

## Language Access Plan (LAP) for First Central Credit Union

### 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", First Central Credit Union has established the following LAP to ensure that individuals with limited English proficiency (LEP) may access 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."<sup>1</sup>

The purpose of this plan is to establish strategies for interacting with and providing services to LEP individuals to ensure equity and inclusion across membership. This is essential to our mission of our commitment to provide safe, competitive financial services, dedicated to offering the best possible benefits to our members, and to making a difference in the communities we serve while continuing to build capital reserves through innovative and sound business practices.

These efforts have determined the greatest need is within the Hispanic community. First Central holds a "Juntos Avanzamos" designation which signifies our long-term vision and commitment to serving the needs of the Hispanic market. This Juntos Avanzamos (Together We Advance) program is an on-going tribute to our capacity-to-serve and have resources to provide our Hispanic market more effectively -- "Una familia financiera de confianza."

To prepare for the development of this plan, we conducted a Four-Factor Analysis which balanced the following factors:

1. The number or proportion of LEP persons served or encountered in First Central Credit Union field of membership.
2. The frequency with which the LEP persons encounter the credit union.
3. The nature and importance of the program, activity, or service provided by the credit union.
4. The resources available and costs to the member.

### Persons Charged with Implementing the Plan

The Chief Retail Officer will be responsible for overseeing the implementation of this plan. In addition to their oversight duties, this individual will be charged with maintaining and updating this plan as the need for changes arises. The individual will report to President/CEO and will need to coordinate with President/CEO to carry out the directives established by this plan.

### Identification and Assessment of LEP Communities

To identify LEP individuals in our community, we consulted data from the U.S. Census Bureau, Waco Economic Development, and both the Hillsboro and Brownwood Chambers of Commerce/ Economic Development. Based on this data averaged over five years, we can identify probable LEP

populations in our three major field of membership counties to be persons who are likely to speak a language other than English.

#### McLennan County

Hispanic	23.8%
Multi Race	6.32%
Other Race	2.94%
Asian	1.64%

#### Hill County

Hispanic	15.95%
Multi Race	5.15%
Other Race	6.00%
Asian	.08%

#### Brown County

Hispanic	20.71%
Multi Race	3.60%
Other Race	.60%
Asian	1.62%

With an overall average of 20% Hispanic population in our major service counties, First Central prioritizes these probable LEP individuals. First Central has 95 open accounts who requested Spanish speaking assistance, based on recent tracking implementation. Approximately half of the First Central staff is Spanish bi-lingual.

Multi-race and Other-race languages are unknown. Although with a low percentage in our region, these LEP individuals will be accommodated by staff member actions and language devices described below.

As our community evolves over time, we will continue to monitor shifts in our population's demographics through biennial 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 First Central, during the new account process

### Language Assistance Services

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

- Branch assistance
- Contact Center assistance
- Virtual Agent assistance
- Website with Google translation capabilities
- Written materials
- Secured Contact Us or Complaints
- Brochures (including bi-lingual)
- First Central 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, First Central offers and advertises a variety of language assistance services to Hispanic individuals. To determine the extent of language assistance services provided, we relied on our Four-Factor Analysis, our history, and the necessity of serving the greatest need - Hispanic individuals 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 First Central, 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 transfer the call to another staff member who has been approved as bilingual, as listed on the Staff phone list. If no bilingual staff member is available to assist the individual, then a device (see below) or 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 First Central, 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 contact another staff member who has been approved as bilingual, as listed on the Staff phone list, to come and assist the individual. If no bilingual staff member is available to assist the individual, then a device (see below) may be used to communicate with the LEP individual.

#### For communication on our website:

Currently a user can convert our website content into Spanish.

#### For First Central Credit Union 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:

- 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 non-English content on the on the es.firstcentralcu.com Spanish website
- Distribute translated materials to schools and community organizations that explain how to access language assistance services
- 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 the Staff phone list to identify approved bilingual staff members
- 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 Chief Retail Officer will monitor and evaluate the effectiveness of this plan and make updates accordingly. To do this, the Chief Retail Officer 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

Effective May 2024

<sup>1</sup> Executive Order 13166 2

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<https://www.lep.gov/faqs/faqs.html#OneQ1>

## Pocketalk Plus Device

Pocketalk is a multi-sensory, two-way translation device. With a large touch screen, 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 a text translation for additional clarity. Please see language list below:



Azerbaijani	Basque	Belarusian	Bengali
Bosnian	Bulgarian	Burmese	Cantonese
Catalan	Cebuano	Chicewa	Chinese (Simplified)
Chinese (Traditional)	Corsican	Czech	Danish
Dari	Dutch	English (Australia)	English (UK)
English (US)	English (slowly)	English (Philippines)	Esperanto
Estonian	Filipino/Tagalog	Finnish	French
French (Canada)	Frisian	Georgian	
German	Greek	Gujarati	Haitian
Creole	Hausa	Hawaiian	Hebrew
Hindi	Hmong	Hungarian	Icelandic
Igbo	Indonesian	Irish	Italian
Japanese	Javanese	Kannada	Kazakh
Khmer	Korean	Kurdish	Kyrgyz
Lao	Latin	Latvian	Lithuanian
Luxembourgish	Macedonian	Malagasy	Malay
Malayalam	Maltese	Maori	Marathi
Mongolian	Nepali	Norwegian	Pashto
Persian/Farsi	Polish	Portuguese (Brazil)	Portuguese (Portugal)
Punjabi	Romanina	Russian	Samoa
Scots Gaelic	Serbian	Sesotho	Shona
Sindhi	Sinhala	Slovak	Slovenian
Somali	Spanish (Spain)	Spanish (US)	Spanish (Argentina)
Spanish (Columbia)	Spanish (Mexico)	Sundanese	Swahili
Swedish	Tajik	Tamil	Telugu
Thai	Turkish	Ukrainian	Urdu
Uzbek	Vietnamese	Welsh	Xhosa
Yiddish	Yoruba	Zulu	