



**Language Assistance Plan (LAP) for
Limited English Proficient (LEP) Individuals
Policies & Procedures
Spring 2024**

I. Language Access Policy Directives

Mission Statement

We are a community development organization working with Community Development Financial Institutions (CDFIs) and other partners to increase access to affordable, flexible project financing in and around Bloomington and the Indiana Uplands.

General Policy Statement, Purpose and Authority

It is the policy of CDFI Friendly Bloomington (CFB) to provide timely, free of charge, and meaningful access for LEP individuals to all CFB programs and activities, especially those receiving federal financial assistance. All personnel shall be trained on and will provide free language assistance services to LEP Individuals whom they encounter, or will inform LEP individuals and the public that language assistance services are available free of charge.

Per Title VI of the Civil Rights Act of 1964 and Executive Order 13166, these policies and procedures were created for use by CFB staff members and other agents of the organization involved in the administration of federal grants through the provision of what is considered Federal Financial Assistance . They focus on the accessibility of services for those with Limited English Proficiency (LEP) in the service area of CDFI Friendly Bloomington (CFB).

These policies and procedures are based on guidance from US Department of Justice Planning Tools for Federally Conducted and Federally Assisted Programs, which contained resource and self-assessment information to better inform our organization's actions to adhere to new Title VI requirements.



II. Language Access Plan Components

Scope

These policies apply to all employees and agents performing programmatic duties on behalf of CFB. This includes all staff and board members acting as agents of the organization. The organization will also endeavor to clearly identify funding sources and line items relating to provision of language assistance in its next fiscal year budget, as well as discuss the importance of bilingual staff capabilities in future hiring notices.

As of May 2024, there is one staff person at CFB, The Executive Director. The organization's board of directors is currently made up of six individuals. CDFI Friendly Bloomington covers a region that includes 13 Indiana counties: *Brown, Crawford, Daviess, Dubois, Greene, Jackson, Lawrence, Martin, Monroe, Morgan, Orange, Owen and Washington.*

Provision of Notice of Language Assistance Services

The following information is posted on the CDFI Friendly website, as well as all public materials for the organization:

It is the policy of CDFI Friendly Bloomington (CFB) to provide, free of charge, timely and meaningful access for Limited English Proficient (LEP) individuals to all CFB programs and activities. To inquire about language assistance services, please contact us at info@cdfifriendlybtown.org or 812.320.9003.

Information Gathering

CDFI Friendly will collect data on potential clients needing language assistance services via our website intake form, as well as through telephone, e-mail and word-of-mouth communication we receive from community stakeholders. This data will be tracked on organizational databases and spreadsheets along with other project data. Once information is collected, this will better inform both our short- and long-term service provision.



Service Procurement (May 2024 pricing)

CDFI Friendly Bloomington will work with the following providers*:

Central Indiana Language Services (CIIS)

interpreter@ciis.us

317.847.7598

<https://ciis.us/>

CIIS is a language assistance provider covering Central and Southern Indiana that works on an as-needed basis and offers both translation and interpretive services. Generally, translation services are priced at approximately \$0.25 per word. Interpreter services can vary, but start at \$60 per hour for a minimum of two hours. Interpretive services can be performed via phone or video conference, as well as in-person. For in-person services, the federal mileage rate is charged for travel within 20 miles of the interpreter. For travel above that amount, mileage and an hourly rate for travel may be assessed.

Midwest Language Services

info@midwestlanguageservices.com

317.296.7997

<https://www.midwestlanguageservices.com/>

Midwest is an as-needed language service provider offering translation and interpretive services. They would serve as our secondary service provider. As is the case with CIIS, there is no service agreement necessary.

Language Line Solutions

mhoppe@languageline.com

800.752.6096 or 800.752.0093

<https://www.languageline.com/>

Language Line Solutions, based in California, has access to a range of interpreters accessed via phone and video for interpretative services. Interpretive services can be done on-demand (\$3.95-\$4.95/minute), or under contract depending on the volume of service needed. There is a \$100 monthly minimum for service contracts.

