

INBK Language Assistance Plan for Limited English Proficient (“LEP”) Individuals

Policy Statement

As a community bank, International Bank of Chicago (“INBK”) is committed to helping the entire community with banking services and products. To that end, we understand that there may be a portion of our community with limited English proficiency (LEP) and may be in need of assistance when entering the bank. It is the policy of INBK to provide effective and meaningful access to LEP persons to all of our products and services. Our personnel shall offer free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. INBK and its personnel will provide general information to members of the public that language assistance services are available free of charge to LEP individuals.

Purpose and Authority

The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for INBK personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). It is the policy of INBK to not discriminate against any person who is LEP. INBK will take all reasonable steps to provide LEP persons with meaningful access to program information through our website or upon request. Following these guidelines is essential to the success of ***our mission to improve social and economic conditions for residents and businesses in our communities in Illinois and New York by offering financial products and development services tailored to their unique needs.***

Steps Taken to Develop a Plan for Language Assistance

- Assessment to understanding how LEP individuals interact with the bank
- Identifying and assessing LEP communities and their needs
- Reviewing and analyzing options for providing language assistance services
- Training staff on policies and procedures
- Providing notice of language assistance services
- Monitoring, evaluating, and updating language access policy directives, plans, and procedures.

Assessment of Language Assistance Needs

Based upon our assessment, the volume of LEP in our community and at our bank is relatively small considering our experience with bank customers and the demographics data from the U.S. Census Bureau. INBK tracks inquiries and estimates that about 42% of our customers are LEP individuals, and that is consistent with the U.S. Census Bureau data regarding the number of people that speak English less than “very well” in Cook and surrounding counties in Illinois (anywhere from less than 1% to 30% depending on the region) and in Orange County New York.

INBK’s interaction with the public is mainly in our retail space and with retail and lending personnel. Asian languages and Spanish are the primary language encountered at INBK for LEP individuals. They will most often need verbal assistance with interpretation.

Language Assistance Measures

INBK has several employees who are bilingual and fluent in Vietnamese, Mandarin, Cantonese, Hindi and Spanish and are available as needed to assist LEP customers. Our staff is available each business day to assist in translation. We believe our in-house translators should sufficiently and reasonably address the LEP needs. Written interpretation needs will be assessed and addressed as needed. Our retail and lending personnel are trained to be watchful for LEP needs and quickly respond to customers needing or requesting LEP assistance. INBK displays notices in the entry way or lobby of the branches notifying customers of this service. These services will be provided free of charge to customers.

Staff Training and Responsibility

INBK provides guidance and information to frontline staff (universal bankers and lenders) and managers regarding INBK’s mission and responsibility to LEP individuals through distribution of our language assistance plan, staff training, and orientation sessions. The training includes simple instructions to staff on how and why this is important. INBK tracks the number of language requests received. Our CDFI Coordinator and/or Human Resources Director oversees the implementation of the Language Assistance Plan, who will also coordinate with the Chief Strategy Officer, Chief Financial Officer, the Retail Manager, and the LAP Coordinator. The LAP Coordinator may be contacted at LAPC@INBK.com. INBK will assess on an annual basis language assistance needs and measures for their effectiveness and efficiency.

Notice of Language Assistance Services

INBK will provide notice of language assistance services through written/bilingual notices in the entry way or lobby of the branches notifying customers of this service. This information will also be displayed near service stations of universal bankers and others. The bank will also post a copy of this plan and other information on our website.

Monitoring, Evaluating, and Updating the Language Access Policy Directives, Plans, and Procedures

Our staff responsible for overseeing and implementing our Language Assistance services (LAP Coordinator, CDFI Coordinator and HR Director) will be engaged in the following:

- Annually reviewing processes and procedures for use of non-English languages
- Evaluating which areas of business would most benefit from LEP services
- Developing quality control mechanisms in the current language assistance plan and measures taken and used
- Establishing any changes or updates to the language assistance plan

[\[1\]](#) As the need for Language Assistance services increases, INBK will implement an increased emphasis on looking for candidates who are bilingual.