



## Language Access Plan

### Purpose & Scope

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This Language Access Plan (**LAP**) is established pursuant to and in accordance with Executive Order 13166, Improving Access to Services for Persons With Limited English Proficiency, Title VI of the Civil Right Act of 1964, 42 U.S.C. § 2000(d) et seq., Enterprise Community Loan Fund, Inc. has established the following LAP to ensure that individuals with limited English proficiency (**LEP**) may access all the resources and services that we provide. An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

### Part I – FOUR FACTOR ANALYSIS

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The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across beneficiaries. To prepare for the development of this plan, Enterprise Community Loan Fund (ECLF) conducted a Four-Factor Analysis which balanced the following factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which the LEP persons come into contact with ECLF;
3. The nature and importance of the program, activity, or service provided by ECLF;
4. The resources available and costs to ECLF.

While ECLF has little contact with the general public, ECLF is committed to improving accessibility of services and to help ensure full participation by LEP individuals and to provide meaningful access to information about our programs.

LEP persons may request relevant materials from ECLF via our website. ECLF provides language assistance, on an as-needed basis, using contractual services provided by a third-party vendor. Upon request and within reasonable time and cost constraints, ECLF will provide translations of information on our website into other languages. ECLF will determine how to allocate its resources for translation services based on relevance, time or cost restraints.

All program guidelines, policies, reporting forms, and certain other supporting program documents are available in English and upon request in any language. In addition, loan application materials are available in English and can be available in any language, depending on the preference established by the applicant in their initial application.

ECLF and its affiliates currently have multilingual staff available to fulfill preliminary communication needs in the fulfillment of ECLF's obligations under this LAP. In addition to the presence of multilingual staff available for oral interpretation services in their various capacities implementing programs, other oral interpretation services may be provided as needed. Evaluation of cost-effective measures for the provision of LEP translation services will be made prior to engaging external service providers.

For translation/transcription services that cannot be provided in-house, ECLF will contract with 3rd party translation services to provide consistent, accurate translation services for vital documents, which are generally produced in English and are translated into any language upon request.

ECLF is prepared to respond to any request received for oral interpretation services for a language other than English with appropriate interpretation services.

## **II. Language Assistance Measures**

In an effort to meet the needs of applicants for our programs and services who are LEP persons, ECLF will implement the follow steps for our financing and programmatic activities:

1. ECLF will offer an interpreter as soon as it is apparent that a person has a limited ability to read, write, speak, or understand English. An LEP person who is a companion of a person seeking services from the ECLF may also request interpreting assistance.
2. Any staff member making the determination that an interpreter is needed may make the arrangements.
3. If staff will be discussing documents with a person with LEP, they will give the interpreter adequate opportunity to review the documents prior to the discussion, and any questions about the documents will be addressed. Staff will discuss any specialized terms with the interpreter.
4. Interpretation services will be made available upon request at all ECLF public meetings.
5. Requirements will also be added for ECLF's borrowers and contractors utilizing federal pass-through funds that interact with LEP individuals to:
  - i. Develop and maintain operating procedures that address LEP assistance;
  - ii. Maintain inquiry and application logs that specify language of choice;
  - iii. Submit to ECLF on an annual basis information on their interactions and efforts to serve LEP persons.
6. Programs conducted by ECLF which entail interacting with the public will provide all marketing, outreach and marketing/information brochures and publications, applications, and vital documents in other languages as needed.
7. In addition, ECLF will:
  - (a) provide training on the requirements of this LAP, and its effective implementation to its staff. The training will include simple instructions to staff on how to access and use the third-party vendor translation services and interpretation services, as needed. In conjunction with this training, a curriculum will be developed which addresses a description of internal resources available and how to access them, and response protocols for addressing callers, in-person contacts, and availability and access to external referral resources.
  - (b) Insert "tag lines" on all printed outreach materials indicating the availability of translation and interpretation services.
  - (c) Explore access to community-based services which provide translation and interpretation services for LEP individuals.

(d) Conduct an annual survey of ECLF staff to create a language bank of multilingual staff members who can be readily called upon when needed, as well as collect information regarding the incidence of requests for information and services in minority languages.

(e) Conduct targeted outreach (as a supplement to existing outreach efforts) to LEP populations via community contacts, engagement events or other available means.

(f) Continue to provide interpretation services as necessary to ensure access by LEP individuals in all federally funded activities.

### III. LAP Implementation

Implementation and coordination of all activities required under the Language Access Plan shall be the responsibility of ECLF's Compliance and Reporting Manager, who shall be responsible for monitoring the effectiveness of the plan.

This LAP shall be reviewed annually to ensure conformance with all statutory requirements, monitor changes in the language characteristics of its population, monitor program demand by LEP individuals, evaluate its effectiveness, and amended as necessary to accommodate modifications to demographic changes, client needs, regulatory requirements, and revised or new federally funded programs and projects.

Program accessibility for LEP individuals may be requested:

Via email: [eclfreporting@enterprisecommunity.org](mailto:eclfreporting@enterprisecommunity.org)

Hours: Monday to Friday from 8:00am-5:00pm

### IV. Complaints

Complaints on any issues related to the general administration of ECLF programs and products are always accepted and addressed in a timely manner, including those related to the LAP. ECLF aims to provide an opportunity to address all complaints received. Addressing these complaints is an essential responsibility for ECLF, as it establishes the importance of an open communication regarding our partners concerns about the programs. In compliance with 24 C.F.R. § 570.486(a)(7), all complaints are dealt with promptly and consistently and at a minimum, to provide a timely, substantive written response to every **written** complaint within **fifteen (15) business days**, where practicable.

ECLF provides an opportunity to address all complaints received, either formally or informally. An informal complaint refers to those complaints that are verbally communicated through ECLF staff. All formal complaints will be documented, processed, filed and answered. Complaints with insufficient data or submitted by a third party with no standing in the matter being submitted need not be accepted or reviewed. ECLF offers reasonable accommodation to ensure equal opportunity. ECLF ensures that the LEP community is served and will always provide reasonable accommodations as requested. Complaints can be communicated by the following methods:

- Via email: [eclfreporting@enterprisecommunity.org](mailto:eclfreporting@enterprisecommunity.org)

Hours: Monday to Friday from 8:30am-5:00pm

## Additional Documentation

Regulation/Guideline	Reference
Title VI of the Civil Right Act of 1964, 42 U.S.C. § 2000(d) et seq	Purpose and Scope
Executive Order 13166, Improving Access to Services for Persons With Limited English Proficiency	Purpose and Scope
24 C.F.R. § 570.486(a)(7)	Section IV (Complaints)

## Revision History

All changes made to any information within this Policy are outlined in the table below to ensure ECLF properly tracks all versions and modifications made:

Version #	Revision Description	Date of Revision	Approver(s)

## Monitoring & Governance

This Policy must be reviewed and approved, at a minimum, on a biennial basis. Policy reviews must also occur if significant process changes or regulatory changes are implemented, regardless of the effective date of the Policy. The Policy Owner is responsible for:

- Facilitating this Policy review
- Making revisions and updates to this Policy
- Monitoring compliance with this Policy
- Escalating any compliance failures associated with this Policy