

ADMINISTRATIVE RULES – CITY OF KNOXVILLE

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15.01

COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT

It is the policy of the City to comply with the Americans with Disabilities Act of 1990, the Americans with Disabilities Amendments Act of 2008, and related regulations (collectively, “ADA”).

(A) Department, Office, and Agency Functions Generally

Directors and heads of offices and agencies and the employees assigned to their departments, offices, and agencies are expected to be aware of the ADA and how it affects the operations of the department, office, or agency. This includes physical facilities in which the department, office, or agency conducts its business; all communications with the public, including public hearings and meetings, as well as written documents; services provided to the public; services and benefits provided to employees; and any other activities of any department, office, or agency affected by the provisions of the ADA.

Departments, offices, and agencies should always schedule meetings in physically accessible locations, and meeting announcements should be made in accessible formats whenever possible. In published notices regarding public meetings, the following statement should always appear:

If you are a person with a disability who requires an accommodation in order to attend a City of Knoxville public meeting, please contact the City’s ADA Coordinator, Stephanie Brewer Cook, at scCook@knoxvilletn.gov or (865) 215-2034 no less than 72 hours prior to the meeting you wish to attend.

Directors and heads of offices and agencies should train employees to ask for assistance from their director or office/agency head, the Department of Law, the Department of Human Resources, and/or the ADA Coordinator when ADA-related matters arise.

(B) ADA Coordinator

The Mayor designates an employee as the City’s ADA Coordinator. The ADA Coordinator shall liaise with and promptly notify the Department of Human Resources regarding all disability-related issues involving employees and applicants, including, without limitation, reasonable accommodation requests, grievances, and allegations of disability discrimination. The ADA Coordinator will provide technical assistance to directors and heads of offices and agencies upon their request regarding specific, ADA-related issues, including, without limitation, investigating and resolving ADA-related complaints, inquiries, and requests; provided, however, that the decisions of directors and heads of offices and agencies regarding such matters are final.

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(C) Reasonable Accommodations in Employment Generally

It is the policy of the City to provide reasonable accommodations to the known physical or mental limitations of otherwise qualified individuals with disabilities who are employees or applicants for employment to enable the individual to apply for a City position, perform the essential functions of a City position, or gain equal access to the benefits and privileges of City employment, unless the City determines that to do so would cause undue hardship or a direct threat.

The terms “reasonable accommodation,” “disability,” “qualified individual,” “essential functions,” “undue hardship,” and “direct threat,” among other terms, are defined by law. Consequently, each time a reasonable accommodation is requested, the City must engage in an interactive process with the individual in order to make a case-by-case determination as to whether the request is consistent with the law and, if so, what, if any, accommodation can be provided.

During this interactive process, if the basis for the request, the nature of the disability, and/or type of appropriate accommodation are not clear, the City may ask questions concerning the nature of the individual’s disability and the individual’s limitations. The individual must describe the problems posed by the workplace barrier or the barrier experienced during the hiring process that impedes either performing the essential functions of the individual’s position or gaining equal access to employment benefits and privileges. The City may ask the individual for medical documentation about their condition, limitations, and the need for reasonable accommodation. If the medical documentation does not clearly support the requested accommodation, supplemental medical information may be requested. The individual has a responsibility to provide the requested medical information. Failure to provide requested medical information may result in the denial of a reasonable accommodation request. Medical information obtained in connection with a reasonable accommodation request will be placed in a file separate from the personnel file or job application and kept confidential in accordance with applicable law.

If the City approves the request and there are multiple possible reasonable accommodations that would be effective, the City has the discretion to choose the accommodation that will be provided. The City is not obligated to provide the requestor’s preferred accommodation so long as the accommodation provided is effective.

Qualified individuals with a disability may request a reasonable accommodation at any time and may request additional reasonable accommodations if their circumstances change. The individual does not have to use any special words such as “reasonable accommodation” and does not have to put the request in writing. However, it is helpful to describe the request as specifically as possible. The more information provided to the City, the better the City will be able to respond to the request. Self-identifying as an individual with a disability is not considered a request for a reasonable accommodation.

