



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

Purpose

Credit Union Advantage, a division of Zeal Credit Union, is committed to providing reasonable accommodations to residents with LEP to the extent required by federal law. To ensure that such persons have reasonable access to support, Credit Union Advantage, a division of Zeal Credit Union, will follow the procedure below when serving persons with LEP.

Procedure

1. IDENTIFYING SERVICES TO BE PROVIDED

The Credit Union will initiate reasonable steps to determine what services should be provided. Credit Union Advantage, a division of Zeal Credit Union, 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; and
- (iv) the resources available to the credit union along with the cost of translation.
- (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

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. All translated documents will be provided free of charge.

- (i) Branch managers to assess the number of LEP persons that seek services from Credit Union Advantage, a division of Zeal Credit Union, and the frequency in which written translations are needed.
- (ii) 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 the Credit Union, 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.

(i) Internal messaging system readily available to assist members of other languages with their financial needs. We will have adequately bilingual trained staff available to assist in this internal messaging system.

- a. Employees to identify LEP persons and immediately communicate in the chat to get a bilingual representative available for translation in the appropriate language.
- b. Once the representative is available, they can assist LEP members with translation services.

4. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

When a LEP service is made available, Credit Union Advantage, a division of Zeal Credit Union, 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) 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 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

5. PROVIDING NOTICE TO LEP PERSONS

When LEP assistance is made available, Credit Union Advantage, a division of Zeal Credit Union, 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, telephone voicemail menus, local newspapers, radio and television stations, and/or community-based organizations.

- i. Signs will be posted in various popular languages based on the demographics and the latest census information at the entrance of the branches and by each teller stand, including offices.
- ii. LEP Assistance information will be posted on the website homepage.
- iii. LEP assistance information will be included in writing on member's monthly statements.