

Final Report  
Attaining Title VI Compliance in the  
Metropolitan Government of Nashville and Davidson County

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## Title VI in Metro Government

Title VI of the 1964 Civil Rights Act requires that “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 assistance.” As such, any government agency or department that receives federal dollars is required by law to abide by Title VI, and take reasonable steps to make their programs, services, and activities accessible to all, including the D/deaf, and persons with Limited English Proficiency (LEP). This includes providing ongoing Title VI training to all staff, having an adaptive compliance plan in place, reporting annually on how compliance was maintained over the previous year, including detailed explanations of how any Title VI challenges or complaints were rectified, and the steps taken to assure those challenges are not repeated going forward.

While hiring and firing practices fall under Title VI, Title VI most often comes into play in Metro when people who cannot speak, or speak a language other than English as a first language, need to access government services. Therefore, it is important that LEP language policies be written clearly and all employees understand how to provide services despite language differences. This includes, but is not limited to, translating customer-facing documents into languages other than English, providing interpreters when necessary, tracking data on services provided in languages other than English, and removing barriers to full access for the LEP.

In reviewing Title VI practices and reports throughout Metro Government departments, many deficiencies were uncovered. Many, if not most, Metro departments have no real Title VI training in place, and subsequently may not understand Title VI and why it is important. Most do not have any written language policies in place so there is no way to ascertain whether LEP needs are being met. And most do not have any systems to track Title VI complaints or provide any meaningful follow up. While other Title VI inadequacies were also apparent, these were the most egregious. Any one of these deficiencies could have negative consequences for Metro Government, but in tandem, the consequences could be dire.

The lack of Title VI compliance within Metro is something that needs to be addressed at the systemic level, under the auspices of a dedicated coordinator with authority to demand rigorous compliance measures be enforced.

Fortunately, creating a robust Title VI program within Metro Government does not require building from the ground up. The Metro Human Relations Commission (MHRC) issued a comprehensive report in 2017 on language access that assessed the services provided to linguistic minorities – namely LEP constituents and those who are deaf and hard of hearing– and identified the languages spoken in Nashville that fall under the auspices of full Title VI compliance (Appendix A). An accompanying language access toolkit outlines policies and practices, and resources already available within Metro (Appendix B).

In addition, several departments within Metro have rigorous Title VI compliance measures in place that could easily be expanded throughout the whole of Metro Government with limited disruption. Metro Nashville Health Department (MNHD), the Metro Public Library (MPL), and the Davidson County Juvenile Courts all have comprehensive Title VI policies under which they operate day to day, along with daily tracking and data collection and reporting. It is the best practices utilized by these three departments that we recommend be adopted and implemented within the Metropolitan Government of Nashville and Davidson County.

To be fully compliant with Title VI requirements, Metro and its agencies must

1. Appoint a Title VI coordinator
2. Provide Title VI training to all staff
3. Develop a Title VI policy statement and post it in visible areas, including a mechanism for advising customers of their rights under Title VI and how a discrimination report can be filed

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4. Acquire signed Title VI reports from each individual department on an annual basis
5. Include Title VI assurances in all contracts
6. Monitor ethnicity of contractors and subcontractors to ensure equitable hiring practices
7. Log and respond to any and all complaints related to potential non-compliance issues

To meet these requirements, we recommend the following:

#### Title VI Information & Dissemination

1. Title VI notices should be publicly displayed at all Metro sites. These notices should be posted at minimum in English, Spanish, and Arabic.
2. All Metro employees, both full and part time, must be required to take Title VI training as a condition of employment. For MPHD, the Tennessee Department of Health (TDH) provides comprehensive Title VI training information through a PowerPoint presentation with embedded videos that can be viewed online, or during a group classroom session.
  - a. We recommend Metro explore if the state provides training that is not specific to the health department.
  - b. If the state does not already have such a training, one should be sought elsewhere or created. The training should encompass the following information:
    - The history of Title VI
    - A determination of the impact of Title VI on the city
    - Examples of Title VI violations/discrimination
    - Limited English Proficiency (LEP)
    - Interpreter information
    - The consequences of non-compliance

#### LEP

1. The procedures outlined below help to ensure that LEP individuals receive the language assistance necessary to afford them meaningful access to Metro government.
  - a. Each customer should be asked if they need an interpreter during their visit.
    - If the answer is “yes”, the primary language should be recorded for later reporting purposes.
    - If the individual does not need an interpreter, English should be logged as the primary language.
  - b. Data reporting
    - An annual report should be produced that includes:
      - The total number of persons served
      - The total number of persons for whom English is not the primary language.
  - c. Oral Language Interpretation:
    - Qualified interpreters should be available on-site or over-the-phone (OPI).
  - d. Most customer-facing documents should be translated into a minimum of Spanish and Arabic.
    - “I speak...” cards should be made available to assist LEP clients in identifying their language needs. (Appendix C)
    - For those customers who speak languages other than Spanish or Arabic, Metro should provide:
      - Qualified oral translation of the documents in a language that is understandable to the LEP client.
  - e. Notice about their right to free language assistance should be posted on bulletin boards or in areas clearly visible to customers in all departments. This notice should

be provided in Metro's most frequently spoken languages:

- Spanish
- Arabic
- Burmese
- Swahili
- Nepali

#### Contact Information

1. Metro must designate an individual within the MHRC as the official Metro Title VI coordinator to handle questions, concerns, complaints, or requests for additional information regarding Title VI of the Civil Rights Act.
  - a. This coordinator must be given the full authority to enforce Title VI requirements within every Metro department.
2. All Metro departments that interact with customers should designate a departmental Title VI coordinator responsible for day to day monitoring of departmental data gathering and reporting, facilitating the handling of any complaints, and overseeing the creation of annual reports. These individuals should work with Metro's official coordinator at MHRC to assure that Title VI compliance is seamless, and that complaints are handled properly and in a timely manner.

## Appendix A

# Metro Language Access Report

February 2017



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## INTRODUCTION

Given the rapid changes to Davidson County’s demographic landscape, it is important to ensure that Metro government is doing all it can to meet the needs of our increasingly diverse constituents. The guiding principles outlined in NashvilleNext, a plan for growth in Davidson County over the next 25 years, emphasize opportunity for all. With an expected growth of 186,000 people in Davidson County alone, it is necessary to build the infrastructure to support the needs of all Nashvillians, particularly those for whom language barriers often limit access to vital services and resources necessary for health, well-being, and prosperity.

Nashville is not alone in these challenges. Conversations about accessibility are happening at both the local and national level. Cities across the United States have created language access plans in an effort to better serve members of their communities who are Limited English Proficient (LEP). The King County Office of Performance Strategy & Budget, for example released its *Limited English Proficiency Provisio Response Report* in 2014, which analyzes its current practices and offers short and long-term recommendations for improving access to government services. At the federal level, the Department of Homeland Security emphasizes “meaningful access” to LEP communities and establishes language service policy in its Language Access Plan. This is, in no small part, an effort to comply with Title VI, which was enacted as part of the Civil Rights Act of 1964, prohibiting discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

In Davidson County, the need is perhaps even greater than in other parts of the country. It has one of the fastest-growing immigrant populations in the country, outpacing more established gateways in states like California and Texas. While recent Census estimates approximate the foreign-born at 5% of the Tennessee population, the share of the foreign-born in Nashville is consistent with the national average, at 13% of the population (Migration Policy Institute). The majority of immigrants are arriving from non-English speaking countries, as evidenced by what we find in our local schools. Within Metro Nashville Public Schools, students speak more than 100 different languages, and nearly a third (30%) speak a language other than English at home. Davidson County is expected to further diversify over the next 25 years. A Demographic Trends report produced for NashvilleNext predicts that, by 2040, Hispanics will represent a third (33.9%) of the total county population. They currently sit at 10% of the population. Additionally, Asians, who currently make up 3% of the population, will see a doubling in their share of the population to 6.9% in 2040.

In the spirit of inclusivity and access, the Metro Human Relations Commission, the Title VI Coordinator for Metro Nashville, has conducted a study to comprehensively assess the services provided to linguistic minorities –namely, LEP constituents and those who are Deaf<sup>1</sup>, deaf, and hard of hearing. The *Metro Language Access Study (MLA)* offers a snapshot of how Metro Nashville is serving these constituents, with the goal of highlighting best practices already in existence within Metro departments and identifying areas of opportunity for improvement.

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<sup>1</sup> Deaf with a capital “D” refers to those who identify with Deaf culture, including using American Sign Language, while deaf (with a lower case “d”) refers to the condition of hearing loss. For the sake of this report, we will rely upon the preferred terminology of our participants.



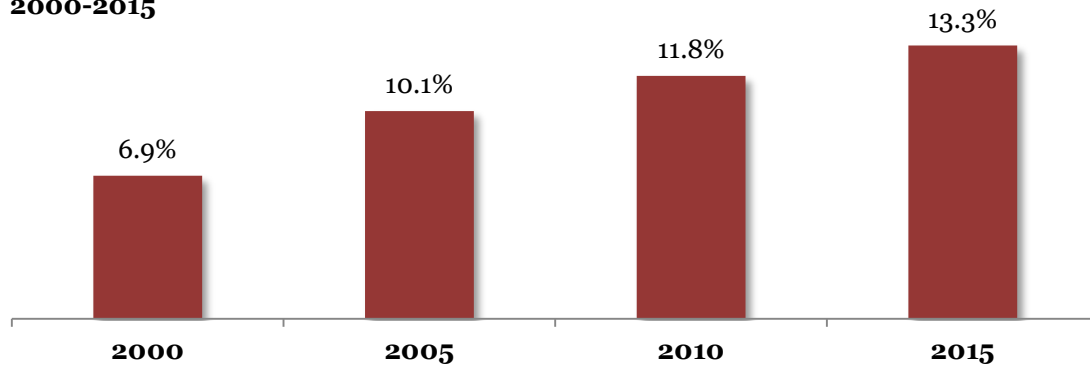
There are three primary sources of data for the study, collected over the course of 9 months (January – September 2016). First, we conducted a survey of Metro department heads, including those that oversee smaller branches and facilities, and asked about the frequency of their interactions with LEP, Deaf, and hard of hearing communities, the data available to track these interactions, and the services they have available to assist these constituents. Second, we surveyed organization leaders and service providers who work directly with LEP, Deaf, and hard of hearing communities. These respondents were asked to identify the Metro departments with which they most frequently interact, the nature of these interactions, and where there may be obstacles to effective communication. Finally, we conducted a total of seven community focus groups with participants who were part of or worked directly with immigrant, refugee, Deaf, and hard of hearing communities. Participants were engaged in a deeper conversation about their expectations for Metro government and their experiences in accessing services.

This study represents an initial step towards improving the quality of Metro services and facilitating the civic integration of all Nashvillians. It is intended to offer an assessment of Metro government service provision to linguistic minorities, from the perspective of government departments, agencies, and commissions and from communities whose access may be limited because of language barriers. We begin with an overview of the Limited English Proficient (LEP) and Deaf and hard of hearing communities in Nashville and introduce key terminology used throughout the report. Next, we present the findings of the department survey, the community survey, and the community focus groups. Finally, we conclude with suggested future steps outlined in the last section of the report.

## LIMITED ENGLISH PROFICIENT COMMUNITIES

When speaking about Limited English Proficient populations, we are often referring to communities in which a substantial proportion of the population is foreign-born. The state of Tennessee has emerged as a new immigrant destination, with the growth of the foreign-born outpacing that in traditional states like California and Texas (Zong & Batalova 2016). Indeed, the growing attention given to LEPs and English Language Learners (ELLs) has much to do with the substantial growth both state-wide and within Davidson County of the share of residents who were born outside the United States. Nashville is a unique context, having long been a site of refugee resettlement and, in recent decades, attracting large numbers of immigrants as a result of its flourishing economy and internationally-recognized universities. In fact, a background report on Equity and Exclusion submitted for NashvilleNext notes that the number of immigrants in the Tennessee workforce increased by 91% between 2000 and 2010 (“Equity & Inclusion” 2014).

**FIGURE 1. FOREIGN BORN POPULATION IN DAVIDSON COUNTY, 2000-2015**

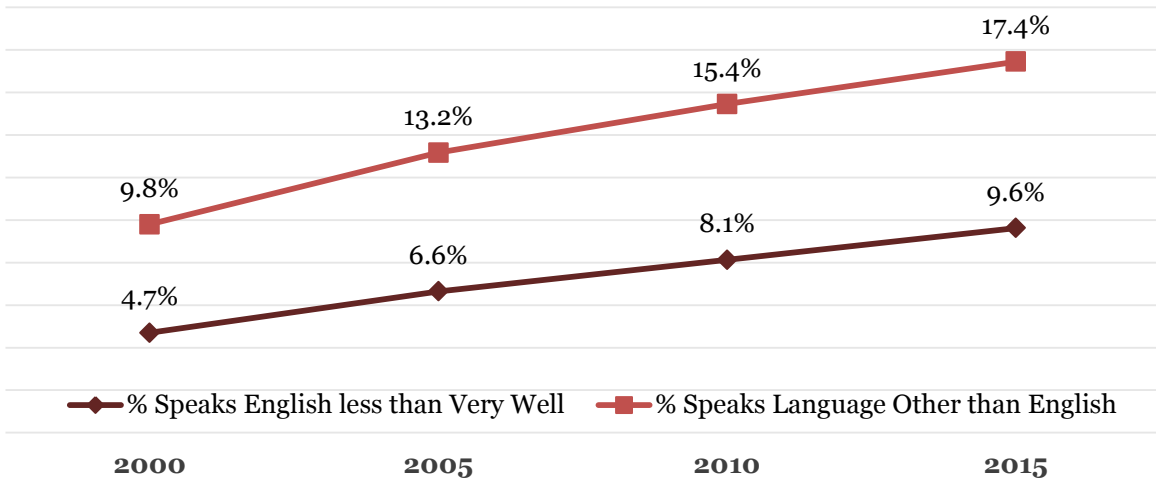


Source: American Community Survey, 1-Year Estimates

Figure 1 above shows the steady increase in the percent of the foreign-born population of Davidson County between 2000 and 2015. While in the year 2000 they made up 6.9% of the total population, the foreign-born now represent more than double that figure. The largest jump in the foreign-born population took place between 2000 and 2005, from close to 7% to about 10%. In 2010, the population grew to 11.8%, with another increase in 2015. The foreign-born population is now estimated at 13.3% of the total Davidson County population (American Community Survey, 2015 1-year Estimates).

Figure 2 shows the concurrent increases of the populations that speak a language other than English and who speak English “less than very well.” In 2000, the share of the population that spoke a language other than English was just under 10%. This increased by several percentage points in 2005, and again in 2010. The most recent figures show this share at nearly 20% of the population. We see a similar pattern for the percentage of Nashvillians who speak English “less than very well.” While in 2000, less than 5% of the population fell into this category, the number has steadily increased to 6.6% in 2005, 8.1% in 2010, and now to just under 10% (more than double the figure in 2000).

**FIGURE 2. CHANGES IN PERCENT OF POPULATION\* THAT SPEAKS LANGUAGE OTHER THAN ENGLISH AND WHO SPEAK ENGLISH LESS THAN "VERY WELL," 2000-2015**



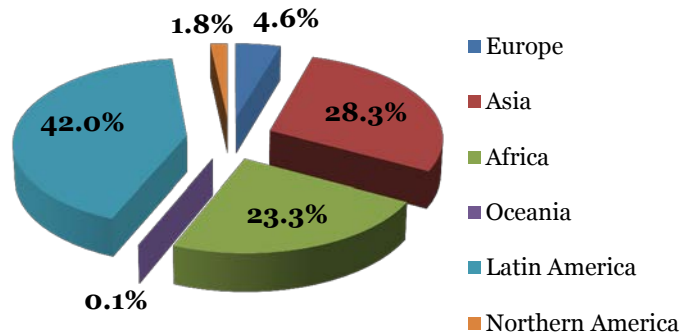
\*age 5 and older

Sources: Census 2000 Summary File 3, American Community Survey (2005, 2010, 2015)

As it pertains to place of birth, the largest share of foreign-born Nashvillians have their origins in Latin America (42.0%) – most from Mexico – while a substantial share also come from Asia (28.3%) and Africa (23.3%). Smaller shares also come from Europe (4.6%), Northern America (1.8%), and Oceania (0.1%).

It is important to note that Nashville is a unique context, with a significant segment of the foreign-born in Nashville arriving as refugees. Indeed, an estimated 12% of Nashville’s population growth is a result of refugee resettlement. In 2015, the largest shares of new refugees to Tennessee came from Burma (24.6%), Iraq (20.7%), DR Congo (12.9%), and Somalia (13.4%). The majority, 71%, of these new refugees were resettled in Davidson County (Tennessee Office for Refugees, 2015 Year in Review).

**FIGURE 3. REGION OF ORIGIN FOR FOREIGN-BORN POPULATION, 2015**



Source: American Community Survey, 2015 1-Year

## DEAF AND HARD-OF-HEARING COMMUNITIES

Limited English Proficient communities are not the only ones who encounter issues of accessibility. While there are some overlaps, the Deaf, deaf, and hard of hearing communities have their own unique obstacles and challenges. Many in the community reject the notion that they are disabled and instead see the obstacles to services, resources, and information as an issue of language access.

Middle Tennessee is home to more than 200,000 individuals with hearing loss (“Did You Know?”) but the number of those who use American Sign Language (ASL) is more difficult to capture. Despite the fact that it is not a visual representation of English, ASL is often not included as a language “other than English” on surveys and censuses. As such, questions related to language and English-speaking ability obscure the people whose primary language is ASL. Additionally, students who are ASL users are often not provided with the same support as English Language Learners because they are not recognized as ELLs themselves.

Much of the conversation about access for the Deaf and hard of hearing often references the Americans with Disabilities Act (ADA) of 1990, which outlines many of the protections afforded to the Deaf, stating “no individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.” In addition, many of the services that cater to the community are often included under disability services.

To counter misconceptions, community organizations make note of the distinction between “Deaf,” which speaks to a cultural identity with a distinct language, and “deaf,” referring to the physical condition of hearing loss (“Did You Know?”; “Working with Deaf, Hard of Hearing, and Deaf-Blind Individuals”).

## KEY TERMINOLOGY

Limited English Proficient (LEP): People who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Deaf: “indicates identification with Deaf culture, including its primary language, American Sign Language.” (“Did You Know?”)

deaf: “refers to the conditions of hearing loss.” (“Did You Know?”)

Interpreter: “converts information from one spoken language into another—or, in the case of sign language interpreters, between spoken language and sign language.”  
(U.S. Department of Labor)

Translator: “converts written materials from one language into another language.”  
(U.S. Department of Labor)

## KEY FINDINGS

### METRO DEPARTMENT SURVEY

- The majority of Metro departments (77.5%) and extensions (82.9%) interact with linguistic minorities on a regular basis, albeit with a wide range in the average number seen per month.
- Despite the routine interaction with linguistic minorities, fewer departments and extensions collect and utilize data to assess their services to these constituents.
  - 30% of Metro departments and 8.6% of extensions have a process for collecting data on the number of linguistic minorities served.
  - 25.6% of departments and 11.4% of extensions maintain data on the languages spoken by constituents.
  - 57.5% of departments and 40% of extensions use data to identify the linguistic communities they serve.
  - 27.5% of departments and 17.1% of extensions have a system in place to track language assistance services.
- The most common non-English languages as reported by Metro departments and extensions are (in order by most common to least) Spanish, Arabic, Kurdish, Somali, Burmese, and Vietnamese.
- 35% of departments and 8.6% of extensions have a designated language access coordinator, someone tasked with the responsibility of assessing and improving services to linguistic minorities.
- Nearly half (45%) of Metro departments and a quarter of extensions (25.7%) report having a contract with a language assistance provider. Although Metro, as a whole, has contracts with three agencies for telephone and in-person interpretation – Voiance, Optimal Phone Interpretation, and AllWorld Language Consultants – the survey revealed that departments and extensions use a number of different agencies for language assistance.
- Close to half of departments (47.5%) and extensions (51.4%) report having bilingual staff to assist linguistic minorities. However, just 26.3% of departments and 27.8% of extensions with bilingual staff indicated that they use a language fluency assessment to determine proficiency.
- About half of departments (47.5%) and extensions (45.7%) report translating vital documents into other languages. The most common languages of translation are Spanish, Arabic, Kurdish, Somali, and Vietnamese.
- A quarter of departments (25%) and 17.1% of extensions report advertising on non-English media.

### COMMUNITY SURVEY

- According to respondents, the most common languages spoken by their communities are Spanish, Arabic, Burmese, Kurdish, Nepali, and Somali.
- The three Metro departments with which community respondents report having the most interaction are the Public Library, Public Health, and Social Services.

- Average ratings for Metro (on a scale from 1-5) varied on four factors: ease in interactions (3.0); likelihood that someone speaks the same language as a community member (2.1); likelihood that translation/interpretation services are available (2.8); and ease in gaining access to services if constituents do not speak English (3.0).
- Four departments were rated above average across the four factors – Emergency Communications, Fire, Juvenile Court, and the Nashville Public Library.
- Community respondents reported that their communities typically find out about government services through “word of mouth” or through case workers and community organizations.
- Community members often rely upon children, friends, and other family members to act as interpreters. Case workers also play a substantial role in assisting their clients in their interactions with Metro government.
- Other obstacles to access, according to community respondents, include transportation, cultural awareness, and a lack of education from both Metro departments and community members alike.

#### COMMUNITY FOCUS GROUPS

- Overall, participants felt Metro was doing well in providing access to linguistic minorities, especially compared to surrounding counties.
- Community members have some degree of difficulty in distinguishing between the roles and responsibilities of different levels of government – federal, state, and Metro.
- Participants shared that their communities get their information about Metro government from friends or family, echoing the findings from the community survey.
- While Spanish-speaking community members benefit from existing media (radio, television, newspapers) and the availability of bilingual interpreters, smaller linguistic communities explain that they struggle to access services and information.
- Some departments were said to be “easier than other places” to navigate – this included the libraries, community center, and those departments tied to the criminal justice system (Public Defender, District Attorney).
- Other barriers to access included social and legal incongruence between U.S. and country of origin, lack of cultural sensitivity, and time.
- Participants in all focus groups made it clear that not all interpreters are good interpreters – participants frowned upon the all-too-common-practice of relying upon children and emphasized the importance of professional interpreters.
- As seen by participants, the government’s process of choosing an interpretation service provider is so focused on the lowest bidder that it fails to take into account the needs of the local community.
- While outside the scope of Metro’s jurisdiction, driver licenses were a major theme of discussion. In particular, participants questioned the limited number of languages in which the driver’s test was available and pointed out the linkages between transportation, affordable housing, and traffic.

## METRO LANGUAGE ACCESS DEPARTMENT SURVEY

The Metro Human Relations Commission conducted a survey of Metro departments, inquiring about their interactions with Limited English Proficient (LEP), Deaf, and hard of hearing populations. The survey was conducted from January 4 – February 12, 2016 and sent to department heads, branch and facility managers, as well as Title VI Coordinators. The 39 question survey was divided into three sets of questions: Identifying LEP individuals; Language assistance services; and Outreach to LEP communities. Questions included in the survey are located in Appendix 1.

A total of 39 Metro departments responded to the survey. Additionally, 35 extensions -- branches, facilities, precincts, and centers -- of Metro departments also completed the survey for a total of 75 responses.<sup>2</sup> These are italicized in the list below.

