

# LIMITED ENGLISH PROFICIENCY LANGUAGE ACCESS PLAN (LAP)

September, 2019

## NORTHFORK ELECTRIC COOPERATIVE, INC. LIMITED ENGLISH PROFICIENCY LAP TABLE OF CONTENTS

Introduction and Background	2
Overview of NFEC's LEP Plan	2
Statement of Policy	3
Purpose and Authority	4
Determining Need: Four Factor Analysis	5
Factor 1	7
Factor 2	12
Factor 3	14
Factor 4	15
Final Considerations and Ongoing Commitment to Access	16
FIGURE	
Figure 1: Eligible Service Area	9
TABLE	
Table 1: Primary LEP Languages	10

## INTRODUCTION AND BACKGROUND

Northfork Electric Cooperative (NFEC) is a non-profit, member owned, electric cooperative that provides reliable services for the best value to our member-owners.

NFEC's seven (7) county service area is located in western Oklahoma, and provides dependable electric service to over 3,200 member-owners. Maintaining over 2,523 miles of line, NFEC exemplifies superior abilities to serve its members with ease and convenience.

NFEC is actively involved in the communities they serve. The communities in which the employees live and work. NFEC's dedication to providing a higher quality of life in its service area is measured only by the satisfaction of the members.

## **OVERVIEW OF NFEC's LEP PLAN**

Consistent with its dedication of serving a diverse membership, NFEC is committed to ensuring effective communication with Limited English Proficiency ("LEP") persons within its eligible service population. LEP persons are defined as individuals who do not speak English as their primary language, and who have a limited ability to read, speak, write, or understand English. NFEC recognizes its responsibility to communicate effectively with LEP persons, and to ensure their access to the services and benefits provided by the Cooperative.

Accordingly, this LEP Plan will serve to affirm NFEC's commitment to LEP persons, as well as to outline the steps NFEC has taken to identify and assist such individuals; to train Cooperative staff; to provide notice of available services; and to monitor and update this Plan as circumstances require.

## STATEMENT OF POLICY

It is the policy of NFEC to provide timely, meaningful access for LEP persons to all Cooperative services, programs, and activities. All NFEC personnel shall provide "free" language assistance services to LEP individuals whom they encounter, or whenever an LEP person requests language assistance services from NFEC.

All NFEC personnel will inform members of the public that language assistance services are available, free of charge, to LEP persons and that NFEC will provide these services to them.

NFEC will also provide training for all personnel to identify and assist LEP persons, and will regularly review this LEP Plan, and perform audits of its effectiveness, in order to ensure the primary goal of communicating effectively with LEP persons is being achieved.

## **PURPOSE AND AUTHORITY**

The purpose of NFEC's Limited English Proficiency Plan is to establish effective guidelines for the staff of NFEC to follow when providing services to, or interacting with, individuals who have Limited English Proficiency.

The Plan is also intended to comply with the requirements of Title VI of the Civil Rights Act of 1964, 7 CFR 15, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," as these regulations apply to recipients of Federal funds. NFEC recognizes that recipients of Federal funds shall not discriminate on the basis of race, color, or national origin; Federal court cases and the United States Department of Justice have determined that this obligation includes providing meaningful access to Federally funded programs to persons with Limited English Proficiency.

On November 28, 2014, the USDA published guidelines in the Federal Register (79 FR 70771) to help those who participate in Federally assisted programs comply with their obligation to provide meaningful access to LEPindividuals.

As described above, in keeping with its dedication to serving a diverse membership, NFEC is committed to ensuring effective and efficient communication with LEP persons within its eligible service population. Further, as a recipient of Federal funding, NFEC has taken reasonable steps to ensure meaningful access to Cooperative services, information, and assistance. This LEP Plan will describe those steps.

Finally, NFEC's commitment is reflected in its Limited English Proficiency Plan adoption resolution, adopted by its Board of Trustees on August 22, 2017 (See Appendix 1: Resolution of the NFEC Board of Trustees) On September 24, 2019 the Board of Trustees approved resolution to update the LEP plan as required by Policy 1.13 Limited English Proficiency Program. (See Appendix 1)

## **DETERMINING NEED: FOUR-FACTOR ANALYSIS**

The Federal government has established the use of a four-factor analysis for organizations to review when determining steps to take to communicate effectively with LEP individuals. This analysis includes the following considerations:

- **Factor 1:** The number or proportion of LEP persons eligible to be served or encountered in the eligible service population.
- **Factor 2:** The frequency with which LEP individuals come into contact with NFEC programs, activities, and services.
- **Factor 3:** The importance to LEP persons of NFEC's programs, activities, and services.
- **Factor 4:** The resources available to NFEC, and costs associated with different language service options.

In addition, in its controlling publication, "USDA Rural Development LEP Implementation Strategy for Federally Assisted Programs," the United States Department of Agriculture (USDA) has suggested specific steps to be taken within each factor.

To determine the need for LEP services within NFEC's eligible service area, it has considered the four factors, as well as the steps recommended by the USDA in its guidance. In undertaking this review, NFEC notes the following thresholds requiring action:

The translation of Vital Documents is required if the applicable U.S. Census data indicates:

- that 1,000 or more in the eligible population in the market area, or among current beneficiaries, are LEP persons; or
- that 5 percent or more of the eligible population or beneficiaries, and 50 or more in number, are LEP persons.

The translated written notice of the right to receive free oral interpretation of documents is required if:

• 5 percent or more of the eligible population or beneficiaries, and fewer than 50 in number, are LEP persons.

No written translation is required if:

• Less than 5 percent of the eligible population or beneficiaries, and less than 1,000 in number, are LEP persons.

NFEC has determined the presence and number of LEP individuals in its service area by identifying the geographic boundaries of the area served by the Cooperative, and by obtaining the U.S. Census data on the LEP populations in that area.

Although not required based on LEP individuals in NFEC's service area, the membership form, bank draft form, and Pay-As-You-Go application have been translated to Spanish. (Appendix 8)

In addition, NFEC has interviewed its staff in order to capture anecdotal data of interactions with LEP persons, and to identify additional areas of contact and need.

## **FACTOR 1**

Consider the number or proportion of LEP persons eligible to be served or encountered in the eligible service population.

#### **Step 1: Prior Experiences with LEP Individuals**

In analyzing the first step of Factor 1, NFEC examined its prior experiences with LEP individuals. To this end, the Cooperative reviewed information relating to its interaction with LEP persons in the following capacities:

#### Contact with existing customer base

Anecdotal evidence indicates that field employees have, on rare occasions, had contact with LEP individuals; however, the majority of contact involves NFEC's Customer Service Department.

#### Calls to customer service telephone line for program services

NFEC utilizes a third-party translation service (Schreiber Translations, Inc.) to translate "on demand" calls from LEP persons that are received in NFEC's office. Customer Service Representatives are trained to quickly recognize the need for translation services, and are authorized to immediately connect the call to a Schreiber operator for assistance. Schreiber supports more than 100 languages and dialects (See Appendix 2: Supported Languages), essentially guaranteeing that LEP callers will be able to effectively communicate with NFEC's Customer Service Representatives.

Schreiber also maintains records of each call handled, on behalf of the Cooperative, and this information is provided to NFEC. The identity and frequency of languages spoken by LEP callers will offer valuable anecdotal data for future Cooperative analysis NFEC also employs a bilingual individual in the office. This individual speaks Spanish, and currently LEP calls from Spanish-speaking individuals are immediately transferred to the bilingual representative for assistance.

NFEC's bilingual Customer Service Representative was questioned regarding his experiences with LEP persons, and indicated the following regarding the frequency of LEP calls:

- Average number of calls transferred to the Cooperative's bilingual CSR for assistance: 5-10 per month
- Number of bilingual CSRs: <u>1 (currently)</u>
- Walk in traffic at NFEC's Office

Office employees were interviewed regarding their degree of interaction with LEP individuals. The average number of walk-ins requiring language interpretation totals <u>3-5 per month</u>. The primary language spoken by those LEP persons was Spanish. CSRs report that the majority of those who come to the facility are generally accompanied by an English-speaking adult or child.

#### Access to website

NFEC has no current data regarding the frequency of visits to its website by LEP individuals; however, in order to ensure access, NFEC has updated the website to offer an option to view the website in Spanish as well as English. Also, Appendix 3 provides sample language that will be added to the website regarding the LEP Plan.

