2024 - 2025

LANGUAGE ACCESS PLAN

Memphis and Shelby County
Homeless Consortium

Approved June 2024

Community Alliance
FOR THE HOMELESS

The development of this Language Access Plan was a collaborative effort. Community Alliance for the Homeless would like to thank all those who provided their time, expertise, and input in helping inform the contents of this plan.

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The final Language Access Plan was drafted by the Continuum of Care team at Community Alliance for the Homeless. For any questions regarding this Language Access Plan, protocols outlined in the plan, and provision of language access services, please contact languageaccess@cafth.org.

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I.   Language Access Plan Introduction

Language and accessibility barriers can be challenges to navigating and receiving housing and homelessness services for limited English proficient (LEP) individuals and individuals who have a communication disability, including deaf/hard of hearing and visually impaired individuals. The Memphis and Shelby County Homeless Consortium (MSCHC) Language Access Plan serves to ensure meaningful access to all services provided by TN-501 Continuum of Care (CoC) member agencies regardless of the client's preferred language and communication abilities. This plan also serves to make CoC agencies aware of the federal obligation to ensure meaningful access to services for LEP individuals and individuals who have a communication disability, and provide guidance in the provision of language access services.

Vision Statement

The Memphis and Shelby County Homeless Consortium will provide meaningful access to timely and quality language access services for non- English speaking individuals and individuals who have a communication disability, including individuals who are deaf/hard of hearing, individuals who have a visual impairment, and individuals with other communication disabilities or needs in all of its programs, activities, and services consistent with Department of Housing and Urban Development (HUD) published final guidance, Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act of 1973.

Federal Obligation to Ensure Meaningful Access

Title VI of the Civil Rights Act of 1964
Title VI of the Civil Rights Act of 1964 prohibits a recipient of federal funding from discriminating against individuals on the basis of national origin, which extends to the individual's preferred language. Executive Order 13166 signed in 2000, required all federal agencies to draft guidance to recipients of federal funding outlining obligations to ensure meaningful access to limited English proficient individuals. In response to Executive Order 13166, in 2007 HUD published final guidance, Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, to guide recipients of HUD financial assistance in meeting the responsibilities outlined in Title VI and ensure all individuals have meaningful access to HUD funded programs and activities. HUD's guidance seeks to clarify federal assistance recipients obligations to non-English speaking

individuals, provide guidance on the development of a language access plan, and outline best practices for provision of language access services.

Americans with Disabilities Act (ADA)

Title III of the [Americans with Disabilities Act (ADA)](#) Effective Communication Requirements requires that title III entities, including public accommodations such as non-profit service organizations, communicate effectively with and provide needed language access services to individuals who have communication disabilities, including individuals who are deaf/hard of hearing and/or have a visual impairment.

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 requires that no qualified individual with a disability shall be excluded from, denied the benefits of, or be subjected to discrimination under any program activity that receives federal financial assistance. Section 504 of the Rehabilitation Act of 1973 includes effective communication with individuals who are Deaf/hard of hearing.

As a recipient of federal financial assistance in the form of CoC and YHDP program funding from HUD, the MSCHC has a responsibility to ensure that all services provided by TN-501 Continuum of Care member agencies are accessible to all individuals regardless of preferred language and communication abilities.

Scope

The policies and protocols outlined in this Language Access Plan apply to everyone who operates under the umbrella of the TN-501 CoC, including the CoC and Homeless Management Information System (HMIS) Lead Agency, the Memphis and Shelby County Homeless Consortium Governing Council, and agencies that receive CoC and YHDP funding for program operation.

II.   Overview of Language Access Planning and Language Access Services

The development of a language access plan helps agencies and employees understand their role and responsibilities with respect to overcoming language barriers and providing appropriate services for non-English speaking individuals and individuals who have a communication disability.

What are Language Access Services?

Language access services comprise those services necessary for meaningful and effective communication. Meaningful and effective communication happens when an individual can accurately and meaningfully communicate with, receive information from, and convey information to another person.

Oral and Written Language Access Services

Language access services include both oral and written language services. This can include:
- **Interpretation** - the translation of spoken word from one language to another provided by a trained interpreter or bilingual/multilingual staff person
- **Translation** - the translation of written word from one language to another provided by a trained translator or bilingual/multilingual staff person

Auxiliary Aids and Services

Language access services for those with communication disabilities include the use of auxiliary aids and other services. These may include:
- The use of a qualified reader, someone who can effectively, accurately, and impartially read information to someone who has a visual impairment
- Providing information in large print, or electronically for use with a computer screen-reading program
- Providing an audio recording of printed information to someone who has a visual impairment
- The use of a qualified notetaker, someone who can effectively, accurately, and impartially write notes for someone who is deaf/hard of hearing
- Use of a qualified sign language interpreter
- Provision of written materials and printed scripts for someone who is deaf/hard of hearing
- Provision of real-time captioning, creation of captions that appear on a screen at the same time content is being played or words are spoken

III.   CAFTH Language Access Webpage

To aid in the implementation of this Language Access Plan, a Language Access webpage has been added to the Community Alliance for the Homeless website. On this webpage, all agencies will have access to information on all federal regulations pertaining to language access;

language access training recordings; translated materials such as select HMIS, CES and other vital documents; and resources such as "I speak" cards, Title VI notices, and Quick Reference Guides to aid in the implementation of this plan. This webpage can be visited at this [link](#).

IV.   Plan Development and Implementation

As the lead agency of the Memphis and Shelby County Homeless Consortium, Community Alliance for the Homeless (CAFTH) has prepared this Language Access Plan (LAP) to provide guidance to all consortium member agencies on provision of language access services and to develop a coordinated approach to ensure equitable and meaningful access to services for all those experiencing homelessness within our community.

This Language Access Plan was developed by Community Alliance for the Homeless and informed by CoC member agency staff and community stakeholders. The plan was developed using best practice guidance as outlined in the Department of Housing and Urban Development [Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons](#). As part of development of the LAP, three workgroup sessions were held with CoC member agency staff to develop and receive feedback on protocols pertaining to each component of the LAP. An additional workgroup session was held with Spanish speaking clients and bilingual client advocates to receive community input from clients themselves on draft protocols. Feedback from these workgroups was incorporated into the final plan.

Implementation of this plan will include its dissemination and adoption of its protocols by the CoC and HMIS lead agency and all consortium member agencies receiving CoC and/or YHDP funding for program operation. Additionally, upon adoption of the Language Access Plan, all agency staff and employees will receive training provided by the CoC and HMIS lead agency, Community Alliance for the Homeless, on Title VI, this Language Access Plan, best practices, and tools for implementation. It is expected that upon hire of any new CoC member agency staff or employees, that they will receive language access plan training.

The Language Access Plan will be evaluated annually for effectiveness, along with the completion of an annual assessment of demographics, languages spoken, and data on limited English proficiency within the CoC service area of Shelby County to ensure relevance of plan protocols.

V.   Managing Cultural Differences

Language is intertwined with culture. When interacting with someone who speaks a different language, it means you are also interacting with the culture that speaks that language. As agencies interact with non-English speakers and individuals with communication disabilities, it is important to keep in mind how cultural differences may impact those interactions. In addition, it will be important for staff to implement practices that create spaces that are welcoming to non-English speaking individuals.

Provision of language services can help overcome language and cultural barriers. When working with clients who speak a non-English language, are limited English proficient and/or have a communication disability keep in mind:

Cultural Sensitivity: A client's culture, traditions, and experiences may be very different from your own. Understand that differences exist. Be non-judgemental.
Indirect Communication: English is a direct language. In other languages and cultures, it may take longer to get to the point or reach a conclusion - even during emergency situations. Understand this issue and be patient.
Education: non-English speakers or individuals with a communication disability may not be familiar with practices common to us or with CoC programs and operations. To improve communication and reduce confusion, offer explanations when possible to bring the client into the mainstream.
Simple Language: To improve understanding, use simple language and ask for clarification when needed. Speak in a neutral tone.

Use of short phrases

The use of greetings and short phrases in the preferred language of a non-English speaking client can go a long way in creating a welcoming space for a non-English speaking client. It is encouraged that staff become familiar with and use greetings and short phrases such as, "I am contacting an interpreter," in frequently encountered languages. Short phrase Quick Guide References are available on the CAFTH [Language Access Webpage.](#)

VI.   Language Access Plan Components & Protocols

This Language Access Plan is divided into nine components that are essential to the success of a language access plan, as outlined in the HUD final guidance. The protocols outlined in each

component are expected to be implemented among the CoC and HMIS lead agency and all CoC member agencies receiving CoC and/or YHDP funding to ensure meaningful communication with and access to services for non-English speaking individuals and individuals who have a communication disability.

Component 1: Assessment of community needs
Component 2: Identification of client language and communication needs
Component 3: Documentation of client language and communication needs
Component 4: Providing notices of availability of language access services & other signage
Component 5: Delivery of services
Component 6: Quality of services and competency of interpreters and translators
Component 7: Staff training
Component 8: Monitoring and evaluation of the Language Access Plan
Component 9: Language access complaints and grievance policy

COMPONENT 1: Assessment of community needs

HUD guidance outlines that an assessment of a community's language access needs is an essential first step in developing a language access plan and implementing language access services. HUD outlines using a four factor analysis approach to assess community language access needs. Community Alliance for the Homeless conducted a four factor analysis, as outlined below, to inform the development of this Language Access Plan.

Community Alliance for the Homeless conducted Community Needs Assessment

Assessment of the number of and preferred languages of LEP individuals, and number of individuals with a communication disability, including deaf/hard of hearing and visually impaired individuals within the CoC's service area is necessary to determine the extent of language access needs. Unfortunately, little data on preferred language and language access service needs is currently available among CoC member agencies. Data from the American Community Survey (ACS)[1] was used to understand the number of and preferred languages of LEP individuals within Shelby County and to conduct a Four Factor Analysis. It is the hope that with implementation of the identification and documentation protocols outlined in this plan, the CoC will have updated data on the language access service needs of its service population.

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[1] American Community Survey. The American Community Survey is conducted by the US Census Bureau and collects demographic, economic, and housing data every year. The ACS is conducted in all U.S. states, American Indian and Alaska Native areas, and Hawaiian home lands.

Four Factor Analysis

A Four Factor Analysis, as outlined by HUD, is to be used to determine the extent of a federally funded recipient's obligation to provide language access services. It is a tool to help recipients determine the extent to which LEP individuals come into contact with its programs. This tool also gives direction on how the organization can provide meaningful and effective language access services depending on the need for these services within their service population. After completing the four factor analysis, Community Alliance for the Homeless (CAFTH) can conclude what kinds of language access services are most relevant and needed to ensure access to specific programs, activities, and services provided by the CoC. A four factor analysis balances the following four factors:

Factor 1

The number or proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered in the Eligible Service Population.

Factor 2

The frequency with which individuals with limited English proficiency come into contact with the program/organization.

Factor 3

The nature and importance of the program, activity or service provided by the organization to its beneficiaries.

