

## LEPP Monitoring Report - FY2024

**Submitted by: Elaine Crutchfield, Director of Research & Program Support**

The Compliance Office monitored CU's LEPP using the following seven (7) review criteria referenced in the approved LEPP. Monitoring and implementation is support by the Compliance Office which is supported by Haley Reed, Customer Service Associate; Metta Smith, Communications Manager; and, Elaine Crutchfield, Director of Research and Program Support.

Results and recommendations, as appropriate, are summarized beneath each criteria.

1. Current LEP population in service area.
  - Examination of most recent ACS 1-year LEP estimates (Vintage 2022) found no significant changes in state-level LEP populations.
2. Language services requested / provided and for which languages.
  - Spanish and Marshallese
  - Target audience / location.
  - Entrepreneurs, small business owners, borrowers, homeowners with household wells
  - Texas is primary target for consumer borrowers (Spanish).
  - All states use Spanish/English bi-lingual vital documents.
  - Lending is serving Marshallese small business owners in Northwest Arkansas.
3. Whether language assistance services are effective and sufficient to meet the need.

Services were not effective or sufficient in the following example. These examples represent a significant minority of total service usage for the year with all other service meeting expected service level agreements (SLAs).

  - During FY23, staff encountered challenges with the Spanish translation and interpretation services for clients in the Rio Grande Valley (RGV) region of Texas. After considerable research, the Compliance Office determined the following.
    - Clients were having difficulty understanding the dialect of Spanish spoken by the interpreter as well as understanding the meaning of some of the financial/lending related terminology.
    - In many instances the lending terminology has limited flexibility and the interpreter needs the ability to explain the meaning of these terms.
    - Legal and medical staff in the RGV region explain the language as a combination of Mexican Spanish, English and 'slang' terms unique to RGV.

- During FY23, staff experienced longer delays than desirable when connecting with an interpreter via phone. While a minority of calls experienced delays, the length of the delay was unsatisfactory, did not meet the service level agreement (SLA), and created challenges in serving the client(s).
4. Challenges encountered and how they were resolved.
    - The challenges above were of sufficient concern that modifications to the language assistance services were evaluated and implemented as soon as possible.
    - Translation services supporting communication with Spanish speaking borrowers in the Rio Grande Valley was supported through a regional attorney, experienced in the regional dialect. Feedback from bi-lingual staff, local partners and borrowers confirmed improvements in translation products.
    - The contract for Interpretation services was transition to Transperfect Connect. Transperfect Connect is an approved vendor for the GSA Federal Supply schedule 73811 and is endorsed by the Departments of Justice, Agriculture, Homeland Security, Labor and the FDIC. This contract change also reduced CU's annual budgeted cost for translation / interpretation services by approximately 45%.
  5. Feedback from stakeholders, the community, and LEP individuals.
    - See comments above.
  6. Whether CU's financial resources are sufficient to fund language assistance resources needed.
    - CU's financial resources are sufficient.
  7. Determine whether CU complies with the goals of the LEPP.
    - **Compliant:** To the best of our knowledge, CU is compliant with the goals of LEPP and goes beyond compliance requirements to provide language assistance services for the individuals we serve.