

**GENESIS FUND LANGUAGE ACCESS PLAN**  
**[Updated June 13, 2022]**

**Introduction – Limited English Proficiency and Meaningful Access**

There are many people in the United States and in Northern New England for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they have limited English proficiency or “LEP” (here, “LEP persons”). Language for LEP persons can be a barrier to accessing important benefits or services or complying with applicable responsibilities.

The Genesis Fund is an equal opportunity provider, employer, and lender. The Genesis Fund is committed to complying with federal requirements in providing free, meaningful access for LEP persons and organizations. No LEP person will be denied access to a Genesis Fund program because the person does not speak English or communicates in English on a limited basis.

This Language Access Plan (LAP) is intended to facilitate communication with LEP communities and individuals in order that they may enjoy equal access to all of the Genesis Fund’s programs and opportunities. It is our intention and goal to remove barriers to accessing our services which are caused by a person’s limited English proficiency.

In order to ensure meaningful access to our programs and activities by LEP persons, we have undertaken an individualized analysis that assesses our responsibilities. That individualized assessment balances the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered; (2) the frequency with which LEP persons come in contact with the Genesis Fund; (3) the nature and importance of the Genesis Fund’s program, activity, or service; and (4) the Genesis Fund’s available resources. The assessment is attached as Appendix A.

**Identifying LEP Individuals Who Need Language Assistance**

In order to provide meaningful access to LEP persons, the Genesis Fund must first identify those who need language assistance. Genesis Fund staff may identify people who are LEP persons through communication in person, in writing, or by telephone.

- **In person.** The Genesis Fund has posted a Language Helper/“I Speak” poster in its reception area, which is a tool for an LEP person to communicate the language the person speaks. Genesis Fund staff will direct people to the I Speak poster when it is apparent that they are having difficulty speaking or understanding English. The staff member will then utilize the language services described in this Plan. For persons speaking in American Sign Language (“ASL”), this symbol may be used:



- **In writing.** If a staff member receives a written communication in a foreign language, the staff member will contact the Executive Director to determine the best way to proceed.

- **Telephone.** If a staff member receives a telephone call from a person who speaks a foreign language or ASL, or has a speech or language disability, and is having difficulty communicating in English, the staff member will use a telephone interpreting service described below.

**Record keeping.** When staffers are likely to have repeated contacts with a person who is LEP (e.g., borrower or client relationship), staff members will make appropriate notations their files identifying the person as LEP, indicating the language spoken, and listing the language assistance tools requested and utilized.

### **Oral Language Assistance – Interpreting**

Interpretation is the act of listening to something in one language and verbally translating it into another language. In the case of ASL, interpretation is the act of viewing language in sign language and verbally translating it into another language. In the case of certain hearing or speech disabilities, interpreters or facilitators can assist a person with effective communication. The Genesis Fund offers language interpreting services to all persons with LEP at no cost to the person with LEP.

- Genesis Fund staff will offer an interpreter as soon as it is apparent that a person has a limited ability to read, write, speak, or understand English. An LEP person who is a companion of a person seeking services from the Genesis Fund may also request interpreting assistance.
- Interpreters will be scheduled as quickly as possible.
- Any staff member making the determination that an interpreter is needed may make the arrangements.
- All requests for interpreters, written or oral, will be documented in the appropriate paper and electronic files.
- If staff will be discussing documents with a person with LEP, they will give the interpreter adequate opportunity to review the documents prior to the discussion, and any questions about the documents will be addressed. Staff will discuss any specialized terms with the interpreter.