Factor 4

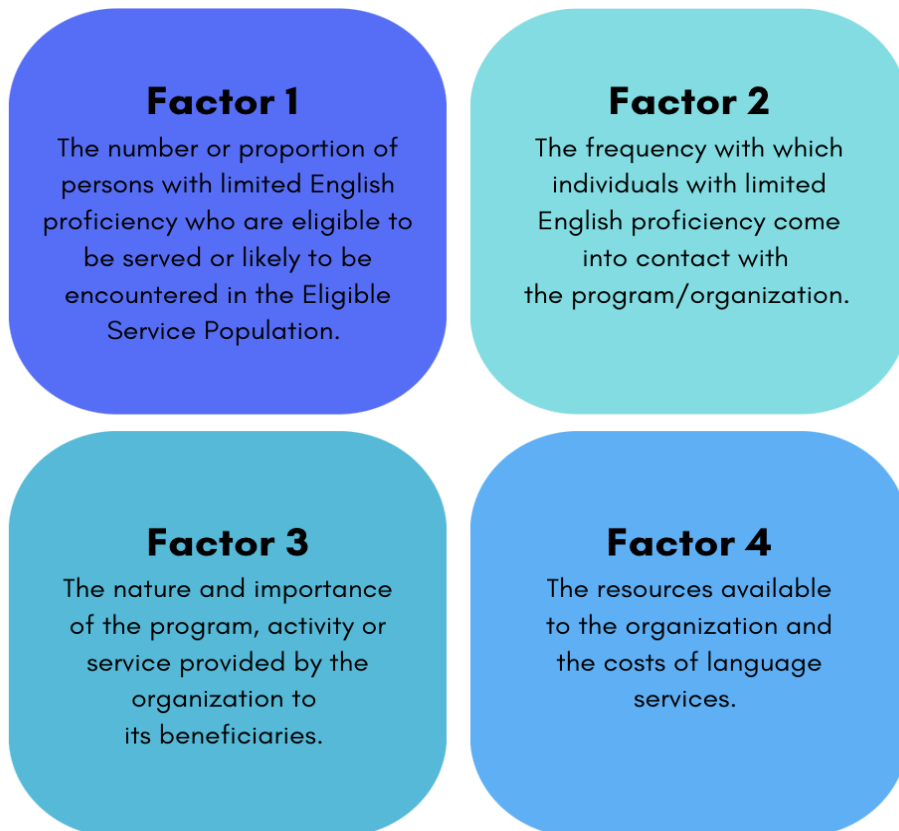The resources available to the organization and the costs of language services.

Figure 1. Four Factors of the Four Factor Analysis

Factor 1: The number or proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered in the Eligible Service Population.

The Memphis and Shelby County Homeless Consortium serves individuals experiencing, or at risk of experiencing homelessness who are currently located within Shelby County, TN. 2022 data from the American Community Survey (ACS) reported that 84,671 individuals five years of age and over within Shelby County speak a language other than English at home. Of those that speak a language other than English at home, data reports that 31,204 individuals, or 36.9%, speak English less than "very well" or are LEP[2]. Of those who speak English less than "very well," 43.5% are Spanish speaking.

The following table further breaks down the most commonly spoken languages in Shelby County by number and percentage of speakers who speak a language other than English and who are LEP[3].

Language Spoken	Number of Individuals who speak language in Shelby County	Percentage of population in Shelby County	Number of speakers who speak English less than "very well"	Percentage of speakers who speak English less than "very well"
Spanish	46,363	5.3%*	21,359*	46.1%
Vietnamese	4,150	0.47%	2420*	58.3%
Chinese (including Mandarin, Cantonese)	3,374	0.3%	1617*	47.9%
African Languages	4,577	0.5%	1,693*	36.9%
Arabic	3,587	0.41%	1,094*	30.4%
Korean	1,695	0.19%	858	50.6%
Tagalog	1,588	0.18%	450	28.3%
Hindi	1,308	0.15%	165	12.6%
Urdu	808	0.09%	140	17.3%

*Meet HUD safe Harbor Thresholds for written translation requirements

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[2] ACS 2022 1-year Estimates S1601 Language Spoken at Home.
[3] ACS 2015 5-year Estimates b16001 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.

HUD Safe Harbors

HUD has established "safe harbors" for translation of written materials. These safe harbors are intended to guide recipients in consideration of whether the number or proportion of LEP persons within the service area warrants written translations of vital documents into the frequently encountered languages spoken in the service area. Currently, the number of individuals within the Spanish, Vietnamese, Chinese, Arabic, and African languages speaking populations meet HUD safe harbor thresholds. This means that vital documents, those documents required for an individual to fully access services and understand their rights, should be made readily available and translated into those languages.

The table below sets forth "safe harbors" for written translations.

Size of language group	Recommended provision of written language assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents.
More than 5% of the eligible population or beneficiaries *and* more than 50 in number	Translated vital documents.
More than 5% of the eligible population or beneficiaries *and* 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries *and* less than 1,000 in number	No written translation is required.

Figure 2. HUD Safe Harbor Definitions

Factor 2: Frequency with which limited English proficient individuals come into contact with the program/services

In fall 2023, Community Alliance for the Homeless administered a community survey to all CoC agencies which collected data on client demographics, English proficiency and language access needs of clients, and current language access practices in place at CoC agencies. The response rate of this survey was low, with 16 of 50 CoC member agencies completing the survey. However, of those agencies for which data was collected, there were small numbers reported for interactions with LEP, deaf/hard of hearing, and visually impaired clients, with the majority of agencies reporting not knowing the number of LEP individuals who attempt to access

services or who are served by their agency. Of the agencies who did record an estimated number of LEP clients encountered or served, several agencies reported seeing 1-10 LEP clients per month, with a few larger organizations and healthcare systems seeing more than 30 LEP clients per month.

Prior to October 2023, language data was not collected in the dedicated Homeless Management Information System (HMIS) for the consortium. Therefore, no data on languages spoken, preferred language, English proficiency, or language access needs were documented for individuals for whom there was contact with a CoC provider and the creation of a HMIS profile. As of October 2023, an additional question asking about a client's translation assistance needs was added as an intake question for client program enrollment in HMIS. As the CoC continues to collect data on translation assistance needs, and with the implementation of this Language Access Plan, it is the hope that the CoC will have more accurate data on languages spoken and English proficiency among clients served.

Data on the frequency and types of interactions with LEP, deaf/hard of hearing, and visually impaired clients among CoC member agencies is incomplete, most likely due to:
- Lack of standardized documentation and community tracking of languages spoken, preferred language, and language access needs of clients
- Small LEP client population due to:
  - Lack of staff knowledge on providing appropriate language access services
  - Lack of available language access services, such as interpreters and translators at CoC agencies
- Lack of outreach to non-English speaking communities and individuals experiencing homelessness

Factor 3: The nature and importance of the program, activity, or service provided by the organization

The MSCHC operates several crucial housing programs to meet the needs of those experiencing homelessness within Memphis and Shelby County. CoC member agencies make up a broad range of service providers, including housing, emergency shelter, case management, healthcare, counseling, emergency services, support services, outreach, etc. These programs and services often require the creation of a client profile within HMIS and the collection and documentation of a client's personal information, such as housing history, health, income, and educational background. The collection of accurate information and the ability to accurately describe the nature of the services and procedures for accessing those services is essential. Given that many of these services, especially in emergency situations, are necessary to protect the life and safety

of a client, services that the CoC provides are incredibly important to achieving the goals of the Continuum in ending homelessness.

Factor 4: The resources available to the recipient and costs

There are several CoC member agencies who have established contracts with language service providers, and who also have bilingual/multilingual staff on site. In addition, there are a few local organizations providing language services, such as DeafConnect of the Mid-South, with whom the lead agency Community Alliance for the Homeless, is working to establish partnerships. Lastly, there exists federally provided guidance, resources, and materials, such as "I speak" cards and translated notices of available language access services, that can be tailored to fit the language access needs of our community. However, given these resources, many CoC member agencies operate with small staff and funding capacities. Therefore, the CoC and its lead agency intends to minimize the costs of sustaining language access services by providing the necessary resources to CoC member agencies in order to successfully implement this plan.

We understand that in order to provide accurate and timely language access services, costs will be incurred for:
- Workgroup sessions with LEP clients and community providers for development and review of the Language Access Plan
- Establishing and maintaining a contract with a language service provider
- Translation of HMIS and CES vital documents
- Annual CoC training on Title VI, language access, and implementation of this Language Access Plan
- Monitoring and evaluation of this Language Access Plan

Shelby County Frequently Encountered Languages List

As determined by the Four Factor Analysis and through community discussion and data collection, the following languages are considered frequently encountered languages within Memphis and Shelby County and also meet HUD's safe harbor threshold for written translation requirements. Interpretation services should be accessible for all of the listed languages. Additionally, all notices of availability of language access services, "I speak" cards, vital documents, and other materials as outlined in this Languages Access Plan should be translated and made available in the following languages:
- Spanish
- Vietnamese
- Chinese including both Mandarin and Cantonese

- Arabic
- African languages *At this time, Community Alliance for the Homeless does not have data that breaks down the most frequently encountered African languages within our community. It is recognized that African languages are commonly spoken in Memphis and Shelby County. As we collect additional information, we intend to update this guide with exact language names.*
- Urdu
- American Sign Language *ASL is not a written language and therefore, documents are not translated into ASL. However, ASL must be a language option on all "I speak" cards and Title VI notices. ASL interpretation must be provided upon request.*

*At time of implementation of this Language Access Plan for the 2024 - 2025 MSCHC year, all "I speak" cards and notices of free language access services will be available in these frequently encountered languages. However, at this time, we do not have the capacity to translate all vital documents and agency materials into all these languages. We are meeting these expectations by providing interpretation services for these languages, and translating select HMIS and CES forms into Spanish. Our goal is to have all vital documents translated into these frequently encountered languages for the 2025 - 2026 MSCHC year.

COMPONENT 2: Identification of client language and communication needs

It is the responsibility of all CoC member agencies to promptly identify the preferred language and communication needs of each client accessing services at their agency to the best of their ability. It is expected that all CoC member agencies will identify:

- Preferred language of the client. The preferred language of the client is the language a client feels most comfortable communicating in both orally and written
- Any communication disabilities the client may have, including any hearing or visual impairments
- Need for interpretation and translation assistance or other language access needs of the client

There should be no assumptions made about an individual's preferred language and/or communication abilities based on race, color, national origin or because they appear to have a communication disability.

Protocol for identification of client language and communication needs

The below protocol should be followed for each *initial* interaction with a client to ensure the client's preferred language, any communication disabilities, and language access needs are identified.