They can also translate documents. Pricing is based on language needed, word count and type of translation (format) needed, and translation involves both human-edited and AI translation.

Notice on procurement: for any service paid for with federal funding, CFB should adhere to necessary federal procurement regulations through the issuance of an RFQ and should work to obtain at least three quotes. As of May 2024, CFB has not issued a formal RFQ, but has solicited quotes and information from the organizations above.

**Provider list is subject to change if more providers are identified. This list is not exhaustive.*

Language Access Procedures

Appointment of Language Access Coordinator/Responsible Personnel

Until otherwise decided by the CFB board or Executive Director, the organization's language access coordinator/responsible personnel is the Executive Director or their designee. Following necessary training, this responsibility can also be delegated to future additional staff or part-time staff or interns.

Project Inquiry Form & Need Identification (see next section for service procurement procedures)

The initial intake of information for a client may come in several forms: via the website intake form, a phone call or an e-mail. For the responsible personnel coordinating language access, this need should be assessed based on what type of information is gathered.

Website intake form: this will likely provide CFB with the most information about the potential client, as well as provide the most amount of time for language assistance to be coordinated. Staff should assess needs and keep in mind reasonable customer service response times to ensure meaningful access for the client. In this case, the CFB staff member should:

- Send a short, but introductory message to the potential client in order to make contact. If the completed intake form indicates the client is in need of LEP

services, indicate to them this service is being coordinated and that CFB will be in touch as soon as possible. It should be acknowledged that this response message will likely be written in English, but to ensure meaningful and timely access to services, please send the introductory message and indicate that services are being coordinated.

- Reach out to one of the three service providers listed in this document depending on your initial assessment of client need.

E-mail communication: while e-mail communication may afford time, the same principles regarding customer service response times and meaningful access should be kept in mind with regard to e-mail. An additional factor could be that the e-mail communication is in another language, or contains limited English proficient language. In this case, the CFB staff member should follow the same protocol that is followed for the website intake form. In both cases, response time and as frequent and thorough communication as possible should be kept in mind.

Phone calls: If a phone call is answered, it will be the responsibility of the staff person answering it to obtain basic information to ensure a timely response for the client. This could include:

1. A number on the caller ID/screen where the call might be returned.
2. The client's name, or the name of a contact you are given for the client.
3. Type of language assistance service needed (language, format).
4. If possible, type of CDFI service needed (small business expansion, housing, childcare, etc.).

If the staffer answering the call is not able to communicate in the same language as the client/caller, please take down as complete information as possible and do your best to indicate back to the client that you are working to coordinate language assistance services.

Following the phone call, the CFB staff person should assess the need type and reach out to one of the services listed in this document. Again, keep in mind response time.

Voicemail: If a voicemail is left, follow the same protocol as a phone call intake.

Text message: Treat text messages in the same manner in which you would an e-mail.

Procurement of Services (In-person, video, telephone interpretative services, as well as document translation) and Data Tracking

For each of the three services listed above, as well as others, the initial interface with service providers is fairly simple. Once the need is determined, any of the three services above can be contacted via e-mail or phone (information above). Once contact is made with one of the providers:

1. Be sure to write down the service provider staff person name and the date you spoke to the service.
2. Inform them you are in need of interpretive or translation services, and that you are looking for a quote. Please keep the following in mind:
 - a. **For translations**, services may charge per word or page, and will also ask that you submit the language needed for translation in an MS Word or other easily-editable format.
 - b. **For interpretive services**, please identify the language(s) needed to the service provider, as well as your first choice on in-person, phone or video service provision. Think about what is best for the client, and think about time and cost constraints as well.
3. For both translation and interpretive services, clearly state to the service provider what your firm timeline/deadline is for the service. Allow for some extra time in planning services with the client in order to manage expectations, and for purposes of scheduling.
 - a. For instance, if you ask for a document translation to be returned on a Wednesday, you might tell the client you will get them the document by Friday. This allows some flexibility in case of return delays from a service provider, and also allows you, as the CFB staffer, time to finalize the document.
4. For interpretive services, once the service time is scheduled (phone, video or in-person meeting), a CFB staff member should be present in order to facilitate the conversation and to evaluate the quality of the service provided.
5. Once the service is concluded, CFB should receive an invoice from the service provider that should be paid in a timely fashion. It is also possible services will be



