

Metropolitan Government of
Nashville and Davidson County

2025
Title VI

Compliance
Implementation
Report

Mayor Freddie O'Connell

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** Detailed EEO reports for General Government are available upon request.

INTRODUCTION

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

THE OFFICE OF THE MAYOR

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

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

OFFICES AND RESPONSIBILITIES

Executive Office

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

Office of Performance Management

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

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

Office of Communications

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

Office of Neighborhoods and Community Engagement

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

Office of New Americans

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

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

Office of Constituent Services

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

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

Office of Sustainability and Resilience

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

Office of Legislative Affairs

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

Office of Film and Special Events

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

Office of Economic and Community Development

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

THE METROPOLITAN COUNCIL

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

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

Meetings on the first Tuesday of every month except June (which is reserved for budget public hearings) are reserved for public hearings on bills on zoning matters. The Vice-Mayor presides over these meetings. Agendas of the Council meetings and minutes of prior meetings are prepared by the Metropolitan Clerk's Office. Appendix C provides a listing of Metropolitan Council members for the 2023-20237 term.

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

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

Codes Administration

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

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

Criminal Justice Planning Unit

The goal of the Criminal Justice Planning Unit is to assist policy makers in better planning for the expected population of correctional facilities, intermediate sanctions, and other criminal justice services and programs. The CJPU's main focus is to forecast inmate populations under correctional supervision by the use of computer modeling. The CJPU currently presents a semiannual report which predicts and assesses the ten-year correctional inmate population for Davidson County. Starting with the 2004 semiannual report, the CJPU will provide five-year correctional population projections. Additionally, the unit is available to provide accurate data and credible analysis to policy makers when making decisions for the Davidson County Justice System.

Emergency Communications

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

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

Finance

The Finance Department is charged with administering the financial affairs of the Metropolitan Government in accordance with applicable provisions of the Charter, applicable ordinances, and principles and practices of sound municipal fiscal administration.

The mission of the Department of Finance is to provide financial management, information, and business products to policy makers, departments, agencies, investors, and the Nashville community so they can have confidence in Metro Government, make informed decisions, and achieve their results.

Fire

The Fire Department is charged with providing class 6 to 9 level of fire protection services and a strong first responder emergency medical service to all residents of the General Services District outside the Urban Services District; to provide class 3 level of fire coverage and first responder emergency medical service to residents of the USD through the following programs: suppression, rescue, communications, training, safety, maintenance and repair, and prevention and required administrative activities; and to provide the highest possible level and quality of emergency medical care and rescue services to the residents of Metropolitan Nashville/Davidson County.

General Services

The General Services Department serves all of the other departments in Metro Nashville Davidson County Government through a system of support services including building maintenance and operation, radio communications, motor pool services, security services, postal services, photographic services and printing services.

The mission of the General Services Department is to provide radio communications, facilities maintenance and operations, photographic, postal, printing, and security products to Metropolitan Government Departments so they can provide the highest level of service to their customers and citizens.

Human Resources

The Department of Human Resources provides information and support in the areas of hiring, training, compensation, benefits, employee experience, and compliance with all local, state and Federal laws, rules and regulations for active and retired Metropolitan Government employees. Our goal is to provide opportunities that promote the professional development of employees in a diverse municipal workforce.

The mission of the Human Resources Department is to provide human resources business and benefits products to employees and agencies so they can provide quality government services and to retirees so they can receive the benefits to which they are entitled. Both the Metropolitan Employees Benefit Board and the Civil Service Commission are housed in the Department of Human Resources.

Information Technology Services

Information Technology Services Department's Mission Statement:

Work together to deliver exceptional technology solutions that improve the lives of the citizens of Davidson County through the Metropolitan Government entities we serve.

Law

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

Police

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

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

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

Nashville Department of Transportation and Multimodal Infrastructure

The mission of the Department of Public Works is to deliver a wide range of services that help define the quality of life for Nashville and Davidson County's residents, businesses and visitors by ensuring a safe and convenient complete streets transportation infrastructure; protecting the environment; and creating cleaner, beautiful, and more livable neighborhoods.

Water Services

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

SEMI-AUTONOMOUS AGENCIES, BOARDS, AND COMMISSIONS

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

Agricultural Extension

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

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

Arts Commission

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

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

Auditorium Commission

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

Beer Permit Board

The Beer Board regulates the transportation, storage, sale, distribution, and possession of alcoholic beverages that have less than five percent alcohol by weight. The board is additionally responsible for the issuance of permits to operate dance halls. The board consists of seven members appointed by the Mayor and approved by the Metropolitan Council. Members serve a four-year term. Six board staff members are responsible for issuing permits and monitoring and inspecting permitted establishments for compliance with the beer and public dance laws. The board and staff work in conjunction with the Police, Health, Zoning, and Fire Marshall's offices.

Community Review Board

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

The CRB staff, Metro Nashville Community Oversight (MNCO), is managed by the Executive Director. The Executive Director and staff handle all administrative, fiscal, legal and program areas of the Board.

Convention Center Authority

The mission of the Music City Center is to create significant economic benefits for the citizens of the greater Nashville region by attracting local and national events while focusing on community inclusion, sustainability and exceptional customer service delivered by our talented team members.

Election Commission

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

Farmer's Market Board

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

Historical Commission

The Historical Commission seeks to preserve, protect, and document the history, historic places, buildings, and neighborhoods of Davidson County through education, technical assistance, and advocacy. The Historic Zoning Program provides technical/design assistance to property owners within historic zoning areas and works with neighborhoods seeking stabilization and revitalization. They are also responsible for issuing preservation permits and regulatory historic zoning properties.

Human Relations

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

Justice Integration Systems Policy Committee

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

Library Board

The Library Board seeks to collect and make accessible to the public, printed, electronic, audiovisual, non-print, and broadcast information materials to facilitate the informal self-education of all persons, including the disabled; to enrich and further develop the knowledge of persons undertaking formal education; to encourage recreational reading and constructive use of leisure time; to support the cause of literacy; and to meet the day-to-day informational needs of all persons in the community.

Twenty branch libraries throughout Davidson County provide a full range of library service in local or regional settings. Functions include reference service, children's service, reader's advisory assistance and public programming. Each branch maintains a book collection offering a full range of nonfiction, popular reading, and study materials for all ages. Many provide books-on-tape as well as popular videos. Most branches also furnish copy machines, tax forms, and limited access to the Volunteer Income Tax Assistance Program (VITA) during tax season, Free Application for Federal Student Aid (FAFSA) forms, and magnet school applications. Online catalog terminals and public PCs, available at every location, provide access to the system wide collection and the Internet.

Metro Action Commission

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

Parks and Recreation

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

Planning Commission

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

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

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

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

Social Services

The Metropolitan Social Services Department's primary purpose is to respond to persons in need of assistance, opportunities and information when challenged by economic, social or behavioral problems. In delivering these services, Metropolitan Social Services will respect the dignity of people in need and support their unique ability to grow, change and succeed through personal choices. Metropolitan Social Services staff works in conjunction with other agencies to develop professional, comprehensive and effective responses to individual and community challenges and to build understanding and support by the public. Metropolitan Social Services will provide research and analysis of social problems within the county to other branches and departments of Metropolitan Government as needed.

OTHER ELECTED OFFICIALS

Assessor of Property

The mission of the Assessor of Property is to appraise real property at its market value, and business tangible personal property under schedules provided by law; to classify property correctly under the law; to apply property assessment in accordance with each parcel's proper classification; to maintain accurate public records; to reappraise every real parcel at least every four years and to reappraise all business tangible personal property annually; to provide property owners easy access to appeal rights; to generate annually an assessment roll for the purpose of property taxation by the Metropolitan Council.

Board of Education

The purpose of the Metro Board of Education is to do whatever it takes for all students to acquire the knowledge and skills to become productive, responsible citizens. The vision is to be the top- performing school district in the nation.

Circuit Court Clerk

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

Clerk and Master

The Clerk and Master serves the four elected chancellors, performs judicial duties pursuant to state law and the Metro Charter, conducts hearings as judicial officer, writes reports of findings to the chancellors upon referred cases, and oversees a staff of 19 clerks.

The Clerk and Master administers the caseload for the four chancellors, including maintenance of books, records and case files; collecting and reporting substantial revenue from delinquent taxes and court costs; issuing process and investing funds held as trustee as an arm of the Chancery Court; and providing public records and information to citizens.

County Clerk

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

Criminal Court Clerk

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

District Attorney General

By authority granted in TCA § 8-7-10, the District Attorney General serves to investigate and prosecute all criminal offenses that occur within Davidson County where there is sufficient evidence to warrant conviction. All prosecutions are designed to punish offenders, incapacitate violent and repeat criminals, and generally to deter future criminal activity. Additionally, the office is committed to treating victims and witnesses with dignity.

General Sessions Court Judges

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

The Court Judges of the Metropolitan General Sessions Court of Nashville-Davidson County is a high volume, limited jurisdiction Court that was first established in 1937. It has grown to an eleven division Court that handles civil cases with monetary limits not greater than \$15,000. The criminal case jurisdiction covers preliminary hearings in felony cases and misdemeanor trials in which the defendant waives the right to a jury. Since it is not a “court of record,” its decisions are subject to appeal. Since 1971, this Court has been authorized under the Metropolitan Charter to handle Metropolitan ordinance violations involving traffic, environmental, and other county ordinance violations. General Sessions judges are elected to an eight-year term.

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

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

Juvenile Court

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

Juvenile Court Clerk

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

Public Defender

The Metropolitan Public Defender's Office operates under the authority of the Metropolitan Charter, Title II, Section 2-16-010, which states as follows: The public defender shall render legal aid and defend only those indigent defendants who are in jail, charged with the commission of a crime and are unable to make bond, or such other defendants as a court with criminal jurisdiction shall determine to be indigent. In addition, the public defender shall provide guardian *ad litem* services when such services are deemed required by the Davidson County juvenile court for children who are the subject of proceedings in such court and the Metropolitan Government would be required by law to pay reasonable compensation for such services if not provided by the public defender. The Public Defender's Office is staffed with 42 licensed attorneys who represent indigent clients on charges ranging from public drunkenness to first degree murder.

Register of Deeds

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

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

Sheriff

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

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

State Trial Courts

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

Trustee

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

PROGRAM COVERAGE

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

Federal Funding in Metro

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

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

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

RESOURCES COMMITTED TO TITLE VI COMPLIANCE

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

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

TITLE VI PROCEDURES

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

COMMUNICATION

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

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

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Agricultural Extension Year: 2025

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

Form Completion Date: 6/9/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No through UTK, not MHRC

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

☒ Yes ☐ No

If so, how is the training provided?

UT System asynchronous on-demand module

☐ Not Provided

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

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

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

☒ Yes ☐ No UTK not MHRC

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

Training plus Office of Equal Opportunity & Accessibility <https://dae.utk.edu/eoa/title-vi-plans/>

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

[illegible]

Monitoring Subrecipients

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

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

☒ Yes

☐ No

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

Specific to program.

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes

☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☒ Yes

☐ No

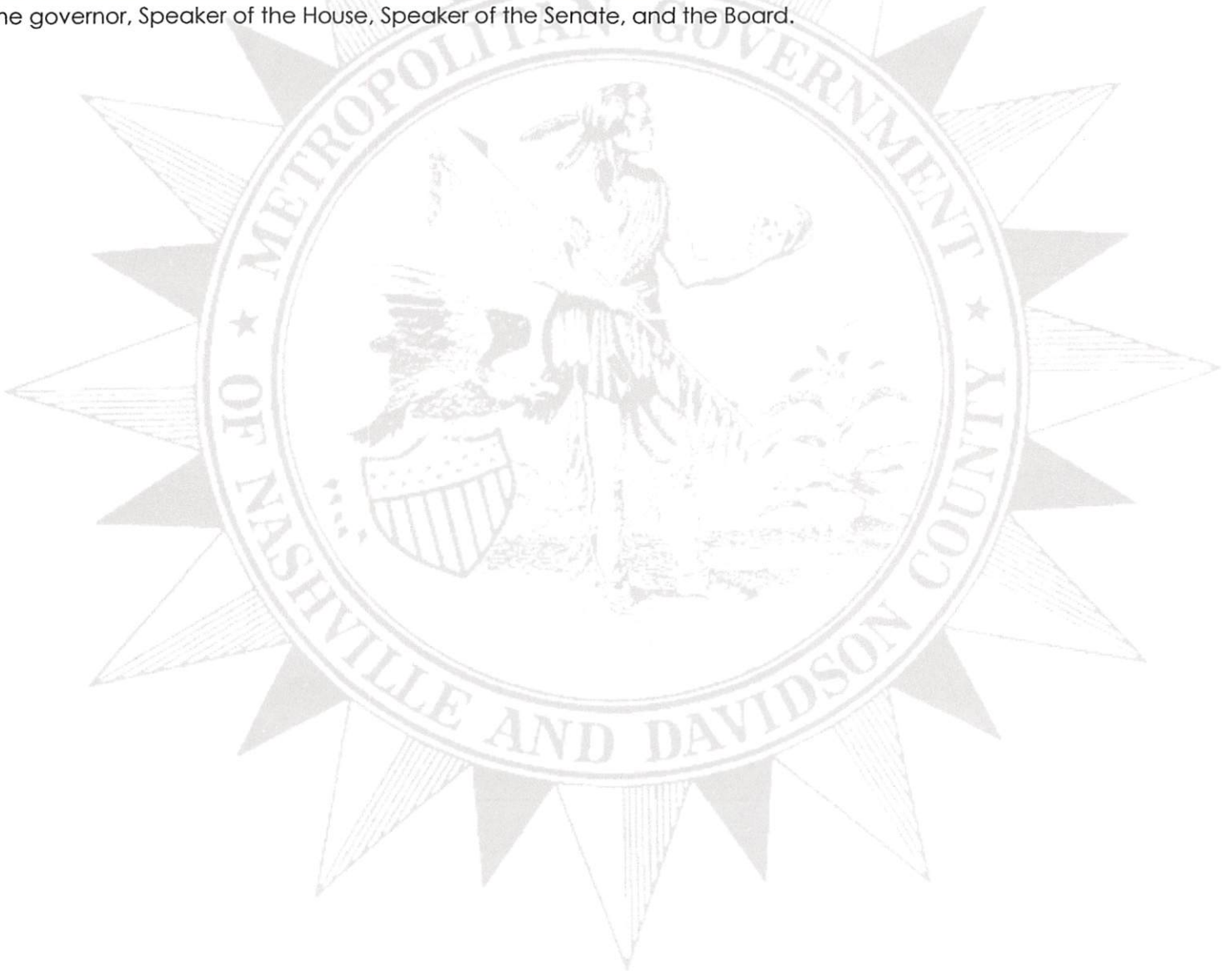
If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
John Compton	White
Brad Box	White
Bill Haslam	White
Charles Hatcher	White
Decosta Jenkins	Black or African American
Shanea McKinney	Black or African American

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

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

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Arts Commission Year: 2025

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

Form Completion Date: 5/27/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Training videos

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

All staff must take the Title VI training, and MHRC Language plan/resource is distributed to staff via email.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Title VI poster in Metro Arts' office, on the Grants/Funding Guidelines, and also on every Grant contract as well.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

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

☐ Yes ☒ No

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

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

☒ Yes ☐ No

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

☒ Posted Signs ☒ Website
☒ Other We direct people to make complaints directly to MHRC in our finding guidelines.

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

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes ☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☒ Yes ☐ No

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

Name	Race
Teree McCormick	Black or African American
Ellen Gilbert	American Indian
Fathiyah Shepard-Suso	Black or African American
Lydia Yousief	Two or More Races
Camille Greer	Black or African American
Stacey Irvin	White
Sara Lee Burd	Hispanic or Latino
Dr. Cara Robinson	White

Carlton Wilkinson	Black or African American
Shawn Giles	Black or African American
Campbell West	White
Tre Hardin	Black or African American
Heather Lefkowitz	White
Evan Brown	Black or African American
Brittany Cole	Black or African American
Timothy Jester	White
Shawn Knight	White
Janet Kurtz	White
Dawana Wade	Black or African American
Mayra Yu	Two or More Races
Jilah Kalil	White

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

We have a governing document for equity practices: <https://www.metroartsnashville.com/equity>. We solicit participation in these committees through stakeholders, community members, Council Members and Commission members. Community members may also nominate themselves or others for committees and community panels.

<https://www.metroartsnashville.com/opportunities>

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Assessor of Property Year: 2025

Title VI Coordinator: _____ Form Completed By: Cristi Scott

Form Completion Date: 6/24/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

It is discussed in new employee orientation

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☐ No We have not had any complaints

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

☐ Posted Signs ☐ Website☐ Other

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

☐ Yes ☒ No

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

☐ Yes ☐ No We have not had any complaints

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

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

[illegible]

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

N/A



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Beer Board Year: 2025

Title VI Coordinator: Terrence Darby Sr. Form Completed By: Douglas James

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Title VI information is provided during the hiring process and during team meetings, as necessary.

☐ Not Provided

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

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

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

☐ Yes ☒ No

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

We discuss discrimination and inclusion during team meetings, as necessary.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

The Statement of Non-Discrimination, as well as other Title VI information, can be found on our website, which is available to the public. We also have it publicly displayed in our building.

Do you provide this in languages other than English?

☐ Yes ☒ No

***Presently we do not but are actively seeking vendors to provide this information, as well as our laws and rules, in various languages for the publics use.**

Title VI Complaint Procedure

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

☒ Yes ☐ No

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

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

☐ Yes ☐ No

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

☒ Posted Signs ☒ Website

☒ Other

We will also provide the information verbally, if requested by a member of the public contacting our office by phone.

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

☐ Yes ☒ No

***Presently we do not but are actively seeking vendors to provide this information, as well as our laws and rules, in various languages for the publics use.**

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

We have not received any Title VI complaints.

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

No I’m not aware of any additional federal financial assistance distribution to a subrecipient.

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

Our department plan is to maintain laws, rules and regulations in various languages. We also plan to contract with a vendor to provide interpretation as necessary, per the Metro Nashville Language Access Guide & Toolkit.

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

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

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

N/A

TITLE VI OF THE 1964 CIVIL RIGHTS ACT



The Law

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Applicability

Title VI covers all agencies receiving federal funds. Some examples include: student aid; employee training; grants; loans; property; loans of personnel; tax incentives; and technical assistance. Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or by a third party, within 90 days from the date of the alleged discriminatory act. Complaints should be directed to Metro Human Relations Commission, 150 2nd Ave N, Suite 217, Nashville, TN 37201, phone number **(615) 880-3370**.

It shall be against the policy of the Metropolitan Government to discriminate against an individual based upon that person's race, color or national origin.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Circuit Court Clerk Year: 2025

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

Form Completion Date: 5/19/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

We have information regarding Title VI located in our Circuit Court Clerk Employee Manual. Please see attached (pages 23 & 27). This is discussed during orientation. We are not aware of any annual training previously held. We will, however, utilize all of the materials provided by the HR Department of the Metropolitan Government of Nashville, Davidson County to train our new employees on this policy.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

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

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

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

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

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

☒ Yes ☐ No

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

See Attached. (pages 33 & 34)

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

☐ Yes ☐ No

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

☐ Posted Signs ☒ Website

☐ Other

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

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

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

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

EQUAL OPPORTUNITY EMPLOYER

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

EQUAL EMPLOYMENT OPPORTUNITY

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

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

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

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

NEPOTISM

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

DRUG-FREE WORKPLACE

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

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

AMENDMENT OF RULES

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

DISCRIMINATION

THE LAW

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

FEDERAL LAWS AND REGULATIONS

- 1) CIVIL RIGHTS ACT OF 1964, Title VI, provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
- 2) CIVIL RIGHTS ACT OF 1964, Title VII, makes it unlawful for an employer to discriminate as to hiring, firing, promotion, compensation, terms, conditions or privileges of employment on the basis of race, color, religion, gender or national origin. It also forbids employers to limit, segregate or classify employees in any way that tends to deprive any individual of employment opportunities or adversely affect his or her employment status because of race, color, religion, gender or national origin. This also applies to people in apprenticeship, training and retraining programs. It is also illegal to indicate a preference in advertisements relating to employment.

MAJOR AMENDMENTS

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

INCIDENT/COMPLAINT PROCEDURE

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

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

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

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

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

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

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

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

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

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

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

RIGHT OF APPEAL

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

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

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

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Clerk and Master's Office Year: 2025

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

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

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

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

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

If so, how is the training provided?

☒ Not Provided - Department does **NOT** directly receive Federal financial assistance.

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

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

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

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

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

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

Notice to Beneficiaries of Protection under Title VI

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

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

List all locations where the notice is posted:

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

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

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

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

☐ Posted Signs ☐ Website

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

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

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

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

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

[illegible]

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

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

Language Access to Persons who are limited English Proficient

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

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

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

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

[illegible]

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

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Codes Administration Year: 2025

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

Form Completion Date: 5/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Through Metro's new hire orientation process

☐ Not Provided

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

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

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

☐ Yes ☒ No (Scheduled for 5/21/25)

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

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

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

On the department's website

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☐ Posted Signs ☒ Website

☒ Other Referring any complaints to Metro Human Relations

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes☒ No

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

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

The Codes Department utilizes translation services through the Tennessee Language Center.

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes☒ No

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

[illegible]

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

N/A



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Community Review Board Year: 2025

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

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☐ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

On SharePoint and during New Employee Onboarding

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

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

☒ Yes ☐ No☐ Posted Signs ☐ Website

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes ☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☒ Yes ☐ No

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

Name	Race
Walter Holloway	Black or African American
Joe Brown	White
Walter Searcy	Black or African American
Heather Michelle	White
Shawn Whitsell	Black or African American
Alisha Haddock	Black or African American
Mark Wynn	White
	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Convention Center Authority Year: 2024

Title VI Coordinator: Robert Rice Form Completed By: Robert Rice

Form Completion Date: 5/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

In Person - Orientation

☐ Not Provided

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

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

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

☐ Yes ☒ No

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

In Orientation

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

☐ Posted Signs ☐ Website

☒ We do not post this to the public.

☐ Yes ☒ No

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

☒ Yes ☐ No

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes☒ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes☒ No

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

[illegible]

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: County Clerk Year: 2025

Title VI Coordinator: N/A Form Completed By: Brenda Wynn

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☐ Yes ☐ No **N/A**

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

☐ Yes ☐ No **N/A**

If so, how is the training provided?

N/A

☐ Not Provided

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

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

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

☐ Yes ☐ No **N/A**

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

N/A

☐ We Do Not **N/A**

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☐ No **N/A**

List all locations where the notice is posted:

N/A

Do you provide this in languages other than English?

☐ Yes ☐ No **N/A**

Title VI Complaint Procedure

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

☐ Yes ☐ No **N/A**

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

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

☐ Yes ☐ No **N/A**

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

☐ Posted Signs ☐ Website

☐ Other **N/A**

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

☐ Yes ☐ No **N/A**

Record of Title VI Complaints, Investigations and Lawsuits

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

☐ Yes ☐ No **N/A**

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

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

Date	Status	Action Taken	Summary
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
N/A	Select a Status	Select an Action	
Select N/A a Date	Select a Status	Select an Action	

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

☐ Yes ☐ No **N/A**

Language Access to Persons who are limited English Proficient

☐ Yes ☐ No **N/A**

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

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

☐ Yes ☐ No **N/A**[illegible]

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

N/A



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Criminal Court Clerk Year: 2025

Title VI Coordinator: Amy Rooker Form Completed By: Amy Rooker

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Title VI /VII information is documented in the employee handbook. New employees must read the handbook and sign an acknowledgment. Employees are required to complete Diversity and Inclusion training per Metro guidelines which covers the Civil Rights Act of 1964, the seven protected classes, bias, and inclusion. Additionally, all employees are required to take Title VI training annually and sign an acknowledgement. The training material is found on the Metro Nashville Human Relations Commission website on Nashville.gov.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Title VI information is documented in the employee handbook. It is posted in the employee break room, and in the public lobby in English, Spanish, Arabic, and Chinese. Employees receive electronic Title VI information annually to review that originates from the Metro Human Relations Commission.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Criminal Court Clerk’s main lobby in A.A. Birch Courthouse (English, Spanish, Arabic, and Chinese) Also, it is posted in the CCC employee break room.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

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

☐ Yes ☒ No

While there is no written policy for investigating Title VI specifically, we do have a Discrimination Policy that covers Title VII. Complaints received will be thoroughly investigated and will generally follow the Employee Grievance Policy 5.10 procedures. Assistance from the Human Relations Commission would be requested if needed. Our Discrimination Policy is attached.

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

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

☐ Yes ☒ No

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

☒ Posted Signs ☐ Website

☐ Other

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

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

The Office of the Criminal Court Clerk utilizes interpreters who work with the General Sessions Court. For in-person and phone customer assistance, this office has requested FY26 funding to contract with a language line provider.

Minority Representation on Planning or Advisory Bodies

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

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

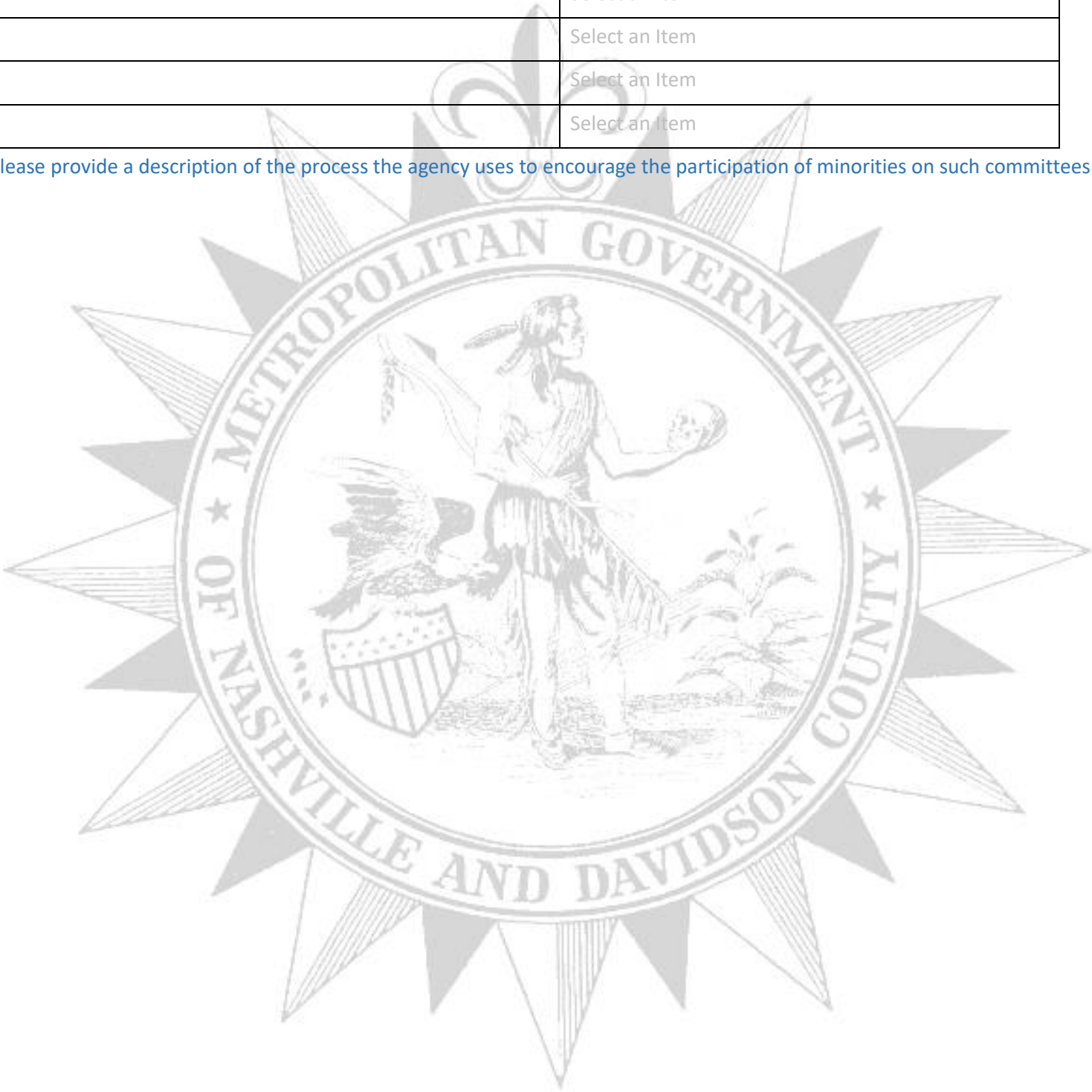
☐ Yes ☒ No

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

Name	Race
	Select an Item

	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

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



CCC Written Policies

2.3 EQUAL EMPLOYMENT OPPORTUNITY

Feb 25, 2013, Current

A. Policy

It is the policy of the Criminal Court Clerk that all persons shall have equal employment opportunities regardless of race, color, national origin, gender, age, religion, or disability, gender identity, or sexual orientation. Illegal discrimination against any person in recruitment, examination, appointment, training, promotion, retention, discipline or any other employment practices shall be prohibited. Harassment based on race, gender, color, religion, age, national origin or disability is a form of discrimination and will not be condoned.

The Criminal Court Clerk guidelines and policies shall be administered in such manner as to comply fully with all Equal Employment Opportunity laws and regulations.

B. Complaint Procedure

A complaint of discrimination as outlined in the Guidelines on Discrimination, including a complaint of sexual harassment, may be filed according to the steps defined below. A complaint should be filed within a reasonable time frame of the occurrence or reasonable knowledge of alleged harassment and/or discrimination incident(s). If it is a continuing problem, the complainant needs to state when it began and the progression to the time of the complaint. A complaint may be filed by a current or former employee or by an applicant and by an individual or a group of people. Complainants shall have the right to have reasonable representation of their choosing with them at all stages of the complaint procedure. The complaint procedure will maintain confidentiality to the degree allowed both by law and by the need to conduct a thorough investigation. Reprisal or retaliation against good faith complainants or witnesses participating in the investigation is prohibited and could be grounds for disciplinary action. An employee who witnesses or otherwise has knowledge of discrimination is encouraged to report the incident to a supervisor or an appropriate authority.

Although employees are encouraged to try to settle problems on an informal basis, employees who feel they have been subjected to discrimination may submit a complaint to their supervisor and or designee. When appropriate, the supervisor shall try, in a timely manner, to remedy any actual or perceived problem without the necessity of additional formal procedures. After reviewing the matter, the supervisor shall promptly inform the employee of his decision. If the complaint cannot or should not be resolved at this level, the employee may submit the complaint to the Criminal Court Clerk or his designee. The Criminal Court Clerk or designee, after a prompt and thorough investigation, will take the necessary steps to correct any problem found to exist, including disciplinary action. The Criminal Court Clerk or designee shall notify the complaining party of his decision following the conclusion of the investigation.

2.4 GUIDELINES ON DISCRIMINATION

Feb 25, 2013, Current

Administrators and supervisors in the Criminal Court Clerk Office are familiar with and will comply with all laws, regulations and guidelines governing various forms of discrimination. Specific guidelines are summarized in this document in Appendix V. Furthermore, harassment of any person in the form of verbal or physical conduct based on a person's race, gender, color, religion, national origin or disability, creed, gender identity, or sexual orientation will not be condoned when such conduct:

1. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
2. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. Otherwise adversely affects an individual's opportunities associated with employment.

A5 APPENDIX V

Feb 25, 2013, Current

GUIDELINES ON DISCRIMINATION – Title VI and VII

Administrators and supervisors in the Metropolitan Government are familiar with and will comply with all laws, regulations and guidelines governing various forms of discrimination. Specific guidelines are summarized in this document. Furthermore, harassment of any person in the form of verbal or physical conduct based on a person's race, gender, color, religion, national origin or disability, creed, gender identity, or sexual orientation will not be condoned when such conduct:

1. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
2. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. Otherwise adversely affects an individual's opportunities associated with employment.

A. Race Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

It shall be against the policy of the Metropolitan Government to discriminate against an individual as a result of that person's race. This policy applies to applicants for employment as well as current employees.

B. Sexual Discrimination

It is the policy of the Metropolitan Government that there shall be no discrimination against any individual based on gender. This covers all employment actions and conditions of employment and benefits.

1, Job Policies and Practices (Civil Rights Acts of 1964, Title VII, as amended by the Civil Rights Act of 1991 & Equal Pay Act of 1963)

- a. Personnel policies do not discriminate on the basis of gender.
- b. Employees and applicants of both genders are equally considered for any positions for which they are qualified.
- c. Employment opportunities, wages, hours, conditions of employment and benefits are equally offered to all employees regardless of gender.
- d. Marital status shall not be a factor in any employment opportunity or decision.
- e. Appropriate physical facilities shall be provided for people of both genders.

2. Maternity Leave (Pregnancy Act of 1978 & Tennessee Maternity Leave Law)

Accrued sick leave shall be granted for the time that a woman is physically unable to work due to childbirth as documented by her physician. Additional vacation and/or leave without pay may be granted in accordance with applicable law. The same vacation and/or leave without pay may be granted as paternity or adoption leave.

3. Sexual Harassment (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991; Guidelines on Discrimination Because of Sex, 1980) The Metropolitan Government prohibits sexual harassment of any employee. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

- a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or
- b. Submission to or rejection of such conduct is used as the basis for employment decisions affecting such individual, or
- c. Such conduct has the purpose of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment can take many forms. It is not limited to overt physical acts. Suggestive comments, jokes of a sexual nature, sexually suggestive objects or pictures, obscene gestures, sexually graphic stories, as well as unwanted touching, may all constitute sexual harassment.

Sexual harassment of any employee will not be tolerated. No employee will be allowed to sexually harass, either verbally or physically, another employee; nor shall any supervisor allow the harassment of any of his/her employees, either by other employees or by persons not employed by Metro Government. It will be the responsibility of managers and supervisors to take all steps necessary to enforce the provisions of this policy. Any complaint of harassment will be promptly investigated and corrective and/or disciplinary action taken if the charges are found to be true.

Action can only be taken when managers and supervisors have knowledge of sexually harassing conduct. Employees have a duty to inform managers and supervisors when they observe or are aware of improper sexual conduct exhibited by a Metropolitan Government employee. This obligation to inform includes improper conduct committed by non-government employees if the conduct is directed toward government employees.

C. Religious Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

The Metropolitan Government expresses its commitment to prohibit religious discrimination against applicants for employment and employees in all areas of employment and benefits. No distinction based on religion shall apply in employment opportunities, wages, hours of work, and other conditions of employment or benefits. Efforts will be made to accommodate the religious observance and practices of an employee unless such accommodation is unreasonable and would result in an undue hardship on the conduct of business.

D. Age Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991 & Age Discrimination in Employment Act of 1967, as amended)

The policy of the Metropolitan Government prohibits age-based discrimination against

individuals 40 years of age or older. The Criminal Court Clerk will not refuse to hire, to discharge, or otherwise discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment because of an individual's age.

Exceptions:

1. There may be differentials in bona fide employee benefit plans.
2. For some areas of work, age may be a bona fide occupational qualification.

E. National Origin Discrimination (Civil Rights Act of 1964, Title VII, as amended by the Civil Rights Act of 1991)

1. Policy

It shall be against the policy of the Metropolitan Government to discriminate because of an individual's or his or her ancestor's place of origin or because an individual has the physical, cultural or linguistic characteristics of a national origin group. Furthermore, it is against the policy to discriminate for reasons which are grounded in national origin, such as (a) marriage or association with persons of a national origin group; (b) membership in, or association with an organization identified with or seeking to promote the interests of national origin groups; (c) attendance or participation in schools, churches, temples or mosques, generally used by persons of a national origin group; and (d) because an individual's name or spouse's name is associated with a national origin group. There shall be no discrimination based on national origin in any area of employment or condition of employment or in the granting of employment benefits.

2. Citizenship

The Criminal Court Clerk requires all employees be United States citizens, legal resident aliens, or aliens authorized to work in the United States. Specified classifications require U.S. citizenship as a bona fide occupational qualification.

F. Disability Discrimination (State and Local Fiscal Assistance Act of 1972 and Rehabilitation Act of 1973: Americans with Disabilities Act of 1990)

1. Policy

It is the policy of the Metropolitan Government to assure equal employment opportunity to disabled persons on the basis of qualifications and ability to perform the job. There shall be no discrimination in terms of employment opportunities, wages, hours of work or other conditions of employment or benefits. An individual with a disability is one who has a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or who is regarded as having such an impairment.

2. Application Process

Disabled persons are guaranteed the same application process as other applicants. Assistance may be provided when needed, such as the following:

- a. A reader may be provided for completing an application or written examination for qualified applicants who are vision-impaired or illiterate due to a learning disability.
- b. Waiver of a driver's license may be requested for qualified disabled applicants who are not allowed to drive.

3. Reasonable Accommodation

A department shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled individual unless to do so would be an undue hardship. The specific accommodations needed shall be determined jointly by the individual and the Criminal Court Clerk with technical assistance provided by the Department of Human Resources for Metro. Reasonable accommodation may include but shall not be limited to:

- a. Making facilities readily accessible to and usable by disabled persons
- b. Job restructuring, job sharing or modified work schedule, acquisition or modification of equipment or devices and other similar actions.
- c. Assignment to a vacant position for which the person is otherwise qualified

In determining whether an accommodation would impose an undue hardship on the operation.

5.10 EMPLOYEE GRIEVANCES

Feb 25, 2013 Current

A grievance is defined as an employee's claim that he has been adversely affected by a violation, misinterpretation, misapplication or non-application of a specific law, ordinance, resolution, executive order, or written policy.

Every employee shall have the right to present his grievance under the provisions of the grievance procedures free from fear, interference, restraint, discrimination, coercion or reprisal.

A. NON-GRIEVABLE MATTERS

While the grievance procedure can be beneficial to an organization, there are boundaries that must be set concerning issues that are not a grievance. These boundaries are set in order to maintain the efficient operation of the Criminal Court Clerk and to prevent the obstruction of its goals and objectives.

The list found below outlines subject areas that are not considered to be a grievance circumstance:

- o Changes or request for changes in the approved pay plan or approved benefits.
- o The merits of any uniformly applied HR practice, policy or procedure established by laws, or ordinance.
- o Reductions in work force.
- o Management rights to schedule and organize work, to make work assignments, and to prescribe methods and procedures by which work is performed, unless otherwise provided in these rules.

Complaints alleging discrimination or other violations of applicable EEO laws must be filed as discrimination complaints and will be processed in accordance with the EEO Complaint Procedure.

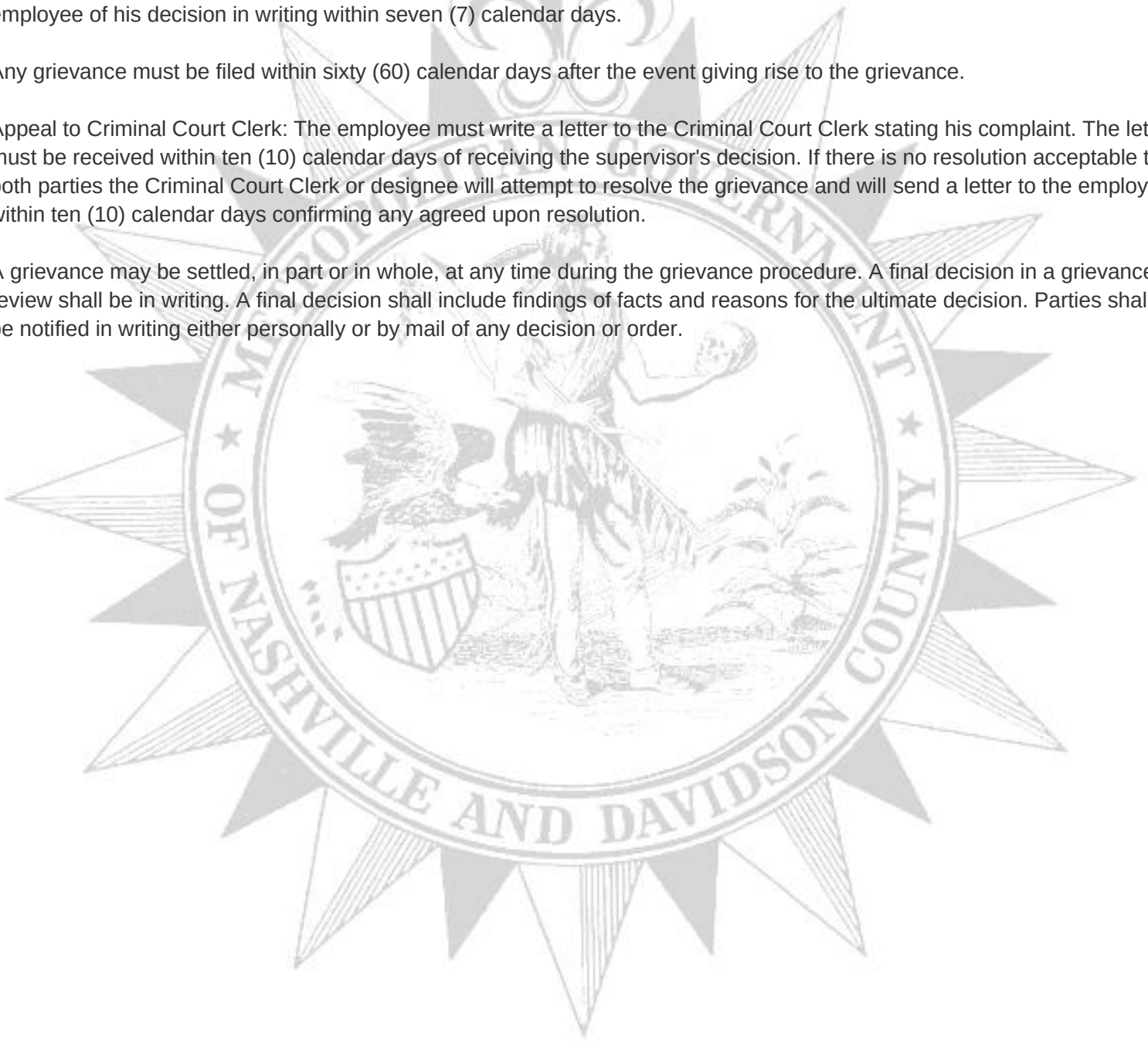
B. GRIEVANCE PROCEDURE

Written Complaint to Supervisor: The first stage of any grievance consists of the employee's written presentation of his complaint to his immediate supervisor. The supervisor will document the grievance and have the employee sign a simple statement that he is submitting a grievance. The employee may take his complaint to the next supervisor in the chain of command when the complaint concerns some action of the supervisor that the employee feels he is not able to discuss with the supervisor. The supervisor will promptly consider the complaint and determine if the matter is grievable. The supervisor will take the appropriate action to resolve the grievance or to deny the grievance. He shall take action and/or notify the employee of his decision in writing within seven (7) calendar days.