#### Attendance at meetings, hearings, or other public events hosted by NFEC

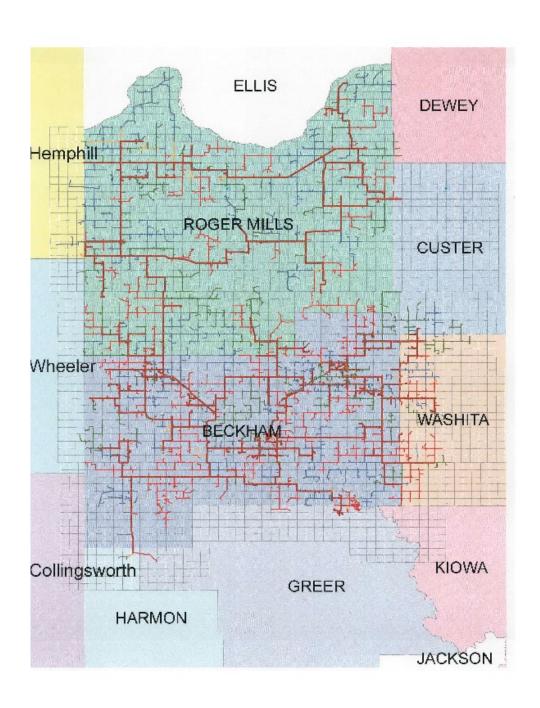
Although there have been no requests for interpretation services at events or meetings hosted by the Cooperative, NFEC does have one Spanish speaking employee who could provide interpretation services if the need arises.

#### Step 2: Data from the U.S. Census Bureau; and

#### Step 3: Identify the geographic boundaries of the area served

In considering the USDA's recommended second and third steps, NFEC analyzed its eligible service area in conjunction with the corresponding U.S. Census data. The service area is depicted in **Figure 1**:

Figure 1: Eligible Service Area



As demonstrated by Figure 1 above, the service area for NFEC includes all of Beckham and Roger Mills counties as well as small portions of Washita, Greer, Custer, Harmon and Dewey counties.

NFEC next reviewed the information contained in the 2010 U.S. Census, as well as the Census Bureau's American Community Survey (ACS), maintained at www.census.gov. Consistent with the Safe Harbor Clause of the LEP guidance, this data also served to determine language groups that equal or exceed five percent (5%) of the regional population that are LEP.

The Census data reviewed by NFEC corresponds to the eligible service area depicted in Figure 1. According to the ACS data in Table 2, this area has a total population of 24,867 individuals. Of these individuals, 22,954 speak only English; 1,913 individuals speak other languages, however, and 874 report speaking English "less than very well." These are the individuals who may require LEP services in their interactions with NFEC employees. (See Appendix 4: Tract Summary and Individual Data)

#### **Step 4: Analysis of Data Collected**

In the next step of the first factor, NFEC used the information obtained in the previous steps to draw conclusions regarding the extent of LEP persons in the eligible service area, and the languages spoken by those individuals. Given the statistical Census evidence presented above, the Cooperative has determined that the following languages constitute those most frequently utilized by LEP persons within the eligible service area:

PRIMARY LANGUAGE	ESTIMATED LEP PERSONS
Spanish or Spanish Creole	824
French	7
Hebrew	13
Vietnamese	7
Tagalog	22
Other Native North American	1

**Table 1: Primary LEP Languages** 

This data closely aligns with the anecdotal data collected by NFEC in the first step of Factor 1, in which it received information from NFEC's bilingual customer service representative. According to him, Spanish speaking members constitute most of the calls.

#### **Step 5: Outreach**

While the U. S. Census data and anecdotal information are consistent, indicating that the majority of LEP persons have been recognized, NFEC will continue its efforts to identify any additional LEP populations that may arise in the future.

## Factor 2

The frequency with which LEP individuals come into contact with NFEC's programs, activities, and services.

While NFEC analyzed the frequency of contact in its analysis of Factor 1, additional information relevant to the implementation of its LEP plan is considered in this step.

#### **Step One: Review the Programs**

NFEC provides electrical service to residential and commercial customers within its defined service area. Customers of the Cooperative are designated as "members," with the right to vote on various aspects of Cooperative leadership, including its Board of Trustees, as well as select bylaw provisions. NFEC also holds Annual Meetings in order to discuss matters of importance to the Cooperative, as well as inform the members of Cooperative business and operations.

Based on interviews with employees, the most frequent contact with LEP individuals are as follows:

- Requests for reconnection or new service;
- Requests for account balance/payment information,
- Requests for information pertaining to billing.

#### **Step Two: Consult Directly with LEP Persons**

As circumstances require, NFEC will consider engaging in additional outreach to identify any barriers to effective communication with LEP individuals. Additionally, NFEC will institute a Policy (See Appendix 5: Policy 1.13 – Limited English Proficiency Program) that sets forth a reporting mechanism for

any qualifying LEP individual to use if faced with a barrier to effective communication with the Cooperative and/or its staff.

The policy also identifies the existence of an LEP Compliance Officer, whose responsibilities include, among other actions, the investigation of any LEP related complaints; the regular review of interactions with LEP individuals; and the overall supervision of the LEP Program.

## Factor 3

## The importance to LEP persons of the Cooperative's Programs, Activities, and Services

#### **Step One: Identify Services**

NFEC recognizes that the critical nature of retail electrical service makes it more likely that language assistance may be needed to ensure access to all LEP individuals. This recognition is also consistent with evidence of contact between NFEC and LEP persons. As indicated above, the primary reasons an LEP individual contacts NFEC are to (1) reconnect service, or establish new service, or (2) to obtain account information or make a payment.

NFEC will continue to analyze its offered services in order to identify any additional areas of potential critical concern to LEP individuals.

#### **Step Two: Input From Community Organizations and LEP Persons**

NFEC encourages feedback from LEP persons regarding their experiences with the Cooperative, as well as any obstacles faced by such individuals in obtaining services or assistance. To this end (and as described above in Factor 2), the Cooperative has developed an LEP Program policy, Policy 1.13, which gives LEP persons the opportunity to bring any issues to the attention of the staff of the Cooperative. In addition, NFEC has designated an LEP Compliance Officer, whose responsibility is to ensure compliance with the objectives of the LEP Plan. This person will also be responsible for investigating and responding to any complaints regarding LEP access. The Policy and the Complaint Form are attached as Appendix 5.

Finally, as noted above, NFEC will periodically review the need for additional outreach to identify any barriers to effective communication with LEP individuals, if circumstances so require.

## Factor 4

#### The Resources Available to the Cooperative and Associated Costs

#### **Step One: Inventory**

The steps currently being taken by NFEC have been outlined above. This includes providing telephonic translation services, as well as the employment of a bilingual individual in the Cooperative's office.

Additionally, NFEC has designated an LEP Compliance Officer to assist in ensuring equal access to services by all LEP persons.

With respect to documents, the Cooperative has determined that translation of vital documents is not necessary due to the size of the LEP community. NFEC will continue to monitor this decision to determine if translation might be needed in the future.

#### **Step Two: Determine Additional Services**

NFEC will consider engaging in additional outreach to identify any barriers to effective communication with LEP individuals for essential services, if circumstances so require.

#### **Step Three: Analyze the Budget**

NFEC considers the voice translation services to constitute normal and ongoing costs of business, and accordingly, such costs, at this time, are not viewed as burdensome to the operations of the Cooperative.

#### **Step Four: Cost Effective Practices**

Whenever it is in the overall best interest of the Cooperative, NFEC seeks to hire bilingual individuals in its customer service department to ensure access to all NFEC services and programs.

