



Ending Hunger & Poverty at the Root

4000 N 7<sup>th</sup> St, Ste 118 Phoenix, AZ 85014

## POLICY AND NOTICE OF NONDISCRIMINATION

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) complies with Federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:

- *Title VI of the Civil Rights Act of 1964*, which prohibits discrimination based on **race, color, or national origin** (including **language**).
- *Section 504 of the Rehabilitation Act of 1973*, which prohibits discrimination based on **disability**.
- *Title IX of the Education Amendments Act of 1972*, which prohibits discrimination based on **sex** in education programs or activities.
- *Age Discrimination Act of 1975*, which prohibits discrimination based on **age**.
- *U.S. Department of Homeland Security regulation 6 C.F.R. Part 19*, which prohibits discrimination based on **religion** in social service programs.

It is against the law for World Hunger Ecumenical Arizona Task Force Inc (WHEAT) to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

### To File a Complaint

If you think that World Hunger Ecumenical Arizona Task Force Inc (WHEAT) has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint in person or by mail, fax or email with:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

**U.S. Mail:**

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Civil Rights and Civil Liberties Compliance

4000 N 7<sup>th</sup> St, Ste 118

Phoenix, AZ 85014

You can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit your complaint)

**Fax:** 202-401-4708

**U.S. Mail:**

U.S. Department of Homeland Security  
Office for Civil Rights and Civil Liberties  
Compliance Branch, Mail Stop #0190  
2707 Martin Luther King, Jr. Ave., SE  
Washington, D.C. 20528

For additional information: [www.dhs.gov/crcl](http://www.dhs.gov/crcl)  
Phone: 202-401-1474 Toll-Free: 1-866-644-8360



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## NORMA Y NOTIFICACIÓN DE AVISO DE NO DISCRIMINACIÓN

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) cumple con las leyes federales de derechos civiles y está comprometido a proporcionar programas y servicios libres de discriminación, de conformidad con:

- *Título VI de la Ley de Derechos Civiles de 1964*, que prohíbe la discriminación basada en la **raza, color, o nacionalidad** (incluido el **idioma**).
- *Artículo 504 de la Ley de Rehabilitación de 1973*, que prohíbe la discriminación basada en la **discapacidad**.
- *Título IX de la Ley de Enmiendas a la Educación de 1972*, que prohíbe la discriminación basada en el **sexo** en los programas o actividades educativos.
- *Ley de Discriminación por Edad de 1975*, que prohíbe la discriminación basada en la **edad**.
- *Normativa 6, Parte 19, del Código de Regulaciones Federales (C.F.R.) del Departamento de Seguridad de EE. UU.*, que prohíbe la discriminación basada en la **religión** en los programas de servicios sociales.

Es contrario a la ley que World Hunger Ecumenical Arizona Task Force Inc (WHEAT) tome represalias contra cualquier persona que tome medidas para oponerse a la discriminación, presente una queja o participen la investigación de una queja de acuerdo con las autoridades anteriores.

### Para presentar una queja

Si considera que World Hunger Ecumenical Arizona Task Force Inc (WHEAT) no ha proporcionado estos servicios, o ha discriminado de cualquier otra manera por motivos de raza, color, nacionalidad (incluido el idioma), discapacidad, sexo, o edad, puede presentar una queja en persona o por correo postal, fax o correo electrónico a:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

**U.S. Mail:**

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Civil Rights and Civil Liberties Compliance

4000 N 7<sup>th</sup> St, Ste 118

Phoenix, AZ 85014

Asimismo, puede presentar una queja de derechos civiles ante la Oficina de Derechos Civiles y Libertades Civiles (CRCL) del Departamento de Seguridad Nacional de EE. UU.:

**Correo electrónico:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov)

(la forma más rápida de presentar su queja)

**Fax:** 202-401-4708

**Correo postal de EE. UU.:**

U.S. Department of Homeland Security

Office for Civil Rights and Civil Liberties

Compliance Branch, Mail Stop #0190

2707 Martin Luther King, Jr. Ave., SE

Washington, D.C. 20528

Para obtener más información: [www.dhs.gov/crcl](http://www.dhs.gov/crcl)

Teléfono: 202-401-1474 Línea gratuita: 1-866-644-836



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## Information and Services for Persons with Disabilities and Persons with Limited English Proficiency

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

- Provides free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities.
- Provides free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency.

