



Language Access Plan

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with limited English proficiency (“LEP persons”). The North Carolina Housing Finance Agency (“NCHFA” or “NC Housing Finance Agency”) is a recipient of federal funds for a portion of its programs and thus obligated to reduce language barriers that can preclude meaningful access by LEP persons to NC Housing Finance Agency’s programs.

For the purposes of this plan:

- a) *LEP* means Limited English Proficiency.
- b) *LAP* means Language Access Plan.
- c) *Limited English Proficiency person means* a person who does not speak English as their primary language and who has a limited ability to speak, read, write or understand English.
- d) *Sub-grantee* means an entity designated as a recipient for funding assistance whether directly or indirectly from the NC Housing Finance Agency which provides housing, benefits, counseling, or other assistance to individuals or other entities. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, private agency or institution, builder, property manager, residential management corporation, or cooperative association which receives funding assistance from the NC Housing Finance Agency.

Analysis

The NC Housing Finance Agency conducted a four-factor analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by NC Housing Finance Agency or its federally funded programs, (2) frequency with which LEP persons come into contact with NC Housing Finance Agency programs, (3) nature and importance of the program, activity or service to people’s lives and (4) resources available and costs:

- (1) Per the 2021 American Community Survey Five-Year Estimate, 7.7% of North Carolina’s population speaks Spanish at home, and 3.1% of North Carolina’s population is Spanish-speaking with limited English proficiency at home. No other language group has a sizeable LEP population. About 87.9% of North Carolina’s population speaks only English at home.
- (2) NC Housing Finance Agency primarily provides funds to organizations and rarely interacts directly with individual households. Even in situations where the funds directly benefit an individual household, NCHFA’s contact is almost entirely with the organization or lender assisting the household, not with the household itself. NC Housing Finance Agency provides housing assistance through local government, nonprofit and for-profit partners. As a result,

North Carolinian individuals, including LEP persons, infrequently come in contact with federally-funded programs directly through NC Housing Finance Agency.

- (3) NC Housing Finance Agency helps provide an important and acute need in people's lives, housing. Generally, NC Housing Finance Agency's single-family housing programs serve individuals through government, nonprofit and for-profit partners and its multifamily housing programs work with developers and property managers; NC Housing Finance Agency has limited programmatic interaction with individuals.
- (4) In response to the significant Spanish-speaking population in North Carolina, NC Housing Finance Agency has a Spanish version of its website and has vital documents, program brochures and materials available in Spanish. In addition, NC Housing Finance Agency staff members who are bilingual in English and Spanish are available to translate. Upon request, NC Housing Finance Agency will provide oral interpretation and/or written translation in other languages. NC Housing Finance Agency will have available language identification (or "I speak") cards or posters. If other significant populations of LEP persons are identified, NC Housing Finance Agency will consider additional targeted measures to serve those populations.

Because virtually all assistance is provided by NC Housing Finance Agency's partners, all sub-grantees are and will be required to comply with Title VI and its accompanying regulations. All organizations receiving federal funds will conduct and provide a four-factor analysis to NC Housing Finance Agency and organizations serving counties with an LEP group that is at least 5% or at least 1,000 people will be required to complete an LAP. NC Housing Finance Agency will assist agencies in finding appropriate translation resources and will disseminate translated U.S. Department of Housing and Urban Development ("HUD") notices, brochures and other documents. Additionally, individual NC Housing Finance Agency programs may provide more language access assistance beyond the strategies described within this plan.

Evaluation

NC Housing Finance Agency will update its four-factor analysis and LAP as warranted to ensure it continues to provide meaningful access to LEP persons as and will revise its policies and procedures as necessary. Additionally, if the NC Housing Finance Agency learns that the number of LEP persons speaking any given language exceeds 2% of the North Carolina population¹, NC Housing Agency will review and, as warranted, update its language access strategies and language access plan. NC Housing Finance Agency staff will also be trained on LEP policies and procedures.

NC Housing Finance Agency's LAP is available to the public. The information will be made available in a form accessible to persons with disabilities upon request to NCHFA, 3508 Bush Street, Raleigh NC 27609, Tel. (919) 877-5700.

Citizens, public agencies and other interested parties will have reasonable and timely access to information and records relating to the LAP. All records that are public under G.S. 132 will be made accessible to interested individuals and groups during normal working hours.

¹ Based on analysis of the most recent US Census Bureau ACS 5-Year Estimates Detailed Table C16001.

At any time, citizens may submit complaints related to the LAP by contacting NC Housing Finance Agency's LAP/LEP contact people: Brian O'Donnell and Bettie Teasley at ResearchHelp@nchfa.com. NC Housing Finance Agency will provide a written response to every written complaint that relates to the LAP within 30 business days.