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Reasonable accommodations may be implemented on a temporary or trial basis. In those circumstances, the City shall notify the individual in writing of the temporary nature of the accommodation, including the date the accommodation will be reassessed.

(D) Reasonable Accommodation Procedure for Employees

To request a reasonable accommodation, an employee, or their representative, must notify the employee's director or the head of their office or agency and request an adjustment to the work environment or an adjustment to how the work is completed related to the employee's disability.

Upon notification, the director or head shall provide the employee with an Employee Accommodation Request Form (or shall complete the form for the employee if the employee is unable to do so) and shall send the completed form to the Department of Human Resources, which shall forward the same to the ADA Coordinator. The director or head, in collaboration with the Department of Human Resources and the ADA Coordinator, shall then engage in the interactive process with the employee.

If an employee sends a completed Employee Accommodation Request Form to someone other than their director, office/agency head, or the Department of Human Resources, the recipient of the completed form shall forward the same to the Department of Human Resources.

Only the requesting employee's director or office/agency head has the authority to approve or deny the employee's request.

As soon as reasonably practical following receipt of sufficient documentation, the director or head shall respond in writing to the employee and inform them that an accommodation has been approved or denied. Copies of all correspondence shall be forwarded to the Department of Human Resources and the ADA Coordinator.

If the request is approved, the director or head will notify the employee of the expected date that the selected accommodation will be implemented and whether there are any temporary measures available that can assist the employee until the approved accommodation is implemented.

If the request is denied, the employee may appeal the denial to the Reasonable Accommodation Committee by written notice to the Director of Human Resources within 10 business days after receiving the denial. A copy of the original Employee Accommodation Request Form and a copy of the departmental, office, or agency denial must be submitted to the Director of Human Resources along with the request for appeal.

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(E) Reasonable Accommodation Procedure for Applicants

To request a reasonable accommodation, an applicant, or their representative, must notify the Department of Human Resources and request an adjustment to the hiring process related to the applicant's disability.

Upon notification, the Department of Human Resources shall provide the applicant with an Applicant Accommodation Request Form (or shall complete the form for the applicant if the applicant is unable to do so) and shall forward the completed form to the ADA Coordinator. If the applicant is applying for a classified position and the request involves testing considerations, the Applicant Accommodation Request Form shall also be forwarded to the Civil Service Merit Board through its Executive Secretary. The Department of Human Resources, in collaboration with the ADA Coordinator (and, if applicable, the Civil Service Merit Board's designee), shall then engage in the interactive process with the applicant.

Depending on the request, the official with the authority to approve or deny the applicant's request is as follows:

- If the applicant is either applying for an unclassified position or applying for a classified position and the request does not involve testing considerations, the Director of Human Resources, or their designee, has the authority to approve or deny the applicant's request; or
- If the applicant is applying for a classified position and their request involves testing considerations, the Civil Service Merit Board, or its designee, has the authority to approve or deny the applicant's request.

As soon as reasonably practical following receipt of sufficient documentation, the appropriate official or their designee shall respond in writing to the applicant and inform them that an accommodation has been approved or denied. Copies of all correspondence shall be forwarded to the Department of Human Resources and the ADA Coordinator.

If the request is approved, the official will notify the applicant of the expected date that the selected accommodation will be implemented and whether there are any temporary measures available that can assist the applicant until the approved accommodation is implemented.

If the request is denied, the applicant may appeal the denial to the Reasonable Accommodation Committee by written notice to the Director of Human Resources within 10 business days after receiving the denial. A copy of the original Applicant Accommodation Request Form and a copy of the official's denial must be submitted to the Director of Human Resources along with the request for appeal.

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(F) Reasonable Accommodation Committee

The Director of Human Resources may from time to time convene a Reasonable Accommodation Committee to address concerns related to reasonable accommodations in employment. The Reasonable Accommodation Committee shall be composed of the Director of Human Resources as chair and two additional directors or heads of offices and agencies, or their designees. The additional directors or heads shall be selected by the chair and shall not be the director or head of the department, office, or agency in which the reasonable accommodation at issue arose. If the reasonable accommodation arose from the Department of Human Resources, the Director of Law, or their designee, shall serve as chair. The ADA Coordinator and an attorney assigned by the Director of Law shall assist the Committee in an advisory capacity. The Committee may consult with technical advisors as necessary.

