refer to any statutes, regulations, policy, guidelines, or other written materials to support this assertion, even when pressed.

Note: The application requires a SSN, asks whether the applicant is a citizen (yes or no), and requires applicants to explain on a separate page if “no.” U.S. Small Business Administration Disaster Home Loan Application 3, disasterloan.sba.gov/ela/Documents/Disaster%20Home%20Loan%20Application%20(SBA%20Form%20SC).aspx.

**LINKS TO APPLY/NEXT STEPS:** After registering with FEMA:
- Apply online at disasterloan.sba.gov/; or
- Mail completed applications to:
  - Processing and Disbursement Center
  - 14925 Kingsport Road
  - Fort Worth, TX 76155; or
- Apply in person at any FEMA-State Disaster Recovery Center or SBA Disaster Loan Outreach Center. For assistance with finding a location nearby or help applying by mail, contact the SBA Customer Service Center at 1-800-659-2955 or by email at DisasterCustomerService@sba.gov.


SBA reviews applications and credit histories, estimates the physical damage, and assigns a loan officer and case manager to work with applicants.
Federal Assistance to Individuals and Households Program (IHP) - Other Needs Assistance (ONA)

**DESCRIPTION:** Provides money, up to the program maximum, for necessary expenses and serious needs, not housing related, that can’t be met through other means.

Other needs assistance under IHP includes:
- Personal property
- Childcare
- Medical and dental expenses
- Funeral expenses
- Moving and storage expenses
- Transportation

42 U.S.C. § 5174(e); 44 C.F.R. § 206.119; FEMA, FP 104-009-03, Individual and Households Program Unified Guidance (IHPUG) 6 (2016), fema.gov/media-library-data/1483567080828-1201b6eebf9fbbbd7c8a070fd4b308971/FEMAIHPUG_CoverEdit_December2016.pdf [hereinafter IHPUG]

**ELIGIBLE IMMIGRATION STATUS:** The applicant or an adult household member must be a U.S. citizen, a non-citizen national, or a qualified alien. In addition, the parent or legal guardian of a minor child who meets the criterion can apply for assistance on behalf of the child as long as they live in the same household. The parent or legal guardian must register as the co-applicant. Individuals self-certify their citizenship status on a Declaration and Release form (FEMA Form 009-0-3) that asks applicants to declare, under penalty of perjury, that they have an eligible status. IHPUG 11-12.

See FEMA, FEMA Citizenship/Immigration Requirements, fema.gov/faq-details/FEMA-Citizenship-Immigration-requirements-1370032118159 (last updated Dec. 2, 2015) (“[U]ndocumented individuals can apply [for IHP] on behalf of a minor child who is a citizen and has a social security number. ... If you cannot sign the Declaration and Release [form stating that you are a U.S. Citizen, Non-Citizen National, or a Qualified Alien], another adult household member who is eligible can sign it and no information regarding your status will be gathered.”).

**LINKS TO APPLY/NEXT STEPS:** Options to apply include:
- disasterassistance.gov;
- Downloading the FEMA application for smartphones at fema.gov/mobile-app or their mobile provider’s application store;
- Calling 800-621-3362;
- Visiting a Disaster Recovery Center (DRC) in person; or
- Applying in person with Disaster Survivor Assistance (DSA) Teams, which FEMA sends into affected communities.
Disaster Unemployment Assistance (DUA)
FEMA; administered by the U.S. Department of Labor (DOL)

**DESCRIPTION:** Provides unemployment benefits and reemployment services to individuals who have become unemployed as a result of a Presidential disaster declaration and are ineligible for regular state unemployment insurance.

Benefits are paid for up to 26 weeks beginning with the first week following the date the major disaster began, as long as the individual’s unemployment continues to be a direct result of the disaster.

FEMA, Fact Sheet: Disaster Unemployment Assistance (Aug. 9, 2017), fema.gov/media-library-data/1502303598195-3dc608049769c5e1e928cbbb5c3077af/FACTSHEETDisasterUnemployment.pdf.

**ELIGIBLE IMMIGRATION STATUS:** Only U.S. citizens, U.S. nationals, and qualified aliens are eligible.

FEMA, Fact Sheet: Disaster Unemployment Assistance (Aug. 9, 2017), fema.gov/media-library-data/1502303598195-3dc608049769c5e1e928cbbb5c3077af/FACTSHEETDisasterUnemployment.pdf.

**LINKS TO APPLY/NEXT STEPS:** In the event of a disaster, the affected state will publish announcements about the availability of DUA. To file a claim, individuals who are unemployed as a direct result of the disaster should contact their State Unemployment Insurance agency. Individuals who have moved or have been evacuated to another state should also contact the state agency. Please see: twc.state.tx.us/jobseekers/disaster-unemployment-assistance for more detail in determining eligibility.

- TWC Unemployment Benefit Services website: apps.twc.state.tx.us/UBS/changeLocale.do?language=en&country=US&page=/security/logon.do; or
- Call a Tele-Center at 800-939-6631.

If your IRS taxpayer address of record is in a disaster area declared for FEMA IA, your tax account is auto-coded for the filing and payment relief.

