Metropolitan Government of Nashville and Davidson County

2026 Title VI

Compliance Implementation Report

Mayor Freddie O'Connell

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INTRODUCTION

Title VI is a federal law which requires the non-discriminatory delivery of services which are supported by federal financial assistance. It prohibits discrimination on the basis of race, color, or national origin. Other civil rights laws prohibit discrimination based on gender, age, and disability.

THE OFFICE OF THE MAYOR

Freddie O'Connell is the tenth mayor of the Metropolitan Government of Nashville and Davidson County. Born and raised in Nashville, Mayor O'Connell served as a member of Metro Council from 2015 to 2023 and brings to public service decades of experience limiting the impact of poverty, strengthening neighborhoods, and ensuring that everyone participates as our economy grows.

The mission of the Mayor's Office is to serve the citizens of Davidson County by directing the executive and administrative functions of the Metropolitan Government through collaborative outreach and engagement while ensuring the local government operates in an efficient, transparent, and fiscally responsible manner.

OFFICES AND RESPONSIBILITIES

Executive Office

The Executive Office is led by the Deputy Mayor/Chief of Staff, who coordinates the Mayor's staff and policy, and the Mayor's Chief Operating Officer, who coordinates Metro departments and agencies. The Executive Office is comprised of functions that serve and support the entire Mayor's staff: education, event support, legislative relationships, health and wellness and youth, as well as security and administrative support staff.

Office of Performance Management

The Office of Performance Management is responsible for tracking impactful and relevant operating performance variations, identifying items that require immediate attention, and supporting data-based decision making. The OPM goal is to strengthen transparency and accountability within Metro by developing a metro-wide culture of ongoing performance reporting.

Shifting from on-demand analysis to continuous performance tracking, OPM has developed a set of measures within each department. OPM creates and maintains public dashboards that showcase the variety of metrics monitored by the team.

Office of Communications

The Office of Communications is focused on informing the public of developments, objectives, and announcements by the administration and the efforts to implement the Mayor's vision. This is done primarily through engagement with the media, responding to inquiries and proactively providing information, as well as engaging in direct communication with the public through press releases, emails, social media, videos, letters, and flyers. The Office further assists the Mayor in preparing public remarks for events throughout the community while coordinating production of photos and videos from these events.

Office of Neighborhoods and Community Engagement

The Office of Community Engagement works to build strategic partnerships in the public, private, and non-profit sectors that will improve neighborhoods throughout Davidson County coupled with designing a strategic plan to make community resources and services more accessible. The OCE serves as a direct link between the Mayor's Office, resources, and our neighbors to regularly work together to solve big or small issues. Ways to move this forward will be through programs and initiatives such as MyCity Academy and the Neighborhood Ambassador Academy, which will give Nashvillians the tools to solve complicated problems and how to leverage city government. Organized neighborhoods provide accountability and plans to empower the citizens to make Nashville accessible and beneficial for all.

Office of New Americans

The Mayor's Office of New Americans (MONA) works to improve the lives of Nashville's immigrant and refugee communities by engaging them in decisions regarding Nashville's future, empowering them to participate in our government and our community, and improving the city's programs and services to meet the needs of these new constituents, as well as *all* Nashvillians.

Nashville is a welcoming city where diversity, equity, and inclusion is valued and prized. MONA does not inquire about citizenship status, but rather serves all residents, regardless of immigration status.

Office of Constituent Services

The Office of Constituent Services is committed to being the liaison between the Mayor's Office and the community. Office duties include responding to constituent phone calls on behalf of the Mayor, answering emails submitted to the mayor@nashville.gov email address, and working closely with the HUB Nashville portal to address constituent service needs.

The Office further assists other staff members by providing constituent services information and counsel. The Office Director attends neighborhood meetings and community gatherings on behalf of the Mayor and works closely with the Mayor's scheduler. The Office falls under the umbrella of the Office of Community Engagement.

Office of Sustainability and Resilience

The Mayor's Office of Sustainability and Resilience works to preserve our region's natural resources, implement more sustainable, efficient, and environmentally friendly development and policies, and incorporate sustainability throughout all operations of Metro Government and the city at-large. The office further leads citywide efforts to help Nashville prepare for, withstand, and rebound from acute 'shocks' – catastrophic events like floods, tornadoes, and fires – and 'stresses' – chronic slow-moving issues like affordable housing, poverty, and inequality. The Mayor has prioritized economic inclusion and equity as a lens for building urban resilience. The office works across city departments and the community to develop and implement policies and programs that ensure Nashville is ready to respond to disasters, whether economic or environmental.

Office of Legislative Affairs

The Office of Legislative Affairs works with organizations, non-profits, and other individuals and entities, including accessing a wide range of community events, to promote Metro policies and initiatives and derive feedback and input for effective government. Significantly, this includes the coordination of the process whereby qualified residents are identified for and appointed to Metro Boards and Commissions.

Office of Film and Special Events

The Office of Film and Special Events reviews applications for film, special event, and parade permit requests. A primary function of the office is to facilitate the approval process for permit applicants by coordinating communication between the applicant and staff at multiple other Metro departments (*e.g.*, Police, Fire, Parks, OEM, WeGo, NDOT, General Services, Beer Board). The office also provides regular updates to the applicant and Metro staff involved in the approval process about the permit status of the event. When all the permit request requirements have been met, a permit is issued to the applicant.

Office of Economic and Community Development

The Mayor's Office of Economic and Community Development (ECD) assists the Mayor in recruiting new businesses to the city, helping existing businesses expand, and working to ensure all Nashvillians can participate in the city's success. The ECD works with government and community partners to promote workforce development and works with businesses of all sizes and types – from new entrepreneurial ventures to re-locations of global businesses.

THE METROPOLITAN COUNCIL

The Metropolitan Council is the legislative body of Nashville and Davidson County. Members are elected to serve a term of four years. There is one Vice-Mayor, five council members-at-large, and thirty-five district council representatives. Specific information on the Metropolitan Council can be found in Article 3 of the Metropolitan Charter.

The Metropolitan Council meets regularly on the first and third Tuesdays of each month at 6:30 p.m. Meetings are open to the public and are held in the Historic Courthouse at One Public Square, Suite 204.

Meetings on the first Tuesday of every month except June (which is reserved for budget public hearings) are reserved for public hearings on bills on zoning matters. The Vice-Mayor presides over these meetings. Agendas of the Council meetings and minutes of prior meetings are prepared by the Metropolitan Clerk's Office. Appendix C provides a listing of Metropolitan Council members for the 2023-2027 term.

THE DEPARTMENTS OF THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY AND FUNCTIONS

Metro delivers services and performs operations through the activities and functions of its departments, boards, commissions, and other elected offices. The following provides detail with regard to Metro's Executive Departments, semi-autonomous agencies, boards and commissions, and other elected officials which comprise the Metropolitan Government of Nashville and Davidson County. See Appendix C for an organizational chart of the structure of the Operating Departments.

Codes Administration

The Codes Department provides direction and coordination of departmental policy and support for the operating programs. This includes the licensing of Electrical, Plumbing, and Mechanical/Gas contractors, and serving as secretary to six administrative boards.

The mission of the Department of Codes & Building Safety is to provide permit, inspection, enforcement and information products to the Nashville Community so they can experience safe buildings and improved quality of life.

Criminal Justice Planning Unit

The goal of CJP is to provide data to the criminal justice policy makers in order for them to make informed decisions in planning for the future of our criminal justice system.

CJP's focus is to meet data requests for current and future planning of our criminal justice system. We provide data in forecasting for future jail beds. Other reports provide annual, quarterly, monthly, weekly and daily information to help our system run efficiently from arrest to final disposition of cases. We provide Ad Hoc reports for unique questions that are asked on our system.

Emergency Communications

The Operations Division of the Department of Emergency Communications Center consists of the dispatchers who are the voice on the other end of the phone calls made to 9-1-1, 862-8600, and a number of other public safety emergency numbers within Metro. They are also the voice on the other end of the radio for Metro's Police and Fire field personnel. MNPD and NFD field personnel receive calls for service from ECC telecommunicators, who provide the informational support work needed to complete those calls.

The mission of the Department of Emergency Communications Center is to enhance the quality of life for all citizens in our community by processing all 9-1-1 calls and by the dispatching of appropriate emergency responders in an expeditious, courteous, and professional manner: thereby saving lives, protecting property, curbing crime, and preventing major fire losses.

Finance

We provide fiscal and strategic guidance to serve the Nashville community and support city leadership. Through informed decision-making and thoughtful partnership, we build trust, innovate, secure long-term financial stability, and strengthen Nashville as a place to live, work, play, and invest.

Fire

The mission of the Nashville Fire Department is to provide high quality fire, medical, and rescue emergency responses and community support services to the citizens and visitors within Nashville and Davidson County, so they can work and reside in a community where an all-hazard response minimizes harm to life, property and environment.

General Services

The Department of General Services delivers an array of services to all departments and agencies of the Metropolitan Government of Nashville and Davidson County so that they are able to focus and achieve their own missions.

Human Resources

Metro Human Resources is committed to assisting our customers, both internal and external, by providing administration, information, and support in such areas as recruitment, compensation, benefits, safety, injury on duty, veteran benefit services, training, workforce culture, and employee relations.

Our goal is to recruit and retain a highly qualified and diverse municipal workforce, provide opportunities that promote professional development and to foster a safe, healthy, and productive work environment that will allow us to provide quality services to the public.

Information Technology Services

The mission of the Information Technology Services (ITS) Department is to lead the delivery of exceptional technology, service, and solutions.

Law

The Legal Department provides complete legal advice and representation to all levels of the administrative, legislative and operational divisions of The Metropolitan Government of Nashville and Davidson County. The Department provides legal counsel to all Metro departments, agencies, and commissions; handles all litigation involving the Metropolitan Government; provides legal counsel to the Mayor, Council, and other Metropolitan officials; acts as a liaison with other governmental agencies on legal issues; administers insurance and safety program to identify, analyze, evaluate and make recommendations for treatment of loss risks; and provides loss prevention services.

Police

The Police Department is charged with enforcing the law and to protect the general public in accordance with the provisions of the Metropolitan Charter and ordinances.

The mission of the Police Department is to provide community-based police services through crime prevention strategies and partnerships, to ensure a safe and peaceful Nashville. In carrying out its mission, the members of the Police Department will continue to value:

- organizational excellence and professionalism
- the impartial enforcement of the law
- the people we serve and each other
- problem-solving partnerships
- open communication
- ethics and integrity

Nashville Department of Transportation and Multimodal Infrastructure

Nashville Department of Transportation and Multimodal Infrastructure (NDOT) builds and manages a safe, reliable public network which elevates the quality of life and prosperity in Davidson County.

Water Services

Water Services works to provide quality water services at an economical price, including construction, operation and maintenance of all water and sanitary sewerage facilities of the Metropolitan Government and for the collection of all charges for the services of such utilities.

SEMI-AUTONOMOUS AGENCIES, BOARDS, AND COMMISSIONS

Metro delivers services and performs operations through the activities and functions of its agencies, boards, commissions, and other elected offices. The following provides detail with regard to Metro's Semi- autonomous agencies, boards, and commissions. Only those entities supported by the Metro Budget are listed below.

Agricultural Extension

The Smith-Lever Act of 1914 established the Agricultural Extension Service (AES). It is the off-campus educational unit of two land grant universities (The University of Tennessee and Tennessee State University). Agricultural Extension Service provides informal educational programs in agriculture, horticulture, family and consumer sciences, and supports and organizes 4-H programs.

The mission of the Agricultural Extension Service is to help people improve their lives through education, using research-based information focused on issues and needs.

Arts Commission

Administrative staff serves as the liaison with the Commission, the Office of the Mayor, and Metro Council. The staff is responsible for budget preparation; seeking outside funding from regional, state, and national sources; overseeing public information programs; planning and managing the department's finances; coordinating Commission and committee work; and engaging in cultural planning and research pertaining to public policy issues.

The mission of the Metropolitan Nashville Arts Commission is to provide leadership that stimulates and advances the arts to enrich the human experience for the community. In order to create a vibrant, vigorous, healthy community where all the arts flourish and grow, the Arts Commission's goals are to promote organizational stability and growth, foster excellence, generate awareness, increase accessibility, respond to diverse community needs, and facilitate cooperation and partnerships.

Auditorium Commission

The Nashville Municipal Auditorium is a public-service oriented entertainment facility that seeks to attract a broad spectrum of events for the Nashville community and the Middle Tennessee area.

Beer Permit Board

The Metropolitan Beer Permit Board shall have jurisdiction of the licensing, regulating and controlling of the transportation, storage, sale, distribution, possession, receipt and/or manufacturer of beer of an alcoholic content of not more than eight percent by weight or any other beverage of like alcoholic content, and shall constitute the sole administrative agency in the Metropolitan Government for the administration of all laws, and ordinances relating to beer and like alcoholic beverages.

The Metropolitan Beer Permit Board consists of seven members. Four members appointed by the Mayor and approved by the Metropolitan Council. Three members elected by a majority vote of the whole membership of the Metropolitan Council. Members serve a four-year term.

Six dedicated staff members manage the application and permitting process, ensuring compliance with beer laws, rules, and regulations. They work together with the Metro Nashville Police, Health and Codes Departments, Fire Marshal's Office, Mayor's Office of Nightlife, and several state and federal agencies. This thoughtful partnership focuses on training and inspections to help ensure compliance in a supportive manner.

Community Review Board

The mission of the Community Review Board (CRB) is to provide an accessible, respectful, independent and effective forum for community participation in the investigation and resolution of complaints of Metropolitan Nashville Police Department ("MNPD") misconduct; to examine and issue policy recommendations regarding local law enforcement policies and practices; to encourage open and constructive communication and cooperation between local law enforcement and Metro's residents; and to protect civilians' rights and promote professionalism and best practices in the MNPD, enhancing community-police relations and creating a safer Nashville. The CRB staff, Metro Nashville Community Oversight (MNCO), is managed by the Executive Director. The Executive Director and staff handle all administrative, fiscal, legal and program areas of the Board.

Election Commission

The Election Commission was created to maintain voter registration files and conduct all elections for Davidson County (Federal, State, and Metro) and the six incorporated satellite cities within Davidson County. The Commission is governed by five commissioners appointed by the State Election Commission for two-year terms. The commissioners are charged with ensuring compliance with state election laws and operating within Metro's purchasing and budgetary laws.

Farmer's Market Board

Through a collaboration of government and local owner-operators, the Farmer's Market provides a diverse collection of the freshest, highest-quality foods available; service to customers that is second to none, and products that provide a good value for the dollar in an atmosphere that provides a unique shopping experience with an emphasis on Tennessee.

Historical Commission

The Metropolitan Historical Commission (MHC) is a municipal historic preservation agency working to document history, save and reuse buildings, and make the public more aware of the necessity and advantages of preservation in Nashville and Davidson County, Tennessee. MHC seeks to preserve, protect, and document the history, historic places, buildings, cultural resources, and neighborhoods in our service area through education, technical assistance, community outreach & engagement, and advocacy.

Human Relations

The mission of the Human Relations Commission is to protect and promote the personal dignity of all people by protecting and promoting their safety, health, security, peace, and general welfare. Nine Human Relations Commissioners are nominated by the Mayor and six are nominated by Councilmembers to represent the conscience of the Nashville and Davidson County community. Commissioners are responsible for the oversight, resolution, and addressing of community concern issues and complaints of discrimination (real and perceived). The Executive Director manages the day-to-day operations of the Human Relations Commission. The Director is responsible for all fiscal, administrative, and program areas of the Commission.

Justice Integration Systems Policy Committee

The mission of the Justice Integration Services Department is to provide comprehensive, integrated justice information management products to Metro Justice and Public Safety agencies, Metro departments, other jurisdictions and the general public so they can benefit from shared justice information and make informed decisions and recommendations that impact the safety and well-being of their communities.

Library Board

The Library Board ensures that people throughout Davidson County have access to a wide variety of information and learning materials—printed, electronic, audiovisual, and more. Its mission includes supporting self-education, helping students with formal studies, encouraging recreational reading, promoting literacy, and meeting everyday information needs for all community members, including those with disabilities.

The Main Library and twenty branch libraries deliver comprehensive services in both neighborhood and regional settings. These services include reference assistance, children's programs, reader's advisory help, and public events. Each location offers a diverse collection of nonfiction and popular books, study resources for all ages, books on CD, and popular videos. Many branches also provide copy and fax machines, tax forms, FAFSA forms, magnet school applications and access to the Library of Things. Every library supplies access to an online catalog and public computers with Internet access, connecting users to the entire system's resources.

Metro Action Commission

The mission of the Metropolitan Action Commission (MAC) is to administer Head Start, Community Services Block Grant (CSBG), Low Income Home Energy Assistance Program (LIHEAP), USDA Summer Food and other social service programs for Metropolitan Government.

Parks and Recreation

Parks and Recreation works to provide and maintain sufficient acreage, facilities, and programming to effectively offer the most diversified recreational services possible, ensuring that all citizens, regardless of income level, have equal opportunity and choice of participation. In addition, Parks maintains and increases the usability of the region's physical structures for the enjoyment of the citizens of Davidson County and their guests.

Planning Commission

The Planning Commission acts as the official planning agency for the Metropolitan Government and assumes the responsibilities granted to municipal, regional, or metropolitan planning agencies by state law including general planning, zoning, and subdivision regulations.

The mission of the Planning Department is to promote livability and quality growth in Metropolitan Nashville-Davidson County that enhances the built environment, conserves the natural environment, and preserves cultural and historical resources. With this purpose, the Planning Department will:

- Ensure meaningful citizen participation,
- Promote responsible growth and development,
- Encourage development that accommodates a variety of lifestyles, housing, transportation alternatives, and employment opportunities,
- Promote regional cooperation in planning throughout Middle Tennessee, and
- Serve as an accessible resource for information and technical assistance for residents, neighborhoods, and the business community.

Public Health Board

The Public Health Board is responsible for protecting and promoting the health of the residents of the county and the thousands of others who work, shop, and play in the city every day. The department's employees are committed to providing high quality services.

Social Services

The Metropolitan Social Services Department's primary purpose is to respond to persons in need of assistance, opportunities and information when challenged by economic, social or behavioral problems. In delivering these services, Metropolitan Social Services will respect the dignity of people in need and support their unique ability to grow, change and succeed through personal choices.

Metropolitan Social Services staff works in conjunction with other agencies to develop professional, comprehensive and effective responses to individual and community challenges and to build understanding and support by the public. Metropolitan Social Services will provide research and analysis of social problems within the county to other branches and departments of Metropolitan Government as needed.

OTHER ELECTED OFFICIALS

Assessor of Property

The mission of the Assessor of Property is to accurately identify, list, appraise and classify all taxable properties to achieve fair and equitable values for the preparation and completion of the annual assessment roll in a timely manner, while educating property owners of the appraisal process and their options to appeal, as well as learn of available assistance programs.

Circuit Court Clerk

The Circuit Court Clerk's mission is to serve the eight Circuit Courts, the Civil Division of the General Sessions Court, the Metropolitan Traffic Courts, and the public as a record keeping office; to file and maintain all records associated with Civil Court cases; to collect, disburse and report on funds according to state statutes and court orders.

Clerk and Master

The office of the Clerk and Master is a constitutional office in the judicial branch of government and serves as the filing and support office for Chancery Court. The office administers the dockets, keeps the calendar and permanent records as directed by the four Chancellors or required by law, deposits and remits judgment funds pursuant to court order and statute, and collects delinquent property taxes. The role of the office is also judicial as the Clerk and Master hears matters as directed by the Chancellors.

County Clerk

The County Clerk serves to collect certain state privilege license fees as well as other state and local revenues, fees, commissions, and taxes as provided by law.

Criminal Court Clerk

The Criminal Court Clerk's mission is to serve the courts having criminal jurisdiction, to be responsible for all records generated from arrest through disposal of charges on state warrants or indictments, and as an elective office, to serve the legal, financial, and public communities by rendering service in an efficient manner.

District Attorney General

By authority granted in TCA § 8-7-10, the District Attorney General serves to investigate and prosecute all criminal offenses that occur within Davidson County where there is sufficient evidence to warrant conviction.

All prosecutions are designed to punish offenders, incapacitate violent and repeat criminals, and generally to deter future criminal activity. Additionally, the office is committed to treating victims and witnesses with dignity.

General Sessions Court Judges

Metropolitan General Sessions Court is committed to excellence in administering justice and is a contributing partner working toward a safe and vital community in Nashville-Davidson County.

The Court Judges of the Metropolitan General Sessions Court of Nashville-Davidson County is a high volume, limited jurisdiction Court that was first established in 1937. It has grown to an eleven division Court that handles civil cases with monetary limits not greater than $25,000. The criminal case jurisdiction covers preliminary hearings in felony cases and misdemeanor cases in which the defendant waives the right to a jury. Since it is not a "court of record," its decisions are subject to appeal. Since 1971, this Court has been authorized under the Metropolitan Charter to handle Metropolitan ordinance violations involving traffic, environmental, and other county ordinance violations. General Sessions judges are elected to an eight-year term.

In addition to the eleven judges, a part-time referee conducts the initial hearings for environmental cases and the non-traffic Metro ordinance violations, and a total of eighteen (full, part time and fill in) law trained judicial commissioners preside over Night Court 24 hours per day, 365 days per year.

The General Sessions Courts have dockets that adjudicate the following types of cases: criminal bond, traffic, civil, driver's license, jail review, orders of protection, domestic violence, environmental, emergency committals, special committals, state traffic and felony drug, probation, and Mental Health Court.

Juvenile Court

The Juvenile Court provides a judicial and non-judicial service delivery system that is fair, accessible, efficient and responsive that will meet the immediate and long-term needs of the citizens of Greater Nashville and Davidson County Tennessee in a manner consistent with public safety.

Juvenile Court Clerk

The Juvenile Court Clerk is responsible for keeping all records of the Court. The Clerk's Office maintains separate minutes, dockets and records for all matters pertaining to Juvenile Court proceedings. In addition, this office collects payments, fines and restitutions and maintains accounts in excess of $1.7 million for child victim criminal injuries. The Clerk's staff files litigation and paternity petitions, sets Court costs and dates and files all motions. The Juvenile Court Clerk is an elected official and maintains a separate budget from the Juvenile Court.

Public Defender

The Metropolitan Public Defender's Office operates under the authority of the Metropolitan Charter, Title II, Section 2-16-010, which states as follows: The public defender shall render legal aid and defend only those indigent defendants who are in jail, charged with the commission of a crime and are unable to make bond, or such other defendants as a court with criminal jurisdiction shall determine to be indigent. In addition, the public defender shall provide guardian *ad litem* services when such services are deemed required by the Davidson County juvenile court for children who are the subject of proceedings in such court and the Metropolitan Government would be required by law to pay reasonable compensation for such services if not provided by the public defender. The Public Defender's Office is staffed with 72 licensed attorneys who represent indigent clients on charges ranging from public drunkenness to first degree murder.

Register of Deeds

The Register of Deeds Office records deeds, mortgages, plats, leases, liens, limited partnership agreements, charters, and service discharges. All documents are imaged and indexed.

The mission of the Register of Deeds is to record all documents pertaining to real estate and documents relative to the Uniform Commercial Code. We also strive to maintain the integrity of all official records and to offer courteous, friendly, and expeditious service to all who use the Register's Office.

Sheriff

With a commitment to excellence, the mission of the Sheriff's Department is to strive to be the leader in the field of corrections, service to civil process, and innovative community-based programs, emphasizing accountability, diversity, integrity, and professionalism.

Since 1963, DCSO has devoted 100% of its efforts and resources to two major areas of critical concern, corrections and civil process. In the mid-1990s, the DCSO Correctional Work Center was awarded national accreditation by the American Correctional Association. The Training Academy followed in 1999, becoming the first local Sheriff's Office Training Academy in America to achieve national ACA accreditation. In January 2001, DCSO became the first County correctional administration in the United States to be accredited by the ACA. The Criminal Justice Center and the Hill Detention Center were accredited in 2002.

State Trial Courts

State Trial Courts, under Circuit, Criminal and Chancery Judges, consist of the following two divisions.

Trustee

The Trustee is responsible for collecting Davidson County's Real Property Tax, Public Utility Tax, Personal Property Tax, and Central Business Improvement District Tax, Vegetation Liens and Demolition Liens each year; and administering the Tax Relief Program for the State of Tennessee and Metro Government. The Office of the Trustee accepts the Certified Real Property and Personal Tax Roll from the Assessor of Property in September each year. The Trustee's office then mails printed tax statements by October 1. The Tennessee Regulatory Authority sends the Utility Tax Roll to the Trustee in December each year, and tax statements are printed and mailed in January. This office also collects and processes the Central Business Improvement District tax receivables.

PROGRAM COVERAGE

Title VI applies to both Metro functions, facilities, operations programs and projects that receive federal funding as well as to services provided by sub-recipients that receive federal financial assistance through contracts from Metro. It is the city's goal that all services be administered in a nondiscriminatory manner.

Federal Funding in Metro

Currently, there are several Metro Departments which benefit from outside funding as a viable programming resource. A variety of mechanisms exist to manage grants in Metro. The Division of Grants Coordination was established to better enable Metro to manage its current grants and to seek additional outside funding.

The Division of Grants Coordination assists Metro departments with identifying funding opportunities, fostering collaborations and developing sound grant proposals; serving as a "gatekeeper" and monitor of grants as they move through the Metro approval process; developing and implementing policies and procedures for grants to Metro; providing technical assistance and grants-related training to departments, maintaining a database of Metro's grants, acting as a liaison between user departments and the Finance Department on grants-related matters and managing Title VI activities.

In that Metro, through the Division of Grants Coordination, is able to comprehensively identify and track all of its federal grants, information regarding those grants is readily available. A list of current Metro grants from Federal sources (including pass thru grants) is found in Appendix D.

RESOURCES COMMITTED TO TITLE VI COMPLIANCE

Metro has committed significant resources to program areas with a direct impact on Title VI implementation planning and compliance review efforts. The Metro Title VI coordination function has been assigned to staff in the Human Relations Commission; however, each department has an assigned Title VI coordinator with departmental responsibility lying ultimately with the Department Head and overall responsibility for the Metro's compliance lying with the Mayor.

Each department is responsible for implementation, compliance and data collection in their respective areas.

Additionally, the Office of Financial Accountability (OFA) in the Office of Management and Budget is responsible for the monitoring of Metro's state and federal grants contracts. This Office also monitors Metro's direct appropriation grant contracts to non-profits organizations. As a part of the grant monitoring reviews, civil rights program issues are reviewed for compliance.

TITLE VI PROCEDURES

The responsibility for coordinating Title VI compliance within the Metropolitan Government of Nashville and Davidson County is assigned to and divided among respective departments. Each department head has appointed a Title VI Departmental Coordinator (See Appendix A). The Departmental Coordinator works closely with the Metro Title VI Coordinator and is responsible for administering the compliance procedures and Title VI complaint processing for the respective departments.

Communication

Metro will take appropriate steps to communicate its Title VI policy and program to all Metro employees, sub-recipients and the general public. Sub-recipient notification of Title VI is imperative, and all will be made aware of the importance of Title VI compliance. It is equally important that protected beneficiaries are encouraged to participate in departmental programs and are informed of Metro policies, especially regarding filing complaints.

These procedures are part of an administrative process, which does not provide for remedies that include punitive damages or compensatory remuneration for the complaint.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Agricultural Extension Year: 2026

Title VI Coordinator: Katrice W Jones Morgan (UT) Form Completed By: Andrew Lantz

Form Completion Date: 5/26/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

UTK System asynchronous on-demand module

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

UTK training, plus Office of Equal Opportunity & Accessibility https://dae.utk.edu/eoa/title-vi-plans/

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Non-discrimination Statement appears on all UTK and UT System websites and digital and printed publications.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. https://oir.utk.edu/make-a-report/

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Specific to program

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. Contact UTK Equal Opportunity and Accessibility, who will accommodate requests using on-campus resources, the Tennessee Language Center, and Avaza.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☑ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
John Compton	White
Brad Box	White
Bill Haslam	White
Andy Holt	White
Decosta Jenkins	Black or African American
Ashlee Mallon	White
Shanea McKinney	Black or African American

Chris Patterson	White
William C. Rhodes III	White
Donnie Smith	White
David Watson	White
Lang Wiseman	White
Jamie Woodson	White
David Watson	White

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

https://tennessee.edu/about/leadership/board-of-trustees/members/ TN Commissioner of Agriculture; Appointed by the Governor, Speaker of the House, Speaker of the Senate, and the Board.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Arts Commission Year: 2026

Title VI Coordinator: Capri Harston Form Completed By: Capri Harston

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Training Videos

☐ Not Provided

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Training and Language Access Plan information is distributed to Metro Arts staff through email and at staff meetings.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

The Title VI poster is on the Metro Arts website, inside our office, and within our Grant guidelines and contracts.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☑ Other: We direct individuals to make complaints directly to MHRC in our funding guidelines.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

While we do not have any committees specifically supported by FFA, we solicit participation in other opportunities through stakeholders, community partners and community members, Council and Commission members. Community members may nominate themselves or others for community panels and other opportunities here: https://www.metroartsnashville.gov/opportunities.

METRO NASHVILLE ARTS COMMISSION

LANGUAGE ACCESS PLAN

February 2024

A. POLICY STATEMENT

As part of our 5-year plan for Nashville, 'Crafting a CREATIVE City,' we have identified specific challenges and opportunities regarding equity and participation among immigrant and refugee populations. One such challenge involves meeting the increased demand for diverse cultural programming to align with demographic shifts in our population. To address this, we're committed to supporting artists from underrepresented communities and fostering engagement across all neighborhoods, including those with a significant immigrant and refugee presence. In this regard, the Metro Arts Commission is dedicated to ensuring that all residents have equitable access to our programs and services, regardless of their language proficiency.

In line with this commitment, we recognize the importance of establishing a robust language access plan to facilitate effective communication with those with Limited English Proficiency (LEP). Our policy reflects our belief that it's our responsibility to provide language assistance, such as translation services and interpreter support, to facilitate communication between the Metro Arts Commission and LEP individuals in our community. Therefore, we're committed to taking reasonable steps to offer language assistance services to our LEP clients and to inform the public about the availability of these services.

B. DEFINITIONS[1]

a) *Language Assistance Services* – Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Metro Arts Commission.

b) *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 communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

c) *Meaningful Access* – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to

[1] Adapted from the Department of Justice's Language Access plan, available at: www.justice.gov/open/language-access-plan.pdf.

programs or activities provided to English proficient individuals.

d) *Multilingual staff or employee* – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language as authorized by his or her component.

e) *Programs or Services* – The phrase “programs or services” and the term “offering(s)” mean all the operations of the Metro Arts Commission.

f) *Qualified Translator or Interpreter* – An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or is authorized to do so by contract with the Department or by approval of his or her component.

g) *Sight Translation* – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

h) *Translation* – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

i) *Vital Document* – Paper or electronic written material that contains information that is critical for accessing a component’s program or activities or is required by law.

C. PURPOSE

Establishing a language access plan for the Metro Arts Commission serves a crucial purpose in fostering inclusivity and ensuring equitable access to its programs and services. By proactively addressing language barriers, the Commission can effectively engage with diverse communities, including those with Limited English Proficiency (LEP). A language access plan not only demonstrates the Commission's commitment to serving all residents regardless of their language background but also facilitates meaningful participation in cultural activities and initiatives. This enhances community cohesion and fosters a sense of belonging among immigrant and refugee populations, contributing to the overall vibrancy and diversity of Nashville's cultural landscape.

D. LANGUAGE NEEDS ASSESSMENT

The decision to provide language assistance services should include an assessment of the number or proportion of LEP persons from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. Generally, identifying any community where the LEP population equals 5 percent or more in a given language automatically triggers providing language assistance services as a mandatory and normal part of the program operation.

In determining *reasonable steps* to ensure meaningful access to the information and services the Metro Arts Commission provides, there are four factors to be considered:

- **Factor 1: The number or proportion of LEP individuals in the organization's service area.**

According to Census Data for the year 2022, Davidson County had a total of 663,264 inhabitants. Out of this number, 60743 (**10.08%**) spoke English "less than very well" and are therefore considered LEP (limited English proficient).

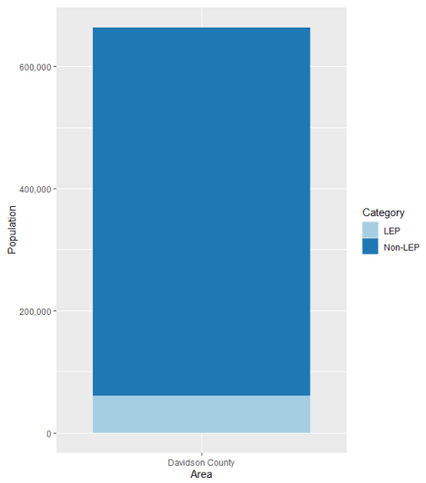


Figure 1: LEP Population in Davidson County
Source: U.S. Census Bureau. (2022). *Detailed Household Language by Household Limited English-Speaking Status. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B16002.*

Even though the Metro Nashville Arts Commission's area of service is all of Davidson County, the organization has gathered information about the frequency of engagement between the community and arts offerings for different parts of the county. In 2015, the Nashville Area Chamber of Commerce's Research Center and the Metro Arts Commission conducted research to understand Nashville's cultural landscape along those lines.

According to that document, "[l]ower levels of activity are broadly located in two clusters: the northern third of the county, where population density is lower (as suggested by large districts) and in the southeastern quadrant of the county, where population density and totals are quite high."[2] When comparing the 'Continuum of Cultural Activity' map (Figure 2) with a map showing data regarding LEP households in Davidson County (Figure 3), there is a match between areas of lower cultural activity in the North (District 10) and Southeast (Districts 32 and 33) and areas with a higher concentration of LEP households. On the flip side, areas with high cultural activity in Downtown Nashville also match areas with the highest rate of LEP households.

[2] Source: Source: Nashville Chamber of Commerce. The Research Center. (2015). *Culture Here: A Report on Cultural Assets and Activities.*

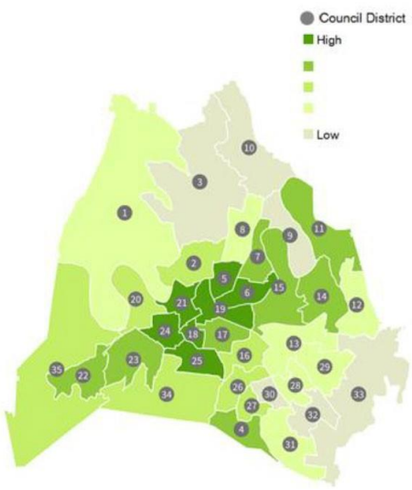


Figure 2: Continuum of Cultural Activity: Composite Layers

Source: Nashville Chamber of Commerce. The Research Center. (2015). *Culture Here: A Report on Cultural Assets and Activities.*

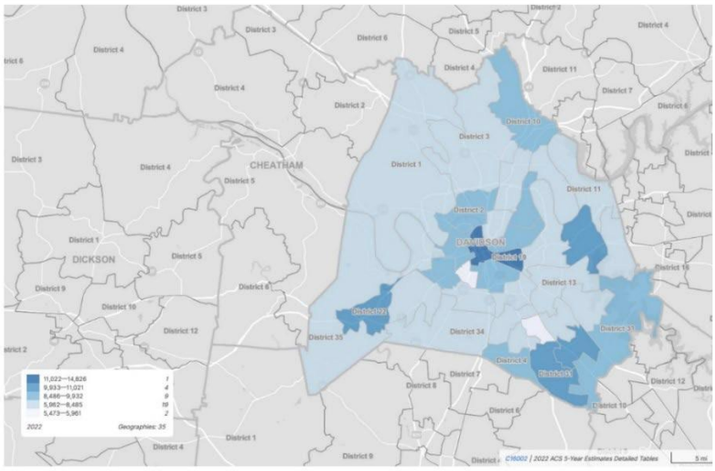


Figure 3: LEP Households by District in Davidson County

Source: U.S. Census Bureau. (2022). *Household Language by Household Limited English-Speaking Status. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16002.*

Figure 4 shows that Districts 32 and 33 have higher percentages of LEP residents than Davidson County as a whole. One of the tools – although not the only one – that could help increase the level of cultural activity in those areas would be to reach out to those relatively large LEP populations with information and resources in their own languages.

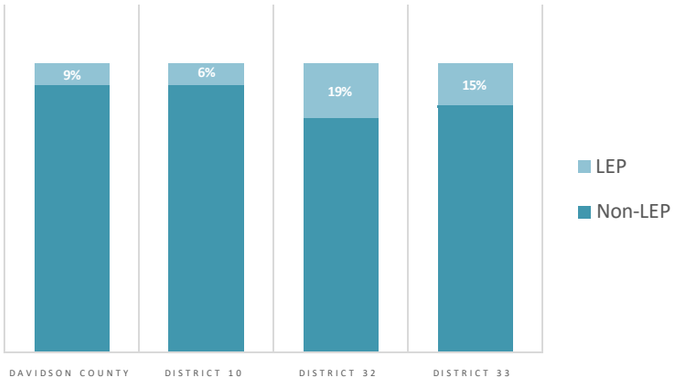


Figure 4: LEP and Non-LEP Populations in Davidson County and Select Districts

Source: U.S. Census Bureau. (2022). *Language Spoken at Home. American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601.*

Regarding the languages spoken by these LEP populations, these are the ones which are the most commonly spoken in Davidson County, according to Census Data:

Language	Nr. Of Households
Spanish	9696
Arabic	1169
Other and unspecified languages	1049
Tagalog (incl. Filipino)	717
Chinese (incl. Mandarin, Cantonese)	704
Other Indo-European languages	638
Other Asian and Pacific Island languages	594
Korean	130
Vietnamese	93

Table 1: LEP Households by Language Spoken at Home
Source: U.S. Census Bureau. (2022). *Detailed Household Language by Household Limited English-Speaking Status. American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B16002.*

Many languages are grouped within very diffuse geographical areas, but their components can be estimated comparing these datapoints with the ones provided by census table B05006: Place of Birth for the Foreign-Born Population in the United States:

Country of Origin	Population
Egypt	6813
Iraq	4769
Ethiopia	2887
India	2866
China	2864
Korea	1906
Burma	1549
Vietnam	1468
Philippines	1452
Nigeria	1407
DRC	1315
Somalia	1277
Afghanistan	1091

Table 2: Place of Birth for Foreign-Born Population in Davidson County
Source: U.S. Census Bureau. (2022). *Place of Birth for the Foreign-Born Population in the United States American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B05006.*

Using this supplementary data, a more detailed list can be generated. It should be noted that these data are only provisional, and their accuracy is not as high as if we had actual detailed language data. It is suggested that, in the future, the Metro Arts Commission collects data on contacts with LEP clients.

List of languages other than English spoken in Davidson County:

- Spanish
- Arabic
- Tagalog
- Chinese
- Other Indo-European: Hindi, Kurdish
- Other Asian and Pacific: Burmese
- Korean
- Vietnamese
- Other and unspecified: Swahili, Somali

- **Factor 2: The frequency LEP individuals come in contact with the program.**

The Metro Arts Commission has yet to engage with Limited English Proficiency (LEP) individuals, which could be attributed to the predominant provision of information and materials exclusively in English. Additionally, cultural activities, while significant, might not hold the same priority as other essential public services for immigrant and refugee populations. This underscores the critical need for translating program details and offerings provided by the Metro Arts Commission.

- **Factor 3: The nature and importance of the program, activity, or service provided to LEP individuals.**

Through grant programs, public art initiatives, and community partnerships, the Nashville Metro Arts Commission fosters creativity, enriches neighborhoods, and enhances the quality of life for all residents by ensuring access to diverse cultural experiences and opportunities for artistic expression.

Art plays a crucial role in enhancing the vibrancy and vitality of a city, serving as a catalyst for social, economic, and cultural development. Beyond its aesthetic appeal, art fosters a sense of identity and belonging among residents, reflecting the diverse narratives and experiences that shape a community. By providing platforms for creative expression and cultural exchange, cities can cultivate innovation, dialogue, and empathy, enriching the lives of individuals and fostering a more inclusive and interconnected society.

This is particularly important during a period marked by the rise of voices that resent the existence and participation of immigrant and refugee communities in our city. Hence, the Metro Arts Commission is dedicated to equipping members of these communities with the means to express themselves and actively engage in Davidson County's cultural landscape.

- **Factor 4: Determine the resources available to assist LEP individuals.**

Through a collaboration between the Tennessee Language Center and the Metro Human Relations Commission, the Metro Arts Commission can get telephonic interpretation and document translation services free of charge. In the past, the only resource available for the Commission was one bilingual staff member. A list of other Language Service Providers can be found in this document (Section F), should the Metro Arts Commission want to use another provider.

E. LANGUAGE ASSISTANCE MEASURES

- **Interpretation**

1. *Determine if language assistance is needed:*

   Language assistance services will be provided to any individual that requests it, or if a staff member is unable to communicate in English with an individual. Staff members will notify all individuals that they have a right to an interpreter at no cost.

2. *Identify the LEP's primary language:*

   If a staff member cannot determine the primary language spoken by an individual, they can use the language identification flashcards (Appendix I) or call the telephonic interpretation service and ask them to determine the language.

3. *Contact a telephonic interpreter:*

   1. If the LEP individual is present with you, you can use the speaker function of your phone so the interpreter can hear both of you. If the LEP individual is reaching out to you over the phone, place the caller on hold.
   2. Dial the number corresponding to your preferred telephonic interpretation provider.
   3. If required by your telephonic interpretation provider, enter your client ID and/or PIN number.
   4. Brief the interpreter on the nature and goals of the call.
   5. If the LEP is on hold, add them to the call.

   Note: *When working with a telephonic interpreter, several good practices can ensure effective communication and a positive experience for all parties involved:*

1. *Pause for Interpretation*: Speak in short segments, pausing frequently to allow the interpreter time to convey the message accurately. Avoid speaking over the interpreter or interrupting their interpretation.
2. *Speak Clearly and Directly*: Speak directly to the client or individual, enunciating clearly and at a moderate pace to aid the interpreter in accurately conveying your message.
3. *Avoid Jargon and Complex Language*: Use simple and straightforward language, avoiding slang, technical jargon, or complex terminology that may be difficult for the interpreter to translate.

- **Translation**

To have a document translated by a language service provider, follow these steps:

1. *Select a Language Service Provider (LSP):*

   A list of available providers is included in this document. Consider factors such as the provider's experience, expertise, customer reviews, and pricing structure.

2. *Request a Quote:*

   Once you've selected an LSP, provide them with the document(s) to be translated. Ensure that the document is in an editable format, and clearly communicate any specific instructions or preferences to the LSP.

3. *Review the Terms and Timeline:*

   Review the LSP's terms and conditions, including pricing, payment terms, confidentiality agreements, and turnaround time. Clarify any questions or concerns before proceeding with the translation project.

4. *Collaborate with the LSP:*

   Address any questions or issues that arise during the translation process with the LSP. Provide context, reference materials, and feedback as needed to ensure accuracy and quality.

5. *Delivery:*

   Arrange for delivery in the desired format. Confirm receipt and ensure that the translated document meets your expectations.

F. Language Services Providers:

- *AVAZA Language Services Corp.*
  Website: http://avaza.co/pages/
  Email: info@avaza.co

- *Language Line Solutions*
  Website: https://www.languageline.com/contact-language-line-solutions
  Email: CustomerCare@LanguageLine.com

- *Linguistica International*
  Website: https://www.linguisticainternational.com/translations/
  Email: contact@www.linguisticainternational.com

- *LTC Language Solutions*
  Website: https://ltclanguagesolutions.com/about/locations/nashville/
  Email: sales@ltcls.com

- *Tennessee Language Center*
  Website: https://tlc.tennessee.edu/
  Email: info.tlc@tennessee.edu

- *TransPerfect*
  Website: https://www.transperfect.com/contact
  Email: atlanta@transperfect.com

- *United Language Group*
  Website: https://www.unitedlanguagegroup.com/contact
  Email: Customer.Care@ulgroup.com

Note: *You can use the following average prices as a reference. Actual prices may vary:*

  - *Telephonic Interpretation:* $0.75 per minute
  - *In-Person Interpretation:* $76 per hour, 2-hr minimum
  - *Video Remote Interpreting (VRI):* $1.27 per minute
  - *Translation:* $0.15 per word (Spanish), $0.28 per word (other languages)

G. Contacts and Complaint Procedures

The Nashville Metro Arts Commission is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in any of our programs or activities on the basis of race, color, national origin (including language), or other protected characteristics under Title VI of the Civil Rights Act of 1964.

Any person who thinks there has been discriminatory action against him/her because of LEP should contact Chuck Beard, at Chuck.Beard@nashville.gov.

H. Notice of Language Assistance Services

The Metro Arts Commission offers language assistance services free of charge.

If you speak a language other than English, we provide language interpreters to assist you during interactions with our staff. Additionally, essential information and documents can be translated into your preferred language upon request.

Your access to our programs and services is important to us, and we are dedicated to breaking down language barriers to ensure that everyone can fully participate in Nashville's vibrant cultural scene.

For language assistance services, please contact us at 615-862-6720 or arts@nashville.gov. We are here to help.

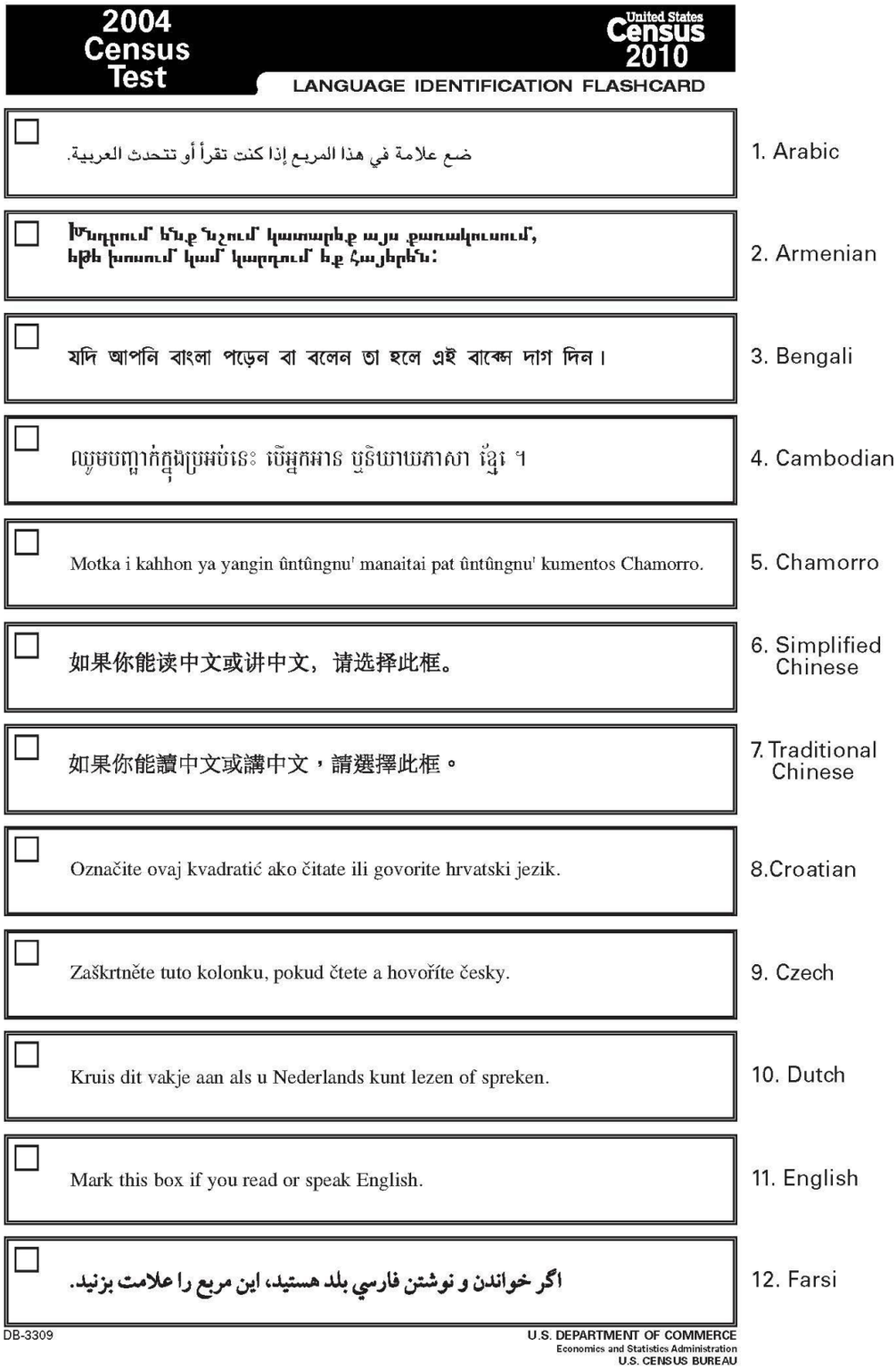
La Comisión de Arte Metropolitana (Metro Arts Commission) ofrece asistencia lingüística de forma gratuita.

Si usted habla un idioma que no sea el inglés, nosotros le proveeremos intérpretes para que le ayuden a comunicarse con nuestro personal. Adicionalmente, podemos traducir información y documentos esenciales a su idioma si usted lo solicita.

Es importante para nosotros que usted pueda acceder a nuestros programas y servicios, y estamos dedicados a romper las barreras lingüísticas para asegurarnos de que todas las personas puedan participar en la escena cultural de Nashville.

Para solicitar servicios de asistencia lingüística, por favor llámenos al 615-862-6720 o envíenos un correo electrónico a arts@nashville.gov. Estamos aquí para ayudarle.

A. Appendix I: Language Identification Cards



☐ Cocher ici si vous lisez ou parlez le français.	13. French
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
☐ Marchi questa casella se legge o parla italiano.	21. Italian
☐ 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
☐ ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

DB-3309

U.S. DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. CENSUS BUREAU

☐ Assinale este quadrado se você lê ou fala português.	26. Portuguese
☐ **Însemnaţi această căsuţă dacă citiţi sau vorbiţi româneşte.**	27. Romanian
☐ Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
☐ **Обележите овај квадратић уколико читате или говорите српски језик.**	29. Serbian
☐ Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
☐ Marque esta casilla si lee o habla español.	31. Spanish
☐ Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
☐ **ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.**	33. Thai
☐ Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
☐ Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
☐ اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
☐ Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
☐ **באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.**	38. Yiddish

DB-3309

U.S. DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. CENSUS BUREAU

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Assessor of Property Year: 2026

Title VI Coordinator: Cristi Scott Form Completed By: Cristi Scott

Form Completion Date: 7/21/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

It is discussed in the new employee orientation and in one of the quarterly staff meetings.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We distribute through email and posting within the office areas.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☐ No We have not had any complaints

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? none

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. We use the Language Line Services contracted by Metro Government

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

LANGUAGE LINE SERVICES

Quick Reference Guide

When receiving a call...

1. **Use Conference Hold to place the non-English speaker on hold.**

2. **Dial 1-(866)-874-3972.**

3. **Enter on your telephone key pad, or provide the representative with:**
   6-digit Client ID: 5 1 8 1 3 4
   Company Name: Davidson County Assessor's Office
   You may press 0 or stay on the line for assistance.

4. **Press 1 for Spanish.**
   Press 2 for all other languages.
   Speak the name of the language at the prompt. An interpreter will be connected to the call

5. **Brief the Interpreter**
   Summarize what you wish to accomplish and give any special instructions.

6. **Add the non-English speaker to the line.**

When placing a call...

If you need assistance when placing a call to a non-English speaker, you may press 0 to transfer to a representative at the beginning of the call.

1. **Dial 1-(866)-874-3972.**

2. **Enter on your telephone key pad, or provide the representative with:**
   6-digit Client ID: 5 1 8 1 3 4
   Company Name: Davidson County Assessor's Office
   You may press 0 or stay on the line for assistance.

3. **Press 1 for Spanish.**
   Press 2 for all other languages.
   Speak the name of the language at the prompt. An interpreter will be connected to the call

4. **Brief the Interpreter**
   Summarize what you wish to accomplish and give any special instructions.

5. **Add the non-English speaker to the line.**

WORKPLACE CONDUCT POLICY

The Office of the Assessor of Property adopts the following language as written in the Metropolitan Government Civil Service Policy 3.1-III, regarding workplace conduct.

Employees of the Metropolitan Government should not be exposed or subjected to abusive behavior from other employees. Employees found to be engaging in such conduct shall be subject to corrective and/or disciplinary action. Supervisors may also be subject to corrective action or discipline if they learn of abusive conduct in their workplace and fail to take appropriate action.

a. Definitions and Guidelines: Abusive conduct is behavior that creates an intimidating environment likely to interfere with an individual's work. This conduct can be verbal, visual, physical, or communicated in writing or electronically. Such conduct is typically directed against a particular individual or individuals. It includes, but is not limited to, situations in which one person has authority over another and engages in conduct that unfairly exploits the power inherent in a supervisor's position. A "supervisor" is the person in an employee's chain of command having the departmental authority to direct the employee's work, to approve or deny leave requests, to conduct the employee's performance evaluations, and to counsel, correct, discipline and recommend termination of employment.

Examples of conduct that may be considered abusive include but are not limited to:

- Repeated threatening or intimidating behavior or words (written or oral).
- Repeated use of obscenities, profanity, epithets, gestures or cartoons directed at a person or group.
- Repeated degrading of a person or a group on the basis of personal characteristic(s).
- Repeated taunting, jeering, mocking, or humiliating another person through acts or words.
- Repeated screaming and/or yelling at or around others.
- Insulting someone, especially in the presence of others.
- Endangering the safety of an individual or individuals.
- Sabotaging or undermining an employee's work performance.

In considering a complaint under this policy, it shall be understood that abusive conduct must be distinguished from behavior that is appropriate to the carrying out of certain supervisory or instructional responsibilities.

Examples of conduct that demonstrate the non-abusive exercise of managerial prerogative and which should not be considered as abusive include but are not limited to:

- Routine coaching and counseling, including feedback about and correction of work performance.
- Reasonable work assignments including shift, post, and overtime assignments.
- Disciplinary procedures in accordance with adopted rules of the Civil Service Commission.
- Individual differences in styles of personal expression.
- Passionate, loud expression with no intent to harm others.
- Differences of opinion on work-related concerns.

b. Reporting Procedures Any employee who feels he or she has been subjected to abusive conduct, or any employee who believes abusive conduct has been perpetrated by one or more employees toward one or more coworkers, ***should report the matter to a supervisor including his or her supervisor, to their department's Human Resources personnel, to Metro Human Resources, or to their department or agency's appointing authority, including an elected agency head.*** Employees should not feel obligated to report their complaints to their immediate supervisor first before bringing the matter to the attention of one of the representatives identified above. While it is encouraged, an employee need not make their initial complaint in writing. However, the complainant will be required to sign an "Employee Complaint Form," and must be prepared to present sufficient detail concerning the alleged abusive conduct, including dates, times, locations, the identity of any witnesses, and what the complainant expects the witnesses to know concerning his/her complaint. Unless a threat of personal or professional harm has caused an employee to delay reporting abusive conduct, a report of abusive conduct should be made within sixty (60) calendar days of the date of the conduct giving rise to the report. If the alleged conduct is part of a continuing problem going back more than sixty (60) calendar days, the complaint should be filed within a reasonable time frame of the most recent occurrence and the complainant will need to state when the abusive conduct began and the progression to the time of the complaint.

c. Response to Complaint The recipient of an abusive conduct complaint should timely notify both the appointing authority and human resources personnel of the complainant's department. The appointing authority may appoint his/her own department personnel to investigate or may request the assistance of investigators from the Human Resources Department. If an investigation is deemed necessary, it will be conducted as soon as practicable. All affected parties will be informed of the investigation's outcome. If a complainant or group is dissatisfied with the report's finding on the ultimate question of whether the conduct complained of violated this policy, they may appeal to the Appointing Authority of their department or agency by making a written request for review within ten (10) calendar days of the date the investigative report was issued. The decision of the Appointing Authority shall be final. Lodging a complaint of abuse is not proof of prohibited conduct. A

complaint against an individual shall not be taken into account during a performance evaluation or consideration for targeting into a new position or promotion, unless a final determination has been made that the individual violated this policy.

d. Retaliation Retaliation means conduct that adversely affects another's terms or conditions of employment and has the effect of harming a person for filing a complaint or for participating in an investigation. Retaliation can take many forms.

Examples include but are not limited to:

- A threat of transfer or reassignment of work duties.
- A threat of the loss of one's job, salary level, or tangible benefits related to one's job.

It is a violation of this policy to retaliate against persons who report or make a charge of abusive conduct or to retaliate against those who testify, assist, or participate in any investigation involving a complaint. Any such retaliation, or any encouragement of another to retaliate, is a violation of this policy, independent of whether the underlying claim was substantiated.

NOTE – A department or agency's decision to temporarily transfer or re-assign a complainant's work duties, as a protective measure, pending the outcome of an investigation, will ordinarily not be considered retaliation.

e. False or Frivolous Allegations Accusations of abusive conduct typically have injurious and far-reaching effects on the careers and lives of accused individuals. Therefore, allegations must be made in good faith and not out of malice. Knowingly making a false or frivolous allegation will not be tolerated and will subject the person making such a report to disciplinary action.

f. Corrective and/or Disciplinary Action Any employee who engages in conduct that violates this policy or who encourages such conduct by others may be subject to corrective and/or disciplinary action. Supervisory personnel who allow abusive conduct to continue unabated or who fail to take appropriate action upon learning of such conduct may also be subject to corrective and/or disciplinary action.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: **Beer Board** Year: **2026**

Title VI Coordinator: **Terrence Darby Sr** Form Completed By: **Terrence Darby Sr**

Form Completion Date**: 6/5/2026**

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Webex Presentation

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Training slide deck and additional materials are stored on our office SharePoint file. File is accessible to all team members.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Notices are posted in our office and can be found on the Nashville.Gov primary website.

Do you provide this in languages other than English?

☑ Yes ☐ No **If, necessary.**

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No **Explanation provided below.**

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No **If complaints are received, they would be referred to the Metro Human Relations Commission to preserve the integrity of the department and persons involved.**

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other **Complainants are referred to the Metro Human Relations Commission**

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No **Language Access Lines would be utilized, when necessary.**

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? **N/A**

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No **I'm not aware of any federal financial assistance our department receives directly.**

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

N/A

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. **Training and materials are provided by a contracted Metro Vendor. Training material can be accessed through our office SharePoint by all team members.**

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

N/A

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No **I am not aware of any.**

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
N/A	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Client Implementation Guide

Implement Your LanguageLine®Phone℠ Interpreting Services



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Section 1: Getting Started

PURPOSE: The purpose of this section is to assign who will lead the project and identify the key contacts from the interpreter services, IT/Telecom, Area/Regional Site Managers, and training departments who will assist in the LanguageLine® Phone℠ Implementation and Optimization. And, to acquaint them with the service, its corresponding implementation, and ongoing support needs.

Step 1. Assign the Champion and Host a Needs Assessment Meeting

Assign a Champion within your organization to conduct the Interpreting Services Implementation and Optimization Project. The Champion should:

- Be detailed oriented.
- Have a good working knowledge of how your clients flow through your organization.
- Have access to work with IT and telecom personnel.
- Have existing relationships at multiple management levels throughout the organization.
- Know in detail how the organization operates.
- Be personable.

NOTE: Throughout this guide we will be referring to LanguageLine's Phone interpreting service as phone interpreting. We will be referring to the Limited English Proficient as LEP.

END OF SECTION 1: The organization now has a Champion/Project Leader for the Interpretation Services Implementation and Optimization Project and has hosted the initial meeting for all necessary teams to support the project's success.