The following types of oral interpreting services will be used:

#### *Telephone and Video Interpreter Services*

1. **Foreign Language Interpreting:** The Genesis Fund has entered into an agreement with Telelanguage (<https://telelanguage.com/>). Telelanguage provides interpretation in over 350 languages 24 hours per day, seven days per week, 365 days per year. Interpretation for foreign languages and ASL can be provided over the phone or via video, including for remote meetings (e.g. Zoom). Genesis Fund pays a per-minute charge for use of the line.
2. **Interpreters for hearing or speech disabilities:**
  - a. For telephone calls only, via Relay Service. The federal and state governments have established free Relay services to provide persons with communication disabilities access to landline phone service. This service can be accessed by dialing 711 or via the internet. 711 automatically connects to a relay operator. It provides persons with

hearing or speech disabilities with access to communication supports or ASL interpreters. The service allows consumers to use specialized equipment (such as captioned telephone, TTY, VCO, or HCO) to communicate with standard voice telephone users through specially trained relay operators. Maine Relay Service is available 24 hours a day, every day, 365 days a year.

- b. For video or in-person communication, the Telelanguage service described above may be used. The Genesis Fund Zoom account may also be used with closed captioning.

Genesis Fund staff will use either the Telelanguage line or Relay Service as follows:

- When it is not possible to communicate effectively with a person on the telephone or when the caller requests an interpreter;
- To identify the language being spoken by an individual if unable to do so in another fashion; and
- In order to communicate that an appointment will be set up and an interpreter provided.

Staff who frequently answer the phone and who perform outreach activities will keep a copy of the Telelanguage information near their phone and will utilize it when using telephone interpreting.

Staff will document all attempts to make interpretation arrangements and may track data using the Interpreter/Translator Requests Documentation Form, attached as Appendix B.

### **Written Language Assistance – Translation**

Translation is the act of converting written text in one language (source language) into the equivalent written text in another language (target language).

A “vital document” is any document that is critical for ensuring meaningful access to the organization’s major activities and programs by beneficiaries generally and LEP person specifically.<sup>1</sup> The Genesis Fund does not have any “vital documents” that would determine whether or not a person can access Genesis Fund services or prohibit their involvement.

While there is a loan application document, this is often not the first step in the financing process and interpretation of this document can be provided over the course of an underwriting process and using the services already described. Therefore, the Genesis Fund does not currently provide any translated documents. Oral language and ASL interpreters will be provided free of charge to any LEP person who needs assistance interpreting any Genesis Fund document.

The Genesis Fund website allow users to translate any page on the site to a foreign language using Google Translate.<sup>2</sup> The Genesis Fund recognizes that Google Translate does not always provide accurate translations. The Genesis Fund provides the following notice on its website: “If you speak a language other than English, language assistance services, free of charge, are available to you. Please email

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<sup>1</sup> US Department of Agriculture Rural Development Limited English Proficiency (LEP) Implementation Strategy for Federally Assisted Programs, downloaded from <https://www.rd.usda.gov/files/RDLEPImplementationStrategyforFederallyAssistedPrograms.pdf> on June 3, 2022.

<sup>2</sup> <https://translate.google.com/?hl=en&tab=rT&sl=auto&tl=en&op=websites>

[info@genesisfund.org](mailto:info@genesisfund.org) or call (207) 844-2035 to request interpretation.” The Genesis Fund will provide this notice in Spanish and French, which are the languages with the highest numbers of LEP persons in the Genesis Fund’s service area.

### Training

Genesis Fund staff will be trained in this Plan and the resources available to staff and LEP persons as a part of their new employee orientation and after any substantive changes.

The general procedure for staff when using an interpreter shall be:

- State the purpose of your communication and describe the type of information you may convey.
- Speak in short sentences, expressing one idea at a time and allow the information to be interpreted.
- Speak to LEP client and not to the interpreter.
- Avoid using acronyms. If you must do so, please explain their meaning, providing brief explanations of technical terms.
- Occasionally ask if the interpreter understands the information or if you should slow down or speed up your speech. If the interpreter is confused, the client may also be confused.
- Occasionally ask if the LEP client understands the information. You may have to repeat or clarify some information by saying it in a different way.
- Be patient and thank the interpreter.

### Notice to LEP Persons and Monitoring

In order to ensure that LEP persons know that the language services described in this plan are available, the Genesis Fund will post notices on its website and in its office in the two most common languages (Spanish and French) that free language assistance is available.