### **If you need these services, please contact:**

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

### **U.S. Mail:**

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Civil Rights and Civil Liberties Compliance

4000 N 7<sup>th</sup> St, Ste 118

Phoenix, AZ 85014



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## Información y servicios para personas con discapacidades o con dominio limitado del inglés

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

- Ofrece asistencia y servicios gratuitos, como servicio profesional de intérpretes de lengua de señas, e información escrita en otros formatos (letra grande, audio, electrónico, etc.) para permitir una comunicación eficiente con personas con discapacidades.
- Ofrece servicio gratuito de idiomas, como servicio profesional de intérpretes de idiomas extranjeros e información escrita en otros idiomas, para garantizar el acceso satisfactorio
- a programas y actividades para personas con dominio limitado del inglés.

### Si necesita estos servicios, comuníquese con:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

### U.S. Mail:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Civil Rights and Civil Liberties Compliance

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## DISCRIMINATION COMPLAINTS PROCESS.

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) notifies the public on the process for filing a complaint by posting the process at [HungerHurts.org](https://HungerHurts.org), with posters referencing the online link in facilities, in program materials.

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will accept and respond to discrimination complaints made against it by its program beneficiaries (e.g., program participants, customers, clients, consumers, members of the public) alleging discrimination in the recipient's programs and activities by the immediate reporting of the matter to the Chief Executive Officer (CEO).

The Chief Executive Officer (CEO) is responsible for overseeing recipient compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title IX of the Educations Amendments of 1972.

The CEO's responsibilities include processing complaints filed by program beneficiaries, overseeing the discrimination complaints process, developing and updating civil rights policies and procedures, training staff on civil rights policies, processing and responding to requests from the public for reasonable accommodation, coordinating the translation of documents and processing requests for language interpretation.

Program participants, customers, clients, consumers and members of the public alleging failure to provide services or experiencing discrimination in another way based on race, color, national origin (including language), disability, sex, age, or religion, can file a written complaint in person or by mail, fax or email to:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

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Phoenix, AZ 85014



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They can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit your complaint)

**Fax:** 202-401-4708

**U.S. Mail:**

U.S. Department of Homeland Security  
Office for Civil Rights and Civil Liberties  
Compliance Branch, Mail Stop #0190  
2707 Martin Luther King, Jr. Ave., SE  
Washington, D.C. 20528

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will provide free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities throughout the complaints process.

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will provide free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency throughout the complaints process.

Once the complaint has been reported World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will:

- will provide the client, customer, program participant, or consumer with written acknowledgement of the complaint, via email, within 10 days of receipt;
- will correspond with the complainant throughout the investigation via email on status of the complaint, its investigation, referral of the complaint to another agency or agencies for investigation and resolution,.

The complaint will be promptly investigated. The investigation will be conducted in a confidential manner to the extent consistent with the need to investigate and evaluate the complaint. The procedure for reporting incidents of discriminatory or harassing behavior is not intended to prevent the right of any program participants, customers, clients, consumers, members of the public to seek a remedy under available state or federal law by immediately reporting the matter to the appropriate state or federal agency.

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will:

- Begin an internal investigation of the complaint within 10 days of receipt that may include:
  - Inquiring whether the individual has filed the complaint with another agency, such as CRCL, in order to prevent duplicative investigations. If the individual has submitted dual filings,

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will contact the relevant agency to determine a coordination approach.

- Carefully reviewing the complaint and applicable laws that prohibit discrimination.
  - Referral of the complaint for investigation by a qualified law firm.
  - Conducting and documenting an investigation that may include a variety of fact-finding methods such as interviews, a fact-finding conference, requests for information, interrogatories, and/or affidavits.
  - Speaking to witnesses and the accused.
  - Reviewing the documents.
  - Avoiding retaliation.
  - Taking appropriate remedial action.
  - Referring the complaint, when necessary, including but not limited to complaints involving a crime, to an appropriate external agency within 30 days of receipt.
- When necessary, the complaint will be referred to an appropriate external agency for investigation within 30 days of receipt, including but not limited to:
    - Arizona Attorney General (AG), Civil Rights Division  
Address: 2005 N. Central Avenue, Phoenix, AZ 85004  
Phone: (602) 542-5025
    - U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL)  
**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov)  
**Fax:** 202-401-4708  
**U.S. Mail:**  
U.S. Department of Homeland Security  
Office for Civil Rights and Civil Liberties  
Compliance Branch, Mail Stop #0190  
2707 Martin Luther King, Jr. Ave., SE  
Washington, D.C. 20528

