OT21-2103 COVID-19
HEALTH EQUITY TA:

Language Access and Accessibility Guide

National Network
of Public Health Institutes

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OVERVIEW

The National Network of Public Health Institutes (NNPHI) and subcontracted Public Health Institutes collaborate with the OT21-2103 grant recipients and their partners to provide technical assistance for the National Initiative to Address COVID-19 Health Disparities Among Populations at High-Risk and Underserved, Including Racial and Ethnic Minority Populations and Rural Communities.

OT21-2103 represents CDC's largest investment to date, focusing specifically on reducing health disparities related to COVID-19. Reducing health disparities requires using a health equity lens as a method of practice. More specifically, using a health equity lens while carrying out the work of this national initiative includes institutionalizing accessibility into all the technical assistance provided. Accessibility, according to the National Center on Deaf-Blindness (2022), necessitates that our technical assistance audience is able to "perceive, understand, navigate, and interact with electronic information and be active, contributing members of the digital world."

Applying a health equity lens includes recognizing the moral imperative and legal obligation under the ADA and Title VI of the Civil Rights Act of 1964 to provide communications inclusive of those with communication disabilities and those who do not use or prefer not to use English as a primary language. To meet the needs of the racial and ethnic minority populations and rural communities, and those with communication disabilities, the technical assistance provided should reflect the diversity in languages spoken and signed.

Compiled by NNPHI, this Accessibility and Equity Guide contains resources and best practices for inclusive communication. **Section I: Accessibility and Equity through Effective Communication** provides an overview of common aids and services used by those with Communication Disabilities, including sections on American Sign Language (ASL) Interpreters, Communication Access Realtime Translation (CART), and Accessible Electronic Documents. **Section II: Accessibility and Equity through Own-Language Use** will provide an overview of aids and services for Own-Language Communication, including Verbal Translation, Written Translation, Telephone Interpreting Services (TIS), Choosing a Vendor, and Email Communication Best Practices for U.S Island Territories. **Section III: Budgeting for Accessibility and Equity** reviews best practices for procurement and contracting to facilitate inclusive community economic growth. Though there are three sections in this document, the three are not mutually exclusive and have many overlaps.

We are asking TA partners to expand the outline with regional resources so that this document can be a living document that grows as we partner in this work. Please send any resources to covid19healthequity@nnphi.org.

SECTION I:

Accessibility and Equity through Effective Communication

ACCESSIBILITY AND EQUITY FOR COMMUNICATION DISABILITIES

Accessibility and equity in the United States have been written into policy as the American Disabilities Act (ADA) Standards for Accessible Design compliance, which provides civil rights protections to individuals with disabilities like those provided to individuals based on race, color, sex, national origin, age, and religion.

The ADA uses policies such as Title II (state and local government services) and Title III (public accommodations and commercial facilities) of the ADA to ensure that public organizations are inclusive by providing electronic information, services, and facilities that are accessible to those with disabilities. Furthermore, Title VI of the Civil Rights Act compliance calls for programs that receive federal funding to provide services that do not discriminate based on race, color, or national origin and inclusively offer services, including translation into the language of choice.

The National Network of Public Health Institutes (NNPHI) and subcontracted Public Health Institutes serve as a resource to assist grant recipients with OT21-2103 ADA, Title VI, and 508 compliances. The following resources detail how to assist grant recipients with OT21-2103 ADA compliance and make requests and budget for accessibility depending on the accessibility topic.

EFFECTIVE COMMUNICATION

Under Section 504 of the Rehabilitation Act (Section 504), the ADA, and Section 1557 of the Affordable Care Act (ACA), state and local governmental and non-profit entities receiving federal funding "...must take appropriate steps to ensure effective communications with all applicants, participants, and members of the public in their programs and activities" (HRSA, 2020). The ADA specifically requires such entities to communicate effectively with people with communication disabilities. State and local governmental and non-profit entities receiving federal funding must attempt to ensure that persons with vision, hearing, or speech disabilities can communicate with, receive, and convey information from the covered entity in a fitting way.

People with vision, hearing, or speech disabilities use a variety of ways to communicate.

For instance, people who are blind may give and receive information audibly, and people who are deaf may give and receive information through writing or sign language. When choosing an aid or service, it is best practice to give primary consideration to the aid or service requested by the person with a communication disability. Additionally, the cost of services and aids should be covered by the Title II or Title III entity.