Agricultural Extension	NCAC
Assessor's Office	Office of English Learners
Beer Permit Board	Office of Family Safety
Circuit Court Clerk	Parks and Recreation
Codes & Building Safety	<i>Bellevue Community</i>
Criminal Court Clerk	<i>Cleveland Park Community Center</i>
Election Commission	<i>Coleman Park Community Center</i>
Emergency Communications Center	<i>Easley Center</i>
Fairgrounds Nashville	<i>East Park Community Center</i>
Finance	<i>Hadley Park Community Center</i>
Fire	<i>Looby Community Center</i>
General Services	<i>Madison Community Center</i>
Historical Commission	<i>Napier Community Center</i>
Human Resources	<i>Old Hickory Community Center</i>
Internal Audit	<i>Parkwood Community Center</i>
ITS	<i>Sevier Park Community Center</i>
Juvenile Courts	<i>Southeast Community Center</i>
Law	<i>S. Inglewood Community Center</i>
MDHA	<i>Watkins Park Community Center</i>
Metro Clerk's Office	Planning
Metro Council	Police
Metro Nashville Arts Commission	<i>East Precinct</i>
Metro Water	<i>West Precinct</i>
MTA	<i>Central Precinct</i>
Municipal Auditorium	<i>Madison Precinct</i>
Nashville General Hospital	<i>El Protector Program</i>
Nashville Public Library	Public Defender
<i>Bellevue Branch</i>	Public Health
<i>Donelson Branch</i>	<i>WIC/South Nutrition</i>
<i>East Branch Library</i>	<i>Lentz WIC Clinic</i>
<i>Goodlettsville Branch</i>	<i>Commodity Foods</i>
<i>Green Hills Branch</i>	Public Works
<i>Hadley Park Branch</i>	Sheriff's Office
<i>North Branch</i>	Sports Authority
<i>Old Hickory Branch</i>	<i>Nashville Sounds</i>
<i>Southeast Branch</i>	<i>Nashville Predators</i>
<i>Thompson Lane Branch</i>	State Trial Courts

<sup>2</sup> We include an additional response from Nashville Public Library specifically for services to the deaf and hard of hearing

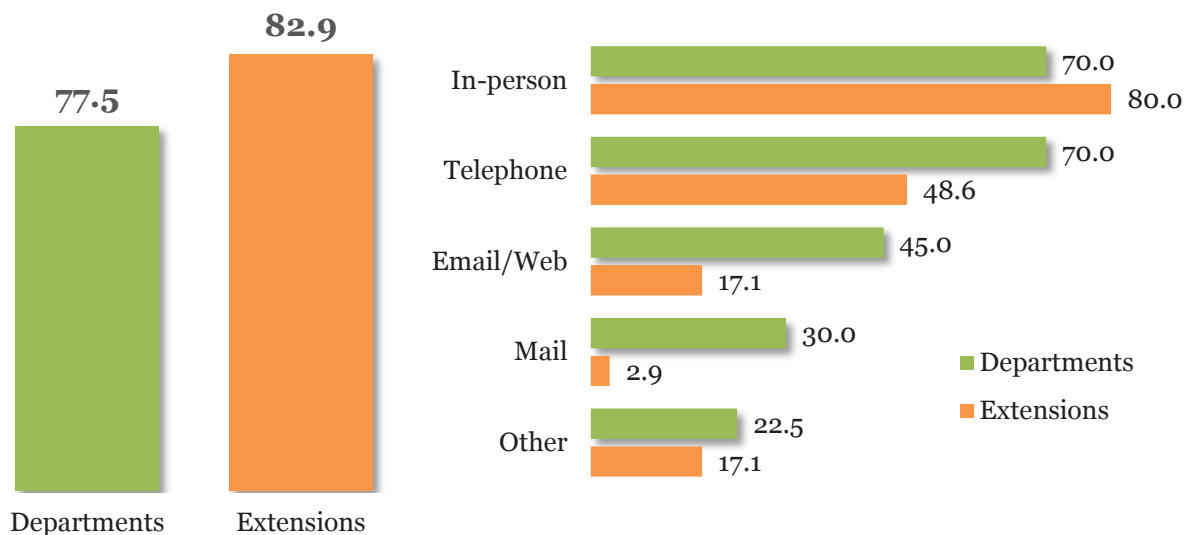
In our analysis, we distinguish between department and extension for a number of reasons. First, we expect that the level of interaction with constituents is likely to be different. For example, it is possible that extensions like community centers have greater interaction with the public than the staff and administration located directly within the Parks and Recreation department, given the nature of their responsibilities. Second, we expect that data collection and language assistance efforts may also differ between departments and extensions. Most departments have an assigned Title VI coordinator who has likely received training on providing assistance to constituents who require it. Individual extensions, however, may not have designated such a person. Thus, a department may have the infrastructure in place to more effectively monitor and assist in interactions with linguistic minorities, while an extension may not. Our figures and reporting reflect these expectations.

### METRO INTERACTION WITH LEP, DEAF, AND HARD OF HEARING

The first set of questions is designed to understand the interaction between Metro departments and extensions and LEP, Deaf, and hard of hearing constituents. We ask about the nature and frequency of interactions and the processes for identifying linguistic minorities.

We first ask whether or not departments interact with LEP, Deaf, and/or hard of hearing constituents.

**FIGURE 4. PER CENT OF DEPARTMENTS AND EXTENSIONS THAT INTERACT WITH LINGUISTIC MINORITIES & TYPE OF INTERACTION**



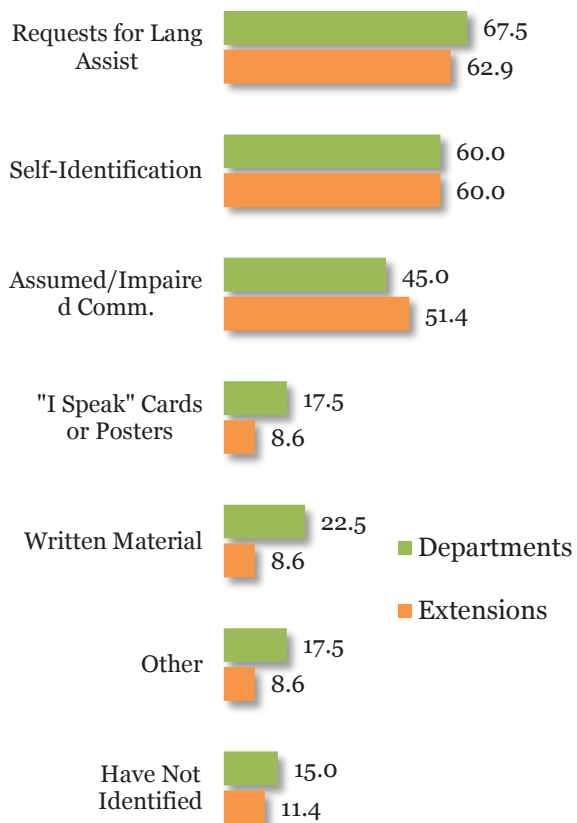
As seen in Figure 4, the vast majority of Metro departments that responded to our survey – more than three-quarters (77.5%) – reported having staff that interacts or communicates with LEP, Deaf, and/or hard of hearing individuals. These interactions happen in a variety of ways, including: in-person (70%), telephone (70%), email or website (45%), or mail (30%). Departments also listed additional forms of communication, including videophone, texting, and Skype.



Compared to departments, a greater share of the Metro extensions reported having staff that interacts or communicates with these populations. Of the 35 extensions, 82.9% reported interactions with linguistic minorities. A larger percentage of extensions interact with these constituents in-person (80% vs 70% of departments). However, extensions report having less interaction with these constituents by way of all other forms of communication: 48.6% of extensions communicate over the telephone, 17.1% via email or website, and 2.9% by mail. Facebook was listed as an additional method of communication.

When asked how they identify an LEP, Deaf, or hard of hearing constituent, departments relied on a combination of different strategies. Figure 5 reveals that the majority of departments (67.5%) respond to individual requests for language assistance services, while for 60% of departments, the constituent self-identifies either in person or on forms. Almost half (45%) of departments assume a person is LEP, Deaf, and/or hard of hearing if communication seemed impaired, while 17.5% of departments identify LEP individuals through the use of “I Speak” language identification cards or posters. Another 22.5% identify them based on written material submitted to the department. Other modes of identifying linguistic minorities included a four factor analysis and language assistance plan, a home language survey sent home to families, outreach to Deaf and hard-of hearing communities, and communication with partner agencies about limited English proficient communities. Additionally, 15% of departments indicated that they have not identified LEP individuals. Several respondents noted that this was a result of their department having little interaction with the general public.

**FIGURE 5. WAYS OF IDENTIFYING AN LEP, DEAF, AND/OR HARD OF HEARING CONSTITUENT**

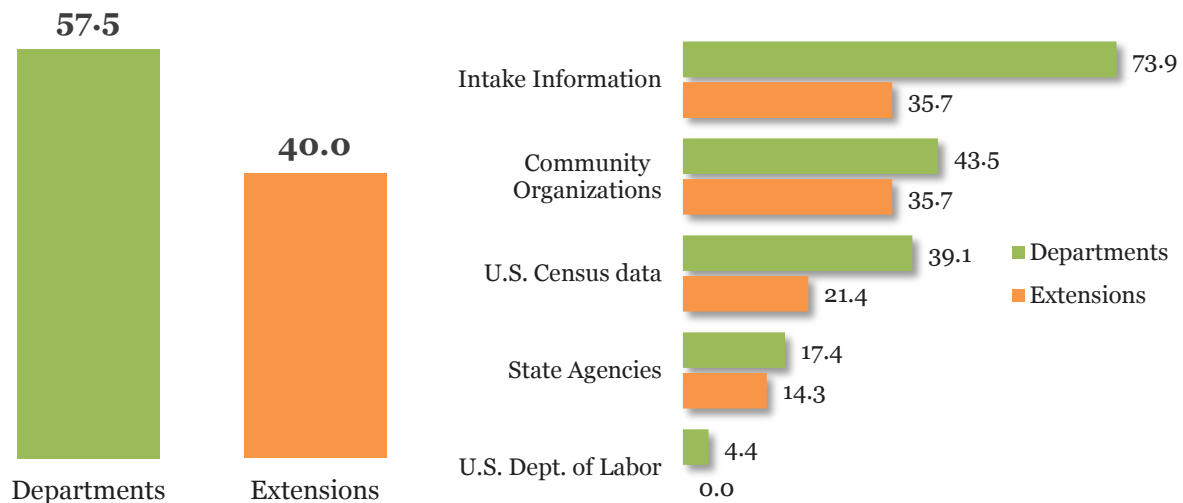


Comparable numbers among Metro extensions suggest that they identify an LEP, Deaf, or hard of hearing constituent in similar ways to departments. A little more than 60% responded to requests for language assistance, while 60% reported that constituents self-identified in person or on forms. Slightly more than half of extensions assumed a person was LEP, Deaf, or hard-of-hearing if communication was impaired. However, unlike departments, a smaller share of extensions indicated that they identify linguistic minorities through the use of “I Speak” Cards

(8.6%) or in written material (8.6%). An additional 11% of extensions indicated that they have not identified LEP, Deaf, and/or hard of hearing individuals. This is less than the 15% of departments that reported having not identified any linguistic minorities.

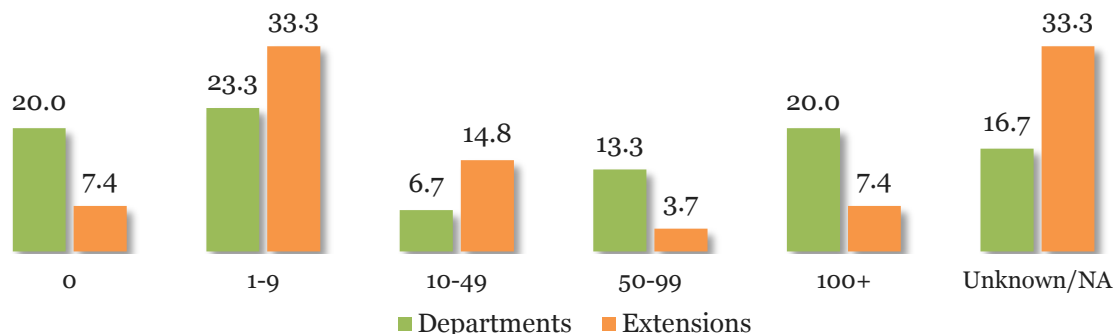
In terms of linguistic *communities*, more than half of all Metro departments (57.5%) use some type of data to identify the populations they serve. Figure 6 below shows that, of these departments, more than 70% rely upon their own intake information and 43.5% use information from community organizations. Another 39.1% use U.S. Census data, while additional sources of information include state agencies (17.4%) and the U.S. Department of Labor (4.4%). Departments also identified alternative sources of data, including vendor information, registration forms, data warehouses, and other contacts.

**FIGURE 6. DEPARTMENT AND EXTENSION DATA USED TO IDENTIFY LINGUISTIC COMMUNITIES AND TYPES OF DATA USED**



Fewer Metro extensions report using data to identify linguistic communities – 40% compared to the nearly 58% of departments. Of these, fewer extensions than departments used internal intake information (35.7% vs. 73.9% of departments), information from community organizations (35.7% vs 43.5%), Census data (21.4% vs 39.1%), and state agency data (14.3% vs 17.4%). No extension used Department of Labor data.

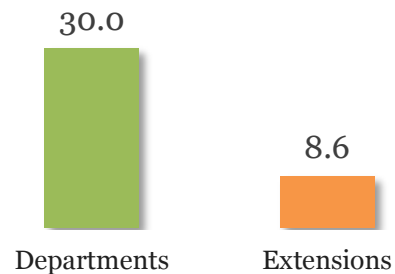
**FIGURE 7. AVERAGE NUMBER OF LINGUISTIC MINORITIES PER MONTH**



Given the varying roles and obligations of Metro departments and extensions, the number of LEP, Deaf, and hard of hearing constituents with whom they interact per month ranges a great deal, from 0 – 2,000. Of the departments that answered the question, a fifth indicated that they do not serve any linguistic minorities in any given month while a comparable share (23.3%) serves between 1-9 constituents. Nearly 7% of departments see between 10-49 linguistic minorities every month and about 13% serve between 50-99. An additional 20% see 100 or more LEP, Deaf, or hard-of-hearing individuals every month. For 17% of the departments, the number of LEP, Deaf, or hard-of-hearing individuals they serve is either “unknown” or “not available,” suggesting that this sort of data is not consistently maintained. This is displayed in Figure 7.

In contrast to departments, only 7% of Metro extensions indicated that they do not see any linguistic minority in a given month. A greater share of extensions serves between 1-9 constituents (33%) and between 10-49 constituents (15%), compared to departments. However, fewer extensions report serving greater numbers of linguistic minorities – 4% serve between 50-99, and 7% serve more than 100 – compared to departments. A little more than 33% of extensions indicated that the number was either “unknown,” “not available,” or directed us to contact someone else outside of their extension who might know. Some respondents could not offer a number but provided an estimate of the percentage of their constituents that are linguistic minorities.

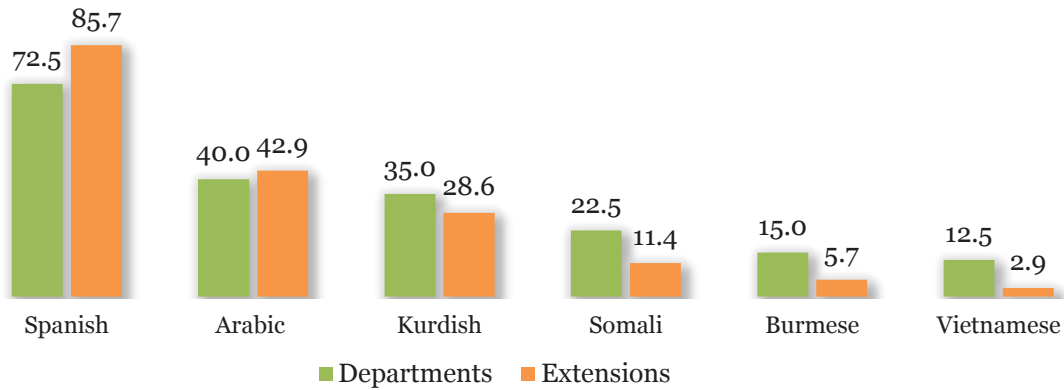
**FIGURE 8. PERCENT OF DEPTS AND EXTENSIONS WITH PROCESS FOR COLLECTING DATA ON NUMBER OF LINGUISTIC MINORITIES**



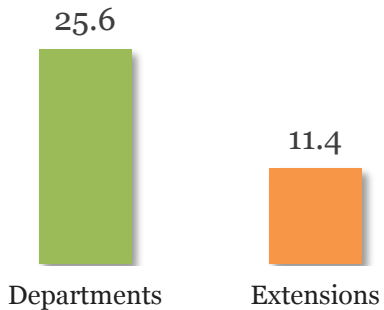
Nearly a quarter of both departments and extensions (25% and 23%, respectively) skipped over this question. This is not surprising, given that only 30% of departments and 9% of extensions reported having a process to collect data on the number of linguistic minorities served. This is displayed in Figure 8.

We next asked about the most frequently-encountered non-English languages within each department or extension. Figure 9 shows the most 6 most common languages reported by departments and extensions. Spanish is the most common non-English language across Metro, with 73% of departments and nearly 86% of extensions listing it. This was followed by Arabic (40% of departments, 43% of extensions), Kurdish (35% of departments, 29% of extensions), Somali (23% of departments, 11% of extensions), Burmese (15% of departments and 6% of extensions), and Vietnamese (13% of departments, 3% of extensions). While not included in Figure 9, 17% of extensions listed French as a common language, though no departments did. Other languages listed include Farsi, Korean, Cambodian, Croatian, Nepali, Italian, Karen, Swahili, and Chinese. Some responses were not languages, but instead referred to racial/ethnic or religious groups (e.g. Hispanic, Muslims, Middle Eastern, Asian).

**FIGURE 9. MOST COMMON NON-ENGLISH LANGUAGES IN METRO DEPARTMENTS AND EXTENSIONS**



**FIGURE 10. PERCENT OF DEPTS AND EXTENSIONS WITH PROCESS FOR COLLECTING DATA ON LANGUAGES SPOKEN BY CONSTITUENTS**



Similar to the percentages in Figure 8, Figure 10 shows that relatively few departments maintain data on the languages spoken by constituents. A little more than a quarter of departments and 11% of extensions reported collecting this sort of data.

The next section examines the language assistance services that departments and extensions offer linguistic minorities, as well as related data they may collect.

**LANGUAGE ASSISTANCE SERVICES**

The second set of questions asks about the existing practices and policies in place within departments and extensions to provide services to linguistic minorities.

To begin, we asked whether departments and extensions have a language access coordinator. As shown in Figure 11, a little over a third of departments and less than 10% of extensions indicated that they have a designated coordinator. For 5 departments and 1 extension, this role was filled by the Title VI coordinator in their department.

**FIGURE 11. PERCENT OF DEPARTMENT AND EXTENSIONS WITH A LANGUAGE ACCESS COORDINATOR**

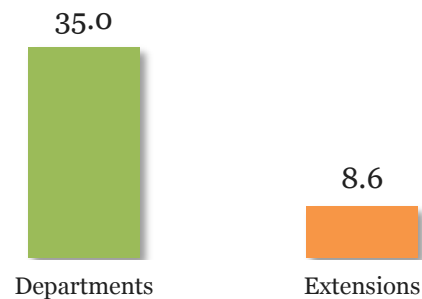
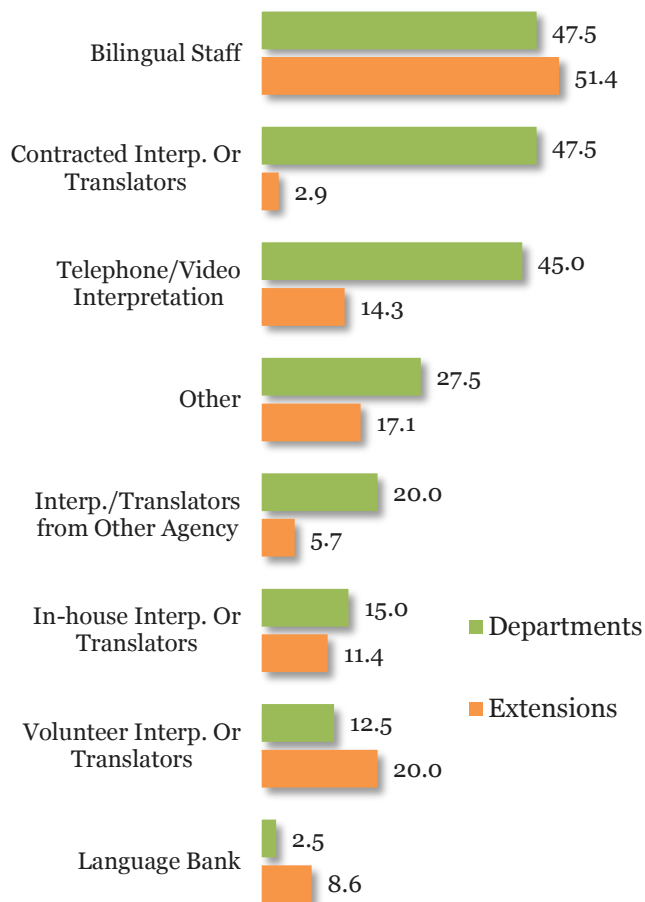


Figure 12 shows the language assistance services that Metro departments and extensions provide. Nearly half of Metro departments (48%) have bilingual staff that assists with linguistic minorities. Comparable shares of departments indicated that they use contracted interpreters or translators (48%) or telephone or video interpretation services (45%). A fifth of departments use interpreters or translators borrowed from other agencies while 15% rely upon in-house interpreters or translators. Nearly 13% of departments use volunteer interpreters or translators and a small share (3%) use a language bank. Other responses (which nearly 30% of departments provided) include partnering with other departments for assistance and maintaining a bank of translated documents. Comparably, Metro extensions rely largely upon their bilingual staff (51.4%) and on volunteer interpreters and translators (20%). Smaller shares use telephone/video interpretation (14.3%) and in-house interpreters or translators (11.4%). Fewer utilize language banks (8.6%), interpreters and translators from other agencies (5.7%), and contracted interpreters and translators (2.9%). Other services listed included English as a Second Language (ESL) classes and a centralized department language bank.

**FIGURE 12. INTERPRETATION SERVICES PROVIDED BY DEPTS AND EXTENSIONS**



**FIGURE 13. PERCENT OF DEPARTMENTS AND EXTENSIONS WITH A SYSTEM IN PLACE TO TRACK LANGUAGE ASSISTANCE SERVICES**

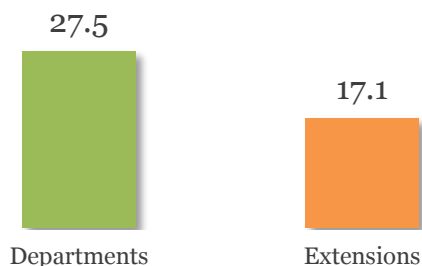
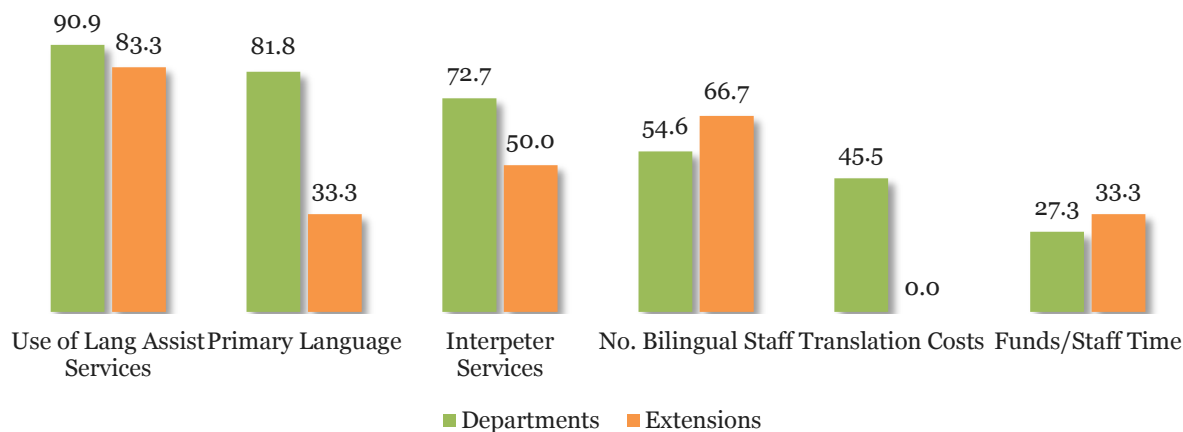


Figure 13 shows the percentage of departments and extensions that have a system in place to track the language assistance services they provide. As with prior figures, the share of departments and extensions that maintain data concerning language assistance services is relatively small. Only 28% of departments and 17% of extensions have such a system in place.

Figure 14 shows the type of data that departments and extensions maintain about the language assistance services they provide. This includes just those departments or extensions that indicated that they track the services they provide.