**TRACKING.** World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will track complaints received along with the status in a secured database inclusive of all documents pertaining to the complaint.

**NO RETALIATION.** No retaliatory action will be taken against any person who in good faith reports conduct that she or he believes may violate this Policy. No retaliatory action will be taken against any individual for assisting or participating in an investigation, proceeding or hearing related to a harassment complaint.

**DISCIPLINARY MEASURES.** Where an employee is determined to have violated this Policy, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will take disciplinary action, up to and including termination. Where a non-employee is determined to have violated this Policy, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) terminate the non-employee's participation with the Organization at all levels.



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**TRAINING.** All employees, supervisors, and management personnel will be required to attend mandatory anti-discrimination, anti-harassment, and/or anti-sexual harassment training of a kind as designated by World Hunger Ecumenical Arizona Task-Force Inc (WHEAT).



## Reasonable Accommodations for Individuals with Disabilities

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) provides free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities.

### NOTICE

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) is committed to providing individuals with disabilities an **equal opportunity** to participate in and benefit from World Hunger Ecumenical Arizona Task Force Inc's (WHEAT) programs, activities, and services.

Individuals may request **reasonable accommodations** from World Hunger Ecumenical Arizona Task Force Inc (WHEAT) that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services.

To request reasonable accommodations, contact

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)  
Tamera Zivic, CEO  
**Phone:** 602-955-5076  
**E-mail:** wheat@HungerHurts.org (fastest method to submit your complaint)  
**Fax:** 602-955-5290  
**U.S. Mail:**  
World Hunger Ecumenical Arizona Task Force Inc (WHEAT)  
Reasonable Accommodations Request  
4000 N 7<sup>th</sup> St, Ste 118  
Phoenix, AZ 85014

### FREQUENTLY ASKED QUESTIONS (FAQ)

The following FAQ provides information on requesting reasonable accommodations in World Hunger Ecumenical Arizona Task Force Inc (WHEAT) programs and activities.

#### **1. What is a reasonable accommodation in World Hunger Ecumenical Arizona Task Force Inc's (WHEAT) program?**

A reasonable accommodation is a change or modification to afford a qualified individual with a disability full enjoyment of [Recipient's] programs or activities, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to [Recipient].

## 2. How do I request a reasonable accommodation?

If you need a reasonable accommodation, please contact

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Tamera Zivic, CEO

**Phone:** 602-955-5076

**E-mail:** wheat@HungerHurts.org (fastest method to submit your complaint)

**Fax:** 602-955-5290

**U.S. Mail:**

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Reasonable Accommodations Request

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Phoenix, AZ 85014

## 3. Does my request for a reasonable accommodation need to be in writing?

No, you do not need to put your request in writing, however, making a written request can be helpful documentation for ensuring that World Hunger Ecumenical Arizona Task Force Inc (WHEAT) provides the desired accommodation. In addition, you do not need to use the specific words “reasonable accommodations” when making your request.

## 4. When should I request a reasonable accommodation?

You may request a reasonable accommodation from World Hunger Ecumenical Arizona Task Force Inc (WHEAT) at any time. However, making the request in advance of a meeting, conference call, or visit will help ensure that World Hunger Ecumenical Arizona Task Force Inc (WHEAT) is able to fulfill the request for an accommodation.

For certain requests, such as requests for sign language interpretation, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) requests at least two week’s advance notice.

## 5. May someone request a reasonable accommodation on my behalf?

Yes, anyone can request a reasonable accommodation on behalf of an individual with a disability who seeks to interact with World Hunger Ecumenical Arizona Task Force Inc (WHEAT) staff or participate in its programs or activities.