Use to report a gain or deductible loss: irs.gov/pub/irs-pdf/f4684.pdf
**Disaster Assistance and Emergency Relief Program for Individuals and Businesses**  
U.S. Department of the Treasury, Internal Revenue Service (IRS)

**DESCRIPTION:** Special tax law provisions may help taxpayers and businesses recover financially from the impact of a disaster, especially when the federal government declares their location to be a major disaster area. Depending on the circumstances, the IRS may grant additional time to file returns and pay taxes. Both individuals and businesses in a federally declared disaster area can get a faster refund by claiming losses related to the disaster on the tax return for the previous year, usually by filing an amended return. 26 U.S.C. § 7508A; IRS, Disaster Assistance and Emergency Relief for Individuals and Businesses, irs.gov/businesses/small-businesses-self-employed/disaster-assistance-and-emergency-relief-for-individuals-and-businesses-1 (Sept. 29, 2017).

Casualty losses are deductible during the taxable year that the loss occurred. A casualty is the damage, destruction, or loss of property resulting from an identifiable event, including a natural disaster. For detailed information about the tax treatment of casualty losses, see IRS Publication 547 at irs.gov/publications/p547#idm140719118413184.

**ELIGIBLE IMMIGRATION STATUS:** N/A.

The term “taxpayer” means any person subject to any internal revenue tax. 26 U.S.C. § 7701(a)(14).

**LINKS TO APPLY/NEXT STEPS:** If your IRS taxpayer address of record is in a disaster area declared for FEMA IA, your tax account is auto-coded for the filing and payment relief.

Use to report a gain or deductible loss: irs.gov/pub/irs-pdf/f4684.pdf

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**Business Disaster Loans**  
US Small Business Administration (SBA)

**DESCRIPTION:** SBA offers low-interest, fixed-rate loans to small businesses to help them recover from economic injury caused by disasters. 13 C.F.R. § 123.2.

Loans (for physical and economic injury) may not exceed the lesser of the uncompensated physical loss and economic injury or $2 million. SBA may waive the $2 million limitation if a business is a major source of employment in the disaster area. 13 C.F.R. § 123.202.

SBA announces interest rates for physical disaster business loans with each disaster declaration. If a business has credit elsewhere, its interest rate is set by a statutory formula, but will not exceed 8% per annum. If a business does not have credit elsewhere, its interest rate will not exceed 4% per annum. The maturity of the loan depends on the business’ repayment ability, but cannot exceed seven years if it has credit elsewhere. 13 C.F.R. § 123.203(a).
An economic injury disaster loan will have an interest rate of 4% per annum or less. 13 C.F.R. § 123.302.

**ELIGIBLE IMMIGRATION STATUS:** Unclear. The regulations at 13 C.F.R. § 123 do not refer to eligibility based on citizenship or immigration status.

However, Ann Roche called the SBA Disaster Hotline in November 2017 and was told that only citizens are eligible because the loan is administered by the federal government. The SBA representative could not refer to any statutes, regulations, policy, guidelines, or other written materials to support this assertion, even when pressed.

Based on this information, all owners of 20% or more of the business (who must be listed as part of the application) must be U.S. Citizens.

The application requires a SSN, asks whether the applicant is a citizen (yes or no), and requires applicants to explain on a separate page if "no."

**LINKS TO APPLY/NEXT STEPS:**
Apply:
• Online: disasterloan.sba.gov/ela
• In-person at a disaster center; or
• By mail.

APPENDIX C
HUMANITARIAN ACTION PLAN CONTRIBUTORS

Thank you to all who shared their time, experience, and expertise to inform this report.

**Air Alliance Houston**; airalliancehouston.org
Air Alliance Houston is a nonprofit organization that believes everyone has a right to breathe clean air and where you live, work, learn, and play should not determine your health. We are committed to delivering clean air for a healthy future in Houston through applied research, education, and advocacy.

**The Alliance**; thealliancetx.org
We work to create opportunities for refugees, immigrants, and underserved residents to achieve their goals for self-sufficiency and improve their quality of life.

**The American Red Cross**; redcross.org/local/texas/gulf-coast/about-us/locations/houston.html
The American Red Cross of Greater Houston provides service in the following main areas: disaster relief and preparedness education; assistance for military personnel, veterans and their families; health and safety courses; transportation of seniors and the chronically ill to critical medical appointments; and the distribution of life-saving blood products to 15 Houston area hospitals.

**BakerRipley**; bakerripley.org
At BakerRipley, we connect low-income families and individuals to opportunity so they can achieve the life they've imagined. We believe that our neighborhoods are bridges to opportunity, that people can transform communities and that everyone everywhere has something to contribute.

**Boat People SOS**; bpsos.org/bpsos-houston
Boat People SOS- Houston (BPSOS), a non-profit social and legal services provider whose purpose is to empower, organize, and equip immigrant communities in their pursuit of liberty and dignity provides education, information, and direct assistance to immigrant and refugee families on potential health and legal issues prevalent in the immigrant communities.

**Bonding Against Adversity**; bondingagainstadversity.org
Bonding Against Adversity was created as a non-profit in Texas to help the economic development in the East and the Aldine Greenspoint area by providing free and low-cost community outreach programs for disadvantaged residents with an emphasis on healthy living, safe living and reducing secondary school dropout rates.

