

## Community Development Finance Alliance's Language Access Plan for Limited English Proficient Individuals

Founded in 2010, Community Development Finance Alliance (CDFA) is a nonprofit Community Development Entity (CDE) with a mission of deploying capital in underserved communities in Utah by providing below-market financing coupled with strong technical assistance. We work with nonprofit community organizations and government agencies that lack real estate development experience or the staff capacity to secure financing for complex projects on their own. Our services include assisting nonprofit organizations in structuring financing, securing debt and equity investments, and navigating the finance and development processes to develop facilities that are critical to Utah's distressed and urban and rural communities.

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

### CDFA Customers

The volume of service to LEP individuals is extremely small because CDFA works directly with community development organizations, governmental agencies, lenders, investors, and financial service providers rather than consumers. CDFA has very limited contact with the public <sup>1</sup> and very few vital documents for consumers.

CDFA does not provide services directly to the public. Telephone inquiries and emails from the public are minimal.

### CDFA 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 CDFA 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. The following is CDFA's policy regarding services for LEP individuals.

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<sup>1</sup> CDFA considers members of the public to be individuals.

It is the policy of CDFA 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, CDFA will take all reasonable steps to provide LEP persons meaningful access to our services 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 CDFA personnel to follow when providing services to, or interacting with, LEP individuals. Following this policy is essential to the success of CDFA's mission in ensuring reasonable access to LEP individuals.

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

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

## Assessment of Need

The following areas within CDFA have public contact:

- Website;
- Nondiscrimination and Civil Rights complaints.

CDFA's LEP Coordinator will annually review the Language Access Plan (LAP) with senior management to assess that demand is met.

## Assistance for LEP Individuals

CDFA provides the following for LEP individuals:

- Contracted services for translations of materials into Spanish for CDFA's website.
- Annual memorandum to staff from executive leadership providing information about the CDFA's Language Assistance Plan, policy, and contact information for its LEP Coordinator.
- CDFA's Policies and 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, CDFA will provide translations of our information, into Spanish or other languages. CDFA 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 CDFA's LEP Coordinator, Janell Duffin. All requests must go through her."

## Public Meetings

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

## Written Translations

Upon request and within reasonable time restraints, CDFA will provide translation of its documents free of charge. CDFA will decide how to allocate its resources for translation services based on relevance, time, or cost restraints. CDFA can provide this service through a contracted vendor. All requests will go through CDFA's LEP Coordinator, Janell Duffin.

## Responsible Staff

CDFA's leadership will provide guidance and information to staff regarding CDFA's responsibility to LEP individuals through an annual memorandum outlining CDFA's policy and the resources available. CDFA's LEP Coordinator will track the number of language requests received, and the languages requested.

## Nondiscrimination and Civil Rights Information

CDFA provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, CDFA would use a third-party vendor to translate. CDFA 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.

## Steps for Improving Access

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

## Policy Statement

CDFA will post its LEP policy on [www.cdfautah.org](http://www.cdfautah.org).

## Translation Services

CDFA 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.