Any grievance must be filed within sixty (60) calendar days after the event giving rise to the grievance.

Appeal to Criminal Court Clerk: The employee must write a letter to the Criminal Court Clerk stating his complaint. The letter must be received within ten (10) calendar days of receiving the supervisor's decision. If there is no resolution acceptable to both parties the Criminal Court Clerk or designee will attempt to resolve the grievance and will send a letter to the employee within ten (10) calendar days confirming any agreed upon resolution.

A grievance may be settled, in part or in whole, at any time during the grievance procedure. A final decision in a grievance review shall be in writing. A final decision shall include findings of facts and reasons for the ultimate decision. Parties shall be notified in writing either personally or by mail of any decision or order.



Title VI training found on Nashville.gov

<https://filetransfer.nashville.gov/portals/0/sitecontent/Human%20Relations%20Commission/docs/Title%20VI%2001-MHRC-FINAL.pdf>

Title VI Compliance 101

Metropolitan Nashville Government





Metropolitan Government of Nashville

TWENTIETH JUDICIAL DISTRICT

HOWARD C. GENTRY

CRIMINAL COURT CLERK
DAVIDSON COUNTY

JUSTICE A. A. BIRCH BUILDING 408
2ND AVENUE NORTH • SUITE 2120

NASHVILLE, TN 37201

615-862-5601

The Criminal Court Clerk is required to certify compliance with **Title VI of the Civil Rights Act** by informing employees/clients/constituents/applicants of their rights under Title VI of the 1964 Civil Rights Act.

Title VI of the Civil Rights Act states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

By signing below, I acknowledge that I received training regarding the *Title VI of the Civil Rights Act of 1964*. I agree to abide by the principles that were explained in this training. I understand that if I have any questions that were not addressed in training or if I encounter any problems, I can contact my immediate supervisor or the Human Resources Director.

Employee Signature

Date

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Criminal Justice Planning Unit Year: 2025

Title VI Coordinator: Samantha Taylor Form Completed By: Samantha Taylor

Form Completion Date: 5/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☐ Yes ☒ No

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

☐ Yes ☐ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☐ Yes ☒ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☐ Posted Signs ☐ Website☐ Other

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

☐ Yes ☒ No

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

☒ Yes ☒ No

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

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

[illegible]

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

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

Criminal Justice Planning department is a non-civil service department that is not open to the public. However, if language assistance is needed, one can be provided.

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

☐ Yes ☒ No[illegible]

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

Steering Committee and Advisory Board members are selected based on Executive Orders No. 99-005 and No. 021.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Department of Emergency Communications Year: 2025

Title VI Coordinator: Lynette S. Dawkins Form Completed By: Lynette S. Dawkins

Form Completion Date: 6/23/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

DEC uses language line and that information is provided to all DEC employees in our call taking manual and in our training bulletin that is accessible to all employees via PowerDMS (cloud-based compliance management platform)

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No☐ Posted Signs ☐ Website

☒ Other The public will be informed verbally of the complaint procedure.

☐ Yes ☒ No

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

☒ Yes ☐ No

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

[illegible]

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

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

We do not receive Federal financial assistance. Due to the nature of our work, we do not have a written language plan, but we do use a translation service to assist with communicating with customers who are limited English proficient.

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

☐ Yes ☒ No[illegible]

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

n/a



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Election Commission Year: 2025

Title VI Coordinator: Ricky Brown

Form Completed By: Ricky Brown

Form Completion Date: 5/20/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Metro has a Diversity and Inclusion training class that must be taken by all new employees. All employees take a State Title VI training class annually and the Metro class every 4 years.

☐ Not Provided

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

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

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

☐ Yes ☒ No

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

I will attend the training in the fall and will provide any information needed by employees.

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☒ No

Title VI Complaint Procedure

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No

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

☐ Posted Signs ☐ Website

☒ Other Voters are encouraged to file a written complaint about any issues with voting, which is available to all voters during Early Voting, as well as on Election Day.

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

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☐ Yes ☒ No

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

Election related language access is not permissible unless prescribed by the federal government.

Minority Representation on Planning or Advisory Bodies

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

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

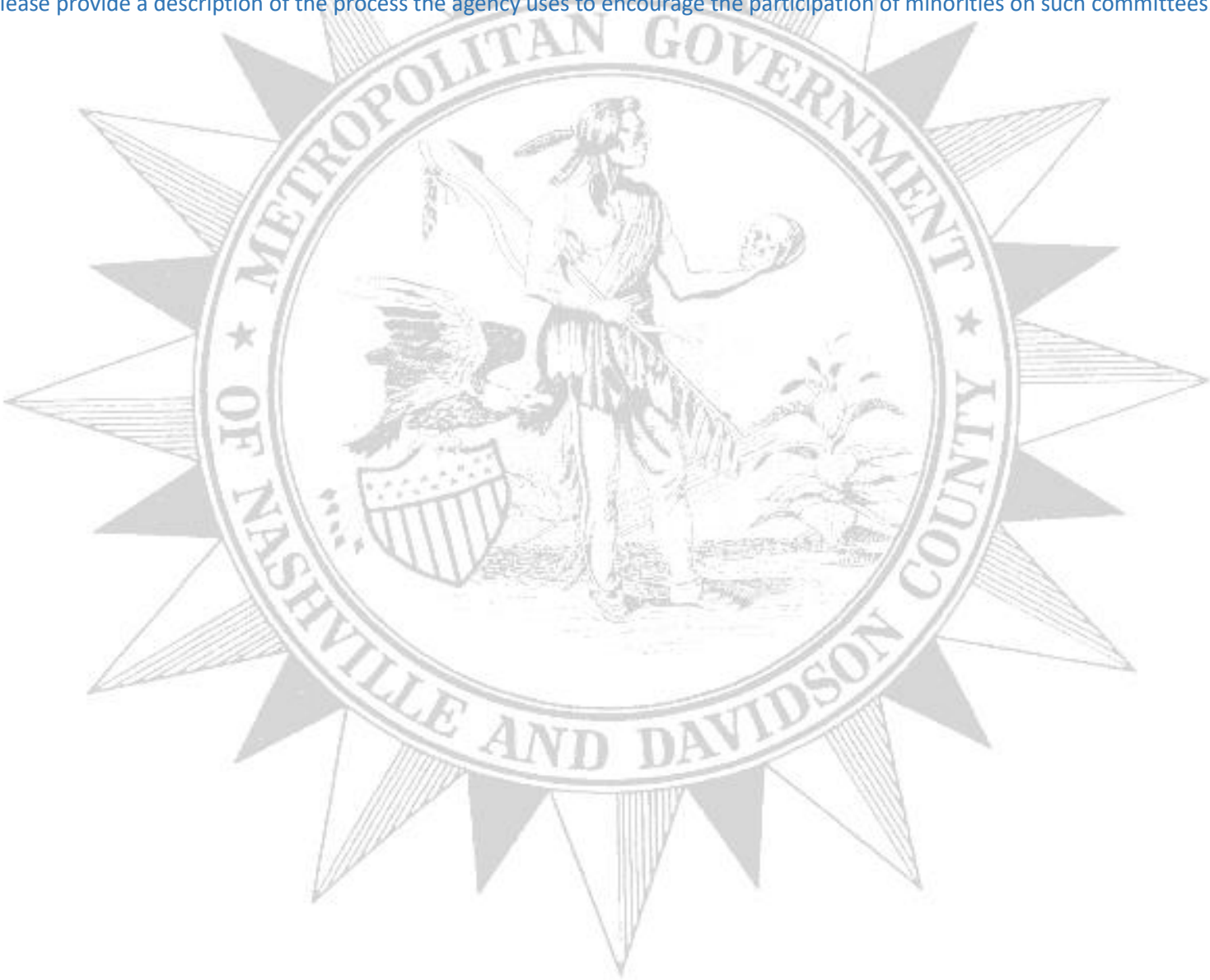
☐ Yes ☒ No

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

Name	Race

	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Farmers' Market Year: 2025

Title VI Coordinator: David Griffin Form Completed By: David Griffin

Form Completion Date: 6/2/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Provided during onboarding as part of reviewing all handbooks, policies and procedures.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

It is listed in the department handbooks that employees review for operations and communicated to merchants. We also review all of the language options to translate information along with mentioning that Metro has a contract for language services.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

It is listed in our department handbooks.

Do you provide this in languages other than English?

☐ Yes ☒ No

Title VI Complaint Procedure

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☐ Posted Signs ☒ Website

☒ Other

Board agendas and in departmental handbooks for tenants and vendors.

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

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

The department would partner with Metro Human Relations should this need arise on a case by case basis.

Minority Representation on Planning or Advisory Bodies

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

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

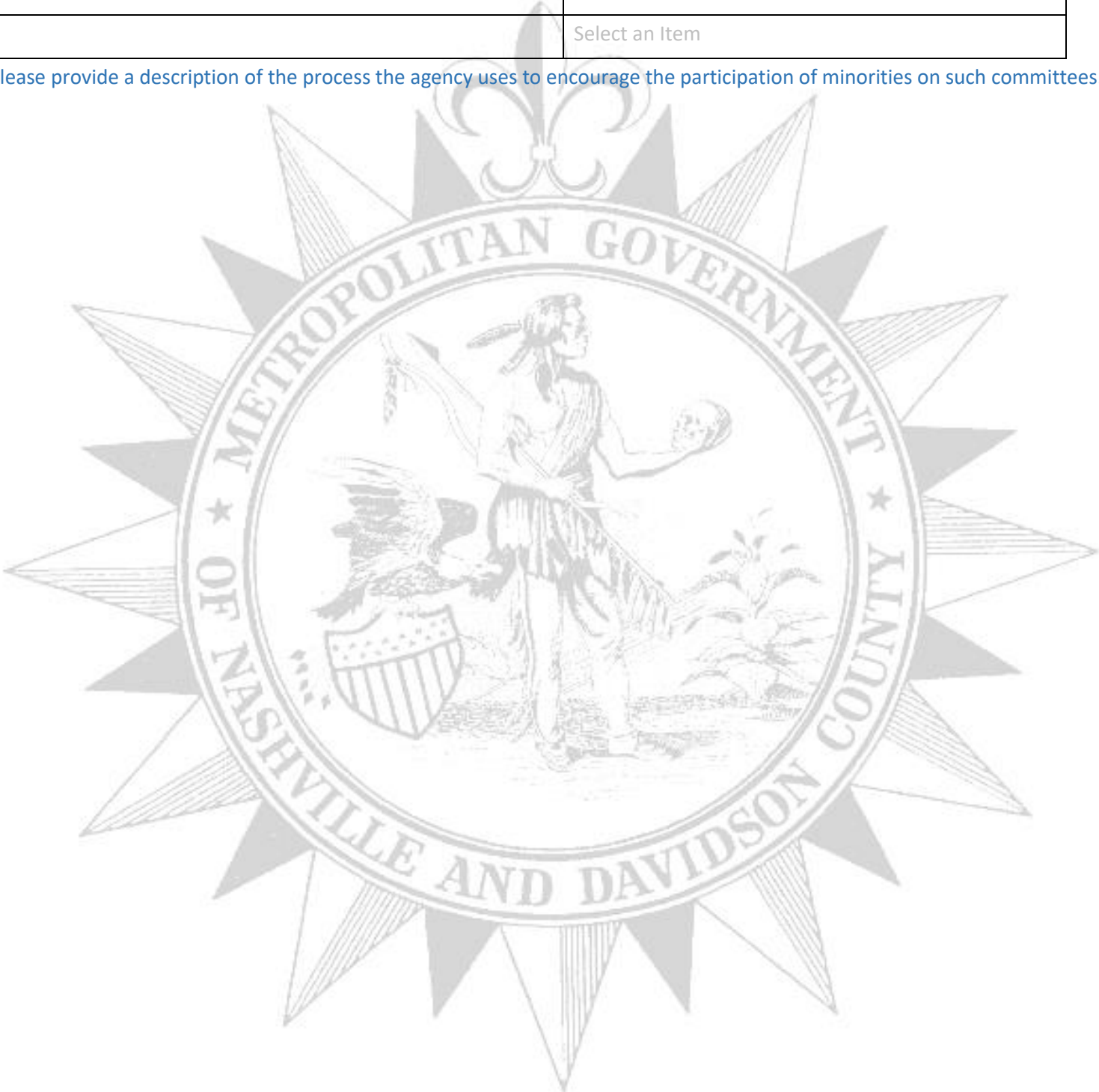
☐ Yes ☒ No

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

Name	Race
	Select an Item
	Select an Item
	Select an Item

	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

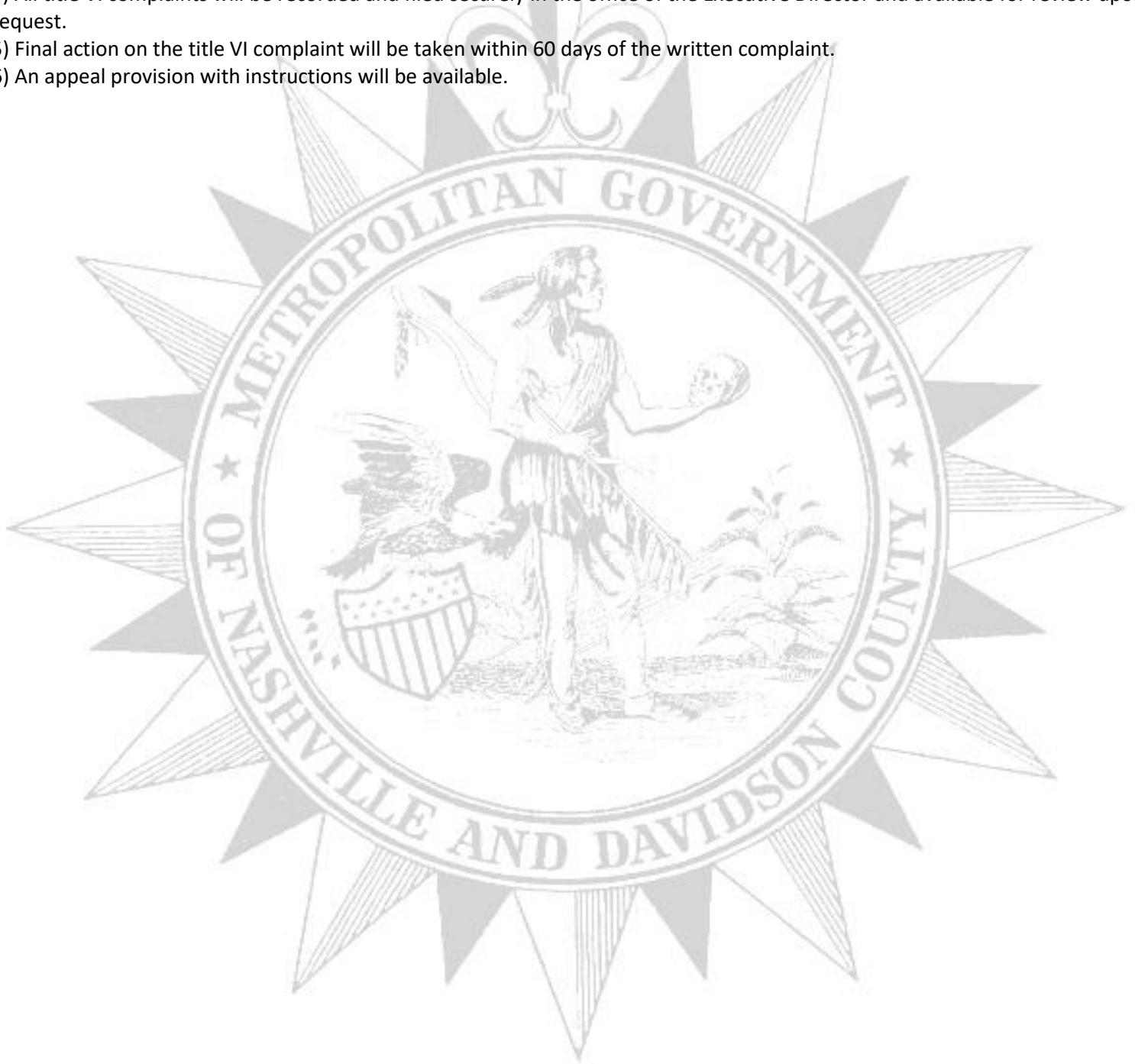
Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Nashville Farmers' Market

Title VI Complaint Procedures

- 1) All title VI complaints will go to the Nashville Farmers' Market Executive Director within 180 of the complaint to review and investigate. A written documented report of the facts will be compiled and filed by the Executive Director and recorded in a Complaint log and presented to the NFM Board of Directors.
- 2) The complaint will be forwarded to the HRC for investigation.
- 3) The Nashville Farmers' Market Executive Director will execute the recommendations from the HRC.
- 4) All title VI complaints will be recorded and filed securely in the office of the Executive Director and available for review upon request.
- 5) Final action on the title VI complaint will be taken within 60 days of the written complaint.
- 6) An appeal provision with instructions will be available.



	Select an Item
	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Finance Year: 2025

Title VI Coordinator: Kimberly Northern Form Completed By: Kimberly Northern

Form Completion Date: Click or tap to enter a date.

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

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

☒ Yes ☐ No☒ Posted Signs ☒ Website

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

☐ Yes ☐ No haven't had any since I've been in this role

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

☐ Yes ☒ No haven't had any since I've been in this role

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

[illegible]

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

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

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

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

☐ Yes ☒ No[illegible]

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Fire Year: 2025

Title VI Coordinator: Jamie Summers Form Completed By: Jamie Summers

Form Completion Date: 5/13/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No

If so, how is the training provided?

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Post on Bulletin boards

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

All public lobbies in buildings and Fire stations

☒ Yes ☐ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☒ Posted Signs ☐ Website☐ Other

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

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

Waiting to see if Human Relations puts a plan in place that is consistent across Metropolitan Government of Nashville & Davidson County.

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

[illegible]

	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: General Services Year: 2025

Title VI Coordinator: Brian Pate Form Completed By: Brian Pate

Form Completion Date: 6/16/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Fleet Heavy Shop, Fleet Light Shop, Lindsley Hall

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☒ Posted Signs ☐ Website☐ Other

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

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☐ Yes ☒ No

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

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

[illegible]

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

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

Waiting for guidance from Metro Human Relations Commission

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

☐ Yes ☒ No[illegible]

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



TITLE VI OF THE 1964 CIVIL RIGHTS ACT



The Law

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Applicability

Title VI covers all agencies receiving federal funds. Some examples include: student aid; employee training; grants; loans; property; loans of personnel; tax incentives; and technical assistance. Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or by a third party, within 90 days from the date of the alleged discriminatory act. Complaints should be directed to Metro Human Relations Commission, 150 2nd Ave N, Suite 217, Nashville, TN 37201, phone number **(615) 880-3370**.

It shall be against the policy of the Metropolitan Government to discriminate against an individual based upon that person's race, color or national origin.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: General Sessions Court Year: 2025

Title VI Coordinator: Gina Fox Form Completed By: Kyle Sowell and Gina Fox

Form Completion Date: 6/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided Only employees associated with federal assistance grants participate in Title VI training sponsored by the Tennessee Dept. of Mental Health and Substance Abuse Services or the Tn Human



Civil_Rights_Trainin
g_for_Employees 20.

Rights Commission PowerPoint on their website.

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

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

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

☒ Yes ☐ No

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

☒ We Do Not- All Title VI information including the Language Access Plan is provided to employees who are associated with federal assistance grants.

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Common areas within the offices of the Mental Health Court, Athena’s and Recovery Court including the locations where the participants attend treatment and in their participant handbooks.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

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



48A complaint
PP.docx

☒ Yes ☐ No

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

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

☐ Yes ☐ No

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

☒ Posted Signs ☐ Website

Other Written Title VI policy is provided to all participants within their participant handbook.

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

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes ☐ No

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

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

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

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

Monitoring Subrecipients

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

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

☒ Yes ☐ No

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

Each grant program manager monitors compliance for their perspective grant. Each Program Manager possesses the subrecipients Title VI compliance certificates.

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes ☐ No

 TN Spoken & Written LAP Revised

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

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

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

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Health Year: 2025

Title VI Coordinator: José Cruz

Form Completed By: José Cruz

Form Completion Date: 5/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

New hire orientation

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Email; intranet; posters

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

Lentz Public Health Center and all satellite clinics including Woodbine, East, South Nutrition Center, and MACC.

☒ Yes ☐ No

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

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

☐ Yes ☐ No

☒ Posted Signs ☐ Website

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

☒ Yes ☐ No

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

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

Date	Status	Action Taken	Summary

[illegible]

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

☒ Yes ☐ No

Metro Purchasing includes non-discrimination requirements in the procurement process based upon the specifications that we submit.

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No[illegible]



TITLE VI OF THE 1964 CIVIL RIGHTS ACT

The Law

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Metro Nashville and the Metro Public Health Department are committed to ensuring that the level and quality of public health services service are provided without regard to race, color, national origin, sex, age, disability, religion, medical condition, marital status or sexual orientation. We are further committed to promoting the full and fair participation of all potentially affected populations and in preventing denial, reduction, or delay in benefits related to programs and activities affecting minority and low-income populations; and providing meaningful access to MPH D services, programs, and activities by persons with limited English proficiency (LEP).

Applicability

Title VI covers all agencies receiving federal funds. Some examples include: student aid; employee training; grants; loans property; loans of personnel; tax incentives; and technical assistance.

Title VI applies to discrimination throughout an agency, not just actions involving federally assisted programs.

Filing a complaint

Title VI complaints involving recipients and beneficiaries may be filed with the Title VI Coordinator by an individual, a class, or by a third party, within 90 days from the date of the alleged discriminatory act. Complaints should be directed to: José Cruz Metro Public Health Department, 2500 Charlotte Avenue, Nashville, TN 37209. Our coordinator may also be reached by phone at **615.340.8963** if you have any questions or complaints regarding Metro Public Health Department Title VI compliance.

LANGUAGE ACCESS PLAN



**METRO PUBLIC HEALTH
DEPARTMENT OF NASHVILLE
& DAVIDSON COUNTY**



MetroPublicHealthDept
Nashville/Davidson County
Protecting, Improving, and Sustaining Health



March 2025

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MPHD LANGUAGE ACCESS STATEMENT

The purpose of this document is to establish guidelines for the Metro Public Health Department personnel to ensure equitable services for and effective communication with persons whose primary language is not English, and who have limited or no ability to speak, read, write, or understand the English language. This includes communities traditionally identified as Limited English Proficient (LEP) and D/deaf or Heard of Hearing. This policy is in accordance with Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, Section 1557 of the Affordable Care Act, and the Americans with Disabilities Act. Adherence to these guidelines is essential to ensure that all people in Nashville and Davidson County receive meaningful access to Metro Public Health Department programs, benefits, and services.

The vision of Metro Public Health is a community in which all people achieve their full potential for health and well-being. This document aims to serve as another tool to help guide the Department towards realizing that vision, and toward fulfilling our mission of protecting, improving, and sustaining the health and well-being of all people in Nashville and Davidson County.

TERMINOLOGY AND KEY PHRASES

Americans with Disabilities Act:

The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

Cultural & Linguistic Services:

Culturally and linguistically appropriate services (CLAS) is a way to improve the quality of services provided to all individuals, which will ultimately help reduce health disparities and achieve health equity. CLAS is about respect and responsiveness: Respect the whole individual and respond to the individual's health needs and preferences. Health inequities in our nation are well documented. Providing CLAS is one strategy to help eliminate health inequities.

D/deaf:

The word “Deaf” with a capital “D” refers to individuals and communities that identify with Deaf culture and American Sign Language. The word “deaf” with a lower case “d” refers to the condition of hearing loss.

Effective communication:

Effective communication is the process of exchanging ideas, thoughts, opinions, knowledge, and data so that the message is received and understood with clarity and purpose.

Communication is not effective if only one person can transmit their ideas.

Hard of Hearing:

Persons who are Hard of Hearing are those with hearing losses that may impair their understanding of sounds, including communication.

Interpreting:

Interpreting is rendering a spoken or signed message into another spoken or signed language, preserving the register, and meaning of the source language content. Bilingual staff may not necessarily have the linguistic skills or training to provide interpretation for highly technical sessions (i.e., legal, medical).

Languages of limited diffusion:

Languages of limited diffusion are those languages that are spoken by relatively small numbers of people, in contrast to languages that are spoken in several different countries and are widely taught.

Limited English Proficiency (LEP):

Limited English Proficiency refers to persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Meaningful Access:



Meaningful access is the ability to use services and benefits comparable to those enjoyed by members of the mainstream cultures. It is achieved by eliminating communication barriers and ensuring that the client or potential client can communicate effectively.

Non-English Language Preference (NELP):

NELP refers to individuals who prefer a non-English language, including sign language, with respect to a particular type of service, benefit, or encounter.

Over-the-phone Interpreting (OPI):

OPI is the act of verbally translating one language into another over the phone. This can be done via a 3-way call (you, the interpreter, and a client/patient).

Qualified Bilingual Employees (QBE):

A QBE is an individual who can communicate in a language other than English and who has successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed, per MPHD Qualified Interpreter Services Policy (2019).

Section 1557 of the Affordable Care Act:

Requires covered entities to provide effective communication with individuals with disabilities, including those with limited English proficiency, and to provide language assistance services free of charge, in an accurate and timely manner.

Title VI of the Civil Rights Act of 1964:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be

denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance”.

Translation:

Translation is the process of converting the written word from one language into another language in a way that is culturally and linguistically appropriate so it can be understood by its intended audience.

Vital documents:

Any documents that are critical for ensuring meaningful access to MPHD’s major activities, programs, and services. Whether or not a document is vital may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the person who prefers a non-English language if the information in question is not provided accurately or in a timely manner. Such documents may include, but are not limited to:

- Applications and consent forms
- Program related compliance plans
- Notices and letters containing important information regarding participation in a program.
- Notices pertaining to the reduction, denial, or termination of services or benefits, the right to appeal such actions, or that require a response from the beneficiary, and
- Notices advising persons with a non-English language preference of the availability of free language assistance.

Video Remote Interpreting (VRI):

VRI uses audio and video technologies to provide MPHD clients and patients with spoken or sign language interpreting through a remote or off-site interpreter.

QUALIFIED INTERPRETER SERVICES POLICY (2019)

Qualified interpreter services are provided during all hours of operation at no cost to customers and their companions in accordance with federal laws, including Section 1557 of the Patient Protection and Affordable Care Act, and Title VI of the Civil Rights Act of 1964. Section 1557 prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. Covered entities are prohibited from relying on unqualified staff when providing language assistance services. Title VI prohibits discrimination based on race, color, or national origin in programs or activities which receive federal funding. The law also requires that customers be told they have a right to receive interpreter services, including sign language, and how to address and file complaints pertaining to interpreter services. An ability to speak the patient's language does not necessarily qualify an individual to interpret medical discussions.

Policy

Qualified interpreter services will be provided to LEP individuals during regular MPHD business hours. No individual will be denied services based on an ability to speak English. Interpreter services must be appropriate to the situation.

Procedure

1. Any customer/patient who expresses a preference for a non-English language, including sign language, or has demonstrated a need for interpreter services shall be offered the use of a qualified interpreter at all administrative and clinical points of contact during all hours of operation at no charge to the client/patient. The offer of qualified interpreter services is made even in a situation where a client/patient is accompanied by a companion who may be capable of interpreting for the client/patient. If language assistance is needed after regular business hours, MPHD staff can use the services of the approved over-the-phone language vendors. Please contact your supervisor or the Cultural & Linguistic Services manager if you need information on how to contact the approved language vendors.
2. Posted notices of the availability of free language assistance services include the contact information for MPHD's Title VI Coordinator where clients/patients may inquire and/or file complaints about how MPHD delivers language assistance services
3. The reliance on adult family members, companions, and/or friends as interpreters is inappropriate. However, the client/patient has the right to refuse the interpreter services MPHD offers; such refusal must be documented. A qualified interpreter may be asked to monitor the encounter to ensure

full comprehension by all parties and promote patient autonomy.

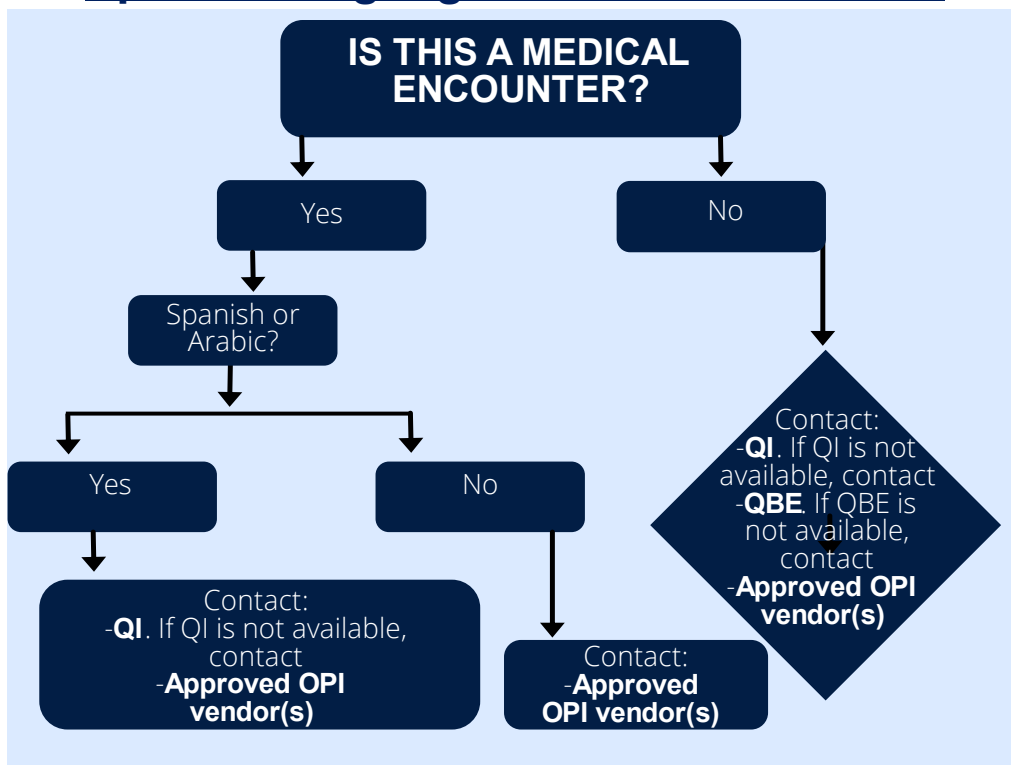
4. Occasionally, the sensitive nature of a patient's clinical condition may cause providers or staff to request qualified interpreter services to participate in the encounter despite the patient's preference to use an adult family member or a friend. In such situations, the circumstances leading to the override of the patient's preference are documented in the medical record, as applicable.
5. Minor children shall not be used as interpreters except in extraordinary situations such as medical emergencies where any delay could result in harm to a client/patient, and only until a qualified interpreter is available. Use of a minor child for interpretation under these circumstances should be documented in the medical record, as applicable.
6. The use of language apps or other electronic translation devices is inappropriate as they are unprofessional and unreliable forms of translation.
7. Clients/Patients shall not be asked to bring their own interpreter to an administrative or clinical point of contact.
8. D/deaf and Hard of Hearing clients/patients have a right to qualified interpreter services to ensure effective communication. Please contact the Cultural & Linguistic Services manager to request and schedule a sign language interpreter.

9. Bilingual employees are not qualified interpreters and therefore cannot provide qualified interpreter services.

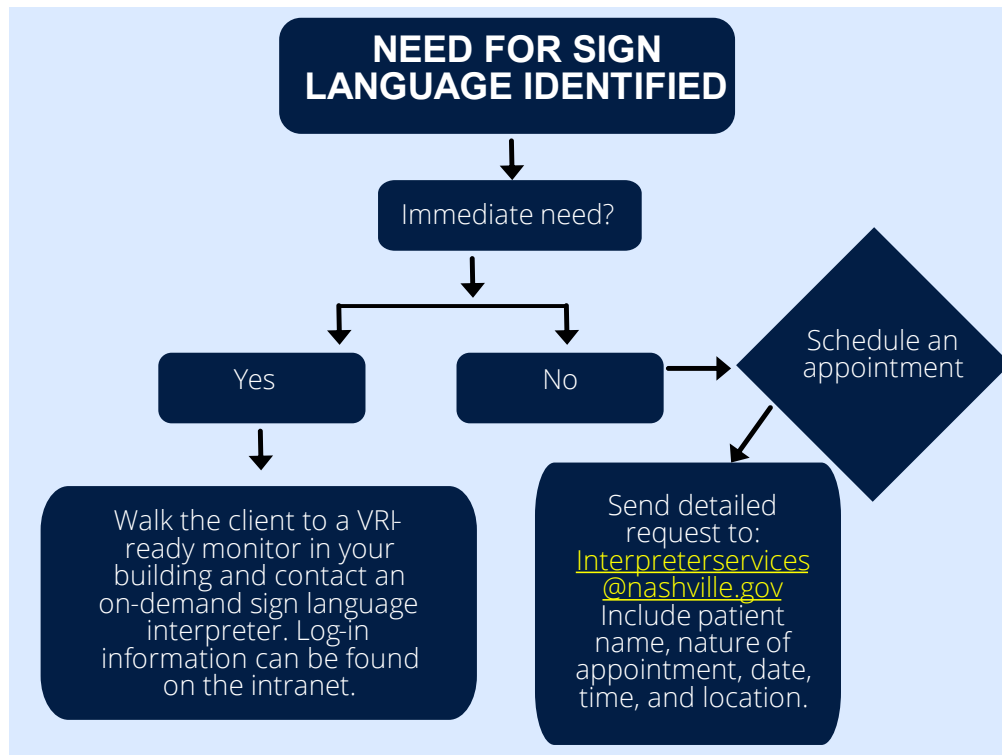
Applicability

This policy applies to all Metro Public Health Department employees and contractors.

Spoken Language Assistance Process



Sign Language Assistance Process



Please find the policy in its entirety on the MPHD intranet under Interpreter Services, at [Staff Interpreters \(nashville.org\)/](http://nashville.org/Staff-Interpreters)

LANGUAGE ACCESS SERVICES

One of the goals of the Cultural and Linguistic Services Division is to ensure that Metro Public Health (MPHD) communicates effectively with persons with a non-English language preference, including persons who use sign language. This requires effective communication at all points of contact. To ensure meaningful access, MPHD personnel shall provide reasonable and free language access services to persons with a non-English language preference whom they encounter, or whenever someone requests language access services relating to MPHD programs or activities. The nature and scope of language access services provided are based on the encounter, request, totality of the circumstances, and using the following four-factor analysis:

- The number or proportion of persons with a non-English language preference served or encountered in the eligible service population.
- The frequency with which persons with a non-English language preference come in contact with the program.
- The nature and importance of the service or benefit provided by the program, and
- The resources available to the agency and costs.

Any MPHD personnel who have questions about whether, or how, to provide effective language access services to persons with a non-English language preference should refer to the Cultural and

Linguistic Services (CLS) manager. The CLS manager serves as the point of contact for MPHD's language access efforts.

Interactions with Persons with a Non-English Language Preference

- **Staff responsibility** – At the first point of contact with a person who expresses a preference for a non-English language, or if it becomes evident that a person does not speak and understand English well enough to effectively participate or fully understand questions and answer them without difficulty, MPHD personnel should determine the person's primary language and obtain appropriate language access services. MPHD personnel may seek assistance from a supervisor or the CLS manager.
 - Contact an interpreter when the client/patient:
 - Requests it.
 - Speaks English as a second language and is in a stressful, complex, or unfamiliar situation.
 - Is not easily understood.
 - Responds only in a limited way.
 - Relies on family or friends to interpret.
 - Wishes to communicate in their preferred language.
 - Cannot grasp or respond to questions in English.
 - Use an "I Speak..." card (see **NOTICES** section)

- Remember: an interpreter serves the MPHD employee as well as the client/patient. You can request an interpreter if you believe you need one. To determine a client's level of English language proficiency, ask open-ended questions that require more than a 'yes' or 'no' answer, such as 'How may I help you today?'
- **Supervisor responsibility** – MPHD supervisors, in consultation with the CLS manager, should ensure that MPHD personnel who interact with persons with a non-English language preference, are prepared to do the following:
 - Determine the primary language of a person with a non-English language preference.
 - Have “I Speak...” cards available.
 - Share OPI access codes/PIN.
 - Utilize appropriate resources to provide reasonable and free language access services to persons with a non-English language preference.
 - Interpreters contact information badges (aka. Badge buddies)
 - Post notices of free interpreter services.

Best Practices When Providing Language Access Services

When providing reasonable and free language access services to persons with a non-English language preference, MPHD personnel should consider:

- **In-house Interpreters**
 - MPHD has qualified in-house interpreters that are available in person and by phone at multiple clinic

locations. A qualified interpreter is a person who can interpret effectively, accurately, and impartially, using necessary specialized vocabulary.

- Updated contact information for the in-house interpreters can be found on the MPHD intranet.

Cultural & Linguistic Services		
MPHD Qualified Interpreters		
	Asmaa Abbou Chaar	615.987.4926 Arabic <> English
	Yousef Alhindi	615.416.0454 Arabic <> English
	Eucaris Carlino	615.339.0727 Spanish <> English
	Nadia Castillo	615.477.0687 Spanish <> English
	José Cruz	615.330.1546 Spanish <> English
	Crystal Figueroa	615.571.7287 Spanish <> English
	Astrid Gallardo	615.879.1736 Spanish <> English
	Paula Garcia	615.879.0268 Spanish <> English
	Jorge Luna	615.708.1050 Spanish <> English
	Jay Quezada	615.339.0171 Spanish <> English
	Karel Santana	615.416.0466 Spanish <> English

- MPHD also has qualified bilingual employees (QBEs). QBEs are persons who can communicate effectively in a language other than English and who have successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed, within their home division or program. For example, a WIC QBE can only assist with WIC non-medical encounters.
- **Over-the-phone Interpreting (OPI)**
 - OPI is a 3-way telephone conference call between two persons who speak different languages, and an interpreter.

- Ask your supervisor about your program's OPI access codes/PINs to access OPI vendor services.
 - **Supervisor responsibility** – Contact the CLS manager if you need an access code/PIN for your program.
- Currently, MPHD has multiple vendors that offer OPI. Updated contact information for the OPI vendors can be found on the MPHD intranet.
 - Call an in-house interpreter first.
 - If they are unavailable, or you need a language that is not offered in-house, call one of the OPI vendors. If you cannot connect with an interpreter within a reasonable amount of time, hang up and call another OPI vendor.



- **Video Remote Interpreting (VRI)**

- MPHD has VRI-ready monitors at each site. Refer to the site manager or the CLS manager for more information.
 - For login information, refer to the [MPHD intranet](#).
 - Currently, the VRI-ready monitors are available for on-demand sign language interpretation needs.



- The Americans with Disabilities Act (ADA) and Rehabilitation Act of 1973 requires healthcare providers to ensure effective communication with people who are D/deaf or Hard of Hearing.
- Please use designated VRI-ready monitors as screen size is important and has been taken into consideration.
 - Screen size needs to be sufficient for the video interpreter's hand signs to be easily readable at a distance.

- Integrated camera and speakers have also been considered. They capture clear video of the patient signing and allow the provider to clearly hear the interpreter.
- There is at least one VRI-ready monitor per MPHD building. Please ask the site/clinic manager or the CLS manager where the monitor is currently located.

- **Translation Services**

Translation is the process of converting the written word from one language into another language in a way that is culturally and linguistically appropriate so it can be understood by its intended audience.

Translation is another tool that can be used to engage the community and increase language access throughout everything we do at MPHD. Translation should be considered for our public communications, social media posts, educational materials, and vital documents. Although the translation process takes time, priority will be given to information that needs to be disseminated as soon as possible. Please plan ahead.

- The Cultural and Linguistic Services (CLS) division offers in-house translations. All requests can be sent to InterpreterServices@nashville.gov or the CLS manager.
- CLS will follow an internal process for deciding whether a translation can be completed in-house. The process includes reviewing the length of the document,

complexity, and considering the available resources (i.e., staff, time). If it is determined that a translation cannot be worked on in-house, CLS will provide options, including contacting a translation vendor to complete the project.

