

Language Access Plan (LAP) for Black Hills Community Loan Fund (BHCLF)

Introduction and Purpose

In compliance with [Title VI of the Civil Rights Act of 1964](#) and [Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency"](#), the Black Hills Community Loan Fund (BHCLF) has established the following LAP to ensure that individuals with limited English proficiency (LEP) may access all resources and services provided by our agencies. An "LEP individual" is defined as "an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English."

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 beneficiaries. This is essential to our mission of providing families with the tools and opportunities to strengthen and empower their financial well-being in the He Sapa Region. The BHCLF is a Native Community Development Financial Institution (CDFI) certified by the U.S. Department of Treasury. The BHCLF is an Urban Native CDFI serving the South Dakota counties of Butte, Custer, Fall River, Pennington, and Meade.

Persons Charged with Implementing the Plan

The Executive Director or her designee will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, the Executive Director or her designee will be charged with maintaining and updating this plan as the need for changes arises.

Identification and Assessment of LEP Communities

In order to identify LEP individuals in our community, we consulted data from the American Community Survey "Language Spoken at Home" tables. These tables identified the following data:

County	Percent speak English at least "very well."	Primary Language spoken is spoken by individuals who speak English less than "very well."	Secondary language spoken by Individuals who speak English less than "very well."
Butte County	99.3%	Spanish	None
Custer County	99.6%	Spanish	Asian and Pacific Islander
Fall River County	98.2%	Spanish	Asian and Pacific Islander
Meade County	99.0%	Spanish	Asian and Pacific Islander
Pennington County	99.0%	Asian and Pacific Islander	Spanish
Average	99.2%		
U.S. Census Bureau. "Language Spoken at Home." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601, 2022.			

We will also work to identify LEP individuals in our normal encounters with the public by

- Responding to individual requests for language assistance services;
- Relying on self-identification by the non-English speaker or LEP individual; and
- Using “I Speak” language identification cards or posters.

Language Assistance Services

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

- Participation in Loan Programs; and
- Outreach programs.

As a Native CDFI, the BHCLF rarely engages with non-English proficient speakers. On average, the BHCLF 99.2% of the target population speaks English at least “very well.” However, the BHCLF recognizes that individuals with Limited English Proficiency may engage with the BHCLF in accordance with the following:

Oral Language Assistance

Oral language assistance may be necessitated by encounters with LEP individuals either over the phone or in person. If one of these encounters occurs, staff members will carry out the following protocol:

For communication over the phone:

The staff member will first make an effort to identify the primary language of the individual. If that staff member is approved as bilingual in the individual’s primary language by the BHCLF, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will transfer the call to another staff member who has been approved as bilingual, as listed in the Staff Directory. If no bilingual staff member is available to assist the individual, then a telephone language translation service may be used to communicate with the LEP individual.

For communication in person:

The staff member will first make an effort to identify the primary language of the individual, using an “I Speak” language card if necessary. If that staff member is approved as bilingual in the individual’s primary language by the BHCLF, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will contact another staff member who has been approved as bilingual to come and assist the individual. If no bilingual staff member is available to assist the individual, then a telephone language translation service may be used to communicate with the LEP individual.

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. 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. At this time, due to the frequency of interactions with LEP individuals, the BHCLF does not have any documents classified as “vital.” Translated documents will also be accompanied with the following disclaimer:

“We are providing the translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document.”

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 CDFI-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 approved for formal interpretation services by the BHCLF. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided; and
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need.

When working with an interpreter, formal or informal, BHCLF 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.

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:

- Provide “I Speak” language identification cards to front office staff.

Training Staff on LEP Policies and Services

All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand.

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

Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the Executive Director or her designee will monitor and evaluate the effectiveness of this plan and make updates accordingly.