charged to a credit card. Please see the Community Foundation Controller to help facilitate payment processes for services provided.

6. Once the service is provided and the bill is paid, CFB staff should record the services provided in the organization's project Google files. The following information should be included:
 - a. Name of CFB Project (business name, project address, etc.)
 - b. Community and county in which project is located
 - c. Client Name and anyone else present at the meeting
 - d. Client intake date
 - e. Language Assistance provided (translation, interpretive, or both)
 - i. List of languages translated/interpreted (Spanish, Mandarin, etc.)
 - f. Name of service provider
 - g. Method of service delivery (video, in-person, document translation, etc.)
 - h. Number of times service was provided
 - i. Date of last service provided
 - j. Total cost of the services provided, as well as funding source

How Staff Should Process Language Access Complaints

If a complaint arises pertaining to CFB's provision of language assistance services, written comments should be directed to the CDFI Friendly Bloomington Board of Directors in any of the following ways:

Written communication can be e-mailed to Tina Peterson, Board President, at tinapeterson@cfbcmc.org.

It can also be mailed to the following:
CDFI Friendly Bloomington Board of Directors
Re: Language Assistance Services
100 S. College Ave., Suite 240
Bloomington, IN 47404

Telephone communication may be conveyed by directing a call to Tina Peterson's attention at the Community Foundation of Bloomington & Monroe County:
812.333.9016.



Upon receiving information, the Board of Directors will discuss it at a duly-called meeting to determine any additional action.

Training & Staff Compliance

All CDFI Friendly Bloomington staff (full- or part-time), volunteer board members and others acting on behalf of the organization must undergo language assistance training. Under the current structure of the organization, this will be done annually at a meeting of the CFB board by reviewing, updating and acknowledging (through signature) this manual. Training will also include studying case examples in a group setting of CFB communication with clients who may be LEP. This will all present to better understand how our organization works to provide language assistance to our clients.

Staff or board members who join the organization outside of the regular annual training schedule should review and acknowledgement of this manual, as well as discuss any other training opportunities with the CFB Executive Director.

III. Monitoring, Evaluating and Updating the Language Access Policy (LAP) Directives

The administration of these policies should be done on an ongoing basis, with points of evaluation as follows:

- **Policy review**: At least one time per year, the CFB board should review this document to reflect any updates needed according to information gained through the provision of service, or by direction given from the US Department of Justice or the US Department of Treasury.
- **Stakeholder Review**: At least one time per year, CFB will engage clients or potential clients, as well as language assistance stakeholders to solicit feedback on any changes recommended for language assistance services. This could involve in-person conversations or meetings, written communication or through an organized event. Stakeholders include clients, regional nonprofit organizations, language assistance service providers, partnering Community Development Financial Institutions (CDFIs) and education stakeholders such as Indiana University and local school districts and/or nonprofit education organizations.
- **Data Review**: At least one time per year, or as required by new information, CFB will review the “Data Sources” links at the end of this document in order to update demographic and other information. Any new resources containing necessary or useful data will be added to the “Data Sources” section.
- If a change in policy is recommended during the course of a programmatic (calendar) year, those changes must be approved by the CFB board at any properly called meeting.
- Any changes made to this document, as well as any reference information guiding changes, should be saved in the CFB Google document files.