## 6. What will World Hunger Ecumenical Arizona Task Force Inc (WHEAT) do upon receiving my request for a reasonable accommodation?

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) may contact you to obtain more information about your request and to better understand your needs. In addition, World Hunger Ecumenical Arizona

Task Force Inc (WHEAT) may review your request to determine:

- Whether the requested accommodation will be effective in allowing you to participate in the activity or program in which you are seeking participation;
- Whether the requested accommodation is reasonable, or an equally effective alternative to the requested accommodation is available; and
- Whether providing you with the requested accommodation would fundamentally alter the nature of [Recipient's] program or impose undue financial or administrative burdens on [Recipient].

In addition, in some cases, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) may consult with you in an interactive process to determine on a case-by-case basis what accommodations can be made.

If World Hunger Ecumenical Arizona Task Force Inc (WHEAT) determines that your requested accommodation would fundamentally alter the nature of the program or impose an undue financial or administrative burden, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) may deny your request. However, in the unlikely event that this occurs, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) will work with you to identify an alternative accommodation that allows you to effectively participate in World Hunger Ecumenical Arizona Task Force Inc's (WHEAT) program, activity, or service.

**7. May World Hunger Ecumenical Arizona Task Force Inc (WHEAT) request medical documentation from you after receiving your request for a reasonable accommodation?**

No, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) may not request medical documentation after receiving your request for a reasonable accommodation. [Recipient's] questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.

**8. May World Hunger Ecumenical Arizona Task Force Inc (WHEAT) charge you the cost of providing the reasonable accommodation?**

No, you are not responsible for the cost of an auxiliary aid or service World Hunger Ecumenical Arizona Task Force Inc (WHEAT) provides to you.

**9. What are some examples of reasonable accommodations?**

There are many types of reasonable accommodations. Some examples of how World Hunger Ecumenical Arizona Task Force Inc (WHEAT) provides reasonable accommodations include:

- Arranging for qualified sign language interpreters
- Providing on-site captioning
- Producing alternate formats of print materials in braille, large print, or in an electronic format
- Providing remote conference captioning services



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- Furnishing a temporary ramp to access the dais or other areas with one or more stairs to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker.



## Language Access Policy and Procedures

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) provides free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency (LEP).

World Hunger Ecumenical Arizona Task Force Inc (WHEAT) is a culturally sensitive anti-hunger and poverty organization providing services to program participants, customers, clients, consumers, members of the public. Our language access policy is to provide all services without discrimination, in order to ensure meaningful access for all limited English proficient (LEP) individuals. World Hunger Ecumenical Arizona Task Force Inc (WHEAT) and its staff and volunteers will provide services in a reasonable time and manner, at no cost to the program participants, customers, program participants, customers, clients, consumers, members of the public, consumers, members of the public.

As an agency that receives federal funding, this policy establishes guidelines for language access that is in compliance with Title VI of the Civil Rights Act, the American with Disabilities Act, Executive Orders as well as state and City laws that relate to language access.

In the Greater Phoenix Metropolitan area of Arizona, 74.0% of people in the Phoenix-Mesa, AZ speak only English at home. The following are the non-English languages spoken in and around Phoenix as reported in the 2020 U.S. Census Bureau Report: Spanish, Chinese, Tagalog, Arabic, Vietnamese, Hindi, Navajo, German, French, Somali. (See table in Appendix)

### ***Language Assistance Procedures***

#### **Identifying language needs and preferred language**

- A. **Identify need**: At the initial point of contact, staff and volunteers need to keep in mind the need for language access for all individuals. Staff and volunteers should be aware that not everyone speaks English or prefers to speak English.
  - a. Notification of rights: Program participants, customers, clients, consumers, members of the public should be informed that they have the right to receive services in their preferred language.
  - b. There are signs in visible locations to notify that they have language access at no cost. This notice will be translated into World Hunger Ecumenical Arizona Task Force