**Busy Bee Wellness Center**; mybbwc.org/index.html
Bee Busy Wellness Center is a Federally Qualified Health Center providing the highest quality of health care. All our services are offered to all our patients, without regard to ability to pay. We are committed to the health and wellness of all our patients and our community.
Casa Juan Diego; cjd.org
Casa Juan Diego was founded in 1980, following the Catholic Worker model of Dorothy Day and Peter Maurin, to serve immigrants and refugees and the poor. From one small house it has grown to ten houses.

Catholic Charities; catholiccharities.org
For 75 years, Catholic Charities has provided food, clothing, shelter and a network of support services to people of all ages and from all walks of life and religious backgrounds. We also promote social justice, serving as a voice for the poor and vulnerable. Annually, we provide help and create hope for more than 85,000 people as they create better lives for themselves and their families.

Chinese Community Center; ccchouston.org
Established in 1979 as a Chinese language school, the Chinese Community Center (CCC) has played a leading role in welcoming newcomers to America and in creating opportunities for everyone to contribute to the Houston community. Our Center serves over 10,000 families annually.

City of Houston: Houston Health Department; houstontx.gov/health/
The mission of the Houston Health Department is to work in partnership with the community to promote and protect the health and social well-being of Houstonians and the environment in which they live.

City of Houston: Housing and Community Development Dept; houstontx.gov/housing/
The City of Houston's Housing and Community Development Department (HCDD) provides the leadership and financing to make affordable homes and neighborhood revitalization happen. From investing in neighborhood parks, multifamily communities and economic development, to providing first-time homebuyer assistance and funds to serve the homeless, elderly and disabled -- HCDD works to improve the quality of life for Houston's neighborhoods and families.

City of Houston: Office of Emergency Management; houstonoem.org
Our mission is to provide programs and activities to City residents and departments to help them prepare for, cope with and recover from the effects of natural and man-made disasters. We do this through all four phases of emergency management: preparedness, response, recovery and mitigation.

City of Houston: Office of New Americans and Immigrant Communities; houstontx.gov/na/index.html
The Office of New Americans and Immigrant Communities reaches out to Houston's diverse community of immigrants, ex-patriates and refugees to facilitate their successful civic, economic and cultural integration as members of our community. By partnering with stakeholders and community-based organizations to offer programs, services, and signature events, the Office of New Americans seeks to build the capacity of Houston to welcome and integrate its diverse citizenry.

Daya; dayahouston.org
In 1996, seven women – all immigrants to the United States – founded Daya, a compassionate and culturally sensitive organization for South Asian women affected by domestic violence. The first step was establishing a volunteer helpline to support the women in their community, and with that Daya was born.
Epiphany Community Health Outreach Services (ECHOS); echos-houston.org
Epiphany Community Health Outreach Services (ECHOS) is a non-profit organization connecting people in need with the health, social and educational resources that can improve their lives. Our vision is a community where all people can have access to resources needed to build a healthy and productive life.

Fe y Justicia Worker Center; houstonworkers.org
The Fe y Justicia Worker Center exists because we believe everyone should have a safe and healthy workplace, and we believe in working-class people’s collective power to create change. The FJWC has been the premier worker rights community organization in Houston for twelve years. We are dedicated to creating positive change with and for low-wage workers by leading research, providing services, building peer support networks, and mobilizing campaigns.

Greater Houston Community Foundation; ghcf.org
Our business is helping donors create lasting legacies and meaningful impact. Greater Houston Community Foundation offers a variety of tools and expertise to amplify the positive impact donors and their gifts can have across the Houston area and beyond.

Harris County Office of Homeland Security and Emergency Management; hcohsem.org
Vision and Mission: The Harris County Office of Homeland Security and Emergency Management (HCOHSEM) will be a national model of “best practices” in emergency planning, preparation, response and recovery. HCOHSEM will help prepare, safeguard and protect the residents and property of Harris County from the effects of disasters through effective planning, preparation, response and recovery activities.

Harris County Public Health; publichealth.harriscountytx.gov
Harris County Public Health (HCPH) is the county health department for Harris County and provides comprehensive health services and programs to the community through a workforce of approximately 700 public health professionals – all dedicated to improving the health and well-being of Harris County residents and the communities in which they live, learn, work, worship, and play. The HCPH jurisdiction included approximately 2.3 million people and over 30 other municipalities located in Harris County (not including the city of Houston).

Houston Area Women’s Center; hawc.org
The Houston Area Women’s Center works to end domestic and sexual violence and supports all in building safe and healthy lives through advocacy, counseling, education, shelter and support services. Our services are free, confidential and available to everyone.

Houston In Motion; houstoninmotion.org
Houston residents are working to create a new standard for welcoming migrants to our city. We are working with organizations across Houston to connect them with critically needed volunteers and support.
Houston Volunteer Lawyers; makejusticehappen.org
Founded in 1981 by the Houston Bar Association, Houston Volunteer Lawyers has delivered free legal services to low-income residents of Harris County for 35 years by linking qualified applicants with attorneys volunteering their time on a pro bono basis. Houston Volunteer Lawyers helps low-income citizens that other programs often cannot serve, such as those who may not meet the financial criteria of other legal assistance programs and non-US citizens.

