



CHI ISHOBAK

Language Access Plan (LAP)

I. Introduction

In compliance with Title VI of the Civil Rights Act, Chi Ishobak, Inc. has established the following Language Assistance Plan (LAP) to ensure that individuals with limited English proficiency (LEP) may access all the resources and services provided by our organization. An “LEP individual” or “person with LEP” is defined as an individual who does not speak English as their primary language and who has limited ability to read, speak, write, or understand English.

II. Chi Ishobak Policies

A. Language Access Policy Statement

It is the policy of Chi Ishobak, Inc. to provide timely meaningful access for persons with LEP to all programs and services offered. All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the organization will provide these services to them.

B. Purpose & Authority

The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for agency personnel to follow when providing services to, or interacting with, individuals with LEP, in order to ensure equity and inclusion across beneficiaries.

Following these guidelines is essential to the success of Chi Ishobak’s mission to provide Tribal Citizens with access to affordable capital for the purpose of business loans and individual financial development through collaborative and education-oriented lending services, and to practice responsible lending in order to protect loan capital for future generations of Tribal Citizens.

C. Language Access Coordinator

The Program Manager will serve as the Language Access Coordinator (“the Coordinator”) and will lead the organization’s efforts to implement this policy. The

Coordinator is responsible for drafting, maintaining, and overseeing implementation of the Language Access Plan, and serves as a resource to other staff or partners to help resolve issues that arise related to language access. The Coordinator is designated by the Executive Director and works under their direction and supervision.

The Language Access Coordinator's responsibilities include:

- Provide training to other staff members or volunteers on Chi Ishobak's Language Access Plan and policies.
- Track and resolve issues related to language services.
- Respond to language services complaints.
- Conduct regular data review.
- Conduct outreach to partners, vendors, or clients as needed in relation to language services.
- Collect feedback from clients and community partners.

III. Language Access Needs Assessment

A. Demographic Data

Chi Ishobak is committed to advancing economic prosperity in Native communities through our financial products and development services. While we primarily serve citizens of the Pokagon Band of Potawatomi Indians in Michigan and Indiana, our services extend to smaller Tribes in our region, including the Little River Band of Ottawa Indians, the Match-E-Be-Nash-She-Wish Band of Potawatomi Indians, and the Nottawaseppi Huron Band of Potawatomi Indians. Chi Ishobak's products and services are also available to non-Tribal citizens, although most of our lending, both by dollar amount and number of loans, has historically been to borrowers who are either Tribal citizens or Native-owned businesses.

In Fiscal Year 2022, Chi Ishobak served 172 clients with Financial Products and 89 with Development Services, all of whom were Native American. Of the 1,133 total beneficiaries of Chi Ishobak's products and services (including clients' family members or employees), 71% were Native American, 12.5% were Black/African American, 4.5% were Hispanic/Latino, and 12% were white. 100% of our commercial borrowers were minority-owned enterprises.

LEP - MI & IN residents identified as Potawatomi

Of U.S. Census Bureau ACS respondents aged five years and over identified as Potawatomi (alone or in combination with other tribal groupings), 0.41% of those in Michigan and 1.64% of those in Indiana speak English less than “very well” (compared to 0.21% in the United States as a whole).

LEP - MI & IN residents identified as “American Indian or Alaska Native”

Of ACS respondents aged five years and over who were identified as “American Indian and Alaska Native,” 12.97% of those in Michigan and 23.93% of those in Indiana speak English less than “very well” (compared to 15.7% in the United States as a whole).

LEP - all residents in MI & IN

Of all ACS respondents (across all races/ethnicities) aged five years and over, 966,415 (10.2%) of those in Michigan and 644,718 (10.0%) of those in Indiana speak a language other than English at home (compared to 22.0% in the United States). Of these, 36.1% in Indiana and 35.9% in Michigan speak English less than “very well.” To put this in other terms, roughly 3.61% of all Indiana residents and 3.65% of all Michigan residents have limited English proficiency.

Based on current demographic data and a review of Chi Ishobak’s historic client demographics, we anticipate a low probability of contact with LEP persons. Nevertheless, we are still responsible for providing meaningful access to all products and services offered.

Chi Ishobak continues to stay current on shifting population demographics and needs through a periodic review of statewide and population-specific demographic data, and annual review of translation requests and demographic summary data collected from clients and beneficiaries.

B. Potawatomi Language Revitalization & Culturally Relevant Services

Founded as the CDFI for the Pokagon Band of Potawatomi Indians in Michigan and Indiana, Chi Ishobak is rooted in the cultural practices, heritage, and traditions of the Tribe and its citizens, and we strive to provide loan products and development services that not only reflect but also support connection to Potawatomi cultures and identities.

