



## **Language Assistance Plan**

### United Bay Community Credit Union

United Bay Community Credit Union (Ubay) is dedicated to fostering financial inclusion and community development. This plan focuses on providing equitable access to financial resources for individuals with limited English proficiency (LEP). With Spanish being the second most spoken language in Ubay's service area, this language assistance plan includes a specific emphasis on the Spanish-speaking community.

#### **II. Introduction:**

Acknowledging the diverse linguistic landscape of our community, Ubay underscores the significance of linguistic accessibility, particularly for Spanish-speaking residents. This plan emphasizes our commitment to serving all members of our community, irrespective of language proficiency. The purpose of this Language Access Plan is to make reasonable efforts to eliminate or reduce English proficiency as a barrier to accessing Ubay products, services, and programs.

#### **III. Language Assistance Standard:**

Ubay affirms its commitment to language assistance, ensuring that LEP individuals, especially Spanish speakers, have equal access to financial services. This commitment aligns with the principles of Title VI of the Civil Rights Act of 1964, emphasizing nondiscrimination in programs and activities receiving federal financial assistance. Ubay employees shall take reasonable steps to provide LEP individuals with meaningful access to all products, services, and programs offered by Ubay.

This standard is based on the principle that it is the responsibility of Ubay and not the LEP person to take reasonable steps to ensure that communications between Ubay and the LEP person are not impaired as a result of the limited English proficiency of the individual.

Ubay staff shall take reasonable steps to effectively inform the public of the availability of language accessible programs and activities.

#### **IV. Discriminatory Practices Covered:**

Title VI prohibits organizations receiving federal funds from discriminating against clients/members they serve by failing to provide meaningful access to LEP persons. Discrimination covered by Title VI, E.O. 13166, and this policy includes both intentional discriminatory practices and practices that appear neutral but have a discriminatory effect.

To assure that there are no discriminatory effects, Ubay will review its policies and practices and take reasonable steps to provide meaningful access to LEP persons. Examples of practices which may violate the intent of Title VI are:

- Providing services to LEP persons that are more limited in scope or are lower in quality than those provided to other persons;

- Subjecting LEP persons to unreasonable delays in the delivery of services;
- Limiting participation in a program or activity on the basis of English proficiency;
- Providing services to LEP persons that are not as effective as those provided to those who are proficient in English; or
- Failing to inform LEP persons of their access to interpreter services and/or requiring LEP persons to provide their own interpreter.

**Reasonable Steps in Providing Meaningful Access/Identification of Language Needs:**

Ubay interacts with credit union volunteers, staff, and members; potential members of credit unions; as well as members of the general public. Some of these individuals may have limited English proficiency and may not be able to communicate or understand Ubay’s programs or services. In these situations, Ubay must take reasonable steps to ensure that limited English proficiency (LEP) persons receive the language assistance necessary to afford them meaningful access to Ubay’s programs and services where appropriate. The following four factors assist in identifying what constitutes reasonable steps to ensure meaningful access:

- 1) Number or proportion of LEP persons in the eligible service population;
- 2) Frequency with which LEP persons come into contact with the program;
- 3) Importance of the service provided by the program; and
- 4) Resources available to provide access.

These four factors are useful in conducting a balanced analysis to determine whether reasonable steps are possible when contacts with persons speaking a particular language occur on an infrequent basis.

**V. Language Assistance 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 new employee orientation and refresher training will be provided periodically at staff meetings. Ubay will provide the following language assistance services, with a primary focus on Spanish:

**1. Staff:**

- Ensure staff members receive ongoing cultural competency training, specifically tailored to serving the Spanish-speaking community.
- Ensure financial education presenters are trained and knowledgeable to present course materials in Spanish.

**2. Translation Services:**

- ATM transactions are offered in English and Spanish.
- Key development services documents such as financial education materials are available to be translated as needed.
- Website content is available to be translated as needed.
- Key documents, such as applications, disclosures, and marketing materials will be translated as needed.

- Contract with interpreting services that can provide competent interpreters in a wide variety of languages, in a timely manner.
- Attempt to provide oral interpreter assistance with documents for those persons whose language does not exist in written form.

## **VI. Implementation Plan:**

To seamlessly integrate language assistance services into our operations, Ubay will:

### **1. Staff Responsibilities:**

- Designate specific staff members responsible for language assistance services, particularly for Spanish-speaking members.
- Appointed a Language Access Coordinator to oversee the implementation and maintenance of language services, with a focus on Spanish.

### **2. Community Outreach:**

- Promote language assistance services through community events, newsletters, and social media.
- Utilize Spanish-language communication strategies to inform LEP individuals about available services.

### **3. Feedback Mechanism:**

- Establish a system for collecting feedback on language services, with an emphasis on feedback from the Spanish-speaking community.
- Regularly assess and improve language assistance efforts based on community input.

## **VII. Monitoring and Evaluation:**

Ubay will employ regular assessments and feedback analysis to monitor the effectiveness of language assistance services, with a particular focus on the Spanish speaking community. The results will inform adjustments to the plan to better meet the needs of our Spanish-speaking members.

## **IX. Compliance and Reporting:**

To ensure compliance with applicable laws and regulations, Ubay will maintain records of language assistance activities and provide timely reports to the CDFI Fund and other regulatory bodies.

Ubay is dedicated to promoting financial inclusion through linguistic accessibility, primarily for the Spanish-speaking community. We believe that the successful implementation of this Language Assistance Plan will contribute to building a more inclusive and thriving community.