**Care Lodge Domestic Violence Shelter, Inc.**

Language Access Plan Effective Dates: November 2019-October 2021

**Section 1: Overview and Context**

1. **Connection to Mission**

*Care Lodge recognizes that providing meaningful language access is a critical function of ensuring safety and security for all survivors of domestic violence.*

1. **Language Access Needs:**

1. Care Lodge has identified 9 languages that are spoken in our community. The Languages are Spanish, Arabic, Gujarati, French, Vietnamese, Tagalog, Native-American, Choctaw, Pashtun, and Mandarin. The analysis of the general population and population served by our agency revealed that we need to build immediate capacity to provide meaningful access in each of these languages. Additional strategies for building relationships with and increasing our capacity to serve 4.6% speaking community members across nine counties will be outlined in this plan. This information was retrieved from the U.S. Census Bureau and from the Meridian and Lauderdale County public school district coordinators for federal programming.

**C. Purpose and Authority:**

1. The purpose of this plan is to ensure that Care Lodge Domestic Violence Shelter, Inc., provides meaningful access to agency information and services to survivors and other constituents limited in their English language proficiency. Care Lodge Domestic Violence Shelter, Inc., is committed to this plan as the appropriate response to meeting survivors’ needs. This plan is consistent with federal requirements. All agencies that receive federal financial assistance from the U.S. Department of Health and Human Services (HHS) must take adequate steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow them meaningful access to services, free of charge.

2. The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for agency personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to the success of our mission to work together to end abuse.

**D. Capacity-Building:**   
  
1. Care Lodge encounters clients and potential clients in a variety of ways including in-person direct services, telephonically, on the agency website, on social media, at community awareness events or education sessions, and via written materials such as flyers and brochures.

2. Care Lodge Domestic Violence Shelter offers the following services: 24-Hour Hotline, Emergency Shelter, Community Outreach and Education, Children’s Program, Non-Residential Services, Transitional Housing Assistance Program (TAP), Case Management, Court Advocacy and Support, Counseling – individual and group, and Domestic Abuse Protection Order Assistance (DAPO). We have identified several strategies for creating meaningful access to these services:

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| **Community Collaboration** | -Collaborative meetings with other community leaders with established services to LEP individuals |
| **Staff Development** | -Train all staff and volunteers on language access services  -Annual training on language access services, cultural competency, and ethics  -New employee training with LEP coordinator  -Hiring bilingual staff  -Additional training for bilingual staff to serve as certified interpreters  -Additional training for LEP coordinator |
| **Development of written material** | -Care Lodge will develop translations of vital documents in most prevalent languages spoken in the community including the Language Access Plan. -Care Lodge will develop flyers to be posted in entrance and intake areas notifying clients of language access services  -Each year, Care Lodge will seek to develop more translations of material outside of vital documents  -Care Lodge will create an option on the agency website for translation into most prevalent languages |
| **Development of other material** | -Care Lodge will produce a video tour of shelter in most prevalent languages. Video will include shelter guidelines and procedures. |

**Section 2: Policies**  
**A. General Policy Statement:**

1. Care Lodge Domestic Violence Shelter, Inc., will never turn anyone away because they do not speak English. Furthermore, Care Lodge Domestic Violence Shelter, Inc., will work to improve our capacity to provide meaningful access to individuals with limited English proficiency every year.

2. Care Lodge Domestic Violence Shelter, Inc., primary focus is to provide support and safety to victims of domestic violence through direct services. Therefore, Care Lodge Domestic Violence Shelter, Inc., will develop and secure sustainable language resources as needed in both oral and written form so that no victim will be denied access to information or services.

It is the policy of this agency to provide timely meaningful access for persons who are limited in the English language (LEP) to all agency programs and activities. All personnel shall provide free language assistance services to individuals with LEP whom they encounter or whenever a person requests language assistance service. All personnel will be informed of availability of language access services. Various employees including the community coordinator and LEP Coordinator will inform members of the public that language assistance services are available free of charge to persons who are LEP and that the agency will provide these services to them. Care Lodge will present information in a way that will accommodate the needs of persons with LEP.

