

Approved
May 29, 2024

Language Access Plan for Limited English-Proficient Individuals

True Access Capital's ("TAC") is a Community Development Financial Institution (CDFI) whose mission is to build a thriving community by empowering a diverse base of entrepreneurs and businesses through access to capital, education, advocacy and opportunity. Founded in 1992, TAC builds wealth and strengthens low-wealth communities by helping small businesses, primarily led-by and in-service-to women and all people of color in Delaware and southeastern Pennsylvania.

The purpose of this plan is to identify the responsibilities of TAC for providing Limited English Proficient (LEP) individuals with meaningful access to vital documents and information about relevant TAC 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 TAC's programs and customers, as well as future plans to serve LEP individuals.

TAC Customers

TAC works directly with borrowers, business owners and entrepreneurs and therefore has direct contact with the public. Low-income communities in underserved areas is TAC's designated "Targeted Population" and these frequently include LEP individuals. Because of this targeted population, TAC focuses its outreach efforts on this population, including its LEP individuals.

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

It is the policy of TAC 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, TAC 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 TAC personnel to follow when providing services to, or interacting with, LEP individuals. Following this policy is essential to ensuring that LEP individuals have reasonable access to TAC's financial products and services.

LEP persons may request relevant materials from TAC, via its website and social media platforms. TAC provides language assistance using Google Translate. Our website includes instructions how to translate the webpages from English to another language.

Additionally, if needed, upon request and within reasonable time restraints, TAC will provide translations of our information into Spanish or other languages. TAC will decide how to allocate its resources for translation services based on relevance, time or cost restraints.

TAC will maintain a staff position for an LEP Coordinator who shall report to senior management and primarily be responsible for implementation and management of TAC's policy to address the needs of LEP individuals.

Assessment of Need

TAC has identified Spanish as the predominant language group within its service area. Accordingly, this Limited English Proficiency (LEP) Plan is crafted to cater to the needs of Spanish-speaking individuals. However, acknowledging the diversity of language needs within the community, TAC will make reasonable efforts to accommodate individuals and groups speaking languages other than Spanish, adhering to the principles outlined in this policy.

The following areas within TAC have public contact:

- TAC Website;
- Social Media Platforms;
- Seminars and webinars (virtually and in-person);
- Brochures and other printed materials; and
- Meetings, workshops, trainings, and other communications with borrowers and other clients.

As an integral component of assessing needs, TAC conducts regular monitoring of traffic on its website and social media platforms to gauge the demand for Spanish and other language content. This data is analyzed by the LEP Coordinator. Annually, the LEP Coordinator meets with senior management and all personnel interfacing with the public to review the Language Access Plan (LAP), ensuring alignment with the identified demand and making necessary adjustments as warranted.

Assistance for LEP Individuals

TAC provides the following for LEP individuals:

- Spanish brochures about TAC programs and loans;
- Google Translate for translations of materials into Spanish and other languages on TAC's website.
- Annual memorandum to staff from executive leadership providing information about TAC's Language Assistance Plan, policy, and contact information for its LEP Coordinator.
- TAC Employee Manual includes information for translation services as follows:
 - "Language access for limited English proficiency individuals:
 - Upon request, TAC will provide translations of its information into Spanish or other languages. TAC will decide how to allocate its resources for translation services based on

relevance, and time and cost restraints. If you receive a translation request, please contact TAC's LEP Coordinator. All requests must go through him/her."

- TAC website has Google Translate for LEPs. Instructions to use Google Translate is provided on the website."

Public Meetings

TAC conducts a variety of public sessions, including meetings, workshops, trainings and seminars, which may be conducted either virtually or in-person for borrowers and other clients. In line with its commitment to accessibility, TAC will, within reason, subject to time and costs, provide translation services for all written and verbal materials presented to the public during these events.

Demographics

TAC keeps current on the evolving population demographics and requirements, by conducting an annual review of translation requests and website analytics. This process is facilitated through the utilization of the Civil Rights Compliance Information Worksheet, mandated for all CDFI Fund Awardees. By diligently analyzing translation requests and website analytics, TAC ensures responsiveness to the changing needs of the communities it serves.

Written Translations

Upon request and within reasonable time restraints, TAC will provide translation of its documents free of charge. TAC will decide how to allocate its resources for translation services based on relevance, time and cost restraints. TAC may provide this service through a contracted vendor; however, all requests will go through TAC's LEP Coordinator.

Responsible Staff

TAC leadership provide guidance and information to staff regarding the organization's responsibility to LEP individuals through an annual memorandum outlining TAC's LAP Policy and the available resources.

TAC's LEP Coordinator will track the number of language requests received by TAC and the languages requested.

TAC Web Site

TAC monitors traffic to its website and all social media platforms to determine the demand for Spanish and other language content. The data is analyzed by the LEP Coordinator. Annually, the LEP Coordinator meets with senior management and all personnel interfacing with the public to review the Language Access Plan (LAP), ensuring alignment with the identified demand and making necessary adjustments as warranted.

Civil Rights Compliance Information Worksheet

TAC may utilize third-parties in the delivery of its services to LEP individuals. To the extent TAC

engages, such third-parties, TAC will inform them annually of their obligation to provide meaningful access to LEP persons through its LAP Plan and will request the following Civil Rights Compliance Information Worksheet certifications:

Civil Rights Compliance Information Worksheet

In Compliance with the Title VI of the Civil Rights Act of 1964 (Title VI) and Section 504 of the Rehabilitation Act of 1973 (Section 504), we certify the following:

- We have a Language Assistance Plan (LAP) or process in place to support persons with limited English proficiency (LEP). If Not, describe how you will meet this requirement.
- Our LAP or process to support LEP persons takes into consideration the volume, proportion, or frequency of LEP persons that we serve in determining the appropriate language assistance. If Not, describe the process in determining what LEP services you choose to provide.
- We display notices in appropriate languages in intake areas or initial points of contact on how to access language services. If Not, describe how you will meet this requirement.
- We provide language interpreter services or translated materials to LEP persons. If Not, explain the reason(s) for not providing these services and how you plan to meet this requirement.
- Do you provide language interpreter services or translated materials to LEP persons? If Not, explain the reason(s) for not providing these services and how you plan to meet this requirement.

Nondiscrimination and Civil Rights Information

TAC provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, TAC would use a third-party vendor to translate. TAC will also monitor any feedback submitted regarding LEP Services. In addition, the Nondiscrimination and Civil Rights Information currently lists the e-mail address that accepts discrimination complaints. The below paragraph is in English and Spanish on the website:

“In accordance with federal law and U.S. Department of the Treasury policy, this institution is prohibited from discriminating based on race, color, national origin, sex, age, or disability. Submit a complaint of discrimination, by mail to U.S. Department of the Treasury, Office of Civil Rights and Equal Employment Opportunity, 1500 Pennsylvania Ave. N.W., Washington, D.C. 20220, (202) 622-1160 (phone), (202) 622-0367 (fax), or email crcomplaints@treasury.gov (email).”