

**Neighborhood Community Development Fund Language Access Plan for Limited English Proficient Individuals**

*July 2023*

**Language Access Plan for Limited English Proficient Individuals Neighborhood Community Development Fund**

Established in February of 2000, the Neighborhood Community Development Fund (NCDF) has worked for more than 20 years to generate economic opportunity where it is needed most. NCDF’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.

NCDF 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 loan products and the provision of technical assistance.

The purpose of this plan is to identify the responsibilities of NCDF for providing Limited English Proficient (LEP) individuals with meaningful access to vital documents and

information about relevant NCDF 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 NCDF’s programs and customers, as well as future plans to serve LEP individuals.

# NCDF Customers

The volume of service to LEP individuals has historically been small, because for the first 21 years of its existence, NCDF served only the 14 neighborhoods of the Northside. Further narrowing this focus, NCDF historically only lends to small business owners. The % of LEP customers that owned businesses on the Northside is less than 1% of the total number of businesses. NCDF did not do consumer or mortgage lending. Community service and affordable housing loans were made directly to organizations, not individuals.

However, with our expansion of our service area to cover all of Allegheny County, inquiries from LEP individuals has increased significantly. Telephone inquiries, emails, and service requests via NCDF’s from the public, particularly small business owners, is growing. Because NCDF expanded its service area, our outreach efforts will include more LEP individuals.

**NCDF 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. NCDF believes that all consumers, regardless of the language they speak, should have meaningful access to information about our programs through NCDF. The following is NCDF’s policy regarding services for LEP individuals.

It is the policy of the Neighborhood Community Development Fund (NCDF) 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, NCDF 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 NCDF’s mission in ensuring reasonable access to LEP individuals.

LEP persons may request relevant materials from NCDF 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, NCDF will provide translations of our information into Spanish or other languages. NCDF will decide how to allocate its resources for translation services based on relevance, time or cost restraints.

# Assessment of Need

The following areas within NCDF have public contact:

* Website;
* Help Desk channels;
* Freedom of Information Act requests; and
* Nondiscrimination and Civil Rights complaints.
* Printed Marketing Materials

NCDF has provided a google translate interface on its website. NCDF monitors web traffic to its google translate feature to determine use and demand for non-English-language web content. The data is analyzed through our third party web hosting consultant, Pipitone Group. Of the XXX views to NCDF’s website in 2023, traffic to non-English related content represented 0.5% of total traffic.

NCDF’s Director of Operations 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

NCDF provides the following for LEP individuals:

* Spanish fact sheets about NCDF Programs;
* Contracted services for translations of materials into Spanish for NCDF’s website and printed materials.
* Annual memorandum to staff and board from executive leadership providing information about NCDF’s Language Assistance Plan, policy, and contact information for its LEP

Coordinator.

* All NCDF 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, NCDF will provide translations of our information, including webinars if appropriate, into Spanish or other languages. NCDF 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 NCDF’s Director of Operations, Jennifer Harris. All requests must go through her.”

# Public Meetings

NCDF does not conduct meetings (either virtual or in-person) for the general public. NCDF focuses its meetings on issues of interest to small business owners, investors, financial service providers, and community development organizations.

# Demographics

NCDF keeps current on shifting population demographics and needs through an annual review of translation requests, website analytics, and information from our technical assistance and lending activities.

# Written Translations

Upon request and within reasonable time restraints, NCDF will provide translation of its documents free of charge. NCDF will decide how to allocate its resources for translation services based on relevance, time or cost restraints. NCDF can provide this service through a contracted vendor. All requests will go through NCDF’s Director of Operations, Jennifer Harris.

# Responsible Staff

NCDF leadership provide guidance and information to staff regarding NCDF’s responsibility to LEP individuals through an annual memorandum outlining NCDF’s policy and the resources available. The Director of Operations, in conjunction with our web site manager consultant, is responsible for tracking the number of Spanish PDFs opened on NCDF’s website. NCDF’s Director of Operations will track the number of language requests received from NCDF and the languages requested.

# NCDF Web Site

NCDF began monitoring web traffic to its non-English-language translation pages to determine use and demand for non-English web content. The data is analyzed through google analytics that is generated by our web site consultant. In January of 2024, the traffic to our non-English content represented 0.5% of total traffic.

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| --- | --- |
| **Page** | **Spanish PDFs****Opened** |
| [Home](https://www.cdfifund.gov/sites/cdfi/files/2022-11/Bank_Enterprise_Award_Program_FactSheet_Spanish.pdf) Page | xxx |
| [Apply](https://www.cdfifund.gov/sites/cdfi/files/2022-11/Bank_Enterprise_Award_Program_FactSheet_Spanish.pdf) | xxx |
| [About](https://www.cdfifund.gov/sites/cdfi/files/2022-11/Capital_Magnet_Fund_FactSheet_Spanish.pdf) Us  | xxx |
| [Ways](https://www.cdfifund.gov/sites/cdfi/files/2022-11/Native_Initiatives_FactSheet_Spanish.pdf) We Help | xxx |
| Let’s Get Started | xxx |
| [Our](https://www.cdfifund.gov/sites/cdfi/files/2022-11/Small_Dollar_Loan_Program_FactSheet_Spanish.pdf) Projects | xxx |
| [Blog](https://www.cdfifund.gov/sites/cdfi/files/documents/cdfi_certification_span.pdf) & News | xxx |
| Total non-English Translations | **xxx** |

# Civil Rights Compliance Information Worksheet

NCDF has somewhat limited interaction with the general public, in that we do not do direct lending to consumers, a growing number of our small business clients are LEP individuals. NCDF has an obligation to provide meaningful access to LEP persons through an LAP. Because of this, NCDF completes an annual Civil Rights Compliance Information Worksheet that includes information about our LAP. This review focuses on our process to support LEP persons, taking into consideration the volume, proportion, or frequency of LEP persons that the Applicant serves in determining the appropriate language assistance. We also review whether we display notices in appropriate languages in intake areas or initial points of contact on how to access language services?

# Freedom of Information Act (FOIA)

* Information about FOIA and how to file a FOIA request will be made available on NCDF’s website. If a request were filed in a language other than English, NCDF 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 Director of Operations,

Para solicitar esta información en español, envíe una solicitud a través de info@ncd-fund.org.

To request this information in Spanish, please submit a request to info@ncd-fund.org.

# Nondiscrimination and Civil Rights Information

NCDF provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, NCDF would use a third-party vendor to translate. NCDF will also monitor 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 NCDF’s website stating that, upon request, a Spanish translation of the Nondiscrimination and Civil Rights Information [web page](https://www.cdfifund.gov/about/non-discrimination) is available.

Para solicitar esta información en español, envíe una solicitud a través de info@ncd-fund.org.

To request this information in Spanish, please submit a request to info@ncd-fund.org.

# Steps for Improving Access

NCDF 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, NCDF will complete the following within the next 12 months.

# Policy Statement

NCDF will post its LEP policy on [www.ncd-fund.org](http://www.ncd-fund.org).

# Translation Services

NCDF 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

NCDF currently provides a variety of training webinars, which are targeted to Certified CDFIs or organizations wanting to become Certified CDFIs. NCDF 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.

# Phone Calls

When a phone inquiry or message is received in a language other than English, NCDF will provide language assistance using contractual services provided by a third-party vendor.

# Information for the General Public

NCDF web site has been optimized for Google Translate. All pages are translatable. We contract with a translation service to review these pages as they are updated, or at least annually if no updates are made.