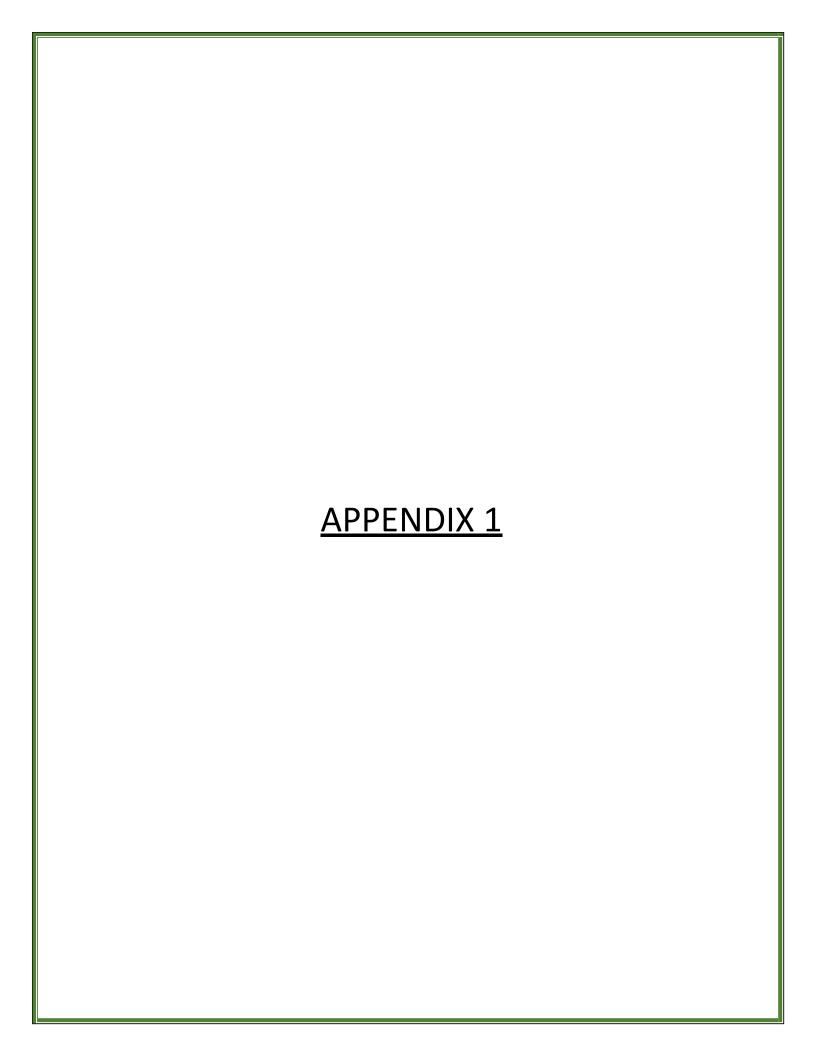
## Final Considerations and Ongoing Commitment to Access

NFEC remains committed to providing access to LEP individuals, and to identifying any barriers to effective communication. To this end, NFEC will take, or has already taken, the following actions:

- Equip each customer service representative with Self-Identification signs so that they are able to assist LEP persons who they come in contact with.
- Adopt an LEP policy with a specified complaint mechanism to ensure effective communication with LEP persons;
- Designate an LEP Compliance Officer with specific responsibilities relating to the oversight and continuing success of the LEP Plan;
- Begin utilizing third party telephonic interpretation services;
- Continue training CSRs in the use of the interpretation services, as well as the existence of the LEP Plan (Appendix 7: Training Documents).
- Engage in a review of the LEP Plan every two (2) years, or as circumstances require;
- Investigate and resolve any LEP-related complaints; and
- Update the NFEC website with LEP information (Appendix 3: Web Page Proposed Text).

As described above, NFEC is committed to ensuring effective communication with the LEP persons within its eligible service population.

It is the belief of the Cooperative that the efforts outlined in this LEP Plan will accomplish that critical goal, and that this LEP Plan satisfies the Cooperative's responsibility to ensure that LEP persons have access to the services and benefits provided by the Cooperative.



#### NORTHFORK ELECTRIC COOPERATIVE, INC.

#### LIMITED ENGLISH PROFICIENCY PLAN

#### **RESOLUTION**

WHEREAS, the management and staff ("Staff") of Northfork Electric Cooperative, Inc. ("Corporation") has determined that, as a borrower of loan funds from the U.S. Department of Agriculture ("USDA"), Rural Utility Service ("RUS"), certain ongoing regulatory compliance requirements exist; and

**WHEREAS**, in accordance with Title VI of the Civil Rights Act of 1964, 7 CFR 15, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," and related case law, define that recipients of Federal funds shall not discriminate on the basis of race, color, or national origin; and

WHEREAS, the USDA has developed a policy which prohibits discrimination, as referenced herein, and focuses on a borrowers' obligation not to discriminate on the basis of "national origin"; and

WHEREAS, the Federal courts and the United States Department of Justice have determined that this obligation includes, among other factors, the providing of meaningful access to Federally funded programs to persons with Limited English Proficiency (LEP); and

**WHEREAS**, on November 28, 2014, USDA published guidelines in the Federal Register (79 FR 70771) to help borrowers, such as the Corporation, who participate in Federally assisted programs, including the RUS loan programs, to comply with their obligation to provide meaningful access to LEP individuals; and

WHEREAS, USDA has published a guidance which sets out the policies, procedures, and steps that USDA fund recipients, such as the Corporation, may take to ensure that LEP persons have meaningful access to Federally assisted programs and activities; and

WHEREAS, the USDA guidance recommends that a RUS borrower, such as the Corporation, adopt a Language Assistance Plan (LAP) which provides a strategy to address the results of a defined four-factor analysis so that persons with LEP have meaningful access to USDA funded programs; and

WHEREAS, the Corporation has followed the guidance provided by USDA, thereby demonstrating that, as a borrower, the Corporation is meeting its meaningful access obligations and effecting compliance with USDA's requirements; and

**WHEREAS**, the Staff of the Corporation has developed certain activities and programs in support of the Corporation's LEP efforts; and

WHEREAS, the Board, at its regular meeting held on August 22, 2017, reviewed and considered the Staff's proposed Limited English Proficiency Plan ("Plan") and supporting policy, Board Policy 1.13, Limited English Proficiency Program ("Policy"); and

#### NORTHFORK ELECTRIC COOPERATIVE, INC.

#### LIMITED ENGLISH PROFICIENCY PLAN

#### **RESOLUTION**

**NOW THEREFORE, BE IT RESOLVED**, that the Board does hereby approve the Corporation's Plan and the associated Policy and does accept it as the Corporation's official Plan in the furtherance of the LEP objectives and requirements, as stated therein; and

**BE IT FURTHER RESOLVED**, that the General Manager is hereby authorized and empowered, by the Board, to implement any and all programs of the Corporation in support of the Corporation's efforts in the furtherance of the LEP objectives stated herein.

#### CERTIFICATION

I, Ransom Snowden, Secretary of the Northfork Electric Cooperative, Inc. do hereby certify that the foregoing is a true and correct copy of excerpts from the minutes of a regular meeting of the Board of Trustees of the Northfork Electric Cooperative, Inc. of Sayre, Oklahoma, held on the 22<sup>nd</sup> day of August, as appears in the minutes book of the Corporation.

Ransom Snowden
Secretary

(SEAL)

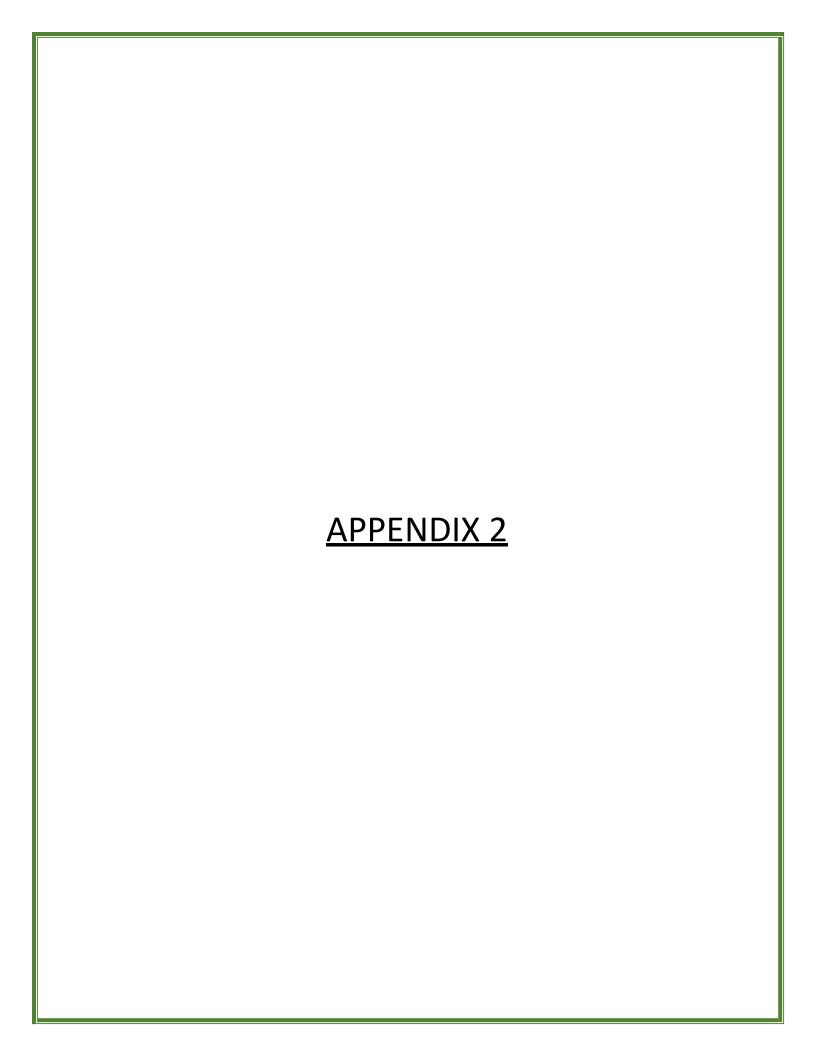
#### **Northfork Electric Cooperative, Inc. Limited English Proficiency Plan**