Human Rights First; humanrightsfirst.org
Human Rights First is an independent advocacy and action organization that challenges America to live up to its ideals. We believe American leadership is essential in the global struggle for human rights, so we press the U.S. government and private companies to respect human rights and the rule of law.

Interfaith Ministries of Greater Houston (IM); imgh.org
Interfaith Ministries for Greater Houston brings people of diverse faith traditions together for dialogue, collaboration, and service, as a demonstration of our shared beliefs. We believe that, through service and dialogue, it is possible for very diverse people to know one another and find common ground, while still embracing our personal beliefs and cultures.

Immigrant residents of the Houston region
Undocumented immigrants gathered over lunch to share their experiences through Hurricane Harvey. With Antena Houston providing language through simultaneous translation, eight women generously discussed the challenges they faced through the storm and recovery.

Kids in Need of Defense (KIND); supportkind.org
KIND staff and our pro bono attorney partners at law firms, corporations, and law schools nationwide represent unaccompanied immigrant and refugee children in their deportation proceedings. Together, we ensure that no child stands in court alone.

Las Americas Newcomer School; houstonisd.org/lasamericas
Las Americas Middle School is a newcomer campus that educates recent immigrant and refugee students who have no or very limited English language proficiency and who often have had a limited formal education in their native countries. Our goals are to help students acquire beginning English skills, provide instruction in core academic content areas, guide student's acculturation into the U.S. school system, and to accelerate the students' learning so they can be prepared for the literacy and content demands of mainstream courses.

Living Hope Wheelchair Association; lhwassociation.org
Living Hope is an independent, non-profit organization serving people with spinal cord injuries as well as with other disabilities so that they may lead full and productive lives. Our group was founded by people with spinal cord injuries, the majority of our members are not entitled to benefits, lack medical insurance, and do not have a stable source of income. We provide services to our members and engage in community advocacy to achieve our goals.
Lone Star Legal Aid; lonestarlegal.org/
Lone Star Legal Aid’s mission is to protect and advance the civil legal rights of the millions of Texans living in poverty by providing free advocacy, legal representation, and community education that ensures equal access to justice.

Memorial Assistance Ministries; maministries.org/
Our mission is to assure that families have the means to meet their basic needs. We offer programs enabling long-term financial self-sufficiency; assist families facing financial crisis avoid homelessness; assure children an improved school experience; facilitate client access to other support networks; and provide value to our member congregations and the community

The Aftermath Pop Up; m.facebook.com/1958784817724750
A group of grassroots organizers who came together after Harvey to connect disenfranchised communities on the Eastside of Houston with response and recovery resources. Continuing to serve those still in crisis and with long-term recovery needs.

Refugee and Immigrant Center for Education and Legal Services (RAICES); raicestexas.org
Founded in 1986 as the Refugee Aid Project by community activists in South Texas, RAICES has grown to be the largest immigration legal services provider in Texas. With offices in Austin, Corpus Christi, Dallas, Fort Worth, Houston and San Antonio, RAICES is a frontline organization in the roiling debate about immigration and immigrants in the world.

Refugee Services of Texas; rstx.org/
Guided by the principles of human compassion and dignity, Refugee Services of Texas welcomes refugees, immigrants, and other displaced peoples and supports them in integrating and thriving in their new communities. RST provides services to hundreds of refugees, asylees, survivors of human trafficking, and related vulnerable populations from over 30 different countries of origin each year.

Tahirih Justice Center; tahirih.org/
The Tahirih Justice Center is a national non-profit committed to serving as many immigrant women and girls as possible. Our award-winning approach to ending gender-based violence provides direct services, policy advocacy, and training and education. Tahirih protects immigrant women and girls and promotes a world where they enjoy equality and live in safety and dignity.

Texas Organizing Project (TOP); organizetexas.org/
The Texas Organizing Project (TOP) works to improve the lives of low-income and working class Texas families through community organizing, and civic and electoral engagement. TOP is a membership-based organization that conducts direct action organizing, grassroots lobbying and electoral organizing led by working families in Texas.
Texas Rio Grande Legal Aid (TRLA); trla.org/
TRLA provides free civil legal services to residents in 68 Southwest Texas counties. Our attorneys specialize in more than 45 practice areas, including family, employment, foreclosure, bankruptcy, subsidized housing, farmworker, civil rights, and environmental law. TRLA is funded principally by Legal Services Corporation and Texas Access to Justice Foundation (TAJF).

United Way of Greater Houston; unitedwayhouston.org/
At the heart of our work is ensuring the safety net by providing life-saving services to meet our neighbors' most basic needs. We support families and individuals through crises. We create a pathway to self-sufficiency and success for our neighbors and our community. And, we bring stakeholders and our community together to address the most pressing needs in our area.

United We Dream; unitedwedream.org/
We are the largest immigrant Youth-led community in the country. We empower people to develop their leadership, their organizing skills, and campaigns to fight for justice and dignity for immigrants and all people. This is achieved through immigrant youth-led campaigns at the local, state, and federal level.