3. Care Lodge Domestic Violence Shelter, Inc., recognizes that many low-income individuals in its service area have limited English proficiency. Care Lodge’s goal is, whenever practicable, to offer and provide the same high-quality service to all survivors, regardless of their language and communication abilities. The TAP case manager will be in charge of implementing Care Lodge’s policy for assisting survivors with limited English proficiency (“LEP Policy”).

**B. Interpreter Policy**1. Care Lodge Domestic Violence Shelter, Inc. is committed to ensuring quality services to all survivors and toward that we goal we have developed a plan to provide meaningful access to our services to survivors with LEP through bilingual advocates, local interpreters, or an interpreting agency either in person or over the phone.   
2. Care Lodge Domestic Violence Shelter, Inc., is committed to assuring clear, confidential, two-way communication with all survivors. As part of this commitment, Care Lodge Domestic Violence Shelter, Inc. will provide trained and competent interpreters whenever oral communication is needed. This service will be provided at no charge of the survivor.

3. When Care Lodge Domestic Violence Shelter, Inc. staff members who are working directly with a survivor are not fluent in the survivor’s language, Care Lodge will use the services of a local trained and tested interpreters. To follow best practices for ensuring safety for participant, interpreter must sign a confidentiality agreement. To the extent possible, the interpretation will be conducted in person but, if necessary, it may be conducted by phone. If no local interpreter service is available, Care Lodge will use Language Line. When a staff member uses language line, he/she will request an interpreter familiar with domestic violence terminology.   
  
4. Care Lodge Domestic Violence Shelter, Inc. will not use minor children to interpret, in order to ensure confidentiality of information, accurate communication, and to prevent re-traumatizing children.

Care Lodge will not use a client’s abuser to translate under any circumstances. Care Lodge will preferably not use an intimate partner, family member, or friend to interpret in order to ensure confidentiality of information and accurate communication unless client insists.

5. ‘Google Translate’ or any other unofficial interpreting tool should not be used unless every other possible interpreting resource is exhausted or unavailable.

**Section 3: Practices  
  
A. Language Assistance Measures**1. Care Lodge Domestic Violence Shelter, Inc. expects staff to familiarize themselves with the language access practices and resources outlined below. Staff should work directly with supervisors with questions, concerns, or to report difficulties in accessing the indicated resources.

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| **Point of Contact** | **Expectations of Staff** | **Tools and Resources** |
| Crisis Line | Identify language spoken. If advocate is not able to determine language spoken, he/she should immediately connect to Language Line Services or a bilingual advocate. Further procedures will be discussed in Language Access training. | Language Line, Bilingual advocates |
| Walk-In Clients | If client does not report language spoken, staff member should identify language spoken using I-Speak Cards. Staff should immediately connect with Language Line Services or Bilingual Advocate. Further procedures will be discussed in Language Access Training. | Community Service Building Staff members  I-Speak Cards |
| One-on-one participant meetings | Ensure that an interpreter is available. Interpreter will sign confidentiality agreement. Refer to interpreter policy for interpreter practices and ethical guidelines. | I-Speak Cards, In-Person Interpreter, Bilingual advocates, Language Line Services, Confidentiality Agreement |
| Ongoing Shelter Services | Notify participant of the availability of language services on an ongoing basis.  In-person interpreter should be present for weekly case management meetings or other primary meetings.  Language Line Services will be used for all other communication. Immediately provide access to the language line when requested.  All vital documents should be translated. Provide video tour of shelter in Spanish and most prevalent languages in the area | In-person interpreter, Bilingual advocates,  Language Line services, Language-specific shelter video, Translated materials. |
| Community-Based Services | Meet with other agencies and provide information about LEP plan and resources so that they may assist in informing LEP individuals of services available to people of all language | I Speak Cards, Translated flyers and brochures |
| Providing Referrals | Call the referral source and identify a point of contact with adequate language capacity. Connect the participant with the point of contact. Request and review the LAP for the referral source (courts, medical offices, other DV services, etc.) | Language Access Plans of other agencies |
| Community Events | Identify language spoken using I Speak Cards if needed.  Connect with language line to assess safety concerns, questions, and requests.  Bring Spanish written materials | I Speak Cards Language line services, Translated flyers and brochures |
| Support Groups | Arrange for an interpreter to be present at the support group that the LEP client signs up for in advance. Refer to interpreter policies for interpreter practices and ethical guidelines. | In-Person Interpreting |
| Written materials | Vital documents will be available in Spanish and the most prevalent languages in the nine-county service area.  Vital documents are to be reviewed with the support of an interpreter during intake | Additional translations can be arranged through selected translation agency or bilingual advocate. |