#### **RESOLUTION**

RESOLVED THAT: The Board of Trustees of Northfork Electric Cooperative, Inc., hereby
approves action to update the Limited English Proficiency Plan as required by section two (2)
subsection C, paragraph four (4) of policy number 1.13 Limited English Proficiency Program.

I, Ransom Snowden, do hereby certify that I am Secretary of the Northfork Electric Cooperative, Inc. and that the foregoing resolution was adopted at a meeting of the Board of Trustees of the Northfork Electric Cooperative, Inc. held on September 24, 2019 at which a quorum was present.

Ransom Snowden, Secretary



#### **Languages Supported for Translation and Interpretation Services**

At Schreiber Translations, Inc. (STI), we have provided our clients with translation and interpreting services in more than 120 different languages and dialects.

Here is a list of some of the languages offered.

#### A - C |

Afrikaans Translation

Akan (Twi) Translation

Albanian Translation

American Sign Language (ASL) Interpreting

**Amharic Translation** 

**Arabic Translation** 

**Armenian Translation** 

Azerbaijani Translation

Balochi Translation

**Basque Translation** 

Bengali Translation

**Bosnian Translation** 

Bulgarian Translation

**Burmese Translation** 

Byelorussian (Belarusian) Translation

Carolinian Translation

Catalan Translation

Cebuano Translation

Chamorro Translation

**Chinese Translation** 

**Chuukese Translation** 

**Croatian Translation** 

**Czech Translation** 

#### **D** - **F** |

**Danish Translation** 

Dari Translation

DinkaTranslation

**Dutch Translation** 

English

Dzongkha Translation

**Estonian Translation** 

**Ewe Translation** 

Farsi (Persian) Translation

Finnish Translation

Flemish Translation

French Translation

Fulani (Fula) Translation

#### G - I |

Georgian Translation

German Translation

**Greek Translation** 

Guarani Translation

Gujarati Translation
Haitian-Creole Translation
Hakha Chin Translation
Hausa Translation
Hebrew Translation
Hindi Translation
Hmong Translation
Hungarian Translation
Icelandic Translation
Igbo Translation
Ilocano Translation
Indonesian Translation
Irish (Gaelic) Translation
Italian Translation

#### **J** - L |

Japanese Translation
Kannada Translation
Karen Translation
Kazakh Translation
Khmer (Cambodian) Translation
Kirghiz (Kyrgyz) Translation
Korean Translation
Kurdish Translation
Lao Translation
Latin Translation
Latin Translation
Lithuanian Translation
Luxembourgish Translation

#### M - P

Malayalam Translation Malagasy Translation Malaysian Translation Maltese Translation Marathi Translation Marshallese Translation Mongolian Translation Navajo Translation Ndebele Translation Nepali Translation Norwegian Translation Oromo Translation Palauan Translation Pashtu (Pashto) Translation **Persian Translation Polish Translation** Portuguese Translation Punjabi Translation

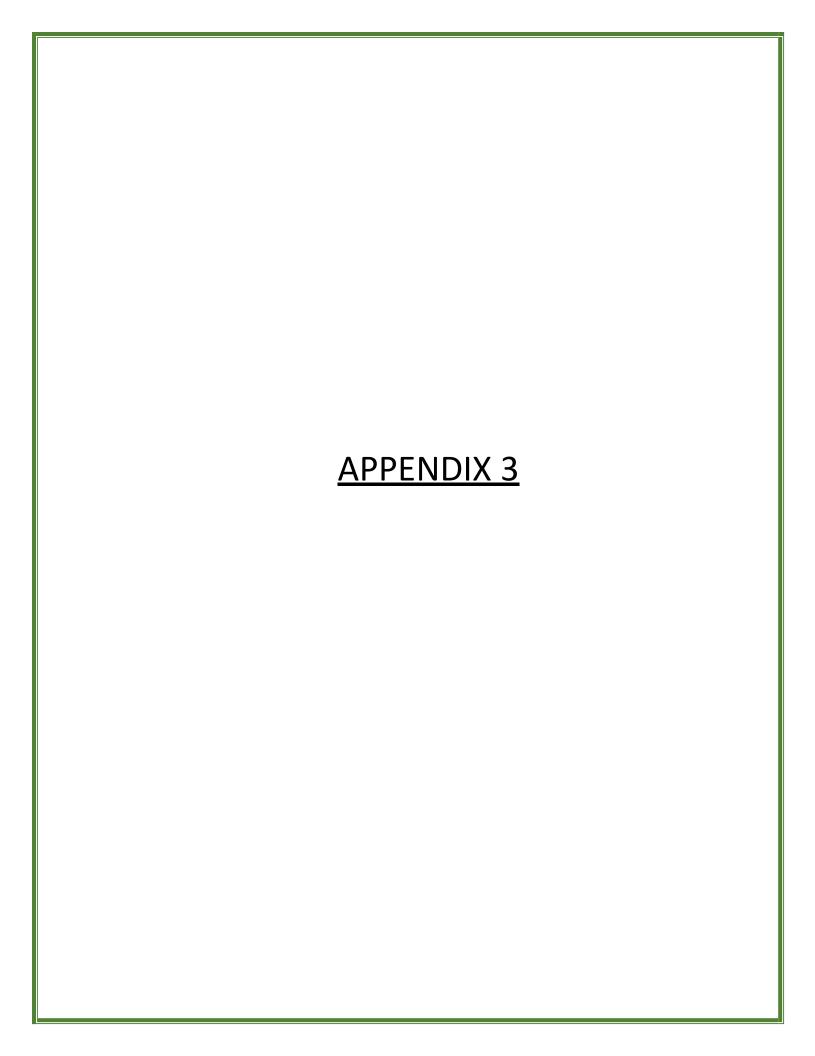
**Macedonian Translation** 

Quechua (Quechuan) Translation Romanian Translation **Russian Translation** Samoan Translation Sanskrit Translation **Serbian Translation** Sindhi Translation Sinhala Translation **Slovak Translation** Slovene Translation Somali Translation **Spanish Translation** Swahili Translation **Swedish Translation Tagalog Translation Tamil Translation Telugu Translation** Thai Translation **Tibetan Translation Tigrinya Translation** 

#### U - Z |

Ukrainian Translation
Urdu Translation
Uyghur Translation
Uzbek Translation
Vietnamese Translation
Wolof Translation
Xhosa Translation
Yiddish Translation
Yoruba Translation
Zulu Translation

Tongan Translation Turkish Translation Turkmen Translation,



#### NFEC Limited English Proficiency Plan Web Page Proposed Text

Dated: <u>09/24/2019</u>

Proposed Text

#### **Limited English Proficiency (LEP)**

#### **Overview**

NFEC is required under Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", to provide limited English speaking individuals with additional resources. Listed at this site are the various resources offered to Limited English Proficiency (LEP) individuals by NFEC.