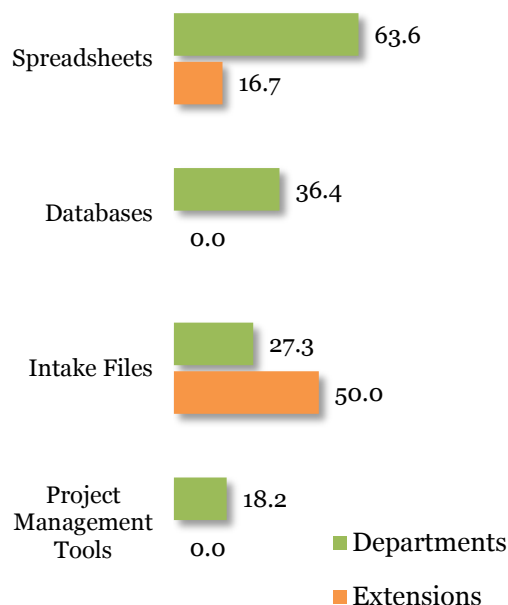
**FIGURE 14. PERCENT OF DEPARTMENTS AND EXTENSIONS THAT MAINTAIN DATA ABOUT LANGUAGE ASSISTANCE SERVICES PROVIDED**



Of these, 91% of departments track the use of language assistance services, compared to 83% of extensions. Nearly 82% of departments and 33% of extensions record constituents’ primary language, while 73% of departments and half of extensions track the use of interpreter services. More than half of departments maintain numbers on their bilingual staff; more than two-thirds of extensions do the same. Although 46% of departments track translation costs, no extensions reported keeping this data. Almost 28% of departments and a third of extensions record the funds and/or staff time spent on language assistance services.

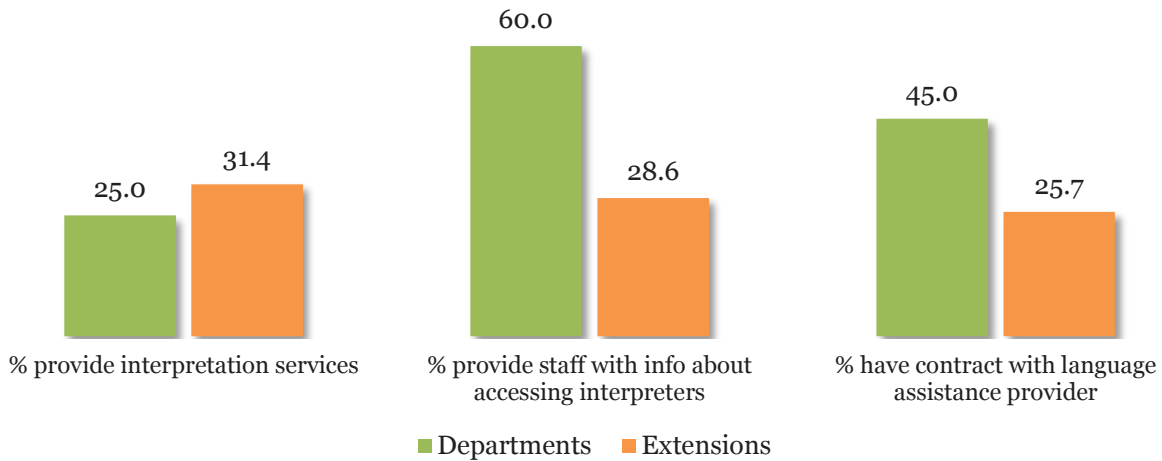
Figure 15 shows that this data on language assistance services is maintained in several ways. Nearly two-thirds of departments and 17% of extensions indicated that they utilize spreadsheets to track this information. More than a third of departments use databases, while no extensions use them. Another 27% of departments and half of extensions use intake files to maintain this data. A smaller share – just 18% of departments – use project management tools to organize information on language assistance services. Alternative methods included invoices and internal notes.

**FIGURE 15. METHODS OF MAINTAINING DATA ON LANGUAGE ASSISTANCE SERVICES**



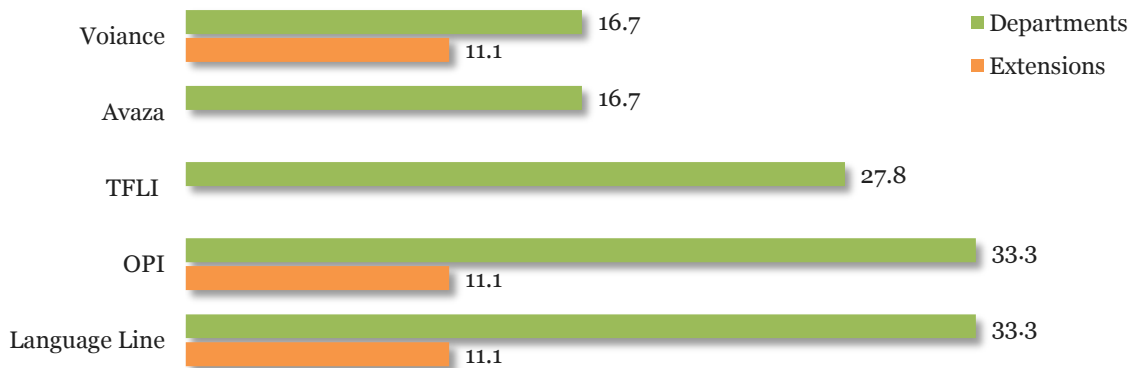
We next asked specifically about the provision and availability of *interpretation* services. Interpretation is the *oral* conversion of information from one language to another. As shown in Figure 16, less than a third of both departments and extensions indicated that they provide interpretation services to LEP, Deaf, and hard of hearing constituents (25% and 31%, respectively), but a greater share of departments (60%) reported providing their staff with information about accessing interpreters. This was not the case for extensions, of which only 29% provided staff with this information. Additionally, 45% of departments and 26% of extensions reported having existing contracts with language assistance providers.

**FIGURE 16. INTERPRETATION SERVICES IN DEPARTMENTS AND EXTENSIONS**



Metro has several contracts for interpretation services. Voiance and Optimal Phone Interpretation (OPI) are the two Metro contracts for telephone interpretation. AllWorld Language Consultants has a contract with Metro to provide on-site interpretation. However, the survey revealed that Metro departments and extensions use a number of different agencies for language assistance and suggest that there is little awareness around the existing Metro contracts. Figure 17 below shows the most common providers that departments and extensions report using.

**FIGURE 17. MOST COMMON LANGUAGE ASSISTANCE PROVIDERS AMONG METRO DEPTS AND EXTENSIONS**



Among Metro departments that reported having contracts with language assistance providers, a third each indicated that they had a contract with OPI and Language Line. Another 28% stated that they had a contract with the Tennessee Foreign Language Institute (TFLI), while 17% of departments indicated they had a contract with Voiance. A final 17% have contracts with Avaza. Few extensions have contracts with language assistance providers – 11% each report a contract with Voiance, OPI, and Language Line.

Language assistance providers are not the only means by which departments receive interpretation help.

**FIGURE 18. PERCENT OF DEPARTMENTS AND EXTENSIONS THAT ALLOW OR ASK LINGUISTIC MINORITIES TO BRING OWN INTERPRETER**

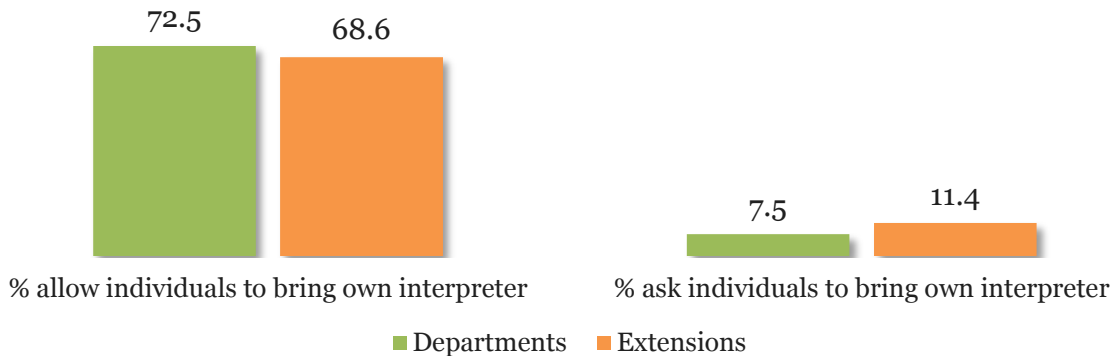
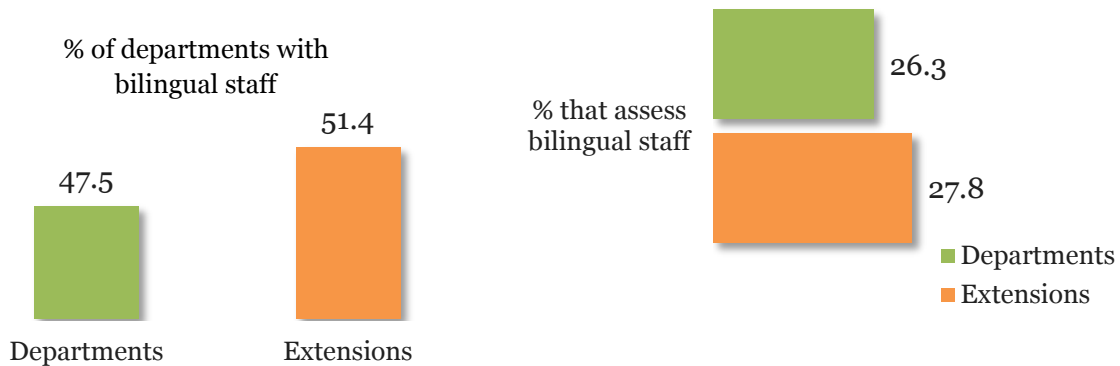


Figure 18 shows that the majority of both departments and extensions allow constituents to bring their own interpreters (73% and 69%, respectively). However, a much smaller share explicitly *ask* constituents to bring their own interpreter- just 8% of departments and 11% of extensions. We distinguish between allowing and asking, since asking a constituent to provide their own interpreter is a violation of both Title VI and ADA provisions.



Additionally, many departments and extensions rely on their staff for interpretation. Recall that 47.5% of departments and 51.4% of extensions indicated that they have bilingual staff. Fewer, however, have an assessment process for those who would act as interpreters or translators. Language fluency assessments are often encouraged for bilingual staff, particularly in fields that utilize specialized language such as in the medical or legal fields. Only 26% of departments and 28% of extensions with bilingual staff indicated they have an assessment process of this sort. This is shown in Figure 19.

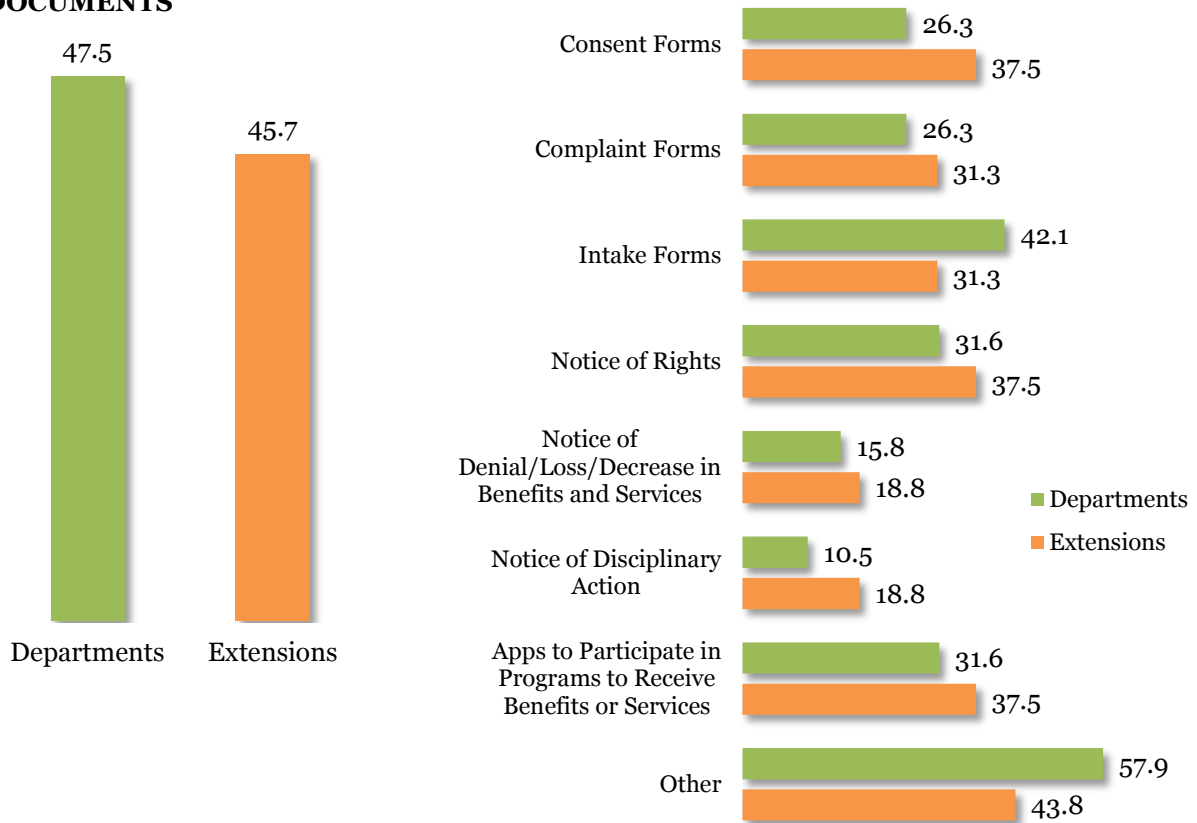
**FIGURE 19. PERCENT OF DEPARTMENTS AND EXTENSIONS WITH BILINGUAL STAFF AND WHO ASSESS STAFF**



We next turn to what departments and extensions do in terms of *translation* – the conversion of *written* information from one language to another.

Figure 20 below shows the number of departments and extensions that translate vital documents into non-English languages, as well as the type of documents that are translated. A document is one that contains information that is critical for obtaining services and/or benefits, or is required by law. This includes 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.

**FIGURE 20. PERCENT OF DEPARTMENTS AND EXTENSIONS THAT TRANSLATE VITAL DOCUMENTS**

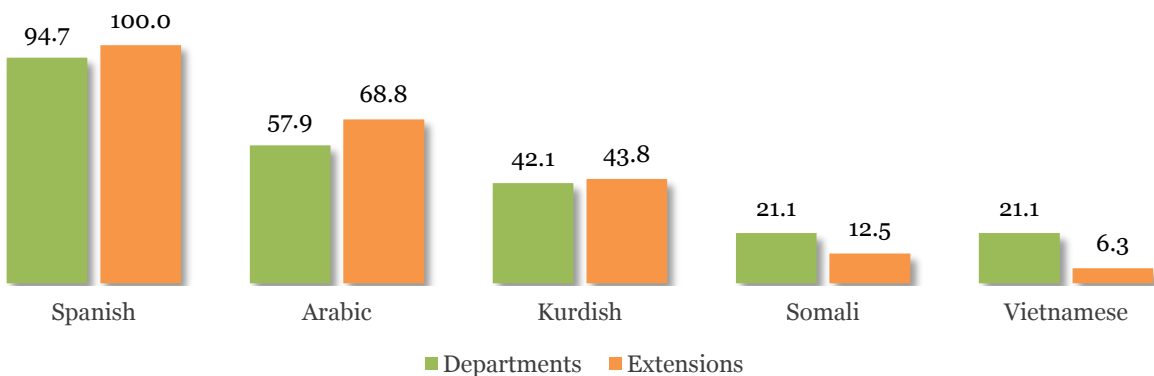


As seen in Figure 20, a little under half of departments (47.5%) and extensions (45.7%) translate vital documents into at least one of the non-English languages of the communities they serve. Of the departments that offer translations of vital documents, 26% translate consent and complaint forms, and 42% translate intake forms. Another 32% translate notice of rights, while 16% translate notice of denial, loss, and/or decrease in benefits and services. A little over 10% translate notices of disciplinary action and 32% translate applications to participate in programs to receive benefits and services. 58% of departments that offer translations translate other documents such as brochures, program guidelines, applications, and schedules.

Among the 46% of extensions that reported translating vital documents, 38% translate consent forms, while 31% translate complaint forms. Another third translate intake forms, and 38% translate notices of rights. Equal shares of extensions (19%) translate notices of denial, loss, or decrease in benefits and services and notices of disciplinary action. Another 38% translate applications to participate in programs to receive benefits or services. A final 44% translate other documents, such as posted signs, applications, and schedules. Because each department and extension determines what constitutes a vital document, it is unsurprising to see that the “Other” response category is the largest for both departments and extensions.

Figure 21 below shows, among those departments and extensions that indicated they translate vital documents, the most common languages of translation.

**FIGURE 21. PERCENT OF DEPARTMENTS AND EXTENSIONS THAT TRANSLATE INTO EACH LANGUAGE**

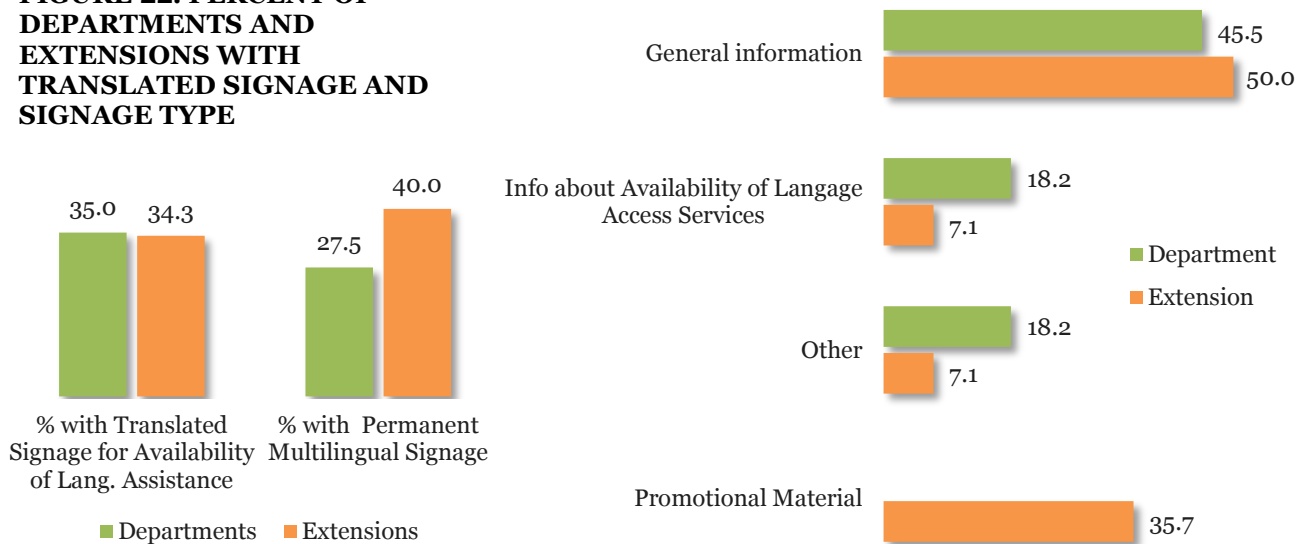


Spanish is noticeably the most common language, with 95% of departments and all extensions providing vital documents in the language. This is followed by Arabic (58% of departments, 69% of extensions), Kurdish (42% of departments, 44% of extensions), Somali (21% of departments, 13% of extensions), and Vietnamese (21% of departments, 6% of extensions). Interestingly, while Burmese was identified as one of the most frequently encountered non-English languages, just one department reported translating vital documents into the language. Of the departments surveyed, two departments translate documents into at least 10 languages – Human Resources and the Office of English Learners (Metro Nashville Public Schools).

### SIGNAGE AND MEDIA

Lastly, we asked Metro departments and extensions about other non-verbal forms of communicating with linguistic minorities. Specifically, we asked about the signage they use and any media outreach made to LEP, Deaf, and/or hard of hearing constituents. As it relates to signage, a little over a third of both departments and extensions (35% and 34%, respectively) translate signs in their offices or facilities that announce the availability of language assistance. Fewer departments, but more extensions, report having permanent multilingual signage in their office. This is shown in Figure 22.

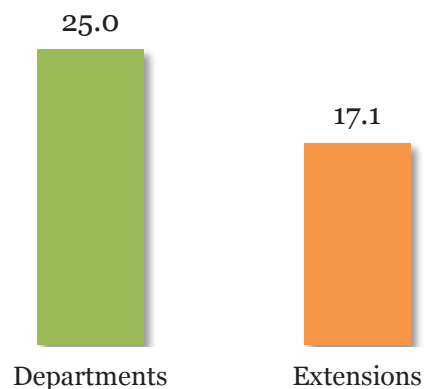
**FIGURE 22. PERCENT OF DEPARTMENTS AND EXTENSIONS WITH TRANSLATED SIGNAGE AND SIGNAGE TYPE**



When asked about the type of multilingual signage they posted, 45.5% of these departments and half of these extensions indicated that they displayed general information. Interestingly, although a third of departments and extensions had earlier reported having translated signs for the availability of language assistance, only 18.2% of departments and 7.1% of extensions who reported having multilingual signage also reported that their multilingual signage displayed information about the availability of language access services. Additionally, nearly 36% of extensions displayed promotional material, though no department reported doing so. Other types of signage reported by extensions included information about citizenship, Title VI, and federal posters.

Lastly, we asked departments and extensions if they advertise on non-English media. Figure 23 shows that a quarter of departments and 17% of extensions reported advertising in languages other than English. This includes on television, radio, newspaper, and websites.

**FIGURE 23. PERCENT OF DEPARTMENTS AND EXTENSIONS THAT ADVERTISE ON NON-ENGLISH MEDIA**



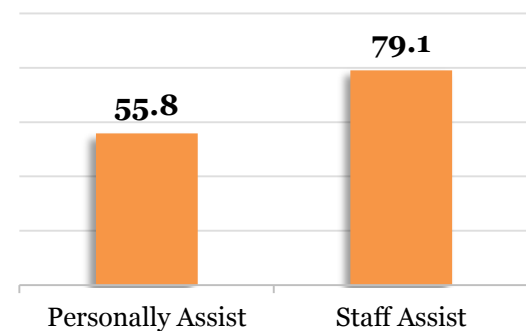
## COMMUNITY SURVEY

A second survey was sent to community leaders and direct service agencies that work with limited English proficient, Deaf, and hard of hearing communities. Between February and March 2016, the survey was distributed via web link on a number of different platforms: social media outlets (Facebook and Twitter), email, and various list serves. We also utilized snowball sampling, asking community members for names of individuals and organizations that could provide valuable input and encouraging them to reach out their contacts as well. The survey was available in English and Spanish. The survey questions are included as Appendix 2.

Forty-four individuals completed the survey, with 27 organizations represented. These included non-profits that provided social and financial assistance to refugee populations, immigrant-serving institutions, health agencies, educational and legal resources, interpretation assistance, and small business owners. For reasons of confidentiality and at the request of some respondents, names of respondents and their organizations are not listed.

The survey asked about the Metro departments with which community members most frequently interact, the nature of these interactions, and where there may be obstacles to meaningful access. We first wanted to learn about respondents and their organizations. We asked them whether they or their staff directly assist community members or clients in their interactions with Metro departments and in what ways. As seen in Figure 1, nearly 56% of respondents indicated that they personally assist community members in their interactions with Metro. About 80% reported that other members of their staff assist community members with Metro departments.

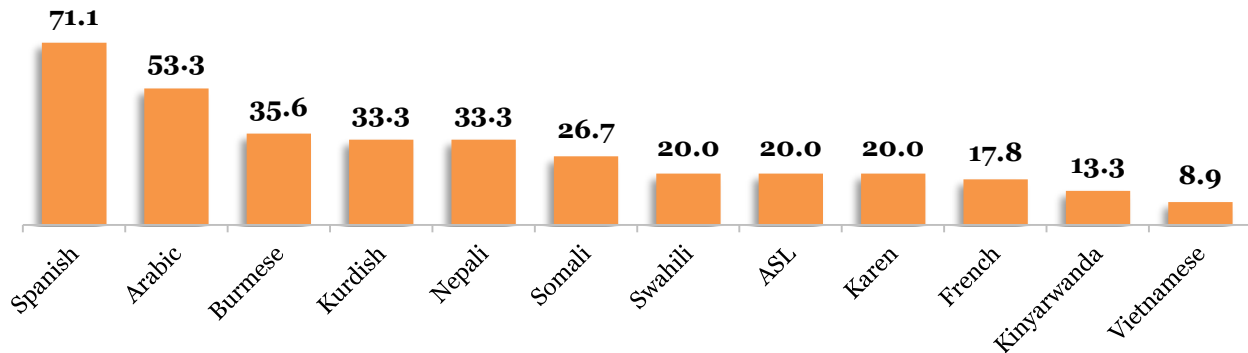
**FIGURE 24. RESPONDENT AND ORGANIZATION ASSISTANCE WITH METRO DEPARTMENTS**



Respondents and their staff assist community members and clients in their interactions with Metro departments in a variety of ways. As one respondent put it, they often “bridge the community to the public resources and departments” – this includes providing referrals to different Metro departments, advocating on their clients’ behalf within the courts and in schools, acting as interpreters or translators themselves, and assisting them in getting things like a library card or bus pass.