Pokagon Band citizens take great pride in the enormous strides the Band has taken to further economic development, develop tribal infrastructure, and resources, and improve healthcare, housing, education, and elder services to its citizens. In addition, the Pokagon Band has made it a priority to develop language and cultural programs for its citizens, through its Department of Language and Culture, to fully engage the Pokagon Band community in the cultural heritage and the traditional lifeways of the Pokagon people. They recognize their clan identity and remember their ancestors' presence in modern-day gatherings.

Neshnabémwen, the language of the original people, is the native language of the Potawatomi people. Today, the Potawatomi language is considered critically endangered, with fewer than 10 fluent speakers still alive, most of whom are spread out across the Midwest. Continent-wide, Native American languages are on the decline. Of the more than 150 North American indigenous languages, 135 are on the brink of extinction and spoken by Elders only, according to the Bilingual Research Journal. A special Census report found that from 2006 to 2010, more than half of Native American languages were spoken by fewer than 1,000 people.

It is a goal of the Pokagon Band to revitalize its language, and the Tribe's Department of Éthë Bodwéwadmimwat offers opportunities for learning the Potawatomi language through in-person and virtual language classes, a smart-phone app, and special events. The Pokagon Band has made investments into language revitalization efforts, with a four-person team employed by the Tribe dedicated to this work.

Chi Ishobak's Language Access Plan reflects our commitment to offer culturally relevant, accessible, and inclusive financial products and services, while supporting connection to culture and heritage by:

- **Increasing accessibility and inclusivity of our products and services** through language access; and
- **Increasing access to and engagement with our language and culture** through our products and services, whenever possible.

These objectives are furthered through a range of actions, such as:

- Referencing connections to traditional lifeways in our materials and website.
- Including phrases and references to Potawatomi language and cultural practices in all of our print and digital materials.

- Providing culturally relevant financial wellness education (workshops, materials, etc.) that connects to heritage, traditions, and values.
- Supporting clients who seek to use our services or products to establish, stabilize, or grow culturally relevant businesses, activities, or practices.
- Continue to seek input from clients, partners, staff members, and other stakeholders about ways to leverage Chi Ishobak's products, services, and unique role in our community and industry to contribute to our collective vision to rebuild the Pokagon Band of Potawatomi as well as Indian Country into supportive and nurturing communities, strong in language and culture, and with all tribal citizens provided with the tools and opportunities needed for meaningful lives and self-sufficiency.

C. Identification of LEP Communities & Individuals

Chi Ishobak identifies LEP individuals through intake forms and other public-facing interactions, including those that occur in person, in writing, or by telephone.

In Person: Chi Ishobak has available "I Speak" cards and visuals easily accessed in our reception area, which is a tool for an LEP person to communicate the language the person speaks. Chi Ishobak staff will direct people to point out the language they speak as listed on the "I Speak" cards when it is apparent they are having difficulty speaking or understanding English. The staff members will then utilize the language services described in this Plan.

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 trouble communicating in English, the staff member will use a telephone interpreting service as 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 in their files identifying the person as LEP, indicating the language spoken, and listing the language assistance tools requested and utilized.

IV. Language Assistance & Services

A. Operational Procedures

Point of Contact	Expectations of staff	Tools & Resources
One-on-one Client Meetings (Intake, Loan Servicing, Development Services)	<p>Ensure that an interpreter is available and scheduled for the time of appointments, with adequate technical or subject matter knowledge relevant to the client's needs or industry.</p> <p>Require interpreters to sign confidentiality agreements for the sessions and require clients to sign waivers or consent forms allowing a third party to participate.</p>	<p>In-Person Interpreting Agency</p> <p>Telephone Interpreting Agency</p> <p>Client Informed Consent Form/Waiver</p> <p>Confidentiality Agreement</p>
Workshops & Trainings	<p>Include opportunities for participants to indicate their need for language access services in advance of workshops or training through registration/sign-up forms, and links in digital promotions.</p> <p>Arrange for an interpreter to be present at public workshops/training courses as needed.</p> <p>Coordinate with development services partners to provide information about LEP Plan and coordinate resources.</p>	<p>"I Speak..." cards</p> <p>Language line</p> <p>In-Person Interpreting Agency</p>
Community Events	<p>Identify language spoken.</p> <p>Connect with language lines to assess needs.</p>	<p>"I Speak..." cards</p> <p>Language line</p>
Providing Referrals	<p>Call the referral source and identify a point of contact with adequate language capacity. Connect the client with the point of contact.</p> <p>Request and review the LEP Plan for</p>	<p>"I Speak..." cards</p> <p>Language line</p> <p>Brochures/flyers</p>

	the referral source as appropriate (courts, nonprofit partners, financial service providers, etc.)	
Written & Digital Materials	Vital documents are currently available in English and Spanish vital documents are to be reviewed with the support of an interpreter during intake.	Additional translations can be arranged through a selected translation agency.

