

METRO NASHVILLE LANGUAGE ACCESS GUIDE & TOOLKIT

ADA & TITLE VI RESOURCES



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METRO LANGUAGE ACCESS STATEMENT

The purpose of this document is to establish guidelines for Metro Nashville personnel to ensure equitable services to and effective communication with individuals identified as linguistic minorities - those whose primary language is not English, and who have limited or no ability to speak, read, write, or understand English. This includes communities traditionally identified as Limited English Proficient (LEP) and the Deaf or hard of hearing. This policy is in accordance with Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, Executive Order 13166, and the Americans with Disabilities Act of 1990. Following these guidelines is essential to ensuring that all people in Nashville and Davidson County receive meaningful access to Metro programs, benefits, and services.

METRO ADA POLICY STATEMENT

It is both the policy and responsibility of the Metropolitan Government of Nashville and Davidson County to ensure that its programs, services, and activities are accessible, and that practical use by all people, regardless of whether they are residents or visitors, is not restricted or hindered in violation of standards relating to individuals with disabilities.

METRO ACCESSIBLE PUBLIC COMMUNICATION POLICY

It is the policy of the Metropolitan Government of Nashville and Davidson County to ensure that program, service, and activity communications with participants and members of the public with disabilities are as effective as communications with others. Toward that end, Metropolitan Government will furnish appropriate auxiliary aids and services as necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, any Metro program, service, or activity.

These policies are carried out by Metro's ADA & Safety Services, whose mission is to ensure that all programs, services, and activities of the Metropolitan Government of Nashville and Davidson County are accessible, and that practical use by individuals with disabilities, regardless of whether they are residents or visitors, is not restricted or hindered in violation of standards relating to individuals with disabilities.

TERMINOLOGY AND KEY PHRASES

AMERICAN DISABILITIES ACT OF 1990 (ADA)

The Americans with Disabilities Act became effective July 26, 1990. This significant legislation extends civil rights protections to an estimated 49 million Americans with disabilities. The ADA makes it illegal to discriminate on the basis of disability in the areas of employment, public service, public accommodation, transportation, and telecommunication.

AUXILIARY AIDS AND SERVICES

Devices or services that enable effective communication for people with disabilities.

DEAF

Capital “D” Deaf refers to individuals and communities that identify with Deaf culture and American Sign Language. Lower case “d” deaf refers to the condition of hearing loss.

DISABILITY

With respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities. This includes those with a record of such an impairment and those regarded as having an impairment.

EFFECTIVE COMMUNICATION

Under Title II of the ADA, all state and local governments are required to take steps to ensure that their communications with people with disabilities are as effective as communications with others. “Effective communication” means that whatever is written or spoken must be as clear and understandable to people with disabilities as it is for people who do not have disabilities. The effective communication requirement applies to all members of the public with disabilities, including job applicants, program participants, and even people who simply contact a Metro agency seeking information about programs, services, or activities.

INTERPRETER

An individual who converts information from one spoken language to another spoken or sign language. Metro Vendors, employees who have successfully passed an Interpreter Skills Assessment (ISA), or have a current professional interpreter certification are considered qualified to provide interpreting services. Bilingual employees may not necessarily have the linguistic skills or training to provide interpretation for highly technical sessions (i.e., legal, medical).

LIMITED ENGLISH PROFICIENT (LEP) INDIVIDUALS

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communications (e.g., speaking or understanding), but still LEP for other purposes (e.g., reading or writing).

LINGUISTIC MINORITIES

Individuals or communities who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English. This includes those traditionally considered Limited English Proficient (LEP) or who are Deaf and/or hard of hearing.

MEANINGFUL ACCESS

Language assistance that results in accurate, timely, and effective communication with the LEP individuals. Meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

RELAY SERVICE

7-1-1 Relay Service allows people with hearing or speech disabilities who use text telephones or teletypewriters (TTYs) to have telephone conversations with people who do not have TTYs. Dialing **7-1-1** works whether or not the person placing the call is using a TTY since communications assistants use voice and TTY. The confidential service is available 24 hours a day, 7 days a week, and local calls are free of charge, however long distance toll charges may apply. Internet Protocol or **IP Relay Service** offers a communication alternative for people with hearing or speech disabilities who have an Internet connection. Local and long distance communications by IP Relay Service are free of charge. The service can be accessed at <https://www.sprintrelay.com/services/sprint-ip-relay>

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d Metro Ordinance BL2004-352 requires all departments, boards and commissions to develop an implementation plan pursuant to Title VI and requires annual compliance reports by such departments, boards and commissions. Title VI applies to Metro functions, facilities, operations, programs and projects that receive federal funding as well as to services provided by subrecipients that receive federal financial assistance through contracts or grants from Metro.

TRANSLATOR

An individual who converts written documents from one language to another.

VITAL DOCUMENTS

A document will be considered vital if it contains information that is critical for obtaining services and/or benefits or is required by law. Vital documents include, for example: applications; consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rulebooks; written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client.

LANGUAGE & ETIQUETTE

APPROPRIATE LANGUAGE

Using appropriate language when speaking or referring to individuals avoids perpetuating negative stereotypes and perceptions. This is especially true for people with disabilities. While language is constantly evolving, we offer some phrases and terms that are generally considered appropriate. Best practice is to put the individual before the disability, describing what a person has, not who the person is. Some examples are included below. When in doubt about what terminology to use, it is ok to ask.