Respondents were then asked to list the 10 most common languages spoken by the communities they serve. A total of 43 languages were reported (See Appendix 3 for a full list). Figure 25 shows the most common languages among respondents and the percentage of respondents who included that language on their list.

**FIGURE 25. MOST COMMON LANGUAGES SPOKEN BY COMMUNITIES SERVED BY RESPONDENTS**



Nearly three-quarters (71%) of all respondents indicated that they serve Spanish-speaking community members. About half of respondents (53%) listed Arabic, while about a third each indicated Burmese (36%), Kurdish (33%), and Nepali (33%). A little over a quarter of respondents listed Somali, while a fifth each (20%) reported Swahili, American Sign Language (ASL), and Karen as a common language. Nearly 18% of respondents listed French as a common language, with 13% listing Kinyarwanda and 9% listing Vietnamese.

#### INTERACTIONS WITH DEPARTMENTS

Community respondents were then asked to list the Metro departments with which their community and/or clients most frequently interact. A list of Metro departments was provided alongside this question (see Appendix 2, Question 3). Table 2 below shows the Metro departments with the most frequent community interaction.

**TABLE 1. METRO DEPARTMENTS WITH GREATEST COMMUNITY INTERACTION**

Library	40.0%	County Clerk	13.3%
Public Health	40.0%	Public Defender	13.3%
Social Services	40.0%	Parks and Recreation	13.3%
Police	29.6%	State Trials	11.1%
Juvenile Courts	24.4%	General Sessions Court	11.1%
Metro Human Relations Commission	17.8%	Arts Commission	11.1%
Metro Action Commission	17.8%	Election Commission	8.9%
Circuit Court	15.6%	District Attorney General	8.9%
Criminal Court	13.3%	Fire	6.7%

The Nashville Public Library, Public Health, and Social Services appear to have the greatest community contact, with 40% of survey respondents reporting frequent interactions. This is followed by the Police Department, with nearly 30% of respondents. The courts are well represented on this list with Juvenile Court the most common at almost a quarter (24%) of respondents compared to Circuit Court (15.6%), Criminal Court (13.3%), State Trials Court (11.1%), and General Sessions Court (11.1%). The Metro Human Relations Commission and Metro Action Commission made the list for 17.8% of respondents. The County Clerk, Public Defender, and Parks and Recreation each made the list for 13% of respondents. The Arts Commission saw frequent interactions with 11% of respondents, and the Election Commission and District Attorney General each made the list for about 9% of respondents. Finally, the Fire Department was listed as a frequently-encountered department for just under 7% of respondents.

Additionally, “semi-autonomous” Metro agencies<sup>3</sup> and non-Metro departments were reported. These include Metro Transit Authority (MTA) and Metro Development and Housing Agency (MDHA). Programs under Metro departments were also listed – El Protector (MNPD), Library Services for the Deaf and Hard of Hearing (Public Library), English Learners Office (MNPS). A full list of these departments (semi-Metro and non-Metro) and programs reported by respondents is included in Appendix 4.

Respondents were next asked to rate their communities’ experience with Metro departments on four different factors: (1) How easy are the interactions? (2) How likely is it that someone speaks the same language they do? (3) How likely is it that translation/interpretation services are available? (4) How easy is it to gain access to services if they do not speak English or if they use ASL? Respondents then ranked their experience from 1-5, with 1 being not at all easy/very unlikely and 5 being always easy/very likely. Respondents also had the options of “Don’t Know” or “Not Applicable.” Table 2 shows the average ratings <sup>4</sup> for each of the four factors, along with the number of respondents who provided a rating in parentheses.<sup>5</sup> The highest possible average is 5 and the lowest is 1.

**TABLE 2. AVERAGE RATINGS FOR EXPERIENCE FACTORS**

How easy are the interactions?	3.0 (164)
How likely is it that someone speaks the same language they do?	2.1 (131)
How likely is it that translation/interpretation services are available?	2.8 (137)
How easy is it to gain access to services if they do not speak English or if they use ASL?	3.0 (97)

<sup>3</sup> Some agencies, boards, and commissions are “semi-autonomous” by nature of their external (often Federal) funding sources. Those semi-autonomous agencies, boards, and commissions that are supported primarily by the Metro budget were included in our analysis as Metro departments.

<sup>4</sup> To produce the averages, all ratings for each factor were summed then divided by the total number of ratings.

<sup>5</sup> Recall that respondents could provide ratings for multiple departments. For example, one respondent can provide ratings for the Metro Action Commission, the Nashville Public Library, and Public Works. Therefore, the number of ratings is likely to be greater than the number of survey respondents.

Metro departments rate higher among respondents when it comes to two factors: (1) ease in interactions and (2) gaining access to services if constituents do not speak English or if they use ASL. Each of these factors had an average rating of 3 out of 5. Respondents gave the factors related to language assistance lower ratings. Likelihood that translation/interpretation services are available received an average rating of 2.8, while likelihood that someone speaks the same language as LEP, Deaf, and hard of hearing community member received an average rating of 2.1. As such, the ease in interactions and access were rated higher than the likelihood of finding language assistance.

Table 3 shows each department and their average ratings on the four factors. Department ratings that score at or above overall factor average<sup>6</sup> are listed in bold. Departments that scored at or above overall factor average across all four factors have their names listed in bold. Four department names are listed in bold – Emergency Communications, Fire, Juvenile Court, and Nashville Public Library. According to respondent ratings, within these departments interactions are relatively easy, there is higher likelihood that someone speaks the same language as community members, there is higher likelihood that translation/interpretation services are available, and it is relatively easy for LEP, Deaf, and hard of hearing respondents to gain access to services.

Departments with ratings at or above average across three factors are the County Clerk, General Sessions Court, Human Relations Commission, Metro Action Commission, Parks and Recreation, the Public Defender, Public Health, Social Services, and Water Services.

Note that the number of respondents across factors often changes. There are two reasons for this: (1) respondents provided ratings for a department on some factors, while skipping others; (2) respondents selected “Don’t Know” or “Not Applicable” for some factors. In some cases, departments only had one or two ratings

Indeed, the majority of departments that scored consistently below average had just one or two respondents provide a rating for each of the four factors. They were also departments that respondents did not report having very much contact with. We caution against overconfidence in these particular ratings, as confidence is tied to the number of ratings. The greater the number of ratings, the higher the confidence that they accurately reflect community viewpoints.

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<sup>6</sup> Recall the overall factor averages are listed in Table 2.



**TABLE 3. DEPARTMENT RATINGS ACCORDING TO COMMUNITY RESPONDENTS**

	How easy are the interactions?	How likely is it that someone speaks the same language they do?	How likely is it that translation/ interpretation services are available?	How easy is it to gain access to services if they do not speak English or if they use ASL?
Agricultural Extension	<b>3.2 (4)</b>	2.0 (2)	2.0 (2)	2.0 (1)
Arts Commission	<b>3.8 (8)</b>	1.7 (6)	2.5 (4)	2.3 (3)
Assessor of Property	2.7 (3)	2.0 (1)	1.0 (1)	2.0 (1)
Auditorium Commission	2.0 (1)	2.0 (1)	<b>3.0 (2)</b>	<b>3.5 (2)</b>
Beer Board	2.0 (1)	1.0 (2)	1.0 (1)	1.0 (1)
Circuit Court	2.8 (4)	1.0 (4)	<b>3.6 (7)</b>	<b>3.6 (5)</b>
Codes Administration	1.0 (2)	1.0 (2)	1.0 (1)	2.0 (1)
Convention Center	1.7 (3)	<b>3.0 (1)</b>	1.7 (3)	2.5 (2)
County Clerk	<b>3.4 (7)</b>	1.6 (5)	<b>3.2 (5)</b>	<b>3.3 (3)</b>
Criminal Court	2.6 (7)	1.2 (5)	2.7 (6)	2.6 (5)
District Attorney	2.0 (5)	1.5 (4)	<b>3.8 (4)</b>	<b>3.0 (3)</b>
Election Commission	2.7 (3)	1.0 (3)	1.0 (1)	2.0 (1)
<b>Emergency Communications</b>	<b>3.0 (5)</b>	<b>2.3 (3)</b>	<b>3.0 (6)</b>	<b>3.3 (3)</b>
Farmer's Market	<b>3.5 (2)</b>	1.0 (2)	1.7 (3)	2.0 (1)
Finance	1.0 (1)	1.0 (1)	1.5 (2)	2.0 (2)
<b>Fire</b>	<b>3.0 (5)</b>	<b>2.8 (4)</b>	<b>3.0 (2)</b>	<b>4.0 (3)</b>
General Sessions	<b>3.3 (6)</b>	2.0 (6)	<b>3.3 (4)</b>	<b>3.8 (4)</b>
Historical Commission	NA	1.0 (3)	1.0 (1)	1.0 (1)
Human Relations Commission	<b>3.8 (4)</b>	<b>2.8 (4)</b>	<b>3.5 (4)</b>	2.7 (3)
Justice Integration Systems	2.5 (2)	1.0 (1)	1.0 (1)	2.0 (1)
<b>Juvenile Court</b>	<b>3.1 (7)</b>	<b>2.7 (6)</b>	<b>3.6 (7)</b>	<b>3.2 (6)</b>
Metro Action Commission	<b>3.0 (10)</b>	1.9 (7)	<b>3.5 (6)</b>	<b>3.0 (4)</b>
Nashville Career Adv. Center	<b>3.0 (4)</b>	<b>4.0 (1)</b>	2.0 (1)	<b>3.0 (1)</b>
<b>Nashville Public Library</b>	<b>4.2 (11)</b>	<b>3.8 (8)</b>	<b>3.3 (10)</b>	<b>3.7 (7)</b>
Trustee	2.3 (3)	1.0 (2)	2.7 (3)	<b>3.0 (2)</b>
Parks and Recreation	<b>3.5 (6)</b>	<b>2.3 (3)</b>	1.8 (4)	<b>3.0 (3)</b>
Planning	1.0 (1)	1.0 (1)	2.0 (2)	2.0 (1)
Police	2.8 (9)	<b>2.7 (9)</b>	2.7 (7)	<b>3.2 (6)</b>
Public Defender	2.8 (4)	<b>2.4 (5)</b>	<b>3.2 (5)</b>	<b>3.8 (4)</b>
Public Health	<b>3.3 (6)</b>	<b>2.8 (6)</b>	<b>3.4 (5)</b>	2.5 (2)
Public Works	2.5 (2)	1.0 (1)	2.0 (2)	2.0 (1)
Register of Deeds	2.5 (2)	1.0 (1)	1.3 (4)	2.0 (2)
Sheriff	2.8 (6)	<b>2.8 (5)</b>	2.7 (3)	<b>3.0 (1)</b>
Social Services	2.5 (11)	<b>2.4 (8)</b>	<b>3.6 (8)</b>	<b>3.2 (5)</b>
Soil and Water Conservation	1.0 (1)	1.0 (1)	1.0 (1)	2.0 (1)
State Trial Courts	<b>3.0 (4)</b>	2.0 (4)	<b>3.4 (5)</b>	<b>4.0 (4)</b>
Water Services	<b>3.5 (4)</b>	<b>2.3 (3)</b>	<b>3.3 (4)</b>	2.0 (1)

Note: Ratings in bold are at or above average (see Table 3). Departments in bold scored at or above average on all four factors.

## QUALITY OF DEPARTMENT SERVICE

In addition to providing department ratings, respondents were asked open-ended questions about department service.<sup>7</sup> When asked which Metro departments consistently provide good services to LEP, Deaf, and/or hard of hearing communities, respondents listed several: Circuit Court, MNPS, Social Services, Public Health, County Clerk, Public Defender, General Sessions Court, Juvenile Court, Trial Court, Arts Commission, Police, Nashville Public Library. One respondent provided an example of good service, “Circuit Court. If there is a need, the court will usually secure the necessary services. I need a Tygringa [sic] interpreter and they searched until they found one and retained his services throughout a 5 day trial over the course of 1 year.” Another wrote, “Police work to educate new officers regularly and our ed and outreach department is invited to be part of it.” Some expressed some difficulty in naming departments that provided consistently good service. For example, one respondent wrote, “I wouldn’t say any Metro department is especially consistent about providing good services to people with hearing loss” while another echoed this sentiment, explaining “I have not experienced consistency in translation/interpreting services within my interactions with metro services.”

**“If there is a need, the [Circuit] court will usually secure the necessary services. I need a [Tigrinya] interpreter and they searched until they found one...”**

When asked about the Metro departments where translation/interpretation services are essential but not yet adequately provided, responses varied. Many listed specific departments:

**“Some schools in MNPS have large populations of students and parents with LEP with little to no access to translators...I had students there last year who were being pulled to translate for their friends.”**

General Sessions Court, Clerk’s Office, Social Services, Metro Nashville Transit Authority, Police, Emergency, Fire, Parks, Metro Action Commission, Library, Metro Arts Commission, and Metro Nashville Public Schools. Several respondents pointed to MNPS specifically as a department needing additional services, explaining “MNPS needs more translators for the schools which have a large ESL population” and “Some schools in MNPS have large populations of students and parents with LEP with little to no access to translators...I had students there last year who were being pulled to translate for their friends.” Others listed State Departments or were not specific about which department (Metro or State) they were referring to. This included: Legal services, health, DHS, DVS, courts, mental health, jails, and finance. A handful of

respondents wrote that they did not know.

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<sup>7</sup> Note: The response rate for these open-ended questions was low (56%). All responses to these questions are included in the Appendix.

## ACCESS: BARRIERS AND OBSTACLES

**“School translators and community partners will continue to be some of the most important referral sources for LEP individuals trying to access government services.”**

Respondents were then asked how their communities typically find out about government services. By far, the most common response was “word of mouth,” likely from friends and family. Case managers and community agencies appear to play a significant role in getting information to their clients, as do schools. One respondent listed the 2-1-1 Helpline, a program through the United Way of Metropolitan Nashville, and several others listed websites, newspapers, and social media.

**Communities commonly find out about government services through word of mouth.**

**Linguistic minorities often rely upon children, friends, and other family members to act as interpreters.**

We next asked about the strategies community members use to overcome language barriers during interactions with Metro Departments. Respondents indicated that their clients or community members often rely upon children, friends, and other family members to act as interpreters. In addition, some community organizations take a hands-on role in helping their clients through these interactions, as in the case of one respondent who explained, “We arrange for our meeting times to involve metro departments so they have interpretive services and someone to assist them with paperwork and comprehension of services.” Other respondents explained that their community members or clients request on-site interpretation services.

**“It is important to not just know the language but also be aware of cultural barriers that might be in the way of accessing services. Metro employees should be educated on responding to other cultures and languages in a sensitive manner.”**

When asked about other obstacles that keep communities from accessing Metro services, respondents were largely concerned with transportation, cultural awareness, and a lack of education from both Metro departments and from constituents themselves. One respondent wrote that her South Asian families “need help navigating MTA so they can at least get to the library.” Another felt that there is a “lack of knowledge and cultural competency by Metro staff.” This sentiment was echoed by a respondent who suggested that when Metro departments are not “well educated in the ADA or the spirit of the ADA in making things more accessible for the community,” it was an obstacle for the community.

We offered respondents a final opportunity for additional comments. Those who did respond offered their help and provided suggestions for improving services. Appendix 5 shows these comments.

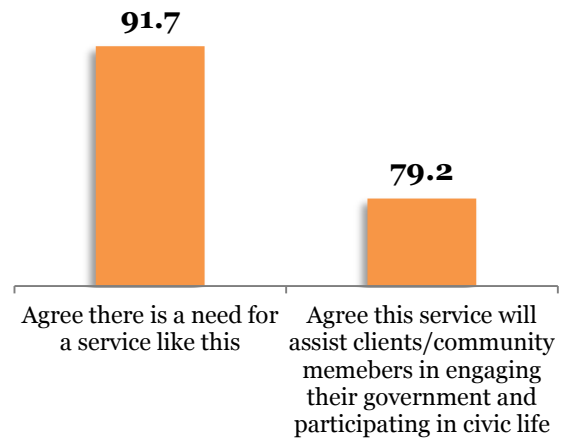
## IMPROVING ACCESS

Finally, we gauged response to a few ideas for improving services to LEP constituents. The first was about multilingual signage within Metro facilities. Almost all respondents (95.8%) agreed that multilingual signage in Metro facilities would be useful for the communities they serve.

**“I think signage in multiple languages is incredibly important! It not only helps people to understand rules and instructions, but it also creates a more inviting and welcoming environment.”**

The second idea was a telephone platform on which interpreters record transcripts for Metro forms, explaining what the forms are about and how to fill them out, in the languages most widely-spoken in Nashville. Nearly 92% of them agreed that there is a need for a service like this, while just under 80% agreed that this service will assist clients/community members in engaging their government and participating in civic life. This suggests that respondents see the instrumental value in a telephone platform, but fewer see it being useful as a civic engagement tool.

**FIGURE 26. TELEPHONE PLATFORM**



## COMMUNITY FOCUS GROUPS

For more of the community perspective, we also conducted 7 focus groups with a total of 38 people. These focus groups were held between June 2016 and September 2016. Six of the groups involved individuals who were part of or worked directly with the immigrant and refugee population. The seventh was conducted with the assistance of a local non-profit and focused on the experiences of the Deaf and hard of hearing.

Participants were asked to respond to questions designed to elicit a deeper conversation about their expectations for Metro government and their experiences in accessing services. The focus groups were facilitated by Samantha Perez, Director of Policy and Research, and several of them were also assisted by Vanderbilt graduate students from the Department of Sociology. Six of the focus groups were held at Casa Azafrán, a community center located in the Southeast corridor of Nashville, while the seventh was held at Bridges for the Deaf and Hard of Hearing. Participants were compensated for their time with either lunch or dinner, depending on the time of the focus group.

All participants received a consent form and were guided through its various sections. They were then asked to sign, if they felt comfortable doing so. At the start of every focus group, participants were explicitly asked whether they gave permission to be recorded, with the understanding that if at least one person in the group was uncomfortable, the recorder would not be used. A copy of the Consent Form and the list of questions used during the focus groups are included as Appendix 6.

Demographic information for participants in the immigrant and refugee focus groups is shown in Figures 27A-H. Half of participants (57.1%) identified as female, while 42.9% identified as male and 3.5% did not report a gender. As it pertains to race and ethnicity, 31.0% of participants were white, followed by 27.6% black, 24.1% Hispanic, and 17.4% Asian. In terms of age, those 25-35 are overrepresented, making up 51.7% of participants. Participants 46-55 represented 17.2% of participants, those 36-45 years of age were 13.8%, and those 56 and older making up 10.3%. The smallest group was 18-24 at 6.9% of all participants.

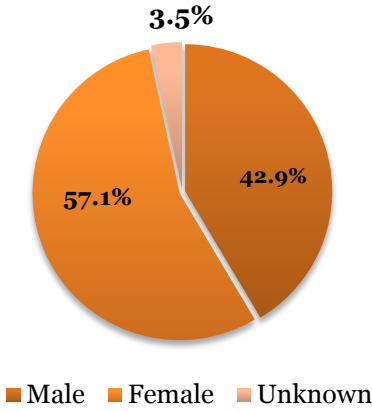
Close to 85% of focus group participants were born in another country, while the other 15% were native born. Nearly 34.6% of participants came to the U.S. with an immigrant visa, 26.9% were refugees, 15.4% came with other types of immigrant statuses, 3.9% were asylees, and another 3.9% arrived to the U.S. on non-immigrant visas. Participants represented 14 different countries – Bhutan, Colombia, Dominican Republic, Ethiopia, Iraq/Kurdistan, Japan, Mexico, Nigeria, Rwanda, Somalia, Sudan, United States, Venezuela, and Vietnam.

The majority of participants (46.4%) had been in Nashville for more than 11 years. Nearly a third (32.1%) had been in the city 6-10 years, while 21.4% had been in Nashville 5 or fewer years.

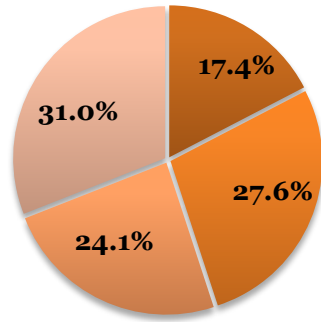
While 19.2% of participants spoke only one language (English), the remainder spoke two or more languages, with half speaking 2 languages, 19.2% speaking three languages, and 11.5% speaking 4 languages. Together, participants spoke a total of 18 languages – Amharic, Arabic, Chinese, Dinka, English, French, German, Hausa, Hindi, Japanese, Kinyarwanda, Malay, Nepali, Nuer, Somali, Spanish, Tigrigna, and Vietnamese.

