



## Language Assistance Plan and Policy

---

---

### 1. INTRODUCTION

Invest Detroit is a mission-driven lender, investor, and partner that supports business and real estate projects that will ignite economic growth in Detroit and the region. Our goal is a thriving City that works for all Detroiters with an improved quality of life—inclusive of housing, resourced and walkable neighborhoods, and equal opportunities for jobs and business growth.

Invest Detroit is aggressively pursuing a four-fold strategy for investment in target communities:

#### STRENGTHENING NEIGHBORHOODS:

Our neighborhoods approach focuses our lending tools, relationships, and expertise on targeted neighborhood locations that will catalyze and inspire further growth in surrounding areas. We work with residents to identify priorities and developers who are community-minded. Partnering with the City of Detroit, neighborhood leaders and associations, among others, we are working to bring proven tools into ten targeted neighborhoods through the Strategic Neighborhood Fund.

#### INCREASING DENSITY:

Increasing the population of Detroit by attracting and retaining residents resulting in less vacant buildings, safer neighborhoods, and a stronger local economy. We prioritize mixed-use projects that provide affordable housing so that residents at all income levels have a place to call home.

#### GROWING JOB OPPORTUNITIES:

Supporting businesses over a range of sectors helps to create a wide range of opportunities for Detroit residents at all stages of their education or career paths. This results in local businesses being able to provide jobs to residents without cars, cutting down on commute times for busy parents, promoting walkable neighborhoods, and improving the local economy. Our programs work together to support local entrepreneurs who are creating new jobs or retaining existing jobs within the city.

#### SUPPORTING INCLUSIVITY:

Equitable access is a thread that runs through all of our programs and goals. Our vision is a Detroit for everyone with multi-ethnic and mixed-income neighborhoods where all residents feel safe and welcome and have access to resources and opportunities. Through our real estate work we ensure that we maintain percentages of affordable units in multi-family housing, and we work to identify and support developers of color. In our small business and venture investment work, we actively seek out entrepreneurs that are persons of color, immigrants, female, or Detroit residents.

---

Invest Detroit is strongly committed to doing its part to ensure equitable opportunity, voice, and partnership in every facet of our work and throughout Detroit. Diversity and inclusion are core values of our organization—now and always. Invest Detroit is committed to eliminating any practices or activities that exclude or disadvantage specific classes of persons as a result of national origin or culture. This Language Assistance Plan and Policy is one of the many ways in which Invest Detroit guarantees our commitment to diversity and inclusion for our many constituents and stakeholders.

## **2. LANGUAGE ASSISTANCE POLICY STATEMENT**

Timely and accurate communication with the public is essential to Invest Detroit’s mission. Invest Detroit is committed to advancing equity for all, including historically underserved individuals with limited English proficiency (LEP), through meaningful language access to Invest Detroit benefits, information, and services in accordance with any relevant federal, State, or local requirements.

- Invest Detroit and its staff are required to plan for, and take reasonable steps to provide, timely, accurate, and meaningful access to programs or activities conducted both by Invest Detroit and by entities receiving federal financial assistance from Invest Detroit for individuals with LEP.
- This policy reflects that it is Invest Detroit’s responsibility, and not that of an individual seeking services, to take reasonable steps to ensure meaningful access to all of our programs and activities and to foster equity for individuals who interact, or may interact, with Invest Detroit over the phone, in writing, in person, or via electronic methods.
- Ensuring the quality and accuracy of language assistance services provided by Invest Detroit is critical to providing individuals with LEP meaningful access to our programs and activities. Invest Detroit staff will avoid the reliance on individuals who are not competent to provide such language assistance services.
- Where applicable, in light of our mission and operations, our staff shall take reasonable steps to effectively inform the public, in a language they understand, of the availability of language assistance programs and activities, and to provide qualified language assistance at no cost to individuals with LEP.
- Invest Detroit’s Language Assistance Plan and Policy sets forth guidance for Invest Detroit and its staff with respect to procedures and protocols to ensure that language access policies, standards, and procedures are implemented consistently across all Invest Detroit programs and activities.
- This plan is carried out by Invest Detroit’s Language Assistance Coordinator and associated staff, as well as by the management leadership, Board of Directors, and all staff at Invest Detroit.