- Rather than handicapped accessible, instead use *accessible parking/accommodations*
- Rather than handicapped or crippled, instead use *individual with a physical disability*
- Rather than saying someone has a problem with..., instead say *they need... or they use...*

USING AN INTERPRETER

A trained interpreter can assist in effective communication, reduce liabilities, and increase constituent satisfaction. Some standard practices when using an interpreter:

- Brief the interpreter prior to a conversation so the interpreter can not only provide the appropriate tone for the conversation but can also inform you if the session will be beyond their scope (i.e., too medical, too legal, “I’m not familiar with Guatemalan Spanish”, etc.)
- Allow the interpreter to introduce themselves as the interpreter before starting the conversation. This allows the interpreter to set the ground rules (i.e., “I will interpret everything you say, and everything spoken in this session will be confidential”, etc.)
- A professional and trained interpreter will interpret in the first person, not third person. Please speak directly to the constituent as if you were both speaking the same language.
- Speak clearly and in a normal tone. Remember to pause between sentences or complete thoughts.
- Refrain from using metaphors, acronyms, slang, or idioms.
- A trained interpreter will not alter the conversation and will not assume answers to questions that are asked; however, an interpreter may interject if necessary, to explain any potential cultural or linguistic misunderstandings.
- Allow only one person to speak at a time.

CODE OF ETHICS FOR INTERPRETERS

- While Legal/Court interpreters and Healthcare/Medical interpreters have their own set of standards of practice and codes of ethics, they are very similar to the Code of Ethics for Community Interpreters. Community interpreting is defined as interpreting that facilitates access to community services.
 - Code of Ethics for the Community Interpreter
 - i. Confidentiality
 - ii. Accuracy

- iii. Impartiality
- iv. Transparency
- v. Direct Communication
- vi. Professional Boundaries
- vii. Intercultural Communication
- viii. Professional Conduct

Review the Code of Ethics or any other expectations with your in-house interpreters. Having a cohesive plan and a list of expectations from the start, will create a uniform way of providing interpretation services. Your customers will know what to expect. Your interpreters will know what to expect.

OTHER THINGS TO REMEMBER

- American Sign Language (ASL) is a complete, unique language that uses a combination of hand motions, body gestures, and facial expressions. Being its own language, it not only has its own vocabulary, but also its own grammar that differs from English.
- When communicating with people with intellectual disabilities, presume competence.
- Don't assume someone needs assistance. Offer your help before providing it.
- Whenever possible, sit at eye level with someone with a physical disability.
- Guide a person with a visual disability by offering use of your arm and walking normally.

COORDINATOR EXPECTATIONS

Each Metro department should identify an ADA Coordinator. Every department that receives federal financial assistance should also identify a Title VI Coordinator. These can be the same person. The Coordinator(s) are responsible for:

- Acting as the department's liaison to other Metro agencies and the public concerning ADA matters and requests for accommodations.
- Conducting an ANNUAL DEPARTMENT ASSESSMENT related to accessibility to services, programs, and information.
- Overseeing their department's compliance with ADA and Title VI and relevant GRIEVANCE PROCEDURES.
- Ensuring basic STAFF TRAINING and access to necessary resources and tools.
- Attending the annual ADA and Title VI Trainings.
- Assisting in the development of inter-departmental policies and STANDARD OPERATING PROCEDURES to improve and sustain equitable access to department services.
- Producing the annual Title VI REPORT.

POLICIES AND PRACTICES

These policies and practices should be universal standards for all Metro departments. In order to best serve the needs of linguistic minorities, it is necessary to have in place the practices and guidelines that ensure effective and meaningful access to information, resources, programs, and other services. The best practices are detailed below:

ANNUAL ASSESSMENT & DATA COLLECTION

- Annual Assessment
 - All departments should conduct an annual review of current language access policies, language needs and the populations that they serve.
 - Departments should also assess changes in demographics, types of services or other needs that may require reevaluation of policy and procedure using internal and/or external data sources (e.g. intake forms, Census data, etc.).
 - Assessments will be used for the creation and annual update of a department language access plan, outlining how services are to be delivered, by whom, and how these will be tracked.
 - A self-assessment instrument is included in the “Tools & Resources” section of this packet.
- Data Collection
 - Departments should collect information on, but not limited to: primary language of constituents, use and language of interpretation services, distribution of translated documents (if applicable), frequency of contact with linguistic minorities seeking services.
 - Departments without existing data collection infrastructures should develop effective methods of gathering relevant information about linguistic minorities and other groups requiring additional communication support. MHRC can provide technical assistance.

STANDARD OPERATING PROCEDURES (SOPs)

- Departments should have written SOPs to provide language assistance services.
- Departmental SOPs must, at a minimum, include the following:
 - Instructions for staff on how to access language assistance services when responding to constituents in person, on the phone, and in writing.
 - Adopted procedures should meet legal obligations and match departmental needs.
 - Language assistance can be provided in a variety of ways including multilingual staff, in-person interpreters, telephone interpreters, sign language interpretation, and written translation.

- Internal interpreters (those that are not contracted out) should take the Interpreter Skills Assessment (ISA). Multilingual staff who are not fulltime interpreters for the department may assist with interpretation. However, they should take a Language Proficiency Assessment (LPA). These assessments can be arranged through one of Metro’s Language Access Vendors.
- Staff cannot rely on an accompanying adult of an individual who is Deaf or hard of hearing to interpret except in emergency situations where there is an imminent threat to the safety or welfare of the individual or the public, and no interpreter is available, OR when the individual requests the accompanying adult interpret, the accompanying adult agrees, and it is appropriate under the circumstances.
- Staff cannot rely on a minor to interpret except in an emergency involving an imminent threat to the safety or welfare of an individual or the public and where no interpreter is available.
- Apps can be helpful in certain circumstances; however, they are unreliable and should not be used during medical, legal, or otherwise sensitive sessions where a misunderstanding could lead to serious consequences.
- Auxiliary aids must be provided free of charge to individuals with a disability.
- In determining what type of auxiliary aid or service is necessary, SOPs must give primary consideration to the requests of the individual with disabilities. Other considerations include whether another effective means of communication is available, means of communication would result in a fundamental alteration in the service, program, or activity; means of communication would result in undue financial burden on taxpayers. As necessary, the department ADA Coordinator will confer with the requesting party to identify how effective communication can be achieved in the context of the subject program, service or activity, and may ask for technical assistance and information on how to obtain a particular auxiliary aid or service.
- Instructions for staff on how to collect data related to language assistance services requested and provided.
- A method for identifying vital documents and translating them in the most frequently encountered languages.
- Policies that ensure new staff are aware of the procedures and properly trained.