#### NFEC's Limited English Proficiency Plan

A PDF version of NFEC's Limited English Proficiency Plan, dated September 2019 is included here. This Plan has been reviewed and approved by NFEC's Board of T and outlines the steps that have been taken by NFEC to assist LEP individuals in accessing NFEC's services and programs.

#### <u>Limited English Proficiency Complaint Procedure</u>

Limited English Proficiency Complaint Procedure (See Policy 1.13, Limited English Proficiency Program and the associated complaint form) for those LEP individuals within NFEC's service area. The complaint form can be used to offer comments and to report any problems relating to access of NFEC's essential services.

#### What Language Do You Speak?

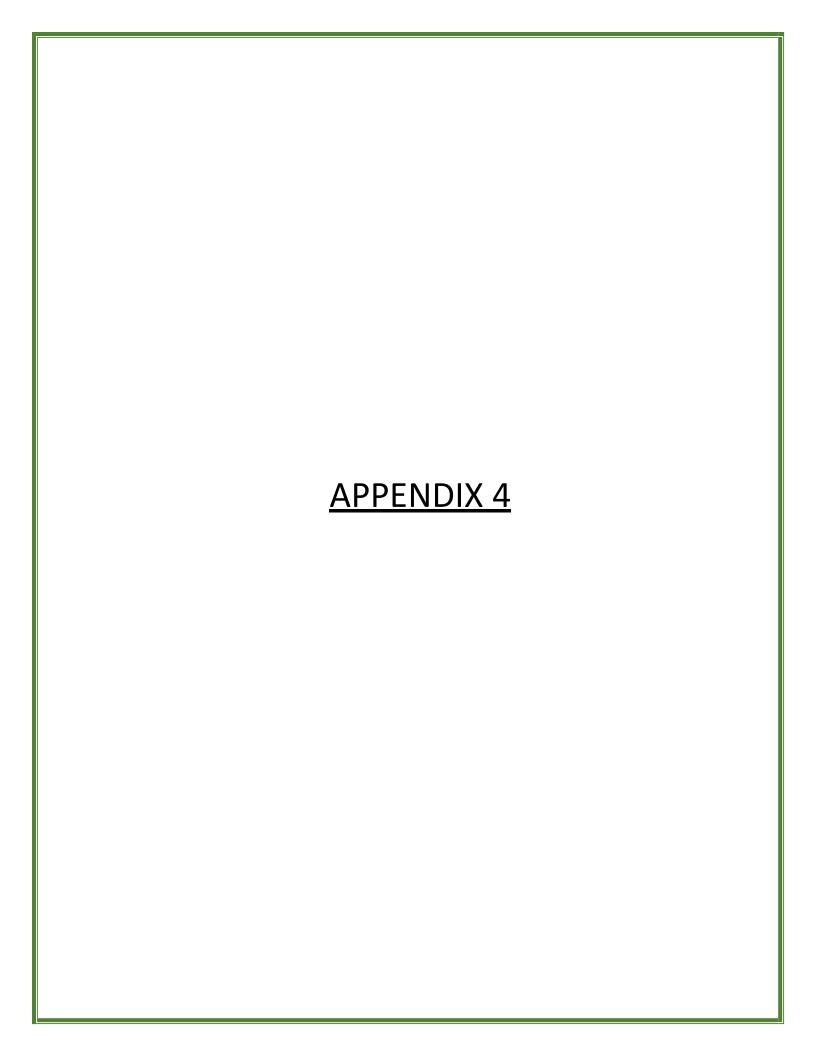
To aid LEP individuals seeking essential services from NFEC facilitate communication, with NFEC staff, we have provided a "Speak" reference form.

### NFEC Limited English Proficiency Plan Web Page Proposed Text

Dated: <u>09/24/2019</u>

#### Contact Us

NFEC's LEP Compliance Officer is assigned by the General Manager. Any interested party may contact NFEC's Compliance Officer by calling (580) 928-3366.



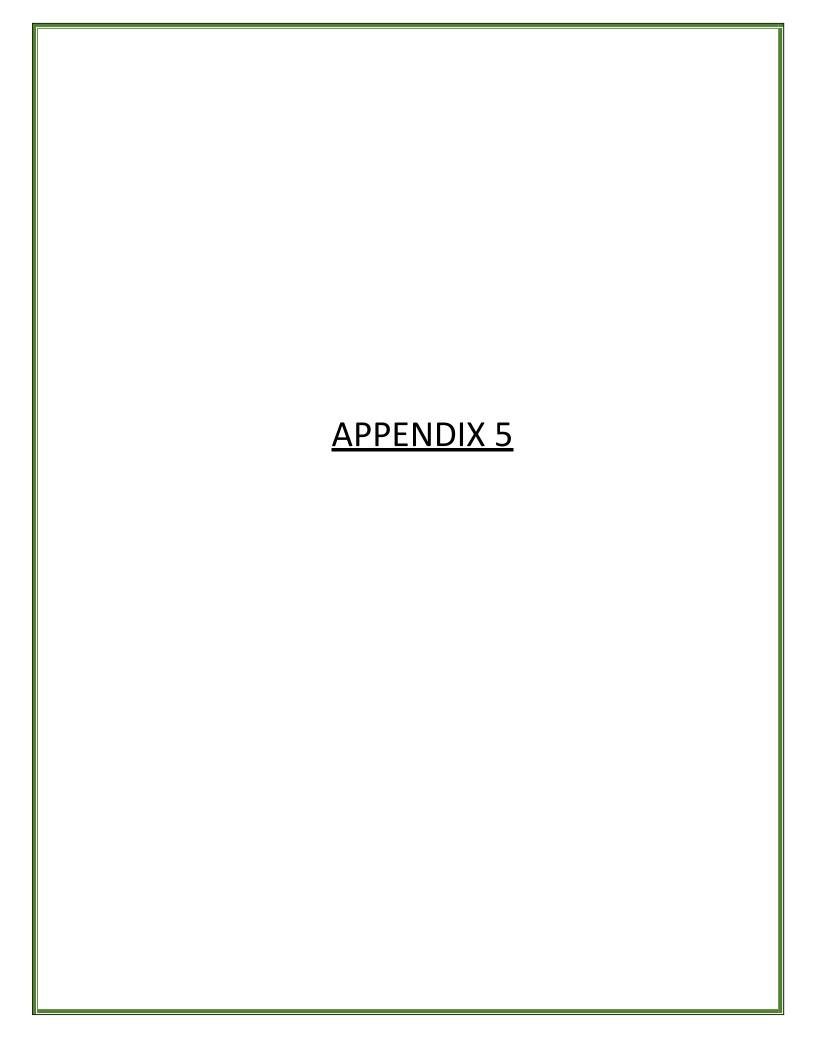
#### Northfork Electric Cooperative, Inc. Limited English Proficiency Plan 2011-2015 American Community Survey

#### NFEC Service Area

	Beckham County, Oklahoma		Roger Mills County, Oklahoma	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	21,337	+/-67	3,530	+/-29
Speak only English	19,497	+/-286	3,457	+/-40
Spanish or Spanish Creole:	1,646	+/-283	55	+/-35
Speak English "very well"	831	+/-184	46	+/-31
Speak English less than "very well"	815	+/-247	9	+/-14
French (incl. Patois, Cajun):	14	+/-20	0	+/-9
Speak English "very well"	7	+/-16	0	+/-9
Speak English less than "very well"	7	+/-11	0	+/-9
French Creole:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Italian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Portuguese or Portuguese Creole:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
German:	20	+/-25	2	+/-3
Speak English "very well"	20	+/-25	2	+/-3
Speak English less than "very well"	0	+/-17	0	+/-9
Yiddish:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Other West Germanic languages:	8	+/-17	0	+/-9
Speak English "very well"	8	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Scandinavian languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Greek:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Russian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Polish:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Serbo-Croatian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9

Other Slavic languages:	0	+/ 17	0	±/0
		+/-17	<b>\</b>	+/-9
Speak English logg than "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Armenian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Persian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Gujarati:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Hindi:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Urdu:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Other Indic languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Other Indo-European languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Chinese:	9	+/-16	0	+/-9
Speak English "very well"	9	+/-16	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Japanese:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Korean:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Mon-Khmer, Cambodian:	8	+/-16	0	+/-9
Speak English "very well"	8	+/-16	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Hmong:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Thai:	0	+/-17	1	+/-2
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	1	+/-2
Laotian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Vietnamese:	15	+/-17	0	
			-	+/-9
Speak English loss than "very well"	8	+/-16	0	+/-9
Speak English less than "very well"		+/-16	0	+/-9
Other Asian languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9