**B. Documentation**  
  
1. When Language Access services are provided, the staff facilitating the service will document each service in agency database system. When a call is received where language access services are requested or provided, staff member receiving call should document it on LEP call log. An LEP call log will be near every Care Lodge phone.

**C. Notification of Language Assistance Services**1. Posters notifying survivors with LEP of their language service rights will be developed and displayed in entrance area. These posters will contain a simple message—such as “Free Interpreter Services are available. Please ask for assistance.” This will be in English as well as the principle languages spoken in the service area. Flyers will also be developed and made available to be posted throughout the community. Staff will also have access to Language Access Plan and will have ‘I-Speak Cards.’

2. In all intake areas, Care Lodge Domestic Violence Shelter, Inc. will post and maintain clear and readable sign in the languages most prevalent in our community notifying survivors that people of all languages are served. Care Lodge intake staff will have ‘I-Speak Cards’ in the languages most prevalent in our community.   
  
3. Care Lodge will provide an option on the agency website to translate the information into one of the languages most prevalent in our community. There will also be a notice on the website that Care Lodge serves people of all languages and cultures.

4. Care Lodge will make efforts to notify the community via social media of language access services.

**Section 4: Staff Compliance  
  
A. Bilingual Staff Policy**  
  
1. Care Lodge Domestic Violence Shelter, Inc. has a preference for hiring bilingual/bicultural staff members whenever possible to work directly with individuals with limited English proficiency. This applies to staff proficient in a language that is prevalent in the agency service area. Bilingual/bicultural staff qualify for a salary differential based on language proficiency, cultural knowledge, and ability to effectively support individuals with limited English proficiency. Additionally, bilingual staff should not be used for work outside the agency if work conflicts with Care Lodge duties and responsibilities.   
  
2. Care Lodge Domestic Violence Shelter, Inc. shall consider second language proficiency, in a language commonly spoken by Care Lodge clients or potential clients, as a preferred quality when hiring new staff. Care Lodge employee recruiting materials will clearly state that second language proficiency will be viewed favorably in Care Lodge hiring decisions.

3. Staff that serve as interpreters for Care Lodge must be certified by an official language proficiency assessment if the language spoken is not his/her primary language. Staff person should receive regular training on proper interpretation techniques, ethics, and relevant terminology. Staff member must keep certification up to date as long as they serve as interpreters for the agency.

**B. Staff Training**1. Care Lodge Domestic Violence Shelter, Inc., will distribute a condensed LEP plan to all staff. An electronic copy of the complete LAP plan will be available so all staff will be knowledgeable of LEP policies and procedures. LEP Coordinator is appointed to monitor implementation of the plan and conduct staff training as needed.  
  
2. In order to establish meaningful access to information and services for survivors with LEP, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained on Care Lodge Domestic Violence Shelter, Inc., LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with survivors with LEP. Management staff will be included in this training, even if they do not interact regularly with survivors with LEP, to ensure that they fully understand the plan, so they can reinforce its importance and ensure its implementation by staff.  
  