- “If you speak a language other than English, language assistance services, free of charge, are available to you. Please email [info@genesisfund.org](mailto:info@genesisfund.org) or call (207) 844-2035 to request interpretation.”
- “Si habla un idioma que no sea inglés, los servicios de asistencia con el idioma, sin cargo, están disponibles para usted. Envíe un correo electrónico a [info@genesisfund.org](mailto:info@genesisfund.org) o llame al (207) 844-2035 para solicitar interpretación”.
- « Si vous parlez une langue autre que l'anglais, des services d'assistance linguistique, gratuits, sont à votre disposition. Veuillez envoyer un e-mail à [info@genesisfund.org](mailto:info@genesisfund.org) ou appeler le (207) 844-2035 pour demander une interprétation.

The Genesis Fund will continue to explore and implement other outreach efforts and will keep staff informed.

The Genesis Fund will continue to monitor its LEP services in light of state and federal requirements, changes to the Genesis Fund’s documents and procedures, changes to the composition of the LEP population in the Genesis Fund’s service area, and the effectiveness of its language translation services. This Plan will be updated periodically based on those findings.

## APPENDIX A

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### INDIVIDUALIZED ASSESSMENT

#### Introduction

The Genesis Fund has conducted an individualized assessment to assess the needs of individuals with limited English proficiency (“LEP”) served. In doing so, it has balanced the following four factors: (1) The number or proportion of people with limited English proficiency (here, “LEP persons”) eligible to be served or likely to be encountered; (2) the frequency with which LEP persons come in contact with the Genesis Fund; (3) the nature and importance of the Genesis Fund’s program, activity, or service; and (4) the Genesis Fund’s available resources.

#### Number and Proportion of LEP Persons Eligible to be Served or Likely to be Encountered

The Genesis Fund first considered the number or proportion of LEP persons from a particular language group served or encountered in the Genesis Fund’s eligible service population. The greater the number or proportion of these LEP persons, the more likely language services are needed. Per its bylaws, the Genesis Fund works in Maine, New Hampshire, and Vermont, so the eligible service population is the entire populations of the States of Maine, New Hampshire, and Vermont.

To determine the number of LEP persons within the service area, the Genesis Fund first examined its own LEP encounters. These have been few in number. The two staff members who answer most incoming calls and usually greet members of the public who visit Genesis Fund office, as well as the Loan Officers and Program Officers, report no contacts with LEP persons in the past 5 years.

The Genesis Fund has reviewed U.S. Census Bureau data from the American Community Survey provided at [www.lep.gov](http://www.lep.gov).<sup>3</sup> The Civil Rights Division’s Language Map App on that site is an interactive mapping tool that helps users find out the concentration of and languages spoken by LEP individuals in a community.

That data shows there are 21,071 LEP persons in Maine (1.67% of the state population), 31,578 in New Hampshire (2.52%), and 8,754 in Vermont (1.47%). The survey identifies 38 languages that are spoken by LEP persons in the 3 states, but no state has more than 10,000 LEP persons of one specific language. Overall 24% of the LEP persons in the 3 states speak French and 22% speak Spanish. Remaining languages make up less than 10% of the total LEP population.

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<sup>3</sup> Provided at [https://www.lep.gov/maps/lma2015/Final\\_508](https://www.lep.gov/maps/lma2015/Final_508) downloaded on June 3, 2022.

