



## Language Access Plan Overview

### I. Introduction

REI Oklahoma, Inc. (REI) is an equal opportunity provider, employer, and lender. REI is committed to ensuring equal meaningful access for limited English proficiency persons (LEP). An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.” No LEP individual will be denied access to an REI program because the person does not speak English or communicates in English on a limited basis.

This Language Access Plan (LAP) is intended to facilitate communication with LEP persons in order that they may enjoy equal access to all REI programs and opportunities. It is our intention and goal to remove barriers to accessing our services which are caused by a person’s limited English proficiency.

### II. Needs Assessment

To identify LEP individuals in our community, we consulted data from the American Community Survey provided at [www.lep.gov](http://www.lep.gov). The Civil Rights Language Map App (2015) on that site is an interactive mapping tool that helps users find the concentration of languages spoken by LEP individuals in the state.

#### A. Languages Spoken & Frequency of Contact:

- The data shows the total population of Oklahoma is 3,521,583. The LEP population is 138,641 or 3.94% of the total population. The survey identifies thirty-nine languages are spoken in the state, with the largest segment being Spanish speaking making up 74.9% of the total LEP population. The next two highest were Vietnamese at 6.44% and Chinese at 3.11%. No other group was more than 2% of the total population.
- In addition, our website offers users the ability to change the preferred language for viewing of our website. Analytics show that less than 1% (.52%) of all REI website viewers have selected Spanish as viewing language followed by .29% German and .27% Chinese.
- REI staff encounters LEP persons infrequently. Historically, interactions with LEP individuals have been with those who spoke Spanish.

REI will continue to monitor shifts in our population’s demographics through annual assessments to ensure that we are adequately tracking LEP representation in our state.

#### B. Identifying LEP Individuals Who Need Language Assistance:

To provide meaningful access to LEP individuals, REI must first identify those who need language assistance. REI staff may identify people who are LEP persons through communication in person, in writing, or by telephone. It is noted that REI has a limited number of people that come into the office without an appointment with staff and rarely do we have individuals that do not speak English.

- **In person.** REI has posted a Language and Communication Notice in its reception area. The receptionist and staff have a Language Helper – “I Speak” document to use as a tool for an LEP individual to communicate the language the person speaks when it becomes apparent that they are having difficulty speaking or understanding English. REI staff member will do the following:
  - Rely on self-identification by the non-English speaker or LEP individual.
  - Ask open-ended questions to determine language proficiency.
  - Use “I Speak” language identification cards or posters.
  - If the LEP language is Spanish, contact the bilingual staff member for assistance. Use on demand telephone phone interpreting service if bilingual staff member is not available or if language is other than Spanish.



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- For persons speaking in American Sign Language (“ASL”), this symbol may be used:



- **In writing.** If a staff member receives written communication in a foreign language, the staff member will contact their immediate supervisor to determine the best way to proceed.
- **Telephone.** If a staff member receives a telephone call from a person who speaks a foreign language or ASL, or has a speech or language disability, and is having difficult communicating in English, the staff member will do the following:
  - Rely on self-identification by the non-English speaker or LEP individual.
  - Ask open-ended questions to determine language proficiency.
  - If the LEP language is Spanish contact the bilingual staff member for assistance.
  - Use on demand telephone interpreting service if bilingual staff member is not available or if language other than Spanish.

### C. Language Assistance:

- REI has Spanish speaking bilingual staff who can translate oral and/or written material for Spanish speaking LEP individuals.
- REI’s website has functionality to translate to a variety of different languages based upon LEP individual needs.
- Utilize on demand telephone interpreting service.
- Relay Service for persons with hearing or speech disabilities - The federal and state governments have established free Relay services to provide persons with communication disabilities access to landline phone service. This service can be accessed by dialing 711 or via the Internet. 711 automatically connects to a relay operator. It provides a person with hearing or speech disabilities with access to communication support or ASL interpreters. The service allows consumers to use specialized equipment (such as captioned telephone, TTY, VCO, or HCO) to communicate with standard voice telephone users through specifically trained relay operators.

## III. Language Assistance – Interpreting

### A. Interpretation:

- We will develop a roster of qualified staff members able to serve as interpreters for Spanish speaking LEP individuals.
- Interpreters will be available for in-person meetings, written correspondence, and phone calls.
- Utilize approved volunteers from the community (regional universities), and the local Court systems to identify court approved interpreters that could assist with our interpretation needs.
- On demand interpretation services by telephone.

While no formal certification is required for interpreters, translators, or staff members listed in the Staff Directory as bilingual, individuals providing interpretation or translation services must:

- Be proficient in and able to communicate information accurately in both English and the other applicable language (typically Spanish).
- Understand agency-specific terminology.
- Act in an ethical manner and ensure confidentiality and impartiality in their role as an interpreter/translator.



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- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

If LEP individuals bring in another person to provide interpretation services who has not been approved for formal interpretation services by the organization, REI staff should:

- Inform the LEP individual that language assistance services are provided for free via pre-approved translation services by the organization.
- For initial intake conversations such as providing general information about programs or answering questions, the use of an informal interpreter is permitted. REI will require our designated bilingual staff person to be present in these meetings as well. For any other interaction including closing transactions, counseling, training, etc. the use of a formal interpreter instead of the informal interpreter is required, especially if the subject matter of the encounter may be prone to conflicts of interest.
- Avoid the use of minors as informal interpreters unless there is an extreme and immediate need.

When working with an interpreter, formal or informal, agency staff should:

- Explain to the interpreter the purpose of the communication and the information to be conveyed.
- Briefly explain to the interpreter technical terms that may come up during the communication.
- Avoid the use of acronyms, double negatives, and contractions.
- Speak in short sentences that contain one idea at a time.
- Talk to the applicant directly and not to the interpreter.
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.

### **B. Written Language Assistance:**

Written language assistance may be necessary for several documents, marketing pieces, application forms, etc. "Vital documents" will be translated to Spanish proactively and made accessible to Spanish speaking LEP community.

Documents will be classified as "vital" by balancing the frequency of contact that LEP individuals have with the document, the importance and potential consequences associated with the document, and organizational resources. Anecdotal evidence and data will be used to support these classifications, as it becomes available. Documents not considered "vital" will be available for oral or written translation upon request. Translated documents will also be accompanied with the following disclaimer:

"We are providing the translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."

- We will prioritize the translation of the following key documents: Program and employment Brochures, Loan and Employment Applications, Client Intake Forms, and other forms or documents identified, as necessary.



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### IV. Implementation and Training

#### A. Designated Staff:

- REI has designated staff members who are fluent in Spanish to provide assistive language services to existing and potential REI customers who are LEP individuals.
- All staff members will receive training on the Language Access Plan, cultural sensitivity, and effective communication strategies with LEP individuals. 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. After completion of the training, 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.
  - How to use the Staff Directory to identify approved bilingual staff members.
  - How to access translated materials and interpretation services for provision to LEP individuals.
  - Additional training may be provided to bilingual staff members on specific terminology, ethics, and regionalisms to ensure effective communication with LEP individuals.

#### B. Public Awareness:

- Information about language access services will be available in English and Spanish languages on our website and through translated brochures and posters displayed prominently at our facility.
- Signage will be displayed indicating the availability of language assistance.

#### C. Feedback and Evaluation:

- We will gather feedback from staff and clients on language access services through surveys and suggestion boxes.
- The Language Access Plan will be reviewed and updated annually to reflect evolving needs and community input.