Within a reasonable time after receiving a request to appeal the denial of a request for a reasonable accommodation, the chair shall convene the Reasonable Accommodation Committee to review the denial. The Committee may affirm the denial or recommend that the denying official reverse their denial; however, the final decision will rest with the official. The requestor will be notified in writing of the Committee's recommendation and the final decision of the official regarding the accommodation request.

(G) ADA Grievance Procedure for Employees

Any complaint from an employee alleging discrimination by the City on the basis of a disability shall be filed in writing with the Director of Human Resources or their designee. If a complaint alleges disability discrimination against the Department of Human Resources, the complaint shall, instead, be filed in writing with the Director of Law or their designee. Alternative means of filing complaints will be made available for persons with disabilities upon request. All written complaints, appeals, and responses relating to alleged discrimination on the basis of a disability will be retained by the Department of Human Resources for at least 3 years.

(H) ADA Grievance Procedure for Non-Employees

If an employee receives an ADA-based complaint from a member of the general public, the employee should refer the complainant to the City of Knoxville's Grievance Procedure under the Americans with Disabilities Act (not included in these Administrative Rules), which governs such complaints and requires submission of a written complaint to the ADA Coordinator for investigation. Copies of all ADA-based complaints and all related correspondence from members of the general public shall be forwarded to the Department of Law. All written complaints, appeals, and responses relating to alleged discrimination on the basis of a disability will be retained by the Department of Human Resources for at least 3 years.

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15.02

NONDISCRIMINATION AND ANTI-HARASSMENT

The City is committed to providing a work environment that is free of all forms of discrimination, including any employment-related action by an employee that adversely affects an employee or applicant and that is based on any protected class set forth in [Knoxville City Code § 15-57](#) or any applicable federal or state law. The City's commitment to equal opportunity and nondiscrimination extends to all job applicants and employees and to all aspects of employment.

In keeping with this commitment, the City maintains a strict policy prohibiting discriminatory harassment based on a protected class as set forth in [Knoxville City Code § 15-57](#) or any applicable federal or state law. Discriminatory harassment is verbal or physical conduct that demeans or shows hostility or aversion toward an individual based upon that individual's protected class. All forms of discriminatory harassment are strictly prohibited.

Conduct that may, under certain circumstances, constitute discriminatory harassment can include, without limitation: making derogatory comments; making crude or offensive statements or remarks; making slurs or derogatory or degrading remarks or jokes; stereotyping; engaging in threatening acts; displaying indecent gestures, pictures, objects, cartoons, emojis, memes, gifs, posters, or other material; or making inappropriate physical contact. Such conduct is contrary to City policy and to the City's commitment to a work environment free from discrimination.

Discrimination and discriminatory harassment may occur via face-to-face interactions, telephone or other forms of remote communication, and through online and social media interactions. All forms of discrimination and discriminatory harassment are prohibited, regardless of medium.

Discrimination and discriminatory harassment do not include actions that are in accordance with established policies, procedures, regulations, rules, principles, or general standards of professional decorum including, without limitation:

- Acts or omission of acts based solely upon bona fide occupational qualifications under Equal Employment Opportunity Commission guidelines; and
- Reasonable requests or requirements by a supervisor that an employee improve their work quality or output; report to a job site on time; work a particular shift; comply with City or departmental policies, procedures, regulations, or rules; or any other appropriate work-related communication between supervisor and employee.

(A) Sexual Harassment

Sexual harassment is a form of discriminatory harassment. Unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature constitute sexual harassment when this conduct

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explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment.

Sexual harassment can occur in a variety of circumstances, including, but not limited to, the following:

- The victim does not have to be of a different sex or gender as the harasser, but the victim must have been subjected to harassment because of the victim's sex or gender;
- The harasser can be the victim's supervisor, an agent of the employer, a supervisor in another area, a coworker, or a non-employee;
- The victim does not have to be the person harassed but could be anyone affected by the offensive conduct;
- Unlawful sexual harassment may occur without economic injury to or adverse employment action taken against the victim;
- The harasser's conduct must be unwelcome; and
- Additional, specific examples of sexual harassment may include:
 - Physical: Assault, touching, leering, impeding movement;
 - Visual: Derogatory or sexually explicit photographs or drawings, written slurs, crude or offensive statements in any written form; or
 - Verbal: Slurs, derogatory sexual comments, requests for sexual favors, and invitations to engage in sexual activities, regardless of whether any such statement is based on genuine sexual interest or desire.

