

COMMUNITY DEVELOPMENT
FINANCIAL INSTITUTIONS FUND

www.cdfifund.gov



CDFI Fund Language Access Plan for Limited English Proficient Individuals

July 2023

Language Access Plan for Limited English Proficient Individuals Community Development Financial Institutions Fund

Established by the Riegle Community Development and Regulatory Improvement Act of 1994 (Riegle Act; P.L. 103-325), the Community Development Financial Institutions Fund (CDFI Fund) has worked for more than a quarter of a century to generate economic opportunity where it is needed most. The CDFI Fund's mission is to expand economic opportunity for underserved people and communities by supporting the growth and capacity of a national network of community development lenders, investors, and financial service providers.

The CDFI Fund generates economic opportunity in underserved low-income communities by expanding access to credit, capital, and financial services. It accomplishes this by providing capital through a variety of federal financial assistance and tax credit programs.

The purpose of this plan is to identify the responsibilities of the CDFI Fund for providing Limited English Proficient (LEP) individuals with meaningful access to vital documents and information about relevant CDFI Fund programs and services (Executive Order 13166 and Title VI of the Civil Rights Act of 1964). The following information discusses the translation services available and a brief description of the CDFI Fund's programs and customers, as well as future plans to serve LEP individuals.

CDFI Fund Customers

The volume of service to LEP individuals is extremely small because the CDFI Fund works directly with community development lenders, investors, and financial service providers rather than consumers. The CDFI Fund has very limited contact with the public¹ and very few vital documents for consumers.

The CDFI Fund does not provide services directly to the public. Telephone inquiries, emails, and service requests via the CDFI Fund's Awards Management Information System (AMIS) from the public are minimal. In addition to low-income communities and underserved areas, the CDFI Fund has designated certain populations as "Other Targeted Populations." These are African American, Hispanic, Native American, Native Alaskan residing in Alaska, Native Hawaiian residing in Hawaii and Other Pacific Islander residing in Other Pacific Islands. Because of the targeted populations approved for Certified Community Development Financial Institutions (CDFIs), the CDFI Fund focuses its outreach efforts on these populations, which may include LEP individuals.

CDFI Fund Policy

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*, affirms the federal government's commitment to improve the accessibility of services and to help ensure full participation by LEP individuals. While the CDFI Fund has little day-to-day contact with the public, we do believe that all consumers, regardless of the language they speak, should have meaningful access to information about our programs through both the CDFI Fund and our Award Recipients. The following is the CDFI Fund's policy regarding

¹ For the purpose of this LAP, the CDFI Fund considers members of the public to be individuals.

services for LEP individuals.

It is the policy of the Community Development Financial Institutions Fund (CDFI Fund) not to discriminate against any person who is Limited English Proficient (LEP). In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, the CDFI Fund will take all reasonable steps to provide LEP persons meaningful access to program information upon request.

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for CDFI Fund personnel to follow when providing services to, or interacting with, LEP individuals. Following this policy is essential to the success of the CDFI Fund's mission in ensuring reasonable access to LEP individuals.

LEP persons may request relevant materials from the CDFI Fund via our website. The CDFI Fund provides language assistance, on an as-available basis, using contractual services provided by a third-party vendor.

Upon request and within reasonable time restraints, the CDFI Fund will provide translations of our information into Spanish or other languages. The CDFI Fund will decide how to allocate its resources for translation services based on relevance, time or cost restraints.

Assessment of Need

The following areas within the CDFI Fund have public contact:

- Website;
- Help Desk channels;
- Freedom of Information Act requests; and
- Nondiscrimination and Civil Rights complaints.

Because we have current information on our website, the CDFI Fund has stopped printing almost all materials and publications.

The CDFI Fund monitors web traffic to its Spanish-language fact sheets to determine use and demand for Spanish-language web content. The data is analyzed through Enterprise Business Solutions, U.S. Department of Treasury. Of the 1,513,357 views to the CDFI Fund's website in 2022, traffic to our Spanish-related content represented 0.5% of total traffic.

The CDFI Fund's LEP Coordinator will annually review the Language Access Plan (LAP) with senior management and business unit managers to assess that demand is met.

Assistance for LEP Individuals

The CDFI Fund provides the following for LEP individuals:

- Spanish fact sheets about CDFI Programs;
- Contracted services for translations of materials into Spanish for the CDFI Fund's website.

- All Award Recipients are required to have a LAP, if applicable;
- Annual memorandum to staff from executive leadership providing information about the CDFI Fund’s Language Assistance Plan, policy, and contact information for its LEP Coordinator.
- All CDFI Fund Standard Operating Procedures will include contact information for translation services. Here is the proposed language to be added: “Language access for limited English proficiency individuals: Upon request, the CDFI Fund will provide translations of our information, including webinars if appropriate, into Spanish or other languages. The CDFI Fund will decide how to allocate its resources for translation services based on relevance, time or cost restraints. If you receive a translation request, please contact the CDFI Fund’s LEP Coordinator, Tonica Pitman. All requests must go through her.”

Public Meetings

The CDFI Fund does not conduct meetings (either virtual or in-person) for the general public. The CDFI Fund focuses its meetings on issues of interest to community development lenders, investors, and financial service providers.

Demographics

The CDFI Fund keeps current on shifting population demographics and needs through an annual review of translation requests, website analytics, and for our Award Recipients, through the use of our Civil Rights Compliance Information Worksheet, which is required from all Award Applicants.

