

# **Free Library of Philadelphia** **LANGUAGE ACCESS PLAN & PROTOCOL**

## **PURPOSE AND AUTHORITY**

- A. In Cooperation with the Mayor's Office, the **Free Library of Philadelphia** is committed to compliance with Title VI of the Civil Rights Act of 1964, 2 C.S. § 561 et seq. (Act 172 of 2006), and the Philadelphia Home Rule Charter § 8-600 and § A-200, in ensuring meaningful access to City services and programs for individuals with limited English Proficiency ("LEP")."
- B. The purpose of this document is to establish an effective plan and protocol for **The Free Library of Philadelphia** personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following this plan and protocol is essential to the success of our mission to **advance literacy, guide learning, and inspire curiosity.**

## **GENERAL POLICY**

- A. The Free Library of Philadelphia recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of **The Free Library** to ensure meaningful access to LEP individuals. The Free Library of Philadelphia adopts the following policy to ensure that LEP individuals can gain equal access to **The Free Library's** services and communicate effectively. This Plan applies to all Free Library departments and neighborhood libraries.
- B. It is the City's policy to grant access to services or programs to every person even when the person has a limited ability to speak, understand, read or write English. The Free Library intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Free Library seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. The Free Library bears the responsibility for providing appropriate services. Staff at the initial point of contact have the duty to identify language needs. Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged. Minor children are prohibited from acting as interpreters. No staff may suggest or require that an LEP customer provide an interpreter in order to receive services

D. The preferred method of serving LEP persons is by:

- (1) Using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.
- (2) Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
- (3) Staff should seek assistance from professional telephonic interpreters or pilot translation app (being piloted in 10 neighborhood libraries).
- (4) Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

## **LANGUAGE ACCESS COORDINATOR AND COMMITTEE**

**Language Access Coordinator  
Joseph Benford, Deputy Director of Customer Engagement  
Free Library of Philadelphia  
Central Library  
1901 Vine Street, Room 117  
Phone: 215-686-5389  
[benfordj@freelibrary.org](mailto:benfordj@freelibrary.org)**

**New Americans Committee for The Free Library  
Chair: Tiffany Nardella**

## **DIRECT CONTACT WITH LEP INDIVIDUALS**

The Free Library of Philadelphia has several points of contact with the public:

LEP individuals visit neighborhood libraries, attend library programs, call the library and, and interact with library staff at community events throughout the city. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation or voice-to-voice translation via Google Voice Translation App.

### **INTERPRETATION**

Interpretation is the immediate oral rendering of the source language into the target language.

#### **Services Provided**

- To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include: Available, trained, competent bilingual staff may be used for in-person or telephone interpreting, telephonic interpretation (Language Services Associates), or voice-to-voice translation via pilot translation app (offered as a pilot program in 10 neighborhood libraries).

#### **Protocols**

- To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide interpretation, at no cost to the resident, for LEP persons pursuant to the following procedures:
- An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or when a request for an interpreter is made either orally, in writing or by pointing to a language card, the employee shall determine whether bi-lingual staff is available who speaks the language being requested.

#### **Procedures**

- When bilingual staff is not available, the employee shall access contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:

##### **Telephonic Interpretation –**

The Free Library can get an over-the-phone interpreter by calling the following vendor: Language Services Associates. This service is available 24/7.

To submit a request, call 866-592-XXXX and provide the following information when greeted by a coordinator:

- When prompted, please enter your five-digit access code: XXXXX
- Press 1 for Spanish, 2 Mandarin, 3 Cantonese, 4 Arabic, or 9 for all other languages.
- For Spanish, Mandarin, Cantonese and Arabic, the interpreted session may now begin.
- For all other languages, when greeted by a coordinator, request the language needed or ask for assistance in identifying the language.
- Hold momentarily while your interpreter is connected. Once on the line, you will be notified and provided with the interpreter's ID number.
- Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in the first person.  
Example: "What is your name?" NOT "Ask her what her name is."
- Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.

