

Forward Community Investments, Inc. Language Access Plan for Limited English Proficient Individuals

May 2024



Forward Community Investments Inc., Language Access Plan for Limited English Proficient Individuals

Forward Community Investments, Inc. (FCI) is a Certified Community Development Financial Institution (CDFI) based in Wisconsin. As a Community Development Loan Fund, FCI provides flexible financing and development services to businesses, organizations, and individuals focused on making investments in disinvested communities.

FCI focuses on deploying dollars to nonprofit organizations and diverse or emerging developers across Wisconsin that help advance our mission of reducing social, racial, and economic disparities across the state of Wisconsin. Our vision is an inclusive Wisconsin built on cooperative social action, realized by mission-driven organizations and initiatives that work to reduce racial, social, and economic disparities.

The purpose of this plan is to identify the responsibilities of FCI for providing Limited English Proficient (LEP) individuals with meaningful access to vital documents and information about relevant FCI programs and services per Executive Order 13166 and Title VI of the Civil Rights Act of 1964. The following information discusses the translation services available and a brief description of FCI's programs and customers, as well as future plans to serve LEP individuals.

FCI Customers

The volume of services to LEP individuals is extremely small because FCI works with businesses and nonprofit organizations and not directly with individual borrowers. In our sole service area, Wisconsin, only 3.0% of people surveyed in the 5-year 2016 ACS survey indicated they speak English less than very well.¹ Given both our core borrowers (i.e., nonprofit organizations and businesses) coupled with our the statistically small proportion of individuals in Wisconsin who speak English less than very well, there is a small potential group of customers who may need language assistance services.

FCI Policy

FCI strives to make all information about our products and services available to any potential customer regardless of what language they speak. It is the policy of FCI not to discriminate against any person who is Limited English Proficient (LEP). In accordance with Title VI of the Civil Rights

¹ This is 5.3% percentage points lower than the United States as a whole. Source: <https://www.census.gov/acs/www/about/why-we-ask-each-question/language/>



Act of 1964 and Executive Order 13166, FCI will take all reasonable steps to provide LEP persons meaningful access to product information upon request.

LEP persons may request relevant materials from FCI via our website. When needed, FCI provides language assistance through one of our bi-lingual staff members or local municipal partners, other FCI network partners specializing in providing services in the language requested, or a third-party vendor free of charge to the customer.

Upon request and within reasonable time restraints, FCI will provide translations of our information into Spanish or other languages.

Assessment of Need

The following areas within FCI have public contact:

- FCI Website
- Business development activities (e.g., phone calls, conferences, and emails)
- Printed product information²

FCI's Director of Marketing & Communications works closely with our Community Lenders and other external facing FCI staff members to determine the need for any additional language translation needs on our website or printed materials.

FCI's Chief Operations Officer will annually review the LAP with senior management, the Director of Lending, and Director of Marketing & Communications to assess if demand is met.

Assistance for LEP Individuals

FCI provides the following for LEP individuals:

- Spanish fact sheets about funds particularly focused on Hispanic borrowers
- Upon request, translation services of materials into Spanish or other languages for any FCI product fact sheets or services.
- FCI has multiple bi-lingual staff members who are available to speak directly with potential borrowers in Spanish upon request.

Public Meetings

FCI does not conduct meetings for the public.

² Our printed information is limited as most of our current organization and printed information is located online.



Demographics

FCI keeps current on shifting populations and needs through an annual survey of our borrowers and ongoing interactions with community stakeholders. Additionally, FCI staff reviews specific products and funds targeted towards providing capital access to individuals who may be more likely to need language assistance to ensure all materials are printed and otherwise provided in the language they are most comfortable interacting in.

Written Translations

Upon request and within reasonable time restraints, FCI will provide translation of its documents free of charge. FCI will decide how to allocate its resources for translation services based on relevance, time, or cost restraints. FCI will provide services through municipal assistance, nonprofit partners specializing in providing translation services in the language requested, or through a contracted vendor. All requests go through FCI's Director of Lending.

Responsible Staff

FCI's leadership provides guidance and information to staff regarding FCI's responsibility to LEP individuals through regular verbal updates during in-person and virtual meetings during the regular course of business. The Director of Lending working with the Director of Marketing & Communications works closely with the Chief Operations Officer to identify resources for LEP individuals in the event FCI does not currently offer the information in question in the language requested.

Nondiscrimination and Civil Rights Information

FCI provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, FCI would use a third-party vendor to translate. FCI will also monitor any and all feedback submitted regarding LEP Services through our website contact forms. In addition, the Nondiscrimination and Civil Rights Information currently lists the e-mail address which accepts discrimination complaints.

Information for the General Public

FCI posts information on receiving translation services on our website at <https://www.forwardci.org/language-assistance-notice/> in both English and Spanish.