- Refer to **TERMINOLOGY AND KEY PHRASES** under **Vital Documents** for a list of documents that should be considered for translation.

While qualified interpreters may not be readily available when needed, please take the time to call all qualified sources including in-house interpreters and qualified vendors (via OPI or VRI). Do not use children as interpreters except in emergency cases, and only until a qualified interpreter is available. Do not rely on friends, family members, or machine translation for interpretation or translation, and do not ask clients to provide their own interpreters. Clients should be informed that interpreter services are available to them at no cost. If a client refuses to work with a qualified interpreter and prefers to communicate via a friend or family member, it is up to the provider to determine if an interpreter should still be used to ensure effective communication.

Machine translation alone is generally insufficient to meet civil rights requirements. Any use of these tools must be reviewed by a **qualified human interpreter/translator** when the underlying text is critical for meaningful access to an activity or program for people with LEP.

TRAINING

Staff training is an important step in providing language access services to individuals with a preference for a non-English language. Trainings should include everyone who interacts with clients/patients. MPHD offers an annual **Title VI and Language Access Services** training. The training can be found in LMS. MPHD also includes training about communication and language services as part of the onboarding process for new hires. It is also important that all staff members periodically receive refreshers regarding policies, processes, and resources.

- **Staff Responsibility** – Complete annual **Title VI and Language Access Services** training. Ask your supervisor about the available resources in your work area (i.e., badges with interpreter numbers, the PIN for OPI, etc.).
- **Supervisor Responsibility** – Complete annual **Title VI and Language Access Services** training. Ensure that staff is aware of and able to access resources that are specific to your site. Consult with the CLS manager if necessary.
- **CLS Division Responsibility** – Update the annual training and the MPHD intranet with relevant information. Ensure that appropriate resources are available for staff (i.e., badges with interpreter numbers, rack cards with relevant information, etc.).

If you have a specific need for training or education related to culturally and linguistically appropriate services, please contact the CLS manager.

NEEDS ASSESSMENT

To best serve the needs of linguistic minorities, it is necessary to have in place the practices and guidelines that ensure effective and meaningful access to information, resources, programs, and other services. Best practices include:

- **Annual Assessment**
 - Updating translated vital documents along with English originals.
 - Assessing changes in demographics, types of services, or other needs that may require reevaluation of language access policies and procedures.
- **Data Collection**
 - Collecting information on primary language of clients/patients, use and language of interpretation services, distribution of translated documents.

MONITORING AND CONTINUOUS IMPROVEMENT

Without appropriate interpretation and translation services, it can be difficult to communicate effectively with persons with a non-English language preference, which can result in liability related to poor health outcomes, lower client/patient satisfaction, and violation of Federal laws prohibiting discrimination on the basis of national origin. Providing high-quality language access services at each point of contact along the health care continuum is a critical component of high-quality care.

- **Staff Responsibility** – Inform the CLS manager of any specific challenges encountered in your division, site, or program.
 - What can be done to improve language access services in your area?
- **CLS Division Responsibility** – Inform division, site, and program managers regarding changes to the language access services. Engage in ongoing conversations regarding the improvement of services and work with leadership concerning challenges that need to be addressed in order to be in compliance.

COMPLAINTS

A complaint regarding the inadequate provision of language assistance may be made in person, over the phone, or in writing to the CLS manager. Complaints can be initiated by members of the public or a staff member that has witnessed situations that are in violation of Title VI. Written language access complaints can also be sent via email to InterpreterServices@nashville.gov – please add **Language Access Complaint** to the subject line to ensure it is forwarded to the CLS manager.

The CLS manager (or a designee) shall conduct an investigation of the complaint. This investigation will allow all interested persons an opportunity to submit evidence relevant to the complaint. The CLS manager will make referrals, as appropriate, for action.

A person may file a complaint directly with the U.S. Department of Health and Human Services, Office for Civil Rights. A person can file such a complaint electronically through the Office for Civil Rights Complaint Portal, which is available at:

<https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf> or by mail or phone at: U.S. Department of Health and Human Services, 200 Independence Avenue, SW, Room 509F, HHH Building,

Washington, D.C. 20201. Complaint forms are available at:

<https://www.hhs.gov/ocr/office/file/index/html/index.html>. Such complaints must be filed within 180 days of the date of the alleged discrimination. The availability and use of this grievance procedure does not prevent a person from pursuing other legal or



administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, age, disability, or sex in court or with the U.S. Department of Health and Human Services, Office of Civil Rights.

EVALUATION

Source: Metro Language Access Guide & Toolkit, ADA & Title VI Resources – Metro Human Relations Commission

Program managers are encouraged to complete their own language access assessment to reflect on how their program/division is promoting equitable access.

Understanding How Linguistic Minorities Interact with Your Agency

1. Does your agency interact or communicate with the public or are there individuals in your agency who interact or communicate or might interact or communicate with linguistic minorities?

☐ Yes

☐ No

2. Please describe the manner in which your agency interacts with linguistic minorities:

☐ In-Person

☐ Telephonically

☐ Electronically (e.g., email or website)

☐ Via Correspondence

☐ Other: (please specify) _____

3. Does your agency provide federal financial assistance to any non-federal entities? (Federal financial assistance includes grants,

training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies to nonprofits and other organizations.)

☐ Yes

☐ No

4. If your agency does provide federal financial assistance to non-federal entities:

a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?

☐ Yes

☐ No

b. Does your agency inform recipients of federal financial assistance that they should budget for language assistance services?

☐ Yes

☐ No

c. Does your agency inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?

☐ Yes

☐ No

5. How does your agency identify linguistic minorities? (Select all that apply)

- ☐ Assume limited English proficiency if communication seems impaired.
- ☐ Respond to individual requests for language assistance services.
- ☐ Self-identification by the non-English speaker
- ☐ Ask open-ended questions to determine language proficiency on the telephone or in person.
- ☐ Use of “I Speak” language identification cards or posters.
- ☐ Based on written material submitted to the agency (e.g., complaints)
- ☐ We have not identified linguistic minorities.
- ☐ Other (Please specify):

6. Does your program have a process to collect data on:

a. The number of linguistic minorities that you serve?

- ☐ Yes
- ☐ No

b. The number of linguistic minorities in your service area?

- ☐ Yes
- ☐ No

c. The number and prevalence of languages spoken by linguistic minorities in your service area?

☐ Yes

☐ No

7. How often does your agency assess the language data for your service area?

☐ Annually

☐ Biennially

☐ Not Sure

☐ Other:_____

8. What data does your agency use to determine the linguistic minority communities in your service area? (Select all that apply)

☐ Census

☐ US Dept. of Education

☐ US Dept. of Labor

☐ State Agencies

☐ Community Organizations

☐ Intake information

☐ Other:

9. Do you collect and record primary language data from individuals when they first contact your programs and activities?

☐ Yes

☐ No

10. If you collect and record primary language data, where is the information stored?

11. What is the total number of linguistic minorities who use or receive services from your program each year?

12. How many linguistic minorities attempt to access your programs or services each month?

13. How many linguistic minorities use your programs or services each month?

14. Specify the top five most frequently encountered non-English languages (including American Sign Language) by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).

Language and Frequency of Encounters

1. _____

2. _____

3. _____

4. _____

5. _____

Providing Language Assistance Services

15. Does your agency currently have a system in place for tracking the type of language assistance services it provides to linguistic minorities at each interaction?

☐ Yes

☐ No

16. What data, if any, do you maintain regarding language assistance services? (Select all that apply)

☐ Primary language of persons encountered or served

☐ Use of language assistance services such as interpreters and translators

☐ Funds or staff time spent on language assistance services

☐ Number of bilingual staff

☐ Cost of interpreter services

☐ Cost of translation of materials into non-English languages

☐ Other (Please specify): _____

17. Does your agency have a system to track the cost of language assistance services?

☐ Yes

☐ No

18. What types of language assistance services does your agency provide? (Select all that apply)

☐ Bilingual staff

☐ In-house interpreters (oral)

☐ In-house translators (documents)

☐ Contracted interpreters

☐ Contracted translators

- ☐ Telephone interpretation services
- ☐ Video interpretation services
- ☐ Language bank or dedicated pool of interpreters or translators
- ☐ Volunteer interpreters or translators
- ☐ Interpreters or translators borrowed from another agency
- ☐ Other (Please specify): _____

19. Does your agency have a certification or assessment process that staff must complete before serving as interpreters or translators for linguistic minorities?

- ☐ Yes
- ☐ No

a) Does the process include use of standardized language proficiency exams?

- ☐ Yes
- ☐ No

20. Does your agency ask or allow linguistic minorities to provide their own interpreters or have family members or friends interpret?

- ☐ Yes
- ☐ No

21. Does your agency have contracts with language assistance service providers (in- person interpreters, telephone interpreters, video interpreters, or translators)?

☐ Yes

☐ No

22. Does your agency provide staff with a list of available interpreters and the non-English languages they speak, or information on how to access qualified interpreters?

☐ Yes

☐ No

23. Does your agency identify and translate vital documents into the non-English languages of the communities in your service area?

☐ Yes

☐ No

24. Which vital written documents has your agency translated into non-English languages?

☐ Consent forms

☐ Complaint forms

☐ Intake forms

☐ Notices of rights

☐ Notice of denial, loss or decrease in benefits or services

☐ Notice of disciplinary action

☐ Applications to participate in programs or activities or to receive benefits or services

☐ Other (please specify): _____

Training of Staff on Policies and Procedures

25. Does all agency staff receive initial and periodic training on how to access and provide language assistance services to linguistic minorities?

☐ Yes

☐ No

26. Who receives staff training on working with linguistic minorities? (Select all that apply)

☐ Management or senior staff

☐ Employees who interact with or are responsible for interactions with linguistic minorities

☐ Bilingual Staff

☐ New employees

☐ All employees

☐ Volunteers

☐ Others (Please specify):

☐ None of the above

27. Are language access policies and issues included in the mandatory training curriculum for staff?

☐ Yes

☐ No

28. Does your agency staff procedural manual or handbook include specific instructions related to providing language assistance services to linguistic minorities?

☐ Yes

☐ No

29. Does staff receive periodic training on how to obtain and work with interpreters?

☐ Yes

☐ No

30. Does staff receive periodic training on how to request the translation of written documents into other languages?

☐ Yes

☐ No

31. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?

☐ Yes

☐ No

32. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?

☐ Yes

☐ No

33. Does your agency translate signs or posters announcing the availability of language assistance services?

☐ Yes

☐ No

34. When your agency updates information on its website, does it also add that content in non- English languages?

☐ Yes

☐ No

Providing Notice of Language Assistance Services

35. How do you inform members of the public about the availability of language assistance services? (Select all that apply)

☐ Frontline and outreach multilingual staff

☐ Posters in public areas

☐ “I Speak” language identification cards distributed to frontline staff

☐ Website

☐ Social networking website (e.g. Facebook, Twitter)

☐ E-mail to individuals or a list serv

☐ Other (Please specify):

☐ None of the above

36. Do your translated program outreach materials inform linguistic minorities about the availability of free language assistance services?

☐ Yes

☐ No

37. Does your agency regularly advertise on non- English media (television, radio, newspaper, and websites)?

☐ Yes

☐ No

38. Does your agency inform community groups about the availability of free language assistance services for linguistic minorities?

☐ Yes

☐ No

39. Does your agency inform current applicants or recipients about the availability of language assistance services?

☐ Yes

☐ No

40. Does the main page of your agency website include non-English information that would be easily accessible to linguistic minorities?

☐ Yes

☐ No

41. Does your agency have multilingual signs or posters in its offices announcing the availability of language assistance services?

☐ Yes

☐ No

Monitoring and Updating a Language Access Procedures, Policy, and Plan

42. Does your agency have a written language access policy?

☐ Yes

☐ No

43. If so, is a description of this policy available to the public?

☐ Yes

☐ No

44. How often is your agency's language access policy reviewed and updated?

☐ Annually

☐ Biennially

☐ Not Sure

☐ Other:_____

45. When was the last time your agency's language access policy was updated?

Month:

Year:

46. How often does your agency update its data on the linguistic minority communities in your service area?

☐ Annually

☐ Biennially

☐ Not Sure

☐ Other: _____

47. Does your agency have a language access coordinator?

☐ Yes

☐ No

48. Does your agency have a formal language access complaint process?

☐ Yes

☐ No

49. Has your agency received any complaints because it did not provide language assistance services?

☐ Yes

☐ No

50. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?

☐ Yes

☐ No

51. Do you obtain feedback from linguistic minority communities on the effectiveness of your language access program and the language assistance services you provide?

☐ Yes

☐ No

NOTICES

Posting notices about the availability of language access services is an effective way to ensure persons with a non-English language preference can meaningfully access program services. It is helpful to post notices in the reception area and other areas where patients and staff interact. It may also be helpful to post notices on the website, at entrances, in examination rooms, and at other locations where individuals may interact with the Department and need assistance.

“I Speak” ...cards.

If presented with an “I Speak...” card, please honor the request and contact an interpreter. You can request cards from the CLS division and display them in your reception area.



Use this list for assistance in identifying a person's preferred language. You can request the list from the CLS division and display in your reception area.

INTERPRETERS AVAILABLE

You have access to interpretation services 24/7 at no personal cost to you.

This chart includes languages commonly spoken in your community, additional languages are available.

English: Do you speak [language]? We will provide an interpreter at no personal cost to you.

[illegible]

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Tennessee Relay (711)

Although it is best practice to use an in-person interpreter for sign language interpretation, it may be necessary to contact someone via phone using the appropriate numbers below.

Dial 711. It's a breeze to communicate with anyone and say "Hello!"

Tennessee Relay
tennrelay.com

Dialing **711** will connect you to Tennessee Relay, a free service which allows effortless communication for people who are deaf, deafblind, hard-of-hearing, speech-disabled, and hearing.

It is very simple to make phone calls. Just:

- 1) Dial **711** or use the toll-free numbers listed below.
- 2) Give the relay operator the number of the person you are calling.
- 3) Easily communicate - an operator will relay the messages between you and the other person.

TTY User	Voice User	Voice Carry-Over User
 TTY to Voice 800-848-0298	 Voice to TTY 800-848-0299	 Voice Carry-Over 866-931-9027
People with Speech Disabilities	Spanish User	Customer Service
 Speech-to-Speech 866-503-0264 Hearing Carry-Over 800-848-0298	 Spanish Relay 866-503-0263	 TTY or Voice 866-503-0262 Español 800-676-4290 Speech-to-Speech 877-787-1989 Voice Carry-Over 866-931-9027

■ www.tennrelay.com ■

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ARMN-0034/06-2022

Taglines

Another way to provide notices is through use of taglines on printed and electronic materials. Taglines are short sentences written in the individual's language notifying them of their right to language assistance, free of charge.

ENGLISH

Please let us know if you need interpreter services that are available to you at no cost. All authorized interpreters for the Metro Public Health Department (MPHD) have completed HIPAA privacy training and are required to comply with the privacy rules of MPHD.

We will also provide free oral translation of documents that have not already been translated in written form.

SPANISH

Por favor, infórmenos si necesita del servicio de interpretación que se encuentra disponible para usted y sin costo alguno. Además, ofrecemos servicio gratuito de traducción oral de documentos que aún no están traducidos por escrito.

Todos los intérpretes autorizados del departamento metropolitano de salud pública (MPHD) han completado una capacitación sobre privacidad en el marco de la ley de portabilidad y responsabilidad del seguro de salud (HIPAA, por sus siglas en inglés) y se les exige acatar las normas sobre privacidad del MPHD.

ARABIC

يرجى إعلامنا إذا كنت بحاجة إلى خدمات الترجمة الفورية المتاحة لك مجاناً. جميع المترجمين المفوضين في قسم مترى للصحة العامة أكملوا تدريب الخصوصية المعروف باسم هيبا . وهم مطالبون بالامتثال لقواعد الخصوصية الخاصة بقطاع مترى للصحة العامة.
كما سنوفر ترجمة شفوية مجانية للوثائق التي لم تتم ترجمتها بالفعل في صيغة مكتوبة.

BURMESE

သင့်အတွက် အခမဲ့ ရရှိနိုင်သည့် စကားပြန် ဝန်ဆောင်မှုများကို လိုအပ်ပါက ကျေးဇူးပြု၍ ကွန်ပဏီအား အသိပေးပါ။ မက်ထရို ပြည်သူ့ကျန်းမာရေး ဌာန (MPHD) အတွက် ခွင့်ပြုချက်ရရှိ ထားသည့် စကားပြန်များ အားလုံးသည် HIPAA သီအိုရီတည်ရှိသည့် သင်တန်းကို တက်ရောက်ရရှိခဲ့ပြီးဖြစ်ပြီး MPHD ၏ သီအိုရီတည်ရှိမှုမရှိသော စည်းမျဉ်းစည်းကမ်းများအတိုင်း လိုက်နာလုပ်ဆောင်ရန် လိုအပ်သည်။
စာဖြင့် ဖော်သားပြီး အာသာပြန်ထားခြင်း မပြုရသေးသည့် စာရွက်စာတမ်းများကို နှုတ်အားဖြင့် အာသာပြန်ပေးခြင်း ကိုလည်း ကွန်ပဏီအား အခမဲ့ ပံ့ပိုးဆောင်ရွက်ပေးပါမည်။

SWAHILI

Tafadhali tufahamishe kama unahitaji huduma za ukalimani ambazo zinapatikana kwako bila gharama yoyote. Wakalimani wote walioidhinishwa wa Idara ya Afya ya Umma ya Mjini (MPHD) wamekamilisha mafunzo ya faragha ya HIPAA na wanahitajika kutii kanuni za faragha za MPHD.
Tutatoa pia tafsiri ya bila malipo ya nyaraka ambazo hazijatafsiriwa tayari kwa kuandikwa.

NEPALI

तपाईंलाई तपाईंको लागि निः शुल्क रूपमा उपलब्ध हुने दोभाषे सेवाहरूको आवश्यकता पर्छ भने कृपया हामीलाई थाहा दिनुहोस्। मेट्रो सार्वजनिक स्वास्थ्य विभाग (MPHD) का सबै आधिकारिक दोभाषेहरूले HIPAA गोपनीयता प्रशिक्षण पूरा गर्नुभएको छ र उहाँहरूले MPHD का गोपनीयता नियमहरूको अनुपालना गर्ने आवश्यक हुन्छ।
हामीले पहिले नै लिखित रूपमा अनुवाद नगरिएका कागजातहरूको निः शुल्क मौखिक अनुवादन पनि उपलब्ध गराउँछौं।



Additional resources can be found on the MPHD intranet under [Interpreter Services](#).



QUALIFIED INTERPRETER SERVICES POLICY

Policy Name:	Qualified Interpreter Services		
Category:	Client/Patient Services		
Effective Date	July 2019	Last Reissue/Revision Date: July 2019	
Responsible Program or Bureau:	Human Resources	Review-By Date: July 2022	
Contact:	Program Supervisor	Phone Number: 615.340.8963	

I. Policy Summary

Qualified Interpreter Services are provided during all hours of operation at no cost to customers and their companions in accordance with federal laws, including Section 1557 of the Patient Protection and Affordable Care Act (PPACA), and Title VI of the Civil Rights Act of 1964. Section 1557 prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. Covered entities are prohibited from relying on unqualified staff when providing language assistance services. Title VI prohibits discrimination based on race, color, or national origin in programs or activities which receive federal funding. The law also requires that customers be told they have a right to receive interpreter services, including sign language, and how to address and file complaints pertaining to interpreter services. An ability to speak the patient's language does not necessarily qualify an individual to interpret medical discussions.

II. Policy

Qualified Interpreter services will be provided to Limited English Proficient individuals during regular MPHD business hours. No individual will be denied services based on an inability to speak English. Interpreter services must be appropriate to the situation.

III. Definitions

- Certified Medical Interpreter or Certified Healthcare Interpreter (CMI/CHI) – An individual who holds certification from the National Board of Certification for Medical Interpreters or from the Certification Commission for Healthcare Interpreters. A CHI/CMI is able to interpret effectively, accurately, and impartially, using any necessary specialized vocabulary. All CHI/CMIs will adhere

to continuing education requirements, as stipulated in the job description, and to the national standards of practice and code of ethics for interpreters in healthcare.

- Qualified Interpreter (QI) – An individual who is able to interpret effectively, accurately, and impartially, using any necessary specialized vocabulary. All interpreters employed by MPHD have successfully passed an interpreter skills assessment administered by an approved vendor and are therefore considered to be Qualified Interpreters. All Qualified Interpreters will adhere to continuing education requirements, as stipulated in the job description, and to the national standards of practice and code of ethics for interpreters in healthcare.
- Qualified Bilingual Employee (QBE) – An individual who can communicate in a language other than English and who has successfully passed a language skills assessment. QBEs are qualified to assist with non-medical encounters when needed.
- Bilingual Employee – An MPHD employee who speaks two languages. Bilingual employees can use their language skills to interact with customers/patients on their own behalf, but shall not provide interpretation or translation services.
- Non-medical encounter - An interaction between a customer and MPHD staff member that is not for the purpose(s) of providing healthcare service(s) or assessing the healthcare status of a customer.
- Medical encounter – An interaction between a patient and healthcare provider(s) for the purpose of providing healthcare service(s) or assessing the healthcare status of a patient.
- Contract Interpreter – A Qualified Interpreter employed by one of MPHD’s approved vendors.
- Point of contact – An instance where a customer/patient accesses services, either in person or via telephone.
- Interpreting – The facilitation of spoken or signed language communication between users of different languages.
- Translation – A written rendering of one language into another; written interpretation.

IV. Available Interpreter Services:

1. Medical Encounter Interpreting Services

- Interpreting on-site or over-the-phone, for medical personnel
 - Consecutive mode (*when the interpreter listens to what the speaker is saying, and conveys the message into another language after the speaker has paused*) during medical encounters
 - Simultaneous mode (*when the interpreter listens to what the speaker is saying while concurrently saying it in another language*), when appropriate
- Sight translation of medical documents

NOTE: Only the services of Qualified Interpreters competent in medical terminology in both the source and target language are used during medical encounters.

2. Non-Medical Encounter Interpreting Services

- Interpreting on-site or over-the-phone, for non-medical personnel
 - Consecutive mode during non-medical encounters
 - Simultaneous mode, when appropriate
- Assistance with appointment scheduling

- Assistance with following up on phone calls or messages in language other than English; monolingual, non-English assistance

NOTE: Non-medical encounters may use the services of either Qualified Interpreters (QIs) or Qualified Bilingual Employees (QBEs).

Types of Qualified Interpreters available:

- Certified Medical Interpreter (CMI) or Certified Healthcare Interpreter (CHI)
- Qualified Interpreter (QI)
- Contract Interpreter (in person, telephone)

The specific method for providing interpreter services for a particular point of contact depends on the nature of the encounter as well as the readily available services in the language needed. A Spoken Language Assistance graph in the *Procedure* section below will aid in the determination of the best mode of interpretation assistance per encounter type.

Face-to-face/on-site Interpreter or Contract Vendor Interpreters: When the communication required is lengthy, complex, critical, sensitive in nature, involves visual cues and/or requires specialty medical interpreting.

Telephone Interpreter Services: For shorter routine conversations that need immediate access to a spoken language interpreter and visual cues are not necessary.

Sight translation of documents used during customer/patient visits may be provided in person, through qualified spoken/sign language assistance, or, as appropriate, through a telephone interpreter service.

All individuals providing Qualified Interpreter services to customers and patients are bound by the professional interpreter code of ethics, which requires interpreters to maintain confidentiality, comply with the Health Insurance Portability and Accountability Act (HIPAA), and adhere to all existing federal or state laws. The National Code of Ethics for Interpreters in Health Care established by the National Council on Interpreting in Health Care states that “the interpreter treats as confidential, within the treating team, all information learned in the performance of their professional duties, while observing relevant requirements regarding disclosure.”

V. Procedure

1. Any customer/patient who expresses a preference for a non-English language or has demonstrated a need for interpreter services shall be offered the use of a Qualified Interpreter at all administrative and clinical points of contact during all hours of operation at no charge to the customer/patient. The offer of Qualified Interpreter services is made even in a situation where a customer/patient is accompanied by a companion who may be capable of interpreting for the customer/patient. If language assistance is needed after regular business hours, MPHD staff can use the services of the approved over-the-phone language vendors. Please contact HR if you need information on how to contact the approved language vendors.

2. Posted notices of the availability of free language assistance services include the contact information for our Title VI Coordinator where customers/patients may inquire and/or file complaints about how MPHD delivers language assistance services.

3. The reliance on adult family members, companions, and/or friends as interpreters is inappropriate. However, the customer/patient has the right to refuse the interpreter services we offer; such refusal must be documented. A Qualified Interpreter may be asked to monitor the encounter to ensure full comprehension by all parties and promote patient autonomy.

4. Occasionally, the sensitive nature of a patient's clinical condition may cause providers or staff to request Qualified Interpreter services to participate in the encounter despite the patient's preference to use an adult family member or a friend. In such situations, the circumstances leading to the override of the patient's preference are documented in the medical record, as applicable.

5. Minor children shall not be used as interpreters except in extraordinary situations such as medical emergencies where any delay could result in harm to a customer/patient, and only until a Qualified Interpreter is available. Use of a minor child for interpretation under these circumstances should be documented in the medical record, as applicable.

6. The use of language apps or other electronic translation devices is inappropriate as they are unprofessional and unreliable forms of translation.

7. Customers/Patients shall not be asked to bring their own interpreter to an administrative or clinical point of contact.

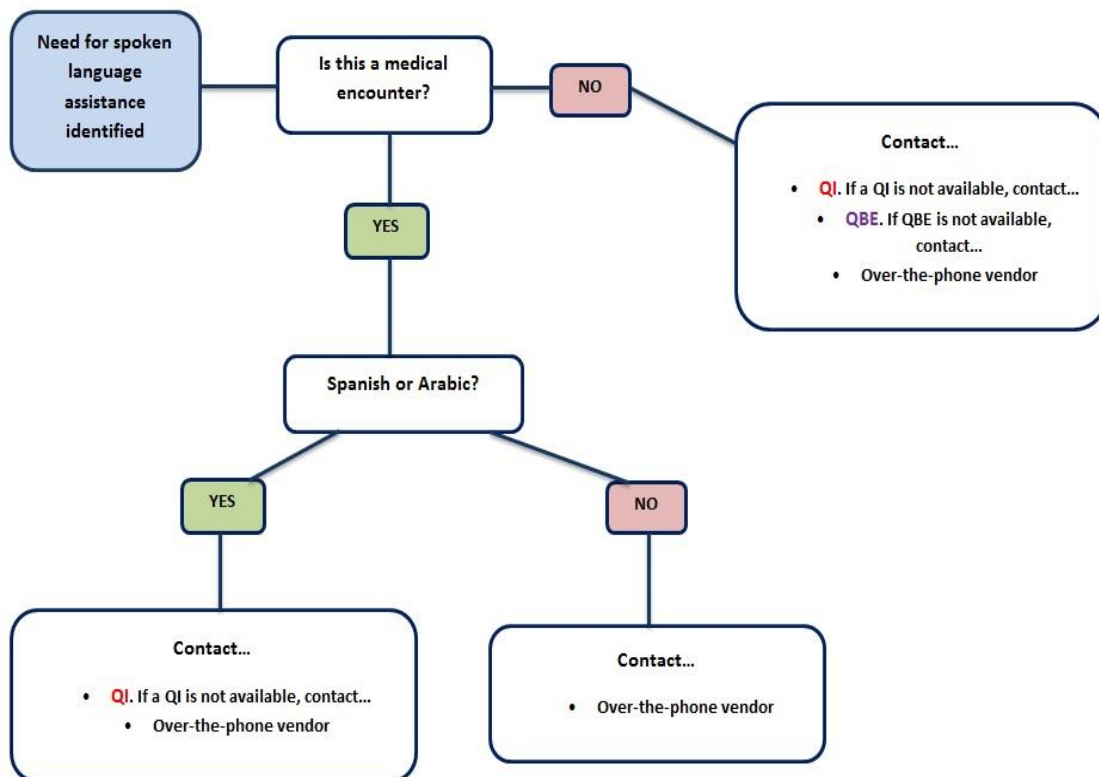
8. Deaf and hard of hearing customers/patients have a right to Qualified Interpreter services to ensure effective communication. Please contact Human Resources to request and schedule an ASL interpreter.

9. Bilingual employees are not Qualified Interpreters and therefore cannot provide Qualified Interpreter services.

VI. Applicability

This policy applies to all MPHD employees and contractors.

VII. Spoken Language Assistance Graphic



Please contact Human Resources via email to submit requests for an on-site interpreter.

For written translation requests, please email requests to: InterpreterServices@nashville.gov



TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964

La Ley

El título VI de la ley de derechos civiles de 1964 estipula que “Ninguna persona en los Estados Unidos, por razones de raza, color u origen nacional, quedará privada de participar en cualquier programa o actividad que reciba la asistencia financiera federal; tampoco se le negarán los beneficios a los mismos, ni será sometida a discriminación alguna con relación a ellos”.

El departamento metropolitano de salud pública (MPHD, por sus siglas en inglés) y el gobierno metropolitano de Nashville se comprometen a garantizar que el nivel y la calidad de los servicios de salud pública se brinden sin distinción de raza, color, nacionalidad, sexo, edad, discapacidad, religión, afección médica, estado civil u orientación sexual. Además, estamos comprometidos a promover la participación justa y total de todas las poblaciones potencialmente afectadas y en prevenir la negación, la reducción o el retraso en los beneficios relacionados con los programas y actividades que afectan a las poblaciones minoritarias y de bajos ingresos; y proporcionar acceso significativo a los servicios, programas y actividades de MPHD para personas con dominio limitado del inglés.

Aplicabilidad

El título VI cubre a todas las agencias que reciben fondos federales. Los siguientes son algunos ejemplos: ayuda financiera para los estudiantes; programas de capacitación para los empleados; subvenciones; préstamos a personal laboral; programas de incentivo para reducir impuestos y asistencia técnica.

El título VI es aplicable a la discriminación en la totalidad de la agencia y no se limita sólo a hechos que involucren los programas de asistencia federal.

Presentación de queja

Las quejas relacionadas con el título VI que involucren a quienes reciban o sean beneficiarios de cualquier programa que acepte asistencia federal, podrán ser presentados por cualquier individuo, una clase o un tercero, ante el Coordinador del Título VI, dentro de los 90 días a partir de la fecha en que hubiere tenido lugar el supuesto acto de discriminación. Las quejas deben ser dirigidas a José Cruz, departamento de salud pública, 2500 Charlotte Avenue, Nashville, Tennessee 37209. Se puede comunicar con nuestro Coordinador por teléfono al **615.340.8963** si usted tiene alguna pregunta o queja con respecto al acatamiento del título VI en el departamento metropolitano de salud pública.

TITLE VI OF THE 1964 CIVIL RIGHT ACT

المادة رقم 6 من قانون الحقوق المدنية لعام 1964

القانون

تقتضى المادة رقم 6 من قانون الحقوق المدنية لعام 1964 أن "لا يتم استبعاد أي شخص في الولايات المتحدة ، على أساس العرق أو اللون أو الأصل القومي من المشاركة في أو الحرمان من مزايا أو التعرض للتمييز و ذلك فيما يخص أي برنامج أو نشاط يتلقى مساعدة مالية فيدرالية".

يلتزم مترو ناشفيل وقطاع الصحة العامة بمترو بضمان توفير خدمات الصحة العامة بكفاءة ومستوى لائق دون أى اعتبار للعرق أو اللون أو الأصل القومي أو الجنس أو السن أو الإعاقة أو الدين أو الحالة الطبية أو الحالة الاجتماعية أو التوجه الجنسي. ونحن ملتزمون كذلك بتعزيز المشاركة الكاملة والعادلة لجميع السكان الذين من المحتمل أن يكونوا متضررين ؛ وفي تجنب رفض أو تقليل أو تأخير المنافع المتعلقة بالبرامج والأنشطة التي تؤثر على الأقليات وذوي الدخل المنخفض. وتوفير وصول مفيد إلى خدمات وبرامج ونشاطات قطاع الصحة بمترو بناشفل (MPHD) من قبل الأشخاص ذوي الكفاءة المحدودة في اللغة الإنجليزية (LEP).

القابلية للتطبيق

تغطي المادة رقم 6 جميع المؤسسات التي تتلقى أموالاً فيدرالية. بعض الأمثلة تشمل: مساعدة الطلاب وتدريب الموظفين و المنح و ملكية القروض و القروض الخاصة والحوافز الضريبية والمساعدة الفنية.

تنطبق المادة رقم 6 على التمييز بجميع المؤسسات ، وليس فقط على النشاطات التي لها علاقة ببرامج تتلقى مساعدة فيدرالية.

تقديم شكوى

يجوز للمتلقين والمستفيدين من الخدمات تقديم الشكاوى المتعلقة بالمادة رقم 6 ، يمكن تقديم الشكاوى من قبل فرد أو فئة أو طرف ثالث إلى منسق المادة رقم 6، وذلك في غضون 90 يومًا من تاريخ الفعل التمييزي المزعوم. يجب توجيه الشكاوى إلى:

Jose Cruz
Metro Public Health Department
2500 Charlotte Avenue
Nashville TN 37209

ويمكن أيضا التواصل مع منسق المادة رقم 6 عبر الهاتف التالي : 615.340.8963 ، في حالة إذا ما كان لديك أية أسئلة أو شكاوى تتعلق بإمتثال قطاع الصحة بمترو للمادة رقم 6.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Historical Commission Year: 2025

Title VI Coordinator: Summers, Dustin Glen

Form Completed By: Summers, Dustin Glen

Form Completion Date: 5/23/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☐ Yes ☒ No *Due to the small size/nature of our department's operations, we rarely/never have Title VI matters to address. Employees will be trained on a case-by-case basis, if needed with any information and/or materials to be translated into the needed/required language by department's Title VI Coordinator.

If so, how is the training provided?

If needed, the training/source material will be provided through recommended MHRC sources/guidelines.

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

Via posted information in common area/on HR notice board.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Via posted information in common area/on HR notice board.

Do you provide this in languages other than English?

☒ Yes (Spanish) ☐ No

Title VI Complaint Procedure

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

☐ Yes ☒ No *being a smaller department, the Title VI coordinator and the Director would present/consult with the MHRC and Metro HR, if needed.

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

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

☒ Yes ☐ No

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

☒ Posted Signs Via posted information in common area/on HR notice board. ☒ Website Metro.gov’s Title VI page

☐ Other

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

☒ Yes *we would have procedure translated into whatever language was needed via preferred/requested translation method. ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes *digitally via secure shared network drive. ☐ No

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

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

*Due to the small size/nature of our department’s operations, we rarely/never have Title VI matters to address. Employees will be trained on a case-by-case basis, if needed with any information and/or materials to be translated into the needed/required language by department’s Title VI Coordinator.

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

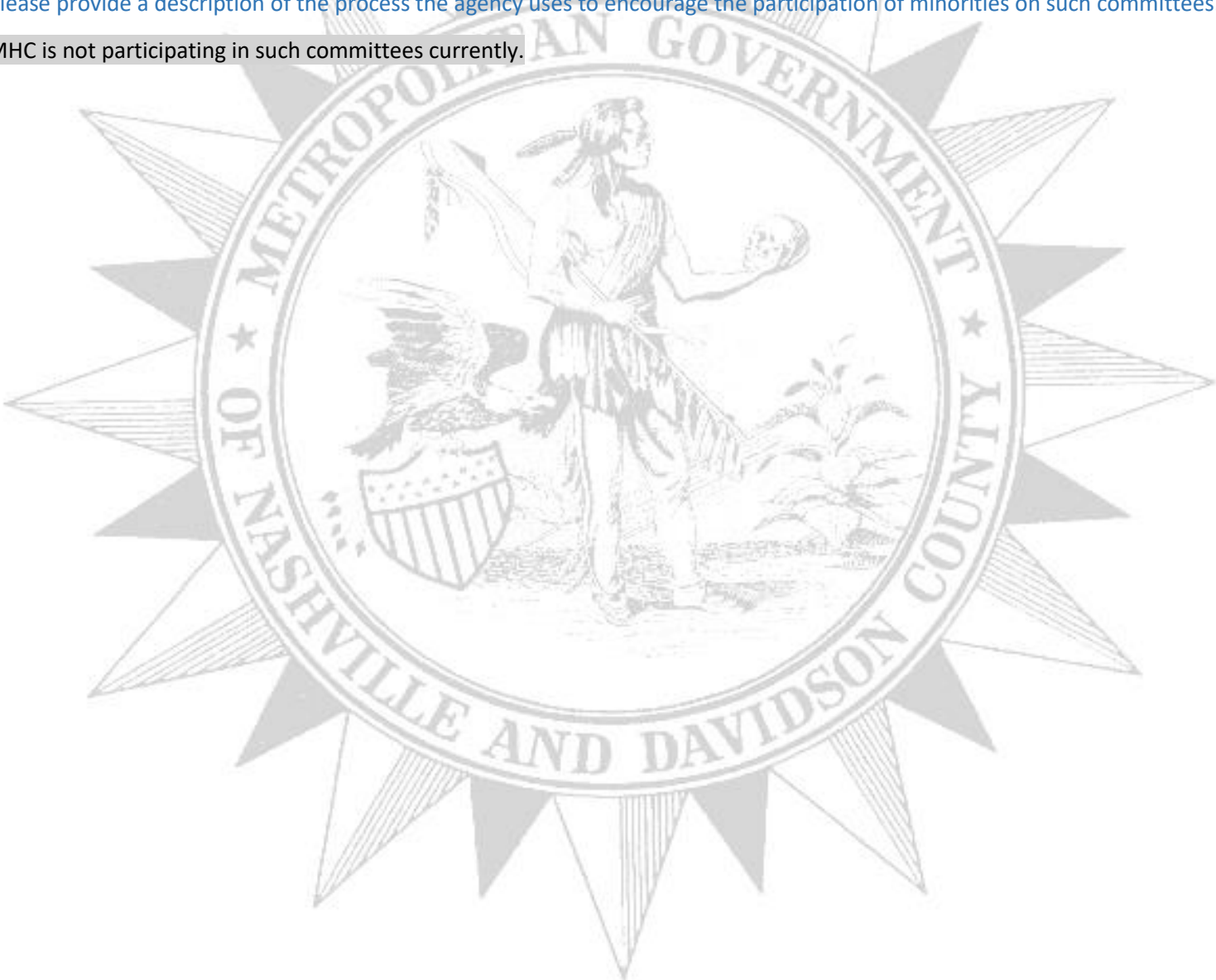
If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race

	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

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

MHC is not participating in such committees currently.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Human Relations Commission Year: 2025

Title VI Coordinator: Daniel Yoon Form Completed By: Daniel Yoon

Form Completion Date: 6/23/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

In Person

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

Online, in-person, flyers and onboarding.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Social media and website.

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Posted Signs ☒ Website☐ Other

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

☒ Yes ☐ No

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

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 43

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes☒ No

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

N/A

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes☒ No

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

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.
Mayor and Metro Council-appointed.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Human Resources Year: 2025

Title VI Coordinator: Razel Jones Form Completed By: Razel Jones

Form Completion Date: 5/19/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Online

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Verbally at a monthly department meeting, with follow-up information/coaching available through our Workforce Diversity & Culture and Employee Relations divisions.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:
Department breakroom and website

Do you provide this in languages other than English?

☐ Yes ☒ No

Title VI Complaint Procedure

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

☐ Yes ☒ No

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

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

☒ Yes ☐ No

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

☐ Posted Signs ☒ Website

☐ Other

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

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

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

☒ Yes, for the HR department ☐ No

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

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

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

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes ☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

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

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



LIMITED ENGLISH PROFICIENCY (LEP) DEPARTMENT LANGUAGE ACCESS PLAN METROPOLITAN GOVERNMENT OF NASHVILLE & DAVIDSON COUNTY HUMAN RESOURCES DEPARTMENT

The Metropolitan Government of Nashville and Davidson County (Metro) Human Resources (HR) department will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our opportunities, services, activities, and programs. The practice of Metro is to ensure meaningful communication with persons who experience LEP and their authorized representatives, as well as providing for communication of information contained in vital documents. Metro HR will provide all interpreters, translators, and other aids needed to comply with this policy without cost to persons accessing services.

Metro Human Relations and Finance departments have provided Metro Human Resources with a list of companies Metro has contracted with to provide oral and written translation services.

HR has selected *LanguageLine Solutions* as our department's preferred vendor.

FOR LANGUAGE INTERPRETIVE SERVICE:

If not immediately identifiable, use the *Language Identification Guide* to identify the language for interpretation (See *Language Identification Guide*); and contact our contracted service provider: *LanguageLine Services*: call 1-800-878-8523 and follow the voice command prompts, which will include a request to provide an account number and an access code. If the employee does not know the appropriate account number and access code, the person should contact the Workforce Diversity or Employee Relations divisions of Human Resources for the information.