University of Houston Law Center Immigration Clinic; law.uh.edu/clinic/immi.asp
The Immigration Clinic at the University of Houston Law Center specializes in handling applications for asylum on behalf of victims of torture and persecution; in representing immigrants who have been the victims of domestic violence, human trafficking and crime; and children and those fleeing civil war, genocide or political repression. Students also give presentations to outside organizations that deal with Immigrant Issues and give individual assistance to immigrants held in immigration detention centers.

West Street Recovery; weststreetrecovery.org/
West Street Recovery (WSR) is a horizontally organized grassroots organization which aims to use Harvey Recovery to build community power. Our driving principle is to work together with community members, not for them, or on their behalf. Our work is rooted in an understanding that certain communities were disproportionately impacted by Harvey because they lack access to resources and power, and that the same actors and forces which produced these inequities cannot be expected to adequately support communities in recovery. We believe that the communities who were most harmed by Harvey are the people who best understand what can protect them in the future.

YMCA International Services; ymcahouston.org/locations/ymca-international
YMCA International’s Refugee Resettlement program assists refugees who are forcibly displaced from their native countries due to persecution based on their race, religion, ethnicity, political opinion or their belonging to a particular social group. Our Refugee Employment Department works with employers in the Houston area to fill staffing needs from our qualified pool of refugee candidates. The Trafficked Persons Assistance Program works to identify and assist foreign and domestic victims of human trafficking. Immigration legal services provide counseling or representation to individuals seeking immigration assistance, including family reunification visas, adjustment of status and naturalization applications.
APPENDIX D
FAQ FOR IMMIGRANT SURVIVORS OF HARVEY

The following is the table of contents from HILSC’s FAQ created for Hurricane Harvey first responders regarding immigration in August/September 2017. The original document was a Google Doc, easily editable in real time as the information was unfolding. When the HILSC response is triggered for future disasters, HILSC will update this FAQ with relevant questions and answers specific to the current disaster and distribute to shelters, the Immigrant Rights Hotline, and non-profit partners. The section on policy and legal updates will be updated according to the most recent issues. For a copy of the original FAQ from Harvey, please email info@houstonimmigration.org.

FAQ for Immigrant Survivors of Harvey
This guide is intended as a resource for organizations answering client questions and for volunteers answering questions via the Immigrant Rights Hotline.

This FAQ is a guide. If you don't know how to answer a question, either respond: "I'm a volunteer and while I don't know, we are updating our information regularly so please call (come) back later"; or conduct a Google search. Please add suggested additions to this FAQ via comments.

We want the immigrant community to know that they have power to make change. If you get the impression that a caller wants to get more involved, encourage them to organize with other immigrants.

Harvey: Emergency Relief Access for Immigrants
1. Is it safe for me to go to a shelter/food bank/evacuation site if I'm undocumented?
2. What is the process for working with FEMA? What can I expect?
3. Where can I get legal assistance with emergency relief paperwork (e.g. FEMA)?
4. Who is eligible, or a “qualified immigrant”, for federal FEMA emergency relief purposes?
5. Will undocumented immigrants negatively impacted by asking for FEMA relief?
6. Where can I get food?
7. Is ICE conducting enforcement efforts (raids/arrests) as a part of Harvey relief?
8. Will accepting disaster relief affect my application for permanent residence or for a visa?
9. I am a foreign student whose financial support has been affected by disaster. Can I get help?
10. I have a loved one detained, I'm concerned for their safety during the hurricane and I have lost communication. How can I find out if they've been transferred or deported?

Harvey: General questions
11. How can I find out about my car or get it towed?
12. I cannot work due to the Hurricane and need unemployment - what do I do?
Immigration Courts and Documents
13. What can I do if I've lost all of my paperwork?
14. When will the immigration courts / USCIS/ ICE reopen?
15. What do I do if I missed an appointment or deadline?
16. How can I find out if my appointment will be rescheduled?
17. What about other state court closures?
18. I had to move. How do I change my address with immigration?
19. I have an ankle monitor but have not been able to charge it - what should I do?

Policy and Legal Updates (SB4 / DACA)
20. What is happening with SB4?
21. What is happening with DACA?
## APPENDIX E

