



## Language Access Plan

### Plan Components

As a recipient of federal funding, NeighborWorks Capital is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons. Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The Chief Risk Officer is the designated management team member responsible for overseeing, developing, and modifying the language access plan and establishing and implementing any necessary operational procedures related to the plan.

NeighborWorks Capital's Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language.

Item #3: A description of how LEP persons are informed of the availability of language assistance service.

Item #4: A description of how the language assistance plan is monitored and updated.

Item #5: A description of how employees are trained to provide language assistance to LEP persons.

Item #1 – Results of the Four Factor Analysis
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### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.**

NeighborWorks capital serves the NeighborWorks America network of non-profit organizations throughout the 50 states, DC, and Puerto Rico. NeighborWorks Capital does not serve individual recipients or beneficiaries. Our products and services are delivered from our business entity to NeighborWorks America network business entities. We do not work directly with end consumers.

### **Factor 2: The frequency with which LEP persons come into contact with the program.**

Because NeighborWorks Capital serves other businesses, and not individuals, we are not in direct contact with LEP persons with any measurable frequency.

### **Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

NeighborWorks Capital is a lending intermediary that provides loans to NeighborWorks America network non-profit organizations to enable and facilitate their development of affordable housing and community-serving commercial real estate. NeighborWorks America network organizations then work directly within communities to provide affordable rental and ownership housing construction, repair and financing, financial counseling, resident engagement, and equitable community development to stabilize communities and improve the lives of low-income residents. NeighborWorks Capital does not work with or communicate directly with the individuals or communities who receive these services from NeighborWorks America organizations.

**Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.**

Because NeighborWorks Capital does not work directly with individuals, but rather with the business entities that comprise the NeighborWorks America network, there is no demonstrated need for LEP outreach.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

Because NeighborWorks Capital does not work directly with individuals, but rather with the business entities that comprise the NeighborWorks America network, there is no demonstrated need for language assistance services.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

Because NeighborWorks Capital does not work directly with individuals, but rather with the business entities that comprise the NeighborWorks America network, there is no demonstrated need for language assistance services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Because NeighborWorks Capital does not work directly with individuals, but rather with the business entities that comprise the NeighborWorks America network, there is no demonstrated need for language assistance services.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Because NeighborWorks Capital does not work directly with individuals, but rather with the business entities that comprise the NeighborWorks America network, there is no demonstrated need for language assistance services.