

CAHEC Capital, Inc. Language Assistance Plan for Individuals with Limited English Proficiency

I. Introduction

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 entitled “Improving Access to Services for Persons with Limited English Proficiency”, CAHEC Capital, Inc. (“CAHEC Capital”) developed this Language Assistance Plan (“LAP”) to ensure that persons with limited English Proficiency (“LEP”) have access to CAHEC Capital’s resources and services.

To develop this plan, CAHEC Capital utilized the four-factor analysis prescribed in the Department of the Treasury’s “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” as published in 70 Fed. Reg. 6067 (February 4, 2005).

The following four factors were considered in the development of this plan:

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

II. Assessment and Measures

Factor 1 – LEP Population in CAHEC Capital’s service area

CAHEC Capital’s office is located in Raleigh, North Carolina and its current service area includes Alabama, District of Columbia, Florida, Georgia, Kentucky, Maryland, Mississippi, North Carolina, Pennsylvania, South Carolina, Tennessee, Virginia, and West Virginia.

Based on American Community Survey data¹, 84% of residents in CAHEC’s service area speak only English. Of the 16% that speak more than one language, 38% (6% of total population) identified as speaking English less than “very well”. The most common languages for LEP individuals in CAHEC Capital’s service area are:

¹ U.S. Census Bureau. "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B16001, 2022, <https://data.census.gov/table/ACS5Y2022.B16001?q=B16001&g=040XX00US01,11,12,13,21,24,28,37,42,45,47,51,54>. Accessed on August 1, 2024.

Language	Estimated LEP Population	% of Estimated LEP Population	% of Estimated Service Area Population
Spanish	3,688,232	67%	4.00%
Chinese (including Mandarin and Cantonese)	216,908	4%	0.24%
Haitian	188,448	3%	0.20%
Vietnamese	170,787	3%	0.19%
Korean	114,099	2%	0.12%
Arabic	95,839	2%	0.10%
Portuguese	87,366	2%	0.09%
French (including Cajun)	84,540	2%	0.09%

Additional languages individually represent 1% or less of the LEP population.

Factors 2 and 3 – Frequency of Encounters with LEP individuals and Importance of Programs, Services, and Activities on People’s Lives

CAHEC Capital’s interaction with and services for the public and LEP individuals is extremely limited because CAHEC Capital works primarily with real estate development companies, financial institutions, and community development organizations. CAHEC Capital does not provide small business or consumer finance and is not a provider of services to the public.

Historically, CAHEC Capital has had very limited interaction with or inquiries from the public and LEP individuals via telephone, e-mail, or in-person. This limited interaction is expected to continue.

Factor 4 - The resources available to CAHEC Capital and costs to provide LEP assistance

CAHEC Capital is committed to take reasonable steps to ensure that LEP individuals have meaningful access to its financial products and programs. CAHEC Capital will determine how to allocate resources based on a reasonableness standard considering relevance, time, and cost constraints.

III. Language Assistance Measures

CAHEC Capital will undertake the following language assistance measures:

1. Explore options to provide telephonic or video oral interpretation services through a contracted third-party vendor.
2. Add a translation capability to its website.
3. Written translation services will be provided based on relevance, time, and cost constraints.

IV. Staff Training

Staff engaged in activities on behalf of CAHEC Capital will receive LAP training annually and during onboarding for new employees.

V. Providing Notice to LEP Persons

The LAP will be posted for public access on CAHEC Capital’s website and in visible locations in CAHEC Capital’s office.

VI. Monitoring and Updating this LAP

CAHEC Capital monitors and updates the LAP annually to evaluate its effectiveness in serving LEP individuals and modifies it accordingly. The evaluation uses the four-factor analysis described above and considers changes to CAHEC Capital’s service area population, encounters with LEP individuals, customers, programs, services, and capacity.

Implementation, coordination, and monitoring of all activities required under the LAP shall be the responsibility of CAHEC Capital’s Director, Community Capital.

VII. Revision History

Changes made to any information within this LAP are outlined in the table below to ensure CAHEC Capital properly tracks all versions and modifications made.

Version #	Revision Description	Date of Revision	Approver