



Language Assistance Plan

Revised May 2024

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I. INTRODUCTION

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order No. 13166, “Improving Access to Services for Persons with Limited English Proficiency”, Pacific Community Ventures (PCV) has established the following Language Assistance Plan (LAP) to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our organization. “LEP individuals” are defined as “individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English”¹. The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals in order to ensure equity and inclusion across PCV’s clients. This is essential to our mission of supporting small business owners and their communities in the fight for economic, racial, and gender justice.

In creating this plan, PCV consulted guidance from the U.S. Department of the Treasury in its “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons”. PCV used the recommended Four-Factor Analysis:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by PCV
2. The frequency with which the LEP individuals come in contact with PCV
3. The nature and importance of the program, activity, or service provided by PCV to people’s lives
4. The resources available and costs to PCV

II. LANGUAGE ASSISTANCE PLAN OVERSIGHT

PCV’s Marketing and Communications team will be responsible for overseeing the implementation of this plan. As such, they are responsible for monitoring and updating the following information necessary for effective language assistance:

- Staff Directory listing designated bilingual staff members
- Contact information for approved external translation and interpretation services
- Vital documents needed for translation
- Vetted community partnerships that can offer language assistance
- Staff training materials on LEP policies and procedures

¹ <https://www.lep.gov/node/3456>

In addition to their oversight duties, the Marketing and Communications team will be charged with maintaining and updating this plan at least annually, or as the need for changes arises. The Marketing and Communications team will report to PCV leadership and will coordinate with lending and advising teams in order to carry out the directives established by this plan.

III. IDENTIFICATION AND ASSESSMENT OF LEP COMMUNITIES

In order to identify LEP individuals in our community, we consulted data from the California Language Map available on the [LEP.gov website](#) (as PCV is a California statewide lender). Based on this data, we have identified LEP populations in our eligible market to be persons who speak Spanish (66.76% of LEP population), Chinese² (8.73% of LEP population), Vietnamese (4.58% of LEP population), Tagalog (3.79% of LEP population), and Korean (3.22%). An analysis of our Annual Impact Survey data also shows the same languages as primarily used by LEP individuals in PCV's client portfolio.

As our community evolves over time, we will continue to monitor shifts in our population's demographics through an annual assessment to ensure that we are adequately tracking LEP representation in our communities. We will also work to identify LEP individuals in our normal encounters with clients by:

- Responding to individual requests for language assistance services;
- Collecting and recording primary language data from individuals when they first engage with our programs and services (e.g., informational calls, intake forms)

IV. PROVIDING LANGUAGE ASSISTANCE SERVICES

It is our understanding that these LEP individuals may interact with our staff in a number of ways:

- Outreach events
- Informational calls
- Email communication
- Public access to the PCV website

Due to the variety of encounters that LEP individuals may have with our agencies, a variety of language assistance services will be provided and advertised to these individuals. To determine the extent of language assistance services provided, we relied on our Four-Factor Analysis and

² For Chinese languages, PCV's community is mainly composed of Cantonese and Mandarin speakers.

identified the following groups as meeting the 1,000 or 5% LEP threshold for the provision of language assistance services.

- Spanish (66.76% of LEP population),
- Chinese (Cantonese and Mandarin) (8.73% of LEP population),
- Vietnamese (4.58% of LEP population),
- Tagalog (3.79% of LEP population),
- Korean (3.22% LEP population).

For these LEP populations, both oral and written language assistance services will be provided.

ORAL LANGUAGE ASSISTANCE

Oral language assistance may be necessitated by encounters with LEP individuals. As phone communication is the primary oral communication for PCV staff interacting with clients, the following protocol will be followed:

The staff member will first make an effort to identify the primary language of the individual. If that staff member is designated as bilingual in the individual's primary language by the organization, then that staff member may assist the LEP individual directly. If the staff member has not been designated as bilingual in that language, then that staff member will transfer the call to another staff member who has been designated as bilingual, as listed in the Staff Directory. If no bilingual staff member is available to assist the individual, then the staff member will reach out to the telephone translation service approved by the organization and arrange a call with the LEP individual. Staff members are trained at onboarding on how to access the appropriate translation service and can reach out to the Marketing and Communications team for further assistance.

