



Policy on Limited English Proficiency

Responsible Official: **Compliance Counsel**

Responsible Office: **Office of University
Counsel**

Policy Purpose

This policy describes how East Tennessee State University (ETSU), as a recipient of federal funds, under Title VI of the Civil Rights Act of 1964, fulfills its obligation to take reasonable steps to provide Limited English Proficiency (LEP) persons with meaningful access to ETSU activities, programs, and services.

Policy Statement

ETSU will take reasonable steps to ensure accurate and effective communication with LEP persons. ETSU will provide LEP persons with language assistance resulting in an equal opportunity to participate in ETSU services, activities, programs and other benefits. ETSU will provide all interpreters, translators, and other aids needed to comply with this policy without cost to persons accessing services.

When ETSU encounters LEP persons in the form of international students, faculty, staff, or other individuals seeking services and access to support programs, the following will apply:

- I. ETSU will promptly identify the language and communication needs of an LEP person who makes himself/herself known to the institution.
- II. ETSU may utilize outside language resources, such as Linguistica International, to provide LEP services.
- IV. The ETSU Language and Cultural Resource Center may provide LEP persons with translation and interpretation services, when appropriate, based on their needs.
- V. The ETSU Office of Disability Services may provide resources for LEP persons where appropriate, including those who require American Sign Language (ASL) translation.
- VI. To ensure compliance under the 1964 Civil Rights Act, The ETSU Language and Cultural Resource Center and any other University department that makes contact with an LEP

individual shall forward, on the last day of every month, all records of LEP contacts to the [ETSU Office of University Compliance](#).

- VII. ETSU will conduct a regular review of the language access needs of our LEP population, as well as update and monitor the implementation of this policy and these procedures, as necessary.
- VIII. Individuals who believe they have not been provided reasonable access to LEP services may file a complaint with the Office of University Compliance. Individuals may also file with the appropriate external agency. External agencies have deadlines to file complaints. It is an individual's responsibility to know those deadlines. Please consult directly with the external agency to determine if there is a time limitation or deadline for filing your complaint.

Authority: T.C.A. § 49-8-203; Civil Rights Act of 1964, as amended, Title VI implementing regulations, and Executive Order 13166.

Previous Policy: TBR Policy Limited English Proficiency: G-130

Definitions

Limited English Proficiency.	The Department of Justice defines persons with LEP as "those individuals who have a limited ability to read, write, speak or understand English." Because English is not the primary language of these individuals, they may have a limited ability to function in a setting where English is the primary language spoken, such as at ETSU. These individuals may be entitled language assistance with respect to a particular type of service, benefit, or encounter.
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Policy History

Effective Date: 3/14/2022

Revision Date:

Procedure

I. How to File a Title VI Complaint

- A. Anyone who believes discrimination has occurred related to limited English proficiency (LEP) may file a complaint under the ETSU [Discrimination, Harassment, and Sexual Misconduct Policy](#). You may report Discrimination, Harassment and/or Retaliation through the University's [Online Reporting Portal](#), but online reporting is

not required. All complaints must include the following information:

- the name of the complainant;
- an explanation of the action or conduct complained of; and
- the person or department responsible for the action.

ETSU discrimination complaints should be directed to:

Garrison Burton, Title VI Coordinator
109 Burgin Dossett Hall
423-439-8544

- B. External Agency – In addition to the University's complaint process, complaints may also be filed with the Tennessee Human Rights Commission at 1-800-251-3589 or online at: [Human Rights Commission \(tn.gov\)](http://www.tn.gov/humanrights)

II. Accessing Language Assistance Resources

To provide language assistance, ETSU has contracted with Linguistica International, which offers the following services in over 350 languages:

- Telephone Interpreting (Including multi-caller support)
- On-Site Interpretation (Specialized interpreters by industry)
- Conference Simultaneous Interpreting
- Secure Video Remote Interpreting (VRJ) (Android, iOS, Windows, Mac, and Linux clients available)
- American Sign Language Interpretation (ASL) (Onsite and VRI)
- Document Translations
- Voiceovers, Subtitles and Multilingual Voice Talent
- Cultural and Country Specific Training

Linguistica International also provides language cards to help a LEP person identify his or her primary language. The Office of University Compliance and University Counsel have made language cards available electronically to ETSU Provosts, Vice Presidents, Deans and campus locations such as clinics, etc., for dissemination to service areas on campus and for posting in highly visible locations. Examples of these locations include:

- Front office areas and waiting rooms, both in administrative and service areas (e.g., ETSU health services offices)
- Faculty and staff offices
- General notice boards in academic and administrative buildings

Some ETSU clinical sites also advertise the free services provided by third parties to their clients. The University will also make any ETSU document available in the preferred language of a LEP beneficiary at his or her request. Linguistica International will provide document

translation service.

A list of Translation and Interpretation Services provided by ETSU's Department of Language and Cultural Resource Center of can be found [here](#).

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