



May 25, 2018

To: Puerto Rico CDBG-DR Program, Secretary's Office (via email: infoCDBG@vivienda.pr.gov)

Secretary of Housing and Urban Development, Ben Carson

Assistant Secretary of Housing and Urban Development for Community Planning and Development, Neal J. Rackleff

Assistant Secretary of Housing and Urban Development for Fair Housing and Equal Opportunity, Anna Maria Farias

RE: Request for an accurate translation of PR Hurricane Maria Action Plan

The extensive devastation caused by Hurricane Maria on Puerto Rico battered an already struggling island hampered by a high poverty level and lack of socioeconomic opportunities for the majority of its citizens. The scale of the aftermath of both Hurricane Irma and Hurricane Maria has required and will continue to require massive amounts of support from the federal government, individuals, and organizations from Puerto Rico and beyond. The \$1.5 billion allocation through the Housing and Urban Department (HUD) announced in February will be instrumental to support the recovery of the more than 3 million U.S. citizens that live on the island.

Espacios Abiertos is an independent, non-profit, non-partisan organization founded in 2014 that promotes a more transparent, open, and accountable government in Puerto Rico, through civic engagement, citizen empowerment and participation. We believe in a more democratic, just, and equitable Puerto Rico for all of its citizens.

After hurricanes Irma and Maria hit Puerto Rico, and in collaboration with the Center for a New Economy, out of the unparalleled challenges and necessities faced in the island, Espacios Abiertos took a new role; we started offering communities throughout the island ongoing assistance and immediate humanitarian relief. Leveraging our coordination capabilities, on-the-ground knowledge, strategic support networks in and outside of the island we were able to establish, just a few days after the hurricanes, an island-wide network. Our network consisted of twelve distribution centers with well-established community based organizations that worked independently from the government (local or federal) and worked with an army of local community leaders and volunteers. Through this effort, not only were we the first to deliver basic supplies to many communities, but we were successful in delivering close to 4 million pounds of much needed supplies (water, food and hygiene products) from coast to coast.

Our commitment to rebuilding and retrofitting the physical and socioeconomic infrastructure of Puerto Rico through the engagement of our constituent and partner communities continues to be steadfast. This constituency is comprised primarily by low and medium income (LMI) persons who are Spanish-speaking monolingual and/or have Limited English Proficiency.

According to the American Community Survey (ACS 2012-2016), 94.50% of Puerto Ricans ages 5 and over, speak a language other than English at home. The Disaster Recovery Action Plan Draft for Public Comment (AP) acknowledges that Puerto Rico has residents that are English language limited (see p.30). The document also acknowledges that Spanish is the predominant language in Puerto Rico and it is spoken across the island. Moreover, the Plan clearly shows on a map that across the island the majority speaks English in limited capacity or not at all (see Figure 18, p.33). The AP also recognizes that: “all programs and recovery assistance will need to address this diversity in language to ensure critical assistance information and recovery guidance reaches all residents, especially those with limited English language abilities (p.33).

The government of Puerto Rico has elected to provide citizens a period of 14 days for public comment on the Disaster Recovery Action Plan (AP) for the CDBG-DR funds announced in February 2018. This period began on May 10th, 2018 when the Action Plan was published, in both English and Spanish versions. We have had to rely on the AP Spanish-language translation to assist our partner communities and organizations to develop comments. But, in the course of presenting the AP to them we discovered systemic and significant misinterpretations and mistranslations between the Spanish language and English-language versions of the Action Plan. These issues make the Spanish version incomprehensible to Native Spanish speakers that do not understand or cannot read the English version.

An example of these misinterpretations and mistranslations can be found in page 72 of the Spanish-language AP and in page 65 of the English-language AP. The first two paragraphs of the “Impacto Economico” or the “Economic Impact” section are barely readable and are not easily understood. Sentences such as: “Planificacion económica y estratégica el gasto se asegurar fondos de recuperación inyectados en la economía hoy tengan un impacto duradero” literally translate to: “Economic and strategic planning the expense will ensure funds of recovery injected in the economy today have a lasting impact.” Another sentence in the next paragraph: “El declive de las condiciones económicas en Rico se ha exacerbado por los huracanes Irma y María... En el momento en que Puerto Rico sometía, el desempleo en toda la Isla estaba en un 11%, y gran parte de la atención de Wall Street se había centrado en los acreedores que poseen algunos de los \$74 mil millones de Puerto Rico en deuda pública.” literally translate to: “The slope of the economic conditions in Rico has been exacerbated by the hurricanes Irma and Maria... In the moment in that Puerto Rico submitted, the unemployment in the Island was at 11%, and a great deal of the attention in Wall Street had been centered in the creditors that hold some of the \$74 billion of Puerto Rico in public debt.” These grammatical, syntax, and language errors make this document nearly impossible to read and understand.

Another example can be found in page 59 of the Spanish-language AP section “Necesidades no satisfechas en vivienda” and in page 54 of the English-language AP section “Housing unmet needs”. The AP says: “Programa para Individuos y Familias de FEMA provee asistencia para las reparaciones y sustituciones que harán un hogar ‘habitabile’, mientras que la financiación de préstamos de la SBA premios por el costo total para restaurar una casa.” This literally translates to: “FEMA’s Individual and Family Program provides assistance for the repairs and replacements that will make a home “habitabile,” while the financing of loans of the SBA award



for the total cost to repair a home.” In these sentences, the translation mistakes “SBA awards” for “SBA award;” the intention was to show that the SBA takes an action (award as a verb), whereas the translation shows “award” as a noun with no action. These errors make the document extremely hard or impossible for non-English speaking community persons to understand what the action plan is proposing.

It is clear that the document was originally written in English and then translated into Spanish. The translation is not only faulty, as demonstrated above, but it also fails to take into consideration Puerto Rican terms. For example, in page 72 of the Spanish-language AP and in page 65 of the English-language version, the Fiscal Oversight Board was literally translated as “Consejo de Supervisión Financiera y de Gestión” (Council for Financial Supervision and Management). But, the Puerto Rican people, the media, and government refer to it as “the Board” or “La Junta”, “Fiscal Control Board” or “Junta de Control Fiscal”, “Fiscal Oversight Board” or “Junta de Supervision Fiscal,” never “Consejo”. These are only a couple of the many issues that we have encountered.

Therefore, only those who are fluent in both English and Spanish are able to refer from the Spanish version to the English version and clear up comprehension issues. Most of the Puerto Rican population speakers are not able to understand the background, underpinnings, and the action plan.

Since the discovery of these misinterpretations and mistranslations in the Spanish-language version of the AP in the middle of the public comment period, and without the time or the technical capacity to provide a correct interpretation of the AP, in order to guarantee a process free of obstacles or discrimination:

We respectfully request that:

- 1) A corrected translation, properly interpreting the AP be provided to the citizens of Puerto Rico; and
- 2) The public comment period be suspended until such an accurately translated plan is produced, and the fourteen-day comment period begin again from the date the public is provided with said accurate translation.

Failure to do so will violate Title VI of the Civil Rights Act of 1964 which prohibits discrimination in federal financial assistance on the basis of race, color, or national origin, including limited English proficiency (42 USC 2000d et seq.).

Sincerely,

Cecille Blondet
Executive Director
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