



NuVista Federal Credit Union

Language Access Plan for Individuals with Limited English Proficiency

Background

NuVista Federal Credit Union's plan was developed to enhance access for all and establish guidance to promote meaningful access to NuVista's products and services to individuals with limited English proficiency (LEP). This plan is designed to:

- Align with NuVista's commitment to provide universal access to all we offer;
- Further NuVista's mission of economic empowerment for the underserved with a special commitment to serving LEP immigrant members in our communities;
- Conform with Title VI of the Civil Rights Act of 1964 and Title VI Implementation Regulations and Guidance Documents.

Under federal law, recipients of federal assistance, including CDFI awardees, must comply with Title VI of the Civil Rights Act of 1964 and implementation of regulations which prohibit discrimination and limit participation on the basis of race, color, national origin, sex, disability and age by programs and activities receiving federal assistance.

NuVista is dedicated to providing services for all individuals residing within our Colorado Target Market. In support of our mission, we provide timely, reasonable, and effective language assistance to LEP individuals to decrease language barriers, promote member service, and broaden participation in financial services by linguistically diverse audiences.

Effective Date: 5/13/2024

Applicability

All NuVista programs and employees will comply with this plan.

Definitions

- A. **Bilingual Staff Member:** A NuVista staff member who has demonstrated proficiency in and ability to communicate information accurately in English and at least one other language. A bilingual staff member has the ability to speak or write directly to an LEP individual in a language other than English.
- B. **Interpretation:** The act of listening to a communication in one language and orally converting it to another language while retaining the same meaning.
- C. **Limited English Proficiency (LEP) Individuals:** Individuals who do not speak English as a primary language and who have limited ability to read, speak, write, or understand English;
- D. **Meaningful Access:** Accurate, effective, timely language assistance with NuVista products, programs, and services, provided at no cost, so that LEP individuals' opportunity for participation may be equal to other members' participation, to the fullest extent possible.
- E. **Primary Language:** Language in which an individual most effectively communicates.

- F. Translation: The replacement of written text from one language to another.
- G. Vital Document: Paper or electronic material that is critical to access NuVista’s programs, products, and services.

Agency Overview

NuVista is a CDFI located in Colorado and headquartered at 2711 Commercial Way, Montrose, Colorado 81401. NuVista employs approximately 29 individuals. NuVista’s mission statement is NuVista Federal Credit Union empowers communities by promoting the financial well-being of our members and helping them on their path to financial freedom. NuVista’s mission is consistent with its economic empowerment mission as a CDFI.

Elements of NuVista’s Language Access Plan

NuVista has formed a cross-departmental workgroup to create and implement the Language Access Plan. The workgroup agreed that an effective plan will identify LEP individuals, provide language access, train staff, and document NuVista’s strategy to disseminate information to LEP markets served.

Identification of LEP Communities

As our community evolves over time, we will continue to monitor shifts in our population’s demographics through annual assessments to ensure that we are adequately tracking LEP representation in our jurisdiction. We will also work to identify LEP individuals in our normal encounters with the public by:

- Assuming LEP if communication seems impaired;
- Responding to individual requests for language assistance services;
- Relying on self-identification by the non-English speaker or LEP individual;
- Asking open-ended questions to determine language proficiency;
- Using “I Speak” language identification cards;

Assessment of Need

The following areas within NuVista’s operations have contact with LEP individuals:

- Telephone Service Representatives
- Member Service Representatives
- Loan Personnel
- Account Opening Personnel
- Collections
- Personnel (Employment Opportunities for bilingual individuals) and
- Financial Education
- Website and Printed Account Disclosure, Account Opening, Fee Schedules, and Loan Application Materials

Responsible Staff

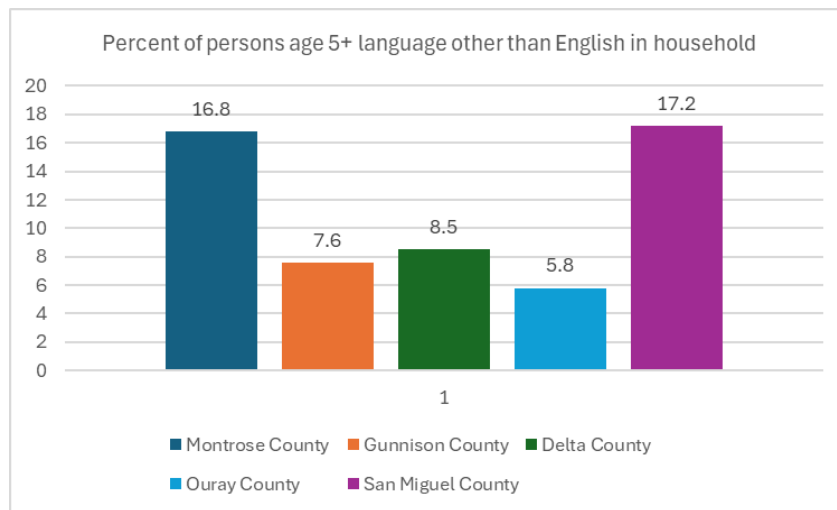
The Grants & Special Initiatives Director of NuVista Federal Credit Union is designated as LEP Coordinator. The LEP Coordinator will track the number of language requests received, ongoing member demographics, and language(s) requested, as well as monitoring traffic to NuVista’s Spanish language website on an ongoing basis. Additionally, the LEP Coordinator is responsible for ensuring notices are displayed in Spanish and other language(s) as deemed appropriate on a move forward basis in intake areas, branch lobbies, and other critical nexus points for LED information dissemination. There will also be a sentence added to all vital documents which states that Spanish translation will be available upon request:

- Para solicitar esta información en español, envíe una solicitud a través de de (info@nuvista.org).