Step 1: Assess for language barriers. Determine if the person is limited English proficient (LEP), deaf/hard of hearing, or has a visual impairment and/or other communication disability.
A person may be identified as LEP, deaf/hard of hearing, or having a visual impairment in the following ways:
  a) The person self-identifies or is identified by a companion or family member
  b) The person requests an interpreter and/or other language access services
  c) Available documentation indicates the individual's preferred language, presence of a communication disability, and/or language access service needs (i.e. existing HMIS profile, intake paperwork, etc.)
  d) LEP status and/or the presence of a communication disability are verified by an interpreter or by bilingual/multilingual staff.
  e) The person appears not to understand, comprehend, or speak English (i.e. the individual appears confused, does not respond to questions, relies on body language, there's a lag in the conversation, etc.), is speaking in another language, or appears to have or indicates presence of a hearing or visual impairment

Step 2: Determine the preferred language of the LEP person
There are multiple ways to determine the preferred language of a client, including but not limited to:
  1) The person self-identifies their preferred language
  2) The person has a companion with them who can identify the language
  3) There is available documentation for the person that identifies the preferred language
  4) Use of "I speak" cards
      a) If the preferred language of the client cannot be identified by 1, 2, or 3, it is best practice to use "I speak" cards to identify the person's preferred language. ***See Use of "I speak" cards.***
  5) Interpreter and/or bilingual/multilingual staff identifies the preferred language.
      a) If the preferred language of the client cannot be determined through the use of "I speak" cards, contact an interpreter or trained bilingual/multilingual staff to identify the client's preferred language. See ***Protocol for obtaining an interpreter.***

Step 3: Identify client's language access service needs

Identify if there is a need for translation/interpretation services, sign language interpretation, communication devices such as assistive listening devices and/or other language services. This should be done by:

1) Pointing to the "I speak" cards corresponding to the client's preferred language and asking if they need an interpreter and/or other language access services
2) Contacting an interpreter or trained bilingual/multilingual staff to confirm client's language access needs. See ***Protocol for obtaining an interpreter***.

Using short phrases: It is important during an initial interaction with a non-English speaking client to create a welcoming space. This can be done by using short phrases in the preferred language of the client such as a greeting, or saying "I am contacting an interpreter." It is encouraged that all staff become familiar with and use these short phrases, to the best of their ability, when interacting with non-English speaking individuals. For a Short Phrases Quick Reference Guide, visit the CAFTH Language Access Webpage.

Protocol for telephone client-staff contact:

When interacting with an LEP individual over the phone, staff should use "I speak" cards to identify the language of the individual by listing the names of the languages or countries of origin if the preferred language is not already known.

The conversation may go as follows:
Staff: "Spanish, interpreter? Vietnamese, interpreter? Ok. Hold please, we will connect you with an interpreter."

After identifying the preferred language of the client, or if the language of the client cannot be determined, contact an interpreter. ***See Protocol for obtaining an interpreter.***

If your agency has a language telephone menu, we encourage continued use of your agency's telephone communication protocol to identify the preferred language of the client and continue protocols for obtaining appropriate language access services.

If language preferences and/or language access service needs cannot be identified

If it is identified that there is a language barrier, and/or client cannot read or write in their preferred language, or the preferred language cannot be identified using an "I speak" card,

contact an interpreter or trained bilingual/multilingual staff person. When contacting an interpreter, explain that you are working with a client and are unsure of the client's preferred language. ***See*** ***[Protocol for obtaining an interpreter.](#)***

Use of "I speak" Cards

"I speak" cards present short phrases in several different languages and can be presented to clients for identification of their preferred language. Clients are also encouraged to carry their own "I speak" card to present to staff when accessing services.

If there is a language barrier and the preferred language of the client is unknown:
1. Present each "I speak" card to the client one by one until they identify their preferred language
2. Once the language is identified, follow the protocols for contacting an interpreter or on-site trained bilingual/multilingual staff member to interpret in the client's preferred language. ***See*** ***[Protocol for obtaining an interpreter.](#)***

The expectation of agency use of "I speak cards"

All agencies must have sets of "I speak" cards available at agency locations that receive clients.

Agencies must provide each staff member who has regular and significant encounters with clients, including outreach staff, case managers, staff whose role is to welcome and conduct client intakes, access to a set of "I speak" cards. It is expected that these trained staff will have "I speak" cards easily accessible or carried on personnel at all times or during work tasks and activities that may involve client contact. All staff, upon hire and as part of language access plan training, should be trained on the use of "I speak" cards.

In addition, "I speak" cards should be made available in agency spaces, including at front desks, in waiting areas, and in intake offices. Printed "I speak" cards should be available for clients to take and carry on them to present to staff members.

MSCHC available "I speak" cards

The MSCHC has sets of staff and client "I speak" cards that are available for use by all CoC member agencies. CoC member agencies are encouraged to use these cards. These cards can be found on the CAFTH [Language Access Webpage](#). If an individual agency is already using or

chooses to use their own "I speak" cards, any "I speak" cards used by an agency must fulfill the following requirements:

All "I speak" cards must include:
1. A short phrase (most "I speak" cards translate the following phrase: I speak <u>the name of language</u>) within the non-English language
2. English translation of language name for identification by staff
3. Notice to the non-English speaker in the non-English language that under Title VI of the Civil Rights Act, they are entitled to language access services free of charge.
   a. Example: Under Title VI of the Civil Rights Act and the Americans with Disabilities Act, non-English speaking persons and persons who have a communication disability have a right to free language access services, including interpretation and translation in their preferred language. This "I speak" card will help service providers identify your preferred language before contacting an interpreter for assistance.
4. An "I speak" card for American Sign Language (ASL)

COMPONENT 3: Documentation of client language and communication needs

The preferred language, presence of a communication disability, and language access service needs of each client should be documented to ensure that the client receives timely and quality services. Additionally, this information will be used to annually evaluate the effectiveness of provided language access services and unmet language access needs within our community.

It is expected that all CoC member agencies utilizing HMIS will record the following within HMIS when enrolling a client into any program:
- Client's preferred language (language that the client primarily speaks, reads, or writes in and/or feels most comfortable communicating in)
- Presence of any communication preferences and/or disabilities, such as if the client is deaf/hard of hearing and/or has a visual impairment
- Any language access service needs (i.e. need for an interpreter, translation of documents, auxiliary aids and services, etc.)

The following three fields are required to be completed on the program enrollment page within HMIS:
1. Client Preferred Language Field
2. Interpretation and Translation Assistance Field

3. Communication Assistance Needs Field

Protocol for documentation of client language and communication needs in HMIS

Step 1: Complete the client preferred language field on HMIS program enrollment page
> Record Client's Preferred Language (this is the language they feel most comfortable communicating in or prefer to communicate in). For identifying a client's preferred language see ***Protocol for identification of client language and communication needs*** and ***use of "I speak" cards.***

Step 2: Complete the interpretation and translation assistance needs field on HMIS program enrollment page
> Record the client's need for interpretation and translation assistance. If the client indicates a preferred language other than English in the preferred language field above, confirm if they need interpretation or translation assistance within that language.

Step 3: Complete the communication assistance needs field on HMIS program enrollment page
> Record any communication assistance needs, accommodations, or communication disabilities of the client.

If the client reports no interpretation and translation assistance needs AND no communication assistance needs, no further action is required

If the client reports interpretation and translation assistance needs AND/OR communication assistance needs, continue to the ***Client Language Access Needs Assessment*** within HMIS

Client Language Access Needs Assessment

The Client Language Access Needs Assessment *must* be completed for any client who reports interpretation and translation assistance needs and/or communication assistance needs in the language access fields on the HMIS program enrollment page. This assessment is available under the assessments tab in HMIS. This assessment will collect additional information on the language access needs of the client so staff can provide appropriate language services. See Appendix C and the CAFTH Language Access Webpage for a copy of the assessment.

Protocol for administering the Client Language Access Needs Assessment

Step 1: If needed, contact an interpreter (i.e. for a non-English speaking client or a client who is deaf/hard of hearing). Follow the ***Protocol for obtaining an interpreter***.
    a. An interpreter should be contacted if there is any language barrier between client or staff, or an inability of the client to fully communicate with or understand staff.

Step 2: Complete the Client Language Access Needs Assessment. **If using an interpreter,** follow the ***Protocol for completing documents when using an interpreter***.

Step 3: Input answers to the assessment in HMIS.
    a. Complete the Client Language Access Needs Assessment in HMIS under the client's profile > Assessments

Step 4: Follow the ***After completing the Client Language Access Needs Assessment directions***

After completing the Client Language Access Needs Assessment directions

The questions on the Client Language Access Needs Assessment are intended to collect additional information about a client's language access needs so staff are able to obtain the appropriate services. After completion of the assessment with a client, please follow the below instructions, referencing the MSCHC Language Access Plan to ensure the client is provided appropriate language access services.

1. **Questions 3-4.** These questions are designed to ensure that the client is given both spoken and written information in a language they understand. Please ensure to obtain an interpreter for a client who prefers to receive spoken information in a non-English language (question 3). When completing documents with the client, provide the client with translated documents in the language they prefer to receive written information in (question 4), when available. All HMIS and CES translated documents can be found on the CAFTH Language Access Webpage. See Language Access Plan ***Component 5: Delivery of Services***.

2. **Question 5.** If a client reports needing accommodations for a hearing impairment, obtain or provide the indicated accommodations. For a list of accommodations, see Language Access Plan Sections ***Auxiliary aids and services*** and ***Delivery of auxiliary aids and services***. For obtaining a sign language interpreter follow the Language Access Plan

Protocol for obtaining a video sign language interpreter. If a client indicates needing captions, if able, provide captions on any video or audio content provided.

3. **Question 6**. If a client reports needing accommodations for a visual impairment, obtain or provide the indicated accommodations. For a list of accommodations, see Language Access Plan Section *Auxiliary aids and services* and *Delivery of auxiliary aids and services*. If the client reports needing information available in large print, follow the *Protocol for providing large print materials*. If the client reports needing information read aloud to them, ensure that all documents being completed with the client are read word by word to the client.

Referencing the Language Access Needs Assessment

When interacting with a client, always ensure that you confirm the client's preferred language. You can use an "I speak" card to do this. In addition, check to see if there is a completed Client Language Access Needs Assessment on file. If so, review the language access needs of the client and follow the appropriate protocol for providing the client with language access services. ***See Component 5: Delivery of Services.***

Additional Documentation

It is encouraged that all agencies document language preferences and language assistance needs of clients in any client files, notes, or other agency documents to ensure that all staff interacting with the client are aware of the language preferences, presence of a communication disability, and language assistance needs of the client.

Community Language Data Collection Form

The MSCHC will use the Community Language Data Collection Form, to document agency interactions with non-English speaking individuals and individuals who have a communication disability. The purpose of this data collection form is to collect data on commonly spoken languages in our community in order to ensure that MSCHC provided language access services are meeting the needs of our community. Please use this form to document any casual encounters your agency may have with non-English speaking individuals or individuals who have a communication disability, whether they reached out to your agency in-person, by phone, by email, or by other means. For any encounters for which you create an HMIS client profile or program enrollment, ***do not*** fill out the Community Language Data Collection form and instead follow the protocols for documenting client language and communication needs as outlined in

this Language Access Plan. See ***Protocol for documenting client language and communication needs in HMIS.***

COMPONENT 4: Providing Title VI Notices of availability of language access services and other signage

It is expected that all CoC agencies and staff will inform non-English speaking individuals and individuals with a communication disability of the availability of language access services at no cost by providing spoken and written Title VI notices in languages or through communication aids that LEP, deaf/hard of hearing, and visually impaired persons will understand.

Title VI notices inform clients of their rights to free interpretation and translation services under Title VI of the Civil Rights Act of 1964.