Speak English less than "very well"	0	+/-17	0	+/-9
Tagalog:	76	+/-44	0	+/-9
Speak English "very well"	54	+/-29	0	+/-9
Speak English less than "very well"	22	+/-16	0	+/-9
Other Pacific Island languages:	0	+/-17	4	+/-6
Speak English "very well"	0	+/-17	4	+/-6
Speak English less than "very well"	0	+/-17	0	+/-9
Navajo:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Other Native North American	31	+/-41	11	+/-12
languages:				
Speak English "very well"	31	+/-41	10	+/-11
Speak English less than "very well"	0	+/-17	1	+/-2
Hungarian:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Arabic:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Hebrew:	13	+/-26	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	13	+/-26	0	+/-9
African languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9
Other and unspecified languages:	0	+/-17	0	+/-9
Speak English "very well"	0	+/-17	0	+/-9
Speak English less than "very well"	0	+/-17	0	+/-9



#### NORTHFORK ELECTRIC COOPERATIVE, INC.

#### **POLICY NO. 1.13**

#### SUBJECT: LIMITED ENGLISH PROFICIENCY PROGRAM

#### I. <u>OBJECTIVE</u>

- A. To ensure effective communication with Limited English Proficient (LEP) individuals within the eligible service population of Northfork Electric Cooperative, Inc. (Cooperative), and to ensure access by LEP individuals to essential services and benefits provided by the Cooperative.
- B. To define the process such that an LEP individual may file a formal complaint with the staff of the Cooperative.
- C. To provide the staff of the Cooperative with a systematic approach to receive, process and respond to LEP complaints filed with the Cooperative by or on behalf of LEP individuals.
- D. To communicate and memorialize the standard of care required when addressing LEP complaints received by the Cooperative.

#### II. <u>CONTENT</u>

#### A. General

- 1. The staff of the Cooperative have proposed herein and the Board of Trustees (Board) have approved, a formal process to receive, process and respond to bona fide LEP complaints filed with the Cooperative.
- 2. The General Manager's his/her designee shall be considered the LEP Compliance Officer.

#### B. <u>Requirements</u>

- 1. Any individual who believes that the Cooperative has discriminated against them, or against a class or persons, in violation of the Cooperative's LEP Program, may file a complaint with the Cooperative within 180 days after the date of the alleged discrimination. Failure to file a LEP complaint within 180 days may lead to dismissal of the complaint.
- 2. Once a LEP complaint has been received by the staff of the Cooperative, such LEP complaint shall be forwarded to the LEP Compliance Officer or his/her designee to be processed as outlined herein.

## LIMITED ENGLISH PROFICIENCY PAGE 2

- 3. The LEP individual filing the complaint should, at a minimum, provide the following information for a complaint to be considered valid:
  - a. The name, address, telephone number, and signature of person filing the LEP complaint;
  - b. Facts and circumstances surrounding the LEP complaint, including the date of the allegation, and the legal basis of the LEP complaint (i.e., race, color, national origin, or LEP status);
  - c. Any names and contact information of persons, if known, whom the LEP Compliance Officer could contact for additional information to support or clarify the allegations; and
  - d. Corrective actions or remedies that the LEP complaint wishes to see provided.
- 4. The Cooperative shall make available an LEP Complaint form (attached as "Exhibit A") upon request to individuals seeking to file a LEP complaint based on the Cooperative's LEP program. This Complaint form outlines the specific information sought by the Cooperative in conducting any investigation into LEP Complaints, and shall be used by Cooperative employees in memorializing any verbal complaints based on the LEP Program.
- 5. Failure to utilize the Cooperative's LEP Complaint form will not prevent a complaint from being processed; however, the failure to provide the information outlined above will result in the LEP complaint being considered invalid, and returned to the complainant (if possible) for completion. The staff will <u>not</u> take any action until the minimum information is provided.
- 6. In all cases, the LEP Compliance Officer or his/her designee, shall respond to all valid and completed LEP Complaints received as outlined below:
  - a. With an initial assessment within ten (10) business days of receipt of a valid LEP complaint.
  - b. With the Cooperative's final assessment and proposed action, if any, within sixty (60) days of receipt of a valid LEP complaint.

#### C. Reporting

- 1. A log of all LEP Complaints received by the Cooperative and provided to the LEP Compliance Officer shall be maintained by the LEP Compliance Officer, or his/her designee, to serve as documentation of the nature of and final resolution of an LEP complaint.
- 2. No less than annually, the LEP Compliance Officer, or his/her designee, shall make a written report to the Office of the General Manager as to the effectiveness of the Cooperative's LEP program and the nature and resolution of all valid LEP complaints received since his/her last report.
- 3. By approving this policy, the Board is also approving the Cooperative's supporting LEP Plan.
- 4. The staff will review the Cooperative's LEP Plan no less than every two (2) years to determine if any additional action is needed or warranted and where such action is needed, the staff will advise the Board accordingly.

#### III. <u>RESPONSIBILITY</u>

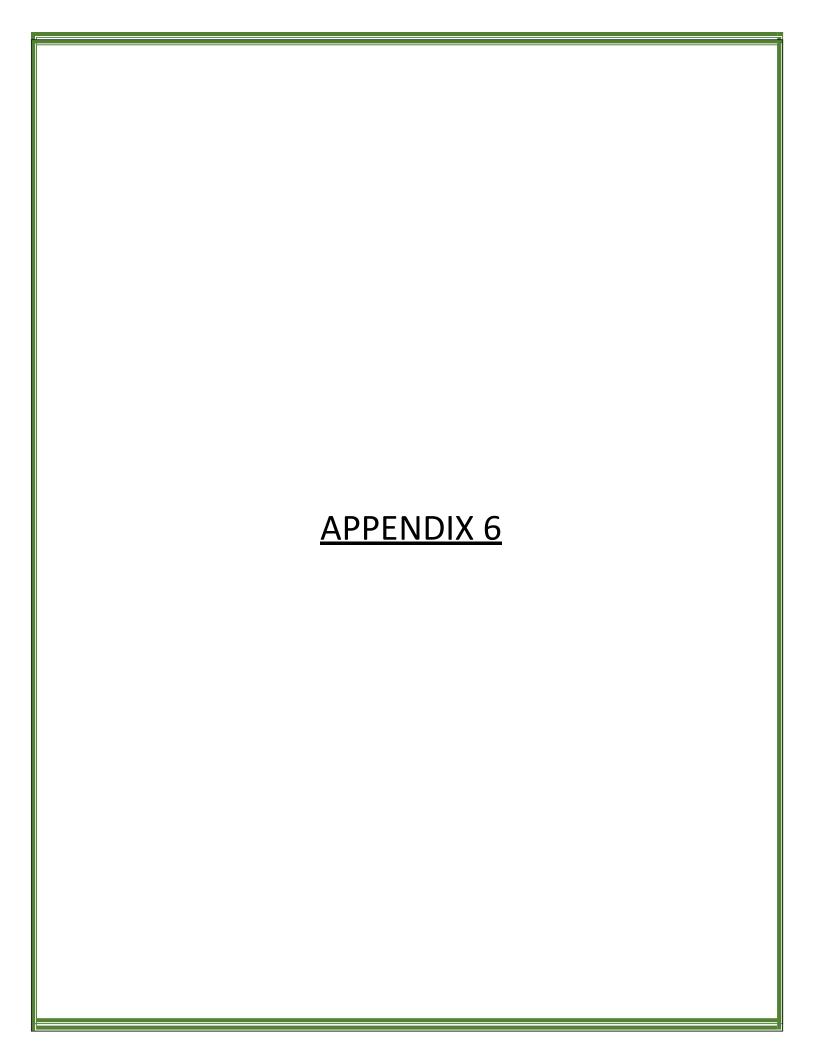
It shall be the responsibility of the General Manager to administer this policy, to develop appropriate controls for its overall enforcement and to report his/her findings to the Board of Trustees.