DEPARTMENT/DIVISION	CONTACT
HR/Workforce Diversity	Razel Jones, HR Workforce Diversity & Culture Manager 615.862.6162
HR/Employee Relations	Stephen Cain, HR Employee Relations Manager 615.862.6464

FOR DOCUMENT TRANSLATION & OTHER QUESTIONS:

Contact the Workforce Diversity & Culture or Employee Relations divisions of HR for assistance with accessing document translation services and other questions related to the Language Access Plan.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Information Technology Services Year: 2025

Title VI Coordinator: Leslie Ervin Form Completed By: Leslie Ervin

Form Completion Date: 5/22/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Included in Employee Handbook which each new employee is required to read and sign acknowledgement upon completion.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Provide posters in visible areas where employees gather, include in Employee Handbook, and post on internal SharePoint under policies and resources.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

[illegible]

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

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☒ Yes ☐ No

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

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

☐ Yes ☒ No[illegible]

	Select an Item

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



Metro Nashville



@Your Service

Limited English Proficiency Plan

INFORMATION TECHNOLOGY SERVICES

MAY 2024

Title VI – Limited English Proficiency Plan

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Title VI – Limited English Proficiency Plan

INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the Metropolitan Government of Nashville and Davidson County Information Technology Services (ITS) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

PLAN SUMMARY

ITS has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

The mission of ITS is to lead the delivery of exceptional technology, service, and solutions. This mission is accomplished by delivering equitable technology solutions, resilient and secure infrastructures, and actionable data insights that help Metro Government enhance the lives and experiences of residents and visitors. Our digital inclusion goals exist to ensure everyone can access, afford, and use technology to achieve all the benefits it can offer. ITS recognizes that providing meaningful language access is a critical function toward building digital equity.

ITS has a plan based on the Four Factor Analysis that defines what action and reasonable steps the department will take when someone is identified with a limited English proficiency (LEP).

FACTOR 1: Number or Proportion of LEP Persons Eligible to be Served or Likely Encountered by the Program

According to the 2023 Census Data (source), estimated Davidson County had a total population of 663,438 residents. Among them, 70,039 individuals (approximately **10.06%**) reported speaking English “less than very well” and are classified as LEP. Spanish (64%), Arabic (9%), and Other Asian and Pacific Island (8%) speakers constitute the largest LEP populations in Davidson County.ⁱ

FACTOR 2: Frequency with Which LEP Individuals Come in Contact with the Program

ITS staff reviewed the frequency with which office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, ITS has had no requests for interpreters and no requests for translated program documents. ITS office staff have had very little contact with LEP persons.

FACTOR 3: The Nature and Importance of the Program, Activity, or Services Provided

Technology touches every part of daily life. We use technology to learn, work, obtain social and healthcare services, and maintain contact with loved ones. In their *Healthy People 2030* agenda, the U.S. Department of Health and Human Services talks about “the conditions in the environments where people are born, live, learn, work, play, worship, and age.” These conditions are known as Social Determinants of Health because they play a part in long-term health outcomes.ⁱⁱ Because technology is an underpinning to these factors, it plays a major role in the quality of a person’s life. Our digital inclusion goals exist to make sure that everyone can access, afford, and use technology to achieve all the benefits that it can offer and achieve the best health outcomes possible.ⁱⁱⁱ

For non-English speakers, having access to a translation service facilitates effective communication and enables individuals to maximize the benefits and opportunities of technology. ITS Staff is most likely to encounter LEP individuals through phone conversations and written correspondence.

FACTOR 4: The Resources Available to Recipient and Costs

ITS relies on telephonic interpretation and document translation service through Language Line Solutions with over 20,000 interpreters speaking 240+ languages including the languages most often spoken by Davidson County LEP residents.

Pricing varies by activity however the 2024 pricing for telephonic interpretation is \$1.05 per minute with the cost being absorbed by ITS and not passed along to the public.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the digital inclusion services. Language assistance can include interpretation, which means oral or spoken

Title VI – Limited English Proficiency Plan

transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

There is a relatively low percentage of LEP individuals, that is, persons who speak English “not well” or “not at all,” however ITS will strive to offer the following measures:

1. ITS staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. Language interpretation and translation service will be accessed for 240+ languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire.
- Description of language assistance services offered to the public; in person and telephone
- Documentation of language assistance requests

TRANSLATION OF DOCUMENTS

ITS evaluated the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the small local LEP population, ITS does not have a formal outreach procedure in place. However, when and if the need arises for LEP outreach, ITS will consider the following option. When staff prepares a document, advertisement, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

ITS will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in Davidson County.

Updates will include:

Title VI – Limited English Proficiency Plan

- Determination of the current LEP population in Davidson County.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether ITS's financial resources are sufficient to fund language assistance resources needed.
- Determine whether ITS fully complies with the goals of this LEP Plan.

DISSEMINATION OF ITS LEP PLAN

ITS will provide an internet hyperlink on www.nashville.gov notifying LEP persons of the LEP Plan and how to access language services on applications and contracts.

Revision History

Version Number	Date	Changes
1.0	05/01/24	Initial Published Plan
2.0	05/23/24	Grammatical corrections & location of internet link for public.
3.0	05/15/25	Updated Davidson County Census Statistics

ⁱ Source: US Census Bureau (2023). Detailed Household Language by Household Limited English Speaking Status. American Community Survey, ACS 5-Year Estimated Detailed Tables, Table B16002. US Census Bureau (2023). Language Spoken at Home. American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601.

ⁱⁱ Healthy People 2030, U.S. Department of Health and Human Services, Office of Disease Prevention and Health Promotion. Retrieved [date graphic was accessed], from <https://health.gov/healthypeople/objectives-and-data/social-determinants-health>

ⁱⁱⁱ Sieck CJ, Sheon A, Ancker JS, Castek J, Callahan B, Siefer A. Digital inclusion as a social determinant of health. NPJ Digit Med. 2021 Mar 17;4(1):52. doi: 10.1038/s41746-021-00413-8. PMID: 33731887; PMCID: PMC7969595. From [Digital inclusion as a social determinant of health - PubMed \(nih.gov\)](#)

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Internal Audit Year: 2025

Title VI Coordinator: Bill Walker Form Completed By: Bill Walker

Form Completion Date: 5/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☐ Yes ☒ No

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

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

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

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

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

☐ Yes ☒ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

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

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

☒ Yes ☐ No☐ Posted Signs ☐ Website

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

[illegible]

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

☐ Yes ☒ No

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

☐ Yes ☒ No

Title VI does not apply to our office as we do not receive federal funds. Please let us know if this is not correct.

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

☐ Yes ☒ No[illegible]

	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Justice Integration Systems Year: 2025

Title VI Coordinator: Brandi Kyle Form Completed By: Brandi Kyle

Form Completion Date: 6/4/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Title VI training is discussed verbally as part of the New Hire process.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Yearly Annual report posted to the JIS website. -SharePoint in development.

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No☐ Posted Signs ☒ Website☐ Other

☐ Yes ☒ No

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

☐ Yes ☒ No

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

[illegible]

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Juvenile Court Year: 2025

Title VI Coordinator: Jessica Robertson Form Completed By: Jessica Robertson

Form Completion Date: 6/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Online video and survey used with Microsoft Forms and previously with the assistance of Metro Human Relations Commission. Title VI Coordinator is in the process of scheduling Lunch and Learn style training sessions for refresher trainings for staff.

☒ Not Provided

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

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

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

☒ Yes ☐ No

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

Employee Enhancement Manual on the Juvenile Court Intranet

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

Title VI Complaint Procedure

☐ Yes ☒ No

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

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

☐ Other

☐ Yes ☐ No

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

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

Date	Status	Action Taken	Summary

[illegible]

Monitoring Subrecipients

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

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

☒ Yes

☐ No

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

Recipients have an opportunity to complete online training and submit interim and annual reports to the Grant Coordinators.

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☒ Yes

☐ No

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

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

Minority Representation on Planning or Advisory Bodies

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

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

☒ Yes

☐ No

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

Name	Race
Allen, Paula	Caucasian/White
Anthony, Adam	African American/Black
Bonnyman, Claudia	Caucasian/White
Bowers, Tinita	African American/Black
Brandes, Teresa	Asian
Brazelton, Jewel	African American/Black
Broadwater, Deborah	African American/Black
Caldwell, Constance	African American/Black
Cantrell, Valerie	Caucasian/White
Carr, Khalil	African American/Black
Chamberlain, Clementine	African American/Black
Cunningham, Tamieka	African American/Black

Dardy, Karen	African American/Black
Daughty, Susan	Caucasian/White
Deandrea, Alicia	Caucasian/White
Eubanks, Deborah	African American/Black
Gish, Susan	Caucasian/White
Goldsmith, Karen	Caucasian/White
Grafton, Laurie	Caucasian/White
Hampton, Carlatina	African American/Black
Hill, Amy	Caucasian/White
Johnston, Mary	Caucasian/White
Kemp, Max	Caucasian/White
Kimbrough, Erica	African American/Black
Kuhlman, Maggie	Caucasian/White
Lee, Cynthia	African American/Black
Lee, Rebecca	Caucasian/White
Lyford, Rebecca	Caucasian/White
Maumus, Isabelle	Caucasian/White
McDonald, Claire	Caucasian/White
McKinley, Mafia	African American/Black
McNamee, Barbara	Caucasian/White
Nixon, Joan	African American/Black
Nixon, Shanique	African American/Black
Orr, Carolyn	Caucasian/White
Overlock, Marc	Caucasian/White
Parker, Julia	African American/Black
Parra, Jessica	Caucasian/White
Parsons, Eileen	Caucasian/White
Peacock, Sandra	Caucasian/White
Phillips, Libby	Caucasian/White
Raketic, Milena	Caucasian/White
Raulston, Gilbert	Caucasian/White
Rochelle, Sandra	Caucasian/White
Rotella, Julie	Caucasian/White
Rush, Ricky	African American/Black
Schafly, Carol	Caucasian/White
Shackleford, Kara	Caucasian/White
Targino, Vanessa	Hispanic/Latino
Terrell, Kimberly	African American/Black
Thomas, Per	Caucasian/White
Thurman, Misty	Caucasian/White
Triplett, Carla	Caucasian/White
Tucker, Carla	African American/Black
Turner-Friley, Sharon	African American/Black
Vastano, Darlene	Caucasian/White
Viventi, Jane	Unknown/Not Specified
Webster, Suzette	African American/Black
West, Anne	Caucasian/White

Whitfield, Zanira	African American/Black
Wilkins, Jim	Caucasian/White
Williams, Melissa	Caucasian/White
Williams, Robert	African American/Black
Wilson, Molly	Caucasian/White

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

Employees are selected for operational committees which receive local funding based on job duties and responsibilities. It is unclear if these committees receive federal funding.

List provided above are Volunteers for Foster Care Review Board are selected by completing an online application. Once they have completed a criminal background check, signed an Oath of Confidentiality and completed the training process, the are assigned to review boards to hear cases.





Davidson County Juvenile Court

Juvenile Justice Center Limited English Proficiency (LEP) Language Services Program Operations Manual

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PURPOSE OF LEP PROGRAM

The Juvenile Justice Limited English Proficiency (LEP) Language Services Program is designed to assist LEP individuals. The purpose of this manual is to inform on LEP language access services program operations in providing high quality and appropriate language services to LEP individuals, and to ensure programs, activities and services are accessible to and readily usable by individuals with disabilities.

JUVENILE COURT MISSION STATEMENT

Davidson County Juvenile Court's mission is to prevent problems, promote the positive potential in all people, and pursue fairness and hope.

LEP LANGUAGE SERVICES PROGRAM VISION STATEMENT

Davidson County Juvenile Court's Language Services Program strives to offer interpreting and translation services in whatever languages are needed to all its clients: parties appearing in court, judges and magistrates, attorneys of record, court personnel, agency employees, and other parties that may need them with the purpose of allowing equal access to comprehension as would be available for a native English speaker.

LEGAL BASIS FOR LEP SERVICES

FEDERAL:

- Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S. C. 2000d, (hereinafter Title VI), provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Department of Justice has created guidance to assist in the development of plans (See attached 67 Fed. Reg. 41, 464 Section VII) and programs to ensure that states are meeting the requirements of Title VI and are taking reasonable steps to ensure meaningful access to their programs and activities by LEP persons" 67 Fed. Reg. 41,459 (June 18, 2002). Prohibits discrimination on the basis of race, color, or national origin, including limited English proficiency.
- Section 504 of the Rehabilitation Act of 1973, as amended, prohibits discrimination on the basis of disability in both employment and the delivery of services or benefits by recipients of federal financial assistance.
- Title II of the Americans with Disabilities Act (ADA), as amended, prohibits discrimination on the basis of disability in both employment and the delivery of services or benefits by public entities. It applies to all state and local government agencies and offers protections similar to Section 504. Title II of the ADA

Davidson County Juvenile Justice Center LEP Language Services Program Operations Manual

applies to all state and local government agencies, whether or not they receive Federal financial assistance.

- 28CFR42.104(b)(2) requires all recipients of Federal financial assistance from DOJ to provide meaningful access to LEP persons.

STATE OF TENNESSEE:

- Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.
- Tennessee Supreme Court Rule 42: Standards for Court Interpreters. *This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the judicial system. This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand the English language.*
- T. C. A.¹§24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings.
- Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000)²

BENEFITS OF THE LEP PROGRAM

The Juvenile Court LEP Language Access Services program provides individuals, who are Deaf, hard-of-hearing, blind, do not speak English as their primary language; and have a limited ability to read, speak, write, or understand English, meaningful access to vital documents and interpretation services free of charge.

LEP GRIEVANCE PROCEDURES

Constituents may call the Juvenile Court ADA Coordinator at 615-880-2376.

VITAL DOCUMENTS

Vital documents are routinely reviewed by the Juvenile Court Resiliency Committee.

¹ Rule 41: States in part...*Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier.*

² Executive order 13166: Improving Access to Services for Persons with Limited English Proficiency states in part... *recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.*

DEMOGRAPHIC HIGHLIGHT

STATEWIDE:

Data from the U.S. Census Bureau reveals that in Tennessee 6.8% of families and other living arrangements speak a language other than English in their household. According to the Tennessee Administrative Office of the Courts Court Interpreter Program which tracks court interpreter usage, the most widely used language for interpreters in Tennessee court in 2017 were (in descending order of usage):

1. Spanish
2. Arabic
3. Other

US CENSUS, AMERICAN COMMUNITY SURVEY, 2018, 1-YEAR ESTIMATES

2019:

Speaks English less than very well: 9.3%

Speaks Language other than English 18.8%

A study by the Metro Human Relations Commission (Metro Language Access Study) surveyed Metro departments and local organization about the linguistic minority communities with whom they typically interact. The most common non-English languages reported in the study are:

1. Spanish
2. Arabic
3. Kurdish
4. Burmese
5. Somali
6. Vietnamese
7. Nepali

DAVIDSON COUNTY JUVENILE COURT:

The most widely used language for interpreters in the Davidson County Juvenile Court in 2019 were (in descending order of usage):

1. Spanish
2. Arabic
3. Somali
4. Swahili
5. Kinyarwanda
6. Other: French, Nepali, Farsi.

ROLES OF INTEPRETER COORDINATOR

Roles of the certified Davidson County Juvenile Court Language Services Coordinator include the following:

- Provide interpreting services for the courts, petitioners, respondents, witnesses, attorneys, and other parties during court appearances, attorney-client meetings, and other communications by order of the Judicial Officers.
- Provide translations of court orders, procedures, attorney and client letters, statements, etc., related to court cases.
- Coordinate and facilitate the provision of language access services for Languages Other Than Spanish (LOTS) and Spanish where there is a need for more than one Spanish interpreter at a time. This includes locating interpreters for LOTS and, in cases where travel is needed, helping coordinate approval and travel of the interpreters.
- Provide and remind Juvenile Court employees and attorneys about the procedures to request language services.

CODE OF ETHICS FOR COURT INTERPRETERS

All certified and registered interpreters are tested on ethics for court interpreters through the credentialing process. Regardless of an interpreters credentials, all court interpreters are expected to be familial with and follow the Code of Ethics as listed in Supreme Court Rule 41. (See Appendix).

LANGUAGE ASSISTANCE SERVICES

There are many ways a State court can provide language access. The Davidson County Juvenile Court is responsible for taking reasonable steps to ensure that LEP individuals have meaningful access to services outside the courtroom. These services range from translation, interpretation, interactions with bilingual staff and building signage. The Davidson County Juvenile Court has the following resources to help LEP individuals and court employees communicate with each other:

The Administrative Office of the Courts (AOC) has provided, and the Davidson County Juvenile Court has available for use, “bench cards” and “I Speak Cards” for judges and information cards for clerks’ offices. This information is available on the AOC website at this address: <http://tncourts.gov/programs/court-interpreters>

The Administrative Office of the Courts (AOC) has provided, and the Davidson County Juvenile Court has available for use, “Right to Interpreter” posters for use in clerks’ offices and courthouses. This information is available on the AOC website at this address: <http://tncourts.gov/programs/court-interpreters>

A. Interpretation

Interpretation is the unrehearsed transmission of a spoken message from one language to another. This type of interpretation may be done using an in-person interpreter, over-the-phone (OPI) Metro vendor, or by using video remote interpreting. The first step is to identify the language that is being spoken. Staff that has contact with the public should contact bilingual staff or use the "I Speak" cards found at: <http://tncourts.gov/programs/court-interpreters> to obtain assistance for LEP persons needing language assistance. The "I Speak" pages are posted in the Intake area of the courthouse. Employees have access to language access lines. Interpreter requests are submitted electronically to the official Juvenile Court Interpreter Group email: JuvenileCourtInterpreterRequests@jnsnashville.gov

Auxiliary Aids are provided at no additional cost to individuals with disabilities, where necessary, to ensure effective communication with individuals with hearing, vision or speech impairments. Auxiliary aids may include, but are not limited to, services or devices such as: qualified interpreters on-site or through video remote interpreting (VRI) services, note takers, assistive listening devices, television captioning and decoders, telecommunication products and systems, qualified readers, taped texts, Brailled materials, and large print materials.

B. Translation

The term "translate" refers to the process of transmitting the written word from one language to another. The court shall determine if it is reasonably necessary for documents to be translated as part of assuring adequate representation of an indigent party with LEP. Many forms have may have already been translated and can be found on the AOC website.

<https://www.tncourts.gov/programs/court-interpreters>

<http://www.tncourts.gov/programs/self-help-center/what-should-i-expect-court-video>

www.LEP.gov.

<https://www.nashville.gov/departments/human-relations/title-vi-metro-government/limited-english-proficiency>

C. Bilingual Staff

Bilingual staff can speak directly to the LEP person in their language. Bilingual staff can be helpful for communication at the clerk's counter or with security personnel. Court employees may be available to voluntarily assist in interpreting should a LEP individual require assistance. These employees may offer their services only if it does not interfere with their primary job duties and does not require a language level superior to their own. These employees are only permitted to provide legal assistance, not legal advice.

The following employees are bilingual and have agreed to interpret if needed:

- Davidson Morales, Juvenile Court Language Services Coordinator

D. Building Signage

Door and wall signs should be posted at the door of each courtroom clearly identifying that part of the building. In addition, directional wall signs, bilingual where appropriate, should be used in buildings where long corridors or confusing layouts indicate they would be useful. The court will work with the County Commission in obtainment of these types of resources.

LANGUAGE SERVICE PROVIDERS OTHER THAN JUVENILE COURT INTERPRETERS

Vendor	Services	Contact Name	Contact email	Contact Phone	Contract Number
Real Time Translation	Document Only	John Grove	jgrove@rttmobile.com	205-910-6929	453927
Language Line	OPI and Document	Joe Matthews	jmatthews@languageline.com	831-648-7140	453924
Voiance	All	Bill Martin	bmartin@voiance.com	866-742-9080 x 1708	453926
Language Training Center	In Person and document	Hayley Guest	hguest@ltcls.com	317-813-9790	453925
AllWorld	In Person and document		request@ALCINC.COM	301-881-8884	453928
Lingualinx	Document Only	Colleen Dempsey	CDempsey@lingualinx.com	518.388.9000 ext. 1014	453929
Bridges	Sign Language Interpretation	J. Eric Workman	eric@bridgesfordeafandhh.org	615-248-8828	411541

TRAINING PROGRAMS FOR STAFF, JUDGES AND OTHERS

The Administrative Office of the Courts for the State of Tennessee (AOC) continues to provide education programs and materials on the AOC interpreter program and online serves at clerks and judicial conferences. During the conferences, the AOC highlights the need for courts and clerks' offices to assist in this education and recruitment process. As needed, blast emails and communications on interpreter issues are sent to court staff from the Language Services Coordinator. In addition, The Metropolitan Government of Nashville and Davidson County Human Relations Commission and the Administrative Officer of the Courts (AOC) for the State of Tennessee has Title VI training available on-line with testing materials for courts to take advantage of this training. AOC Title VI information can be found on the AOC's Human Resources webpage at this address:

<http://tncourts.gov/administration/human-resources/title-vi-title-ix>

The AOC has provided informational cards for judges and clerks on finding interpreters and a short online video can be watched by staff called "Breaking Down the Language Barrier," a video training tool provided by the Department of Justice." <http://www.youtube.com/watch?v=qaVKy-2HWIo&feature=related>

The Juvenile court Language Services Coordinator issues email blasts to staff regarding how to access interpreters and provides training for staff.

APPOINTING AN INTERPRETER

A. Supreme Court Rule 42

Tennessee Supreme Court Rule 42 Section 3 dictates that appointing an interpreter is a matter of judicial discretion and that it is the responsibility of the court to determine whether a participant in a legal proceeding has a limited ability to understand and communicate in English. The court shall appoint an interpreter according to the preference listed below.

1. State certified court interpreter
2. State registered court interpreter
3. Non-credentialed court interpreter

B. Finding a Credentialed Court Interpreter

If the court needs to appoint an interpreter, the AOC has posted all credentialed interpreters on its website at this address: <http://www.tncourts.gov/programs/court-interpreters/find-court-interpreter>. Interpreter services are scheduled as determined by local rules or at the direction of the court.

DAVIDSON COUNTY JUVENILE COURT LANGUAGE SERVICES SCHEDULER

Kathy Hardiman
100 Woodland Street
PO Box 196306
Nashville, TN
37219-6306

DAVIDSON COUNTY JUVENILE COURT LANGUAGE SERVICES COORDINATOR

David Morales, CCI

Language Services Coordinator
Juvenile Court
Metropolitan Nashville and [Davidson County](#)
[100 Woodland St.](#)
[Nashville, TN 37213](#)
T +1 (615) 862-8064
C +1 (615) 490-5968
DavidMorales@jjsnashville.gov
juvenilecourt.nashville.gov

STATE CONTACT

The Tennessee Judicial System is committed to providing accurate and impartial interpreting services to court users who need language assistance. Questions relating to interpreters may be directed to the Tennessee Office of the Courts.

Ryan Mouser

Language Access Program Manager
Administrative Office of the Courts
Nashville City Center, Suite 600
511 Union Street
Nashville, Tennessee 37219
(615) 741-26847
(800) 4484-7970
Ryan.mouser@tncourts.gov

CIVIL RIGHTS DIVISION CONTACT

Civil Rights Division

(202)514-3847

Telephone Device for the Deaf (TTY) (202) 514-0716

PROGRAM GOALS, OBJECTIVES, AND ACTIVITIES

Program success is defined by the following goals, objectives, and activities. These inform strategic planning and program improvements.

Goal: 100% of LEP clients will receive LEP Language Services as identified.

Objective 1.1: Schedule interpreting and translation services.

Activity 1.1: Provided needed interpreting and translation services

PROGRAM OUTPUTS

Program outputs are products of program activities and process measures that provide indicators of implementation.

1. Number of interpretations provided.
2. Type and number of language services provided.

PROGRAM OUTCOME MEASURES

Used to measure achievement of objectives and progress toward goals.

PROGRAM REPORTS

Reporting is issued for the Interpreter Services program.

Reporting includes the following:

- a) Data summaries.
- b) Outcome measures.
- c) Demographic characteristics of involved families:
 - a) Language service required
 - i. Deaf, hard-of-hearing
 - ii. Blind
 - iii. LEP

b) Zip code.

EVALUATION

This operations manual is reviewed annually by the Appointed Authority or authorized designee.

APPENDIX

INTERPRETER PROGRAM OPERATIONS POLICY

	<u>Team</u> Language Services <u>Program</u> LEP Language Services Program	<u>Subject</u> LEP 1.1: LEP Language Services Program Operations Policy	<u>Effective Date</u>
<u>Appointing Authority</u> Sheila D.J. Calloway, Judge	<u>Approved Date</u> <u>Approved By</u> Jim Swack, Deputy Court Administrator	<u>Related Standards</u> Juvenile Court Departmental Policy: 1.3: Development and Revision of Policy and Rules; Metro human Relations Commission's Metro Language Access Guide; Administrative Office of the Courts (AOC) Court Interpreters	<u>Revised Date</u>

PURPOSE:

To establish policy and procedural guidelines for operating the Davidson County Juvenile Court Limited English Proficiency (LEP) Language Services program.

DEFINITIONS:

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

Interpretation: Spoken rendition based on an individual's oral account. The result is the oral rendition in the target language.

Language Services Coordinator: Coordinates interpreter services for Spanish and other languages, to provide all individuals with equal access to court services.

LEP Language Services Program: This program provides direct Spanish interpreter services for Limited English Proficiency (LEP) client, and also coordinates non-Spanish interpreter services. This service is provided in partnership with the Administrative Office of the Court (AOC).

Limited English Proficiency (LEP): A person who cannot speak or understand English as their primary language and who have a limited ability to read, write, speak or understand the English language.

POLICY:

The Juvenile Court Limited English Proficiency (LEP) Language Services program provides individuals, who are Deaf, hard-of-hearing, blind, do not speak English as their primary language; and have a limited ability to read, speak, write, or understand English, meaningful access to vital documents, interpretation, and translation services free of charge. LEP services are a free program service that provides direct Spanish interpreter services for LEP clients, and also coordinates non-Spanish interpreter services for employees, attorneys, court partners, and Judicial Officers. This service is provided in partnership with the State of Tennessee Administrative Office of the Court (AOC). Clients have the right to end their participation at any time during their participation in a court service. Program outcome measures are maintained by the Language Services Coordinator. Program interaction is centered in a trauma-informed practice (See LEP 1.0: Promoting Trauma Informed Care Practices in LEP Language Services).

PROCEDURES:

1. The Juvenile Court Limited English Proficiency (LEP) Language Services program follows LEP practices established by the Davidson County Juvenile Justice Limited English Proficiency Language Services program manual. A copy of the program manual is incorporated into this policy.

REVIEW:

This policy is reviewed annually by the Appointing Authority or authorized designee.

FORMS:

None.

LEP LANGUAGE SERVICES PROGRAM TRAUMA-INFORMED CARE POLICY

[illegible]

PURPOSE:

To establish trauma-informed policy and practices for the Davidson County Juvenile Court LEP Language Services program.

DEFINITIONS:

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

Client: Any person appearing in court before a judge/magistrate or FCRB board, who does not speak English as their native tongue and requires the services of an interpreter, as well as the judge/magistrate and attorneys involved in the case, and staff involved in the case while in a court setting. This includes home and jail visits, and attorney-client meetings.

Emotional Safety: Clients are safe to express their feelings and emotions without being shamed or blamed.

Language Services Coordinator: Coordinates interpreter services for Spanish and other languages, to provide all individuals with equal access to court services.

LEP Language Services Program: This program provides direct Spanish interpreter services for Limited English Proficiency (LEP) client, and also coordinates non-Spanish interpreter services. This service is provided in partnership with the Administrative Office of the Court (AOC).

Limited English Proficiency (LEP): A person who cannot speak or understand, or has a limited ability to speak or understand the English language.

Physical Safety: Clients are physically safe and secure in their surroundings.

Psychological Safety: Clients are comfortable being themselves without fear of rejection.

Safety: Includes emotional safety, physical safety, and psychological safety.

Trauma-Informed Care Approach: Is a universal precaution that assumes everyone may have experienced trauma. This approach provides a space for healing to give back feelings lost in trauma; thereby, protects both Juvenile Court employees and clients alike.

POLICY:

Trauma-informed care practices shift the focus from “What’s wrong with you?” to “What happened to you?” Actively avoiding re-traumatization includes integrating a trauma-informed approach for employees, youth, and families. This approach includes, but is not limited to, creating a practice which realizes and understands the possible effects of trauma through relevant training; recognizing that past experiences influence present responses and actions; responding to employees and clients in a caring and trauma-informed manner; and, building resilience in those we interact with to avoid re-traumatizing. Language Services Program team members attend Juvenile Court approved trauma-informed care training as required.

1. It is the practice of the Language Services’ program to provide trauma-informed services to any person seeking and/or participating in services from the court, appearing in court before a judge/magistrate or Foster Care Review Board (FCRB), who does not speak English as their native tongue and requires the services of an interpreter.
2. Centering interpreter services in trust, transparency, cultural, historical, and gender awareness, includes, but is not limited to the following:
 - a) Build trust and transparency between the client and interpreter.
 - b) Provide accurate interpretations that represent family cultural, historical, and gender identity.

PROCEDURES:

1. The Language Services Coordinator promotes trauma-informed practice in the work environment by attending Juvenile Court approved trauma-informed care training.
2. The Language Services Coordinator builds trust and transparency with clients by:
 - a) Remaining impartial and honest when providing interpretation for everything that has been said for transparency.
 - b) Requesting and providing clarifications on what has been said for accuracy.
 - c) Abstaining from interjecting a personal opinion.
 - d) Respecting the attorney-client privilege for confidentiality.
 - e) Asking Judge/Magistrate for clarification and permission to explain cultural issues when the need arises.
3. The Language Services Coordinator values client cultural, historical, and gender identity by:
 - a) Being mindful and respectful of cultural contexts, customs and religious beliefs of clients.
 - b) Showing respect, kindness and patience to clients.
 - c) Understanding clients' use of primary, secondary regional dialects, and slang when communicating.
 - d) Remaining curious and open-minded to religious practices that may affect the perception of reality of the clients.
 - e) Addressing clients by their preferred name, including preferred pronouns.

REVIEW:

This policy is reviewed annually by the Appointing Authority or authorized designee.

FORMS:

None.

ACKNOWLEDGEMENTS:

Policy Committee

David Morales, Juvenile Court Language Services Coordinator
Shelley Hudson, Juvenile Court Special Projects Program Manager

Partner Peer Review

Robyn Price, VP Strategy and Community Resilience, The Family Center
Amy Cooper, Manager of Community Resilience, The Family Center

Administrative Review Committee

Kathy Sinback, Juvenile Court Administrator

Produced By

Shelley Hudson, Juvenile Court Special Projects Program Manager

JUVENILE COURT DEPARTMENTAL POLICY 2.23 INTERPRETER REQUESTS

	Chapter Departmental Business Practices	Title 2.23.1: Interpreter Requests	Effective Date 07/01/2018
Appointing Authority Sheila D.J. Calloway, Judge	Approved Date 07/01/2018 Approved By 	Related Standards Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts; Tennessee Supreme Court Rule 42: Standards for Interpreters; T. C. A. ³ §24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings; Executive Order 13166: Improving Access to Services for Persons With Limited English Proficiency (August 11, 2000) ⁴ ; Section 601 of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Person With Limited English Proficiency; Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act (ADA) as amended.	Revised Date 10/04/2021⁵

PURPOSE:

To establish policy and procedural guidelines for employees making an interpreter requests.

DEFINITIONS:

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

³ Rule 41: States in part...*Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier.*

⁴ Executive order 13166: Improving Access to Services for Persons with Limited English Proficiency states in part... *recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.*

⁵ **Revision Date: 10/04/2021.** Revisions: Includes the addition of Policy #1, #2; additions of term, “translation,” and updated Related Standards.

Consecutive Interpretation: Providing the target-language message after the speaker has finished speaking a sentence or phrase.

Deaf Person: A person with a hearing loss so great as to prevent such person from understanding language spoken in a normal tone. "Deaf person" further includes, but is not limited to, a person who is mute and a person who is both Deaf and mute.

Interpretation: Spoken rendition based on an individual's oral account. The result is the oral rendition in the target language.

Limited English Proficiency (LEP): A person who is not fluent in the English language, often because it is not their native language.

Oral Interpreter: A person who interprets language through facial and lip movements only and who does not use manual communication.⁶

Qualified Deaf Interpreter: An interpreter certified by the National Registry of Interpreters for the Deaf, Tennessee Registry of Interpreters for the Deaf, or, in the event an interpreter so certified is not available, an interpreter whose qualifications are otherwise determined. Efforts to obtain the services of a qualified interpreter certified with a Legal Skills Certificate or a Comprehensive Skills Certificate will be made prior to accepting services of an interpreter with lesser certification⁷.

Sight Translation: Oral translation of a written text.

Simultaneous Interpretation: Providing rendition of the target-language message at approximately the same time the source-language message is being produced.

Source Language: The input language requiring interpretation.

Target Language: The output language into which the utterance is being interpreted.

Translation: The term "translate" refers to the process of transmitting the written or spoken word from one language to another.

⁶ Tennessee Code Annotated. §24-1-211: *An oral interpreter shall be provided upon the request of a deaf person who does not communicate in sign language. The right of a deaf person to an interpreter may not be waived except by a deaf person who does not use sign language and who initiates such request for waiver in writing. Such waiver is subject to approval of counsel to such deaf person, if existent, and is subject to approval of the appointing authority.*

⁷ Ibid: *No "qualified interpreter" shall be appointed unless the appointing authority and the deaf person make a preliminary determination that the interpreter is able to readily communicate with the deaf person and is able to accurately interpret the statements of the deaf person and interpret the proceedings in which a deaf person may be involved.*

POLICY⁸:

The Davidson County Juvenile Court is responsible for taking reasonable steps to ensure that LEP individuals have meaningful access to services outside the courtroom. These services range from translation, interpretation, interactions with bilingual staff and building signage.

1. The Juvenile Court LEP Language Access Services program provides individuals, who are Deaf, hard-of-hearing, blind, do not speak English as their primary language; and have a limited ability to read, speak, write, or understand English, meaningful access to vital documents, interpretation, and translation services free of charge.
2. In any case in law of equity before the court, wherein any Deaf person is a party to such action, either as a complainant, defendant, or witness, the court may appoint a qualified sign language to interpret the proceedings to the Deaf person and interpret the person's testimony or statements and to assist in preparation with counsel⁹.
3. In any case in law of equity before the court, wherein any LEP person is a party to such action, either as a complainant, defendant, or witness, the court may appoint a qualified interpreter of language to interpret the proceedings to the LEP person and interpret the person's testimony or statements and to assist in preparation with counsel.
4. Interpreters for persons with Limited English Proficiency have as a duty to ensure that the proceedings in English reflect precisely what was said by the LEP person, and to place the LEP person on an equal footing with those who understand and speak English. This creates an obligation to conserve every element of information contained in a source language communication when it is rendered in the target language¹⁰.
5. Generally, hearings requiring two plus (2+) hours should require two interpreters.
6. Parties needing interpreting may waive the right to an interpreter.
7. Employees have access to language lines for interpretation services.

PROCEDURES:

1. Interpreter requests are submitted electronically to the official Juvenile Court Interpreter Group email.
2. Employees can access Over-the-phone (OPI) and video interpretation services.
3. Employees may seek the guidance of the Juvenile Court Language Services Coordinator for assistance.

⁸ This policy applies only to the Juvenile Court of Davidson County. The Metropolitan Government of Nashville and Davidson County Civil Service Rules, Section 1.10 - Departmental Rules, states in part... *Appointing authorities shall implement additional rules to govern their departments, specific rules which would apply to their departments only or are not covered in the Civil Service Rules.*

⁹ Tennessee Code Annotated §24-1-211.

¹⁰ Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreter in Tennessee Courts, Canon 1: Accuracy and Completeness.

REVIEW:

This policy is reviewed annually by the Appointing Authority or authorized designee.

FORMS:

None.

Revision:

10/04/2021	2.23.1 (.1) reflects a first revision. Added element #1 and #2 under Policy Section; Addition of Related Standards: Tennessee Supreme Court Rule 42: Standards for Interpreters; Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act (ADA) as amended. Addition of the term, "Translation" under the glossary section.

RULE 41: RULES OF ETHICS FOR SPOKEN FOREIGN LANGUAGE INTERPRETERS IN TENNESSEE COURTS

Preamble

Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency ("LEP"). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier. As officers of the court, interpreters help assure that such persons may enjoy equal access to justice and that court proceedings and court support services function efficiently and effectively. Interpreters are highly skilled professionals who fulfill an essential role in the administration of justice.

Applicability and Enforcement

This code shall guide and be binding upon all persons, agencies and organizations who administer, supervise use, deliver, or attempt to become credentialed to deliver spoken foreign language interpreting services to the judicial system. The Canons and any subparts are mandatory upon persons who are bound by this code. The commentary is not mandatory and exists to provide guidance in interpreting the code. Interpreters for the deaf and hard of hearing are not covered by this code. See Tenn. Code Ann. § 24-1-211 regarding guidelines for such interpreters.

Violations of this code may result in the interpreter being removed from a case, being denied future appointments by the courts, losing credentials if the interpreter has been credentialed pursuant to the rules of the Supreme Court, or any other sanctions deemed appropriate by the Administrative Director of the Courts.

The Administrative Director of the Courts is authorized to adopt policies and procedures necessary to enforce the code.

Terminology

- (1) **Consecutive Interpretation** - providing the target-language message after the speaker has finished speaking.
- (2) **Sight Translation** - oral translation of a written text.
- (3) **Simultaneous Interpretation** - providing the target-language message at approximately the same time the source-language message is being produced.
- (4) **Source Language** - the input language requiring interpretation.
- (5) **Target Language** - the output language into which the utterance is being interpreted.

CANON 1. Accuracy and Completeness

Interpreters shall render a complete and accurate interpretation or translation without altering, omitting, or adding anything to what is stated or written, and without explanation.

A. The interpreter has a twofold duty: 1) to ensure that the proceedings in English reflect precisely what was said by the LEP person, and 2) to place the LEP person on an equal footing with those who understand and speak English. This creates an obligation to conserve every element of information contained in a source language communication when it is rendered in the target language.

B. The obligation to preserve accuracy includes the interpreter's duty to correct any error of interpretation discovered by the interpreter during the proceeding. Interpreters shall demonstrate their professionalism by objectively analyzing any challenge to their performance.

Commentary.

Interpreters are obligated to apply their best skills and judgment to preserve faithfully the meaning of what is said in court, including the style or register of speech. Verbatim, "word for word," or literal oral interpretations are not appropriate when they distort the meaning of the source language, but every spoken statement, even if it appears non-responsive, obscene, rambling, or incoherent should be interpreted. This includes apparent misstatements.

Interpreters should never interject their own words, phrases, or expressions. If the need arises to explain an interpreting problem (e.g., a term or phrase with no direct equivalent in the target language or a misunderstanding that only the interpreter can clarify), the interpreter should ask the court's permission to provide an explanation. Interpreters should convey the emotional emphasis of the speaker without reenacting or mimicking the speaker's emotions or dramatic gestures.

CANON 2. Representation of Qualifications

Interpreters shall accurately and completely represent and document their credentials, training, and pertinent experience, and make such documentation available to each and every court to be maintained on file by such court, if desired.

Commentary.

Acceptance of a case by an interpreter is a representation to the court of linguistic competency in legal settings. Withdrawing or being asked to withdraw from a case after it begins causes a disruption of court proceedings and is wasteful of scarce public resources. It is therefore essential that interpreters present a complete and truthful account of their training, credentials and experience prior to appointment so the officers of the court can fairly evaluate their qualifications for delivering interpreting services.

The Administrative Office of the Courts distributes photo identification cards to all state certified and registered interpreters. A court can determine an interpreter's credentialing status by viewing this card, which differentiates between registered and certified interpreters, and by consulting the credentialed interpreter roster, which can be found on the AOC's website (www.tncourts.gov).

CANON 3. Impartiality and Avoidance of Conflict of Interest

Interpreters shall be impartial and unbiased and shall refrain from conduct that may give an appearance of bias. Interpreters shall disclose any real or perceived conflict of interest.

A. Any condition that interferes with the objectivity of an interpreter constitutes a conflict of interest. Before providing services in a matter, court interpreters shall disclose to all parties and presiding officials any prior involvement, whether personal or professional, that could be reasonably construed as a conflict of interest. Such disclosure(s) shall include, but not be limited to, the fact that the interpreter has previously been retained by one of the parties for private employment. Such disclosure(s) shall not include privileged or confidential information.

B. Whenever an interpreter has an actual or apparent conflict of interest, the interpreter shall declare in open court before appointment such conflict and the court shall determine whether the interpreter may serve in the case. Situations, including but not limited to the following, shall be presumed to create an actual or apparent conflict of interest:

(1) The interpreter is a friend, associate, or relative of a party or counsel for a party involved in the proceedings;

(2) The interpreter has served in an investigative capacity for any party involved in the case;

(3) The interpreter has previously been retained by a law enforcement agency or any party to assist in the preparation of the case at issue;

(4) The interpreter or the interpreter's spouse or child has a financial interest in the subject matter in controversy or is a party to the proceeding, or any other interest that would be affected by the outcome of the case;

(5) The interpreter has been involved in the choice of counsel or law firm for that case; or

(6) Any other situation in which the interpreter thinks his or her impartiality may be questioned or compromised.

C. Interpreters shall not serve in any matter in which payment for their services is contingent upon the outcome of the case.

Commentary.

