

Our Neighborhoods Capital Fund Language Access Plan

About Our Neighborhoods Capital Fund

Our Neighborhoods Capital Fund's mission (ONCF) is to deploy resources towards the goal of achieving an inclusive economy with fair, equitable access to capital for all, and preserving Asian American and Pacific Islander (AAPI) historic and cultural districts as economic drivers in local economies. ONCF will deploy capital to non-profit borrowers for the specific purposes of supporting the real estate development of community and commercial spaces that help low- and moderate-income (LMI) individuals, businesses, and non-profits to remain in their communities of choice.

ONCF is a subsidiary corporation of the National Coalition for Asian Pacific American Community Development (National CAPACD). National CAPACD established ONCF to further its community development mission to advance equity and create vibrant, healthy neighborhoods by mobilizing and strengthening a powerful coalition of Asian American, Native Hawaiian and Pacific Islander community-based organizations working in low-income communities. National CAPACD's members operate in the most expensive real estate markets in the U.S. - stabilizing cultural districts and creating places of belonging that celebrate cultures and act as a critical safety net to the most vulnerable.

ONCF is a vehicle for driving inclusive economic growth and increasing access to capital for AAPI historic and cultural districts that face the greatest risk of displacement. A growing number of National CAPACD members are utilizing property acquisition and development as a strategy to prevent community displacement, but face the challenges of unprecedented speed of gentrification and decades of underinvestment. Gaps remain in financing tools available locally and nationally to support community or commercial real estate development - particularly for AAPI communities. ONCF was established to fill this gap. ONCF fills a critical gap in financing for community development purposes because no other AAPI-focused national CDFI exists.

I. Introduction

For over two decades, ONCF's parent organization, National CAPACD, has been an advocate for language access for AAPI communities in accessing programs, services and opportunities to build economic opportunity. AAPIs represent one of the fastest growing

demographics in the United States, and therefore, translation and interpretation is absolutely essential to meet their capital needs. According to the 2020 American Community Survey, approximately 32% of Asian Americans and 12% of Native Hawaiian and Pacific Islanders identified as Limited English Proficient. In fact, 20% of Asians and 5% of Native Hawaiian and Pacific Islanders identify as linguistically isolated - meaning there is no one in the household over the age of 14 who speaks English exclusively or 'very well'. Ensuring language and culturally responsive services requires meaningful community engagement and an ongoing commitment to monitoring program effectiveness - primarily because there are dozens of AAPI languages and dialects that are spoken in AAPI communities here in the US and the number of languages only continues to grow.

National CAPACD has become adept at ensuring information and resources are available in-language to its target population and will extend that knowledge and best practices to its subsidiary, ONCF. This Language Access Plan operationalizes ONCF's and National CAPACD's steadfast and continued commitment to inclusion and equitable access to financial products and services for those with limited English proficiency.

Our Neighborhood Capital Fund's programs and services are offered to the Targeted Populations of non-profit development and service organizations across the country serving low-income AAPI communities. ONCF's national target market includes the following:

- Low-Income Targeted Population that serves Asian American and Pacific Islander communities or individuals in economically distressed areas.
- Other Targeted Population (OTP): Other Pacific Islander, Filipino, and Vietnamese.

ONCF will be serving low-income AAPI communities across a diverse range of geographic areas and will serve populations with unique characteristics and needs. These market areas encompass various regions with significant AAPI populations, with dozens of AAPI languages represented, and thus underscores the importance of ensuring culturally competent language access. Through this plan we will eliminate or reduce barriers to our services, products and programs for those who have limited English proficiency.

II. Language Assistance Policy:

Our Neighborhoods Capital Fund affirms our commitment to language access to ensure that Limited English Proficient individuals have equal access to our financial products and services. This commitment aligns with the principles of Title VI of the Civil Rights Act of 1964, emphasizing nondiscrimination in programs and activities receiving federal financial assistance. ONCF employees, and those of its parent organization, shall take reasonable steps to provide LEP individuals with meaningful access to all products, services, and

programs offered by ONCF. This policy is based on the principle that it is the responsibility of ONCF and not the LEP person to take reasonable steps to ensure that communications between ONCF and the LEP person are not impaired as a result of the limited English proficiency of the individual. ONCF will take reasonable steps to effectively inform the public of the availability of language accessible programs and activities.

III. Identification of Language Needs:

There are currently dozens of Asian American and Pacific Islander languages spoken in the communities served by the Our Neighborhoods Capital Fund, and in fact, the list of languages only continues to grow. This dynamic is a result of US immigration and foreign policy - and thus, it requires ONCF to be agile in its response to changing community needs.

