

# **NOVA CREDIT UNION LIMITED ENGLISH PROFICIENCY (LEP) PROCEDURE**

## **Supporting Persons with Limited English Proficiency (LEP)**

**Nova 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, **Nova Credit Union** will follow the procedure below when serving persons with LEP.

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

**Nova Credit Union** will initiate reasonable steps to determine what services should be provided. **Nova 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
- (iv) the resources available to the credit union along with the cost of translation

### **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 four factors above. All translated documents will be provided free of charge.

### **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 **Nova 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.

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

*When a LEP service is made available, **Nova 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](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.*

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

*When LEP assistance is made available, **Nova 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, and/or community-based organizations.*