## Genesis Fund Language Access Plan

Location	Maine	New Hampshire	Vermont	Service Area Total	
<b>Total Population</b>	<b>1,261,144</b>	<b>1,251,055</b>	<b>594,667</b>	<b>3,106,866</b>	
<b>Total LEP</b>	<b>21,071</b>	<b>31,578</b>	<b>8,754</b>	<b>61,403</b>	
<b>Total LEP Percent</b>	<b>1.67%</b>	<b>2.52%</b>	<b>1.47%</b>	<b>1.98%</b>	
Location	Maine	New Hampshire	Vermont	Service Area Total	% of LEP
French (incl. Patois, Cajun)	8,522	4,646	1,806	14,974	24%
Spanish or Spanish Creole	2,543	9,682	1,473	13,698	22%
Chinese	1,521	2,701	791	5,013	8%
African langs.	2,078	1,094	380	3,552	6%
Vietnamese	977	1,348	752	3077	5%
Other Indic langs.	18	1,837	641	2496	4%
Portuguese/Portuguese Creole	107	1,366	118	1591	3%
Arabic	520	715	168	1403	2%
Serbo-Croatian	123	688	572	1383	2%
Russian	568	575	168	1311	2%
Other Asian langs.	310	465	301	1076	2%
Korean	364	575	114	1053	2%
German	385	344	307	1036	2%
Tagalog	589	279	131	999	2%
Other Pacific Island langs.	49	719	10	778	1%
Mon-Khmer(Cambodian)	588	179	0	767	1%
Polish	182	479	103	764	1%
Greek	81	666	6	753	1%
Other Indo-European langs.	152	389	172	713	1%
Gujarati	-	544	41	585	1%
Thai	318	92	123	533	1%
Japanese	149	258	121	528	1%
Italian	123	217	124	464	1%
Urdu	71	277	44	392	1%
French Creole	-	376	0	376	1%
Other Slavic langs.	116	206	29	351	1%
Persian	234	86	9	329	1%
Laotian	39	193	96	328	1%
Hindi	12	278	4	294	0%
Other West Germanic langs.	129	89	48	266	0%
Other Native North American	98	65	35	198	0%
Other and unspecified	30	76	11	117	0%
Scandinavian langs.	39	7	21	67	0%
Armenian	15	47	0	62	0%
Hebrew	9	3	29	41	0%
Hungarian	4	13	4	21	0%
Yiddish	8	-	2	10	0%
Hmong	-	4	0	4	0%
Navajo	-	-	0	0	0%
<b>Total LEP</b>	<b>21,071</b>	<b>31,578</b>	<b>8,754</b>	<b>61,403</b>	<b>100%</b>

**Frequency with which LEP persons come in contact with the Genesis Fund**

As is discussed above, people with LEP come into contact with the Genesis Fund infrequently. The majority of contacts are with members of the public who contact the Genesis Fund by telephone for general information. Members of the public who are LEP rarely come to the Genesis Fund in person. Others the Genesis Fund may encounter include people who come to public forums, events, and meetings where Genesis Fund staff are present.

**Nature and importance of the Genesis Fund's program, activity, or service**

The mission of the Genesis Fund is to create housing and other economic and social opportunities for underserved people and communities throughout our service area. The organization's expressed goal is to serve those who are being left out of the mainstream economy. Therefore, it is very important that people who contact the Genesis Fund are able to access our information and resources without barriers. If LEP people are unable to access Genesis Fund financing, technical assistance, or other services because of our inability to communicate, it will interfere with our ability to equitably serve all.

**The Genesis Fund's available resources**

The Genesis Fund has limited available resources to pay for language assistance services.

In addition, because there are a wide variety of languages spoken by LEP persons in our service area, it is not possible to develop specific, specialized materials or resources that would meet the needs of every LEP person. Therefore, the Genesis Fund has made arrangements with an interpretive service that is intended to be able to meet almost any individual need for language services on demand.

**APPENDIX B**

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**INTERPRETER/TRANSLATOR/ACCOMODATION REQUEST DOCUMENTATION FORM**

**1. CONTACT/CLIENT NAME:**

**2. TOPIC/PURPOSE:**

**3. TYPE OF ASSISTANCE NEEDED:**

**4. STAFF CONTACT:**

**5. REQUEST DATE:**

**6. ARRANGEMENTS MADE:**

**7. CLIENT REFUSED OFFER OF PROFESSIONAL INTERPRETER AND REQUESTED USE OF:**

**FAMILY**

**FRIEND**

**OTHER**