**FIGURE 27A-H. DEMOGRAPHIC PROFILE OF FOCUS GROUP PARTICIPANTS**

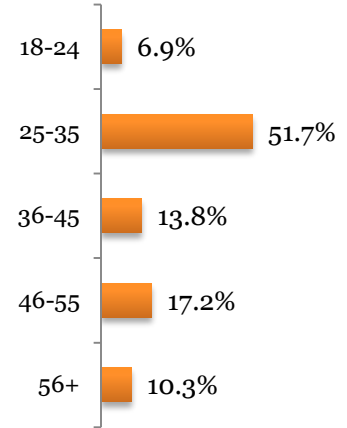
**A. Gender**



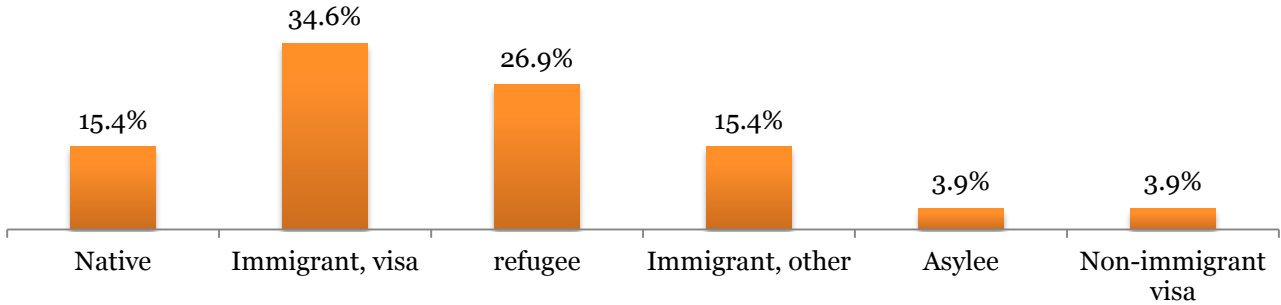
**B. Race/Ethnicity**



**C. Age Category**



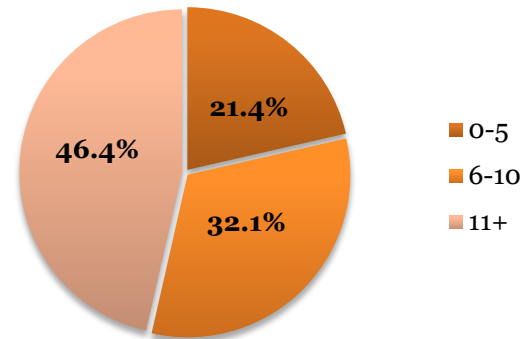
**D. Immigration Status on Arrival**



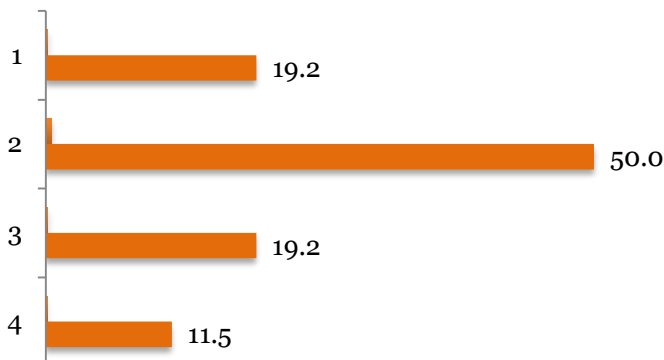
**E. Country of Origin**

- |                    |               |
|--------------------|---------------|
| Bhutan             | Nigeria       |
| Colombia           | Rwanda        |
| Dominican Republic | Somalia       |
| Ethiopia           | Sudan         |
| Iraq/Kurdistan     | United States |
| Japan              | Venezuela     |
| Mexico             | Vietnam       |

**F. Years in Nashville**



**G. Number of Languages Spoken**



The focus groups revealed that while there are some commonalities between immigrant and refugee communities and the Deaf and hard-of-hearing community, there were also distinct challenges. As such, we first report on what participants shared about the immigrant and refugee communities, then follow with findings from the focus group with the Deaf and hard-of-hearing community

## IMMIGRANT AND REFUGEE COMMUNITIES

### WHAT SHOULD THE ROLE OF METRO BE?

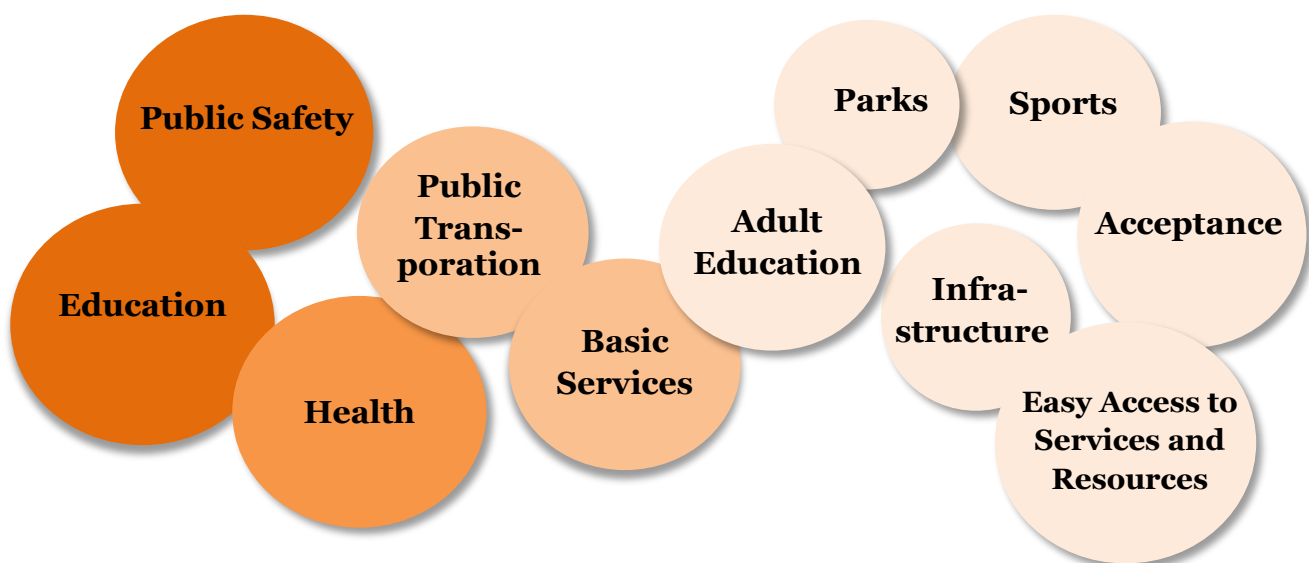
**“I think the most important thing is connection to the people who are in need of their services”**

**(May 31, 2016[a])**

Discussions began with a question about what the role of Metro government should be. An unexpected but consistent theme to emerge from the focus groups was about the difficulty many people (native and foreign-born alike) have in distinguishing between the roles and responsibilities of the different levels of government— federal, state, and Metro. As one participant put it, “The thing is, we don't know what Metro does, so that's the problem [...] you don't know when we have problem, we don't know where to ask for help” (July 13, 2016). This was evident in the number of non-Metro departments and agencies that were mentioned during focus groups.

Nonetheless, participants across all focus groups were able to provide a variety of responses about what a city government should provide to its constituents. These are shown in Figure 28.

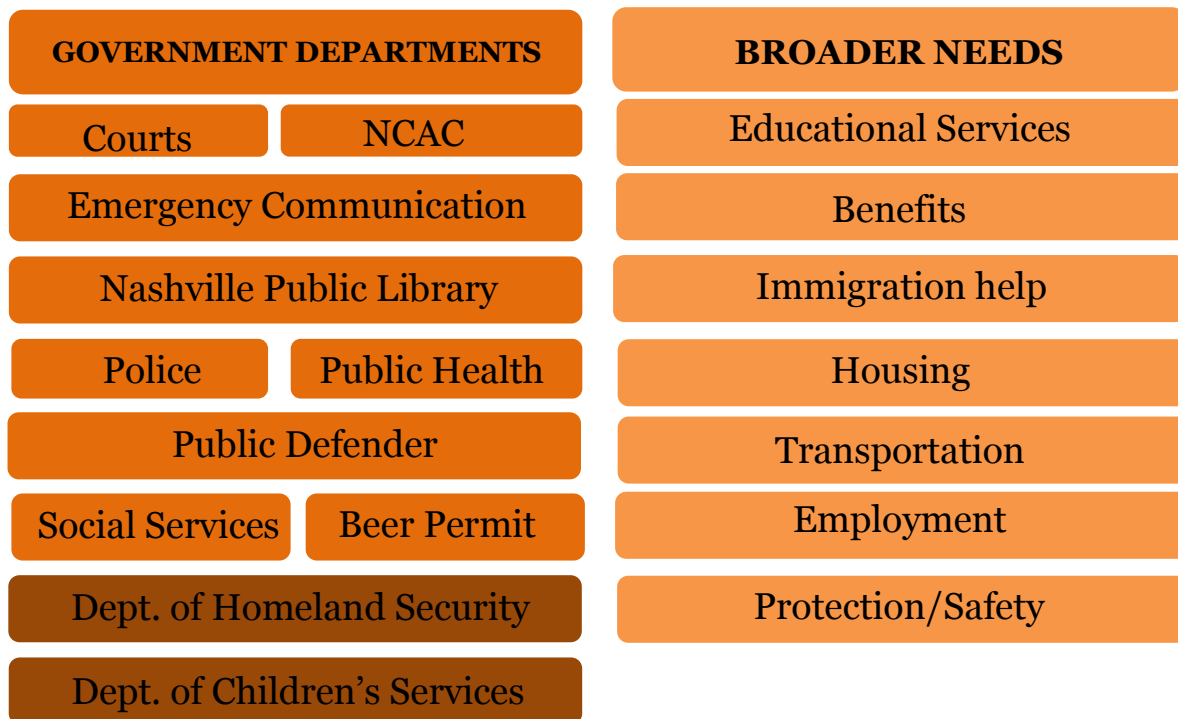
**FIGURE 28. WHAT METRO GOVERNMENT SHOULD PROVIDE (PARTICIPANT RESPONSES)**



Participant responses are shown in order of frequency, with the darkest color indicating the most common responses and the lightest color indicating the least common. Public safety (including a police force) and education were the government services that participants across focus groups most commonly listed as vital. This was followed by health, then public transportation and basic services (like water). Though less common, participants also indicated that a city government should provide adult education, parks, sports, infrastructure, and easy access to services and resources. One participant added that they expected acceptance from their government.

Participants were also asked about the services most in demand in their communities. Some community members listed government (Metro and non-Metro) departments, while others suggested broader needs and concerns. These are shown in Figure 29.

**FIGURE 29. SERVICES MOST IN DEMAND (PARTICIPANT RESPONSES)**



Focus group participants indicated that the Metro departments most in demand are Courts, Nashville Career Advancement Center, Emergency Communication, Nashville Public Library, Police, Public Health, Social Services, Beer Permit board, and Public Defender. They also listed the Department of Homeland Security and the Department of Children's Services –federal and state-level departments. Other participants addressed broader needs in their communities, pointing to the need for educational services, benefits, immigration help, housing, transportation, employment, and protection and safety.



## HOW DO COMMUNITIES LEARN ABOUT METRO GOVERNMENT?

We next asked about where Limited English Proficient communities go for information about Metro government. Consistent with the results of the community survey (discussed in the previous section), participants agreed that their community members or clients often find out about Metro services through word of mouth – from neighbors, family, or friends. According to participants, this was not always the most effective strategy for getting accurate information. One participant, a case manager, laughed when remembering clients who came to her after having taken the misinformed advice of friends:

*Facilitator: Is it typically bad information?*

*Participant: Usually, because no two situations are the same, unfortunately, so they always say, well, my neighbor did this or my friend did this, and then their situation is slightly different, so then they don't qualify or there's a problem, and then they can't get what they need, so then they come to us and complain after. (May 25, 2016)*

Participants listed a number of refugee and immigrant serving organizations— including World Relief, Catholic Charities, NICE, and Cornerstone—where case workers are an important source of information for the communities they serve. Some case workers participating in the focus groups admitted to turning their phone off at night sometimes to avoid getting called more often than they already do. They explained that they are often the only person refugees feel they can turn to when they first arrive in Nashville and so they often receive a myriad of questions related to their integration into civil life, including accessing and applying for Metro services.

The media is another way that community members may learn about Metro services. As it pertains specifically to the Spanish-speaking community, participants found the radio an effective means of relaying information, particularly because “a lot of people, especially people who are working and can't be watching TV or they can't be watching the news or whatever and we don't have a local Spanish, or Arabic, or any other [TV] channels. We just have English and that's it, but the radio station, I know we have a Spanish [one].” (May 31, 2016[b])

Participants themselves utilize Spanish-language media when doing outreach.

*A lot of times when I ask clients, I'm like how do you find out about this? Oh, I hear on the radio, or you know things like that. So to me and actually when we're going to have an event or when we are running low on clients and we need more clients, all I have to do is (laughs) just call the radio station saying go there, talk for 30 minutes then clients will start coming. (May 31, 2016[b])*

On top of relaying information, radio stations also distribute information off the air, through festivals and events that they put on for the community.

*So the community that I interact [with] a lot, I think they get their information from radio stations [...] I mean, they listen to that radio a lot, as well as the fairs, and the other events that those radios are always organizing, so they get organizations to go and they will pass information, so that's how I think they find out. Usually, because we*

*have a newsletter too, e-letter, internet, and when I ask them, oh, you want to sign up for the e-mail, sometimes they don't have e-mails. (June 6, 2016)*

Spanish-language radio stations are important conduits for bringing the community together and for bridging them to outside organizations. The radio also addresses another communication gap that may exist for many constituents: lack of reliable and easy access to email and the internet. Thus, the radio fills in when more modern forms of communication prove ineffective for reaching certain groups.

However, others expressed enthusiastic support for social media as a good tactic for distributing information to immigrant and refugee communities “provided we are strategic” (May 31, 2016[a]). One respondent in particular felt strongly about the potential of social media:

*Social media, I think, is a very powerful tool and I believe we haven't even---I believe that we could do a better job by developing a strategic communication plan targeting the various groups because otherwise we have [social media] at our disposal, which is a valuable tool, but [...] it's not really being focused in a long term strategic plan. (May 31, 2016[a])*

Participants also listed other possible sources of information, including places of worship and other Spanish-language media channels (TV, newspaper) that sometimes include community announcements. One participant pointed to the call outs that Metro Nashville Public Schools (MNPS) does to distribute information as a best practice.

#### FINDING HELP IN METRO DEPARTMENTS

During the focus groups, participants were provided with a list of Metro departments to help them recall those with which they have frequent or notable interactions. Among the departments where it was “easier than other places” for community members to get help if they do not speak English, the library, community centers, and those tied to the criminal justice system seem to be the most common responses, albeit not without some room for improvement. For the purposes of this study, MNPS was not included as a Metro department but nonetheless was frequently listed as a place where it was relatively easy to find help because of the availability of interpreters.

According to several participants, the library is a department that seems to make a concerted effort to work with immigrants and refugees. As one respondent put it:

*[the library] offers a lot of services to immigrants, and/or they have ways to refer people, and so even if -- like I don't speak any other languages, but somehow I can figure out what people need, and it feels like the library personnel, they're trying to figure things out, you know? (May 31, 2016[b])*

Even if language assistance is not readily available to LEPs, the library appears to be a place that can locate help and tries to “figure things out,” something appreciated by participants. Others noted that the library is consistent in its efforts to include immigrant and refugees in their programming. A participant offered their perspective:

*I mentioned Nashville Public Library, I think they have great programs, and they always go out there and try to get to the community [...] you know, [they're] really trying to make the community participate in all of the events, and all the activities that they have. (June 2, 2016)*

Not only does the library help patrons once they are inside the library, participants also note that they “try to get to the community.” There were some caveats, however. One participant shared a story that illustrates some limitations they see with the library:

**“The libraries and community centers are really -- especially the libraries, I mean, it's not just checking out books anymore. It's all kinds of stuff, and so that's kind of become the center of a lot of communities.”**

**(May 31, 2016[b])**

*I went to [the main branch of the] Nashville library, took my parents there. They just came here from Mexico for the first time. They just became legal permanent residents. So one of our tasks was to go to the library and we asked for a Spanish section and they don't have one. [...] which is funny, because in the Hermitage Library, which I usually take my son there, there is a very small Spanish section, but they do have one [...] It's kind of sad, because you want people to read. You want people to get educated, but then we don't give them access to it, you know? (May 31, 2016[b])*

Although the participant knows there is a Spanish section in a smaller branch of the public library, they expressed some disappointment at not finding one in the main branch. While participants give credit to the library for its outreach and the assistance it provides to LEPs, some would like to see broader opportunities for immigrant and refugee communities to find books and other materials in their primary language.

The local community centers are credited for responding to the needs of their patrons. In particular, the Coleman Community Center, located on Nolensville Road in South Nashville, was commended for its programming:

*I do work with parks and recreation for some committee I'm in [...] they do a lot of programming based on the needs of the community. I know Coleman does a great job over here hosting different things through the year because of the families that live around this area, so they do a lot of bilingual classes and other programs for the kids and the families, so I think there's [room for] a lot of improvement there for other communities because we only touch, at least around here, like Hispanic populations, but we do have a big amount of Kurdish, and Arabic, and I'm not sure if that's part of their planning when they develop whatever programming they have, but I know they take into consideration at least part of -- the majority of the population here. (May 31, 2016[a])*

Through some committee work, this participant recognizes the efforts of the Coleman Community Center to cater its programming to the needs of families in the area. This includes bilingual programs for at least the Hispanic community; though, as the participant explained,

there is room to grow in terms of inclusive programming for the sizeable Kurdish and Arabic speaking populations that live in that part of Nashville.

Departments involved with the criminal justice system received a great deal of praise from participants. The Public Defender's office was lauded as a department that has enhanced efforts to reach out to foreign-born populations. One participant shared their experience:

*The public defender's office has, in the last year, has really tried to help the immigrant [...] population. I think they have a designated person [...] specifically for immigrants, and it's because there's been such a problem with minor charges that affect citizenship, so they have a lady that now actually, her whole job is to help (laughs) it's great. Yeah, she's awesome. (May 25, 2016)*

Participants see the addition of a person charged with assisting immigrants in the Public Defender as a welcome change and one that is evident of the office's attempts to help the immigrant population.

The District Attorney's office was also applauded for having a number of bilingual staff:

*We haven't had many issues [with the District Attorney's Office], and I know they're extremely busy, but they are good. They are good with the clients, and they have access to different languages, so I'll say they're doing a good job. [...] They have two or three people there, maybe four who speak Spanish there. Can't think if they have anybody that speaks other languages, but with my experience, and I have clients from many countries, but usually it's mostly Spanish speakers. (May 31, 2016[b])*

Though the participant cannot speak to the availability of staff who speak other languages, they are certain that the D.A.'s office has several Spanish speakers available to assist with clients. Other participants also mentioned the courts, with most agreeing that they usually had no trouble finding an interpreter for clients or community members.

However, there were other departments that participants felt were struggling to provide language assistance to LEPs. For many participants, the Nashville Police Department was perhaps better than those in other parts of Tennessee but was still lacking in one important area: bilingual officers and staff.

One participant has worked with the community in domestic violence situations and notes the challenges to access for individuals who do not speak English:

*[The police] don't have [bilingual staff] in every department, and it is so sad to see those police reports from a domestic violence situation where a kid translated [...] that's just to me, it's just a no-no. Or you know, you read those police reports where the police officer says the victim or the suspect didn't speak English so we used body language. (May 31, 2016[b])*

The participant points to two "no-nos" in interactions between police officers and LEP parties in domestic violence situations: relying upon a child to act as an interpreter and using non-verbal

communication such as body language. To the participant, these outcomes are a result of not having enough bilingual staff on hand to provide interpretation.

However, another participant saw a noticeable increase in the number of bilingual police officers:

*Participant: [The police] are doing better, but I know we are talking about Nashville, and actually I will say Nashville is the easiest city to deal with when it comes to language access, because you go outside of Nashville and it is really hard to have access to other languages, but yeah, the police department a lot of times they're struggling with language access*

*Facilitator: So what do you mean by "they're doing better"? What for you signals that there's some improvement there? What are they doing differently?*

*P: They do have more officers now that are bilingual. I have seen that. (May 31, 2016[b])*

Like many in the focus groups, this participant recognizes the improvements and efforts made by departments to serve LEP constituents, in spite of the struggles they observe. Moreover, other focus group participants mentioned the El Protector program that focuses on Hispanic outreach within the MNPd.

Given the heightened attention given to the political process this year, it is perhaps unsurprising that the Elections Commission came up in several focus groups. One participant works in a building located in South Nashville that is often the site of early voting and has made a number of observations during elections:

*Participant: it's very interesting to me that all of the people that work for the [Election Commission] team that comes here, I think, none of them speak any other language than English.*

*Facilitator: Really?*

*P: Yes. So [my colleagues and I] take time to explain to those people that come here to vote how the process goes, because they don't know[...] because you walk in, you give them their ID, and then they're ready to go, so you have like this list so you don't know what to do, but they still want to vote[...] I mean, you can't tell them who to vote with, but they don't have anyone there that can explain to them how to do it. It's just funny because they come here [and] a lot of people that come here speak other languages, so that to me, it's interesting to see. (May 31, 2016[a])*

This participant does not recall seeing any bilingual poll workers to help voters understand the process, given that their workplace is located in a linguistically and culturally diverse neighborhood and has occasionally stepped in to help constituents who would not otherwise know what to do.

The Election Commission came up in another conversation, with a participant whose work involved getting people registered to vote. He was unsure whether it was the role of the Election Commission to actively register people to vote, but he had “never seen them at events” (June 2, 2016) where they could distribute important information and sign people up to vote.

#### NOT JUST LANGUAGE: OTHER BARRIERS TO ACCESS

While language was the primary focus of these conversations, participants identified other barriers to access, including social and legal incongruence, lack of cultural sensitivity, and time.

Many participants shared that when immigrants and refugees arrive to the U.S., they experience a social and legal incongruence which could lead to simple misunderstandings or something worse. Participants referred to a disconnect between what is legal and illegal in different countries. Several participants gave examples of norms around child care:

*Sometimes people leave the child in a car, and like my country, they can leave the child in a car or home, even though they are young age, but here, you know if you leave child by themselves I mean, neighbor or the police will come. (July 13, 2016)*

Though it is permissible in some countries to allow young children to remain unsupervised at home or in a car, this is socially and legally frowned upon as described by this participant who notes that a “neighbor or the police will come.” Another participant comments on this same issue:

*For me, if a kid is like 15 years old or 13 years old, they are able to take care of their little ones, they can take care of them, but here if you're not 17 and they find you with your brothers and sisters they're going to be taken away. And it's hard for the new Americans especially who are working for minimum wage, and they can't find babysitters or -- it's hard for them to find -- and like I know Department of Human Services provide like babysitters and stuff, but it's not everyone, and not everyone knows that that option is there as well. (July 13, 2016)*

Not only are these practices considered a violation of social norms, but they often come with legal ramifications. However, as this participant explains, these expectations can also present a financial burden, as many parents cannot afford to hire a babysitter working for minimum wage. Moreover, those newly arrived to the U.S. may sometimes not even know that there are options, like that of the Department of Human Services described by the participant.

Lack of familiarity with U.S. processes also poses obstacles to opportunities, particularly as it concerns entrepreneurship. As a case worker explained, people who want to start a business do not know the different steps necessary to abide by legal restrictions:

*Here there are codes about the restaurant, about the water fountain, everything. People do not understand, the hygiene, the ratings in the stores. So these are the things that are still a way to go, and people still need to -- I think they haven't learned that or they don't know what they need to know. (May 25, 2016)*

The requirements and codes that budding entrepreneurs need to know to start their own business in the U.S. may often be absent or not consistently enforced in other countries. Here, there are codes for “everything,” but many LEPs “don’t know what they need to know,” which restricts one’s ability to start a business and avoid code violations.

Even when they are not as severe as to trigger legal ramifications, other types of misunderstandings pose challenges to LEP communities. One participant explains what they mean by the term “cultural sensitivity”:

*Facilitator: So you said it’s not just language-- it’s also cultural sensitivity. So what does that mean? What do Metro Departments need to know beyond language to make their services accessible and meaningful to populations that don’t speak English?*

*Participant: Just having the knowledge of the culture because one thing is to know the language, another thing to know the culture, and a lot of times, people can speak a language, but they have no clue about this culture.*

*And a lot of times there is the same language spoke in several countries, but the culture is different [...] It happens to me all the time. I help immigrants and a lot of times we have to write their stories and they say, I’m from Mexico. So when I’m reading somebody’s story from Mexico, I can understand what she’s referring to[...] but I’m reading the story from somebody from El Salvador, and they say a word or two or a sentence that I have no clue what it means. It’s all in Spanish, but I have no idea what this means. So I have to call the person and ask her to explain. [For example] in Mexico, we call the kids niños. In El Salvador they call them cipotes [...] and I’m like, that sounds like something you will eat! [...]so I had to ask what that was, and you know, I realized in every country the culture is different. We can say the Latino culture is similar, but when you get it together, you realize it’s not that similar. (May 31, 2015[b])*

**“One thing is to know the language. Another thing to know the culture, and a lot of times, people can speak a language, but they have no clue about this culture.”**

**(May 31, 2015[b])**

The participant borrows from their own experience to highlight the importance of cultural awareness and sensitivity. This particular participant (of Mexican origin) admits that although they speak Spanish, at times they do not fully understand what their clients tell them. Language and culture are linked and both should be taken into consideration. As the participant explains, Mexicans and Salvadorans may speak the same language but the vocabulary could be different enough to require explanation.

Another participant also touched on the need for departments to be aware of cultural differences, especially when it comes to social expectations. She explained that many of her clients often bring their whole families to appointments and that she has made efforts to accommodate them.

*When I'm talking about accommodation, for example, as a Latina, like we have big family, and when we go to appointments, we go with everybody. One of the things that I requested in my office –I need chairs. (June 2, 2016)*

Recognizing that some families may be larger than others, and that some parents may bring their children along to their appointments, this participant made sure to accommodate the needs of these families. It is little details like this, the participant explained, that ensure that all families feel welcome in offices.

Another obstacle heard in the focus groups was that of time. While there are services available for low-income and LEP families, they often require a time commitment that many cannot make. One participant shares:

*People need services, but in order to get them like the Interfaith Dental Clinic, I mean, I think it's a great program, but it helps people who don't have any money, but you have to show up for a cattle call and take a day off work, and then if you're not one of the first 20 then you have to come back another time [...] and so people just can't do that. (May 31, 2016[b])*

Sometimes the services that are available are administered on a first-come, first-served basis. This is challenging for families who do not make the “cattle call” because it requires taking additional time off. However, taking time off may be the best option for LEP families, particularly if they are trying to communicate with a particular department. One participant shared their clients’ experiences:

*Often I need for clients to call and get their electric bill history, and they're very reluctant to, you know, make a telephone call. For me, I would pick up the phone and I'd call and I'd say here's my account information, and they would fax or send it or e-mail to me. For many of my clients, that's like an all-day thing. They have to take off work. They have to go to the office. They have to make sure that there's somebody there that they can speak to. It's just much more complicated, and for that reason, I think people are reluctant to even try to communicate by telephone, so they physically go into offices to do those kinds of transactions that would be -- for English language speakers would be an easy phone call. (May 25, 2016)*

LEPs can find it intimidating to call a phone number, knowing that the person on the other end does not speak their language. They prefer, instead, to go to an office in person to try to find someone they can communicate with face-to-face. However, this often becomes an “all day thing” that requires they take off work and could potentially be costly.