AMERICAN SIGN LANGUAGE

Sign Language is a visual language; each country has its own sign language, and regions have unique dialects, just as in spoken languages. It is a common misconception that sign language is the same everywhere. American Sign Language is used mainly in the United States and parts of Canada, but there are approximately 300 sign languages globally. When arranging needed accommodations, confirm what sign language will support effective communication with the individual and secure sign language interpreters who are well-trained in that respective language.
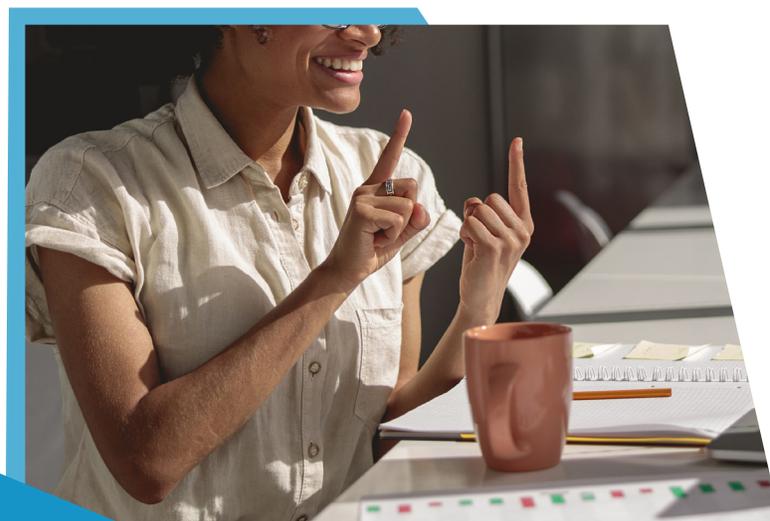
To communicate effectively with someone who is deaf or hard of hearing, a sign language interpreter may be needed. Interpreters must be able to accurately convey the meaning from one language into another in a culturally appropriate manner, mindful of the setting in which the information will be provided. Signed language interpreters support effective communication among individuals using different languages that may be signed or vocalized. Deaf Interpreters are individuals who are Deaf or hard of hearing and possess native or near-native fluency in American Sign Language, as well as extensive knowledge and understanding of deafness, the Deaf community, and/or Deaf culture. They may be used as a part of an interpreting team that includes hearing sign language interpreters to support effective communications with members of the Deaf community, public health professionals, and others.

RESOURCES FOR FINDING AN ASL INTERPRETER

The National Registry of Interpreters for the Deaf (RID) hosts an online database of RID Certified Interpreters and approved agencies. As the hiring entity, you have the option to hire individuals directly, through an interpreter service agency, or **call 703.838.0030 (voice) or 703.838.0459 (teletypewriter)**.

Other options include seeking referrals from your state office for the Deaf and Hard of Hearing, the local chapter of the National Association of the Deaf, or the person requesting the interpreter. Start looking for an interpreter as soon as the need arises, as it may be difficult to find a qualified interpreter on short notice.

Budgeting for an ASL Interpreter - The # of clients, # of meetings with each client per year, and # of public events per year can be adjusted to fit each program.

Services	Rate per Assignment (2 hour)**	# of Clients	# of Meetings with each Client/yr	# of Public Events/yr*	Encumbered
ASL	$150.00	5	4	2	$3,600.00

*Public event: When planning for meetings/events longer than 30 minutes, please be sure to schedule two ASL interpreters so they can switch off.

**State Rate for ASL may vary by state

COMMUNICATION ACCESS REALTIME TRANSLATION

Communication Access Realtime Translation (CART) is a service that provides an instant translation of the spoken word into English text using a stenotype machine, notebook computer, and real-time software. CART is essentially "live captioning", where the CART provider types into a stenographic machine that is connected to a computer. The computer, using special software, translates the stenotype shorthand into English which is simultaneously displayed on a computer monitor or can be projected onto a large wall.

CART services enable communication access for deaf and hard of hearing persons who are competent in English, both written and oral, and who either (a) are not able to use ASL interpreters, sign language transliterators, and/or oral interpreters in general or (b) do not choose to do so in the given situation.

