



# LANGUAGE ASSISTANCE POLICY

May 15, 2024

## Policy Statement

It is the policy of Rochdale Capital Corporation, Inc. (“Rochdale Capital”) to not discriminate against any person who may have limited English proficiency (“LEP”). As a community development loan fund, Rochdale Capital will provide timely and meaningful access to all financial products and services to LEP clients. Staff shall provide free language assistance services to LEP individuals whom they encounter based on the provisions set forth in the Language Assistance Plan for Limited English Proficiency (the “LAP”).

## Purpose and Authority

The purpose of this Language Assistance Policy (this “Policy”) is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for Rochdale Capital staff to follow when providing services to, or interacting with, LEP individuals. Following the guidelines as established in the LAP is essential to the success of our mission, which is to:

- promote the expansion of community ownership and cooperative principles.
- advance equity, diversity, inclusion (EDI), as well as asset building in under-resourced communities; and
- broaden equitable access to capital by offering flexible, affordable financing not currently available through strategic partner NCB.

## Language Assistance Measures

Based on the guidelines established in the LAP, our staff shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP individual requests language assistance services, provided the availability as established in the LAP. This LAP shall be posted on Rochdale Capital's website to provide notice of available language assistance services.

## Policy Review

This Policy and the language needs of Rochdale Capital and its service population will be reviewed by management at least annually and approved by the Board of Directors each year.



# **LANGUAGE ASSISTANCE PLAN**

## **FOR LIMITED ENGLISH PROFICIENCY INDIVIDUALS**

Rochdale Capital Corporation, Inc. (“Rochdale Capital”) is 501c3 nonprofit loan fund dedicated to financing community ownership and cooperatives across a wide range of sectors, including housing, food, education, healthcare, renewable energy, business, and community and economic development. We empower cooperative enterprises, small businesses, real estate developers, and nonprofit organizations, fostering community ownership and cooperative principles through targeted loan products and support services.

We offer patient capital with favorable terms and adaptable credit requirements, ensuring access to capital that may otherwise be difficult to secure. Additionally, we offer technical assistance to support both existing and potential clients, enhancing financial literacy and business acumen to foster economic growth and community development. Like our strategic partner, NCB, our geographic approach aligns with a national lending strategy, focusing on the East Coast and major U.S. cities. We frequently collaborate with NCB and other community development financial institution (CDFI) partners to expand into new locations and meet the capital needs of high-impact projects.

### **Purpose**

The purpose of this Language Assistance Plan for Limited English Proficiency (this “Plan”) is to identify Rochdale Capital’s responsibilities for providing Limited English Proficiency (LEP) individuals with meaningful access to vital documents and information about its financial products and services (per Executive Order 13166 and Title VI of the Civil Rights Act of 1964). The following information discusses the translation services available and a brief description of our programs and customers, as well as future plans to serve LEP individuals.

### **LEP ASSESSMENT AND SERVICES**

Rochdale Capital serves a national market and its volume of service shall reflect the number of LEP individuals in its market communities.

### **Assessment of Need**

Staff at the initial point of contact will conduct an assessment for the need for language assistance, and notify the individual of the right to an interpreter at no cost. Staff members who have subsequent contact will continue to assess the need for language assistance.



### **Providing Language Assistance Services**

Effective communication with LEP individuals can come in two forms: oral and written. Rochdale Capital has reviewed both the language needs of our communities and the business need to invest in written translation of loan documents and disclosures. Rochdale Capital will decide how to allocate its resources for translation services based on relevance, time, or cost restraints. Rochdale Capital's website can be translated into another language using the free built-in Translate tool of Google Chrome.

Regarding oral interpretation, Rochdale Capital is exploring options to provide telephonic interpretation services through a third party. The timeline of implementation will be dependent upon the frequency in which staff have interactions with LEP individuals. Check-ins with staff at weekly staff meetings will be how we monitor the frequency of LEP interaction along with the type of translation or interpretation provided and available.

### **Notices of Language Assistance**

Rochdale Capital will provide free language assistance based on the allocation of resources for these services.

### **Monitoring**

Rochdale Capital keeps current on shifting population demographics and needs through an annual review of U.S. Census Bureau ACS data. Additionally, any translation request is routed through the Manager of Operations and Compliance, Chantal Hart. All policies and procedures are reviewed annually to ensure that changes are timely and accurate. This LAP is also reviewed annually for updates.

### **Training**

Employees, management, and new employees are trained annually on the Language Assistance Program and plan. This training is conducted both in person and virtually based on the resources available. Rochdale Capital's guidelines, information, and procedures for staff regarding our responsibility to LEP individuals are available in the Management Policies folder in Rochdale Capital's General – Organizational Documents OneDrive site for ready access by all personnel.