Section 2: Champion Preparation

PURPOSE: The purpose of this section is to help the Champion conduct a successful and efficient implementation and optimization so the organization realizes the benefits of their investment in interpretation services.

Step 1. Organizational Objectives

It is important that the Champion understands their organization's objectives for investing in interpretation services in order to optimize their effectiveness. Listed below are common organizational objectives:

- Attract, retain and serve LEP and Deaf and Hard-of-Hearing clients.
- Improve the organizational competitive position in the marketplace.
- Increase productivity and efficiency of staff.
- Improve LEP and Deaf and Hard-of-Hearing customer service.
- Improve speed and ability to access qualified, trained interpreters.
- Comply with federal laws and regulations regarding LEP and Deaf and Hard-of-Hearing populations.
- Reduce the risk of lawsuits and fines.
- IT'S THE RIGHT THING TO DO for your customers, clients, or patients.

Step 2. Administrative Information

To assist during the process the Champion should always have handy:

- The organization's LanguageLine Client ID number(s).
- The contact information for LanguageLine Solutions' Customer Service department and the Account Executive.

Step 3. Telecomm/IT Infrastructure

The Champion must meet with the persons responsible for telecommunications and IT to ensure equipment for accessing interpreters is compatible with the organization's telecom infrastructure and configured for optimum efficiency.

What you need to know to successfully install Phone Interpreting:

- If the telecom infrastructure is digital, analog or a combination of both. This information will help determine the equipment and accessories you may need to purchase. For example, an analog phone will not work with a digital jack, and vice versa, without purchasing a converter.
- If your company requires dialing a digit (i.e. 8, 9) to get an outside line. This information will be used when ordering.
- LanguageLine equipment to preprogram the phones with the LanguageLine toll free number.
- Any processes/procedures for installation of phones or equipment.

Step 4. Call Flows

The Champion must know the established phone call flows for reaching a LanguageLine Solutions' interpreter. The call flow information will include the LanguageLine toll free number, Client ID, and steps for reaching an interpreter. The call flow information will be used to program equipment and will be presented to the end users during training. There are three sources for this information:

- The colleague who set up the account.
- Your LanguageLine Solutions' Account Executive.
- The LanguageLine Solutions' Customer Service Department.

Accessing LanguageLine Solutions Phone Interpreting

There are 3 basic steps to access an over-the-phone interpreter, and a 4th step, which is optional, provides you the ability to collect additional information for reporting or billing purposes.

	Step 1 - Dial: Toll-Free Number	Step 2 - Provide: Client ID#	Step 3 - Select: Language	Step 4 - Provide: Personal Code(s)
Description	The # dialed by the organization to access a phone interpreter.	6 Digit #, which identifies your organization and is associated with billing.	Selection of language needed: 200+ languages available. Ask for assistance if you can determine the language.	Additional data that can be collected from the caller if desired or needed.
Options	Option 1: Generic toll-free# (no cost associated) Option 2: Custom toll-free# (cost associated)	Organizations with a custom toll free #, the caller does not have to provide the Client ID#	Option 1: Standard Menu (Spanish & Other Languages) Option 2: Custom Menu (Up to 5 languages & Other Languages, cost associated)	Up to 4 codes can be collected; can be numeric or alphanumeric (17 characters max)
Recommendations	Request the custom toll-free number if you do not want the callers from your organization to have to provide a Client ID#	Use 1 Client ID# for the organization and billing contact.* If you need to know which area, agent, location is using the services for reporting or charging back purposes, this can be accomplished by setting up personal codes (see description under "Step 4") *Request multiple Client ID# if bills need to be sent to different contacts	Custom Language Menu, recommended for call centers or organizations that have a high demand for a select number of languages	If you need to track utilization by a specific location or person, then personal codes should be set up. They can be any number or code you choose or that you create, i.e. a cost center, department or employee #.

Call Routing Options:

1. **Automated system**: an interactive voice menu answers the call and instructs the caller to enter the necessary data via the keypad of the telephone. This routing option is recommended to allow for the quickest connect times to an interpreter.
2. **Agent assisted:** a LanguageLine Solutions agent answers and collects some or all of the required data from caller and connects caller to the interpreter. This option lengthens the connect time to the interpreter.

Determine How End-User Will Access It

- Do you want end-users to dial the toll free number assigned to the account?
  - This number will appear on the support materials and on any equipment programmed by LanguageLine.
- Do you want end-users to dial an internal extension? Ask telecom to create an internal extension and route it to the LLS toll free number assigned to the account.
  - This extension appears on support materials and equipment programmed by LanguageLine.

Recommendation: If the dial out is restricted to internal extensions, consider creating an additional internal extension to connect directly to LanguageLine Solutions.

- Do you already have an internal extension for language services and want your end-users to have access to LanguageLine?
  - Ask telecom to add LanguageLine to the phone tree and route the selection to the toll free number assigned to the account.
- Healthcare Specific – do you want end-users to use your Vocera system?
  - Ask telecom to add LanguageLine to the directory.

 Face-to-Face with a limited English proficient individual: http://www.youtube.com/watch?v=jUHK_7tyL3U&list=PLq_cfv9tFlQBRnlv0XBf7W9RrXCOje1-R

 Calling a limited English proficient individual http://www.youtube.com/watch?v=Sfx0j0GYW9A

 Receiving a call from a limited English proficient individual http://www.youtube.com/watch?v=zd_EP-SZU0c

Step 5. Equipment and Accessories

It is important for the Champion to understand what additional equipment and accessories are available and when and where each should be used. This will help best determine if new equipment and accessories need to be ordered and why. Engage your Telecom department so they can help you review the equipment and ensure compatibility.

LanguageLine Solutions over-the-phone interpreters can be accessed from any phone, however we offer additional phone equipment for when you are face-to-face with a limited English proficient individual in order to facilitate access and save you time. You have the option to order a variety of equipment to fit the needs of your organization. Some of the equipment carries a modest monthly maintenance fee and other equipment can be purchased for a low flat rate. Familiarize yourself with the available phone equipment options to determine what kind of equipment you might need at your organization.

Reference Material: 2.0 Equipment and Accessories to learn what options are available.

Video: Equipment and Accessories http://www.youtube.com/watch?v=8xZcFFoPGms

Step 6. Support Materials

There are three types of Support Materials to provide awareness that interpreters are available, identifying the preferred language, and quick reference guides for access to services.

1. Awareness Materials - a critical component for optimizing the use of LanguageLine Interpreting Services. Posters and desktop displays can be placed throughout your facility announcing that language access services for LEP individuals is available.

2. Language Identification Materials – assist your staff and LEP clients in identifying which language is needed. The LEP simply points to their preferred language.

3. Access Materials – ensure that staff has quick and easy access to the information they need to reach an interpreter. These Quick Reference Guides (QRGs) are displayed on equipment and worn, or carried by, personnel most likely to interact with LEP individuals.

Reference Material: 2.1 Support Materials to learn what options are available.

Video: Equipment and Accessories: http://www.youtube.com/watch?v=8xZcFFoPGms

Step 7: End User Training

The Champion should be familiar with:

- Training delivery options.
- Training Optimization Guide.

NOTE: These are found in the Training Optimization Guide.

Familiarizing yourself with this material will be helpful during the organizational walkthrough. During the walkthrough the Champion should take note of the type of training that will be most beneficial for meeting the organizational objectives and the parts of the training that will need to be customized.

END OF SECTION 2: The Champion is now prepared to conduct an Organizational Walkthrough and has started preparation for End User Training.

Section 3: Conduct Facility Walkthrough

PURPOSE: The purpose of an organizational walkthrough is to identify the equipment, accessories, and support materials needed for efficient use of phone interpreting services.

Step 1. Notify Other Departments

The Champion should notify each department that has interactions with LEP customers that an organizational walkthrough will be taking place. The letter will announce that a department-by-department assessment will be conducted to understand the ideal need for equipment, accessories and customer support materials required to successfully implement and optimize LanguageLine Interpretation Services.

Reference Material 3.0 **Sample Notification** can assist you in writing your communication.

Step 2. Schedule Departmental Assessment

Secure and document a date for each department's walkthrough assessment. The entire assessment should take place consecutively since the equipment and materials will be ordered and shipped together.

Step 3. Conduct and Document Scheduled Walkthrough Assessment

By working with departmental staff members the walkthrough assessment will help you understand:

- Which areas need/use access to interpreting services.
- What type of equipment they need/use.
- How much equipment they need/use.
- Where the equipment is or should be placed.
- What type of Support Materials they need/use.

The walkthrough assessment will also help determine the type of infrastructure changes that need to be made in order to accommodate access to interpreting via telephone.

NOTE: Check with departmental staff to see if any equipment or materials have been misplaced or have been stored and not in use. This will ensure you do not order unnecessary equipment or materials. Check with staff if materials need to be reordered.

Reference Materials: 3.1 **Equipment Assessment Worksheet,** and 3.2 **Support Material Assessment Worksheet** to assist you during the walkthrough.

END OF SECTION 3: The champion has completed and documented the walkthrough and has identified the equipment, accessories and support materials needs of each department/area.

3.0 Sample Notification

Your Company Logo
Date

Attention Company/Organization Employees/Staff,

In our effort to continue providing outstanding exceptional services to our limited English proficient individuals we serve, we will be conducting an organizational assessment to better understand the materials/training and/or equipment, where applicable that you might need. Our phone interpreting provider is LanguageLine Solutions who provides quick, easy access to trained over-the-phone interpreters 24/7 in more than 240 languages.

In anticipation of this walkthrough, please begin to think about the following questions:

- How your staff currently communicates with limited English proficient individuals?
- Current challenges you or your staff faces when interacting with limited English proficient individuals?
- What do you think you or your staff needs in order to facilitate the process of accessing a remote interpreter?

[For remote assessments]
Please reply to this e-mail and answer the questions below: (Add questions)

[For face-to-face]
Please let me know if there is a good date/time for me to visit your area to conduct the assessment and who is the best person that can assist.

We look forward to collaborating with you during the assessment process. Once all the information has been gathered, I will place an order for any support materials and equipment and conduct the distribution. I will also be scheduling training to assist staff in accessing LanguageLine Solutions phone interpreting.

Thank you,

Language Champion
Your Name
Your Title
Your Email
Your Phone

Section 4. Place An Order

PURPOSE: The purpose of this section is to understand how to place an order for equipment, accessories and support materials.

Step 1. Collect Ordering Information

To place an order the Champion will need:

- The departmental walkthrough documentation.
- The organization's LanguageLine Client ID number(s).
- Preferred shipping address and shipper information.

Step 2. Placing the Order

Orders can be placed easily in three different ways:

1. Go to LanguageLine Solutions web site: www.LanguageLine.com
    - Phones and Accessories: https://www.languageline.com/client-services/equipment/order-equipment
    - Support Materials: https://www.languageline.com/client-services/support-materials/order-support-materials

2. Contact LanguageLine Solutions Customer Care via email at CustomerCare@LanguageLine.com or by phone 1-800-752-6096.

3. If you have an Account Executive assigned to your account, you may contact them for assistance in placing an order.

NOTE: When ordering support materials ensure your quantities match actual needs: i.e. one badge per staff member, one QRG per phone, and one Desktop Display for each display area.

- Ordering will be delivered to your organization within two weeks.
- Depending on the size of your order be prepared to receive multiple boxes.

END OF SECTION 4: The Champion has ordered the equipment, accessories and support materials needed for a successful implementation and optimization.

Section 5: Distribution of Materials and Installation of Equipment

PURPOSE: The purpose of this section is to guide the Champion when distributing and installing equipment and materials. This section is comprised of two parts, Support Materials and Equipment and Accessories. We have included both parts in one section because they are done concurrently.

Step 1. Support Materials

Distribution

Distribute support materials to workstations and to staff who will be accessing the service, as identified in the walkthrough. Make sure support tools are accessible to employees who interact with the public.

Support Material Review

Review the materials with staff so that they understand the purpose and use of each piece when accessing an interpreter. The support materials usage will also be covered in training.

Step 2. Equipment and Accessories

Deploy Equipment

Deploy equipment according to the walkthrough assessment. You may need your telecomm/IT department's assistance in installation.

Installing and Testing Equipment

- Engage telecomm to assist you with the installation and testing.

- Dual handset phones and cordless phones:
    - Plug in the cord to the phone jack where the phone is going to be used and make sure that you get a dial tone.
    - Make a test call to LanguageLine Solutions to make sure the line is working.

- Handset and splitters:
    - Unplug the existing phone handset.
    - Plug the splitter to the jack where you took the existing handset.
    - Connect the LanguageLine Solutions handset to the splitter.
    - Make a test call to LanguageLine Solutions to make sure the interpreter can hear you through the LanguageLine Solutions handset.
    - Connect the other handset to the splitter

- Headsets: Connect to the side of the cordless phone

Step 3. Equipment Troubleshooting

If you do not hear a dial tone, use reference material 5.0 Equipment Troubleshooting - Common Issues and Solutions. If the reference material does not solve the problem, check with your telecomm personnel for guidance. If you have questions about the LanguageLine phone device or accessories, contact LanguageLine Solutions' Customer Service Department or your Account Executive.

Reference Materials 5.0 **Troubleshooting Guide - Common Issues and Solutions**

Step 4. End User Test Call Practice

Using the instructions on the QRG materials, conduct test calls with staff to access an interpreter. How to place and receive a call will also be covered in training.

END OF SECTION 5: The organization now has the equipment, accessories and materials needed to serve LEP customers.

Section 6: Ongoing Client Support and Reporting

PURPOSE: LanguageLine Solutions stands ready to provide ongoing client support for any requests that arise, and provides a range of reporting and analysis tools that enable you to better understand your usage patterns, allocate expenses and track compliance.

Step 1. Documentation

Careful documentation of the implementation process not only provides regulating bodies with proof of your efforts, but is quite useful in the maintenance and potential expansion of your program. No matter the number of phones and Client IDs, we recommend that a catalogue be maintained. This information the can be compared to monthly usage information, allowing you to better understand how and where the service is being utilized.

Step 2. LanguageLine Support

Live Customer Service

You may speak with a member of our Customer Service Department Monday through Friday, 6AM-6PM PST at 1-800-752-6096, Option 2. You may also contact them directly via email at CustomerCare@LanguageLine.com. They can assist you with any support you may require to ensure your satisfaction.

My.LanguageLine.com

My.LanguageLine.com is a password-protected online portal that provides easy access to account information 24/7/365. Available features include access to: invoices, billing and usage reports, top language usage, Voice of the Customer reporting, and ad hoc reports. You will also be able to schedule delivery of ongoing reports, at the frequency you require (daily, weekly, monthly, and annually).

Online Reporting - Voice of the Customer (VOC)

For your convenience, you may report any service experience issue, praise for an interpreter, or any comment, 24/7/365 online using our VOC system. VOC reports are logged and assigned to the appropriate department for follow-up. These reports are a key part of managing the interpreter workforce, understanding training and service issues, and identifying emerging service needs. A LanguageLine Solutions representative will contact you with the resolution to your problem, if requested. Please be prepared to provide your Client ID number, interpreter number, and as much specific information as possible, to facilitate analysis and follow-up.
The VOC is located on our website under Client Services:
https://www.languageline.com/client-services/provide-feedback

eBill

The LanguageLine Solutions eBill provides your invoice in Excel format, delivered each month to your email. The eBill provides the opportunity to analyze your usage, track costs and understand your service levels to LEP clients. You can sign up to receive the eBill on the LanguageLine Solutions' website at www.LanguageLine.com. https://www.languageline.com/client-services/manage-billing/ebill-signup

 Reference material 6.0 **MyLanguageLine** to learn how to request access and use the online account tool.

HELPFUL TIP: Take advantage of these free tools to increase productivity and to manage your expenses.

Step 3. Conduct Refreshers

LanguageLine Solutions recommends periodically reviewing the use of phone interpreting to maintain its effective use. A quarterly refresher of user training has shown to be beneficial.

Your Account Manager is available to assist with refresher trainings as needed.

END OF SECTION 6: The organization is now prepared to manage their account and contact support.

5.0 Troubleshooting Guide - Common Issues and Solutions

1 Solution Dual Handset Phones™

ISSUE: When I press the Red "Interpreter" button to dial out, it does not work.

POSSIBLE SOLUTION:
The Interpreter button may need to be re-programmed:

1. Connect the phone to an active line; lift the handset from the cradle.
2. Press STORE button once.
3. Enter the standard programming number 1-877-261-1646 or a different number/extension if applicable (include a 9 if necessary).
4. Press STORE button again.
5. Press the Red Interpreter button.
6. Place the handset on the cradle.

The Phone may be set to "P" for "Pulse." At the top part of the phone base, make sure that the setting is on "T" for "Tone."

ISSUE: When I press the White "Client ID" button when prompted, it does not work.

POSSIBLE SOLUTION:

1. The Client ID button may need to be re-programmed:
2. Follow the same instructions as above but on step 3, enter your 6-digit Client ID and on step 5 press the White Client ID button.
3. The Phone may be set to "P" for "Pulse." At the top part of the phone base, make sure that the setting is on "T" for "Tone."

ISSUE: No dial tone.

POSSIBLE SOLUTION: Check that the phone line is properly plugged into phone and that the phone is connected to an analog wall jack (the phones don't work on a digital jack).

ISSUE: The handsets don't work.

POSSIBLE SOLUTION: Check to see if the handset cords are properly plugged in to the two side-by-side jacks underneath the phone, and there are no loose connections.

ISSUE: A button or several buttons on the phone are sticking.

POSSIBLE SOLUTION: It is possible that a liquid or other substance was dropped on the phone. Try wiping down the phone with an alcohol-based cleaning wipe, paying special attention to the areas around the buttons that are sticking. Should cleaning the phone not make a difference, contact the designated language services department at your organization for a replacement phone.

ISSUE: I don't know if my phone line is analog or digital.

POSSIBLE SOLUTION: The LanguageLine Phone can be used only with analog lines, if you don't know whether the line is analog or digital contact your telecom department (but an analog jack is the common single line and the digital jack is the one to use for phones with multiple lines). If all you have is digital lines, LanguageLine can provide a digital converter, contact the designated language services department at your organization to request a converter.

ISSUE: Replacing or Requesting a new LLS Dual Handset phone.

POSSIBLE SOLUTION: Contact your language services department or LanguageLine Solutions' Customer Care Department at 1-800-752-6096 or CustomerCare@LanguageLine.com.

Cordless Dual Handset Phone

ISSUE: When I turn on the phone, there is no dial tone and on the Handset display, the following message is displayed: "Base No Power" or "No link. Re-connect base AC adapter."

POSSIBLE SOLUTION: Try re-registering the handset to the main base:

1. On the handset, press Menu, # and 130
2. On the screen a message appears that says "Press Locator on base 5 sec then Press okay"
3. Once you press and hold the "Locator" button on the main base, a message appears on the screen that says "Registering."
4. Then place the handset on the main base (where the "Locator" button is located)

If the second handset also needs to be re-registered, follow the same steps above, also using the main base with the "Locator" button on it.

NOTE: If multiple cordless phone sets are placed in an area where they are somewhat close to each other, label both bases and handsets with a unique number/letter/name because if the handsets are placed on the wrong base the end-user will get a message that says “Base no power” and will not be able to use the phone.

ISSUE: The phone rings frequently and I need to turn the ringer off.

POSSIBLE SOLUTION: To turn the ringer off:

1. Press Menu, # and enter 160
2. Move the arrow down until ringer is off and then press “Save”

ISSUE: Sometimes when I am using both handsets, I get interference and it is difficult to hear.

POSSIBLE SOLUTION: Try to maintain some distance between the two handsets to prevent interference. If the base of the phone is close to a wireless router it can also cause interference. Avoid placing near wireless speakers, video transmitters, satellite receivers or anything that emits radio frequencies. When you get within the vicinity of the frequency, the phone’s ear piece may begin to make a crackling, distorted noise.

ISSUE: When I want to use the speaker mode on the cordless handsets, I get interference and hear a loud-pitched noise.

POSSIBLE SOLUTION: Make sure when using the cordless handsets in speaker mode, that only one handset is turned on, not both. Placing both handsets in speaker mode usually results in a high pitched, distorted noise.

ISSUE: Replacing or Requesting a new LLS Cordless Dual Handset phone

POSSIBLE SOLUTION: Contact your language services department or LanguageLine Solutions’ Customer Care Department at 1-800-752-6096 or CustomerCare@LanguageLine.com.

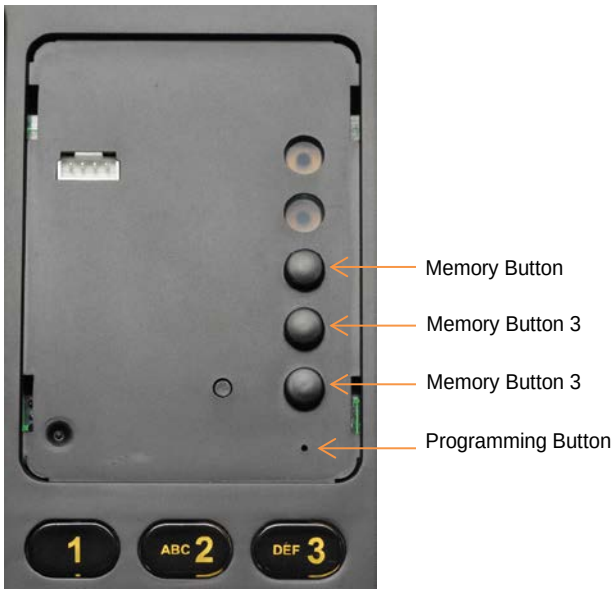
Programming/Reprogramming MedPat Phones

Remove the plastic cover and card to access the programming buttons (see photo below).

1. Pick up the left handset to get a dial tone.
2. Press the [**PROGRAM]** button using a small paperclip.
3. **Key in the** number to be programmed (call is not actually made).
4. Press the [**PROGRAM]** button again.
5. Press the desired [**MEMORY]** button where you want to store the number.
6. Hang up. .

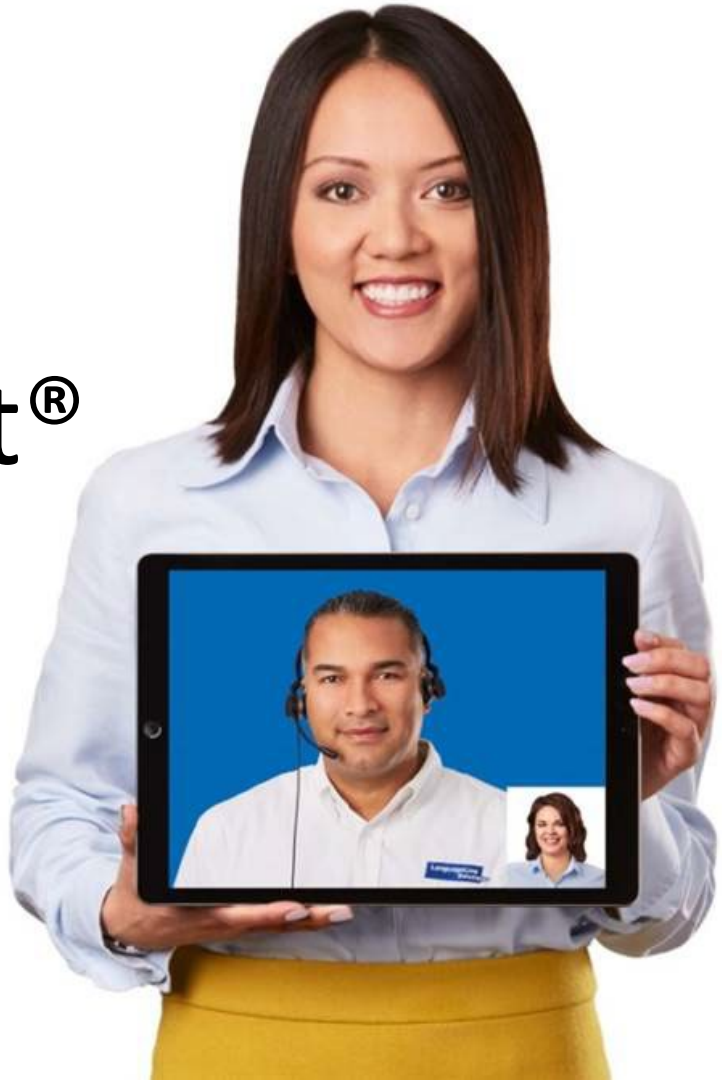
Repeat steps 1-6 for each [**MEMORY]** button you want to program.

Memory Button 1: is to program the number to access the interpreter
Memory Button 2: is to program the Client ID Number
Memory Button 3: is to program the LLS customer service number



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Optimizing LanguageLine InSight® Video Interpreting



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Agenda

- Why language access is important
- Why LanguageLine Solutions
- Managing cultural difference
- Identifying the preferred language
- How to access an interpreter
- Working with the interpreter



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Why Language Access Services?

It's the Right Thing to Do

- Improves customer service and builds loyalty by communicating in the customer's preferred language
- Improves staff efficiency by streamlining the communication process
- Mitigates risk and reduces the expense associated with a lack of effective communication



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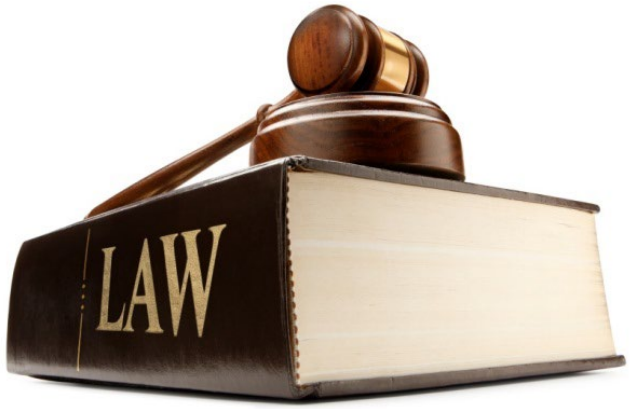
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Why Language Access Services?

It's The Law

The law requires recipients of Federal funds to provide free, professional language access services to the Limited English Proficient and the Deaf and Hard-of-Hearing and provide notification that services are available.

- Section 1557 of the Patient Protection and Affordable Care Act
- Executive Order 13166 of 2000
- Americans with Disabilities Act of 1990
- Section 504 of the Rehabilitation Act of 1973
- Title VI of the Civil Rights Act of 1964
- Local Language Access Mandates



Compliance helps us to:

- Provide an outstanding customer experience
- Avoid costly fines
- Maximize Federal funding
- Avoid the cost of litigation

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Even More Regulated in Healthcare

The law requires recipients of federal funds to provide free, professional language access services to the Limited English Proficient and the Deaf and Hard-of-Hearing and to provide notification that service is available.

- Executive Order 13166 of 2000
- The Joint Commission
- Culturally and Linguistically Appropriate Services (CLAS) Standards
- Section 1557 of the Patient Protection and Affordable Care Act
  - Bans the use of low-quality VRI
  - Requires qualified interpreters

- Benefits to patients:
  - Improves health outcomes
  - Reduces readmissions
  - Contributes to outstanding patient experience



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The Industry's Most Dependable Provider

THE PREMIER PARTNER

Quality Linguists



- Only 1 in 11 (9%) applicants hired
- Ongoing training and support
- Quality assurance and monitoring
- Average annual investment in our linguists exceeds many of our competitors annual earnings

Systems Safety and Security



- Complete hundreds of security and business continuity client audits annually in Finance, Insurance, Healthcare, Utilities, Government sectors
- True global comprehensive Insurance and Liability Policy

Financial Stability



- More than 3x revenue of our nearest competitor*
- Sustained growth with annual revenue increases

Technological Innovation



- Single largest technology investment in the history of the language industry to support client needs
- Faster, clearer connections to interpreters
- New cutting edge solutions

THE TRUSTED PARTNER

Experienced	Clients	Client Retention
		

THE PROVEN PARTNER

13 of the top 14 Medical Facilities



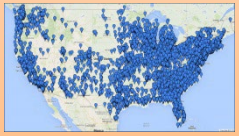
18 of the top 20 Insurance Companies



8 out of the top 10 Commercial Banks



1000s of Government Agencies



* 2018 Common Sense Advisory

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Managing Cultural Difference

Interpreters help overcome language and cultural barriers. When working with LEP persons keep in mind:

- **Cultural Sensitivity.** An LEP's culture, traditions and experiences may be very different from our own. Understand differences exist. Be non-judgmental.
- **Indirect Communication.** English is a direct language. In other languages and cultures, it often takes longer to get to the point—even during emergencies. Understand this issue and be patient.
- **Education.** LEP persons may not be familiar with practices common to us. To improve communication and reduce confusion, offer explanations when possible to bring LEP customers into the mainstream.
- **Simple Language.** To improve understanding, use simple language and ask for clarification if needed.
- **Your Manner.** Be respectful and speak in a neutral tone.

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Accessing the InSight Application

- **On the iPad/Tablet**
  - Tap on the InSight icon to open the application.
- **On the PC/Laptop**
  - Double Click on the InSight icon to open the application.



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One Time Authentication

- Enter the Authentication Code provided to you by LanguageLine.
- Name your device (identifies location, department, or person). The device name will appear on your usage report and invoice.
- Tap on Activate Device to complete authentication.
- Once completed, the application will open directly to the language selection screen.

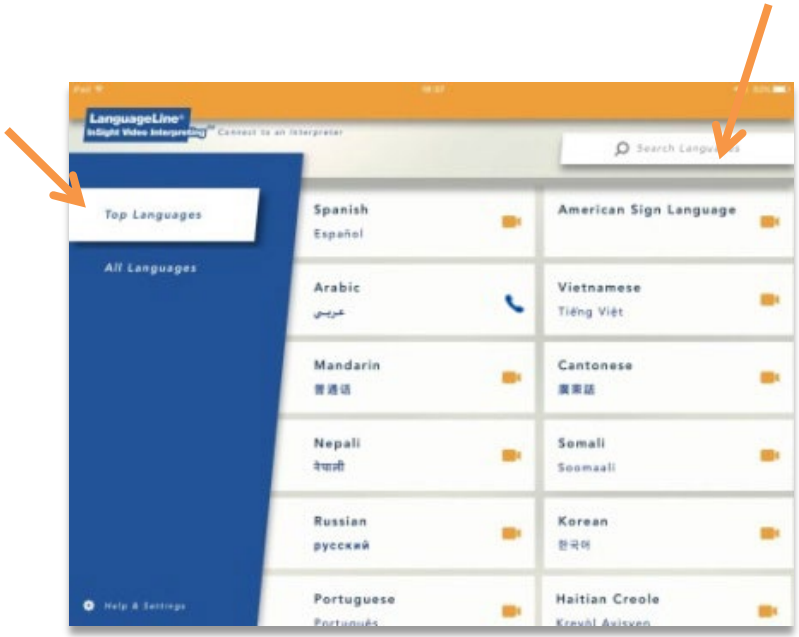


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InSight Language Selection Screen

- The app opens in “Top Languages” to access the 36 languages including American Sign Language
- Languages appear in English and in-language
- Scroll to view more languages
- Dynamic language display adjusts to your usage
- Icons dynamically adjust with language schedule to match video schedule
- Search Languages feature allows searches by language or country



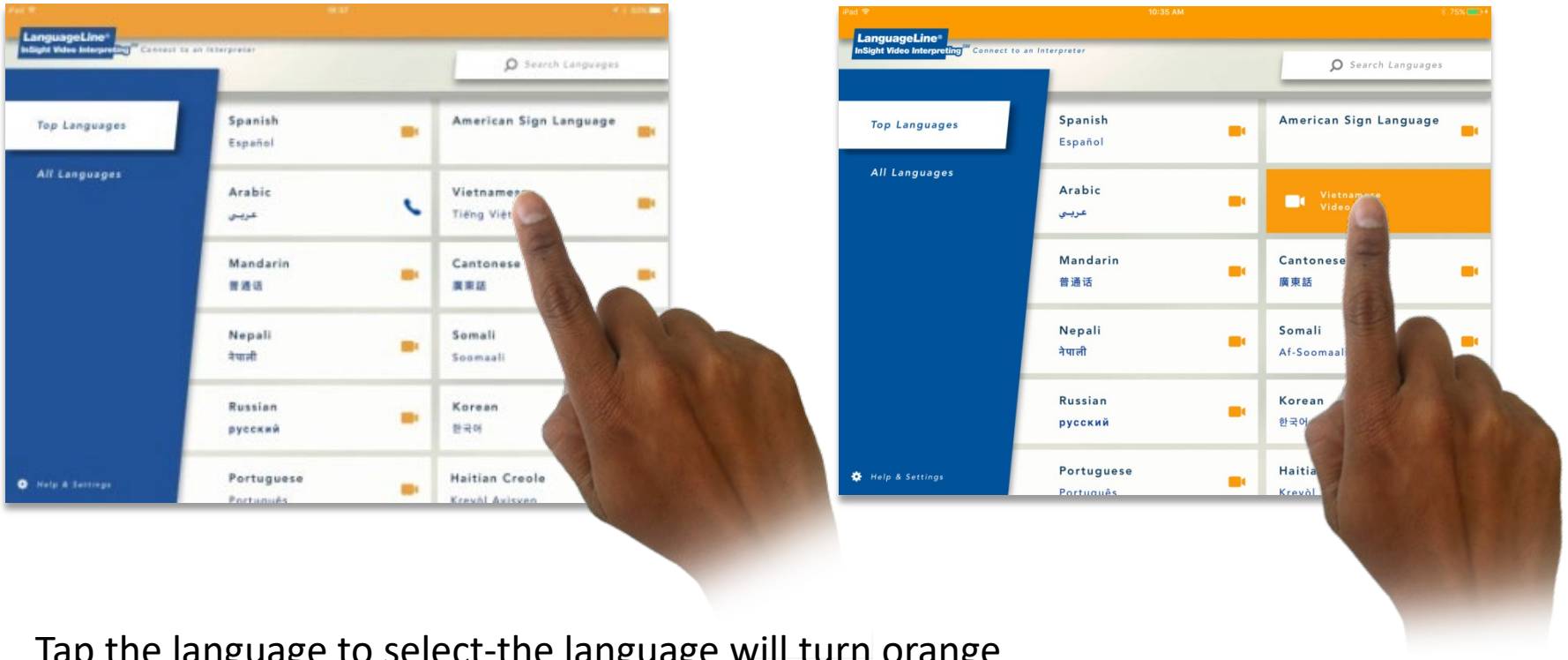
Available Video

Available Audio

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Accessing a Video Interpreter

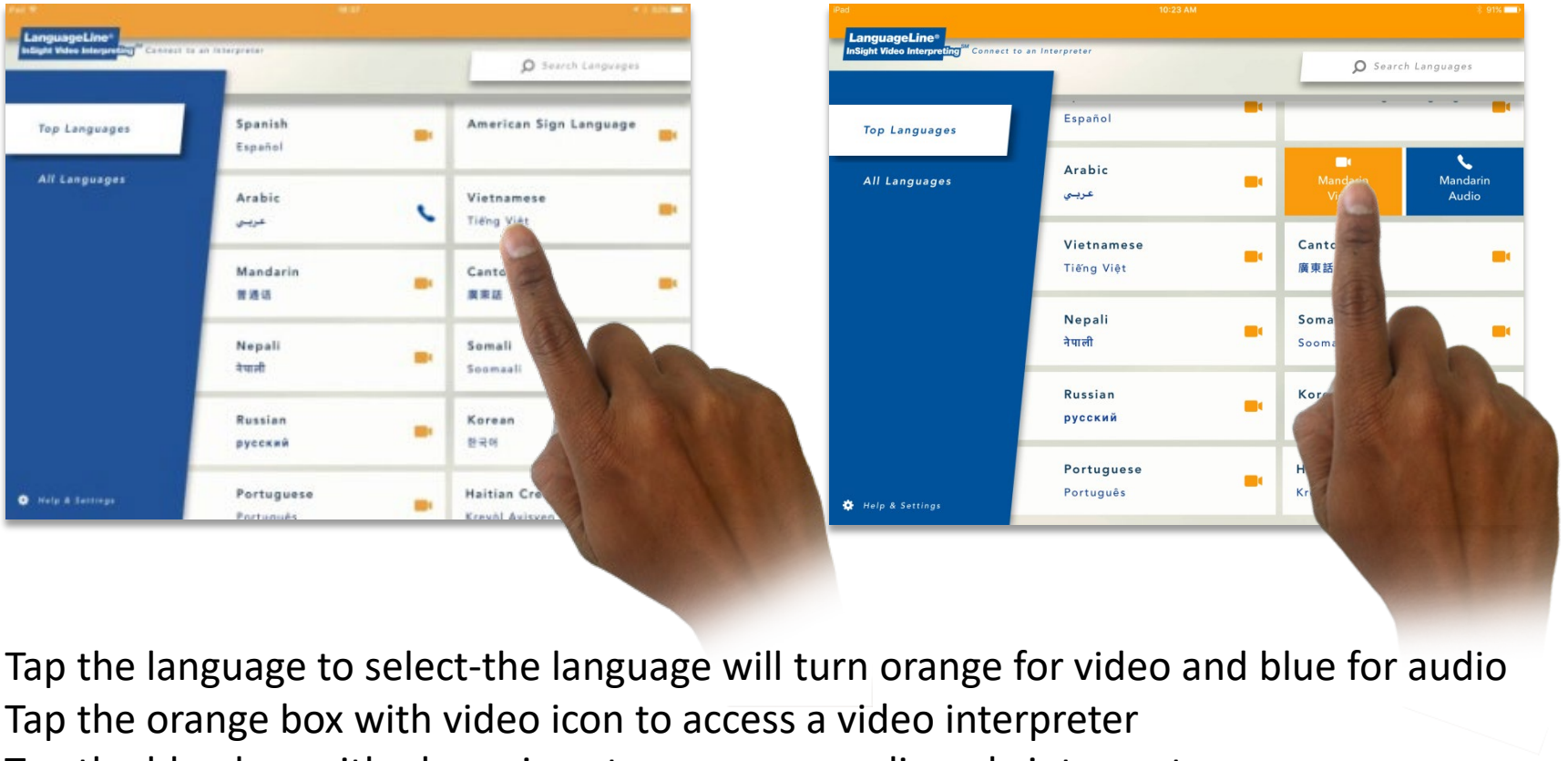


- Tap the language to select-the language will turn orange
- Tap the orange highlighted language with video icon to access a video interpreter
- While connecting to the interpreter, a full view allows for proper positioning of the iPad
- Greet your interpreter

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Accessing a Video Interpreter

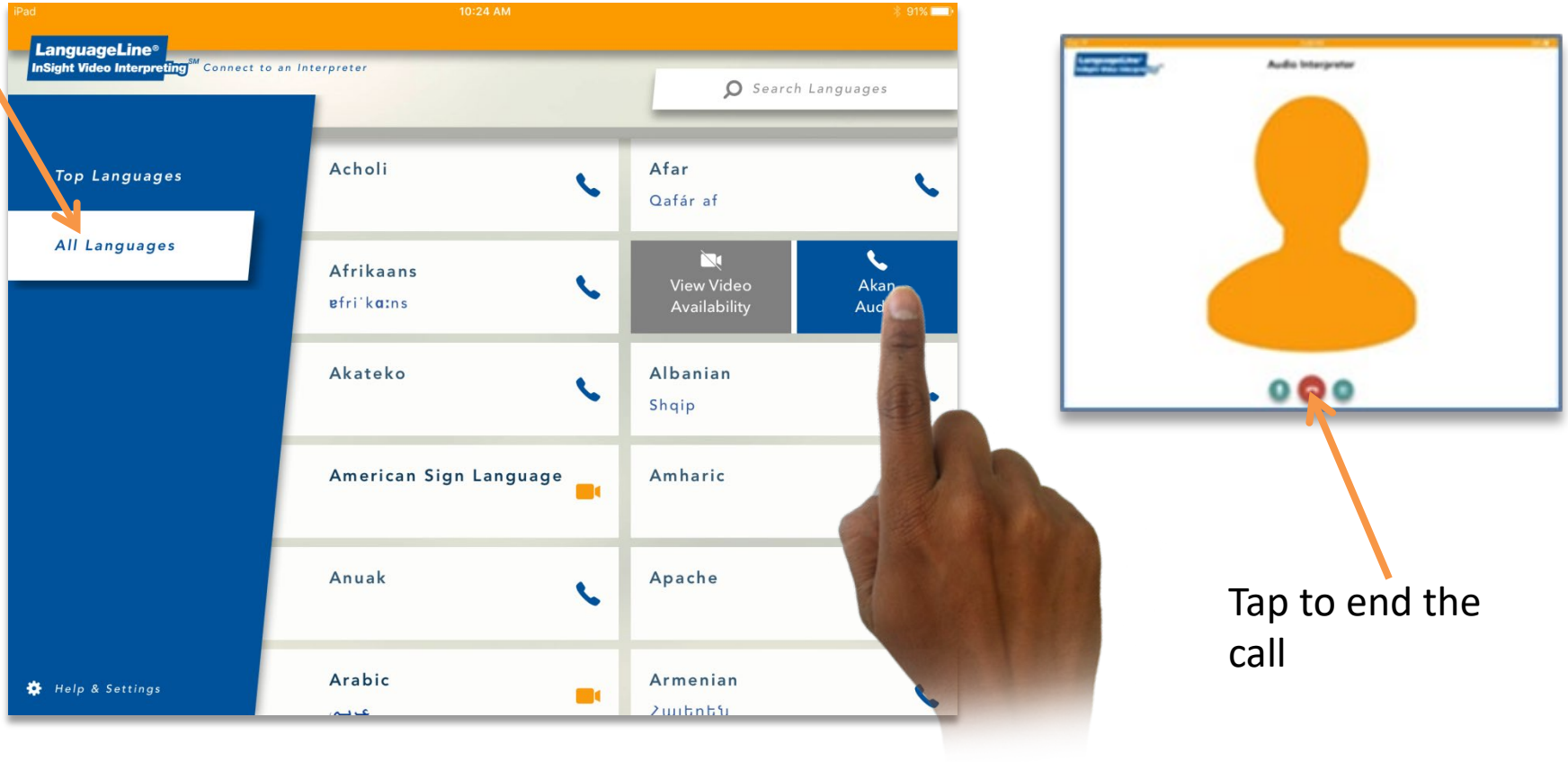


- Tap the language to select-the language will turn orange for video and blue for audio
- Tap the orange box with video icon to access a video interpreter
- Tap the blue box with phone icon to access an audio only interpreter
- While connecting to the interpreter, a full view allows for proper positioning of the iPad
- Greet your interpreter

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Accessing an Audio Interpreter



- Choose All Languages and tap the language to select
- Tap the blue highlighted language with phone icon to access an audio interpreter
- An image icon appears onscreen and your audio interpreting session begins

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Identifying the Language Preference

Language identification tools are available to enable limited English speakers to point to their preferred language. If a language still can not be identified, call an interpreter for language identification assistance.



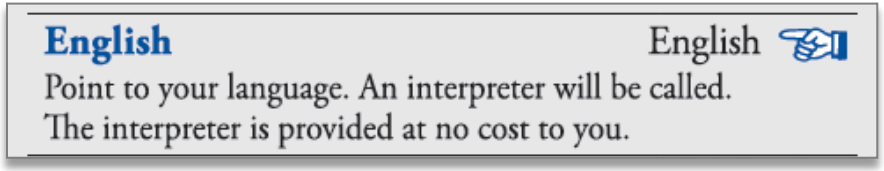
Language ID Guide



Desktop Display



Language ID Poster

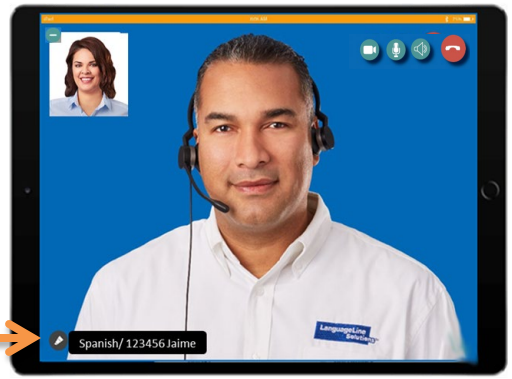


This phrase is translated into each language for self-identification.

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Working with the Interpreter

- **Brief and update the interpreter**
  - Introduce yourself and state the goal of the encounter.
  - Position the device so the interpreter and the individual can see each other.
- **Communicating with the customer**
  - Retain control of the call. The interpreter will assist with communication, but you drive the conversation.
  - Use direct speech (first person) at all times. “How are your today?”
  - Speak in short sentences, using 3-5 sentence segments and pause at the end of a thought.
  - Avoid jargon, slang and complicated technical terminology.
  - If you sense that the customer does not understand, try to rephrase or explain in a different manner or repeat what you have heard.
  - Remember, whatever the interpreter hears will be interpreted. Avoid private conversations.
- **Closing the conversation**
  - Check with the customer for understanding.
  - Document that you worked with an interpreter, include the interpreter name and ID #. This is especially important in healthcare situations.

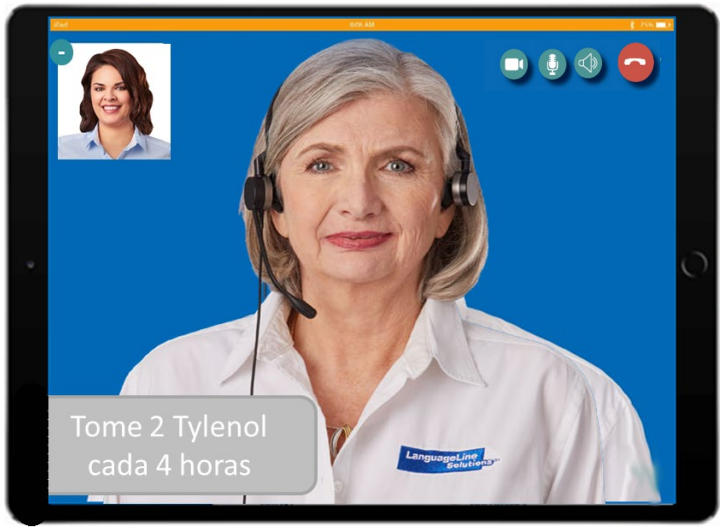


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NotePad Feature

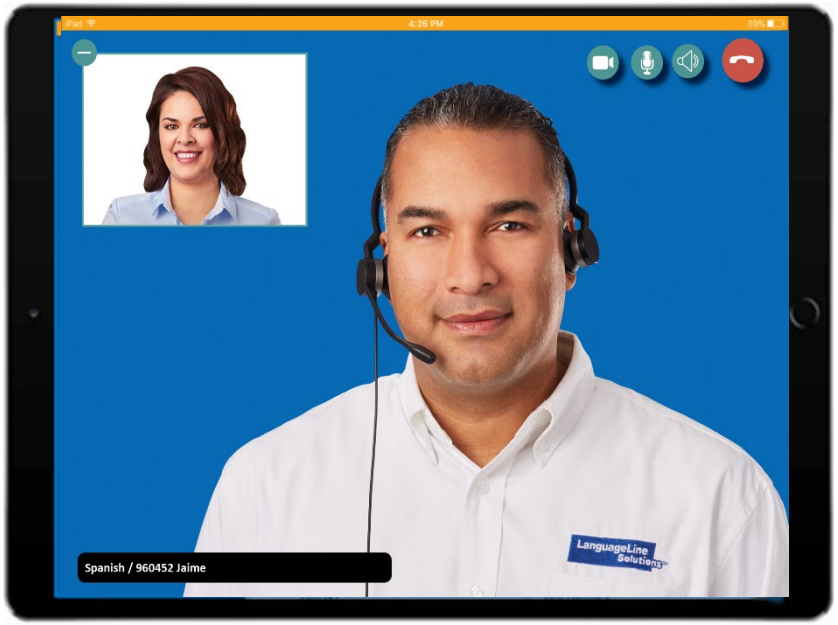
- Text can emphasize key information you would like the customer to understand and remember.
- To use the NotePad:
  - Ask the interpreter to bring up the NotePad
  - State what you want typed on the screen
  - Keep the information concise
  - The interpreter will type in the target language



***Note**: the NotePad feature may not be available for all languages at all times*

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Navigating the InSight Tap Control Buttons

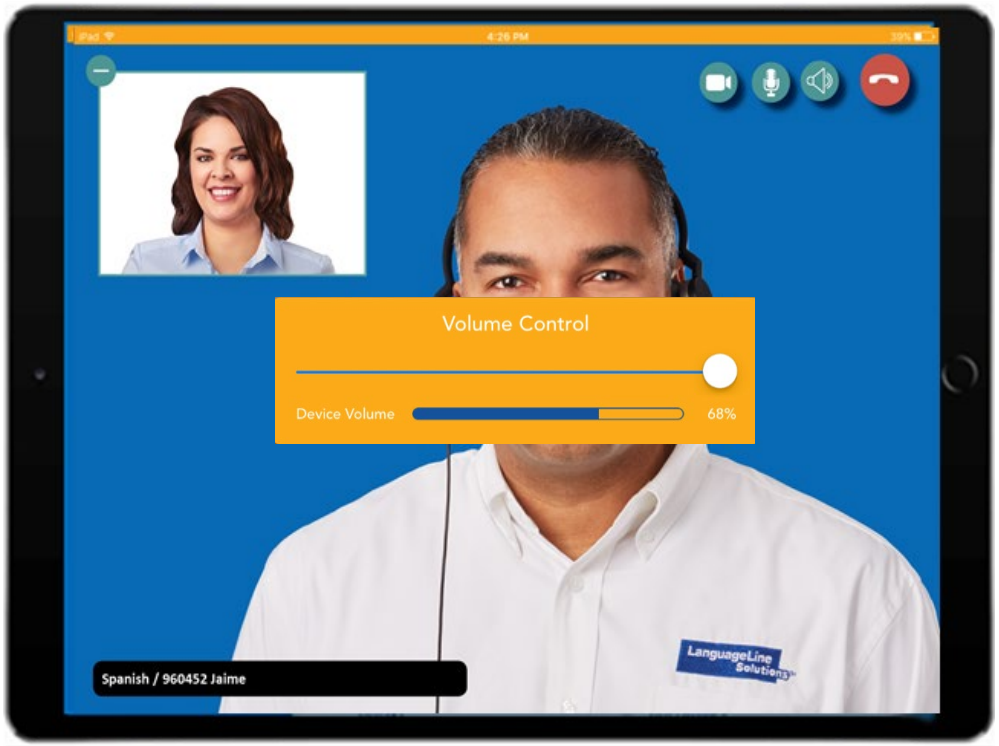


- Minimize or move the self-video window or drag the image to a different location
- Allow video privacy so the interpreter does not have video access
- Mute and un-mute audio
- End the call
- Access the in-app volume adjustment

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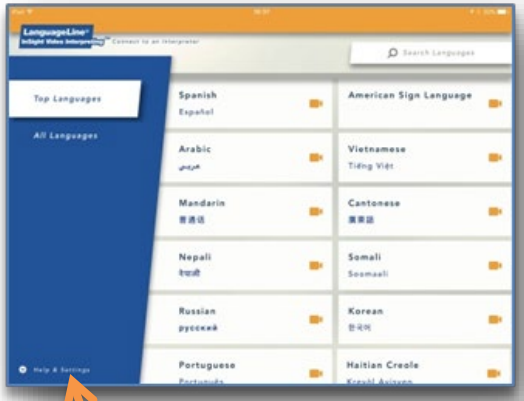
Volume Adjustment



During an active InSight call, turn up the iPad volume to the highest setting using the iPad's volume button. Next tap the volume icon to view the in-app Volume Adjustment Slider bar and adjust the volume to the desired setting.

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Access Help & Settings

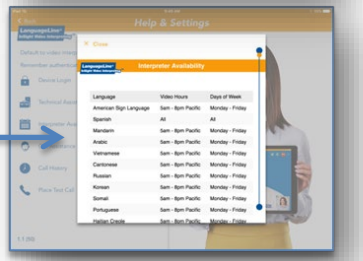


Tap Help & Settings

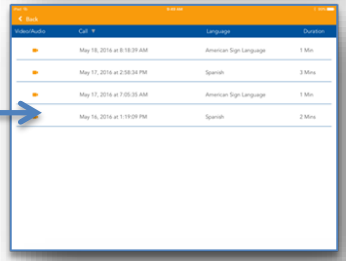
- Tap “Technical Assistance” to review a list of the most frequently asked questions and easy to understand responses with suggested actions.



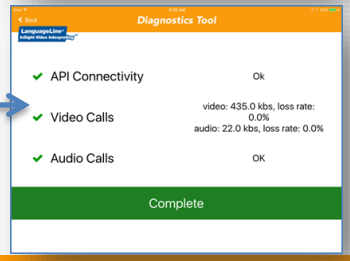
- Select “Interpreter Availability” to access the video interpreter schedule including the language, hours of video interpreter availability, and days of the week



- Tap “Call History” for a 30-day call history for this device including: video or audio call, date and time, language, and the duration of the session.



- Tap “Network Diagnostics” to help troubleshoot connectivity issues.

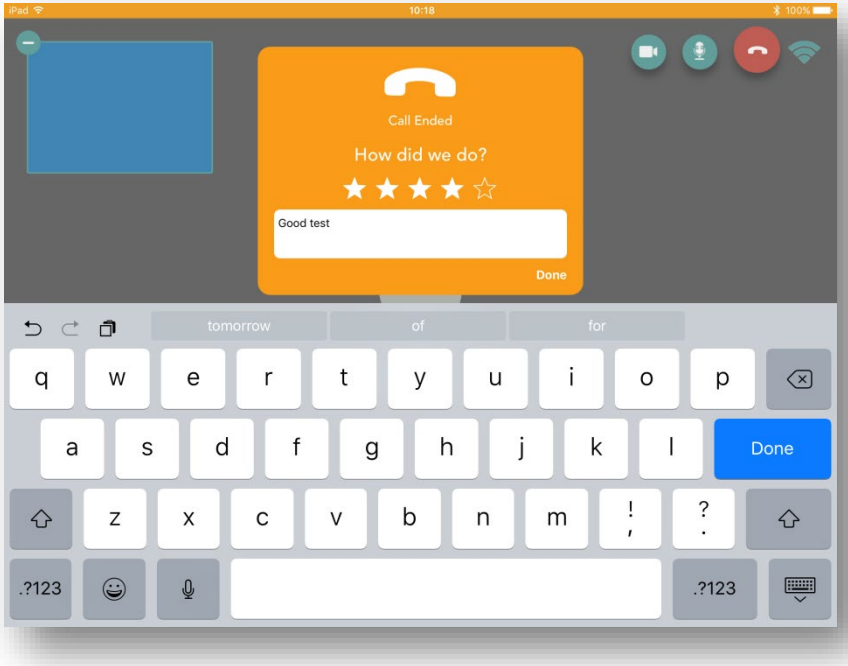


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At the End of Each Call…How Did We Do?

- Option to rate your experience after every call
- Tap 1-5 Stars – 5 is the best
- Enter brief comments
- Does not replace the VOC
- No charge to our account
- On iPads only



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LanguageLine Customer Service



24/7 InSight Technical Service

In you are having problems accessing an interpreting session contact:

InSight Technical Support 844.373.1951



Voice of the Customer:

If you wish to submit a comment or feedback to LanguageLine, visit their website at www.languageline.com and mouse over Client Services and click on Voice of the Customer. You may submit a Voice of the Customer (VOC). They welcome your communication.

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Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Circuit Court Clerk Year: 2026

Title VI Coordinator: Andre Walton, Chief Deputy of Employee Development and Community Engagement Form Completed By: Andre Walton

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

We have information regarding Title VI located in our Circuit Court Clerk Employee Manual. Please see attached (pages 23&27).

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

This information is provided in the Employee Manual as well as on posters provided in each office's breakroom. We are not aware of any annual training previously held. We will, however, utilize all the materials provided by the Human Relations Department of the Metropolitan Government of Nashville, Davidson County.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

A link to the Metropolitan Government of Nashville, Davidson County's statement of non-discrimination can be found on our website

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

See attached. (pages 33 & 34)

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

We do not have a written language plan. However, we provide forms in English and Spanish and we have a policy to assist those who have a limited or no ability to speak, read or write English. This policy permits our Deputy Clerks to assist the public if they are unable to complete the forms.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

EQUAL OPPORTUNITY EMPLOYER

As an equal opportunity employer, employment will be based upon consideration of the qualifications of all employees or applicants for employment. Discrimination based upon an applicant's or employee's race, color, gender, religion, national origin, age or disability will not be tolerated. (See "*Equal Employment Opportunity*" policy below.)

EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of the Circuit Court Clerk that all persons shall have equal employment opportunities regardless of race, color, national origin, gender, age, religion or disability. Discrimination against any person in recruitment, examination, appointment, training, promotion, retention, discipline or any other employment practices shall be prohibited. Harassment of employees in any form and for any reason is prohibited.

The personnel policies of this office shall be administered in such manner as to comply fully with the Civil Rights Act of 1964 as amended and other applicable federal and state laws as set out in this policy.

Any employee or applicant who feels that he or she has not been afforded equal opportunity for any employment action may file a complaint in accordance with the discrimination complaint procedure with an assurance of protection from harassment and retaliation.

A complete section on job discrimination regulations, guidelines and policies of the Circuit Court Clerk's Office is located at the end of this manual and is recommended reading for all employees.

NEPOTISM

Within each department to which this policy is applicable, no employees who are relatives shall be placed within the same direct line of supervision whereby one relative is responsible for supervising the job performance or work activities of another relative. Violations occurring as a result of marriage shall be resolved by a transfer within the department, transfer to another department, or resignation/termination as may be necessary to eliminate the violation. For the purposes of this policy, relative shall mean parent, stepparent, foster parent, parent in-law, child, stepchild, spouse, sister, brother, sister in-law, brother in-law, daughter in-law, son in-law, grandchild, or other family member who resides in the same household.

DRUG-FREE WORKPLACE

It is the policy of the Circuit Court Clerk to provide a safe and healthful environment for all employees. Therefore, the following are strictly prohibited during working hours, while on property of the Circuit Court Clerk, or while on business of the Circuit Court Clerk:

Evaluations should be conducted on an annual basis and placed in the employee's personnel file to establish an on-going record of performance. The employee may request a copy of the written performance evaluation at any time.

AMENDMENT OF RULES

It is the responsibility of all employees to carry out and comply with the rules and regulations contained in this manual. The employee should be aware that these rules and regulations are subject to periodic review and change by the employer. Before relying upon the provisions set out herein, it is the employee's responsibility to check with the employer regarding questions about possible changes.

DISCRIMINATION

THE LAW

In our efforts to achieve equal employment opportunity for everyone in the service of the Circuit Court Clerk, we are guided by the intent and mandates of all applicable laws. Major laws governing employment in the public sector include, but are not limited to, the following:

FEDERAL LAWS AND REGULATIONS

1) CIVIL RIGHTS ACT OF 1964, Title VI, provides 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 financial assistance.
2) CIVIL RIGHTS ACT OF 1964, Title VII, makes it unlawful for an employer to discriminate as to hiring, firing, promotion, compensation, terms, conditions or privileges of employment on the basis of race, color, religion, gender or national origin. It also forbids employers to limit, segregate or classify employees in any way that tends to deprive any individual of employment opportunities or adversely affect his or her employment status because of race, color, religion, gender or national origin. This also applies to people in apprenticeship, training and retraining programs. It is also illegal to indicate a preference in advertisements relating to employment.

   MAJOR AMENDMENTS

   1. Pregnancy Act of 1978 clarified that women affected by pregnancy and related conditions must be treated the same as other applicants and employees on the basis of their ability or inability to work.
   2. Guidelines on Discriminations Because of Sex (1972 and 1980) establish specific prohibitions of discrimination based on gender and make sexual harassment a violation of Title VII.