(B) Racial Harassment

Racial harassment is another form of prohibited discriminatory harassment. Examples of racial harassment include any conduct described in Section A of this rule that is based on race, color, national origin, and/or ethnic origin, specifically including derogatory remarks based on race, discriminatory behavior based on race, and any act that places an employee or applicant at a deliberate disadvantage based on race.

(C) Disability Discrimination

Discrimination on the basis of disability against any employee or applicant who is a qualified individual with a disability is prohibited.

Discrimination on the basis of disability includes, without limitation, the following:

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- Limiting, segregating, or classifying a job applicant or employee in a way that may adversely affect opportunities or status because of the applicant's real, perceived, or history of disability;
- Denying equal jobs or benefits because of a disability or the perception of a disability;
- Failing to make reasonable accommodations for known physical or mental disabilities of an otherwise qualified individual unless it can be shown that an accommodation would impose an undue hardship or create a direct threat to the individual or others, as set forth in more detail in Administrative Rule 15.01; and
- Using selection criteria that exclude persons with disabilities unless the criteria are job-related and consistent with business necessity.

(D) Discrimination and Harassment Reporting Procedure

Individuals are encouraged to promptly report any discrimination and discriminatory harassing conduct. Any employee who believes they have been the subject of discrimination or harassment based on a protected class set forth in [Knoxville City Code § 15-57](#) and/or federal or state law should submit a written complaint of the alleged act immediately to the Director of Human Resources or their designee at cityhr@knoxvilletn.gov, (865) 215-3100, or 400 Main St., Room 564. If a complaint alleges that an employee has been the subject of discrimination or harassment by the Director of Human Resources or their designee who is tasked with receiving discrimination and harassment complaints, the written report may be made to the Director of Law at cswanson@knoxvilletn.gov, (865) 215-2050, or 400 Main St., Room 699. If such a report is made by an employee to any other party, the party to whom the report has been made must notify the Director of Human Resources, or designee, or the Director of Law as soon as possible. Supervisors must report discrimination and discriminatory harassment as a condition of employment. Failure to report known discrimination or discriminatory harassment may result in disciplinary action.

Upon receipt of a report of alleged discrimination or discriminatory harassment, whether written or verbal, the Director of Human Resources, or designee, will investigate the allegation with support from a staff attorney in the Department of Law. If the alleged discrimination or harassment was by the Director of Human Resources or their designee who is tasked with receiving discrimination and harassment complaints, the Director of Law or designee will solely investigate the allegation. This investigation may include, without limitation, interviews of witnesses and an examination of relevant documents. If deemed appropriate by the Director of Human Resources or the Director of Law, any allegation of discrimination or harassment may be referred to the Knoxville Police Department ("KPD") to make an investigation of the allegation with support from a staff

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attorney from the Department of Law. At the conclusion of the investigation, a summary report of findings will be submitted to the Director of Law, the director or office/agency head of the accused employee, and to the Director of Human Resources (if the investigation was undertaken by KPD or the Department of Law).

There will be no retaliation against an employee who brings a good faith complaint of discriminatory harassment or against any employee who provides good faith testimony or evidence during an investigation.

After the investigation of the alleged discrimination or discriminatory harassment has been completed, and where the investigative findings support the allegation of discrimination or discriminatory harassment, appropriate disciplinary action will be taken, up to and including termination. During any investigation, the City may also take any temporary action necessary to prevent further discrimination or discriminatory harassment until the investigation is completed and permanent action can be taken. Further, pursuant to [Knoxville City Code § 15-54](#), the Director of Human Resources, or designee, may, upon request of any director or office/agency head, assist in resolving or effectuating investigative findings by conciliation or such other remedial action.

