

THE
UNIVERSITY
OF RHODE ISLAND

Language Access Guidelines



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GUIDELINES FOR LANGUAGE ACCESS PLANNING AND OPERATIONALIZATION

Purpose of the Language Access Plan

The University of Rhode Island Language Access Plan (also, “LAP”) is designed to promote meaningful access and equal opportunity in service delivery for persons with Limited English Proficiency (LEP) and persons with Hearing/Speech Impairment (also, “HIS”) participating in or receiving services offered by the University of Rhode Island (also, “University”). This document provides a comprehensive manual to promote meaningful language access and a shared understanding of how the University, as part of the U.S. Land Grant System, operationalizes its organizational responsibilities and commitment to serving linguistically diverse persons.

The focus of the LAP relates to programs, activities, and services offered by the University, but does not interfere with admissions eligibility standards for which English proficiency is required. The LEP focus of the Policy on Language Access and the Language Access Plan applies to qualified participants who may come into contact with university programs, activities, and services.

The Policy on Language Access does not affect classroom instruction. With the exception of foreign language courses, University courses are and will continue to be taught in English. The Policy on Language Access does not alter the essential functions of employment positions at the University where English proficiency may be an essential function.

FOUR (4) FACTOR ANALYSIS: IDENTIFICATION OF COMMUNITIES WITH LEP

The Four (4) Factor Analysis¹ provides the University a framework by which it may look at all the programs and services the University provides to persons with LEP to ensure meaningful access, while not imposing undue burdens on service recipients or the University. Thus, providing a method for implementation and periodic assessment of the Language Access Program.

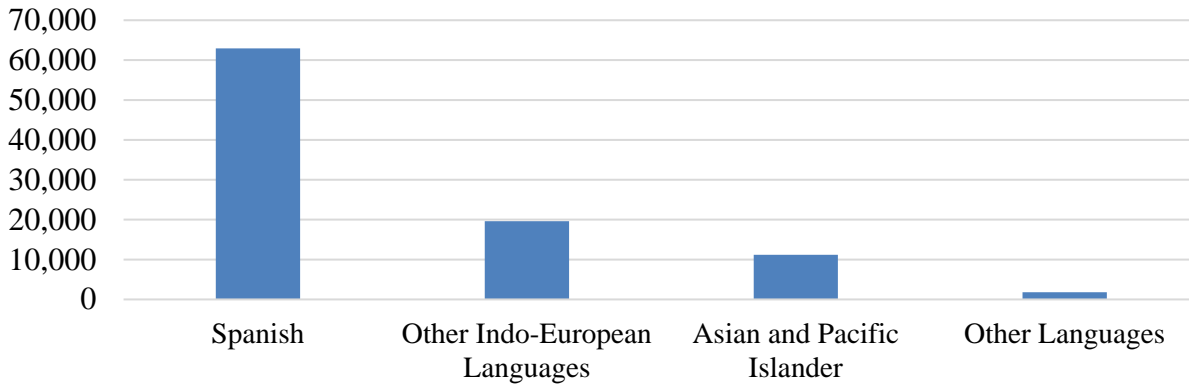
Factor I: The number or proportion of LEP persons eligible or likely to be encountered.

Per the U.S. Census Bureau, Selected Social Characteristics in the United States, 2022 American Community Survey, 1-Year Estimates Data Profile, Rhode Island has a population of 1,041,779 five (5) years and older, of which 95,523 (9.20%) reported speaking English “less than very well.” Individuals who speak English “less than very well” are considered persons with Limited English Proficiency.

Of those with Limited English Proficiency, 62,927 (6%) speak Spanish; 19,614 (1.9%) speak other Indo-European languages; 11,177 (1.1%) speak Asian and Pacific Islander languages; 1,805 (0.2%) speak Other languages.

¹ Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with LEP; Policy Guidance, 65 FR 50123.

The United States Census Bureau, Selected Social Characteristics in the United States, 2022
American Community Survey, 1-Year Estimates Data Profile



*Table I Source: U.S. Census Bureau, Social Characteristics in the United States, 2022 American Community Survey, 1-Year Estimates Data Profile, Table ID DP02

The most spoken non-English languages in Rhode Island by persons with LEP, ages five (5) years and older, have been reported on the chart below:

Non-English-Speaking Languages	Estimated LEP Population	% Total LEP	% Total State Population
Spanish	62,927	65.88%	6.04%
Indo-European languages	15,796	16.54%	1.52%
Other Asian and Pacific Island languages	5,937	6.22%	0.57%
Chinese (incl. Mandarin, Cantonese)	3,074	3.22%	0.30%
French, Haitian, or Cajun	2,505	2.62%	0.24%
Korean:	1,122	1.17%	0.11%
Russian, Polish, or other Slavic languages	990	1.04%	0.10%
German or other West Germanic languages	323	0.34%	0.03%
Other and unspecified languages	826	0.86%	0.08%
Arabic	979	1.02%	0.09%
Tagalog (incl. Filipino)	740	0.77%	0.07%
Vietnamese	304	0.32%	0.03%
Total LEP Population	95,523		
Total State Population	1,041,779		

*Table II Source: U.S. Census Bureau, Languages Spoken at Home for the Populations 5 Years and Over, American Community Survey, 1-Year Estimates, Table ID C16001

Factor II: The frequency with which LEP persons come in contact with University of Rhode Island programs or activities.

