



**TO:** University Council

**FROM:** Marlina Rogers, Compliance Counsel, Office of University Compliance  
Harden Scragg, Staff Attorney and Policy Counsel

**DATE:** February 24, 2022

**RE:** Policy on Limited English Proficiency

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**I. Introduction.**

This policy describes how East Tennessee State University (ETSU), as a recipient of federal funds, under Title VI of the Civil Rights Act of 1964, fulfills its obligation to take reasonable steps to provide persons with limited English proficiency (LEP) with meaningful access to ETSU activities, programs, and services.

This policy is attached below.

**II. Public Comment Period.**

The policy was posted from for public comment from 2/7/2022 to 2/18/2022. No comments were submitted during this period. However, the policy was revised to make certain non-substantive changes recommended by Dr. Susan Epps:

1. Use of the second-person “You” was removed.
2. The repeated reference to “LEP persons” was replaced with people first language “persons with LEP,” which is more appropriate and consistent with the federal HHS definition.



Policy on Limited  
English Proficiency 2

