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BCL of Texas

Limited English Proficiency Plan

Adopted: July 31, 2018

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I. INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the BCL of Texas responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

II. PLAN SUMMARY

BCL of Texas has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

BCL of Texas understands the importance of ensuring that our services are accessible to LEP persons. In this plan, we outline measures that are currently being taken to provide language-accessible services, as well as future measures that may be taken should the need arise.

BCL Commitment to Providing Accessible Services

BCL of Texas will never limit services based on ability to speak English. We are committed to providing the resources necessary to assist LEP persons in their native language wherever possible.

III. RESOURCES AVAILABLE FOR LEP PERSONS

1. BCL of Texas Bilingual Staff

With a service area throughout the state of Texas and offices based in Austin and Dallas, Spanish is the most common language that LEP individuals speak. BCL of Texas is committed to providing Spanish language resources for our clients.

BCL of Texas office staff regularly come in contact with LEP persons, almost exclusively Spanish speakers, through phone calls and in-person services. In response to this need, we offer several of our most popular programs in Spanish.

BCL of Texas also makes it a priority to hire bilingual staff that can answer phone calls and provide program services in Spanish. As of July 2018, 6 of our 16 staff members are fully Spanish/English bilingual, including:

- Austin office:
 - Rosa Ríos Valdez, CEO
 - Pamela Guerra, HomeOwnership Specialist
 - Lindsay Ignatowski, Communications Coordinator
 - Flor Esquivel, Accounting Specialist
- Dallas office:
 - Eva Reyna, HomeOwnership Specialist
 - Cruz Correa, Community Loan Center Program Manager

The BCL of Texas Board of Directors does not regularly interact with BCL of Texas customers, including LEP persons.

Per item number 2 below, if translation or interpretation for languages other than Spanish is needed, it would be provided through a telephone/internet interpreter or translator for which BCL of Texas would pay a fee.

2. Outsourcing of Translation and Interpretation Services

BCL works with third-party companies such as *Communication By Hand* and others to provide translation and interpretation services on request. BCL of Texas is committed to offering these services on an as-needed basis.

3. Bilingual Marketing Collateral

BCL of Texas understands the importance of providing services that are accessible to LEP persons.

BCL of Texas HomeOwnership, Financial Coaching, and some Lending and Community programs are marketed in Spanish to LEP individuals through our bilingual Communications staff. Examples of bilingual marketing materials include websites, postcards, flyers, and co-marketing with community partners that serve Spanish-speaking clients.

Determination of whether to provide outreach and marketing materials in Spanish is based on geographic area and target market for each individual program or event.

Identifying an LEP person who needs language assistance:

- BCL's Executive Assistant, who is the first point of contact for most walk-ins and phone calls, will keep an LEP folder with the BCL of Texas LEP plan and the HUD language identification ("I SPEAK") cards to help LEP persons indicate their language needs. Additional cards may be accessed at: <https://www.lep.gov/ISpeakCards2004.pdf>
- Bilingual office staff in both Austin and Dallas offices will be provided with placards to indicate that they speak Spanish. These placards will be prominently displayed.
- All staff will be informally surveyed periodically on their experience and frequency concerning any contacts with LEP persons during the previous year.

Language Assistance Measures

The BCL of Texas staff will provide the opportunity for meaningful access to LEP clients who have difficulty communicating English. When an LEP person who needs language assistance is identified, BCL of Texas will use its 3-pronged approach as outlined above:

- Spanish/English bilingual staff
- Spanish/English bilingual marketing materials
- Third party outsourcing:
 - Language interpretation will be accessed through a telephone interpretation service/internet
 - Translation of documents will be provided upon request through a third-party translation service.

When staff prepares a document, advertisement or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire
- Description of language assistance services offered to the public
- Use of the "I Speak" cards
- Documentation of language assistance requests

V. MONITORING

Monitoring and Updating the LEP Plan

BCL of Texas will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every 5 years; or when it is identified that a higher concentration of LEP individuals are present in the BCL of Texas service area.

Updates will include:

- Determination of the current LEP population in the service area.
- The number of documented LEP person contacts experienced annually.
 - How the needs of LEP persons have been addressed.
 - Evaluation BCL's 3-pronged approach (Staff, Outsourcing, and Collateral) to meeting the needs of LEP individuals.

VI. DISSEMINATION OF BCL OF TEXAS LEP PLAN

This plan will be distributed to all BCL of Texas staff upon publication on July 31, 2018, or upon hire for new staff. This plan will be distributed to all staff again if and when updates are made. BCL of Texas partners, clients, and board members will have access to this plan upon request.

This plan will be available for view on the BCL of Texas website, www.bcloftexas.org.