- Policies that ensure procedures for requesting and accessing language assistance are communicated to constituents.
 - Constituents should be made aware of their right to request free language assistance, by way of staff and notices placed in visible locations, such as intake areas and other points of entry. (Note: sample signs are included in the Appendix of this guide)
- If a department chooses to provide interpreters via video remote interpreting (VRI) services, SOPs should ensure that the following is provided:
 - Real-time, full motion video and audio over a high-speed, wide-bandwidth connection or wireless connection that delivers high-quality video images;
 - A sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers;
 - A clear audible transmission of voices; and
 - Adequate training to users of the technology.
- All departments are encouraged to set up accounts with current Metro vendors offering language assistance services. Contact information for these vendors is included in the Appendix of this guide.

STAFF TRAINING

- All new and existing staff should be trained in their department's language access policies and procedures.
- Public-facing staff should be trained in effective communication techniques, including how to conduct an initial assessment to determine a constituent's language needs, and how to work with interpreters (both in-person and over the phone).
- Bilingual staff and in-house interpreters should be given an interpreter assessment, provided by a Metro vendor to assess competency.

GRIEVANCE PROCEDURE

- A complaint regarding the inadequate provision of language assistance may be made in person, over the phone, or in writing to the department in question, the Metro Human Relations Commission, or the ADA Coordinator for Metro. Departments may have their own grievance form and process, or may advise constituents to file their complaint with the Metro Human Relations Commission.

REPORTING

- The department assessment will be included as part of annual Title VI reporting (due to Human Resources in May), along with a language access plan detailing how departments will meet language access goals.

ADA ACCOMMODATIONS

REQUESTING AN ADA ACCOMMODATION

A request for accommodation must:

- be submitted in writing to the Metro Agency ADA Coordinator of the department or agency responsible for the location of the program, service, activity or facility. Requests may also be submitted to the Metropolitan Government of Nashville and Davidson County ADA Coordinator at Jerry.Hall@nashville.gov;
- detail the name, address, and telephone number of the requesting party;
- specify the location of the program, service, activity or facility where accommodation is requested; and
- describe why accommodation is needed.

A completed ADA Accommodation Request Form may be used to make a request. If an alternative means of filing a request is necessary, contact the ADA Compliance Division at: contactada@nashville.gov or call: 615-862-8744.

A requesting party should receive a response within 15 calendar days after a request is received by the ADA Coordinator. If the response by the ADA department coordinator does not satisfactorily resolve the issue, the individual making the request may file a formal grievance.

REQUESTING ACCESSIBLE PUBLIC COMMUNICATION (AUXILIARY AID/SERVICE)

Auxiliary aids or services are sometimes necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, any Metro program, service, or activity. Accessible public communication (auxiliary aid/service) requests must be made:

- in advance to enable time to fulfill the request (while Metro will make good faith efforts to fulfill all accommodation requests, those relating to public meetings and hearings should be submitted at least one week in advance, and those relating to on-going services and programs should be submitted at least 48 hours in advance); and
- to the Metro Agency ADA Coordinator of the department or agency responsible for the program or service in advance of the meeting, hearing, service. Requests may also be submitted to the Metropolitan Government of Nashville and Davidson County ADA Coordinator at Jerry.Hall@nashville.gov.

In determining what type of auxiliary aid or service is necessary, Metro will give primary consideration to the requests of the individual with disabilities (other considerations include whether another effective means of communication is available, means of communication would result in a fundamental alteration in the service, program, or activity; means of communication would result in undue financial burden on taxpayers). As necessary, the responsible agency ADA Coordinator will confer with the requesting party to identify how effective communication can be achieved in the context of the subject program, service or activity, and may ask for technical assistance and information on how to obtain a particular auxiliary aid or service.

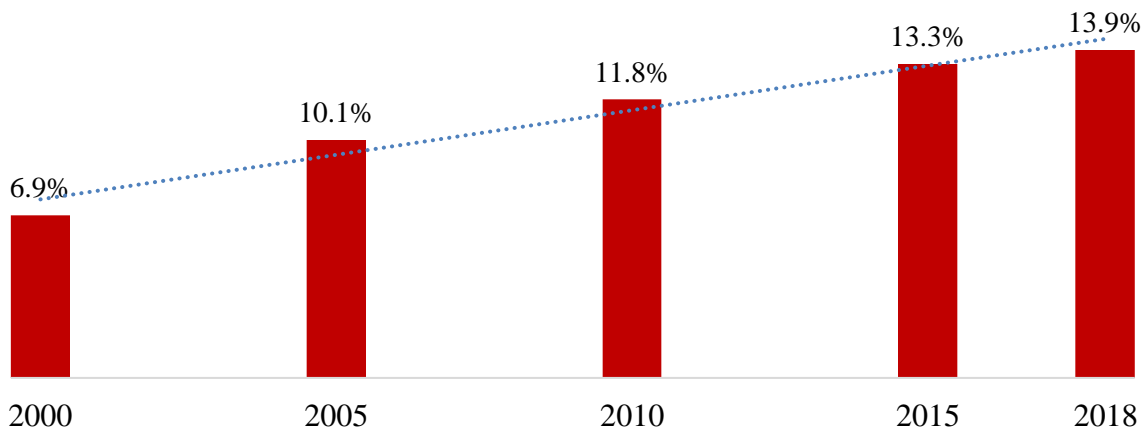
A CLOSER LOOK: METRO NASHVILLE DEMOGRAPHICS

If your agency does not currently collect language information from your constituents, it might be useful to take a wider look at the distribution of Nashville.