### DISPERSED FUNDS FROM HILSC

<table>
<thead>
<tr>
<th>Organization</th>
<th>Total</th>
<th>Est # of people will be served</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al-Noor Society of Greater Houston</td>
<td>$42,000</td>
<td>20</td>
<td>To support undocumented and low-income clients who were impacted by Hurricane Harvey through rental assistance and other basic needs.</td>
</tr>
<tr>
<td>Daya</td>
<td>$42,000</td>
<td>60</td>
<td>To provide trauma-informed, culturally competent services and financial assistance for short-term rental assistance, utilities, groceries, personal items, furniture, transportation, car repairs, gasoline, medical costs, childcare, and emergency hotel accommodation to immigrant survivors of domestic violence who were impacted by Hurricane Harvey.</td>
</tr>
<tr>
<td>Fe y Justicia Worker Center</td>
<td>$20,000</td>
<td>16</td>
<td>To provide direct assistance, including housing, medical bills, food, personal items, transportation, mental health, or immigration legal services, to immigrant workers who were impacted by Harvey; and to support a resiliency and vicarious trauma training for staff and allies.</td>
</tr>
<tr>
<td>Kids Need of Defense (KIND)</td>
<td>$10,000</td>
<td>20</td>
<td>To provide direct financial assistance for court costs/fees, mental health, transportation, and other basic needs to immigrant children who are in immigration proceedings and who were impacted by Hurricane Harvey.</td>
</tr>
<tr>
<td>Living Hope Wheelchair Association</td>
<td>$24,000</td>
<td>100</td>
<td>To support immigrant clients impacted by Hurricane Harvey with direct assistance for housing and shelter repairs, rental assistance, medical needs, food, and transportation. Funding is also to be used to support mental health workshops in Spanish for staff, members and leaders.</td>
</tr>
<tr>
<td>West Street Recovery</td>
<td>$47,000</td>
<td>45</td>
<td>To provide direct assistance to undocumented and mixed status households still recovering from Harvey and in need of building materials, safety equipment, contractors, and case management.</td>
</tr>
<tr>
<td>The Alliance</td>
<td>$15,000</td>
<td>60</td>
<td>To provide mental health care and self-care support to The Alliance staff who work with clients who were directly impacted by Hurricane Harvey.</td>
</tr>
<tr>
<td>Equal Justice Works</td>
<td>$575,872</td>
<td>500</td>
<td>To support two-year immigration legal fellows as part of the Disaster Recovery Legal Corps at Tahirih Justice Center, Human Rights First, Catholic Charities, and YMCA International Services.</td>
</tr>
</tbody>
</table>
APPENDIX F
IMMIGRANT ACCESSIBILITY INDEX

This tool is for social services agencies to assess how accessible their services are to immigrants, regardless of legal status. The questions point to best practices and help identify opportunities to make services more accessible.

1. Nearly 1.6 million residents of the greater Houston region are foreign-born; 33% are naturalized citizens; 30% are undocumented (506,000) and 32% are legal permanent residents. Nearly 50% of Houston-area legal permanent residents (green card holders) and undocumented folks speak English “not well or at all.” In 2017 (or most recent year for which you have data), what percentage of your clients were:
   • Non-US citizens: ___________%
   • Foreign-born: ___________%
   • Limited English proficiency: ___________%

ELIGIBILITY

2. Some agencies, due to funding or policy restrictions, are unable to serve individuals who are not US-citizens. Please check all types of immigration status your organization serves:
   - U.S. Citizen
   - Legal Permanent Resident (LPR or “green card” holder)
   - Temporary Work permit (e.g. DACA, Temporary Protected Status, etc)
   - Non-immigrant Visa (e.g. tourist, visitor, medical, business, temporary work, student)
   - Immigrant Visa (e.g. refugees, asylees, family, employer, religious, and diversity)
   - Status in process (pending ICE process/USCIS petition), approved but not yet received Visa
   - Undocumented

3. Non-citizens may not have US or government issued identification. Please check all types of ID your organization accepts, current and/or expired:

   CURRENT       EXPIRED       ID TYPE
   □             □             US government-issued ID (state driver’s license, state ID, work permit, green card)
   □             □             Any non-government photo ID (school, work)
   □             □             Foreign-government issued ID (passports, matriculas, country IDs)
   □             □             Visas (immigrant or non-immigrant)
   □             □             Any government-issued, non-photo documents (birth, marriage certificate, social security card)
   □             □             Open to alternative evidence (ICE detention ID, Office of Refugee Resettlement ID, agency letter, affidavit from agency or another person, witness statement, federal benefits documents- TANF, SNAP, Medicaid, school/work ID, or membership cards)
   □             □             Other: ____________________________________________
4. Providing proof of residence/address at an address is often very difficult for families that are very low-income, or without legal status. Is proof of residence/address required and what types are accepted?

☐ No, we do not require proof of residence.

Yes, we require proof of residence and will accept (please check all that apply):

☐ Lease
☐ Bill
☐ Bank statement
☐ Benefits document
☐ Immigration documents
☐ Check stubs
☐ School records
☐ First class mail
☐ Verification/support letter from the person providing shelter assistance for the client.
☐ Verification/support letter from another agency that serves the client.
☐ Other: ________________________________________________________________

LANGUAGE ACCESSIBILITY

Many immigrants in the greater Houston region have limited English proficiency (LEP) and/or are illiterate. These questions are geared at assessing how accessible your services are to those clients.

5. What languages are frontline staff proficient in, other than English?

☐ Spanish
☐ Vietnamese
☐ Chinese
☐ Arabic
☐ French
☐ Other: ________________________________________________________________

6. What languages are program staff proficient in, other than English?

☐ Spanish
☐ Vietnamese
☐ Chinese
☐ Arabic
☐ French
☐ Other: ________________________________________________________________

7. What languages are eligibility/billing staff proficient in other than English?

☐ Spanish
☐ Vietnamese
☐ Chinese
☐ Arabic
☐ French
☐ Other: ________________________________________________________________
8. Relying on family members (particularly children) to provide interpretation for LEP clients is not ideal, particularly in providing healthcare, legal services, or other situations in which a client may need to discuss sensitive information.