Written Translations

Upon request and within reasonable time restraints, the CDFI Fund will provide translation of its documents free of charge. The CDFI Fund will decide how to allocate its resources for translation services based on relevance, time or cost restraints. The CDFI Fund can provide this service through a contracted vendor. All requests will go through the CDFI Fund’s LEP Coordinator, Tonica Pitman.

Responsible Staff

CDFI Fund leadership provide guidance and information to staff regarding the CDFI Fund’s responsibility to LEP individuals through an annual memorandum outlining the CDFI Fund’s policy and the resources available. The Office of Legislative and External Affairs is responsible for tracking the number of Spanish PDFs opened on the CDFI Fund’s website.

The CDFI Fund’s LEP Coordinator will track the number of language requests received from the CDFI Fund and the languages requested.

CDFI Fund Web Site

The CDFI Fund monitors web traffic to its Spanish-language fact sheets to determine use and demand for Spanish-language web content. The data is analyzed through Enterprise Business Solutions, U.S. Department of Treasury. In 2022, the traffic to our Spanish-related content represented 0.5% of total traffic.

Program²	Spanish PDFs Opened
<u>Bank Enterprise Award Program</u>	527
<u>Capital Magnet Fund</u>	113
<u>CDFI Bond Guarantee Program</u>	45
<u>Community Development Financial Institutions Program</u>	1,296
<u>Native Initiatives</u>	211
<u>New Markets Tax Credit Program</u>	1,939
<u>Small Dollar Loan Program</u>	0
<u>CDFI Certification</u>	3,704
Total Spanish PDFs Opened	7,835

Civil Rights Compliance Information Worksheet

While the CDFI Fund has limited interaction with the general public, many of our Award Recipients regularly work with LEP individuals and have identified them as Target Markets for service. The CDFI Fund annually informs its Recipients about their obligation to provide meaningful access to LEP persons through an LAP. Because of this, the CDFI Fund requires information about Recipients' LAP in its Civil Rights Compliance Information Worksheet to all applicants. We ask for the following information:

- a. Does the Applicant have a Language Assistance Plan (LAP) or process in place to support persons with limited English proficiency (LEP)? If No, describe how the Applicant will meet this requirement.
- b. Does the Applicant's LAP or process to support LEP persons take into consideration the volume, proportion, or frequency of LEP persons that the Applicant serves in determining the appropriate language assistance? If No, describe the process in determining what LEP services the Applicant chooses to provide.
- c. Does the Applicant display notices in appropriate languages in intake areas or initial points of contact on how to access language services? If No, describe how the Applicant will meet this requirement.

² The CDFI Fund recently added a Spanish fact sheet of the Small Dollar Loan Program.

- d. Does the Applicant provide language interpreter services or translated materials to LEP persons? If No, explain the reason(s) for not providing these services and how the Applicant plans to meet this requirement.

Freedom of Information Act (FOIA)

- Information about FOIA and how to file a FOIA request will be made available on the CDFI Fund's [website](#) and on Treasury's [website](#). If a request were filed in a language other than English, the CDFI Fund would use a third-party vendor to determine the nature of the request.

There will also be a sentence added stating that Spanish translation is available upon request to the [FOIA web page](#),

Para solicitar esta información en español, envíe una solicitud a través de cdfihelp@cdfi.treas.gov.

To request this information in Spanish, please submit a request to cdfihelp@cdfi.treas.gov.

Nondiscrimination and Civil Rights Information

The CDFI Fund provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, the CDFI Fund would use a third-party vendor to translate. The CDFI Fund will also monitor any and all feedback submitted regarding LEP Services. In addition, the Nondiscrimination and Civil Rights Information currently lists the e-mail address which accepts discrimination complaints. A sentence will be added to the CDFI Fund's website stating that, upon request, a Spanish translation of the Nondiscrimination and Civil Rights Information [web page](#) is available.

Para solicitar esta información en español, envíe una solicitud a través de cdfihelp@cdfi.treas.gov.

To request this information in Spanish, please submit a request to cdfihelp@cdfi.treas.gov.

Steps for Improving Access

The CDFI Fund strives to improve access for LEP individuals and will annually review its services for any new areas in language access that would be beneficial. To that end, the CDFI Fund will complete the following within the next 12 months.

Policy Statement

The CDFI Fund will post its LEP policy on www.cdfifund.gov.

Translation Services

The CDFI Fund will contract translation and interpreter services through a third-party vendor on an as-needed basis. The need for such services will be reviewed annually.

Webinars

The CDFI Fund currently provides a variety of training webinars, which are targeted to Certified CDFIs or organizations wanting to become Certified CDFIs. The CDFI Fund will ask each business unit to add to its webinar announcements the following:

Para solicitar este seminario web en español, envíe una solicitud a cdfihelp@cdfi.treas.gov

To request this webinar in Spanish, please submit a request to cdfihelp@cdfi.treas.gov.

Help Desk

When a message is received in a language other than English from one of the CDFI Fund's help desk lines, the CDFI Fund will provide language assistance using contractual services provided by a third-party vendor.

Information for the General Public

The CDFI Fund has a [Frequently Asked Questions](#) web page for the general public. This page will be translated into Spanish and available on the CDFI Fund's website later this year.