Reporting a false complaint of discriminatory harassment is a serious act. If it is found that an employee reporting discrimination or discriminatory harassment has knowingly or recklessly made false allegations, the City may take appropriate remedial action and/or disciplinary action up to and including termination.

15.03 **COMPLIANCE WITH THE IMMIGRATION REFORM AND CONTROL ACT**

The Immigration Reform and Control Act requires that the City verify the identity and employment eligibility of all new employees. All new employees must complete all required forms and submit appropriate documentation within 3 days of initial employment.

In accordance with federal law, the City shall not discriminate against any individual (other than an undocumented noncitizen) in hiring, discharging, promoting, or other personnel actions because of that individual's national origin or, in the case of a citizen or intending citizen, because of their citizenship status. However, state law requires that all police officers must be United States citizens.

15.04 **BREASTFEEDING SUPPORT AND PROMOTION**

In compliance with Tenn. Code Ann. § 50-1-305, the City supports employees who are breastfeeding their children, whether by birth, adoption, or surrogacy, by providing opportunities and a space to express breast milk.

An employee can take up to two paid breaks per day (the two breaks described in Administrative Rule 5.03) to express breast milk. Directors and heads of

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offices and agencies may not refuse an employee's reasonable request to take such breaks when the purpose is to express breast milk for a breastfeeding child. Employees using these breaks to express breast milk will not be required to remain in the general work area during the breaks.

Employees expressing milk during their work shift may, but are not required to, use either an employee lactation room or other designated spaces in City facilities. If a lactation room is not available at the employee's worksite, the supervisor will help the employee identify a place to express milk, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public.

Employee lactation rooms and other designated spaces shall be used solely for an employee to express breast milk for, or to breastfeed, a nursing child. No other use of these spaces is permitted. Employees may store properly labeled, expressed milk in any refrigerator used for food storage.

15.05

COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 ("Title VI") prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

The Director of Human Resources serves as the City's Title VI Coordinator.

Any employee who believes they have been the subject of discrimination pursuant to conduct prohibited by Title VI should submit a written complaint of the alleged act immediately to the Director of Human Resources or their designee at cityhr@knoxvilletn.gov, (865) 215-3100, or 400 Main St., Room 564. If a complaint alleges that an employee has been the subject of Title VI discrimination by an employee within the Department of Human Resources, the written report may be made to the Director of Law at cswanson@knoxvilletn.gov, (865) 215-2050, or 400 Main St., Room 699. If such a report is made by an employee to any other party, the party to whom the report has been made must notify the Director of Human Resources, or designee, or the Director of Law as soon as possible. Upon receipt of a report of alleged Title VI discrimination, the Title VI Coordinator will investigate the allegation pursuant to investigation procedures developed in coordination with the Tennessee Human Rights Commission.

There will be no retaliation against an employee who brings a good faith complaint of Title VI discrimination or against any employee who provides good faith testimony or evidence during a Title VI investigation.

After a Title VI investigation has been completed, where the investigative findings support an allegation of Title VI discrimination, appropriate disciplinary action will be taken, up to and including termination. During any Title VI investigation, the City may also take any temporary action necessary to prevent further Title VI

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discrimination until the investigation is completed and permanent action can be taken.

Reporting a false complaint of Title VI discrimination is a serious act. If it is found that an employee reporting Title VI discrimination knowingly or recklessly made false allegations, the City may take appropriate remedial action and/or disciplinary action up to and including termination.

15.06

LIMITED ENGLISH PROFICIENCY

In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, the City will take reasonable steps to ensure that persons with Limited English Proficiency (“LEP”) have meaningful access and an equal opportunity to participate in all services, activities, and programs. LEP individuals are those who are unable to speak, read, write, or understand the English language at a level that permits them to interact effectively with the City’s service providers. The policy of the City is to ensure meaningful communication with persons that experience LEP and their authorized representatives. This policy also provides for the communication of information contained in vital documents, meaning any document containing information that is critical for accessing services, activities, and programs, e.g., letters or notices requiring the response of an LEP individual and documents that inform LEP individuals of free language assistance. All interpreters, translators, and other aids needed to comply with this rule shall be provided without cost to the person being served.

This rule governs the City, employee functions and actions, and subrecipients of federal funds through the City. This rule does not govern organizations that make use of City space for non-City events.

