

POWER OF PUTNAM, INC.

TITLE VI NON-DISCRIMINATION POLICY

Power of Putnam shall take affirmative action to ensure that all employees and service recipients are treated without discrimination with regard to age, race, color, gender, ethnicity, religion, disability, political affiliation, national origin, or any other point of discrimination recognized at the time. This policy is to prevail throughout all programs, services, and activities being provided by Power of Putnam.

It is the policy of Power of Putnam to comply with Section 601 of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d et seq., which states that “no person in the United States shall on the basis 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.”

Prohibited practices include, but are not limited to, the following:

- Denial of any service recipient, any services, opportunities, or other benefits for which that individual is otherwise qualified;
- Provide any service recipient with any service, or other benefit, which is different or is provided in a different manner from that which is provided to others in a program;
- Subject any service recipient to segregated or separate treatment in any manner related to receipt of service;
- Restrict a service recipient in any way in the employment of services, facilities or any other advantage, privilege or other benefit provided to others under the program;
- Adopt methods of administration which would limit participation by any group of recipients or subject them to discrimination; and
- Address a service recipient in a manner that denotes inferiority because of race, color, or national origin.

Therefore we adhere to the following procedures:

- Conduct Title VI training for all new employees and volunteers within the first 30 days of employment or volunteer service
- Conduct or verify annual Title VI training for board members, staff, contractors, coalition members, and volunteers
- Inform service recipients of their rights under Title VI
- Display and distribute Title VI posters and brochures in the office and at events
- Conduct internal Title VI monitoring activities to ensure compliance
- Maintain a complaint log and conduct investigations when necessary
- Annual submission of the Title VI Compliance Plan

Complaint Procedure

A complaint alleging discrimination may be filed with the Title VI coordinator. The Title VI coordinator has the responsibility for receiving, logging, acknowledging, investigating complaints, and reporting the findings. The coordinator will notify the Executive Director when

a complaint is received. After receiving a complaint or identifying potential discriminating activity, the coalition will take the following steps:

Within 30 calendar days of receiving the complaint, the Title VI coordinator will conduct a fact-finding investigation. The coordinator will meet with the complainant or the staff member who identified the alleged discriminatory activity to determine the nature of the complaint and whether Title VI requirements were violated. The coordinator will meet with the staff member(s) in whose area the alleged violation occurred to ascertain their perspective on the complaint. The Title VI coordinator will then notify the members of the **Title VI Review Committee**.

If the Title VI coordinator determines that discrimination has not occurred, the complainant and the Executive Director will be informed. The complainant will then have a right to appeal the decision.

If the investigation indicates that discrimination did in fact occur, it will be discussed with the appropriate grant coordinator or the staff member(s) in whose area the complaint was filed. The Title VI coordinator will discuss ways in which to resolve the complaint and seek voluntary corrective action.

Any rulings made by the Title VI coordinator may be appealed to the **Title VI Review Committee** within 10 calendar days of the receipt of the written findings. The request can include relevant documentation and sworn testimony, if any, from the appealing party, together with any testimony by witnesses having first-hand knowledge of the Title VI violation. The testimony may be in the form of an affidavit and shall describe in detail the circumstances and events that would lead a reasonable person to believe that a Title VI violation has occurred. **The Title VI Review Committee** will have broad latitude to review an appealed case and make a finding. The committee may discuss the complaint with the complainant, the alleged offender, the Title VI coordinator or other parties to determine the facts. The **Title VI Review Committee** will make a finding on the appeal within 15 calendar days of receipt of the request for appeal.

If the **Title VI Review Committee** cannot resolve the discriminatory activity, a written report on the situation will be prepared and forwarded to the Tennessee Human Rights Commission. If a complaint involves one of the coalition's Federally funded programs, the federal agency sponsoring the program will also be notified. Information will also be provided to the parties involved on the procedures for appealing to the Federal level.

If either the Tennessee Human Rights Commission, or other Federal agency determines that discrimination has in fact occurred, the offending party will be denied further services or benefits of the department's programs until the discriminatory activities have been terminated.

Title VI Retaliation

It is illegal for Power of Putnam to "retaliate" against service recipients because they filed a charge of discrimination or because they complained to another entity about program services

discrimination, or because they participated in a discrimination proceeding (such as an investigation or lawsuit).

Further, it is illegal for Power of Putnam to refuse to provide program services because a service recipient filed a charge of discrimination with an entity such as this agency, or Tennessee Human Rights Commission, or Tennessee Department of Mental Health and Substance Abuse Services, or the Federal Office of Civil Rights, even if later it was determined that no discrimination occurred.

Should a service recipient feel that they are being retaliated against, they have the right to submit a complaint to an entity that they feel most comfortable with for review and resolution (Attachment1).

Accessibility: Power of Putnam staff is responsible for insuring that all meetings and programs are held in facilities that are accessible to people with disabilities. In addition, all print materials (brochures, registrations, etc.) will include information regarding the availability of auxiliary services and aids.

POLICY AND PROCEDURES FOR COMMUNICATION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY

POLICY:

“Limited English Proficiency” (LEP) is defined as the inability to speak, read, write, or understand the English language at a level that permits a service recipient to interact effectively with the coalition in accessing public services and benefits. Power of Putnam will take reasonable steps to ensure that persons with LEP have meaningful access to and an equal opportunity to participate in its services, activities, programs and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person being served, and service recipients will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of interpreters or arrangements with local organizations providing interpretation or translation services. All staff will be provided notice of this policy, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

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

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

Power of Putnam 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”) or posters to determine the language (Attachment 2).

2. OBTAINING A QUALIFIED INTERPRETER

The Executive Director is responsible for maintaining an accurate and current list showing the name, language, and contact information of outside interpreter(s) available in its geographic service area.

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 LEP person has been made by the coalition. 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 under the age of 16 will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

When translation of printed materials is needed, these materials will be translated into frequently encountered languages within the coalition’s geographic service area. The coalition will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

4. PROVIDING NOTICE TO LEP PERSONS

Power of Putnam will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs will be posted and provided in intake areas and other points of entry.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, Power of Putnam will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, Power of Putnam will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services and complaints filed by LEP persons.