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language access plan

plan statement

Colorado Housing and Finance Authority (CHFA) recognizes the diverse needs of the communities it serves. CHFA appreciates, embraces and leverages the similarities and differences among its employees, customers, and partners to make better decisions. CHFA is committed to providing individuals meaningful access to our programs and services regardless of their language proficiency. This commitment includes making reasonable accommodations for individuals with limited English proficiency (LEP) and those who speak languages other than English.

purpose and authority

The purpose of this LAP is to establish effective guidelines consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 for CHFA's personnel to follow when providing services to or interacting with individuals who have LEP. Adherence to these guidelines is essential to further CHFA's mission, to strengthen Colorado by investing in affordable housing and community development.

language assistance measures

General Assistance

CHFA provides various resources and services to help ensure there is support for individuals with LEP, particularly under its programs or services where there is or more likely to be such a need. CHFA has determined that most of our LEP customers speak Spanish. The Colorado Department of Local Affairs reports that 22.52% of Colorado self-identify as Hispanic. Therefore, CHFA proactively provides written publications and services in Spanish where appropriate. In addition, should additional language assistance be needed, CHFA has access to interpretation/translation services available in 240+ languages, as well as communication options for individuals who are deaf or hard of hearing.

Nondiscrimination

With respect to its programs, services, activities, and employment practices, CHFA prohibits unlawful discrimination against applicants or employees on the basis of age 40 years and over, race, sex, sexual orientation, gender identity, gender expression, color, religion, national origin, disability, military status, genetic information, marital status or any other status protected by applicable federal, state or local law. CHFA provides this nondiscrimination statement and other civil rights information and resources on its website.

In addition, CHFA provides information on its website for individuals needing reasonable accommodation or the provision of auxiliary aids. The website informs individuals as to applicable protections from discrimination, including steps to take if they believe they have been discriminated against in violation of applicable legal requirements. The following is a link to CHFA's non-discrimination legal notices webpage: <https://www.chfainfo.com/nondiscrimination>.

Hotline Reporting Assistance

CHFA partners with Ethico, an independent ethics and compliance hotline, to provide its employees, customers, and the public with access for reporting issues and concerns. Ethico provides interpretation telephone services for oral reporting in English and Spanish languages. Individuals may also submit written reports through CHFA's online reporting portal offered in both English and Spanish. Individuals may select their preferred language at the links at the top of such reporting portal's homepage. The following is a link to CHFA's online reporting portal: <https://ethico.chfainfo.com>.

Community Development

Under CHFA's Community Development programs, such as the Capital Magnet Fund, CHFA generally does not offer direct services to consumers. Therefore, the interaction with LEP individuals is limited. Under the CMF program, CHFA works directly with entities such as tax credit partnerships and/or entities that include for profit and nonprofit developers, investors, and housing authorities (collectively, the "CMF Borrowers") in providing financing for the preservation or construction of 4 percent or 9 percent Housing Tax Credit projects located in eligible areas and serving incomes at or below 50 percent of Area Median Income.

CHFA Funded Multifamily Properties

Residents of multifamily properties within CHFA's administered portfolio in need of assistance may utilize CHFA's Resident Hotline to assist with various property related questions and concerns. In order to service LEP individuals, this hotline includes an available third-party interpretation/translation service that connects CHFA and the resident to an interpreter to facilitate these interactions to ensure CHFA is fully serving all residents, regardless of language or interpretation needs. CHFA's Resident Liaisons are trained on how to access interpretation/translations services for LEP individuals. CHFA's resident hotline may be reached at 303.297.7442 (Monday-Friday, 8:00am to 5:00pm).

Single Family Loan Programs

Through its statewide network of approved lenders (Participating Lenders), CHFA offers home purchase loan programs as well as grants and second mortgage loan programs for down payment and/or closing cost assistance for eligible prospective homebuyers. Since prospective homebuyers under CHFA's single family loan programs work directly with Participating Lenders, CHFA's contact is limited. CHFA nevertheless offers a variety of language support services for prospective homebuyers including but not limited to:

- A dedicated website in Spanish (<https://www.chfainfo.com/mi-hogar>),
- Identifying Participating Lenders that offer services in Spanish on our website,
- CHFA sponsored homebuyer education courses across the Colorado to help prepare prospective homebuyers for homeownership. CHFA's current homebuyer education program offers free, in-person class options in both English and Spanish, on a regular basis.
- CHFA's goal is to deliver its homebuyer education offerings in the borrower's language proficiency, so CHFA requires its homebuyer education providers to provide accommodations with the assistance of a professional interpreter in the borrower's native/proficient language. The homebuyer education provider will coordinate with the interpretation services, pay for such services and then submit the cost to CHFA for reimbursement. This applies to individuals who need American Sign Language (ASL) interpretation as well, however, in some cases the ASL interpreters are at the group, in-person class and interprets as the instructor teaches the class. This is at the homebuyer education provider's and borrower's discretion to ensure this service meets borrowers' needs.
- CHFA takes steps, including at its lender and real estate professional trainings, to help ensure such industry professionals are aware of the availability of these language and interpreter services made available by CHFA.

Single Family Loan Servicing

As a master servicer of its single family mortgage loan portfolio, CHFA understands the importance for LEP borrowers to have the same servicing experience as English-speaking borrowers. LEP borrowers should not experience any additional barriers due to language. CHFA has formed a loan servicing alliance with Dovenmuehle Mortgage, Inc. (DMI). DMI understands CHFA's unique mission of affordable homeownership and our commitment to the customers and communities that CHFA serves. As such, DMI provides language support services including those listed below. CHFA's Loan Servicing team may be reached at 855.587.8655.

- Dedicated CHFA Spanish telephone line with dedicated Spanish-speaking agents assigned to such line;
- Direct phone number dedicated to CHFA for transferring borrowers directly to such Spanish phone queue line;
- Spanish loss mitigation solicitation letters and other documents are available in Spanish to borrowers who identify themselves as Spanish speaking; and
- Servicing help videos translated in Spanish closed captioning.

monitoring and evaluating

CHFA will continue to monitor and evaluate the effectiveness of this LAP in providing individuals meaningful access to our programs and services regardless of their language proficiency. CHFA will make adjustments or updates to the LAP, if and as may be needed from time to time, including to ensure it continues to meet all legal, regulatory and other applicable requirements. At a minimum this LAP will be reviewed annually and any updates to this LAP will be promptly communicated to impacted staff members.

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