FOREIGN-BORN NASHVILLIANS

The share of the foreign-born population in Davidson County has nearly doubled in the past 15 years. While those born outside of the U.S. made up 6.9 percent of the population in 2000, estimates for 2018 put them at 13.9 percent.

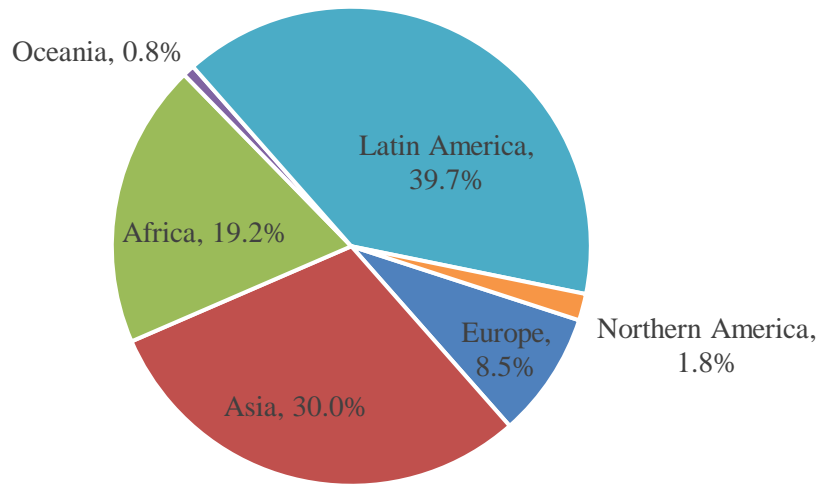
Figure 1. Foreign-born Population in Davidson County,
2000-2018



Source: US Census, American Community Survey, 2018, 1-year estimates

Individuals come from all over the world to live in Nashville. The greatest share of the foreign-born population come from Latin America (44.2%), followed by those from Asia (30.4%) and Africa (15.3%).

Figure 2. Region of Origin for Foreign-born Population, Davidson County 2018

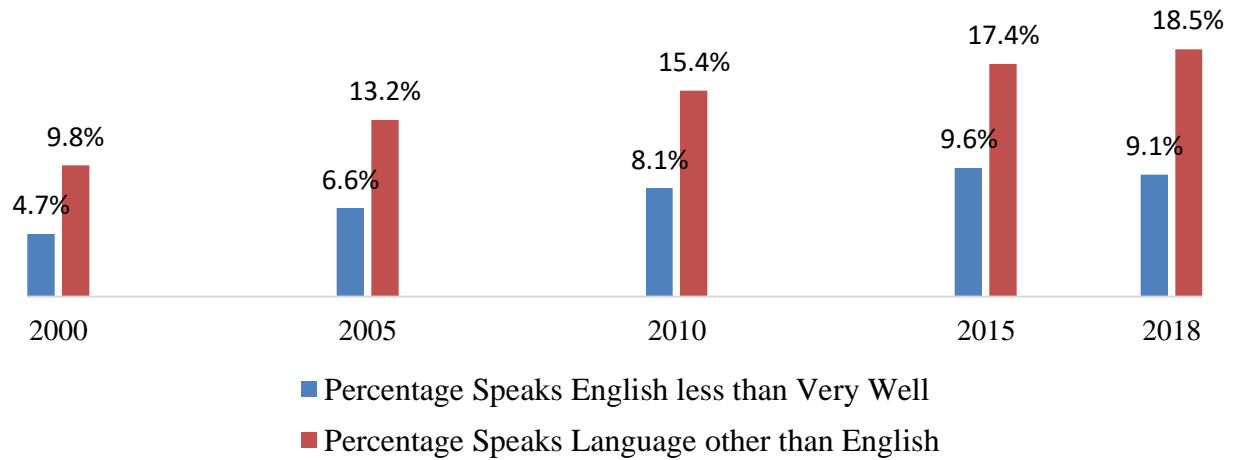


Source: US Census, American Community Survey, 2018, 1-year estimates

NON-ENGLISH LANGUAGES

Along with increases in the foreign-born population, Nashville has also seen growth in the share of people who speak a language other than English and among those who speak English “less than very well.” While in 2000, just under 10 percent of Nashvillians ages 5 and older spoke a language other than English, this grew to 18.5 percent in 2018. Similarly, just 4.7 percent of the Nashville population age 5 and older reported speaking English “less than very well” in 2000, but this figure more than doubled in 2015 to 9.1 percent.

Figure 3. Changes in Percent of Population Age 5 and over that Speaks a Language other than English and that Speaks English "less than Very Well"



Source: US Census, American Community Survey, 2018, 1-year estimates

2019

Speaks English less than Very Well 9.3%

Speaks Language other than English 18.0%

A study by the Metro Human Relations Commission ("Metro Language Access Study") surveyed Metro departments and local organizations about the linguistic minority communities with whom they typically interact. The most common non-English languages reported in the study are:

- Spanish
- Arabic
- Kurdish
- Burmese
- Somali
- Vietnamese
- Nepali

INDIVIDUALS WITH DISABILITIES

A little over 12 percent of Davidson County residents reported having a disability in the 2015 American Community Survey. The table below outlines the various types of disabilities captured by this figure:

Percent with:

| | |
|----------------------------------|------|
| a hearing difficulty | 3.0% |
| a vision difficulty | 3.0% |
| a cognitive difficulty | 5.0% |
| an ambulatory difficulty | 7.0% |
| a self-care difficulty | 2.6% |
| an independent living difficulty | 4.6% |

| DISABILITY TYPE BY DETAILED AGE | Total | With a Disability | Percent with a Disability |
|---------------------------------|--------|-------------------|---------------------------|
| With a hearing difficulty | (X) | 17887 | 2.6 |
| Population under 18 years | 142773 | 589 | 0.4 |
| Population under 5 years | 46059 | 371 | 0.8 |
| Population 5 to 17 years | 96714 | 218 | 0.2 |
| Population 18 to 64 years | 458967 | 7827 | 1.7 |
| Population 18 to 34 years | 207974 | 1240 | 0.6 |
| Population 35 to 64 years | 250993 | 6587 | 2.6 |
| Population 65 years and over | 85524 | 9471 | 11.1 |
| Population 65 to 74 years | 53170 | 3668 | 6.9 |
| Population 75 years and over | 32354 | 5803 | 17.9 |
| With a vision difficulty | (X) | 16875 | 2.5 |
| Population under 18 years | 142773 | 1302 | 0.9 |
| Population under 5 years | 46059 | 485 | 1.1 |
| Population 5 to 17 years | 96714 | 817 | 0.8 |
| Population 18 to 64 years | 458967 | 9322 | 2 |
| Population 18 to 34 years | 207974 | 1709 | 0.8 |
| Population 35 to 64 years | 250993 | 7613 | 3 |
| Population 65 years and over | 85524 | 6251 | 7.3 |
| Population 65 to 74 years | 53170 | 2717 | 5.1 |
| Population 75 years and over | 32354 | 3534 | 10.9 |
| With a cognitive difficulty | (X) | 29634 | 4.6 |
| Population under 18 years | 96714 | 4583 | 4.7 |
| Population 18 to 64 years | 458967 | 17748 | 3.9 |

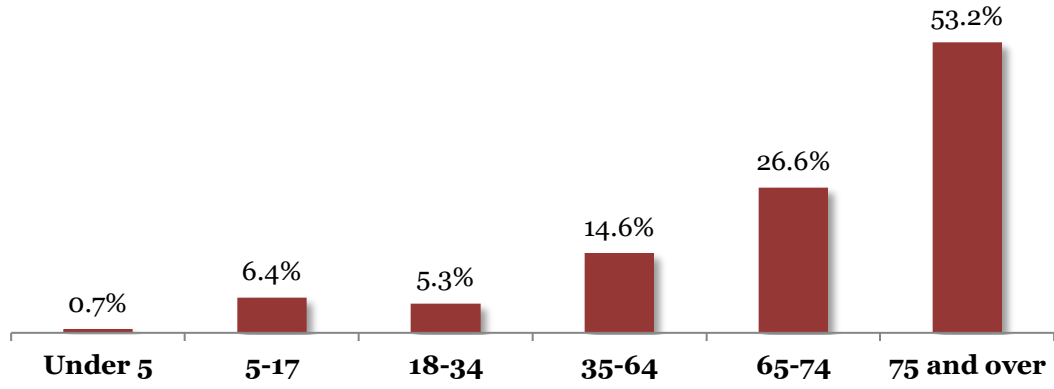
| | | | |
|---------------------------------------|--------|-------|------|
| Population 18 to 34 years | 207974 | 5161 | 2.5 |
| Population 35 to 64 years | 250993 | 12587 | 5 |
| Population 65 years and over | 85524 | 7303 | 8.5 |
| Population 65 to 74 years | 53170 | 3177 | 6 |
| Population 75 years and over | 32354 | 4126 | 12.8 |
| With an ambulatory difficulty | (X) | 35463 | 5.5 |
| Population under 18 years | 96714 | 285 | 0.3 |
| Population 18 to 64 years | 458967 | 17189 | 3.7 |
| Population 18 to 34 years | 207974 | 1180 | 0.6 |
| Population 35 to 64 years | 250993 | 16009 | 6.4 |
| Population 65 years and over | 85524 | 17989 | 21 |
| Population 65 to 74 years | 53170 | 8787 | 16.5 |
| Population 75 years and over | 32354 | 9202 | 28.4 |
| With a self-care difficulty | (X) | 10816 | 1.7 |
| Population under 18 years | 96714 | 340 | 0.4 |
| Population 18 to 64 years | 458967 | 4998 | 1.1 |
| Population 18 to 34 years | 207974 | 355 | 0.2 |
| Population 35 to 64 years | 250993 | 4643 | 1.8 |
| Population 65 years and over | 85524 | 5478 | 6.4 |
| Population 65 to 74 years | 53170 | 2587 | 4.9 |
| Population 75 years and over | 32354 | 2891 | 8.9 |
| With an independent living difficulty | (X) | 22491 | 4.1 |
| Population 18 to 64 years | 458967 | 10784 | 2.3 |
| Population 18 to 34 years | 207974 | 3140 | 1.5 |
| Population 35 to 64 years | 250993 | 7644 | 3 |
| Population 65 years and over | 85524 | 11707 | 13.7 |
| Population 65 to 74 years | 53170 | 4698 | 8.8 |
| Population 75 years and over | 32354 | 7009 | 21.7 |

While hearing, vision, and cognitive disabilities are self-explanatory, three other types of disabilities are less intuitive. Someone with an ambulatory difficulty has serious difficulty walking or climbing stairs, while an individual with self-care difficulty experiences hardship in bathing or dressing. The last category includes individuals with independent living difficulty that, because of a physical, mental, or emotional condition lasting 6 months or more, experiences significant hardship running errands alone, such as shopping or visit a doctor's office.

Disability largely affects Nashville's older population. Figure 4 below shows the distribution of disability by age category. Over half of individuals with disabilities (53.2 percent) are age 75 or older, while 26.6 percent are 65-74 years of age. Younger ages represent smaller shares of those with disabilities. Nearly 15 percent of those with disabilities were between the ages of 35-64, a

little over 5 percent of these individuals were 18-34 years of age, and 6.4 percent were between 5-17. A small share, 0.7 percent, was under the age of 5.

