IMPACT LOAN FUND

Impact Loan Fund

Limited English Proficiency Plan

Adopted: May 24, 2024

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I. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address Impact Loan Fund's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

Plan Summary

Impact Loan Fund has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance isavailable.

In order to prepare this plan, the system used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Impact Loan Fund
2. The frequency with which LEP persons come in contact with Impact Loan Fund's services.
3. The nature and importance of services provided by Impact Loan Fund to the LEP population.
4. The interpretation services available to Impact Loan Fund and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

II. FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Impact Loan Fund services.

Impact Loan Fund staff reviewed the U.S. Census Report and determined that 42.7% of residents speak Spanish at home. The next highest level is at 2% of residents speaking other Indo-European languages (non-specified) and less than 2% speak Asian or Pacific Island language. Overall 44% of the population speak a language other than English. It is estaimted that 20% have limited English proficiency; that is, they speak English "not well" or "not at all". In Impact Loan Fund's target area of those persons with limited English proficiency, the largest group speak Spanish

2. The frequency with which LEP persons come in contact with Impact Loan Fund's services.

Impact Loan Fund staff reviewed the frequency with which Impact Loan Fund office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. Impact Loan Fund consistently engages with LEP persons who are Spanish-speaking on a daily basis. Impact Loan Fund has not had requests for other non-Spanish interpreters or translations. We are in process of translating appropriate documents and website into Spanish.

3. The nature and importance of services provided by the Impact Loan Fund to the LEP population.

Based on the information, 40% of our population and approximately 60% of our borrowers speak Spanish as a primary or secondary language. Impact Loan Fund is actively working to deliver our programs in English and in Spanish, generally as separate cohorts instead of single program delivered bilinqually. Impact Loan Fund staff are most likely to encounter LEP individuals through office visits, phone conversations, program delivery or training programs.

4. The resources available to Impact Loan Fund and overall costs to provide LEP assistance.

Impact Loan Fund reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise and hired bilingual staff that can communicate in Spanish. Other language translation if needed would be provided through a telephone/internet interpreter for which Impact Loan Fund would pay a fee.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Impact Loan Fund services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

Identifying an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand at initial points of contact. Impact Loan Fund will display HUD's language Identification ("I SPEAK") cards on Impact Loan Fund website and will provide messages on our phone system in English and Spanish.

- (Board/City Council) and Office staff will also be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.

- Impact Loan Fund staff will be informally surveyed periodically on their experience and frequency concerning any contacts with LEP persons during the previous year.

- Translation may not be able to be provided at every event but can easily be identified for the need for future events and events held in Spanish will be incorporated throughout the year.

Language Assistance Measures- Since a high percentage of Impact Loan Fund prospect program participants and borrowers and LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. Impact Loan Fund staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

2. The following resources will be available to accommodate LEP persons:

    i. Bilingual Staff who can communicate in Spanish language are available and can be primary point of contact for borrowers.

    ii. Language interpretation will be accessed for all other languages through a telephone interpretation service/internet

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire
- Description of language assistance services offered to the public; in person and telephone
- Use of the "I Speak" cards
- Documentation of language assistance requests

V. TRANSLATION OF DOCUMENTS

- Impact Loan Fund evaluated the cost and benefits of translating documents for potential LEP groups. ILF has determined not to translate legal documents as the jurisdiction will only consider documents in English. Other documents will be translated upon update and our website is in process of being updated and will have an English and Spanish version wherever possible. We will evaluate the translation of other documents as they are created.
- Due to the Spanish speaking LEP population, Impact Loan Fund will implement a formal outreach procedure in partnership with local organizations. If the need arises for LEP outreach to other LEP populations in addition to the Spanish-speaking population, Impact Loan Fund will consider the following options:

  When staff prepares a document, advertisement or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

VI. MONITORING

Monitoring and Updating the LEP Plan- Impact Loan Fund will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in the Impact Loan Fund service area. Updates will include:

- Determination of the current LEP population in the service area.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Impact Loan Fund's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Impact Loan Fund fully complies with the goals of this LEP Plan.

VII. DISSEMINATION OF IMPACT LOAN FUND'S LEP PLAN

Post signs at Impact Loan Fund's office and on its website notifying LEP persons of the LEP Plan and how to access language services.

This plan will be reviewed periodically but not less than every 5 years

Adopted 5/24/2024