All Title VI notices provided by agencies must:
1. Be available in all languages listed on the [Shelby County Frequently Encountered Languages List](#)
2. Must inform the person of their rights under Title VI of the Civil Rights Act to free language access services
   a. Example: Under Title VI of the Civil Rights Act and the Americans with Disabilities Act, non-English speaking persons and persons who have a communication disability have a right to free language access services, including interpretation and translation in their preferred language.
3. Must inform the person of how to access language services. (i.e. Point to your language. A staff member will provide appropriate language access services.)

MSCHC provided Title VI notices

The consortium has available notice templates for use in agency spaces, online communications, and in agency materials, which can be found on the CAFTH [Language Access Webpage.](#)

Providing notice during initial client contact

It is expected that in addition to identifying and documenting the client's preferred language and communication needs during initial client contact, all staff make it known that language access services are available and can be provided at no cost to the client. This can be done by:

1. Having an interpreter or bilingual/multilingual staff member communicate with the client about the availability of language access services
2. By showing the client an "I speak" card in their preferred language and pointing to the notice of available free language services on the card
3. Pointing to or showing the client a printed notice in the preferred language of the client
4. Using phrases such as "do you need an interpreter" or "we have interpreters available" in the preferred language of the client. Visit the CAFTH Language Access Webpage for the Short Phrases Quick Guide Reference.

Title VI Notices in Physical Agency Spaces

All agencies must provide notices of the availability of language access services at no cost in all agency spaces. At a minimum, notices should be placed at the front/welcome desk, in any intake rooms/offices, and in any lobbies/waiting areas. Notices should also be placed in:
- Front door
- Gathering areas/common spaces
- On community resource boards
- In restrooms
- Areas with high client traffic
- Meeting rooms

Title VI Notices in Electronic and Telephone Communications

All agencies should provide notices of the availability of language access services at no cost in electronic and telephone communication.

This could include notices on:
- **Websites**
- Telephone menus
- **Social media platforms**
- Email signatures

Title VI Notices in Agency Materials

All agencies should provide written notice of the availability of language access services at no cost in client-facing materials. It is expected that notices should be printed on any intake forms, consent forms, applications, and notices of rights. Examples of other materials where notices are encouraged to be placed include:

- Brochures
- Pamphlets
- Resource materials
- Descriptions of services
- Program/activity rules and policies
- Flyers/Recruitment/Outreach Materials

Other Signage

In addition to Title VI notices letting clients know that language access services are available, it is encouraged that agencies put up additional signage in non-English languages to increase accessibility in their spaces. These can include welcome signs and directional signs directing clients to bathrooms, service areas/desks, intake offices, parking areas, etc. in non-English languages. See the CAFTH [Language Access Webpage](#) for translated signages.

COMPONENT 5: Delivery of services

MSCHC has partnered with LanguageLine Solutions to provide language access services to CoC program clients. All CoC member agencies are able to make use of this partnership for accessing language services following the protocols outlined below.

MSCHC provided language access services

The CoC and HMIS lead agency, Community Alliance for the Homeless, will provide the following services to be used by all CoC member agencies through LanguageLine Solutions:

- Phone Interpretation in over 200 languages. *For a list of LanguageLine Solutions offered languages list, see Appendix E.*
- Video Sign Language Interpretation (available in American Sign Language and British Sign Language)

Additionally, Community Alliance for the Homeless will provide vital document translation of select HMIS and CES forms that will be available for use by all CoC member agencies.

Lastly, Community Alliance for the Homeless and all CoC member agencies have an obligation to provide auxiliary aids and services, to the best of their ability, to clients who may have a communication disability by following the protocols outlined in this Language Access Plan. See ***Delivery of auxiliary aids & services.***

Contracted service provider - LanguageLine Solutions

LanguageLine Solutions is the MSCHC contracted language service provider. Community Alliance for the Homeless holds the contract with LanguageLine Solutions.

Services Available for CoC member agencies

All CoC member agencies will have access to phone interpretation and video sign language interpretation services through CAFTH's LanguageLine Solutions contract. **All CoC member agencies will be provided a 3-digit unique agency access code that will be required for accessing services through LanguageLine Solutions.**

For all other language services outside of phone interpretation and video sign language interpretation services, CoC member agencies will be unable to use CAFTH's contract with LanguageLine Solutions. We encourage all agencies desiring to use additional services to create an individual agency contract with LanguageLine Solutions.

Disclaimer:

- This is a pilot program for the Consortium, intended to ensure that non-English speaking clients in need of housing and homelessness services are provided with appropriate language access.
- Several member agencies provide activities and services outside of the scope of the Consortium's work. **The Consortium's language access services are solely to be used for a client's access to housing and homelessness services.**
- Several member agencies have existing contracts with language service providers, agency specific language access plans, and other resources. The Consortium's provided services are *not* intended to take the place of those, but to fill the gap for agencies without access to these services. Please continue to use your own agency's language services, if available.
- Every agency's use of the Consortium's LanguageLine contract is tracked. If it is suspected that services are being used for activities that fall outside of the scope of the Consortium's work, your agency may lose access to these services.

LanguageLine Solutions Account Executive Information

The MSCHC LanguageLine Solutions Account Executive is Joe Matthews. The Account Executive should be contacted only if an agency has questions or concerns specific to accessing LanguageLine Solution services. For all other questions and concerns about this Language Access Plan, please contact languageaccess@cafth.org.

Account Executive: Joe Matthews, phone: 831-648-7140, email: jmatthews@languageline.com

LanguageLine Solutions Resources

For additional information about LanguageLine Solutions services and resources, please visit the [LanguageLine Client Support Center](#).

Providing interpretation services

Interpretation is the translation of spoken word from one language to another in real time, either person to person, over the phone, or via video.

When an interpreter should be contacted

An interpreter should be contacted when there is any inability of the client to fully understand or comprehend spoken or written information, and/or fully communicate with a staff member due to the presence of a language barrier. Staff are encouraged to use best judgment when deciding to contact an interpreter. Client's meaningful and timely access to all services should be prioritized.

An interpreter should be contacted in the following circumstances:
- When it is identified that a client cannot read, write, speak, or understand English. An interpreter should be contacted in situations where a client may be able to speak English but has difficulty reading or writing in English
- When two-way communication, either through spoken or written word, with the client is not working due to a language barrier
- If a non-English speaking client is denying the use of CoC provided language access services, an interpreter must be contacted to complete the ***waiver of client's rights to translation and interpretation services.***
- When staff are not able to identify the preferred language of the client
- When completing any documents considered vital and necessary for a client's full understanding of services and rights and responsibilities, with a non-English speaking client or a client who cannot read or write English. ***See Vital documents.***
- When completing any documents or forms that are of a legal nature with a non-English speaking client or a client who cannot read or write English

Role of interpreters in client-staff interactions

An interpreter's role is to translate spoken information from one language to another. An interpreter's role is ***not*** to facilitate an interaction with a client. Staff members are in the role of

driving the conversation. When using an interpreter during a client-staff interaction, follow all protocols and communicate in the same way as you would with a client who does not need the assistance of an interpreter. Be mindful that everything you say will be interpreted.

Protocol for obtaining a LanguageLine Solutions phone interpreter

A. Obtaining a phone interpreter for an in-person client-staff interaction

Follow the below protocol for obtaining a LanguageLine phone interpreter when you are face-to-face with a client.

Starting the Session:
Step 1: Inform the client that you are contacting an interpreter. It is encouraged that staff do this using the preferred language of the client. Visit the CAFTH language access webpage for Short Phrase Quick Guide References.
Step 2: Dial the LanguageLine toll free service number **(866)-874-3972**.
Step 3: Follow the prompts and provide CAFTH's Client ID#, 704119, your agency name, and agency specific 3-digit access code. *If you are unsure of your agency specific 3-digit access code, please contact languageaccess@cafth.org.*
Step 4: Indicate which language you are requesting interpretation for.
Step 5: Record the interpreter's name and interpreter ID for reference and document in HMIS client notes as receipt of service.
Step 6: Place the call on speaker or pass the phone back and forth between you and the client.
Step 7: Introduce yourself to the interpreter.
Step 8: Brief the interpreter on your interaction with the client, including the client's name, and state the goal of the session and provide any specific instructions. If completing a document(s) with the client, tell the interpreter which document(s) you are using.

Ending the Session:
Step 9: Ask the client if they understood, or if they have any questions or concerns.
Step 10: Allow the interpreter to interpret everything before ending the session.
Step 11: Say "end of call" to the interpreter to complete the call.

B. Obtaining an interpreter for a telephone client-staff interaction

Follow the below protocol for obtaining a LanguageLine phone interpreter when you are interacting with a client over the phone.

When receiving an inbound call from a client:

Starting the Session:
Step 1: Inform the client that you are contacting an interpreter and place the client on hold. It is encouraged that staff do this using the preferred language of the client. Visit the CAFTH language access webpage for Short Phrase Quick Guide References.
Step 2: Dial the LanguageLine toll free service number **(866)-874-3972**.
Step 3: Follow the prompts and provide CAFTH's Client ID#, 704119, your agency name, and agency specific 3-digit code. *If you are unsure of your agency specific 3-digit code, please contact languageaccess@cafth.org.*
Step 4: Indicate which language you are requesting interpretation for.
Step 5: Record the interpreter's name and interpreter ID for reference and document in HMIS client notes as receipt of service.
Step 7: Introduce yourself to the interpreter.
Step 8: Brief the interpreter on your interaction with the client, including the client's name, and state the goal of the session and provide any specific instructions. If completing a document(s) with the client, tell the interpreter which document(s) you are using.
Step 9: Add the LEP caller on the line.

Ending the Session:
Step 9: Ask the client if they understood, or if they have any questions or concerns.
Step 10: Allow the interpreter to interpret everything before ending the session.
Step 11: Say "end of call" to the interpreter to complete the call.

When placing an outbound call to a client:

Starting the Session:
Step 1: Dial the LanguageLine toll free service number **(866)-874-3972.**
Step 2: Follow the prompts and provide CAFTH's Client ID#, 704119, your agency name, and agency specific 3-digit code. *If you are unsure of your agency specific 3-digit code, please contact languageaccess@cafth.org.*
Step 4: Indicate which language you are requesting interpretation for.
Step 5: Record the interpreter's name and interpreter ID for reference and document in HMIS client notes as receipt of service.
Step 6: Introduce yourself to the interpreter.
Step 7: Brief the interpreter on your interaction with the client, including the client's name, and state the goal of the session and provide any specific instructions. If completing a document(s) with the client, tell the interpreter which document(s) you are using.

Step 8: Ask the interpreter to dial the client or place the interpreter on hold and conference in the LEP.

Ending the Session:
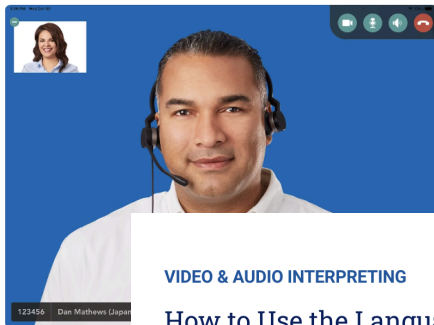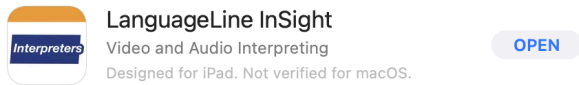**Step 9:** Ask the client if they understood, or if they have any questions or concerns.
Step 10: Allow the interpreter to interpret everything before ending the session.
Step 11: Say "end of call" to the interpreter to complete the call.