Persons with LEP come into contact with University of Rhode Island programs or activities infrequently. Even though future involvement is unpredictable, the U.S. Census Bureau, 2022 American Community Survey, 1-Year Estimates Data Profile, shows that 812,960 (78.00%) of the Rhode Island population only speak English, while 228,819 (22.00%) speak a language other than English, and 62,927 (9.20%) of the population speaks English less than very well. Those who speak English less than very well will require language assistive services.

Factor III: The nature and importance of the program, activity, or service.

Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. University employees and affiliates are required to provide free language assistance services to otherwise qualified persons with LEP upon request and must inform the public about available language assistance services.

Factor IV: The resources available to the University and costs.

University employees and affiliates have access to cost-effective means of delivering competent and accurate language services. Examples of cost-effective resources include:

- “I Speak” Cards
- Outreach and notification of language assistive materials and services
- Formalized use of qualified interpreter staff persons and volunteers
- External vendors

MEETING THE REQUIREMENTS

Outreach and Notification of Language Assistive Services

The University is committed to taking reasonable steps to promote timely and meaningful access for individuals encountered through programs or activities free of charge. When advertising University sponsored programs or activities, the following sample outreach statement may be included in promotional materials to notify the public of language assistive services:

The University of Rhode Island encourages all people to participate in its programs and activities. If you anticipate needing an accommodation or have questions about accessibility, please contact [insert first and last name] at [insert telephone number or other contact information here such as an email address]. For TTY assistance, contact R.I. Relay Services at 711.

If you speak a language other than English as your primary language and require interpretation or translation services, or if you need a reasonable accommodation, contact

[insert first and last name] at [insert telephone number or other contact information here such as an email address]. For TTY assistance, contact R.I. Relay Services at 711.

Contact should be made at least five business days in advance of the date of required services. While it is not always possible to accommodate requests made after this deadline, reasonable efforts will be made to accommodate each person. If you believe you have been denied access to language assistive services and wish to file a discrimination complaint, contact equalopportunity-group@uri.edu.

Language Assistive Measures

Interpretation and translation services and reasonable accommodations will be offered to qualified individuals upon request. The timing and nature of the request may affect the University's ability to fulfill requests. For this reason, qualified individuals who may require interpretation, translation, or reasonable accommodations are encouraged to make contact as early as possible in advance.

Employees and affiliates responding to written communication from persons with LEP:

If appropriate, staff may use the Microsoft Word Translate function, or Google Translate, or may transfer the request to the designated in-house staff or volunteer responsible for providing translation services. Translation is defined as "The communication of the meaning of a source-language text using an equivalent target-language text."

Employees and affiliates responding to in-person requests from LEP persons:

1. At the point of contact with a person with LEP, University employees and affiliates must determine whether the individual is an LEP person, and what their primary language is.
2. When identifying the language needs of the person with LEP, if necessary, staff may use "I Speak" language identification cards as the primary method to identify the language spoken by the person with LEP (*Appendix A*). "I Speak Cards" provide a practical way to identify which language an individual speaks by allowing persons with LEP to identify their primary language in their native language and English. For example, an "I Speak Card" may say, "I Speak Portuguese" in Portuguese and English.
3. After a need for interpretation services is established, employees and affiliates may provide interpretation assistance by qualified interpreters including employees, volunteers, shared state resources, contacted vendors, or telephonic interpretation services.

Translation of Written Materials (Vital documents):

Documents that affect access to, retention in, or termination or exclusion from University programs, services, or activities are considered "vital documents." Examples include but are not limited to:

Applications; consent forms; complaint forms; intake forms; letters or notices pertaining to eligibility for benefits; letters or notices pertaining to rights, denial or termination of services or benefits or that require a response from the person with LEP; written tests that

test competency for a particular license, job, or skill for which knowing English is not required; documents that must be provided by law; and notices regarding the availability of free language assistance services for persons with LEP.

All vital and written materials will be identified for translation and promptly translated upon receiving a request from a person with LEP. Unanticipated or individualized documents will be individually translated or at a minimum sight translated at the point of contact. When possible, University employees and affiliates will translate vital documents into the most common spoken languages identified in Table II.

Responding to oral requests for interpretation:

When coming into contact with persons with LEP on the phone, after identifying the primary language spoken by the person with LEP, staff may transfer the request to the designated in-house staff or volunteer interpreter. Divisions with a high likelihood of encountering persons with LEP may maintain a current list showing the name, language, phone number, and hours of bilingual employees, affiliates, and volunteers.