INCIDENT/COMPLAINT PROCEDURE

A complaint of discrimination as outlined in the Guidelines on Discrimination, including a complaint of sexual harassment, may be filed according to the steps defined below. A complaint should initially be filed within twenty (20) working days of the occurrence or reasonable knowledge of the alleged discrimination. If it is a continuing problem, the complaint should state when it began and the progression to the time of the complaint. A complaint may be filed by a current employee or by an applicant and by an individual or a group of people. Any complainant shall have the right to choose one representative to be with him or her at all stages of the complaint procedure. Confidentiality will be maintained during the complaint procedure to the degree allowed by law. Reprisal or retaliation against the complainant or witnesses participating in the investigation is prohibited and is grounds for disciplinary action.

a) Any employee or applicant who feels that he or she has been subjected to discrimination of any kind may file a complaint with his or her office management. If the office management of the employee is not a viable option as an appropriate person to file the complaint based on the circumstances of the situation, the employee may reach out directly to the Chief Deputy of Employee Development and Community Engagement with the organization.

   Office management shall try to remedy any actual or perceived problem without additional formal procedures.

   Office management shall inform the complainant of his or her decision within five (5) working days. If the complaint is not resolved at this level, the complainant may proceed to Step B as long as the complainant does so within ten (10) working days of receiving the office management's decision.

   If office management is the offending party, or if the employee feels that office management will not or cannot objectively handle the complaint, the employee should file the complaint in accordance with Step B.

b) A complaint of discrimination may be filed, in writing, with the chief clerk or his or her designee. (If the department head is the alleged offending party, the individual should file his/her complaint with the Chief Deputy of Employee Development and Community Engagement for the Circuit Court Clerk as set out in Step C).

   The department head or designee, after thorough investigation, should take the necessary steps to correct any problem found to exist. Such correction may include disciplinary action against an offending employee -- especially if the charge involves harassment. The department investigation shall be completed within twenty (20) working days, with an extension of an additional twenty (20) working days if needed.

   The department head shall notify the complaining party of his or her decision within ten (10) working days following the conclusion of the investigation. If the chief clerk feels

that the charges warrant a third party investigation, or if the charges involve rules or policies which are beyond his or her scope of authority, the chief clerk may refer the complaint to Step C.

c) If the individual feels that the complaint has not been remedied by the chief clerk, the complainant should file a written complaint with the Chief Deputy of Employee Development and Community Engagement for the Circuit Court Clerk. The written complaint should be filed within ten (10) working days from the date of the letter sent by the department head as set out in Step B.

   Upon receipt of a written complaint or referral by a chief clerk, the Chief Deputy of Employee Development and Community Engagement will conduct an investigation within twenty (20) working days, with an extension of up to twenty (20) additional working days if needed. The Chief Deputy of Employee Development and Community Engagement will make a full report to the complainant and the chief clerk, advising of the findings as to the truth of the allegations of discrimination. As a result of the investigation and the findings of the Chief Deputy of Employee Development and Community Engagement, the chief clerk shall then review his or her previous decision to determine if the appropriate action was taken. Within ten (10) working days after receipt of the final report, the chief clerk shall send a written notice to the complaining party, advising of action being taken.

RIGHT OF APPEAL

Any complaining party may present his or her written complaint of discrimination to the Circuit Court Clerk, after the Chief Deputy of Employee Development and Community Engagement has investigated the matter, if the employee feels that the chief clerk has failed to adequately address the discrimination problem.

The Circuit Court Clerk or designee shall review the complaint and make necessary recommendations to the chief clerk of the complaining party. Any written complaint must be submitted for review to the Circuit Court Clerk within ten (10) working days of the final determination by the chief clerk as set out in Step C.

The Circuit Court Clerk recognizes that allegations of discrimination are difficult and often embarrassing for all parties involved. Efforts should be made by employees and management to deal with such allegations in a professional and responsible manner.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Clerk and Master Year: 2026

Title VI Coordinator: none currently Form Completed By: Maria M. Salas, Clerk and Master

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

If so, how is the training provided?

☑ Not Provided - Department does **NOT** directly receive Federal financial assistance.
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not. Department does **NOT** directly receive Federal financial assistance.

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other Do not currently provide as department does **NOT** directly receive Federal financial assistance.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? none

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

None currently. Department does **NOT** directly receive Federal financial assistance.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No - Department does **NOT** directly receive Federal financial assistance.

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

None currently. Department does **NOT** directly receive Federal financial assistance.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Codes Administration Year: 2026

Title VI Coordinator: Julie Welch Form Completed By: Julie Welch

Form Completion Date: 6/3/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Through Metro's new hire orientation process

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No (I plan to attend the fall session)

How does your department disseminate Title VI information (including your language access plan) to all employees?

Information is posted within common areas in the department (breakrooms, admin office, hallway bulletin board)

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

On the department's website

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☑ Other Referring any complaints to Metro Human Relations

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? None

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No All employees have been provided information about Language Line and translating information is available to customers in all public spaces within the department. Documents will be attached to the email.

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The Codes Department utilizes translation services through Language Line.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

LanguageLine Solutions®

Quick Reference Guide

Metro Nashville Department of Codes and Building Safety

HOW TO ACCESS AN INTERPRETER

1. DIAL: **866-874-3972**

2.PROVIDE:

OPI CLIENT ID#:**667048**

AUTHENTICATION CODE: **MMH6HG4HFG**

3.INDICATE: the language you need

4.PROVIDE: additional information, if required.

Document the interpreter name and ID number for your reference.
Brief the interpreter and give any special instructions.

IMPORTANT INFORMATION:

WORKING WITH AN INTERPRETER – At the beginning of the call, briefly tell the interpreter what you wish to accomplish on the call. When the limited English proficient individual is on the call, speak directly to them, not to the interpreter. Remember to pause at the end of a complete thought. To ensure accuracy, your interpreter may need to ask for clarification or repetition.

3-WAY CALL – Use the conference feature on your phone, and follow the instructions above to connect to an interpreter. If you are initiating the call, have the interpreter on the line first, then call the limited English proficient individual. If you are receiving a call, ask the caller to please hold, and then conference in the interpreter.

LANGUAGELINE DUAL HANDSET PHONE – If you have the LanguageLine Dual handset phone, lift the handset and press the interpreter button, then follow the prompts. Once connected to an interpreter, give the second handset to the limited English proficient individual.

CUSTOMER SERVICE – To provide feedback, commend an interpreter, or report any service concerns, call 1-800-752-6096 or go to www.LanguageLine.com and click on the "Customer Service" tab, scroll to "Provide Feedback" and complete a "Voice of the Customer" form.

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Welcome to the LanguageLine family.

To access a phone interpreter, please call your assigned toll-free number and be prepared with your Client ID and the language you are requesting. Your toll-free number and Client ID are documented above.

To access a video interpreter, please open the LanguageLine app. We think you will find it highly intuitive. On your first visit, you will need to enter a one-time authorization code. Then enter the language you are requesting. Your authorization code is documented above.

Support Materials

To ensure your success, we can provide you with:

- **Language ID** posters, desktop displays and Language ID Guides, which create awareness that services are available.
- **Personalized quick reference guides (QRGs)**, which help your staff quickly and easily access our professional interpreters. Badges, wallet cards, flyers, and labels are printed with easy to follow instructions.
- **Implementation and Optimization Training Guides**, which support self-implementation and staff training.

We will be happy to assist you with any language-access needs you may have, including phone, video, or onsite interpreting, as well as translation and localization of written materials. Please contact your Account Executive or Customer Care at 800-752-6096 / CustomerCare@LanguageLine.com.

Client Name:	**Metro Nashville Department of Codes and Building Safety**
Account #:	**9022018430**
Toll Free Number:	**866-874-3972**
OPI Client ID#:	**667048**
Authentication Code:	**MMH6HG4HFG**
Your Account Executive:	**Joe Matthews**

Phone:	**(831) 648-7140**
Email:	**JMatthews@languageline.com**

Attached are several resources to assist with language access, including:

- Quick Reference Guide for Interpreter Access
- Language Identification Guides
- Interpreter Services Information
- Language Assistance Wallet Cards

These materials can be kept at your desk or carried with you in the field for quick reference and easy access. If language assistance is needed, individuals can point to their preferred language on the identification guides to help connect them with the appropriate interpreter services.

For phone conversations requiring an interpreter, staff can initiate a three-way call by dialing our dedicated interpreter services number and adding the interpreter to the call.

Additionally, the link below provides access to a variety of language access resources, including tools, training videos, PowerPoint presentations, reference guides, and other helpful information designed to support communication with individuals who have limited English proficiency.

Please take a few moments to familiarize yourself with these resources and utilize them both in the office and while conducting field work to ensure effective communication and customer service.

https://www.languageline.com/client-support-center

Metro Nashville Codes and Building Safety

To Access an Interpreter

1. *Dial:* **866-874-3972**
2. *Provide:* **Client ID 667048**
3. *Indicate:* **Language**

Document the interpreter name and ID # for reference. Brief the interpreter and give any special instructions.

Metro Nashville Codes and Building Safety

To Access an Interpreter

1. *Dial:* **866-874-3972**
2. *Provide:* **Client ID 667048**
3. *Indicate:* **Language**

Document the interpreter name and ID # for reference. Brief the interpreter and give any special instructions.

Metro Nashville Codes and Building Safety

To Access an Interpreter

1. *Dial:* **866-874-3972**
2. *Provide:* **Client ID 667048**
3. *Indicate:* **Language**

Document the interpreter name and ID # for reference. Brief the interpreter and give any special instructions.

Metro Nashville Codes and Building Safety

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Europe

Albanian Shqip
Tregoni me gisht gjuhën tuaj. Do të thërrasim një përkthyes. Përkthyesi ofrohet falas për ju.

Armenian Հայերէն
Նշեք, թե որ լեզվով եք խոսում: Թարգմանիչ կկանչենք: Թարգմանչի ծառայությունները տրամադրվում են անվճար:

Basque Euskara
Zure hizkuntza aukeratu. Jarraian interprete bati deituko diogu. Zerbitzu hau doakoa da.

Bosnian Bosanski
Pokažite svoj jezik. Pozvat ćemo tumača. Usluge tumača su besplatne za vas.

Bulgarian Български
Посочете вашия език. Ще бъде извикан преводач. Преводачът е осигурен безплатно за вас.

Croatian Hrvatski
Pokažite svoj jezik. Prevoditelj će biti pozvan. Prevoditelja ćete dobiti besplatno.

Czech Čeština
Ukažte na váš jazyk. Bude zavolán tlumočník. Tlumočení je pro vás bezplatné.

Danish Dansk
Peg på dit sprog. En tolk vil blive tilkaldt. Tolken tilbydes uden omkostninger for dig.

Dutch Nederlands
Wijs uw taal aan. Er zal contact worden opgenomen met een tolk. De service van de tolk is geheel gratis.

Estonian Eesti keel
Osutage oma keelel. Vastava tõlgiga võetakse ühendust. Tõlketeenus on teie jaoks tasuta.

Finnish Suomi
Osoita maasi kieltä. Kutsumme tulkin paikalle. Tulkin käyttö on sinulle ilmaista.

French Français
Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

German Deutsch
Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird angefordert. Der Dolmetscher ist für Sie kostenlos.

Greek Ελληνικά
Δείξτε τη γλώσσα σας και θα καλέσουμε ένα διερμηνέα. Ο διερμηνέας σας παρέχεται δωρεάν.

Hungarian Magyar
Válassza ki a nyelvet. Tolmácsot fogunk hívni. A tolmács az Ön számára díjtalan.

Europe - continued

Icelandic Íslenska
Bentu á þitt tungumál. Það verður hringt í túlk. Túlkurinn er þér að kostnaðarlausu.

Italian Italiano
Indicare la propia lingua. Un interprete sarà chiamato. Il servizio è gratuito.

Lithuanian Lietuvių
Nurodykite savo kalbą. Bus pakviestas vertėjas. Vertėjas jums bus suteiktas nemokamai.

Macedonian Македонски
Покажете на јазикот на кој зборувате. Ќе повикаме преведувач. Услугите на преведувачот се бесплатни.

Norwegian Norsk
Pek på språket dit. En tolk vil bli tilkalt. Tolken tilbys kostnadsfritt for deg.

Polish Polski
Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.

Portuguese Português
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Romanian Română
Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret caare vă este asigurat gratuit.

Russian Русский
Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.

Serbian Српски
Покажите свој језик. Преводилац ће бити позван. Преводилац је за вас обезбеђен бесплатно.

Slovak Slovenčina
Ukážte na svoj jazyk. Zavoláme tlmočníka. Tlmočenie je pre vás bezplatné.

Spanish Español
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Swedish Svenska
Peka på ditt språk. En tolk kommer att tillkallas. Tolken erbjuds utan kostnad för dig.

Ukranian Українська
Вкажіть вашу мову. Вам викличуть перекладача. Послуги перекладача надаються безкоштовно.

Yiddish יידיש
וועיזט אָן אויף אייער שפּראַך און מען וועט רופן אַן איבערזעצער. איר דאַרפט גאָרניט באַצאָלן פאַר דער איבערזעצונג.

Pacific Islands

Fijian Vosa Vakaviti
Dusia na nomu vosa. Ni na Vakarautaki mai e dua na dau vakadewa vosa. Na dau vakadewa vosa e sega ni saumi.

Ilocano Ilokano
Itudo yo ti sao yo. Ag awag da ti maysa nga mangipat-patarus nga tumulong kadakayo nga awan ti bayad na.

Indonesian Bahasa Indonesia
Tunjukkan bahasa Anda. Penerjemah akan dihubungi. Penerjemah disediakan gratis tanpa dikenakan biaya.

Malay Bahasa Melayu
Tunjukkan bahasa anda. Jurubahasa akan dihubungi. Jurubahasa akan disediakan tanpa anda dikenakan bayaran.

Marshallese Kajin Majól
Kelet kajin eo am. Im renaaj kúr juón am Ri-Ukok. Ri-Ukok eo enaaj jibañ eok ilo ejjelok wóneen.

Samoan Fa'asamoa
Fa`asino lau gagana. Ole a vala`au se fa`amatala`upu. Ua saunia se fa`amatala`upu e aunoa ma se tau e te totogiina.

Tagalog Tagalog
Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.

Tongan Lea Faka-Tonga
Tuhu`i mai ho`o lea fakafonua. `E ui ha fakatonulea. `Oki ta`etotongi kia `a e fakatonulea.

North America, South America, and Caribbean

French Français
Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

Haitian Creole Kreyòl
Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

Navajo Diné k'ehjí
Nizaad biká'ígíí bich'į' dah diilníh. Ata' halne'é ła' hágo bi'di'dooniił. Ata' halne'é éí doo haida yit'éego bik'é ni'diiléeł da. T'áájíík'e ná ata' hodoolnih.

Portuguese Português
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Spanish Español
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

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Language Identification Guide

As a LanguageLine Solutions® client you have access to over-the-phone interpreting 24 hours a day, 7 days a week. Offer this guide in face-to-face situations to determine which language a person speaks. The most frequently encountered languages in North America are grouped by the geographical region where they are commonly spoken.

- Locate the geographical region where you believe the speaker may be from. (Pacific Islands, Europe, etc.)
- Show the person the languages listed for that region. Underneath each language is the translation of the statement below:

English English
Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

- We offer interpreting from English into more than 200 languages. If you are unable to identify the language, our call representative will help you.
- To access an interpreter:

Please visit www.LanguageLine.com for information on all our language access solutions:

- Over-the-Phone, Video Remote, and Onsite Interpreting
- Bilingual and Interpreter Staff Testing and Training
- Translation and Localization

CustomerCare@LanguageLine.com
1-800-752-6096

India, Pakistan, and Southwest Asia

Bengali বাংলা
আপনার ভাষার দিকে নির্দেশ করুন। একজন দোভাষীকে ডাকা হবে।
দোভাষী আপনি নিখরচায় পাবেন।

Gujarati ગુજરાતી
તમારી ભાષાનો ઉલ્લેખ કરો. દુભાષિયાને બોલાવી શકાશે.
દુભાષિયાને બોલવવામાં તમારે ખર્ચ આપવો નહિ પડે.

Hindi हिंदी
अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुभाषिया
बुलाया जाएगा। आपके लिए दुभाषिया की निशुल्क व्यवस्था की जाती है।

Malayalam മലയാളം
നിങ്ങളുടെ ഭാഷയിലേക്ക് ചൂണ്ടുക. ഒരു വ്യാഖ്യാതാവിന്റെ
സേവനം ലഭ്യമാക്കും. ഈ വ്യാഖ്യാതാവിന്റെ സേവനം
നിങ്ങൾക്ക് സൗജന്യമായാണ് നൽകുന്നത്.

Nepali नेपाली
आफ्नो भाषातर्फ औंल्याउनुहोस्। एक दोभाषेलाई बोलाइनेछ।
तपाईंको विना कुनै खर्चको, एकजना दोभाषे उपलब्ध गराइनेछ।

Punjabi ਪੰਜਾਬੀ
ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆ ਬੁਲਾਇਆ
ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆ ਦੀ ਮੁਫਤ ਇੰਤਜ਼ਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।

Sinhalese සිංහල
ඔබේ භාෂාව පෙන්වන්න. භාෂා පරිවර්තකයෙකු කැඳවෙනු ඇත.
භාෂා පරිවර්තකය ඔබ වෙත නොමිලේ සැපයෙනු ඇත.

Tamil தமிழ்
உங்கள் மொழியைச் சுட்டிக்காட்டுங்கள்.
மொழிபெயர்ப்பாளர் ஒருவர் அழைக்கப்படுவார்.
மொழிபெயர்ப்பாளருக்காக நீங்கள் செலவு செய்யத்தேவையில்லை.

Telugu తెలుగు
మీ భాషను గుర్తించండి. మీ భాషానువాదకులను పిలువబడును.
మీకు ఎటువంటి ఖర్చు లేకుండా భాషానువాదకులను సమకూర్చబడును.

Urdu اُردو
اپنی زبان پر اشارہ کریں۔ ایک ترجمان کو بلاجائے گا۔
ترجمان کا انتظام آپ پر بغیر کسی خرچ کے کیا جائے گا۔

Africa

Acholi Acoli
Siem thok ma iyae. Ja loko ibiro luongi.
Jaloko no ochiuni ma onge chudo.

Amharic አማርኛ
ቋንቋዎትን ያመልክቱ። አስተርጓሚ ይጠራል።
አስተርጓሚው በነጻ ይቀርብልዎታል።

Arabic عربي
أشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما
سيتم إحضار المترجم الفوري مجانًا.

Africa - continued

Dinka Thok monyjang
Weet ten thoungdie. Raan weetgeryic a col.
Agerwelyic ku a cin aroop biyik yen.

French Français
Indiquez votre langue et nous appellerons un
interprète. Le service est gratuit.

Hausa Hausa
Nuna zuwa ga yarenka. Za a kira tafinta. An samar
maka da tafintan ne ba tare da sai an biya kudi ba.

Italian Italiano
Indicare la propia lingua. Un interprete sarà chiamato.
Il servizio è gratuito.

Nuer Mägäcä luqäddä
Ku tïlmään luqäddäädä. Turjubään äyää looyëërï-doonää.
Turjubäänkä lägugu yëëräyo wää bïläash.

Oromo Oromo
Gara afaan keetti eeri. Turjumaanni ni waamama.
Turjumaanni beesee takka malee siif qophaawa.

Portuguese Português
Indique o seu idioma. Um intérprete será chamado. A
interpretação é fornecida sem qualquer custo para você.

Portuguese Creole Crioulo Portugues
Nho pontâ pa lingu qui nho ta papiâ. No ta arranja um interprete
pa nho. No ta rranje um interprete e nho ca ta pagâ nada pa el.

Somali Af-Soomali
Farta ku fiiqluqadaada… Waxa laguugu yeeri doonaa
turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.

Swahili Kiswahili
Onyesha lugha yako. Mkalimani ataitwa.
Utapewa mkalimani bila gharama yoyote.

Tigrinya ትግርኛ
ቋንቋኹም ኣመልክቱ። ኣተርጓሚ ክጽዋእ ይኽእል እዩ።
ንኣተርጓሚ እትከፍልዎ ዝኾነ ክፍሊት የለን።

Wolof Wolof
Taannal sa lakk ngir fiou bolela ak kou degg sa lakk
mou dimbeuli leu. Ndimbeul bi do ci fey dara.

Yoruba Yorùbá
Tọ́ka sí èdè rẹ. A ó pe òǵbùfọ̀ kan.
Ọ̀fẹ́ ni a ó pe òǵbùfọ̀ yií fún ọ.

Middle East

Arabic عربي
أشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما
سيتم إحضار المترجم الفوري مجانًا.

Armenian Հայերէն
Նշեք, թե որ լեզվով եք խոսում: Թարգմանիչ կկանչենք:
Թարգմանչի ծառայություններըը տրամադրվում են անվճար:

Azerbaijani Azərbaycan dili
Danışdığınız dili bildirin. Sizin üçün tərcüməçi dəvət
olunacaq. Tərcümə xidməti üçün ödəniş tələb olunmur.

Dari دری
زبان مود نظر را نشانی کنید. یک ترجمان فراخوانده خو
اهد شد. این برای شما کدام هزینه در پی نخواهد داشت.

Farsi فارسي
زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست
خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.

Hebrew עברית
הצבע לעבר השפה שלך, ואנחנו נתקשר למתורגמן.
שירותו של המתורגמן ניתן ללא תשלום.

Kurdish كوردى
ئاماژە بە زمانەکەتان. وەرگێڕێک بانگ دەکرێت.
بۆ ئامادەکردنی وەرگێڕ هیچ پارەیەک لە تۆ وەرناگیردرێت.

Pashto پښتو
خپلې ژبې ته اشاره وکړئ. یو ژباړونکی به راوبلل شي.
ستاسو له پاره د ژباړونکي انتظام په وریا توګه کیږي.

Turkish Türkçe
Konuştuğunuz dili gösterin. Sizin için bir çevirmen
aranacaktır. Bu çevirmen size ücretsiz sağlanır.

Asia

China	請指認您的語言，以便為您提供免費的口譯服務。	请指认您的语言，以便为您提供免费的口译服务。
Cantonese	廣東話	广东话
Chaochow	潮州話	潮州话
Fukienese	福建話	福建话
Mandarin	國語	普通话
Shanghai	上海話	上海话
Taiwanese	台灣話	台湾话
Toishanese	台山話	台山话

Asia- continued

Burmese မြန်မာ
သင့်ဘာသာစကားကို ညွှန်ပြပါ။ စကားပြန် ခေါ်ပေးပါမယ်။
သင့်အတွက် စကားပြန် အခမဲ့ ပေးပါမယ်။

Hmong Hmoob
Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus.
Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.

Indonesian Bahasa Indonesia
Tunjukkan bahasa Anda. Penerjemah akan dihubungi.
Penerjemah disediakan gratis tanpa dikenakan biaya.

Japanese 日本語
あなたの話す言語を指してください。
無料で通訳サービスを提供します。

Karen ကညီကျိာ်
နဉ်လီၤဆုနကျိာ်.တၢ်ကကီးပှၤကျိာ်ထံတၢ်.
တၢ်ဟှဉ်ပှၤကျိာ်ထံတၢ်လၢတဆိဉ်ဒီးအပူးအကလံၤဘဉ်.

Khmer (Cambodian) ខ្មែរ (កម្ពុជា)
សូមចង្អុលភាសាអ្នក។ យើងនឹងហៅអ្នកបកប្រែភាសាមកជូន។
អ្នកបកប្រែភាសានឹងជួយអ្នកដោយមិនគិតថ្លៃ។

Korean 한국어
귀하께서 사용하는 언어를 지정하시면 해당
언어 통역 서비스를 무료로 제공해 드립니다.

Laotian ພາສາລາວ
ຊີ້ບອກພາສາທີ່ເຈົ້າເວົ້າໄດ້. ພວກເຮົາຈະຕິດຕໍ່ນາຍພາສາໃຫ້.
ທ່ານບໍ່ຕ້ອງເສຍເງິນຄ່າແປໃຫ້ແກ່ນາຍແປພາສາ.

Malay Bahasa Melayu
Tunjukkan bahasa anda. Jurubahasa akan dihubungi.
Jurubahasa akan disediakan tanpa anda dikenakan bayaran.

Mien Mein
Nuqv longc meih nyei waac fingx. Ninh mbuo porv waac mienh oix zuqc
heuc daaih lorx meih. Ninh mbuo porv waac mienh tengx nyei jiauv louc
yaac baeqc thenx maiv zuqc cuotv zinh nyaanh faan-liuc.

Mongolian Монгол
Танай хэлээ эаа. Орчуулагч дуудагдана.
Орчуулагчийн тусламж танд үнэгүй байх болно.

Thai ไทย
ช่วยชี้ที่ภาษาที่ท่านพูด แล้วเราจะจัดหาล่ามให้ท่าน
การใช้ล่ามไม่ต้องเสียค่าใช้จ่าย

Vietnamese Tiếng Việt
Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được
gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

♻ Printed on recycled paper. 2/18

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Interpretation Services Available

English Translation: Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

American Sign Language



Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

Arabic

العربية

أشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما سيتم إحضار المترجم الفوري مجانًا.

Bengali

বাংলা

আপনার ভাষার দিকে নির্দেশ করুন। একজন দ্বোভাষীকে ডাকা হবে। দ্বোভাষী আপনি নিখরচায় পাবেন।

Burmese

မွန်မာ

သင့်ဘာသာစကားကိုညွှန်ပြပါ။ စကားပြန်ခေါ်ပေးပါမယ်။
သင့်အတွက်စကားပြန်အခမဲ့ပေးပါမယ်။

Cantonese

廣東話

請指認您的語言，以便為
您提供免費的口譯服務。

Farsi

فارسي

زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.

French

Français

Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

Haitian Creole

Kreyòl

Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

Hindi

हिंदी

अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुभाषिया बुलाया जाएगा। आपके लिए दुभाषिया की निशुल्क व्यवस्था की जाती है।

Hmong

Hmoob

Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.

Italian

Italiano

Indicare la propia lingua. Un interprete sarà chiamato. Il servizio è gratuito.

Japanese

日本語

あなたの話す言語を指してください。無料で通訳サービスを提供します。

Korean

한국어

귀하께서 사용하는 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.

Mandarin

普通话

请指认您的语言，以便为
您提供免费的口译服务。

Nepali

नेपाली

आफ्नो भाषातर्फ औंल्याउनुहोस्। एक दोभाषेलाई बोलाइनेछ। तपाईंको कुनै खर्च बिना, एकजना दोभाषे उपलब्ध गराइनेछ।

Polish

Polski

Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.

Portuguese

Português

Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Punjabi

ਪੰਜਾਬੀ

ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆ ਦਾ ਮੁਫਤ ਇੰਤਜ਼ਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।

Romanian

Română

Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret care vă este asigurat gratuit.

Russian

Русский

Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.

Somali

Af-Soomaali

Farta ku fiiqluqadaada… Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.

Spanish

Español

Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Tagalog

Tagalog

Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.

Vietnamese

Tiếng Việt

Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

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Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Community Review Board Year: 2026

Title VI Coordinator: Keturah Barnett Form Completed By: Keturah Barnett

Form Completion Date: 6/10/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☐ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

On SharePoint and during New Employee Onboarding

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other Referral to HRC

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☑ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
Shawn Whitsell	Black or African American
Joe Brown	White
Walter Searcy	Black or African American
Heather Meshell	White
Mark Wynn	White
John Shrader	White
Taniesha Westbrook	Black or African American

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Nashville Community Review Board
Language Access Plan
2026

The Nashville Community Review Board's Language Access Plan (LAP) outlines the strategies and procedures to ensure effective communication with individuals who have Limited English Proficiency (LEP) within our community. Our commitment is to provide equitable access to all programs, services, and activities, regardless of an individual's primary language by:

- Ensure that LEP individuals have access to Community Review Board programs, services, and activities.
- Provide guidance to staff on how to provide language assistance written or audible.
- Outline the procedures and resources available for language assistance.

1. Assessment of Language Needs

A comprehensive understanding of the language needs of the populations we serve is fundamental to an effective LAP. This section details our approach to assessing these needs.

1.1 Data Collection and Analysis:

- **Demographic Data Review:** Regularly review U.S. Census Bureau data, local demographic studies, and community-specific linguistic profiles to identify the prevalent non-English languages spoken within our service area.
- **Service Interaction Data:** Collect and analyze data on language needs identified during interactions with the public, including:
    - Number of requests for interpretation/translation services.
    - Languages for which interpretation/translation was requested.
    - Languages of documents submitted by the public.
    - Feedback from staff regarding communication barriers encountered.
- **Community Input:** Engage with community organizations, advocacy groups, and cultural centers that serve LEP populations to gather qualitative data on language access challenges and needs. Conduct surveys, focus groups, or informal discussions to solicit direct input from LEP individuals.

1.2 Needs Assessment Tools and Frequency:

- **Annual Language Needs Assessment:** Conduct an internal assessment with staff across all divisions to identify common languages encountered, specific service areas where LEP individuals are most frequently served, and challenges in providing language assistance.

- **Documentation of Language Assistance Requests:** Maintain a centralized log of all requests for language assistance, including the language, type of service (interpretation/translation), and outcome. This data will inform resource allocation and future planning.

2. Staff Training

Adequately trained staff are crucial for the successful implementation of a Language Access Plan. This section outlines our training initiatives.

2.1 Core Training Modules:

- **Cultural Competency Training:** All staff will receive training on cultural sensitivity and awareness, emphasizing respectful communication with individuals from diverse linguistic and cultural backgrounds. This includes understanding potential cultural nuances that may affect communication.
- **Language Access Policy and Procedures:** Comprehensive training on the department's Language Access Plan, including:
    - Defining Limited English Proficiency (LEP).
    - Staff responsibilities in providing language assistance.
    - Procedures for accessing interpretation and translation services (e.g., Language Line, in-person interpreters, translated documents).
    - Prohibition of using minor children or unauthorized family members as interpreters.
- **Effective Communication Techniques:** Training on best practices for communicating with LEP individuals, even when an interpreter is present. This includes speaking clearly, avoiding jargon, allowing sufficient time for interpretation, and confirming understanding.

3. Community Engagement and Outreach

Effective outreach ensures that all individuals in our community are aware of and can access our services by conducting the following:

3.1 Multilingual Communication Channels:

- **Advertising Materials:** Translate community events announcements, press releases, and informational brochures into relevant non-English languages. Prioritize documents that inform the public about our department services and how to file a complaint.
- **Social Media:** Utilize multilingual content on social media platforms to reach diverse linguistic communities.

3.2 Community Partnerships:

- **Collaborate with Community Organizations:** Establish and maintain partnerships with local community organizations that serve LEP populations. These partnerships can facilitate the dissemination of information, provide valuable insights into community needs, and assist in outreach efforts.
- **Participate in Community Events:** Actively participate in community events attended by LEP individuals to directly engage, disseminate information, and build trust.

4. Language Access Measures

The Nashville Community Review Board will provide language assistance by:

4.1 Interpretation Services:

- **Telephonic/On Demand Interpretation:** Provide immediate access to qualified telephonic interpretation services (e.g., Lingualinx) for all divisional interactions requiring spoken language assistance. Staff will be trained on how to quickly access and effectively utilize these services.
    - **Lingualinx:** A language service provider that can translate over 300+ languages through over the phone interpretation service, on demand interpretation service, and etc.

4.2 Translation Services:

- **Vital Document Translation:** Identify and translate all vital documents (e.g., consent forms, complaint/commendation forms, public research documents, and essential public information) into the most frequently encountered non-English languages.
- **Document Prioritization:** Prioritize documents such as brochures, flyers, informational sheets, etc. for translation based on their importance, frequency of use, and impact on LEP individuals' access to services.
- **Filing Online Compliant/Commendation:** The NCRB strategically identified a case management system that would offer a wide range of translation services. Our current case management system, Sivil Technologies, offers users the opportunity to fill out an online compliant/commendation form in over 100+ languages.

Conclusion:

The Nashville Community Review Board is committed to ensure our department continues to provide equitable and effective access to all members of our community. We will annually review our Language Access Plan and update as necessary to assess its effectiveness, identify areas for improvement, and incorporate new demographic data or best practices. We are committed to ensuring all services of the NCRB provided to the community are done with integrity, accountability, transparency, and trustworthiness.

NCRB Department Contacts:

Keturah Barnett
Administrative Services Manager/Title VI Coordinator
Keturah.barnett@nashville.gov
401 Church Street, Suite 1300
Nashville, TN 37219

Demica Cash
Community Engagement & Outreach Manager/Language Access Coordinator
demica.cash@nashville.gov
401 Church Street, Suite 1300
Nashville, TN 37219

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: County Clerk Year: 2026

Title VI Coordinator: Andrew Butler Form Completed By: Andrew Butler

Form Completion Date: 5/22/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☐ No **N/A**

If so, how is the training provided?

N/A

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

N/A

☐ We Do Not **N/A**

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☐ No **N/A**

List all locations where the notice is posted:

N/A

Do you provide this in languages other than English?

☐ Yes ☐ No **N/A**

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☐ No **N/A**

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No **N/A**

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other **N/A**

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☐ No **N/A**

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☐ No **N/A**

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
Select N/A a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☐ No **N/A**

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☐ No **N/A**

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☐ No **N/A**

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item
N/A	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Criminal Court Clerk Year: FY2025-26

Title VI Coordinator: Amy Rooker Form Completed By: Amy Rooker

Form Completion Date: 6/4/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Title VI /VII information is documented in the employee handbook. New employees must read the handbook and sign an acknowledgment. Employees are required to complete Diversity and Inclusion training per Metro guidelines which covers the Civil Rights Act of 1964, the seven protected classes, bias, and inclusion. Additionally, new employees are required to review Title VI materials provided by Metro Human Relations and sign an acknowledgement. The training material is found on the Metro Nashville Human Relations Commission website on Nashville.gov.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Title VI information is documented in the employee handbook. It is posted in the employee break room, and in the public lobby in English, Spanish, Arabic, and Chinese. Employees receive electronic Title VI information annually to review that originates from the Metro Human Relations Commission.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Criminal Court Clerk's main lobby in A.A. Birch Courthouse (English, Spanish, Arabic, and Chinese) Also, it is posted in the CCC employee break room.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating, and tracking Title VI complaints?

☐ Yes ☑ No

While there is no written policy for investigating Title VI specifically, we do have a Discrimination Policy that covers Title VII. Complaints received will be thoroughly investigated and will generally follow the Employee Grievance Policy 5.10 procedures. Assistance from the Human Relations Commission would be requested if needed. Our Discrimination Policy is attached.

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☑ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations, and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit, or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary

Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The Office of the Criminal Court Clerk utilizes free interpretation services offered by the Tennessee Language Center through CTAS. They offer in person, over the phone, and document translation services. Use documents are prepared by the Tennessee Language Center and have been distributed to all Criminal Court Clerk staff members.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

CCC Written Policies

2.3 EQUAL EMPLOYMENT OPPORTUNITY

A. Policy

It is the policy of the Criminal Court Clerk that all persons shall have equal employment opportunities regardless of race, color, national origin, gender, age, religion, or disability, gender identity, or sexual orientation. Illegal discrimination against any person in recruitment, examination, appointment, training, promotion, retention, discipline or any other employment practices shall be prohibited. Harassment based on race, gender, color, religion, age, national origin or disability is a form of discrimination and will not be condoned.

The Criminal Court Clerk guidelines and policies shall be administered in such manner as to comply fully with all Equal Employment Opportunity laws and regulations.

B. Complaint Procedure

A complaint of discrimination as outlined in the Guidelines on Discrimination, including a complaint of sexual harassment, may be filed according to the steps defined below. A complaint should be filed within a reasonable time frame of the occurrence or reasonable knowledge of alleged harassment and/or discrimination incident(s). If it is a continuing problem, the complainant needs to state when it began and the progression to the time of the complaint. A complaint may be filed by a current or former employee or by an applicant and by an individual or a group of people. Complainants shall have the right to have reasonable representation of their choosing with them at all stages of the complaint procedure. The complaint procedure will maintain confidentiality to the degree allowed both by law and by the need to conduct a thorough

investigation. Reprisal or retaliation against good faith complainants or witnesses participating in the investigation is prohibited and could be grounds for disciplinary action. An employee who witnesses or otherwise has knowledge of discrimination is encouraged to report the incident to a supervisor or an appropriate authority.

Although employees are encouraged to try to settle problems on an informal basis, employees who feel they have been subjected to discrimination may submit a complaint to their supervisor and or designee. When appropriate, the supervisor shall try, in a timely manner, to remedy any actual or perceived problem without the necessity of additional formal procedures. After reviewing the matter, the supervisor shall promptly inform the employee of his decision. If the complaint cannot or should not be resolved at this level, the employee may submit the complaint to the Criminal Court Clerk or his designee. The Criminal Court Clerk or designee, after a prompt and thorough investigation, will take the necessary steps to correct any problem found to exist, including disciplinary action. The Criminal Court Clerk or designee shall notify the complaining party of his decision following the conclusion of the investigation.

2.4 GUIDELINES ON DISCRIMINATION

Administrators and supervisors in the Criminal Court Clerk Office are familiar with and will comply with all laws, regulations and guidelines governing various forms of discrimination. Specific guidelines are summarized in this document in Appendix V. Furthermore, harassment of any person in the form of verbal or physical conduct based on a person's race, gender, color, religion, national origin or disability, creed, gender identity, or sexual orientation will not be condoned when such conduct:

1. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
2. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. Otherwise adversely affects an individual's opportunities associated with employment.

A5 APPENDIX V

GUIDELINES ON DISCRIMINATION – Title VI and VII

Administrators and supervisors in the Metropolitan Government are familiar with and will comply with all laws, regulations and guidelines governing various forms of discrimination. Specific guidelines are summarized in this document. Furthermore, harassment of any person in the form of verbal or physical conduct based on a person's race, gender, color, religion, national origin or disability, creed, gender identity, or sexual orientation will not be condoned when such conduct:

1. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
2. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. Otherwise adversely affects an individual's opportunities associated with employment.

A. Race Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

It shall be against the policy of the Metropolitan Government to discriminate against an

individual as a result of that person's race. This policy applies to applicants for employment as well as current employees.

B. Sexual Discrimination

It is the policy of the Metropolitan Government that there shall be no discrimination against any individual based on gender. This covers all employment actions and conditions of employment and benefits.

1, Job Policies and Practices (Civil Rights Acts of 1964, Title VII, as amended by the Civil Rights Act of 1991 & Equal Pay Act of 1963)
a. Personnel policies do not discriminate on the basis of gender.
b. Employees and applicants of both genders are equally considered for any positions for which they are qualified.
c. Employment opportunities, wages, hours, conditions of employment and benefits are equally offered to all employees regardless of gender.
d. Marital status shall not be a factor in any employment opportunity or decision.
e. Appropriate physical facilities shall be provided for people of both genders.

2. Maternity Leave (Pregnancy Act of 1978 & Tennessee Maternity Leave Law)
Accrued sick leave shall be granted for the time that a woman is physically unable to work due to childbirth as documented by her physician. Additional vacation and/or leave without pay may be granted in accordance with applicable law. The same vacation and/or leave without pay may be granted as paternity or adoption leave.

3. Sexual Harassment (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991; Guidelines on Discrimination Because of Sex, 1980) The Metropolitan Government prohibits sexual harassment of any employee. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or
b. Submission to or rejection of such conduct is used as the basis for employment decisions affecting such individual, or
c. Such conduct has the purpose of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment can take many forms. It is not limited to overt physical acts. Suggestive comments, jokes of a sexual nature, sexually suggestive objects or pictures, obscene gestures, sexually graphic stories, as well as unwanted touching, may all constitute sexual harassment.

Sexual harassment of any employee will not be tolerated. No employee will be allowed to sexually harass, either verbally or physically, another employee; nor shall any supervisor allow the harassment of any of his/her employees, either by other employees or by persons not employed by Metro Government. It will be the responsibility of managers and supervisors to take all steps necessary to enforce the provisions of this policy. Any complaint of harassment will be promptly investigated and corrective and/or disciplinary action taken if the charges are found to be true.

Action can only be taken when managers and supervisors have knowledge of sexually harassing conduct. Employees have a duty to inform managers and supervisors when they observe or are aware of improper sexual conduct exhibited by a Metropolitan Government employee. This obligation to inform includes improper conduct committed by non-government employees if the conduct is directed toward government employees.

C. Religious Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

The Metropolitan Government expresses its commitment to prohibit religious discrimination against applicants for employment and employees in all areas of employment and benefits. No distinction based on religion shall apply in employment opportunities, wages, hours of work, and other conditions of employment or benefits. Efforts will be made to accommodate the religious observance and practices of an employee unless such accommodation is unreasonable and would result in an undue hardship on the conduct of business.

D. Age Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991 & Age Discrimination in Employment Act of 1967, as amended)

The policy of the Metropolitan Government prohibits age-based discrimination against individuals 40 years of age or older. The Criminal Court Clerk will not refuse to hire, to discharge, or otherwise discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment because of an individual's age. Exceptions:

1. There may be differentials in bona fide employee benefit plans.

2. For some areas of work, age may be a bona fide occupational qualification.

E. National Origin Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

1. Policy

It shall be against the policy of the Metropolitan Government to discriminate because of an individual's or his or her ancestor's place of origin or because an individual has the physical, cultural or linguistic characteristics of a national origin group. Furthermore, it is against the policy to discriminate for reasons which are grounded in national origin, such as (a) marriage or association with persons of a national origin group; (b) membership in, or association with an organization identified with or seeking to promote the interests of national origin groups; (c) attendance or participation in schools, churches, temples or mosques, generally used by persons of a national origin group; and (d) because an individual's name or spouse's name is associated with a national origin group. There shall be no discrimination based on national origin in any area of employment or condition of employment or in the granting of employment benefits.

2. Citizenship

The Criminal Court Clerk requires all employees be United States citizens, legal resident aliens, or aliens authorized to work in the United States. Specified classifications require U.S. citizenship as a bona fide occupational qualification.

F. Disability Discrimination (State and Local Fiscal Assistance Act of 1972 and Rehabilitation Act of 1973: Americans with Disabilities Act of 1990)

1. Policy

It is the policy of the Metropolitan Government to assure equal employment opportunity to disabled persons on the basis of qualifications and ability to perform the job. There shall be no discrimination in terms of employment opportunities, wages, hours of work or other conditions of employment or benefits. An individual with a disability is one who has a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or who is regarded as having such an impairment.

2. Application Process

Disabled persons are guaranteed the same application process as other applicants. Assistance may be provided when needed, such as the following:

a. A reader may be provided for completing an application or written examination for qualified applicants who are vision-impaired or illiterate due to a learning disability.
b. Waiver of a driver's license may be requested for qualified disabled applicants who are not allowed to drive.

3. Reasonable Accommodation

A department shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled individual unless to do so would be an undue hardship. The specific accommodations needed shall be determined jointly by the individual and the Criminal Court Clerk with technical assistance provided by the Department of Human Resources for Metro. Reasonable accommodation may include but shall not be limited to:

a. Making facilities readily accessible to and usable by disabled persons
b. Job restructuring, job sharing or modified work schedule, acquisition or modification of equipment or devices and other similar actions.
c. Assignment to a vacant position for which the person is otherwise qualified

In determining whether an accommodation would impose an undue hardship on the operation.

5.10 EMPLOYEE GRIEVANCES

A grievance is defined as an employee's claim that he has been adversely affected by a violation, misinterpretation, misapplication or non-application of a specific law, ordinance, resolution, executive order, or written policy.

Every employee shall have the right to present his grievance under the provisions of the grievance procedures free from fear, interference, restraint, discrimination, coercion or reprisal.

A. NON-GRIEVABLE MATTERS

While the grievance procedure can be beneficial to an organization, there are boundaries that must be set concerning issues that are not a grievance. These boundaries are set in order to maintain the efficient operation of the Criminal Court Clerk and to prevent the obstruction of its goals and objectives.

The list found below outlines subject areas that are not considered to be a grievance circumstance:

o Changes or request for changes in the approved pay plan or approved benefits.
o The merits of any uniformly applied HR practice, policy or procedure established by laws, or ordinance.
o Reductions in work force.
o Management rights to schedule and organize work, to make work assignments, and to prescribe methods and procedures by which work is performed, unless otherwise provided in these rules.

Complaints alleging discrimination or other violations of applicable EEO laws must be filed as discrimination complaints and will be processed in accordance with the EEO Complaint Procedure.

B. GRIEVANCE PROCEDURE

Written Complaint to Supervisor: The first stage of any grievance consists of the employee's written presentation of his complaint to his immediate supervisor. The supervisor will document the grievance and have the employee sign a simple statement that he is submitting a grievance. The employee may take his complaint to the next supervisor in the chain of command when the complaint concerns some action of the supervisor that the employee feels he is not able to discuss with the supervisor. The supervisor will promptly consider the complaint and determine if the matter is grievable. The supervisor will take appropriate action to resolve the grievance or to deny the grievance. They shall act and/or notify the employee of his decision in writing within seven (7) calendar days.

Any grievance must be filed within sixty (60) calendar days after the event giving rise to the grievance.

Appeal to Criminal Court Clerk: The employee must write a letter to the Criminal Court Clerk stating his complaint. The letter must be received within ten (10) calendar days of receiving the supervisor's decision. If there is no resolution acceptable to both parties the Criminal Court Clerk or designee will attempt to resolve the grievance and will send a letter to the employee within ten (10) calendar days confirming any agreed upon resolution.

A grievance may be settled, in part or in whole, at any time during the grievance procedure. A final decision in a grievance review shall be in writing. A final decision shall include findings of facts and reasons for the ultimate decision. Parties shall be notified in writing either personally or by mail of any decision or order.

Title VI training found on Nashville.gov
https://www.nashville.gov/departments/human-relations/title-vi

https://www.nashville.gov/sites/default/files/2025-10/Title-VI-101-MHRC-FINAL.pdf?ct=1759774099



Metropolitan Government of Nashville

TWENTIETH JUDICIAL DISTRICT

HOWARD C. GENTRY

CRIMINAL COURT CLERK
DAVIDSON COUNTY

JUSTICE A. A. BIRCH BUILDING 408
2ND AVENUE NORTH • SUITE 2120

NASHVILLE, TN 37201

615-862-5601

The Criminal Court Clerk is required to certify compliance with **Title VI of the Civil Rights Act** by informing employees/clients/constituents/applicants of their rights under Title VI of the 1964 Civil Rights Act.

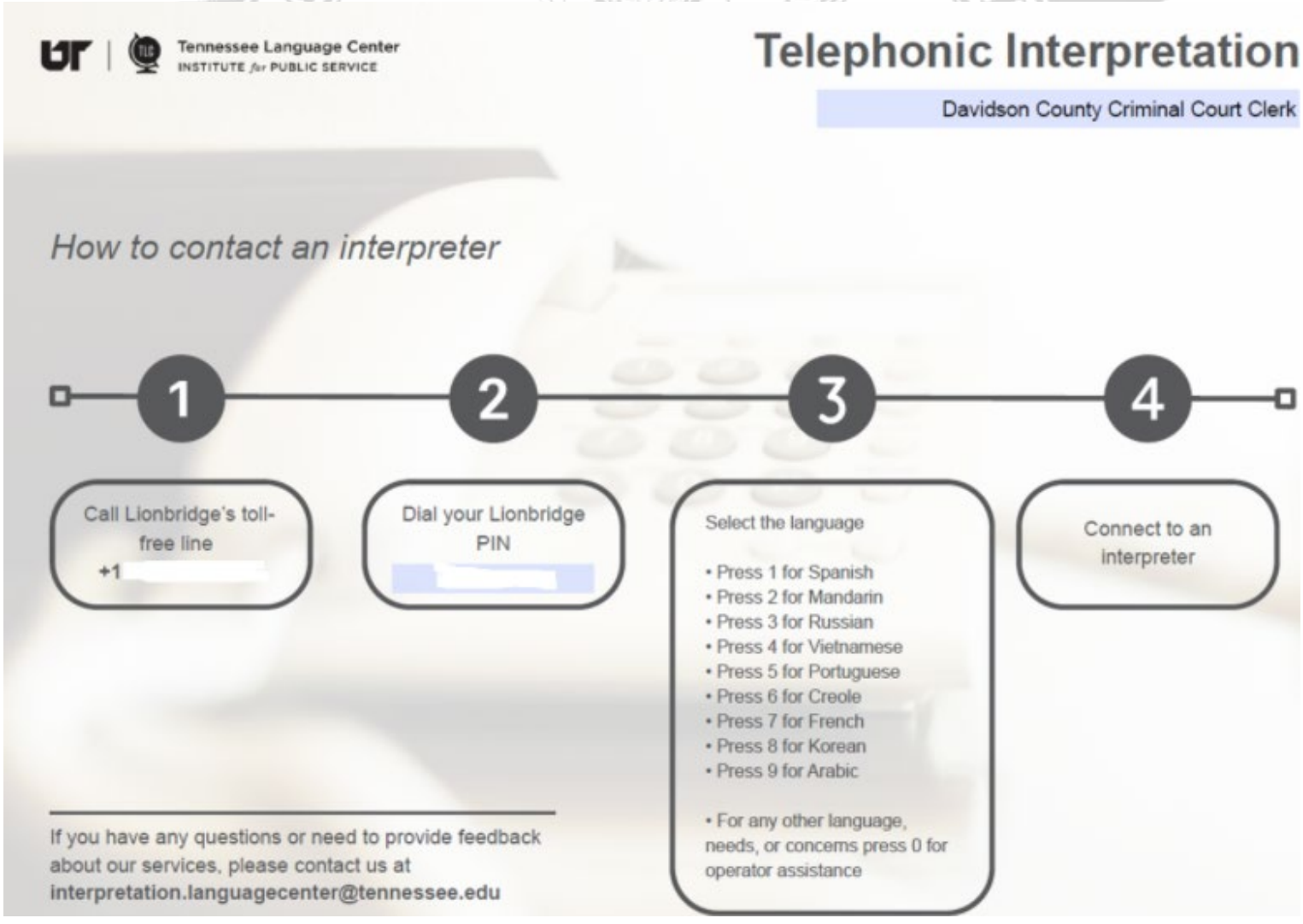
Title VI of the Civil Rights Act states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

By signing below, I acknowledge that I received training regarding the *Title VI of the Civil Rights Act of 1964*. I agree to abide by the principles that were explained in this training. I understand that if I have any questions that were not addressed in training or if I encounter any problems, I can contact my immediate supervisor or the Human Resources Director.

_____ _____

Employee Signature Date

Tennessee Language Center Documents (CCC Account Info Redacted)



Requesting In-Person Interpreters

Step 1: Submit a Request

You can request an in-person interpreter in one of three ways:

- **Online:** Fill out the Interpretation Request Form on TLC's website (tiny.utk.edu/interpreter)
- **Email:** Send your request to [redacted]
- **Phone:** Call us at [redacted]

Please include:

- Date, time, and expected duration of the assignment
- Location (address, building, room number)
- Language needed
- Type of appointment
- Point of contact for coordination

At least **3 business days' notice** is preferred.

Requests with shorter notice will be handled based on interpreter availability.

Step 2: Confirmation

TLC will assign a qualified interpreter and confirm the details with you via email. You will receive:

- Interpreter's name
- Appointment details
- Contact information for questions or last-minute changes

Step 3: After the Appointment

You will receive an invoice based on:

- Interpreter's hourly rate
- Applicable minimums (typically 2 hours)
- Mileage, if outside the standard service area

If the appointment is canceled with less than 24 hours' notice, a cancellation fee may apply.

Requesting Document Translations

Step 1: Submit a Translation Request

Email your request to [redacted] or use the online Translation Request Form [redacted]

Please include:

- The document(s) to be translated (in Word, PDF, or scanned format)
- Target language(s)
- Any specific formatting or certification requirements
- Desired turnaround time

TLC maintains strict confidentiality for all documents.

Step 2: Receive a Quote

TLC will review your request and provide a written quote, including:

- Estimated cost (based on word count, complexity, and formatting)
- Estimated turnaround time

Once you approve the quote, translation begins.

Step 3: Delivery

Completed translations will be sent to you by email in the agreed format. If hard copies or certified documents are required, TLC can provide them by mail (mailing fees apply) or in person.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Criminal Justice Planning Unit Year: 2026

Title VI Coordinator: Samantha Terrell Form Completed By: Samantha Terrell

Form Completion Date: 6/3/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☐ Yes ☑ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Criminal Justice Planning department is a non-civil service department that is not open to the public. However, if language assistance is needed, one can be provided.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Steering Committee and Advisory Board members are selected based on Executive Orders No. 99-005 and No. 021.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Election Commission Year: 2026

Title VI Coordinator: Rick Brown Form Completed By: Rick Brown

Form Completion Date: 7/9/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Metro has a Diversity and Inclusion training class that must be taken by all new employees. All employees take a State Title VI training class annually and the Metro class every 4 years.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. Attached

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other Voters are encouraged to file a written complaint about any issues with voting, which is available to all voters during Early Voting, as well as on Election Day. See form attached.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Election related language access is not permissible unless prescribed by the federal government.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

DAVIDSON COUNTY ELECTION COMMISSION
615-862-8800
615-862-8810 (fax)
TTY-1-800-848-0298 or Relay 711
www.nashville.gov/vote

Election Concerns & Complaints

We want voting to be seamless and efficient. If you experience an issue or have a suggestion to share, please:

- Complete this form OR
- Email **vote.questions@nashville.gov** OR
- Call (615) 862-8800

Please Print

Voter's Name: _____ Phone #:_____

Email Address: _____ Date of Birth: __ __ / __ __ / __ __ __ __

Comments: _____

_____

_____

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_____

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Department of Emergency Communications Year: 2026

Title VI Coordinator: Lynette Dawkins Form Completed By: Lynette Dawkins

Form Completion Date: 7/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

DEC uses language line and that information is provided to all DEC employees in our call taking manual and in our training bulletin that is accessible to all employees via PowerDMS (could-based compliance management platform)

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other The Public will be informed verbally of the complaint procedure

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
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Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Farmer's Market Year: 2026

Title VI Coordinator: David Griffin Form Completed By: David Griffin

Form Completion Date: 5/28/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Provided during onboardings and all new information is provided to employees as received (i.e. language access info.)

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

It is listed in the department handbooks that employees review for operations and communicated to merchants. We also review all of the language options to translate information along with mentioning that Metro has a contract for language services.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Listed in departmental handbooks.

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☑ Other Board agendas and in department handbooks for tenants and vendors.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The department would partner with Metro Human Relations should this need arise on a case by case basis.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Nashville Farmers' Market

Title VI Complaint Procedures

1) All Title VI complaints will go to the Nashville Farmers' Market Executive Director within 180 of the complaint to review and investigate. A written documented report of the facts will be compiled and filed by the Executive Director and recorded in a Complaint log and presented to the NFM Board of Directors.
2) The complaint will be forwarded to the MHRC for investigation.
3) The Nashville Farmers' Market Executive Director will execute the recommendations from the MHRC.
4) All Title VI complaints will be recorded and filed securely in the office of the Executive Director and available for review upon request.
5) Final action on the Title VI complaint will be taken within 60 days of the written complaint.
6) An appeal provision with instructions will be available.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Finance Year: 2026

Title VI Coordinator: Kimberly Northern Form Completed By: Maya Dixson (Backup)

Form Completion Date: 6/11/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

The departments shares its Language Access Plan via email to employees, and has it posted on the department's internal SharePoint site.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No (Have not had any to record)

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No (Have not had any to record)

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. (

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

June 2026

LANGUAGE ACCESS PLAN

METRO FINANCE

01

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Language Access Plan

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02

POLICY STATEMENT

The Metro Finance Department recognizes that language should not be a barrier to accessing financial services, resources, and information. We understand that clear communication is essential for building trust, ensuring transparency, and helping residents navigate financial processes. That's why we are committed to providing meaningful access to our services for individuals with Limited English Proficiency (LEP).

Through our Language Access Plan, we will offer language assistance services, including interpretation and translation, to those who need them. We will also train our staff to communicate effectively with individuals with LEP and continuously review and improve our practices to enhance accessibility.

By prioritizing clear communication and accessibility, we aim to foster a community where all residents can confidently access the services and information they need.

03

DEFINITIONS

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

- **Language Assistance Services** – Oral and written language services needed to assist individuals with LEP to communicate effectively with staff, and to provide them with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by Metro Finance.

- **Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP. For individuals with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

DEFINITIONS (CONT'D.)

- **Multilingual staff or employee** – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language.

- **Qualified Translator or Interpreter** – An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate.

- **Sight Translation** – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

- **Translation** – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

- **Vital Document –** Paper or electronic written material that contains information that is critical for accessing a component's program or activities or is required by law.

05

LANGUAGE NEEDS ASSESSMENT

The decision to provide language assistance services should include an assessment of the number or proportion of individuals with LEP from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of individuals with LEP served or encountered, the more likely language services are needed.

Generally, identifying any community where the LEP population equals 5 percent or more in a given language automatically triggers providing language assistance services as a mandatory and normal part of the program operation.

In determining “reasonable steps” to ensure meaningful access to information and services, there are four factors to be considered.

06

FOUR FACTORS:

Factor 1: The number or proportion of LEP individuals in the organization's service area.

According to Census Data for the year 2022, Davidson County had a total of 663,264 inhabitants. Out of this number, 60,743 (%10.08) spoke English "less than very well" and are therefore considered LEP (Limited English Proficient).

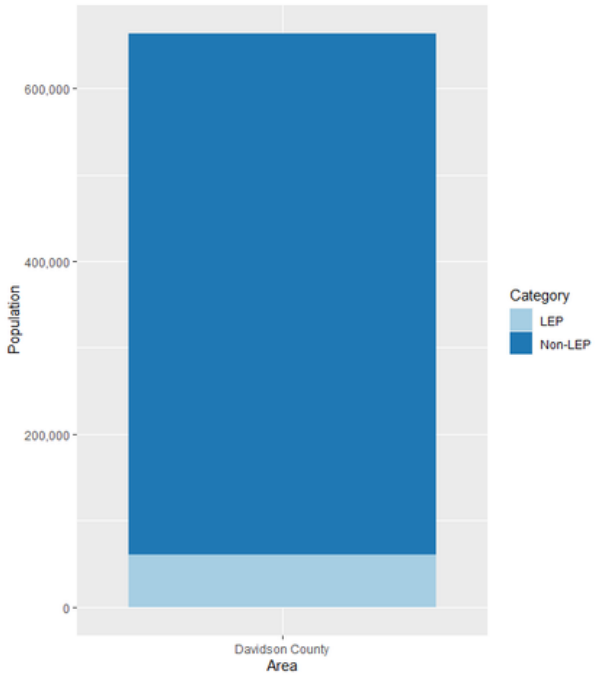


Figure 1: LEP Population in Davidson County

Source: U.S. Census Bureau. (2022). Detailed Household Language by Household Limited English-Speaking Status. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B16002.

Factor 1: The number or proportion of LEP individuals in the organization's service area. (cont'd.)

Regarding the languages spoken by these LEP populations, these are the ones which are the most commonly spoken in Davidson County, according to Census Data:

Language	Nr. Of Households
Spanish	9696
Arabic	1169
Other and unspecified languages	1049
Tagalog (incl. Filipino)	717
Chinese (incl. Mandarin, Cantonese)	704
Other Indo-European languages	638
Other Asian and Pacific Island languages	594
Korean	130
Vietnamese	93

Table 1: LEP Households by Language Spoken at Home

Source: U.S. Census Bureau. (2022). Detailed Household Language by Household Limited English-Speaking Status. American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B16002.

Factor 1: The number or proportion of LEP individuals in the organization's service area. (cont'd.)



Figure 2: Languages other than English spoken by LEP individuals in Davidson County

Source: U.S. Census Bureau. (2022). Detailed Household Language by Household Limited English Speaking Status. American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B16002.

Many languages are grouped within very diffuse geographical areas, but their components can be estimated by comparing these data points with the ones provided by census table B05006: Place of Birth for the Foreign-Born Population in the United States (See Table 2).