Protocol for obtaining a LanguageLine Solutions video interpreter

Video interpretation is available for clients who communicate via sign language. Video sign language interpretation is available in American and British Sign Language. **Please only use video interpretation services for sign language interpretation only.**

Step 1: Download the LanguageLine Solutions Insight application on a phone or computer. To download, open the app store on your device and download the app or visit Insight.LanguageLine.com. For help downloading or using the app, please visit LanguageLine Solutions.
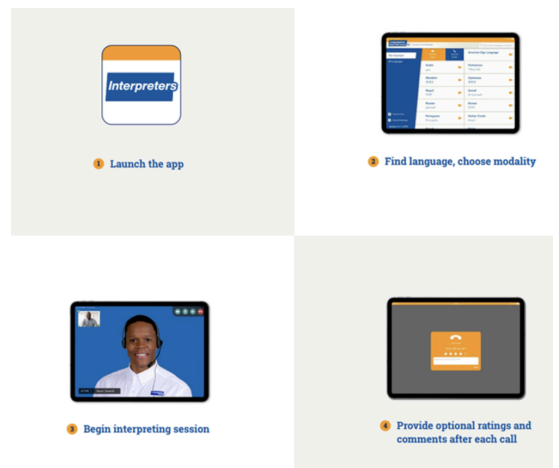
Step 2: Launch the app on your device. Name your device. To name your device please use the following format: Last Name_First Name_Agency Name

Step 3: Provide Authentication Code, **3KDQ3XMGTG**, and tap on the activate device button to complete authentication. Once completed, the application will open to the language selection screen below.
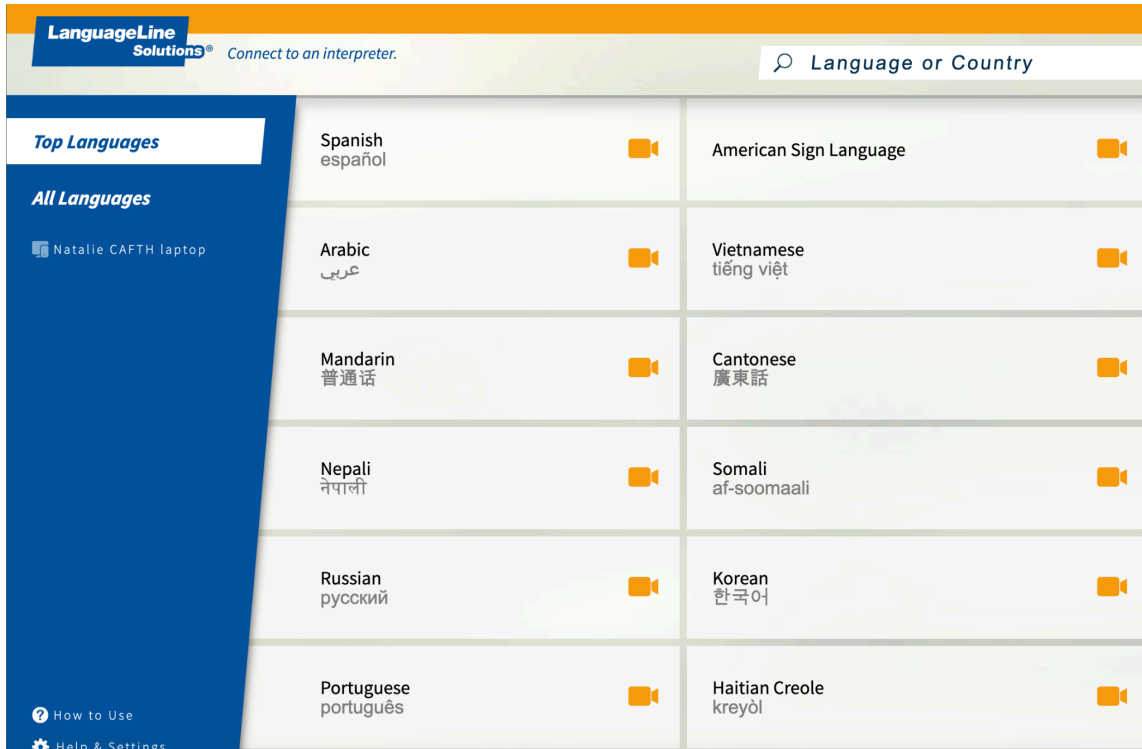
Step 4: Select the needed language.

Step 5: Position device for viewing by client.

Step 6: Record the interpreter's name and interpreter ID for reference and document in HMIS client notes as receipt of service.

Step 7: Introduce yourself to the interpreter.

Step 8: Brief the interpreter on your interaction with the client, including the client's name, and state the goal of the session and provide any specific instructions. If completing a document(s) with the client, tell the interpreter which document(s) you are using.

Ending the Session:
Step 9: Ask the client if they understood, or if they have any questions or concerns.
Step 10: Allow the interpreter to interpret everything before ending the session.
Step 11: Say "end of call" to the interpreter to complete the call.

Protocol for completing documents with a client when using an interpreter

When completing any documents with a client, an interpreter's role is only to ensure the client comprehends and understands the content of the document. The staff's role is to explain the contents of and administer the document.

A. When a translated document is available

When completing a document with a client where a translated version is available in the client's preferred language, follow the steps below:

Step 1: Obtain an interpreter following the ***Protocol for obtaining an interpreter****.*
Step 2: Explain to the interpreter which documents you are completing with the client.
Step 3: Obtain and provide the client with an English version and translated version of the document in the client's preferred language. Select Spanish translated HMIS & CES forms are available on CAFTH's Language Access Webpage.
Step 4: Explain to the client that the translated document is the same as the English version of the document. Explain the purpose and contents of the document to the client and that an interpreter will be assisting to ensure the client comprehends and understands the contents of the document.
Step 5: Read the document sentence by sentence or line by line and then wait for the interpreter to translate the content to the client. If filling out a document with questions, read each question and wait for the interpreter to translate, then proceed to read each answer choice.
Step 6: Collect client signature, if needed.
- For documents that require a client's signature, explain to the client that the English version of the document is the legally binding document.
- Have client sign both the English and translated version of the document.
Step 7: Upload documents to HMIS, if needed.
- For any HMIS, CES or other documents requiring upload to HMIS, upload both the English and translated signed documents into HMIS

B. When a translated document is *not* available

When completing a document with a client where a translated version is *unavailable* in the client's preferred language, follow the steps below:

Step 1: Obtain an interpreter following the ***[Protocol for obtaining an interpreter](#)***.
Step 2: Explain to the interpreter which documents you are completing with the client.
Step 3: Obtain and provide the client with an English version of the document.
Step 4: Explain the purpose and contents of the document to the client and that an interpreter will be assisting to ensure the client comprehends and understands the contents of the document.
Step 5: Read the document sentence by sentence or line by line and then wait for the interpreter to translate the content to the client. If filling out a document with questions, read each question and wait for the interpreter to translate, then proceed to read each answer choice.
Step 6: Collect client signature, if needed.
Step 7: Upload document to HMIS, if needed.
- For any HMIS, CES or other documents requiring upload to HMIS, upload both the English and translated signed documents into HMIS

Working with a LanguageLine Solutions interpreter

When working with an interpreter from LanguageLine Solutions, remember to:
- Note the interpreter's name and number for your records
- Introduce yourself and the client
- Brief the interpreter about the call
- Speak directly to the client, ***not*** the interpreter
- Speak in a normal tone and use short sentences, using 3-5 sentence segments and pausing at the end of a thought
- Allow interpreter time to interpret. Using an interpreter can take additional time, be sure to allow appropriate time for back and forth interpretation between staff, client and interpreter
- If you sense that the client does not understand, try to rephrase or explain in a different manner or repeat what you have heard
- Avoid jargon like slang and complicated technical terms
- Remember, everything you say will be interpreted
- Be patient and respectful
- Check for client's understanding of the information

Translation Services

Vital Documents

HUD requires that vital documents be translated and readily available in the [frequently encountered languages of the service area](#). HUD defines vital documents as those that are "critical for ensuring meaningful access" to programs, services, and activities by clients.

Further, the Department of Justice (DOJ) defines vital documents as those that contain information "that is critical for obtaining the federal services and/or benefits, or is required by law. Vital documents include, for example: applications; consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; [...] and letters or notices that require a response from the beneficiary or client."

All CoC agencies should have vital documents, as identified by the CoC and listed below, translated into the community's [frequently encountered languages](#).

Translation responsibilities of CoC lead agency

There are documents that are part of standard operating procedures for the CoC, including use of HMIS and the Coordinated Entry System (CES). The CoC lead agency, Community Alliance for the Homeless, will be responsible for the translation of the following documents. CoC member agencies are responsible for presenting the appropriate translated documents to the client. The following documents will be translated in three phases. All available translated documents can be found on CAFTH's [Language Access Webpage](#).

First phase of document translation - Spanish Translation of the following documents
Goal: By August 1st, 2024
1. HMIS Release of Information Form (ROI)
2. CDB Release of Information Form (ROI)
3. Notices of non-discrimination
4. CES Forms including:
    a. Coordinated Entry System Grievance Form
    b. Verification of Disability
    c. Verification of Homelessness - Self Certification
    d. Verification of Homelessness - Third Party
5. Language Access Plan Documents including:

e. Waiver of Client's Rights to Interpretation and Translation Services

Second phase of document translation - Translation of the following documents in all other [frequently encountered languages](#)

Goal: By the beginning of 2025 - 2026 MSCHC year, July 1st, 2025

1. HMIS Release of Information Form (ROI)
2. CDB Release of Information Form (ROI)
3. Notices of non-discrimination
4. CES Forms including:
   a. Coordinated Entry System Grievance Form
   a. Verification of Disability
   b. Verification of Homelessness - Self Certification
   c. Verification of Homelessness - Third Party
5. Language Access Plan Documents including:
   d. Waiver of Client's Rights to Interpretation and Translation Services

Third phase of document translation - Translation of the following additional documents into all [frequently encountered languages](#)

Goal: By the beginning of 2025 - 2026 MSCHC year, July 1st, 2025

1. All HMIS Intake, Status, and Exit Forms
2. All CDB Intake, Status, and Exit Forms
3. Coordinated Entry Assessments/CES Questionnaire
4. YHDP forms including
   a. YHDP Assessment
   b. YHDP Intake, Status, and Exit Form

Translation responsibilities of agencies:

Each CoC agency operates different services and housing programs. All CoC agencies should make client-facing documents available in the frequently encountered languages and store these documents in a place that is accessible by all staff and employees. At a minimum, CoC member agencies should ensure the following translated documents are readily available. *If an agency cannot provide a needed translated document, an interpreter must be contacted for any client-staff interaction for which there is a language barrier.*

- Program Policies and Rules Documents
- Program Applications
- Program Termination Policies

- Release of Information/Privacy and Confidentiality Forms
- Screening/intake/Assessment Forms
- Participant Rights/Responsibilities Forms
- Consent Forms
- Grievance Forms

If translation of these documents is burdensome or financially limiting to agencies, agencies can opt to forgo translation of documents, and instead include a "language disclaimer" translated into the most frequently encountered languages at the bottom of these documents stating that an interpreter is available upon request.

