

Primary Care Development Corporation Language Access Plan for Limited English Proficient Individuals

The Primary Care Development Corporation (PCDC) was founded in 1993 as a non-profit public-private partnership and health equity and social justice enterprise with a mandate to bring high-quality and affordable primary care to low-income, underserved, and disinvested neighborhoods. PCDC's mission is to strengthen communities and build health equity through strategic primary care investment, expertise, and advocacy.

PCDC generates economic opportunity in disinvested and low-income communities by providing access to low-cost and flexible financing for use in construction and renovation and has created over 20,000 well-paying construction and health care jobs to date. PCDC also creates financial sustainability by providing technical assistance to hundreds of health care organizations around the country.

Purpose

The purpose of this plan is to identify the responsibilities of PCDC for providing Limited English Proficient (LEP) individuals with meaningful access to vital documents and information about relevant PCDC programs and services (Title VI of the Civil Rights Act of 1964). The following information discusses the translation services available and a brief description of the PCDC's programs and customers, as well as future plans to serve LEP individuals.

PCDC Customers

The volume of service to LEP individuals is extremely small because PCDC works directly with Federally Qualified Health Centers (FQHCs) and independent primary care providers in the United States rather than consumers. The predominant language of health care business in the United States is English (as it is a heavily state and federally regulated industry) and therefore the overwhelming majority of our PCDC borrowers and clients speak English proficiently. PCDC has very limited contact with the general public or direct consumers of health care, and very few if any vital documents for consumers.

PCDC does not provide services directly to the general public. Emails or contact requests from the general public are exceedingly rare. PCDC's customers are exclusively FQHCs, health care providers and health care insurance companies or provider groups.

The only exception is for a small number of activities carried out in Puerto Rico as part of contractual requirements for specific and limited grants, where the activities and materials are provided in Spanish.

PCDC Policy

While PCDC has no day-to-day contact with the general public, we do believe that all people,

regardless of the language they speak, should have meaningful access to information about our programs. The following is PCDC's policy regarding services for LEP individuals.

It is the policy of the Primary Care Development Corporation (PCDC) not to discriminate against any person who is Limited English Proficient (LEP). In accordance with Title VI of the Civil Rights Act of 1964 and the guidelines set forth by the Department of the Treasury, PCDC will take all reasonable steps to provide LEP persons meaningful access to program information upon request.

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 PCDC personnel to follow when providing services to, or interacting with, LEP individuals. Following this policy is essential to the success of PCDC's mission in ensuring reasonable access to LEP individuals.

PCDC provides language assistance, on an as-available basis, either through staff (particularly for Spanish-speaking assistance) and by using contractual services provided by a third-party vendor.

Upon request and within reasonable time restraints, PCDC will provide translations of our information into Spanish or other languages. PCDC will allocate needed resources for translation services based on relevance, time, and/or cost restraints.

Assessment of Need

The following areas within PCDC have general public contact:

- Website
- Website Contact Form

PCDC monitors contact requests daily to determine use and demand for Spanish-language content. Of the 44 contact requests submitted to PCDC between October 2023 and January 2024 (time period is limited due to a website restructuring), Spanish language requests accounted for 0% of total traffic.

PCDC will annually review the Language Access Plan (LAP) with senior management to assess that demand is appropriately met.

Assistance for LEP Individuals

PCDC provides the following for LEP individuals:

- Bilingual staff provide written and verbal translations of materials and other activities into Spanish and use of contracted services for other languages on an as-needed basis.

Demographics

PCDC keeps current on shifting population demographics and needs through an annual review of language requests for materials and consulting, as well as PCDC's website analytics.

Written Translations & Delivery of Content

Upon request and within reasonable time restraints, PCDC will provide translation of its documents free of charge. PCDC will allocate its resources for translation services based on relevance and time and/or cost restraints. PCDC can provide this service through a contracted vendor.

In addition, when requested by a client/partner, PCDC will contract with a qualified consultant to deliver training and capacity building content in the requested language. PCDC will allocate its resources for these services based on relevance and time or cost restraints.

Responsible Staff

The Managing Director of Strategy & Public Affairs acts as PCDC's LEP Coordinator. The Strategy and Public Affairs Department is also responsible for tracking the number of Spanish- and other-language contact requests. PCDC leadership provide guidance and information to staff regarding PCDC's responsibility to LEP individuals.

PCDC's LEP Coordinator can be reached at esummers@pcdc.org.

Nondiscrimination and Civil Rights Information

PCDC provides its non-discrimination statement and civil rights information on its website. If a request were filed in a language other than English, PCDC would use a third-party vendor to translate. PCDC will also monitor any and all feedback submitted regarding LEP Services. In addition, the Nondiscrimination and Civil Rights Information currently lists the e-mail address which accepts discrimination complaints.

Policy Statement

PCDC's LAP and LEP policy are available on the organization website.

Translation Services & Content Delivery

PCDC will contract translation, interpreter services, and qualified training and capacity building professionals through a third-party vendor on an as-needed basis. The need for such services will be reviewed annually.

Webinars

PCDC currently provides a variety of training webinars, which are targeted to FQHCs predominately, and as well to other primary care practices. Upon occasion, PCDC has provided webinars exclusively in Spanish to fulfill grant requirements and when working in Puerto Rico and other Spanish-speaking communities within the continental US. As there have been no such requests to date, regularly scheduled webinars will not be translated into Spanish or any other language unless demand significantly increases.

Information for the General Public

PCDC has a [resources](#) web page for the general public, primarily accessed by health care and economic development professionals. At this time, as there have been no such requests, PCDC has no plans to routinely translate material into any other language unless demand significantly increases.