Using this supplementary data, a more detailed list can be generated. It should be noted that these data are only provisional, and their accuracy is not as high as if we had actual detailed language data.

Factor 1: The number or proportion of LEP individuals in the organization's service area. (cont'd.)

Country of Origin	Population
Egypt	6813
Iraq	4769
Ethiopia	2887
India	2866
China	2864
Korea	1906
Burma	1549
Vietnam	1468
Philippines	1452
Nigeria	1407
DRC	1315
Somalia	1277
Afghanistan	1091

Table 2: Place of Birth for Foreign-Born Population in Davidson County

Source: U.S. Census Bureau. (2022). Place of Birth for the Foreign-Born Population in the United States American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B05006.

List of languages other than English spoken in Davidson County:

- Spanish
- Arabic
- Tagalog
- Chinese
- Other Indo-European: Hindi, Kurdish
- Other Asian and Pacific: Burmese
- Korean
- Vietnamese
- Other and unspecified: Swahili, Somali

FOUR FACTORS:

Factor 2: The frequency individuals with LEP come in contact with the program.

Most areas of Metro Finance have limited or infrequent interaction with individuals with LEP. The primary exception is the Office of Impact, which consistently engages with LEP communities through resource guides, social media campaigns, and other outreach efforts. Their most commonly targeted languages include Spanish, Kurdish, Arabic, Somali, and Nepali.

Metro Finance has a combined social media following of over 1,000 across Twitter and Facebook. However, the number of followers who are LEP is currently unknown. Translated posts from the department have been shared by Council members and other Metro departments, extending the reach beyond the department's direct audience.

The office supports nearly all Metro Government departments, currently working with over 50. On average, they engage five departments per quarter in their initiatives, which include an educational curriculum and providing recommendations for areas of opportunity identified during that work. The office also collaborates with community leaders, business owners, and representatives from external government agencies, who help spread information to their communities and constituents.

While the office directly serves an estimated 70-100 individuals per month (excluding social media interactions), the number of individuals with LEP reached through these efforts is not currently available.

FOUR FACTORS:

Factor 3: The nature and importance of the program, activity, or service provided to individuals with LEP.

Access to information about the programs, services, and data provided by Metro Finance is vital for all Nashvillians, as it promotes transparency, accountability, and financial literacy across the community. Clear information on budgets, public spending, tax policies, and available resources helps residents understand how public funds are allocated, enabling them to make informed decisions and participate in civic life.

When the public has access to this data, trust in government operations can grow, fostering a collaborative relationship that ultimately benefits the city's progress and wellbeing.

For individuals with LEP, having access to this information in their preferred language is especially crucial. Language barriers can prevent individuals with LEP from fully understanding financial programs and services, limiting their ability to take advantage of essential resources like tourism tax assistance, bidding opportunities for city projects, and other public benefits

Providing information in multiple languages empowers residents with LEP to do business with the city, remain informed about the city's financial decisions, and engage meaningfully in city discussions that impact them directly

FOUR FACTORS:

Factor 4: Determine the resources available to assist individuals with LEP.

During Fiscal Year 2024, Metro Finance received language services through a pilot program developed by the Tennessee Language Center (TLC) in partnership with the Metro Human Relations Commission. Some examples of texts that were translated by TLC include the following:

1. Surveys and Reports
2. Blog Posts
3. Social Media Posts and Graphics

Metro Finance can still request translation services through the Tennessee Language Center on a case-by-case basis.

LANGUAGE ASSSISTANCE PROCEDURES

INTERPRETATION

1. **Determine if language assistance is needed:**
   - Language assistance services will be provided to any individual that requests it, or if a staff member is unable to communicate in English with an individual. Staff members will notify all individuals that they have a right to an interpreter at no cost.
2. **Identify the LEP's primary language:**
   - If a staff member cannot determine the primary language spoken by an individual, they can use the language identification flashcards (page 20) or call the telephonic interpretation service and ask them to determine the language.
3. **Contact a telephonic interpreter:**
   - If the individual with LEP is present with you, you can use the speaker function of your phone so the interpreter can hear both of you. If he or she is reaching out to you over the phone, place the caller on hold.

   NOTE: ***If an interpreter cannot be secured, go to page 60***

4. **Dial the number corresponding to your preferred telephonic interpretation provider.**
   - If required by your telephonic interpretation provider, enter your client ID and/or PIN number.
5. **Brief the interpreter on the nature and goals of the call.**
   - If the individual with LEP is on hold, add them to the call.

LANGUAGE ASSSISTANCE PROCEDURES

TRANSLATION

1. **Select a Language Service Provider (LSP):**
   - A list of available providers is included in this document (page 15). Consider factors such as the provider's experience, expertise, customer reviews, and pricing structure.
2. **Request a Quote:**
   - Once you've selected an LSP, provide them with the document(s) to be translated. Ensure that the document is in an editable format, and clearly communicate any specific instructions or preferences to the LSP.
3. **Review the Terms and Timeline:**
   - Review the LSP's terms and conditions, including pricing, payment terms, confidentiality agreements, and turnaround time. Clarify any questions or concerns before proceeding with the translation project.
4. **Collaborate with the LSP:**
   - Address any questions or issues that arise during the translation process with the LSP. Provide context, reference materials, and feedback as needed to ensure accuracy and quality (see page 56).
5. **Delivery:**
   - Arrange for delivery in the desired format. Confirm receipt and ensure that the translated document meets your expectations.

NOTE: For procedures on translating brief messages (emails, texts), refer to page 62.

LANGUAGE SERVICE PROVIDERS

All LSPs listed here offer the following services:

- **Interpreting:**
  In-Person, Phone, Video
- **Written Translation**

Language Line Services
Contact Name: Joe Matthews (jmatthews@languageline.com)
Phone Number: 831-648-1740

- Multilingual Closed Captioning Services
- Over-the-Phone Interpretation (OPI);
- Face-to-Face/In-Person Interpretation;
- Document Translation;
- American Sign Language

Lingualinx
Contact Name: Becca Anderson (BAnderson@lingualinx.com)
Phone Number: 518-288-5100 ext. 1074

- Over-the-Phone Interpretation (OPI);
- Face-to-Face/In-Person Interpretation;
- Document Translation;
- American Sign Language

Idea Language Services
Contact Name: Sergio Atrisan (sergio@ideatranslations.com)
Phone Number: 860-781-6377

- Written/Document Translation Services

Ad Astra, Inc
Contact Name: Emily Layher (Emilylayher@ad-astraininc.com)
Phone Number: 301-408-4242 ext. 145

- Telephonic Interpretation & Translation Services

Lionbridge Global Solutions
Contact Name: John Drugan (John.Drugan@Lionbridge.com)
Phone Number: 978-964-9550

- Telephonic Interpretation & Translation Services

Bridges for the Deaf & Hard of Hearing
Contact Name: J.Eric Workman (eric@bridgesfordeafandhh.org)
Phone Number: 615-248-8828

- Sign Language Interpretation

TRAINING MEASURES

The department will make the Language Access Plan available to all staff members. A designated staff member will be assigned to oversee the plan's implementation and to conduct any necessary staff training.

LEP training will address the following topics:

a. Language Access Plan and Procedures
b. Effective strategies for responding to individuals with LEP
c. How to obtain and utilize interpreters (both in-person and by phone)
d. Procedures for translating documents

COMPLAINT PROCEDURES

Metro Finance is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in any of our programs or activities on the basis of race, color, national origin (including language), or other protected characteristics under Title VI of the Civil Rights Act of 1964.

Any person who thinks there has been discriminatory action against him/her because of LEP should contact a member of our HR staff.

NOTICE OF LANGUAGE ASSISTANCE SERVICES

Metro Finance offers language assistance services free of charge.

If you speak a language other than English, we provide language interpreters to assist you during interactions with our staff. Additionally, essential information and documents may be translated into your preferred language upon request.

AVISO DE SERVICIOS DE ASISTENCIA LINGÜISTICA (SPANISH)

El Departamento de Finanzas de Metro ofrece asistencia lingüística de forma gratuita.

Si usted habla un idioma que no sea el inglés, nosotros le proveeremos intérpretes para que le ayuden a comunicarse con nuestro personal. Adicionalmente, es posible que podamos traducir información y documentos esenciales a su idioma si usted lo solicita.

ANNEXES

Language Access Cards 20

Working with Interpreters (General) 22

Working with Telephonic Interpreters 29

Connecting with Nashville's Communities 35

Designing Written Materials 48

Preparing Materials for Translation 56

Procedures when language assistance is not immediately available 60

Translating Brief Written Communications (E-Mail, Text Messaging) 62

I speak...

Language Identification Card

أنا أتحدث العربية	Arabic
አማርኛ እናገራለሁ።	Amharic
ကျွန်တော်မြန်မာစကားပြောသည်။	Burmese
我说汉语	Chinese (Mandarin)
من فارسی صحبت می کنم	Farsi/Persian
હું ગુજરાતી બોલું છું	Gujarati
Mwen pale Kreyòl	Haitian Creole
मैं हिंदी बोलते हैं	Hindi
Nvuga ikinyarwanda	Kinyarwanda
나는 한국말을 해요	Korean
من به‌کوردی قسه ده‌که‌م	Kurdish
म नेपाली बोल्छु	Nepali
Я говорю по-русски	Russian
Waxaan ku hadlaa Somali	Somali
Yo hablo español	Spanish
Ninasema Kiswahili	Swahili
Marunong po akong magsalita ng Tagalog.	Tagalog
ฉันพูดภาษาไทย	Thai
میں اردو بولتا ہوں۔	Urdu
Tôi nói tiếng Việt	Vietnamese

I speak...

Language Identification Card

Languages of Guatemala

Quin chagüic´ká chábal´ruin´rí tzújon cakchiquel — **Kakchikel**

Ayin tí chí walq´anjob´al — **Q'anjob'al**

In kinch'awk'uin ch'e quiche — **K'iche**

Bán chiyola tuj kíyol mam — **Mam**

The Maya Interpreters and Translation Agency offers telephonic interpreters at

1-855-MAYA-USA

To ask someone if they speak a particular Maya language, say "¿Habla...?" followed by the language name. For example, if you want to ask if someone speaks Q'eqchi', you would say "¿Habla Q'eqchi'?" (pronounced ¿Habla kehk-CHEE?). Use the pronunciation guide to say the language names as accurately as possible.

¿Habla...	Achi?	ah-CHEE
¿Do you Speak...	Akateko?	ah-kah-TEH-ko
	Awateko?	ah-wah-TEH-ko
	Chuj?	chooch (rhymes with "pooch")
	Ixil?	ee-SHEEL
	Kakchikel?	kahk-chee-KEL
	K'iche?	kee-CHEH
	Mam?	mahm (like "mom")
	PocoMam?	poh-koh-MAHM
	Q'eqchi?	kehk-CHEE
	Q'anjob'al?	kahn-ho-BAHL

WORKING WITH INTERPRETERS

Professional interpreters are vital in bridging the communication gap between public organizations and non-English speaking individuals, ensuring that everyone receives meaningful access to services.

In the following pages, we provide some guidelines on how to work effectively with interpreters to enhance communication and build trust within your community. By selecting qualified interpreters, preparing for interpreted interactions, and fostering an environment of mutual respect, public service providers can ensure that their messages are accurately conveyed.

BEFORE THE INTERPRETATION

1. Figure out the target language and dialect:

It's important to not only identify the language but also the specific dialect of the person you're talking to. This way, you can catch all the regional variations and nuances.

One easy method is to use a **language identification card** (pages 20-21), where individuals can point to their language from a list. Or, you can have a **telephonic interpreting provider** help figure out the right language and dialect through a quick chat.



A NOTE ON INDIGENOUS LANGUAGES

In Davidson County, many people from Guatemala and Mexico speak various **Maya languages**, which are not mutually intelligible with Spanish. In fact, Spanish is linguistically closer to English, German, and Kurdish than to any of the Maya languages! This significant difference means that staff should not rely on Spanish interpreters for Maya-speaking clients.

BEFORE THE INTERPRETATION

2. Select a qualified interpreter:

When choosing an interpreter, make sure they're trained and have plenty of experience. You want someone who can accurately interpret not just the words, but also the tone and feel of the conversation, without any bias. This way, you can be confident that everyone involved will be able to communicate clearly.



AVOID USING RELATIVES OR FRIENDS AS INTERPRETERS

Using someone close to the individual can lead to all sorts of problems. For one, they might not translate everything accurately because they lack the proper training. Plus, there's a big risk of breaching confidentiality. Family members or friends might unintentionally leave out important details or even change the message to protect the person they're interpreting for. And let's be honest, it's not fair to put minors in that position at all.

It's always best to rely on a professional interpreter who knows how to handle these situations properly and keep everything confidential.

BEFORE THE INTERPRETATION

3. Brief the interpreter on the purpose of the conversation:

Take a moment to let the interpreter know what the conversation is about and what you're hoping to accomplish. A little context goes a long way: it helps them anticipate the flow of the discussion and provide more accurate interpretations.

4. Share relevant materials with the interpreter:

If you have notes, outlines, or handouts, share them with the interpreter ahead of time. The more they understand the background and key points, the better they can convey the message accurately and smoothly.

5. Record the interpreter's details:

Keep a record of the interpreter's name and contact information. This can be useful for follow-up questions or future reference.



INTERPRETED CONVERSATIONS TAKE TWICE AS LONG!

Interpreted conversations take longer because everything needs to be said twice: once in each language.

Plan accordingly so that neither party feels rushed!

DURING THE INTERPRETATION

1. Speak directly to the person, not the interpreter:

It's important to maintain direct communication with the person you're addressing. This approach helps build rapport and makes the conversation feel more personal and engaging. Instead of speaking through someone else, try to connect directly.

For example, instead of saying, "Tell him my name is Jane," you should say, "Hello, my name is Jane."

This small change can make a big difference in how your message is received and how comfortable the other person feels during the interaction.

2. Manage your rate of speech:

When speaking through an interpreter, it's a good idea to **use short sentences** and **speak slowly**. This approach makes it easier for the interpreter to accurately render what you're saying without missing any details.

By keeping your sentences concise and your pace steady, you help ensure that the conversation flows smoothly and that nothing important gets lost in translation.

DURING THE INTERPRETATION

3. Use plain language:

When communicating, it's important to use plain language and clarify any technical terms.

Simplify complex terms or take the time to **explain them thoroughly** to make sure everyone understands correctly.

AVOID IDIOMS, ACRONYMS, AND DOUBLE NEGATIVES

When communicating, try to avoid idioms, acronyms, and double negatives.



- **Idioms:** Instead of saying "It's a piece of cake", you could simply say "It's easy."
- **Acronyms:** Instead of using an acronym like "ASAP" (as soon as possible), you could say "as soon as possible."
- **Double Negatives:** Instead of saying "I don't have no time," which can be confusing, you could say "I don't have any time."

These can be confusing and might not translate well into another language. Instead, use straightforward language to ensure your message is clear and easily understood.

AFTER THE INTERPRETATION

1. Thank Both Parties

Don't forget to thank both the interpreter and the person you were talking to. Showing appreciation helps build good relationships and creates a respectful environment.

You might say something like, "Thanks for your help," to the interpreter and, "Thanks for your time and patience," to the individual. A little gratitude goes a long way in making everyone feel valued.

2. Provide Feedback on Interpretation Quality

If you found that the interpreter's performance was not up to standard, such as:

- frequent clarifications,
- excessive use of English terms,
- extreme hesitation, or
- interpretations that are much longer or shorter than your original statements,

it's important to reach out to the interpretation provider and provide feedback. Constructive feedback can lead to improvements in service quality and better communication experiences moving forward.

WORKING WITH TELEPHONIC INTERPRETERS



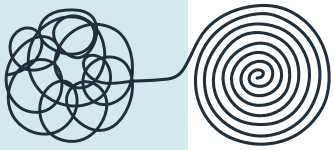
1. Pre-Session Briefing

- **Obstacle:** Telephonic interpreters often start sessions without any heads-up about the context, making it tough to interpret accurately. Interpreters might not have all the background info they need, especially if there's a history they're not aware of.
- **Mitigation:** Share any relevant background info with the interpreter before you get started. This includes past interactions and any details that might be important. Let them know what the conversation is about, your goals, and any potential tricky spots.
- **Example:** Give the interpreter a rundown of the topics and any specific concerns that might come up in a particular interaction with a person with LEP. Also let the interpreter know about previous discussions and ongoing issues.



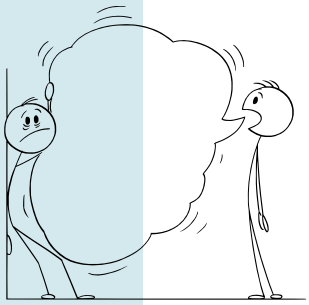
2. Address Sound Quality Issues

- **Obstacle:** Bad sound quality from background noise, speakerphones, or other factors can make it hard for interpreters to hear clearly.
- **Mitigation:** Make sure the sound quality is good by reducing background noise and avoiding speakerphones. If possible, use headsets or find a quieter spot.
- **Example:** During a call in a busy office, move to a quieter area if you can and use a headset instead of a speakerphone.



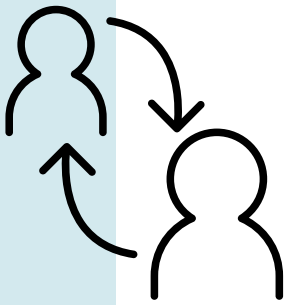
3. Preserving Clarity

- **Obstacle:** Addressing the interpreter instead of the person you're communicating with can create confusion and reduce clarity.
- **Mitigation:** Speak directly to the person you're addressing as if they understand your language; the interpreter will relay your message using the same grammatical person.
- **Example:** Say "How are you today?" directly to the person instead of "Interpreter, ask them how they are today."



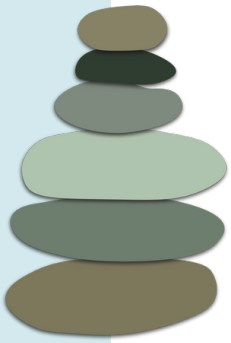
4. Flow of Interpreting

- **Obstacle:** Interpreters need to render messages accurately without filtering or changing anything, but long-winded or unclear speech can make this difficult.
- **Mitigation:** Speak in short, clear sentences and indicate when you've finished your message so the interpreter can start interpreting. Avoid interrupting them with additional information while they're interpreting.
- **Example:** Instead of giving long explanations without pausing, break your message into smaller segments like "First we'll discuss this topic," then pause so the interpreter can translate.



5. Manage Turn-Taking

- **Obstacle:** When talking on the phone, people may talk over each other, which can make it hard for interpreters to keep up.
- **Mitigation:** Make sure everyone takes turns speaking one at a time. This helps the interpreter follow along better and reduces confusion.
- **Example:** In a telephonic conversation with multiple participants, set ground rules at the start by asking everyone to speak one at a time and wait their turn.



6. Be Patient and Supportive

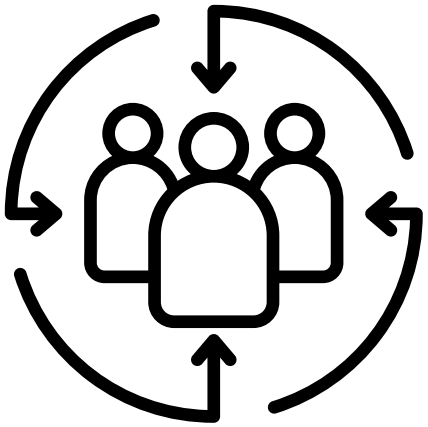
- **Obstacle:** Interpreters might need to interrupt or ask for repetitions due to poor sound quality or lack of visual cues.
- **Mitigation:** Understand that these interruptions are necessary for accurate interpretation. Be patient and supportive of their efforts: they're working under challenging conditions.
- **Example:** If an interpreter asks you to repeat yourself because they couldn't hear clearly over background noise, respond calmly and repeat your statement without frustration.

CONNECTING WITH NASHVILLE'S COMMUNITIES

People from different cultures and backgrounds often run into specific challenges when trying to access services or get involved in civic life. That's why it's important to figure out ways to make those connections easier.

This section will cover the main points about communicating effectively with multicultural communities, highlighting the challenges and strategies that can help.

DEFINITIONS



- **Engagement:** This means getting people involved in ways that go beyond just individual actions, especially by including the government and other organizations in helping build stronger, more connected communities.

- **Communities:** These are groups tied to a specific area, with their own decision-making power. They manage resources and set rules so people can share public goods, compete for resources, and follow similar policies. A community can be made up of individuals, different ethnic groups, or organizations.



UNDERSTANDING CULTURAL VALUES AND FAMILY DYNAMICS

Understanding Cultural Values and Family Dynamics Family and community play a vital role in many cultures, shaping how people interact, make decisions, and engage with city services. Being aware of these dynamics can help city departments build stronger relationships with residents and improve service accessibility.

Hispanic Communities

- *Familia* extends beyond immediate family to include grandparents, aunts, uncles, and close family friends.
- Strong support networks mean that family needs often take priority over individual concerns.
- Decisions about healthcare, education, and employment are typically made as a group, with input from multiple family members.

Arabic-Speaking Communities

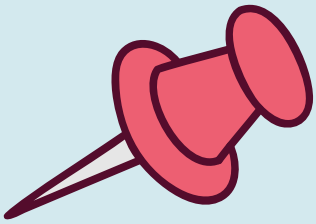
- Family honor and collective decision-making are central values.
- Elders are highly respected, and major decisions—especially about healthcare and education—often involve the whole family.
- Community ties are strong, and many seek guidance from religious or community leaders when making important choices.



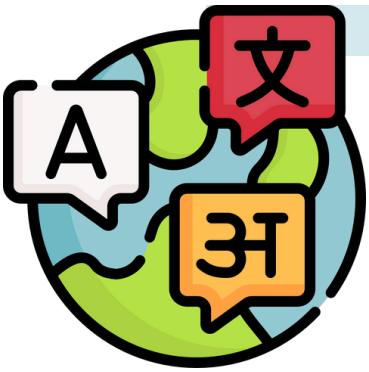
UNDERSTANDING CULTURAL VALUES AND FAMILY DYNAMICS (CONT'D.)

Asian Communities

- Many Asian cultures emphasize filial piety, meaning deep respect for elders and family hierarchy.
- Collectivism is a key value, with decisions often made based on what's best for the family or community rather than the individual.
- Cultural associations, places of worship, and community groups provide important support networks.



Cultures are not monolithic, and while these general insights highlight common values, they do not apply to every individual or family. People's experiences, beliefs, and preferences are shaped by many factors, including personal background, education, and life circumstances. It's important to approach each interaction with an open mind, recognizing that cultural norms can vary widely even within the same community.



LANGUAGE AND ETIQUETTE

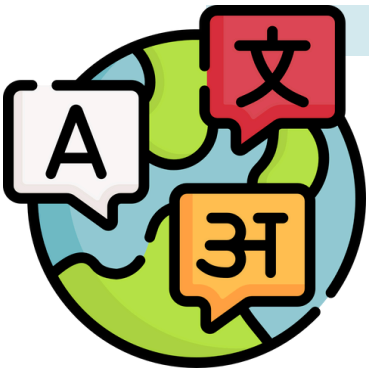
Cultural differences in language and etiquette can shape how people communicate and interact. Being aware of these nuances can help prevent misunderstandings and build stronger connections with residents.

Formality and Respect

- Many cultures value formality in greetings and interactions.
- In Arabic and Hispanic cultures, people often use respectful titles and honorifics when introducing themselves.
- In many Asian cultures, a slight bow or nod is a common sign of respect, and direct eye contact can sometimes feel too intense or confrontational.

Personal Space and Gestures

- In Arabic and Hispanic cultures, people may be more comfortable with close personal space and physical touch, like handshakes, hugs, or even cheek kisses in informal settings.
- Many Asian cultures tend to prefer more physical distance and less contact, especially with strangers.
- Hand gestures can have different meanings across cultures—what's friendly in one place might be offensive in another.



LANGUAGE AND ETIQUETTE (CONT'D.)

Tone and Volume

- Spanish speakers often have lively, expressive conversations, while some Asian cultures lean toward a quieter, more indirect way of communicating.
- Arabic speakers may use a passionate tone that might sound intense but usually reflects sincerity and engagement.



TIME PERCEPTION AND PUNCTUALITY

Attitudes toward time vary across cultures and can affect participation in programs and events.

- Hispanic and Arabic cultures often have a more flexible approach to punctuality, valuing relationships over rigid schedules.
- Many Asian cultures emphasize punctuality as a sign of respect.
- Be mindful of different cultural expectations regarding time and follow up with reminders. Allow for flexibility while also communicating expectations clearly.

BARRIERS TO ENGAGEMENT

- **Linguistic Diversity and Complexity:** Communities aren't always one-size-fits-all. They can speak many different languages or dialects, sometimes even within the same group. For example, within the Asian-American community, Mandarin, Cantonese, Vietnamese, and Tagalog speakers have very different needs. If you just translate materials into one language, you're likely to miss a whole group of people. It's important to figure out which languages matter most and make sure the translations are spot-on.

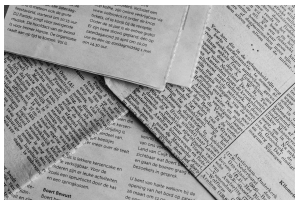
- **Cultural Barriers and Miscommunication:** Culture goes way beyond language. Every community has its own values, norms, and ways of communicating, which affect how messages are understood. The tone of a message or the images you use can make a big difference in how it's received. Some cultures may prefer a direct approach, while others may find it too harsh. Not paying attention to these things can lead to misunderstandings and a lack of engagement.

BARRIERS TO ENGAGEMENT (CONT'D.)

- **Distrust of Institutions:** Many immigrants and refugees, in particular, have had bad experiences with their governments or big institutions in the past. These experiences often make them distrustful of organizations seen as part of the system. To build trust, it takes time, openness, and working with community members who are trusted.

- **Reaching Disconnected Populations:** Some groups within multicultural communities might be hard to reach because they're physically isolated or don't have access to traditional communication channels. To reach them, you might need to get creative—partnering with local community groups, using ethnic radio stations, or tapping into social media platforms that those groups use.

SUGGESTIONS FOR ENGAGEMENT



Utilize Ethnic Media Outlets

To effectively reach LEP populations, it's important to connect with the media sources they already rely on. Community newspapers, radio stations, and podcasts in their native language can be powerful ways to share information. You'll often find these publications in local grocery stores, religious buildings, and cultural centers, making them a great place to start when doing outreach.



Build Personal Relationships

Building trust is key to connecting with immigrant communities, and personal connections can make a big difference. Taking the time for one-on-one conversations, visiting community spaces, and really listening to their concerns helps break down barriers. Showing up consistently and demonstrating genuine care builds lasting relationships that make outreach more effective.

SUGGESTIONS FOR ENGAGEMENT (CONT'D.)



Partner with Trusted Organizations
Working with local cultural groups, service providers, and community leaders is essential for reaching LEP populations. These organizations already have strong connections within their communities and can help share information in ways that are both linguistically and culturally appropriate. Keeping an up-to-date list of trusted partners and staying engaged with them ensures outreach efforts remain effective in the long run.



Engage at Cultural Events
Going to festivals, cultural celebrations, and community events is a great way to connect with LEP populations in a relaxed, welcoming environment. These gatherings offer a chance to have real conversations, share helpful resources, and build relationships.



HOSTING MULTICULTURAL EVENTS

Good communication can make or break a public meeting. Simple tweaks—like slowing down when you talk, using visuals, and making sure everyone's on the same page—go a long way. Here are some easy ways to get your message across clearly.

- **Make meetings easy to attend** by holding them in neighborhoods where people live, near public transportation, or offering transportation help if possible.
- **Make meetings welcoming and enjoyable** by providing childcare, culturally appropriate food, refreshments, and even entertainment.
- **Be mindful of group dynamics—**social roles and relationships can affect how comfortable people feel speaking up. Small group discussions often work best.
- **Start with a formal tone until you build a connection with the group.** Some cultures see casual communication right away as disrespectful.



HOSTING MULTICULTURAL EVENTS

- **Speak slowly and pause** to give non-English speakers time to process and understand what you're saying.
- **Check for understanding** by summarizing key points instead of assuming everyone got it. Rephrasing things in different ways can help.
- **Use multiple ways to communicate**—pair spoken discussions with written materials, slides, or visuals to make sure your message is clear to everyone.

DESIGNING WRITTEN MATERIALS FOR INDIVIDUALS WITH LEP

Here are some tips to help you use plain language and make your documents easier to understand. By sticking to simple words, keeping sentences short, and organizing your information clearly, you can make sure your message comes across to everyone, especially those with limited English proficiency.

These approaches will also make life easier for translators, helping them provide more accurate translations so your communication reaches a wider audience.

USING PLAIN LANGUAGE

ADAPTED FROM THE FEDERAL PLAIN LANGUAGE GUIDELINES, MARCH 2011, REV. 1, MAY 2011



1. Identify and Write for your Audience

When creating materials for individuals with LEP, it's crucial to capture their attention and ensure your message is clear and relevant. **People want information that directly applies to their needs and circumstances.** To engage and maintain their interest, you need to understand who they are and what they need to know.

Guiding Questions:

- Who is my audience?
- What does my audience already know about the subject?
- What does my audience need to know?
- What questions will my audience have?
- What's the best outcome for my organization?
- What's the best outcome for our audience?

If possible, ask someone from the same language community to review the original material and provide feedback. This can help ensure that your message is clear, culturally appropriate, and effectively meets the needs of your audience.

USING PLAIN LANGUAGE



2. Use lots of useful headings

Even a well-organized document can be hard to follow if the structure is not clear. One of the best ways to make a document easier to understand is by using helpful headings.

There are **three main types of headings**:

- Question Heading
  - A heading that is written as a question.
- Statement Heading
  - A heading that includes a noun and a verb to give clear meaning.
- Topic Heading
  - A short word or phrase that names a section.



Question Headings are the most useful, especially for people with LEP, as readers approach documents with specific questions in mind. Using these questions as headings helps them quickly find answers. Statement Headings are also effective because they clearly highlight key points. Topic Headings are more formal but can be too vague and sometimes confusing.

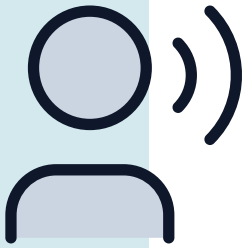
USING PLAIN LANGUAGE



3. Write short sections

Short sections make documents easier to read and translate. Long, dense sections can be overwhelming and harder to process, increasing the risk of misinterpretation.

Breaking text into shorter sections allows translators to work more accurately and ensures that LEP readers can navigate the document more easily.



4. Use the active voice

Using active voice makes documents clearer by specifying who is responsible for an action.

For translators, passive voice can be problematic when working with languages where it is less common or cumbersome. Some languages require restructuring a sentence entirely to convey the same meaning, which increases the risk of mistranslation or awkward phrasing. By using active voice, documents become easier to translate accurately and ensure that individuals with LEP fully understand the intended message without ambiguity.

USING PLAIN LANGUAGE



4. Speak directly to readers

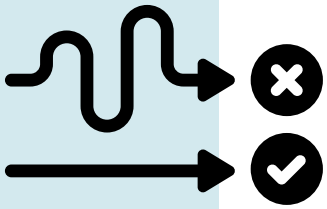
Addressing readers directly makes your documents feel more personal and easier for everyone to understand.

When you say “you,” it’s clear who’s responsible for what, and it helps the reader relate to the text more directly. For translators, it makes things easier because it’s simpler to translate and avoids confusion.

This style also helps organize information better, so you can give clear instructions and answer questions in a way that makes sense to both translators and readers.

Example:
Instead of saying, “Copies of tax returns must be provided,” you could say, “You must provide copies of your tax returns.”

USING PLAIN LANGUAGE



5. Use simple words

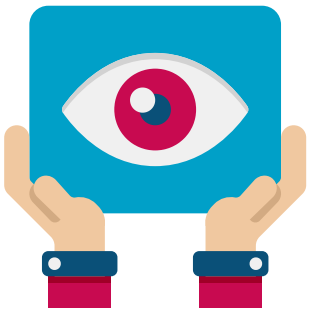
When writing, it's important to use short, simple words. It's great to be expressive, but government writing isn't the place for fancy language or long-winded explanations. People aren't picking up a regulation to enjoy a relaxing read, so keep it straightforward.

H.W. Fowler, in his book The King's English, gave some solid advice for clear writing:

- Prefer the familiar word to the far-fetched.
- Prefer the concrete word to the abstraction.
- Prefer the single word to the circumlocution.
- Prefer the short word to the long.

This approach not only helps readers understand the content more easily but also makes life easier for translators. By using simple and direct language, translators can provide clearer translations that are easier for readers with LEP to follow.

USING VISUAL AIDS



Visual aids—like pictures, diagrams, charts, and symbols—are powerful tools for making information more accessible. They can simplify complex ideas, reinforce key points, and help bridge language gaps. When giving instructions or explaining concepts, a well-placed image or icon can provide helpful context that makes the message clearer.

While visual aids benefit all audiences, they are especially useful for individuals with limited English proficiency (LEP). People from high-context cultures, where communication relies heavily on nonverbal cues, may be more accustomed to visual elements in written materials. In contrast, individuals from low-context cultures might be more reliant on direct verbal explanations.

Because of these differences, visuals should be carefully selected to ensure they are truly helpful rather than confusing.



Whenever possible, use images, graphics, and visual aids that represent the ethnicities and cultures of the communities you serve.

USING VISUAL AIDS (CONT'D.)

Multimedia resources can further enhance communication by offering more engaging and flexible ways to deliver information:

- **Videos and Audio Recordings:** Spoken explanations can be easier to understand for those who prefer auditory learning or struggle with written text.

- **Interactive Digital Content:** Mobile apps, online tutorials, or other interactive tools allow users to engage with information at their own pace. These formats also provide opportunities for repetition, which can reinforce learning and improve retention.



When using images, it's important to be mindful of cultural considerations. Symbols, colors, and design patterns can carry different meanings in different cultures. For example, a checkmark may indicate approval in one country but mean "incorrect" in another.

Choosing culturally appropriate visuals helps prevent misunderstandings and ensures the intended message comes across as intended.

Additionally, pairing images with text is essential—visuals should complement the written message, not replace it, so their meaning is always clear.

PREPARING MATERIALS FOR TRANSLATION

Getting content ready for translation takes some planning, but it makes a big difference in the final result. Clear, well-structured text is easier to translate accurately and helps ensure your message comes across the way you intend. Simple things like using straightforward language, organizing information logically, and keeping formatting clean can save time and prevent confusion.

The following best practices will help you create content that's easier to translate and more effective for multilingual audiences.



1. Use a Translation-Friendly File Format

Choosing the right file format is crucial for efficiency. Always provide content in an **editable format** like Microsoft Word, Excel, Google Docs, or XML.

Avoid PDFs, images, or scanned documents whenever possible, as they require extra work to extract text before translation can even begin.

If you must use a PDF, provide the original source file (e.g., a Word document) to facilitate the process.



2. Organize Text in a Bilingual Spreadsheet

Using a spreadsheet format, such as Excel or Google Sheets, can streamline the translation workflow.

Create a structured table where:

- **Column A** contains the source text (e.g., English).
- **Column B** is reserved for the translation.
- Additional columns can be used for context, notes, or approval status.



3. Separate Text from Images

If your document includes images with text, avoid embedding the text directly in the image. Instead:

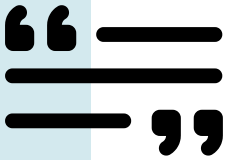
- Provide the text in a separate document for translation.
- If using design software like InDesign, Illustrator, or Photoshop, keep text layers editable so they can be easily updated.
- If text must be part of an image (e.g., infographics, diagrams), ensure there is enough space for translated text, as some languages require more space than others.



4. Communicate Translation Requirements Clearly

Before sending content for translation, clarify expectations with your Language Service Provider (LSP) or translator. Provide:

- Target audience details (e.g., general public, technical experts, specific cultural considerations).
- Tone and style preferences (formal, conversational, instructional).
- Deadline and delivery format (Word file, Excel spreadsheet, CMS entry, etc.).

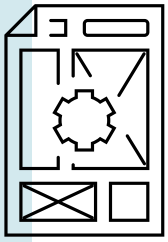


5. Leave Space for Text Expansion

Different languages take up varying amounts of space when translated. For example:

- Spanish and French translations are typically **15–30%** longer than English.
- Chinese and Japanese translations may take up less space but can affect text alignment.

If you're working with design layouts, leave extra space in text boxes, buttons, and UI elements to prevent text from getting cut off. This is especially important for software, websites, and print materials.



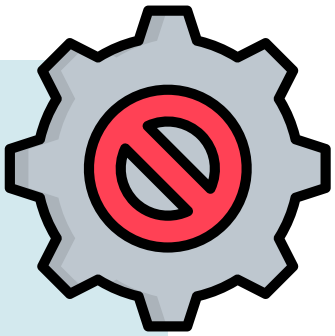
7. Use Consistent Formatting and Structure

Inconsistent formatting can make translations harder to process. Avoid:

- Extra spaces, manual line breaks, or unnecessary bold/italic styling.
- Complex table layouts or inline text formatting that doesn't follow a clear pattern.

Instead:

- Use styles and templates to ensure uniform formatting.
- Keep formatting simple to make it easier for translators to work with the text.
- Provide structured content where possible (e.g., numbered lists, bullet points) for clarity.



PROCEDURES WHEN LANGUAGE ASSISTANCE IS NOT IMMEDIATELY AVAILABLE

There may be times when language support isn't immediately accessible (for example, when an interpreter for a specific language can't be found right away or when phone interpretation services are temporarily unavailable). In these cases, staff should follow the steps outlined below:

1. **Identifying the Language and Documenting the Situation**
    a. Staff should use "I Speak" cards or other language ID tools to help determine the language the person speaks.
    b. Staff should document the interaction, including the time of the request, the language needed, what steps were taken to find help, and what happened as a result.
2. **Escalating the Request**
    a. Staff should contact the Language Access Coordinator or their supervisor as soon as possible.

b. The Coordinator will try to find an interpreter using other vendors, regional or national interpreter networks, or community organizations.

d. If the language is very rare and no interpreter can be found right away, staff should kindly explain the situation to the individual and follow up as soon as possible with the necessary support.

TRANSLATING BRIEF WRITTEN COMMUNICATIONS (EMAIL, TEXT MESSAGING)



When communicating in writing, whether by email, text, or other messaging platforms, with individuals who have limited English proficiency (LEP), the following practices should be followed:

Use Qualified Translators

Whenever possible, written communication should be translated by a qualified human translator, especially when the content is legal, medical, or otherwise important. Bilingual staff may also assist with written translations. When using a qualified translator, staff must follow the procedures outlined on page 14 of this plan.

Use Machine Translation

If a human translator isn't immediately available and the message is time-sensitive, or if the short message is does not involve legal, medical, or other serious implications, staff may use a machine translation tool (such as Google Translate) as a temporary solution.

Examples of acceptable use include confirming an appointment time, providing basic directions, or letting someone know when a staff member will call or follow up.



When to Use an Interpreter Instead

If the written exchange becomes complicated, unclear, or continues over multiple messages, staff should consider switching to a phone or video interpreter to ensure clear and accurate communication.

In those cases, staff should follow the interpretation procedures outlined on page 13 of this plan.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Fire Year: 2026

Title VI Coordinator: Jamie Summers Form Completed By: Jamie Summers

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes No

How does your department disseminate Title VI information (including your language access plan) to all employees?
Post on Bulletin boards

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

All public lobbies in buildings and Fire stations

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Waiting to see if Human Relations puts a plan in place that is consistent across Metropolitan Government of Nashville & Davidson Cty.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: General Services Year: 2026

Title VI Coordinator: Brian Pate Form Completed By: Brian Pate

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Fleet Heavy Shop, Fleet Light Shop, Lindsley Hall

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Waiting for guidance from Metro Human Relations Commission

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: General Sessions Court Year: 2026

Title VI Coordinator: Gina Fox Form Completed By: Kyle Sowell and Gina Fox

Form Completion Date: 6/3/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided Only employees associated with federal assistance grants participate in Title VI training sponsored by the Tennessee Dept. of Mental Health and Substance Abuse Services or the Tn Human

Civil_Rights_Trainin
g_for_Employees 20

Rights Commission PowerPoint on their website.
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not- All Title VI information including the Language Access Plan is provided to employees who are associated with federal assistance grants.

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Common areas within the offices of the Mental Health Court, Athena's and Recovery Court including the locations where the participants attend treatment and in their participant handbooks.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

48A complaint PP.docx

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

Other Written Title VI policy is provided to all participants within their participant handbook.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? none

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Each grant program manager monitors compliance for their perspective grant. Each Program Manager possesses the subrecipients Title VI compliance certificates.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

PDF

TN Spoken & Written LAP Revised

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Health (MPHD) Year: 2026

Title VI Coordinator: José Cruz Form Completed By: José Cruz

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

New hire orientation

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Email, intranet, notices/posters

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Lentz Public Health Center and all satellite clinics including Woodbine, East, South Nutrition Center, and MACC.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Metro Purchasing includes non-discrimination requirements in the procurement process based upon the specifications that we submit.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metro Public Health Dept
Nashville/Davidson County
Protecting, Improving, and Sustaining Health

TITLE VI OF THE 1964 CIVIL RIGHTS ACT

The Law

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 financial assistance."

Metro Nashville and the Metro Public Health Department are committed to ensuring that the level and quality of public health services service are provided without regard to race, color, national origin, sex, age, disability, religion, medical condition, marital status or sexual orientation. We are further committed to promoting the full and fair participation of all potentially affected populations and in preventing denial, reduction, or delay in benefits related to programs and activities affecting minority and low-income populations; and providing meaningful access to MPHD services, programs, and activities by persons with limited English proficiency (LEP).

Applicability

Title VI covers all agencies receiving federal funds. Some examples include: student aid; employee training; grants; loans property; loans of personnel; tax incentives; and technical assistance.

Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or by a third party, within 90 days from the date of the alleged discriminatory act. Complaints should be directed to: José Cruz Metro Public Health Department, 2500 Charlotte Avenue, Nashville, TN 37209. Our coordinator may also be reached by phone at **615.340.8963** if you have any questions or complaints regarding Metro Public Health Department Title VI compliance.

Metro Public Health Dept
Nashville/Davidson County
Protecting, Improving, and Sustaining Health

TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964

La Ley

El título VI de la ley de derechos civiles de 1964 estipula que "Ninguna persona en los Estados Unidos, por razones de raza, color u origen nacional, quedará privada de participar en cualquier programa o actividad que reciba la asistencia financiera federal; tampoco se le negarán los beneficios a los mismos, ni será sometida a discriminación alguna con relación a ellos".

El departamento metropolitano de salud pública (MPHD, por sus siglas en inglés) y el gobierno metropolitano de Nashville se comprometen a garantizar que el nivel y la calidad de los servicios de salud pública se brinden sin distinción de raza, color, nacionalidad, sexo, edad, discapacidad, religión, afección médica, estado civil u orientación sexual. Además, estamos comprometidos a promover la participación justa y total de todas las poblaciones potencialmente afectadas y en prevenir la negación, la reducción o el retraso en los beneficios relacionados con los programas y actividades que afectan a las poblaciones minoritarias y de bajos ingresos; y proporcionar acceso significativo a los servicios, programas y actividades de MPHD para personas con dominio limitado del inglés.

Aplicabilidad

El título VI cubre a todas las agencias que reciben fondos federales. Los siguientes son algunos ejemplos: ayuda financiera para los estudiantes; programas de capacitación para los empleados; subvenciones; préstamos a personal laboral; programas de incentivo para reducir impuestos y asistencia técnica.

El título VI es aplicable a la discriminación en la totalidad de la agencia y no se limita sólo a hechos que involucren los programas de asistencia federal.

Presentación de queja

Las quejas relacionadas con el título VI que involucren a quienes reciban o sean beneficiarios de cualquier programa que acepte asistencia federal, podrán ser presentados por cualquier individuo, una clase o un tercero, ante el Coordinador del Título VI, dentro de los 90 días a partir de la fecha en que hubiere tenido lugar el supuesto acto de discriminación. Las quejas deben ser dirigidas a José Cruz, departamento de salud pública, 2500 Charlotte Avenue, Nashville, Tennessee 37209. Se puede comunicar con nuestro Coordinador por teléfono al **615.340.8963** si usted tiene alguna pregunta o queja con respecto al acatamiento del título VI en el departamento metropolitano de salud pública.

TITLE VI OF THE 1964 CIVIL RIGHT ACT

المادة رقم 6 من قانون الحقوق المدنية لعام 1964

القانون

تقتضى المادة رقم 6من قانون الحقوق المدنية لعام 1964 أن "لا يتم استبعاد أي شخص في الولايات المتحدة ، على أساس العرق أو اللون أو الأصل القومي من المشاركة في أو الحرمان من مزايا أو التعرض للتمييز و ذلك فيما يخص أي برنامج أو نشاط يتلقى مساعدة مالية فيدرالية ".

يلتزم مترو ناشفيل وقطاع الصحة العامة بمترو بضمان توفيرخدمات الصحة العامة بكفاءة ومستوى لائق دون أى اعتبار للعرق أو اللون أو الأصل القومي أو الجنس أو السن أو الإعاقة أو الدين أو الحالة الطبية أو الحالة الاجتماعية أو التوجه الجنسي. ونحن ملتزمون كذلك بتعزيز المشاركة الكاملة والعادلة لجميع السكان الذين من المحتمل أن يكونوا متضررين ؛ وفي تجنب رفض أو تقليل أو تأخير المنافع المتعلقة بالبرامج والأنشطة التي تؤثر على الأقليات وذوي الدخل المنخفض. وتوفير وصول مفيد إلى خدمات وبرامج ونشاطات قطاع الصحة بمترو بناشفل (MPHD) من قبل الأشخاص ذوي الكفاءة المحدودة في اللغة الإنجليزية (LEP).

القابلية للتطبيق

تغطى المادة رقم 6جميع المؤسسات التي تتلقى أموالًا فيدرالية. بعض الأمثلة تشمل: مساعدة الطلاب وتدريب الموظفين و المنح و ملكية القروض و القروض الخاصة والحوافز الضريبية والمساعدة الفنية.

تنطبق المادة رقم 6 على التمييز بجميع المؤسسات ، وليس فقط على النشاطات التي لها علاقة ببرامج تتلقى مساعدة فدرالية.

تقديم شكوى

يجوزللمتلقيين والمستفيدين من الخدمات تقديم الشكاوى المتعلقة بالمادة رقم 6 ، يمكن تقديم الشكاوى من قبل فرد أو فئة أو طرف ثالث إلى منسق المادة رقم 6، وذلك في غضون 90 يومًا من تاريخ الفعل التمييزي المزعوم. يجب توجيه الشكاوى إلى:

Jose Cruz
Metro Public Health Department
2500 Charlotte Avenue
Nashville TN 37209

ويمكن أيضا التواصل مع منسق المادة رقم 6 عبر الهاتف التالى : **615.340.8963** ، فى حالة إذا ما كان لديك أية أسئلة أو شكاوى تتعلق بإمتثال قطاع الصحة بمترو للمادة رقم 6.

LANGUAGE ACCESS PLAN





METRO PUBLIC HEALTH DEPARTMENT OF NASHVILLE & DAVIDSON COUNTY

Metro Public Health Dept
Nashville/Davidson County
Protecting, Improving, and Sustaining Health

March 2026

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MPHD LANGUAGE ACCESS STATEMENT

The purpose of this document is to establish guidelines for the Metro Public Health Department personnel to ensure equitable services for and effective communication with persons whose primary language is not English, and who have limited or no ability to speak, read, write, or understand the English language. This includes communities traditionally identified as Limited English Proficient (LEP) and D/deaf or Heard 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, Section 1557 of the Affordable Care Act, and the Americans with Disabilities Act. Adherence to these guidelines is essential to ensure that all people in Nashville and Davidson County receive meaningful access to Metro Public Health Department programs, benefits, and services.

The vision of Metro Public Health is a community in which all people achieve their full potential for health and well-being. This document aims to serve as another tool to help guide the Department towards realizing that vision, and toward fulfilling our mission of protecting, improving, and sustaining the health and well-being of all people in Nashville and Davidson County.

TERMINOLOGY AND KEY PHRASES

Americans with Disabilities Act:

The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

Cultural & Linguistic Services:

Culturally and linguistically appropriate services (CLAS) is a way to improve the quality of services provided to all individuals, which will ultimately help reduce health disparities and achieve health equity. CLAS is about respect and responsiveness: Respect the whole individual and respond to the individual's health needs and preferences.

D/deaf:

The word "Deaf" with a capital "D" refers to individuals and communities that identify with Deaf culture and American Sign Language. The word "deaf" with a lower case "d" refers to the condition of hearing loss.

Effective communication:

Effective communication is the process of exchanging ideas, thoughts, opinions, knowledge, and data so that the message is received and understood with clarity and purpose. Communication is not effective if only one person can transmit their ideas.

Hard of Hearing:

Persons who are Hard of Hearing are those with hearing losses that may impair their understanding of sounds, including communication.

Interpreting:

Interpreting is rendering a spoken or signed message into another spoken or signed language, preserving the register, and meaning of the source language content. Bilingual staff may not necessarily have the linguistic skills or training to provide interpretation for highly technical sessions (i.e., legal, medical).

Languages of limited diffusion:

Languages of limited diffusion are those languages that are spoken by relatively small numbers of people, in contrast to languages that are spoken in several different countries and are widely taught.

Limited English Proficiency (LEP):

Limited English Proficiency refers to persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Meaningful Access:

Meaningful access is the ability to use services and benefits comparable to those enjoyed by members of the mainstream cultures. It is achieved by eliminating communication barriers and ensuring that the client or potential client can communicate effectively.

Non-English Language Preference (NELP):

NELP refers to individuals who prefer a non-English language, including sign language, with respect to a particular type of service, benefit, or encounter.

Over-the-phone Interpreting (OPI):

OPI is the act of verbally translating one language into another over the phone. This can be done via a 3-way call (you, the interpreter, and a client/patient).

Qualified Bilingual Employees (QBE):

A QBE is an individual who can communicate in a language other than English and who has successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed, per MPHD Qualified Interpreter Services Policy (2019).

Section 1557 of the Affordable Care Act:

Requires covered entities to provide effective communication with individuals with disabilities, including those with limited English proficiency, and to provide language assistance services free of charge, in an accurate and timely manner.

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".

Translation:

Translation is the process of converting the written word from one language into another language in a way that is culturally and linguistically appropriate so it can be understood by its intended audience.

Vital documents:

Any documents that are critical for ensuring meaningful access to MPHD's major activities, programs, and services. Whether or not a document is vital may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the person who prefers a non-English language if the information in question is not provided accurately or in a timely manner. Such documents may include, but are not limited to:

- Applications and consent forms
- Program related compliance plans
- Notices and letters containing important information regarding participation in a program.
- Notices pertaining to the reduction, denial, or termination of services or benefits, the right to appeal such actions, or that require a response from the beneficiary, and
- Notices advising persons with a non-English language preference of the availability of free language assistance.

Video Remote Interpreting (VRI):

VRI uses audio and video technologies to provide MPHD clients and patients with spoken or sign language interpreting through a remote or off-site interpreter.

QUALIFIED INTERPRETER SERVICES POLICY (2019)

Qualified interpreter services are provided during all hours of operation at no cost to customers and their companions in accordance with federal laws, including Section 1557 of the Patient Protection and Affordable Care Act, and Title VI of the Civil Rights Act of 1964. Section 1557 prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. Covered entities are prohibited from relying on unqualified staff when providing language assistance services. Title VI prohibits discrimination based on race, color, or national origin in programs or activities which receive federal funding. The law also requires that customers be told they have a right to receive interpreter services, including sign language, and how to address and file complaints pertaining to interpreter services. An ability to speak the patient's language does not necessarily qualify an individual to interpret medical discussions.

Policy

Qualified interpreter services will be provided to LEP individuals during regular MPHD business hours. No individual will be denied services based on an ability to speak English. The type of interpreter services offered must be appropriate to the situation.

Procedure

1. Any customer/patient who expresses a preference for a non-English language, including sign language, or has demonstrated a need for interpreter services shall be offered the use of a qualified interpreter at all administrative and clinical points of contact during all hours of operation at no charge to the client/patient. The offer of qualified interpreter services is made even in a situation where a client/patient is accompanied by a companion who may be capable of interpreting for the client/patient. If language assistance is needed after regular business hours, MPHD staff can use the services of the approved over-the-phone language vendors. Please contact your supervisor or the Cultural & Linguistic Services manager if you need information on how to contact the approved language vendors.

2. Posted notices of the availability of free language assistance services include the contact information for MPHD's Title VI Coordinator where clients/patients may inquire and/or file complaints about how MPHD delivers language assistance services

3. The reliance on adult family members, companions, and/or friends as interpreters is inappropriate. However, the client/patient has the right to refuse the interpreter services MPHD offers; such refusal must be documented. A qualified interpreter may be asked to monitor the encounter to ensure full comprehension by all parties and promote patient autonomy.

4. Occasionally, the sensitive nature of a patient's clinical condition may cause providers or staff to request qualified interpreter services to participate in the encounter despite the patient's preference to use an adult family member or a friend. In such situations, the circumstances leading to the override of the patient's preference are documented in the medical record, as applicable.

5. Minor children shall not be used as interpreters except in extraordinary situations such as medical emergencies where any delay could result in harm to a client/patient, and only until a qualified interpreter is available. Use of a minor child for interpretation under these circumstances should be documented in the medical record, as applicable.

6. The use of language apps or other electronic translation devices is inappropriate as they are unprofessional and unreliable forms of translation.

7. Clients/Patients shall not be asked to bring their own interpreter to an administrative or clinical point of contact.

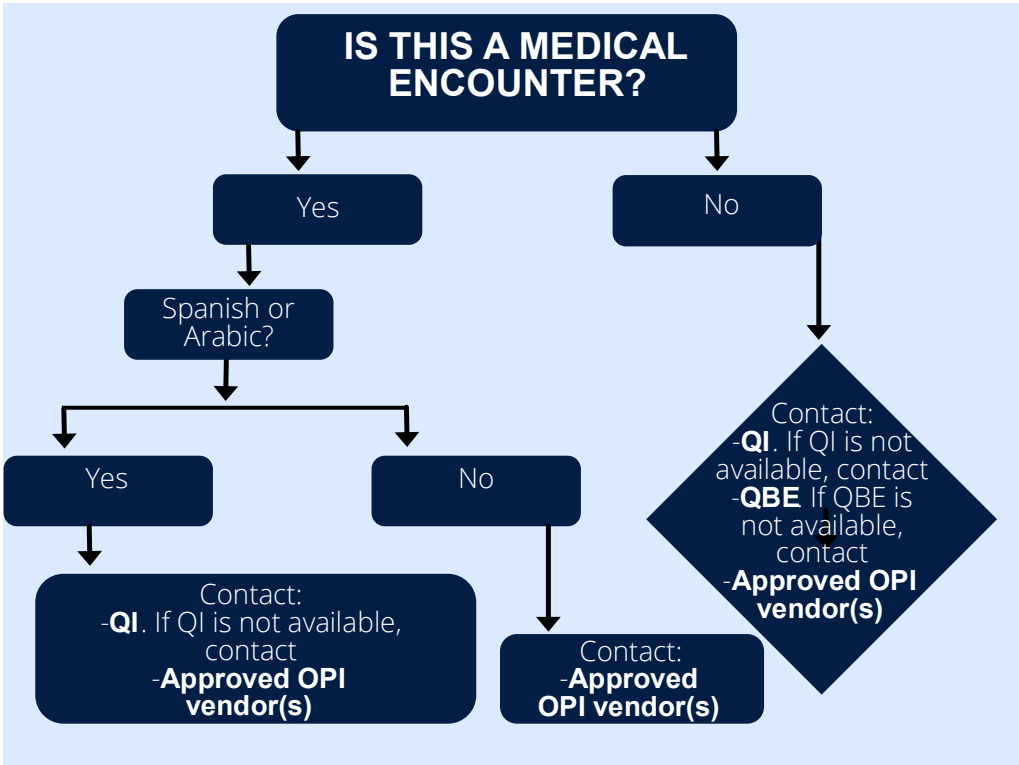
8. D/deaf and Hard of Hearing clients/patients have a right to qualified interpreter services to ensure effective communication. Please contact the Cultural & Linguistic Services manager to request and schedule a sign language interpreter.

9. Bilingual employees are not qualified interpreters and therefore cannot provide qualified interpreter services.

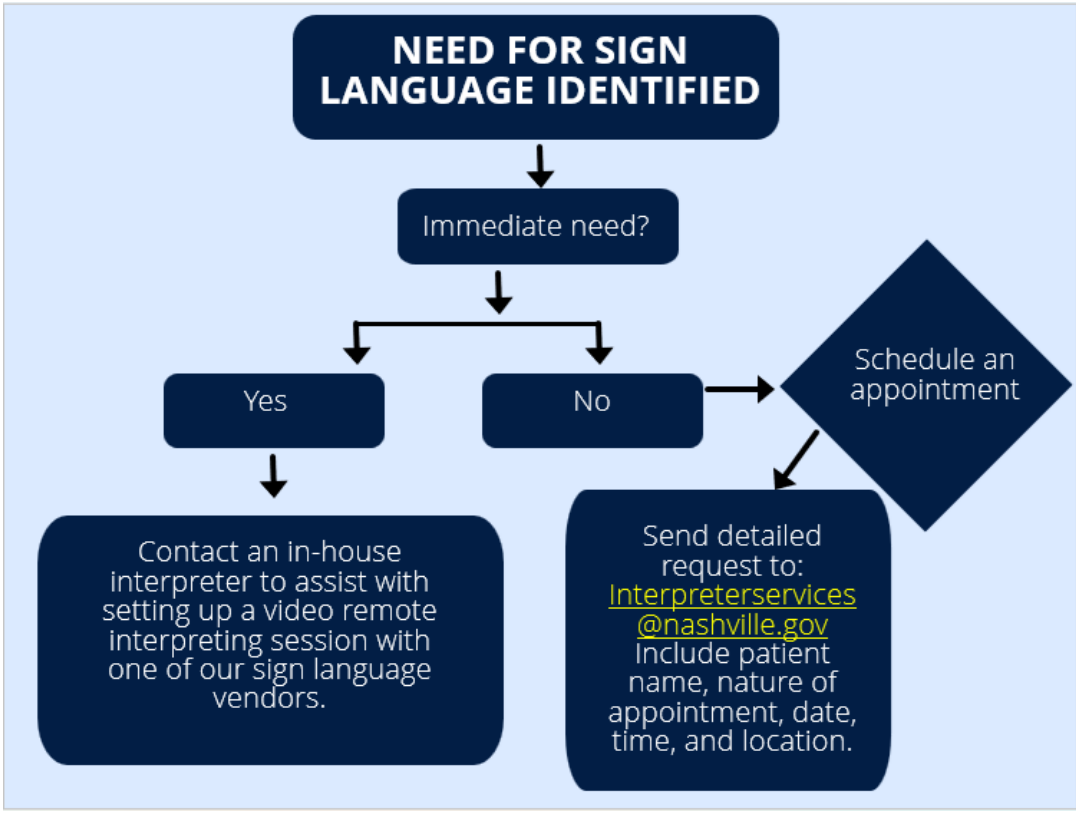
Applicability

This policy applies to all Metro Public Health Department employees and contractors.