If a bilingual employee, affiliate, or volunteer, is not available and does not speak the needed language, an outside qualified interpreter must be hired to assist the service recipient. Approved vendors providing translation or interpretation services are available on the state's Master Price Agreement No. 54: Interpreting and Translation Services (*Appendix B*). AT&T USADirect is also available as a resource (*Appendix C*).

Responding to requests from individuals with Hearing/Speech Impairment (HSI):

Individuals with Hearing/Speech Impairment, who have had a loss of hearing, may require American Sign Language Interpretation, or a CART (Communication Access Realtime Translation) Service provider, to access University programs or activities.

- CART Service provides instantaneous translation of what is being said into a visual print display so that it can be read (instead of heard). CART Service is one means of communication access for d/Deaf or hard-of-hearing individuals who read English fluently.
- An "interpreter" translates one language into another, like English into American Sign Language. CART Providers convert spoken English into a printed English format. The CART Provider does not "interpret" from one language to another but is more similar to a Transliterators who changes spoken English communication into a visually enhanced English-based format or Signed English transliteration. CART providers, ASL Interpreters, Signed English Transliterations, and Oral Transliterations all provide communication access services, each through its own mode, for particular deaf, hard of hearing, and late-deafened people. *Source: Massachusetts Commission for the Deaf and Hard of Hearing.*

Sign language interpreters or CART Service providers can be booked by contacting the Rhode Island Commission on the Deaf and Hard of Hearing. While the Rhode Island Commission on the Deaf and Hard of Hearing accepts telephone bookings, the Office of Equal Opportunity encourages the completion of the “Sign Language Interpreter and Captioning Request Form,” to allow you to maintain a record of the booking request.

1. Complete the Rhode Island Commission on the Deaf and Hard of Hearing “Sign Language Interpreter and Captioning Request Form,” found in Appendix D.
2. Before submitting the form to the Rhode Island Commission on the Deaf and Hard of Hearing, review the State of Rhode Island Master Price Agreement No. 358 (Appendix E), and create a Purchase Order with the University of Rhode Island Purchasing Department. The hourly rate of American Sign Language Interpreters ranges from \$52.00 to \$75.00. Interpreters and CART Service providers must be paid for a 2-hour minimum.
3. Once a Purchase Order has been issued, and the Sign Language Interpreter and Captioning Request Form has been submitted, the Rhode Island Commission on the Deaf and Hard of Hearing will schedule the ASL interpreter or CART Service provider.
4. The Rhode Island Commission on the Deaf and Hard of Hearing will not issue an invoice for services rendered. The ASL Interpreter or CART Service provider will issue the invoice.

Resource: While the use of in-person interpretation is preferred, Video Remote Interpreting (VRI) is available as a last resort. VRI relies on video-conferencing technology to provide ASL interpretation. ASL interpreters booked via VRI have not been vetted. For this reason, VRI is only encouraged if an ASL Interpreter cannot be scheduled by engaging the Rhode Island Commission on the Deaf and Hard of Hearing. If using VRI, the Quality Control resource found in Appendix G should be used to ensure interpretation standards are met.

Quality Control

The University will continuously review the quality of language assistive services following guidance from the U.S. Department of Justice Civil Rights Division. A sample assessment may be found in Appendix F: Language Assistive Services Quality Assurance Practices.

Training and Communications Plan

Dorca P. Smalley, the Language Access Coordinator, will offer training on the procedures for requesting translation and interpretation services, along with resources to promote compliance with Title VI. The training will also cover the reasonable accommodation process and compliance with the ADA and Section 504. Self-paced training is available on Brightspace and can be accessed through the University of Rhode Island Office of Equal Opportunity Language Access tab at <https://web.uri.edu/equal-opportunity/language-access/>.

The Policy on Language Access will be disseminated in the new employee orientation to notify new hires of the policy. University sites will have copies of the policy. Copies of the policy will be published online on the University's website (<https://web.uri.edu/policies/>) and shall be made available to the public upon request. Individuals seeking an accommodation to access the policy may contact:

Dorca P. Smalley, Language Access Coordinator
Director, Office of Equal Opportunity
University of Rhode Island
75 Lower College Road
Kingston, Rhode Island 02881
Dorca_paulino@uri.edu
Phone: 401-874-4929
For TTY assistance, contact Rhode Island Relay Services at 711.

RESOURCES

Appendix A: I Speak Cards ([Link](#))

Appendix B: Master Price Agreement 54 -Interpreting and Translation Services ([Link](#))

Appendix C: AT&T USADirect ([Link](#))

Appendix D: Rhode Island Commission on the Deaf and Hard of Hearing -Sign Language Interpreter and Captioning Request Form ([Link](#))

Appendix E: Master Price Agreement 358 -Sign Language and CART Services ([Link](#))

Appendix F: Language Assistive Services Quality Assurance Practices ([Link](#))

Self-paced language access training and the support materials listed above can be accessed by visiting the [University of Rhode Island Office of Equal Opportunity Language Access](#) website.