To proactively identify the language needs of its target population, ONCF works with its parent organization National CAPACD to conduct regular surveys and community engagement events with AAPI-serving organizations across the country. National CAPACD regularly gathers information from its network of AAPI community-based organizations on the language needs of both its staff and the communities they serve in the form of: membership applications, sub-grant applications, event surveys and one-on-one meetings. In collecting this information, ONCF and National CAPACD are able to anticipate language assistance needs and design culturally and linguistically responsive services that best meet the needs of the target population.

Additionally, ONCF will identify people who are LEP persons through communication in person, in writing (including via electronic correspondence such as email), or by telephone/video conferencing.

- **In person.** ONCF has posted a Language Helper/"I Speak" poster in its reception areas, which is a tool for an LEP person to communicate the language the person speaks. ONCF Fund staff will direct people to the I Speak poster when it is apparent that they are having difficulty speaking or understanding English. The staff member will then utilize the language services described in this Plan.
- **In writing.** If a staff member receives a written communication (including via electronic correspondence such as email) in a foreign language, the staff member will contact the translation companies with which National CAPACD/ONCF is contracted to assist with translating the document.

- **Telephone/video conferencing.** If a staff member receives a telephone call from a person who speaks a foreign language, the staff member will use a telephone interpreting service described below.

Record keeping. When staffers are likely to have repeated contacts with a person who is LEP (e.g., borrower or client relationship), staff members will make appropriate notations in their files identifying the person as LEP, indicating the language spoken, and listing the language assistance tools requested and utilized.

IV. Language Assistance Services:

ONCF will provide the following language assistance services in the languages needed by its target population:

1. Oral Language Assistance - Interpreting

Interpretation is the act of listening to something in one language and verbally translating it into another language. ONCF offers language interpreting services to all persons with LEP at no cost to the person with LEP.

- ONCF staff will offer an interpreter as soon as it is apparent that a person has a limited ability to read, write, speak, or understand English. An LEP person who is a companion of a person seeking services from the ONCF may also request interpreting assistance.
- Interpreters will be scheduled as quickly as possible.
- Any staff member making the determination that an interpreter is needed may make the arrangements.
- All requests for interpreters, written or oral, will be documented in the appropriate paper and electronic files.
- If staff will be discussing documents with a person with LEP, they will give the interpreter adequate opportunity to review the documents prior to the discussion, and any questions about the documents will be addressed. Staff will discuss any specialized terms with the interpreter.

ONCF/National CAPACD contracts with a variety of translation and interpretation companies across the United States to cover the variety of language needs that exist within AAPI communities and various geographies to accommodate various time zones. Interpretation for foreign languages can be provided over the phone or via video, including

for remote meetings (e.g. Zoom). Interpretation can also be provided for meetings occurring in-person with the client.

ONCF staff will be provided with the vetted roster of translation and interpretation companies that are used by National CAPACD. Staff will document all attempts to make interpretation arrangements in the client file.

2. Written Language Assistance – Translation

Translation is the act of converting written text in one language (source language) into the equivalent written text in another language (target language).

A “vital document” is any document that is critical for ensuring meaningful access to the organization’s major activities and programs by beneficiaries generally and LEP person specifically. ONCF does not have any “vital documents” that would determine whether or not a person can access ONCF services or prohibit their involvement.

While there is a loan application document, this is often not the first step in the financing process and interpretation of this document can be provided over the course of an underwriting process and using the services described above. Therefore, ONCF does not currently provide any translated documents. Oral language interpreters will be provided free of charge to any LEP person who needs assistance interpreting any ONCF document.

ONCF provides the following notice on its landing page on the website: “If you speak a language other than English, language assistance services, free of charge, are available to you. Please email info@nationalcapacd.org or call (202) 223-2442 to request interpretation.”

ONCF will provide this notice in the following five languages, which align with the needs most recently identified by National CAPACD’s members/ONCF’s target market: Chinese, Vietnamese, Korean, Hmong, Khmer.

3. Staff Training

Staff members of both ONCF and its parent organization receive ongoing cultural competency training specific to AAPI communities. These trainings include content related to the historical context and current economic justice trends of AAPI communities being served, as well as specific language and cultural needs of emerging communities. This training will be included as part of New Employee orientation and refresher training will be provided at least annually to ONCF employees.

Educators, trainers and technical assistance providers will also be trained in culturally competent service delivery, as well as historical context and current trends that are impacting the Target Population.

V. Monitoring and Evaluation:

ONCF will employ regular assessments with the Target Population and feedback analysis to monitor the effectiveness of language assistance services. The results will inform adjustments to the plan to better meet the needs of LEP clients served by our programs.

ONCF will also continue to monitor its LEP services in light of state and federal requirements, changes to ONCF's documents and procedures, changes to the composition of the LEP population in ONCF's service area, and the effectiveness of its language translation services. This Plan will be updated periodically based on those findings.