ADOPTED: 08/22/2017 EFFECTIVE: 08/22/2017

UPDATED 09/24/2019

#### NORTHFORK ELECTRIC COOPERATIVE, INC. LIMITED ENGLISH PROFICIENCY (LEP) COMPLAINT FORM (EXHIBIT "A")

Contact Information:	(Internal Use)
	Date Received://
Name	Method Received:
Address	Verbal Complaint? Y N
City State	Name of Employee Completing
Zip	Form on Behalf of Complainant:
Telephone:	
Email:	
Complaint:  Facts and circumstances surrounding the complaint, including the basis of the complaint (i.e., race, color, national origin, or LEP states.)	=
Any names of persons, if known, whom the Cooperative could c support or clarify the allegations, and contact information for the	
Corrective action or remedy requested:	
Sign the complaint in the space below. Attach any documents ye	
Complainant's Signature	Date
If the form is to be mailed, please send to the following address:	
Northfork Electric Cooperative, Inc. LEP Compliance Officer PO Box 400 Sayre, OK 73662	

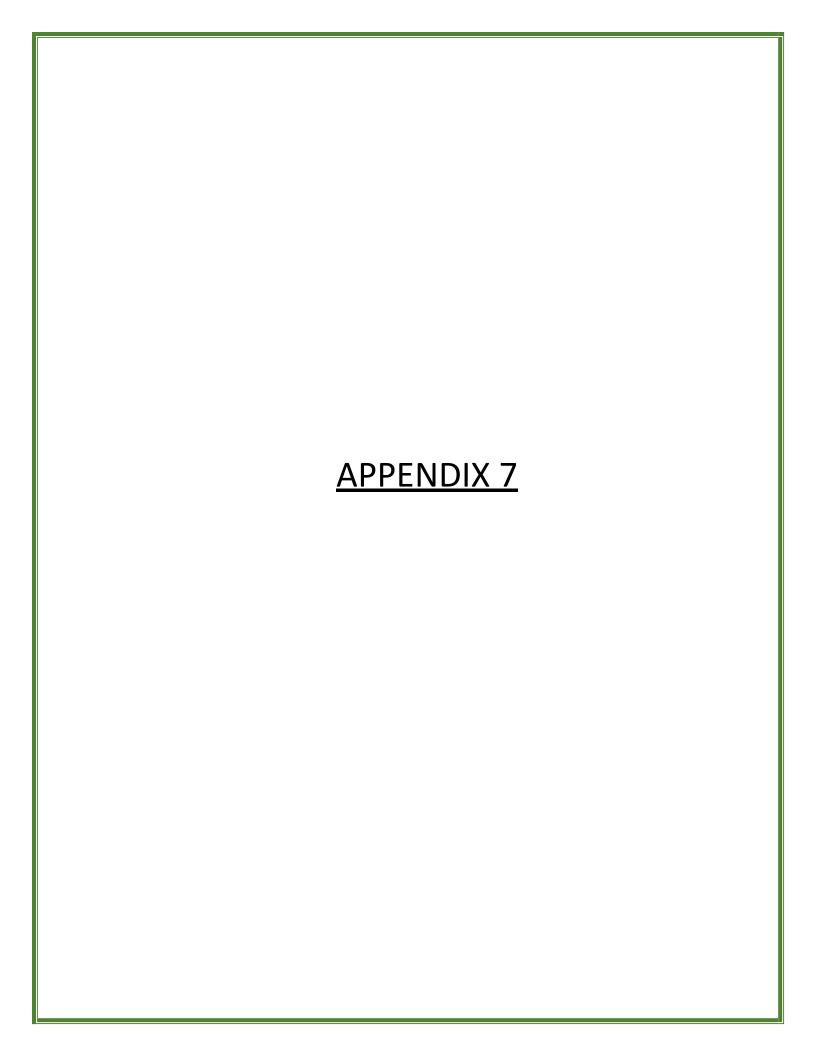


#### LANGUAGE IDENTIFICATION FLASHCARD

ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
Խողրում ենք նչում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք Հայերեն:	2. Armenian
যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাব্দে দাগ দিন।	3. Bengali
ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
如果你能读中文或讲中文,请选择此框。	6. Simplified Chinese
如果你能讀中文或講中文,請選擇此框。	7. Traditional Chinese
Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
Mark this box if you read or speak English.	11. English
اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi

Cocher ici si vous lisez ou parlez le français.	13. French
Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
Marchi questa casella se legge o parla italiano.	21. Italian
日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

Assinale este quadrado se você lê ou fala português.	26. Portuguese
Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
Marque esta casilla si lee o habla español.	31. Spanish
Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูคภาษาไทย.	33. Thai
Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
اگرآپ اردو پڑھتے یا بولتے ہیں تواس خانے میں نشان لگا کیں۔	36. Urdu
Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish



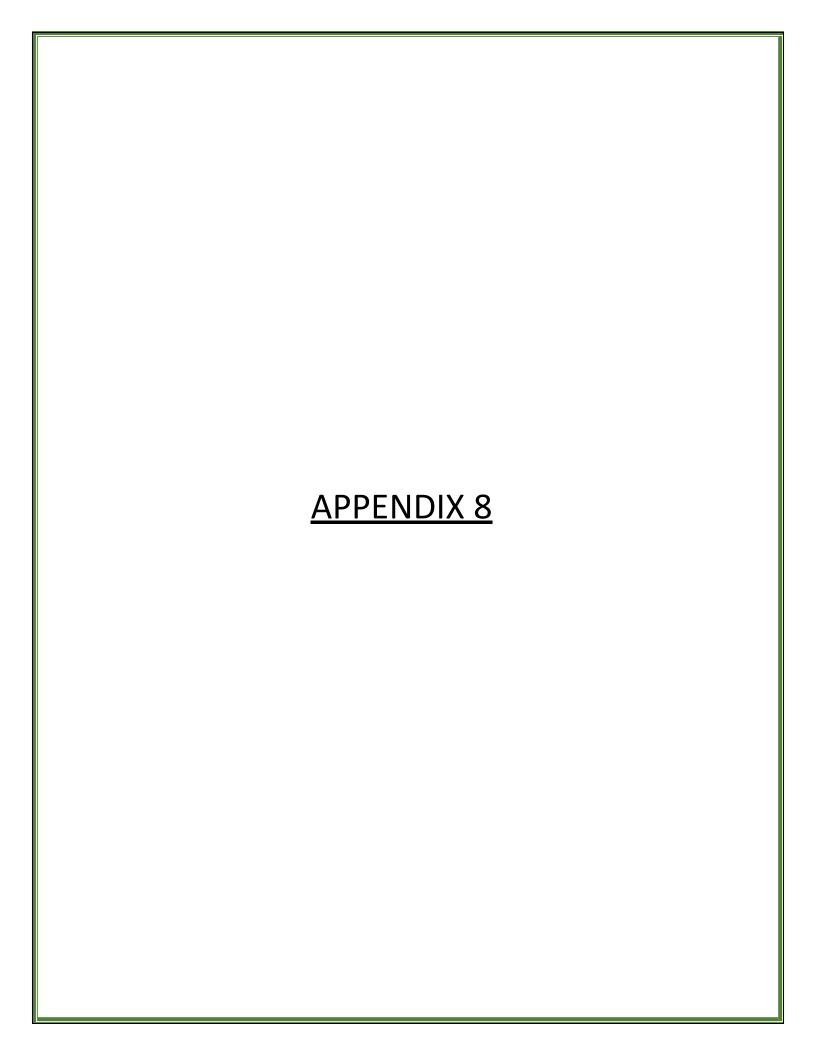
## LANGUAGE LINE SERVICE

#### **Quick REFERENCE Guide**

When receiving a call:

PRESS "Conference" – Using the conference feature provided on the telephone. This places the Non-English Speaker on hold.

- 1. DIAL 1 877 800 8604
- 2. You will be asked for the Customer Code. Customer Code is "ST".
- 3. Ask for the "House Account".
- 4. You will be asked for the Pass Code. Pass Code is "ST15".
- **5.** You will then need to provide the language you need and any other information regarding the call.
- **6.** An interpreter will be connected to the call.
- 7. Next PRESS "Conference" button on your phone. The Non-English Speaker will now also be connected to the call.