The interpreter serves as an officer of the court and the interpreter's duty in a court proceeding is to serve the court and the public to which the court is a servant. This is true regardless of whether the interpreter is publicly retained at government expense or retained privately at the expense of one of the parties. Although an interpreter must disclose the fact that the interpreter interpreted for a party during out-of-court meetings, interviews, or other proceedings in the case at issue, ethical considerations do not preclude the interpreter from serving as the interpreter for multiple parties or for both the court and one or more parties in that case.

An individual who is, or may become, a witness is not permitted to serve as an interpreter in that same matter.

During the course of the proceedings, interpreters should not converse with parties, witnesses, jurors, attorneys, or with friends or relatives of any party, except in the discharge of their official functions. It is especially important that interpreters, who are often familiar with attorneys or other members of the courtroom work group, including law enforcement officers, refrain from casual and personal conversations with anyone in court that may convey an appearance of a special relationship or partiality to any of the court participants.

The interpreter should strive for professional detachment. Verbal and non-verbal displays of personal attitudes, prejudices, emotions, or opinions should be avoided at all times.

An interpreter who is also an attorney should not serve in both capacities in the same matter.

CANON 4. Professional Demeanor

Interpreters shall conduct themselves in a manner consistent with the dignity of the court and shall be as unobtrusive as possible.

Commentary.

Interpreters should know and observe the established protocol, rules, and procedures for delivering interpreting services. When interpreting testimony or making comments to be included in the record, interpreters should speak at a rate and volume that enable them to be heard and understood throughout the courtroom, but the interpreter's presence should otherwise be as unobtrusive as possible. Interpreters should work without drawing undue or inappropriate attention to themselves. Interpreters should dress in a manner that is consistent with the dignity of the proceedings of the court. Interpreters should avoid obstructing the view of any of the individuals involved in the proceedings.

Interpreters are encouraged to avoid personal or professional conduct that could discredit the court.

CANON 5. Confidentiality

Interpreters shall protect the confidentiality of all privileged and other confidential information.

Commentary.

The interpreter must protect and uphold the confidentiality of all privileged information obtained during the course of her or his duties. It is especially important that the interpreter understands and upholds the attorney-client privilege, which requires confidentiality with respect to any communication between attorney and client. It is equally important for the interpreter to be aware that when the attorney is not present, there is no attorney-client privilege and the interpreter may be held to divulge any information gained. The interpreter, therefore, must avoid any such situation. This rule also applies to other types of privileged communications.

Interpreters must also refrain from repeating or disclosing information obtained by them in the course of their employment that may be relevant to the legal proceeding.

In the event that an interpreter becomes aware of information that suggests the threat of imminent harm to someone or relates to a crime being committed during the course of the proceedings, the interpreter should immediately disclose the information to an appropriate authority within the judicial system and seek advice in regard to the potential conflict in professional responsibility.

CANON 6. Restriction of Public Comment

Interpreters shall not publicly discuss, report, or offer an opinion concerning a matter in which they are engaged, even when that information is not privileged or required by law to be confidential.

CANON 7. Scope of Practice

Interpreters shall limit themselves to interpreting or translating, and shall not give legal advice, express personal opinions to individuals for whom they are interpreting, or engage in any other activities which may be construed to constitute a service other than interpreting or translating while serving as an interpreter.

Commentary.

Since interpreters are responsible only for enabling others to communicate, they should limit themselves to the activity of interpreting or translating only. Interpreters should refrain from initiating communications while interpreting at all times except as set out below.

Interpreters may be required to initiate communications during a proceeding when they find it necessary to

seek assistance in performing their duties. Examples of such circumstances include seeking direction when unable to understand or express a word or thought, requesting speakers to moderate their rate of communication or repeat or rephrase something, correcting their own interpreting errors, or notifying the court of reservations about their ability to satisfy an assignment competently. In such instances they should refer to themselves in the third person as "the interpreter," making it clear and on the record that they are speaking for themselves.

At no time can an interpreter give advice, but an interpreter may interpret legal advice from an attorney to any party while that attorney is giving it. An interpreter should not explain the purpose of forms, services, or otherwise act as counselors or advisors. The interpreter may translate language on a form in the presence of an attorney or authorized legal personnel for a person who is filling out the form, but may not explain the form or its purpose for such a person.

The interpreter should not personally serve to perform official acts that are the official responsibility of other court officials including, but not limited to, court clerks, pretrial release investigators or interviewers, or probation officers, except as required by and in the presence of such officials.

CANON 8. Assessing and Reporting Impediments to Performance

Interpreters shall familiarize themselves as thoroughly as possible with the nature and length of a proceeding beforehand, to assess their ability to deliver adequate services. When interpreters have any reservation about their ability to satisfy an assignment competently, they shall immediately convey that reservation to the appropriate judicial authority even when the proceeding is in progress.

Commentary.

If the communication mode or language of the LEP person cannot be readily interpreted, the interpreter should notify the appropriate judicial authority.

Interpreters should notify the appropriate judicial authority of any environmental or physical limitation that impedes or hinders their ability to deliver interpreting services adequately (e.g., the court room is not quiet enough for the interpreter to hear or be heard by the LEP speaker, more than one person at a time is speaking, or principals or witnesses of the court are speaking at a rate of speed that is too rapid for the interpreter to adequately interpret).

Interpreters should notify the presiding officer of the need to take periodic breaks to maintain mental and physical alertness and prevent interpreter fatigue. Interpreters should recommend and encourage the use of team interpreting whenever necessary, such as trials, complex and technical proceedings, proceedings over two hours in length and testimony lasting one hour or more (keeping in mind that the consecutive interpreting mode doubles the length of time of the testimony). See the commentary to Section 3 of Tennessee Supreme

Court Rule 42 for additional information.

Interpreters are encouraged to make inquiries as to the nature of a case whenever possible before accepting an assignment. This enables interpreters to match more closely their professional qualifications, skills, and experience to potential assignments and more accurately assess their ability to satisfy those assignments competently.

Even competent and experienced interpreters may encounter cases where routine proceedings suddenly involve technical or specialized terminology unfamiliar to the interpreter (e.g., the unscheduled testimony of an expert witness). When such instances occur, interpreters should request a brief recess to familiarize themselves with the subject matter. If familiarity with the terminology requires extensive time or more intensive research, interpreters should inform the presiding officer.

Interpreters should refrain from accepting a case if they feel the language and subject matter of that case is likely to exceed their skills or capacities. Interpreters should feel no compunction about notifying the court if they feel unable to perform competently due to lack of familiarity with terminology, preparation, or difficulty in understanding a witness or defendant. Court personnel and parties are encouraged to provide interpreters with copies of all documents referred to in a proceeding, such as witness lists, indictment, exhibit lists, criminal complaint, investigative reports, tape transcripts, telephone logs and bank records.

Interpreters should notify the court of any personal bias they may have involving any aspect of the proceedings. For example, an interpreter who has been the victim of a sexual assault may wish to be excused from interpreting in cases involving similar offenses.

CANON 9. Misconduct

An interpreter shall not commit a criminal act that reflects adversely on the interpreter's honesty, trustworthiness, or fitness as an interpreter in other respects. Likewise, an interpreter shall not engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.

Commentary.

This language is intended to put interpreters on notice that inappropriate conduct before, during, and after successful completion of the credentialing process may have professional ramifications. The conduct at issue includes, but is not limited to, inappropriate behavior in which an interpreter engages during one or more of the required credentialing examinations.

CANON 10. Duty to Report Ethical Violations

Interpreters shall report to the proper judicial authority any effort to impede their compliance with any law, any provision of this code, or any other official policy governing court interpreting and legal translating.

Commentary.

Because the users of interpreting services frequently misunderstand the proper role of the interpreter, they may ask or expect the interpreter to perform duties or engage in activities that run counter to the provisions of this code or other laws, regulations, specific instructions from the bench, or policies governing court interpreters. It is incumbent upon the interpreter to inform such persons of his or her professional obligations. If, having been apprised of these obligations, the person persists in demanding that the interpreter violate them, the interpreter should request the judge or appropriate official with jurisdiction over interpreter matters to resolve the situation.

CANON 11. Professional Development

Interpreters shall continually improve their skills and knowledge and advance the profession through activities such as professional training and education, and interaction with colleagues and specialists in related fields.

Commentary.

Interpreters must continually strive to increase their knowledge of the languages in which they professionally interpret, including past and current trends in technical, vernacular, and regional terminology as well as their application within court proceedings.

Interpreters should keep informed of all statutes, rules of courts and policies of the judicial system that relate to the performance of their professional duties.

An interpreter should seek to elevate the standards of the profession through participation in workshops, professional meetings, interaction with colleagues, and reading current literature in the field.

CANON 12. Pro Bono Publico Service.

Interpreters should aspire to render a reasonable amount of pro bono publico interpretive services per year. In fulfilling this responsibility, interpreters should:

- (a) provide a substantial portion of such services without fee or expectation of fee to persons of limited means; or
- (b) provide interpretive services at a substantially reduced fee to persons of limited means.

Commentary.

Personal involvement in the problems of the disadvantaged can be a rewarding experience in the life of an interpreter. This Canon urges all interpreters to provide a reasonable number of hours of pro bono service annually.

Under paragraph (a), service must be provided without fee or expectation of fee. The intent of the interpreter to render free services is essential for the work performed to fall within the meaning of paragraph (a); accordingly, services rendered cannot be considered pro bono if an anticipated fee is uncollected. Paragraph

(b) permits the pro bono interpreter to accept a substantially reduced fee for services to persons of limited means; again, however, the intent of the interpreter to render reduced-fee services is essential for the work performed to fall within the meaning of paragraph (b); accordingly, services rendered cannot be considered pro bono if an anticipated fee is uncollected.

Because this Canon states an aspiration rather than a mandatory ethical duty, it is not intended to be enforced through disciplinary process.

[Adopted by order filed April 25, 2002; amended by order filed April 27, 2005; and amended by order filed December 16, 2011, effective July 1, 2012.]

RULE 42: STANDARDS FOR COURT INTERPRETERS

Section 1. Scope

This rule, except where noted, shall apply to all courts in this state, including without limitation, municipal court, general sessions court, juvenile court, probate court, circuit court, chancery court, criminal court, and appellate court.

Commentary

This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak, and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the judicial system.

This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand the English language.

Section 2. Definitions

(1) State Certified Court Interpreter - an interpreter who possesses the qualifications outlined in Section 5(b) of this rule.

(2) State Registered Court Interpreter - an interpreter who possesses the qualifications outlined in Section 5(a) of this rule.

(3) Interpretation - the unrehearsed transmission of a spoken message from one language to another.

(4) Limited English Proficient ("LEP") Person - a participant in a legal proceeding who has limited ability to speak or understand the English language.

(5) Non-Credentialed Interpreter - a court interpreter who is not certified or registered as provided in this rule.

(6) Participant - a party, witness, or other person in a legal proceeding.

(7) Sight Translation - oral translation of a written text.

(8) Written Translation - the rendering of a written document from one language into a written document in another language.

(9) Audio or Video Transcription and Translation - written transcription of the entire verbal content and translation of the non-English verbal content of an audio or video recording.

(10) Court Proceedings - any hearing, trial, or other appearance before any Tennessee general sessions court, or municipal court exercising general sessions jurisdiction, or any juvenile, probate, circuit, chancery, criminal, or appellate court, in an action, appeal, or other proceeding, including any matter conducted by a judicial magistrate.

(11) Indigent Party - a party found by a court to be indigent pursuant to the provisions of Tennessee Code Annotated section 40- 14-202 or other applicable statute, which finding shall be evidenced by a court order.

Section 3. Determining Need for Interpretation

(a) Appointing an interpreter is a matter of judicial discretion. It is the responsibility of the court to determine whether a participant in a legal proceeding has a limited ability to understand and communicate in English. If the court determines that a participant has such limited ability, the court should appoint an interpreter pursuant to this rule.

(b) Recognition of the need for an interpreter may arise from a request by a party or counsel, the court's own voir dire of a party or witness, or disclosures made to the court by parties, counsel, court employees or other persons familiar with the ability of the person to understand and communicate in English.

(c) The court shall appoint an interpreter according to the preference listed below:

1. State certified court interpreter;
2. State registered court interpreter;
3. Non-credentialed court interpreter.

(d) The court may appoint an interpreter of lesser preference (i.e., registered instead of certified or non-credentialed instead of registered) only upon a finding that diligent, good faith efforts to obtain the certified or registered interpreter, as the case may be, have been made and none has been found to be reasonably available. A non-credentialed interpreter may be appointed only after the court has evaluated the totality of the circumstances including the gravity of the judicial proceeding and the potential penalty or consequence involved.

(e) Before appointing a non-credentialed interpreter, the court shall make the following findings:

(i) that the proposed interpreter appears to have adequate language skills, knowledge of interpreting techniques, familiarity with interpreting in a court setting; and

(ii) that the proposed interpreter has read, understands, and will abide by the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

(f) A summary of the efforts made to obtain a certified or registered interpreter and to determine the capabilities of the proposed non-credentialed interpreter should be made in open court.

(g) The court shall use the services of multiple interpreters where necessary to aid interpretation of court proceedings.

Commentary.

The Administrative Office of the Courts distributes photo identification cards to all state certified and registered interpreters. A court can determine an interpreter's credentialing status by viewing this card, which differentiates between registered and certified interpreters, and by consulting the credentialed interpreter roster, which can be found on the AOC's website (www.tncourts.gov).

Section 3(g). The court may wish to consider using multiple interpreters in legal proceedings where one or more of the following situations exist:

(1) Legal proceedings lasting more than 2 hours--Generally, in legal proceedings lasting more than two hours a team of two interpreters should be designated to ensure the accuracy and completeness of the record by allowing interpreters to alternate work and rest in short shifts, thus avoiding fatigue. Although it may not be necessary to use multiple interpreters for short hearings, studies have shown that interpreters' accuracy rates greatly decrease after 20-30 minutes of continuous interpretation. Therefore, courts should be aware that interpreters may need breaks during relatively short hearings.

(2) Multiple defendants--One or more interpreters may be appointed (apart from the interpreter(s) who are interpreting the legal proceedings) in order to provide interpreting services for attorney-client communications during the proceeding. However, courts should be aware that ethical considerations do not preclude interpreters from facilitating in-court and out-of-court communication for both the court and one or more parties in the same proceeding. Moreover, the Administrative Office of the Courts has provided many courts with simultaneous interpreting equipment, which will allow one interpreter to interpret for multiple defendants during a single proceeding.

See the commentary to Canon 8 of Tennessee Supreme Court Rule 41 for additional information regarding circumstances in which it may be advisable to use multiple interpreters.

Section 4. Procedures

(a) Scheduling Interpreter Services. - Interpreter services will be scheduled as determined by local rules or at the direction of the court.

(b) Waiver of Interpreter. - The LEP participant may at any point in the proceeding waive the services of an interpreter. The waiver of the interpreter's services must be knowing and voluntary, and with the approval of the court. Granting such waiver is a matter of judicial discretion, subject to the procedural requirements of section 4(b)(1).

(1) Waiver Procedure.

(i) Before approving the waiver, the judge, in open court, must first explain to the LEP person through an interpreter the nature and effect of the waiver; and

(ii) the judge must determine in open court that the waiver has been made knowingly, intelligently, and voluntarily.

(iii) If the LEP person is the defendant in a criminal matter, the court must further determine that the defendant has been afforded the opportunity to consult with his or her attorney.

(2) At any point in any proceeding, for good cause shown, the LEP person may retract his or her waiver and request an interpreter.

(c) Interpreter Oath. All interpreters, before commencing their duties, shall take an oath that they will make a true and impartial interpretation using their best skills and judgment in accordance with the standards and ethics of the interpreter profession. The court shall use the following oath:

"Do you solemnly swear or affirm that you will interpret accurately, completely and impartially, using your best skill and judgment in accordance with the standards prescribed by law and the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts; that you will follow all official guidelines established by this court for legal interpreting or translating, and discharge all of the solemn duties and obligations of legal interpretation and translation?"

Commentary.

Section 4(a). Comment. The person(s) responsible for arranging for the services of the interpreter and making sure the interpreter is available for appointment to provide services for the court hearing(s) shall be left to the local courts to decide. It is recommended that local rules reflect the arrangement process to assist those appearing before the courts.

Section 4(c). Comment 1. It is common practice for interpreter oaths to be sworn to and maintained on file for all interpreters who are regularly employed by a court. This simplifies the court's inquiries in open court

during procedural hearings. It is recommended, however, that an oath be read and sworn to in open court in all proceedings conducted before a jury.

Section 4(c). Comment 2. The Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts address the various ethical responsibilities of interpreters for accuracy and completeness, impartiality, confidentiality, and other matters relating to the professional conduct of interpreters. The court should be alerted to potential conflicts of interest or other violations of the Rules of Ethics. The sanction of removal from the case is justified for any violations of the Rules of Ethics. See Tennessee Supreme Court Rule 41 for additional information.

Section 5. State Certified and Registered Court Interpreters

(a) To receive designation as a state registered court interpreter, the candidate shall:

- (1) Submit to a criminal background check. Convictions for any felony or for a misdemeanor involving dishonesty or false statement shall disqualify a candidate from certification if such conviction is ten years old or less as provided in Tennessee Rule of Evidence 609;
- (2) Attend an approved ethics and skill building workshop;
- (3) Pass an approved criterion-referenced written examination;
- (4) Provide verification of United States citizenship or the legal right to work and remain in the United States;
- (5) Complete any required forms and pay any required fees; and
- (6) Complete any additional requirements established by the Administrative Director of the Courts pursuant to subsection (d).

If an oral performance examination is available, a registered court interpreter must sit for the examination at least once every twelve months from the date he/she is designated as a registered court interpreter until he/she receives a passing grade to become a certified court interpreter. Failure to sit for the oral examination as required by this section shall result in the loss of designation as a registered court interpreter and the interpreter shall be required to begin the credentialing process anew.

(b)(1) To receive designation as a state certified court interpreter, the candidate shall:

- (i) Successfully meet the requirements to be designated as a state registered court interpreter;
- (ii) Pass an approved criterion-referenced oral performance examination; and

(iii) Complete any additional requirements established by the Administrative Director of the Courts pursuant to subsection (d).

(2) Interpreters with certification as a federal court interpreter shall be granted reciprocity as a state certified court interpreter after successfully meeting the requirements of (a)(1), (a)(2), (a)(4), (a)(5), and (a)(6) above. Interpreters with any other type of certification will be reviewed on a case-by-case basis to determine what steps the interpreters must take to be granted state court interpreter certification.

(c)(1) Once credentialed, certified and registered court interpreters shall be required to renew their credentials every three years. The three-year effective period begins on July 1 following the date of credentialing. Renewals are from July 1 of one year to June 30 of the third year for three-year periods.

(2) Renewing credentials requires the following:

(i) Providing documentation of 18 hours of approved continuing education (CE) credits received during the three- year period. A CE credit is equal to one contact hour in the classroom. A minimum of 12 of the 18 hours must consist of foreign language or interpreting skills training. The Administrative Director of the Courts is authorized to adopt policies and procedures necessary to implement this provision of the rule; and

(ii) Completing any required forms and paying any required fees.

(d) The Administrative Director of the Courts shall determine appropriate examination registration fees as well as examination eligibility requirements, requirements for successful completion of examinations, and penalties for unsuccessful completion of examinations. The Administrative Director of the Courts also has the authority to impose additional requirements for an interpreter to earn, retain, or reinstate status as a registered or certified interpreter. The director is authorized to adopt policies and procedures necessary to implement this provision of the rule.

Commentary.

Comment 1. Court interpretation is a specialized and highly demanding form of interpreting. It requires skills that few bilingual individuals possess, including language instructors. The knowledge and skills of a court interpreter differ substantially from or exceed those required in other interpretation settings, including social service, medical, diplomatic, and conference interpreting. Due to the highly specialized knowledge and skills required in this profession, the Court has promulgated this rule to adopt uniform qualifications for interpreters serving in Tennessee's courts.

Comment 2. A "criterion-referenced" performance examination is one in which the required score is based on an absolute standard rather than one on the relative performance of examinees as measured against one another.

Comment 3. Interpreters are responsible for familiarizing themselves with the credentialing and renewal requirements. For additional information, interpreters should consult the interpreter page of the Administrative Office of the Courts' website, which can be accessed at www.tncourts.gov, or contact the Administrative Office of the Courts.

Section 6. Removal of an Interpreter in Individual Cases

Any of the following actions shall be good cause for a judge to remove an interpreter from a case:

- (1) Incompetence;
- (2) Being unable to interpret adequately, including where the interpreter self-reports such inability;
- (3) Knowingly and willfully making false, misleading, or incomplete interpretation while serving in an official capacity;
- (4) Knowingly and willfully disclosing confidential or privileged information obtained while serving in an official capacity;
- (5) Misrepresentation of credentials;
- (6) Failure to reveal potential conflicts of interest; or
- (7) Failing to follow other standards prescribed by law and the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

Commentary.

It is important to recognize that interpreters are sometimes called to court to interpret for someone who speaks a different language or dialect from that spoken by the interpreter. This section authorizes the court to remove interpreters who are not competent to interpret for this or any other reason, or who violate the Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts.

Section 7. Cost of Interpreter/Translator Services

The reasonable costs associated with an interpreter's and/or translator's services will be compensated when a court finds, upon motion of counsel or on the court's own initiative, that a participant has limited English proficiency ("LEP") The term "interpret" refers to the process of transmitting the spoken word from one language to another. The term "translate" refers to the process of transmitting the written word from one language to another. When it is necessary for a court to utilize the services of an interpreter to determine if an individual is LEP, the AOC will compensate the interpreter for this service. The reasonable costs will be compensated pursuant to this section 7 when a general sessions court, or a municipal court exercising general

sessions jurisdiction, or a juvenile, probate, circuit, chancery, criminal, or appellate court, finds, on motion of a party or on the court's own initiative, that a party has limited English proficiency. Reasonable compensation shall be determined by the court in which services are rendered, subject to the limitations in this rule, which limitations are declared to be reasonable.

(a) Rates of Compensation. Compensation rates for services provided by spoken Spanish foreign language interpreters shall not exceed the following: Certified Interpreter - \$50 per hour; Registered Interpreter - \$40 per hour; Non-Credentialed Interpreter - \$25 per hour. Compensation rates for services provided by spoken foreign language interpreters for languages other than Spanish shall not exceed \$75 per hour. Compensation for interpreters or translators shall not exceed the following: Certified Interpreter - \$500 per day; Registered Interpreter - \$400 per day; Non-Credentialed Interpreter - \$250 per day. If the court finds that these maximum rates are inadequate to secure the services of a qualified interpreter in a language other than Spanish, the court shall make written findings regarding such inadequacy and determine a reasonable maximum rate for a qualified interpreter. Interpreters shall be compensated for in-court interpretation time and travel time at the compensation rate approved by the court. If the in-court interpretation time and travel time total less than two (2) hours, a minimum of two (2) hours will be compensated for the day.

(b) Translation of Documents. The court shall determine if it is reasonably necessary for documents to be translated as part of assuring adequate representation of an indigent party with LEP. Document translation shall be compensated at a rate of twenty cents (\$0.20) per word. If the court finds that this rate is inadequate to secure the services of a qualified translator, the court shall make written findings regarding such inadequacy and determine a reasonable per-word translation rate.

(c) Translation of Audio or Video Media. Services associated with the review or transcription/translation of audio or video tapes that include languages other than English shall be compensated at the same rate provided for spoken foreign language interpreters in section 7(a) of this rule.

(d) Expenses. The following expenses shall be paid as indicated:

(1) Mileage for travel within the state in accordance with Judicial Department travel regulations, if supported by a log showing the mileage, the purpose of the travel, and the origination and destination cities; however mileage will not be paid for travel from residence office to courthouse within the same county;

(2) Lodging where an overnight stay is required, at actual costs, if supported by a receipt, not to exceed the current authorized executive branch rates;

(3) Meals in accordance with the Judicial Department travel regulations, if supported by a receipt, where an overnight stay is required;

(4) Parking at actual costs up to ten dollars per day, if supported by a receipt.

(5) Time spent traveling shall be compensated at the same rates provided for spoken language interpreters in Section 7(a), except that interpreters compensated at a rate of one hundred dollars (\$100) per hour or more shall be compensated for travel time at no greater than fifty percent (50%) of the interpreter's approved hourly rate.

(6) Other expenses not listed in section (d) above, including travel outside the state, will be reimbursed only if prior authorization is obtained from the court.

(e) Prior Approval Required for Services Exceeding \$5,000. If the court approves an amount in excess of five thousand dollars (\$5,000) for interpreter/translator services, the order(s) and any attachments must be submitted to the director for prior approval. If the director denies prior approval of the request, the claim shall be transmitted to the chief justice for disposition. The determination of the chief justice shall be final.

(f) Claims Procedures. Claims for compensation of interpreters and translators shall be submitted utilizing the system established by the AOC for electronic submission. The interpreter/translator's submission to the AOC must also include a copy of the court's order appointing the interpreter/translator.

(1) Claims that total \$200 or more for compensation and expenses shall be reviewed and approved by the judge who presided over the final disposition of the case prior to payment of the claim by the AOC.

(2) Claims that total less than two hundred dollars (\$200.00) shall be exempt from the judicial review and approval requirement. Such claims, however, shall be subject to the AOC's examination and audit pursuant to section 7(f)(4).

(3) Time for Submitting Claims. Claims for compensation under this rule shall be submitted within 180 days of the day the services were rendered. Claims submitted more than 180 days after the services were rendered shall be deemed waived and shall not be paid.

(4) Examination and Audit by AOC.

(i) The AOC shall examine and audit all claims for compensation and reimbursement to insure compliance with this rule and any other applicable rule or statute(s). The AOC may decline to make any payment should there be a failure to comply with the requirements of this Rule or any other Rule or statutory requirements.

(ii) After such examination and audit, and giving due consideration to state revenues, the director shall make a determination as to the compensation and/or reimbursement to be paid and cause payment to be issued in satisfaction thereof.

(iii) Payment may be made directly to the person, agency, or entity providing the services.

(iv) The determination by the director shall be final, except where review by the chief justice also is required. In those instances, the determination of the chief justice shall be final. The chief justice may designate another justice to perform this function if the chief justice determines that a designation is appropriate or necessary.

(v) If the director denies a fee claim in whole or substantial part, such denial shall be forwarded to the chief justice for review. The determination of the chief justice shall be final. Reductions made during the process of auditing a fee claim which are due to mathematical miscalculations or result from requests for payments not permitted by this rule shall not be forwarded to the chief justice for review.

(vi) The payment of a claim by the AOC shall not prejudice the AOC's right to object to or question any claim or matter in relation thereto. Claims shall be subject to reduction for amounts included in any claim or payment previously made which are determined by the AOC not to constitute proper remuneration for compensable services. The AOC reserves the right to deduct from claims which are or shall become due and payable any amounts which are or shall become due and payable to the AOC.

(g) Contract Services and Pilot Projects. To facilitate the prompt and efficient disposition of proceedings which involve individuals with LEP, the AOC director may contract with interpreters that are credentialed pursuant to this Rule. Courts shall use the contracted interpreters unless they are unavailable. Counties may wish to utilize credentialed interpreters on a full-time or part-time basis with reimbursement for those services from the AOC. The rate of compensation shall not exceed, under any circumstances, the rates provided for in this rule. Counties wishing to be reimbursed for these expenses shall contact the AOC, which will determine in what amounts and by what method said reimbursement shall be made. In addition, the AOC is authorized to establish pilot projects that may include, but are not limited to, video or audio remote interpretation and regional interpretation centers.

(h) Eligible Cases and Covered Proceedings. The following provisions govern the payment of interpreter/translator costs pursuant to this rule.

(1) In cases in which an indigent party has a statutory or constitutional right to appointed counsel as outlined in Supreme Court Rule 13, Section I(d)(I) and (2), interpreter costs will be paid for the following proceedings:

(i) All court hearings;

(ii) Pre-trial conferences between defendants and district attorneys in order to relay a plea offer immediately prior to a court appearance or to discuss a continuance;

(iii) Communication between client and state funded counsel appointed pursuant to Supreme Court Rule 13; and communication between client, state funded counsel and others for the purpose of gathering background information, investigation, trial preparations, and witness interviews.

(2) In cases where a party has a statutory or constitutional right to appointed counsel, as defined in section 7(h)(I), and is not found to be indigent, interpreter costs will only be paid for "court proceedings," as defined in section 2.

(3) If a party does not have a statutory or constitutional right to appointed counsel, interpreter costs will only be paid for "court proceedings," as defined in section 2, and at no time will the AOC pay for the costs of interpreters in the following situations:

(i) Communication with attorneys, prosecutors, or other parties related to a case involving LEP individuals for the purpose of gathering background information, investigation, trial preparation, witness interviews, or client representation at a future proceeding unless pursuant to section 7(h)(l) above;

(ii) Communications relating to probation treatment services;

(iii) Any other communication which is not part of a court proceeding or immediately preceding or following a court proceeding.

(4) Pursuant to Article 1, Section 35 of the Tennessee Constitution, interpreter costs shall be paid pursuant to this rule for services to victim(s) of crime during court proceedings in which the victim(s), or in the case of a homicide, the next-of-kin, are present.

Commentary.

Interested persons should contact the Tennessee Administrative Office of the Courts to determine the circumstances in which interpreter services may be approved and paid for by the Administrative Office of the Courts.

[Adopted by order filed April 25, 2002, amended by order filed April 27, 2005; by orders filed December 16, 2011; June 27, 2012; June 29, 2012, effective July 1, 2012; February 6, 2013, effective July 1, 2013 and as amended by order on December 4, 2015, effective the same.]

GLOSSARY

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Audio or Video Transcription and Translation: Written transcription of the entire verbal content and translation of the non-English verbal content of an audio or video recording.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

Auxiliary Aids: Auxiliary aids include, but are not limited to, services or devices such as: qualified interpreters on-site or through video remote interpreting (VRI) services, note takers, assistive listening devices, television captioning and decoders, telecommunication products and systems, qualified readers, taped texts, Brailled materials, and large print materials.

Bilingual Staff: A staff person who has proficiency in speaking, reading and writing skills in two or more languages.

Client: Any person appearing in court before a judge/magistrate or FCRB board, who does not speak English as their native tongue and requires the services of an interpreter, as well as the judge/magistrate and attorneys involved in the case, and staff involved in the case while in a court setting. This includes home and jail visits, and attorney-client meetings.

Consecutive Interpretation: Providing the target-language message after the speaker has finished speaking a sentence or phrase.

Court Proceedings: Any hearing, trial, or other appearance before Juvenile Court.

DEAF: Capital "D" Deaf refers to individuals and communities that identify with Deaf culture and American Sign Language. Lower case "d" deaf refers to the condition of hearing loss.

Deaf Person: A person with a hearing loss so great as to prevent such person from understanding language spoken in a normal tone. "Deaf person" further includes, but is not limited to, a person who is mute and a person who is both deaf and mute.

Individual with a Disability: A person with a physical or mental impairment that substantially limits one or more major life activities. Major life activities include caring for one's-self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks and learning.

Interpretation: Unrehearsed transmission of a spoken message from one language to another rendition based on an individual's oral account. The result is the oral rendition in the target language.

Language Services Coordinator: Coordinates interpreter services for Spanish and other languages, to provide all individuals with equal access to court services.

LEP Language Services Program: This program provides direct Spanish interpreter services for Limited English Proficiency (LEP) client, and also coordinates non-Spanish interpreter services. This service is provided in partnership with the Administrative Office of the Court (AOC).

Language Assistance Services: Interpretation services and/or translation services provided by bilingual personnel or interpreter personnel to a limited English Proficient (LEP) individual in his/her primary language to ensure their ability to communicate effectively with agency or agency contractor personnel.

Limited English Proficiency (LEP): A person who cannot speak or understand English as their primary language and who have a limited ability to read, write, speak or understand the English language.

Meaningful Access: Generally involves some combination of oral interpretation services and written translation of vital documents. Meaningful access may entail providing language assistance services, including telephone interpreter lines, bilingual staff and volunteers, oral interpretation services, and written language services.

Oral Interpreter: A person who interprets language through facial and lip movements only and who does not use manual communication.¹¹

Qualified Deaf Interpreter: An interpreter certified by the National Registry of Interpreters for the Deaf, Tennessee Registry of Interpreters for the Deaf, or, in the event an interpreter so certified is not available, an interpreter whose qualifications are otherwise determined. Efforts to obtain the services of a qualified interpreter certified with a Legal Skills Certificate or a Comprehensive Skills Certificate will be made prior to accepting services of an interpreter with lesser certification¹².

Section 504 of the Rehabilitation Act of 1973, as amended: Federal law that protects individuals from discrimination based on disability. Under this law, individuals with disabilities may not be excluded from or denied the opportunity to receive benefits and services from certain programs. Section 504 applies to entities that receive financial assistance from any Federal department or agency, including the U.S. Department of Health and Human Services (HHS).

Sight Translation: Oral translation of a written text.

Simultaneous Interpretation: Providing rendition of the target-language message at approximately the same time the source-language message is being produced.

Source Language: The input language requiring interpretation.

¹¹ Tennessee Code Annotated. §24-1-211: *An oral interpreter shall be provided upon the request of a deaf person who does not communicate in sign language. The right of a deaf person to an interpreter may not be waived except by a deaf person who does not use sign language and who initiates such request for waiver in writing. Such waiver is subject to approval of counsel to such deaf person, if existent, and is subject to approval of the appointing authority.*

¹² Ibid: *No "qualified interpreter" shall be appointed unless the appointing authority and the deaf person make a preliminary determination that the interpreter is able to readily communicate with the deaf person and is able to accurately interpret the statements of the deaf person and interpret the proceedings in which a deaf person may be involved.*

Translation: The term "translate" refers to the process of transmitting the written or spoken word from one language to another.

Target Language: The output language into which the utterance is being interpreted.

Tennessee Supreme Court Rule 41: Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier. As officers of the court, interpreter help assure that such persons may enjoy equal access to justice and that court proceedings and court support services function efficiently and effectively. Interpreters are highly skilled professionals who fulfill an essential role in the administration of justice.

Tennessee Supreme Court Rule 42: This rule recognizes that for most people living in the United States, English is their native language, or they have learned to read, speak, and understand English. There are others for whom English is not their primary language. For them language can be a barrier to understanding and exercising their legal rights, and to securing meaningful access to the judicial system. This rule is promulgated to assist the courts in this state in providing equal access to the courts to participants who have a limited ability to speak or understand English.

STATEMENT OF ACCESSIBILITY

STATEMENT OF ACCESSIBILITY

It is both the policy and responsibility of the Metropolitan Government of Nashville and Davidson County to ensure that its programs, services, and activities are accessible, and that practical use by all people, regardless of whether they are residents or visitors, is not restricted or hindered in violation of standards relating to individuals with disabilities or those who cannot speak, write, read, or understand English. Within reason and as required by law, Metro personnel shall provide accommodations, without charge.

I speak English

Ez kurdî dipeyvîm
(Kurdish)

Yo hablo Español
(Spanish)

म नेपाली बोल्न
(Nepali)

أنا أتحدث العربية
(Arabic)

Je parle Français
(French)

Anigu waan hadli
Soomaali
(Somali)

Ninasema
Kiswahili
(Swahili)

Tôi nói tiếng Việt
(Vietnamese)


(ASL)



Please contact the department's Title VI or ADA Coordinator to request language assistance services and/or accommodations.

If you are dissatisfied with your request or if you believe you have been subject to discrimination, you may file a formal complaint with:

Metro ADA & Safety Services, contactADA@nashville.gov (615)862-8744

Metro Human Relations Commission mhrc@nashville.gov (615)880-3370



ACKNOWLEDGEMENTS

Program Development Team

David Morale, Juvenile Court Language Services Coordinator
Shelley Hudson, Juvenile Court, Special Projects Program Manager

Administrative Review Committee

Kathy Sinback, Juvenile Court Administrator
Tommy Bradley, Juvenile Court Deputy Court Administrator

Peer Partner Review

Melody Fowler-Green, Metro Human Relations Commission
Ryan Mouser, Language Access Program Manager, Tennessee Supreme Court, AOC

Produced by

Shelley Hudson, Juvenile Court, Special Projects Program Manager

Approved by

Sheila D. J. Calloway, Juvenile Court Judge

	Chapter Departmental Business Practices	Title 2.23: Interpreter Requests	Effective Date 07/01/2018
Appointing Authority Sheila D.J. Calloway, Judge	Approved Date 07/01/2018 Approved By 	Related Standards Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreters in Tennessee Courts; T. C. A.¹§24-1-211: Providing Oral or Deaf Sign Language in Administrative and Judicial Proceedings; Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Person With Limited English Proficiency; Executive Order 13166: Improving Access to Services for Persons With Limited English Proficiency (August 11, 2000)²	Revised Date

PURPOSE:

To establish policy and procedural guidelines for employees making an interpreter requests.

DEFINITIONS:

Appointing Authority: The Metropolitan official who is given authority to direct all functions of a department. The Appointing Authority for the Juvenile Court is the Juvenile Court Judge.

Authorized Designee: The person in a chain of command having departmental authority, as appointed by the Appointing Authority, Court Administrator, Deputy Court Administrator, or Supervisor.

Consecutive Interpretation: Providing the target-language message after the speaker has finished speaking a sentence or phrase.

Deaf Person: A person with a hearing loss so great as to prevent such person from understanding language spoken in a normal tone. "Deaf person" further includes, but is not limited to, a person who is mute and a person who is both deaf and mute.

Interpretation: Spoken rendition based on an individual's oral account. The result is the oral rendition in

¹ Rule 41: States in part...*Many persons who come before the courts are partially or completely excluded from full participation in the proceedings due to limited English proficiency (LEP). It is essential that the resulting communication barrier be removed, as far as possible, so that these persons are placed in the same position as similarly situated persons for whom there is no such barrier.*

² Executive order 13166: Improving Access to Services for Persons with Limited English Proficiency states in part... *recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.*

 Juvenile Court METROPOLITAN NASHVILLE & DAVIDSON COUNTY	Chapter Departmental Business Practices	Title 2.23: Interpreter Requests	Page Page 2 of 3

the target language.

Limited English Proficiency (LEP): A person who is not fluent in the English language, often because it is not their native language.

Oral Interpreter: A person who interprets language through facial and lip movements only and who does not use manual communication.³

Qualified Deaf Interpreter: An interpreter certified by the National Registry of Interpreters for the Deaf, Tennessee Registry of Interpreters for the Deaf, or, in the event an interpreter so certified is not available, an interpreter whose qualifications are otherwise determined. Efforts to obtain the services of a qualified interpreter certified with a Legal Skills Certificate or a Comprehensive Skills Certificate will be made prior to accepting services of an interpreter with lesser certification⁴.

Sight Translation: Oral translation of a written text.

Simultaneous Interpretation: Providing rendition of the target-language message at approximately the same time the source-language message is being produced.

Source Language: The input language requiring interpretation.

Target Language: The output language into which the utterance is being interpreted.

POLICY⁵:

1. In any case in law of equity before the court, wherein any deaf person is a party to such action, either as a complainant, defendant, or witness, the court may appoint a qualified interpreter of the deaf sign language to interpret the proceedings to the deaf person and interpret the person's testimony or statements and to assist in preparation with counsel⁶.
2. In any case in law of equity before the court, wherein any LEP person is a party to such action, either as a complainant, defendant, or witness, the court may appoint a qualified interpreter of language to interpret the proceedings to the LEP person and interpret the person's testimony or statements and to assist in preparation with counsel.

³ Tennessee Code Annotated. §24-1-211: *An oral interpreter shall be provided upon the request of a deaf person who does not communicate in sign language. The right of a deaf person to an interpreter may not be waived except by a deaf person who does not use sign language and who initiates such request for waiver in writing. Such waiver is subject to approval of counsel to such deaf person, if existent, and is subject to approval of the appointing authority.*

⁴ Ibid: *No "qualified interpreter" shall be appointed unless the appointing authority and the deaf person make a preliminary determination that the interpreter is able to readily communicate with the deaf person and is able to accurately interpret the statements of the deaf person and interpret the proceedings in which a deaf person may be involved.*

⁵ This policy applies only to the Juvenile Court of Davidson County. The Metropolitan Government of Nashville and Davidson County Civil Service Rules, Section 1.10 - Departmental Rules, states in part... *Appointing authorities shall implement additional rules to govern their departments, specific rules which would apply to their departments only or are not covered in the Civil Service Rules.*

⁶ Tennessee Code Annotated §24-1-211.

	Chapter Departmental Business Practices	Title 2.23: Interpreter Requests	Page Page 3 of 3

3. Interpreters for persons with Limited English Proficiency have as a duty to ensure that the proceedings in English reflect precisely what was said by the LEP person, and to place the LEP person on an equal footing with those who understand and speak English. This creates an obligation to conserve every element of information contained in a source language communication when it is rendered in the target language⁷.
4. Generally, hearings requiring two plus (2+) hours should require two interpreters.
5. Parties needing interpreting may waive the right to an interpreter.
6. Employees have access to language lines for interpretation services.

PROCEDURES:

Interpreter requests are submitted electronically to the official Juvenile Court Interpreter Group email.

REVIEW:

This policy is reviewed annually by the Appointing Authority or authorized designee.

FORMS:

None.

⁷ Tennessee Supreme Court Rule 41: Rules of Ethics for Spoken Foreign Language Interpreter in Tennessee Courts, Canon 1: Accuracy and Completeness.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Juvenile Court Clerk Year: 2025

Title VI Coordinator: Telisa Banniza Form Completed By: Telisa Banniza

Form Completion Date: 6/12/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

Outlined in the Juvenile Court Clerk policy manual and Title VI power point.