Does your organization use an interpretation provider or language line service, as an alternative to family or community members providing interpretation for non-English speaking clients? *(Check all that apply.)*

- [ ] Yes, for frontline staff
- [ ] Yes, for program staff
- [ ] Yes, for eligibility/billing staff
- [ ] No, interpretation is not available

9. What interpretation or language line service does your organization use most often?

_______________________________________________________________________________

10. Which languages do you most often interpret?

- [ ] English
- [ ] Spanish
- [ ] Vietnamese
- [ ] Chinese
- [ ] Arabic
- [ ] French
- [ ] Other: ____________________________________________

11. What languages are your printed materials and website available in? *(Check all that apply.)*

<table>
<thead>
<tr>
<th>MATERIALS</th>
<th>WEBSITE</th>
<th>LANGUAGE</th>
</tr>
</thead>
<tbody>
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<td>□</td>
<td>□</td>
<td>French</td>
</tr>
<tr>
<td>□</td>
<td>□</td>
<td>Other:</td>
</tr>
</tbody>
</table>

12. Does your organization use visual aids or other tools for low-literacy clients and/or children?

- [ ] No
- [ ] Yes

If yes, please share your best practices: _____________________________________________

**POLICY AND PRACTICE**

These questions are about creating safe spaces for immigrant clients, both emotionally, and physically.

13. Do you have processes and procedures in response to Immigration and Customs Enforcement (ICE) if they come to your agency to arrest an individual or gain access to your agencies’ client data?

- [ ] Yes, we have a policy
  - [x] We are willing to share our policy with peer organizations to learn from.
- [ ] No, we don’t have a policy currently
  - [ ] We are interested in receiving more information about implementing a policy.
14. Does your ICE response policy change during a natural disaster, such as Hurricane Harvey?

☐ Yes

If yes, please explain how: __________________________________________________________

☐ No

☐ N/A, we don’t have an ICE response policy.

15. Do you have a diversity and inclusion policy?

☐ Yes, we have a diversity and inclusion policy

☐ We are willing to share our policy with peer organizations to learn from.

☐ No, we don’t have a policy currently

☐ We are interested in receiving more information about implementing a policy.

16. Does your organization have a client confidentiality waiver that ensures that client data will not be shared with any outside entities, including government agencies?

☐ Yes, we have a policy

☐ We are willing to share our policy with peer organizations to learn from.

☐ No, we don’t have a policy currently

☐ We are interested in receiving more information about implementing a policy.

17. Does your organization offer trauma-informed training to any of the following staff? *(Check all that apply.)*

<table>
<thead>
<tr>
<th>OPTIONAL</th>
<th>REQUIRED</th>
</tr>
</thead>
<tbody>
<tr>
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<td>☐ Management</td>
<td></td>
</tr>
<tr>
<td>☐ Board</td>
<td></td>
</tr>
<tr>
<td>☐ Other: ____________________________________________</td>
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</tr>
</tbody>
</table>

18. Does your organization offer trauma-informed services?

☐ Yes, we have a defined policy for trauma-informed.

☐ Yes, in practice but not policy.

☐ No, but we would like to learn more about what it means to be trauma-informed

☐ No
OPERATIONS

This section includes questions about accessibility of services more broadly, not just for immigrants. For all types of low-income or vulnerable clients who often don’t have easy access to transportation or much flexibility in their schedules, not just those who are immigrants. Approximately 45% of the Houston area foreign-born population has family incomes under 200% of the poverty line.

19. Is an appointment required for first-time service seekers?
   - No, walk-ins are accepted during business hours.
   - No, walk-ins are accepted during certain days/hours.
   - Yes, an appointment is required for intake.

Please describe process: ______________________________________________________

20. Are services provided on the same day as intake?
   - Yes, services are provided same day as intake.
   - Yes, but must be requested when making appointment.
   - No, services are offered after completion of intake, on a separate day.

21. To overcome access barriers, does your organization offer any of the following? (Check all that apply)
   - Intake over the phone
   - Services over the phone
   - Services at client’s home or other remote location

Other: ______________________________________________________________________

22. Are services available other than normal business hours? (Check all that apply.)
   - Yes, early morning hours
   - Yes, evening hours
   - Yes, weekend hours
   - No, services are only available M-F during standard business hours.

23. Does your organization offer clients’ assistance in filling out forms?
   - Yes, we help clients fill out forms for our services.
   - Yes, we connect clients with volunteers to assist with their forms.
   - Yes, we explain forms and answer questions, but the client is expected to fill out the forms on their own or with outside assistance.
   - No, we do not help clients fill out forms. They are expected to get assistance outside of our office/program from family, friends, or community members.
24. Does your organization have accommodations for clients with children?

- [ ] Yes, children can stay with clients during services.
- [ ] Yes, childcare is offered.
- [ ] Yes, other: ____________________________________________
- [ ] No

Notes: ___________________________________________________

If you’d like your information to be included in your NeedHOU listing’s Immigrant Accessibility Profile, please complete the following information and return to: katy@houstonimmigration.org.

