

Language Assistance Plan for Persons with Limited English Proficiency: “LEP Plan”

March 2024, v.1

Introduction: LEP Plan

1. Introduction

Most individuals in Alternatives Federal Credit Union’s (AFCU) 8-county service area read, write, speak and understand English. However, there is a portion of the population whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing AFCU’s services and benefits.

AFCU takes reasonable actions to provide timely and meaningful access to its services for LEP persons, as detailed in this plan. AFCU staff provide free language assistance services to LEP individuals whom they encounter or when an LEP person requests language assistance services. AFCU informs members of the public that language assistance services are available free of charge to LEP persons.

2. Purpose and Authority

In accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act, this policy establishes guidelines for providing language accessible services to individuals that are limited English Proficient and/or Deaf or Hard of Hearing.

3. Four Factor Analysis

AFCU will consider four factors when assessing language needs and determining what steps it should take to ensure consistent and meaningful access for LEP persons:

- a. The number or proportion of LEP persons eligible to be served or likely to be encountered by AFCU’s programs, activities or services
- b. The frequency with which LEP individuals come in contact with AFCU programs, activities, or services;
- c. The nature and importance of AFCU’s programs, activities, or services; and
- d. Level of resources available to AFCU for LEP-related costs.

4. Definitions

- Limited English Proficient (LEP) individual means any individual whose primary language is not English, and has limited or no ability to speak, understand, read, or write English.

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- Interpretation is the process of orally rendering a spoken or signed communication from one language into another language.
- Primary language means the language that an individual communicates most effectively in.
- Translation is converting written text from one language into written text in another language.
- A qualified interpreter or translator is a trained professional who is a neutral third party with the requisite language skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology to effectively facilitate communication between two or more parties who do not share a common language.
- Sight Translation is the rendering of material written in one language, completely and accurately into spoken speech in another language.

LEP Plan Components

1. Identifying LEP Individuals who Need Language Assistance

- a. Staff at the initial point of contact will assess the need for language assistance and notify the individual of the right to an interpreter at no cost. Staff members who have subsequent contact will continue to assess the need for language assistance.
 - To assess the need for language assistance, staff should ask open-ended questions, and avoid asking questions that would allow for yes or no responses. For example, asking: “how may I be of assistance?” instead of “do you need help?”
 - The LEP individual may speak more than one language or may have limited proficiency in a secondary language. Staff shall identify the primary language of the LEP individual, and work to provide language assistance in the primary language of the individual.
 - A Deaf individual may also be limited English proficient and not be proficient in American Sign Language. Staff shall work to identify the primary language of the Deaf individual and provide language assistance in the primary language of the individual.
- b. The need for language assistance may also be determined if the LEP individual or companion requests such assistance.

2. Identifying Primary Language

Some options for identifying an individual’s primary language include:

- a. Staff may request the individual or companion to identify the language of the LEP or Deaf individual.

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- b. Staff may request bilingual staff or volunteers to identify the primary language (see section 3a of this document).
- c. Staff may use in-person, video remote interpreters, or telephonic interpreters to identify the language.
- d. Staff may use “Interpretation Services Available” or New York State’s “Language Identification Tool” posters to identify the primary language (see poster images in Appendix A and B of this document).

3. Language Assistance Measures

a. Bilingual Staff

- Bilingual staff are under no obligation to provide language assistance services unless it is specifically included in job duties. Bilingual staff may volunteer to provide language assistance to the extent that they are comfortable doing so and may also use the contracted language assistance services (LanguageLine) if they do not wish to volunteer language assistance services.
- For those bilingual staff whose job descriptions do not specify provision of language assistance services, performing language services will be a collateral and volunteer service and is subject to supervisory approval and workload constraints.
- Staff may contact the following Internal Language Access Contact for a current list of bi-lingual staff. The Internal Language Access Contact will determine if staff are available to assist in each circumstance:
 - Reiley Schoen: Chief Operating Officer, rschoen@alternatives.org; 607-216-3414
- If available and applicable, bilingual staff may provide the following services:
 - Identification of the primary language of the individual
 - Interpretation in the primary language of the individual
 - Sight translation of written material
 - Identification of the need for additional language assistance services (i.e. LanguageLine)

b. Account Opening in Spanish

- AFCU offers account assistance appointments in Spanish:
<https://live.vcita.com/site/yk0edaphqm9dgvf5/online-scheduling>
 - If applicable, staff may assist Spanish-speaking clients in choosing this option for scheduling an appointment: “Abre tu nueva cuenta con asistencia en español.”