Spoken Language Assistance Process



Sign Language Assistance Process



Please find the policy in its entirety on the MPHD intranet under Interpreter Services, at Staff Interpreters (nashville.org)/

LANGUAGE ACCESS SERVICES

One of the goals of the Cultural and Linguistic Services Division is to ensure that Metro Public Health (MPHD) communicates effectively with persons with a non-English language preference, including persons who use sign language. This requires effective communication at all points of contact. To ensure meaningful access, MPHD personnel shall provide reasonable and free language access services to persons with a non-English language preference whom they encounter, or whenever someone requests language access services relating to MPHD programs or activities. The nature and scope of language access services provided are based on the encounter, request, totality of the circumstances, and using the following four-factor analysis:

- The number or proportion of persons with a non-English language preference served or encountered in the eligible service population.
- The frequency with which persons with a non-English language preference come in contact with the program.
- The nature and importance of the service or benefit provided by the program, and
- The resources available to the agency and costs.

Any MPHD personnel who have questions about whether, or how, to provide effective language access services to persons with a non-English language preference should refer to the Cultural and

Linguistic Services (CLS) manager. The CLS manager serves as the point of contact for MPHD's language access efforts.

Interactions with Persons with a Non-English Language Preference

- **Staff responsibility** – At the first point of contact with a person who expresses a preference for a non-English language, or if it becomes evident that a person does not speak and understand English well enough to effectively participate or fully understand questions and answer them without difficulty, MPHD personnel should determine the person's primary language and obtain appropriate language access services. MPHD personnel may seek assistance from a supervisor or the CLS manager.
    - Contact an interpreter when the client/patient:
        - Requests it.
        - Speaks English as a second language and is in a stressful, complex, or unfamiliar situation.
        - Is not easily understood.
        - Responds only in a limited way.
        - Relies on family or friends to interpret.
        - Wishes to communicate in their preferred language.
        - Cannot grasp or respond to questions in English.
    - Use an "I Speak…" card *(see **NOTICES** section*)

        - Remember: an interpreter serves the MPHD employee as well as the client/patient. You can request an interpreter if you believe you need one. To determine a client's level of English language proficiency, ask open-ended questions that require more than a 'yes' or 'no' answer, such as 'How may I help you today?'
- **Supervisor responsibility** – MPHD supervisors, in consultation with the CLS manager, should ensure that MPHD personnel who interact with persons with a non-English language preference, are prepared to do the following:
    - Determine the primary language of a person with a non-English language preference.
        - Have "I Speak…" cards available.
        - Share OPI access codes/PIN.
    - Utilize appropriate resources to provide reasonable and free language access services to persons with a non-English language preference.
        - MPHD Interpreter Line phone number
        - Post notices of free interpreter services.

Best Practices When Providing Language Access Services

When providing reasonable and free language access services to persons with a non-English language preference, MPHD personnel should consider:

- **In-house Interpreters**
    - MPHD has qualified in-house interpreters that are available in person and by phone at multiple clinic locations. A qualified interpreter is a person who can

interpret effectively, accurately, and impartially, using necessary specialized vocabulary.

- Updated contact information for the in-house interpreters can be found on the MPHD intranet.



  - MPHD also has qualified bilingual employees (QBEs). QBEs are persons who can communicate effectively in a language other than English and who have successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed, within their home division or program. For example, a WIC QBE can only assist with WIC non-medical encounters.

- **Over-the-phone Interpreting (OPI)**
  - OPI is a 3-way telephone conference call between two persons who speak different languages, and an interpreter.

- Ask your supervisor about your program's OPI access codes/PINs to access OPI vendor services.
  - **Supervisor responsibility –** Contact the CLS manager if you need an access code/PIN for your program.
- Currently, MPHD has multiple vendors that offer OPI. Updated contact information for the OPI vendors can be found on the MPHD intranet.
  - Call an in-house interpreter first.
  - If they are unavailable, or you need a language that is not offered in-house, call one of the OPI vendors. If you cannot connect with an interpreter within a reasonable amount of time, hang up and call another OPI vendor.



- **Video Remote Interpreting (VRI)**



  - The Americans with Disabilities Act (ADA) and Rehabilitation Act of 1973 requires healthcare providers to ensure effective communication with people who are D/deaf or Hard of Hearing.
    - When using VRI for a sign language encounter, please consider screen size. Screen size needs to be sufficient for the video interpreter's hand signs to be easily readable at a distance.
  - VRI can also be used in situations where in-person interpreting is not possible or practical but having the face-to-face interaction is crucial for effective communication.
    - If you need to schedule a VRI session for a sign or spoken language session, please send a request to InterpreterServices@nashville.gov.

- **Translation Services**
  Translation is the process of converting the written word from one language into another language in a way that is culturally and linguistically appropriate so it can be understood by its intended audience.

  Translation is another tool that can be used to engage the community and increase language access throughout everything we do at MPHD. Translation should be considered for our public communications, social media posts, educational materials, and vital documents. Although the translation process takes time, priority will be given to information that needs to be disseminated as soon as possible. Please plan ahead.

  - The Cultural and Linguistic Services (CLS) division offers in-house translations. All requests can be sent to InterpreterServices@nashville.gov or the CLS manager.
  - CLS will follow an internal process for deciding whether a translation can be completed in-house. The process includes reviewing the length of the document, complexity, and considering the available resources (i.e., staff, time). If it is determined that a translation cannot be worked on in-house, CLS will provide options, including contacting a translation vendor to complete the project.
  - Refer to **TERMINOLOGY AND KEY PHRASES** under **Vital Documents** for a list of documents that should be considered for translation.

While qualified interpreters may not be readily available when needed, please take the time to call all qualified sources including in-house interpreters and qualified vendors (via OPI or VRI). Do not use children as interpreters except in emergency cases, and only until a qualified interpreter is available. Do not rely on friends, family members, or machine translation for interpretation or translation, and do not ask clients to provide their own interpreters. Clients should be informed that interpreter services are available to them at no cost. If a client refuses to work with a qualified interpreter and prefers to communicate via a friend or family member, it is up to the provider to determine if an interpreter should still be used to ensure effective communication.

Machine translation alone is generally insufficient to meet civil rights requirements. Any use of these tools must be reviewed by a **qualified human interpreter/translator** when the underlying text is critical for meaningful access to an activity or program for people with LEP.

TRAINING

Staff training is an important step in providing language access services to individuals with a preference for a non-English language. Trainings should include everyone who interacts with clients/patients. MPHD offers an annual **Title VI and Language Access Services** training. The training can be found in Oracle Learning. MPHD also includes training about communication and language services as part of the onboarding process for new hires. It is also important that all staff members periodically receive refreshers regarding policies, processes, and resources.

- **Staff Responsibility** – Complete annual **Title VI and Language Access Services** training. Ask your supervisor about the available resources in your work area (i.e., badges with interpreter numbers, the PIN for OPI, etc.).

- **Supervisor Responsibility** – Complete annual **Title VI and Language Access Services** training. Ensure that staff is aware of and able to access resources that are specific to your site. Consult with the CLS manager if necessary.

- **CLS Division Responsibility** – Update the annual training and the MPHD intranet with relevant information. Ensure that appropriate resources are available for staff (i.e., badges with interpreter numbers, rack cards with relevant information, etc.).

  If you have a specific need for training or education related to culturally and linguistically appropriate services, please contact the CLS manager.

NEEDS ASSESSMENT

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. Best practices include:

- **Annual Assessment**
  - Updating translated vital documents along with English originals.
  - Assessing changes in demographics, types of services, or other needs that may require reevaluation of language access policies and procedures.

- **Data Collection**
  - Collecting information on primary language of clients/patients, use and language of interpretation services, distribution of translated documents.

MONITORING AND CONTINUOS IMPROVEMENT

Without appropriate interpretation and translation services, it can be difficult to communicate effectively with persons with a non-English language preference, which can result in liability related to poor health outcomes, lower client/patient satisfaction, and violation of Federal laws prohibiting discrimination on the basis of national origin. Providing high-quality language access services at each point of contact along the health care continuum is a critical component of high-quality care.

- **Staff Responsibility** – Inform the CLS manager of any specific challenges encountered in your division, site, or program.
    - What can be done to improve language access services in your area?

- **CLS Division Responsibility** – Inform division, site, and program managers regarding changes to the language access services. Engage in ongoing conversations regarding the improvement of services and work with leadership concerning challenges that need to be addressed in order to be in compliance.

COMPLAINTS

A complaint regarding the inadequate provision of language assistance may be made in person, over the phone, or in writing to the CLS manager. Complaints can be initiated by members of the public or a staff member that has witnessed situations that are in violation of Title VI. Written language access complaints can also be sent via email to InterpreterServices@nashville.gov – please add **Language Access Complaint** to the subject line to ensure it is forwarded to the CLS manager.

The CLS manager (or a designee) shall conduct an investigation of the complaint. This investigation will allow all interested persons an opportunity to submit evidence relevant to the complaint. The CLS manager will make referrals, as appropriate, for action.

A person may file a complaint directly with the U.S. Department of Health and Human Services, Office for Civil Rights. A person can file such a complaint electronically through the Office for Civil Rights Complaint Portal, which is available at: https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf or by mail or phone at: U.S. Department of Health and Human Services, 200 Independence Avenue, SW, Room 509F, HHH Building, Washington, D.C. 20201. Complaint forms are available at: https://www.hhs.gov/ocr/office/file/index/html/index.html. Such complaints must be filed within 180 days of the date of the alleged discrimination. The availability and use of this grievance procedure does not prevent a person from pursuing other legal or

administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, age, disability, or sex in court or with the U.S. Department of Health and Human Services, Office of Civil Rights.

EVALUATION

Source: Metro Language Access Guide & Toolkit, ADA & Title VI Resources – Metro Human Relations Commission

Program managers are encouraged to complete their own language access assessment to reflect on how their program/division is promoting equitable access.

Understanding How Linguistic Minorities Interact with Your Agency

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with linguistic minorities?

- ☐ Yes
- ☐ No

2. Please describe the manner in which your agency interacts with linguistic minorities:

- ☐ In-Person

 Telephonically

 Electronically (e.g., email or website)

 Via Correspondence

 Other: (please specify) _____

3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies to nonprofits and other organizations.)

 Yes

 No

4. If your agency does provide federal financial assistance to non-federal entities:

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

5. How does your agency identify linguistic minorities? (Select all that apply)

- Assume limited English proficiency if communication seems impaired.
- Respond to individual requests for language assistance services.
- Self-identification by the non-English speaker
- Ask open-ended questions to determine language proficiency on the telephone or in person.
- Use of “I Speak” language identification cards or posters.
- Based on written material submitted to the agency (e.g., complaints)
- We have not identified linguistic minorities.
- Other (Please specify):

6. Does your program have a process to collect data on:

a. The number of linguistic minorities that you serve?

- Yes
- No

b. The number of linguistic minorities in your service area?

- ☐ Yes
- ☐ No

c. The number and prevalence of languages spoken by linguistic minorities in your service area?

- ☐ Yes
- ☐ No

7. How often does your agency assess the language data for your service area?

- ☐ Annually
- ☐ Biennially
- ☐ Not Sure
- ☐ Other:_____

8. What data does your agency use to determine the linguistic minority communities in your service area? (Select all that apply)

- ☐ Census
- ☐ US Dept. of Education
- ☐ US Dept. of Labor
- ☐ State Agencies
- ☐ Community Organizations
- ☐ Intake information

☐ Other:

9. Do you collect and record primary language data from individuals when they first contact your programs and activities?

☐ Yes

☐ No

10. If you collect and record primary language data, where is the information stored?

11. What is the total number of linguistic minorities who use or receive services from your program each year?

12. How many linguistic minorities attempt to access your programs or services each month?

13. How many linguistic minorities use your programs or services each month?

14. 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 and Frequency of Encounters

1. _____
2. _____
3. _____
4. _____
5. _____

Providing Language Assistance Services

15. Does your agency currently have a system in place for tracking the type of language assistance services it provides to linguistic minorities at each interaction?

- ☐ Yes
- ☐ No

16. What data, if any, do you maintain regarding language assistance services? (Select all that apply)

- ☐ Primary language of persons encountered or served
- ☐ Use of language assistance services such as interpreters and translators
- ☐ Funds or staff time spent on language assistance services
- ☐ Number of bilingual staff
- ☐ Cost of interpreter services
- ☐ Cost of translation of materials into non-English languages
- ☐ Other (Please specify): _____

17. Does your agency have a system to track the cost of language assistance services?

- ☐ Yes
- ☐ No

18. What types of language assistance services does your agency provide? (Select all that apply)

- ☐ Bilingual staff

- ☐ In-house interpreters (oral)
- ☐ In-house translators (documents)
- ☐ Contracted interpreters
- ☐ Contracted translators
- ☐ Telephone interpretation services
- ☐ Video interpretation services
- ☐ Language bank or dedicated pool of interpreters or translators
- ☐ Volunteer interpreters or translators
- ☐ Interpreters or translators borrowed from another agency
- ☐ Other (Please specify): _____

19. Does your agency have a certification or assessment process that staff must complete before serving as interpreters or translators for linguistic minorities?

- ☐ Yes
- ☐ No

a) Does the process include use of standardized language proficiency exams?

- ☐ Yes
- ☐ No

20. Does your agency ask or allow linguistic minorities to provide their own interpreters or have family members or friends interpret?

- ☐ Yes

☐ No

21. Does your agency have contracts with language assistance service providers (in- person interpreters, telephone interpreters, video interpreters, or translators)?

☐ Yes

☐ No

22. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?

☐ Yes

☐ No

23. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area?

☐ Yes

☐ No

24. Which vital written documents has your agency translated into non-English languages?

☐ Consent forms

☐ Complaint forms

☐ Intake forms

☐ Notices of rights

☐ Notice of denial, loss or decrease in benefits or services

☐ Notice of disciplinary action

 Applications to participate in programs or activities or to receive benefits or services

 Other (please specify): _____

Training of Staff on Policies and Procedures

25. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to linguistic minorities?

 Yes

 No

26. Who receives staff training on working with linguistic minorities? (Select all that apply)

 Management or senior staff

 Employees who interact with or are responsible for interactions with linguistic minorities

 Bilingual Staff

 New employees

 All employees

 Volunteers

 Others (Please specify):

 None of the above

27. Are language access policies and issues included in the mandatory training curriculum for staff?

 Yes

 No

28. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to linguistic minorities?

 Yes

 No

29. Does staff receive periodic training on how to obtain and work with interpreters?

 Yes

 No

30. Does staff receive periodic training on how to request the translation of written documents into other languages?

 Yes

 No

31. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?

 Yes

 No

32. 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

33. Does your agency translate signs or posters announcing the availability of language assistance services?

 Yes

 No

34. When your agency updates information on its website, does it also add that content in non- English languages?

 Yes

 No

Providing Notice of Language Assistance Services

35. How do you inform members of the public about the availability of language assistance services? (Select all that apply)

 Frontline and outreach multilingual staff

 Posters in public areas

 “I Speak” language identification cards distributed to frontline staff

 Website

 Social networking website (e.g. Facebook, Twitter)

 E-mail to individuals or a list serv

 Other (Please specify):

 None of the above

36. Do your translated program outreach materials inform linguistic minorities about the availability of free language assistance services?

 Yes

 No

37. Does your agency regularly advertise on non- English media (television, radio, newspaper, and websites)?

 Yes

 No

38. Does your agency inform community groups about the availability of free language assistance services for linguistic minorities?

 Yes

 No

39. Does your agency inform current applicants or recipients about the availability of language assistance services?

 Yes

 No

40. Does the main page of your agency website include non-English information that would be easily accessible to linguistic minorities?

 Yes

 No

41. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services?

- ☐ Yes
- ☐ No

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

42. Does your agency have a written language access policy?

- ☐ Yes
- ☐ No

43. If so, is a description of this policy available to the public?

- ☐ Yes
- ☐ No

44. How often is your agency's language access policy reviewed and updated?

- ☐ Annually
- ☐ Biennially
- ☐ Not Sure
- ☐ Other:_____

45. When was the last time your agency's language access policy was updated?

Month:

Year:

46. How often does your agency update its data on the linguistic minority communities in your service area?

- ☐ Annually
- ☐ Biennially
- ☐ Not Sure
- ☐ Other:_____

47. Does your agency have a language access coordinator?

- ☐ Yes
- ☐ No

48. Does your agency have a formal language access complaint process?

- ☐ Yes
- ☐ No

49. Has your agency received any complaints because it did not provide language assistance services?

- ☐ Yes
- ☐ No

50. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?

- ☐ Yes
- ☐ No

51. 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

NOTICES

Posting notices about the availability of language access services is an effective way to ensure persons with a non-English language preference can meaningfully access program services. It is helpful to post notices in the reception area and other areas where patients and staff interact. It may also be helpful to post notices on the website, at entrances, in examination rooms, and at other locations where individuals may interact with the Department and need assistance.

"I Speak" …cards.

If presented with an "I Speak…" card, please honor the request and contact an interpreter. You can request cards from the CLS division and display them in your reception area.



Point to Your Language

Use this list for assistance in identifying a person's preferred language. You can request the list from the CLS division and display in your reception area.



INTERPRETERS AVAILABLE

You have access to interpretation services 24/7 at no personal cost to you.
This chart includes languages commonly spoken in your community, additional languages are available.

***English*: Do you speak [language]? We will provide an interpreter at no personal cost to you.**

Amharic አማርኛ	አማርኛ ይናገራሉ? እርስዎ በማለዎ ምንም ወጪ ሳያወጡ አስተርጓሚ እናቀርባለን።
Arabic اللغة العربية	هل تتحدث اللغة العربية؟ سوف نوفر لك مترجمًا فوريًا من دون أي تكلفة عليك.
Armenian Հայերեն	Դուք հայերեն խոսո՞ւմ եք: Մենք Ձեզ անվճար թարգմանիչ կտրամադրենք:
Bengali বাংলা	আপনি কি বাংলায় কথা বলেন? আমরা আপনাকে একজন দোভাষী (ইন্টারপ্রিটার) দেব বাড় জন্য আপনার ব্যক্তিগতভাবে অর্থব্যয় করতে হবে না।
Brazil-Portuguese Português	Você fala português? Nós lhe forneceremos um intérprete, sem nenhum custo adicional.
Burmese မြန်မာ	သင် မြန်မာစကား ပြောပါသလား။ သင့်အတွက် တုန်ကူစရိတ် မရှိစေဘဲ စကားပြန်တစ်ဦး ကျွန်ုပ်တို့ ပေးပါမည်။
Cambodian ភាសាខ្មែរ	តើអ្នកនិយាយភាសាខ្មែរដែរទេ? យើងខ្ញុំនឹងផ្តល់ជូនអ្នកបកប្រែភាសាដោយឥតគិតថ្លៃថ្លាល់ខ្លួនដល់អ្នក។
Cantonese 粵語	你講唔講粵語？我哋將免費為你提供翻譯。
Cape Verdean Creole Kriolu di Kabu Verdi	Bu ta fala Kriolu di Kabu Verdi? Nu stá ta bai oferesi un intérpreti ku ninhun kustu pa bó.
Dari (Afghanistan) دری	آیا شما دری صحبت میکنید؟ ما به شما ترجمان رایگان مهیا میکنیم.
Farsi فارسی	فارسی صحبت می کنید؟ یک مترجم شفاهی رایگان در اختیار شما قرار خواهیم داد.
French Français	Parlez-vous français ? Nous vous fournirons gratuitement un interprète.
Haitian Creole Kreyòl Ayisyen	Èske ou pale Kreyòl Ayisyen? N ap ba ou yon entèprèt gratis.
Karen ကညီ	နကတိ၊ ကညီကျိာ်ဘဉ်စါ. ပကဟ့ဉ်နၤ ပှၤတတိၤကျိာ်ထံတၢ် လၢတဂၤလိဉ်နဟ့ဉ်ဘူးလဲလၢ နကစၢ်အနဉ်နဲဘဉ်နွဉ်လီၤ.
Karenni/Kayah	[illegible]
Korean 한국어	한국어를 사용하십니까? 무료로 통역 서비스를 제공해 드리겠습니다.
Mandarin 中文	您讲普通话吗？我们将免费为您提供翻译。
Nepali नेपाली	के तपाई नेपाली बोल्नुहुन्छ? हामी तपाईका लागि कुनै व्यक्तिगत खर्च बिना एकजना दोभाषे उपलब्ध गराउने छौं।
Polish Polski	Czy mówisz po polsku? Zapewnimy bezpłatną pomoc tłumacza.
Punjabi ਪੰਜਾਬੀ	ਕੀ ਤੁਸੀਂ ਪੰਜਾਬੀ ਬੋਲਦੇ ਹੋ? ਅਸੀਂ ਤੁਹਾਡੇ ਲਈ ਬਿਨਾਂ ਕਿਸੇ ਨਿੱਜੀ ਲਾਗਤ ਦੇ ਇੱਕ ਦੁਭਾਸ਼ੀਆ ਉਪਲਬਧ ਕਰਾਂਗੇ।
Russian Русский	Вы говорите по-русски? Мы абсолютно бесплатно предоставим вам переводчика.
Somali Af Soomaali	Maku hadashaa Af Soomaali? Waxaan kuu heli karnaa tujumaan oo bilaash kuu ah.
Spanish Español	¿Habla español? Le proporcionaremos un intérprete sin costo alguno para usted.
Swahili Kiswahili	Je, unazungumza Kiswahili? Tutakupa mkalimani bila malipo yoyote.
Vietnamese Tiếng Việt	Quý vị nói được tiếng Việt không? Chúng tôi sẽ cung cấp một thông dịch viên miễn phí cho quý vị.
American Sign Language (ASL)	

cyracom INTERNATIONAL INC. VOIANCE

Tennessee Relay (711)

Although it is best practice to use an in-person interpreter for sign language interpretation, it may be necessary to contact someone via phone using the appropriate numbers below.



Taglines

Another way to provide notices is through use of taglines on printed and electronic materials. Taglines are short sentences written in the individual's language notifying them of their right to language assistance, free of charge.

ENGLISH

Please let us know if you need interpreter services that are available to you at no cost. All authorized interpreters for the Metro Public Health Department (MPHD) have completed HIPAA privacy training and are required to comply with the privacy rules of MPHD.
We will also provide free oral translation of documents that have not already been translated in written form.

SPANISH

Por favor, infórmenos si necesita del servicio de interpretación que se encuentra disponible para usted y sin costo alguno. Además, ofrecemos servicio gratuito de traducción oral de documentos que aún no están traducidos por escrito. Todos los intérpretes autorizados del departamento metropolitano de salud pública (MPHD) han completado una capacitación sobre privacidad en el marco de la ley de portabilidad y responsabilidad del seguro de salud (HIPAA, por sus siglas en inglés) y se les exige acatar las normas sobre privacidad del MPHD.

ARABIC

يرجى إعلامنا إذا كنت بحاجة إلى خدمات الترجمة الفورية المتاحة لك مجاناً. جميع المترجمين المفوضين في قسم مترو للصحة العامة أكملوا تدريب الخصوصية المعروف باسم هيبا . وهم مطالبون بالامتثال لقواعد الخصوصية الخاصة بقطاع مترو للصحة العامة.
كما سنوفر ترجمة شفهية مجانية للوثائق التي لم تتم ترجمتها بالفعل في صيغة مكتوبة.

BURMESE

သင့်အတွက် အခမဲ့ ရရှိနိုင်သည့် စကားပြန် ဝန်ဆောင်မှုများကို
လိုအပ်ခဲ့ပါက ကျေးဇူးပြု၍ ကျွန်ုပ်တို့အား အသိပေးပါ။ မက်ထရို ပြည်သူ့ကျန်းမာရေး
ဌာန (MPHD) အတွက် ခွင့်ပြုချက်ရှိ ထားသည့် စကားပြန်များ အားလုံးသည် HIPAA
သီးသန့်တည်ဝှိမှု သင်တန်းကို တက်ရောက်ရရှိခဲ့ပြီးဖြစ်ပြီး MPHD ၏
သီးသန့်တည်ဝှိမှုဆိုင်ရာ စည်းမျဉ်းစည်းကမ်းများအတိုင်း လိုက်နာလုပ်ဆောင်ရန်
လိုအပ်သည်။
စာဖြင့် ရေးသားပြီး ဘာသာပြန်ထားခြင်း မပြုရသေးသည့် စာရွက်စာတမ်းများကို
နှုတ်အားဖြင့် ဘာသာပြန်ပေးခြင်း ကိုလည်း ကျွန်ုပ်တို့ အခမဲ့ ပံ့ပိုးပေးပါသည်။

SWAHILI

Tafadhali tufahamishe kama unahitaji huduma za ukalimani ambazo zinapatikana kwako bila gharama yoyote. Wakalimani wote walioidhinishwa wa Idara ya Afya ya Umma ya Mjini (MPHD) wamekamilisha mafunzo ya faragha ya HIPAA na wanahitajika kutii kanuni za faragha za MPHD.
Tutatoa pia tafsiri ya bila malipo ya nyaraka ambazo hazijatafsiriwa tayari kwa kuandikwa.

NEPALI

तपाईलाई तपाईको लागि नि: शुल्क रूपमा उपलब्ध हुने दोभाषे सेवाहरूको आवश्यकता पर्छ भने कृपया हामीलाई थाहा दिनुहोस्। मेट्रो सार्वजनिक स्वास्थ्य विभाग (MPHD) का सबै आधिकारिक दोभाषेहरूले HIPAA गोपनीयता प्रशिक्षण पूरा गर्नुभएको छ र उहाँहरूले MPHD का गोपनीयता नियमहरूको अनुपालना गर्न आवश्यक हुन्छ।
हामीले पहिले नै लिखित रूपमा अनुवाद नगरिएका कागजातहरूको नि: शुल्क मौखिक अनुवादन पनि उपलब्ध गराउँछौं।

Metro Public Health Dept

Additional resources can be found on the MPHD intranet under Interpreter Services.

Metro Public Health Dept
Nashville / Davidson County
Protecting, Improving, and Sustaining Health

QUALIFIED INTERPRETER SERVICES POLICY

Policy Name:	**Qualified Interpreter Services**		
Category:	**Client/Patient Services**		
Effective Date	**July 2019**	**Last Reissue/Revision Date: July 2019**	
Responsible Program or Bureau:	**Human Resources**		**Review-By Date: July 2022**
Contact:	**Program Supervisor**		**Phone Number: 615.340.8963**

I. Policy Summary

Qualified Interpreter Services are provided during all hours of operation at no cost to customers and their companions in accordance with federal laws, including Section 1557 of the Patient Protection and Affordable Care Act (PPACA), and Title VI of the Civil Rights Act of 1964. Section 1557 prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. Covered entities are prohibited from relying on unqualified staff when providing language assistance services. Title VI prohibits discrimination based on race, color, or national origin in programs or activities which receive federal funding. The law also requires that customers be told they have a right to receive interpreter services, including sign language, and how to address and file complaints pertaining to interpreter services. An ability to speak the patient's language does not necessarily qualify an individual to interpret medical discussions.

II. Policy

Qualified Interpreter services will be provided to Limited English Proficient individuals during regular MPHD business hours. No individual will be denied services based on an inability to speak English. Interpreter services must be appropriate to the situation.

III. Definitions

- Certified Medical Interpreter or Certified Healthcare Interpreter (CMI/CHI) – An individual who holds certification from the National Board of Certification for Medical Interpreters or from the Certification Commission for Healthcare Interpreters. A CHI/CMI is able to interpret effectively, accurately, and impartially, using any necessary specialized vocabulary. All CHI/CMIs will adhere

to continuing education requirements, as stipulated in the job description, and to the national standards of practice and code of ethics for interpreters in healthcare.

- Qualified Interpreter (QI) – An individual who is able to interpret effectively, accurately, and impartially, using any necessary specialized vocabulary. All interpreters employed by MPHD have successfully passed an interpreter skills assessment administered by an approved vendor and are therefore considered to be Qualified Interpreters. All Qualified Interpreters will adhere to continuing education requirements, as stipulated in the job description, and to the national standards of practice and code of ethics for interpreters in healthcare.

- Qualified Bilingual Employee (QBE) – An individual who can communicate in a language other than English and who has successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed.

- Bilingual Employee – An MPHD employee who speaks two languages. Bilingual employees can use their language skills to interact with customers/patients on their own behalf, but shall not provide interpretation or translation services.

- Non-medical encounter - An interaction between a customer and MPHD staff member that is not for the purpose(s) of providing healthcare service(s) or assessing the healthcare status of a customer.

- Medical encounter – An interaction between a patient and healthcare provider(s) for the purpose of providing healthcare service(s) or assessing the healthcare status of a patient.

- Contract Interpreter – A Qualified Interpreter employed by one of MPHD's approved vendors.

- Point of contact – An instance where a customer/patient accesses services, either in person or via telephone.

- Interpreting – The facilitation of spoken or signed language communication between users of different languages.

- Translation – A written rendering of one language into another; written interpretation.

IV. <u>Available Interpreter Services</u>:

<u>1. Medical Encounter Interpreting Services</u>

- Interpreting on-site or over-the-phone, for medical personnel
  - Consecutive mode (*when the interpreter listens to what the speaker is saying, and conveys the message into another language after the speaker has paused*) during medical encounters
  - Simultaneous mode (*when the interpreter listens to what the speaker is saying while concurrently saying it in another language*), when appropriate
- Sight translation of medical documents

NOTE: Only the services of Qualified Interpreters competent in medical terminology in both the source and target language are used during medical encounters.

<u>2. Non-Medical Encounter Interpreting Services</u>

- Interpreting on-site or over-the-phone, for non-medical personnel
  - Consecutive mode during non-medical encounters
  - Simultaneous mode, when appropriate
- Assistance with appointment scheduling

- Assistance with following up on phone calls or messages in language other than English; monolingual, non-English assistance

NOTE: Non-medical encounters may use the services of either Qualified Interpreters (QIs) or Qualified Bilingual Employees (QBEs).

Types of Qualified Interpreters available:

- Certified Medical Interpreter (CMI) or Certified Healthcare Interpreter (CHI)
- Qualified Interpreter (QI)
- Contract Interpreter (in person, telephone)

The specific method for providing interpreter services for a particular point of contact depends on the nature of the encounter as well as the readily available services in the language needed. A Spoken Language Assistance graph in the *Procedure* section below will aid in the determination of the best mode of interpretation assistance per encounter type.

Face-to-face/on-site Interpreter or Contract Vendor Interpreters: When the communication required is lengthy, complex, critical, sensitive in nature, involves visual cues and/or requires specialty medical interpreting.

Telephone Interpreter Services: For shorter routine conversations that need immediate access to a spoken language interpreter and visual cues are not necessary.

Sight translation of documents used during customer/patient visits may be provided in person, through qualified spoken/sign language assistance, or, as appropriate, through a telephone interpreter service.

All individuals providing Qualified Interpreter services to customers and patients are bound by the professional interpreter code of ethics, which requires interpreters to maintain confidentiality, comply with the Health Insurance Portability and Accountability Act (HIPAA), and adhere to all existing federal or state laws. The National Code of Ethics for Interpreters in Health Care established by the National Council on Interpreting in Health Care states that "the interpreter treats as confidential, within the treating team, all information learned in the performance of their professional duties, while observing relevant requirements regarding disclosure."

V. Procedure

1. Any customer/patient who expresses a preference for a non-English language or has demonstrated a need for interpreter services shall be offered the use of a Qualified Interpreter at all administrative and clinical points of contact during all hours of operation at no charge to the customer/patient. The offer of Qualified Interpreter services is made even in a situation where a customer/patient is accompanied by a companion who may be capable of interpreting for the customer/patient. If language assistance is needed after regular business hours, MPHD staff can use the services of the approved over-the-phone language vendors. Please contact HR if you need information on how to contact the approved language vendors.

2. Posted notices of the availability of free language assistance services include the contact information for our Title VI Coordinator where customers/patients may inquire and/or file complaints about how MPHD delivers language assistance services.

3. The reliance on adult family members, companions, and/or friends as interpreters is inappropriate. However, the customer/patient has the right to refuse the interpreter services we offer; such refusal must be documented. A Qualified Interpreter may be asked to monitor the encounter to ensure full comprehension by all parties and promote patient autonomy.

4. Occasionally, the sensitive nature of a patient's clinical condition may cause providers or staff to request Qualified Interpreter services to participate in the encounter despite the patient's preference to use an adult family member or a friend. In such situations, the circumstances leading to the override of the patient's preference are documented in the medical record, as applicable.

5. Minor children shall not be used as interpreters except in extraordinary situations such as medical emergencies where any delay could result in harm to a customer/patient, and only until a Qualified Interpreter is available. Use of a minor child for interpretation under these circumstances should be documented in the medical record, as applicable.

6. The use of language apps or other electronic translation devices is inappropriate as they are unprofessional and unreliable forms of translation.

7. Customers/Patients shall not be asked to bring their own interpreter to an administrative or clinical point of contact.

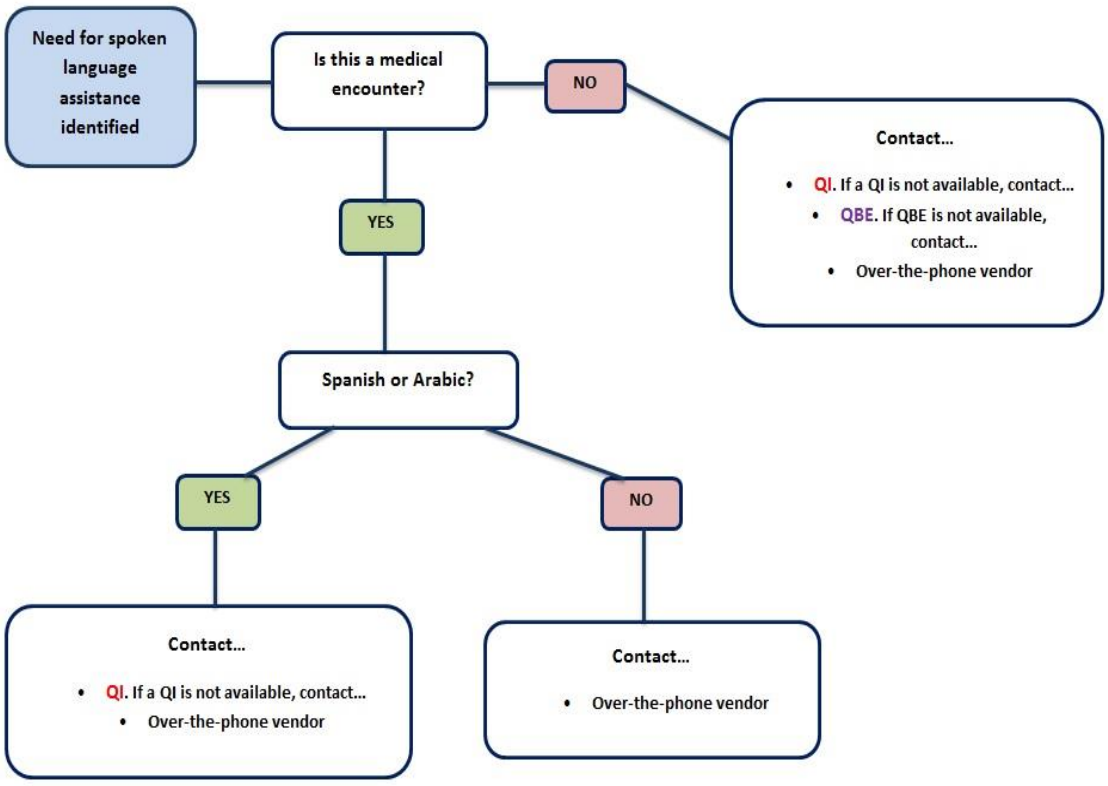
8. Deaf and hard of hearing customers/patients have a right to Qualified Interpreter services to ensure effective communication. Please contact Human Resources to request and schedule an ASL interpreter.

9. Bilingual employees are not Qualified Interpreters and therefore cannot provide Qualified Interpreter services.

VI. Applicability

This policy applies to all MPHD employees and contractors.

VII. Spoken Language Assistance Graphic



Please contact Human Resources via email to submit requests for an on-site interpreter.

For written translation requests, please email requests to: InterpreterServices@nashville.gov

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Historical Commission Year: 2026

Title VI Coordinator: Summers, Dustin Form Completed By: Summers, Dustin

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via posted information in common area/on HR notice board.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Via posted information in common area/on HR notice board.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Due to the small size/nature of our department's operations, we rarely/never have Title VI matters to address. Employees will be trained on a case-by-case basis, if needed with any information and/or materials to be translated into the needed/required language by department's Title VI Coordinator.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

MHC is not participating in such committees currently.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Human Relations Commission Year: 2026

Title VI Coordinator: Gavin Crowell-Williamson Form Completed By: Daniel Yoon

Form Completion Date: 7/8/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

In-person and written materials. **All requested materials/attachments herein may be found on our website.**

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

In-person and email.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Online, flyer, email, social media and in-person.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 80

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	All complaints are available on request.
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Human Resources Year: 2026

Title VI Coordinator: Erica Conn Form Completed By: Erica Conn

Form Completion Date: 5/19/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Online

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Verbally at a monthly department meeting, with follow-up information/coaching available through our Workforce Culture and Employee Relations divisions.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Department breakroom and website

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes, for the HR department ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

LIMITED ENGLISH PROFICIENCY (LEP) DEPARTMENT LANGUAGE ACCESS PLAN

METROPOLITAN GOVERNMENT OF NASHVILLE & DAVIDSON COUNTY HUMAN RESOURCES DEPARTMENT

The Metropolitan Government of Nashville and Davidson County (Metro) Human Resources (HR) department will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our opportunities, services, activities, and programs. The practice of Metro is to ensure meaningful communication with persons who experience LEP and their authorized representatives, as well as providing for communication of information contained in vital documents. Metro HR will provide all interpreters, translators, and other aids needed to comply with this policy without cost to persons accessing services.

Metro Human Relations and Finance departments have provided Metro Human Resources with a list of companies Metro has contracted with to provide oral and written translation services.
HR has selected *LanguageLine Solutions* as our department's preferred vendor.

FOR LANGUAGE INTERPRETIVE SERVICE:

If not immediately identifiable, use the *Language Identification Guide* to identify the language for interpretation (See *Language Identification Guide*); and contact our contracted service provider: *LanguageLine Services*: call 1-800-878-8523 and follow the voice command prompts, which will include a request to provide an account number and an access code. If the employee does not know the appropriate account number and access code, the person should contact one of the individuals below for the information.

Stephen Cain, HR Assistant Director 615-862-6464
Razel Jones, HR Assistant Director 615-862-6162
Joslyn McGaughy, HR Workforce Culture Manager 615-862-6403
Erica Conn, HR Title VI Coordinator, 615-862-6640 x 72232

FOR DOCUMENT TRANSLATION & OTHER QUESTIONS:

Contact one of the above colleagues for assistance with accessing document translation services and other questions related to the Language Access Plan.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Information Technology Services (ITS) Year: 2026

Title VI Coordinator: Leslie Ervin Form Completed By: Leslie Ervin

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Included in Employee Handbook which each new employee is required to read and sign acknowledgement upon completion.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No (out of town during May 2026 training; will attend October 2026 training)

How does your department disseminate Title VI information (including your language access plan) to all employees?

Provide posters in visible areas where employees gather, include in Employee Handbook, and post on internal SharePoint under policies and resources.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted: Information Technology Services Title VI Policy | Nashville.gov

Do you provide this in languages other than English?

☑ Yes (the site can translate page to nearly 80 languages) ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes (the site can translate page to nearly 80 languages) ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY **ITS DEPARTMENTAL POLICY**	POLICY NUMBER: **ITSTVI001**
SUBJECT: TITLE VI NON-DISCRIMINATION COMPLIANCE	DISTRIBUTION DATE: 05/13/2024
	EFFECTIVE DATE: 05/01/2024
ISSUING AUTHORITY: CIO/Director of Information Technology Services of the Metropolitan Government of Nashville and Davidson County	EXPIRATION: UNTIL RESCINDED

1.0 PURPOSE

It is the policy of Information Technology Services of the Metropolitan Government of Nashville and Davidson County (Information Technology Services) to ensure compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 26. Title VI 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 financial assistance." Title VI covers all agencies receiving federal funds. Some examples include: student aid, employee training, grants, loans, tax incentives, and technical assistance. Title VI applies to discrimination throughout this agency, not just actions involving federally assisted programs.

2.0 EMPLOYEES AFFECTED

All employees of Information Technology Services are expected to consider, respect, and observe this policy in daily work and duties. If a citizen approaches with a question, employees will direct the citizen to the Information Technology Services Title VI Coordinator.

Title VI Coordinator Contact Information
Leslie Ervin, IS Advisor
Information Technology Services
700 President Ronald Reagan Way, Suite 301
Nashville, TN 37219
615-862-6297

3.0 POLICY

The ITSTVI001 Policy stipulates the following:

It shall be against the policy of Information Technology Services as part of the Metropolitan Government of Nashville and Davidson County to discriminate against an individual based upon that person's race, color, or national origin.

4.0 GUIDELINES

Information Technology Services is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

4.1 BASIC GUIDELINES

4.1.1 Title VI Information Dissemination

Title VI information posters shall be prominently displayed in Information Technology Services administrative office and Data Center located at 700 President Ronald Reagan Way, Suite 301, Nashville, TN 37219. Title VI information posters will also be published in the internal Information Technology Services employee Policies intranet site as well as the Information Technology Services internet page on www.nashville.gov accessible by the public.

During new employee education, new employees shall be informed of the provisions of Title VI and Information Technology's expectations to perform their duties in the Employee Handbook.

All employees shall have access to the Title VI Plan via the employee intranet.

4.1.2 Subcontract and Vendors

All subcontractors and vendors who receive payments from Information Technology Services where funding originates from federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or indirectly through the bid specification package which becomes an associated component of the contract.

4.1.3 Record Keeping

Information Technology Services will maintain permanent records, which include, but are not limited to, signed acknowledgements of receive from the employees indicating the receipt of the Information Technology Services' Title VI Plan, copies of the Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

4.1.4 How to File a Complaint

A complainant may file a signed, written complaint up to 180 days from the date of the alleged discrimination. The complaint must include the following information:

- Name of the individual filing the complaint, mailing address, and contact information (i.e., telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against, including the location, names, and contact information of any witnesses.
- Other information deemed significant.

The Title VI Complaint may be made with the Metro Human Relations Commission the following ways:

- via online form Title VI Compliance Program Form
- Call 615-880-3370 to schedule an appointment for assistance with filing a complaint
- Visit in person at 150 2nd Avenue North, Human Relations Commission, Suite 217, Nashville, TN 37201
- Email MHRC at MHRC@nashville.gov for questions or to submit complaints.

4.2 LIMITED ENGLISH PROFICIENCY PLAN

Information Technology Services has a Limited English Proficiency Plan based on the following four factors that defines what action the agency will take when someone is identified with a limited English proficiency (see Appendix C):

- Number or proportion of limited English proficiency (LEP) persons eligible to be served or likely to be encountered by the program.
- Frequency with which LEP individuals come in contact with the program.
- Nature and importance of the program, activity, or services provided.
- Resources available to recipient and costs

5.0 REVISION HISTORY

REVISION	APPROVAL DATE	CHANGES
1.0	05/01/2024	First released version
2.0	05/21/2025	Updated contact information for filing a complaint with MHRC

SIGNATURE



Keith Durbin
Chief Information Officer/Director of ITS
Metropolitan Government of Nashville and Davidson County

REFERENCES
Federal Transit Administration Circular 4702.1.B



Limited English Proficiency Plan

INFORMATION TECHNOLOGY SERVICES

MAY 2024

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INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the Metropolitan Government of Nashville and Davidson County Information Technology Services (ITS) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

PLAN SUMMARY

ITS has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

The mission of ITS is to lead the delivery of exceptional technology, service, and solutions. This mission is accomplished by delivering equitable technology solutions, resilient and secure infrastructures, and actionable data insights that help Metro Government enhance the lives and experiences of residents and visitors. Our digital inclusion goals exist to ensure everyone can access, afford, and use technology to achieve all the benefits it can offer. ITS recognizes that providing meaningful language access is a critical function toward building digital equity.

ITS has a plan based on the Four Factor Analysis that defines what action and reasonable steps the department will take when someone is identified with a limited English proficiency (LEP).

FACTOR 1: Number or Proportion of LEP Persons Eligible to be Served or Likely Encountered by the Program

According to the 2023 Census Data (source), estimated Davidson County had a total population of 663,438 residents. Among them, 70,039 individuals (approximately **10.06%**) reported speaking English "less than very well" and are classified as LEP. Spanish (64%), Arabic (9%), and Other Asian and Pacific Island (8%) speakers constitute the largest LEP populations in Davidson County.[i]

FACTOR 2: Frequency with Which LEP Individuals Come in Contact with the Program

ITS staff reviewed the frequency with which office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, ITS has had no requests for interpreters and no requests for translated program documents. ITS office staff have had very little contact with LEP persons.

FACTOR 3: The Nature and Importance of the Program, Activity, or Services Provided

Technology touches every part of daily life. We use technology to learn, work, obtain social and healthcare services, and maintain contact with loved ones. In their *Healthy People 2030* agenda, the U.S. Department of Health and Human Services talks about "the conditions in the environments where people are born, live, learn, work, play, worship, and age." These conditions are known as Social Determinants of Health because they play a part in long-term health outcomes.[ii] Because technology is an underpinning to these factors, it plays a major role in the quality of a person's life. Our digital inclusion goals exist to make sure that everyone can access, afford, and use technology to achieve all the benefits that it can offer and achieve the best health outcomes possible.[iii]

For non-English speakers, having access to a translation service facilitates effective communication and enables individuals to maximize the benefits and opportunities of technology. ITS Staff is most likely to encounter LEP individuals through phone conversations and written correspondence.

FACTOR 4: The Resources Available to Recipient and Costs

ITS relies on telephonic interpretation and document translation service through Language Line Solutions with over 20,000 interpreters speaking 240+ languages including the languages most often spoken by Davidson County LEP residents.

Pricing varies by activity however the 2024 pricing for telephonic interpretation is $1.05 per minute with the cost being absorbed by ITS and not passed along to the public.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the digital inclusion services. Language assistance can include interpretation, which means oral or spoken

transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

There is a relatively low percentage of LEP individuals, that is, persons who speak English "not well" or "not at all," however ITS will strive to offer the following measures:

1. ITS staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

2. Language interpretation and translation service will be accessed for 240+ languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire.
- Description of language assistance services offered to the public; in person and telephone
- Documentation of language assistance requests

TRANSLATION OF DOCUMENTS

ITS evaluated the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the small local LEP population, ITS does not have a formal outreach procedure in place. However, when and if the need arises for LEP outreach, ITS will consider the following option. When staff prepares a document, advertisement, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

ITS will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in Davidson County.

Updates will include:

- Determination of the current LEP population in Davidson County.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether ITS's financial resources are sufficient to fund language assistance resources needed.
- Determine whether ITS fully complies with the goals of this LEP Plan.

DISSEMINATION OF ITS LEP PLAN

ITS will provide an internet hyperlink on www.nashville.gov notifying LEP persons of the LEP Plan and how to access language services on applications and contracts.

Revision History

Version Number	Date	Changes
1.0	05/01/24	Initial Published Plan
2.0	05/23/24	Grammatical corrections & location of internet link for public.
3.0	05/15/25	Updated Davidson County Census Statistics

[i] Source: US Census Bureau (2023). Detailed Household Language by Household Limited English Speaking Status. American Community Survey, ACS 5-Year Estimated Detailed Tables, Table B16002. US Census Bureau (2023). Language Spoken at Home. American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601.

[ii] Healthy People 2030, U.S. Department of Health and Human Services, Office of Disease Prevention and Health Promotion. Retrieved [date graphic was accessed], from https://health.gov/healthypeople/objectives-and-data/social-determinants-health

iii Sieck CJ, Sheon A, Ancker JS, Castek J, Callahan B, Siefer A. Digital inclusion as a social determinant of health. NPJ Digit Med. 2021 Mar 17;4(1):52. doi: 10.1038/s41746-021-00413-8. PMID: 33731887; PMCID: PMC7969595. From Digital inclusion as a social determinant of health - PubMed (nih.gov)

LanguageLine Solutions®

Quick Reference Guide

Metro Gov't - ITS Dept

HOW TO ACCESS AN INTERPRETER

1. DIAL: **866-874-3972**
2. PROVIDE: **705310**
3. INDICATE: the language you need
4. PROVIDE: additional information, if required.

Document the interpreter name and ID number for your reference.
Brief the interpreter and give any special instructions.

IMPORTANT INFORMATION:

WORKING WITH AN INTERPRETER - At the beginning of the call, interpreters identify themselves by name and ID number. Note this information for reference. Then tell the interpreter the nature of the call. Speak directly to the limited English proficient or Deaf or Hard of Hearing individual, not to the interpreter, pausing at the end of a complete thought. To ensure accuracy, your interpreter may ask for clarification or repetition.

3-WAY CALL – INITIATING/RECEIVING A CALL - Use the conference feature on your phone and follow the instructions provided to connect to an interpreter. If you are initiating the call, get the interpreter on the line first, then call the limited English proficient individual. If you are receiving a call, ask the caller to "Please Hold," and then conference in the interpreter.

PHONE INTERPRETING EQUIPMENT - If you have interpreting equipment, use one handset to call into LanguageLine, once connected to the interpreter, give the second handset to the limited English proficient individual.

CUSTOMER SERVICE - To provide feedback, commend an interpreter, or report any service concerns, visit www.LanguageLine.com and click on the "Client Resources" tab, scroll to "Voice of the Customer" and complete the form.

LEARN MORE Visit www.LanguageLine.com or call 1-800-752-6096 for more information on our language access solutions.

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1 Starting the Session

- Allow the interpreter to start the session by giving you their name and Interpreter ID. Document this information for reference.
- Introduce yourself to the interpreter.
- Brief the interpreter: state the goal of the session and provide any specific instructions.
- Introduce yourself and the interpreter to the limited English proficient, Deaf, or Hard of Hearing individual.

2 During the Session

- Address the limited English proficient, Deaf, or Hard of Hearing individual, not the interpreter. The interpreter will be your voice. Keep in mind that everything stated will be interpreted.
- State information in short, concise sentences. When stating complicated or detailed information, speak at a slow pace and pause often. This allows the interpreter to note, retain, and relay the information. The interpreter may ask for repetitions or clarification.
- Avoid technical jargon and explain specialized terms or concepts.
- Avoid interrupting the interpreter or talking at the same time.
- Do not ask the interpreter for their opinion.

3 Ending the Session

- Ask the limited English proficient, Deaf, or Hard of Hearing individual if they understood, or if they have any questions or concerns.
- Allow the interpreter to interpret everything before ending the session.

For more information:

Contact your Account Executive or CustomerCare@LanguageLine.com / 1-800-752-6096

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Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Internal Audit Year: 2026

Title VI Coordinator: Bill Walker Form Completed By: Bill Walker

Form Completion Date: 7/8/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☐ Yes ☑ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other NA

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Title VI does not apply to our office as we do not receive federal funds. Please let us know if this is not correct.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Justice Integration Services Year: 2026

Title VI Coordinator: Brandi Kyle Form Completed By: Brandi Kyle

Form Completion Date: 6/5/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Title VI training is discussed verbally as part of the New Hire process.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Yearly Annual report posted to the JIS website. -SharePoint in development.

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Using the survey it has been determined that our department does not require one at this time.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Juvenile Court Year: 2026

Title VI Coordinator: Jessica L. Robertson Form Completed By: Jessica L. Robertson

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Training for Title VI is delivered by having staff watch a brief video, review a PowerPoint presentation, and complete a short survey covering the information presented in both materials.

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Title VI information is shared through periodic staff training and flyers posted in common areas. Details about the Language Access Plan are provided in the Employee Enhancement Manual and reinforced through occasional email updates when revisions occur.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Information is posted within the building and on the Juvenile Court website.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Information on the court's website can be translated via browser settings.

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Recipients may complete online training and submit interim and annual reports to the Grant Coordinators.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☑ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
Allen, Paula	Caucasian/White
Anthony, Adam	African American/Black
Bonnyman, Claudia	Caucasian/White
Bowers, Tinita	African American/Black
Brandes, Teresa	Asian
Brazelton, Jewel	African American/Black
Broadwater, Deborah	African American/Black
Caldwell, Constance	African American/Black
Cantrell, Valerie	Caucasian/White
Chamberlain, Clementine	African American/Black
Cunningham, Tamieka	African American/Black
Dardy, Karen	African American/Black
Daughty, Susan	Caucasian/White
Deandrea, Alicia	Caucasian/White
Gish, Susan	Caucasian/White
Goldsmith, Karen	Caucasian/White
Grafton, Laurie	Caucasian/White
Hampton, Carlatina	African American/Black
Merna Hanna	Other/Unknown
Hill, Amy	Caucasian/White
Carol Hornberger	Caucasian/White
Serveen Johnson	African American/Black
Johnston, Mary	Caucasian/White
Kemp, Max	Caucasian/White
Kimbrough, Erica	African American/Black
Kuhlman, Maggie	Caucasian/White
Lee, Cynthia	African American/Black
Lee, Rebecca	Caucasian/White
Lyford, Rebecca	Caucasian/White
Maumus, Isabelle	Caucasian/White
McDonald, Claire	Caucasian/White
McKinley, Mafia	African American/Black
McNamee, Barbara	Caucasian/White
Nixon, Joan	African American/Black
Orr, Carolyn	Caucasian/White
Parker, Julia	African American/Black
Parra, Jessica	Caucasian/White
Parsons, Eileen	Caucasian/White
Peacock, Sandra	Caucasian/White
Phillips, Libby	Caucasian/White
Raketic, Milena	Caucasian/White

Raulston, Gilbert	Caucasian/White
Julia Redwig	Caucasian/White
Eppiphanie Richardson	African American/Black
Rochelle, Sandra	Caucasian/White
Rotella, Julie	Caucasian/White
Schafly, Carol	Caucasian/White
Shackleford, Kara	Caucasian/White
Jacquelyn Smith	African American/Black
Targino, Vanessa	Hispanic/Latino
Terrell, Kimberly	African American/Black
Thomas, Per	Caucasian/White
Thurman, Misty	Caucasian/White
Triplett, Carla	Caucasian/White
Tucker, Carla	African American/Black
Turner-Friley, Sharon	African American/Black
Vastano, Darlene	Caucasian/White
Viventi, Jane	Unknown/Not Specified
West, Anne	Caucasian/White
Whitfield, Zanira	African American/Black
Williams, Melissa	Caucasian/White
Williams, Robert	African American/Black
Wilson, Molly	Caucasian/White

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Employees are selected for operational committees that receive local funding based on their job duties and responsibilities. It is not currently known whether these committees receive federal funding.

Volunteers for the Foster Care Review Board are chosen through an online application process. After completing a criminal background check, signing an Oath of Confidentiality, and finishing required training, they are assigned to review boards to hear cases. Individuals are recruited through social media, word of mouth, community events, and college campus employment boards.

Juvenile Court
METROPOLITAN NASHVILLE & DAVIDSON COUNTY

Davidson County Juvenile Court

Limited English Proficiency (LEP)Language Services Program Operations Manual

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PURPOSE OF LIMITED ENGLISH PROFICIENCY PROGRAM MANUAL

The purpose of this manual is to provide information about the operations of the Davidson County Juvenile Court's Limited English Proficiency (LEP) Program, which assists individuals with limited English proficiency in accessing interpretation services.

JUVENILE COURT MISSION STATEMENT

Davidson County Juvenile Court's mission is to prevent problems, promote the positive potential in all people, and pursue fairness and hope.

LANGUAGE SERVICES PROGRAM VISION STATEMENT

The Davidson County Juvenile Court's Language Services Program is committed to providing interpreting and translation services in all necessary languages to ensure that every client has equal access to information and understanding comparable to that of a native English speaker.

LEGAL BASIS FOR LANGUAGE SERVICES

FEDERAL:

- Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S. C. 2000d, (hereinafter Title VI), provides that no person 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. The Department of Justice has created guidance to assist in the development of plans (See attached 67 Fed. Reg. 41, 464 Section VII) and programs to ensure that states are meeting the requirements of Title VI and are taking reasonable steps to ensure meaningful access to their programs and activities by LEP persons" 67 Fed. Reg. 41,459 (June 18, 2002). Prohibits discrimination on the basis of race, color, or national origin, including limited English proficiency.

- Section 504 of the Rehabilitation Act of 1973, as amended, prohibits discrimination on the basis of disability in both employment and the delivery of services or benefits by recipients of federal financial assistance.

- Title II of the Americans with Disabilities Act (ADA), as amended, prohibits discrimination on the basis of disability in both employment and the delivery of services or benefits by public entities. It applies to all state and local government agencies and offers protections similar to Section 504. Title II of the ADA applies to all state and local government agencies, whether or not they receive Federal financial assistance.

- 28CFR42.104(b)(2) requires all recipients of Federal financial assistance from DOJ to provide meaningful access to LEP persons.

STATE OF TENNESSEE:

- Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

- Tennessee Supreme Court Rule 42: Standards for Court Interpreters. *This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the*

judicial system. This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand the English language.

- T. C. A.[1]§24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings.

- Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000).[2]

PROGRAM BENEFITS

The Juvenile Court Language Access Services Program ensures that individuals who are Deaf, hard of hearing, blind, or have limited English proficiency—meaning they do not speak English as their primary language or have limited ability to read, speak, write, or understand it—receive meaningful access to vital documents and interpretation services at no cost.

GRIEVANCE PROCEDURES

A complaint regarding the inadequate provision of language assistance may be made in person, by email, or by phone to the Juvenile Court Administrator (ADA Coordinator) or Title VI Coordinator.

To make a complaint by phone, call (615) 862-8000 to speak with the Juvenile Court Administrator (ADA Coordinator) or the Juvenile Court Title VI Coordinator.

Address written complaints to the Juvenile Court Administrator (ADA Coordinator) or the Juvenile Court Title VI Coordinator.

100 Woodland Street
PO Box 196306
Nashville, Tn 37219

Complaints may also be made to Metro Human Relations Commission by email: mhrc@nashville.gov

VITAL DOCUMENTS

Vital documents will be routinely reviewed.

DEMOGRAPHIC HIGHLIGHT

In 2024, the Davidson County Juvenile Court provided interpretation services to 1,449 individuals across 23 languages. Spanish was the most frequently requested language, followed by Arabic.

[1] Rule 41: States in part…*Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier.*

[2] Executive order 13166: Improving Access to Services for Persons with Limited English Proficiency states in part… *recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.*

ROLES OF INTERPRETER COORDINATOR

Roles of the certified Davidson County Juvenile Court Language Services Coordinator include the following:

- Provide interpreting services for the courts, petitioners, respondents, witnesses, attorneys, and other parties during court appearances, attorney-client meetings, and other communications by order of the Judicial Officers.
- Provide translations of court orders, procedures, attorney and client letters, statements, etc., related to court cases.
- Coordinate and facilitate the provision of language access services for Languages Other Than Spanish (LOTS) and Spanish where there is a need for more than one Spanish interpreter at a time. This includes locating interpreters for LOTS and, in cases where travel is needed, helping coordinate approval and travel of the interpreters.
- Provide and remind Juvenile Court employees and attorneys about the procedures to request language services.

CODE OF ETHICS FOR COURT INTERPRETERS

All certified and registered interpreters are tested on ethics for court interpreters through a credentialing process. Regardless of an interpreter's credentials, all court interpreters are expected to be familial with and follow the Code of Ethics as listed in Supreme Court Rule 41. (*See* Appendix).

