

COMMUNITY DEVELOPMENT  
FINANCIAL INSTITUTIONS FUND

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# **CDFI Fund Language Access Plan for Limited English Proficient Individuals**

*September 2024*

## **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 general public<sup>1</sup> and very few vital documents for consumers.

The CDFI Fund does not provide services directly to the general public. Telephone inquiries, emails, and service requests via the CDFI Fund's Awards Management Information System (AMIS) from the general 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, Native Hawaiian, Other Pacific Islander, Filipino, Vietnamese, and Persons with Disabilities. Because of the targeted populations approved for Certified Community Development Financial Institutions (CDFIs), the CDFI Fund supports CDFIs in their outreach efforts to 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 general 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

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<sup>1</sup> For the purpose of this LAP, the CDFI Fund considers members of the general public to be individuals outside of the CDFI industry.

regarding 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 contact with the general public:

- 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'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;

- 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.”
- The CDFI Fund has posted its LEP policy on its website, and updates this policy on an annual basis: [CDFI Fund Language Access Plan](#).
- Frequently Asked Questions web page is translated into Spanish and available on the CDFI Fund’s website.
- 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 translate the message and response using contractual services provided by a third-party vendor.

### **Public Meetings**

The CDFI Fund holds meetings on issues of interest to community development lenders, investors, and financial service providers, and does not conduct meetings (either virtual or in-person) for the general public.<sup>2</sup>

### **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 Title VI Compliance Worksheet, which is required from all Award Applicants.

### **Written Translations**

Upon request and within reasonable time, the CDFI Fund will provide translation of its documents free of charge after deciding how to allocate its resources for translation services based on relevance, time or cost restraints. The CDFI Fund will provide this service through a

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<sup>2</sup> Public Meetings: The CDFI Fund does not conduct meetings (either virtual or in-person) for the general public.[1] The CDFI Fund focuses its meetings on issues of interest to community development lenders, investors, and financial service providers.

[1] Section 104(d) of the Community Development Banking and Financial Institutions Act of 1994 established the Community Development Advisory Board to advise the Director of the Fund on policies regarding the activities of the CDFI Fund. The Advisory Board meets at least annually either in person or virtual and the meetings are open to the general public. Upon request and within reasonable time restraints, the CDFI Fund will provide translations of the meeting into Spanish or other languages.

contracted vendor. All requests will go through the CDFI Fund’s LEP Coordinator, Tonica Pitman.

**Responsible Staff**

CDFI Fund leadership provides 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 on the behalf of the U.S. Department of Treasury. The data below represents the traffic to our Spanish related content in 2023.

<b>Program<sup>3</sup></b>	<b>Spanish PDFs Opened</b>
<a href="#"><u>Bank Enterprise Award Program</u></a>	450
<a href="#"><u>Capital Magnet Fund</u></a>	367
<a href="#"><u>CDFI Bond Guarantee Program</u></a>	280
<a href="#"><u>CDFI Certifications</u></a>	1,203
<a href="#"><u>Community Development Financial Institutions Program</u></a>	1,775
<a href="#"><u>Native Initiatives</u></a>	110
<a href="#"><u>New Markets Tax Credit Program</u></a>	1,146
<a href="#"><u>Small Dollar Loan Program</u></a>	554
<a href="#"><u>Rapid Response Program</u></a>	88
<a href="#"><u>Equitable Recovery Program</u></a>	148
<b>Total Spanish PDFs Opened</b>	<b>6,121</b>

**Civil Rights Compliance Information Worksheet**

While the CDFI Fund has limited interaction with the general public, many of our Applicants work with LEP individuals and have identified them as part of their Target Markets for service.

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<sup>3</sup> The CDFI Fund recently added a Spanish fact sheet of the Small Dollar Loan Program.

The CDFI Fund annually informs its Recipients about their obligation to provide meaningful access to LEP persons through an LAP. As such, the CDFI Fund requires information about the LAP requirement in its Title VI Compliance Worksheet to all applicants. Some of the information requested include:

- a. Does the Applicant have a Language Assistance Plan (LAP) or other 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 other 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.
- 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 is available on the CDFI Fund's [website](#) and on Treasury's [website](#). If a request is filed in a language other than English, the CDFI Fund will use a third-party vendor to determine the nature of the request.

A statement has been added to the FOIA information section on the websites that Spanish translation will be available for requests being submitted to the [FOIA web page](#)

Para solicitar esta información en español, envíe una solicitud a través de [cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov).

To request this information in Spanish, please submit a request to [cdfihelp@cdfi.treas.gov](mailto: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 is filed in a language other than English, the CDFI Fund will provide language assistance using contractual services provided by a third-party vendor. The CDFI Fund will also monitor all feedback submitted regarding LEP Services. In addition, the Nondiscrimination and Civil Rights Information currently lists the e-mail address that accepts discrimination complaints. The CDFI Fund's website includes a statement that, upon request, a Spanish translation of the Nondiscrimination and Civil Rights Information [web page](#) will be available.

Para solicitar esta información en español, envíe una solicitud a través de [cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov).

To request this information in Spanish, please submit a request to [cdfihelp@cdfi.treas.gov](mailto: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 webinars within the next 12 months.

### **Webinars**

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

Para solicitar este seminario web en español, envíe una solicitud a [cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov)

To request this webinar in Spanish, please submit a request to [cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov).