

Language Access Plan (LAP) for Limited English Proficient Individuals

Introduction and Purpose

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", Urban Beginning Choice Federal Credit Union (UBC FCU) has established the following LAP to ensure that individuals with limited English proficiency (LEP) will have access to all resources and services provided by our credit union. An "LEP individual" is defined as "an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English."

The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals to ensure equity and inclusion for current and potential members. This is essential to our mission of making competitive financial services and products available while increasing financial literacy and personal financial stability for the population we serve.

These efforts have determined the greatest need is within the Hispanic community. UBC FCU holds Low-Income and Minority Depository Institution designations which signifies our long-term vision and commitment to serving the needs of underrepresented populations, which historically has included limited English-speaking individuals.

As a part of developing this plan, we analyzed and balanced the following factors:

1. The number or proportion of LEP persons served or encountered in Urban Beginnings Choice Federal Credit Union's field of membership.
2. The frequency with which the LEP persons encounter the credit union.
3. The nature and importance of the programs, activities, or services provided by the credit union.
4. The resources available, including the cost of the service to the members and credit union.

Persons Charged with Implementing the Plan

The Chief Executive Officer will be responsible for overseeing the implementation of this plan. The Executive Committee of the Board of Directors will be charged with maintaining and updating this plan as the need for changes arises.

Language Access Plan (LAP) for Limited English Proficient Individuals

Identification and Assessment of LEP Communities

To identify LEP individuals in our community, we consulted data from the U.S. Census Bureau, Southeast Strategy Update (City of Fort Wayne), and ZipCode.org. Based on this data, we can identify probable LEP populations in our primary field of membership who are likely to speak a language other than English.

Southeast Fort Wayne

Burmese	8%
Other/Multi-Race	13%
African American	42%
Caucasian	37%

Note: 20% of the above population identify as Latino.

Based on the above statistics, Burmese and Spanish will be the likely non-English languages that will need to be served. To date, UBC FCU as not had any specific request for non-English language assistance, but we recognize the need to be prepared to serve our entire community.

Burmese, Spanish and Multi-race/Other-race languages will be addressed primarily with comprehensive electronic translation devices like PocketTalk and other Apple or Google-based mobile platforms. These devices will be available in the credit union office for use by the staff. As required, live translation services will be employed from local translation services. Additionally, as our population of non-English speaking members increase, we will assess our need to hire permanent staff that can address the appropriate languages.

As our community evolves over time, we will continue to monitor shifts in our population's demographics through periodic assessments to ensure that we are adequately tracking LEP representation in our field of membership. We will also work to identify LEP individuals in our normal encounters with the community by:

- Responding to individual requests for language assistance services
- Collecting and recording primary language data from individuals when they first engage with UBC FCU, during the new account process

Language Access Plan (LAP) for Limited English Proficient Individuals

Language Assistance Services

It is our understanding that these LEP individuals may interact with our staff in several ways:

- Branch assistance
- Contact Center assistance
- Written materials
- Secured Contact Us or Complaints
- Brochures (including bi-lingual)
- Urban Beginning Choice Federal Credit Union Annual Meeting of the Membership
- Community Outreach programs

Due to the variety of encounters that LEP individuals may have with our credit union, UBC FCU will ensure primary brochures are available in multiple languages. To determine the extent of language assistance services provided, we relied on re-assessment of the aforementioned four factors used for analysis, our history, and the necessity of serving those with the greatest need in our market areas.

For these LEP populations, both oral and written language assistance services will be provided.

Oral Language Assistance

Oral language assistance may be necessitated by encounters with LEP individuals either over the phone, in person, or at community events. When one of these encounters occurs, staff members will carry out the following protocol:

For communication over the phone:

The staff members will first try to identify the primary language of the individual. If that staff member is approved as bilingual in the individual's primary language by UBC FCU, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language, then that staff member will utilize an approved translation device, or an interpreter may be used to communicate with the LEP individual.

For communication in person:

The staff members will first try to identify the primary language of the individual, using an "I Speak" language card, if necessary. If that staff member is approved as bilingual in the individual's primary language by UBC FCU, then that staff member may assist the LEP individual directly. If the staff member has not been approved as bilingual in that language,

Language Access Plan (LAP) for Limited English Proficient Individuals

then that staff member will utilize an approved translation device, or an interpreter may be used to communicate with the LEP individual.