Live captioning provides many benefits, including equal communication access, independence, freedom, confidence, anonymity, full participation, and independent understanding. It's not only for the deaf and hard of hearing, as many hearing people can benefit from the service.

The National Association of Court Reporters and Captioners (NCRA) offers a search function on their website to find a CART provider by your location: **NCRA PROLink | NCRA**

As does the National Verbatim Reports Association: **Member Search - National Verbatim Reporters Association**

And, The Legal Support Connection's National CART Database: **CART Provider Directory**

There are additional resources for CART services under "Choosing a Vendor" in Section II.

Services	Rate per assignment (2 hour)**	# of meetings with each client/yr	Encumbered
CART	$225.00	4	$1,125.00

*Note for CART: Minimum assignment duration for both On-Site Steno CART and Remote CART is typically two hours. Rates may vary by state.

ELECTRONIC DOCUMENT ACCESSIBILITY

SECTION 508 COMPLIANCE

"Section 508" is an amended subsection of the Rehabilitation Act of 1973. The Rehabilitation Act requires access to programs and activities funded by Federal agencies and to Federal employment in general. The various subsections in the statute specify how to meet the access requirement. The Rehabilitation of Act Amendments of 1998 was signed into law by President Clinton and required accessible electronic information and information technology provided by the Federal Government. Applying to all Federal Agencies when they develop, procure, maintain, or use electronic and information technology, the law requires that such technology is accessible and does not pose an undue burden to employees and members of the public.

Section 508 mainly applies to Federal websites and does not include private websites; however, it would be a critical oversight to disregard Section 508 Guidance for any website.

In a time where digital information and technology have become necessary in almost all facets of life, making our digital information accessible to more audiences furthers NNPHI's commitment to institutionalizing accessibility into all the technical assistance provided through our work. The following subsections outline some components that compliance with Section 508 could include. Keep in mind that accessibility work changes as quickly as associated technology advances. This information should be assessed at regular intervals to ensure efficiency and equity. The subsections covered are Document Accessibility, 508 Policy and Management concepts, and Website Accessibility.

DOCUMENT ACCESSIBILITY

People primarily think of Word, PowerPoint, or other Microsoft Office products when they think of digital documents. They may not know that Microsoft Office products have built-in functions that enable documents to be more accessible for users who may use screen readers, have partial vision impairment, or otherwise use alternative methods to access presented information. Each of these programs has varying levels of difficulty in producing accessible documents. Building accessible documents in Microsoft Office programs add the benefit of reducing the amount of remediation needed when converting to public-facing versions like PDF. TA providers can create and facilitate the creation of accessible documents that communicate and further the important work taking place in public health. Document accessibility is an important concept and technical skill. While these sections *are not* intended to create experts in document accessibility, they introduce concepts and knowledge that will help build accessible documents from the start. Infusing accessibility concepts into our work will enable it to reach wider audiences in both professional spaces and the communities we serve.

MICROSOFT WORD

Word is likely the most recognizable Microsoft product and the one used for creating base documents. Word conveys much of the information of daily work. A basic understanding of what makes a Word document accessible, with attention given to how the accessibility of Word documents affects the accessibility of the resulting PDF conversion, will help build inclusivity into deliverables. The following reviews Document Formatting and Text Formatting.

DOCUMENT FORMATTING

Document formatting refers to descriptive file names and titles, ensuring that the document format is ".docx" and that files are not password protected. Giving documents a descriptive title makes them more user-friendly. Adding titles and authors to documents also make any future conversion to PDF files closer to compliant. To add this information, select the File tab in the Microsoft Word ribbon and then choose Info. From there, click on the Properties button and then choose, as shown in the image to the left:

In the Advanced Properties dialog box, providing title and author information are minimum requirements. Instead of using a specific individual's name, it is common to use the organization's name as the author. Doing so ensures proper titling when converted to a PDF.
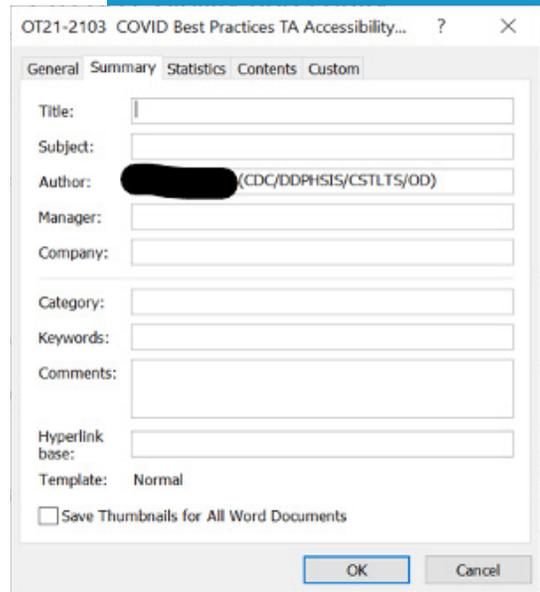

TEXT FORMATTING

Using Word's built-in formatting is a simple way to promote accessibility. The default heading styles in the Home tab of the Microsoft Word ribbon allow for keyboard and screen reader navigation of documents and reduce the amount of remedial words needed when converting to PDF. Headings should match what is in the Navigation Pane. It is not enough to bold or underline "normal text." Using the Heading functions, we can create an outline in the Navigation Pane for readers to follow. Open the Navigation Pane by selecting View in Word's ribbon, then check the Navigation Pane box:
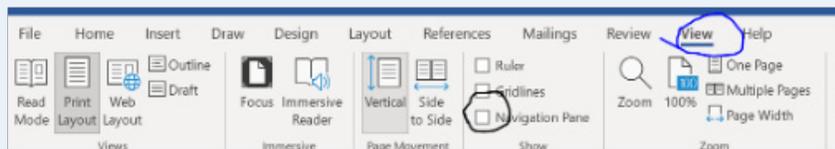

Once enabled, the Navigation Pane will open on the left side of the document, allowing the content creator to see the outline of the document:

The structure seen in the Navigation Pane will be read by screen readers and more easily navigated by keyboard. When choosing what to list as a heading, think about how the document should flow and deliver pertinent information. It is also important to note that while there is a built-in heading named "title," it does not work well for accessibility. For this reason, using Heading 1 for document titles is recommended. In practice, this means there should only be a single heading 1 for any document. All other pertinent headings are nested under H1.
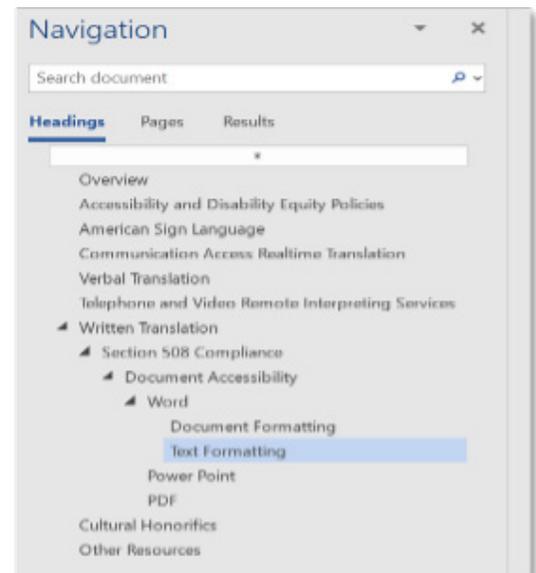
Another important aspect of text formatting is the proper formatting of lists. Assistive technology users cannot infer meaning if formatting is accomplished using the tab key, dashes, excessive spaces, or manual numbering. To check for these, use the "show/hide" function in Word by selecting the paragraph button on the Home tab in the Microsoft Word ribbon:

Using the built-in bulleting features is the best way to mitigate readability issues. To check the formatting, use the Reveal Formatting Pane by pressing Function Key (fn), Shift Key, and F1 Key simultaneously. A dialog box similar to the following will open on the right-hand side of your screen:

The dialog box shows you how Word is formatting the text in your document. If you see "Bullets and Numbering," you know your list feature is working properly.