LANGUAGE ASSISTANCE SERVICES

The Davidson County Juvenile Court is responsible for taking reasonable steps to ensure that LEP individuals have meaningful access to services outside the courtroom. These services range from translation, interpretation, and interactions with bilingual staff. The Davidson County Juvenile Court has the following resources to help LEP individuals and court employees communicate with each other:

- The Davidson County Juvenile Court has "I Speak Cards" for use. This information is available on the AOC website at this address: https://tncourts.gov/programs/court-interpreters

- The Davidson County Juvenile Court has "Right to Interpreter" posters for use. This information is available on the AOC website at this address: https://tncourts.gov/programs/court-interpreters

Interpretation

Interpretation is the unrehearsed transmission of a spoken message from one language to another. This type of interpretation may be done using an in-person interpreter, over-the-phone (OPI) Metro vendor, or by using video remote interpreting. The first step is to identify the language that is being spoken. Staff that has contact with the public should contact bilingual staff or use the "I Speak" cards found at: https://tncourts.gov/programs/court-interpreters to obtain assistance for LEP persons needing language assistance. The "I Speak" pages are posted at the reception desk in the courthouse. Employees have access to language access lines. Interpreter requests are submitted electronically to the official Juvenile Court Interpreter Group email: JuvenileCourtInterpreterRequests@jisnashville.gov.

Auxiliary Aids are provided at no additional cost to individuals with disabilities, where necessary, to ensure effective communication with individuals with hearing, vision or speech impairments. Auxiliary aids may include, but are not

limited to, services or devices such as: qualified interpreters on-site or through video remote interpreting (VRI) services, note takers, assistive listening devices, television captioning and decoders, telecommunication products and systems, qualified readers, taped texts, Brailled materials, and large print materials.

Translation

The term "translate" refers to the process of transmitting the written word from one language to another. The court shall determine if it is reasonably necessary for documents to be translated as part of assuring adequate representation of an indigent party with LEP. Many forms have may have already been translated and can be found on the AOC website.

https://www.tncourts.gov/programs/court-interpreters
http://www.tncourts.gov/programs/self-help-center/what-should-i-expect-court-video
www.LEP.gov.
https://www.nashville.gov/departments/human-relations/title-vi-metro-government/limited-english-proficiency

Bilingual Staff

Bilingual staff can speak directly to the LEP person in their language. Bilingual staff can be helpful for communication at the clerk's counter or with security personnel. Court employees may be available to voluntarily assist in interpreting should a LEP individual require assistance. These employees may offer their services only if it does not interfere with their primary job duties and does not require a language level superior to their own. These employees are only permitted to provide legal assistance, not legal advice.

The following employees are bilingual and provide interpretation services for Spanish needs:

- Davidson Morales, Juvenile Court Language Services Coordinator.
- Veronica Carrasco, Juvenile Court Language Services Interpreter.

TRAINING PROGRAMS FOR STAFF, JUDGES AND OTHERS

The Administrative Office of the Courts for the State of Tennessee (AOC) continues to provide education programs and materials on the AOC interpreter program and online serves at clerks and judicial conferences. During the conferences, the AOC highlights the need for courts and clerks' offices to assist in this education and recruitment process. As needed, email blasts and communications on interpreter issues are sent to court staff from the Language Services Coordinator. In addition, The Metropolitan Government of Nashville and Davidson County Human Relations Commission and the Administrative Officer of the Courts (AOC) for the State of Tennessee has Title VI training available on-line with testing materials for courts to take advantage of this training. AOC Title VI information can be found on the AOC's Human Resources webpage at this address:

http://tncourts.gov/administration/human-resources/title-vi-title-ix

A short online video hosted by the AOC can be watched by staff called "Breaking Down the Language Barrier," a video training tool provided by the Department of Justice." http://www.youtube.com/watch?v=qaVKy-2HWIo&feature=related

The Juvenile Court Training Coordinator manages Title VI compliance for staff. Title VI training occurs upon hire and three years thereafter. Training frequency also follows grant requirements.

The Juvenile Court Title VI Coordinator provides online Title VI training to staff when compliance is due.

APPOINTING AN INTERPRETER

Supreme Court Rule 42

Tennessee Supreme Court Rule 42 Section 3 dictates that appointing an interpreter is a matter of judicial discretion and that it is the responsibility of the court to determine whether a participant in a legal proceeding has a limited ability to understand and communicate in English. The court shall appoint an interpreter according to the preference listed below:

1. State certified court interpreter
2. State registered court interpreter
3. Non-credentialed court interpreter

Finding a Credentialed Court Interpreter

If the court needs to appoint an interpreter, the AOC has posted all credentialed interpreters on its website at this address: https://www.tncourts.gov/programs/court-interpreters/find-court-interpreter. Interpreter services are scheduled as determined by local rules or at the direction of the court.

DAVIDSON COUNTY JUVENILE COURT LANGUAGE SERVICES COORDINATOR

David Morales, CCI
Language Services Coordinator
Juvenile Court
100 Woodland St.
Nashville, TN 37213
T +1 (615) 862-8064
C +1 (615) 490-5968
DavidMorales@jisnashville.gov
juvenilecourt.nashville.gov

STATE CONTACT

The Tennessee Judicial System is committed to providing accurate and impartial interpreting services to court users who need language assistance. Questions relating to interpreters may be directed to the Tennessee Office of the Courts.

Ryan Mouser
Language Access Program Manager
Administrative Office of the Courts
Nashville City Center, Suite 600
511 Union Street
Nashville, Tennessee 37219
(615) 741-26847
(800) 4484-7970

Ryan.mouser@tncourts.gov

CIVIL RIGHTS DIVISION CONTACT

Civil Rights Division

(202)514-3847
Telephone Device for the Deaf (TTY) (202) 514-0716

LEP PROGRAM GOALS, OBJECTIVES, AND ACTIVITIES

Program success is defined by the following goals, objectives, and activities. These inform strategic planning and program improvements.

Goal: 100% of LEP clients will receive LEP Language Services as identified.

Objective 1.1: Schedule interpreting and translation services.

Activity 1.1: Provided needed interpreting and translation services.

PROGRAM OUTPUTS

Program outputs are products of program activities and process measures that provide indicators of implementation.

1. Number of interpretations provided.
2. Type and number of language services provided.

PROGRAM OUTCOME MEASURES

Used to measure achievement of objectives and progress toward goals.

PROGRAM REPORTS

Reporting is issued for the Interpreter Services program.

Reporting includes the following:

a) Data summaries.
b) Outcome measures.
c) Demographic characteristics of involved families:
    a) Language service required
        i. Deaf, hard-of-hearing
        ii. Blind
        iii. LEP
    b) Zip code.

EVALUATION

This operations manual is reviewed annually by the Appointed Authority or authorized designee.

APPENDIX

JUVENILE COURT DEPARTMENTAL POLICY 2.23.1 LIMITED ENGLISH PROFICIENCY ACCESS

Juvenile Court METROPOLITAN NASHVILLE & DAVIDSON COUNTY	Chapter Departmental Business Practices	Title 2.23.1: Limited English Proficiency Access	Effective Date 07/01/2018
Appointing Authority Sheila D.J. Calloway, Judge	Approved Date 07/01/2018 Approved By Sheila D Calloway	Related Standards Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts; T.C.A.§24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings; Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Person with Limited English Proficiency; Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000)	Revised Date 8/06/2025 Supersedes 2.23

PURPOSE

To ensure equitable access to services and programs for individuals with Limited English Proficiency (LEP) by providing timely and appropriate interpretation services.

DEFINITIONS

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority is usually vested in a Department Head unless otherwise delegated. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Authorized Designee: The person in a chain of command having departmental authority, as appointed, and authorized by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Director/Supervisor.

Consecutive Interpretation: Providing the target-language message after the speaker has finished speaking a sentence or phrase.

Deaf Person: A person with a hearing loss so great as to prevent such person from understanding language spoken in a normal tone. "Deaf person" further includes, but is not limited to, a person who is mute and a person who is both deaf and mute.

Interpretation: Spoken rendition based on an individual's oral account. The result is the oral rendition in the target language.

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

Oral Interpreter: A person who interprets language through facial and lip movements only and who does not use manual communication.

Qualified Deaf Interpreter: An interpreter certified by the National Registry of Interpreters for the Deaf, Tennessee Registry of Interpreters for the Deaf, or, in the event an interpreter so certified is not available, an interpreter whose qualifications are otherwise determined. Efforts to obtain the services of a qualified interpreter certified with a Legal Skills Certificate or a Comprehensive Skills Certificate will be made prior to accepting services of an interpreter with lesser certification.

Sight Translation: Oral translation of a written text.

Simultaneous Interpretation: Providing rendition of the target-language message at approximately the same time the source-language message is being produced.

Source Language: The input language requiring interpretation.

Standard Operating Procedure (SOP): Instructions created by Juvenile Court to assist employees in carrying out team operations.

Supervisor: The person in an employee's chain of command having the departmental authority to direct the employee's work, to approve or deny leave requests, to conduct the employee's performance evaluations, and to counsel, correct, and recommend disciplinary action or termination of employment.

Target Language**: T**he output language into which the utterance is being interpreted.

Tennessee Code Annotated §24-1-211: An oral interpreter shall be provided upon the request of a deaf person who does not communicate in sign language. The right of a deaf person to an interpreter may not be waived except by a deaf person who does not use sign language and who initiates such request for waiver in writing. Such waiver is subject to approval of counsel to such deaf person, if existent, and is subject to approval of the appointing authority.

POLICY SCOPE

This policy applies to employees and non-employees (Interns, volunteers, contractors, partners). Failure to comply with this policy by non-employees may result in their removal from the program. Failure to comply with this policy by employees may result in disciplinary action, up to and including termination of employment.

POLICY

It is the policy of Juvenile Court to provide free interpretation services to all Limited English Proficiency (LEP) clients, including deaf and hard of hearing, to ensure meaningful access to information, programs, and services in compliance with *Title VI of the Civil Rights Act of 1964* and all applicable federal, state, and local regulations. Providing meaningful access may entail providing language assistance services, including telephone interpreter lines, bilingual staff and volunteers, oral interpretation services, and written language services. Qualified interpreters shall be used, either in person, by phone, or by video remote interpretation. Hearings requiring interpreters shall not use family members of parties to a case. Family members, friends, or minors must not be used as interpreters except in emergencies. Interpretation will be provided in the language requested by the LEP client whenever possible. Clients requiring interpretation services may waive their right to an interpreter. Refusal of interpretation services by a client shall be documented. Individuals will have access to language lines for interpretation services. A non-credentialed interpreter may be appointed upon a finding that diligent, good faith efforts to obtain the certified or registered interpreter have been made and none has been found to be reasonably available. If a language is not listed on the court roster, services of a non-credentialed interpreter may be used.

PROCEDURES

1. INCORPORATION OF STANDARDS

1.1 Incorporation Herein:

1. Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.
2. T.C. A.§24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings.
3. Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Person with Limited English Proficiency.
4. Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000).

2. ACCURATE AND COMPLETE INTERPRETATIONS

2.1 Interpreter Responsibility:

1. Interpreters must adhere to Tennessee Supreme Court Rule 41 as a duty to ensure that the proceedings in English reflect precisely what was said by the LEP person, and to place the LEP person on an equal footing with those who understand and speak English.

3. IDENTIFICATION OF LEP CLIENTS

3.1 Individual Responsibility:

1. Individuals must make reasonable efforts to identify individuals who may have limited ability to speak, read, write, or understand English and who may require language assistance.

4. AVAILABILITY AND NOTICE

4.1 Administrative Responsibility:

1. Signs in the most spoken languages in the service area shall be posted in public-facing areas to inform clients of their right to free interpretation services.

5. INTERPRETER REQUEST

5.1 Individual Responsibility:

1. Individuals must submit interpreter requests electronically to the Juvenile Court Interpreter Group email as soon as reasonably possible.

6. LEP DATA

6.1 LEP Program Coordinator Responsibility:

1. The LEP Program Coordinator shall maintain LEP data that comports to AOC, grant, local, state, and federal standards.

7. MONITORING AND COMPLIANCE

7.1 Administrative Responsibility:

1. Supervisors will be responsible for ensuring their direct employees and non-employees comply with this policy.

REVIEW

This policy will be reviewed as needed by the Appointing Authority or authorized designee.

FORMS

Interpreter Request Form (electronic) under Juvenile Court share point.

RULE 41: RULES OF ETHICS FOR SPOKEN FOREIGN LANGUAGE INTERPRETERS IN TENNESSEE COURTS

Preamble
Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency ("LEP"). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier. As officers of the court, interpreters help assure that such persons may enjoy equal access to justice and that court proceedings and court support services function efficiently and effectively. Interpreters are highly skilled professionals who fulfill an essential role in the administration of justice.

Applicability and Enforcement
This code shall guide and be binding upon all persons, agencies and organizations who administer, supervise use, deliver, or attempt to become credentialed to deliver spoken foreign language interpreting services to the judicial system. The Canons and any subparts are mandatory upon persons who are bound by this code. The commentary is not mandatory and exists to provide guidance in interpreting the code. Interpreters for the deaf and hard of hearing are not covered by this code. See Tenn. Code Ann. § 24-1-211 regarding guidelines for such interpreters.

Violations of this code may result in the interpreter being removed from a case, being denied future appointments by the courts, losing credentials if the interpreter has been credentialed pursuant to the rules of the Supreme Court, or any other sanctions deemed appropriate by the Administrative Director of the Courts.

The Administrative Director of the Courts is authorized to adopt policies and procedures necessary to enforce the code.

Terminology
(1) **Consecutive Interpretation** - providing the target-language message after the speaker has finished speaking.

(2) **Sight Translation** - oral translation of a written text.

(3) **Simultaneous Interpretation** - providing the target-language message at approximately the same time the source-language message is being produced.

(4) **Source Language** - the input language requiring interpretation.

(5) **Target Language** - the output language into which the utterance is being interpreted.

CANON 1. Accuracy and Completeness
Interpreters shall render a complete and accurate interpretation or translation without altering, omitting, or adding anything to what is stated or written, and without explanation.

A. The interpreter has a twofold duty: 1) to ensure that the proceedings in English reflect precisely what was said by the LEP person, and 2) to place the LEP person on an equal footing with those who understand and speak English. This creates an obligation to conserve every element of information contained in a source language communication when it is rendered in the target language.
B. The obligation to preserve accuracy includes the interpreter's duty to correct any error of interpretation discovered by the interpreter during the proceeding. Interpreters shall demonstrate their professionalism by

objectively analyzing any challenge to their performance.

Commentary.
Interpreters are obligated to apply their best skills and judgment to preserve faithfully the meaning of what is said in court, including the style or register of speech. Verbatim, "word for word," or literal oral interpretations are not appropriate when they distort the meaning of the source language, but every spoken statement, even if it appears non-responsive, obscene, rambling, or incoherent should be interpreted. This includes apparent misstatements.

Interpreters should never interject their own words, phrases, or expressions. If the need arises to explain an interpreting problem (e.g., a term or phrase with no direct equivalent in the target language or a misunderstanding that only the interpreter can clarify), the interpreter should ask the court's permission to provide an explanation. Interpreters should convey the emotional emphasis of the speaker without reenacting or mimicking the speaker's emotions or dramatic gestures.

CANON 2. Representation of Qualifications
Interpreters shall accurately and completely represent and document their credentials, training, and pertinent experience, and make such documentation available to each and every court to be maintained on file by such court, if desired.

Commentary.
Acceptance of a case by an interpreter is a representation to the court of linguistic competency in legal settings. Withdrawing or being asked to withdraw from a case after it begins causes a disruption of court proceedings and is wasteful of scarce public resources. It is therefore essential that interpreters present a complete and truthful account of their training, credentials and experience prior to appointment so the officers of the court can fairly evaluate their qualifications for delivering interpreting services.

The Administrative Office of the Courts distributes photo identification cards to all state certified and registered interpreters. A court can determine an interpreter's credentialing status by viewing this card, which differentiates between registered and certified interpreters, and by consulting the credentialed interpreter roster, which can be found on the AOC's website (www.tncourts.gov).

CANON 3. Impartiality and Avoidance of Conflict of Interest
Interpreters shall be impartial and unbiased and shall refrain from conduct that may give an appearance of bias. Interpreters shall disclose any real or perceived conflict of interest.

A. Any condition that interferes with the objectivity of an interpreter constitutes a conflict of interest. Before providing services in a matter, court interpreters shall disclose to all parties and presiding officials any prior involvement, whether personal or professional, that could be reasonably construed as a conflict of interest. Such disclosure(s) shall include, but not be limited to, the fact that the interpreter has previously been retained by one of the parties for private employment. Such disclosure(s) shall not include privileged or confidential information.

B. Whenever an interpreter has an actual or apparent conflict of interest, the interpreter shall declare in open

court before appointment such conflict and the court shall determine whether the interpreter may serve in the case. Situations, including but not limited to the following, shall be presumed to create an actual or apparent conflict of interest:

(1) The interpreter is a friend, associate, or relative of a party or counsel for a party involved in the proceedings;

(2) The interpreter has served in an investigative capacity for any party involved in the case;

(3) The interpreter has previously been retained by a law enforcement agency or any party to assist in the preparation of the case at issue;

(4) The interpreter or the interpreter's spouse or child has a financial interest in the subject matter in controversy or is a party to the proceeding, or any other interest that would be affected by the outcome of the case;

(5) The interpreter has been involved in the choice of counsel or law firm for that case; or

(6) Any other situation in which the interpreter thinks his or her impartiality may be questioned or compromised.

C. Interpreters shall not serve in any matter in which payment for their services is contingent upon the outcome of the case.

Commentary.
The interpreter serves as an officer of the court and the interpreter's duty in a court proceeding is to serve the court and the public to which the court is a servant. This is true regardless of whether the interpreter is publicly retained at government expense or retained privately at the expense of one of the parties. Although an interpreter must disclose the fact that the interpreter interpreted for a party during out-of-court meetings, interviews, or other proceedings in the case at issue, ethical considerations do not preclude the interpreter from serving as the interpreter for multiple parties or for both the court and one or more parties in that case.

An individual who is, or may become, a witness is not permitted to serve as an interpreter in that same matter.

During the course of the proceedings, interpreters should not converse with parties, witnesses, jurors, attorneys, or with friends or relatives of any party, except in the discharge of their official functions. It is especially important that interpreters, who are often familiar with attorneys or other members of the courtroom work group, including law enforcement officers, refrain from casual and personal conversations with anyone in court that may convey an appearance of a special relationship or partiality to any of the court participants.

The interpreter should strive for professional detachment. Verbal and non-verbal displays of personal attitudes, prejudices, emotions, or opinions should be avoided at all times.

An interpreter who is also an attorney should not serve in both capacities in the same matter.

CANON 4. Professional Demeanor
Interpreters shall conduct themselves in a manner consistent with the dignity of the court and shall be as unobtrusive as possible.

Commentary.
Interpreters should know and observe the established protocol, rules, and procedures for delivering interpreting services. When interpreting testimony or making comments to be included in the record, interpreters should speak at a rate and volume that enable them to be heard and understood throughout the courtroom, but the interpreter's presence should otherwise be as unobtrusive as possible. Interpreters should work without drawing undue or inappropriate attention to themselves. Interpreters should dress in a manner that is consistent with the dignity of the proceedings of the court. Interpreters should avoid obstructing the view of any of the individuals involved in the proceedings.

Interpreters are encouraged to avoid personal or professional conduct that could discredit the court.

CANON 5. Confidentiality
Interpreters shall protect the confidentiality of all privileged and other confidential information.

Commentary.
The interpreter must protect and uphold the confidentiality of all privileged information obtained during the course of her or his duties. It is especially important that the interpreter understands and upholds the attorney-client privilege, which requires confidentiality with respect to any communication between attorney and client. It is equally important for the interpreter to be aware that when the attorney is not present, there is no attorney-client privilege and the interpreter may be held to divulge any information gained. The interpreter, therefore, must avoid any such situation. This rule also applies to other types of privileged communications.

Interpreters must also refrain from repeating or disclosing information obtained by them in the course of their employment that may be relevant to the legal proceeding.

In the event that an interpreter becomes aware of information that suggests the threat of imminent harm to someone or relates to a crime being committed during the course of the proceedings, the interpreter should immediately disclose the information to an appropriate authority within the judicial system and seek advice in regard to the potential conflict in professional responsibility.

CANON 6. Restriction of Public Comment
Interpreters shall not publicly discuss, report, or offer an opinion concerning a matter in which they are engaged, even when that information is not privileged or required by law to be confidential.

CANON 7. Scope of Practice
Interpreters shall limit themselves to interpreting or translating, and shall not give legal advice, express personal opinions to individuals for whom they are interpreting, or engage in any other activities which may be construed to constitute a service other than interpreting or translating while serving as an interpreter.

Commentary.
Since interpreters are responsible only for enabling others to communicate, they should limit themselves to the activity of interpreting or translating only. Interpreters should refrain from initiating communications while interpreting at all times except as set out below.

Interpreters may be required to initiate communications during a proceeding when they find it necessary to seek assistance in performing their duties. Examples of such circumstances include seeking direction when unable to understand or express a word or thought, requesting speakers to moderate their rate of communication or repeat or rephrase something, correcting their own interpreting errors, or notifying the court of reservations about their ability to satisfy an assignment competently. In such instances they should refer to themselves in the third person as "the interpreter," making it clear and on the record that they are speaking for themselves.

At no time can an interpreter give advice, but an interpreter may interpret legal advice from an attorney to any party while that attorney is giving it. An interpreter should not explain the purpose of forms, services, or otherwise act as counselors or advisors. The interpreter may translate language on a form in the presence of an attorney or authorized legal personnel for a person who is filling out the form, but may not explain the form or its purpose for such a person.

The interpreter should not personally serve to perform official acts that are the official responsibility of other court officials including, but not limited to, court clerks, pretrial release investigators or interviewers, or probation officers, except as required by and in the presence of such officials.

CANON 8. Assessing and Reporting Impediments to Performance
Interpreters shall familiarize themselves as thoroughly as possible with the nature and length of a proceeding beforehand, to assess their ability to deliver adequate services. When interpreters have any reservation about their ability to satisfy an assignment competently, they shall immediately convey that reservation to the appropriate judicial authority even when the proceeding is in progress.

Commentary.
If the communication mode or language of the LEP person cannot be readily interpreted, the interpreter should notify the appropriate judicial authority.

Interpreters should notify the appropriate judicial authority of any environmental or physical limitation that impedes or hinders their ability to deliver interpreting services adequately (e.g., the court room is not quiet enough for the interpreter to hear or be heard by the LEP speaker, more than one person at a time is speaking, or principals or witnesses of the court are speaking at a rate of speed that is too rapid for the interpreter to adequately interpret).

Interpreters should notify the presiding officer of the need to take periodic breaks to maintain mental and physical alertness and prevent interpreter fatigue. Interpreters should recommend and encourage the use of team interpreting whenever necessary, such as trials, complex and technical proceedings, proceedings over two hours in length and testimony lasting one hour or more (keeping in mind that the consecutive interpreting mode doubles

the length of time of the testimony). See the commentary to Section 3 of Tennessee Supreme Court Rule 42 for additional information.

Interpreters are encouraged to make inquiries as to the nature of a case whenever possible before accepting an assignment. This enables interpreters to match more closely their professional qualifications, skills, and experience to potential assignments and more accurately assess their ability to satisfy those assignments competently.

Even competent and experienced interpreters may encounter cases where routine proceedings suddenly involve technical or specialized terminology unfamiliar to the interpreter (e.g., the unscheduled testimony of an expert witness). When such instances occur, interpreters should request a brief recess to familiarize themselves with the subject matter. If familiarity with the terminology requires extensive time or more intensive research, interpreters should inform the presiding officer.

Interpreters should refrain from accepting a case if they feel the language and subject matter of that case is likely to exceed their skills or capacities. Interpreters should feel no compunction about notifying the court if they feel unable to perform competently due to lack of familiarity with terminology, preparation, or difficulty in understanding a witness or defendant. Court personnel and parties are encouraged to provide interpreters with copies of all documents referred to in a proceeding, such as witness lists, indictment, exhibit lists, criminal complaint, investigative reports, tape transcripts, telephone logs and bank records.

Interpreters should notify the court of any personal bias they may have involving any aspect of the proceedings. For example, an interpreter who has been the victim of a sexual assault may wish to be excused from interpreting in cases involving similar offenses.

CANON 9. Misconduct

An interpreter shall not commit a criminal act that reflects adversely on the interpreter's honesty, trustworthiness, or fitness as an interpreter in other respects. Likewise, an interpreter shall not engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

Commentary.

This language is intended to put interpreters on notice that inappropriate conduct before, during, and after successful completion of the credentialing process may have professional ramifications. The conduct at issue includes, but is not limited to, inappropriate behavior in which an interpreter engages during one or more of the required credentialing examinations.

CANON 10. Duty to Report Ethical Violations

Interpreters shall report to the proper judicial authority any effort to impede their compliance with any law, any provision of this code, or any other official policy governing court interpreting and legal translating.

Commentary.

Because the users of interpreting services frequently misunderstand the proper role of the interpreter, they may

ask or expect the interpreter to perform duties or engage in activities that run counter to the provisions of this code or other laws, regulations, specific instructions from the bench, or policies governing court interpreters. It is incumbent upon the interpreter to inform such persons of his or her professional obligations. If, having been apprised of these obligations, the person persists in demanding that the interpreter violate them, the interpreter should request the judge or appropriate official with jurisdiction over interpreter matters to resolve the situation.

CANON 11. Professional Development
Interpreters shall continually improve their skills and knowledge and advance the profession through activities such as professional training and education, and interaction with colleagues and specialists in related fields.

Commentary.
Interpreters must continually strive to increase their knowledge of the languages in which they professionally interpret, including past and current trends in technical, vernacular, and regional terminology as well as their application within court proceedings.

Interpreters should keep informed of all statutes, rules of courts and policies of the judicial system that relate to the performance of their professional duties.

An interpreter should seek to elevate the standards of the profession through participation in workshops, professional meetings, interaction with colleagues, and reading current literature in the field.

CANON 12. Pro Bono Publico Service.
Interpreters should aspire to render a reasonable amount of pro bono publico interpretive services per year. In fulfilling this responsibility, interpreters should:
(a) provide a substantial portion of such services without fee or expectation of fee to persons of limited means; or

(b) provide interpretive services at a substantially reduced fee to persons of limited means.

Commentary.
Personal involvement in the problems of the disadvantaged can be a rewarding experience in the life of an interpreter. This Canon urges all interpreters to provide a reasonable number of hours of pro bono service annually.

Under paragraph (a), service must be provided without fee or expectation of fee. The intent of the interpreter to render free services is essential for the work performed to fall within the meaning of paragraph (a); accordingly, services rendered cannot be considered pro bono if an anticipated fee is uncollected. Paragraph (b) permits the pro bono interpreter to accept a substantially reduced fee for services to persons of limited means; again, however, the intent of the interpreter to render reduced-fee services is essential for the work performed to fall within the meaning of paragraph (b); accordingly, services rendered cannot be considered pro bono if an anticipated fee is uncollected.

Because this Canon states an aspiration rather than a mandatory ethical duty, it is not intended to be enforced through disciplinary process.

[Adopted by order filed April 25, 2002; amended by order filed April 27, 2005; and amended by order filed December 16, 2011, effective July 1, 2012.]

RULE 42: STANDARDS FOR COURT INTERPRETERS

Section 1. Scope
This rule, except where noted, shall apply to all courts in this state, including without limitation, municipal court, general sessions court, juvenile court, probate court, circuit court, chancery court, criminal court, and appellate court.

Commentary
This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak, and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the judicial system.

This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand the English language.

Section 2. Definitions
(1) State Certified Court Interpreter - an interpreter who possesses the qualifications outlined in Section 5(b) of this rule.

(2) State Registered Court Interpreter - an interpreter who possesses the qualifications outlined in Section 5(a) of this rule.

(3) Interpretation - the unrehearsed transmission of a spoken message from one language to another.

(4) Limited English Proficient ("LEP") Person - a participant in a legal proceeding who has limited ability to speak or understand the English language.

(5) Non-Credentialed Interpreter - a court interpreter who is not certified or registered as provided in this rule.

(6) Participant - a party, witness, or other person in a legal proceeding.

(7) Sight Translation - oral translation of a written text.

(8) Written Translation - the rendering of a written document from one language into a written document in another language.

(9) Audio or Video Transcription and Translation - written transcription of the entire verbal content and translation of the non-English verbal content of an audio or video recording.

(10) Court Proceedings - any hearing, trial, or other appearance before any Tennessee general sessions court, or municipal court exercising general sessions jurisdiction, or any juvenile, probate, circuit, chancery, criminal, or appellate court, in an action, appeal, or other proceeding, including any matter conducted by a judicial magistrate.

(11) Indigent Party - a party found by a court to be indigent pursuant to the provisions of Tennessee Code Annotated section 40- 14-202 or other applicable statute, which finding shall be evidenced by a court order.

Section 3. Determining Need for Interpretation

(a) Appointing an interpreter is a matter of judicial discretion. It is the responsibility of the court to determine whether a participant in a legal proceeding has a limited ability to understand and communicate in English. If the court determines that a participant has such limited ability, the court should appoint an interpreter pursuant to this rule.

(b) Recognition of the need for an interpreter may arise from a request by a party or counsel, the court's own voir dire of a party or witness, or disclosures made to the court by parties, counsel, court employees or other persons familiar with the ability of the person to understand and communicate in English.

(c) The court shall appoint an interpreter according to the preference listed below:

1. State certified court interpreter;

2. State registered court interpreter;

3. Non-credentialed court interpreter.

(d) The court may appoint an interpreter of lesser preference (i.e., registered instead of certified or non-credentialed instead of registered) only upon a finding that diligent, good faith efforts to obtain the certified or registered interpreter, as the case may be, have been made and none has been found to be reasonably available. A non-credentialed interpreter may be appointed only after the court has evaluated the totality of the circumstances including the gravity of the judicial proceeding and the potential penalty or consequence involved.

(e) Before appointing a non-credentialed interpreter, the court shall make the following findings:

(i) that the proposed interpreter appears to have adequate language skills, knowledge of interpreting techniques, familiarity with interpreting in a court setting; and

(ii) that the proposed interpreter has read, understands, and will abide by the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

(f) A summary of the efforts made to obtain a certified or registered interpreter and to determine the capabilities of the proposed non-credentialed interpreter should be made in open court.

(g) The court shall use the services of multiple interpreters where necessary to aid interpretation of court proceedings.

Commentary.
The Administrative Office of the Courts distributes photo identification cards to all state certified and registered interpreters. A court can determine an interpreter' s credentialing status by viewing this card, which differentiates between registered and certified interpreters, and by consulting the credentialed interpreter roster, which can be found on the AOC' s website (www.tncourts.gov).

Section 3(g). The court may wish to consider using multiple interpreters in legal proceedings where one or more of the following situations exist:

(1) Legal proceedings lasting more than 2 hours--Generally, in legal proceedings lasting more than two hours a team of two interpreters should be designated to ensure the accuracy and completeness of the record by allowing interpreters to alternate work and rest in short shifts, thus avoiding fatigue. Although it may not be necessary to use multiple interpreters for short hearings, studies have shown that interpreters' accuracy rates greatly decrease after 20-30 minutes of continuous interpretation. Therefore, courts should be aware that interpreters may need breaks during relatively short hearings.

(2) Multiple defendants--One or more interpreters may be appointed (apart from the interpreter(s) who are interpreting the legal proceedings) in order to provide interpreting services for attorney-client communications during the proceeding. However, courts should be aware that ethical considerations do not preclude interpreters from facilitating in-court and out-of-court communication for both the court and one or more parties in the same proceeding. Moreover, the Administrative Office of the Courts has provided many courts with simultaneous interpreting equipment, which will allow one interpreter to interpret for multiple defendants during a single proceeding.

See the commentary to Canon 8 of Tennessee Supreme Court Rule 41 for additional information regarding circumstances in which it may be advisable to use multiple interpreters.

Section 4. Procedures
(a) Scheduling Interpreter Services. - Interpreter services will be scheduled as determined by local rules or at the direction of the court.

(b) Waiver of Interpreter. - The LEP participant may at any point in the proceeding waive the services of an interpreter. The waiver of the interpreter's services must be knowing and voluntary, and with the approval of the court. Granting such waiver is a matter of judicial discretion, subject to the procedural requirements of section 4(b)(1).

(1) *Waiver Procedure*.

(i) Before approving the waiver, the judge, in open court, must first explain to the LEP person through an interpreter the nature and effect of the waiver; and

(ii) the judge must determine in open court that the waiver has been made knowingly, intelligently, and voluntarily.

(iii) If the LEP person is the defendant in a criminal matter, the court must further determine that the defendant has been afforded the opportunity to consult with his or her attorney.

(2) At any point in any proceeding, for good cause shown, the LEP person may retract his or her waiver and request an interpreter.

(c) Interpreter Oath. All interpreters, before commencing their duties, shall take an oath that they will make a true and impartial interpretation using their best skills and judgment in accordance with the standards and ethics of the interpreter profession. The court shall use the following oath:

"Do you solemnly swear or affirm that you will interpret accurately, completely and impartially, using your best skill and judgment in accordance with the standards prescribed by law and the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts; that you will follow all official guidelines established by this court for legal interpreting or translating, and discharge all of the solemn duties and obligations of legal interpretation and translation?"

Commentary.

Section 4(a). Comment. The person(s) responsible for arranging for the services of the interpreter and making sure the interpreter is available for appointment to provide services for the court hearing(s) shall be left to the local courts to decide. It is recommended that local rules reflect the arrangement process to assist those appearing before the courts.

Section 4(c). Comment 1. It is common practice for interpreter oaths to be sworn to and maintained on file for all interpreters who are regularly employed by a court. This simplifies the court's inquiries in open court during procedural hearings. It is recommended, however, that an oath be read and sworn to in open court in all proceedings conducted before a jury.

Section 4(c). Comment 2. The Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts address the various ethical responsibilities of interpreters for accuracy and completeness, impartiality, confidentiality, and other matters relating to the professional conduct of interpreters. The court should be alerted to potential conflicts of interest or other violations of the Rules of Ethics. The sanction of removal from the case is justified for any violations of the Rules of Ethics. See Tennessee Supreme Court Rule 41 for additional information.

Section 5. State Certified and Registered Court Interpreters

(a) To receive designation as a state registered court interpreter, the candidate shall:

(1) Submit to a criminal background check. Convictions for any felony or for a misdemeanor involving dishonesty or false statement shall disqualify a candidate from certification if such conviction is ten years old or less as provided in Tennessee Rule of Evidence 609;

(2) Attend an approved ethics and skill building workshop;

(3) Pass an approved criterion-referenced written examination;

(4) Provide verification of United States citizenship or the legal right to work and remain in the United States;

(5) Complete any required forms and pay any required fees; and

(6) Complete any additional requirements established by the Administrative Director of the Courts pursuant to subsection (d).

If an oral performance examination is available, a registered court interpreter must sit for the examination at least once every twelve months from the date he/she is designated as a registered court interpreter until he/she receives a passing grade to become a certified court interpreter. Failure to sit for the oral examination as required by this section shall result in the loss of designation as a registered court interpreter and the interpreter shall be required to begin the credentialing process anew.

(b)(1) To receive designation as a state certified court interpreter, the candidate shall:

(i) Successfully meet the requirements to be designated as a state registered court interpreter;

(ii) Pass an approved criterion-referenced oral performance examination; and

(iii) Complete any additional requirements established by the Administrative Director of the Courts pursuant to subsection (d).

(2) Interpreters with certification as a federal court interpreter shall be granted reciprocity as a state certified court interpreter after successfully meeting the requirements of (a)(1), (a)(2), (a)(4), (a)(5), and (a)(6) above. Interpreters with any other type of certification will be reviewed on a case-by-case basis to determine what steps the interpreters must take to be granted state court interpreter certification.

(c)(1) Once credentialed, certified and registered court interpreters shall be required to renew their credentials every three years. The three-year effective period begins on July 1 following the date of credentialing. Renewals are from July 1 of one year to June 30 of the third year for three-year periods.

(2) Renewing credentials requires the following:

(i) Providing documentation of 18 hours of approved continuing education (CE) credits received during the three-year period. A CE credit is equal to one contact hour in the classroom. A minimum of 12 of the 18 hours must consist of foreign language or interpreting skills training. The Administrative Director of the Courts is authorized to adopt policies and procedures necessary to implement this provision of the rule; and

(ii) Completing any required forms and paying any required fees.

(d) The Administrative Director of the Courts shall determine appropriate examination registration fees as well as examination eligibility requirements, requirements for successful completion of examinations, and penalties for unsuccessful completion of examinations. The Administrative Director of the Courts also has the authority to

impose additional requirements for an interpreter to earn, retain, or reinstate status as a registered or certified interpreter. The director is authorized to adopt policies and procedures necessary to implement this provision of the rule.

Commentary.
Comment 1. Court interpretation is a specialized and highly demanding form of interpreting. It requires skills that few bilingual individuals possess, including language instructors. The knowledge and skills of a court interpreter differ substantially from or exceed those required in other interpretation settings, including social service, medical, diplomatic, and conference interpreting. Due to the highly specialized knowledge and skills required in this profession, the Court has promulgated this rule to adopt uniform qualifications for interpreters serving in Tennessee's courts.

Comment 2. A "criterion-referenced" performance examination is one in which the required score is based on an absolute standard rather than one on the relative performance of examinees as measured against one another.

Comment 3. Interpreters are responsible for familiarizing themselves with the credentialing and renewal requirements. For additional information, interpreters should consult the interpreter page of the Administrative Office of the Courts' website, which can be accessed at www.tncourts.gov, or contact the Administrative Office of the Courts.

Section 6. Removal of an Interpreter in Individual Cases
Any of the following actions shall be good cause for a judge to remove an interpreter from a case:

(1) Incompetence;

(2) Being unable to interpret adequately, including where the interpreter self-reports such inability;

(3) Knowingly and willfully making false, misleading, or incomplete interpretation while serving in an official capacity;

(4) Knowingly and willfully disclosing confidential or privileged information obtained while serving in an official capacity;

(5) Misrepresentation of credentials;

(6) Failure to reveal potential conflicts of interest; or

(7) Failing to follow other standards prescribed by law and the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

Commentary.
It is important to recognize that interpreters are sometimes called to court to interpret for someone who speaks a different language or dialect from that spoken by the interpreter. This section authorizes the court to remove

interpreters who are not competent to interpret for this or any other reason, or who violate the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

Section 7. Cost of Interpreter/Translator Services

The reasonable costs associated with an interpreter's and/or translator's services will be compensated when a court finds, upon motion of counsel or on the court's own initiative, that a participant has limited English proficiency ("LEP") The term "interpret" refers to the process of transmitting the spoken word from one language to another. The term "translate" refers to the process of transmitting the written word from one language to another. When it is necessary for a court to utilize the services of an interpreter to determine if an individual is LEP, the AOC will compensate the interpreter for this service. The reasonable costs will be compensated pursuant to this section 7 when a general sessions court, or a municipal court exercising general sessions jurisdiction, or a juvenile, probate, circuit, chancery, criminal, or appellate court, finds, on motion of a party or on the court's own initiative, that a party has limited English proficiency. Reasonable compensation shall be determined by the court in which services are rendered, subject to the limitations in this rule, which limitations are declared to be reasonable.

(a) Rates of Compensation. Compensation rates for services provided by spoken Spanish foreign language interpreters shall not exceed the following: Certified Interpreter - $50 per hour; Registered Interpreter - $40 per hour; Non-Credentialed Interpreter - $25 per hour. Compensation rates for services provided by spoken foreign language interpreters for languages other than Spanish shall not exceed $75 per hour. Compensation for interpreters or translators shall not exceed the following: Certified Interpreter - $500 per day; Registered Interpreter - $400 per day; Non-Credentialed Interpreter - $250 per day. If the court finds that these maximum rates are inadequate to secure the services of a qualified interpreter in a language other than Spanish, the court shall make written findings regarding such inadequacy and determine a reasonable maximum rate for a qualified interpreter. Interpreters shall be compensated for in-court interpretation time and travel time at the compensation rate approved by the court. If the in-court interpretation time and travel time total less than two (2) hours, a minimum of two (2) hours will be compensated for the day.

(b) Translation of Documents. The court shall determine if it is reasonably necessary for documents to be translated as part of assuring adequate representation of an indigent party with LEP. Document translation shall be compensated at a rate of twenty cents ($0.20) per word. If the court finds that this rate is inadequate to secure the services of a qualified translator, the court shall make written findings regarding such inadequacy and determine a reasonable per-word translation rate.

(c) Translation of Audio or Video Media. Services associated with the review or transcription/translation of audio or video tapes that include languages other than English
shall be compensated at the same rate provided for spoken foreign language interpreters in section 7(a) of this rule.

(d) Expenses. The following expenses shall be paid as indicated:

(1) Mileage for travel within the state in accordance with Judicial Department travel regulations, if supported by a log showing the mileage, the purpose of the travel, and the origination and destination cities; however mileage will not be paid for travel from residence office to courthouse within the same county;

(2) Lodging where an overnight stay is required, at actual costs, if supported by a receipt, not to exceed the current authorized executive branch rates;

(3) Meals in accordance with the Judicial Department travel regulations, if supported by a receipt, where an overnight stay is required;

(4) Parking at actual costs up to ten dollars per day, if supported by a receipt.

(5) Time spent traveling shall be compensated at the same rates provided for spoken language interpreters in Section 7(a), except that interpreters compensated at a rate of one hundred dollars ($100) per hour or more shall be compensated for travel time at no greater than fifty percent (50%) of the interpreter's approved hourly rate.

(6) Other expenses not listed in section (d) above, including travel outside the state, will be reimbursed only if prior authorization is obtained from the court.

(e) Prior Approval Required for Services Exceeding $5,000. If the court approves an amount in excess of five thousand dollars ($5,000) for interpreter/translator services, the order(s) and any attachments must be submitted to the director for prior approval. If the director denies prior approval of the request, the claim shall be transmitted to the chief justice for disposition. The determination of the chief justice shall be final.

(f) Claims Procedures. Claims for compensation of interpreters and translators shall be submitted utilizing the system established by the AOC for electronic submission. The interpreter/translator's submission to the AOC must also include a copy of the court's order appointing the interpreter/translator.

(1) Claims that total $200 or more for compensation and expenses shall be reviewed and approved by the judge who presided over the final disposition of the case prior to payment of the claim by the AOC.

(2) Claims that total less than two hundred dollars ($200.00) shall be exempt from the judicial review and approval requirement. Such claims, however, shall be subject to the AOC's examination and audit pursuant to section 7(f)(4).

(3) Time for Submitting Claims. Claims for compensation under this rule shall submitted within 180 days of the day the services were rendered. Claims submitted more than 180 days after the services were rendered shall be deemed waived and shall not be paid.

(4) Examination and Audit by AOC.

(i) The AOC shall examine and audit all claims for compensation and reimbursement to insure compliance with this rule and any other applicable rule or statute(s). The AOC may decline to make any payment should there be a failure to comply with the requirements of this Rule or any other Rule or statutory requirements.

(ii) After such examination and audit, and giving due consideration to state revenues, the director shall make a determination as to the compensation and/or reimbursement to be paid and cause payment to be issued in satisfaction thereof.

(iii) Payment may be made directly to the person, agency, or entity providing the services.

(iv) The determination by the director shall be final, except where review by the chief justice also is required. In those instances, the determination of the chief justice shall be final. The chief justice may designate another justice to perform this function if the chief justice determines that a designation is appropriate or necessary.

(v) If the director denies a fee claim in whole or substantial part, such denial shall be forwarded to the chief justice for review. The determination of the chief justice shall be final. Reductions made during the process of auditing a fee claim which are due to mathematical miscalculations or result from requests for payments not permitted by this rule shall not be forwarded to the chief justice for review.

(vi) The payment of a claim by the AOC shall not prejudice the AOC's right to object to or question any claim or matter in relation thereto. Claims shall be subject to reduction for amounts included in any claim or payment previously made which are determined by the AOC not to constitute proper remuneration for compensable services. The AOC reserves the right to deduct from claims which are or shall become due and payable any amounts which are or shall become due and payable to the AOC.

(g) Contract Services and Pilot Projects. To facilitate the prompt and efficient disposition of proceedings which involve individuals with LEP, the AOC director may contract with interpreters that are credentialed pursuant to this Rule. Courts shall use the contracted interpreters unless they are unavailable. Counties may wish to utilize credentialed interpreters on a full-time or part-time basis with reimbursement for those services from the AOC. The rate of compensation shall not exceed, under any circumstances, the rates provided for in this rule. Counties wishing to be reimbursed for these expenses shall contact the AOC, which will determine in what amounts and by what method said reimbursement shall be made. In addition, the AOC is authorized to establish pilot projects that may include, but are not limited to, video or audio remote interpretation and regional interpretation centers.

(h) Eligible Cases and Covered Proceedings. The following provisions govern the payment of interpreter/translator costs pursuant to this rule.

(1) In cases in which an indigent party has a statutory or constitutional right to appointed counsel as outlined in Supreme Court Rule 13, Section l(d)(l) and (2), interpreter costs will be paid for the following proceedings:

(i) All court hearings;

(ii) Pre-trial conferences between defendants and district attorneys in order to relay a plea offer immediately prior to a court appearance or to discuss a continuance;

(iii) Communication between client and state funded counsel appointed pursuant to Supreme Court Rule 13; and communication between client, state funded counsel and others for the purpose of gathering background information, investigation, trial preparations, and witness interviews.

(2) In cases where a party has a statutory or constitutional right to appointed counsel, as defined in section 7(h)(l), and is not found to be indigent, interpreter costs will only be paid for "court proceedings," as defined in section 2.

(3) If a party does not have a statutory or constitutional right to appointed counsel, interpreter costs will only be paid for "court proceedings," as defined in section 2, and at no time will the AOC pay for the costs of interpreters in the following situations:

(i) Communication with attorneys, prosecutors, or other parties related to a case involving LEP individuals for the purpose of gathering background information, investigation, trial preparation, witness interviews, or client representation at a future proceeding unless pursuant to section 7(h)(l) above;

(ii) Communications relating to probation treatment services;

(iii) Any other communication which is not part of a court proceeding or immediately preceding or following a court proceeding.

(4) Pursuant to Article 1, Section 35 of the Tennessee Constitution, interpreter costs shall be paid pursuant to this rule for services to victim(s) of crime during court proceedings in which the victim(s), or in the case of a homicide, the next-of-kin, are present.

Commentary.

Interested persons should contact the Tennessee Administrative Office of the Courts to determine the circumstances in which interpreter services may be approved and paid for by the Administrative Office of the Courts.

[Adopted by order filed April 25, 2002, amended by order filed April 27, 2005; by orders filed December 16, 2011; June 27, 2012; June 29, 2012, effective July 1, 2012; February 6, 2013, effective July 1, 2013 and as amended by order on December 4, 2015, effective the same.]

GLOSSARY

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Audio or Video Transcription and Translation: Written transcription of the entire verbal content and translation of the non-English verbal content of an audio or video recording.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

Auxiliary Aids: Auxiliary aids include, but are not limited to, services or devices such as: qualified interpreters on-site or through video remote interpreting (VRI) services, note takers, assistive listening devices, television captioning and decoders, telecommunication products and systems, qualified readers, taped texts, Brailled materials, and large print materials.

Bilingual Staff: A staff person who has proficiency in speaking, reading and writing skills in two or more languages.

Client: Any person appearing in court before a judge/magistrate or FCRB board, who does not speak English as their native tongue and requires the services of an interpreter, as well as the judge/magistrate and attorneys involved in the case, and staff involved in the case while in a court setting. This includes home and jail visits, and attorney-client meetings.

Consecutive Interpretation**:** Providing the target-language message after the speaker has finished speaking a sentence or phrase.

Court Proceedings: Any hearing, trial, or other appearance before Juvenile Court.

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.

Deaf Person: A person with a hearing loss so great as to prevent such person from understanding language spoken in a normal tone. "Deaf person" further includes, but is not limited to, a person who is mute and a person who is both deaf and mute.

Individual with a Disability: A person with a physical or mental impairment that substantially limits one or more major life activities. Major life activities include caring for one’s-self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks and learning.

Interpretation: Unrehearsed transmission of a spoken message from one language to another rendition based on an individual’s oral account. The result is the oral rendition in the target language.

Language Services Coordinator: Coordinates interpreter services for Spanish and other languages, to provide all individuals with equal access to court services.

LEP Language Services Program: This program provides direct Spanish interpreter services for Limited English Proficiency (LEP) client, and also coordinates non-Spanish interpreter services. This service is provided in partnership with the Administrative Office of the Court (AOC).

Language Assistance Services: Interpretation services and/or translation services provided by bilingual personnel or interpreter personnel to a limited English Proficient (LEP) individual in his/her primary language to ensure their ability to communicate effectively with agency or agency contractor personnel.

Limited English Proficiency (LEP): A person who cannot speak or understand English as their primary language and who have a limited ability to read, write, speak or understand the English language.

Meaningful Access: Generally involves some combination of oral interpretation services and written translation of vital documents. Meaningful access may entail providing language assistance services, including telephone interpreter lines, bilingual staff and volunteers, oral interpretation services, and written language services.

Oral Interpreter: A person who interprets language through facial and lip movements only and who does not use manual communication.[3]

Qualified Deaf Interpreter: An interpreter certified by the National Registry of Interpreters for the Deaf, Tennessee Registry of Interpreters for the Deaf, or, in the event an interpreter so certified is not available, an interpreter whose qualifications are otherwise determined. Efforts to obtain the services of a qualified interpreter certified with a Legal Skills Certificate or a Comprehensive Skills Certificate will be made prior to accepting services of an interpreter with lesser certification[4].

Section 504 of the Rehabilitation Act of 1973, as amended: Federal law that protects individuals from discrimination based on disability. Under this law, individuals with disabilities may not be excluded from or denied the opportunity to receive benefits and services from certain programs. Section 504 applies to entities that receive financial assistance from any Federal department or agency, including the U.S. Department of Health and Human Services (HHS).

Sight Translation: Oral translation of a written text.

Simultaneous Interpretation: Providing rendition of the target-language message at approximately the same time the source-language message is being produced.

Source Language: The input language requiring interpretation.

Translation: The term "translate" refers to the process of transmitting the written or spoken word from one language to another.

Target Language: **T**he output language into which the utterance is being interpreted.

Tennessee Supreme Court Rule 41: Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier. As officers of the court, interpreter help

[3] Tennessee Code Annotated. §24-1-211*: An oral interpreter shall be provided upon the request of a deaf person who does not communicate in sign language. The right of a deaf person to an interpreter may not be waived except by a deaf person who does not use sign language and who initiates such request for waiver in writing. Such waiver is subject to approval of counsel to such deaf person, if existent, and is subject to approval of the appointing authority.*

[4] Ibid: *No "qualified interpreter" shall be appointed unless the appointing authority and the deaf person make a preliminary determination that the interpreter is able to readily communicate with the deaf person and is able to accurately interpret the statements of the deaf person and interpret the proceedings in which a deaf person may be involved.*

assure that such persons may enjoy equal access to justice and that court proceedings and court support services function efficiently and effectively. Interpreters are highly skilled professionals who fulfill an essential role in the administration of justice.

Tennessee Supreme Court Rule 42: This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak, and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the judicial system. This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand English.

STATEMENT OF ACCESSIBILITY



2025 PROGRAM UPDATE ACKNOWLEDGEMENTS

Program Development Team
David Morale, Juvenile Court Language Services Coordinator
Jessica Robertson, Juvenile Court Title VI Coordinator
Shelley Hudson, Juvenile Court, Special Projects Program Manager

Administrative Review Committee
Jennifer Wade, Juvenile Court Administrator and ADA Coordinator.

Peer Partner Review
Ryan Mouser, Language Access Program Manager, Tennessee Supreme Court, AOC

Produced by
Shelley Hudson, Juvenile Court, Special Projects Program Manager

Approved by
Sheila D. J. Calloway, Juvenile Court Judge

2021 PROGRAM ACKNOWLEDGEMENTS

Program Development Team
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Peer Partner Review
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Ryan Mouser, Language Access Program Manager, Tennessee Supreme Court, AOC

Produced by
Shelley Hudson, Juvenile Court, Special Projects Program Manager

Approved by
Sheila D. J. Calloway, Juvenile Court Judge

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Juvenile Court Clerk Year: 2026

Title VI Coordinator: Kimberly Dillard Form Completed By: Kimberly Dillard

Form Completion Date: 6/12/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Outlined in the Juvenile Court Clerk policy manual and Title VI power point.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No will be attending in the fall.

How does your department disseminate Title VI information (including your language access plan) to all employees?

Outlined in the Juvenile Court Clerk policy manual and Title VI power point.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted: JJC lobby and breakroom

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☑ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The Juvenile Court Clerk office has 3 bilingual employees that assist customers in- person and on the phone. The office also works with the translators with Juvenile Court.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

TITLE VI OF THE 1964 CIVIL RIGHTS ACT



The Law

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 financial assistance."

Applicability

Title VI covers all agencies receiving federal funds. Some examples include: student aid; employee training; grants; loans; property; loans of personnel; tax incentives; and technical assistance. Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or by a third party, within 90 days from the date of the alleged discriminatory act. Complaints should be directed to Kimberly Dillard, 100 Woodland St., Nashville, TN 37213, phone number **(615) 862-7980.**

It shall be against the policy of the Metropolitan Government to discriminate against an individual based upon that person's race, color or national origin.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metro Action Commission (MAC) Year: 2026

Title VI Coordinator: Stephanie Mabry Form Completed By: Stephanie Mabry

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

A PowerPoint presentation containing an embedded Title VI video is sent to all staff members. After viewing the presentation and the video, staff members must sign an acknowledgment form to confirm their completion and understanding. This form is then uploaded to ChildPlus for record-keeping purposes.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Title VI is coordinated by the HR Business Partner/ Title Vi Coordinator. Title VI is viewed for all agency employees. The language access plan is part of the training, posted, and shared with agency employees.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Metropolitan Action Commission HR Department

Employee Break Rooms

Customer Lobby

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

Employee Handbook

SECTION 6.7 — GRIEVANCE PROCEDURE

6.7.1 General

A grievance is defined as an employee's claim that a violation, misinterpretation, misapplication or non-application of a specific rule or policy has adversely affected him.

Complaints alleging discrimination or other violations of applicable EEO laws must be filed as discrimination complaints in accordance with the EEO Complaint Procedure.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 1

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
2/23/2026	Completed	None	No Lawsuit Summary of Findings - Customer did not meet federal eligibility criteria for Rental Assistance
	Select a	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☑ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
Leslie Buggs	Black or African American
Erika Burnett	Black or African American
Michael Cousin	Black or African American
Kanika Covert	Black or African American
Jeff Gregg	White
Topan Byars	Black or African American
Shilan Haji	White
Joseph Mitchell	Black or African American
Renee Pratt	Black or African American
Jeffrey Sheehan	White
Justin Singleton	Black or African American
Indira Dammu	Asian
Jon Michael	White
Terry Vo	Asian
Parv Santhosh-Kumar	Asian
Lori Flemming	Black or African American
Topania Byars	Black or African American
Diana Reado	Black or African American

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

The agency uses a democratic selection process by which agency customers nominate and/or elect persons to represent the community on the board of commissioners.

LANGUAGE ASSISTANCE PLAN

METROPOLITAN ACTION COMMISSION

It is recognized that persons with Limited English Proficiency (LEP) may experience a barrier in receiving benefits under programs offered by the Metropolitan Action Commission (MAC). If language assistance services are not available for these persons, violations of Title VI of the Civil Rights Act of 1964 may occur. To ensure compliance with Title VI, this agency shall adopt the following procedures to ensure that eligible persons with LEP have meaningful access to all services of the Metropolitan Action Commission.

1. All employees will be trained annually on Title VI provisions and serving persons with LEP.

2. Training will be provided for all new employees during their orientation on Title VI provisions and serving persons with LEP.

3. Documentation of all required employee training for language assistance services will be maintained on file.

4. Information has been posted in a conspicuous place at each site to advise that free translation/interpreter services are available.

5. The Metropolitan Government has contracted with the following vendors for interpreter services:

AD Asta, Inc.
(Translation and Interpreter)

Idea Language Services/Idea Translations
(Translation and Interpreter)

Language Line Services
(Translation and Interpreter)

LionBridge Global Solutions
(Translation and Interpreter)

Hearing Bridges
(Interpreter)

Bridges for the Deaf & Hard of Hearing
(ASL Interpreter)

This plan is effective May 11, 2026, and will remain in effect until amended.

Jamekia Bies-Executive Director 4-15-26

NAME AND TITLE OF AUTHORIZED OFFICIAL **DATE**

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metropolitan Clerk Year: 2026

Title VI Coordinator: Austin Kyle Form Completed By: Austin Kyle

Form Completion Date: 7/9/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Power Point

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via email

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

N/A

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

We are actively adding updates to our public facing sites to increase accessibility and language access, however we do not have a formal policy.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Municipal Auditorium Year: 2026

Title VI Coordinator: Taneisha Alexander Harvey Form Completed By: Taneisha Alexander Harvey

Form Completion Date: 7/13/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: NDOT Year: 2026

Title VI Coordinator: Charles Boddie Form Completed By: Robbie Luckett

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Video and In-Person Training for Title VI is provided to all new employees during New Hire Orientation.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Video, In-Person, and On-Line Training for Title VI, Diversity and Inclusion, and Sexual Harassment Prevention are available to all NDOT employees. Additionally, signage for Title VI, Title VII, EEOC, Metro Statement of Non-Discrimination and The Tennessee Human Rights Act posters are visibly posted in all common areas of NDOT building facilities and locations.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

Title VI posters are visibly posted in all common areas of NDOT building facilities and locations:

- NDOT Permit Office, 720 South 5th St, Nashville, TN 37216 Main Announcement Board (Visible to the Public)
- NDOT Engineering Office, Howard Office Building, 700 2nd Ave S, Nashville, TN 37210 - NDOT Employee Break Room
- NDOT Trinity East Building, 943 Dr Richard Adams Dr, Nashville TN 37207 – Main Announcement Board
- NDOT Main Offices, 750 South 5th St, Nashville, TN 37216
    - Administration Building – Employee Break Room and Main Announcement Board (Visible to the Public)

- NDOT Warehouse – On exit door

- NDOT Operations, 740 South 5th St, Nashville, TN 37216
  - Operations Building – Training/Roll Call Room
  - Parking Enforcement Building - Main Announcement Board

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? **0**

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The LEP for NDOT has been written and is awaiting final approval by the NDOT Leadership Team and will then be posted on our department website.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race	Gender

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Office of Emergency Management Year: 2026

Title VI Coordinator: Drusilla Martin Form Completed By: Jamie Summers

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Post on Bulletin boards

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Public lobby and breakroom in building

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Waiting to see if Human Relations puts a plan in place that is consistent across Metropolitan Government of Nashville & Davidson Cty.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: **Office of Family Safety** Year: **2025**

Title VI Coordinator: **LaToya Townsend** Form Completed By: **LaToya Townsend**

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Metro Central HR New Employee Orientation & Training as required by state and federal grants.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Employee Personnel Manual and during staff onboarding

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted

Entrance Lobby, copy areas, break room

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes via Central HR ☐ No

We refer our complaints to Central HR & Metro Legal

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON COUNTY

Metro Office of Family Safety

Where Hope and Healing Begin

LANGUAGE ACCESS GUIDE

For the utilization of OFS Staff ONLY



LTC LANGUAGE SOLUTIONS

VIDEO & TELEPHONE INTERPRETING

1. Visit the following link: https://video.cyracom.com/sign-in
2. Type in Email & Password:
   Email: OFSRemoteAdvocate@jisnashville.gov
   Password: video123
3. Connect with interpreter

You MUST get video interpreter approved by a supervisor, but for regular interpreting (obtained by clicking the microphone button) you may utilize as needed without approval.

VOIANCE

FOR ALL OTHER LANGUAGES INTERPRETATION

1. Dial out number → 1-844-541-3961
2. Use Account # → 26169
3. Enter Pin → 4834
4. If you want a specific gender for interpreter – instead of pressing the number for the languages, press “0” and let them know the gender and language you need.