☐ Not Provided

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

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

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

☐ Yes ☒ No will be attending in the fall.

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

Outlined in the Juvenile Court Clerk policy manual and Title VI power point.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

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

☒ Yes ☐ No

List all locations where the notice is posted:

Posted in the JJC lobby and the breakroom

☒ Yes ☐ No

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

☐ Yes ☐ No

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

☐ Yes ☐ No

☒ Posted Signs ☒ Website☒ Other☒ Yes ☐ No

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

☐ Yes ☐ No

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

[illegible]

Monitoring Subrecipients

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

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

☐ Yes ☒ No

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

Language Access to Persons who are limited English Proficient

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

Does your department have a written language plan?

☐ Yes ☒ No

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

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

The Juvenile Court Clerk office has 3 bilingual employees that assist customers via in person and on the phone. The office also works with the translators with Juvenile Court.

Minority Representation on Planning or Advisory Bodies

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

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

☐ Yes ☒ No

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

[illegible]

	Select an Item

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



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metro Action Commission Year: 2025

Title VI Coordinator: Elizabeth Exume Form Completed By: Elizabeth Exume

Form Completion Date: 6/25/2025

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

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

Training

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

If so, how is the training provided?

A PowerPoint presentation containing an embedded Title VI video is sent to all staff members. After viewing the presentation and the video, staff members must sign an acknowledgment form to confirm their completion and understanding. This form is then uploaded to ChildPlus for record-keeping purposes.

☐ Not Provided

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

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

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

☒ Yes ☐ No

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

Title VI is coordinated by the Learning and Development Coordinator and the Title VI Coordinator. Title VI is viewed for all agency employees. The language access plan is part of the training, posted, and shared with agency employees.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Metropolitan Action Commission HR Department

Employee Break Rooms

Customer Lobby

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

Employee Handbook

SECTION 6.7 — GRIEVANCE PROCEDURE

6.7.1 General

A grievance is defined as an employee's claim that a violation, misinterpretation, misapplication or non-application of a specific rule or policy has adversely affected him.

Complaints alleging discrimination or other violations of applicable EEO laws must be filed as discrimination complaints in accordance with the EEO Complaint Procedure.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☒ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☒ Yes

☐ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
Leslie Buggs	Black or African American
Erika Burnett	Black or African American
Michael Cousin	Black or African American
Kanika Covert	Black or African American
Jeff Gregg	White
Brittany Irby	Black or African American
Shilan Haji	White
Joseph Mitchell	Black or African American

Renee Pratt	Black or African American
Jeffrey Sheehan	White
Justin Singleton	Black or African American
LaVoneia Steele	Black or African American
Veronica Uribe	Hispanic or Latino
Terry Vo	Asian
Parv Santhosh-Kumar	Asian
Lori Flemming	Black or African American
Topania Byars	Black or African American
Diana Reado	Black or African American

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

The agency uses a democratic selection process by which agency customers nominate and/or elect persons to represent the community on the board of commissioners.

LANGUAGE ASSISTANCE PLAN

METROPOLITAN ACTION COMMISSION

It is recognized that persons with Limited English Proficiency (LEP) may experience a barrier in receiving benefits under programs offered by the Metropolitan Action Commission (MAC). If language assistance services are not available for these persons, violations of Title VI of the Civil Rights Act of 1964 may occur. To ensure compliance with Title VI, this agency shall adopt the following procedures to ensure that eligible persons with LEP have meaningful access to all services of the Metropolitan Action Commission.

1. The following person(s) are available to provide for persons with LEP translation/interpreter services in the following language(s):

SPANISH

Carvajal, Giovanni

Compliance, 615-862-8722, ext. 76606

Liseth Lopez

Berry Head Start, 615-862-8911

Rivera-Baker, Ivette

Berry Head Start, 615-862-8911

FRENCH

Nguyen, Jim

Richland Head Start, 615-862-8935 x 76777

ARABIC

Abdo, Martiena

Family & Community Services, 615-862-8860

Amal Shaker

Dudley Head Start, 615-862-8885

Jaber, Khaddouj

Berry Head Start, 615-862-8911

VIETNAMESE

Nguyen, Jim

Richland Head Start, 615-862-8935

2. The person(s) who are identified above to provide translation/interpreter services for this agency will also translate information to persons with LEP about Title VI rights.
3. All employees will be trained annually on Title VI provisions and serving persons with LEP.
4. Training will be provided for all new employees during their orientation on Title VI provisions and serving persons with LEP.
5. Information has been posted in a conspicuous place at each site to advise that free translation/interpreter services are available.
6. Documentation of all required employee training for language assistance services will be maintained on file.
7. The Metropolitan Government has contracted with the following vendors for interpreter services:

AllWorld (In Person and document)

301-881-8884

Bridges (Sign Language Interpretation)

615-248-8828

Language Line (OPI and Document)

831-648-7140

Language Training Center (In Person/
Document) 888-456-1626

Lingualinx (Document and Phone)

518.388.9000 ext. 1014

Real Time Translation (Document Only)

205-910-6929

Voiance (All)

866-742-9080 x 1708

This plan is effective November 1, 2024, and will remain in effect until amended.



NAME AND TITLE OF AUTHORIZED OFFICIAL



DATE

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metro Nashville Public Schools Year: 2025

Title VI Coordinator: Brittany Edmondson Form Completed By: Brittany Edmondson

Form Completion Date: 6/16/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

In-person training is provided for all new employees. New employees are provided with information on locating additional resources to support Title VI information. New employees are provided guidance on accessing and locating Title VI information on the mnps.org website and within the MNPS Employee Handbook. [MyMNPS - Home](#)

New Hire Orientation provides on the attached Cards for Paper Policy & Procedure. Also, the presenter shares where employees can access policy, procedure, and handbooks in our PPT and on a scavenger hunt (also attached).

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

All MNPS employees are required to complete an annual mandatory training to receive information and updates on Title VI and related services. MNPS employees are able to locate the language access plan on the mnps.org website, in the MNPS employee handbook, and by contacting the MNPS Civil Rights Office. Every time there is a labor law poster update, new posters are sent to each building within MNPS. This is coordinated through the MNPS Mail room and the Employee Relations department. The mandatory training link for Civil Rights training incorporating Title VI is Annual Required Training- Certified 24-25

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

MNPS website accessible by clicking on the blue “Legal” link. All public facing information tabs reference that the Title VI of the 1964 Civil Rights Act notice can be found by clicking on hyperlink that is directed to the Legal page outlining same.

<https://mnps.org/>

MNPS Student Parent Handbook

MNPS Parent University Workshops

Title VI of the 1964 Civil Rights Act notice is posted on all job bulletins for both internal and external applicants on the MNPS website and MNPS employee sharepoint.

Posted in MNPS buildings including but not limited to Schools, Central Office Support Hub, Enrollment Centers. All are posted in English and Spanish, and directly next to the posters is a translation services poster available for additional language supports.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☒ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?
☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

Employee/HR Title VI complaints, investigations and/or lawsuits: 9 [Title VI reporting 6.2025.docx](#)

Student to Student Title VI Complaints: none

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?
☐ Yes ☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?
☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

“Families have the right to request an interpreter for any communication with the school. To request an interpreter, contact your child's school (a teacher or administrator), the Family Information Center at 615-259-4636, or the Office of English Learners at 615-259-8608”

[Request an Interpreter - Metro Nashville Public Schools](#)

[Student-Parent Handbook - Metro Nashville Public Schools](#)

[Strategic Plan - Metro Nashville Public Schools](#)

[English EL DCL Fact Sheet](#)

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Federal Programs and Grants: [Federal Programs and Grants - Metro Nashville Public Schools \(mnps.org\)](#)

MNPS Board Policy Human Resources
Employee Relations Board Policy to File
Grievance [214](#)

MNPS Human Resources Employee Relations
Sharepoint (direct link accessible by all
employees to file grievance) [MyMNPSHR - Home](#)

MNPS Employee Relations Title VI
Complaints, Investigations and/or Lawsuits:
[Title VI reporting 6.2025.docx](#)

Non-Discrimination Statement

Metropolitan Nashville Public Schools (MNPS) does not discriminate on the basis of race, religion, creed, sex, gender, gender identity, sexual orientation, national origin, color, age and/or disability in admission to, access to or operation of its programs, services or activities and provides access to the Boy Scouts and other designated youth groups. MNPS does not discriminate in its hiring or employment practices. Learn more in the [MNPS Legal section](#).

Civil Rights Compliance

MNPS is committed to ensuring all students and adults are given the opportunity to learn, participate and work in an environment that is free from discrimination by adhering to laws below. Please report discrimination or harassment online using the [Incident Reporting Form](#). Learn more in the [MNPS Legal section](#).

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race or ethnicity, color or national origin.

To file a Title VI or Title IX complaint, or have inquiries, please email the **civil rights team**, call 615-259-8634 or write to: 2601 Bransford Avenue, Nashville, Tenn. 37204.

Title VII of the Civil Rights Act of 1964

Title VII protects individuals against employment discrimination on the basis of race, color, religion, sex, as well as national origin.

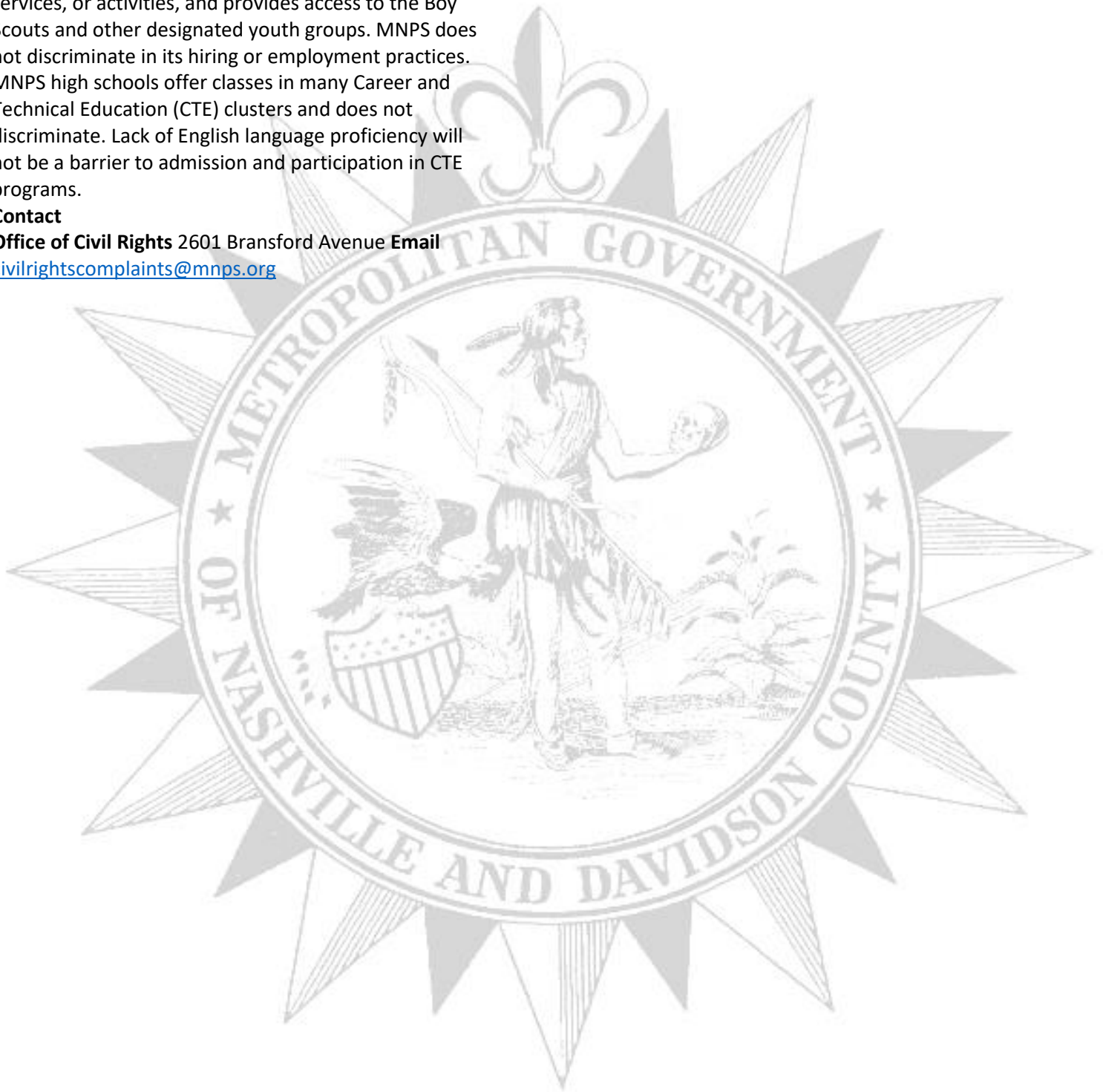
CTE Notice of Non-Discrimination

The Metropolitan Nashville Public Schools (MNPS) does not discriminate on the basis of race, religion, creed, sex, gender, gender identity, sexual orientation, national origin, color, age, and/or disability in admission to, access to, or operation of its programs, services, or activities, and provides access to the Boy Scouts and other designated youth groups. MNPS does not discriminate in its hiring or employment practices. MNPS high schools offer classes in many Career and Technical Education (CTE) clusters and does not discriminate. Lack of English language proficiency will not be a barrier to admission and participation in CTE programs.

Contact

Office of Civil Rights 2601 Bransford Avenue **Email**

civilrightscomplaints@mnps.org



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metropolitan Clerk Year: 2025

Title VI Coordinator: Austin Kyle Form Completed By: Austin Kyle

Form Completion Date: 6/15/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Power Point

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via email

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

If Yes, please provide it by attaching it to this response.

☒ Yes ☐ No☐ Posted Signs ☐ Website☐ Other n/a

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☒ No

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☐ Yes ☒ No

N/A

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

☐ Yes ☒ No

At this time, the department does not have a language access policy. We will be working to develop a plan during this next fiscal year.

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes ☒ No[illegible]

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Metropolitan Development and Housing Agency Year: 2025

Title VI Coordinator: Jynniifer J. Walker, Director of Human Resources

Form Completed By: Jynniifer J. Walker, Director of Human Resources

Form Completion Date: 6/2/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

On-boarding and annually as a part of compliance training

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

On-boarding and a part of the compliance training

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted: All properties and administration offices.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☒ Website☒ Other On-going compliance training

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☒ Yes ☐ No

Part of the initial contract and ongoing compliance reviews.

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

☒ Yes ☐ No

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes ☒ No[illegible]

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.





HR 020 - Preventing Harassment for Managers

Description

This course will cover your mandatory sexual harassment training. Our goal is to provide training that helps prevent sexual harassment within our company. Please review the items below for an overview of what to expect.

Objective

This course will cover the following:

- Definitions of sexual harassment
- Department of Fair Employment and Housing contact information
- Remedies under the Law
- Types of sexual harassment
- Sexual harassment examples
- Gender Harassment
- Commitment to preventing sexual harassment
- Promoting a healthy company culture
- Detailed company policy prohibiting sexual harassment
- Human Resources (HR) role in investigating harassment complaints
- What if I am accused of sexual harassment?
- What scenarios
- Where to go for help

HR 010 - Preventing Harassment

Description

This course provides training that will help prevent all types of harassment. This course covers the following topics: Definitions of sexual harassment, remedies under the law, types of sexual harassment, examples of sexual harassment, and a commitment to preventing sexual harassment. It also details promoting a healthy company culture, company policy prohibiting sexual harassment, and the role of Human Resources (HR) in investigating harassment complaints. Additional resources address: "What if I am accused of sexual harassment?" and "Where do I go for help?"

Objective

After completing this course, you'll be able to:

- Identify what sexual harassment is and what types there are.
- Help prevent harassment at your company and commit to preventing it.

FH 100 - Federal Fair Housing Compliance

Description

Fair housing laws prohibit discrimination based on seven federally protected classes. In this course, we'll cover why this matters to our company, our residents, and our business. You'll also learn some best practices for maintaining fair housing compliance, what the complaint process looks like, and so much more.

Objective

By the end of this course, you should be able to:

- Define discrimination and identify how it relates to fair housing.
- Identify the seven protected classes as outlined by the Fair Housing Act.
- Identify illegal acts of discrimination as outlined in the Fair Housing Act.
- Identify best practices for welcoming prospects and applicants.
- Demonstrate proper practices for in-person, phone, and email communications.
- Identify the best practices for handling service requests.
- Identify the steps involved in the reasonable accommodation request decision process.

- Distinguish how market-rate properties differ from affordable properties when it comes to fair housing.
- Identify who can file a housing discrimination complaint and when.

FH 110 - Federal Fair Housing Compliance for Maintenance

Description

Fair housing laws prohibit discrimination based on seven federally protected classes. In this course, we'll cover why this matters to maintenance staff. You'll also learn some best practices for maintaining fair housing compliance, what the complaint process looks, and so much more.

Objective

By the end of this course, you should be able to:

- Define discrimination and identify how it relates to fair housing.
- Identify the seven protected classes as outlined by the Fair Housing Act.
- Identify illegal acts of discrimination as outlined in the Fair Housing Act.
- Demonstrate proper practices for in-person and phone communications.
- Identify the best practices for handling service requests.
- Distinguish how market-rate properties differ from affordable properties when it comes to fair housing.
- Identify who can file a housing discrimination complaint and when.

Any employee that:

- *experiences harassment or discrimination.*
- *witnesses' harassment or discrimination.*
- *was told of harassment or discrimination.*

must immediately report the incident to a department director, supervisor, manager, the Human Resources Office, or the agency's ethics line. If your supervisor is the harasser, you may report the incident to another department director, manager, the human resources office, or the agency's ethics line.

Investigation/Outcome: A prompt investigation will be conducted into all complaints of harassment and discrimination. Employees are expected to participate fully and in good faith in the investigative process with relevant information. All information will be held in confidence as reasonably possible. Any employee who is found to have violated the harassment and respectful workplace policy will be subject to corrective action up to and including dismissal from employment.

Retaliation: MDHA will not retaliate against any employee, resident, or third party who:

- Initiates a complaint.
- Reports an incident that may violate this policy.
- Participates in an investigation related to a complaint.
- Is associated or perceived to be associated with a person who initiates a complaint or participates in investigating a complaint under this policy.

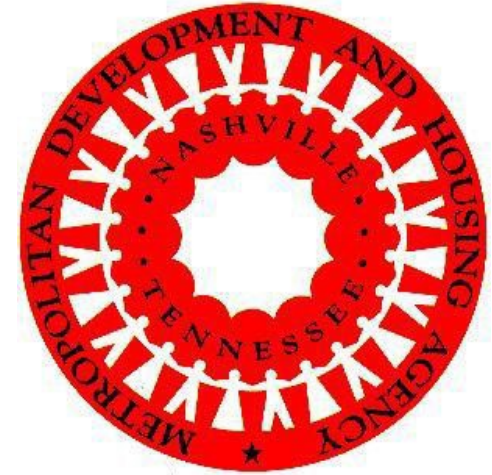
DEPARTMENT DIRECTORS

Asset Management		
Julia Moss		252-8590
Communications		
Danielle Allen		252-8493
Community Development		
Emel Alexander		252-8507
Compliance & Risk Management		
Diana Reado		252-8441
Finance		
Fitzgerald Marche		252-8487
Human Resources		
Jynniifer Walker		252-8558
Information Technology		
Tim Harris		252-8523
Legal		
Will Choppin		252-6710
Planning & Development		
Curtis Thomas		252-8426
Property Management		
Ricardo Donelson, Maintenance		252-8471
Donald Jackson, Operations		252-6721
Rental Assistance		
Norman Deep		252-6517
Resident Services		
Eugene Spencer		252-6722
Urban Development		
Joe Cain		252-8404

Ethics Hotline 877-507-7302

www.reportlineweb.com/MDHA

Civility and Respectful Workplace Policy



Anti- Harassment

**METROPOLITAN
DEVELOPMENT
AND HOUSING AGENCY**

HUMAN RESOURCES OFFICE

Statement of Position

Civility and Respectful Workplace Policy

The MDHA work environment is professional, diverse, inclusive, and respectful. MDHA is committed to creating and maintaining a respectful workplace free from harassment and where all individuals are treated with fairness, dignity, and respect. Employees, residents, and members of third parties doing business with MDHA should feel comfortable and feel free from intimidation, hostility, bullying, or other offenses that might interfere with work performance or the living environment.

Harassment and discrimination may take many forms. It may be intentional or unintentional, a single incident or several incidents.

Discrimination and harassment may be based upon a person's race, color, sex, age, religion, gender, gender identity, disability, national origin, sexual orientation, genetics, or another legally protected status.

Examples of disrespectful or harassing behavior include but are not limited to:

- Exhibiting aggressive or unprofessional behavior including shouting, abusive language, threats of violence, the use of obscenities or other non-verbal expressions of aggression.
- Behavior that a reasonable person would find to be demeaning, humiliating, or

bullying: such as mean-spirited teasing, put-downs, or insults.

- Verbal or written harassment through jokes, pranks, racist or sexist remarks, derogatory comments, offensive language, gossip, and slanderous electronic communications and emails.
- Unwelcome sexual or romantic advances.
- Physical conduct ranging from touching to serious assault.
- Threats, intimidation, or retaliation against an employee, including one who has expressed concerns about perceived unethical or illegal workplace behavior.
- Prohibiting a transgender person from presenting themselves according to their gender identity

Sexual harassment - may include unwelcome sexual or romantic advances, requests for sexual favors, or other verbal and physical conduct of a sexual or romantic nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or tenancy, (2) submission to or rejection of such conduct by an individual is used as the basis for decisions affecting that individual's employment or tenancy, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or tenancy, or creating an intimidating, hostile, or offensive working or living environment.

Hostile Work/living Environment: A workplace filled with discriminatory intimidation, ridicule, and insults, which is sufficiently severe or pervasive to alter the conditions of a person's employment and create an abusive work or living environment.

Respectful and Professional Behavior -

It is essential to understand the difference between respectful and/or professional behavior and hostile and harassing behavior. Employees may experience stress, discomfort, and corrective action in the workplace unrelated to harassment.

Examples of non-harassing behavior:

- The normal exercise of supervisory or managerial responsibilities, including but not limited to negative performance reviews, work direction, performance management, and disciplinary action, provided they are conducted in a professional and non-discriminatory manner.
- Disagreements, misunderstandings, miscommunication, or conflict situations where the behavior remains professional and non-discriminatory.

Employee awareness and responsibilities –

As an MDHA employee, you are expected to conduct yourself in a manner that demonstrates professionalism and respect for others in the workplace. Employees' commitment to a respectful and harassment-free workplace ensures everyone is treated with dignity and respect.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Municipal Auditorium Year: 2025

Title VI Coordinator: Taneisha Alexander Form Completed By: Taneisha Alexander

Form Completion Date: 6/26/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☒ No

If so, how is the training provided?

New Hire training through HR

☒ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Our employees are English (first language), however, client info can be translated in different languages.

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☒ No

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☒ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☒ We do not post this to the public.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes ☒ No[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Nashville Department of Transportation Year: 2025

Title VI Coordinator: Charles Boddie Form Completed By: Charles Boddie

Form Completion Date: 6/20/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Information on Title VI is posted throughout the department.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☐ No

List all locations where the notice is posted:

Administration Building – Break Room and Main Announcement Board (Visible to the Public)

Operations Building – Roll Call Room

Engineering Building – Main Announcement Board (Visible to the Public)

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☒ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Recently, we completed a draft of our Language Access Plan. Our next step is to have it vetted by the UT Language Center. We used their access plan as a model in terms of format and content. The UT Language Center has worked with us on providing translation for Spanish speakers during community meetings and other events.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Office of Emergency Management Year: 2024

Title VI Coordinator: Drusilla Martin Form Completed By: Jamie Summers

Form Completion Date: 5/20/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☒ No

If so, how is the training provided?

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Post on Bulletin boards

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Public lobby and breakroom in building

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

If Yes, please provide it by attaching it to this response.

☒ Yes ☐ No☒ Posted Signs ☒ Website

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

Record of Title VI Complaints, Investigations and Lawsuits

☒ Yes ☐ No

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

Waiting to see if Human Relations puts a plan in place that is consistent across Metropolitan Government of Nashville & Davidson Cty.

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes ☒ No[illegible]

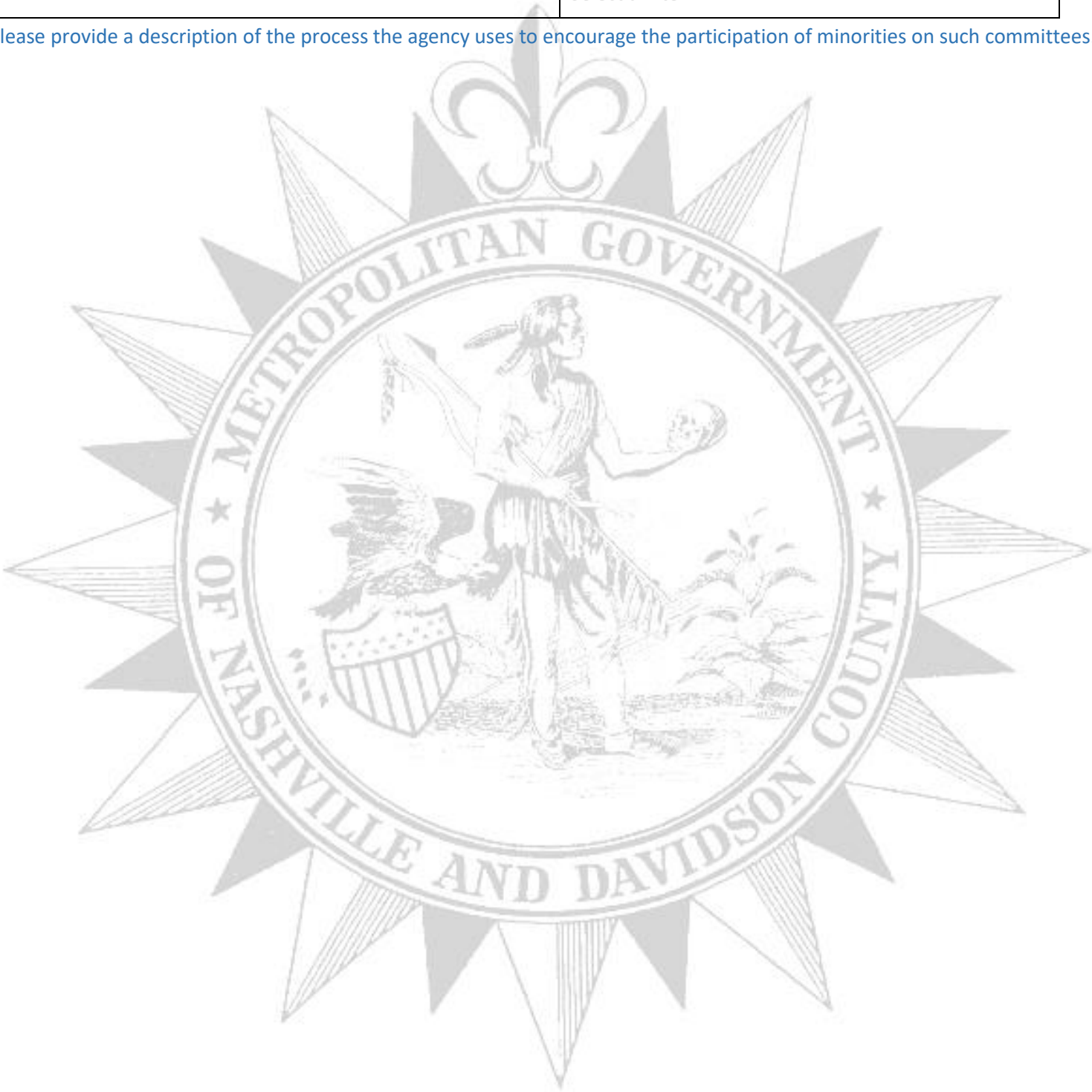
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Office of Family Safety Year: 2025

Title VI Coordinator: LaToya Townsend Form Completed By: LaToya Townsend

Form Completion Date: 6/19/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Metro Central HR New Employee Orientation & Training as required by state and federal grants.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Employee Personnel Manual and during staff onboarding

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted

Entrance Lobby, copy areas, break room

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes via Central HR ☐ No

We refer our complaints to Central HR & Metro Legal

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 1

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☒ Yes☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

In person monitoring and required postings

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A





Metro Office of
Family Safety

Where Hope and Healing Begin

LANGUAGE ACCESS GUIDE

For the utilization of OFS Staff ONLY



LTC LANGUAGE SOLUTIONS

VIDEO & TELEPHONE INTERPRETING

1

Visit the following link:
<https://video.cyracom.com/sign-in>

2

Type in Email & Password:
Email: OFSRemoteAdvocate@jisnashville.gov
Password: video123

3

Connect with interpreter

* You MUST get video interpreter approved by a supervisor, but for regular interpreting (obtained by clicking the microphone button) you may utilize as needed without approval.

VOICANCE

FOR ALL OTHER LANGUAGES
INTERPRETATION

1

Dial out number → 1-844-541-3961

2

Use Account # → 26169

3

Enter Pin → 4834

4

If you want a specific gender for interpreter – instead of pressing the number for the languages, press “0” and let them know the gender and language you need.

MAYA INTERPRETERS

FOR CENTRAL/SOUTH AMERICAN
INDIGENOUS LANGUAGES

1 Dial out number → 1-855-629-2872

2 Provide Account Number ← MC400730

* Whenever possible attempt to request interpreter in advance to ensure interpreter is available. To do this, send an email to request@mayainterpreters.com and fill out the form found on the OFS Interpretation and Translation Guide

AUAZA FOR SPANISH INTERPRETATION

1 Dial your OTP Telephone number: 534-3400

2 Press 1 for Spanish

3 Be able to provide your:
• Access Code: 326
• Name
• Requested Language

4 Wait for interpreter to begin your session

BRIDGES FOR THE DEAF & HARD OF HEARING

INTERPRETATION FOR DEAF/HARD OF HEARING

1

Dial out number → 615-248-8828

2

Let them know you are requesting a Video Remote Interpreter on behalf of the Office of Family Safety. If asked, the account should also be under Jocelyn Hernandez (there is no account number)

3

Before calling, be prepared with the following:

- A room with a computer screen accessible to you and the client (all-in-ones)
- Client Name and Info
- Advocate name, phone number, and email* (they will send a zoom link to connect to)

continue on the back →



Metro Office of
Family Safety

FREE INTERPRETATION SERVICES

The following services that are labeled as “free” are temporary language assistance that is completely free of charge to OFS. **Please prioritize using these services FIRST** while they are available.



TN LANGUAGE CENTER LANGUAGE LINE

FOR ALL LANGUAGES (OVER 380).
SERVICES ACCESSIBLE 24/7/365

1

Call the TLC Telephonic Interpretation line at 800-444-6627.

2

Enter your unique 8-digit PIN 8481-3609

3

Say your company or organization name

4

Select the language from the menu or press 0 for all other languages.

5

Connect with an interpreter

*

If you have any difficulty using the service or would like to provide feedback, please email CIPD@tennessee.edu.

BRIDGES FOR THE DEAF & HARD OF HEARING CONTINUED

4
Services the client is needing
(OP, court advocacy, safety
planning, etc.)

5
Estimated duration

*advocate may give own work
number or all-in-one email can
be given as well (ex:
ofscient01@jishnashville.gov)

*Once this is given, the
interpreter coordinator at
Bridges will send you a
Zoom invite via email with a
link where the ASL
interpreter will be
connecting virtually.

TN LANGUAGE CENTER LANGUAGE LINE FOR IN PERSON INTERPRETING

1
Ensure to request
interpreter at least 24-48
hours in advance

2
Send an email with the following
to richard.poncedeleon
@tennessee.edu
and CC Maria Arvizu
(mariaarvizu@jishnashville.gov)
1. General overview of client
meeting purpose
2. Location of client meeting
3. Time and Duration
4. Language Needed

3
Connect with interpreter

ACTIVATING CHANGE

FREE

FOR DEAF & HARD OF HEARING

1

Access the Interpreter Request Form and fill it out via this link:

<https://forms.monday.com/forms/ad614fd34a9d3e79521d5fa4a581b5fa?r=use1>

2

When filling out the form, please identify your client **ONLY** by one of the following Victim Identification Numbers that Activating Change has assigned to OFS:

- 231801
- 231802
- 231803
- 231804
- 231805

 Use only one number per client. When we have used all the numbers, we will request more.

 continue on the back



Metro Office of
Family Safety

Where Hope and Healing Begin

POLICIES

- OFS will not use minor children to interpret, in order to ensure confidentiality of information and accurate communication, and to prevent re-traumatizing children.
- OFS will not rely on accompanying adults, including friends and family members to act as interpreters.



BEST PRACTICES

- Brief the interpreter prior to a client meeting
- Speak directly to the client, not to the interpreter (the interpreter will speak in first person, not third)
- Speak clearly and in a normal tone
- Remember to pause between sentences or complete thoughts
- Refrain from using metaphors, acronyms, slang or idioms
- Allow only one person to speak at a time

Questions?

Contact: Maria Arvizu, LEP Coordinator
Phone: 615-880-1154
Email: MariaArvizu@jisnashville.gov

ACTIVATING CHANGE FREE

CONTINUED

3 You will get an email within 24 hours confirming that your request was received. If the request can be filled, you will receive a confirmation email as soon as the assignment is filled.

4 Please submit your request NO LATER than 48 hours in advance. If submitted within 48 hours, service is not guaranteed.

5 If you need to cancel a request, email DeafAccess@activatingchange.org as soon as possible. Put "INTERPRETER REQUEST CANCELLATION" in the subject line and include the following info:

- Date, start/end time of meeting
- Victim Identification Number
- Any other information you consider important

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Office of Homeless Services Year: 2025

Title VI Coordinator: Antonia Whitfield Form Completed By: Antonia Whitfield

Form Completion Date: 6/16/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Training is provided through New Hire onboarding. Each new staff is provided a copy of Title VI and a physical copy of Metro's Civil Service policy which outlines in Section 3.1 equal employment opportunity policies, and complaint procedures against discrimination.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No, I was unable to attend Spring Title VI training on May 21st. I will attend the fall training.

How does your department disseminate Title VI information (including your language access plan) to all employees?

The Title VI of the Civil Rights Act of 1964 is distributed during onboarding. Staff has access to the Language line attended training on how to access the language line in December 2024.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☒ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

☐ Yes ☒ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website
☒ Other We will amend to place procedures on OHS” website

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☒ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☒ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☒ Yes ☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

OHS is in the process of their yearly monitoring of service providers. During the process, staff checks for Title VI postings and interview agency concerning their Title VI process.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Our office policies are currently being finalized to present to Employee Relations, following updates requested by OHS' director.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Parks Year: 2025

Title VI Coordinator: Leigh Anne Lee Form Completed By: Leigh Anne Lee

Form Completion Date: 6/16/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Title VI training is provided as part of the central HR onboarding process and training.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Available through the Human Relations department.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Outside of break areas and on posting boards.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

<https://www.nashville.gov/sites/default/files/2021-07/MHRCDiscriminationComplaintForm02.pdf>

<https://www.nashville.gov/sites/default/files/2021-04/Employee-Complaint-Form.pdf>

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☒ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

The department's EEOC Coordinator has coordinated meetings with a member of the Human Relations team, and has met with members of organizations that provide LAP assistance. She is actively working on the creation of an LAP, which she plans to implement effective 1/1/26.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Planning Commission Year: 2025

Title VI Coordinator: Randi Semrick Form Completed By: Randi Semrick

Form Completion Date: 6/26/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Reviewed on-line training materials through MHRC and will attend next offered training.

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided? Brochure/brochures

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

X Yes No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☒ We have LEP information on our bulletin board in English, Chinese, Spanish and Arabic. An LEP Plan has been started, but not yet completed.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

In main public hallway and employee bulletin board.

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating, and tracking Title VI complaints?

If Yes, please provide it by attaching it to this response.

☒ Yes ☐ No☒ Posted Signs ☐ Website

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Does your department keep a record of all Title VI complaints, investigations, and lawsuits?

☐ Yes ☒ No Have not had a complaint in over 10 years.

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

Date	Status	Action Taken	Summary

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

- ☐ Yes
- ☒ No (The Title VI language is included in the procurement process and contracts as per Metro Finance.)

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

- ☐ Yes
- ☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented? An LEP Plan has been started, but not yet completed.

Minority Representation on Planning or Advisory BodiesWhen a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

- ☐ Yes
- ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Police Year: 2025

Title VI Coordinator: Seth Waltenbaugh Form Completed By: Whitney Heinze/Emily Tatum

Form Completion Date: 6/12/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No 2024

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

New hire orientation in-person sessions

☒ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We have Title VI posters with complaint reporting information in the lobby of each of our facilities.

We also have policy in our manual outlining language line use procedures to assist non-English speaking citizens.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

- MNPD Headquarters
- Central Precinct
- East Precinct
- Hermitage Precinct
- Madison Precinct
- Midtown Hill Precinct
- North Precinct
- South Precinct
- West Precinct
- Property and Evidence Section
- Metro Southeast
- MNPD Training Academy
- Forensic Services Division
- Central Records Division

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

Please see attached for investigating and tracking procedures. Title VI complaints are tracked and maintained in a biased-based policing report annually.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 18

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
4/4/2024	Completed	None	The complainant alleged an officer discriminated against him and his family by blocking him from prosecution. The complaint was investigated and found to be unfounded.
12/23/2024	Completed	None	The complainant alleged an officer charged her with DUI due to her race. The complaint was investigated and found to be unfounded.
08/02/2024	Completed	None	The complainant alleged he was approached by an officer due to his race. The complaint was investigated and found to be not sustained.
05/28/2024	Completed	None	The complainant alleged an officer did not interview a witness due to their race. The complaint was investigated and found to be unfounded.
04/15/2024	Completed	None	The complainant alleged officers on scene stopped him due to his race. The complaint was investigated and found to be unfounded.
03/27/2024	Completed	None	The complainant alleged an officer stopped her due to her race. The complaint was investigated and found to be unfounded.
12/10/2024	Completed	None	The complainant alleged an officer was racist during their interaction on Broadway. The complaint was investigated and found to be exonerated.
02/19/2024	Completed	None	The complainant alleged an officer targeted him because of his race. The complaint was investigated and found to be unfounded.
03/20/2024	Completed	None	The complainant alleged officers targeted him because of his race. The complaint was investigated and found to be unfounded.
04/11/2024	Completed	None	The complainant alleged an officer targeted him due to his race. The complaint was investigated and found to be unfounded.
06/18/2024	Completed	None	The complainant alleged officers targeted her due to her race. The complaint was investigated and found to be unfounded.

06/18/2024	Completed	None	The complainant alleged an officer stopped him due to his race. The complaint was investigated and found to be unfounded.
05/23/2024	Completed	None	The complainant alleged officers were rude and hostile with him because they believed he was Mexican. The complaint was investigated and found to be unfounded.
06/26/2024	Completed	None	The complainant alleged an officer stopped her due to her race. The complaint was investigated and found to be unfounded.
12/28/2024	Completed	None	The complainant alleged an officer questioned her about a hit and run incident due to her race. The complaint was investigated and found to be unfounded.
01/30/2024	Completed	None	Internal employee investigation: The complainant alleged a supervisor treated them poorly due to their race. The complaint was investigated and found to be unfounded.
10/1/2024	Completed	Disciplinary Action	Internal employee investigation: The complainant alleged another employee made discriminatory comments to them. The complaint was investigated and was found to be sustained. The employee resigned in lieu of termination at the conclusion of the investigation.
10/14/2024	In Progress	None	Internal employee investigation: The complainant alleged a supervisor treated them unfairly due to their gender. The complaint is still under investigation.

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☒ Yes

☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

We have subrecipients in our ICAC Grant. We conduct monitoring visits to each entity to ensure they are purchasing the approved equipment or training. We also ensure that they have a Title VI poster posted in their facility for Title VI purposes.

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

Please see attached policy from MNPD Departmental Manual.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

2. The above timelines are not applicable to preliminary inquiries or fact-finding used to determine the need for a formal investigation or to determine the appropriate investigative resource. Additionally, the forty-five (45) calendar day timeline would not apply to cases involving circumstances beyond the control of the investigative unit, e.g., cases pending litigation, requiring covert investigation, or where the employee is not readily available for the investigation to precede.

4.10.030 Investigation of Complaints: Office of Professional Accountability

- A. The Office of Professional Accountability shall review complaints against employees, whether initiated by the public or by a member of the department.
- B. The Director of the Office of Professional Accountability shall be directly accountable to the Chief of Police and the Mayor for the proper administration, general management, and control of all matters related to the operation of that division. The Director of the Office of Professional Accountability has the authority to report directly to the Chief of Police and the Mayor.
- C. The Office of Professional Accountability may initiate an investigation of alleged employee misconduct, with or without a formal complaint, with the prior knowledge and approval of the Chief of Police or designee.
 1. The role of the Office of Professional Accountability is to investigate administrative (departmental) violations, and if during an investigation there are potential criminal violations, the criminal aspect of the investigation will be referred to the appropriate criminal investigative unit.
 2. The Office of Professional Accountability may continue their investigation of the potential administrative violations, as a separate investigation from any criminal investigation. OPA may continue, or have continued, an administrative investigation to assess or establish an administrative duty or omission of duty relevant to the underlying criminal investigation.
 3. The criteria for determining the categories of complaints to be referred to the Office of Professional Accountability may include, but are not limited to: allegations of corruption, brutality, misuse of force, major breach of civil rights and criminal misconduct. When an allegation of misuse of force is reported to the immediate supervisor, it shall be the responsibility of that supervisor to conduct

a preliminary investigation into such allegations before reporting them to the Office of Professional Accountability.