Example disclaimer:
"Under Title VI, you are entitled to free interpretation and translation services. Please let a staff member know if you need an interpreter."

Template disclaimers that can be added to existing documents can be found on the CAFTH language access webpage.

Documents of a legal nature

For any documents that are legally binding, HUD confirms that the English version prevails over the translated version. For any legally binding documents, clients must:
1. Be informed that the translated document provided to them is a translated version of a legally binding document that is meant to assist in their understanding of their rights and obligations
2. Be informed that the English version of the document is the official, legal, controlling document
3. Sign both the translated document and the English document

For completion of any legally binding document when there is a language barrier present between staff and client, an interpreter *must* be contacted to ensure the client's full understanding of the document. See *Protocol for obtaining an interpreter* and *Protocol for completing documents with a client when using an interpreter*.

Use of machine interpretation and translation apps

The use of machine interpretation and translation apps such as Google translate, Microsoft Bing Translator, as well as other web-based apps has become more common. Machine Translation

produces word for word translation that may be fluent but not always accurate and does not take into consideration meaning and context, as human translation can. Federal Guidance requires that all communication relating to a client's meaningful and timely access to activities, programs, and services must be competent and accurate. Therefore, Federal Guidance cautions against the use of web-based automated translations due to inaccuracies in meaning and context of translated content.

Use of machine translation should solely be used for the following purposes:
- Informal conversations unrelated to the "meaningful access" to activities, services, or programs
- Preliminary communication such as a greeting, letting a client know you are contacting language access services, and for retrieving basic client information such as name, preferred language, and contact information

Machine translations **should not** be used during any interactions in which information pertaining to a client's access to an agency's activities, services, programs, or client rights are discussed. In any communication that involves an explanation of services or programs, client eligibility, or the collection of client information or completion of documents necessary for access to programs or services, a trained interpreter must be contacted and documents translated by a trained translator should be provided, if available.

Delivery of auxiliary aids and services

Is it expected that all CoC member agencies offer and provide, to the best of their ability, the following auxiliary aids and services to clients who have a hearing or visual impairment.

For clients with a hearing impairment:
- Notetaker - A staff member who can effectively, accurately, and impartially write notes for someone who is deaf/hard of hearing
- Provision of a trained sign language interpreter. LanguageLine Solutions offers video Sign Language Interpretation. See _**Protocol for obtaining a video sign language interpreter**_.
- Provision of written materials and printed scripts (i.e. printed documents, printed scripts of meetings or communications)
- Provision of real-time captioning, creation of captions that appear on a screen at the same time content is being played or words are spoken

For clients with a visual impairment:

- Reader - A staff member who can effectively, accurately, and impartially read information to someone who has a visual impairment
- Provision of information in large print. See ***Protocol for providing large print materials.***
- Provision of audio recordings of printed information

Protocol for providing large print materials

The following guidelines for provision of large print materials were adopted by the American Council of the Blind (ACB) Board of Publications[4] in 2022 and referenced in ADA guides. Please format documents using the following guidelines for any client requesting documents in large print.

Font Type - Large Print materials should be in a sans serif font such as Arial

Font Size - Materials should be in 18 pt font

Spacing - Materials should have 1.15 line spacing

Headings - Materials should have headings that are flush left, bolded. Headings should be 22 pt font, subheadings 20 pt font.

Paragraphs - Blocked with 1 blank line before and between heads/subheadings and text.

Waiver of client's rights to translation and interpretation services

In the event that a client requests interpretation from an adult family member or friend and/or refuses the use of CoC provided language access services, staff must:

1. Document that the individual was offered language assistance free of charge
   AND
2. Obtain written consent that waives the client's rights to translation and interpretation services

To do so, staff must provide the individual with a Waiver of Client's Rights to Translation and Interpretation Services in their preferred language. Translated waivers can be found on the CAFTH language access webpage. See Appendix D for the English version of the waiver. All completed waivers must be uploaded to a client's profile within HMIS. In order to complete the

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[4] American Council of the Blind (ACB) Large Print Guidelines.

waiver, staff must obtain a trained interpreter or trained bilingual/multilingual staff member to convey the content of the waiver form to the client. *Family and friends should not be used to complete the waiver with a client.* **See** *[Protocol for obtaining an interpreter](#)* and *[Protocol for completing documents with a client when using an interpreter](#)*.

COMPONENT 6: Quality of services and competency of translators and interpreters

HUD expects that all federally funded recipients ensure the competency and quality of any translation and interpretation services contracted with or used. The CoC will follow HUD's guidelines to ensure all CoC member agencies are providing high quality language services. Where individual rights depend on precise, complete, and accurate interpretation or translations, the use of trained interpreters and translators who hold an interpretation and translation certificate is ***strongly encouraged***.

With the exception of the following sections: *[Use of bilingual/multilingual staff as interpreters and translators](#)*, *[Use of family members and friends as interpreters and translators](#)*, and *[Use of machine interpretation and translation apps](#)*, staff should exclusively use trained and certified interpreters and translators, either through your individual agency's contracted language access service provider, if available; the CoC provided language access service provider; or trained and certified bilingual/multilingual staff whose job responsibilities include providing interpretation and translation services. Untrained staff, family members, friends, neighbors, untrained volunteers and bystanders, should not be used except in emergency situations as outlined in *[Interpretation and translation during emergency situations](#)*. **Children, under no circumstances should be used as an interpreter.**

All services provided through LanguageLine Solutions are provided by professionally trained and certified interpreters and translators and meet HUD regulatory criteria for ensuring quality of provided services.

HUD recommendations on ensuring competency and quality of interpreters and translators:

When using interpreters, it is expected interpreters will:
- Demonstrate proficiency in both English and the other language and identify and employ the appropriate mode of interpretation (real-time, consecutive, etc.)
- Have knowledge in both languages of technical/specialized terms or concepts unique to the program/service being provided.

- Understand role as solely interpreter - not deviating into a role of counselor, legal advisor, other roles, etc.
- When needed and is reasonable, interpretation should be provided in a timely manner. One clear guide is to ensure that language assistance should be provided at a time and place that does not result in the denial of the service or benefit, impose an undue burden on the client who is seeking services, or cause significant delay in the receipt of services as compared to an English-proficient person.
- Understand and follow the obligation to maintain client confidentiality
- Understand the roles of interpreters and translators and the ethics associated with those roles

Use of bilingual/multilingual staff as interpreters and translators

It is recognized that several CoC member agencies have bilingual and multilingual staff members whose job responsibilities include providing interpretation and translation services.

HUD guidance cautions that being bilingual/multilingual does not necessarily mean that a person has the ability to interpret or translate. As well, it is important to consider when the role of interpreter may conflict with the responsibilities and roles of the bilingual/multilingual employee. MSCHC encourages the use of bilingual/multilingual staff members who are trained and certified interpreters and/or translators. For bilingual and multilingual staff whose job responsibilities *do not include* provision of interpretation and/or translation services and/or are not trained interpreters or translators, they may voluntarily serve as interpreters and translators at will only when no other language access services may be available, keeping in mind the above HUD considerations. When completing any documents that are of a legal nature with a client, a trained interpreter *must* be contacted.

Use of family members and friends as interpreters and translators

In emergency situations, or at the request of the client, adult family and friends may be used as interpreters. **Children, under no circumstances, should be used as interpreters or translators.** It is imperative that all clients are made aware of the availability of language access services *and* offered services before family members or friends step into the role of interpreter. If a client refuses the use of CoC provided language access services, a waiver of client's rights to translation and interpretation services *must* be completed. **See** *waiver of client's rights to interpretation and translation services.* The MSCHC follows the below HUD considerations and best practices for use of family members and friends as interpreters.

HUD considerations and best practices for using family members and friends as interpreters
- Adult family members should only be considered and used as interpreters in emergency situations where an interpreter is unavailable, or by request of the client after other language access services have been offered and where issues of confidentiality, conflict of interest, or the need for accuracy are minimized.
- When using family members or friends as interpreters, it is imperative to ensure that sensitive information is interpreted accurately and in an unbiased manner (i.e. client's rights, healthcare or medical information, housing information, financial information, law enforcement involvement, experiences of sexual, domestic violence or assault, etc.)
- If the client chooses to use a friend, family member, or other preferred interpreter not offered by the agency, the service provider must ensure that the choice is voluntary and the client is aware of any possible problems that could occur related to confidentiality, inaccuracy of information, and conflicts of interest.

Interpretation and translation during emergency situations

In emergency situations, it is important that the basic needs of the individual are met. In these situations, the use of untrained interpreters, untrained bilingual/multilingual staff, or the use of adult family members and adult friends, or machine translation may be necessary. **Children, under no circumstances, should be used as interpreters or translators, even in emergency situations.** Once the emergency situation has passed, please follow outlined protocols for documenting the language and communication needs of the client and obtain appropriate language access services.

COMPONENT 7: Staff training

All CoC agency staff and employees must be trained on the legal obligations for providing meaningful language access services to LEP individuals and individuals who have a communication disability. All staff employed at a CoC member agency are required to attend training provided by the CoC lead agency in order to use the language access services provided as part of consortium membership.

Annual CoC language access training

The CoC lead agency, Community Alliance for the Homeless, will provide annual training on this Language Access Plan, implementation of the policies and procedures in the plan, Title VI and ADA obligations for federal financial recipients, and cultural and language sensitivity training. All CoC staff will be required to attend language access training annually.

Training for new employees

All new hires at CoC member agencies will be required to receive language access training upon hire. A recording of the annual CoC Language Access Training will be made available on the CAFTH Language Access Webpage, and will fulfill the training requirement for new hires. All new employees should be provided with the Language Access Plan at onboarding.

Use and promotion of LAP Protocols and Procedures

Flowchart protocols of the following will be developed as part of this language access plan and available on the CAFTH Language Access Webpage for streamline provision of language access services.

- Protocol for accessing a phone interpreter
- Protocol for accessing a video sign language interpreter
- Protocol for identifying client language and communication needs & using "I speak" cards
- Protocol for documenting client language and communication needs in HMIS
- Protocol for completing translated documents while using an interpreter
- Protocol for completing the Client Language Access Needs Assessment

These flowchart procedures should be posted in all agency spaces that receive clients including front desks, offices, and in outreach materials for easy access by staff.

COMPONENT 8: Monitoring and evaluation of the Language Access Plan

The CoC lead agency, Community Alliance for the Homeless, will conduct an annual review of the Language Access Plan protocols and an annual assessment of available community data on languages spoken, non-English speakers, and language access needs of the service area population.