MAYA INTERPRETERS

FOR CENTRAL/SOUTH AMERICAN INDIGENUOUS LANGUAGES

1. Dial out number → 1-855-629-2872
2. Provide Account Number → MC400730

✳ Whenever possible attempt to request interpreter in advance to ensure interpreter is available. To do this, send an email to request@mayainterpreters.com and fill out the form found on the OFS Interpretation and Translation Guide

AVAZA

FOR SPANISH INTERPRETATION

1. Dial your OTP Telephone number: 534-3400
2. Press 1 for Spanish
3. Be able to provide your:
   - Access Code: 326
   - Name
   - Requested Language
4. Wait for interpreter to begin your session

BRIDGES FOR THE DEAF & HARD OF HEARING

INTERPRETATION FOR DEAF/HARD OF HEARING

1. Dial out number → 615-248-8828
2. Let them know you are requesting a Video Remote Interpreter on behalf of the Office of Family Safety. If asked, the account should also be under Jocelyn Hernandez (there is no account number)
3. Before calling, be prepared with the following:
   - A room with a computer screen accessible to you and the client (all-in-ones)
   - Client Name and Info
   - Advocate name, phone number, and email* (they will send a zoom link to connect to)

continue on the back

Metro Office of Family Safety

FREE INTERPRETATION SERVICES

The following services that are labeled as “free” are temporary language assitance that is completely free of charge to OFS. **Please prioritize using these services FIRST while they are available.**



TN LANGUAGE CENTER LANGUAGE LINE FREE

FOR ALL LANGUAGES (OUER 380). SERVICES ACCESSIBLE 24/7/365

1. Call the TLC Telephonic Interpretation line at 800-444-6627.
2. Enter your unique 8-digit PIN 8481-3609
3. Say your company or organization name
4. Select the language from the menu or press 0 for all other languages.
5. Connect with an interpreter

* If you have any difficulty using the service or would like to provide feedback, please email CIPD@tennessee.edu.

TN LANGUAGE CENTER LANGUAGE LINE FREE

FOR IN PERSON INTERPRETING

1 Ensure to request interpreter at least 24-48 hours in advance

2

Send an email with the following to richard.poncedeleon @tennessee.edu and CC Maria Arvizu (mariaarvizu@jisnashville.gov)

1. General overview of client meeting purpose
2. Location of client meeting
3. Time and Duration
4. Language Needed

3 Connect with interpreter

BRIDGES FOR THE DEAF & HARD OF HEARING CONTINUED

4

Services the client is needing (OP, court advocacy, safety planning, etc.)

5

Estimated duration

* advocate may give own work number or all-in-one email can be given as well (ex: ofsclient01@jisnashville.gov)

* Once this is given, the interpreter coordinator at Bridges will send you a Zoom invite via email with a link where the ASL interpreter will be connecting virtually.

ACTIVATING CHANGE

FREE

FOR DEAF & HARD OF HEARING

1

Access the Interpreter Request Form and fill it out via this link: https://forms.monday.com/forms/ad614fd34a9d3e79521d5fa4a581b5fa?r=use1

2

When filling out the form, please identify your client ONLY by one of the following Victim Identification Numbers that Activating Change has assigned to OFS:

- **231801**
- **231802**
- **231803**
- **231804**
- **231805**

Use only one number per client. When we have used all the numbers, we will request more.

continue on the back

Metro Office of Family Safety

Where Hope and Healing Begin

POLICIES

- OFS will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.
- OFS will not rely on accompanying adults, including friends and family members to act as interpreters.

BEST PRACTICES

- Brief the interpreter prior to a client meeting
- Speak directly to the client, not to the interpreter (the interpreter will speak in first person, not third)
- Speak clearly and in a normal tone
- Remember to pause between sentences or complete thoughts
- Refrain from using metaphors, acronyms, slang or idioms
- Allow only one person to speak at a time

Questions?

Contact: Maria Arvizu, LEP Coordinator
Phone: 615-880-1154
Email: MariaArvizu@jisnashville.gov

ACTIVATING CHANGE FREE CONTINUED

3 You will get an email within 24 hours confirming that your request was received. If the request can be filled, you will receive a confirmation email as soon as the assignment is filled.

4 Please submit your request NO LATER than 48 hours in advance. If submitted within 48 hours, service is not guaranteed.

5 If you need to cancel a request, email DeafAccess@activatingchange.org as soon as possible. Put "INTERPRETER REQUEST CANCELLATION" in the subject line and include the following info:

- Date, start/end time of meeting
- Victim Identification Number
- Any other information you consider important

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Office of Homeless Services Year: 2026

Title VI Coordinator: Antonia Whitfield Form Completed By: Antonia Whitfield

Form Completion Date: 7/13/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Training is provided during the onboarding process. Each new staff member receives a copy of Title VI ad physical copy of Metro's Civil Service policy which outlines in Section 3.1 employment opportunities policies, complaint procedures against discrimination. We are also adding a PowerPoint presentation which is being finalized for FY2027.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No Will attend the Fall training.

How does your department disseminate Title VI information (including your language access plan) to all employees?

Title VI information is addressed in OHS policies. There is an active development of language access plan. Our staff has information on obtaining access to the contracted service Language line, along with access codes. Another formal training and refresh is scheduled for the first quarter of FY27.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Since the public does not have to our main office location, there is no posting for the public at this location. There

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other If a call or email is received, the public is referred to the Human Relation Commission. However, this information will be update on OHS' official website.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 1

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
1/23/2026	In Progress	Select an Action	Currently in the midst of Conciliation process with MHRC
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Monitoring occurred annually during the time ARPA funds were available.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes We are finalizing the plan for staff distribution. ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metro Office of Homeless Services

TITLE VI COMPLIANCE TRAINING

Antonia Whitfield
Title VI Officer
antonia.whitfield@nashville.gov

WELCOME



Ensuring Equal Access to Programs and Services

Training Objectives

- What is Title VI
- Understand Title VI requirements
- Recognize prohibited discrimination
- Understand language access obligations
- Apply Title VI principles in daily work
- Identify potential compliance concerns
- Know how to report concerns



Why Title VI Matters

The Metro Office of Homeless Services is committed to ensuring that all individuals have equal access to programs, services, and opportunities. Title VI Helps Ensure

- **Fair treatment**
- **Equal opportunity**
- **Meaningful access**
- **Public trust**
- **Compliance with federal requirements**



What is Title VI?

Civil Rights Act of 1964

No person shall, on the basis of race, color, or national origin be excluded from participation in, denied benefits of, or subjected to discrimination under any federally funded program or activity.



Who is Protected?

Title VI protects individuals based on:

- **Race**
- **Color**
- **National Origin**

National Origin Includes

- **Country of origin**
- **Ethnicity**
- **Ancestry**
- **Limited English Proficiency (LEP)**



OHS Programs Covered by Title VI

Coordinated Entry Assessments	Street Outreach	Prevention and Diversion Services
Extreme Overflow Shelter	Landlord Engagement & Housing Navigation	Care Coordination
Individualized Placement and Support (IPS) Services	Asset Management	Emergency Assistance



Equal Access Means

- ✓ **Equal opportunity to apply**
- ✓ **Equal opportunity to participate**
- ✓ **Equal opportunity to receive benefits**
- ✓ **Equal access to information**
- ✓ **Equal treatment throughout service delivery**



Examples of Non-Compliance

Example 1

- **Staff provide quicker service to one racial group than another.**

Example 2

- **Clients of one nationality are discouraged from applying for services.**

Example 3

- **A client is denied information because they do not speak English.**

Example 4

- **A program advertises only in English despite serving large non-English-speaking populations.**



Limited English Proficiency (LEP)



Individuals with limited ability to read, write, speak, or understand English

Language barriers cannot become service barriers.

Meaningful Access

- **Understand services**
- **Complete applications**
- **Receive information**
- **Participate in programs**
- **Submit complaints regardless of English proficiency**

Staff Responsibilities

- **Treat all participants fairly**
- **Identify language needs**
- **Utilize interpretation resources**
- **Provide consistent information**
- **Follow procedures**
- **Report concerns**



What Employees Must Not Do



- ❌ **Deny services due to language barriers**
- ❌ **Make assumptions based on race or ethnicity**
- ❌ **Provide different service levels**
- ❌ **Discourage participation**
- ❌ **Ignore assistance requests**

How Title VI Applies Across OHS

Program Area	Title VI Considerations
Coordinated Entry	Consistent assessments and referrals
Street Outreach	Equal engagement and access to services
Prevention and Diversion Services	Objective eligibility and assistance decisions
Extreme Overflow Shelter	Equitable shelter access
Landlord Engagement & Housing Navigation	Fair housing opportunities and landlord interactions
Care Coordination	Consistent referrals and service coordination
IPS Services	Equal access to employment supports
Asset Management	Equitable management of housing resources
Emergency Assistance	Consistent delivery of emergency resources



Title VI in Coordinated Entry



- **Apply assessments consistently**
- **Use objective criteria**
- **Provide equal referral opportunities**
- **Ensure language access**

Title VI in Prevention & Diversion Services

- **Apply eligibility standards consistently**
- **Provide equal access to financial assistance**
- **Ensure participants understand options**
- **Avoid assumptions**



Title VI in Extreme Overflow Shelter

- **Consistent shelter access**
- **Equal treatment during high demand**
- **Effective communication**
- **Language access**

Title VI in Landlord Engagement & Housing Navigation

- **Provide equal housing search assistance**
- **Avoid steering**
- **Use objective criteria**
- **Support language access**

Title VI in Care Coordination

- **Make referrals using objective criteria**
- **Ensure clarity of services**
- **Document consistently**
- **Use language services**



Title VI in IPS Services

- **Equal access to employment opportunities**
- **Ensure language access**
- **Apply criteria consistently**
- **Avoid employability assumption**



Title VI in Asset Management



- **Apply policies consistently**
- **Monitor resources fairly**
- **Support equitable housing access**
- **Identify barriers**

Scenario: LEP Participant

A participant arrives seeking assistance but speaks very limited English.

A staff member says, "You'll need to return with someone who can translate.“



Scenario: Assumptions About Housing

- **A participant is not referred to a housing opportunity because staff assume the landlord will not accept them based on their national origin.**

Reporting Concerns

- **Supervisor**
- **Program Director**
- **Antonia Whitfield – Title VI Officer**
- **Metro Human Relations Commission: 615-880-3370**



Knowledge Check

True or False

1. **Language access is part of Title VI compliance.**
2. **National origin is protected under Title VI.**
3. **Services may be delayed until a participant brings an interpreter.**
4. **Title VI applies to all OHS programs receiving federal funding.**
5. **Staff should report potential concerns.**



Key Takeaways

- ✓ **Equal access is everyone's responsibility**
- ✓ **Language access matters**
- ✓ **Use objective criteria**
- ✓ **Apply policies consistently**
- ✓ **Report concerns promptly**



Resources

- **OHS Title VI Officer: antonia.whitfield@nashville.gov**
  - **Metro Human Relations Commission: 615-880-3370**
  - **OHS Policies & Procedures**
  - **Language Access Resources**
  - **MHRC Title VI Program**



Employee Acknowledgment

- **I understand my responsibility to provide equitable access to services in accordance with Title VI requirements and OHS policies.**

Office of Homeless Services

Written Language Access Plan

DRAFT

1. Purpose

To ensure individuals experiencing homelessness—regardless of language, literacy level, or communication needs—have meaningful, equitable access to OHS programs, services, and information.

2. Scope

This plan applies to all OHS staff, contractors, volunteers, and all public-facing communications, including direct services, intake, outreach, shelter operations, and administrative functions.

3. Definitions

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

Vital Documents: Documents that contain information critical for accessing OHS services or benefits.

Interpretation: The act of converting spoken words from one language to another.

Translation: The act of converting written text from one language to another.

4. Language Demographics & Prioritization

Priority languages include English, Spanish, Kurdish (Sorani and Kurmanji), and Arabic. Needs are reviewed annually based on intake data and community trends.

5. Language Assistance Services

OHS provides free, accessible, confidential interpretation and translation services, including telephonic, in-person, and video interpretation, and translation of vital documents.

6. Communication Accessibility

OHS ensures access for individuals with disabilities or low literacy through plain-language materials, easy-read documents, large print versions, and ADA accommodations including ASL interpretation.

7. Public Awareness

Interpreter availability signage will be displayed in all public areas, and language access information will be posted on the OHS website and printed materials.

8. Staff Training

Annual mandatory training includes language identification, proper use of interpretation tools, cultural competency, ADA communication, and emergency protocols for LEP individuals.

9. Recordkeeping & Documentation

Staff must record language preference, interpretation usage, barriers encountered, and any follow-up needs to support compliance and service improvement.

10. Monitoring & Evaluation

Leadership will review the plan annually, evaluate usage patterns, and update services and translations as needed.

DRAFT

11. Contact for Language Access

Language Access Coordinator: Antonia Whitfield
Phone: 615-880-2857
Responsible for oversight, compliance, staff training, and coordination of translation and interpretation services.

DRAFT

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Parks Year: 2026

Title VI Coordinator: Leigh Anne Lee Form Completed By: Leigh Anne Lee

Form Completion Date: 7/10/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Employees receive online training.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Through email to supervisors, who share with employees.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

This information is posted in public-facing locations (posters). It is also listed on our website.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Parks HR is currently working to complete our Language Access Plan. We plan to implement the plan no later than 12/31/26. We have already implemented accessibility to translators through LanguageLine.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

METRO PARKS AND RECREATION
DISCRIMINATION COMPLAINT PROCEDURE

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by Metro Parks or its sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complaint.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding the specifically requested relief and settlement opportunities.

PROCEDURES

1. Any individual, group of individuals, or entity that believes that they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the Metro Parks Title VI Coordinator. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements.

    a. Complaint shall be in writing and signed by the complainant(s).

b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which the conduct was discontinued or the latest instance of the conduct.)
c. Present a detailed description of the issues, including the names and job titles of those individuals perceived as parties in the complained-of incident.
d. Allegations received by fax or e-mail will be acknowledged and processed once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for Metro Parks to be able to process it.
e. Allegations received by telephone will be reduced to writing and provided to the complainant(s) for confirmation or revision before processing.

2. A complaint form will be forwarded to the complainant for them to complete, sign, and return to Metro Parks for processing. Upon receipt of the complaint, the Title VI Program Coordinator will determine its jurisdiction, acceptability, and need for additional information as well as investigate the merit of the complaint. In cases where the complaint is against one of Metro Parks' subrecipients of federal funds, Metro Parks will assume jurisdiction and will investigate and adjudicate the case. Complaints against Metro Parks will be referred to the Metro Human Relations Commission or the appropriate agency for proper disposition pursuant to their procedures.

3. To be accepted, a complaint must meet the following criteria:

The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The allegation(s) must involve a covered basis such as race, color, or national origin. The allegation(s) must involve a program or activity of a federal-aid recipient, subrecipient, or contractor.

4. A complaint may be dismissed for the following reasons:

    a. The complainant requests the withdrawal of the complaint.
    b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
    c. The complainant cannot be located after reasonable attempts.

5. Once Metro Parks decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will then be logged into Metro Parks' records identifying its basis and alleged harm.

6. In cases where Metro Parks assumes the investigation of the complaint, Metro Parks will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of the Metro Parks written notification of acceptance of the complaint to furnish their response to the allegation(s).

7. The Metro Parks final investigative report and a copy of the complaint will be forwarded to the appropriate State and Federal agency and affected parties within 60 calendar days of the acceptance of the complaint.

8. Metro Parks will notify the parties of its final decision. If the complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the appropriate State or Federal agency.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Planning Commission Year: 2026

Title VI Coordinator: Randi Semrick Form Completed By: Randi Semrick

Form Completion Date: 6/5/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Brochures

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We have LEP information on our bulletin board in English, Chinese, Spanish and Arabic. An LEP Plan has been started, but not yet completed

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

In the Main Public Hallway

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No(We can access the Human Relations procedures. We do have a form and a tracking form.)

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No(The Title VI language is included in the procurement process and contracts as per Metro Finance.)

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

An LEP Plan has been started, but not yet completed.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Police Year: 2026

Title VI Coordinator: Seth Waltenbaugh Form Completed By: Whitney Heinze

Form Completion Date: 6/10/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

New hire orientations - in-person sessions

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We have Title VI posters with complaint reporting information in the lobby of each of our facilities.

We also have a policy in our manual outlining language line use procedures to assist non-English speaking citizens.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

- MNPD Headquarters
- Central Precinct
- East Precinct
- Hermitage Precinct
- Madison Precinct
- Midtown Hill Precinct
- North Precinct
- South Precinct
- West Precinct
- Southeast Precinct
- Property and Evidence Section
- Metro Southeast
- MNPD Training Academy
- Forensic Services Division
- Central Records Division

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

Please see the following attachments for investigating and tracking procedures:

- MNPD Manual - Biased Based Policing Policy
- MNPD Manual - Investigations and Tracking of Complaints
- MNPD Manual - Harassment and Discrimination Policy

Additionally, Title VI complaints are tracked and maintained in a biased-based policing report annually.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☑ Other Pamphlets

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 18

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
12/5/2024	Completed	None	The complainant alleged an officer approached him due to his race. The complaint was investigated and found to be unfounded.
2/11/2025	Completed	None	The complainant alleged an officer racially profiled him before conducting a traffic stop. The complaint was investigated and found to be unfounded.
2/19/2025	Completed	None	The complainant alleged officers arrested him based on his race. The complaint was investigated and found to be unfounded.
2/19/2025	Completed	None	The complainant alleged officers on scene stopped him due to his race. The complaint was investigated and found to be unfounded.
3/24/2025	Completed	None	The complainant alleged an officer racially profiled him before conducting a traffic stop. The complaint was investigated and found to be unfounded.
7/3/2025	Completed	None	The complainant alleged an officer racially profiled him before detaining and searching his person. The complaint was investigated and found to be unfounded.
07/07/2025	Completed	None	The complainant alleged an officer racially profiled her prior to conducting a traffic stop. The complaint was investigated and found to be unfounded.
07/07/2025	Completed	None	The complainant alleged officers racially profiled her while responding to a residential burglary call for service. The complaint was investigated and found to be unfounded.
07/07/2025	Completed	None	The complainant alleged officers racially profiled her while responding to a residential burglary call for service. The complaint was investigated and found to be unfounded.
09/08/2025	Completed	None	The complainant alleged officers approached her son and his friends due to their race. The complaint was investigated and found to be unfounded.

09/08/2025	Completed	None	The complainant alleged officers approached her son and his friends due to their race. The complaint was investigated and found to be unfounded.
09/08/2025	Completed	None	The complainant alleged officers approached her son and his friends due to their race. The complaint was investigated and found to be unfounded.
09/16/2025	Completed	None	The complainant alleged an officer was biased towards her family based up ethnicity during her response to a call for service. The complaint was investigated and found to be unfounded.
11/21/2025	Completed	None	The complainant alleged an officer issued him a citation based on his race. The complaint was investigated and found to be unfounded.
04/11/2025	Completed	None	Internal employee investigation: The complainant alleged a supervisor made discriminatory statements to her based upon her race. The complaint was investigated and found to be not sustained.
08/05/2025	Completed	None	Internal employee investigation: The complainant alleged an officer made racially discriminatory statements to her. The complaint was investigated and found to be not sustained.
08/07/2025	Completed	None	Internal employee investigation: The complainant alleged a supervisor made discriminatory statements to him based upon his ethnicity. The complaint was investigated and found to be not sustained.
10/14/2025	Completed	None	Internal employee investigation: The complainant alleged an officer made racially discriminatory statements to her. The complaint was investigated and found to be unfounded.

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

We have subrecipients in our ICAC Grant. We conduct monitoring visits to each entity to ensure they are purchasing the approved equipment or training. We also ensure that they have a Title VI poster posted in their facility for Title VI purposes.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

Please see the following attachment:

- MNPD Manual - Language Plan

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

4.40 Biased Based Policing

It is the policy of the department to police in a proactive manner, to actively enforce criminal laws, while insisting that individuals will only be stopped or detained when there exists reasonable suspicion to believe they have committed, are committing, or are about to commit, a violation of the law.

Law enforcement personnel should focus on a person's conduct or other specific suspect information. They must have reasonable suspicion supported by specific articulated facts to support the conclusion that a person contacted regarding identification, activity or location has been, is, or is about to commit a crime. Personnel should have the same level of supporting evidence that the subject is currently presenting a threat to the safety of themselves or others.

Annually, the Metropolitan Nashville Police Department will provide training addressing the prevention of biased-based police practices. Training may include field contacts, traffic stops, search issues, asset seizure and forfeiture, interview techniques, cultural diversity, discrimination, and community support. Training will occur at annual in-service training, roll call training, field training by department Field Training Officers (FTOs), or training by line supervisors.

4.40.010 Definitions

A. **Biased Based Policing:** is the selection of individuals for enforcement intervention based ***solely*** on a common trait of a group, such as race, ethnic origin, gender, socioeconomic status, sexual orientation, or age. This however does not preclude consideration of race or ethnicity when it is part of a suspect's description or is otherwise validly related to an officer's investigation of criminal activity.

B. **Reasonable Suspicion:** Suspicion that is more than a mere hunch. It is a conclusion based on a set of articulable facts and circumstances that would warrant a person of reasonable caution to believe that an infraction of the law has been committed, is about to be committed, or is in the process of being committed, by the person or persons under suspicion. This can be based on the observations of a police officer combined with his or her training and experience, and/or reliable information received from credible sources.

4.40.020 Procedures

A. Individuals shall only be subjected to stops, seizures or detentions upon reasonable suspicion that they have committed, are committing, or are about to commit a criminal offense, or that the subject is currently presenting a threat to the safety of themselves or others.

B. No individual, once cited or warned, shall be detained beyond the point where there exists no reasonable suspicion of further criminal activity, and no person, vehicle, or dwelling shall be searched in the absence of a warrant, a legally recognized exception to the warrant requirement, or the person's voluntary consent. In the case of traffic stops where such a search is conducted, this information shall be recorded on MNPD Form 252, Vehicle Stops Data Form, including the legal basis for the search, and the results thereof.

NOTE: It is strongly recommended that consent searches only be conducted with written consent, using the proper departmental form. If the individual indicates that they will consent to a search but are refusing to sign the form, fill out the form anyway and indicate "consented to search but refused to sign," inserting initials and the signature of any witness in the signature block.

C. In the absence of a specific, credible report containing a physical description, a person's race, ethnic origin, gender, socioeconomic status, sexual orientation, or age, or any combination of these, shall not be a factor in determining probable cause for an arrest or reasonable suspicion for a stop.

D. The deliberate recording of any misleading information related to the actual or perceived race, ethnic origin, gender, socioeconomic status, sexual orientation, or age of a person stopped for investigative or enforcement purposes is prohibited and a cause for disciplinary action.

E. Appropriate enforcement action should always be completed, generally in the form of a warning, citation or arrest. MNPD Form 252, Vehicle Stops Data Form, must be completed by the officer for traffic stops. The form shall include the gender, race or ethnicity of the person stopped, if this information can reasonably be ascertained by physical appearance or from the driver's license, other documents provided by

the vehicle operator, voluntary statements from the person stopped, or observations made by the officer.

G. Traffic enforcement will be accompanied by consistent, ongoing supervisory control to ensure that officers do not go beyond the boundary of reasonableness in conducting such activities. Supervisors will monitor traffic activities of assigned employees to ensure biased enforcement of traffic violators does not occur. Supervisors shall review reports filed on stops by officers and respond at random to back up officers on vehicle stops and shall take appropriate action whenever it appears that this policy is being violated, being particularly alert to any pattern or practice of possible discriminatory treatment by individual officers or components.

4.40.030 Training Measures

A. Officers will receive initial and ongoing training in proactive enforcement tactics, including training in officer safety, courtesy, cultural diversity, laws governing search and seizure, and interpersonal communications skills.

B. Training programs will emphasize the need to respect the rights of all citizens to be free from unreasonable government intrusion or police action based on a common trait of a group, such as race, ethnic origin, gender, socioeconomic status, sexual orientation, or age.

4.40.040 Property Seizure and Forfeiture

All seizures of property shall be subject to the same standards set forth in the above order in that the decision to seize property shall not be based solely on a common trait of a group, such as race, ethnic origin, gender, socioeconomic status, sexual orientation, or age. Additionally, all seizures and forfeitures will comply with current policy on property and evidence collection and storage of the Metropolitan Nashville Police Department.

4.40.050 Complaint Procedures

A. Any person may file a complaint with the department if they feel they have been stopped or searched based solely on as race, ethnic origin, gender, socioeconomic status, sexual orientation, or age, and no person shall be discouraged, intimidated, or coerced from filing such a complaint, or discriminated against because they have filed such a complaint. All complaints shall be handled per current departmental policy.

B. On an annual basis, the Office of Professional Accountability will compile an administrative review of all profiling complaints for the year, including the findings as to whether they were sustained, not sustained, or exonerated including a review of agency practices including citizen concerns. This report will be made public through the Office of the Chief of Police.

4.40.060 Vehicle Stops Form

A. The Vehicle Stops Data Form was originally developed by the State of Tennessee Comptroller's Office. Sworn officers of the Nashville Metropolitan Police Department are required to complete MNPD Form 252, Vehicle Stops Data Form for **ALL** vehicle stops initiated.

B. MNPD Form 252, Vehicle Stops Data Form shall be completed for all officer-initiated vehicle stops (moving traffic violations, equipment violations, and investigative stops based on reasonable suspicion or probable cause of criminal conduct).

C. The following information will be provided by the officer who initiated the stop:

1. Department Originating Agency Identifier Number (pre-printed TN019000)
2. Officer Identification Number (Six Digit Employee Number)
3. Location of Stop-Beat, District, precinct, Tract, Zone (pre-printed DAVIDSON CO)
4. Gender of vehicle operator stopped
5. Time (Military)
6. Date (mmddyy)
7. Race of the vehicle operator
8. Ethnicity of vehicle operator
9. Age of driver
10. Reason for initiating stop
11. Results of stop
12. Who was action taken against?
13. Did a search occur?

14. Type of search, if applicable

15. Legal basis for search, if applicable any “Terry Stop” / “Pat Down” search should be considered and marked as Probable Cause

16. Physical evidence seized, if applicable

17. Type of evidence seized, if applicable

18. Driver’s license number and state

19. Vehicle tag number and state
20. Actual location / nearest cross street

21. Related complaint number, if applicable

22. Reporting Area (RPA), (Completed by Data Entry Section)

23. Related Ticket Number, if applicable

24. Officer Assignment (enter a single character for assignment [**P**atrol, **T**raffic, **A**dministrative, **I**nvestigative, or **O**ther (K-9, School Services, etc.)])

D. The Crime Analysis Unit will provide the Chief of Police with an annual report of Vehicle Stop Data information.

a. Time spent processing a complaint through the mediation process shall not be included in the 45 day investigative timeline outlined in current policy.

7. Once mediation has been completed, a mediation outcome form will be emailed to the referring supervisor within 14 days of the completion date.

8. Once the referring supervisor receives the mediation outcome form, MNPD Form 312, Complaint Report, shall be completed with a finding of Matter of Record given to the policy provision. A note on the MNPD Form 312 regarding the mediation shall be used, such as the following:

   "The complainant and employee agreed to participate in mediation. Mediation occurred on *(insert date)* with both parties mediating in good faith and with a successful outcome.

   This complaint will be closed as a Matter of Record at this time."

9. Documentation of the successful mediation (i.e., documentation of the complaint, mediation referral form, mediation outcome form, etc.) shall be attached to the MNPD form 312.

10. MNPD Form 312, Complaint Report, shall be processed per current departmental policy.

4.10.040 Investigation of Complaints: Office of Professional Accountability

A. The Office of Professional Accountability shall review complaints against employees, whether initiated by the public or by a member of the department.

B. The Director of the Office of Professional Accountability shall be directly accountable to the Chief of Police and the Mayor for the proper administration, general management, and control of all matters related to the operation of that division. The Director of the Office of Professional Accountability has the authority to report directly to the Chief of Police and the Mayor.

C. The Office of Professional Accountability may initiate an investigation of alleged employee misconduct, with or without a formal complaint, with the prior knowledge and approval of the Chief of Police or designee.

1. The role of the Office of Professional Accountability is to investigate administrative (departmental) violations, and if during an investigation there are potential criminal violations, the criminal aspect of the

investigation will be referred to the appropriate criminal investigative unit.

2. The Office of Professional Accountability may continue their investigation of the potential administrative violations, as a separate investigation from any criminal investigation. OPA may continue, or have continued, an administrative investigation to assess or establish an administrative duty or omission of duty relevant to the underlying criminal investigation.

3. The criteria for determining the categories of complaints to be referred to the Office of Professional Accountability may include, but are not limited to: allegations of corruption, brutality, misuse of force, major breach of civil rights and criminal misconduct. When an allegation of misuse of force is reported to the immediate supervisor, it shall be the responsibility of that supervisor to conduct a preliminary investigation into such allegations before reporting them to the Office of Professional Accountability.

4. **The Chief of Police shall be informed through the chain of command about major complaints as soon as possible, and no later than the start of the next business day.**

D. The Office of Professional Accountability may make additional inquiry or use investigative measures deemed necessary to verify, authenticate or clarify the findings and recommendations of a supervisor initiated investigative report. The Office of Professional Accountability may include these findings and disposition recommendations with the report submitted to the Chief of Police and the Deputy Chief or Commander/Director of the involved employee.

E. The Office of Professional Accountability shall complete an appropriate MNPD form (311, 313A, 313, or 343) for any investigation initiated by the Office of Professional Accountability where there has been an investigative finding that an employee has violated any policy, procedure, rule or regulation of the Metropolitan Nashville Police Department or the Civil Service rules and regulations. The completed MNPD form(s) shall accompany the official report.

F. The Office of Professional Accountability shall have the following additional responsibilities.

1. Maintain a complaint log,

2. Maintain a central file of complaints in a secured area and in conformity with records retention requirements from state law,

3. Conduct a regular audit of complaints to determine the need for changes in training or policy, and report the findings to the Chief of Police and Deputy Chiefs,

4. Maintain statistical and related information to identify trends involving all complaints of excessive force and abuse of authority, and

5. Track complaints against individual employees to assist in employee risk analysis.

G. The Chief of Police and/or Office of Professional Accountability investigators shall keep the complainant informed concerning the status of a complaint, to include:

1. Verification that the complaint has been received for processing.

2. Status reports regarding the progress of the investigation every thirty (30) calendar days.

3. Notification of the results upon conclusion.

H. Investigative reports prepared by the Office of Professional Accountability into allegations of misconduct will include an "Investigative Finding". The "investigative finding" is drawn from the evidentiary facts, and may include recommendations to changes in policies, procedures, rules, and regulations that may prevent future allegations of misconduct, as well as the need to modify or expand training.

I. The Office of Professional Accountability shall compile an annual statistical summary based on records of employee investigations, to be made available to the public and department employees.

4.10.050 Office of Professional Accountability Records and Confidentiality

A. The Office of Professional Accountability shall be informed of all final disciplinary decisions.

B. The case files at the Office of Professional Accountability shall be maintained separately from personnel records.

C. OPA Investigative Timelines:

1. Active Investigations should be completed within forty-five (45) calendar days from the date the employee has received formal notification that they have become the subject of an internal investigation, or from the

date when an employee cannot reach a settlement with his/her supervisor(s) on the allegation, whichever is the later date. Investigations may exceed forty-five (45) calendar days with the approval of the Chief of Police or his designee. The complainant and employee shall be notified of the approved extension request. Unless the circumstances, including, but not limited to, the type of offense and the allegations known to the Department, indicate otherwise, the employee will be notified within ten (10) calendar days of receipt of the complaint. The commander of the Office of Professional Accountability will forward a status report twice monthly of all active cases to the Chief of Police.

2. The above timelines are not applicable to preliminary inquiries or fact-finding used to determine the need for a formal investigation or to determine the appropriate investigative resource. Additionally, the forty-five (45) calendar day timeline would not apply to cases involving circumstances beyond the control of the investigative unit, e.g., cases pending litigation, requiring covert investigation, or where the employee is not readily available for the investigation to proceed.

3. An investigation is closed when it has been reviewed and approved as closed by the appropriate supervisory personnel of the assigned investigator.

4. A closed investigation may be re-opened upon receipt of new information.

4.10.060 Investigative Interviews, Examinations & Searches

A. Formal Investigative Interviews

1. The provisions provided in this section are intended to provide guidance to supervisors in conducting formal investigative interviews and are not applicable to routine questioning or preliminary inquiries. A formal investigation is generally described as one where the target of the investigation has been identified and disciplinary action is expected or pending.

   NOTE: *Provisions applicable to OPA conducted interviews, examinations and searches are in the OPA Standard Operating Procedures and available for inspection during normal business hours.*

2. When an employee receives official notification that they have become the subject of a formal internal investigation, the investigating authority shall issue the employee a brief statement of the allegations and refer

4.50 Harassment and Discrimination

4.50.010 Purpose

The purpose of this order is to maintain a healthy work environment in which all individuals are treated with respect and dignity and to provide procedures for reporting, investigating, and resolving complaints of harassment and discrimination. Federal law provides for the protection of classes of persons based on race, color, gender, religion, age, disability, and national origin. This order also provides for the protection of classes of persons based on their sexual orientation.

4.50.020 Policy

It is the policy of the Metropolitan Nashville Police Department that all employees have the right to work in an environment free of all forms of harassment and discrimination. The Metropolitan Nashville Police Department **will not** tolerate, condone, or allow harassment or discrimination by employees or of employees. The Metropolitan Nashville Police Department considers the harassment and discrimination as a form of serious employee misconduct. Therefore, this department shall take direct and immediate action to prevent such behavior, and to remedy all reported instances of harassment and discrimination. A violation of this order can lead to discipline, up to and including termination. Repeated violations, even if “minor”, will result in greater levels of discipline as appropriate.

4.50.030 Definitions

For purposes of this policy, the following definitions apply:

A. **Discrimination:** Any action that unlawfully or unjustly results in unequal treatment of persons based on race, color, gender, religion, age, disability, sexual orientation, or national origin.

B. **Retaliation:** Taking, or threatening to take, an unfavorable personnel action or withholding, or threatening to withhold, a favorable personnel action against an individual for attempting to communicate a complaint of discrimination or harassment to a supervisor, the Director of the MNPD Human Resources Division, the Office of Professional Accountability, the Chief of Police, the Metropolitan Government Equal Employment Opportunity Coordinator, or any other person, entity, or agency.

C. **Sexual harassment:** Unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of employment or favorable or unfavorable treatment; or

2. Submission to or rejection of such conduct by an employee is used as the basis for employment-related decisions affecting the employee; or

3. Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment may be in the form of comments, acts, or gestures. It is not limited to overt physical acts. Suggestive comments, jokes of a sexual nature, sexually suggestive objects or pictures, obscene gestures, sexually graphic stories, as well as unwanted touching, can all constitute sexual harassment. Conducting, encouraging or condoning any of the above activities toward or about a person of the same gender, can also constitute sexual harassment.

4.50.040 General Provisions

A. Prohibited Activity

1. No employee shall either explicitly or implicitly ridicule, mock, deride, or belittle any person.

2. Employees shall not make offensive or derogatory comments to any person, either directly or indirectly, based on race, color, gender, religion, age, disability, sexual orientation or national origin. Such harassment is a prohibited form of discrimination under state and federal employment law and/or is also considered misconduct subject to disciplinary action by this department.

B. Employee / Supervisor Responsibilities

1. Each supervisor shall be responsible for preventing acts of harassment and/or discrimination. This responsibility includes the following:

   a. Monitoring the unit work environment on a daily basis for signs that harassment and/or discrimination may be occurring;

   b. Counseling all employees on the types of behavior prohibited, and the department procedures for reporting and resolving complaints of harassment and/or discrimination;

   c. Stopping any observed acts that may be considered

harassment and/or discrimination, and taking appropriate steps to intervene, whether or not the involved employees are within his/her line of supervision; and

d. Taking immediate action to prevent retaliation towards the complaining party and to eliminate the hostile work environment where there has been a complaint of harassment and/or discrimination, pending investigation. If a situation requires separation of the parties, care should be taken to avoid actions that appear to punish the complainant. Transfer or reassignment of any of the parties involved should be voluntary if possible and, if non-voluntary, should be temporary, pending the outcome of the investigation.

Failing to carry out these responsibilities shall be grounds for discipline.

2. Once a supervisor has been advised, formally or informally, of an incident or incidents involving possible harassment and/or discrimination, that supervisor is responsible to, and shall, initiate an investigation as established by Article VI, Section A, Filing a Complaint with a Supervisor. Any supervisor shall assist any employee of this department who comes to that supervisor with a complaint of harassment and/or discrimination in documenting and filing a complaint with the Office of Professional Accountability or other investigatory authority as designated by this department.

3. Each employee of this department is responsible for assisting in the prevention of harassment and/or discrimination through the following acts:

a. Refraining from participation in, or encouragement of, actions that could be perceived as harassment and/or discrimination;

b. Reporting acts of harassment and/or discrimination to a supervisor; and

c. Encouraging any employee who confides that he or she is being harassed and/or discriminated against to report these acts to a supervisor.

Failure of any employee to carry out these responsibilities shall be grounds for discipline.

4.50.050 Complaint Procedures

Any employee encountering harassment and/or discrimination is encouraged to inform the person that his/her actions are unwelcome and offensive. The employee will document all incidents of harassment and/or discrimination in order to provide the fullest basis for investigation.

Any employee who believes that he/she is being harassed and/or discriminated against shall report the incident(s) as soon as possible so that steps may be taken to protect the employee from further harassment and/or discrimination, and so the appropriate investigative and disciplinary measures may be initiated.

If it is a continuing problem, the complainant should state when the conduct began and the progression of events to the time of the complaint. A complaint may be filed by a current employee, an applicant, or any other person. A complaint may be filed individually or as a group. All complainants shall have the right to have one representative of their choosing with them at all stages of the complaint procedure.

The complaining party's confidentiality will be maintained throughout the investigatory process to the extent practical and appropriate under the circumstances.

Whether the offending party is in the complainant's chain of command or not, the employee may file a departmental complaint with their supervisor; another supervisor, the Director of the MNPD Human Resources Division, the Office of Professional Accountability, the Chief of Police, or the Equal Employment Opportunity Coordinator of the Metropolitan Government Human Resources.

A complaint of harassment and/or discrimination may be filed according to the following procedures:

A. Filing a Complaint with a Supervisor

1. When any supervisor is notified of a harassment and/or discrimination complaint, that supervisor shall meet with the employee and document the complaint in writing to include, but not limited to:

    a. The incident(s) complained of;

    b. The person(s) performing or participating in the harassment and/or discrimination;

    c. Any witnesses to the incident(s); and

    d. The date(s) on which it occurred.

2. The department employee taking the complaint shall promptly submit a confidential memorandum, documenting the complaint, to the Chief of Police and the Director of the MNPD Human Resources Division, with a copy forwarded to the complaining party's Bureau Commander and the Office of Professional

Accountability.

3. If the supervisor who is documenting the complaint is not in the chain of command of the complaining party, upon receipt of the confidential memorandum, the Chief of Police or his/her designee will designate the appropriate party to conduct the investigation.

4. The supervisor designated to conduct the investigation shall document all aspects of the investigation and inform the employee, in writing, of the results and/or action(s) taken to date within seven (7) working days.

5. Any resolution to the complainant shall be acknowledged by the investigating supervisor and the complaining party, in writing, to then be forwarded and reviewed by the complaining party's chain of command to ensure fairness and impartiality.

6. Failure to take action regarding complaints of harassment and/or discrimination shall be grounds for disciplinary action.

7. If the complaining party is dissatisfied with the results of the investigation, the complaining party should follow the steps outlined in Article VI, Section D, Filing a Complaint with the Chief of Police, within ten (10) calendar days of the final disposition of the investigating supervisor.

B. Filing a Complaint with the Director of the MNPD Human Resources Division

1. When the Director of the MNPD Human Resources Division is notified of a harassment and/or discrimination complaint, a meeting with the employee shall occur to document the complaint in writing to include, but not limited to:

   a. The incident(s) complained of;

   b. The person(s) performing or participating in the harassment and/or discrimination;

   c. Any witnesses to the incident(s); and

   d. The date(s) on which it occurred.

2. The Director of the MNPD Human Resources Division shall promptly submit a confidential memorandum, documenting the complaint, to the Chief of Police, with a copy forwarded to the complaining party's Bureau Commander and the Office of Professional Accountability.

3. Upon receipt of the confidential memorandum, the Chief of Police

or his/her designee will designate the appropriate party to conduct the investigation.

4. If the Director of the MNPD Human Resources Division (or an authorized designee) has been designated to conduct the investigation, he/she shall document all aspects of the investigation and inform the employee, in writing, of the results and/or action(s) taken to date within seven (7) working days.

5. Any resolution to the complainant shall be acknowledged by the Director of the MNPD Human Resources Division and the complaining party, in writing, to then be reviewed by the complaining party's chain of command to ensure fairness and impartiality.

6. Failure to take action regarding complaints of harassment and/or discrimination shall be grounds for disciplinary action.

7. If the complaining party is dissatisfied with the results of the investigation, the complaining party should follow the steps outlined in Article VI, Section D, Filing a Complaint with the Chief of Police, within ten (10) calendar days of the final disposition of the Director of the MNPD Human Resources Division.

C. Filing a Complaint with the Office of Professional Accountability

1. The Office of Professional Accountability shall be responsible for investigating any complaint alleging harassment and/or discrimination reported to that division.

2. Upon receipt of the complaint, the Office of Professional Accountability shall promptly submit a confidential memorandum, documenting the complaint, to the Chief of Police, with a copy forwarded to the complaining party's Bureau Commander. The Office of Professional Accountability shall also immediately notify the District Attorney's Office if the complaint contains evidence of criminal activity.

3. The Office of Professional Accountability investigator shall include a determination as to whether other employees or citizens are being harassed and/or discriminated against by the person(s), and whether other department employees participated in or encouraged the harassment and/or discrimination.

4. The investigation of the complaint shall be completed within thirty (30) calendar days of receipt. An additional thirty (30) calendar days may be authorized by the Chief of Police should the complexity or other complicating factors of the investigation warrant the extension.

5. The Office of Professional Accountability shall forward the full report and findings to the Chief of Police upon completion of the investigation.

6. After review, the Chief of Police will send a written notice of the results and/or action(s) taken to date within fourteen (14) calendar days to the complainant.

7. If the complaining party is dissatisfied with the results of the investigation, the complaining party should follow the steps outlined in Article VI, Section E, Filing a Complaint with the Metropolitan Government Equal Employment Opportunity Coordinator, within ten (10) calendar days of the final disposition of the Office of Professional Accountability.

8. All files of harassment and/or discrimination complaints shall be maintained in a secure location within the Office of Professional Accountability. The Chief of Police shall be provided with an annual summary of all harassment and discrimination complaints by the Office of Professional Accountability commander.

D. Filing a Complaint with the Chief of Police

1. When a complaint is filed with the Chief of Police, the Chief or the Chief's designee shall investigate the complaint and take corrective action should the allegation(s) be sustained.

2. The investigation of the complaint shall be completed within thirty (30) calendar days of receipt, with an additional thirty (30) calendar days allowed should the complexity or other complicating factors of the investigation warrant the extension.

3. The Chief of Police shall notify the complaining party, in writing, of the results of the investigation and any pending disciplinary charges, within fourteen (14) working days of the conclusion of the investigation.

4. If the Chief of Police determines that the allegations warrant a third-party investigation, he/she shall refer the complaint to the Metropolitan Government Equal Employment Opportunity Coordinator to assist in the investigation. The Chief of Police will also refer the complaining party to Article VI, Section E, Filing a Complaint with the Metropolitan Government Equal Employment Opportunity Coordinator, in the written reply required in Article VI, Section D, Filing a Complaint with the Chief of Police.

5. If the complaining party is dissatisfied with the results of the investigation, they should follow the steps outlined in Article VI, Section E, Filing a Complaint with the Metropolitan Government Equal Employment Opportunity Coordinator, within ten (10) calendar days of the final disposition of the Chief of Police.

E. Filing a Complaint with the Metropolitan Government Equal Employment Opportunity Coordinator

1. The complaining party may file a written complaint with the Equal Employment Opportunity Coordinator of the Metropolitan Government Human Resources. Such written complaint shall be filed within ten (10) working days from the date of notification from the Chief of Police, as set out in Article VI, Section D, Filing a Complaint with the Chief of Police.

2. If the alleged offending party is the Chief of Police, Article VI, Section E, Filing a Complaint with the Metropolitan Government Equal Employment Opportunity Coordinator, is where the complaint process begins.

3. The Metropolitan Government Equal Employment Opportunity Coordinator is responsible for conducting an investigation of the complaint. The investigation shall be completed within thirty (30) calendar days of receipt. An additional thirty (30) calendar days may be authorized by the Director of Metropolitan Government Human Resources should the complexity or other complicating factors of the investigation warrant the extension.

4. The Metropolitan Government Equal Employment Opportunity Coordinator is responsible for notifying the complaining party and the Chief of Police, in writing, of the results of the investigation, and any further action to be taken, within ten (10) working days of the conclusion of the investigation.

5. If the alleged offending party is the Chief of Police and the allegation(s) are sustained, the Metropolitan Government Equal Employment Opportunity Coordinator will forward the results to the Mayor for review and action.

6. After review, the Chief of Police will send a written notice of the results and/or action(s) taken to date within fourteen (14) calendar days to the complainant.

7. If the complaint has progressed to Article VI, Section E, Filing a Complaint with the Metropolitan Government Equal Employment

Opportunity Coordinator, because of dissatisfaction with the initial decision of the Chief of Police, and the Metropolitan Government Equal Employment Opportunity Coordinator has remanded the complaint to the Chief of Police for further review, the Chief of Police shall review the case and notify the complaining party, in writing, of the results and/or action(s) taken of the further review within fourteen (14) working days of receiving the case from the Metropolitan Government Equal Employment Opportunity Coordinator.

8. Complainants or employees accused of harassment and/or discrimination may file a grievance (within ten (10) calendar days of the final disposition of the Chief of Police) in accordance with current departmental policy and Civil Service Commission Rules when the employee disagrees with the results of the investigation or disposition of a harassment and/or discrimination claim.

4.50.060 Retaliation

A. Retaliation against any employee for filing a harassment and/or discrimination complaint, or for assisting, testifying, or participating in the investigation of such a complaint, is illegal and is prohibited by this department and by federal statutes.

B. Retaliation is a form of employee misconduct. Any evidence of retaliation shall be considered a separate violation of this policy and shall be handled by the same complaint procedures established for harassment and discrimination complaints.

C. Monitoring to ensure that retaliation does not occur is the responsibility of the Chief of Police, all supervisors and the Office of Professional Accountability. It is the responsibility of the complainant to report any retaliation or attempt of retaliation to his/her supervisor or any other supervisor, the Director of the MNPD Human Resources Division, Office of Professional Accountability, Chief of Police, or to the Equal Employment Opportunity Coordinator of the Metropolitan Government Human Resources.

18.90 Interpreter Services – Cell Phone Translators & Language Line

18.90.010 Generally

Considering the availability of interpreter services available to the MNPD, it is preferred that officers utilize neutral, professionally competent interpreters for non-native English speakers whenever practical.

When such resources are unavailable or circumstances don't permit, personnel may seek out others at the scene, such as a neighbor, a friend, or the victim's children as the first avenue of interpretation for **routine calls for service or when an exigency exists**.

If there is no one at the scene to assist in translating, the Metropolitan Nashville Police Department (MNPD) currently provides two (2) options for police personnel to utilize when communication is necessary with non-English speaking persons:

A. Utilization of on-duty bilingual personnel; and

B. The Language Line.

18.90.020 Personnel Requiring a Translation

A. On-Duty Bilingual Personnel

Departmental personnel needing a translation will attempt to identify the language that is being spoken. Once the language is determined, officers shall utilize bilingual, on-duty personnel to interpret if available. Provided, the on-duty personnel are available to assist within a reasonable response time; based upon the facts and circumstances of the situation. If on-duty personnel can assist, they shall contact their supervisor for permission to respond to the requesting officer's location to provide the needed services.

B. Language Line

1. When translation services are needed under emergency conditions, personnel may utilize the Language Line Service, which is an independently maintained interpreter service. Due to the fees charged for use of this service, personnel must adhere to the following criteria before utilizing this service:

    a. No on-duty bilingual personnel that can speak the required language are available.

    b. Personnel shall obtain prior approval by their immediate

supervisor.

c. Personnel shall use the Language Line service only during an emergency incident or urgent situation, and not for protracted interviews or interrogations.

2. The following are generally allowable uses of the Language Line:

   a. Obtaining information from victims of crimes,

   b. Descriptions of missing persons,

   c. Brief interviews of witnesses, etc.

3. The following are generally **prohibited** uses of the Language Line:

   a. Detailed interviews of witness,

   b. Interrogations of suspects, and

   c. Working non-serious traffic accidents, etc.

4. Language Line Procedures:

   a. Personnel shall contact their immediate supervisor for approval and to acquire the Language Line account number necessary to make the call to the Language Line Service.

   b. When calling the Language Line, the following information must be provided to obtain service:

      (1) The language to be translated.

      (2) Client identification number. The employee's supervisor can provide his number after the supervisor approves use of the service. Employees shall ensure the security of this number to prevent unauthorized use.

      (3) The organization name, which is listed as the Metropolitan Police Department of Nashville.

      (4) The personal code, which is the requesting employee's employee number.

See Addendum I for information about current vendors and access numbers for Language Line use

ADDENDUM I

Language Line Vendors a Basic Guide:

Voiance Language Services – 1st choice
Language Line Services – 2nd choice

A reminder to follow the guidelines listed in **18.90 Interpreter Services – Cell Phone Translators & Language Line**

Voiance (Primary)

The MNPD has two interpreter accounts (phone numbers) with the Voiance Language Services:

1. 911 Emergency account for emergency situations only
2. Non-Emergency account for all other language services needed

911 emergency account instructions:

- Dial 1-844-292-4210 to access the interpretation services
- Press “1” for Spanish press “0” for all others
- If at any time you wish to speak with a CS representative you can press “0”

Non-Emergency account instructions:

- Dial 1-866-998-0338
- When prompted enter account number: 21243
- Second prompt enter the 4-digit pin number: 0187
- Say the language needed
- Select if you would like to add an additional person to the call
- When the interpreter comes on the line, give the interpreter a brief explanation of the call

Language Line Services (Secondary)

- Dial 1-800-523-1786 and be prepared to provide:
    - What language you need, and
    - Where you are calling from: Client ID# 681341 or Metro Nashville Police Dept

18.100 Effective Communications with Individuals with Disabilities

18.100.010 Generally

A. The Metropolitan Government and the United States Department of Justice have entered into an agreement to achieve compliance with Title II of the Americans with Disabilities Act of 1990. As part of the agreement, the Metropolitan Government will issue specific communication policies for effective communication. These policies have been agreed to by the Justice Department and the Metropolitan Government and are binding for the entire Metropolitan Government.

B. It is the policy of Metropolitan Government of Nashville and Davidson County to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others. The Metropolitan Government will furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a program, service, or activity conducted by the Metropolitan Government. In determining what type of auxiliary aid or service is necessary, the government will give primary consideration to the requests of the individual with disabilities.

C. “Auxiliary aids and services” includes:

1. Qualified interpreters, note takers, transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDD's), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments; and

2. Qualified readers, taped texts, audio recordings, Brailed materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments.

D. Notification

1. A list of available contact persons can be found at 18.100.050. If you do not know which department is sponsoring or responsible for providing the program or service that requires the provision of auxiliary aids or services to ensure effective communication, contact the Metropolitan Government ADA Coordinator.

2. Requests for auxiliary aids or services should be made by the public in advance of the meeting, hearing or other program, service, or activity provided by the Government. For public meetings and hearings, the ADA contact person should be notified at least one week in advance. For on-going services and programs, the ADA contact person should be notified at least 48 hours in advance. For emergencies or urgent requests, the responsible ADA contact person or the Metropolitan Government ADA Coordinator should be notified immediately. The best effort to fulfill the request will be made.

Example 1:

The Precinct Community Coordinator is asked to come to the Women's Auxiliary Group to speak on safety issues concerning parking lot safety. The officer responding to the request for the aforementioned program will make contact with the Women's Auxiliary Group and ask if they have anyone in their audience that would require an "auxiliary aid or service" as it is defined under this policy. Should the group request an "auxiliary aid or service", the officer should notify the department ADA contact person at least one week in advance. Furthermore, the Auxiliary Women's Group will be required to publish in their program notification that the Police Department will accommodate any members with communication disabilities. This notification is required by Title II of the Americans with Disabilities Act of 1990 and will include the notification timeline and procedure as described in the order.

Example 2:

West precinct officers attend the monthly neighborhood watch meeting of the West End Neighborhood Alliance. One of the members of the Alliance suffers from a hearing disability. The officers know that this disability exists, and that the member is likely to be present at each meeting. The officers should notify the ADA departmental contact person at least 48 hours in advance. Once again, the Neighborhood Alliance must publish in its newsletter or invitation to its members that the Police Department will accommodate any members with communication disabilities.

Example 3:

East Precinct is going to host an open house around the time of National Night Out Against Crime. In order to comply with Title II of the Americans with Disabilities Act of 1990, the invitations to the public must state that the Department will furnish the appropriate

auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in and enjoy the benefits of the open house. The invitation must also state that such requests for auxiliary aids by members of the public should be made at least one week in advance to the host of the event, (e.g. Precinct Commander). The host of the event will then immediately notify the department ADA contact person, who will be responsible for notifying the requesting individual with a disability of the proposed auxiliary aid or service.

NOTE: For all activities, meetings, hearings, programs or services provided by a member of this department an ADA notification must be made. Regardless of whether the department sponsors the event or simply participates as a guest, the public must be made aware in advance that requests for auxiliary aids or services may be made and received to ensure effective communication.

E. Government Response

1. When an auxiliary aid or service is required to ensure effective communication, the government will provide an opportunity for an individual with disabilities to request the auxiliary aid or service of their choice. Primary consideration shall be given to the preference expressed by the individual. "Primary consideration" means that the government will honor the choice, unless it can show that another equally effective means of communication is available, or that the requested source would result in a fundamental alteration in the service, program, or a financial burden. The ADA contact person will consult with the individual with the disability to identify the nature of the aid or service and determine the most effective way to accommodate the request. The ADA contact person may ask the requesting individual clarifying questions to obtain a particular auxiliary aid or service.

2. Within 48 hours after the request, the ADA contact person will, in writing, notify the requesting individual with a disability of the proposed auxiliary aid or service to be provided. A copy of the proposal will be sent to the Metropolitan Government ADA Coordinator.

F. Grievance Procedures

If the requesting individual with a disability is dissatisfied with the ADA contact person's proposed auxiliary aid or service, the individual is encouraged to file a grievance with the Metropolitan Government ADA

Coordinator. The coordinator will promptly contact the individual in person or by telephone and attempt to resolve the grievance within one week.

18.100.020 Guidelines for Training on Effective Communication in Police Situations Involving Individuals with Hearing Impairments

A. Successful police contact with citizens is characterized by effective communication between the parties whether it is a suspect, victim, or complainant with whom the officer is talking. As such, police officers encountering an individual with hearing impairment should use appropriate auxiliary aids and services whenever necessary to ensure effective communication with the individual.

B. Auxiliary aids and services include qualified interpreters, written materials, note pads, and other effective methods of making aurally delivered materials available to individuals with hearing impairments.

C. When an auxiliary aid or service is required to ensure effective communication, the Metropolitan Government Police Department must provide an opportunity for individuals with hearing impairments to request the auxiliary aids and services of their choice and must give primary consideration to the choice expressed by the individuals. "Primary consideration" means that the Metropolitan Government Police Department must honor the choice, unless it can show that another equally effective means of communication is available, or that use of the means chosen would result in a fundamental alteration in the nature of its service, program, or activity or in undue financial and administrative burdens.

D. Police contact with citizens occurs most frequently during routine traffic stops. In situations involving drivers who are deaf and use sign language for communication, the officer should use appropriate sign language to initiate the exchange with the driver and should explain in writing the necessity for a stop and citation if the driver is to be charged with a traffic violation. The officer may not ask a family member or friend of the driver to interpret.

Example: An officer sees a vehicle run a stop sign. The officer pulls the vehicle over and when approaching the vehicle realizes that the driver is attempting to communicate with the officer by way of sign language. If the officer has received training in sign language, he/she will communicate to the driver that he/she will communicate by written means. If the officer has not been trained in sign language, he/she will use pen and paper to communicate with the driver. The officer will not ask a family member or friend of the driver to interpret.

1. If the officer is successful in communicating with the driver by way of note pad, he/she may issue the citation and release the driver.

2. If the officer is unsuccessful in communicating with the driver by way of sign language or writing and the driver can be cited and released without being questioned, then the driver does not need to be provided with an interpreter.

3. If the officer is unsuccessful in communicating with the driver by way of sign language or writing and the driver does not understand the nature of the non-criminal (example Metro Citation) infraction, then the officer should contact his/her immediate supervisor. The supervisor should use discretion as to whether to call a qualified interpreter to the scene or whether to issue a warning rather than a citation.

4. However, if the officer approaches the vehicle and sees, for example, a felony amount of crack cocaine on the back seat and arrests the driver based upon probable cause, the officer does not need to provide a qualified interpreter if he does not need to interview the driver prior to, or subsequent to, the arrest.

5. If however, under the felony cocaine example, the officer is unable to relate the nature of the criminal charge to arrestee by sign language, note pad or other means, the arrestee should be transported to booking and held until the arresting officer can convey the information to the arrestee through a qualified interpreter.

These guidelines address only those situations where a police officer, after consulting with the individual with a hearing impairment, determines that the services of a qualified interpreter are necessary to ensure effective communication.

NOTE: When an officer learns that an auxiliary aid or service is necessary to ensure effective communication with an individual with a hearing impairment, the department will allow the individual to request the auxiliary aid or service of their choice and must give foremost consideration to the individuals choice. This means that the department will honor the individual’s choice unless: it would cause an undue financial and administrative burden on the department; it would significantly change the nature of the service, program or activity or another equally effective means of communication is available.

E. Arrest Upon Probable Cause Without An Interview

1. In circumstances where an individual without a hearing impairment would have been arrested on probable cause without an interview, then a suspect with a hearing impairment in the same situation usually does not need to be provided with a qualified interpreter.

2. However, a qualified interpreter may be required if an officer is unable to convey to the arrestee the nature of the criminal charges by communicating on a note pad or by using another means of communication. The arrestee should be transported to a holding cell where either the arresting officer or the transporting officer can convey the information through the interpreter when he or she arrives.

F. Interrogating an Arrestee With a Hearing Impairment

If an officer cannot effectively inform the arrestee of the Miranda warnings without the use of an interpreter, then the officer must secure the services of a qualified interpreter in order to communicate accurately the warnings to the arrestee prior to any interrogation. The interrogation will not proceed until the services of an interpreter are secured.

G. Issuance of Appearance Ticket

In circumstances in which an individual without a hearing impairment would be issued an appearance ticket without being questioned by the investigating officer, then a suspect with a hearing impairment in the same situation does not need to be provided with a qualified interpreter. If an officer has stopped a suspect for committing a non-criminal infraction and if the officer is unable to convey to the violator the nature of the non-criminal infraction by communicating on a note pad or by using another means of communication, then the officer should notify his/her immediate supervisor and they should use discretion as to whether to call a qualified interpreter to the scene or whether to issue a warning rather than a citation.

H. Interviewing a Victim or Critical Witness with a Hearing Impairment

If an officer is able to communicate effectively by writing questions on a note pad and having the victim or witness with a hearing impairment write his or her responses, then the officer may proceed with the interview using a note pad. However, if an investigating officer is

unable to communicate effectively with a victim or critical witness by using a note pad or some other means of communication other than a qualified interpreter, then the investigating officer must provide the victim or critical witness with a qualified interpreter.