Four Factor Analysis

Our workgroup applies four metrics in creating a plan that ensures LEP individuals have meaningful access to NuVista’s programs, products, and services:

- A. Factor 1: Based on the number of LEP individuals in the State of Colorado and within NuVista’s Target Market who speak English as a second language, NuVista has identified a meaningful percentage of its membership speaks Spanish. According to a 2018-2022 U.S. Census Bureau American Community Survey 3-Year Narrative Profile¹, approximately 16.2% of the population of Colorado spoke a language other than English at home. Those percentages vary in the five-county field of membership that NuVista serves. Montrose County (16.8%), Gunnison County (7.6%), Delta County (8.5%), Ouray County (5.8%) and San Miguel County (17.2%). Approximately 35% of Spanish speakers ages 5+ in Colorado reported that they did not speak English very well. At 11.7%, Spanish was reported to be the most commonly spoken language by individuals five years and older who spoke a language other than English in Colorado. Other Indo-European languages were next at 3.4%, followed by Asian and Pacific Island languages at 2.3%.



¹ <https://www.census.gov/quickfacts/fact/table/TX/POP815222>

- B. Factor 2: The frequency NuVista expects to have contact with LEP individuals seeking assistance has been evaluated based on experience, future projected expansion plans, and demographics of the counties and regions served as well as frequency of LEP individuals seeking assistance.
- C. Factor 3: The nature and importance of NuVista products, activities and services offered may directly assist or impact LEP individuals and their families (example: ITIN Mortgages) therefore NuVista considers the importance and urgency of each program, activity, and product when assessing the need for language services. The usage of LEP services may vary significantly as NuVista's products and services cover a broad spectrum. Once the LEP plan has been implemented, it will be evaluated at least annually and adjusted to optimize access and impact to LEP populations, based on data collected and demand from those served.
- D. Factor 4: The resources available to NuVista and overall cost to provide LEP assistance have been considered.

Prioritization Standard

Due to a continuous need for translation services as products are introduced and policies are updated in response to federal and state regulations, and finite resources, NuVista will utilize the following prioritization standard when providing written translation of vital documents or portions of vital documents, as applicable:

- Are 5% or more of the affected population comprised of LEP individuals who share a common non-English language?
- Pursuant to any Colorado State or US Federal or NCUA requirements as prescribed by law. This workgroup will be informed by NuVista compliance team with any changes.

Providing Services to LEP Individuals

Language services are typically provided by oral interpretation by qualified staff, via telephone by qualified staff, or via written translation. NuVista determines the necessary and reasonable balance between interpretation and translation services by considering multiple factors including member requests, staff feedback, demographics of our Target Market, and availability of resources. NuVista informs LEP individuals that we provide free interpretation and translation services for interacting with NuVista employees upon request. NuVista considers and employs the following reasonable methods of providing effective interpretation and translation services as needed or requested:

- Using interpreters and translators – NuVista provides bilingual staff members, contracts with translators if needed, and uses online translation services.
- Partnering with other agencies and community organizations to provide services to LEP individuals to maximize resources and impact to communities being served.
- Using telephone or electronic interpreter services when hosting events, webinars, and virtual meetings.

- NuVista will also respect an LEP individual's choice to provide their own interpreter or may use one provided by someone else in place of the free language services provided by NuVista.

Translation

NuVista determines vital documents by ascertaining whether denial or delay of access to the services or information would have serious implications to the LEP individual. Documents will be translated if NuVista is required to provide a warning, notice, or other information by law under a different language. NuVista will also translate information critical to obtaining NuVista services, including membership, new account, and lending applications.

NuVista will translate vital documents if the population eligible to be served is directly impacted by the product or service and meets the prioritization standard after consideration of the four-factor analysis.

Training Staff on LEP Policies and Services

As required by law, NuVista provides training to all staff on its nondiscrimination policies and procedures as a routine part of the onboarding process for new employees. All staff will receive information about the importance of providing meaningful information and services to LEP communities in a way that they can understand. 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;
- Who are the credit union's approved bilingual staff members;
- How to access translated materials and interpretation services for provision to LEP individuals.

Monitoring, Evaluating, and Updating this Plan

NuVista will continually strive to improve LEP access to programs, services, products, and activities. This plan is a living document which will be reviewed regularly to evaluate its effectiveness in serving LEP individuals. As part of their responsibilities, the Language Access Workgroup and Coordinator will monitor and evaluate the effectiveness of this plan and make updates accordingly. The evaluation will include but not be limited to:

- Evaluating feedback from LEP individuals
- Soliciting feedback from community-based organizations and other stakeholders;
- Assessing current level of service delivered to LEP individuals;
- Providing ongoing opportunities for member feedback about the LEP and reviewing and considering the feedback;
- Considering new resources such as external funding sources, collaboration with other organizations, technological innovations, etc.;
- And maintaining a record of funds and staff time spent on language assistance services.

Effective Date:

This Language Access Plan shall take effect upon approval by the CEO or President of the Board of the NuVista Federal Credit Union.

APPROVED:

_____**BJ CORAM, CEO**_____

5/13/2024_____

Signature

Date