### 3. INVEST DETROIT’S ASSESSMENT OF NEED FOR LANGUAGE ASSISTANCE

As noted above, Invest Detroit is strongly committed to doing its part to ensure equitable opportunity, voice, and partnership in every facet of our work and throughout Detroit. This means valuing and promoting diversity in our business practices and working with our partners and communities. Our vision is a Detroit for everyone with multi-ethnic and mixed-income neighborhoods where all residents feel safe and welcome and have access to resources and opportunities. We work to identify and support real estate developers of color, and we actively seek out entrepreneurs that are persons of color, immigrants, female, or otherwise potentially disenfranchised stakeholders.

The most significant racial and ethnic groups within Detroit’s population are African American (77%), non-Hispanic White (14%), and Hispanic (8%). The remaining less-than-2% of the population include persons of Asian, African, and Indian-subcontinent descent. Specific census tracts/neighborhoods of Detroit include communities of Bangladeshi Americans, Indian Americans, and Pakistani Americans; similarly, significant communities of Arab Americans call Detroit their home. Other neighborhoods are home to small communities of people of Asian descent, including Hmong, Lao, Filipino, Korean, and Chinese persons.

Invest Detroit is committed to taking appropriate steps to ensure meaningful access to our programs by LEP persons throughout the City, with a special focus on 10 census tracts that comprise the vast majority of Invest Detroit’s investments in small business and real estate development. To do so, Invest Detroit has applied the Four Factor Analysis as outlined in the relevant Federal Register notice (Vol. 70, No. 23, p. 6069).

#### **Factor 1 – The number of LEP persons (potentially) served**

Table 1 on the following page provides data on the diversity of languages spoken in the 10 census tracts in which the vast majority of Invest Detroit’s activities took place in 2023. For each such census tract, Invest Detroit has obtained data on:

- The total percentage of residents for whom English is not their primary language;
- The percentage of residents who are native Spanish-speakers, and the percentage of Spanish-speakers projected to demonstrate a Limited English Proficiency (LEP);
- The percentage of residents whose primary language is an Indo-European language, as well as the percentage of such persons projected to demonstrate LEP;
- The percentage of residents whose primary language is an Asian or Pacific Island language, as well as the percentage of such persons projected to demonstrate LEP; and
- The percentage of residents whose primary language is a different language, as well as the percentage of such persons projected to demonstrate LEP.

**Table 1: Languages spoken in key Census Tracts for Invest Detroit’s investments (based on 2023 activity)**

Primary service area by Census Tract	City neighborhood	Activity counts	Total % of population with primary language other than English	% speaking Spanish	% speaking Spanish with LEP	% speaking Indo-European languages	% speaking Indo-European languages with LEP	% speaking Asian and Pacific Island languages	% speaking A-PI languages with LEP	% speaking other languages	% speaking other languages with LEP
5018	East Warren/Cadieux	8	4.80	3.40	0.12	0.20	0.00	1.20	0.32	0.00	0.00
5112	Midtown	2	6.10	0.90	0.00	2.30	0.00	2.90	2.36	0.00	0.00
5173	Midtown	4	4.90	0.90	0.90	1.90	0.37	2.10	1.54	0.00	0.00
5189	Downtown	3	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5204	Midtown	8	6.80	3.30	0.00	1.10	0.55	0.60	0.60	1.80	0.69
5207	Southwest/Vernor	5	9.20	0.80	0.00	5.50	0.00	2.60	1.51	0.30	0.00
5211	Eastern Market	4	31.30	29.60	11.87	1.30	1.30	0.00	0.00	0.50	0.00
5234	Southwest/Vernor	3	29.00	28.30	13.98	0.40	0.40	0.30	0.00	0.00	0.00
5339	Grandmont Rosedale	6	19.00	2.20	1.16	10.30	2.87	4.00	0.04	2.60	0.00
5429	Midtown	3	8.30	5.00	2.02	1.20	0.00	2.10	2.10	0.00	0.00
<b>Total</b>	<b>(Average %)</b>	46	11.98	7.48	2.14	2.42	0.72	1.58	0.70	0.52	0.02

Census Tracts 5211 and 5234 have sizable Spanish-speaking populations—29.6% and 28.3%, respectively. Significantly, large shares of these populations are projected to also demonstrate Limited English Proficiency (LEP)—nearly 12% of the population in Tract 5211 and nearly 14% of the population in Tract 5234 (highlighted in red).

No other ethnic/linguistic group has such marked dependency on a language other than English and accompanied by Limited English Proficiency. Table 1 shows six Census Tracts in which dependency on a language other than English, accompanied by Limited English Proficiency, characterizes between 1% and 3% of the population (highlighted in red): Tracts 5211 and 5339 for native speakers of an Indo-European language; and Tracts 5112, 5173, 5207, and 5429 for native speakers of an Asian/Pacific Island language.