Another participant emphasizes the need for patience and sensitivity on behalf of those serving immigrant or refugee communities. This participant provided the example of Rohingya, a language that is relatively new to the area:

*[Rohinga] is one of the most persecuted religious minorities, and [they need to] treat them all with some sort of patience and cultural sensitivity, knowing that it's going to take a court clerk half a day in order to communicate with this person if they don't have*



*that translator and they should be patient with that, because it's also that person's half day[...] (May 25, 2016)*

It can be a frustrating experience for department staff to attempt to communicate with someone who does not speak English, but this participant reminds us that is mutually trying and takes up valuable time for constituents as well.

## WHAT METRO NEEDS TO KNOW

### RECOGNITION OF OTHER LANGUAGES AND CULTURAL GROUPS

Participants also asked that Metro departments have some awareness around different languages and cultures, particularly the newest ones to Nashville. As discussed in previous

**“I think Spanish language services are really widespread and for the most part, available, but that’s not true for every language.”**

**May 25, 2016**

sections, the Spanish-speaking community benefits tremendously from radio and TV stations, newspapers, and bilingual interpreters. Focus group participants were largely in agreement that Spanish assistance was largely available and accessible, and that departments are usually aware of the Arabic, Kurdish, and Somali communities, but emphasized that it was sometimes a struggle for smaller linguistic minorities and those new to Nashville to access services. One noted:

*If they're translating official documents for people that can be used, like for different resources that are there, they only focus on like Arabic, Somali, Kurdish, yeah, but then they forget they're Nepalese, they are Vietnamese, they are*

*Bosnians, they are all -- Those are the languages, too. Then it might be a small number of the community, but they also need it. And they're growing, so I think that's a big problem as well. (July 13, 2016)*

### ASSUMPTIONS MADE ABOUT IMMIGRANTS AND REFUGEES

Participants challenged some of the most common assumptions about immigrants and refugees, particularly their levels of education and literacy. As they explained, many immigrants and refugees come to the U.S. with high levels of human capital but have to start over once they arrive. One participant explained:

*Some clients, they have a background education, higher education, but then it's like once they get here, you know, no matter what, you know, what kind of degree that they have back home, you know, will not be recognized here, so that's a big challenge. Normally like a professional level, they never have the kind of experience of a hard [? 10:44] job, but here in order to survive they have to start -- they had to do whatever. It's really challenges for them. (May 26, 2016)*

It is a hard for some community members to transition to life in the U.S., especially if they were professionals in their home country and can no longer work in their former occupation. Many come with a great deal of skill but are unable to utilize their degree and experience.

Referencing the other end of the educational spectrum, participants also began conversations about individuals who come to the U.S. without the ability to read or write, even in their native tongue. One participant commented that we rely too frequently on printed forms of communication to reach populations who cannot understand them:

*Facilitator: So do you think that the form and flier is a bad way of communicating because they're in English [?] Is a phone call more --*

*Participant: No. Even if it's properly translated into the target language, it's -- I'm not saying it's an ineffective way. It's insufficient, because you find that many would not be able to read it, even in their own language, so [...] we need to adopt a multifaceted, a comprehensive approach you know, in communicating with these families. (May 31, 2016[a])*

Other respondents in various focus groups also made the point that “a lot of people are illiterate, even in their own languages.” (May 31, 2016[b])

#### *NOT ALL INTERPRETERS ARE GOOD INTERPRETERS*

Participants, several of whom were interpreters themselves, had a lot to say about interpretation services. In one particular conversation about interpreters and the challenges with finding interpreters that speak the right dialect, one respondent made the point that it is impossible to serve everyone’s needs but provides some guidance on how to be the most efficient:

*We need to know the populations here in Nashville. You cannot provide interpreters to every single individual [or] family, because it's very hard, but if you have like populations, like how many populations, the numbers, you go by that. (May 31, 2016[a])*

**“If you’re talking about this person is going to be prosecuted, how is that kid going to know what prosecution is?”**

**(May 31, 2016[b])**

The participant recognizes the difficulty in attempting to meet the need of every linguistic community here in Davidson County but suggests that would be worth attempting to get a good sense of “the populations here” in order to anticipate potential need and provide the necessary interpreters. Additionally, this particular group of respondents felt that this information would be useful when deciding which interpretation service provider should be given a contract. One participant explained the current process as he sees it:

*The government puts up a request and somebody bids on it, and they’ll have a little bidding war, and they’ll do their presentations, and then the government usually picks the cheapest one. So you’re getting the quality based on your price*

*[...] I understand that you're keeping the budget low, but that doesn't always get you qualified interpreters. (May 31, 2016[a])*

According to the participant, this form of bidding does not take into account the specific needs of a local community. Instead of the contract going to the lowest bidder, it would be beneficial to utilize demographic information to aid in the selection of a provider.

Participants also had much to say about a group of people that they say are too often and inappropriately used as interpreters: children. This was listed as a common strategy among LEP constituents for overcoming language barriers and as bad practice among any service providers. One participant explained what they find so problematic about this practice:

*Here's the thing, and I always try to tell this to parents and to agencies that sometimes use the children to translate. It's like, this kid doesn't understand the language. They do understand English and Spanish language and Arabic language and whatever other language, but they did not understand the language -- the appropriate language for medical or for legal stuff. (May 31, 2016[b])*

Another respondent echoed this point, asking:

*How is this kid going to give you (laughs) instructions of how to take a medicine or how are they going to tell you about this medical procedure that you're going to have to get done? That's not in the language that a kid uses. (May 31, 2016[b])*

Both participants make the point that children of immigrants and refugees, while often times bilingual, do not have the sophistication or the vocabulary to interpret medical or legal information to their family members. Focus group participants found the use of children as interpreters inappropriate and potentially harmful.

## TRANSPORTATION AND DRIVER LICENSES

While outside the scope of Metro Nashville's jurisdiction, the Department of Motor Vehicles and the issue of driver licenses were consistent and important themes for the immigrant and refugee communities. In fact, driver licenses came up during each of the six focus groups because transportation was seen as a significant barrier to access to services in Nashville. One participant succinctly summarized the importance of this topic with a quick anecdote:

*Recently, I have a cousin who just [arrived] and he say why everybody has a car? I said, because if you don't have a car, you cannot go to work. You cannot function generally...so that's how important this topic is. (May 31, 2016[a])*

This statement aligns with one of several points that participants made about transportation in Nashville, namely that driving is so important for these communities that they often risk the dangers of driving without a license in order to get to work, take their kids to school, or just get around.

One participant shared their concern about some of the strategies their clients utilize in attempting to get driver licenses:

*I started really questioning people, because several of our [English] learners have licenses and they're totally illiterate, and it's like, how did you get that? Can you just tell me how you got that? (laughs) So I've heard all kinds of things. Paying people -- And there were a couple people in Nashville that got busted and have gone to jail because of it. Also, going to other states where people could register for a driving school, which was a legitimate driving school, but our people would drive like to Kentucky I think was one of them, and they would just go up there and give the money and get the document, and then it's easy to transfer your license from state to state. (May 31, 2016[b])*

This participant listed a number of strategies their clients have used to obtain some form of driver license, including paying people for a fraudulent ID and going to other states, like Kentucky,<sup>8</sup> where exams are administered in a wide variety of other languages.

This last strategy was well-known among participants, many of whom questioned why the driver license exam in Tennessee was not available in the languages most needed – particularly Arabic and Kurdish.<sup>9</sup> They felt the lack of translated resources and materials was, among other things, unsafe for all Nashvillians. Participants described a “big cycle” in which the DMV does not administer tests or materials in the necessary languages or where the staffs are often unsure about who is eligible for a driver license. As a result, many community members either drive without a license or are forced to rely upon public transportation that can at times be unreliable or burdensome.

**“Nashville has to kind of bridge where the federal government ends...so that they can access those things”**

**May 25, 2016**

One participant explained:

*we have a lot of clients that are [...] trying to get driver's licenses and there's a real disparity between different offices of understanding whether these individuals are entitled to driver's licenses or not, and because of the language barrier, they don't get information. I know that's not a Metro function, and it's not a Metro office, but if Metro could play any role in sort of educating the state about the rights of people to obtain driver's licenses, that would be fantastic. (May 25, 2016)*

While this participant knows that driver licenses fall outside of Metro’s purview, he sees a role for Metro to be an intermediary between the state and community through some form of education. Specifically, they would like Metro to bridge the gap in information, particularly as it relates to who is eligible for a driver license. Another participant echoed the need for education, albeit for immigrants and refugees themselves:

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<sup>8</sup> Available testing languages for the written permit exam in Kentucky are: Albanian, Arabic, Bosnian, Cambodian, Chinese, Croatian, English, French, German, Japanese, Korean, Laotian, Persian, Polish, Romanian, Russian, Somali, Spanish, Thai, Turkish, and Vietnamese.

<sup>9</sup> In Tennessee, the driver license exam is available in four languages: English, Spanish, Korean, and Japanese.

*I think it's a detriment to society in general for our city, for everyone, immigrants and people who have been born here in that we don't educate immigrants on our driving...Driving is a concern and a safety issue, and without having [information] in other languages, it doesn't make sense for any us. (May 31, 2016[a])*

Another participant saw the driver license issue as endemic of a variety of other obstacles for immigrant and refugee communities and of the “growing pains” affecting all Nashvillians:

*I think that a lot of this could be eliminated if the city had a mass transportation system. Obviously we do need IDs, so that's important, but then we have those problems that rises, hit and runs and people not passing the test so they can't get an ID. However, we have students that can't drive because they're still so young, but they can't get to their internships because no one can take them, so just taking the public transportation we have is not feasible, because it's not -- it doesn't work. And as the city grows, there's more need of this mass transportation, because as we mentioned, everyone is moving to outside of the city because they can't find affordable housing in Nashville. So how are they getting to their jobs? And that's when we have traffic issues and all kinds of different problems that have [arisen] through the years. And I know this is in the agenda at some point for the mayor, but public transportation is a huge issue right now, that if it's fixed, it eliminates so many other issues that come along with that. (May 31, 2016[a])*

It was not lost on participants that the importance of driver licenses is tied to a number of other issues – mass transportation, affordable housing, and traffic.

## SUGGESTIONS FROM THE COMMUNITY

Given their experiences within immigrant and refugee communities, participants had numerous suggestions and comments for how to improve the quality of life for their community members. Some of these are listed below:

### (1) A Municipal ID

*Facilitator: What do you think would be the benefit of that?*

*Participant: We have so many clients that aren't documented, that can't sign up for accounts. They can't open bank accounts [...] They can't do almost anything without any sort of official photo—government issued photo identification [...] you know, people are desperate to have some sort of government issued photo identification and I know that's not strictly a language issue, but (laughs) it's an important issue. (May 25, 2016)*

### (2) Utilizing media and social networks

*We could perhaps create a system of informing -- at least focusing [...] only in five languages, we cover roughly 80% of our entire immigrant or refugee population in Davidson County. I mean, we have in our school system, we have*

*different languages so that reaches out to our MNPS families. What about other families that are not necessarily MNPS families, but are here and deserve to be informed of what is going on in the different aspects? You know, even if you have subtitled information— that would be even great. You can have that or [a] specific day addressing in particular population or language [...] Say that, hypothetically, if there are [...]five main languages that you pick one day for one language, and let's talk about metro or let me help you, inform them, empowered on these things. (May 31, 2016[a])*

*Maybe through media, like having the mayor or someone do a PSA and show it right after the local news or something where she's welcoming everyone to Nashville and [says] for more information, please make sure to visit our [Metro] website, or things like that. (July 13, 2016)*

*It would be neat if on the public channel they could have a few shows in different languages. That'd be really neat. (May 31, 2016[a])*

*I know about Facebook, social media and stuff, like you can do advertisements. You can like tag it in the group, like "Immigration people that live in Nashville." (July 13, 2016)*

- (3) Expanding outreach to immigrant and refugee communities and creating intentional opportunities for them to interact with Metro departments (such as MyCity Academy)

*We have three of our learners on [MyCity Academy] right now. Now I can't tell you when they get that information, how many people they share that with [but] I think that's a great idea, and maybe it should be expanded.(May 31, 2016[b])*

*I think the schools, like just maybe having a representative at the schools, like going to open houses or you know, whenever school starts, there are so many things going on in open houses and assemblies, may be good to have a table there, like a lot of organizations do, and have a representative there that just tells people, hey, you know, we're with Metro, and we're here to help you, and here, take this home. (July 13, 2016)*

*I was going to say the police department recently had like a 5K downtown, and I thought that was really nice actually. Like I*

**“When you have to work with other counties and you compare services in Davidson County with the other counties, I've got to say Davidson County is doing a great job. You know, there is always room for improvement, but they are doing a good job.”**  
**(May 31, 2016[b])**

*participated in it, and it was really nice, because it was an opportunity to be there, like have some food, exercise and be with the police department and learn more about what they're doing and it was just nice for them to organize something like that with the community. I think events like that are very helpful. Because also you see them more as like humans, you know, like you're running a 5K with them, and then you're eating breakfast with them. So I thought that was really nice. (July 13, 2016)*

*Participant: Maybe the community centers can organize like a huge like party, like a cook out, and all of -- You know, something like that, like the Antioch, the new one, the original center over there has great space. Maybe they could organize like cook out, and everyone in the community is invited, and then you all the other departments there in tents, and they're just kind of telling people what they do, and I don't know, something like that.*

*Facilitator: Like a big Metro festival.*

*Participant: Yes. Yes. (July 13, 2016)*

*Participant 1: what about having something at the airport? Like when you come here. And it's at the airport like having a kiosk or something that is like Metro, like welcome to Nashville, and here are some resources.*

*Participant 2: Like a city guide too even.*

*P1: Yes. Yes. (July 13, 2016)*

*You know, some nationalities, they live in certain places, so they don't really go outside you know beside where they live, so if they have something happening where they live, I think they'll [come]. (July 13, 2016)*

#### *(4) Working with the private sector to integrate immigrants and refugees*

*Tyson Foods you know, is a big employer, and whose responsibility -- Is it anybody's responsibility to help their employees learn a language? I mean, they're on a line all day. You know, we have a lot of Tyson employees in our program, but other people -- Could Metro be subsidizing something to help? I mean, these people live here. Maybe they could work with Tyson. I mean, I don't know if y'all know this, but if a Tyson employee gets their citizenship, Tyson pays the fees. (May 31, 2016[b])*

(5) Promote education to immigrants, refugees, and U.S. natives

*The other thing is that if you are undocumented, you cannot get help, like social services, like Social Security benefits, so some people don't know that, and they think oh, the Hispanics are taking all the benefits. That's not true. (June 6, 2016)*

*We used to take refugees over [to the library]. They have a small part where you can get information about becoming an American citizen, or you can learn how to be -- to get a permanent resident, stuff like that, so I think that's really great for them. (July 13, 2016)*

*I'm thinking in addition to offering ESL classes and all of that, I think it would be nice to also include cultural competency in there. Like what are the cultural barriers? Like in the US this is how we do things, or this is how you talk to a police officer, or you know, things like that. (July 13, 2016)*

*Right now I just think it's horrible what's going on in the United States, the attitudes towards immigration and refugees, and we -- I think we desperately need to educate the White culture or the majority culture on why these people are here and to understand them. They're not here to take our jobs. They're not here to mooch off government money, and so that's what I mean by maybe helping to work the opposite way, if that could help. (July 13, 2016)*

*I think also with the police some people think that the police can deport people, and that's not true, but some people don't know that. That's one thing that also the police should inform so the community can be more comfortable. (June 2, 2016)*

(6) Translate vital documents, websites and/or resources that will assist communities in their interactions with Metro

*I'll say the police, when you do a police report, they give you like a paper, a booklet that should be in Spanish. Because it gives you lots of information. (June 6, 2016)*

*I'm not sure if this is something that is doable at all, but I wonder if it would be helpful if when you go into the Metro government website that there's like a place where -- And I don't even know if you guys have it already, but if there's a place that they could put a place where you can click and it can give you all the information in different languages, you know, like maybe have like some like flags at the bottom, like you know for Mexico or from Japan and that way you automatically click on it, and then it all comes out in that language. Because if you're brand new and you may not speak English, at least you can go to that and then kind of understand, okay, this is what Metro government offers and*



*everything, and then that's how you think you start spreading the word, because then you tell somebody else. (July 13, 2016)*

- (7) Partner with community organizations to distribute information to non-English speaking communities

**I get the impression that it's like, yes, we support new Americans as an important part of our agenda. And who we are and where we want Nashville to be, but in terms of connecting them to services, that's where there is the disconnect for me as a provider.**

**(July 13, 2016)**

*Americans] as someone who also works with this community to bridge that gap. (July 13, 2016)*

*It might be good for we that are service providers that teach English or citizenship that maybe we need to have some training or information sessions on just what it is that you have to offer for non-English speakers. So when they come to us in class and ask us about something, we have some information to be able to give them. (July 13, 2016)*

*I was thinking, like, so our organization we resettle refugees, right? So does Catholic Charities, so does World Relief. They have to have a cultural orientation as a part of it, so that could be something that's encompassed within the cultural orientation. Welcome to the United States. Welcome to Nashville. Welcome to being a part of Nashville government, right? Like in this community. Here are the services that are provided. Here's where you could go for this, this, this, and then they know right away. (July 13, 2016)*

*To be honest, I get the impression that it's like, yes, we support new Americans as an important part of our agenda. And who we are and where we want Nashville to be, but in terms of connecting them to services, that's where there is the disconnect for me as a provider. I'm not sure how to connect with [the Office of New*

## DEAF AND HARD-OF-HEARING COMMUNITIES

In addition to the six focus groups dedicated to the perspectives of immigrant and refugee communities, we conducted a focus group at Bridges for the Deaf and Hard-of-Hearing on September 23, 2016. Two interpreters from Bridges assisted with the focus groups. While the majority of participants lived outside of Davidson County, they frequently visited Bridges (located in Nashville) and could speak to the differences between Metro services and those in their own towns. As one participant put it, *“There is a small number of Deaf community members that live outside of Davidson County, but they should have just as much access as those who live here in Davidson.”*

Indeed, participants shared that Davidson County seemed to be ahead of its surrounding counties in terms of responding to the needs of the Deaf community. While not all participants could speak directly to Metro services, they were all very familiar with one particular department - the Nashville Public Library. As one participant shared:

*I know the Nashville Public Library is much different [from those in other counties], because they actually have services for the Deaf that are located in that library. This is what [another participant] was talking about when she said [...] everyone in the Deaf community knows where to go now. If they ever were to shut down that particular unit or department, I think the Deaf community would be at a loss and not know how to get services.*

Many participants commented on the fact that services across neighboring counties looked so different. While they acknowledged that the Deaf and hard-of-hearing community in Davidson County was larger than that in other counties, they were curious about the potential for standardization. As one participant commented, “I'm not quite sure how the government works, but one of my thoughts that I would like to share is they need to stay on the same page so that the government in Davidson County and the surrounding counties respond in a standard, uniform way.”

When pressed about what “standard, uniform” service might look like, participants further elaborated by pointing to speedier response rates and smarter technology. Smart 911 video remote interpreting services, in particular, appear to be the baseline for access to emergency services. Participants pointed to Cheatham and Wilson counties as locations where the population was growing but the resources and services were slower to respond.

### MISCONCEPTIONS & MISCOMMUNICATION

There were several identified misconceptions about the Deaf and Hard of Hearing community that participants wished to debunk. First, that they are considered (or consider themselves) disabled. One participant explained:

*Many times people assume that we're “disabled” and we're not. We just need clear communication with who we're working with, you know, sometimes people see us, and they just assume that we have disabilities or they'll look down when they're talking and if we're trying to get their attention, they don't realize that we're Deaf, so we try to*

*work with them, and they try to increase services, but we don't need them to feel sorry for us.*

Participants wanted to make clear that the Deaf community is not disabled; people in the community simply require a clear method of communication. In his statement, this participant points to the fact that many people “look down” when they are talking, making it hard for them to attempt to communicate. Moreover, he makes the point that they “don’t need them to feel sorry for [them].”

Participants gave a number of different examples of times in which it was apparent to them that there is little education about and exposure to the Deaf community. One participant shared a story about something that happened to her family:

*We went to Cracker Barrel, we went into the restaurant and there was a woman who was our waitress, and the two of us went around and they gave us a menu, and it was Braille. And we're not blind. We're deaf. So I walked up and said, no, no, no, I don't have a cane. I'm not blind. And they're like oh, we're sorry, and they gave us the English menu, but people sometimes see the Deaf community and think we need those same services as the blind community.*

This interaction (and the affirmation from other participants that this was not out of the ordinary) illustrates the frequency with which the Deaf community encounters awkward situations due to the misconceptions some people hold about them. As the participant explains, people sometimes conflate the issues affecting the Deaf with those affecting the blind.

Often, this unfamiliarity with Deaf culture leads to unpleasant encounters and cross-cultural miscommunication. For example, one participant recalled an experience at the DMV in a town outside of Davidson County, where the person assisting her kept rudely pointing as she attempted to direct her to where she needed to go:

*The lady that worked there had a really bad attitude. She just kept pointing- you go over there. You go that way, and I say well, what do I do with this picture? And she just sort of pointed to me like that, in that direction, so [my client and I] walked over, and like I said, there was no one there to help us.*

For the participant, the lady at the DMV showed a lack of respect in pointing, without any real effort to assist her and her client. Another respondent articulated why this situation was especially sensitive: “it’s a cultural thing, how the body language is received and understood by the Deaf community, so sometimes specific body languages like, you know, pointing, that to us is negative.” Because body language is so central to Deaf culture, certain gestures (like pointing) are seen as disrespectful. Indeed, when asked what she would like the DMV to have done differently in the situation, the first participant shared:

*I want to tell the driver's license office, please don't point and be rude and you need to show respect to the Deaf community, you know, if you see a Deaf person, be respectful, help them, don't just point and send them away. It's not nice. There should be a mutual respect.*

## OBSTACLES TO ACCESS

Through their personal experiences, participants offered a variety of insights into the obstacles the Deaf community faces when attempting to access services. Over the course of the conversation, participants mentioned having called ahead before going to places like the DMV. While one might be inclined to think that this might be a good strategy for the Deaf community, participants explained that this practice does not always work out as expected. One participant recounted how a government worker he spoke to over the phone was not there on the day they had discussed him coming in person. Another participant felt similarly, that a lot of staff turnover meant “calling ahead doesn’t do any good.”

Other participants described obstacles when trying to get immediate services. One participant described her experience at the emergency room after hours:

*If I've gone after hours, I'll go into one door and those doors will be locked. You have to go into the emergency entrance, and you hit a speaker, and someone's talking, saying hey, come on in or saying a message, and I can't understand them, so -- because you hit a button and they'll say come on in or who you are. We really don't know what they're saying, so I'll just look at the camera and sign something so they'll know*

Some procedures, such as the one at the emergency room after hours, create barriers of access. As the participant shared, she was unable to hear the speaker on the other end and therefore had to “sign something” so they would know that she was trying to come in. This is perhaps not an uncommon obstacle. However, other participants described situations where miscommunication brought about some strange and unusual situations. In one example, emergency room workers thought a participant was reaching for a gun when, in reality, he was looking for his phone. He explained:

*When [my wife and I] went to the emergency room, we had to use a [phone to ] text, and when I went to reach for my phone to use a text, they thought I was reaching for a gun, and so that really threw them off. So be careful when you reach in your pocket for something.*

This was not the only scenario in which participants were perceived as potentially dangerous. In another account, participants attempted to order at the drive-thru window, to unexpected results:

*We went to Taco Bell, and I guess we got there after they had closed, and we walked up to the window and we pointed, and we said you know, we couldn't hear, and the woman started screaming, screaming to her boss, and my daughter looked and my daughter said no, no, no, they're deaf, they're deaf. I think they had already called the police at that point. They were on their way, and my daughter kept trying to explain, no, no, they're deaf, they're deaf, and so you know, they told us not to go up to the window again because that frightens the workers there.*

These examples, while perhaps out of the norm, nonetheless affirm participants' concern around the misconceptions that exist and how these can become barriers for access to services (government or otherwise).