IV. Background Information, Need Identification and Data Sources

***Definitions (from LAP Assessment and Planning Tool)**

Translation

Translation is a written language assistance service - the replacement of written text from one language to another. Documents needing translation could include consent and complaint forms; intake and application forms, notices of rights, denials, losses or decreases in benefits or services.

Interpretation

Interpretation is an oral language assistance service where a qualified interpreter renders a message spoken in one language into one or more languages. Interpretation can take place in-person, through a telephonic interpreter, or via Internet or video interpreting. CFB should avoid using family members, children, friends and untrained volunteers as interpreters for language assistance services.

**This section should be updated with additional definitions as needed and desired to assist CFB staff and board members with training.*

Background Data & Need Identification

CDFI Friendly Bloomington (CFB) is committed to serving and working with LEP individuals across our region to bring additional community development investment through affordable housing, childcare, food security, green energy and small business expansion. Data show there is a need for LEP service provision in our region, and in four counties specifically where a language spoken at home (other than English) is 5% or higher. This includes Daviess, Dubois, Jackson and Monroe counties. Using these four counties as prominent examples, research shows additional need for language assistance services in the region served by CFB:

- In Daviess County, 6,374 residents speak a language other than English at home, with data showing that in addition to Spanish (3.4%), 16.8% of residents speak "other Indo-European languages" (see "Data Sources/Language Use in the US Population" for language definitions).

- In Dubois County, 2,731 residents speak a language other than English at home, with data showing that Spanish is the most prevalent language spoken other than English (5.5%)
- In Jackson County, 3,434 residents speak a language other than English at home, with data showing Spanish also being the most prevalent language spoken other than English (5.9%).
- In Monroe County, 13,652 residents speak a language other than English at home, with data showing more diversity in other languages spoken: Spanish (2.4%), other Indo-European (3.1%) and Asian & Pacific Islander languages (4.1%).

Monroe County is also the home of Indiana University's main campus and the region's largest city, Bloomington, with a population of approximately 85,000.

It should be noted that while certain counties had a higher percentage of English not being the primary language spoken at home, data showing that Limited English Proficiency not being as high is present. However, it is our goal to try to serve clients in their native or desired language to the fullest extent possible.

2022 American Community Survey (ACS) Data for CFB Region

Speak a language other than English at home (% and estimated number of residents):

Brown:	1.8% or 274
Crawford:	1.2% or 119
Daviess:	20.7% or 6,374
Dubois:	6.7% or 2,731
Greene:	2.0% or 591
Jackson:	7.9% or 3,434
Lawrence:	1.6% or 697
Martin:	1.6% or 148
Monroe:	10.2% or 13,652
Morgan:	1.9% or 1,277
Orange:	2.5% or 466
Washington:	2.0% or 525

Data Sources:

Diversity, Equity, Inclusion & Accessibility Issuance System, US Department of Treasury
<https://home.treasury.gov/system/files/306/DEIA-016-Treasury-Lang-Access-Plan.pdf>

Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, US Department of Justice
https://www.lep.gov/sites/lep/files/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

US Treasury Language Access Guidance
<https://www.govinfo.gov/content/pkg/FR-2005-02-04/pdf/05-2156.pdf>

US Census Bureau/American Community 2022 Survey Linguistics Use Data
<https://www.census.gov/acs/www/about/why-we-ask-each-question/language/>

Language Use in the U.S. Population (includes language lists and definitions of Census language terminology)
<https://www.census.gov/topics/population/language-use/about.html>



CFB Board Approval

These policies and procedures are hereby approved by the CDFI Friendly Board of Directors on the **23rd day of May, 2024.**

CDFI Friendly Bloomington

By:



Tina Peterson
President, CFB Board



CDFI Friendly Bloomington Employee Policy Review Affirmation

By signing below, I certify that I have read this Language Assistance Plan (LAP) policy for this organization, including the requirements for training and the procedures within, and will work to provide services as needed by potential clients of CDFI Friendly Bloomington.

Employee/Board Member Signature

Date