



LANGUAGE ASSISTANCE PLAN

February 2024

Background

Carver Financial Corporation is the holding company for Carver State Bank, a small, community bank with two locations in the city of Savannah. Carver State employs 22 individuals locally and serves approximately 3500 total customers.

According to the most recent Census data, Savannah is 38% White, 53% Black/African American, 3% Asian and 6% Hispanic/Latino. Both Savannah and Chatham County under-index significantly in foreign-born individuals and individuals who speak a language other than English at home as defined by the Census.

Looking specifically at our location, there is a low prevalence of Limited English Proficient (LEP) persons in our customer base. Carver's offices are located in African-American majority areas (Census tracts 12 and 39), which are even less likely to have individuals who speak a language other than English at home. Census tract 39 is 65% African American, 26% White, 3% Hispanic/Latino and 3% Asian. Census tract 12 is 95% African American, 1% Hispanic and 0% Asian. In 2023 Carver's lending customers were 90% African American. 100% were English speaking. We have had no inquiries from non-English speakers over the past five years at minimum. This indicates that the demand for language assistance services is minimal within our locality.

	Total US	Chatham County, GA	Savannah, GA	Census Tract 12	Census Tract 39
White alone, percent	76%	53%	38%	3%	26%
Black or African American alone, percent	14%	41%	53%	95%	65%
American Indian and Alaska Native alone, percent	1%	0.40%	0.20%	0%	0%
Asian alone, percent	6.3%	3%	3%	0%	3%
Native Hawaiian and Other Pacific Islander alone, percent	0.30%	0.20%	0.10%	0%	0%
Two or More Races, percent	3%	3%	5%	0%	1%
Hispanic or Latino, percent	19%	7%	6%	1%	3%
White alone, not Hispanic or Latino, percent	59%	47%	36%	NA	NA
Foreign born persons, percent, 2018-2022	14%	7%	6%	NA	NA
Language other than English spoken at home, percent of persons age 5 years+, 2018-2022	22%	10%	10%	NA	NA

Sources

<https://www.census.gov/quickfacts/fact/table/chathamcountygeorgia,savannahcitygeorgia,US/PST045223>

<https://censusreporter.org/profiles/14000US13051001200-census-tract-12-chatham-ga/>

<https://censusreporter.org/profiles/14000US13051003900-census-tract-39-chatham-ga/>



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While, in our 97 years of service, we have yet to encounter any demand for language assistance services, we acknowledge the importance of accessibility and are implementing several steps to ensure that our products and services are available to LEP persons.

The steps we are taking are in proportion to the very low linguistic diversity in our service area. Additionally, as a small community bank that primarily serves a low-to-moderate income population, cost-effectiveness is a primary concern.

Emphasis on Spanish-Speaking Individuals

Carver's Language Assistance Program will focus on accessibility for Spanish-speaking individuals. Even though unlikely, it's the most likely second language we anticipate that we could encounter. Spanish speakers are currently the most prevalent foreign-language speaking community in our service area with approximately 6% of the Chatham County population being Spanish-speakers (although, again, relative to the national average, we under index in Hispanic/Latino and/or Spanish-speaking individuals.)

We are exploring services for customers who speak languages other than Spanish and will continue to monitor and assess the evolving needs of LEP persons in our area.

Policy

Purpose

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for the personnel of Carver Financial Corporation and Carver State Bank to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to our success in fulfilling our mission: *To Provide The Building Blocks To Financial Freedom.*

General Statement

It is the policy of Carver Financial Corporation and Carver State Bank to provide timely meaningful access for LEP persons to all programs and activities. All personnel shall be notified of current accessibility options to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that Carver will provide these services to them.

Language Assistance Measures

In alignment with our vision of *Financial Freedom for All*, Carver requires staff compliance with respect to reasonable language assistance measures. Staff will be trained that the following language assistance measures will be made available for LEP persons.



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Website Translation

On February 13, 2024 in partnership with our website developer, BankSite Services, we installed a translation plug-in on our website. When customers visit carverstatebank.com they are able to translate the entirety of the website's content into Spanish by clicking on a flag in the top right corner of the site. The vast majority of current information (descriptions, fees, etc.) about our accounts and services is available on our website.

Certified Document Translation

We are in the process of leveraging certified translation services to translate current application documents into Spanish. We expect primary application documents to be translated and made available to the public by Q3 2024.

Contracted Certified Language Interpretation Services

If the need should arise, we will contract with local, certified language interpretation services to provide real-time interpretation either in person or via phone for LEP persons who do not otherwise have access to English interpretation. While interpretation services may not be immediately available, they will be made available within a reasonable timeframe based on the needs of the customer. For immediate needs prior to scheduling with a certified interpreter, staff will be trained on online interpretation software (e.g. Google Translate or other comparable services).

Ongoing Assessment and Monitoring

Currently, there is very little need for an extensive language access program. However, Carver staff will be directed to continually monitor and assess the need for a greater emphasis on language access with quarterly reporting on the number of LEP persons who are accessing the bank's in-person services. We will also continue to monitor demographic changes in our target market as well as tap into the local Spanish-speaking community in order to assess current needs and stay ahead of shifting needs in this regard.

Timeframe

The above-stated measures will be implemented by Q3 2024.

Implementation

Carver's Chief Impact Officer (CIO) will be responsible for plan implementation, ongoing monitoring and assessment of evolving needs with respect to Language Access of LEP persons. If the need should arise, the CIO will act as the Language Access Coordinator in partnership with the bank's Compliance Officer.

Staff will be trained on the availability of services and translated documentation, as well as the availability to utilize local contracted interpretation and translation services as needed.