Organization name:
Person completing the form:
Contact information:

This tool was developed by members of Houston Immigration Legal Services Collaborative, a consortium of organizations serving low-income immigrants without legal status throughout the Houston region.

Questions? Feedback? Email katy@houstonimmigration.org
APPENDIX G

HAP INTERVIEW QUESTIONS

Best Practices in immediate and long-term response
1. Reflecting on your organization’s immediate and long-term response to Hurricane Harvey, what are you especially proud of? What needs were you most surprised by? What needs did you meet that you would have expected?
2. What actions were most helpful to you from HILSC or your fellow immigration legal services providers? What did other organizations step in to provide?
3. What did the city/county/Red Cross/others do well in meeting the needs of immigrants without legal status?

Gaps in Service in immediate and long-term response
4. How about access to services for the myriad needs created or exacerbated by the disaster?
5. What questions did you keep asking but had difficulty finding an answer? Did you find the answers? If so, where? If not, should this be a possibility of a tool to be developed?
6. Are there things such as documents, processes, or information that you wish had been available prior to Harvey?

Barriers to Service in immediate and long-term response
7. What would you do differently next time? Are there opportunities to better meet the needs of individuals and families needing immigration legal assistance during disasters?
8. What role would be most useful for HILSC to take during the next disaster?
9. Do you have examples of how public or private efforts created barriers (intentionally or unintentionally) to immigrants without legal status getting the services they needed?
## Appendix H

### Non-English/ Culturally-Specific Media

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<tr>
<th>Outlet</th>
<th>Language</th>
<th>Media</th>
<th>Website</th>
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<tbody>
<tr>
<td>Bao Tre Magazine</td>
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<td>Magazine</td>
<td>baotreonline.com</td>
</tr>
<tr>
<td>Bilingual Texas Digest</td>
<td>Chinese</td>
<td>Website</td>
<td>translate.google.com/translate?hl=en&amp;sl=zh-TW&amp;u=bilingualtexasdigest.com&amp;prev=search</td>
</tr>
<tr>
<td>Buena Suerte</td>
<td>Spanish</td>
<td>Social media</td>
<td>houston.buenasuerte.com</td>
</tr>
<tr>
<td>Christian Herald</td>
<td>English, serving African Immigrants</td>
<td>Website</td>
<td>mychristianherald.com/</td>
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<td>El Perico</td>
<td>Spanish</td>
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<td>HUMFM 106.1</td>
<td>English, serving South Asian</td>
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<td>India Herald</td>
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<td>india-herald.com</td>
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<td>Indo-American News</td>
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<td>La Informacion</td>
<td>Spanish</td>
<td>Newspaper</td>
<td>laininformacion.us</td>
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<td>La Prensa de Houston</td>
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<td>Newspaper</td>
<td>blog.semananews.com</td>
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<td>La Subasta</td>
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<td>impremedia.newspaperdirect.com/epaper/viewer.aspx</td>
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<td>Saigon Network TV (SGN)</td>
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<td>The Vietnam Post</td>
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<td>Voice of Asia</td>
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<td>voiceofasia.news</td>
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<td>News</td>
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</tbody>
</table>
APPENDIX I
COMMON LEGAL NEEDS AFTER A DISASTER

Short Term 1-6 Weeks after event

Landlord-Tenant questions
Present insurance claims, pro-active steps to maximize coverage, flood insurance
Apply for FEMA assistance (temporary housing, home repair/replacement, other needs)
Apply for SBA Disaster Loans to individuals, Disaster Unemployment
Replace documents (ID, driver license, SS Card, EBT, custody, immigration, deed, etc.)
Apply for or redirect unemployment, TANF, SNAP/Food Stamps, Medicaid, SSI benefits
Wage/Labor Theft Redress
Respond to public agency requests for emergency rule modifications on health, human services, and utility concerns
Ankle-monitor questions
Reschedule missed court appointments
Public Charge questions

Medium Term 1-6 Months after event

Appeal FEMA assistance denials
Renew rent subsidies from either FEMA or HUD
Evictions and private lease termination/repair questions
Utility shutoffs
Security deposits
Displaced public housing participants
Section 8 portability
Mobile home questions
Foreclosure prevention
Clearing property titles
Access to public education while displaced, IDEA and 504 issues
Insurance claim disputes
Consumer price gouging and other scams, including insurance claim scams
Repair contractor scams and disputes
Powers of Attorney to care for a child or elderly person
Guardianships and Supportive Decision Making for those needing
Emergency conservatorships (custody)/Modifications
Modification of parenting orders to reflect new home and school locations
Domestic violence response, including protective orders
Estate planning document replacement

Long Term 6 Months to years after event

Foreclosures
Bankruptcies
Flood Insurance Proof of Loss Preparation and FEMA Flood Directorate Appeals
Defend FEMA Recoupment
Apply for disaster tax relief
Civil and disability rights cases
Legal Counsel for community based organizations on rebuilding plans
Litigation to redress systemic disaster response problems
LL/Tenant Issues concerning repair issues, non-repair, mold concealment, etc.
Disputes regarding home elevation certificates and flood plain zoning
Disputes regarding significant damage determination against homeowners
Public Charge questions
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