Assessment of Implementation of LAP Protocols and Procedures

To assess the implementation of LAP protocols among CoC member agencies, the CoC lead agency will:

- Solicit feedback from CoC member agencies on use of language access services, if language access services in place are meeting the needs of LEP communities, and needs for additional training or services, via an annual community wide survey.
- Conduct a CoC member agency staff survey to assess staff's understanding of LAP protocols.
- Monitor response rates to complaints or suggestions by LEP individuals, community members, or CoC member agency staff regarding the MSCHC provided language access services.

Assessment of Community Language Access needs

In order to ensure the relevancy of our vital documents list and the Shelby County Frequently Encountered Languages lists, the CoC will conduct an annual assessment of vital document translation needs which will include:
- Soliciting feedback from CoC member agencies on additional translation needs including revision to the vital documents translation requirements and frequently encountered language list
- Review community data from HMIS on preferred languages and communication abilities of clients to ensure relevancy of frequently encountered language list and requirements of HUD's Safe Harbor rules for translation of vital documents
- Review LanguageLine Solutions usage data reports to capture frequently encountered languages and document recurrent or frequent service requests to ensure protocols are aligned with the demand of services

Component 9: Language Access Complaints and Grievance Policy

Any person who believes they have been denied the benefits of this Language Access Plan or that the MSCHC lead agency, Community Alliance for the Homeless, or any CoC member agency or staff, have not complied with Title VI of the Civil Rights Act, ADA Effective Communication Requirements, or Section 504 of the Rehabilitation Act of 1973, may file a complaint as per the MSCHC Grievance Policy and Procedures.

Appendix A: Definitions

American Sign Language (ASL): a complete, natural language that has the same linguistic properties as spoken languages, with grammar that differs from English that is often used by Deaf/Hard of hearing individuals as their preferred language. ASL is expressed by movements of the hands and face and primarily used in the United States and Canada.

Auxiliary Aids and Services: Those services necessary to provide language assistance for individuals who have a communication disability, such as individuals who are Deaf/hard of hearing or who may have a visual impairment.

Bilingual/Multilingual: describes a person who has demonstrated proficiency in reading, writing, speaking or understanding two or more languages.

Deaf/deaf: Deaf with an uppercase 'D' refers to an identity with its own culture, and language. The Deaf community is made up of diverse people with varying levels of hearing loss. The term deaf with a lower case 'd' is the medical term used to describe hearing loss. Both terms may be used to refer to a person with hearing loss resulting in little to no functional hearing.

Effective Communication: Communication that results in an individual's ability to communicate with, receive information from, and convey information to another person.

Hard of Hearing: a term used to describe an individual with mild to moderate hearing loss.

Interpretation: The process of transferring **spoken or signed** communication from one language into another language.

Language Access: The process of ensuring non-English speaking individuals, and individuals with a communication disability including, deaf/hard of hearing and visually impaired individuals, are able to access and comprehend information and services, and participate in programs, at a level equal to English-proficient, hearing, and visually unimpaired individuals.

Language Access Services: Oral and written language services needed to assist limited English proficient (LEP) individuals and individuals with a communication disability in communicating effectively resulting in an equal opportunity to participate fully in services, activities and programs offered.

Meaningful Access: Language assistance that results in communication that is accurate, timely, and effective and is provided at no cost to an individual and does not result in restrictions, delays, or inferiority of services, programs, or activities provided to English proficient individuals, hearing, and visually un-impaired individuals.

Persons with Limited English Proficiency (LEP): Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. Persons with LEP may be competent in English for certain types of communication, but still be LEP for other purposes.

Preferred/Primary language: The language that an individual prefers to communicate in.

Translation: The process of converting *written* information from one language into another.

Vital Document: Paper or electronic written material that contains information that is critical for accessing a program or activity or is required by law. Vital documents include applications, leases, consent and complaint forms, program policies and rules, notices of termination, notices of rights, notices advising persons who are LEP of the availability of free language assistance.

Appendix B: Shelby County Frequently Encountered Language List

Shelby County Frequently Encountered Languages List

As determined by the Four Factor Analysis and through community discussion and data collection, the following languages are considered frequently encountered languages within Memphis and Shelby County and also meet HUD's safe harbor threshold for written translation requirements. Interpretation services should be accessible for all of the listed languages. Additionally, all notices of availability of language access services, "I speak" cards, vital documents, and other materials as outlined in this Languages Access Plan should be translated and made available in the following languages:

- Spanish
- Vietnamese
- Chinese including both Mandarin and Cantonese
- Arabic
- African languages *At this time, Community Alliance for the Homeless does not have data that breaks down the most frequently encountered African languages within our community. It is recognized that African languages are commonly spoken in Memphis and Shelby County. As we collect additional information, we intend to update this guide with exact language names.*
- Urdu
- American Sign Language *ASL is not a written language and therefore, documents are not translated into ASL. However, ASL must be a language option on all "I speak" cards and Title VI notices. ASL interpretation must be provided upon request.*

*At time of implementation of this Language Access Plan for the 2024 - 2025 MSCHC year, all "I speak" cards and notices of free language access services will be available in these frequently encountered languages. However, at this time, we do not have the capacity to translate all vital documents and agency materials into all these languages. We are meeting these expectations by providing interpretation services for these languages, and translating select HMIS and CES forms into Spanish. Our goal is to have all vital documents translated into these frequently encountered languages for the 2025 - 2026 MSCHC year.

Appendix C: Client Language Access Needs Assessment

Client Language Access Needs Assessment

The Client Language Access Needs Assessment is meant to collect additional language data for clients who are non-English speaking and/or have a communication disability. This assessment should *only* be done with clients who indicate an interpretation or translation assistance need and/or a communication assistance need. For clients who do not report a need for this type of assistance, a client language access needs assessment *is not* necessary.

PROVIDER DIRECTIONS:

Step 1: Identify the client's preferred language and communication needs following the Language Access Plan **Protocol for identification of client language and communication needs**

Step 2: Create an HMIS profile for the client, completing the following Language Access fields in HMIS on the program enrollment page:
- · Client Preferred Language
- · Interpretation and Translation Assistance Needs
- · Communication Assistance Needs

If client reports yes to interpretation and translation assistance needs and/or communication assistance needs, continue to Step 3. STOP here and do not complete this assessment if client reports no interpretation and translation assistance needs AND no communication assistance needs.

Step 3: If needed, contact an interpreter. (i.e. for a non-English speaking client or a client who is deaf/hard of hearing). Follow the Language Access Plan **Protocol for obtaining an interpreter**.
- a. An interpreter should be contacted if there is any language barrier between client or staff or an inability of the client to fully communicate with or understand staff.

Step 4: Complete the Client Language Access Needs Assessment. If using an interpreter, follow the **Protocol for completing documents when using an interpreter**.

Step 5: Input answers to the assessment in HMIS
- a. Complete the Client Language Access Needs Assessment in HMIS under the client's profile

PROVIDER/INTERPRETER SCRIPT:

You indicated that you needed interpretation and translation assistance and/or communication assistance. The purpose of this assessment is to gather additional information about your interpretation and translation and/or communication assistance needs to ensure that our staff can best meet your needs.

Are you ready to start?

With the client's permission, complete the Client Language Access Needs Assessment.

LANGUAGE ACCESS NEEDS ASSESSMENT:

If client checked YES for interpretation and translation assistance needed, complete questions 1-4. If client checked NO for interpretation and translation assistance needed, skip questions 1-4, marking the answer choices 'not applicable' and continue to question 6.

1. **What language do you prefer to speak or sign in?**

o	Arabic	o	Somali
o	Cantonese	o	Spanish
o	Chinese (Mandarin)	o	Swahili
o	English	o	Swedish
o	French	o	Tagalog
o	German	o	Ukrainian
o	Haitian Creole	o	Urdu
o	Hawaiian	o	Vietnamese
o	Hebrew	o	Yoruba
o	Hindi	o	American Sign Language
o	Italian	o	British Sign Language
o	Jamaican Patois	o	Other _____
o	Japanese	o	Client doesn't know
o	Korean	o	Client prefers not to answer
o	Portuguese	o	Data not collected
o	Russian	o	Not applicable

2. What language do you prefer to write in?

o	Arabic	o	Somali
o	Cantonese	o	Spanish
o	Chinese (Mandarin)	o	Swahili
o	English	o	Swedish
o	French	o	Tagalog
o	German	o	Ukrainian
o	Haitian Creole	o	Urdu
o	Hawaiian	o	Vietnamese
o	Hebrew	o	Yoruba
o	Hindi	o	American Sign Language
o	Italian	o	British Sign Language
o	Jamaican Patois	o	Other _____
o	Japanese	o	Client doesn't know
o	Korean	o	Client prefers not to answer
o	Portuguese	o	Data not collected
o	Russian	o	Not applicable

3. What language do you prefer to receive spoken or signed information in?

o	Arabic	o	Somali
o	Cantonese	o	Spanish
o	Chinese (Mandarin)	o	Swahili
o	English	o	Swedish
o	French	o	Tagalog
o	German	o	Ukrainian
o	Haitian Creole	o	Urdu
o	Hawaiian	o	Vietnamese
o	Hebrew	o	Yoruba
o	Hindi	o	American Sign Language
o	Italian	o	British Sign Language
o	Jamaican Patois	o	Other _____
o	Japanese	o	Client doesn't know
o	Korean	o	Client prefers not to answer

o	Portuguese	o	Data not collected
o	Russian	o	Not applicable

4. What language do you prefer to receive written information in?

o	Arabic	o	Somali
o	Cantonese	o	Spanish
o	Chinese (Mandarin)	o	Swahili
o	English	o	Swedish
o	French	o	Tagalog
o	German	o	Ukrainian
o	Haitian Creole	o	Urdu
o	Hawaiian	o	Vietnamese
o	Hebrew	o	Yoruba
o	Hindi	o	American Sign Language
o	Italian	o	British Sign Language
o	Jamaican Patois	o	Other _____
o	Japanese	o	Client doesn't know
o	Korean	o	Client prefers not to answer
o	Portuguese	o	Data not collected
o	Russian	o	Not applicable

If client checked YES for communication assistance needed, complete questions 5 and 6. If client selected NO for communication assistance needed, skip question 5 and 6, marking the answer choice 'not applicable' and finish the assessment.

5. Do you have difficulty hearing and/or have a hearing impairment requiring accommodations?
  o Yes
  o No
  o Client doesn't know
  o Client prefers not to answer
  o Data not collected
  o Not applicable

5a. If yes, what accommodations do you need? (*Check all accommodations needed*)
- o American Sign Language interpretation
- o British Sign Language interpretation
- o Notetaker
- o Captions provided on video content
- o Written materials and printed scripts

6. Do you have a visual impairment that requires accommodations?
- o Yes
- o No
- o Client doesn't know
- o Client prefers not to answer
- o Data not collected
- o Not applicable

6a. If yes, what accommodations do you need? (*Check all accommodations needed*)
- o Large print materials
- o Written materials read aloud
- o Audio recording of printed information

POST COMPLETION PROVIDER INSTRUCTIONS:

The questions on the Client Language Access Needs Assessment are intended to collect additional information about a client's language access needs, so staff are able to obtain the appropriate services. After completion of the assessment with a client, please follow the below instructions, referencing the MSCHC Language Access Plan to ensure the client is provided appropriate language access services.