- 4. The Chief of Police shall be informed through the chain of command about major complaints as soon as possible, and no later than the start of the next business day.**
- D. The Office of Professional Accountability may make additional inquiry or use investigative measures deemed necessary to verify, authenticate or clarify the findings and recommendations of a supervisor initiated investigative report. The Office of Professional Accountability may include these findings and disposition recommendations with the report submitted to the Chief of Police and the Deputy Chief or Commander/Director of the involved employee.
- E. The Office of Professional Accountability shall complete an appropriate MNPDP form (311, 313A, 313, or 343) for any investigation initiated by the Office of Professional Accountability where there has been an investigative finding that an employee has violated any policy, procedure, rule or regulation of the Metropolitan Nashville Police Department or the Civil Service rules and regulations. The completed MNPDP form(s) shall accompany the official report.
- F. The Office of Professional Accountability shall have the following additional responsibilities.
 1. Maintain a complaint log,
 2. Maintain a central file of complaints in a secured area and in conformity with records retention requirements from state law,
 3. Conduct a regular audit of complaints to determine the need for changes in training or policy, and report the findings to the Chief of Police and Deputy Chiefs,
 4. Maintain statistical and related information to identify trends involving all complaints of excessive force and abuse of authority, and
 5. Track complaints against individual employees to assist in employee risk analysis.
- G. The Chief of Police and/or Office of Professional Accountability investigators shall keep the complainant informed concerning the status of a complaint, to include:

1. Verification that the complaint has been received for processing.
 2. Status reports regarding the progress of the investigation every thirty (30) calendar days.
 3. Notification of the results upon conclusion.
- H. Investigative reports prepared by the Office of Professional Accountability into allegations of misconduct will include an "Investigative Finding". The "investigative finding" is drawn from the evidentiary facts, and may include recommendations to changes in policies, procedures, rules, and regulations that may prevent future allegations of misconduct, as well as the need to modify or expand training.
- I. The Office of Professional Accountability shall compile an annual statistical summary based on records of employee investigations, to be made available to the public and department employees.

4.10.040 Office of Professional Accountability Records and Confidentiality

- A. The Office of Professional Accountability shall be informed of all final disciplinary decisions.
- B. The case files at the Office of Professional Accountability shall be maintained separately from personnel records.
- C. OPA Investigative Timelines:
1. Active Investigations should be completed within forty-five (45) calendar days from the date the employee has received formal notification that they have become the subject of an internal investigation, or from the date when an employee cannot reach a settlement with his/her supervisor(s) on the allegation, whichever is the later date. Investigations may exceed forty-five (45) calendar days with the approval of the Chief of Police or his designee. The complainant and employee shall be notified of the approved extension request. Unless the circumstances, including, but not limited to, the type of offense and the allegations known to the Department, indicate otherwise, the employee will be notified within ten (10) calendar days of receipt of the complaint. The commander of the Office of Professional Accountability will forward a status report twice monthly of all active cases to the Chief of Police.
 2. The above timelines are not applicable to preliminary inquiries or fact-finding used to determine the need for a formal investigation or

18.90 Interpreter Services – Cell Phone Translators & Language Line

18.90.010 Generally

Personnel should seek others at the scene, such as a neighbor, a friend, or the victim's children as the first avenue of interpretation on routine calls for service. If there is no one at the scene to assist in translating, the Metropolitan Nashville Police Department (MNPd) currently provides two (2) options for police personnel to utilize when communication is necessary with non-English speaking persons:

- A. Utilization of on-duty bilingual personnel;
- B. The Language Line.

18.90.020 Personnel Requiring a Translation

A. On-Duty Bilingual Personnel

Departmental personnel needing a translation will attempt to identify the language that is being spoken. Once the language is determined, officers shall utilize bilingual, on-duty personnel to interpret if available. Provided, the on-duty personnel are able to assist within thirty (30) minutes of the request. If on-duty personnel can assist, they shall contact their supervisor for permission to respond to the requesting officer's location to provide the needed services.

B. Language Line

1. When translation services are needed under emergency conditions, personnel may utilize the Language Line Service, which is an independently maintained interpreter service. Due to the fees charged for use of this service, personnel must adhere to the following criteria before utilizing this service:
 - a. No on-duty bilingual personnel that can speak the required language are available.
 - b. Personnel shall obtain prior approval by their immediate supervisor.
 - c. Personnel shall use the Language Line service only during an emergency incident or urgent situation, and not for protracted interviews or interrogations.
2. The following are generally allowable uses of the Language Line:
 - a. Obtaining information from victims of crimes,

- b. Descriptions of missing persons,
- c. Brief interviews of witnesses, etc.

3. The following are generally prohibited uses of the Language Line:

- a. Detailed interviews of witness,
- b. Interrogations of suspects,
- c. Working non-serious traffic accidents, etc.

4. Language Line Procedures:

- a. Personnel shall contact their immediate supervisor for approval and to acquire the Language Line account number necessary to make the call to the Language Line Service.
- b. When calling the Language Line the following information must be provided to obtain service:
 - 1) The language to be translated.
 - 2) Client identification number. The employee's supervisor can provide his number after the supervisor approves use of the service. Employees shall ensure the security of this number to prevent unauthorized use.
 - 3) The organization name, which is listed as the Metropolitan Police Department of Nashville.
 - 4) The personal code, which is the requesting employee's employee number.

C. Anytime the Language Line is used, MNPDP Form 054, Language Line Interpreter Service Request, shall be completed by the requesting officer, inspected by the employee's supervisor, and the original sent to Records. Copies shall also be forwarded to the Fiscal Affairs Division and the officer's case file, where appropriate.

****See Addendum I for information about current vendors and access numbers for Language Line use****

ADDENDUM I

Language Line Vendors a Basic Guide:

Voiance Language Services – 1st choice
Optimal Phone Interpreters – 2nd choice

A reminder to follow the guidelines listed in 18.90 Interpreter Services – Cell Phone Translators & Language Line

Please complete MNPD form 054 and send the original to Central Records and a copy to Fiscal

Voiance (Primary)

The MNPD has two interpreter accounts (phone numbers) with the Voiance Language Services:

1. 911 Emergency account for emergency situations only
2. Non-Emergency account for all other language services needed

911 emergency account instructions:

- Dial 1-844-292-4210 to access the interpretation services
- Press “1” for Spanish press “0” for all others
- If at any time you wish to speak with a CS representative you can press “0”

Non-Emergency account instructions:

- Dial 1-866-998-0338
- When prompted enter account number: 21243
- Second prompt enter the 4-digit pin number: 0187
- Say the language needed
- Select if you would like to add an additional person to the call
- When the interpreter comes on the line, give the interpreter a brief explanation of the call

Optimal (Secondary)

- Dial 1-877-746-4674 and be prepared to provide
- what language you need
- where you are calling from: Client ID# 6886 or Metro Nashville Police Dept
- Caller Name and Employee Number

18.100 Effective Communications With Individuals With Disabilities

18.100.010 Generally

- A. The Metropolitan Government and the United States Department of Justice have entered into an agreement to achieve compliance with Title II of the Americans with Disabilities Act of 1990. As part of the agreement, the Metropolitan Government will issue specific communication policies for effective communication. These policies have been agreed to by the Justice Department and the Metropolitan Government and are binding for the entire Metropolitan Government.
- B. It is the policy of Metropolitan Government of Nashville and Davidson County to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others. The Metropolitan Government will furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a program, service, or activity conducted by the Metropolitan Government. In determining what type of auxiliary aid or service is necessary, the government will give primary consideration to the requests of the individual with disabilities.
- C. "Auxiliary aids and services" includes:
 - 1. Qualified interpreters, note takers, transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDD's), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments; and
 - 2. Qualified readers, taped texts, audio recordings, Brailled materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments.
- D. Notification
 - 1. A list of available contact persons can be found at 18.100.050. If you do not know which department is sponsoring or responsible for providing the program or service that requires the provision of auxiliary aids or services to ensure effective communication, contact the Metropolitan Government ADA Coordinator.

2. Requests for auxiliary aids or services should be made by the public in advance of the meeting, hearing or other program, service, or activity provided by the Government. For public meetings and hearings, the ADA contact person should be notified at least one week in advance. For on-going services and programs, the ADA contact person should be notified at least 48 hours in advance. For emergencies or urgent requests, the responsible ADA contact person or the Metropolitan Government ADA Coordinator should be notified immediately. The best effort to fulfill the request will be made.

Example 1:

The Precinct Community Coordinator is asked to come to the Women's Auxiliary Group to speak on safety issues concerning parking lot safety. The officer responding to the request for the aforementioned program will make contact with the Women's Auxiliary Group and ask if they have anyone in their audience that would require an "auxiliary aid or service" as it is defined under this policy. Should the group request an "auxiliary aid or service", the officer should notify the department ADA contact person at least one week in advance. Furthermore, the Auxiliary Women's Group will be required to publish in their program notification that the Police Department will accommodate any members with communication disabilities. This notification is required by Title II of the Americans with Disabilities Act of 1990 and will include the notification timeline and procedure as described in the order.

Example 2:

West precinct officers attend the monthly neighborhood watch meeting of the West End Neighborhood Alliance. One of the members of the Alliance suffers from a hearing disability. The officers know that this disability exists and that the member is likely to be present at each meeting. The officers should notify the ADA departmental contact person at least 48 hours in advance. Once again, the Neighborhood Alliance must publish in its newsletter or invitation to its members that the Police Department will accommodate any members with communication disabilities.

Example 3:

East Precinct is going to host an open house around the time of National Night Out Against Crime. In order to comply with Title II of the Americans with Disabilities Act of 1990, the invitations to the public must state that the Department will furnish the appropriate

auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in and enjoy the benefits of the open house. The invitation must also state that such requests for auxiliary aids by members of the public should be made at least one week in advance to the host of the event, (eg. Precinct Commander). The host of the event will then immediately notify the department ADA contact person, who will be responsible for notifying the requesting individual with a disability of the proposed auxiliary aid or service.

NOTE: For all activities, meetings, hearings, programs or services provided by a member of this department an ADA notification must be made. Regardless of whether the department sponsors the event or simply participates as a guest, the public must be made aware in advance that requests for auxiliary aids or services may be made and received to ensure effective communication.

E. Government Response

1. When an auxiliary aid or service is required to ensure effective communication, the government will provide an opportunity for an individual with disabilities to request the auxiliary aid or service of their choice. Primary consideration shall be given to the preference expressed by the individual. "Primary consideration" means that the government will honor the choice, unless it can show that another equally effective means of communication is available, or that the requested source would result in a fundamental alteration in the service, program, or a financial burden. The ADA contact person will consult with the individual with the disability to identify the nature of the aid or service and determine the most effective way to accommodate the request. The ADA contact person may ask the requesting individual clarifying questions to obtain a particular auxiliary aid or service.
2. Within 48 hours after the request, the ADA contact person will, in writing, notify the requesting individual with a disability of the proposed auxiliary aid or service to be provided. A copy of the proposal will be sent to the Metropolitan Government ADA Coordinator.

F. Grievance Procedures

If the requesting individual with a disability is dissatisfied with the ADA contact person's proposed auxiliary aid or service, the individual is encouraged to file a grievance with the Metropolitan Government ADA

Coordinator. The coordinator will promptly contact the individual in person or by telephone and attempt to resolve the grievance within one week.

18.100.020 Guidelines for Training on Effective Communication in Police Situations Involving Individuals with Hearing Impairments

- A. Successful police contact with citizens is characterized by effective communication between the parties whether it is a suspect, victim, or complainant with whom the officer is talking. As such, police officers encountering an individual with hearing impairment should use appropriate auxiliary aids and services whenever necessary to ensure effective communication with the individual.
- B. Auxiliary aids and services include qualified interpreters, written materials, note pads, and other effective methods of making aurally delivered materials available to individuals with hearing impairments.
- C. When an auxiliary aid or service is required to ensure effective communication, the Metropolitan Government Police Department must provide an opportunity for individuals with hearing impairments to request the auxiliary aids and services of their choice and must give primary consideration to the choice expressed by the individuals. "Primary consideration" means that the Metropolitan Government Police Department must honor the choice, unless it can show that another equally effective means of communication is available, or that use of the means chosen would result in a fundamental alteration in the nature of its service, program, or activity or in undue financial and administrative burdens.
- D. Police contact with citizens occurs most frequently during routine traffic stops. In situations involving drivers who are deaf and use sign language for communication, the officer should use appropriate sign language to initiate the exchange with the driver and should explain in writing the necessity for a stop and citation if the driver is to be charged with a traffic violation. The officer may not ask a family member or friend of the driver to interpret.

Example: An officer sees a vehicle run a stop sign. The officer pulls the vehicle over and when approaching the vehicle realizes that the driver is attempting to communicate with the officer by way of sign language. If the officer has received training in sign language, he/she will communicate to the driver that he/she will communicate by written means. If the officer has not been trained in sign language, he/she will use pen and paper to communicate with the driver. The officer will not ask a family member or friend of the driver to interpret.

1. If the officer is successful in communicating with the driver by way of note pad, he/she may issue the citation and release the driver.
2. If the officer is unsuccessful in communicating with the driver by way of sign language or writing and the driver can be cited and released without being questioned, then the driver does not need to be provided with an interpreter.
3. If the officer is unsuccessful in communicating with the driver by way of sign language or writing and the driver does not understand the nature of the non-criminal (example Metro Citation) infraction, then the officer should contact his/her immediate supervisor. The supervisor should use discretion as to whether to call a qualified interpreter to the scene or whether to issue a warning rather than a citation.
4. However, if the officer approaches the vehicle and sees, for example, a felony amount of crack cocaine on the back seat and arrests the driver based upon probable cause, the officer does not need to provide a qualified interpreter if he does not need to interview the driver prior to, or subsequent to, the arrest.
5. If however, under the felony cocaine example, the officer is unable to relate the nature of the criminal charge to arrestee by sign language, note pad or other means, the arrestee should be transported to booking and held until the arresting officer can convey the information to the arrestee through a qualified interpreter.

These guidelines address only those situations where a police officer, after consulting with the individual with a hearing impairment, determines that the services of a qualified interpreter are necessary to ensure effective communication.

NOTE: When an officer learns that an auxiliary aid or service is necessary to ensure effective communication with an individual with a hearing impairment, the department will allow the individual to request the auxiliary aid or service of their choice and must give foremost consideration to the individuals choice. This means that the department will honor the individual's choice unless: it would cause an undue financial and administrative burden on the department; it would significantly change the nature of the service, program or activity or another equally effective means of communication is available.

E. Arrest Upon Probable Cause Without An Interview

1. In circumstances where an individual without a hearing impairment would have been arrested on probable cause without an interview, then a suspect with a hearing impairment in the same situation usually does not need to be provided with a qualified interpreter.
2. However, a qualified interpreter may be required if an officer is unable to convey to the arrestee the nature of the criminal charges by communicating on a note pad or by using another means of communication. The arrestee should be transported to a holding cell where either the arresting officer or the transporting officer can convey the information through the interpreter when he or she arrives.

F. Interrogating an Arrestee With a Hearing Impairment

If an officer cannot effectively inform the arrestee of the Miranda warnings without the use of an interpreter, then the officer must secure the services of a qualified interpreter in order to communicate accurately the warnings to the arrestee prior to any interrogation. The interrogation will not proceed until the services of an interpreter are secured.

G. Issuance of Appearance Ticket

In circumstances in which an individual without a hearing impairment would be issued an appearance ticket without being questioned by the investigating officer, then a suspect with a hearing impairment in the same situation does not need to be provided with a qualified interpreter. If an officer has stopped a suspect for committing a non-criminal infraction and if the officer is unable to convey to the violator the nature of the non-criminal infraction by communicating on a note pad or by using another means of communication, then the officer should notify his/her immediate supervisor and they should use discretion as to whether to call a qualified interpreter to the scene or whether to issue a warning rather than a citation.

H. Interviewing a Victim or Critical Witness with a Hearing Impairment

If an officer is able to communicate effectively by writing questions on a note pad and having the victim or witness with a hearing impairment write his or her responses, then the officer may proceed with the interview using a note pad. However, if an investigating officer is

unable to communicate effectively with a victim or critical witness by using a note pad or some other means of communication other than a qualified interpreter, then the investigating officer must provide the victim or critical witness with a qualified interpreter.

I. Obtaining Qualified Interpreters

Officers will contact their immediate supervisor who will arrange for a qualified interpreter from the approved contractor list, and request that a qualified interpreter be provided. If the person requests an interpreter other than from the contractor, the request should be honored if the interpreter is available and qualified.

A. Reports/Evidence

All identifying information on the interpreter must be included on an offense or supplemental report, including the interpreter's name, the time the interpreter was called, and his/her time of arrival and departure. All written questions and responses between and among police officers and persons with hearing impairments must be treated as evidence and handled accordingly.

18.100.030 Policy on Access to Emergency Communications Services

A. Dialing 911 is the most familiar and effective way Americans have of finding help in an emergency. The Americans with Disabilities Act (ADA) requires all Public Safety Answering Points (public safety answering points) to provide direct, equal access to their services for people with disabilities who use teletypewriters (Teletypewriters), which are also known as 'telecommunications devices for the deaf (TDDs)."

B. Direct Equal Teletypewriter Access

1. General Requirements for Telephone Emergency Service Providers:

- a. The ADA regulation requires 9-1 -1 or other telephone emergency service providers to provide teletypewriter users with: direct access; and an opportunity to benefit from the emergency services that is equal to the opportunity afforded others.
- b. Direct access means that public safety answering points can directly receive teletypewriter calls without relying on an outside relay service or third-party services.

- c. Equal access means that the telephone emergency services provided for teletypewriter users are as effective as those provided for persons who make voice calls, in terms of:
 - (1) Response time;
 - (2) Response quality;
 - (3) Hours of operation; and
 - (4) All other features offered (e.g., automatic number identification, automatic location identification, automatic call distribution).
- d. Direct equal access requires public safety answering points to have the appropriate equipment to communicate with people who use teletypewriters. It also requires them to use the proper procedures and practices when teletypewriter calls are received.

2. Equipment

In order to afford equal access to teletypewriter users, every call-taking position within a public safety answering point must have its own teletypewriter or teletypewriter-compatible equipment. Public safety answering points must have systems that enable call takers to handle teletypewriter calls as properly, promptly, and reliably as voice calls.

3. Other Requirements for Teletypewriter Equipment – Maintenance and Back up

The ADA regulation contains a specific provision requiring that covered entities maintain their accessibility features and equipment in operable working condition. In addition to this specific maintenance requirement, the ADA's equal access requirement obligates Public safety answering points to implement equally effective procedures for maintenance and back-up capability for teletypewriter equipment as they provide for voice telephone equipment.

4. Switching Between Voice and Teletypewriter Modes

All call takers must have the capability to switch back and forth easily from teletypewriter mode to voice mode during the same call. This capability is necessary especially for silent calls, since call takers are required to first query the line by voice and then quickly switch to query the line by teletypewriter. This capability is also

necessary for voice carryover and hearing carryover, which are described below. Voice carryover and hearing carryover shorten the lengths of calls that would otherwise be conducted exclusively by typing. Call takers who use stand-alone Teletypewriters can switch from teletypewriter mode back to voice mode simply by removing the telephone handset from the teletypewriter couplers. Teletypewriter-compatible consoles for call takers should have built-in switching capability.

5. Voice Carryover

It is a communication hybrid of teletypewriter and voice. Voice carryover allows a person with hearing loss to speak directly to the call taker and read the response that is typed back. Many persons who became deaf or hard of hearing later in life prefer to speak instead of type. They use what is called voice carryover. With voice carryover, the caller speaks directly into the phone, and the call taker types back via teletypewriter to the caller. Voice carryover can be accomplished with standard stand-alone teletypewriter equipment simply by having the call taker alternate between listening on the handset when the caller is speaking and placing the handset in the teletypewriter couplers to type a response.

6. Hearing Carryover

People with speech impairments who are not deaf or hard of hearing often prefer hearing carryover. Hearing carryover allows them to type their words on a teletypewriter to call takers and hear call takers' spoken responses through their handset. Hearing carryover can be accomplished by a call taker using standard stand-alone teletypewriter equipment by alternating speaking into the handset and placing the handset in the teletypewriter when the caller types a response.

7. Procedures for Handling Teletypewriter Calls

- a. In addition to proper equipment, direct, equal access for teletypewriter calls requires that public safety answering points use effective procedures for recognizing and responding to teletypewriter calls. Recognizing teletypewriter calls/treating silent, open lines as potential teletypewriter calls
- b. All call takers must be able to recognize and handle teletypewriter calls properly. There are three types of teletypewriter calls a call taker may receive. Some Teletypewriters emit a recorded spoken announcement to the

call taker that a teletypewriter call is being placed, such as "hearing impaired caller use teletypewriter." Other times, teletypewriter callers may press teletypewriter keys to emit audible tones and more quickly notify the call taker that a teletypewriter call is being placed. Most often, however, a person using a teletypewriter will make a call that is perceived by the call taker as a silent, open line call. This is because the caller's equipment does not recognize that the call has been answered until the call taker sends a teletypewriter response.

- c. The only way for public safety answering points to properly identify all teletypewriter calls is for call takers to recognize teletypewriter tones and to query every silent, open line call with a teletypewriter to determine if it is a teletypewriter call after it has been queried by voice.

8. Conducting Teletypewriter Calls

After teletypewriter calls are recognized, call takers must effectively communicate with callers during the calls. Effective communication by teletypewriter will require call takers to be familiar with the use of teletypewriter equipment and teletypewriter protocols.

9. Training

- a. Public safety answering points must train their call takers to effectively recognize and process teletypewriter calls. Call takers must be trained in the use of teletypewriter equipment and supplied with information about communication protocol with individuals who are deaf or hard of hearing, or who have speech impairments. For instance, callers who use American Sign Language use a syntax that is different from spoken English. In addition, in teletypewriter communication, certain accepted abbreviations are frequently used.
- b. The ADA does not specify how call takers must be trained, but the department believes that the following are essential to proper training:
 - (1) Training should be mandatory for all personnel who may have contact with individuals from the public who are deaf, hard of hearing, or who have speech impairments.
 - (2) Public safety answering points should require or offer refresher training at least as often as they require or offer training for voice calls, but at a minimum, every six months.

10. Comprehensive Training Should Include:

- a. Information about the requirements of the ADA and Section 504 of the Rehabilitation Act for telephone emergency service providers;
- b. Information about communication issues regarding individuals who are deaf or hard of hearing, or who have speech impairments, including information about American Sign Language;
- c. Practical instruction on identifying and processing teletypewriter calls, including the importance of recognizing silent teletypewriter calls, using proper syntax, abbreviations, and protocol when responding to teletypewriter calls and relayed calls; and
- d. Hands-on experience in teletypewriter communications, especially for new call takers, as part of their initial training orientation.
- e. To ensure the effectiveness of training, public safety answering points may want to consult the Emergency Access Self-Evaluation program, published as a manual by Telecommunications for the Deaf, Inc., under a Department of Justice grant. The EASE manual, which was reviewed by the Department, can be obtained for a fee by calling TDI at (301) 589-3786 (voice), (301) 589-3006 (teletypewriter), or (301) 589-3797 (FAX).

11. Testing

- a. 911 experiences have shown that frequent testing is essential to ensure direct, equal access. Testing call takers and their equipment is also the one of the most effective ways to ensure compliance with the ADA's requirement that accessibility features are maintained in operable working condition. The tests should be designed to ascertain whether teletypewriter equipment functions properly and whether personnel have been adequately trained to recognize teletypewriter calls quickly, to operate teletypewriter equipment, and to conduct teletypewriter conversations.
- b. To test whether call takers have been trained adequately to recognize teletypewriter calls, a public safety answering point should conduct two types of test calls--silent, open line calls in

which no tones are emitted and calls in which the caller introduces the call by transmitting teletypewriter tones. Tests should be unannounced.

18.100.040 Legal Assistance and Support

Assistance and advice regarding compliance with the Americans with Disabilities Act may be obtained from the department ADA coordinator or the Metropolitan Department of Law.

18.100.050 Contact Persons

A. Metropolitan Government Americans with Disabilities Coordinator:

ADA Coordinator
222 3rd Avenue North
Nashville, TN 37201
Phone: (615) 862-6640
FAX: (615) 862-6654

B. Metropolitan Police Department Americans with Disabilities Contact Person

Human Resource Manager
Phone: 862-7351
FAX: 880-2997

C. Contract Vendors Who Provide Interpreter Services

Bridges
Monday – Friday 0800-1700 615-248-8828
All other hours of service: 615-244-0979

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Public Defender Year: 2025

Title VI Coordinator: Sherlaine Emmons Form Completed By: Sherlaine Emmons

Form Completion Date: Click or tap to enter a date.

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☐ No

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes☐ No

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



METROPOLITAN PUBLIC DEFENDER

Authority

The Title VI Coordinator for the Public Defender's Office handle questions, concerns, complaints, or requests for additional information regarding Title VI of the Civil Rights Act. The Coordinator ensures the Office provides public notification of rights under Title VI, maintains a Title VI complaint log, and ensures that all complaints will be investigated thoroughly. The following person has been designated as this department's Title VI Coordinator:

Sherlaine Emmons, Administrative Services Division Manager
Office of the Metropolitan Public Defender
150 2nd Ave N, Suite 400
Nashville, TN 37201
Phone: (615) 880-3711
Fax: (615) 214-9979

Organizational Environment

Mission Statement – The mission of the Metropolitan Public Defender's Office is to defend the liberty, honor and constitutional rights of the individuals, of all ages, whose cases have been entrusted to us. Through zealous advocacy, we strive not only to deliver excellence in our representation of each and every client, but also to stand with our clients and the community in working to create a more just, fair and compassionate legal system.

Strategic Goals:

Provide high quality effective legal representation to every client we serve.

Serve as a consistent champion in the criminal justice system and the city for fair, just and lawful treatment of the criminally accused.

Federal Funding

The Public Defender's Office currently does not receive federal funding.

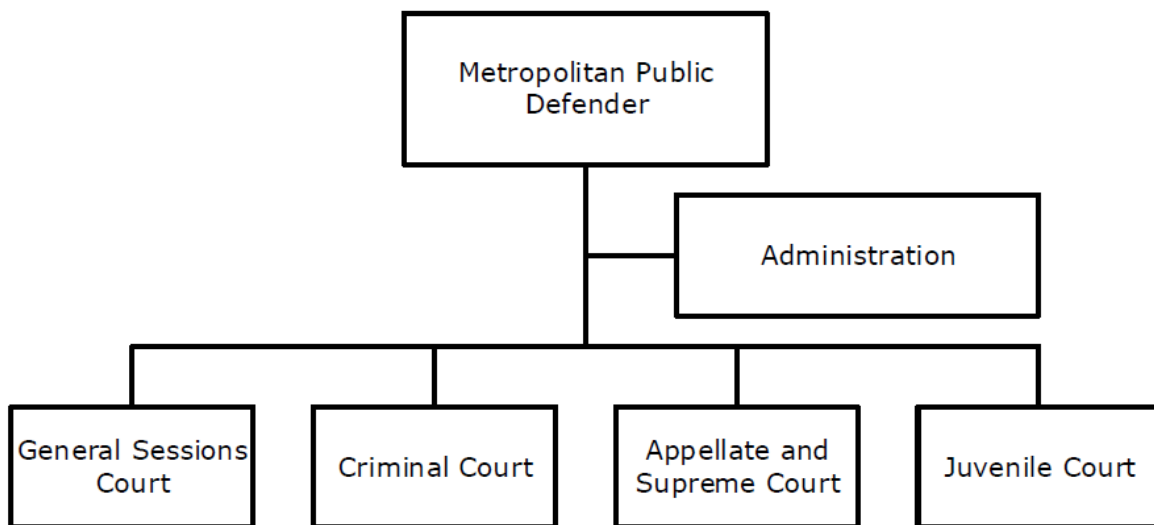
Contracted Program Overview

The Public Defender's Office has no contracted programs.

Organizational Chart

The Title VI Coordinator is a member of the Administration group. See organizational chart included below.

Metropolitan Public Defender Organizational Chart



Minority Participation on the ___X___ Not applicable _____ Board/Commission.

Number of Complaints Received Last Year- 0

Submitted June 5, 2025

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Public Library Year: 2025

Title VI Coordinator: Susan Drye Form Completed By: Susan Drye

Form Completion Date: 6/26/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Public Library New Employee Orientation, then annually online.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via departmental email. All information that is needed to push out to the library system is posted on the Public Library's Intranet, INK. Also, the form with our language access list is on INK.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

Title VI Complaint Procedure

☐ Yes ☒ No

If No, do you refer all complaints to the Metro Human Relations Commission?

How does your department communicate information about the complaint procedure to the public?

☒ Other If the library receives a Title VI complaint, either library administration or library HR will refer the complainant to the Metro Human Relations Commission.

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

Date	Status	Action Taken	Summary

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that "subrecipient" for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes ☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes ☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Nashville Public Library (NPL) is in the process of developing a Written Language Plan. NPL plans to implement in FY26.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☒ Yes ☐ No

If Yes, provide a table depicting the membership of that body broken down by race...

Name	Race
Joyce Searcy	Black or African American
Keith Simmons	White
Rosalyn Carter	Black or African American
Charvis Rand	Black or African American
Katy Varney	White
Dr. Nadine De La Rosa	Black or African American
Kate Ezell	White

	Select an Item

[Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.](#)

Nashville Public Library Board is comprised of 7 members, recommended by the mayor, and approved by a majority of Metro Council. They are appointed to 4-year terms and annually the board members vote on the Chair, Vice-Chair, and Secretary.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Sheriff Year: 2025

Title VI Coordinator: M. Travis/ M. Cook Form Completed By: M. Cook

Form Completion Date: 5/15/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

Scenario based training, In all new-hire orientation.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Via our Title VI Policy and New Hire Orientation

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Information is located in all public entrances on DCSO electronic information boards.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☐ Website

☒ Other Policy 1-1.154 Title VI Compliance for Inmates/Public, which is publically accessible under open records requirements.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period?

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
3/22/2024	Completed	None	Inmate Earnest Washington requested to be moved, no record of grievance or request found in JMS. Inmate was moved. Not a Title VI Complaint
4/3/2024	Completed	None	Inmate Earnest Washington stated he was not selected for a program due to his age. Inmate was moved and enrolled in a program. Not a Title VI Complaint
5/2/2024	Completed	None	Inmate Sherrod Burnett stated he didn't receive a razor. This is not a Title VI Complaint.
5/14/2024	Completed	None	Inmate Donnell Johnson complained about receiving a 10 day disciplinary for sexual behavior. This is not a Title VI complaint.
9/26/2025	Completed	None	Inmate Gregory Wilson complained his apps wasn't returned to his inmate tablet after 30 day lock down. This is not a Title VI complaint.
12/2/2025	Completed	None	Inmate Brandon Sanders complained the DCSO is slandering his name. This is not a Title VI compliant

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



 NASHVILLE SHERIFF DAVIDSON COUNTY SHERIFF'S OFFICE Daron Hall, Sheriff	<u>Chapter</u> Administration and Management	<u>Page</u> 1 of 4
	<u>Title</u> Title VI Compliance for Inmates/Residents and the Public	<u>Effective Date</u> 8/23/24
<u>Index Number</u> 1-1.154	<u>Related Standards</u> PREA 115.16 b, c	<u>Approved By</u> 
<u>Supersedes</u> Policy # 1-1.154	<u>Title</u> Title VI Compliance for Inmates/Residents and the Public	<u>Prior Effective Date</u> 7/7/23

POLICY

The Davidson County Sheriff's Office (DCSO) complies with Title VI of the Civil Rights Act of 1964, which prohibits exclusion from participation in, denial of the benefits of, or discrimination in, program participation on account of race, color, or national origin. The agency takes reasonable steps to provide inmates/residents and the public with limited English proficiency (LEP) equivalent access to DCSO-managed programs and services, and ensures they have equivalent opportunities to participate in or benefit from efforts to prevent, detect, and respond to sexual abuse/harassment. **PREA 115.16b**

Although this policy is written from a correctional perspective about inmates and officers, the procedures also generally apply to the residential facility and its residents and technicians.

DEFINITIONS

Language Line – A resource that provides translation services via the telephone.

Limited English Proficiency (LEP) Individual – A term that describes people who do not speak English as their primary language and have limited ability to read, write, and/or understand English.

Qualified Interpreter – A person certified or registered to translate the words someone is using effectively, accurately, and impartially with any necessary specialized vocabulary.

Prison Rape Elimination Act (PREA) – A federal law related to the elimination, reduction, response to, and detection of sexual abuse/harassment of inmates.

Title VI of the Civil Rights Act of 1964 – A federal law requiring that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

PROCEDURAL GUIDELINES

DCSO's Title VI coordinator for employees is a member of the human resources division, and investigates employee Title VI complaints as outlined in DCSO Policy # 1-1.300, "Workplace

OFFICIAL

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Harassment/Discrimination.” The Title VI coordinator for inmates and the public investigates Title VI complaints as outlined below.

The DCSO provides resources such as contracted language line services, interpreters, signs, and bilingual literature to LEP inmates, including those who speak languages other than Spanish. The intake officer identifies LEP arrestees and stamps their paperwork accordingly. The prisoner processor adds that information to the arrestee’s record in the Jail Management System (JMS) during processing.

In the booking area, short audio-visual presentations in English and Spanish explain basic facility rules and procedures, how to report sexual abuse/harassment, and how to access services. The inmate handbook is available on inmate tablets/kiosks in English, Spanish, and Arabic in correctional housing areas. Residents receive copies of program rules in the appropriate language during orientation.

The DCSO offers programs and services such as treatment and integrated education and training in English and other languages as required. Community partners offer twelve-step meetings and religious programs in foreign languages if available.

The DCSO communicates information about accessing health care services and the grievance system verbally and in writing in a language easily understood by the inmate.

Language Line

Employees may access information about language line services via a designated folder on the DCSO shared drive. The folder contains a language identification guide, directions on how to use the language line, and tips for working with an interpreter.

An employee obtains approval from the area supervisor before utilizing the language line. Contracted vendors are required to provide their own access to appropriate translation services.

Personnel document calls to the language line in the “Language Line Log” designated folder on the shared drive. The log includes the date of the call, caller’s name, inmate’s name/OCA number or name of civilian needing the service, the facility and area where the call originated, the language needing translation, and the interpreter’s identification (ID) number.

Interpreters

The DCSO does not rely on inmate interpreters, readers, or other inmate assistance when dealing with sexual abuse/harassment complaints unless an extended delay in obtaining an effective interpreter could compromise safety, the performance of first-responder duties, or the investigation of the allegation. **PREA 115.16c**

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When needed, the DCSO Title VI coordinator for inmates contacts the Metropolitan Government (“Metro”) Title VI coordinator to arrange for qualified interpreter services from outside the agency. For information about the process an attorney uses to request access to a correctional/residential facility for a qualified interpreter to accompany the attorney/designee, see DCSO Policy # 1-5.420, “Inmate Visitation.”

DCSO Title VI Coordinator for Inmate/Public Complaints

A member of the standards division coordinates non-employee Title VI complaint investigations. The coordinator/designee conducts Title VI compliance training during annual core training and new-hire orientation. Standards division personnel monitor Title VI compliance during annual assessments and training, and submit reports to the Metro Title VI coordinator as requested.

Complaints

Individuals may file Title VI complaints with the DCSO or the Metro Title VI coordinator, who is a member of the Metro Human Relations Commission. The individual may file a Title VI complaint up to 180 days after the fact.

An inmate’s case manager provides the “Civil Rights Title VI Discrimination Complaint” form upon request. The case manager reviews the complaint, provides a copy to the inmate, and forwards it to the standards division if it is based on race, color, or national origin. For residents, technicians perform the case manager functions outlined above. Standards division personnel log all Title VI complaints and their resolutions in the Title VI log on the shared drive. The log includes information such as the complainant’s name, date of complaint, and basis for complaint.

Within three working days of receiving a complaint, the DCSO coordinator/designee acknowledges receipt of the complaint in writing to the civilian complainant or via an email to the inmate’s case manager/resident’s technician.

The DCSO coordinator/designee reviews the complaint and investigates as needed. The coordinator/designee does not investigate complaints that are clearly not related to race, color, or national origin, but does include them in the Title VI log. The coordinator/designee writes “Not a Title VI Discrimination Complaint” on the form, and returns it to the complainant with a memo that explains what Title VI includes and informs the complainant how to pursue the complaint. If an investigation is warranted, the coordinator/designee completes it within 60 days.

If standards division personnel determine a Title VI violation occurred, they send a copy of the investigative packet to the appropriate deputy chief and administrative counsel, one of whom will implement changes to address the Title VI violation, and make additional notifications as needed. Administrative counsel review the investigative packet before standards division personnel forward it to the Metro Title VI coordinator.

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The DCSO coordinator provides a copy of the final complaint resolution to the complainant, the inmate's case manager/resident's technician, and the facility administrator. Standards division personnel keep a copy on file and forward one to the records division for the inmate's institutional record.

OFFICIAL

Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Social Services Year: 2025

Title VI Coordinator: Yuri L. Hancock Form Completed By: Yuri L. Hancock

Form Completion Date: 6/4/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Training is provided during the Onboarding process and New Hire Orientation

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We post signage in the common areas of the building in various languages; we utilize the Language Line for interpreter services; we also provide training during new hire orientation as well as at the annual program in-service trainings.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Do you provide this in languages other than English?

Title VI Complaint Procedure

☐ Yes ☒ No

If No, do you refer all complaints to the Metro Human Relations Commission?

How does your department communicate information about the complaint procedure to the public?

☐ Other☒ Yes ☐ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? **None**

Date	Status	Action Taken	Summary

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Metro Social Services has no formal written plan, however, we follow the practice of utilizing the most recent vendor list for interpreter and translation services for the customer.

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Sports Authority Year: FY25

Title VI Coordinator: Melissa Wells Form Completed By: Melissa Wells

Form Completion Date: 6/16/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Access is provided to training materials.

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Information is shared with staff through staff meetings and links to additional resources.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

150 2nd Avenue, North, Nashville, TN 37201

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☒ No

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes ☐ No

☐ Posted Signs ☐ Website

☒ Other The Title VI Coordinator for the Sports Authority responds to questions, concerns, complaints, and requests for information.

☒ Yes ☐ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 0

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☐ Yes N/A ☐ No

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

☐ Yes N/A ☐ No

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes N/A ☐ No[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

N/A



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: State Fair Board Year: 2025

Title VI Coordinator: Kristi Harris Form Completed By: Kristi Harris

Form Completion Date: 5/13/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☐ Yes ☒ No

Does your department provide Title VI training to all new employees?

☐ Yes ☒ No

If so, how is the training provided?

☒ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

☒ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☐ Yes ☒ No

List all locations where the notice is posted:

☐ Yes ☒ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

If Yes, please provide it by attaching it to this response.

☐ Yes ☒ No

☐ Posted Signs ☐ Website

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☒ No

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☐ Yes☒ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes☒ No

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Trustee Year: 2025

Title VI Coordinator: Nicholas Garvin Form Completed By: Nicholas Garvin

Form Completion Date: 6/17/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Annual Staff Training with Title VI specific portions

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Displayed signage in public/private spaces, staff training and knowledge of 3rd party services

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Physical Signage

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

If Yes, please provide it by attaching it to this response.

☒ Yes ☐ No☒ Posted Signs ☐ Website☐ Other☒ Yes ☐ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

☐ Yes ☒ No

Language Access to Persons who are limited English Proficient

☐ Yes ☒ No

Working with UT-IPS – TN Language Center to assist

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

☐ Yes ☒ No[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: Water Services Year: 2025

Title VI Coordinator: Juanita Davis Form Completed By: Juanita Davis

Form Completion Date: 6/19/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

During New Hire Orientation thru video

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year? **Completed training online.**

☒ Yes ☐ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

We have information posted in all areas

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

All Metro Water Services buildings

☒ Yes ☐ No

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☐ Yes ☒ No

If No, do you refer all complaints to the Metro Human Relations Commission?

☒ Yes ☐ No

How does your department communicate information about the complaint procedure to the public?

☐ Posted Signs ☐ Website

☒ Other If the information is requested, we would send it out.

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☐ Yes ☒ No

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☒ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? none

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

[illegible]

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☐ Yes☒ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes☐ No

If Yes, please provide it by attaching it to this response.

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes

☒ No Not that I am aware of

If Yes, provide a table depicting the membership of that body broken down by race...

[illegible]

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.



Metropolitan Government of Nashville and Davidson County
Title VI Questionnaire

Department: WeGo Year: 2025

Title VI Coordinator: Felix Castrodad Form Completed By: Philip Randall

Form Completion Date: 6/16/2025

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive federal financial assistance. Title VI states that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Government requires all entities that receive federal financial assistance to develop training, procedures, and practices that ensure compliance with Title VI. To that end, Metropolitan Government of Nashville and Davidson County collects and annually updates the information requested below.

Training

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training in any of the last three years?

☒ Yes ☐ No

Does your department provide Title VI training to all new employees?