FIGURE 4. PERCENT WITH DISABILITY BY AGE IN DAVIDSON COUNTY, 2015



Source: 2015 American Community Survey, 5-Year Estimates

TOOLS & RESOURCES

METRO DEPARTMENT LANGUAGE ACCESS ASSESSMENT

Understanding How Linguistic Minorities Interact With Your Agency

- | | | |
|--|---|--|
| 1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with linguistic minorities? | Yes | No |
| 2. Please describe the manner in which your agency interacts with linguistic minorities: | In-Person Telephonically Electronically (e.g. email or website) | Via Correspondence Other: (please specify) _____ |
| 3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other organizations.) | Yes | No |
| 4. If your agency does provide federal financial assistance to non-federal entities: | Yes | No |
| a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards? | Yes | No |
| b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services? | Yes | No |
| c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access? | Yes | No |

Identification and Assessment of LEP Communities

- | | | |
|--|---|--|
| 6. How does your agency identify linguistic minorities? (Select all that apply) | <input type="checkbox"/> Assume limited English proficiency if communication seems impaired <input type="checkbox"/> Respond to individual requests for language assistance services <input type="checkbox"/> Self-identification by the non-English speaker <input type="checkbox"/> Ask open-ended questions to determine language proficiency on the telephone or in person | <input type="checkbox"/> Use of "I Speak" language identification cards or posters <input type="checkbox"/> Based on written material submitted to the agency (e.g. complaints) <input type="checkbox"/> We have not identified linguistic minorities <input type="checkbox"/> Other (Please specify): _____ |
| 7. Does your program have a process to collect data on: | | |
| a. The number of linguistic minorities that you serve? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. The number of linguistic minorities in your service area? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. The number and prevalence of languages spoken by linguistic minorities in your service area? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 8. How often does your agency assess the language data for your service area? | <input type="checkbox"/> Annually <input type="checkbox"/> Biennially | <input type="checkbox"/> Not Sure <input type="checkbox"/> Other: _____ |
| 9. What data does your agency use to determine the linguistic minority communities in your service area? (Select all that apply) | <input type="checkbox"/> Census <input type="checkbox"/> US Dept. of Education <input type="checkbox"/> US Dept. of Labor <input type="checkbox"/> State Agencies | <input type="checkbox"/> Community Organizations <input type="checkbox"/> Intake information <input type="checkbox"/> Other: _____ |
| 10. Do you collect and record primary language data from individuals when they first contact your programs and activities? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

- 11. If you collect and record primary language data, where is the information stored?
- 12. What is the total number of linguistic minorities who use or receive services from your program each year?
- 13. How many linguistic minorities attempt to access your programs or services each month?
- 14. How many linguistic minorities use your programs or services each month?

| | | |
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| 15. Specify the top five most frequently encountered non-English languages (including American Sign Language) by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly). | Language 1. 2. 3. 4. 5. | Frequency of Encounters 1. 2. 3. 4. 5. |
|--|--|---|

Providing Language Assistance Services

| | | |
|---|--|---|
| 16. Does your agency currently have a system in place for tracking the type of language assistance services it provides to linguistic minorities at each interaction? | Yes | No |
| 17. What data, if any, do you maintain regarding language assistance services? (Select all that apply) | <ul style="list-style-type: none"> Primary language of persons encountered or served Use of language assistance services such as interpreters and translators Funds or staff time spent on language assistance services | <ul style="list-style-type: none"> Number of bilingual staff Cost of interpreter services Cost of translation of materials into non-English languages Other (Please specify): _____ |
| 18. Does your agency have a system to track the cost of language assistance services? | Yes | No |

| | | |
|--|--|---|
| 19. What types of language assistance services does your agency provide? (Select all that apply) | Bilingual staff In-house interpreters (oral) In-house translators (documents) Contracted interpreters Contracted Translators Telephone interpretation services Video interpretation services | Language bank or dedicated pool of interpreters or translators Volunteer interpreters or translators Interpreters or translators borrowed from another agency Other (Please specify): <hr/> |
| 20. Does your agency have a certification or assessment process that staff must complete before serving as interpreters or translators for linguistic minorities? | Yes | No |
| a) Does the process include use of standardized language proficiency exams? | Yes | No |
| 21. Does your agency ask or allow linguistic minorities to provide their own interpreters or have family members or friends interpret? | Yes | No |
| 22. Does your agency have contracts with language assistance service providers (in-person interpreters, telephone interpreters, video interpreters, or translators)? | Yes | No |
| 23. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters? | Yes | No |
| 24. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area? | Yes | No |
| 25. Which vital written documents has your agency translated into non-English languages? | Consent forms Complaint forms Intake forms Notices of rights Notice of denial, loss or decrease in benefits or services Notice of disciplinary action | Applications to participate in programs or activities or to receive benefits or services Other (please specify): <hr/> |

| | | |
|--|-----|----|
| 26. Does your agency translate signs or posters announcing the availability of language assistance services? | Yes | No |
|--|-----|----|

| | | |
|--|-----|----|
| 27. When your agency updates information on its website, does it also add that content in non-English languages? | Yes | No |
|--|-----|----|