AUTORIZACIÓN DE GIRO BANCARIO					
Nombre del Banco, Ahorros y Préstamos, Cooperati	va de Crédito (I	Imprimir)	Número de	cuenta corrie	ente
Localización del Banco, Ciudad, Estado y Código Pos	stal				
He dado autoridad a <b>Northfork Elect</b>	<b>ric Coop</b> ., Inc. բ	oara sacar fondos de mi cuer	nta en el pago	de mis cuent	as.
Imprima su nombre según lo aceptado por El Banco	 )	Número de cuenta NFEC		 Número de	teléfono
Direccion de casa		Ciudad		Estado	Código postal
Firma aceptada por el Banco	Núm	ero de ruta bancaria		Fecha	

POR FAVOR COMPLETE Y REGRESE



PO Box 400 – Sayre, OK 73662

Teléfono: 580-928-3366 – Fax: 580-928-0348 – Sitio web: <u>www.nfecoop.com</u>

#### Solicitud de Membresía y Servicio Eléctrico

Fecha:				Número de cuenta:					
Tipo:	□ Individu	al □Conjunta □ N	egocio – Tipo	□ Otro					
Local	lización:	Sección	Municipio	Distancia	Condado				
Cuota	de socio	-	「arifa de conexión <u>\$</u>	Depósito\$	Total\$				
Nomb	re(s) del s	olicitante(s):							
Direco	ción de En	vio:							
Licenc	ia de con	ducir: Estado	Número						
Licenc	ia de con	ducir para cuenta co	onjunta: Estado	Número					
númei	ro de segı	ıro social / identific	ación:						
númei	ro de segı	ıro social / identific	ación para cuenta conjunt	a:					
Teléfo	no: Celula	nr / Casa / Trabajo_							
Correc	o electrón	ico:							
				ra la membresía y se compi os siguientes términos y con	romete a comprar energía eléctr idiciones.	ica de Northfork			
<ol> <li>2.</li> <li>3.</li> </ol>	descri El Soli Servio	tos anteriormente citante se compron	y pagará mensualmente la nete a cumplir y estar oblig a, en su forma enmendada	s facturas de la Cooperativa gado por los Artículos de Inc	rativa toda la energía eléctrica u por energía y servicios. corporación, Estatutos y Términc				
	a) b)	Esta solicitud, u servicio eléctric	ina vez aceptada por la Co o y obliga al Solicitante a p	pagar por electricidad a la C	oligatorio que obliga a la Cooper ooperativa; ódigos aplicables y los requisitos				
	c)	cooperativo y especificación; Los materiales y instalaciones eléctricas instalados serán y seguirán siendo propiedad de la Cooperativa y podrán ser							
	d)	retirados tras la rescisión de este acuerdo; A petición, si el Solicitante es el propietario de la propiedad, otorgarán el derecho de vía a servidumbres sobre, a través y/o bajo tierras propiedad de la construcción, operación, mantenimiento o reubicación de líneas eléctricas y instalaciones utilizadas para suministrar electricidad al Solicitante o otros miembros de la Cooperativa;							
	e) f)	El solicitante no permitirá que nadie se desconecte o interfiera con las líneas o instalaciones de la Cooperativa; Proporcionar un sitio aceptable a la Cooperativa para la conexión del medidor y permitir el acceso para la entrada y salida para mantener las líneas de instalaciones de servicio eléctrico;							
	g)	Permitir la limpieza del derecho de vía para cortar, recortar y tratar químicamente árboles y arbustos que puedan interferir o amenazar con poner en peligro las líneas, equipos o instalaciones de la Cooperativa;							
	h)	Una parte de la cantidad pagada por el servicio eléctrico cada año es por una suscripción a la revista OKLAHOMA LIVING (\$3.12), una publicación mensual de la Asociación de Cooperativas Eléctricas de Oklahoma y por una suscripción a SPARI & FLASHES, un boletín mensual de la Cooperativa, para los miembros de la Cooperativa.							
4.	La(s)   Solicit	persona(s) que firma esta Solicitud garantizan expresamente que tienen la autoridad para firmar por o en nombre del							
[X] Solicit	ante – Fir	me y Regrese		[X] Solicitante Cor	njunto – Firme y Regrese				

#### Northfork Electric Cooperative, Inc.

#### ACUERDO DE SERVICIO DE PAGO POR USO / TÉRMINOS Y CONDICIONES

Como cliente existente, entiendo que cuando mi cuenta se convierta en Pago-Por-Uso, se calculará el monto total adeudado a través de la medida actual del medidor. Esto proporcionará un saldo inicial y determinará un monto a pagar y el saldo de crédito mínimo requerido de \$ 25. Es posible llegar a un acuerdo sobre este monto en el que el 50% de todos los Pago-Por-Uso se aplicarían a este saldo hasta que se pague en su totalidad.

Como nuevo cliente, entiendo que los siguientes cargos deben pagarse antes de que se pueda conectar el servicio eléctrico: tarifa de membresía de \$ 50, tarifa de conexión / transferencia de \$ 25 y un mínimo de \$ 25 para crédito de Pago-Por-Uso = mínimo de \$ 100.

#### NO RECIBIRÉ UNA FACTURA O DECLARACIÓN MENSUAL

El servicio eléctrico de Pago-Por-Uso requiere que la cuenta tenga un crédito en todo momento. El servicio eléctrico se desconectará cada vez que la cuenta no tenga crédito. Las desconexiones se emiten diariamente y las condiciones médicas, las inclemencias del tiempo o las vacaciones no pospondrán la desconexión. Si se recibe un pago de devolución, el monto del artículo devuelto y una tarifa de artículo devuelto de \$ 25 se cargarán a la cuenta del consumidor de inmediato. Si esto hace que el crédito en la cuenta se agote, el servicio se desconectará sin ninguna notificación. Northfork Electric Cooperative tiene derecho a rechazar el pago mediante cheque si la cuenta tiene un artículo devuelto.

Entiendo que las cuentas de Pago-Por-Uso no son elegibles para arreglos de pago, facturación de presupuesto o giro bancario. Los pagos de asistencia energética se aplicarán cuando Northfork Electric haya recibido el pago. No se aceptarán compromisos de asistencia para mantener el servicio activo. Los miembros de Pago-Por-Uso entienden que las condiciones médicas y de salud de cualquier persona ubicada en la dirección donde se proporciona el servicio eléctrico no pospondrán la desconexión del servicio.

Los pagos se pueden hacer las 24 horas, los 7 días de la semana, por teléfono, la aplicación SmartHub o por Internet en <a href="https://www.nfecoop.com">www.nfecoop.com</a>. Los pagos también se pueden realizar en la oficina de Sayre durante el horario comercial habitual. Si el servicio se cancela debido a un saldo positivo en su cuenta, el servicio se volverá a conectar tan pronto como se pague el saldo pendiente, lo que da un saldo mínimo de un crédito de \$ 10. No se cobrarán cargos por desconexión, reconexión o retraso en su cuenta.

Si el servicio eléctrico se termina a solicitud del miembro, o la cuenta se desconectó por falta de pago y permanece desconectada durante 10 días o más, la cuenta se liquidará y se facturará al final. Las cuentas recibirán un reembolso por cualquier crédito restante en la cuenta junto con un reembolso de la tarifa de membresía, si corresponde. Si todavía se debe un saldo en este momento, se enviará una factura final a la última dirección conocida y se espera que el pago de inmediato evite que la cuenta sea reportada a una agencia de cobro de crédito. Pago-Por-Uso de ninguna manera libera la responsabilidad del miembro de pagar el saldo final adeudado.

Entiendo que en cualquier momento puedo elegir convertir mi cuenta a facturación estándar. Northfork Electric Cooperative puede requerir un depósito como condición para un servicio continuo.

Entiendo estos términos y condiciones, así como la diferencia entre la facturación estándar y el Pago-Por-Uso. Solicito establecer una cuenta eléctrica de Pago-Por-Uso de Northfork Electric Cooperative. Entiendo que es mi responsabilidad mantener un saldo de crédito para continuar con el servicio. El uso diario y las cantidades se pueden verificar contactando a Northfork Electric por teléfono, la aplicación SmartHub o por Internet en www.nfecoop.com.

teléfono, la aplicación SmartHub o por Internet en	www.nfecoop.com	<u>n</u> .	•
Solicito que mi cuenta sea Pago-Por-Uso.	Fecha:	Cuenta #	
Doy permiso a Northfork Electric Cooperative para notificaciones de Pago-Por-Uso. Entiendo que es r cambio en mi información de contacto.	•		•