I. Obtaining Qualified Interpreters

Officers will contact their immediate supervisor who will arrange for a qualified interpreter from the approved contractor list, and request that a qualified interpreter be provided. If the person requests an interpreter other than from the contractor, the request should be honored if the interpreter is available and qualified.

J. Reports/Evidence

All identifying information on the interpreter must be included on an offense or supplemental report, including the interpreter's name, the time the interpreter was called, and his/her time of arrival and departure. All written questions and responses between and among police officers and persons with hearing impairments must be treated as evidence and handled accordingly.

18.100.030 Policy on Access to the Department of Emergency Communications Services

A. Dialing 911 is the most familiar and effective way Americans have of finding help in an emergency. The Americans with Disabilities Act (ADA) requires all Public Safety Answering Points (public safety answering points) to provide direct, equal access to their services for people with disabilities who use teletypewriters (Teletypewriters), which are also known as 'telecommunications devices for the deaf (TDDs)."

B. Direct Equal Teletypewriter Access

1. General Requirements for Telephone Emergency Service Providers:

a. The ADA regulation requires 9-1 -1 or other telephone emergency service providers to provide teletypewriter users with: direct access; and an opportunity to benefit from the emergency services that is equal to the opportunity afforded others.
b. Direct access means that public safety answering points can directly receive teletypewriter calls without relying on an outside relay service or third-party services.

c. Equal access means that the telephone emergency services provided for teletypewriter users are as effective as those provided for persons who make voice calls, in terms of:

(1) Response time;
(2) Response quality;
(3) Hours of operation; and
(4) All other features offered (e.g., automatic number identification, automatic location identification, automatic call distribution).

d. Direct equal access requires public safety answering points to have the appropriate equipment to communicate with people who use teletypewriters. It also requires them to use the proper procedures and practices when teletypewriter calls are received.

2. Equipment

In order to afford equal access to teletypewriter users, every call-taking position within a public safety answering point must have its own teletypewriter or teletypewriter-compatible equipment. Public safety answering points must have systems that enable call takers to handle teletypewriter calls as properly, promptly, and reliably as voice calls.

3. Other Requirements for Teletypewriter Equipment – Maintenance and Back up

The ADA regulation contains a specific provision requiring that covered entities maintain their accessibility features and equipment in operable working condition. In addition to this specific maintenance requirement, the ADA's equal access requirement obligates public safety answering points to implement equally effective procedures for maintenance and back-up capability for teletypewriter equipment as they provide for voice telephone equipment.

4. Switching Between Voice and Teletypewriter Modes

All call takers must have the capability to switch back and forth easily from teletypewriter mode to voice mode during the same call. This capability is necessary especially for silent calls, since call takers are required to first query the line by voice and then quickly switch to query the line by teletypewriter. This capability is also

necessary for voice carryover and hearing carryover, which are described below. Voice carryover and hearing carryover shorten the lengths of calls that would otherwise be conducted exclusively by typing. Call takers who use stand-alone Teletypewriters can switch from teletypewriter mode back to voice mode simply by removing the telephone handset from the teletypewriter couplers. Teletypewriter-compatible consoles for call takers should have built-in switching capability.

5. Voice Carryover

It is a communication hybrid of teletypewriter and voice. Voice carryover allows a person with hearing loss to speak directly to the call taker and read the response that is typed back. Many persons who became deaf or hard of hearing later in life prefer to speak instead of type. They use what is called voice carryover. With voice carryover, the caller speaks directly into the phone, and the call taker types back via teletypewriter to the caller. Voice carryover can be accomplished with standard stand-alone teletypewriter equipment simply by having the call taker alternate between listening on the handset when the caller is speaking and placing the handset in the teletypewriter couplers to type a response.

6. Hearing Carryover

People with speech impairments who are not deaf or hard of hearing often prefer hearing carryover. Hearing carryover allows them to type their words on a teletypewriter to call takers and hear call takers' spoken responses through their handset. Hearing carryover can be accomplished by a call taker using standard stand-alone teletypewriter equipment by alternating speaking into the handset and placing the handset in the teletypewriter when the caller types a response.

7. Procedures for Handling Teletypewriter Calls

a. In addition to proper equipment, direct, equal access for teletypewriter calls requires that public safety answering points use effective procedures for recognizing and responding to teletypewriter calls. Recognizing teletypewriter calls/treating silent, open lines as potential teletypewriter calls
b. All call takers must be able to recognize and handle teletypewriter calls properly. There are three types of teletypewriter calls a call taker may receive. Some Teletypewriters emit a recorded spoken announcement to the

call taker that a teletypewriter call is being placed, such as "hearing impaired caller use teletypewriter." Other times, teletypewriter callers may press teletypewriter keys to emit audible tones and more quickly notify the call taker that a teletypewriter call is being placed. Most often, however, a person using a teletypewriter will make a call that is perceived by the call taker as a silent, open line call. This is because the caller's equipment does not recognize that the call has been answered until the call taker sends a teletypewriter response.

c. The only way for public safety answering points to properly identify all teletypewriter calls is for call takers to recognize teletypewriter tones and to query every silent, open line call with a teletypewriter to determine if it is a teletypewriter call after it has been queried by voice.

8. Conducting Teletypewriter Calls

After teletypewriter calls are recognized, call takers must effectively communicate with callers during the calls. Effective communication by teletypewriter will require call takers to be familiar with the use of teletypewriter equipment and teletypewriter protocols.

9. Training

a. Public safety answering points must train their call takers to effectively recognize and process teletypewriter calls. Call takers must be trained in the use of teletypewriter equipment and supplied with information about communication protocol with individuals who are deaf or hard of hearing, or who have speech impairments. For instance, callers who use American Sign Language use a syntax that is different from spoken English. In addition, in teletypewriter communication, certain accepted abbreviations are frequently used.

b. The ADA does not specify how call takers must be trained, but the department believes that the following are essential to proper training:

(1) Training should be mandatory for all personnel who may have contact with individuals from the public who are deaf, hard of hearing, or who have speech impairments.

(2) Public safety answering points should require or offer refresher training at least as often as they require or offer training for voice calls, but at a minimum, every six months.

10. Comprehensive Training Should Include:

    a. Information about the requirements of the ADA and Section 504 of the Rehabilitation Act for telephone emergency service providers;
    b. Information about communication issues regarding individuals who are deaf or hard of hearing, or who have speech impairments, including information about American Sign Language;
    c. Practical instruction on identifying and processing teletypewriter calls, including the importance of recognizing silent teletypewriter calls, using proper syntax, abbreviations, and protocol when responding to teletypewriter calls and relayed calls; and
    d. Hands-on experience in teletypewriter communications, especially for new call takers, as part of their initial training orientation.
    e. To ensure the effectiveness of training, public safety answering points may want to consult the Emergency Access Self-Evaluation program, published as a manual by Telecommunications for the Deaf, Inc., under a Department of Justice grant. The EASE manual, which was reviewed by the Department, can be obtained for a fee by calling TDI at (301) 589-3786 (voice), (301) 589-3006 (teletypewriter), or (301) 589-3797 (FAX).

11. Testing

    a. 911 experiences have shown that frequent testing is essential to ensure direct, equal access. Testing call takers and their equipment is also the one of the most effective ways to ensure compliance with the ADA's requirement that accessibility features are maintained in operable working condition. The tests should be designed to ascertain whether teletypewriter equipment functions properly and whether personnel have been adequately trained to recognize teletypewriter calls quickly, to operate teletypewriter equipment, and to conduct teletypewriter conversations.
    b. To test whether call takers have been trained adequately to recognize teletypewriter calls, a public safety answering point should conduct two types of test calls--silent, open line calls in

which no tones are emitted and calls in which the caller introduces the call by transmitting teletypewriter tones. Tests should be unannounced.

18.100.040 Legal Assistance and Support

Assistance and advice regarding compliance with the Americans with Disabilities Act may be obtained from the department ADA coordinator or the Metropolitan Department of Law.

18.100.050 Contact Persons

A. Metropolitan Government Americans with Disabilities Coordinator:
ADA Coordinator
222 3rd Avenue North
Nashville, TN 37201
Phone: (615) 862-6640
FAX: (615) 862-6654

B. Metropolitan Police Department Americans with Disabilities Contact Person

Human Resource Manager
Phone: 615-862-7351
FAX: 615-880-2997

C. Contract Vendors Who Provide Interpreter Services

Bridges
Monday – Friday 0800-1700 615-248-8828
All other hours of service: 615-244-0979

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Public Defender Year: 2026

Title VI Coordinator: Sherlaine Emmons Form Completed By: Sherlaine Emmons

Form Completion Date: Click or tap to enter a date.

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Public Library Year: 2026

Title VI Coordinator: Susan Drye Form Completed By: Susan Drye

Form Completion Date: 7/9/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Public Library New Employee Orientation, then annually online.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via departmental email. All information that is needed to push out to the library system is posted on the Public Library's Intranet, INK. Also, the form with our language access list is on INK.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

The notice is posted at all library locations (22 facilities)

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other If the library receives a Title VI complaint, either library administration or library HR will refer the complainant to the Metro Human Relations Commission.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☑ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Nashville Public Library (NPL) has plans to develop a written Language Access Plan in FY27.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☑ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
Joyce Searcy	Black or African American
Keith Simmons	White
Rosalyn Carter	Black or African American
Charvis Rand	Black or African American
Katy Varney	White
Dr. Nadine De La Rosa	Black or African American
Kate Ezell	White

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Nashville Public Library Board is comprised of 7 members, recommended by the mayor, and approved by a majority of Metro Council. They are appointed to 4-year terms and annually the board members vote on the Chair, Vice-Chair, and Secretary.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Sheriff (DCSO) Year: 2026

Title VI Coordinator: formerly- Meshawn Cook currently- Kristi Cole Form Completed By: Kristi Cole

Form Completion Date: 6/10/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

In person, during New Hire Orientation

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via Title VI policy and New Hire Orientation training

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Information is located at the entrance to all public locations and DCSO electronic information boards

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☑ Other Policy 1-1.15

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
3/20/2026	Completed	None	Inmate Mario Gray filed a complaint over his mail alleging that he was being treated unfairly because it was scanned and sent to him. This is our mail policy and he was treated no differently than any other inmate receiving this type of mail.
4/27/2026	Completed	None	Inmate John Smiley filed a complaint that he was refused food while he was in Booking. When I investigated, he was offered a sandwich at least twice as we offer all inmates in Booking.
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

NASHVILLE SHERIFF
DAVIDSON COUNTY SHERIFF'S OFFICE
Daron Hall, Sheriff

POLICY
The Davidson County Sheriff's Office (DCSO) complies with Title VI of the Civil Rights Act of 1964, which prohibits exclusion from participation in, denial of the benefits of, or discrimination in, program participation on account of race, color, or national origin. The agency takes reasonable steps to provide inmates/residents and the public with limited English proficiency (LEP) equivalent access to DCSO-managed programs and services, and ensures they have equivalent opportunities to participate in or benefit from efforts to prevent, detect, and respond to sexual abuse/harassment. PREA 115.16b

Although this policy is written from a correctional perspective about inmates and officers, the procedures also generally apply to the residential facility and its residents and technicians.

DEFINITIONS
Language Line – A resource that provides translation services via the telephone.

Limited English Proficiency (LEP) Individual – A term that describes people who do not speak English as their primary language and have limited ability to read, write, and/or understand English.

Qualified Interpreter – A person certified or registered to translate the words someone is using effectively, accurately, and impartially with any necessary specialized vocabulary.

Prison Rape Elimination Act (PREA) – A federal law related to the elimination, reduction, response to, and detection of sexual abuse/harassment of inmates.

Title VI of the Civil Rights Act of 1964 – A federal law requiring 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 financial assistance."

PROCEDURAL GUIDELINES
The Title VI coordinator for inmates and the public is a member of the standards division and investigates Title VI complaints as outlined below.

DCSO's Title VI coordinator for employees is a member of the human resources/employee services (HR/ES) division. The DCSO investigates employee Title VI complaints as outlined in DCSO Policy # 1-1.300, "Workplace Harassment/Discrimination."

The DCSO provides resources such as contracted language line services, interpreters, signs, and bilingual literature to LEP inmates, including those who speak languages other than Spanish. The intake officer identifies LEP arrestees and stamps their paperwork accordingly. The prisoner processor adds that information to the arrestee's record in the Jail Management System (JMS) during processing.

In the booking area, short audio-visual presentations in English and Spanish explain basic facility rules and procedures, how to report sexual abuse/harassment, and how to access services. The DCSO makes the inmate handbook available on inmate tablets/kiosks in English, Spanish, and Arabic in correctional housing areas. Residents receive copies of program rules in the appropriate language during orientation.

The DCSO offers programs and services such as treatment and integrated education and training in English and other languages as required. Community partner representatives offer twelve-step meetings and religious programs in foreign languages if available.

The DCSO communicates information about accessing health care services and the grievance system verbally and in writing in a language easily understood by the inmate.

Language Line
Employees may access information about language line services via a designated folder on the DCSO shared drive. The folder contains a language identification guide, directions on how to use the language line, and tips for working with an interpreter.

An employee obtains approval from the area supervisor before utilizing the language line. Contracted vendors are required to provide their own access to appropriate translation services.

Personnel document calls to the language line in the "Language Line Log" designated folder on the shared drive. The log includes the date of the call, caller's name, inmate's name/OCA number or name of civilian needing the service, the facility and area where the call originated, the language needing translation, and the interpreter's identification (ID) number.

Interpreters
The DCSO does not rely on inmate interpreters, readers, or other inmate assistance when dealing with sexual abuse/harassment complaints unless an extended delay in obtaining an effective

interpreter could compromise safety, the performance of first-responder duties, or the investigation of the allegation. PREA 115.16c

When needed, the DCSO Title VI coordinator for inmates contacts the Metropolitan Government ("Metro") Title VI coordinator to arrange for qualified interpreter services from outside the agency. For information about the process an attorney uses to request access to a facility for a qualified interpreter to accompany the attorney/designee, see DCSO Policy # 1-5.420, "Inmate Visitation," and Policy # 1-7.103, "Resident Visitation."

DCSO Title VI Coordinator for Inmate/Public Complaints

A member of the standards division coordinates non-employee Title VI functions by conducting complaint investigations and training. The coordinator/designee conducts Title VI compliance training during new-hire orientation, and employees attending annual core training watch an online video on the topic. Standards division personnel monitor Title VI compliance during regular facility inspections and training, and submit reports to the Metro Title VI coordinator annually and as requested.

Complaints

Individuals may file Title VI complaints with the DCSO or the Metro Title VI coordinator, who is a member of the Metro Human Relations Commission. The individual may file a Title VI complaint up to 180 days after the fact.

An inmate services specialist (ISS) provides the "Civil Rights Title VI Discrimination Complaint" form upon an inmate's request. The ISS reviews the complaint, provides a copy to the inmate, and forwards it to the standards division if it is based on race, color, or national origin. For residents, technicians perform the ISS functions outlined above. Standards division personnel log all Title VI complaints and their resolutions in the Title VI log on the shared drive. The log includes information such as the complainant's name, date of complaint, and basis for complaint.

Within three working days of receiving a complaint, the DCSO coordinator/designee acknowledges receipt of the complaint in writing to the civilian complainant or via an email to the ISS/technician.

The DCSO coordinator/designee reviews the complaint and investigates as needed, completing it within 60 days.

The coordinator/designee does not investigate complaints that are clearly not related to race, color, or national origin, but does include them in the Title VI log. The coordinator/designee writes "Not a Title VI Discrimination Complaint" on the form, and returns it to the complainant with a memo that explains what Title VI includes and informs the complainant how to pursue the complaint.

If the investigation determines a Title VI violation occurred, the director/designee sends a copy of the investigative packet to administrative counsel and the deputy chief over the area in question, one of whom will implement changes to address the Title VI violation, and make additional notifications as needed. Administrative counsel review the investigative packet before standards division personnel forward it to the Metro Title VI coordinator.

The DCSO coordinator provides a copy of the final complaint resolution to the complainant, the ISS/technician, and the facility administrator. Standards division personnel keep a copy on file and forward one to the records division for the inmate's institutional record.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Social Services Year: 2026

Title VI Coordinator: Yuri L. Hancock Form Completed By: Yuri L. Hancock

Form Completion Date: 6/1/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Training is provided during the Onboarding process and New Hire Orientation.

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We post signage in the common areas of the building in various languages; we utilize the Language Line for interpreter services; we also provide training during new hire orientation as well as at the annual program in-service trainings.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Main Lobby, Break room, Congregate Meal Sites and Website

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? None

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Metro Social Services has no formal written plan, however, we follow the practice of utilizing the most recent vendor list for interpreter and translation services for the customer. HR staff also attends annual training for guidance on the development of a language plan. Last training attended was October 2025.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Sports Authority Year: FY26

Title VI Coordinator: Melissa Wells Form Completed By: Melissa Wells

Form Completion Date: 6/12/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Access is provided to training offered by the Metro Human Relations Commission and resources provided.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Information is shared with staff through links to resources.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

150 2nd Avenue, North, Nashville, TN 37201.

Do you provide this in languages other than English?

☑ Yes ☐ No If requested.

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other Information is provided through postings and upon request.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No Upon request.

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☐ No N/A

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☐ No N/A

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☐ No N/A

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: State Fair Board Year: 2026

Title VI Coordinator: Kristi Harris Form Completed By: Kristi Harris

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☐ Yes ☑ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☑ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☑ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: State Trial Courts Year: 2026

Title VI Coordinator: Tim Curenton Form Completed By: Tim Curenton

Form Completion Date: 6/12/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

I review the PDF provided by the State for the Coordinator's Training.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

It is posted in the Administrative Office Hallway

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

It is posted in the Administrative Office Hallway

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? None

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Administrative Policies and Procedures	Policy 1.6– Reviewed/revised by SEB 01.13.2025
Davidson County Residential Recovery Court	
	Page 1 of 1
Subject: **Title VI of the Civil Rights Act of 1964 and Limited English Proficiency (LEP)**	

I. **APPLICATION:** To all DC4 Staff.

II. **PURPOSE:** To define Title VI and LEP and ensure all staff know about Title VI and LEP procedures.

III. **POLICY:** The Program has a procedure and plans to ensure compliance with Title VI and all other laws that protect the rights of participants and staff.

IV. **PROCEDURES:**

1. The Program Director will ensure that all staff (regular, contract, and volunteers) are trained on Title VI upon employment and annually thereafter.
2. A Title VI coordinator for the department is identified.
3. A Title VI coordinator or a trained departmental staff will conduct training.
4. The training will consist of but is not limited to defining Title VI of the Civil Rights Act of 1964, rights under Title VI, how to file a discrimination complaint, including filing deadlines, and identifying websites to download complaint forms.

I. **ATTACHMENTS: Acknowledge** receipt of Title VI Rights form, copy of Title VI poster, complaint form, and LEP procedures.

Davidson County Drug Court
LEP POLICY & PROCEDURE

Subject: LEP POLICY	**References:**
Approved By:	**Forms & Attachments:**
Effective/Revised Date: 07/01/2024	**Policy #:**

PURPOSE: To assist clients in obtaining necessary interpreter services.

POLICY: Davidson Country Drug Court (DC4, a division of State Trial Courts) will provide services to individuals, who have the inability to speak, read, write, or understand the English language at a level that permits a client to interact effectively with DC4 staff.

As client needs present, every effort will be made to locate appropriate interpreters. State Trial Courts employs an interpreter/coordinator who would be our first point of contact to either serve as an interpreter or facilitate the service of an appropriate interpreter. This interpreter can be contacted through Dana George, Judicial Assistant to Judge Jennifer Smith. Davidson Country Drug Court will also utilize The Language Line (www.languageline.com) if an interpreter cannot be immediately designated.

DEFINITION: LIMITED ENGLISH PROFICIENCY, "LEP"- Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

- Executive Order 13166 (August 11, 2000) requires all agencies that provide federal financial assistance to issue guidance on how recipients of that assistance can take reasonable steps to provide meaningful access consistent with Title VI and the Title VI regulations.
- Not providing services that are accessible constitutes discrimination based on national origin.

TITLE VI OF THE 1964 CIVIL RIGHTS ACT



The Law

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 financial assistance."

Applicability

Title VI covers all agencies receiving federal funds. Some examples include student aid, employee training, grants, loans, property, personnel loans, tax incentives, and technical assistance.

Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a Complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or a third party within 90 days from the date of the alleged discriminatory act.

Complaints should be directed to
Metro Human Relations Commission
404 James Robertson Pwky – Suite 130
Nashville, TN 37219
Phone Number: (615) 880-3370

It shall be against the policy of the Metropolitan Government to discriminate against an individual based on that person's race, color, or national origin.

This policy applies to applicants for employment and current employees as well as sub-recipients and subcontractors of the Metropolitan Government Department that receive Federal Funding.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Trustee Year: 2026

Title VI Coordinator: Nicholas Garvin Form Completed By: Same

Form Completion Date: 5/18/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Annual Staff Continuing Education/Training Day

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Front and Back House printed material and annual training

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Placed in lobby, only public space for office with copy of multiple languages places at receptionist desk.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Need some assistance to finalize and organize current LAP practices into one doc/plan.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Waste Services Year: 2026

Title VI Coordinator: Dedric Norris Form Completed By: Dedric Norris

Form Completion Date: 7/9/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☑ No

If so, how is the training provided?

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☑ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☑ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☑ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☑ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other N/A

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 1

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
8/1/2025	Completed	None	A employee alleged gender discrimination. An investigation was completed with no findings.
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Our Department is taking steps to implement a program by the start of 2027.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

The Department of Waste is committed to encouraging the participation of minorities on advisory and review committees through equitable recruitment and selection practices. Committee membership opportunities are broadly publicized, and the Department actively seeks qualified candidates from underrepresented racial and ethnic groups. Selection is based on relevant expertise, experience, and the ability to contribute to the committee's work, while promoting diversity of perspectives and backgrounds. The Department also reviews committee composition periodically to identify opportunities to improve representation and ensure committees reflect the diversity of the communities they serve. These efforts are consistent with the Departments commitment to equal opportunity, inclusion, and nondiscrimination.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Water Services Year: 2026

Title VI Coordinator: Lenair Koonce Form Completed By: Lenair Koonce

Form Completion Date: 6/12/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided? Training is Provided during New Hire Orientation

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☑ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We posted the information throughout all areas

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted: We post in all of Metro Water Services Buildings

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☑ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☑ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☑ Other Whenever information is requested we send it out.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☑ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? None

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☑ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response. **MWS Language Access plan we utilize a contract with LTC and Voiance to provide these services.**

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: WeGo Year: 2026

Title VI Coordinator: Felix Castrodad Form Completed By: Philip Randall

Form Completion Date: 6/15/2026

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states 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 financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☑ Yes ☐ No

Does your department provide Title VI training to all new employees?

☑ Yes ☐ No

If so, how is the training provided?

Presentation and videos during onboarding orientation

☐ Not Provided
*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☑ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Posted on bulletin boards in all building facilities and inside all buses and train. Title VI program is available on the agency's website

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☑ Yes ☐ No

List all locations where the notice is posted:

Admin and Maintenance facilities. On all WeGo buses, on WeGo Star train, at Elizabeth Duff Transit Center at WeGo Central, Dr. Ernest Rip Patton, Jr. North Nashville Transit Center, and the Hillsboro Transit Center.

Do you provide this in languages other than English?

☑ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

The forms and process for filing complaints can be accessed at https://www.wegotransit.com/about-us/civil-rights/

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☑ Posted Signs ☑ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☑ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☑ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 2

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
5/5/2026	In Progress	None	Passenger in an electric wheelchair stated they were removed from the bus by police despite a valid fare and was passed by the next four WeGo Buses. The passenger filed a lawsuit that is currently being reviewed by our legal counsel. No action has been taken while the lawsuit is being reviewed.
4/6/2026	In Progress	None	Passenger claimed discrimination based on race and disability by bus drivers, supervisors and security personnel on buses and at WeGo bus station. The passenger has used abusive and aggressive language toward WeGo employees and has been removed from facilities on at least one occasion. He has been provided with the form and information for a Title VI complaint. The Title VI Coordinator contacted him about assisting him with filing the complaint but he continues to

			use abusive language when communicating with staff. No action has been taken because he hasn't filed the required form.
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☑ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Procedures outlined on attached Title VI Program, Chapter 2, Section E.B- Monitoring Subrecipients (Pages 25)

Link to Plan: https://www.wegotransit.com/assets/1/6/MTA_Title_VI_Program_2025_Final.pdf

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☑ Yes ☐ No

If Yes, please provide it by attaching it to this response.

The plan can be found here (Pages 15-24 https://www.wegotransit.com/assets/1/6/MTA_Title_VI_Program_2025_Final.pdf)

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☑ No

MTA Board members are appointed by the Mayor and confirmed by Metro Council. MTA does not select the board members.

If Yes, provide a table depicting the membership of that body broken down by race…

Name	Race
Gail Carr Williams (MTA Board of Directors)	Black or African American
Jessica Dauphin (MTA Board of Directors)	White
Aron Thompsom (MTA Board of Directors)	Black or African American
Kathryn Hays Sasser	White
Jeffrey Haynes	White
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Direct outreach to the impacted community with assistance from elected officials, business leaders, and community groups.

DEPARTMENT	TITLE VI COORDINATOR
Agricultural Extension	Katrice Jones Morgan
Arts Commission	Capri Harston
Assessor of Property	Cristi Scott
Beer Board	Terrence Darby Sr.
Circuit Court Clerk	Andre Walton
Clerk and Master	None Currently
Codes Administration	Julie Welch
Community Review Board	Keturah Barnett
County Clerk	Andrew Butler
Criminal Court Clerk	Amy Rooker
Criminal Justice Planning Unit	Samantha Terrell
Department of Emergency Communications	Lynette Dawkins
Election Commission	Rick Brown
Farmers Market	David Griffin
Finance	Kimberly Northern
Fire	Jamie Summers
General Services	Brian Pate
General Sessions Court	Gina Fox
Health (MPHD)	José Cruz
Historical Commission	Dustin Summers
Human Relations Commission	Gavin Crowell-Williamson
Human Resources	Erica Conn
Information Technology Services (ITS)	Leslie Ervin
Internal Audit	Bill Walker
Justice Integration Systems	Brandi Kyle
Juvenile Court	Jessica Robertson
Juvenile Court Clerk	Kimberly Dillard
Metro Action Commission (MAC)	Stephanie Mabry
Metro Nashville Public Schools (MNPS)	Brittany Edmonson
Metropolitan Clerk	Austin Kyle
Municipal Auditorium	Taneisha Alexander Harvey
Nashville Department of Transportation	Charles Boddie
Office of Emergency Management	Drusilla Martin
Office of Family Safety	LaToya Townsend
Office of Homeless Services	Antonia Whitfield
Parks	Leigh Anne Lee
Planning Commission	Randi Semrick
Police	Seth Waltenbaugh
Public Defender	Sherlaine Emmons
Public Library	Susan Drye
Sheriff (DCSO)	Kristi Cole
Social Services	Yuri Hancock
Sports Authority	Melissa Wells
State Fair Board	Kristi Harris
State Trial Courts	Kati Guenther and Debra Moody
Trustee	Nicholas Garvin
Waste Services	Dedric Norris
Water Services	Lenair Koonce
WeGo	Felix Castrodad

Metro Council

Public Roster

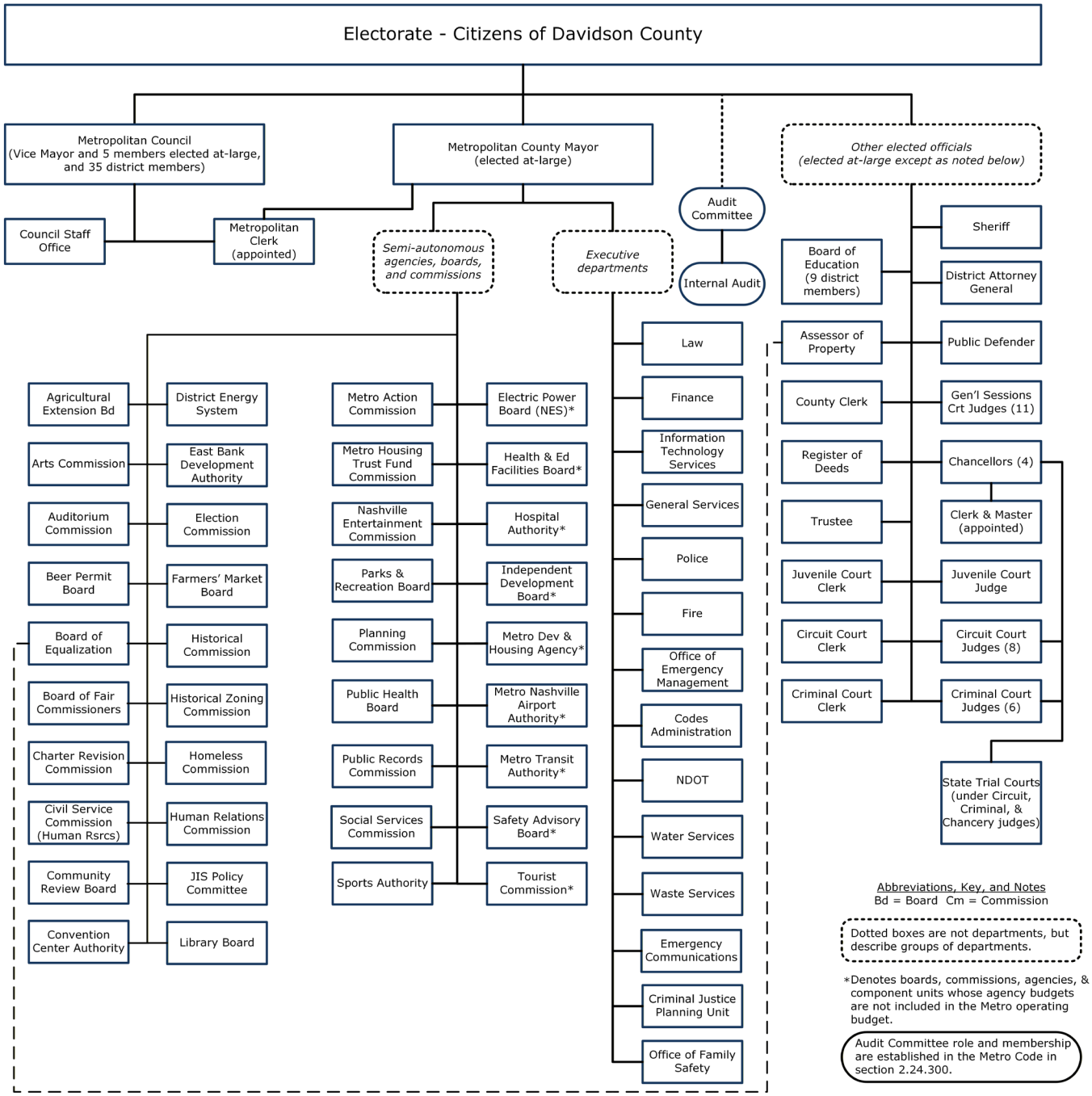
District	Last Name	First Name	Phone Number	Cell Number	Email
Vice Mayor	Henderson	Angie	615-880-3357	615-979-7943	angie.henderson@nashville.gov
At-Large 1	Suara	Zulfat	615-432-1341	615-585-2558	zulfat.suara@nashville.gov
At-Large 2	Porterfield	Delishia	615-432-1342	615-208-3068	delishia.porterfield@nashville.gov
At-Large 3	Evans Segall	Quin	615-432-1343		quin.evanssegall@nashville.gov
At-Large 4	Allen	Burkley	615-432-1344	615-383-6604	burkley.allen@nashville.gov
At-Large 5	Hill	Olivia	615-432-1345	615-456-3789	olivia.hill@nashville.gov
1	Kimbrough	Joy	615-432-1301	615-753-4797	joy.kimbrough@nashville.gov
2	Toombs	Kyonzté	615-432-1302	615-669-4390	kyonzte.toombs@nashvlle.gov
3	Gamble	Jennifer	615-432-1303	615-860-2602	jennifer.gamble@nashville.gov
4	Cortese	Mike	615-432-1304	615-200-7980	mike.cortese@nashville.gov
5	Parker	Sean	615-432-1305	615-339-6946	sean.parker@nashville.gov
6	Capp	Clay	615-432-1306	615-864-0008	clay.capp@nashville.gov
7	Benedict	Emily	615-432-1307	615 585-1258	emily.benedict@nashville.gov
8	Harrell	Deonté	615-432-1308	615-403-3564	deonte.harrell@nashville.gov
9	Hancock	Tonya	615-432-1309	615-398-1373	tonya.hancock@nashville.gov
10	Webb	Jennifer	615-432-1310	615-584-7244	jennifer.webb@nashville.gov
11	Eslick	Jeff	615-432-1311	615-300-4009	jeff.eslick@nashville.gov
12	Evans	Erin	615-432-1312	615-473-3076	erin.evans@nashville.gov
13	Bradford	Russ	615-432-1313	615-496-9983	russ.bradford@nashville.gov
14	Huffman	Jordan	615-432-1314	615-952-1519	jordan.huffman@nashville.gov
15	Gregg	Jeff	615-432-1315	615-579-6199	jeff.gregg@nashville.gov
16	Welsch	Ginny	615-432-1316	615-293-3365	ginny.welsch@nashville.gov
17	Vo	Terry	615-432-1317	615-854-8517	terry.vo@nashville.gov
18	Cash	Tom	615-432-1318	615-268-8748	tom.cash@nashville.gov
19	Kupin	Jacob	615-432-1319	615-200-7794	jacob.kupin@nashville.gov
20	Horton	Rollin	615-432-1320		rollin.horton@nashville.gov
21	Taylor	Brandon	615-432-1321	615-946-9700	brandon.taylor@nashville.gov
22	Weiner	Sheri	615-432-1322		sheri.weiner@nashville.gov
23	Druffel	Thom	615-432-1323	615-767-6458	thom.druffel@nashville.gov
24	Gadd	Brenda	615-432-1324	865-850-1109	brenda.gadd@nashville.gov
25	Preptit	Jeff	615-432-1325	615-942-0857	jeff.preptit@nashville.gov
26	Johnston	Courtney	615-432-1326	615-969-0901	courtney.johnston@nashville.gov
27	Nash	Bob	615-432-1327	615-337-7388	bob.nash@nashville.gov
28	Benton	David	615-432-1328		david.benton@nashville.gov
29	Ellis	Tasha	615-432-1329	615-578-2142	tasha.ellis@nashville.gov
30	Sepulveda	Sandra	615-432-1330		sandra.sepulveda@nashville.gov
31	Rutherford	John	615-432-1331	615-829-6004	john.rutherford@nashville.gov
32	Styles	Joy	615-432-1332	615-717-4017	joy.styles@nashville.gov
33	Lee	Antoinette	615-432-1333	615-669-8221	antoinette.lee@nashville.gov
34	Ewing	Sandy	615-432-1334		sandy.ewing@nashville.gov
35	Spain	Jason	615-432-1335	615-854-8912	jason.spain@nashville.gov

Organization Structure

The following organization chart presents a high-level view of Metro's structure. The structure of each department is shown in that department's budget description, later in this book.

Metro has a "strong-mayor" form of government, in which the popularly elected mayor is the city's chief executive and is independent of the Council. Both the Mayor and Council are elected on a nonpartisan basis.

Within this framework, operations are conducted by executive departments (reporting to the Mayor), independent elected officials (including the elected Board of Education), and appointed boards, commissions, and agencies. The variety of elected officials, boards, and commissions facilitate citizen involvement in the government's operations.



Title VI Report, FY25-FY26

GRANTOR	*TITLE*	*AWARD*	*GRANT END DATE*
DISTRICT ATTORNEY			
U.S. DEPARTMENT OF JUSTICE	Hispanic, Child and Family VOCA Grant 24	$756,612.00	6/30/2026
FINANCE DEPARTMENT			
U.S. DEPARTMENT OF HOMELAND SECURITY	Public Assistance Grant FEMA-4601-DR-TN 21-25		3/24/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	Flood Public Assistance 10- 25		4/29/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4476-DR-TN (3-3-2020) 20-25		6/27/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4514-DR-TN 20-24	$33,644,378.64	5/11/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4514-DR-TN 20-26	$8,255,411.00	5/11/2026
U.S. DEPARTMENT OF TREASURY	American Rescue Plan Funding 21-24		12/31/2024
U.S. DEPARTMENT OF TREASURY	LOCAL ASSISTANCE AND TRIBAL CONSISTENCY F	$100,000.00	12/31/2026
GENERAL SERVICES			
U.S. DEPARTMENT OF ENERGY	Historic Courthouse Energy Retrofit to Reduce Energy	$644,440.00	9/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Congressionally Directed Construction Proj	$2,200,000.00	9/29/2026
GENERAL SESSIONS CT.			
U.S. DEPARTMENT OF JUSTICE	General Sessions DUI Court 21-26	$352,425.00	9/30/2026
U.S. DEPARTMENT OF JUSTICE	Cherished HEARTS Court Expansion and Enhancment	$930,095.00	9/30/2027
U.S. DEPARTMENT OF JUSTICE	BJA FY24 Adult Treatment Court Program 24-28	$749,220.00	9/30/2028
HEALTH DEPARTMENT			
CENTER FOR DISEASE CONTROL AND PREVENTION	Public Safety Partnerships in High Impact Areas 25	$144,800.00	8/31/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	Community Health Workers for Public Health Response	$2,869,211.72	9/22/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Hlth Infrastructure Workforce	$843,396.00	11/30/2025

Friday, July 10, 2026

GRANTOR	TITLE	AWARD	GRANT END DATE
CENTER FOR DISEASE CONTROL AND PREVENTION	TB Control & Prevention 26	$1,562,900.00	6/30/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Public Health Emergency Preparedness and Crisis Res	$8,918,957.11	7/31/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Public Safety Partnerships in High Impact Areas 26	$144,800.00	8/31/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Health Infrastructure, Workforc	$843,396.00	11/30/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Tobacco Use Prevention & Control 25-27	$133,000.00	3/31/2027
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Health Infrastructure, Workforc	$9,421,679.00	11/30/2027
CENTERS FOR DISEASE CONTROL & PREVENTION	Public Safety Partnerships in High Impact Areas 27	$144,800.00	8/31/2027
ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 103 Inflation Reduction Act 23-26	$64,825.00	5/31/2026
HEALTH RESOURCES & SERVICES ADMINISTRATION	Ryan White Part A HIV Emergency Relief 24-25	$4,966,828.00	2/28/2025
HEALTH RESOURCES & SERVICES ADMINISTRATION	Presumptive Eligibility & Navigation Services 27	$539,700.00	6/30/2027
HEALTH RESOURCES & SERVICES ADMINSTRATION	Nashville Strong Babies II 26	$1,100,000.00	3/31/2026
HEALTH RESOURCES & SERVICES ADMINSTRATION	Ryan White Part A HIV Emergency Relief 26-27	$1,311,652.00	2/28/2027
HEALTH RESOURCES & SERVICES ADMINSTRATION	Ryan White Part A HIV Emergency Relief 25-28	$4,783,052.00	2/29/2028
TN DEPARTMENT OF TENNCARE	School Based Oral Disease Prevention 25-26	$1,840,200.00	6/30/2026
U.S. DEPARTMENT OF AGRICULTURE	Revised Women, Infants & Children 25-28	$15,954,952.00	9/30/2027
U.S. DEPARTMENT OF AGRICULTURE	Women, Infants & Children 25-28	$16,430,700.00	9/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Health Access & Navigation in Tennessee (	$2,041,200.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Immunization 21-26	$6,473,474.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Prenatal Presumptive Eligibility Program 25-26	$413,200.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	TN Breast & Cervical Screening Program 26	$333,100.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Family Planning 23-27	$5,685,500.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Prenatal Presumptive Eligibility Program 25-27	$619,800.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Public Health Emergency Preparedness 22-27 (Formerl	$4,118,973.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Sexually Transmitted Infection Prevention 23-26	$2,289,773.00	12/31/2027

GRANTOR	TITLE	AWARD	GRANT END DATE
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Health Promotion Services 25-29	$904,900.00	6/30/2029
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Supporting Prevention of Adolescents Resources Knowl	$500,000.00	6/30/2029
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Fetal Infant Mortality Review 26-30	$1,593,000.00	6/30/2030
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE	Community Health Access & Navigation in Tennessee 2	$2,041,200.00	6/30/2027
U.S. DEPARTMENT OF JUSTICE OJP	BJA OJP Community Based Violence Intervention & Pr	$1,988,190.00	9/30/2026
U.S. ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 105 25-27	$1,105,573.00	9/30/2026
U.S. ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 103 25-27	$273,228.00	3/31/2027
HISTORICAL COMMISSION			
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	FY2022 EDI Community Project Funding Grant: B-22-C	$796,812.00	8/31/2030
U.S. DEPARTMENT OF INTERIOR	Club Baron National Register Nomination and Donelson		9/30/2025
U.S. DEPARTMENT OF INTERIOR	Davidson County Cemetery Preservation Plan (Phase I		9/30/2025
U.S. DEPARTMENT OF INTERIOR	Nashville Mid-20th Century African American Districts H		9/30/2025
U.S. DEPARTMENT OF INTERIOR	Dendrochronology 26-27	$3,750.00	3/30/2027
INFORMATION TECHNOLOGY SERVICES			
U.S. DEPARTMENT OF HOMELAND SECURITY	State and Local Cybersecurity Grant Program (SLCGP)	$0.00	8/31/2026
JUVENILE COURT			
BUREAU OF JUSTICE ASSISTANCE	Byrne State Crisis Intervention Program 25-27	$450,000.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Child Support Enforcement Title IV-D 23	$4,254,608.04	6/30/2026
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE	Child Support Enforcement Title IV-D27	$1,170,526.00	6/30/2027
METRO ACTION			
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Service Block Grant (CSBG)22-24		9/30/2024
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income Home Energy Assistance Program (LIHEA		9/30/2024
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Service Block Grant (CSBG) 24-25	$1,289,840.74	9/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income Home Energy Assistance Program (LIHEA	$5,960,415.51	9/30/2026

GRANTOR	TITLE	AWARD	GRANT END DATE
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE	Child and Adult Care Food Program 25-26	$1,236,986.07	9/30/2026
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Eviction Program (ERA	$1,403,317.50	7/31/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistane Eviction Program (ERA-E	$564,672.38	7/31/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Program (Part 2) 21-25	$9,218,157.84	9/30/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Program Part 2 21-25 Ad	$13,827,236.76	9/30/2025
NDOT			
GREATER NASHVILLE REGIONAL COUNCIL	Carbon Reduction Program 24-28	$3,512,179.00	12/31/2028
U.S. DEPARTMENT OF TRANSPORTATION	Federal COVID Relief Funds for Transportation Improve		9/30/2024
U.S. DEPARTMENT OF TRANSPORTATION	Strengthening Mobility and Revolutionizing Transportati	$2,000,000.00	8/15/2025
U.S. DEPARTMENT OF TRANSPORTATION	Advanced Transportation and Congestion Management	$1,500,000.00	6/30/2026
U.S. DEPARTMENT OF TRANSPORTATION	Congestion Mitigation Air Quality TDM (Phase 2) 23-25	$1,415,595.00	9/30/2026
U.S. DEPARTMENT OF TRANSPORTATION	Congestion Mitigation and Air Quality Improvement Pro	$3,655,000.00	7/1/2027
U.S. DEPARTMENT OF TRANSPORTATION	Congestion Mitigation and Air Quality Improvement -Tra	$3,053,780.00	12/31/2027
U.S. DEPARTMENT OF TRANSPORTATION	Stage 2 Strengthening Mobility and Revolutionizing Tra	$10,000,000.00	7/31/2028
U.S. DEPARTMENT OF TRANSPORTATION	FY23 Transportation Alternatives Program 23-28	$1,000,000.00	10/1/2028
U.S. DEPARTMENT OF TRANSPORTATION	Safe Streets and Roads for All 24-29	$13,049,572.00	12/30/2028
OFFICE OF EMERG. MGMT.			
U.S. DEPARTMENT OF HOMELAND SECURITY	EMERGENCY MANAGEMENT PERFORMANCE GRA	$180,049.50	9/30/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	PUBLIC ASSISTANCE GRANT FEMA-4637-DR-TN 21-	$810,927.90	12/9/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	2023 Homeland Security 23-26	$288,441.00	4/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	FY23 Urban Area Security Initiative 23-26	$740,450.00	4/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	2025 Homeland Security 25-28 (Letter of Acceptance)	$92,820.00	9/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	Emergency Management Performance Grant (EMPG) F	$180,049.50	9/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	PUBLIC ASSISTANCE FEMA-4691- DR-TN 22-26	$1,457,291.94	12/21/2026

GRANTOR	TITLE	AWARD	GRANT END DATE
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Homeland Security 24-27	$43,470.99	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Homeland Security 24-27 (Letter of Acceptance)	$43,470.99	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Urban Area Security Initiative 24-27	$591,642.71	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Urban Area Security Initiative 24-27	$591,642.71	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	FY24 Port Security Grant Program (PSGP) 25-28	$300,000.00	8/31/2027
U.S. DEPARTMENT OF TRANSPORTATION	Hazardous Materials Emergency Preparedness 22-25	$150,160.00	8/31/2025
U.S. DEPT. OF HOMELAND SECURITY	2025 URBAN AREA SECURITY INIATIVE 25-26 Letter	$1,425,776.00	9/30/2026
OFFICE OF FAMILY SAFETY			
U.S. DEPARTMENT OF JUSTICE	FY25 Office of Family Safety STOP , Family Justice Ce	$155,114.00	6/30/2026
U.S. DEPARTMENT OF JUSTICE	OCJP FY'26 Family Justice Center Initiative 26	$250,000.00	6/30/2027
U.S. DEPARTMENT OF JUSTICE	Office of Family Safety VOCA Grant 27	$309,500.00	6/30/2027
U.S. DEPARTMENT OF JUSTICE OVW	Office of Family Safety Fatality Review Technical Assist	$100,000.00	6/30/2027
OFFICE OF HOMELESS SERVICES			
U.S. DEPARTMENT OF EDUCATION	Supported Employment Expansion - Individualized Plac	$450,000.00	6/30/2028
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	MDHA Community Development Block Grant 24	$250,000.00	12/31/2024
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	Continuum of Care Transfer of Funds from MDHA 24-2	$381,251.00	6/30/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	HUD Coordinated Entry Renewal 24-25	$128,000.00	9/30/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	HUD HMIS Renewal 24-25	$141,508.00	10/31/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	Community Development Block Grant 23-27	$250,000.00	5/31/2027
POLICE DEPARTMENT			
FEDERAL OFFICE OF NATIONAL DRUG CONTROL POLI	2026 High Intensity Drug Trafficking Area (HIDTA) Gran	$133,000.00	12/31/2026
U S DEPARTMENT OF JUSTICE - BJA	2026 MNPD JAG Wellness Grant 26-27	$59,991.00	12/31/2026
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 22-25	$546,989.00	9/30/2025
U.S. DEPARTMENT OF JUSTICE	2024 VOCA - Law Enforcement Victim Coordinator 24	$1,423,365.00	6/30/2026

GRANTOR	TITLE	AWARD	GRANT END DATE
U.S. DEPARTMENT OF JUSTICE	2025 PSN Middle Grant 25	$175,294.00	6/30/2026
U.S. DEPARTMENT OF JUSTICE	2024 DNA Capacity Enhancement Backlog Reduction (	$243,744.00	9/30/2026
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 24-26	$594,876.00	9/30/2026
U.S. DEPARTMENT OF JUSTICE	2026 PSN Middle Grant 27	$156,401.00	6/30/2027
U.S. DEPARTMENT OF JUSTICE	2027 VOCA - Law Enforcement Victim Coordinator 27	$474,455.00	6/30/2027
U.S. DEPARTMENT OF JUSTICE	2025 DNA Capacity Enhancement Backlog Reduction (	$250,000.00	9/30/2027
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 25-27	$494,241.00	9/30/2027
U.S. DEPARTMENT OF TRANSPORTATION	2025 Tennessee Highway Safety Office DUI 24-25	$710,000.00	9/30/2025
U.S. DEPARTMENT OF TRANSPORTATION-NHTSA	2026 Tennessee Highway Safety Office DUI 26	$575,999.99	9/30/2026
U.S. OFFICE OF NATIONAL DRUG CONTROL POLICY	2025 High Intensity Drug Trafficking Area (HIDTA) 25	$76,000.00	12/31/2025
PUBLIC LIBRARY			
INSTITUTE OF MUSEUM AND LIBRARY SERVICES	FY 26 Library Services 26	$430,500.00	6/30/2026
INSTITUTE OF MUSEUM AND LIBRARY SERVICES	National Leadership Grant 27	$179,841.25	3/30/2028
U.S. DEPARTMENT OF TREASURY	Digital Skills, Education, and Workforce Development G	$117,938.00	10/31/2026
SHERIFF			
U.S. DEPARTMENT OF JUSTICE	BJA COSSUP 24-26	$1,526,248.00	9/30/2026
SOCIAL SERVICES			
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	GNRC Nutrition & Transportation Services 26 Contract	$1,195,570.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	GNRC Nutrition & Transportation Services FY26 Contra	$112,500.00	6/30/2026
STATE TRIAL COURTS			
U.S. DEPARTMENT OF TRANSPORTATION	Tennessee Highway Safety Office Recovery Court Enha		9/30/2024
U.S. DEPARTMENT OF TRANSPORTATION	Tennessee Highway Safety Office Recovery Court Enha	$60,000.00	9/30/2025
U.S. DEPARTMENT OF TRANSPORTATION	Tennessee Highway Safety Office Recovery Court Enha	$60,000.00	9/30/2026
WASTE SERVICES			

GRANTOR	TITLE	AWARD	GRANT END DATE
ENVIRONMENTAL PROTECTION AGENCY	Solid Waste Infrastructure for Recycling (SWIFR) 26-28	$2,440,000.00	6/30/2028
WATER & SEWER			
ENVIRONMENTAL PROTECTION AGENCY	Metro Nashville Police Department Impound Lot Storm	$500,000.00	9/30/2025
ENVIRONMENTAL PROTECTION AGENCY	Lead Service Line Inventory 24-26		12/31/2025
U.S. DEPARTMENT OF AGRICULTURE FOREST SERVIC	Tree Canopy Restoration for Natural Resources Enhanc	$539,000.00	9/30/2026
U.S. DEPARTMENT OF TREASURY	DWR-ARP Non Collaborative State Water Infrastructure	$63,418,244.83	9/30/2026

Fiscal Year 2025 Disadvantaged Business Report
FY26 (July 1, 2025 - June 30, 2026)

		Disadvantaged Business														Totals		
		Ethnic Minority Male Only						Woman Owned										
		African American	Asian American	Hispanic American	Native American	Non-Specific Male Minority	Total Minority Owned	African American	Asian American	Hispanic American	Native American	Non-Specific Female Minority	White American Female	Total Woman Owned	OS&E*	Total Disadvantaged Business Enterprises	White American Male	Total of All Business
1	Agricultural Extension	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
2	Arts Commission	88,573	25,750	0	0	0	**$1,047,062**	874,947	0	17,586	40,206	0	80,727	**$80,727**	0	**$1,127,789**	0	**$1,127,789**
3	Assessor of Property	59,000	0	0	0	0	**$59,000**	0	0	0	0	0	285	**$285**	0	**$59,285**	0	**$59,285**
4	Beer Board	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
5	Board of Fair Commissioners	491,314	2,567	0	0	0	**$493,880**	0	0	0	0	0	471,143	**$471,143**	0	**$965,023**	0	**$965,023**
6	Circuit Court Clerk	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
7	Clerk and Master - Chancery	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
8	Codes Administration	0	0	0	0	0	**$0**	0	0	0	0	0	14,637	**$14,637**	0	**$14,637**	0	**$14,637**
9	Community Oversight Board	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
10	Community Review Board	0	0	0	0	0	**$0**	0	0	0	0	0	11,312	**$11,312**	0	**$11,312**	0	**$11,312**
11	Convention Center Authority	67,595	0	0	0	0	**$186,419**	118,824	0	0	0	0	4,020,808	**$4,020,808**	0	**$4,207,226**	0	**$4,207,226**
12	County Clerk	0	0	0	0	0	**$5,250**	5,250	0	0	0	0	28,722	**$28,722**	0	**$33,972**	0	**$33,972**
13	Criminal Court Clerk	0	0	0	0	0	**$0**	0	0	0	0	0	8,008	**$8,008**	0	**$8,008**	0	**$8,008**
14	Criminal Justice Planning	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
15	Debt Service	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
16	District Attorney	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
17	District Energy System	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
18	East Bank Development Authority	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
19	Election Commission	2,335	0	0	0	0	**$2,335**	0	0	0	0	0	171,140	**$171,140**	0	**$173,475**	0	**$173,475**
20	Emergency Communications	19,692	0	3,851	0	0	**$23,542**	0	0	0	0	0	153,186	**$153,186**	0	**$176,728**	0	**$176,728**

21	Employee Benefit Board	0	0	0	0	0	**$0**	0	0	0	0	0	18,820	**$18,820**	0	**$18,820**	0	**$18,820**
22	Farmer's Market	993,328	2,515	0	0	0	**$1,000,444**	4,600	0	0	0	0	197,435	**$197,435**	0	**$1,197,879**	0	**$1,197,879**
23	Finance	33,600	0	0	0	0	**$39,675**	6,075	0	0	0	0	196,944	**$196,944**	0	**$236,619**	0	**$236,619**
24	Fire	339,351	0	0	0	0	**$340,011**	0	0	660	0	0	1,048,366	**$1,048,366**	0	**$1,388,377**	0	**$1,388,377**
25	General Hospital	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
26	General Services	16,039,192	0	82,279	0	0	**$21,834,149**	3,578,801	598	2,133,280	0	0	22,001,874	**$22,001,874**	0	**$43,836,024**	0	**$43,836,024**
27	General Sessions Court	0	0	0	0	0	**$0**	0	0	0	0	0	35,652	**$35,652**	0	**$35,652**	0	**$35,652**
28	Health	2,333,037	344,019	0	0	0	**$2,886,411**	201,245	1,950	6,160	0	0	14,402,098	**$14,402,098**	0	**$17,288,509**	0	**$17,288,509**
29	Historical Commission	26,590	0	0	0	0	**$26,590**	0	0	0	0	0	90,893	**$90,893**	0	**$117,483**	0	**$117,483**
30	Human Relations Commission	1,500	0	0	0	0	**$14,428**	12,928	0	0	0	0	30,000	**$30,000**	0	**$44,428**	0	**$44,428**
31	Human Resources	0	0	0	0	0	**$0**	0	0	0	0	0	1,462	**$1,462**	0	**$1,462**	0	**$1,462**
32	Industrial Development Board	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
33	Information Technology Services	0	527,335	0	0	0	**$2,790,284**	3,392	2,259,557	0	0	0	865,318	**$865,318**	0	**$3,655,602**	0	**$3,655,602**
34	Internal Audit	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
35	Justice Integration Systems	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
36	Juvenile Court	158,468	0	0	0	0	**$158,468**	0	0	0	0	0	18,764	**$18,764**	0	**$177,231**	0	**$177,231**
37	Juvenile Court Clerk	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
38	Law	4,500	0	0	0	0	**$4,500**	0	0	0	0	0	3,210	**$3,210**	0	**$7,710**	0	**$7,710**
39	Mayor's Office	0	0	0	0	0	**$0**	0	0	0	0	0	126680.34	**$126,680**	0	**$126,680**	0	**$126,680**
40	Metro Action Commission	651,647	0	0	2,570	0	**$2,150,675**	61,250	1,603	1,433,605	0	0	1,730,589	**$1,730,589**	0	**$3,881,264**	0	**$3,881,264**
41	Metropolitan Clerk	0	0	0	0	0	**$0**	0	0	0	0	0	4,065	**$4,065**	0	**$4,065**	0	**$4,065**
42	Metropolitan Council	0	0	0	0	0	**$37,534**	0	37,534	0	0	0	1330.59	**$1,331**	0	**$38,865**	0	**$38,865**
43	Municipal Auditorium	296,993	0	0	0	0	**$300,518**	0	0	3,525	0	0	34,673	**$34,673**	0	**$335,191**	0	**$335,191**
44	Office of Emergency Management	0	0	0	0	0	**$0**	0	0	0	0	0	47,188	**$47,188**	0	**$47,188**	0	**$47,188**
45	Office of Family Safety	0	0	0	0	0	**$8,934**	825	8,109	0	0	0	9,276	**$9,276**	0	**$18,210**	0	**$18,210**

46	Office of Homeless Services	401635.54	0	0	0	0	**$581,092**	34,173	0	145,284	0	0	52,590	**$52,590**	0	**$633,681**	0	**$633,681**
47	Parks and Recreation	2,077,778	0	0	0	0	**$2,496,521**	229,763	0	186,879	2,100	0	13,177,724	**$13,177,724**	0	**$15,674,244**	0	**$15,674,244**
48	Planning Commission	0	0	0	0	0	**$182,700**	181,800	900	0	0	0	1,638	**$1,638**	0	**$184,338**	0	**$184,338**
49	Police	16,658		17,800	10,800	0	**$1,369,827**	47,637	1,229,454	47,478	0	0	4,822,961	**$4,822,961**	0	**$6,192,788**	0	**$6,192,788**
50	Public Defender	0	0	0	0	0	**$1,050**	1,050	0	0	0	0	792	**$792**	0	**$1,842**	0	**$1,842**
51	Public Library	1,199,576	11,088	7,130	0	0	**$34,686,025**	748,866	0	32,719,365	0	0	3,752,750	**$3,752,750**	0	**$38,438,775**	0	**$38,438,775**
52	Register of Deeds	0	0	0	0	0	**$0**	0	0	0	0	0	0	**$0**	0	**$0**	0	**$0**
53	Sheriff	516,788	0	0	0	0	**$581,068**	0	64,280	0	0	0	2,592,546	**$2,592,546**	0	**$3,173,615**	0	**$3,173,615**
54	Social Services	0	0	0	0	0	**$0**	0	0	0	0	0	19,725	**$19,725**	0	**$19,725**	0	**$19,725**
55	Sports Authority	0	0	0	0	0	**$1,000**	1,000	0	0	0	0	0	**$0**	0	**$1,000**	0	**$1,000**
56	State Trial Courts	0	0	0	0	0	**$8,442**	8,442	0	0	0	0	36	**$36**	0	**$8,478**	0	**$8,478**
57	Transportation (NDOT)	1,292,217	1,224,352	58,004	0	0	**$7,440,110**	3,073,739	0	0	1,791,798	0	7,509,114	**$7,509,114**	0	**$14,949,224**	0	**$14,949,224**
58	Trustee	7,500	0	0	0	0	**$7,500**	0	0	0	0	0	351,347	**$351,347**	0	**$358,847**	0	**$358,847**
59	Waste Services	1,502,036	1,394	0	0	0	**$2,184,082**	600	0	680,052	0	0	6,813,708	**$6,813,708**	0	**$8,997,791**	0	**$8,997,791**
60	Water Services	5,413,512	0	0	0	0	**$8,731,133**	645,884	511,947	2,159,790	0	0	14,289,934	**$14,289,934**	0	**$23,021,067**	0	**$23,021,067**
	Totals	$34,034,414	$2,139,021	$169,063	$13,370	$0	**$91,680,659**	$9,841,090	$4,115,932	$39,533,664	$1,834,104	$0	$99,209,471	**$99,209,471**	$0	**$190,890,130**	$0	**$190,890,130**

**OS&E (Other Socially and Economically disadvantaged Business) includes disabled and veteran owned businesses.