☒ Yes ☐ No

If so, how is the training provided?

Presentation and videos during onboarding orientation

☐ Not Provided

*If you have written training material, please provide it by attaching it to this response.

Metro's Title VI compliance plan relies on Coordinators in each department to lead efforts in their department. To do this effectively, the Metro Human Relations Commission offers an annual training for departmental Title VI Coordinators.

Did your department Title VI Coordinator attend the annual training for the current year?

☐ Yes ☒ No

How does your department disseminate Title VI information (including your language access plan) to all employees?

Posted on bulletin boards in all building facilities and inside all buses. Title VI program is available on the agency's website.

☐ We Do Not

Notice to Beneficiaries of Protection under Title VI

Does your department provide information to the public regarding your Title VI obligations, the protections against discrimination afforded to by Title VI, and how complaints can be filed?

☒ Yes ☐ No

List all locations where the notice is posted:

Admin and Maintenance facilities. On all WeGo buses, Elizabeth Duff Transit Center at WeGo Central, Dr. Ernest Rip Patton, Jr. North Nashville Transit Center and the Hillsboro Transit Center.

Do you provide this in languages other than English?

☒ Yes ☐ No

Title VI Complaint Procedure

Does your department have a written procedure for accepting, investigating and tracking Title VI complaints?

☒ Yes ☐ No

If Yes, please provide it by attaching it to this response.

The forms and process for filing complaints can be accessed at - <https://www.wegotransit.com/about-us/civil-rights/>

If No, do you refer all complaints to the Metro Human Relations Commission?

☐ Yes ☐ No We may refer a complaint to Metro Human Relations Commission if specific support is needed.

How does your department communicate information about the complaint procedure to the public?

☒ Posted Signs ☒ Website

☐ Other

Do you provide this complaint procedure in languages other than English, pursuant to language access plan?

☒ Yes ☐ No

Record of Title VI Complaints, Investigations and Lawsuits

Does your department keep a record of all Title VI complaints, investigations and lawsuits?

☐ Yes ☐ No

How many Title VI complaints, investigations and lawsuits did you have this annual reporting period? 2

For each complaint, list the date that the investigation, lawsuit or complaint was filed; the status of the investigation, lawsuit or complaint; action taken in response to the investigation, lawsuit or complaint; and a summary of the allegation(s).

Date	Status	Action Taken	Summary
4/30/2025	Completed	Verbal	The complaint was related to WeGo’s Access service. It was investigated and determined not to be a Title VI issue but rudeness of another passenger. It was referred to the Access department who talked to the driver about intervening when arguments occur. The Access departments will no longer schedule the two passengers on the same vehicle anymore.
4/21/2025	Completed	None	Passenger filed a complaint about harassment by security personnel at the bus terminal. When contacted about it, the passenger became upset about his email address showing on the email and wanting to remain anonymous and did not want me to check on his complaint. I sent the link to the complaint form and notified the ADA coordinator as he mentioned he was disabled. He became verbally aggressive and

			accusatory on emails after contact. The person ceased contact and did not want to talk to WeGo anymore.
11/4/2024	Completed	Verbal	Customer complained about being discriminated against by this customer service desk employee at the bus station, having been called “faggot” and his disability card being destroyed. The complaint was also referred to Human Relations Commission. WeGo staff looked at video and there wasn’t evidence of those word used by customer care rep. The complaint was closed on both WeGo’s and HRC end.
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	
Select a Date	Select a Status	Select an Action	

Monitoring Subrecipients

If your department receives federal financial assistance from a primary source (such as the federal or state government) and then distributes any part of that assistance to another entity, you have an obligation to monitor that “subrecipient” for Title VI compliance. Subrecipients may be contractors, subcontractors or grantees.

Do you distribute any of the federal financial assistance you receive to a subrecipient (contractor, subcontractor or grantee)?

☒ Yes

☐ No

If Yes, how do you monitor subrecipients for compliance with Title VI obligations?

Procedures outlined on attached Title VI Program, Chapter 2, Section E.b. – Monitoring Subrecipients (pages 22-23)

Link to the Plan: https://www.wegotransit.com/assets/1/24/MTA_Title_VI_Program_2022_FINAL.pdf

Language Access to Persons who are limited English Proficient

Title VI requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities by eligible persons with limited English proficiency. This generally means that departments should adopt a language access plan that provides guidance to all staff on when and how to provide language assistance to constituents who are limited English proficient.

Does your department have a written language plan?

☒ Yes

☐ No

If Yes, please provide it by attaching it to this response.

The plan can be found here (Pages 14-22) https://www.wegotransit.com/assets/1/24/MTA_Title_VI_Program_2022_FINAL.pdf

If No, please state what steps your department is taking to adopt a policy and when the policy will be implemented?

Minority Representation on Planning or Advisory Bodies

When a department selects community members for planning or advisory committees related to a program or service supported by federal financial assistance, the selection process should not deny an individual on the basis of race, color, or national origin the opportunity to participate.

Did your department select members for any non-elected planning or advisory committees related to any program or service supported by federal financial assistance?

☐ Yes ☒ No

*Note - The MTA Board members are appointed by the mayor and confirmed by Metro Council. They are not selected by MTA

If Yes, provide a table depicting the membership of that body broken down by race...

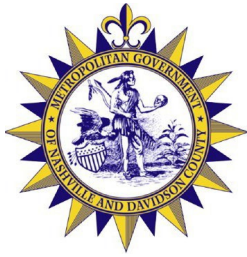
Name	Race
Gail Carr Williams (MTA Board of Directors)	Black or African American
Jessica Dauphin (MTA Board of Directors)	White
Aron Thompsom (MTA Board of Directors)	Black or African American
Kathryn Hays Sasser	White
Jeffrey Haynes	White
	Select an Item
	Select an Item
	Select an Item

Please provide a description of the process the agency uses to encourage the participation of minorities on such committees.

Direct outreach to the impacted community with assistance from elected officials, business leaders, and community groups.

Appendix A: Metro Government of Nashville and Davidson County Title VI Coordinators

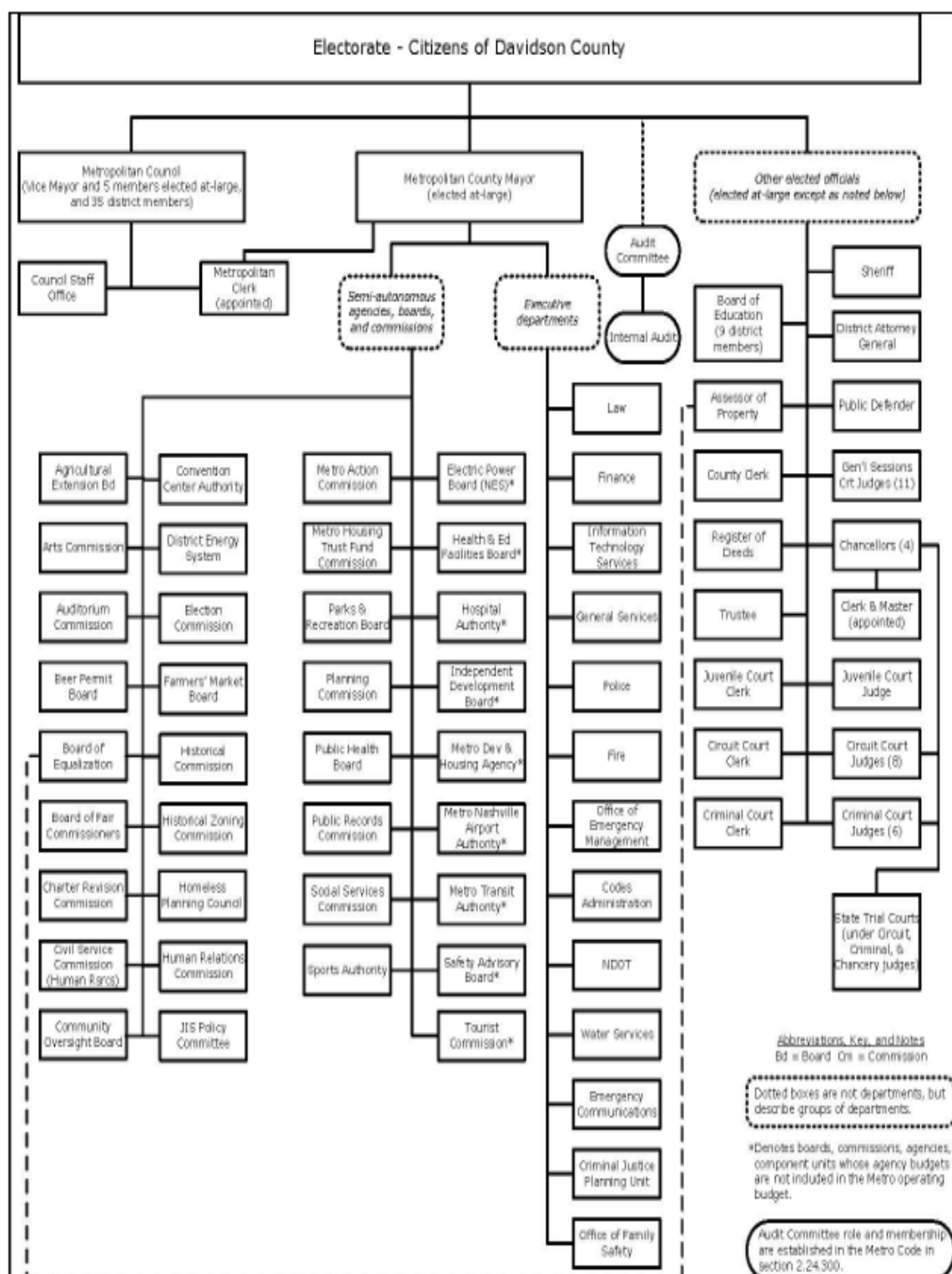
DEPARTMENT	TITLE VI COORDINATOR
Agricultural Extension	Katrice W. Jones Morgan
Arts Commission	Capri Harston
Assessor of Property	None Listed
Beer Board	Terrence Darby Sr.
Circuit Court Clerk	Andre Walton
Clerk and Master	None Currently
Codes Administration	Julie Welch
Community Review Board	Keturah Barnett
Convention Center Authority	Robert Rice
County Clerk	N/A
Criminal Court Clerk	Amy Rooker
Criminal Justice Planning Unit	Samantha Taylor
Department of Emergency Communications	Lynette S. Dawkins
Election Commission	Ricky Brown
Farmers' Market	David Griffin
Finance	Kimberly Northern
Fire	Jamie Summers
General Services	Brian Pate
General Sessions Court	Gina Fox
Health	Jose Cruz
Historical Commission	Dustin Summers
Human Relations Commission	Daniel Yoon
Human Resources	Razel Jones
Information Technology Services (ITS)	Leslie Ervin
Internal Audit	Bill Walker
Justice Integration Systems	Brandi Kyle
Juvenile Court	Jessica Robertson
Juvenile Court Clerk	Telisa Banniza
Metro Action Commission (MAC)	Elizabeth Exume
Metro Nashville Public Schools (MNPS)	Brittany Edmonson
Metropolitan Clerk	Austin Kyle
Metropolitan Development and Housing Agency (MDHA)	Jynnifer J. Walker
Municipal Auditorium	Taneisha Alexander
Nashville Department of Transportation	Charles Boddie
Office of Emergency Management	Drusilla Martin
Office of Family Safety	LaToya Townsend
Office of Homeless Services	Antonia Whitfield
Parks	Leigh Anne Lee
Planning Commission	Randi Semrick
Police	Seth Waltenbaugh
Public Defender	Sherlaine Emmons
Public Library	Susan Drye
Sheriff (DCSO)	Marsha Travis & Meshawn Cook
Social Services	Yuri L. Hancock
Sports Authority	Melisa Wells
State Fair Board	Kristi Harris
Trustee	Nicholas Garvin
Water Services	Juanita Davis
WeGo	Felix Castrodad



Metro Council

Public Roster

District	Last Name	First Name	Phone Number	Cell Number	Email
Vice Mayor	Henderson	Angie	615-880-3357	615-979-7943	angie.henderson@nashville.gov
At-Large 1	Suara	Zulfat	615-432-1341	615-585-2558	zulfat.suara@nashville.gov
At-Large 2	Porterfield	Delishia	615-432-1342	615-208-3068	delishia.porterfield@nashville.gov
At-Large 3	Evans Segall	Quin	615-432-1343		quin.evanssegall@nashville.gov
At-Large 4	Allen	Burkley	615-432-1344	615-383-6604	burkley.allen@nashville.gov
At-Large 5	Hill	Olivia	615-432-1345	615-456-3789	olivia.hill@nashville.gov
1	Kimbrough	Joy	615-432-1301	615-753-4797	joy.kimbrough@nashville.gov
2	Toombs	Kyonzté	615-432-1302	615-669-4390	kyonzte.toombs@nashville.gov
3	Gamble	Jennifer	615-432-1303	615-860-2602	jennifer.gamble@nashville.gov
4	Cortese	Mike	615-432-1304	615-200-7980	mike.cortese@nashville.gov
5	Parker	Sean	615-432-1305	615-339-6946	sean.parker@nashville.gov
6	Capp	Clay	615-432-1306	615-864-0008	clay.capp@nashville.gov
7	Benedict	Emily	615-432-1307	615 585-1258	emily.benedict@nashville.gov
8	Harrell	Deonté	615-432-1308	615-403-3564	deonte.harrell@nashville.gov
9	Hancock	Tonya	615-432-1309	615-398-1373	tonya.hancock@nashville.gov
10	Webb	Jennifer	615-432-1310	615-584-7244	jennifer.webb@nashville.gov
11	Eslick	Jeff	615-432-1311	615-300-4009	jeff.eslick@nashville.gov
12	Evans	Erin	615-432-1312	615-473-3076	erin.evans@nashville.gov
13	Bradford	Russ	615-432-1313	615-496-9983	russ.bradford@nashville.gov
14	Huffman	Jordan	615-432-1314	615-952-1519	jordan.huffman@nashville.gov
15	Gregg	Jeff	615-432-1315	615-579-6199	jeff.gregg@nashville.gov
16	Welsch	Ginny	615-432-1316	615-293-3365	ginny.welsch@nashville.gov
17	Vo	Terry	615-432-1317	615-854-8517	terry.vo@nashville.gov
18	Cash	Tom	615-432-1318	615-268-8748	tom.cash@nashville.gov
19	Kupin	Jacob	615-432-1319	615-200-7794	jacob.kupin@nashville.gov
20	Horton	Rollin	615-432-1320		rollin.horton@nashville.gov
21	Taylor	Brandon	615-432-1321	615-946-9700	brandon.taylor@nashville.gov
22	Weiner	Sheri	615-432-1322		sheri.weiner@nashville.gov
23	Druffel	Thom	615-432-1323	615-767-6458	thom.druffel@nashville.gov
24	Gadd	Brenda	615-432-1324	865-850-1109	brenda.gadd@nashville.gov
25	Preptit	Jeff	615-432-1325	615-942-0857	jeff.preptit@nashville.gov
26	Johnston	Courtney	615-432-1326	615-969-0901	courtney.johnston@nashville.gov
27	Nash	Bob	615-432-1327	615-337-7388	bob.nash@nashville.gov
28	Benton	David	615-432-1328		david.benton@nashville.gov
29	Ellis	Tasha	615-432-1329	615-578-2142	tasha.ellis@nashville.gov
30	Sepulveda	Sandra	615-432-1330		sandra.sepulveda@nashville.gov
31	Rutherford	John	615-432-1331	615-829-6004	john.rutherford@nashville.gov
32	Styles	Joy	615-432-1332	615-717-4017	joy.styles@nashville.gov
33	Lee	Antoinette	615-432-1333	615-669-8221	antoinette.lee@nashville.gov
34	Ewing	Sandy	615-432-1334		sandy.ewing@nashville.gov



Title VI Report, FY24-FY25

<i>GRANTOR</i>	<i>TITLE</i>	<i>AWARD</i>	<i>GRANT END DATE</i>
ARTS COMMISSION			
National Endowment for the Arts	Major Cultural Institution 24	\$101,300.00	6/15/2024
DISTRICT ATTORNEY			
U.S. DEPARTMENT OF JUSTICE	Hispanic, Child and Family VOCA Grant 24	\$504,408.00	6/30/2025
FINANCE DEPARTMENT			
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4476-DR-TN (3-3-2020) 20-24		3/2/2024
U.S. DEPARTMENT OF HOMELAND SECURITY	Public Assistance Grant FEMA-4601-DR-TN 21-25	\$3,454,218.76	3/24/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	Flood Public Assistance 10- 25	\$83,768,658.23	4/29/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4476-DR-TN (3-3-2020) 20-25	\$94,474.41	6/27/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4514-DR-TN 20-24	\$18,700,238.44	5/11/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	FEMA-4514-DR-TN 20-26	\$8,255,410.94	5/11/2026
U.S. DEPARTMENT OF TREASURY	American Rescue Plan Funding 21-24	\$259,810,600.00	12/31/2024
U.S. DEPARTMENT OF TREASURY	LOCAL ASSISTANCE AND TRIBAL CONSISTENCY F	\$100,000.00	12/31/2026
FIRE DEPARTMENT			
U.S. DEPARTMENT OF HOMELAND SECURITY	Assistance to Firefighters Grant 22 - 24	\$390,528.18	8/30/2024
GENERAL SERVICES			
U.S. DEPARTMENT OF ENERGY	Historic Courthouse Energy Retrofit to Reduce Energy	\$644,440.00	9/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Congressionally Directed Construction Proj	\$2,200,000.00	9/29/2026
GENERAL SESSIONS CT.			
U.S. DEPARTMENT OF JUSTICE	General Sessions DUI Court 21-25	\$352,425.00	9/30/2025
U.S. DEPARTMENT OF JUSTICE	Cherished HEARTS Court Expansion and Enhancment	\$930,095.00	9/30/2027

<i>GRANTOR</i>	<i>TITLE</i>	<i>AWARD</i>	<i>GRANT END DATE</i>
U.S. DEPARTMENT OF JUSTICE	BJA FY24 Adult Treatment Court Program 24-28	\$749,220.00	9/30/2028
HEALTH DEPARTMENT			
CDC Office of Financial Resources	TN Breast & Cervical Screening Program 25	\$333,100.00	6/30/2025
CENTER FOR DISEASE CONTROL & PREVENTION	Public Safety Partnerships in High Impact Areas 24-25	\$235,300.00	8/31/2024
CENTER FOR DISEASE CONTROL & PREVENTION	TB Control & Prevention 25	\$1,540,900.00	6/30/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	CDC Public Health Associate - Health In All Policies 22-	\$0.00	10/18/2024
CENTER FOR DISEASE CONTROL AND PREVENTION	NACCHO Implementing Overdose Prevention Strategie	\$50,000.00	11/30/2024
CENTER FOR DISEASE CONTROL AND PREVENTION	Community Health Workers for Public Health Response	\$3,000,000.00	8/30/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	Public Safety Partnerships in High Impact Areas 25	\$144,800.00	8/31/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Hlth Infrastructure Workforce	\$843,396.00	11/30/2025
CENTER FOR DISEASE CONTROL AND PREVENTION	Immunization Services 24-26	\$5,268,192.14	6/30/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Public Health Emergency Preparedness and Crisis Res	\$8,918,957.11	7/31/2026
CENTER FOR DISEASE CONTROL AND PREVENTION	Tobacco Use Prevention & Control 25-27	\$133,000.00	3/31/2027
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Health Infrastructure, Workfor	\$9,421,679.00	11/30/2027
CENTER FOR DISEASE CONTROL AND PREVENTION	Strengthening US Public Hlth Infrastructure, Workforce	\$1,230,754.00	11/30/2027
ENVIRONMENTAL PROTECTION AGENCY	Air Pollution Equipment 22-24	\$51,000.00	7/31/2024
ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 105 19-21	\$2,213,666.00	9/30/2024
ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 103 Inflation Reduction Act 23-26	\$64,825.00	5/31/2026
HEALTH RESOURCES & SERVICES ADMINISTRATION	Ryan White Part A HIV Emergency Relief 24-25	\$5,306,240.00	2/28/2025
HEALTH RESOURCES & SERVICES ADMINISTRATION	Nashville Strong Babies II - 24-29 Amend 1	\$1,008,333.00	3/31/2025
HEALTH RESOURCES & SERVICES ADMINISTRATION	Ryan White Part A HIV Emergency Relief 25-28	\$857,721.00	2/29/2028
Health Resources and Services Administration	Nashville Strong Babies II 26	\$497,200.00	3/31/2026
TN DEPARTMENT OF TENNCARE	School Based Oral Disease Prevention 25-26	\$1,840,200.00	6/30/2026
U.S. DEPARTMENT OF AGRICULTURE	Women, Infant and Children (WIC) 22-25 Amend 1	\$15,335,100.00	9/30/2024

<i>GRANTOR</i>	<i>TITLE</i>	<i>AWARD</i>	<i>GRANT END DATE</i>
U.S. DEPARTMENT OF AGRICULTURE	Revised Women, Infants & Children 25-28	\$16,430,700.00	9/30/2027
U.S. DEPARTMENT OF AGRICULTURE	Women, Infants & Children 25-28	\$16,430,700.00	9/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Tobacco Use Prevention & Control Services 20-23	\$308,500.00	3/31/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Health Access & Navigation in Tennessee (	\$2,041,200.00	6/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Immunization 21-26	\$6,473,474.00	6/30/2026
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Family Planning 23-27	\$5,685,500.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Prenatal Presumptive Eligibility Program 25-27	\$619,800.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Public Health Emergency Preparedness 22-27 (Formerl	\$4,118,973.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Sexually Transmitted Infection Prevention 23-26	\$2,071,373.00	12/31/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Health Promotion Services 25-29	\$904,900.00	6/30/2029
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Supporting Prevention of Adolescents Resources Knowl	\$500,000.00	6/30/2029
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Fetal Infant Mortality Review 26-30	\$1,593,000.00	6/30/2030
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE	Community Health Access & Navigation in Tennessee (	\$2,041,200.00	6/30/2026
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICE	TN Breast & Cervical Screening Program 26	\$333,100.00	6/30/2026
U.S. DEPARTMENT OF JUSTICE OJP	Comprehensive Opioid Abuse 20-23	\$1,040,371.00	9/30/2024
U.S. DEPARTMENT OF JUSTICE OJP	BJA OJP Community Based Violence Intervention & Pr	\$1,988,190.00	9/30/2026
U.S. ENVIRONMENTAL PROTECTION AGENCY	Air Pollution 103 20-22	\$656,614.00	3/31/2025
HISTORICAL COMMISSION			
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	FY2022 EDI Community Project Funding Grant: B-22-C	\$796,812.00	8/31/2030
U.S. DEPARTMENT OF INTERIOR	THC 2024 NAPC Conference 24	\$4,656.00	8/31/2024
U.S. DEPARTMENT OF INTERIOR	Club Baron National Register Nomination and Donelson	\$15,069.00	9/30/2025
U.S. DEPARTMENT OF INTERIOR	Davidson County Cemetery Preservation Plan (Phase II	\$40,000.00	9/30/2025
U.S. DEPARTMENT OF INTERIOR	Davidson County Cemetery Preservation Plan (Phase I	\$43,000.00	9/30/2025
U.S. DEPARTMENT OF INTERIOR	Nashville Mid-20th Century African American Districts H	\$57,963.00	9/30/2025

<i>GRANTOR</i>	<i>TITLE</i>	<i>AWARD</i>	<i>GRANT END DATE</i>
INFORMATION TECHNOLOGY SERVICES			
U.S. DEPARTMENT OF HOMELAND SECURITY	State and Local Cybersecurity Grant Program (SLCGP)	\$0.00	8/31/2026
U.S. DEPARTMENT OF TREASURY	Connected Community Facilities 24-26	\$1,978,484.36	6/30/2026
JUVENILE COURT			
BUREAU OF JUSTICE ASSISTANCE	Byrne State Crisis Intervention Program 25-27	\$450,000.00	6/30/2027
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Child Support Enforcement Title IV-D 23	\$4,254,608.04	6/30/2026
METRO ACTION			
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income Home Energy Assistance Program (LIHEA		8/31/2023
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Service Block Grant (CSBG) 21-23		9/30/2023
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income High Energy Assistance (LIHEAP) 22-10 2		9/30/2023
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Head Start/ Early Head Start 24		6/30/2024
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Service Block Grant (CSBG)22-24	\$1,321,684.70	9/30/2024
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income Home Energy Assistance Program (LIHEA	\$9,969,883.15	9/30/2024
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Head Start Early Head Start 20-25	\$15,135,455.00	6/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Community Service Block Grant (CSBG) 24-25	\$1,289,840.74	9/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	Low Income Home Energy Assistance Program (LIHEA	\$5,960,415.51	9/30/2025
U.S. DEPARTMENT OF LABOR	WIOA (Workforce Innovation & Opportunity Act) 21-22	\$2,403,333.00	6/30/2025
U.S. DEPARTMENT OF THE TREASURY	Emergency Rental Assistance Eviction Program (ERA-E	\$564,672.38	7/31/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Eviction Program (ERA	\$1,403,317.50	7/31/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Program (Part 2) 21-25	\$9,218,157.84	9/30/2025
U.S. DEPARTMENT OF TREASURY	Emergency Rental Assistance Program Part 2 21-25 Ad	\$13,827,236.76	9/30/2025
NDOT			
U.S. DEPARTMENT OF TRANSPORTATION	Federal COVID Relief Funds for Transportation Improve	\$840,980.00	9/30/2024
U.S. DEPARTMENT OF TRANSPORTATION	Strengthening Mobility and Revolutionizing Transportati	\$2,000,000.00	8/15/2025

<i>GRANTOR</i>	<i>TITLE</i>	<i>AWARD</i>	<i>GRANT END DATE</i>
U.S. DEPARTMENT OF TRANSPORTATION	Advanced Transportation and Congestion Management	\$1,500,000.00	6/30/2026
U.S. DEPARTMENT OF TRANSPORTATION	Congestion Mitigation Air Quality TDM (Phase 2) 23-25	\$1,415,595.00	9/30/2026
U.S. DEPARTMENT OF TRANSPORTATION	Congestion Mitigation and Air Quality Improvement Pro	\$3,655,000.00	7/1/2027
U.S. DEPARTMENT OF TRANSPORTATION	FY23 Transportation Alternatives Program 23-28	\$1,000,000.00	10/1/2028
OFFICE OF EMERG. MGMT.			
U.S. DEPARTMENT OF HOMELAND SECURITY	Emergency Management Performance Grant (EMPG) F	\$189,525.79	9/30/2024
U.S. DEPARTMENT OF HOMELAND SECURITY	Port Security Program 21-24	\$337,350.00	2/28/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	2022 Homeland Security 22-25	\$352,431.00	4/30/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	EMERGENCY MANAGEMENT PERFORMANCE GRA	\$180,049.50	9/30/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	PUBLIC ASSISTANCE GRANT FEMA-4637-DR-TN 21-	\$810,927.90	12/9/2025
U.S. DEPARTMENT OF HOMELAND SECURITY	2023 Homeland Security 23-26	\$288,441.00	4/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	FY23 Urban Area Security Initiative 23-26	\$740,450.00	4/30/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	PUBLIC ASSISTANCE FEMA-4691- DR-TN 22-26	\$1,457,291.94	12/21/2026
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Homeland Security 24-27	\$43,470.99	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Homeland Security 24-27 (Letter of Acceptance)	\$43,470.99	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Urban Area Security Initiative 24-27	\$591,642.71	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	2024 Urban Area Security Initiative 24-27	\$591,642.71	4/30/2027
U.S. DEPARTMENT OF HOMELAND SECURITY	FY24 Port Security Grant Program (PSGP) 25-28	\$300,000.00	8/31/2027
U.S. DEPARTMENT OF TRANSPORTATION	Hazardous Materials Emergency Preparedness 22-25	\$150,160.00	8/31/2025
OFFICE OF FAMILY SAFETY			
U.S. DEPARTMENT OF JUSTICE	Office of Family Safety STOP , Family Justice Center 2	\$144,886.00	2/28/2025
U.S. DEPARTMENT OF JUSTICE	VOCA Family Justice Center 24	\$541,625.00	2/28/2025
U.S. DEPARTMENT OF JUSTICE	OCJP FY25 Family Justice Center Initiative 24-25	\$118,000.00	6/30/2025
U.S. DEPARTMENT OF JUSTICE	FY25 Office of Family Safety STOP , Family Justice Ce	\$155,114.00	6/30/2026

OFFICE OF HOMELESS SERVICES

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	MDHA Community Development Block Grant 24	\$250,000.00	12/31/2024
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	Continuum of Care Transfer of Funds from MDHA 24-2	\$381,251.00	6/30/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	HUD Coordinated Entry Renewal 24-25	\$128,000.00	9/30/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	HUD HMIS Renewal 24-25	\$141,508.00	10/31/2025
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPM	Community Development Block Grant 23-27	\$250,000.00	5/31/2027

POLICE DEPARTMENT

U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant 21-24	\$530,779.00	9/30/2024
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 22-25	\$546,989.00	9/30/2025
U.S. DEPARTMENT OF JUSTICE	2024 VOCA - Law Enforcement Victim Coordinator 24	\$1,423,365.00	6/30/2026
U.S. DEPARTMENT OF JUSTICE	2024 DNA Capacity Enhancement Backlog Reduction (	\$243,744.00	9/30/2026
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 24-26	\$594,876.00	9/30/2026
U.S. DEPARTMENT OF JUSTICE	Justice Assistance Grant (JAG) 25-27	\$494,241.00	9/30/2027
U.S. DEPARTMENT OF TRANSPORTATION	2024 Tennessee Highway Safety Office DUI 23-24	\$50,000.00	9/30/2024
U.S. DEPARTMENT OF TRANSPORTATION	2025 Tennessee Highway Safety Office DUI 24-25	\$710,000.00	9/30/2025
U.S. OFFICE OF NATIONAL DRUG CONTROL POLICY	2024 High Intensity Drug Trafficking Area (HIDTA) Prog	\$57,000.00	12/31/2024
U.S. OFFICE OF NATIONAL DRUG CONTROL POLICY	2025 High Intensity Drug Trafficking Area (HIDTA) 25	\$76,000.00	12/31/2025

PUBLIC LIBRARY

INSTITUTE OF MUSEUM AND LIBRARY SERVICES	Library Services 25	\$430,500.00	6/30/2025
U.S. DEPARTMENT OF TREASURY	Digital Skills, Education, and Workforce Development G	\$117,938.00	10/31/2026

SHERIFF

U.S. DEPARTMENT OF JUSTICE	Addressing SUD Strengthening Families and Communit	\$1,126,988.00	9/30/2024
U.S. DEPARTMENT OF JUSTICE	BJA COSSUP 24-26	\$1,526,248.00	9/30/2026

SOCIAL SERVICES

Monday, July 14, 2025

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	GNRC Nutrition & Transport Services 25 Contract 2025	\$102,500.00	6/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	GNRC Nutrition and Transportation Program 24	\$911,686.00	6/30/2025
U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES	GNRC Nutrition and Transportation Program 25	\$981,246.00	6/30/2025

STATE TRIAL COURTS

U.S. DEPARTMENT OF TRANSPORTATION	Tennessee Highway Safety Office Recovery Court Enh	\$60,000.00	9/30/2024
U.S. DEPARTMENT OF TRANSPORTATION	Tennessee Highway Safety Office Recovery Court Enh	\$60,000.00	9/30/2025

WATER & SEWER

ENVIRONMENTAL PROTECTION AGENCY	Metro Nashville Police Department Impound Lot Storm	\$500,000.00	9/30/2025
ENVIRONMENTAL PROTECTION AGENCY	Lead Service Line Inventory 24-26	\$100,000.00	12/31/2025
U.S. DEPARTMENT OF AGRICULTURE FOREST SERVIC	Tree Canopy Restoration for Natural Resources Enhanc	\$539,000.00	9/30/2026
U.S. DEPARTMENT OF TREASURY	DWR-ARP Non Collaborative State Water Infrastructure	\$63,418,244.83	9/30/2026

Appendix E – Minority and Women Business FY 25 by Department

Fiscal Year 2025 Disadvantaged Business Report

FY25 (July 1, 2024 - June 30, 2025)

		Disadvantaged Business														Totals		
		Ethnic Minority Male Only					Woman Owned									Total Disadvantaged Business	Non-Ethnic Male	Total of All Business
		African American	Hispanic	Asian	Native American	Non-Specific Male Minority	Total Minority Owned	African American	Hispanic	Asian	Native American	Non-Specific Female Minority	Non-Ethnic Female	Total Woman Owned	OS&E*			
	1	Agricultural Extension	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
	2	Arts Commission	52,245	0	0	0	\$194,310	142,065	0	0	0	0	76,790	\$76,790	0	\$271,100	0	\$271,100
	3	Assessor of Property	54,000	0	0	0	\$54,000	0	0	0	0	0	33,595	\$33,595	0	\$87,595	0	\$87,595
	4	Beer Board	0	0	0	0	\$0	0	0	0	0	0	80,000	\$80,000	0	\$80,000	0	\$80,000
	5	Board of Fair Commissioners	327,395	0	176,962	0	\$504,357	0	0	0	0	0	1,321,697	\$1,321,697	0	\$1,826,054	0	\$1,826,054
	6	Circuit Court Clerk	0	0	0	0	\$0	0	0	0	0	0	503	\$503	0	\$503	0	\$503
	7	Clerk and Master - Chancery	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
	8	Codes Administration	145,770	11,205	0	0	\$156,975	0	0	0	0	0	371,393	\$371,393	0	\$528,367	0	\$528,367
	9	Community Oversight Board	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
	10	Community Review Board	0	0	0	0	\$5,000	5,000	0	0	0	0	107,982	\$107,982	0	\$112,982	0	\$112,982
	11	Convention Center Authority	99,276	0	0	0	\$302,607	203,331	0	0	0	0	4,420,147	\$4,420,147	0	\$4,722,754	0	\$4,722,754
	12	County Clerk	0	0	0	0	\$331,547	5,250	0	326,297	0	0	10,552	\$10,552	0	\$342,098	0	\$342,098
	13	Criminal Court Clerk	0	0	0	0	\$0	0	0	0	0	0	11,196	\$11,196	0	\$11,196	0	\$11,196
	14	Criminal Justice Planning	0	0	0	0	\$766	0	0	766	0	0	0	\$0	0	\$766	0	\$766
	15	Debt Service	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
	16	District Attorney	0	0	0	0	\$0	0	0	0	0	0	25	\$25	0	\$25	0	\$25
	17	District Energy System	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
	18	Election Commission	0	0	0	0	\$0	0	0	0	0	0	12,191	\$12,191	0	\$12,191	0	\$12,191
	19	Emergency Communications	0	0	0	0	\$101,667	0	0	101,667	0	0	253,943	\$253,943	0	\$355,609	0	\$355,609

Appendix E – Minority and Women Business FY 25 by Department

20	Employee Benefit Board	0	0	0	0	0	\$0	0	0	0	0	0	118,445	\$118,445	0	\$118,445	0	\$118,445
21	Farmer's Market	1,200,674	0	2,696	0	0	\$1,206,370	3,000	0	0	0	0	39,747	\$39,747	0	\$1,246,117	0	\$1,246,117
22	Finance	92,544	0	0	0	0	\$4,531,497	0	0	4,438,953	0	0	285,998	\$285,998	0	\$4,817,495	0	\$4,817,495
23	Fire	44,256	0	0	0	0	\$5,416,789	0	5,364,993	7,540	0	0	1,856,405	\$1,856,405	0	\$7,273,194	0	\$7,273,194
24	General Hospital	0	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
25	General Services	19,675,945	0	0	0	0	\$26,162,474	3,950,704	2,535,668	158	0	0	13,916,085	\$13,916,085	0	\$40,078,559	0	\$40,078,559
26	General Sessions Court	0	0	0	0	0	\$12,385	12,385	0	0	0	0	21,584	\$21,584	0	\$33,969	0	\$33,969
27	Health	4,882,522	0	1,432,444	0	0	\$6,399,141	80,275	0	3,900	0	0	7,204,858	\$7,204,858	0	\$13,603,999	0	\$13,603,999
28	Historical Commission	21,305	0	0	0	0	\$21,305	0	0	0	0	0	82,202	\$82,202	0	\$103,507	0	\$103,507
29	Human Relations Commission	750	0	0	0	0	\$54,585	53,835	0	0	0	0	15,000	\$15,000	0	\$69,585	0	\$69,585
30	Human Resources	0	0	0	0	0	\$0	0	0	0	0	0	9,421	\$9,421	0	\$9,421	0	\$9,421
31	Industrial Development Board	0	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
32	Information Technology Services	0	0	809,683	0	0	\$1,895,631	0	0	1,085,948	0	0	4,602,331	\$4,602,331	0	\$6,497,962	0	\$6,497,962
33	Internal Audit	0	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
34	Justice Integration Systems	0	0	0	0	0	\$0	0	0	0	0	0	4,452	\$4,452	0	\$4,452	0	\$4,452
35	Juvenile Court	2,742	0	0	0	0	\$2,817	75	0	0	0	0	12,298	\$12,298	0	\$15,115	0	\$15,115
36	Juvenile Court Clerk	0	0	0	0	0	\$0	0	0	0	0	0	0	\$0	0	\$0	0	\$0
37	Law	57,060	0	0	0	0	\$95,348	38,288	0	0	0	0	109,647	\$109,647	0	\$204,994	0	\$204,994
38	Mayor's Office	0	0	0	0	0	\$0	0	0	0	0	0	53040	\$53,040	0	\$53,040	0	\$53,040
39	Metro Action Commission	317,289	0	0	67,170	0	\$1,631,327	1,246,869	0	0	0	0	1,991,167	\$1,991,167	0	\$3,622,495	0	\$3,622,495
40	Metropolitan Clerk	0	0	0	0	0	\$0	0	0	0	0	0	691	\$691	0	\$691	0	\$691
41	Metropolitan Council	489	0	0	0	0	\$489	0	0	0	0	0	2510.58	\$2,511	0	\$3,000	0	\$3,000
42	Municipal Auditorium	330,391	0	0	0	0	\$980,294	36,921	612,981	0	0	0	1,137,115	\$1,137,115	0	\$2,117,408	0	\$2,117,408
43	Office of Emergency Management	0	0	0	0	0	\$0	0	0	0	0	0	66772	\$66,772	0	\$66,772	0	\$66,772

Appendix E – Minority and Women Business FY 25 by Department

44	Office of Family Safety	0	0	50	0	0	\$11,641	5320	0	6,271	0	0	2933.43	\$2,933	0	\$14,575	0	\$14,575
45	Office of Homeless Services	410658.7	0	0	0	0	\$422,544	11885.35	0	0	0	0	1969	\$1,969	0	\$424,513	0	\$424,513
46	Parks and Recreation	2,262,914	0	0	0	0	\$4,420,036	1,874,619	282,103	400	0	0	37,098,131	\$37,098,131	0	\$41,518,167	0	\$41,518,167
47	Planning Commission	0	0	0	0	0	\$0	0	0	0	0	0	121,949	\$121,949	0	\$121,949	0	\$121,949
48	Police	621,401	9,034	0	0	0	\$1,019,548	37,109	0	352,005	0	0	19,746,832	\$19,746,832	0	\$20,766,380	0	\$20,766,380
49	Public Defender	0	0	0	0	0	\$138,102	138,102	0	0	0	0	35,518	\$35,518	0	\$173,619	0	\$173,619
50	Public Library	273,464	4620	41,137	0	0	\$2,378,424	1,125,584	933,618	0	0	0	6,210,527	\$6,210,527	0	\$8,588,951	0	\$8,588,951
51	Register of Deeds	0	0	0	0	0	\$0	0	0	0	0	0	1,286	\$1,286	0	\$1,286	0	\$1,286
52	Sheriff	369,625	0	0	0	0	\$369,625	0	0	0	0	0	4,002,315	\$4,002,315	0	\$4,371,940	0	\$4,371,940
53	Social Services	0	0	0	0	0	\$500	500	0	0	0	0	45,138	\$45,138	0	\$45,638	0	\$45,638
54	Sports Authority	0	0	0	0	0	\$172,929	172,929	0	0	0	0	0	\$0	0	\$172,929	0	\$172,929
55	State Trial Courts	0	0	0	0	0	\$0	0	0	0	0	0	1,204	\$1,204	0	\$1,204	0	\$1,204
56	Transportation (NDOT)	1,326,280	113,495	949,547	0	0	\$9,594,471	4,029,749	51,522	0	3,123,877	0	8,687,107	\$8,687,107	0	\$18,281,578	0	\$18,281,578
57	Trustee	0	0	0	0	0	\$7,490	7,490	0	0	0	0	316,109	\$316,109	0	\$323,599	0	\$323,599
58	Waste Services	404,085		11,146				9,690	77,841				3,169,934					
59	Water Services	9,678,426	0	0	0	0	\$11,590,830	1,352,966	156,212	403,226	0	0	21,687,186	\$21,687,186	0	\$33,278,016	0	\$33,278,016
	Totals	\$42,651,506	\$138,353	\$3,423,666	\$67,170	\$0	\$80,187,819	\$14,543,940	\$10,014,938	\$6,727,130	\$3,123,877	\$0	\$139,357,920	\$136,187,986	\$0	\$216,375,804	\$0	\$216,375,804

**OS&E (Other Socially and Economically disadvantaged Business) includes disabled and veteran owned businesses.