To find out how to make a PDF accessible, test color contrast, and much more, please visit the **508 Accessibility Training website.**
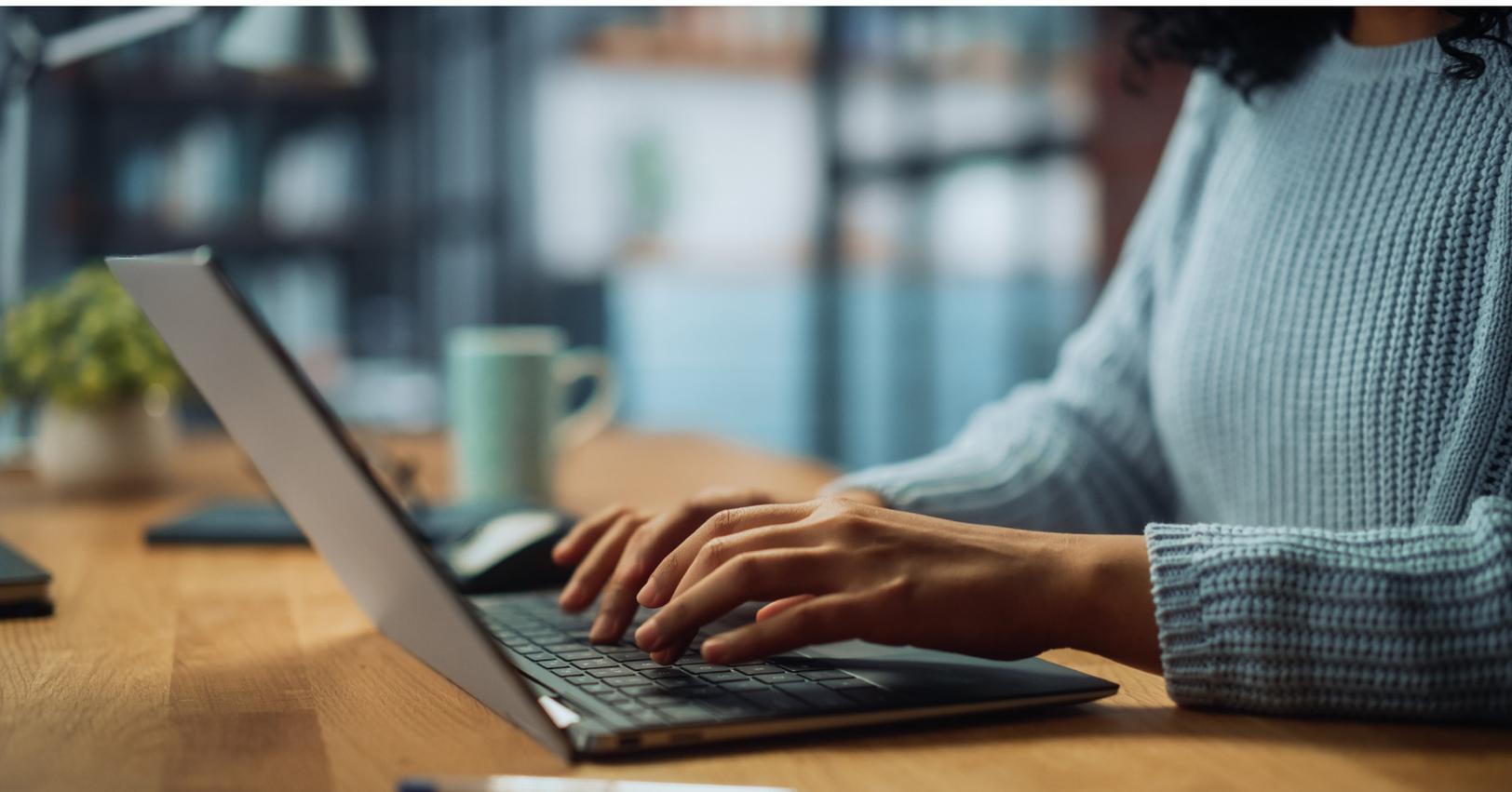
SECTION II:

Accessibility and Equity through Own-Language Use

ACCESSIBILITY AND EQUITY THROUGH LANGUAGE

Our audience includes all 50 states and the territories of Guam, American Samoa, Puerto Rico, the Northern Mariana Islands, and the U.S. Virgin Islands. To meet the diverse language needs of all populations and communities, the technical assistance provided should reflect the diversity in languages spoken and signed.