1. **Questions 3-4.** These questions are designed to ensure that the client is given both spoken and written information in a language they understand. Please ensure to obtain an interpreter when interacting with a client who prefers to receive spoken information in a non-English language (question 3). When completing documents with the client, provide the client with translated documents in the language they prefer to receive written information in (question 4), when available. All HMIS and CES translated documents can be found on CAFTH's Language Access Webpage. See Language Access Plan ***Component 5: Delivery of services***.

2. Question 5. If a client reports needing accommodations for a hearing impairment, obtain or provide the indicated accommodations. For a list of accommodations, see Language Access Plan Sections ***Auxiliary aids and services*** **and** ***Delivery of auxiliary aids and services***. For obtaining a sign language interpreter follow the Language Access Plan ***Protocol for obtaining a video interpreter.*** If a client indicates needing captions, if able, provide captions on any videos or audio content provided.

3. Question 6. If a client reports needing accommodations for a visual impairment, obtain or provide the indicated accommodations. For a list of accommodations, see Language Access Plan Section ***Auxiliary aids and services*** **and** ***Delivery of auxiliary aids and services****.* If the client reports needing information available in large print, follow the Language Access Plan ***Protocol for providing large print materials****.*
If the client reports needing information read aloud to them, ensure that all documents being completed with the client are read word by word to the client.

If you have any questions in regards to the Client Language Access Needs Assessment or delivery of language access services please contact languageaccess@cafth.org.

Appendix D: Waiver of Client's Rights to Interpretation and Translation Services

Waiver of Rights to Interpretation and Translation Services

In the US, Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act (ADA) requires organizations, programs, or activities that receive federal financial assistance to take steps toward providing language access. Under Title VI and the ADA you are entitled to free language access services including interpretation, translation, and auxiliary aids and services offered by a trained interpreter or translator free of charge at this agency.

Date: _____

Case Manager and/or interpreter information: _____

Name of agency providing services: _____

Client Name: _____

HMIS ID (if applicable): _____

I, _____ understand that under Title VI and the ADA, I have the right to interpretation, translation, and auxiliary aids and services provided to me free of charge. I acknowledge that a staff member at this agency explained this right to me or obtained a trained interpreter to explain this right to me in my preferred language.

I understand that this agency provides this service free of charge for its non-English speaking clients and clients who may have a communication disability, including clients who are Deaf/hard of hearing or who have a visual impairment, and that these services can be provided to me over the telephone or via video (for sign language interpretation).

I acknowledge that this staff person or interpreter discussed with me in my preferred language the importance of having their activities, services, programs, and processes explained to me by a trained interpreter in my preferred language so that I can understand my legal rights and fully and knowingly participate in all agency activities, services, programs and processes.

I acknowledge that this staff person or interpreter discussed with me in my preferred language, the risks of using family members or friends as interpreters and translators. These risks, as explained to me, include but are not limited to the following:

- Family members and friends may not have the bilingual language skills or technical vocabulary required to interpret or translate information completely and accurately concerning my rights or responsibilities pertaining to the agency's activities, services, programs or processes.
- Family members and friends may not feel bound to uphold the same standards of privacy, confidentiality, ethics, and linguistic accountability as a professional, trained interpreter or translator.
- Issues may arise concerning my private or confidential information pertinent to my participation in the activities, services, programs and processes offered by this agency that may be sensitive and/or difficult to discuss with me through a family member or friend.

However, I have freely, voluntarily, and knowingly decided to use a family member and/or friend as an interpreter and/or translator to discuss information pertinent to my participation in the activities, services, programs, and processes offered by this agency.

I understand that by using a family member and/or friend as interpreter and/or translator, the timeliness of service receipt may be delayed if she/he/they are not present when needed.

I understand that by using a family member and/or friend as an interpreter and/or translator, my private and confidential information will be disclosed to them, and I agree that this disclosure can be made.

I understand that at any time, I can change my mind and ask a staff member of this agency for the provision of a trained interpreter and/or translator.

Signature of client: _____ Date:

Name of staff person: _____

Signature of staff person: _____ Date:

Appendix E: LanguageLine Solutions offered languages list

LanguageLine Solutions®

LanguageLine Language List

Languages Available for Audio Interpreting

Acholi	Cebuano	Fukienese	Ibanag	Koho	Mizo	Quechua	Tajik
Afar	Chaldean	Fulani	Icelandic	**Korean***	Mnong	Quichua	Tamil
Afrikaans	Chamorro	Fuzhou	Igbo	Krahn	Mongolian	Q'eqchi'	Telugu
Akan	Chaochow	Ga	Ilocano	Krio	Montenegrin	Rade	Tetun
Akateko	Chin Falam	Gaddang	Indonesian	Kunama	Moroccan Arabic	Rakhine	**Thai***
Albanian*	Chin Hakha	Gaelic-Irish	Inuktitut	Kurmanji	Mortlockese	Rohingya	Tibetan
Amharic*	Chin Mara	Gaelic-Scottish	**Italian***	Kyrgyz	Napoletano	**Romanian***	Tigré
Anuak	Chin Matu	Garifuna	Jakartanese	**Laotian***	Navajo	Rundi	**Tigrigna***
Apache	Chin Senthang	Garre	Jamaican Patois	Latvian	**Nepali***	**Russian***	Toishanese
Arabic*	Chin Tedim	Gen	Japanese*	Liberian Pidgin English	Ngambay	Samoan	Tongan
Armenian*	Chipewyan	Georgian	**Japanese***	Lingala	Nigerian Pidgin	Sango	Tooro
Assyrian	Chuukese	Jarai				Seraiki	Trique
		German*	Javanese	**Lithuanian***	Norwegian	Serbian	**Turkish***
Azerbaijani	Cree	German Penn. Dutch	Jingpho	Luba-Kasai	Nuer	Shanghainese	Turkmen
Bahasa	Croatian		Jinyu	Luganda	Nupe	Shona	Tzotzil
Bahdini	Czech	Gheg	Juba Arabic	Luo	Nyanja	Sichuan Yi	**Ukrainian***
Bahnar	Danish	Gokana	Jula	Maay	Nyoro	Sicilian	Urdu
Bajuni	Dari	**Greek***	Kaba	Macedonian	Ojibway	Sinhala	Uyghur
Bambara	Dewoin	Guarani	Kam Muang	**Malay***	Oromo	Slovak	Uzbek
Bantu	Dinka	Gujarati	Kamba	Malayalam	Pampangan	Slovene	**Vietnamese***
Barese	Duala	Gulay	Kanjobal	Maltese	Papiamento	Soga	Visayan
Basque	Dutch	Gurani	Kannada	Mam	**Pashto***	**Somali***	Welsh
Bassa	Dzongkha	**Haitian Creole***	Kaba	Mandarin*	Plautdietsch	Soninke	Wenzhounese
Belarusian	Edo	Hakka China	**Karen***	**Mandarin***	Pohnpeian	Sorani	Wodaabe
Bemba	Ekegusii	Hakka Taiwan	Karenni	Mandinka	**Polish***	**Spanish***	Wolof
Benaadir	Estonian	Hassaniyya	Kashmiri	Maninka	**Portuguese***	Sudanese Arabic	Yemeni Arabic
Bengali*	Ewe	Hausa	Kazakh	Manobo	**Portuguese Brazilian***	Sunda	Yiddish
Berber	**Farsi***	Hawaiian	Kham	Marathi		Susu	Yoruba
Bosnian*	Fijian	**Hebrew***	Khana	Marka	**Portuguese Cape Verdean***	**Swahili***	Yunnanese
Bravanese	Fijian Hindi	Hiligaynon	**Khmer***	Marshallese	Pugliese	Swedish	Zapoteco
Bulgarian	Finnish	**Hindi***	K'iche'	Masalit	Pulaar	Sylhetti	Zarma
Burmese*	Flemish	Hindko	Kikuyu	Mbay		**Tagalog***	Zo
Cantonese*	**French***	**Hmong***	Kimiiru	Mien	**Punjabi***		Zyphe
Catalan	French Canadian*	Hunanese	Kinyarwanda	Mirpuri	Putian	Taiwanese	
		Hungarian	Kissi, Northern	Mixteco			

* Audio interpreting languages are available for LanguageLine® DirectResponse℠, our end-to-end language solution for inbound calls.

Languages of lesser diffusion may require additional interpreter connect time.
Lists are subject to change with interpreter availability. If you have a question regarding language availability, please contact your Account Executive or Customer Care.

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Languages Available for Video Interpreting

Albanian	Burmese	Italian	**Polish***	Tigrigna
American Sign Language*	**Cantonese***	Japanese	**Portuguese***	Turkish
Amharic	Farsi	Karen	Punjabi	Ukranian
Arabic*	**French***	Khmer	Romanian	Urdu
Armenian	German	**Korean***	**Russian***	**Vietnamese***
Bengali**	Greek	Laotian	**Somali****	
Bosnian	Haitian Creole	Lithuanian	**Spanish***	* Available 24/7
British Sign Language	Hebrew	Malay	Swahili	** Extended weekend hours
	Hindi	**Mandarin***	Tagalog	
	Hmong	Nepali	Thai	

For information on audio and video interpretation: 1-800-752-6096

Translation and Localization Top Requested Languages
More than 298 unique languages and 480 language pairs are available.

• Afrikaans	• Chuukese	• Hindi	• Malayalam	• Somali
• Albanian	• Croatian	• Hmong	• Mandinka	• Spanish (Iberian)
• Amharic	• Czech	• Hungarian	• Marathi	• Spanish (Latin)
• Arabic	• Danish	• Icelandic	• Navajo	• Swedish
• Bahasa	• Dutch	• Indonesian	• Norwegian	• Tagalog
• Bengali	• Estonian	• Italian	• Oromo	• Tamil
• Bosnian	• Farsi	• Japanese	• Polish	• Telegu
• Bulgarian	• Finnish	• Karen	• Portuguese (Brazil)	• Thai
• Burmese	• French (Canadian)	• Kazakh	• Portuguese (Euro)	• Turkish
• Cape Verdean Creole	• French (Euro)	• Khmer	• Punjabi	• Ukrainian
• Catalan	• Georgian	• Korean	• Romanian	• Urdu
• Chinese (Simplified)	• German	• Laotian	• Russian	• Vietnamese
• Chinese (Trad–HK)	• Greek	• Latvian	• Serbian	• Yiddish
• Chinese (Traditional)	• Gujarati	• Lithuanian	• Sinhalese	• Zulu
	• Haitian Creole	• Macedonian	• Slovak	
	• Hebrew	• Malay	• Slovenian	

Additional languages and dialects may be available. If you have a question regarding language availability, please call 1-800-878-8523 or contact us at translation@languageline.com.

Appendix F: Additional Resources

1. ADA Requirements Effective Communication - https://www.ada.gov/resources/effective-communication/

2. Executive Order 13166 - https://www.justice.gov/crt/executive-order-13166

3. Final Guidance to Federal Financial Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons - https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf

4. LEP.gov - https://www.lep.gov/

5. LanguageLine Client Support Center Resources - https://www.languageline.com/client-support-center