Training of Staff on Policies and Procedures

| | | |
|---|-----|----|
| 28. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to linguistic minorities? | Yes | No |
|---|-----|----|

| | | |
|--|--|--|
| 29. Who receives staff training on working with linguistic minorities? (Select all that apply) | Management or senior staff | Bilingual Staff |
| | Employees who interact with or are responsible for interactions with linguistic minorities | New employees All employees Volunteers Others (Please specify): |
| | | <hr/> None of the above |

| | | |
|--|-----|----|
| 30. Are language access policies and issues included in the mandatory training curriculum for staff? | Yes | No |
|--|-----|----|

| | | |
|--|-----|----|
| 31. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to linguistic minorities? | Yes | No |
|--|-----|----|

| | | |
|---|-----|----|
| 32. Does staff receive periodic training on how to obtain and work with interpreters? | Yes | No |
|---|-----|----|

| | | |
|---|-----|----|
| 33. Does staff receive periodic training on how to request the translation of written documents into other languages? | Yes | No |
|---|-----|----|

| | | |
|---|-----|----|
| 34. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics? | Yes | No |
|---|-----|----|

| | | |
|--|-----|----|
| 35. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter? | Yes | No |
|--|-----|----|

Providing Notice of Language Assistance Services

| | | |
|---|---|--|
| 36. How do you inform members of the public about the availability of language assistance services? (Select all that apply) | <input type="checkbox"/> Frontline and outreach multilingual staff <input type="checkbox"/> Posters in public areas <input type="checkbox"/> "I Speak" language identification cards distributed to frontline staff <input type="checkbox"/> Website | <input type="checkbox"/> Social networking website (e.g. Facebook, Twitter) <input type="checkbox"/> E-mail to individuals or a list serv <input type="checkbox"/> Other (Please specify): _____ <input type="checkbox"/> None of the above |
| 37. Do your translated program outreach materials inform linguistic minorities about the availability of free language assistance services? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 38. Does your agency regularly advertise on non-English media (television, radio, newspaper, and websites)? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 39. Does your agency inform community groups about the availability of free language assistance services for linguistic minorities? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 40. Does your agency inform current applicants or recipients about the availability of language assistance services? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 41. Does the main page of your agency website include non-English information that would be easily accessible to linguistic minorities? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 42. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Monitoring and Updating a Language Access Procedures, Policy, and Plan

| | | |
|---|------------------------------|-----------------------------|
| 43. Does your agency have a written language access policy? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 44. If so, is a description of this policy available to the public? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

- | | | |
|--|--|--|
| 45. How often is your agency's language access policy reviewed and updated? | <input type="checkbox"/> Annually <input type="checkbox"/> Biennially | <input type="checkbox"/> Not Sure <input type="checkbox"/> Other: _____ |
| 46. When was the last time your agency's language access policy was updated? | Month _____ | Year _____ |
| 47. How often does your agency update its data on the linguistic minority communities in your service area? | <input type="checkbox"/> Annually <input type="checkbox"/> Biennially | <input type="checkbox"/> Not Sure <input type="checkbox"/> Other: _____ |
| 48. Does your agency have a language access coordinator? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 49. Does your agency have a formal language access complaint process? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 50. Has your agency received any complaints because it did not provide language assistance services? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 51. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 52. Do you obtain feedback from linguistic minority communities on the effectiveness of your language access program and the language assistance services you provide? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

METRO CONTRACTS FOR LANGUAGE ASSISTANCE

The Metropolitan Government of Nashville and Davidson County has Metro-wide contracts with several vendors to provide language access services. These services are:

- Over-the-Phone Interpretation (OPI)
- In-Person Interpretation
- Written Translation
- Metro Employee Competency Assessment
- Metro Employee Competency Assessment
 - ISA – The Interpreter Skills Assessment measures the candidate's ability to interpret effectively in clinical encounters, evaluating the candidate's knowledge of medical vocabulary, their ability to accurately convey messages from one language to another.
 - LPA – Language Proficiency Assessment – The Language Proficiency Assessment measures your ability to comprehend and speak the target language through a conversation. Candidates generally receive a grade from “No Proficiency” to “Advanced Professional Proficiency”.

Some vendors provide only one service, while others provide all of them. Prices vary slightly between vendors and your department is free to work with any or all of the contracted vendors.

HOW TO ACCESS SERVICES:

While the way services are requested varies between vendors, the process is essentially the same:

1. Your department must set up an individual account with the vendor.
 - a. To do that, contact the vendor for a form and instructions. Generally, you will need to provide a primary contact, a contact for invoicing, and information about which services you may want to use.
 - b. Setting up the account will not cost your department and will not obligate you to use the service. However, without an account, you will not have access when needed.
2. Request training and materials on how to request the contracted services from the vendor. Most materials are provided free of charge. These can include desktop displays, postcard, and stickers.
3. Submit individual requests for services when needed, in the manner provided by the vendor.
4. Pay the invoice when received.

| Vendor | Services | Contact Name | Contact email | Contact Phone | Contract Number |
|------------------------|------------------------------|------------------|------------------------------|------------------------|-----------------|
| Real Time Translation | Document Only | John Grove | jgrove@rttmobile.com | 205-910-6929 | 453927 |
| Language Line | OPI and Document | Joe Matthews | jmatthews@languageline.com | 831-648-7140 | 453924 |
| Voiance | All | Bill Martin | bmartin@voiance.com | 866-742-9080 x 1708 | 453926 |
| LTC Language Solutions | In Person and document | Sydney Lindstrom | slindstrom@ltcls.com | 321-221-7569 | 453925 |
| AllWorld | In Person and document | | request@ALCINC.COM | 301-881-8884 | 453928 |
| Lingualinx | Document Only | Colleen Dempsey | CDempsey@lingualinx.com | 518.388.9000 ext. 1014 | 453929 |
| Bridges | Sign Language Interpretation | J. Eric Workman | eric@bridgesfordeafandhh.org | 615-248-8828 | 411541 |

Real Time Translation

Document Translation

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|---|---------------|-----------------|
| Type of Translation (Telephonic, Face-to-Face, Document) | | | |
| 1 | Document Translation Cost Per Word (Spanish) | \$0.11 | Each |
| 2 | Document Translation Cost Per Word (All Others) | \$0.20 | Each |