- Inc's (WHEAT) core languages.
- c. The information will also be provided to individual on the Certified Languages International helpline, available in all World Hunger Ecumenical Arizona Task Force Inc's (WHEAT) core languages.
- B. Identify language:**
- a. The LEP individual may speak more than one language or may have limited proficiency in a secondary language. Staff and volunteers should identify the preferred language of the LEP individual and work to provide assistance in that language. Preferred language should be chosen by the client.
  - b. Staff and volunteers should assess other languages spoken prior to services provided to identify the preferred language of service.
  - c. To assess the need for language, staff and volunteers should ask open-ended questions and avoid questions that would allow for yes or no answers. This is done to eliminate guesswork based often on stereotypes.
  - d. Staff and volunteers may request the assistance of a bilingual/multilingual staff in the identification of the language or dialect.
  - e. Staff and volunteers use the DHS "I speak" card or poster to help identify the languages spoken by the client.
  - f. A Deaf individual may also have limited English proficiency and may not be proficient in American Sign Language (ASL). Staff and volunteers should work to identify the preferred language and provide language access for the individual in their preferred language. If the individual is deaf or hard of hearing, the Advocate should use the 'I speak' card to help identify the language signed by the individual.

### **Procedures for language services**

There are three main points of contact for World Hunger Ecumenical Arizona Task Force Inc (WHEAT) program participants, customers, clients, consumers, members of the public – 1) phone assistance; 2) in-person services; and 3) Agency referral.

- A. Phone assistance** - If a caller is requesting services in a language not spoken by the staff and volunteers answering the call:
- a. Staff and volunteers should access the staff language list to view which staff or volunteer members, if any, that speak the language of the individual requesting services.

- b. Transfer the call to the Certified Languages group that corresponds with the requested language.
  - c. If none of the above methods is available, make a call to the request-language voicemail so that the caller can leave a message. They will return the call with a staffer that speaks that language and will follow up with the client.
  - d. If a client is willing to communicate in simple English, try to take the caller's information so that a staff member speaking the preferred language can contact the individual. A call back might also be necessary if no one on staff speaks that language, as we would need to arrange for a volunteer to interpret or access language line services.
- B. In-person Services - If a person is requesting services in a language not spoken by the staff and volunteers:
- a. Staff and volunteers should access the staff language list to view which staff or volunteer members, if any, that speak the language of the individual requesting services.
  - b. Make a call to the Certified Languages group that corresponds with the requested language.
  - c. If none of the above methods is available, make a call to the request-language voicemail so that the caller can leave a message. They will return the call with a staffer that speaks that language and will follow up with the client.
  - d. If a client is willing to communicate in simple English, try to take their information so that a staff member speaking the preferred language can contact the individual. A return visit might also be necessary if no one on staff speaks that language, as we would need to arrange for a volunteer to interpret or access language line services.
- C. Agency Referral
- a. Suggest that the referring agency send an interpreter from their agency who is working with the client.
  - b. If the referring agency cannot send an interpreter with the client, ask if they know what language the client prefers.
  - c. Staff and volunteers should access the staff language list to view which staff or volunteer members, if any, that speak the language of the individual requesting services.
  - d. Make a call to the Certified Languages group that corresponds with the requested

- language.
- e. If none of the above methods is available, make a call to the request-language voicemail so that the caller can leave a message. They will return the call with a staffer that speaks that language and will follow up with the client.
  - f. If a client is willing to communicate in simple English, try to take their information so that a staff member speaking the preferred language can contact the individual. A return visit might also be necessary if no one on staff speaks that language, as we would need to arrange for a volunteer to interpret or access language line services.

### **Individual accessing services who is deaf or hard of hearing**

- A. Staff and volunteers should identify what is the deaf individual's preferred mode of communication, for example, video conferencing or TTY, emailing or text.
- B. 711 may be used for phone relay services to communicate with individuals who are deaf or hard of hearing.
- C. If the individual would like to use ASL or another form of sign language interpreter, the staff or volunteer should arrange for the sign language interpreter including arranging for video interpretation if needed.
- D. Staff and volunteers should offer referrals to agencies that specialize in services to deaf or hard of hearing individuals; however, staff and volunteers should never deny services from the client simply because of their language need, including sign language.