3. LEP plan information will be incorporated into the employee handbook.  
  
4. LEP training will include information on the following topics:

Legal obligation to provide language assistance; LEP plan and procedures; Responding to LEP individuals; Obtaining interpreters (in-person and over-the-phone); Using and working with interpreters (in-person and over-the-phone); Translating procedures; and Documenting language access service requests.

5. Care Lodge Domestic Violence Shelter, Inc., will circulate this policy to all staff within 10 days after its adoption. Every year Care Lodge Domestic Violence Shelter, Inc., will circulate the revised policy to all staff after its adoption.

Within nine months of the adoption of this policy, Care Lodge Domestic Violence Shelter, Inc., will provide cultural competency training, including training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with survivors. All new staff members will receive cultural competency training within six months of the beginning of their employment with Care Lodge Domestic Violence Shelter, Inc., After their initial training, all staff members will receive refresher training in cultural competency and language access every year.

**D. Role of LEP Coordinator**1.The appointed LEP coordinator will organize and implement annual staff trainings.

2. The LEP Coordinator will collect monthly data of services provided for LEP individuals. Coordinator will compile data at annual evaluation for agency information.

3. The LEP Coordinator will oversee and coordinate community outreach and collaboration efforts.

4. The LEP Coordinator will conduct annual evaluation and revision of Language Access Plan.

**Section 4: Monitoring and Staff Responsible for Monitoring**

**A. Plan to Monitor Effectiveness:**

1. Care Lodge Domestic Violence Shelter, Inc., will conduct an annual evaluation of its LEP plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving survivors with LEP. The appointed staff will lead the evaluation with the assistance of other staff. The evaluation will include the following:

a. Assessment of the number of persons with LEP in our services area. This information will be retrieved from official statistical sources such as the Census, U.S. Department of Education, U.S. Department of Labor, State Agencies, Community Organizations, etc.

b. Assessment of the number and types of language requests during the past year: how many were met and with which strategies, how many were not met and why.

c. Assessment of whether survivors with LEP are satisfied with existing language assistance services and that the services are meeting their needs

d. Assessment of whether staff members understand the LEP plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and still accessible

2. Care Lodge Domestic Violence Shelter, Inc., intake personnel will record each person’s language of choice on the intake sheet. If the individual has limited English proficiency, the person’s language of choice will be clearly marked on the file. Care Lodge Domestic Violence Shelter, Inc., case management system will track the number of individuals that Care Lodge Domestic Violence Shelter, Inc., accepts and rejects by the person’s language of choice. This information, broken down by office and team will be considered as part of the annual LEP Policy review.

3. Care Lodge Domestic Violence Shelter, Inc., will monitor changing population levels and the language needs of individuals with LEP in the region. An annual review of this language access plan will coincide with the annual evaluation of the program. The LEP Coordinator will also keep a record of any language access services provided and will make this information available during the annual review process. In connection with updates to this Language Access Plan, Care Lodge Domestic Violence Shelter, Inc., may use some of the following tools to conduct further assessment:

a. Conduct surveys or focus groups

b. Develop an evaluation process to assess LEP service provision

c. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

**B. Grievance/Complaint Policy**Care Lodge Domestic Violence Shelter, Inc., recognizes that in any environment in which people interact regularly, conflicts, complaints, and concerns may arise. These issues may be between an individual and a staff member or another client. It may be regarding specific policies or rules. Care Lodge has a grievance procedure in place to ensure that clients have a process to formally submit a complaint or concern and to have an opportunity for resolution. All identifying information in this process will be kept strictly confidential by Care Lodge employees.

Every client has the right to submit a grievance if he/she has reason to believe that unfair or discriminatory treatment has been displayed including the unfair application of policies and procedures.

For individuals who are limited in English language proficiency, a grievance may be filed if the client believes he/she has not received proper languages access services including insufficient or ineffective interpretation services, vital documents not provided in client’s first language, etc.

Each grievance will be addressed by the Executive Director and/or a committee appointed by the Executive Director. Upon receipt of grievance, the Executive Director and/or committee will investigate and the client will receive a response within 10 working days. Presentation of a grievance will not compromise the availability of services or access to future services. A grievance form is attached to the end of this document.