c. Telephonic/Video Remote Interpreters

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- Staff may access qualified interpreter assistance through the [LanguageLine](#) to provide interpreter services
- Staff may contact the LanguageLine at (888) 808-9008 (PIN: 58553615) for audio-only calls (240 languages available)
- For video calls, staff may open the LanguageLine Application (<https://insight.language.com/>) and request assistance for the appropriate language within the app.
 - 36 languages available, including American Sign Language
 - Note: staff may need set up assistance for first time installation and use of the LanguageLine video calls application; this will be incorporated into periodic staff training.

d. Volunteer Interpreters

- Staff or individuals may contact Cornell University's Translator-Interpreter Program (TIP) at translator@cornell.edu or 607-255-8851 to request language assistance services. These services are offered by Cornell's TIP on a volunteer basis, providing translators/interpreters for community agencies in emergency and non-emergency situations.
- If an appropriate interpreter or translator (speaking the primary language of the individual in need of language assistance) is available to assist in a timely way based on the service requested, staff or individual clients may coordinate a phone, video, or in-person appointment with the required parties.

4. Translation of Documents and Educational Materials

- AFCU's website and mobile site is equipped with Google Translate, which translates all content into 133 different languages. Staff may share this as an additional resource once an individual's primary language is identified.
- For account or loan applications or other forms determined to be "vital forms":
 - AFCU staff may utilize LanguageLine for document translation services
 - Staff may also use LanguageLine, bilingual staff (as appropriate), or Cornell's TIP services to sight translate the document into the individual's primary language.
 - By using the four-factor analysis as listed above and monitoring the implementation and efficacy of this plan over time, AFCU expects to develop a consistent method for determining what documents are vital to the meaningful access of LEP populations served.
- AFCU's Free Financial Education Resources are available in multiple languages:

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- BALANCE services are available in Spanish: <https://alternatives.balancepro.org/resources/articles/nuestros-servicios>
- BALANCE offers services in additional languages by request. Staff or individuals (AFCU members and potential members) may call 1-888-456-2227 to request an interpreter in the individual's primary language.
- BANZAI is available and translated into 10 languages by selecting the appropriate language: <https://alternatives.banzai.org/wellness> (click on globe icon next to search function to choose from 10 available languages).
- Staff should assist individuals in accessing these financial education services once the primary language is identified.

5. Notice of Language Services to LEP Persons

AFCU will provide reasonable notification to eligible LEP individuals so that they understand that language services are available. For effective outreach, AFCU will:

- Consider and apply the appropriate mix of outreach and advertising across a variety of print and digital media
- Partner with community organizations who serve LEP populations to create wider access to AFCU's programs and services (including language assistance services).

At branch and satellite locations, AFCU will also ensure that:

- Signage is placed in visible locations notifying individuals of the right to request an interpreter at no cost to the individual. Signage will be translated into the languages most frequently encountered by the organization.
- At the initial point of contact, staff will notify individuals of their right to an interpreter at no cost.
- Staff will use "I Speak" cards as well as Language Identification posters to encourage individuals to identify their primary language.

6. Unacceptable Practices

- Staff are prohibited from using minor children to interpret, absent emergency circumstances. Clients shall be advised their right to an interpreter at no cost.

Staff Training

Staff members must know their obligation to provide meaningful access to information and services for LEP persons, and to effectively implement this LAP. For this purpose, AFCU will disseminate instructional materials to supervisors, managers, and employees expected to implement the language assistance services set out in this plan.

Staff will receive annual training on:

- the content of the language access policy.

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- how to identify the need for language access services.
- accessing and navigating AFCU's language assistance options, including Bilingual Staff, Cornell's Translator-Interpreter Program, and LanguageLine audio and video services.
- providing language accessible services in a culturally sensitive manner.
- Internal reporting and tracking use of language assistance services

Internal Language Access Contacts

The Internal Language Access Contact will support training, compliance, tracking/documentation, and analysis of this Language Assistance Plan. The Internal Language Access Contact will work with all managers and supervisors to implement this policy.

Current Contact: Reiley Schoen: rschoen@alternatives.org, 607-216-3414

Monitoring, Assessment and Updating the LEP Plan

AFCU will evaluate and monitor implementation of this plan on a biennial basis to ensure that the scope and nature of the language services provided under the plan reflect updated information on relevant LEP populations and their language assistance needs.

This includes examining external data sources such as the US Census and American Community Survey, and internal data sources such as phone inquiries, requests for interpretation and/or translation services, tracking forms, staff and LEP client feedback.