### **Translation of Vital documents**

- A. Vital documents- World Hunger Ecumenical Arizona Task Force Inc (WHEAT) has no vital documents that are used in the course of business.
- B. Sight translation for other documents –
  - a. If document is not translated into a language they, staff and volunteers should sight translate the document, or arrange for an interpreter who can sight translate the document with client's permission.
  - b. There should be an indication on the form that it has been sight translated for them by staff or an interpreter who client authorizes to translate for them.
  - c. A client does have a right to refuse to sign the acknowledgment of sight translation or refuse to sign any documents not in their language. Staff or volunteers should try their

best to find a way to translate the document but must inform client that some services might be delayed.

**Interpreting and Translating**

- A. Prohibition against using children as interpreters Children should not ever be used to interpret for individuals when receiving services. The only time they can be used is in the identification of the individual's preferred language and life-threatening medical emergencies.
  
- B. Staff and volunteers Staff and volunteers should NOT act as an interpreter for program participants, customers, clients, consumers, members of the public in a setting in which they are legally required to provide language access. For example, if client is seeing their attorney for legal services or applying for benefits through the public assistance office. The Staff and volunteers role should be to ensure that the client is receiving meaningful language access.
  - a. Legal Services: World Hunger Ecumenical Arizona Task Force Inc (WHEAT) does not provide legal services of any kind. In a legal setting, which is when an attorney meets with their client, staff and volunteers should **n o t** play the role as an interpreter. They will provide an external interpreter and will not be present.
  - b. Government agency: Since government agencies are required by law to provided language access, Staff and volunteers should attempt to aid in ensuring the client is provided with access. If that does not occur, they can assist. The only time they should not step in an assist is any court proceedings.

If in any instance a staff or volunteer does play the role as an interpreter, the following should occur:

- C. Accuracy
  - a. Staff and volunteers should ensure that the rendition sounds natural in the preferred language and there is no distortion of the original message.
  - b. Translate documents If they are translating written documents they should ensure the following:
    - 1. The Staff and volunteers will ensure that the document is translated accurately
    - 2. The Staff and volunteers should ensure that the document has been read by another individual who is fluent in the language of the



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document who can check the accuracy.

D. Impartiality

- a. When Staff and volunteers are acting in the role of interpreter or translator, they shall maintain impartiality.
- b. Their role is not to counsel, advise or project their own judgement or belief.

E. Confidentiality

- a. Anything that is interpreted or translated should be kept confidential at all times.
- b. If an individual that you are working with, asks that the information be provided to a third party, written consent is needed.

**Internal Compliance**

A. Staff compliance

- a. Every staff and volunteer will receive training on the policy at least once a year.
- b. Included in the training will be an overview of the policy, overview of federal, state and city mandates, identifying and providing language services and working with deaf or hard of hearing individuals.
- c. Recordings of this training will be provided in the event that a staff or volunteer comes on board at a time where no trainings will be conducted.

B. Internal Language Access Contacts

The organization has a Language Access committee (LAC). To reach the committee please email at [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org)

C. Language Data, Monitoring and Assessment

- a. The language access committee (LAC) will be responsible for oversight and coordination of Language access policy and procedure and also ensuring compliance with World Hunger Ecumenical Arizona Task Force Inc's (WHEAT) language access policy.
- b. Language Access committee will annually review the following:
  1. Language Access survey: A yearly survey will be provided to staff and volunteers on the effectiveness of the policy when put into practice.
  2. Client satisfaction survey. Results of the client satisfaction survey will be reviewed. One of the questions relates to language access and a



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review of the feedback will be conducted.

c. The results of the review will determine if any changes need to be made.

### **Grievance Procedure**

In order to support the program participants, customers, clients, consumers, members of the public to access our services in their preferred language, World Hunger Ecumenical Arizona Task Force Inc (WHEAT) has implemented the following grievance procedure that is posted onsite:

It is against the law for World Hunger Ecumenical Arizona Task Force Inc (WHEAT) to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

### **To File a Complaint**

If you think that World Hunger Ecumenical Arizona Task Force Inc (WHEAT) has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint in person or by mail, fax or email with:

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

**E-mail:** [wheat@HungerHurts.org](mailto:wheat@HungerHurts.org) (fastest method to submit your complaint)

**Fax:** 602-955-5290

#### **U.S. Mail:**

World Hunger Ecumenical Arizona Task Force Inc (WHEAT)