INTERPRETATION

Interpretation is the rendering of one spoken or signed language into that of another language. Interpreting requires fully understanding, analyzing, and processing a spoken message and then faithfully rendering it into another spoken or signed language. Interpreters must be able to accurately convey the meaning from one language to another in a culturally appropriate manner, mindful of the setting in which the information will be provided. There are three modes of interpreting: simultaneous interpreting, consecutive interpreting, and sight translation. When choosing languages for translation, be aware that the most appropriate language may require the provision of a specific dialect, pidgin, or creole language. This applies to vocal or signed languages.

Interpretation can be done face to face (in-person) or via telephone (called Telephonic Interpretation Services-TIS or Video Remote Interpretation-VRI).

BUDGETING FOR SPOKEN OR SIGN INTERPRETATION SERVICES

The number of languages and the number of clients can be adjusted based on each unique program.

Services	Rate per assignment (max payable rate is 2 hours)	# of lang	# of clients	Monthly	Encumbered
Face to Face Interpretation	$75.00	2	3	12	$5,400.00

*Public event: When planning for meetings/events longer than 30 minutes, please be sure to schedule two ASL interpreters so they can switch off.
**State Rate for ASL may vary by state.

The Refugee Health Technical Assistance Center created an excellent guide on working effectively with an Interpreter, as well as how to prepare for pre-sessions with an interpreter.

WRITTEN TRANSLATION SERVICES

As with other forms of translation, at its core, written translation is about providing meaningful access for all people to services, products, and general information. Translation is the written or text-based rendering of one language into a second language. A Written Translation Service may be needed to translate a TA document into a different language than it was originally written.

Additional Resources for Translation and Accessibly Written Materials Writing in Plain Language.

BUDGETING FOR WRITTEN TRANSLATION SERVICES

The calculation is based on 25 cents per word.

Services	Rate per Word	Unit	Encumbered
Translation	$0.25	1,000 Words	$250.00

Individuals also may request a note-taker for meetings to support effective communication. Budgeting considerations are like written translation services.

TELEPHONE AND VIDEO REMOTE INTERPRETING SERVICES

Telephone Interpreting Services (TIS) is a service that connects human interpreters via telephone to individuals who wish to speak to each other but do not share a common language. The telephone interpreter converts the spoken language from one language to another, enabling listeners and speakers to understand each other. This is commonly known as a "language line".

Video Remote Interpreting (VRI) is a video telecommunication service that uses devices such as tablets, web cameras, or videophones to provide sign language or spoken language interpreting services. Staff time is needed to ensure adequate internet connectivity and to train users who may have different experiences with VRI systems and software.

BUDGETING FOR TELEPHONE AND VIDEO REMOTE INTERPRETING SERVICES

Service costs are usually a per-minute rate.

Auxiliary Services	Rate per Minute	Minutes/Day	# of Days	Encumbered
Telephonic Interpretation Services (TIS)	$0.90	30	250	$6,750.00
Video Remote Interpretation (VRI)	$1.25	60	250	$18,750.00

* For VRI services, a computer with a microphone and camera is needed.

CHOOSING A VENDOR

There are many things to consider when choosing a vendor for translation services. One main thing to consider is certification and experience. A vendor should have the standard certification in their field of study. When looking for a vendor, get several quotes, which are commonly available upon request. Additionally, ask about the vendor's process, any training needed for organizational staff, and their experience with the target audience. Having different vendors identified can help support choice and privacy in arranging for accommodations and interpreter services. For example, rural individuals may not want a vendor used commonly in some settings, such as work or public meetings, to provide interpreter services in all settings, such as health care appointments or court proceedings.

LIST OF VENDORS

Most of the listed vendors translate in several languages, including ASL and written and verbal translations. Some provide CART. Please see their websites for the most up-to-date information.

Please note that this list is not exhaustive. There are many local, regional, and national options for ASL and language. We welcome the referral of any vendors you have successfully worked with to be added to this list. Please send any resources to covid19healthequity@nnphi.org. interpretation and translation services.