Tracking forms: Staff will track use of assistance services and provide required information to AFCU's Internal Language Access Contact within thirty (30) days of use of the assistance service. AFCU shall collect information such as type of language assistance needed (interpretation, translation, other), primary language of clients, method of language assistance service used (phone, in-person, video relay).

The biennial review process will include the following inquiries:

- How many LEP people were encountered?
- Is the existing language assistance meeting the needs of LEP persons?
- What is the current LEP population in AFCU's service area?
- Has there been a change in the types of languages where services are needed?
- Have available resources, such as technology, staff and finances changed?
- Were any Title VI complaints received?
- Do new staff members understand the LEP plan policies and procedures?

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Additionally, AFCU will monitor and report on whether bilingual staff or contractors performing language services possess the required levels of bilingual proficiency and interpretation and translation skills. AFCU will take reasonable steps to ensure that it provides high-quality interpretation and translation services through individuals who are competent to provide those services at a level of fluency, comprehension, and confidentiality appropriate to the specific nature, type, and purpose of the information at issue.

Changes will be made to this plan as needed and based on the monitoring and assessment process.

Dissemination of Language Assistance Plan Policy

AFCU will post its Language Assistance Plan on its website at www.alternatives.org. Copies of the plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies and/or translations of the plan upon request.

Any complaints, questions or comments regarding this plan should be directed to:

Alternatives Federal Credit Union
ATTN: Reiley Schoen, Language Access Contact
125 North Fulton Street
Ithaca, NY 14850
Phone: 607-216-3414

Compliant Process:

1. A complaint regarding the denial of language accessible services, or regarding the quality of language accessible services, including interpreters or translated materials, may be made in person, or in writing.
2. The complaint should specify the date, individuals involved, and the nature of the client (i.e. the interpreter was summarizing, or an LEP individual or Deaf individual was denied services because they did not bring their own interpreter).
3. All complaints will be directed to the Language Access Contact
4. The Language Access Contacts will notify the parties within 30 days upon receipt of the complaint of the outcome.
5. Staff will notify individuals of the complaint process.

Appendix A: “Languages Spoken/Interpretation Services Available,” posted in lobby and in member-facing offices



Interpretation Services Available

English Translation: Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

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| <p>American Sign Language 👤 Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.</p> | <p>Korean 한국어 귀하께서 사용하는 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.</p> |
| <p>Arabic العربية أشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما سيتم إحضار المترجم الفوري مجانًا.</p> | <p>Mandarin 普通话 请指认您的语言，以便为您提供免费的口译服务。</p> |
| <p>Bengali বাংলা আপনার ভাষার দিকে নির্দেশ করুন। একজন ছোভাষীকে ডাকা হবে। ছোভাষী আপনি নিখরচায় পাবেন।</p> | <p>Nepali नेपाली आफ्नो भाषातर्फ आँल्याउनुहोस्। एक दोभाषेलाई बोलाइनेछ। तपाईंको कुनै खर्च बिना, एकजना दोभाषे उपलब्ध गराइनेछ।</p> |
| <p>Burmese မြန်မာ သင့်ဘာသာစကားကို ညွှန်ပြပါ။ စကားပြန်ဝေခံပေးပါမည်။ သင့်အတွက် စကားပြန်အခမဲ့ပေးပါမည်။</p> | <p>Polish Polski Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.</p> |
| <p>Cantonese 廣東話 請指認您的語言，以便為您提供免費的口譯服務。</p> | <p>Portuguese Português Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.</p> |
| <p>Farsi فارسی زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.</p> | <p>Punjabi ਪੰਜਾਬੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆਂ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆਂ ਦਾ ਮੁਫਤ ਇੰਤਜ਼ਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।</p> |
| <p>French Français Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.</p> | <p>Romanian Română Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret care vă este asigurat gratuit.</p> |
| <p>Haitian Creole Kreyòl Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.</p> | <p>Russian Русский Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.</p> |
| <p>Hindi हिंदी अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुभाषिया बुलाया जाएगा। आपके लिए दुभाषिया की निशुल्क व्यवस्था की जाती है।</p> | <p>Somali Af-Soomaali Farta ku fiiqluqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.</p> |
| <p>Hmong Hmoob Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.</p> | <p>Spanish Español Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.</p> |
| <p>Italian Italiano Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.</p> | <p>Tagalog Tagalog Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.</p> |
| <p>Japanese 日本語 あなたの話す言語を指してください。無料で通訳サービスを提供します。</p> | <p>Vietnamese Tiếng Việt Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.</p> |

Language Solutions: Over-the-Phone, Video Remote, and Onsite Interpreting / Bilingual and Interpreter Staff Testing and Training / Translation and Localization

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