

**GNRC RESOLUTION 2017-07**

**A RESOLUTION ADOPTING NEW AND AMENDED POLICIES AND PROCEDURES**

**WHEREAS**, the Greater Nashville Regional Council (GNRC) desires to adopt the following new policies and procedures; and

**WHEREAS**, these policies and procedures are necessary to provide clarity and transparency to staff and the communities that GNRC serves; and

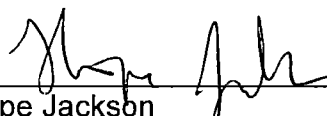
**WHEREAS**, the GNRC Personnel and Finance Committee has reviewed and recommends adoption of the new policies and procedures as set forth below:

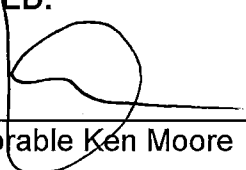
- Appointment Procedure for the Executive Director and Interim Executive Director
- Procedure for filling open GNRC positions
- Limited English Proficiency (LEP) policy
- Non-discrimination Policy and Complaint Procedure
- Sexual Harassment Policy
- Substance Abuse Policy
- Open Records Policy
- Front Desk Visitor Sign-In Policy
- Web 2.0 Use Policy and External Guidelines

**NOW, THEREFORE, BE IT RESOLVED**, by the Executive Committee of Greater Nashville Regional Council that the policies and procedures described above are hereby approved and adopted.


**RESOLVED**, this 16<sup>th</sup> day of November, 2016, the public health, safety, order, prosperity, and general welfare of the citizens of this region requiring it.

**APPROVED AS TO FORM AND LEGALITY: APPROVED:**

  
\_\_\_\_\_  
Hope Jackson  
Chief Legal Counsel

  
\_\_\_\_\_  
The Honorable Ken Moore  
President

**ATTEST:**

  
\_\_\_\_\_  
Michael Skipper  
Executive Director and Secretary

## LIMITED ENGLISH PROFICIENCY (LEP) POLICY

### Policy Statement

GNRC will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in services, activities, programs and other benefits. The policy of GNRC is to ensure meaningful communication with persons that experience LEP and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, applications for services, complaint forms, notices and waivers of rights and consent forms. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services.

All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

GNRC will conduct a regular review of the language access needs of our service population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

### Procedures

The following procedures should be used by GNRC employees to make accommodations for LEP individuals:

#### 1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE:

GNRC will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards") (see attachment A) or posters to determine the language. In addition, when records are kept of past interactions with individuals or their family members, the language used to communicate with the LEP person will be included as part of the record.

#### 2. OBTAINING A QUALIFIED INTERPRETER:

The HR Manager is responsible for:

- Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff (*see attachment B*);

The Office Manager is responsible for:

- Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

*Avaza Language Services Corp.* has agreed to provide qualified interpretation and translation services for GNRC. Assistance is available over 150 languages and dialects. Avaza's local telephone number is 615-534-3405 or toll free 1-800-482-8292, and the hours of availability are 24 hours a day/ 7 days a week.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, **family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department or agency.** Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children (e.g. persons under the age of 18) will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

### 3. PROVIDING WRITTEN TRANSLATIONS:

When translation of vital documents is needed, each division or agency in GNRC will submit documents to the Office Manager for submission to Avaza Language Services Corp. for timely translation into the needed language. Original documents being submitted for translation will be in final, approved form.

GNRC will set benchmarks for translation of vital documents into additional languages over time.

### 4. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, GNRC will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, GNRC will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, and feedback from the public and community organizations.