

EMPOWERING PEOPLE REVITALIZING THE COMMUNITY

### **LAEDA Business Capital Solutions**

# Language Assistance Plan (LAP)

Effective Date: July 1, 2025 Last Reviewed: July 1, 2025 Next Review: July 1, 2026

## **1. Policy Statement**

LAEDA Business Capital Solutions ("LAEDA BCS") is committed to ensuring meaningful access to our financial products, programs, and services for all clients, including individuals with Limited English Proficiency (LEP). In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, LAEDA BCS will provide language assistance services—free of charge—to LEP individuals to ensure equitable access to all aspects of our portfolio, including loan applications, technical assistance, training programs, and customer service.

## 2. Definitions

- **LEP Individual:** A person who does not speak English as a primary language and who has a limited ability to read, speak, write, or understand English.
- Language Assistance Services: Oral and written language services provided to clients during intake, program enrollment, financial counseling, and other interactions. These include:
  - **Translation:** Converting written text from English into the client's preferred language.
  - **Interpretation:** Oral communication assistance between English-speaking staff and LEP clients, either in-person or via telephonic/video platforms.

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## 3. Four-Factor Analysis

LAEDA BCS's annual assessment of LEP needs, using the U.S. Census American Community Survey, internal client records, and program encounter data, considers:

#### 1. Number and Proportion of LEP Clients Served

 Spanish: ~27% of current borrowers and workshop attendees, with the balance speaking English.

#### 2. Frequency of Contact

- Loan intake: high frequency
- Technical assistance sessions: moderate frequency
- Customer support helpline: variable, trend increasing

#### 3. Nature and Importance of Services

 Critical to credit access, business planning, compliance with loan covenants, and ongoing technical assistance.

#### 4. Resources Available & Costs

- Annual budget allocation for language services: \$5,000
- Pre-vetted roster of professional translators and interpreters

## 4. Scope of Services

#### 4.1 Written Translation

- **Core Documents:** Loan applications, promissory notes, program enrollment forms, key disclosures, and financial literacy materials will be available in full Spanish.
- **Supplemental Materials:** Upon request, Portuguese and Haitian Creole translations of core documents within 5 business days.

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• **Process:** Clients request translated materials by contacting the Language Access Coordinator (LAC) via phone or email.

#### 4.2 Oral Interpretation

- In-Person & Virtual Meetings: Professional interpreters arranged at no cost for scheduled loan consultations, technical workshops, and training sessions.
- **Telephonic/Video Interpretation:** On-demand telephonic/video interpreting available during business hours for customer service inquiries.

## **5. Notice to the Public**

• Website & Digital Platforms: Banner on LAEDA BCS's homepage reading:

*"Language assistance services are available free of charge. For help in Español, please call (856) 338-1177 or email <u>lap@laeda.com</u>. LAEDA Business Capital Solutions Language Access Plan can be accessed here" (hyperlink to PDF of the document)* 

- **Printed Materials & Signage:** "I Speak" posters in English, Spanish, Haitian Creole, and Portuguese displayed in reception areas and partner locations.
- **Outreach & Marketing:** All event flyers, invitations, and social media posts will include a language-assistance notice in English and Spanish.

## 6. Roles & Responsibilities

#### 6.1 President & CEO

- Ensure organizational commitment and adequate funding for LAP implementation.
- Review annual LAP reports and approve updates.

#### 6.2 Language Access Coordinator (LAC)

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- Name & Title: [To be appointed], Manager of Community Engagement
- Duties:
  - Oversee daily administration of LAEDA BCS's LAP.
  - Maintain up-to-date lists of qualified translators and interpreters.
  - Monitor budget and authorize expenditures for translation and interpretation.
  - Track and fulfill all LEP service requests.
  - Produce quarterly usage reports for senior leadership.

#### 6.3 Program Managers & Front-Line Staff

- Identify LEP needs during client intake and event registration.
- Distribute "I Speak" cards and intake forms.
- Refer LEP individuals to the LAC for timely language assistance.
- Attend annual training on LEP protocols.

## 7. Staff Training

- Initial Onboarding: All new employees receive LEP awareness and Title VI training as part of orientation.
- Annual Refresher: Mandatory 1-hour webinar covering:
  - Recognizing LEP needs
  - Process for requesting translation/interpretation
  - Proper use of "I Speak" materials
- **Bilingual Staff Certification:** LAEDA BCS bilingual employees may serve as in-house interpreters following language proficiency testing and interpretation ethics training.

## 8. Monitoring, Evaluation & Reporting

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- **Data Collection:** LAC logs all language-service requests, types of service provided, and turnaround times in the LAP database.
- **Client Feedback:** Brief surveys offered post-service to assess satisfaction and identify gaps.
- Annual Review: By July 1 each year, LAC analyzes:
  - 1. Number of LEP requests by language
  - 2. Average response/fulfillment time
  - 3. Feedback on service quality
  - 4. Updated ACS demographic data
- **Reporting:** LAC delivers an annual LAP report to the President & CEO and Board, including recommendations for adjustments.

### 9. Continuous Improvement

- Expand written translations to Portuguese and Haitian Creole if LEP demand exceeds 5% of total requests.
- Develop multilingual video tutorials for online loan applications.
- Partner with local community-based organizations to raise awareness of language services.
- Allocate additional budget in Year 2 based on usage trends.

## **10. Contact Information**

For language assistance or inquiries about this plan: **Language Access Coordinator** LAEDA Business Capital Solutions Phone: (856) 3385-1177 Email: lap@laeda.com

**Note:** This Language Assistance Plan is a living document and will be updated to reflect changes in client demographics, program offerings, or regulatory requirements.

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