#### THE IMPORTANCE OF PROFESSIONAL INTERPRETERS

A great deal of the conversation was focused on the topic of interpreters -- how they can ease communication and enhance access to services and information. One participant explained that while writing back and forth was a viable option for communication, it is not the best practice. She shared:

*Sometimes I would bring something to the hospital in the emergency room and the doctor would come in to see me and I write, where's the interpreter, and they would just say oh, I don't know. We're just going to have to work by writing back and forth, and so you know, I just kind of have to accept it, but best practices would be to have an interpreter.*

The group was adamantly in agreement about the importance of having a professional interpreter, especially during medical and emergency situations. While the group agreed that it was a big problem not to have an interpreter, they also found it problematic for service providers to rely upon patients to bring along their own assistance. Another participant shared her experience:

*When I arrived to the hospital, my daughter hadn't arrived yet, and I told the nurse please call an interpreter, and they said one minute, one minute, one minute, kept kind of blowing me off, and my daughter arrived and [the nurse] said oh, the interpreter is here, and I said no, that's my daughter. You did not call an official interpreter from Bridges. Please do so.*

While her daughter was capable of providing some interpretation, this participant was resolute in her request for an "official interpreter." Others also chimed in about the concern around using family members as interpreters. While participants explained that sons and daughters occasionally have to step in to assist, they would much prefer a professional. They also believe that this should become common practice and fear that relying too often on family members would encourage medical professionals and other institutions they encounter to depend on patients and clients to provide their own interpreters. One participant addressed the group:

*One thing that we need to keep in mind is that if we have family members to become interpreters in those situations, that really creates sort of a negative effect down the line, so that providers say oh, I remember my last experience the deaf person brought their own interpreter. It was a family member, so that's the sticky part. If you bring someone in there, then the next time you ask for an interpreter, they may say well, you brought your daughter last time. Why can't you bring your daughter again? Then that becomes a constant.*

As the participant explains, using a family member as an interpreter can have negative ramifications, potentially placing the burden of interpretation on someone who is not

professionally trained. Moreover, it suggests to service providers that they do not have to do their due diligence with Deaf clients. In fact, participants felt that many service providers lacked awareness around the importance of professional interpretation. This was signaled in a number of ways, including delays in interpreter requests or even failures to submit a request for an interpreter. One participant explained:

*In my experiences, I've had a lot of trouble getting interpreters to show up at the hospitals after a situation happens. So if [hospitals] don't find an interpreter, that's a serious problem.*

Providing access to an interpreter was not only identified as the best practice, but also a legal requirement. Even with this, however, participants still described a great amount of difficulty getting help sometimes. As one participant remarked:

*I want them to know that the interpreters need to show up on time. I don't want to be sitting and waiting for hours and hours, and you know, give up and leave and go home. I think there needs to be a timely process for getting interpreters.*

Advances in technology have provided alternative options for providers looking to better serve the Deaf community. One such technology is that of Video Remote Interpreting (VRI), in which an interpreter can be remotely called to assist. Interestingly, participants were critical of the reliance of service providers, especially in the medical field, on VRI. While they acknowledge that the new technology can be useful, they largely agreed that it should be a last resort and not the preferred method of communication. One participant shared her concerns:

*When a video remote interpreter comes up on the screen, it works for the short term in my opinion, but if we're having a deep discussion about a serious medical procedure or medication, I would prefer to have a live interpreter*

Others echoed this point – making the case that it is always better to have a live interpreter, particularly because of regional differences in American Sign Language. However, participants pointed out that there is commonly some confusion around what the term “live interpreter” means. While the Deaf community expresses a preference for in-person interpretations, they understand that:

*From a doctor's perspective, [Video Remote Interpreting] is a live interpreter. They think that. They think that is a live interpreter on the screen, but what you would need to say is I want a live, in-the-flesh interpreter here at the hospital*

However, even when interpreters were available, there was some confusion on how these interactions should go. Participants reported that service providers would sometimes talk directly to interpreters instead of to their client, making them feel invisible and without any sense of control. One participant shared,

*I had to go to the code office to get some permits [to start work on our basement], and I worked with people there, and in my experience, it was a little bit different [...] I brought a lot of questions that I wanted to cover [...] so I brought a person who could*

*help me out with interpreting, but it seemed like the conversation was happening between the interpreter and the worker and not myself, so I tried to kind of take control and you know, fix the situation because I was trying to start a project on my basement, and I didn't want to get turned down, but that experience was rough for me because they weren't communicating directly with me [...] For example, they wouldn't look at me directly. They kept looking at the interpreter, and I was trying to be polite and say, you know, I'm the homeowner. It's my basement. I need to communicate with you directly and had my questions answered, but they weren't -- They were speaking like they were talking to the interpreter.*

This situation, and others like it, is frustrating and illustrates a lack of awareness around both Deaf culture and common interpretation practice. Professional interpreters are trained to provide direct interpretation, not to engage as part of the conversation. Speaking directly to an interpreter denies the client or constituent the courtesy to feel like they have a voice. Participants continually emphasized the need for staff training on interactions with Deaf clients and constituents in order to avoid potentially awkward and disempowering situations.

#### OTHER SUGGESTIONS FOR BEST PRACTICES

While access to interpreters was key, participants offered other suggestions for what best practices might look like within and outside of government. For some participants, the requests were simple:

*I would like for the front desk people just to be fully prepared to have a pen and paper ready, and perhaps if possible have the staff there. Of course they're not there to serve the Deaf community, [...] but have people that are ready to maybe guide someone who is deaf-blind, or to write down specific directions.*

Some recommendations were much more elaborate, offering solutions to some of the most common obstacles faced by the Deaf community. Most of these were related to first responders. For example, one participant had a good experience with a first responder and recommends a similar system throughout all of Middle Tennessee. She describes how the EMTs knew she was Deaf before they arrived at her house: “I said oh, how'd you know we were deaf, and they said oh, it was already written in the system. Next to our names they had a tag that said we were deaf. So that was a good service and we were happy with that.”

Other suggestions also followed a similar theme of preparedness. A conversation between participants sparked the recommendation for an easier way for ambulance services to know they were going to be treating a Deaf patient. As one participant suggested:

*We should set up another hotline or number for different groups like the Deaf and hard of hearing community, so that way with proper training those people can focus on serving those communities that are connected to this different number, and then they can respond in the right way.*

The recurring theme throughout the focus group was summarized succinctly by one participant who shared, “We don't need sympathy. We don't need that kind of feeling. We just need access

to communication. That's it.” As illustrated by the participants themselves, communication can be enhanced through the help of interpreters, systems of response that quickly identify Deaf constituents, and more widespread education and training around the needs of the Deaf and Hard of Hearing.



## LANGUAGE ACCESS ACROSS THE UNITED STATES

Cities across the United States have implemented language access plans to serve Limited English Proficient communities in fulfillment of Title VI of the Civil Rights Act of 1964, which requires that recipients of federal funding take steps toward making sure that populations that speak limited English have meaningful access to services and programs. For many municipalities, this commitment to meaningful access has resulted in mandates to ensure equal access to all people. We offer summaries of several cities that have taken intentional steps towards improving services for LEP constituents, as well as a language access planning tool from the U.S. Department of Justice.

### **King County, Washington (2014)**

[http://www.kingcounty.gov/~media/elected/executive/equity-social-justice/2014/LEP-proviso-report\\_final-june-2014.ashx?la=en](http://www.kingcounty.gov/~media/elected/executive/equity-social-justice/2014/LEP-proviso-report_final-june-2014.ashx?la=en)

The Office of Performance, Strategy & Budget in King County, Washington, released its *Limited English Proficiency Proviso Response Report* in 2014. The result of a budget ordinance that required an analysis of the county's LEP population, as well as recommendations for better serving their needs, this report outlines an action plan to increase access through a variety of short and long-term recommendations including, but not limited to:

- A statement of values that declares King County's dedication to serving the needs of LEP residents by way of a policy adopted by council
- The appointment of a translation coordinator to manage more effectively the distribution and billing of services across county departments and an outreach coordinator responsible for engaging LEP individuals through collaborations with community based organizations and other forms of intentional outreach
- Concerted recruiting, hiring, and retaining strategies that are inclusive of LEP communities

### **Chicago, IL (2014)**

[http://www.cityofchicago.org/content/dam/city/depts/mayor/Office%20of%20New%20Americans/Recommendations\\_from\\_LAP\\_Committee.pdf](http://www.cityofchicago.org/content/dam/city/depts/mayor/Office%20of%20New%20Americans/Recommendations_from_LAP_Committee.pdf)

Chicago's Language Access Advisory Committee –comprised of community, legal, and civic leaders-- released its recommendations for making the city more inclusive for immigrant and LEP communities. These recommendations brought forward a city-wide ordinance, a Language Access Policy, ensuring meaningful services to the 5 largest linguistic communities in Chicago. Moreover, \$10,000 was included in the 2015 budget to go towards the translations of websites and materials. As the report states, "All Chicago residents have the right to access City services, but unless they receive those services in a language in which they are proficient, the right is not exercised" (p. 3). Along with an annual report about the state of Language Access, the Committee suggested that each public-serving department should:

- Designate a Language Access Coordinator
- Translate all essential public documents

- Include interpretation services
- Train staff and managers on language access policies and procedures
- Post signage advertising free interpretations services
- Establish a monitoring and measurement services to ensure quality of service
- Create a public awareness strategy
- Develop and share best practices between City departments

### **Houston, TX (2014)**

[http://www.houstontx.gov/ispeakhouston/dlap/City\\_Secretary.pdf](http://www.houstontx.gov/ispeakhouston/dlap/City_Secretary.pdf)

Following an Executive Order signed by the Mayor in 2013, which mandated that all City departments have policies in place for providing information about services and programs to LEP communities, the Office of the City Secretary created a Language Access Plan to guide in the provision of meaningful access to all Houstonians. As part of the mandate, public information is required to be distributed in, at minimum, the City’s 5 most frequently-used languages. One tool in this endeavor is iSpeak Houston, the hub for language access activities, including the Language Access Task Force, coordination of department Language Access Coordinators, and technical assistance for language access to city staff. The Office of the City Secretary takes on much of the responsibility for ensuring the provisions of the Executive Order, including maintaining records of requests for translation or interpretation services, complying with training requirements for staff assisting LEP communications, and routinely measuring and monitoring progress.

### **U.S. Department of Justice (2011)**

[https://www.lep.gov/resources/2011\\_Language\\_Access\\_Assessment\\_and\\_Planning\\_Tool.pdf](https://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf)

The Civil Rights Division of the U.S. Department of Justice released the “Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs,” the goal of which was to ensure “effective communication” between agencies and LEP communities. It introduced a two-fold model:

- (1) Conducting a self-assessment to identify needs and evaluate the supports already in place, with particular attention to six sections: (a) understanding how LEP individuals interact with an agency; (b) identifying and assessing LEP communities; (c) providing language assistance services; (d) training staff on policies and procedures; (e) providing notice of language assistance services; (f) monitoring, evaluating, and updating the language policy directives, plans and procedures
- (2) Developing three important components to a language access plan:
  - a. Policy directives – creating standards, principles, and guidelines that ensure the provision of meaningful access to Limited English Proficient individuals
  - b. Procedures – specifying the steps to provide services to LEP individuals
  - c. Implementation plan - outlining how an agency will meet and maintain compliance standards

## CONCLUSION

Conversations around language access are happening in cities all over the United States, as our demographics rapidly shift. In Nashville, home to one of the fastest-growing immigrant populations in the country, these discussions are even more pressing. The Metro Language Access Study represents an initial platform to begin to imagine, develop, and implement policies and procedures that will create efficiencies and improve access to Metro services for all Nashvillians, regardless of language background.

This study unfolded in three phases. First, Metro department heads and Title VI coordinators were sent a survey in which they were asked about the number of linguistic minorities they serve a month, the languages spoken by these constituents, and the current policies and procedures in place to support these constituents. Second, community leaders and organizations were provided a survey that asked them to rate and describe their experiences with Metro departments. Included in their responses were the departments that they most frequently encountered and the ease in accessing services if one does not speak English. Finally, community members were invited to participate in a series of focus groups that facilitated deeper discussions around their expectations for Metro and around their experiences with Metro departments.

The results of the department survey indicate a real need for a language access plan. More than 75% of departments (and nearly 83% of smaller facilities and branches) interact with linguistic minorities and most are receiving requests for language assistance. Yet, just 35% of departments (and far fewer of the extensions) have a language access coordinator and less than 30% have a system in place to track language assistance services, making it difficult to ensure meaningful access to those with non-English backgrounds. However, those departments that are maintaining data show a strong commitment to language access – collecting information on the type of services rendered, languages spoken, and on interpreter services and maintaining them in spreadsheets and databases.

The community survey suggests that interactions between Metro departments and linguistic minorities vary greatly. While the overall average ratings for Metro departments hover at or below a 3 (on a 5 point scale) for each of four factors – ease in interactions, likelihood that someone speaks the same language you do, likelihood that translation/interpretation services are available, and ease in gaining services if they do not speak English – some departments scored noticeably higher. Going forward, it will be essential to understand what these positive interactions look like and how these efforts can be adapted and replicated Metro-wide.

One additional finding to note is that constituents report learning about Metro services by word of mouth – from friends, family members, and neighbors. Focus group participants and caseworkers in particular, shared several examples of how misinformation can lead to confusion, frustration, and bureaucratic hang ups. Relatedly, among Metro departments, only 25% advertise on non-English media, 35% have translated signage indicating the availability of language assistance services, and 28% have permanent multilingual signage. An intentional outreach effort on the part of Metro departments may serve to build trust among constituents and help to distribute accurate information.

Finally, the community focus groups reveal a number of consistent themes. First, each of the seven focus groups touched upon the need for more certified interpreters. This was a resounding consensus among immigrant and refugee respondents and among the Deaf and hard of hearing. Second, the conversations quickly made evident that language access is not a conversation to be had in isolation. Community members describe a number of other obstacles that prevent them from accessing important Metro services including cultural incongruence, lack of knowledge around resources available, and, most strikingly, transportation. While not under the jurisdiction of Metro government, the issue of Driver's Licenses became a central theme throughout the vast majority of focus groups.

Given these initial findings, we have a number of next steps:

First, we need to take a closer look at Americans with Disabilities Act and Title VI Compliance to better understand what is required of Metro. The Department of Justice suggests a number of key elements for creating a language access policy that aspires to effective communication at all points of contact between linguistic minorities and individual agencies. First, a self-assessment is necessary for identifying how departments and agencies interact with LEP individuals needing language assistance, and what resources are already available. Second, developing language access policies and procedures sets standards and guidelines for providing appropriate services.

Second, we will identify the best short-term and long-term practices within Metro and those adopted by other local governments across the United States to improve language accessibility for linguistic minorities. While every department operates differently and the frequency of interaction with non-native English speakers varies, these strategies may be altered and adapted to suit the needs of different government departments. This could be done using the Department of Justice model (outlined in the previous section) which encourages self-assessment within agencies to identify their unique needs.

Third, given this information, it is necessary to convene a group of stakeholders to evaluate these findings, construct their own local policy recommendations, and begin an implementation plan. This report serves as the groundwork to guide the conversation, offering both the perspective of Metro departments and that of community members. As such, stakeholders should reflect the voices of Metro government and linguistic minority communities.

The *Metro Language Access Study* is not intended to be the end of the conversation around language access, but the very start of it. It should be the impetus for policymakers, practitioners, and community members to come together and design a long-range language access plan that will ensure the equitable distribution of resources, services, and information to current and future Nashvillians.

## REFERENCES

*Limited English Proficiency Proviso Response Report*. 2014. King County Office of Performance Strategy & Budget.

“Demographic Trends.” NashvilleNext Background Report.

“Did You Know?” Bridges for the Deaf and Hard of Hearing. Website accessed January 12, 2017  
<http://www.bridgesfordeafandhh.org/>

“Equity & Inclusion” *What’s Next for Nashville?* NashvilleNext Background Summary File  
<http://www.nashville.gov/Portals/o/SiteContent/Planning/docs/NashvilleNext/FactSheets/EquityAndInclusion.pdf>

Migration Policy Institute. Tennessee as fast immigrant hub

Tennessee Immigrant and Refugee Rights Coalition. 2015. *Countering the Backlash: Strategies for Responding to Anti-Refugee and Xenophobic Activity from the New South*. Released December 2015.

Tennessee Office for Refugees. 2015. *Year in Review*.

“Working with Deaf, Hard of Hearing, and Deaf-Blind Individuals.” *Asian Pacific Institute on Gender-Based Violence*. Accessed on January 13, 2017.  
<http://www.api-gbv.org/organizing/interpretation-working-with-deaf-hardofhearing-deafblind-individuals.php>

Zong, Jie and Jeanne Batalova. 2016. “Frequently Requested Statistics on Immigrants and Immigration in the United States.” *Migration Policy Institute*. April 14.

## APPENDIX 1. QUESTIONS IN DEPARTMENT SURVEY

### PART 1. Identifying Limited English Proficient (LEP) Individuals

1. Are there individuals in your department who interact or communicate with Limited English Proficient (LEP), deaf, and/or hard of hearing individuals?  
 Yes  
 No
2. How does your department interact with LEP, deaf, and/or hard of hearing individuals (check all that apply)?  
 In-person  
 Telephone  
 Email or website  
 Mail  
 Other: \_\_\_\_\_
3. How does your agency identify LEP, deaf, and/or hard of hearing individuals (Check all that apply)?  
 Assume LEP, deaf, and/or hard of hearing if communication seems impaired  
 Respond to individual requests for language assistance services  
 Self-identification by the speaker either in person or on forms  
 Use of "I Speak" language identification cards or posters  
 Based on written material (e.g. complaints) submitted to the department  
 We have not identified LEP, deaf, and/or hard of hearing individuals  
 Other: \_\_\_\_\_
4. What data does your department use to identify the LEP, deaf, and/or hard of hearing communities you serve (check all that apply)?  
 Census  
 US Dept of Education  
 US Dept of Labor  
 State Agencies  
 Community Organizations  
 Intake Information  
 We do not use data  
 Other: \_\_\_\_\_
5. Do you have an internal process for collecting data on the languages spoken by LEP individuals that you serve?  
 Yes  
 No

6. Do you have a process to collect data on the number of LEP, deaf, and/or hard of hearing individuals that you serve?
  - Yes
  - No
7. What is the approximate number of LEP individuals you serve in your department each month?
8. What is the approximate number of deaf or hard of hearing individuals you serve in your department each month?
9. Specify the top 5 most frequent non-English languages your department encounters. List them in order from most frequently to least frequently encountered.

## PART 2: LANGUAGE ASSISTANCE SERVICES

1. Does your department currently have a system in place for tracking the type of language assistance services it provides at each interaction?
  - Yes
  - No
2. If yes, what data do you maintain regarding language assistance services (check all that apply)?
  - Primary language of persons served
  - Use of language assistance services such as interpreters and translators
  - Funds or staff time spent on language assistance services
  - Number of bilingual staff
  - Cost of interpreter services
  - Cost of translation of materials into non-English languages
  - Other: \_\_\_\_\_
3. If yes, how do you maintain this data (check all that apply)?
  - Database
  - Spreadsheets
  - Project management tools
  - Intake files
  - Other (please specify)
4. If yes, who in your department has access to these records or data (list up to 3 people and their job titles)?

5. What type of language assistance services does your department provide (check all that apply)?
- Bilingual staff
  - In-house interpreters (oral) or translators (documents)
  - Contracted interpreters or translators
  - Language bank or dedicated pool of interpreters or translators
  - Volunteer interpreters or translators
  - Telephone or video interpretation services
  - Interpreters or Translators borrowed from another agency
  - Other: \_\_\_\_\_
6. Does your department have an assessment process that staff must complete before serving as interpreters or translators?
- Yes
  - No
7. Does your department *allow* individuals to provide their own interpreters?
- Yes
  - No
8. Does your department *ask* individuals to provide their own interpreters?
- Yes
  - No
9. Does your department have contracts with language assistance service providers?
- Yes
  - No
10. With which language assistance service providers do you have contracts?
11. Does your department provide staff with information on how to access qualified interpreters?
- Yes
  - No
12. Does your department translate vital documents<sup>10</sup> into at least one of the non-English languages of the communities you serve?
- Yes
  - No
13. If yes, which languages (List up to 10)?

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<sup>10</sup> 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.



14. Which documents do you translate (check all that apply)?
- 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)
15. Does your department translate signs or posters announcing the availability of language assistance services?
- Yes
  - No
16. Does your department staff receive training on how to access and provide language assistance services to LEP, deaf, and/or hard of hearing individuals?
- Yes
  - No

### PART 3: OUTREACH

17. Does your department have a language access coordinator?
- Yes
  - No
18. Does your department ever advertise on non-English media (television, radio, newspaper, and websites)?
- Yes
  - No
19. Does your department have permanent or semi-permanent multilingual signage in its offices?
- Yes
  - No
20. If yes, what kind of signage?
- General information
  - Directions
  - Information about the availability of language access services
  - Promotional material
  - Other (please specify)

The Metro Human Relations Commission has partnered with the Office of English Learners at Metro Nashville Public Schools to create a phone platform called BabbLine that allows LEP parents to better understand the forms that are sent home by their respective schools. Translators record transcripts for nine forms in the five most-widely spoken languages by families in Nashville. These recordings explain the forms' intent and, if necessary, how to fill them out.

21. Would a system like this be useful for your department?

Yes

No

22. Do you have a similar system already in place?

Yes

No

23. Do you feel you were sufficiently informed about your department's practices and procedures to answer the questions on this survey?

Yes

No

24. If not, who would you recommend we contact for more information?

25. Any additional comments?

## APPENDIX 2. QUESTIONS IN COMMUNITY SURVEY

### PART 1. Identifying Limited English Proficient (LEP) Individuals

1. Please describe the services your organization/program provides.
2. What languages are spoken within the communities you serve (list up to the 10 most common, including American Sign Language if applicable)?
3. Aside from Metro Nashville Public Schools (MNPS), what are the Metro departments with which your community and/or the community you serve most frequently interacts? (List of departments shown below)

<i>Agricultural Extension</i>	<i>Criminal Court Clerk</i>	<i>Justice Integration Systems</i>	<i>Public Health</i>
<i>Arts Commission</i>	<i>District Attorney General</i>	<i>Juvenile Court</i>	<i>Public Works</i>
<i>Assessor of Property</i>	<i>Election Commission</i>	<i>Metro Action Commission</i>	<i>Register of Deeds</i>
<i>Auditorium Commission</i>	<i>Emergency Communications</i>	<i>Nashville Career</i>	<i>Sheriff</i>
<i>Beer Permit Board</i>	<i>Farmer's Market</i>	<i>Advancement Center</i>	<i>Social Services</i>
<i>Circuit Court</i>	<i>Finance</i>	<i>Nashville Public Library</i>	<i>Soil and</i>
<i>Codes Administration</i>	<i>Fire</i>	<i>Office of the Trustee</i>	<i>Water Conservation</i>
<i>Convention Center</i>	<i>General Sessions Court</i>	<i>Parks and Recreation</i>	<i>State Trial Courts</i>
<i>Commission</i>	<i>Historical Commission</i>	<i>Planning Commission</i>	<i>Water Services</i>
<i>County Clerk</i>	<i>Human Relations</i>	<i>Police</i>	
<i>Criminal Court Clerk</i>	<i>Commission</i>	<i>Public Defender</i>	

4. In your current role, do **you personally** assist clients or community members in their interactions with Metro departments?
  - Yes
  - No
5. Excluding MNPS, with which Metro departments do **you personally** assist clients or community members?
6. How do **you personally** assist clients or community members in their interactions with Metro departments? (e.g., translating documents, interpreting, etc)
7. Do **your staff or other organization members** commonly assist clients or community members in their interactions with Metro departments?
  - Yes
  - No
8. Excluding MNPS, with which Metro departments do **your staff or other organization members** commonly assist clients or community members?
9. How do **your staff or other organization members** assist clients or community members in their interactions with Metro departments? (e.g. translating documents, interpreting)

10. For each Metro department with which your clients/community members have interacted, please describe the following:

- How easy are the interactions?
  - Not at all easy
  - Rarely easy
  - Sometimes easy
  - Usually easy
  - Always easy
  - Don't know
  - Not Applicable
- How likely is it that someone speaks the same language they do?
  - Very unlikely
  - Unlikely
  - Neutral
  - Likely
  - Very likely
  - Don't know
  - Not Applicable
- How likely is it that translation or interpretation services are available?
  - Very unlikely
  - Unlikely
  - Neutral
  - Likely
  - Very likely
  - Don't know
  - Not Applicable
- How easy is it to gain access to services if they do not speak English or if they use ASL?
  - Not at all easy
  - Rarely easy
  - Sometimes easy
  - Usually easy
  - Always easy
  - Don't know
  - Not Applicable

11. In your experience, how do the communities you serve overcome language barriers during interactions with Metro departments? What strategies do they use?