This data aligns with Invest Detroit’s experiential evidence to date, namely, that among populations in Census Tracts typically served by Invest Detroit, the most common languages other than English spoken by area residents are Spanish, Bengali, and Arabic. These are reflective of the City’s significant Hispanic and small, but still significant, Bangladeshi-American (or other Indian subcontinent) and Arab-American communities. This knowledge provides key understanding undergirding this Language Assistance Plan and Policy.

### **Factor 2 – The frequency with which LEP individuals come in contact with Invest Detroit**

As a financial institution, Invest Detroit’s activities are primarily lending and investment products which are available to small businesses, entrepreneurs, and real estate developers. It is quite unlikely that a contact in the real estate development community would be an LEP individual. In fact, Invest Detroit’s experience to date would suggest that, in general, persons who have historically represented entities seeking Invest Detroit’s financial products and services are only occasionally LEP persons.

Still, our commitment to equitable opportunity, voice, and partnership in every facet of our work undergirds a commitment to language assistance for any LEP persons representing entities that may be candidates for our products and services in the changing Detroit landscape. Moreover, Invest Detroit occasionally engages with the broader community to garner input about real estate developments or other funded projects located within Detroit’s neighborhoods, and we want to ensure that all members of the community have full access to receiving and responding to such communications.

The Factor 1 analysis above compels Invest Detroit to redouble efforts to ensure that our outreach communications and invitations to receive input from the community at large specifically include translation and interpretation services in Spanish, Bengali, and Arabic, while also ensuring that the full range of necessary services exists within our language assistance portfolio to meet the needs of LEP persons whose primary languages are other than these three.

### **Factor 3 – The nature and importance of Invest Detroit’s programs**

The financial tools provided by Invest Detroit are potentially very important to the success of small businesses and developers in the City. As noted above, Invest Detroit anticipates that the real estate development community would have few LEP persons representing those entities, however, Invest Detroit recognizes that small businesses, especially businesses within a Detroit demographic largely serving specific ethnic communities, might, in fact, be owned and managed by persons of such ethnicity who may themselves be LEP individuals.

While accessing Invest Detroit’s loan products and investment opportunities may not be critical to every such enterprise, Invest Detroit is firmly committed to providing access to those products and services across the board; therefore, we recognize the important of language assistance as a critical element in eliminating impediments to those opportunities for the entire business community.

### **Factor 4 – Language assistance resources available to Invest Detroit**

As noted above (and as will be discussed further in Section 4 below), analysis undertaken for this Language Assistance Plan and Policy points to the specific need for Invest Detroit to commit resources for translation and interpretation for persons whose primary language is Spanish, Bengali, or Arabic. Invest Detroit’s current staff includes some Spanish-speaking staff, who are available to act as interpreters for Spanish-speaking LEP individuals—the category of LEP persons demonstrated in our Factor 1 analysis to be the

most likely to interact with Invest Detroit. The potential for these staff to act as interpreters for Spanish-speaking clients and their availability to be summoned as needed for this skill is broadly known among Invest Detroit staff.

With the adoption of this Language Assistance Plan and Policy, Invest Detroit commits to budget resources to provide translation of key documents into Spanish, Bengali, and Arabic. In addition, on an ongoing basis, Invest Detroit has committed to budget resources for translation and interpretation services on an as-needed basis for all LEP persons, including those whose primary language is other than English, Spanish, Bengali, or Arabic. Please see further details in Section 4 below.

#### 4. INVEST DETROIT’S RESPONSE TO STAKEHOLDER LANGUAGE ASSISTANCE NEEDS

Given the wide variety of populations served by Invest Detroit, we are committed to eliminating barriers to entry for any of our programs and/or activities. The language makeup of participants and stakeholders may vary across Invest Detroit’s portfolio of programs. We are particularly sensitive to the needs of lower-income constituents for whom limited English proficiency (LEP) may pose a significant barrier to accessing programs such as those offered by Invest Detroit—programs that may be key to economic advancement and growth.

##### LANGUAGE ASSISTANCE SERVICES ROUTINELY OFFERED FOR LEP STAKEHOLDERS

As noted above, Invest Detroit has previously made efforts to increase the number of staff and other points of contact who are linguistically and culturally diverse to reflect the client population likely to be served. These staff are able to deliver interpretation services to LEP persons on a case-by-case basis, depending on the language spoken by the client and the availability of staff at a particular day and time. In particular, Invest Detroit has staff members who are fluent in Spanish, the language spoken by the vast majority of current LEP clients interacting with Invest Detroit.