Language Line

Over-the-Phone Interpretation (OPI); Document Translation

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|---|---------------|-----------------|
| Type of Translation (Telephonic, Face-to-Face, Document) | | | |
| 1 | Telephonic Per Minute (Spanish) | \$0.61 | Each |
| 2 | Telephonic Per Minute (All Others) | \$0.65 | Each |
| 7 | Document Translation Cost Per Word (Spanish) | \$0.25 | Each |
| 8 | Document Translation Cost Per Word (All Others) | \$0.30 | Each |

Voiance

Over-the-Phone Interpretation (OPI); In-Person Interpretation; Document Translation; Metro Employee Competency Assessment

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|--|---------------|-----------------|
| Type of Translation (Telephonic, Face-to-Face, Document) | | | |
| 1 | Telephonic Per Minute (Spanish) | \$0.59 | Each |
| 2 | Telephonic Per Minute (All Others) | \$0.65 | Each |
| 3 | Face to Face (non-certified) - (1st Hour) | \$1.16 | Each |
| 4 | Face to Face (non-certified) - (1/4 Hour increments, following 1st Hour) | \$1.16 | Each |
| 5 | Face to Face (certified) - (1st Hour) | \$1.16 | Each |
| 6 | Face to Face (certified) - (1/4 Hour increments, following 1st Hour) | \$1.16 | Each |
| 7 | Document Translation Cost Per Word (Spanish) | \$0.13 | Each |
| 8 | Document Translation Cost Per Word (All Others) | \$0.27 | Each |
| 9 | Metro Employee Competency Assessment - (1st Hour) | \$119.00 | Each |

LTC Language Solutions

In-Person Interpretation; Document Translation; Metro Employee Competency Assessment

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|--|---------------|-----------------|
| Type of Translation (Telephonic, Face-to-Face, Document) | | | |
| 1 | Face to Face (non-certified) - (1st Hour) | \$43.00 | Each |
| 2 | Face to Face (non-certified) - (1/4 Hour increments, following 1st Hour) | \$10.75 | Each |
| 3 | Face to Face (certified) - (1st Hour) | \$69.00 | Each |
| 4 | Face to Face (certified) - (1/4 Hour increments, following 1st Hour) | \$17.25 | Each |
| 5 | Document Translation Cost Per Word (Spanish) | \$0.18 | Each |
| 6 | Document Translation Cost Per Word (All Others) | \$0.22 | Each |
| 7 | Metro Employee Competency Assessment - (1st Hour) | \$125.00 | Each |
| 8 | Metro Employee Competency Assessment - (1/4 Hour increments, following 1st Hour) | \$31.25 | Each |
| 9 | Metro Employee (E911 staff only) Per Hour Interpreter Training | \$12.50 | Each |

AllWorld

In-Person Interpretation; Document Translation; Metro Employee Competency Assessment

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|--|---------------|-----------------|
| Type of Translation (Face-to-Face, Document) | | | |
| 1 | Face to Face (non-certified) - (1st Hour) | \$58.00 | Per Hour |
| 2 | Face to Face (non-certified) - (1/4 Hour increments, following 1st Hour) | \$14.50 | Per Qtr. HR. |
| 3 | Face to Face (certified) - (1st Hour) | \$69.50 | Per Hour |
| 4 | Face to Face (certified) - (1/4 Hour increments, following 1st Hour) | \$17.37 | Per Qtr. HR. |
| 5 | Document Translation Cost Per Word (Spanish) | \$0.15 | Per Word |
| 6 | Document Translation Cost Per Word (All Others) | \$0.19 | Per Word |
| 7 | Metro Employee Competency Assessment - (1st Hour) | \$55.00 | Per Hour |
| 8 | Metro Employee Competency Assessment - (1/4 Hour increments, following 1st Hour) | \$13.75 | Per Qtr. HR. |

Lingualinx

Over-the-Phone Interpretation (OPI);

Document Translation

| Item No. | Description | Cost Per Unit | Unit of Measure |
|---|---|---------------|-----------------|
| Type of Translation (Telephonic, Face-to-Face, Document) | | | |
| 1 | Document Translation Cost Per Word (Spanish) | \$0.12 | Each |
| 2 | Document Translation Cost Per Word (All Others) | \$0.18 | Each |

Bridges

Sign Language Interpretation

The MHRC thanks the following colleagues for contributing to this guide:

José Cruz, CHI, CMI-Spanish
Metro Public Health Department
Program Supervisor & Title VI Coordinator

Jessica L. Robertson, MBA-HRM
Juvenile Court
Special Programs Coordinator
STAR Team Division

For additional information about ADA, contact: ADA & Safety Services, 730 2nd Ave South
Lindsley Hall – Fulton Campus, (615) 862-8744, contactADA@nashville.gov

STATEMENT OF ACCESSIBILITY

It is both the policy and responsibility of the Metropolitan Government of Nashville and Davidson County to ensure that its programs, services, and activities are accessible, and that practical use by all people, regardless of whether they are residents or visitors, is not restricted or hindered in violation of standards relating to individuals with disabilities or those who cannot speak, write, read, or understand English. Within reason and as required by law, Metro personnel shall provide accommodations, without charge.

I speak English

Yo hablo Español
(Spanish)

أنا أتحدث العربية
(Arabic)

Anigu waan hadli
Soomaali
(Somali)

Tôi nói tiếng Việt
(Vietnamese)

Ez kurdî dipeyivim
(Kurdish)

म नेपाली बोल्न
(Nepali)

Je parle Français
(French)

Ninasema
Kiswahili
(Swahili)



Please contact the department's Title VI or ADA Coordinator to request language assistance services and/or accommodations.

If you are dissatisfied with your request or if you believe you have been subject to discrimination, you may file a formal complaint with:

Metro ADA & Safety Services, contactADA@nashville.gov (615)862-8744
Metro Human Relations Commission mhrc@nashville.gov (615)880-3370

