



Pacific Northwest Tribal Lending,
a Community Development Financial Institution
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Language Assistance Program for Pacific Northwest Tribal Lending

General Language Access Policy

1. Policy Statement

"It is the policy of this agency to provide timely meaningful access for LEP persons to all agency programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons, and that the agency will provide these services to them."

2. Purpose and Authority

In accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act and consistent with the values and mission of PNTL, this policy establishes guidelines for providing language accessible services to individuals that are limited English Proficient and/or Deaf or Hard of Hearing.

3. Definitions

- Limited English Proficient individual: any individual whose primary language is not English and has limited or no ability to speak, understand, read, or write English.
- Interpretation: the process of orally rendering a spoken or signed communication from one language into another language.
- Primary language: the language that an individual communicates most effectively in.
- Translation: converting written text from one language into written text in another language.
- Qualified interpreter or translator: a trained professional who is a neutral third party with the requisite language skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology.
- Simultaneous interpretation: the process of orally rendering one language into another language virtually at the same time that the speaker is speaking.
- Consecutive interpretation: the process of orally rendering one language into another language after the speaker has completed a statement or question and pauses.
- Sight Translation: the rendering of material written in one language, completely and accurately into spoken speech in another language.

Mission Statement

To provide access to education, financing, and asset growth,
in order to improve the prosperity and well-being of Native American families.

- Vital Documents: materials that are essential to an individual's ability to access services provided by the organization or are required by law.

Examples of individuals seeking access to PNTL assistance, products and services:

- Persons who are seeking assistance from PNTL or are current clients.
- Persons who are attempting to file a complaint or discrimination complaint on PNTL.
- Persons seeking supportive services from financial education, coaching, or technical assistance.
- Persons seeking assistance and directed to related community partners for assistance, social services, training, or any other assistance from lenders or service providers.
- Parents and family members of the above.

4. Language Data

Organization shall conduct an annual/biennial review of language use and needs of the organization and its service population.

Language Assistance Procedures

1. How to Determine the Need for Language Assistance

- Staff at the initial point of contact will conduct an assessment for the need for language assistance.
- To assess the need for language assistance, staff should ask open-ended questions.
- Staff shall identify the primary language of the LEP individual or Deaf individual.
- Request for language assistance from the LEP individual or companion.

2. Identifying Language

- Staff shall request the individual or companion identify the language of the LEP or Deaf individual.
- Use in-person, video remote interpreters, or telephonic interpreters to identify the language.

3. Procedures for Language Services

- When staff is presented with a person needing interpreter services, they are to access available translators or interpreters.
 - Access The Washington State Coalition for Language Access (WASCLA) ***Interpreter and Translator Directory*** to locate an available translator, spoken language interpreter, or sign language interpreter.
 - <https://apps.wascla.org/directory/>
- Staff members will act as liaison between the client and the language service provider.
 - Staff members will provide telephone access or video conference capability.

4. Translation of Vital Documents

- Organizations will make available vital forms and materials in the most frequently encountered languages.

- For other languages, staff should use an interpreter to sight translate the document into the individual's primary language.

5. Circumstances requiring Interpreter Services include the following:

Interpreter services should be provided in all circumstances where necessary for effective communication in connection with assistance offered by PNTL to a LEP individual and/or in order for the individual to receive full benefit of PNTL services. Examples of circumstances in which interpreters should generally be used include, but are not limited to the following:

- Determination of an applicant/participant's eligibility for description of services needed.
- Provision of applicant/participant's rights, informed consent or release of information.
- Explanation of power of attorney (or their availability)
- Explanation of process or loan determinations.
- Explanation of legal documents and loan documents.
- Provision of equal opportunity policy and reasonable accommodation requests; provision of grievance procedures.
- Provisions resolving payments, billing, and issues that may arise.
- Explanation of loan covenants, check in, or engagement for other services including findings.
- All other instructions.

6. Notice of Language Services

- Signage will be placed in visible locations notifying individuals of the right to request an interpreter at no cost.
- Staff at the initial point of contact will notify individuals of their right to an interpreter at no cost.
- Prompt call for interpreters. Upon assessment of the individual's English language proficiency and the determination that the individual qualifies for as a LEP person, staff members should schedule for an interpreter or direct resources for the interpreter.

In the event of an urgent or emergency situation where the applicant/participant's need for services might be compromised by waiting for an interpreter to come online or use of telephonic interpreter services is not appropriate or available, staff should render any necessary and appropriate assistance, and should make their best efforts to provide the most effective communication possible until such time as a language interpreter arrives on the phone.

7. Prohibition against Using Children as Interpreters & considerations of family/friends.

- Staff are prohibited from using minor children to interpret, absent emergency circumstances.
- Staff members should be alert to situations in which use of a family member or friend to interpret might invade that LEP individual's privacy or impede communication of information and should be avoided.

Staff Compliance

Staff will receive training on the content of the language access policy and related topics no less than annually. All PNTL staff members are expected to adhere to this policy.

Internal Language Access Contacts

Pacific Northwest Tribal Lending Executive Director, Nancy Jordan - (360) 594-6004, NancyJ@LummiCDFI.org

Monitoring and Assessment

- Staff shall be responsible for monitoring compliance with the organization's language access policy.
- Organization shall collect information on language use and need.

Complaint Process

- A complaint regarding language accessible services may be made in person or in writing.
- The Executive Director of PNTL will handle promptly investigate and address complaints and notify the parties of the outcome.

Interpreter and Translator Code of Ethics

1. Accuracy

- Source-language speech should be faithfully rendered into the target language by conserving all elements of the original message.
- Guessing should be avoided, and errors corrected promptly.

2. Impartiality and Conflicts of Interest

- Interpreters and translators are to remain impartial and neutral in proceedings where they serve.

3. Confidentiality

- Privileged or confidential information acquired while interpreting or preparing a translation shall not be disclosed without authorization.

4. Limitations of Practice

- Interpreters and translators shall limit their participation to interpreting and translating.

5. Protocol and Demeanor

- Interpreters shall conduct themselves in a manner consistent with standards and protocol.

6. Maintenance and Improvement of Skills and Knowledge

- Interpreters and translators shall strive to maintain and improve their skills and knowledge.

7. Accurate Representation of Credentials

- Interpreters and translators shall accurately represent their certifications, accreditations, training, and pertinent experience.

8. Impediments to Compliance

- Interpreters and translators shall bring any circumstance or condition that impedes compliance to attention.