Currently, Invest Detroit provides the following language assistance services:

- Invest Detroit translates community engagement materials into Spanish or Bengali when such materials are distributed in areas where the census tract data shows a significant number of Spanish-speaking or Bengali-speaking residents; and
- Administrative staff are aware of the Spanish-speaking persons on staff, and administrative staff have been instructed to utilize their assistance if/when Invest Detroit has a telephone caller who manifests as a Spanish-speaking LEP person.

##### EXPANDED LANGUAGE ASSISTANCE SERVICES TO BE OFFERED: INTERPRETATION

Invest Detroit will be offering the following interpretation services starting in the third quarter of 2024:

- We will have available a list of qualified (trained, professional, neutral third party) interpreters that any staff member may access to assist with interpretation services for their clients. Invest Detroit will have a focus on interpreters for Spanish, Bengali, and Arabic, but we will ensure that third party providers engaged by Invest Detroit have the capacity to offer services in a wide variety of languages potentially spoken by persons who may be contacting Invest Detroit.
- These interpretation services will be paid for by Invest Detroit and offered to clients at their request and at no cost to them.
- Should Invest Detroit engage with an LEP person as a new client, we will ensure that all loan, investment or program documentation will be translated into the client’s primary language; and interpretation services will be available throughout the client’s engagement with the organization.

##### EXPANDED LANGUAGE ASSISTANCE SERVICES TO BE OFFERED: TRANSLATION

The most common ways that an LEP person would interact with Invest Detroit are through our website, our applications for financial products, and our community engagement activities. By the end of the third quarter of 2024, Invest Detroit will do the following:

- Invest Detroit’s website will be available in English, Spanish, Bengali, and Arabic.
- Recognizing that the website may be viewed by LEP persons whose primary language is otherwise, the website will also prominently include a “Language Assistance Notification.” In a wide variety of languages, designed to provide access to likely LEP persons using the website, the notification will invite an inquirer to send an email to a specific Invest Detroit address, indicating the language assistance that will be required for the person to interact with Invest Detroit. Invest Detroit will engage an appropriate interpreter to contact the LEP inquirer within a specified time window.
- Invest Detroit will translate all vital documents into Spanish, Bengali, and Arabic, and provide notification on the Invest Detroit website of the availability of those translated documents:
  - The Ebiara Fund’s website;
  - The ID Ventures website;
  - The lending prequalification form and application;
  - Neighborhood engagement documents (this will be on an ongoing basis, as these are created in advance of any community event Invest Detroit attends);
  - “Who is Invest Detroit?” handout;
  - “Who is ID Ventures?” handout;
  - Language Assistance Policy and Plan; and
  - All other documents identified in the future to be vital documents.
- Should Invest Detroit engage with an LEP person as a new client, we will ensure that all loan, investment and/or program documentation will be translated into the client’s primary language; and interpretation services will be available throughout the client’s engagement with the organization.



## **5. PROMULGATION OF INVEST DETROIT LANGUAGE ASSISTANCE SERVICES TO STAKEHOLDERS AND COMMUNITY PARTNERS**

Invest Detroit promulgates its commitment to language assistance through a program of information, notification, and services addressed directly to limited English proficiency (LEP) stakeholders and communicated to the public at large.

### **DIRECT COMMUNICATION AND SERVICES TO LEP STAKEHOLDERS**

Invest Detroit has designated a Language Assistance Coordinator (LAC) as the primary staff person responsible for implementing and ensuring the success of Invest Detroit's Language Assistance Plan and Policy. Among the LAC's key objectives is to ensure that Invest Detroit fully communicates the availability of language assistance services to persons of LEP at their point of entry to Invest Detroit's programs.

