

Southwest Minnesota Community Capital

Limited English Proficiency Assessment and Language Assistance Plan

LIMITED ENGLISH PROFICIENCY ASSESSMENT

Four-factor LEP Analysis:

In accordance with federal guidelines, the Southwest Minnesota Community Capital (SMCC) conducted a four-factor Limited English Proficiency (LEP) analysis to assess the need for a Language Access Plan (LAP) is required and what elements should be included.

Factor #1: The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by SMCC if the persons received adequate education and outreach and SMCC provides sufficient language services).

SMCC's service area includes eighteen counties and two Native Nations located in southwest Minnesota: Big Stone, Chippewa, Cottonwood, Jackson, Kandiyohi, Lac qui Parle, Lincoln, Lyon, McLeod, Meeker, Murray, Nobles, Pipestone, Redwood, Renville, Rock, Swift, Yellow Medicine, as well as Cañsayapi Oyate (Lower Sioux Indian Community) and Pežihutazizi Oyate (Upper Sioux Community). LEP populations include:

- 2.65% of the population of this region age five and older speak a language other than English at home, including 1.19% (representing 3,335 persons) who speak English less than "very well" (LEP), according to 2022 American Community Survey 1-year Estimates Data Profiles (DP02, Selected Social Characteristics).
- LEP households comprising the 1.19% who speak English less than "very well" include:
 - Spanish, 1.06% (2,972 persons)
 - Other Indo-European Languages, 0.10% (277 persons)
 - Asian and Pacific Islander languages, 0.64% (1,788 persons); and
 - Other Languages, 0.49% (1,362 persons).

While less than 3% LEP persons reside in SMCC's service area, SMCC is committed to providing appropriate language assistance by:

- Offering translation of vital SMCC business documents, if requested to do so by LEP persons; and
- Providing translation services at SMCC meetings where official SMCC business is being conducted, if requested to do so by LEP persons.

Factor #2: The frequency with which LEP persons come into contact with the program.

LEP persons which come into contact with SMCC's programs in proportion to their presence in the state's overall population is infrequent. Based on input from staff at SMCC's parent organization,

Southwest Initiative Foundation, there have been no reported instances in recent years of LEP persons seeking services at the Hutchinson office.

Factor #3: The nature and importance of the program, activity, or service provided by the program.

SMCC provides a range of lending and development services (training and technical assistance) programs to disadvantaged persons and communities across the southwest corner of Minnesota, focusing on small business owners and entrepreneurs.

Factor #4: The resources available and costs to the recipient.

SMCC can utilize the following options to ensure LEP persons have access to translated vital documents: private sector translation services, Google Translate, and ChatGPT. Additionally, SMCC's parent organization, Southwest Initiative Foundation (SWIF), has a language translation conversion available on the website <https://swifoundation.org/>. Language assistance services are available at no cost to LEP persons.

Based on the four-factor analysis above, SMCC has produced the following Language Assistance Plan.

LANGUAGE ASSISTANCE PLAN

This Language Assistance Plan (LAP) outlines Southwest Minnesota Community Capital's (SMCC) commitment to providing meaningful access to services for individuals with Limited English Proficiency (LEP), in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. The plan is designed to ensure that LEP individuals can effectively engage with our programs and services.

SMCC's service area includes eighteen counties and two Native Nations located in southwest Minnesota: Big Stone, Chippewa, Cottonwood, Jackson, Kandiyohi, Lac qui Parle, Lincoln, Lyon, McLeod, Meeker, Murray, Nobles, Pipestone, Redwood, Renville, Rock, Swift, Yellow Medicine, as well as Canšayapi Oyate (Lower Sioux Indian Community) and Pežihutazizi Oyate (Upper Sioux Community). With regard to assisting program participants who may have Limited English Proficiency, SMCC has completed a LEP assessment utilizing Census Bureau and American Community Survey data to identify LEP populations. LEP populations include:

- 2.65% of the population of this region age five and older speak a language other than English at home, including 1.19% (representing 3,335 persons) who speak English less than "very well" (LEP), according to 2022 American Community Survey 1-year Estimates Data Profiles (DP02, Selected Social Characteristics).
- LEP households comprising the 1% who speak English less than "very well" include:
 - Spanish, 1.06% (2,972 persons)
 - Other Indo-European Languages, 0.10% (277 persons)
 - Asian and Pacific Islander languages, 0.64% (1,788 persons); and
 - Other Languages, 0.49% (1,362 persons).

