



## LEP non-English speaking member procedure (Supporting Persons with Limited English Proficiency)

---

### **Purpose**

Christian Financial Credit Union (CFCU) is committed to providing reasonable accommodations to residents with Limited English Proficiency (LEP) to the extent required by federal law. To ensure that such persons have reasonable access to support, CFCU will follow the procedure below when serving persons with LEP.

### **Procedure**

#### **1. IDENTIFYING SERVICES TO BE PROVIDED**

CFCU will initiate reasonable steps to determine what services should be provided. We will make that determination by assessing the following factors:

- (i) The number of LEP persons likely to seek services from the credit union;
- (ii) The frequency with which those LEP individuals are likely to seek services from the credit union;
- (iii) The nature and importance of the services the LEP persons are likely to seek;
- (iv) The resources available to the credit union along with the cost of translation; and
- (v) The effectiveness of this procedure and adjusting it as needed, to make sure we are providing the best LEP assistance.

#### **2. PROVIDING WRITTEN TRANSLATIONS**

- (i) CFCU Management will determine what vital documents should be translated and the language(s) of translation. When making this determination, management will consider the factors above and below. All translated documents will be provided free of charge. 100% of all documents that these LEP persons might benefit from, will be translated.

#### **3. PROVIDING INTERPRETATION SERVICES**

When oral interpretation is made available, frontline staff will be provided with the contact information for the interpreter. If the interpreter is on staff, then the name, language, and phone number of the bilingual staff person will be provided.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and only after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by CFCU, if such a service is available. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, the person will not be used as an interpreter.

Children under the age of 16 will **not** be used to interpret in order to ensure confidentiality of information and accurate communication.

#### **4. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

When a LEP service is made available, CFCU will identify the language and communication needs of each LEP person who may benefit from the LEP service as the person seeks service. If necessary, staff will use a language identification card (or “I speak cards,” available online at [www.lep.gov](http://www.lep.gov)) or posters to determine the language. In addition, when records are kept of past interactions with clients, the language used to communicate with the LEP person will be included as part of the record.

- (i) If members do not have a language identification card visible, the Christian Financial Credit Union representative assisting them will ask for their preferred language at the beginning of the interaction.
- (ii) If the person, does not speak English, we will provide LEP services in the language preferred upon resources being available.

#### **5. PROVIDING NOTICE TO LEP PERSONS**

When LEP assistance is made available, CFCU will inform LEP persons of the availability of the language assistance, free of charge, by providing written notice in languages LEP persons will understand. Such notices and signs will be posted and provided in intake areas and other points of entry. Notification may also be provided through one or more of the following: the credit union’s website, outreach documents, or telephone or voicemail menus.

Signs will be posted in various popular languages based on the demographics and the latest census information at the entrance of the branches. LEP Assistance information will be posted on the website homepage.