Vendor Name	Service
AlterEgo	Simultaneous Language Interpreting; Service formats include written, virtual, and in-person services
Certified Language International	On-demand phone; Video interpreting
Rapport International	Written and spoken multilingual communication; No mention of ASL or CART
Telelanguage Inc.	Offers over 200 languages, including ASL; Service formats include written, virtual, and in-person services; Charges by minute with no minimum
TRansFluenci, LLC	Interpreting (in-person only); Written Translating Services
Interpreters & Translators Inc.	Wide range of services; Video, remote, and in-person interpreting; Translation services, Language Lines, and CART
Bay State	150 languages and dialects; Secure file transfer; Written and Oral; Onsight translation; Voiceovers; Conference services; Portal for direct communication
Catholic Charities	Over 50 languages and over 20 cultures in their work community; Written and oral; Virtual; In-person; Transcription
CPSL USA Corporation	Written and oral; Virtual, in-person, and text translation; International work-focused
CTS Language Link	Very large organization; 300+ languages and dialects; In-person, virtual, and text translation
Fox Translation Services	110 languages including ASL; Virtual, over the phone, and text translation; Lots of government work
Interpreters Associates, Inc	Based out of MA; Education-focused; Offers continuing education classes for interpreters; Written translation
Language Bridge, LLC	Woman-owned; Online, on-phone, in-person; Text translation
Language Connections	Based out of MA; Over 200 languages- including ASL; Continual education courses; Audio and Video; In-person, virtual, and text translation; CART

EMAIL COMMUNICATION BEST PRACTICES FOR U.S. ISLAND TERRITORIES

Our partners at Association of State and Territorial Health Officials have sent the following guidance communications about working with U.S. Island territories such as Guam, American Samoa, Puerto Rico, Northern Mariana Islands, and the U.S. Virgin Islands.

Hierarchy and honorifics are important in the islands. To show respect, we should use their honorific and last name when addressing island leadership (i.e., Commissioner Encarnacion or Secretary Niedenthal). Names and titles are listed on the ASTHO member directory.

"Hello" is the shared business greeting for all U.S. jurisdiction, and we like to use the island specific greeting when possible. Feel free to use them or stick to English greetings.

- Alii – Palau

- Hafa Adai – CNMI, Guam

- Talofa – American Samoa

- Kaselehlie – Federated States of Micronesia

- Iakwe – Republic of the Marshall Islands

- Hola – Puerto Rico

- Hello – US Virgin Islands

Due to the significant time difference, it's best to send emails to people in the Pacific Island during our state-side evening. You can use the delay delivery feature to help manage your own time and reference. The Time and Date website for remembering the multiple time zones can be helpful around daylight savings time.
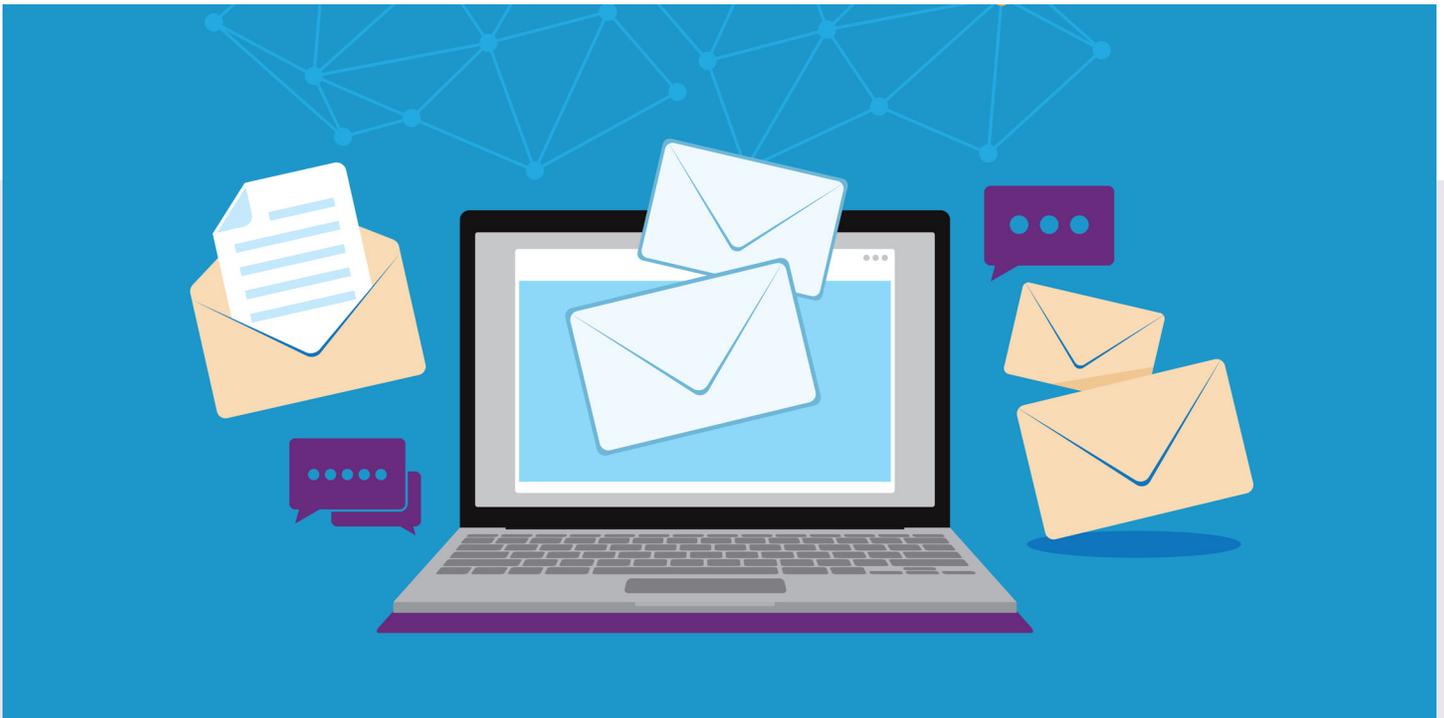
SECTION III:

Budgeting for Accessibility and Equity

PROCUREMENT/CONTRACTING EQUITY

WHY IS IT IMPORTANT?

Equitable contracting—as a policy, practice, and institutional culture—facilitates inclusive community economic growth. Helping small businesses, women-owned businesses, rural businesses, Disabled-owned businesses, including those owned by service-disabled veterans, and businesses owned by people of color thrive and grow increases the system's efficiency and attracts and assists talented new businesses to become potential partners. Economic equity in procurement means engaging a new and more diverse set of vendors and contractors.

Diversifying contractors and expanding the procurement processes produces broad community impacts, such as creating economically stronger communities, growing the middle class, and creating a more robust taxpayer base. Equity has a direct impact on the growth of businesses. Inclusion practices provide stable revenue sources and aid in the growth produced by gaining experience. Using barrier-free, well-defined, and transparent procurement processes allows for increased competition and higher-quality contractors.

Creating economic equity increases business growth for diverse and small businesses, creates stronger communities, and increases employment opportunities for everyone. It is also important to ensure equitable language, meaning culturally and linguistically appropriate and accessible to people with disability. The National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care (National CLAS standards) offers communication guidelines for health and health care organizations to provide services that account for an individual's health literacy, preferred language, cultural health beliefs and practices, and other communication needs.

HOW DOES MY ORGANIZATION ENSURE PROCUREMENT EQUITY?

When planning and conducting procurements, it is necessary to identify and remove systemic barriers, when feasible, to diverse and small business engagement. The key building blocks of a contracting equity program are a transparent policy that demonstrates the buy-in of the communities' elected officials, a multi-faceted strategy verified by outcomes and community feedback, executive office support, and a continuous process of enhancing the program. The most successful strategies include performing an analysis of the existing disparities and barriers present throughout your community in contracting; setting well-defined goals; providing procurement navigation resources; and strategically inviting-in small businesses, women-owned businesses, Disabled-owned, including service-disabled veteran businesses, rural businesses, and businesses owned by people of color. It is important to implement not only race- and gender-conscious strategies but also small business and local business-focused ones. Overall, procurement equity should strive to build trust and increase access.

OTHER BUDGETING RESOURCES

- [Using Government Procurement to Advance Racial Equity](#)

- [Culture, Collaboration and Capital: Leveraging Procurement for Economic Equity](#)

- [The Commonwealth of Massachusetts Diverse and Small Business Program Policies for Goods and Services Procurements](#)

- [Cities and Businesses of Color: A Guide to Economic Growth](#)

- [Contracting for Equity](#)

- [CLAS Standards Training and Resources](#)

- [The National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care Review](#)

- [Building Accessibility into Your Procurement Process](#)

- [Disability:IN. Procurement Access](#)

National Network of Public Health Institutes