Specifically, the Invest Detroit Language Assistance Plan and Policy, as administered by the LAC, works to ensure the following:

- Signage will be placed in highly visible locations in office entry points, common areas, etc. notifying individuals of the right to request an interpreter at no cost to the individual. Such signage will be translated into the languages most frequently encountered by Invest Detroit, namely, Spanish, Bengali, and Arabic.
- Moreover, staff who are most likely to interact with LEP stakeholders at their initial point of contact with Invest Detroit will verbally notify such individuals of their right to an interpreter at no cost. Staff will be skilled in ways to assess, in a culturally sensitive manner, the need for language assistance services among the constituents they meet at point of entry.
- The Invest Detroit website will consistently highlight on its "landing page" the availability of language assistance services available to potential LEP stakeholders. Such notification will be available in a wide range of languages, as discussed above in Section 4.
- Other specific materials available on the Invest Detroit website, particularly materials that are largely related to lending or investment-based activities or programs, will be highlighted and available in Spanish, Bengali, and Arabic, as discussed above.
- Specifically included in such materials and signage will be written notification of Invest Detroit's Language Assistance Complaints Process, governing a LEP stakeholder's rights to interpretation at no cost, as well as his/her concerns about the quality of language assistance services, including interpreters or translated materials.
- Invest Detroit will use consistent messaging about language assistance services in outreach materials and notices. For example, Invest Detroit may use a standard message such as "This is an important document. For free language assistance, please contact [staff person name and point of contact] at Invest Detroit." Such messaging will be available in Spanish, Bengali, and Arabic.

- Invest Detroit will make active use of social media and other media and community resources to reach targeted audiences with limited English proficiency, in order that LEP stakeholders will be aware of language assistance services even before contacting Invest Detroit.
- The Language Assistance Coordinator will require all Interpreters and translators to bring to the LAC's attention any circumstance or condition that impedes full compliance with the Language Assistance Plan and Policy, including interpreter fatigue, inability to hear, or inadequate knowledge of specialized terminology, and that the interpreter/translator must decline assignments under conditions that make such compliance patently impossible.

#### COMMITMENT TO LANGUAGE ASSISTANCE PRINCIPLES WITH COMMUNITY PARTNERS

- Invest Detroit includes among its standard practices contacting local or regional community agencies who work with LEP persons to solicit their assistance and cooperation in providing appropriate notification and assistance to LEP persons.
- With community partners to whom Invest Detroit distributes federal financial resources, including borrowers, subgrantees, and vendors, as appropriate, Invest Detroit will routinely emphasize the importance of language assistance practices as a vehicle for ensuring that discrimination against LEP individuals is prohibited.

## 6. STAFF PROTOCOLS AND TRAINING FOR LANGUAGE ASSISTANCE SERVICES

Invest Detroit's Language Assistance Coordinator (LAC) is designated as the staff member responsible for developing and administering a Language Assistance Training Program for all staff. This continuously evolving program comprises written policy guidance, written instructional materials, and verbal training for staff regarding the provision of language assistance to persons with limited English proficiency (LEP).

The LAC will develop and promulgate appropriate written protocols and procedures for all Invest Detroit staff. Training requirements will differ among staff, with a focus on those staff most likely to encounter LEP persons. For example, the emphasis in training for Invest Detroit senior managers will focus on familiarity with the Language Assistance Plan and Policy, the complaints process, and promulgation of Invest Detroit's commitments to community partners; the focus for point-of-entry staff will be the ability to access and operationalize interpreter assistance for LEP persons.

Invest Detroit is committed to providing initial training to all staff (as appropriate) no later than the end of CY 2024; thereafter, training will be integrated into onboarding procedures for new staff. Among the topics to be included within the broad Language Assistance Training Program are the following:

- Invest Detroit's commitment to language assistance, and the scope of the Language Assistance Plan and Policy.
- Tools for staff to identify LEP persons and their need for language assistance services, and especially, keys to providing language assistance services in a culturally sensitive manner.
- Protocols for potential communications by phone, in-person, and in writing.
- How to access appropriate interpretation or translation services for LEP persons, including:
  - Ensuring that services will be offered in the primary language of the LEP stakeholder;
  - Knowing who among the Invest Detroit staff are bi/multilingual, and how their services can be accessed;
  - Procedures for obtaining outside interpretation services, including whether services are secured with an interpretation agency or an independent contractor, and whether such services can be obtained through a telephonic or video remote source; and
  - Interpretation best practices.
- The Language Assistance Complaints Process (see Section 7), and the need to ensure that all LEP individuals entering into language assistance services are made aware of their ability to access that process if they believe their rights to quality services have not been fulfilled.

Consistent with Invest Detroit's continuing commitment to language assistance, the LAC will, on an ongoing basis:

- Review and revise written guidance and instructions to staff, and offer verbal training, as needed, to ensure that language assistance planning is sufficient and consistent with policies and practices; and
- Ensure that staff are routinely educated on revisions to policies, revised initiatives, and best practices regarding the provision of language assistance services.