Language Assistance Measures

Based on the four-factor analysis, SMCC has identified the following language assistance measures:

- SMCC's parent organization, Southwest Initiative Foundation, staff have access and will utilize the USDA "I Speak" card to identify the primary language of the LEP person. The card is available at: <https://www.fns.usda.gov/civil-rights/ispeak>
- SMCC will utilize a translation service provider to convert content, whether spoken or written, from one language to another, ensuring that the meaning and tone, and context are accurately delivered. These services will be utilized to overcome language barriers and facilitate effective communication as needed.
- SMCC will train staff on the importance of language access and procedures to provide language assistance annually.

Notice to LEP Persons

SMCC will inform LEP individuals to their right to no cost language assistance services through:

- Posting required notice(s) describing the Federal laws prohibiting job discrimination based on race, color, sex (including pregnancy and related conditions, sexual orientation, or gender identity), national origin, religion, age (40 and older), equal pay, disability or genetic information (including family medical history or genetic tests or services), and retaliation for filing a charge, reasonably opposing discrimination, or participating in a discrimination lawsuit, investigation, or proceeding. This notice is posted at the front entry of our building.
- SMCC has Equal Opportunity non-discrimination posters in the applicable languages. Due to the low numbers of LEP individuals in our region, and the cost of printing posters in various languages, printing posters and brochures in a language as needed will be produced (per encounter with an LEP person or as LEP population increases).

The Equal Opportunity non-discrimination poster is available at: <https://www.eeoc.gov/poster>

Monitoring and Updating the Plan

SMCC will regularly review and update this LAP to ensure its effectiveness:

- SMCC will conduct an annual assessment of the LEP populations we serve and the effectiveness of our language assistance measures.
- SMCC will solicit feedback from LEP individuals and staff to identify areas for improvement.
- SMCC will update the plan as necessary to address changes in LEP populations, services, or resources.

Designation of a Language Access Coordinator

SMCC has designated Briana Mumme, Southwest Initiative Foundation Economic Development Manager, as the Language Access Coordinator responsible for overseeing the implementation and

maintenance of this LAP. The coordinator will serve as the primary point of contact for language assistance issues and ensure compliance with this plan.

Southwest Minnesota Community Capital is committed to providing meaningful access to services for LEP individuals. This Language Assistance Plan serves as a framework to ensure that all individuals, regardless of their English proficiency, can access and benefit from our programs and services.

	Big Stone County, MN	Chippewa County, MN	Cottonwood County, MN	Jackson County, MN	Kandiyohi County, MN	Lac qui Parle County, MN	Lincoln County, MN	Lyon County, MN	McLeod County, MN	Meeker County, MN	Murray County, MN	Nobles County, MN	Pipestone County, MN	Redwood County, MN	Renville County, MN	Rock County, MN	Swift County, MN	Yellow Medicine County, MN
English only	4,672	10,687	9,765	8,974	35,114	6,204	5,173	20,976	32,910	21,342	7,185	13,808	8,203	13,726	12,963	8,822	8,704	8,641
Language other than English	192	984	973	418	5,679	193	120	2,593	1,828	658	559	6,596	507	708	909	297	535	358
Speak English less than "very well"	73	585	318	163	2,384	57	33	1,271	718	181	239	3,533	143	213	196	48	206	162
Spanish	58	614	588	244	3,611	114	72	1,191	1,579	512	323	4,866	385	275	772	179	340	298
Speak English less than "very well"	44	362	180	91	1,404	37	19	683	673	123	137	2,720	96	67	128	37	158	137
Other Indo-European	96	59	67	77	302	47	17	250	165	79	96	73	45	95	74	72	122	20
Speak English less than "very well"	16	25	0	4	62	7	0	12	13	27	9	21	7	19	32	7	15	1
Asian and Pacific Islander languages	23	282	305	69	312	28	27	793	54	48	127	963	67	258	49	32	66	7
Speak English less than "very well"	0	186	129	40	96	13	10	463	28	31	90	466	40	124	32	4	33	3
Other languages	15	29	13	28	1,454	4	4	359	30	19	13	694	10	80	14	14	7	33
Speak English less than "very well"	13	12	9	28	822	0	4	113	4	0	3	326	0	3	4	0	0	21

HUD Safe Harbor Provisions

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.