Civil Rights and Civil Liberties Compliance

4000 N 7<sup>th</sup> St, Ste 118

Phoenix, AZ 85014

You can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit your complaint)

**Fax:** 202-401-4708

#### **U.S. Mail:**

U.S. Department of Homeland Security

Office for Civil Rights and Civil Liberties

Compliance Branch, Mail Stop #0190

2707 Martin Luther King, Jr. Ave., SE

Washington, D.C. 20528

**Appendix I Definitions**

<b>Limited English Proficient (LEP)</b>	Persons who are Limited English Proficient (LEP) shall be defined as people who do not speak English as their primary language or who are limited in their ability to read, write, speak, or understand English to an extent that effective communication in English, particularly with regard to complicated matters, is not possible. People who are LEP can include people who are deaf or hard of hearing. LEP designations are context-specific; an individual may possess sufficient English language skills to function in one setting, but may find these skills are insufficient in other situations.
<b>Preferred or primary language</b>	A client’s preferred or primary language is the language in which he or she is most comfortable speaking. A client able to speak English may have a primary language other than English. If it is not obvious, the preferred or primary language should be chosen by the client him/herself.
<b>Interpretation</b>	It is the process of orally rendering a spoken or signed communication from one language into another language.
<b>Translation</b>	It is converting written text from one language into written text in another language. ‘Translation’ is a written medium, which differs from interpretation.
<b>Sight translation</b>	This happens when a written document in one language has to be read aloud in another language so the content of the document can be easily understood by the client.
<b>Qualified interpreter or translator</b>	A qualified interpreter or translator is a trained professional who is a neutral third party with the requisite language skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology in order to effectively facilitate communication between two or more parties who do not share a common language.
<b>Bilingual</b>	It is the ability to use two (2) languages efficiently and fluently.
<b>Multilingual</b>	It is the ability to use three (3) or more languages efficiently and fluently.
<b>Vital Documents</b>	Vital Documents are any materials that are essential to an individual’s ability to access services provided by World Hunger Ecumenical Arizona Task Force Inc (WHEAT) or are required by law.
<b>Initial Point of Contact</b>	It is when an individual initiates contact with World Hunger Ecumenical Arizona Task Force Inc (WHEAT) to request services for the first time. Initial point of contact can happen either by phone, email or in person.
<b>Core Languages</b>	Core languages are – Spanish, Chinese, Tagalog, Arabic, Vietnamese, Hindi, Navajo, German, French, Somali



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**Top 10 NonEnglish CORE Languages Spoken in Metro Phoenix, Arizona**

#1. Spanish	#2. Chinese (incl. Mandarin, Cantonese)	#3. Tagalog (incl. Filipino)	#4. Arabic	#5. Vietnamese	#6. Hindi	#7. Navajo	#8. German	#9. French (incl. Cajun)	#10. Amharic, Somali, or other Afro-Asiatic languages
- 909,998 speakers (19.74% of population)	- 27,694 speakers (0.6% of population)	- 21,063 speakers (0.46% of population)	- 19,147 speakers (0.42% of population)	- 17,847 speakers (0.39% of population)	- 13,765 speakers (0.3% of population)	- 12,688 speakers (0.28% of population)	- 11,495 speakers (0.25% of population)	- 11,343 speakers (0.25% of population)	- 9,205 speakers (0.2% of population)
--- 619,701 speakers who also speak English very well	--- 14,066 speakers who also speak English very well	--- 16,136 speakers who also speak English very well	--- 12,049 speakers who also speak English very well	--- 7,697 speakers who also speak English very well	--- 11,528 speakers who also speak English very well	--- 10,483 speakers who also speak English very well	--- 10,593 speakers who also speak English very well	--- 9,470 speakers who also speak English very well	--- 5,858 speakers who also speak English very well
--- 290,297 speakers who speak English less than very well	--- 13,628 speakers who speak English less than very well	--- 4,927 speakers who speak English less than very well	--- 7,098 speakers who speak English less than very well	--- 10,150 speakers who speak English less than very well	--- 2,237 speakers who speak English less than very well	--- 2,205 speakers who speak English less than very well	--- 902 speakers who speak English less than very well	--- 1,873 speakers who speak English less than very well	--- 3,347 speakers who speak English less than very well