

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

The University of Tennessee's procedures and plans utilize several resources to deliver LEP services. Equity and Diversity offices at each campus/institute have information about Avaza Language Services Corporation, a company that offers interpreting services. The Equity and Diversity officers make the Avaza information available to anyone at the University who is involved in the delivery of LEP services. In addition, the Avaza information has been shared with all UT Health Science Center (UTHSC) clinics and county extension offices. This information includes Avaza language cards to which a LEP person can point to identify his or her primary language. Under UTHSC supervision, all clinical supervisors know to contact the UTHSC Equity and Diversity officer if they encounter any LEP issues.

The University's Chattanooga, Knoxville and Martin campuses each have Centers for International Education. These Centers provide many services to the international community, including opportunities for cultural and language exchange between students, faculty, and other members of the university community from around the world. The Centers routinely engage international students and faculty to provide translation services or to facilitate communication with LEP individuals. The Centers are the primary resources by which UT delivers LEP services to the University community. Because of the depth and breadth of the University's ability to provide translation services, arrangements through the Centers occur on an informal, ad hoc basis, and the University has no means of tracking the frequency with which LEP services are provided through the Centers or the native languages that are spoken by the individuals requesting LEP services.

The University's campuses in Knoxville, Chattanooga, and Martin each have academic departments of foreign languages. These departments have faculty members who are fluent in many languages. The faculty members also provide ad hoc LEP services within the University community and are available to the Equity and Diversity offices if needed.

On occasion, a campus Equity and Diversity office will receive a request for LEP services. The chart below outlines the statistics of such requests for the past fiscal year.

**Language Interpretation Requests with Language Encountered**

	Campus/Institute Language Encountered	Number of Languages Encountered	Number of Requests	Phone	In Person	Written
4	Chattanooga	1				5
5	Spanish		8			
6	Institute for Public Service	0	0	0	0	0
7	Institute of Agriculture	17		290	30	1508
8	Arabic		47			
9	Burmese		12			
10	Chinese		22			
11	French		2			
12	Hebrew		1			
13	Hindi		26			
14	Korean		2			
15	Kurdish		20			
16	Malay		2			
17	Mong		75			
18	Nepali		1			
19	Portuguese		51			
20	Russian		1			
21	Spanish		2176			
22	Tanzanian		1			
23	Vietnamese		1			
24	Knoxville	0	0	0	0	0
25	Martin	14				
26	Arabic		121			
27	Chinese		18			
28	French		2			
29	German		3			
30	Indian		4			
31	Korean		8			
32	Mandarin		24			
33	Portugese		5			
34	Russian		2			
35	Slovenian		2			
36	Spanish		2			
37	Swahili		2			
38	Thai		1			
39	Turkish		1			
40	Memphis (Health Science Center)	3		7		
41	Arabic		3			
42	Somali		1			
43	Vietnamese		1			
44	Space Institute (Tulahoma)	2				3
45	Russian		1			
46	Spanish		1			
47	System Administration	0	0	0	0	0
48	<b>Total</b>	<b>37</b>	<b>2650</b>	<b>297</b>	<b>30</b>	<b>1516</b>

The University has translated into Spanish its Title VI brochure, E-verify poster, Right to Work poster, and a Study in US Program letter (Appendix B). When translation of other documents is needed, the University will request that the document be translated into the requested language by either an internal bilingual staff member or by Avaza. Original documents being submitted for translation will be in final, approved form.

The University believes that its delivery of LEP services is thorough and effective. The University’s primary points of contact with the general public are its clinics and its extension offices. The University will continue to ensure that it makes those clinics and offices aware of the University’s LEP services, including the availability of Avaza’s services.

The University’s LEP policy and procedures may be found on the following pages.

## ***Limited English Proficiency Compliance***

The University of Tennessee seeks to fulfill its responsibility under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. to provide meaningful access to programs and activities by persons with Limited English Proficiency (LEP). The University of Tennessee is a complex organization with four campuses, multiple institutes, and many additional services, including an agricultural extension service that provides programming in all 95 counties of the state. As a result, reasonable steps to ensure meaningful access to programs and activities by LEP persons vary wide according to the specific circumstances.

The most basic activities of the University of Tennessee are to provide educational service to its students and to support teaching and research by its faculty. The University evaluates the English language proficiency of its students and teaching faculty and provides various forms of assistance depending upon each fact-dependent circumstance. In some situations, students who need assistance in written English may be placed in special writing classes. In other instances, a student's studies may be delayed while they attend intensive English language programs. Certain offices may offer special training to assist faculty whose first language is not English. The University makes many of its written communications, especially posters concerning the rights of employees under Title VI, available in English and Spanish.

The University delivers services directly to the public primarily through its clinics and agricultural extension offices. Those offices provide, without cost, the following services:

### **1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

The University will promptly identify the language and communication needs of the LEP person. If necessary, staff will use the language identification card provided by Avaza language services to determine the language. In addition, when records are kept of past interactions with individuals or their family members, the language used to communicate with the LEP person will be included as part of the record.

### **2. OBTAINING A QUALIFIED INTERPRETER**

Supervisors over clinics and extension offices across the state have been informed to contact their Title VI coordinator if the need arises for language translation services. They have been supplied with the Avaza language identification card. Moreover, they have been asked to notify their Title VI coordinator, who is responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
- (b) If a bilingual staff member is available from the University's foreign language departments, that staff member will be asked to assist in verbal or written communications, depending on the circumstances;
- (c) If a bilingual staff member is not available, the Title VI coordinator will contact Avaza and arrange for language translation services.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department or agency. Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children (e.g. persons under the age of 18) will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

### **3. PROVIDING WRITTEN TRANSLATIONS**

The University makes its Title VI brochure available in Spanish. When translation of other documents is needed, the University will request that the document be translated into the requested language by either an internal bilingual staff member or by Avaza. Original documents being submitted for translation will be in final, approved form.

### **4. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION**

The University continues to assess the need for providing more formal LEP assistance to the general public. In addition, the University will continue to evaluate its procedures for securing outside interpreter services, complaints filed by LEP persons, and feedback from the public and University community.

Individuals who believe they have not been provided meaningful access under Title VI may file a complaint with the campus Title VI officer. Retaliation of any kind against a person who has filed a complaint is prohibited.