For UBC FCU Annual Meeting of the Membership:

An approved interpreter will be provided, upon advanced request, at the meeting. In all meeting notices, we will announce an interpreter can be provided, upon advanced request. A phone number or email will be provided in the notice for LEP individuals to request the interpreter.

For Community Outreach:

An approved interpreter will be assigned based on language demographic at community events.

Written Language Assistance

Written language assistance may be necessitated for several documents, notices, advertisements, forms, etc. "Vital documents" will be translated proactively and made accessible to the LEP communities previously identified. Documents will be classified as "vital" by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences associated with the document, and organizational resources. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Documents not considered vital will be available for oral or written translation upon request. Translated documents will also be accompanied with the following disclaimer:

"We are providing the translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."

In addition to vital documents, all notices of the annual meeting will include a section with key information (date, time, location, and subject matter) translated into the primary languages of the LEP communities previously identified.

Guidelines for Interpreters and Translators

While no formal certification is required for interpreters, translators, or staff members listed on the Staff phone list as bilingual, individuals providing interpretation or translation services must:

Language Access Plan (LAP) for Limited English Proficient Individuals

- Be proficient in and able to communicate information accurately in both English and other applicable language
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator
- Be able to provide the most appropriate Interpretation in a consistent manner.

LEP individuals may bring another individual to provide interpretation who has not been approved for formal interpretation services by the credit union. During these encounters, staff will:

- Inform the LEP individual that free language assistance services are provided
- Use a formal interpreter instead of the informal interpreter, especially if the subject matter of the encounter may be prone to conflicts of interest
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need

When working with an interpreter, formal or informal, credit union staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed
- Briefly explain to the interpreter technical terms that may come up during the communication
- Avoid the use of acronyms, double negatives, and contractions
- Speak in short sentences that contain one idea at a time
- Talk to the applicant and not to the interpreter
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea

Providing Notice of Language Assistance Services

To ensure that members of LEP communities are aware of the free language assistance services provided to them, one or more of the following marketing and outreach steps will be taken:

- Provide "I Speak" language identification cards to front office staff
- Include non-English instructions on the telephone menu
- Place translated materials in conspicuous locations describing different services
- Update key non-English content on the on the website
- Distribute translated materials to community organizations that explain how to access language assistance services

Language Access Plan (LAP) for Limited English Proficient Individuals

- Publish notices in non-English media about programs and services offered
- Provide notification of services with (application, certification, marketing, other) materials

Training Staff on LEP Policies and Services

All staff will receive training on the importance of providing meaningful information and services to LEP communities in a way that they can understand. This training will be included as part of the New Employee orientation and refresher training will be provided annually. After completion of the training, staff should understand:

- Their obligation to provide meaningful access to information and services to LEP individuals
- The protocol for handling various encounters with LEP individuals, as established by this plan
- How to use approved bilingual electronic devices and applications
- How to access translated materials and interpretation services for provision to LEP individuals

Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals. For a staff member to be approved as bilingual, they must pass a standardized language proficiency exam (or some other assessment of proficiency).

Monitoring, Evaluating, and Updating this Plan

As part of their responsibilities, the Executive Committee will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, the Executive Committee will make use of one or more of the following mechanisms:

- Survey staff on how often language assistance services are used and how they could be improved
- Conduct member satisfaction surveys of LEP individuals
- Keep current on community demographics by engaging with local resources
- Monitor the credit union's response rate to suggestions or requests by LEP individuals
- Maintain a record of available services for LEP individuals and the frequency of their use
- Maintain a record of funds and staff time spent on language assistance services

Language Access Plan (LAP) for Limited English Proficient Individuals

Electronic Translation Devices and Applications

Devices

Pocketalk Plus is a multi-sensory, two-way translation device. With a large touchscreen, noise cancelling microphones and a text-to-translate camera, Pocketalk is able to create connections across 112 different languages. The sleek design is equipped with high-quality, noise-cancelling microphones and two powerful speakers so it's easy to have full conversations, even in noisy environments. The camera instantly recognizes and translates text, the written word, and signs. A large touch screen provides text translation for additional clarity.

Applications

- SayHi Translate
- Translate Now - AI Translator
- Speak & Translate - Translator
- Translate
- Google Translate
- Microsoft Translator
- Offline Translator Speak and Translate Pro
- BK Translate
- Or application equivalent with capability