B. Staff Compliance

Chi Ishobak, Inc. staff will initiate an offer for language assistance to clients who have difficulty communicating in English.

All personnel will inform members of the public that language assistance services are available free of charge to persons with LEP and that the agency will provide these services or coordinate with a language access agency (interpreter or translator) to provide timely access.

C. Identifying Primary Language

All Chi Ishobak, Inc. intake staff will have "I Speak..." cards in the languages most prevalent in our community (as outlined in Section III.A. of this document). Before contacting a qualified interpreter or a bilingual staff member, intake staff should show the "I Speak..." card to the person with LEP so that they can identify their primary language.

Chi Ishobak staff will assess which medium of interpretation (telephone or in person) is appropriate based on the presenting situation, available resources, and preference of the individual.

D. Children as Interpreters Policy

Chi Ishobak, Inc. will not use minor children to interpret, to ensure confidentiality of information and accurate communication. In instances where an adult child accompanies a client to provide interpretation assistance, Chi Ishobak will require a signed waiver indicating informed consent for Chi Ishobak, Inc. to share relevant information with the adult child for purposes of language access. If at any time

organization staff or the client feel an external interpreter is required, Chi Ishobak will provide timely access to this service.

E. Engagement with Pokagon Band

Whenever feasible, Chi Ishobak staff will coordinate with Pokagon Band staff to incorporate elements related to cultural practices, heritage, and Potawatomi language in Chi Ishobak programming and materials. This may include a range of activities, such as:

- Inviting Language Specialists from the Tribe's Department of Éthë Bodwéwadmimwat or other staff from the Center of History & Culture to participate in events/programs or provide materials and information to share information with clients and other attendees.
- Coordinating with Department of Housing & Community Development, Social Services, and related economic development agencies (such as Mno-Bmadsen) to align our products and services with emerging needs and opportunities that they may notice among the clients and constituents they interact with.
- Other coordination as needed.

V. Providing Notice of Language Assistance Services

A. Standard Communications

Print materials notifying clients of any language services available to them will be developed and displayed in areas where intakes are conducted. These posters will contain a simple message encouraging clients to request assistance with language access and will be in English as well as the principal languages spoken in the service area. Staff will also have access to the Language Access Plan and will have "I Speak" cards available.

In all intake areas on our website, Chi Ishobak will post and maintain clear and readable notifications in the languages most prevalent in our community notifying clients that translation and interpretation services are available upon request.

B. Community Outreach & Collaboration

Chi Ishobak will identify the primary sources through which clients with LEP are referred to our services, and culturally based organizations that serve individuals with LEP in our community. Chi Ishobak will work to develop collaborative relationships with these organizations to ensure seamless access to services.

Chi Ishobak will share our LAP and the documents and knowledge we develop regarding LEP resources with other nonprofit service providers or partners in our area as requested.

VI. Training Staff on LEP Policies & Services

A. Demographic Data

Chi Ishobak will distribute the LAP to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures.

- All staff providing technical assistance, training, development services, or receiving in-bound calls will receive LEP training upon employment, and then annually.
- LEP information will be incorporated into the employee handbook.
- LEP training will include information on the following topics:
 - Availability and process for accessing language services approved by Chi Ishobak for use with clients.
 - Access to education, events, and other resources related to Potawatomi language learning, revitalization, and preservation available for staff as well as clients.
 - LEP plan and procedures.
 - Responding to LEP individuals.
 - Obtaining interpreters (in-person and over the phone);
 - Using and working with interpreters.
 - Procedures for translating documents.
 - Documenting language requests.
- Chi Ishobak will circulate this policy to all staff within 10 days after its adoption. Every five years, Chi Ishobak will circulate a revised policy to all staff after its adoption.

VII. Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the Language Access Coordinator will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, they may make use of all or a portion of the following mechanisms:

- Survey staff on how often language access services are used and how they could be improved.
- Conduct customer satisfaction surveys of LEP individuals.
- Observe and evaluate staff interactions with LEP individuals.
- Solicit feedback from community-based organizations and other partners.
- Keep current on community demographics by engaging with local resources.
- Consider new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.
- Monitor the agency's response rate to suggestions or requests by LEP individuals.
- Maintain a record of available services for LEP individuals and the frequency of their use.
- Maintain a record of funds and staff time spent on language assistance services.

ADOPTED:

5/20/2024

Date Adopted

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