Language assistance will be provided through the 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 rule 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. The City will conduct a regular review of the language access needs of its service population and will update and monitor the implementation of this rule, as necessary.

PROCEDURES:

(A) Written Notice of Language Access Rights

Language access statements will inform LEP individuals of the following:

1. Information about available LEP services, including their ability to utilize qualified interpreter services at no cost to them;

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2. Basic instructions on accessing services, activities, and programs, including directions to appropriate City offices; and
3. Their ability to file a grievance about the language access services provided to them.

Language access statements will be distributed in the major LEP languages appropriate for the City. Distribution decisions (i.e., what documents will contain language-access statements and where they will be located) will be based on the importance or urgency of the service and the volume of public contact. Distribution will occur through the following methods:

1. Posting of signs in lobbies and waiting areas;
2. Posting of signs on bulletin boards located in areas of public access; and
3. Statements in brochures, booklets, outreach, recruitment information, and other materials that are routinely disseminated to the public.

Departments, offices, and agencies will post signs containing language access statements within their workspaces.

(B) Identifying LEP Persons and their Languages

The City will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card ("I speak" cards) 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. These records may be used to determine the level of LEP services and make and evaluate changes to LEP services.

(C) Obtaining a Qualified Interpreter

Qualified interpreters are persons with a demonstrated proficiency in English and another language, a demonstrated knowledge in both languages of relevant specialized terms or concepts, and documentation of completion of training on the skills and ethics of interpretation and awareness of relevant cultural issues. Qualified interpreters will be required to comply with the City's confidentiality policies and the ethics provision in the Knoxville City Code when interpreting or translating.

The City's Title VI Coordinator is responsible for maintaining an accurate and current list showing the name, language, phone number, and hours of availability of bilingual staff, which is provided on the Department of Human Resources's intranet website. Departments, offices, and agencies may use this list to contact the appropriate bilingual staff member to interpret if an employee who speaks the needed language is available and is qualified to interpret. Departments, offices,

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and agencies may also obtain an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Fluent Language Line has agreed to provide qualified interpreter services, which are available 24/7. The agency's telephone number is 1-855-869-7238.

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 in writing after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department. 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, and the LEP person may not use the family member or friend as an interpreter.

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

Public meeting notices will include a statement explaining that interpreters will be provided upon request if requested at least 5 business days before the meeting.

(D) Providing Written Translations

When translation of vital documents is needed, each department, office, and agency in the City will submit documents for translation into frequently encountered languages to the Title VI Coordinator. Original documents being submitted for translation will be in final, approved form.

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

All restrictions placed upon interpreters and their interpretations detailed in Section (C) of this rule equally apply to written translators and their translations.

(E) Monitoring Language Needs and Implementation

On an ongoing basis, the City will assess changes in demographics, types of services, or other needs that may require reevaluation of this rule and its procedures. In addition, the City 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.

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(F) Employee Training

All employees will receive LEP training. Employees should know their obligations to provide LEP individuals with meaningful access to City services, programs, and activities. The more frequent the contact with LEP individuals, the greater the need for in-depth training. Employees with little or no contact with LEP individuals must be aware of this rule and their department's, office's, or agency's specific LEP policy, if any ("SP"). Employees in management positions, even if they do not interact regularly with LEP individuals, must be fully aware of and understand this rule and their respective SP so that they can reinforce the importance and ensure the implementation of the policies.

LEP training on a City-wide level will be planned and carried out by the Title VI Coordinator. The Title VI Coordinator will conduct "train-the-trainer" sessions for all of the LEP department, office, or agency liaisons on an annual basis and by request. LEP liaisons will be expected to lead the training efforts for their respective departments, offices, agencies, and employees.

Each department, office, or agency is responsible for the LEP training of all of its employees. Each department, office, or agency will develop its training program based on this rule and their SP. The training will be led by the designated LEP liaison.

At a minimum, the City will ensure that:

- All employees know about this rule;
- All employees who are in public contact positions will be trained to work effectively with in-person and telephone interpreters and translators; and
- The City will provide training, including a copy of this rule, as part of the City's orientation for new employees.