Civic Federal Credit Union Language Assistance Plan

Background

Civic Federal Credit Union ("Civic") is a non-profit organization with eleven locations across the State and two (2) branch locations within thirty miles of Raleigh, NC. Civic serves approximately 400,000 total members (customers). Civic acknowledges the importance of accessibility and are implementing several steps to ensure that our products and services are available to Limited English Proficient ("LEP") persons. The steps we are taking are in proportion to the linguistic diversity in our service area. Additionally, as a Community Development Financial Institution (CDFI) that primarily serves a low-to-moderate income populations, cost-effectiveness is a primary concern. Our success and commitment to serving local government has always been measured by the difference we make in our members' lives.

Purpose and Scope:

This Language Assistance Plan (LAP) is established to ensure that Civic provides meaningful access to its programs and services for individuals with limited proficiency in the English language, in accordance with federal and state laws. This policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for the personnel of Civic Federal Credit Union to follow when providing services to, or interacting with, individuals who have limited english proficiency. Following these guidelines is essential to our success in fulfilling our mission of neighbors-first banking.

General Statement and Applicability:

It is the policy of Civic Federal Credit Union to provide timely meaningful access for LEP persons to all programs, services, and activities. All personnel shall be notified of current accessibility options to LEP individuals whom they encounter or whenever an LEP person requests language assistance services.

<u>Identification of Limited English Proficiency Individuals:</u>

Civic Federal Credit Union Board of Directors have directed Management to take reasonable steps to provide LEP individuals with meaningful access to all products, services, and programs offered by Civic. All personnel will take reasonable steps to inform members of the public the of the availability of language accessible programs and activities and that language assistance services are available free of charge and that Civic will provide these services to them.

Language Assistance Measures and Model

In alignment with our vision of Financial Freedom for All, Civic Federal Credit Union will provide the following language assistance service(s), with a primary focus on Spanish. Staff will be trained so that the following language assistance measures will be made available for LEP persons.

Emphasis on Spanish-Speaking Individuals

Spanish speakers are currently the most prevalent foreign-language speaking community in our service area.

Language assistance may be provided in various modes, including oral interpretation, written translation, bilingual staff, and the use of language assistance tools and resources. The choice of mode will depend on factors such as the complexity of the communication and the preferences of the LEP individual.

Interpreters may include bilingual staff, contracted language service providers, or telephonic interpretation services. All interpreters will adhere to ethical standards, including maintaining confidentiality.

We are exploring services for customers who speak languages other than Spanish and will continue to monitor and assess the evolving needs of LEP persons in our area.

Contracted Certified Language Interpretation Services

If the need should arise, we will contract with local, certified language interpretation services to provide real-time interpretation either in person or via phone for LEP persons who do not otherwise have access to English interpretation. While interpretation services may not be immediately available, they will be made available within a reasonable timeframe based on the needs of the customer. For immediate needs prior to scheduling with a certified interpreter, staff will be trained on online interpretation software (e.g. Google Translate or other comparable services).

Notification and Outreach:

Civic will display notices on its website informing individuals of the availability of language assistance services. Information about language assistance may also be disseminated through social media channels and printed materials as necessary.

Training:

Staff members will receive training on cultural competence, the importance of language access, and the proper use of language assistance services. Ongoing education will be provided to ensure staff awareness and compliance.

Ongoing Assessment and Monitoring

Civic Federal Credit Union will establish mechanisms to monitor and assess the need for a greater emphasis on language access. Civic Federal Credit Union will monitor demographic changes in our markets. Regular assessments and audits will be conducted to ensure compliance with relevant laws.

Implementation

Civic's SVP of Risk and Compliance will be responsible for plan implementation, ongoing monitoring and assessment of evolving needs with respect to Language Access of LEP persons. If the need should arise, the SVP of Member Experience will act as the Language Access Coordinator in partnership with the Civic's Risk and Compliance Officer.

Feedback and Improvement

A feedback mechanism has been established to allow individuals to report concerns or issues related to language assistance services. Feedback will be used to continuously improve the effectiveness of language access services.

Documentation and Recordkeeping:

Civic will maintain records of language assistance provided, including the languages spoken by LEP individuals, types of services provided, and any challenges encountered. Records will be kept confidential and in compliance with applicable laws.

Legal Compliance:

This Language Assistance Plan is designed to comply with all applicable federal, state, and local laws governing language access and anti-discrimination, including but not limited to Title VI of the Civil Rights Act.

Civic Federal Credit Union is committed to reviewing and updating this plan regularly to ensure its continued effectiveness in meeting the needs of individuals with limited English proficiency