## 7. PROTOCOL FOR CONSTITUENTS TO RAISE CONCERNS/FILE COMPLAINTS

Invest Detroit's Language Assistance Coordinator is the staff person designated as responsible for developing and administering the Language Assistance Complaints Process. The complaints process is designed to ensure that no limited English proficiency (LEP) person doing business or otherwise interacting with Invest Detroit:

- has been denied access to necessary and appropriate language assistance services at any time; and
- has been the recipient of language assistance services or products of insufficient or poor quality, specifically including services of oral interpreters and translated materials.

The complaints process is designed to ensure that any LEP person may initiate a complaint in person or in writing. It is incumbent upon Invest Detroit staff—especially staff interacting with LEP stakeholders at their point of entry into services—to advise such individuals of the availability of the complaints process; this is a routine element of the Language Assistance Training Program (see Section 6). Also, written notification of the Language Assistance Complaints Process, communicating in multiple languages an LEP stakeholder's rights to language assistance services, is included in signage in Invest Detroit office common spaces and on the Invest Detroit website landing page (see Section 5).

The detailed Language Assistance Complaints Process will include the following key elements:

- The record of the complaint should specify the date, individuals involved, and the nature of the complainant's circumstances. For example, was an LEP individual expected to bring his/her own interpreter, and thus denied on-site language assistance services? Another example: was an oral interpreter summarizing discussion, rather than interpreting the dialogue fully?
- The complainant should be advised of the need to submit the complaint to the Language Assistance Coordinator, and he/she should be assisted in doing so by Invest Detroit staff initially hearing the complaint, if necessary.
- The Language Assistance Coordinator will objectively adjudicate the complaint after full investigation of the primary and any secondary circumstances relevant to the complaint. The LAC will notify the parties within 30 days upon receipt of the complaint of his/her findings. Should the outcome of that decision process validate the nature of the complaint, the LAC will advise Invest Detroit's senior management team of recommended remedial actions to be taken.

## **8. ONGOING MANAGEMENT OF LANGUAGE ASSISTANCE PLAN -- MONITORING, EVALUATION, AND CONTINUOUS IMPROVEMENT**

The Language Assistance Coordinator (LAC), in conjunction with and at the direction of Invest Detroit's senior management and its Board of Directors, is responsible to lead and implement a program of continuous monitoring and improvement for Invest Detroit's Language Assistance Policy and Plan and associated activities.

On an ongoing basis, the LAC will employ multiple vehicles to advance continuous monitoring and improvement, including:

- Requiring Invest Detroit staff to share responsibility for monitoring all facets of compliance with Invest Detroit's Language Assistance Plan and Policy; and
- Soliciting feedback and recommended plan/policy enhancements from external stakeholders, but most especially LEP beneficiaries and constituents of Invest Detroit programs and services, as well as external organizations representing the needs and concerns of LEP individuals.

Not less than once every three years, the LAC will review the effectiveness of Invest Detroit's Language Assistance Plan and Policy, collecting information on language usage and needs among constituents served and how those are being addressed by the Language Assistance Plan and Policy. The review will include the following analyses:

- primary languages of demographic communities likely to be served by Invest Detroit programs and services;
- primary languages of clients served, and share of LEP clients;
- frequency of contact with LEP individuals seeking services;
- referrals of LEP individuals to language assistance services;
- usage and language of interpretation services provided to date; and
- distribution and dissemination of translated documents.

Information on the population of LEP stakeholders likely to be served by Invest Detroit will be obtained not just from internal information regarding client intake, but also from publicly available sources, such as the US Census/American Community Survey, US Department of Education, the Federal Interagency Working Group on Limited English Proficiency, etc.

The LAC will report to Invest Detroit senior management on the effectiveness of the Language Assistance Plan and Policy and recommend changes as needed. Invest Detroit's senior management will review any recommendations resulting from the triennial review process and instruct the Language Assistance Coordinator to implement any modifications as warranted.

## **9. CONCLUSION**

Invest Detroit is strongly committed to doing its part to ensure equitable opportunity, voice, and partnership in every facet of our work and throughout Detroit. This includes valuing and promoting diversity in our business practices and working with our partners and communities to combat any practices or activities that exclude or disadvantage specific classes of persons as a result of national origin or culture. Diversity and inclusion are core values of our organization—now and always. This Language Assistance Plan and Policy is one of the many ways in which Invest Detroit guarantees that commitment to diversity and inclusion for our many constituents and stakeholders.