

Podcasts | March 9, 2023

Lost in Translation: Why Non-English Speakers Can Struggle at Banks

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Chris Willis

Chris Willis, co-leader of Troutman Pepper's Consumer Financial Services Regulatory Practice Group, was interviewed on the March 9, 2023 episode of *American Banker's Bankshot* podcast episode, "[Lost in Translation: Why Non-English Speakers Can Struggle at Banks](#)."

Chris Willis, a lawyer at the firm Troutman Pepper, says that means banks set up multiple lines of defense for any product they roll out. There's the customer-facing team — which sells products and interacts with customers. But there's also a compliance team to make sure the bank isn't breaking any rules — either in the customer interactions, in training material or written disclosures.

And on top of that, there's the audit team — which makes sure that everyone did their job right.

WILLIS: That's behind the scenes, and a lot of people don't see that. But it's done for the purpose of regulatory compliance, and at the insistence of the banks' regulators. And so they can't just casually launch things like that. It takes a lot of personnel and training and thought before you can roll something like that out.

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Willis says regulators are doing more to address these concerns — including by putting out model translated forms that the industry can use. But it's taken years for these efforts to get going.

WILLIS: If there's not a model form in another language, then the bank is at much greater peril of trying to guess what the right words are, and then wondering whether that will be acceptable to the regulator or will be understood by consumers later.

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Willis, one of the lawyers we heard from earlier, says there's been a slight shift in the agency's tone under Chopra. Before, the CFPB was looking to clear up hurdles or uncertainties and encourage banks to offer multilingual services. And now the tone seems to be moving a bit away from encouragement and more toward making language access an expectation.

To help banks with the process, the agency has created [model forms in Spanish](#) for lenders to use. That includes new documents for prepaid card disclosures and information for those who have been denied for a loan. The plan

is to translate more disclosures in Spanish and other languages as well.

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