**Section 5: Community Outreach and Collaboration**

1.Care Lodge Domestic Violence Shelter, Inc., will identify the primary sources through which survivors with LEP are referred to our services, and culturally-based organizations that serve individuals with LEP in our community. Care Lodge Domestic Violence Shelter, Inc., will work to develop collaborative relationships with these organizations to ensure more seamless access to services, accountability to our own language access policies, and greater access to survivors with LEP.

2. Care Lodge Domestic Violence Shelter, Inc., will share its LEP Policy and the documents and knowledge it develops in regard to LEP resources with the other services organizations in our area, namely Multi-County Community Service Agency, Wesley House Community Center, Meridian Housing Authority and any other not-for-profit organizations that requests the information.

3. Care Lodge Domestic Violence Shelter, Inc. will distribute informational flyers and brochures in various locations that LEP individuals are known to or are likely to frequent.

4. Care Lodge will post notifications of language access services on social networking sites as well as the agency website.

**Section 6: Implementation Calendar**

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| ***Implementation Timeline*** | ***Language Access Strategy*** | ***Person Responsible*** |
| *By November 30th, 2019* | * *Place notice of availability of interpreters at all entrances and intake areas.* * *Place “I-Speak Cards” near front counter at Community Services Building* * *Establish list of available interpreters* | *LEP Coordinator, Executive Director* |
| *By December 31st, 2019* | * *Publish revised LAP on agency website.* * *Distribute informational materials to local businesses and organizations that LEP individuals are likely to frequent.* * *Hold at least one collaborative meeting with a local organization serving LEP individuals.* * *Share LAP with at least one local agency.* | *LEP Coordinator, Community Coordinator* |
| *By January 31st, 2020* | * *Publish translated LAP on agency website.* * *Develop a video tour of shelter in Spanish.* * *Train all staff on language access plan, expectations, and resources available for providing language access including list of available interpreters* * *Target: 95% staff will be able to successfully implement language access strategies by* ***January 31st.*** | *LEP Coordinator* |
| *By February 30th, 2020* | * *Enhance intake protocol to screen for and document language access needs of survivors* | *LEP Coordinator, Executive Director* |

**Section 7: Definitions**

***Language access****: the rights of individuals with Limited English Proficiency (LEP) to receive meaningful access to federally funded state and Federal programs*

***Limited English Proficient (LEP):*** *refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English*

***Interpretation****: involves conveying information orally from one language to another (e.g. interpreting during an interview)*

***Translation****: involves conveying information in writing from one language to another (e.g. translating documents)*

***Vital documents*** *or information are those that are critical for accessing federally funded services or benefits or are documents required by law. For the purposes of Care Lodge Domestic Violence Shelter, Inc. services to survivors and other constituents the following are deemed vital documents (Examples may include):*

*1. Any informational domestic violence or related brochures generated by Care Lodge Domestic Violence Shelter, Inc., for use by survivors. Community education materials generated by Care Lodge Domestic Violence Shelter, Inc., for distribution*

*2. Crisis information or referral information to area resources*

*3. Intake forms, confidentiality waivers, etc.*

**G. Other Helpful Resources**

*A. Language Interpreting Services*

* *https://www.languageline.com/*
* *24/7 Voiance Client Support*
* *1-800-481-3289*
* *Support@voiance.com*
* *24-hr help line: 651.772.1611*

*B. Limited English Proficiency Informational Resources:*

* *Lep.gov*
* *https://casadeesperanza.org/*

**Participant Grievance Notification  
Language Access Services**  
Care Lodge strives to ensure appropriate services to each client including meaningful access to language services. Submitting a grievance not only opens the door to a prospective resolution to a problem, but it helps the staff at Care Lodge to improve the quality of services provided to clients.   
 **Concern/Problems:**   
Please explain: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Participant Signature Date

**Return this form to any staff member. Thank you for allowing us an opportunity to improve the quality of care we provide to our clients.   
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