If the client is a direct referral from a partner organization who specializes in the client's primary language, the staff member may also reach out to the partner organization for assistance with translation.

As of May 2024, PCV has bilingual staff who can support clients in the following languages:

- Spanish
- Vietnamese
- French
- Hindi
- Tagalog

- Arabic
- Lao
- Portuguese

WRITTEN LANGUAGE ASSISTANCE

Written language assistance may be necessitated for a number of documents, notices, advertisements, forms, etc. “Vital documents” will be translated proactively and made accessible to the LEP communities previously identified. Documents will be classified as “vital” by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences associated with the document, and organizational resources. For PCV’s lending program, these “vital documents” include the full Loan Application Form and Credit Authorization Form. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Documents not considered vital will be available for oral or written translation upon request.

In addition to vital documents, PCV staff will also make an effort to translate or provide an interpretation option for essential communications pertaining to a client’s loan. Staff members will either translate the essential notice themselves (if they are designated as bilingual), ask for the assistance of a designated bilingual staff member, or use an approved translation service.

V. GUIDELINES FOR INTERPRETERS AND TRANSLATORS

While no formal certification is required for interpreters, translators, or staff members listed in the Staff Directory as bilingual, individuals providing interpretation or translation services must:

- Be proficient in and able to communicate information accurately in both English and the other applicable language;
- Understand PCV-specific terminology
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator;
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

LEP individuals may bring another individual to provide interpretation who has not been designated for formal interpretation services by PCV. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided;

- Use a formal interpreter instead of the informal interpreter, especially if the subject matter of the encounter may be prone to conflicts of interest;
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need.

When working with an interpreter, formal or informal, PCV staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed;
- Briefly explain to the interpreter technical terms that may come up during the communication;
- Avoid the use of acronyms, double negatives, and contractions;
- Speak in short sentences that contain one idea at a time;
- Talk to the applicant and not to the interpreter;
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.

VI. TRAINING OF STAFF ON LEP POLICIES AND PROCEDURES

All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of new employee onboarding, and a refresher training will be provided annually at a designated staff meeting. After completion of the training, staff should understand:

- Their obligation to provide meaningful access to information and services to LEP individuals;
- The protocol for handling various encounters with LEP individuals, as established by this plan;
- How to use the Staff Directory to identify designated bilingual staff members;
- How to access translated materials and interpretation services for provision to LEP individuals.

Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals.

VII. PROVIDING NOTICE OF LANGUAGE ASSISTANCE SERVICES

To ensure that members of LEP communities are aware of the free language assistance services provided to them, the following marketing and outreach steps will be taken:

- Provide notification of services with intake materials in the languages specified in Part III.
- Publish translated outreach materials used by staff in community tabling events
- Update non-English content on the PCV's website;
- Publish notices in non-English media about programs and services offered;
- Work with community-based organizations and other stakeholders to inform LEP individuals of the recipients' services, including the availability of language assistance services.

VIII. MONITORING, EVALUATING, AND UPDATING THE LANGUAGE ASSISTANCE PLAN

As part of their responsibilities, the Marketing and Communication team will monitor and evaluate the effectiveness of this plan and make updates to PCV's language assistance services accordingly. To do this, they will make use of the following mechanisms:

- Survey staff on how often language assistance services are used and how they could be improved;
- Keep track of community demographics by analyzing language data from program intake forms and PCV's Annual Impact Survey
- Solicit feedback from community-based organizations and other stakeholders;
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- Monitor PCV's response rate to suggestions or requests by LEP individuals;
- Maintain a record of available services for LEP individuals and the frequency of their use.