12. In your experience, in which Metro departments are translation/interpretation services essential but not yet adequately provided?

13. In your experience, are there Metro departments that consistently provide good services to LEP, deaf, and/or hard of hearing communities? Which ones? What examples of good services can you provide?
14. How does the community you serve typically find out about government services?
15. What other obstacles, if any, does the community you serve face to accessing Metro services?
16. Do you think multilingual signage in Metro facilities would be useful for the communities you serve?
  - Yes
  - No
17. One idea for improving services to LEP constituents is a telephone platform on which interpreters record transcripts for Metro forms in the languages most widely-spoken in Nashville. These recordings would explain what the forms are about and, if necessary, how to fill them out. Do you feel there is a need for a service like this?
  - Yes
  - No
18. Would this service assist your clients in engaging their government and participating in civic life?
  - Yes
  - No
19. Any additional comments or suggestions?
20. Is there anyone else you think might provide valuable input for this study?

**APPENDIX 3. MOST COMMON LANGUAGES  
ACCORDING TO COMMUNITY SURVEY  
RESPONDENTS**

Achi	Karen
African dialects	Kekchi
American Sign Language	Kinyarwanda
Amharic	Kirundi
Arabic	Kurdish
Bhutanese	Lao
Burmese	Mixteco
Cakchiquel	Nepali
Chin	Oromo
Chinese	Otomi
Chuj	Pashto
Creole	Purepecha
Dari	Quiche
Egyptian	Russian
English	Somali
Ethiopian	Spanish
Farsi	Swahili/Kiswahili
French	Thai
German	Urdu
Indian	Vietnamese
Italian	Zapotec
Japanese	Zomi

**APPENDIX 4.  
OTHER DEPTS/AGENCIES  
REPORTED BY COMMUNITY  
SURVEY RESPONDENTS**

Office of Family Safety  
English Learners Office  
Metro Student Attendance Center  
Metro Transit Authority  
MDHA  
DHS  
Metro Schools  
Children's Social Services  
Library Services for the Deaf and Hard of Hearing  
Department of Health  
Water  
Family and Children Services  
Vocational Rehabilitation  
Transportation/DMV  
Office of the Mayor  
Alignment Nashville  
Housing  
DCS  
EL Protector  
ADA Office  
Domestic Violence Division  
DIDD  
Disability Determinants  
Justice  
General Hospital  
Mayor's Office of New Americans

## **APPENDIX 5. ADDITIONAL COMMENTS FROM COMMUNITY SURVEY RESPONDENTS**

“If [we] can be any help, please contact us!”

“As far as I can tell, school translators are picking up a lot of slack in helping students access services. They appear to be doing a good job, but either we need more school translators or the agencies are going to have to start doing more translation. School translators and community partners will continue to be some of the most important referral sources for LEP individuals trying to access government services.”

“Visual, non-verbal signage would be more informative to the deaf and hard of hearing community. It would also be helpful to those who speak other languages. To explain forms to people who use sign language as their primary form of communication, it would be helpful to have all of the forms signed for each section. When I worked at Bridges for the Deaf and Hard of Hearing, we provided laptops with a signed explanation of each section of the forms that were used for our annual health fair. We do the same thing for fire fighters who go into homes of people who are deaf or hard of hearing to put up smoke detectors and check their homes for fire safety. They have a thumb drive of each item they plan to discuss in sign language, voice and captioning, making their job much easier.”

“I think signage in multiple languages is incredibly important! It not only helps people to understand rules and instructions, but it also creates a more inviting and welcoming environment.”

“It is important to not just know the language but also be aware of cultural barriers that might be in the way of accessing services. Metro employees should be educated on responding to other cultures and languages in a sensitive manner.”

“Interpretive services are needed badly - also providing literature in other languages would help”

“establish video remote interpreting (VRI) so that if an individual who is deaf needs services quickly, an interpreter may be available rather than having to wait or reschedule an appointment. The court system would not be a good candidate for such service but an agency such as DCS, DHS, would be.”



## APPENDIX 6. DOCUMENTS RELATED TO FOCUS GROUPS

### Metro Language Access Study: Community Focus Groups



#### *Participant Consent Form*

##### **What are we asking?**

You have been asked to take part in a study about language access in Metro government, particularly as it concerns Limited English Proficient (LEP), deaf, and/or hard-of-hearing communities. The purpose of this study is to identify how Metro government can better provide services to all constituents.

##### **Why have I been asked to take part?**

You are a member of/have significant contact with Limited English Proficient (LEP), deaf, and/or hard-of-hearing communities and can provide important insight into the challenges to accessing Metro services, as well as identifying areas in which Metro departments are succeeding in providing meaningful access to linguistic minorities.

##### **Voluntary Participation**

This discussion is *voluntary*—you do not have to take part if you do not want to. If any questions make you feel uncomfortable, you do not have to answer them. You may leave the group at any time for any reason.

##### **Privacy**

Your privacy will be protected. Your name will not be used in any report that is published. The discussion will be kept *strictly confidential*. The other participants in the group will be asked keep what we talk about private, but this cannot be assured.

##### **Audiotape Permission**

The discussion will be tape recorded only if all participants agree. The recording will only be used to remind staff of what was discussed. All recordings and transcriptions will be destroyed after the report has been published.

##### **Consent**

By signing this consent form, you are indicating that you fully understand the above information and agree to participate in this focus group.

Participant's signature: \_\_\_\_\_

Printed name: \_\_\_\_\_

Date: \_\_\_\_\_

## **Metro Language Access Study: Community Focus Groups**

### ***Introduction***

Over the past few months, we've been conducting the Metro Language Access Study, the goal of which is to produce a report that provides an accurate picture of the policies and procedures currently in place to assist linguistic minorities, as well as includes the community perspective.

For the next hour or so, we'll be talking about your community's interaction with Metro government. We're interested in learning about how people see Metro, what they know about it, and what Metro should know about your community. I have a short list of questions but this is designed to be a conversation led by the group.

### [DEMOGRAPHIC INFORMATION & CONSENT FORM]

Has anyone ever participated in a focus group?  
There are some guidelines:

- (1) We want everyone to participate
- (2) There are no right or wrong answers –We're interested in different opinions.
- (3) We respect confidentiality – especially if sensitive issues come up.

Any questions?

### ***Questions***

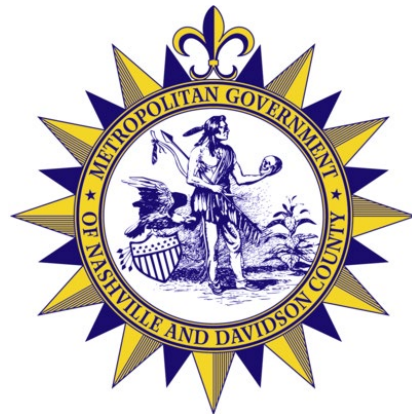
I want to start with introductions. Can you tell me your first name, how long you've lived in Nashville, and your favorite place to eat?

- (1) What do you think is the role of Metro government? [*What should a city provide?*]
- (2) What Metro services are most in demand by your community? [*Receive them adequately?*]
- (3) How does your community typically learn about Metro services? [*Agency? Online?*]
  
- (4) I have a list of Metro departments – take a few seconds to indicate the departments you're most familiar with.
  - a. How does your community typically interact with this department? For what reason?
  - b. Is language ever an issue?
  - c. Can you think of Metro departments where it is easy to get help if you don't speak English?
  - d. Are there Metro departments where it is more difficult?
  
- (5) Where do limited English speakers in your community go for help with Metro services?
- (6) What have been some of the consequences of language barriers for your community when trying to access Metro services?
- (7) In your experiences, what documents should be translated to provide better access to your community?
- (8) What do you think Metro needs to know so it can better serve the needs of your community, particularly those who speak limited English?

## Appendix B

# METRO NASHVILLE LANGUAGE ACCESS GUIDE & TOOLKIT

*ADA & TITLE VI RESOURCES*



*Guide created by:*

**Metro Human Relations Commission**

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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 in 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](mailto: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](mailto: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](mailto: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

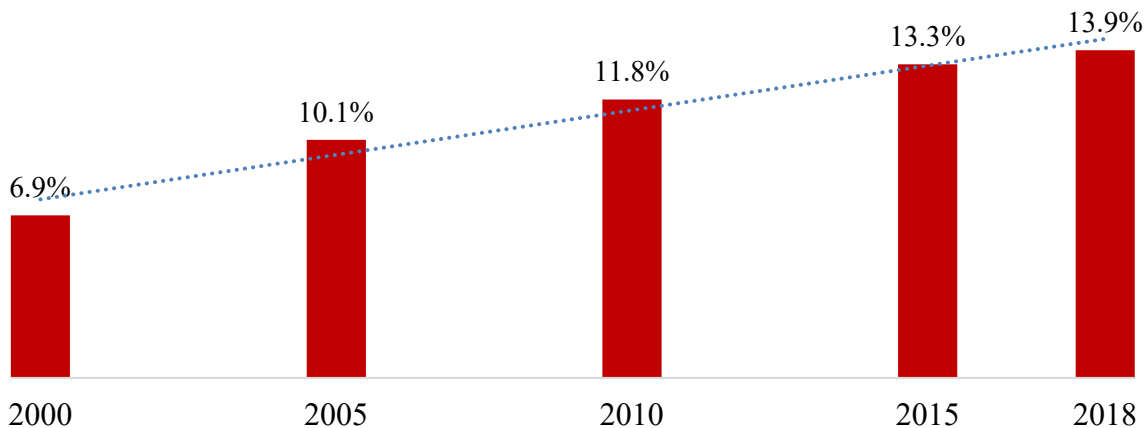
If your agency does not currently collect language information from your constituents, it might be useful to take a wider look at the distribution of Nashville.

### 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.

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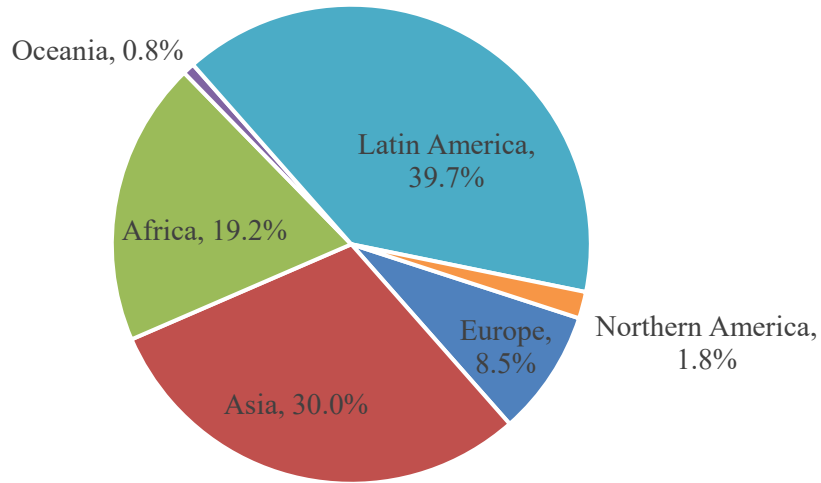
Figure 1. Foreign-born Population in Davidson County, 2000-2018



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

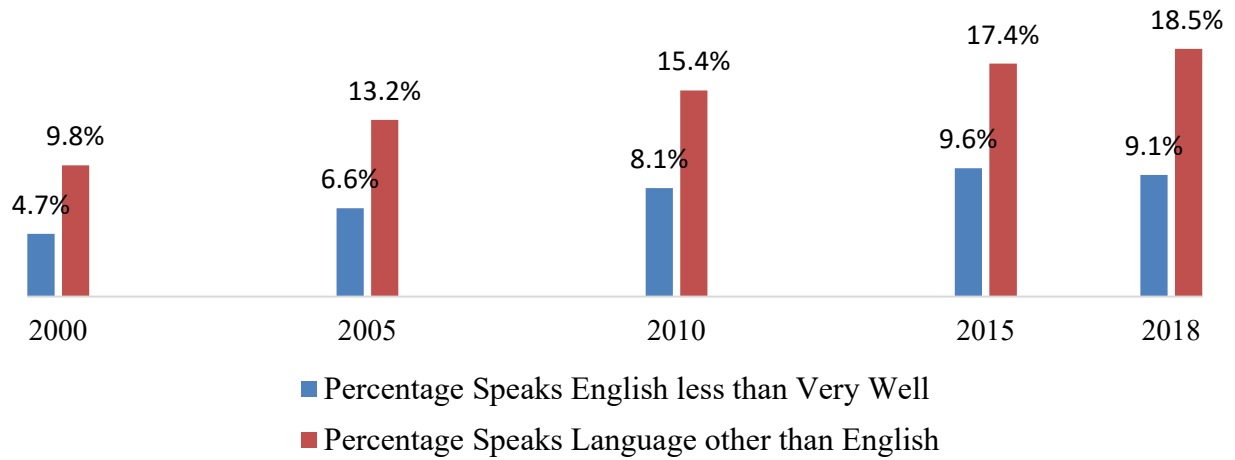


Source: US Census, American Community Survey, 2018, 1-year estimates

### 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

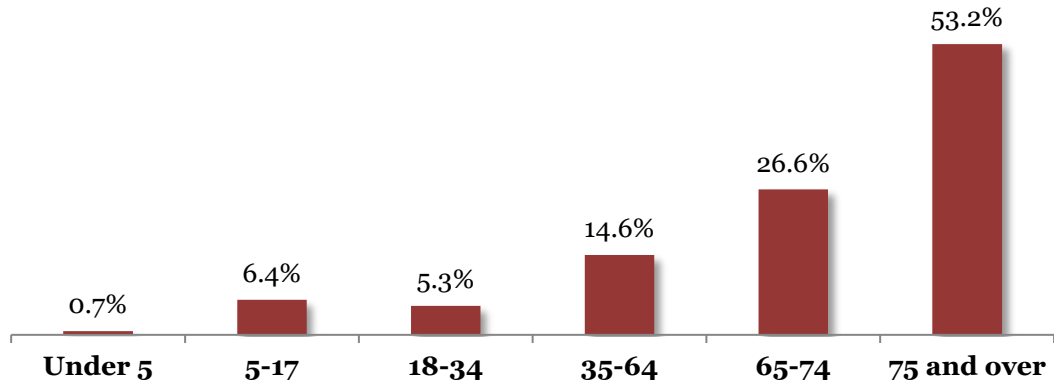
Population 18 to 34 years	207974	5161	2.5
Population 35 to 64 years	250993	12587	5
Population 65 years and over	85524	7303	8.5
Population 65 to 74 years	53170	3177	6
Population 75 years and over	32354	4126	12.8
With an ambulatory difficulty	(X)	35463	5.5
Population under 18 years	96714	285	0.3
Population 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  Via Correspondence  
 Telephonically  Other: (please specify)  
 Electronically (e.g. email or website) \_\_\_\_\_
  
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"/> Use of "I Speak" language identification cards or posters           |
| <input type="checkbox"/> Respond to individual requests for language assistance services                          | <input type="checkbox"/> Based on written material submitted to the agency (e.g. complaints) |
| <input type="checkbox"/> Self-identification by the non-English speaker   | <input type="checkbox"/> We have not identified linguistic minorities                        |
| <input type="checkbox"/> Ask open-ended questions to determine language proficiency on the telephone or in person | <input type="checkbox"/> Other (Please specify):<br>_____                                    |

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"/> Not Sure     |
| <input type="checkbox"/> Biennially | <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"/> Community Organizations |
| <input type="checkbox"/> US Dept. of Education | <input type="checkbox"/> Intake information      |
| <input type="checkbox"/> US Dept. of Labor     | <input type="checkbox"/> Other: _____            |
| <input type="checkbox"/> State Agencies        |  |

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?

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? | <input type="checkbox"/> Yes  | <input type="checkbox"/> No  |
| 17. What data, if any, do you maintain regarding language assistance services? (Select all that apply)  | <input type="checkbox"/> Primary language of persons encountered or served<br><input type="checkbox"/> Use of language assistance services such as interpreters and translators<br><input type="checkbox"/> Funds or staff time spent on language assistance services | <input type="checkbox"/> Number of bilingual staff<br><input type="checkbox"/> Cost of interpreter services<br><input type="checkbox"/> Cost of translation of materials into non-English languages<br><input type="checkbox"/> Other (Please specify):<br><hr style="width: 100px; margin-left: 0;"/> |
| 18. Does your agency have a system to track the cost of language assistance services?   | <input type="checkbox"/> Yes  | <input type="checkbox"/> No  |

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

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)

<input type="checkbox"/> Management or senior staff	<input type="checkbox"/> Bilingual Staff
<input type="checkbox"/> Employees who interact with or are responsible for interactions with linguistic minorities	<input type="checkbox"/> New employees
	<input type="checkbox"/> All employees
	<input type="checkbox"/> Volunteers
	<input type="checkbox"/> Others (Please specify):
	<input type="checkbox"/> _____
	<input type="checkbox"/> 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"/> Social networking website (e.g. Facebook, Twitter) |
|   | <input type="checkbox"/> Posters in public areas  | <input type="checkbox"/> E-mail to individuals or a list serv               |
|   | <input type="checkbox"/> "I Speak" language identification cards distributed to frontline staff | <input type="checkbox"/> Other (Please specify): _____                      |
|   | <input type="checkbox"/> Website  | <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?  Annually  Not Sure  
 Biennially  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?  Annually  Not Sure  
 Biennially  Other: \_\_\_\_\_
48. Does your agency have a language access coordinator?  Yes  No
49. Does your agency have a formal language access complaint process?  Yes  No
50. Has your agency received any complaints because it did not provide language assistance services?  Yes  No
51. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?  Yes  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?  Yes  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
Language Training Center	In Person and document	Hayley Guest	hguest@ltcls.com	317-813-9790	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
<b>Type of Translation (Telephonic, Face-to-Face, Document)</b>			
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
<b>Type of Translation (Telephonic, Face-to-Face, Document)</b>			
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
<b>Type of Translation (Telephonic, Face-to-Face, Document)</b>			
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

## Language Training Center

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

Item No.	Description	Cost Per Unit	Unit of Measure
<b>Type of Translation (Telephonic, Face-to-Face, Document)</b>			
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
<b>Type of Translation (Face-to-Face, Document)</b>			
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

Document Translation

Item No.	Description	Cost Per Unit	Unit of Measure
<b>Type of Translation (Telephonic, Face-to-Face, Document)</b>			
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

SERVICE DESCRIPTION	Rate	COMPENSIBLE UNITS
<b>Interpreter's service</b>		
Sign Language Interpreting (standard)	\$ 52.00	hour *
Sign Language interpreting (Legal)	\$ 65.00	hour *
Sign Language interpreting (with parking) two-hour minimum Travel, mileage, and parking are included in per hour rates	\$ 104.00	hour *
Sign Language interpreting outside normal working hours	\$ 60.00	hour *
Sign Language interpreting (Emergency)	\$ 52.00	hour *

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](mailto: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)



(ASL)

Ez kurdî dipeyvîm  
(Kurdish)

म नेपाली बोल्छ  
(Nepali)

Je parle Français  
(French)

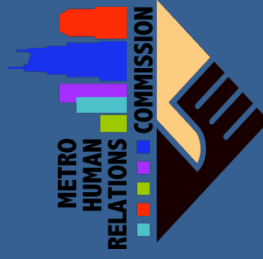
Ninasema  
Kiswahili  
(Swahili)

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, contact [ADA@nashville.gov](mailto:ADA@nashville.gov) (615)862-8744

Metro Human Relations Commission [mhrc@nashville.gov](mailto:mhrc@nashville.gov) (615)880-3370



## Appendix C



# Juvenile Court

METROPOLITAN NASHVILLE & DAVIDSON COUNTY

## I Speak Statements

- |  |  |
|--|--|
| <input type="checkbox"/> Unë flas <b>shqip</b> (Albanian)                    | <input type="checkbox"/> N a po <b>Klào</b> Win. (Kru)                             |
| <input type="checkbox"/> አግርኛ እናገራለሁ (Amharic)                               | <input type="checkbox"/> ຂ້າພະເຈົ້າເວົ້າ ພາສາລາວ. (Lao)                            |
| <input type="checkbox"/> انا اتكلم اللغة العربية. (Arabic)                   | <input type="checkbox"/> Yie gorngv <b>Mienh</b> waac. (Mien)                      |
| <input type="checkbox"/> Ես խոսում եմ <b>հայերեն</b> (Armenian)              | <input type="checkbox"/> म <b>नेपाली</b> बोल्छु (Nepali)                           |
| <input type="checkbox"/> আমি বাংলা ভাষী। (Bengali)                           | <input type="checkbox"/> Mówię <b>po polsku</b> . (Polish)                         |
| <input type="checkbox"/> Ja govorim <b>bosanski jezik</b> (Bosnian)          | <input type="checkbox"/> Eu falo <b>Portugês</b> . (Portuguese)                    |
| <input type="checkbox"/> ကျွန်တော်ပြန်ဟောတာပြောသည်။ (Burmese)                | <input type="checkbox"/> ਇ ਸ੍ਰਪੇਅਕ ਪੰਜਾਬੀ (Punjabi)                                |
| <input type="checkbox"/> 我说中文 (Chinese Simplified)                           | <input type="checkbox"/> Cunosc limba <b>Română</b> . (Romanian)                   |
| <input type="checkbox"/> 我說中文 (Chinese Traditional)                          | <input type="checkbox"/> Я говорю <b>по-русски</b> . (Russian)                     |
| <input type="checkbox"/> Ja govorim <b>hrvatski</b> . (Croatian)             | <input type="checkbox"/> Ou te tautala <b>faaSamoa</b> . (Samoan)                  |
| <input type="checkbox"/> اینجانب به زبان فارسی صحبت می کنم (Farsi)           | <input type="checkbox"/> Govorim <b>srpski</b> . (Serbian)                         |
| <input type="checkbox"/> Je parle <b>français</b> . (French)                 | <input type="checkbox"/> Waxaan ku hadlaa <b>Somali</b> . (Somali)                 |
| <input type="checkbox"/> Je parle le <b>Français haïtien</b> (French Creole) | <input type="checkbox"/> Yo hablo <b>español</b> . (Spanish)                       |
| <input type="checkbox"/> Μιλάω <b>ελληνικά</b> . (Greek)                     | <input type="checkbox"/> أتحدث <b>السودانية</b> (لغوي سوداني) (Sudanese)           |
| <input type="checkbox"/> ຂໍ ງຽຮາຕິ ອິລຼຸ ອຸ່ (Gujarati)                      | <input type="checkbox"/> Marunong po akong magsalita ng <b>Tagalog</b> . (Tagalog) |
| <input type="checkbox"/> Mwen pale <b>Kreyòl</b> . (Haitian Creole)          | <input type="checkbox"/> ข้าพเจ้าพูด ภาษาไทย (Thai)                                |
| <input type="checkbox"/> म <b>हिंदी</b> बोलता हूँ (Hindi)                    | <input type="checkbox"/> አካ ትግርኛ ይዘረብ እየ. (Tigrinya)                               |
| <input type="checkbox"/> Kuv hais <b>lus hmoob</b> . (Hmong)                 | <input type="checkbox"/> Я розмовляю <b>українською</b> . (Ukrainian)              |
| <input type="checkbox"/> Ana m a sụ <b>Igbo</b> (Igbo)                       | <input type="checkbox"/> میں اردو بولتا/ بولتی ہوں - (Urdu)                        |
| <input type="checkbox"/> Parlo <b>Italiano</b> (Italian)                     | <input type="checkbox"/> Tôi nói tiếng <b>Việt</b> . (Vietnamese)                  |
| <input type="checkbox"/> 私は <b>日本語</b> を話します (Japanese)                      | <input type="checkbox"/> <b>יידיש</b> אדאן (Yiddish)                               |
| <input type="checkbox"/> Mi chat <b>Jamiekan langwjjj</b> (Jamaican Creole)  | <input type="checkbox"/> Mo gbọ <b>Yoruba</b> (Yoruba)                             |
| <input type="checkbox"/> <b>ykt ikqhlil b</b> (Karen)                        |  |
| <input type="checkbox"/> ខ្ញុំនិយាយភាសាខ្មែរ (Khmer)                         |  |
| <input type="checkbox"/> 본인의 모국어는 <b>한국어</b> 입니다 (Korean)                    |  |
| <input type="checkbox"/> نه ز زماني كوردی ده ناخفم. (Kurdish)                |  |