### Future Plans

- **Use interpretation, and ensure that the staff and public know about the availability of these services..** The telephonic interpretation service is available in over 170 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff on using telephonic interpretation services.
- **Analyze success of piloted translation app. The Free Library of Philadelphia is piloting a translation app (voice to voice translation) in 10 of our neighborhood libraries where language needs are the highest. 10 tablets have been purchased and loaded with this app.** The Free Library will continue to inform the public about these resources through social media, visible multilingual signs and will train staff on use of this app.

## TRANSLATION

### Services Provided

- To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide translations, at no cost, for LEP individuals. This includes translations of the Free Library's Website via Google Translate, library card applications offered in 15 different languages, program flyers upon request, and various collection signs.

## **Protocols for Document Translation**

- Many vital written documents have been translated into the following languages: Spanish, Chinese, Vietnamese, Khmer, Korean, Portuguese, French, and Russian.
- Documents to be translated include the following and will also include additional languages (Arabic, Hindi, and more)
  - Library Card Applications
  - Library Card Policies
  - New American Resource Brochure
  - Various program flyers (case-by-case at request of library staff)
  - Standards of acceptable behavior
  - Community Surveys (as they present themselves)

### **Procedure for Submitting a document for translation:**

- There is no official policy in place regarding translation at the Free Library. To request that a document be translated, please forward to Tiffany Nardella, Language Access Coordinator, at [nardellat@freelibrary.org](mailto:nardellat@freelibrary.org)

## **Signage**

- As part of the 21st Century Library program, we are creating a sign policy. Currently the majority of our signs are in English but also utilize symbols for bathrooms. In libraries where there are world language collections, the signs are in the language of the collection. We have also created a Welcome Sign in 15 languages that will be visible in the entrance area of all of our 21st Century Libraries.

## **Website**

- Access to our library card applications and New American brochures available in multiple languages may be found on our website. Our website is constantly evolving with the information needs of our community as well as based on the calendar year.

## **Future Plans**

- The Free Library will continue to translate vital documents into Spanish, Chinese, Vietnamese, Russian, Arabic, and other languages. We will work with our External Affairs Department and Graphics department to create a policy and procedure working with a professional translation organization. We will also create a procedure for neighborhood library staff to request translation of program flyers into the other languages based on community demographics.

- Resources include translation vendors that perform quality-assurance reviews. The agency is working on a budget for translation services in order to encourage broad translation of public materials to ensure that translations are done by a professional linguist.

The New Americans Committee and External Affairs Department of the Free Library will continue to make these resources widely known throughout the agency and will continue to enforce agency protocols that support high-quality translations—for example, ensuring that translations are not done in-house (except by the agency’s designated translator) or by machine.

## **BILINGUAL STAFF**

### **FREE LIBRARY STAFF - LANGUAGE SKILLS**

This list identifies staff that can deliver services directly in a second language, or can serve as interpreters for other employees.

**Please see attached appendix for list of bilingual staff.**

**Future Plans** - What is the plan for building in-house language capacity? Consider the following three factors when answering this section:

**Hiring** - Include the language skills as a “desirable” qualification in job announcements.

If bilingual or multilingual skills are included in the job description, a candidate’s language proficiency should be assessed as part of the selection process.

#### **Language sensitive assignments.**

Subject to any mandatory legal constraints, department staff should consider the options available to assign or configure employees in order to best communicate with LEP individuals served by or in contact with the department without imposing unfair burdens on bilingual staff.

## **D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS**

This section lays out what the department’s training policy and schedule will be to ensure that all staff are familiar and aware with the Department’s language access policy, plan, and the protocols for language services.

The Free Library’s Language Access Plan & Protocol will be provided to all staff at the Free Library, posted on the intranet, and provided as a hard copy to all Free Library staff members at hiring.

The Free Library will distribute the LEP plan to all staff and will have a current electronic

copy available so all staff will be knowledgeable of LEP policies and procedures.

All public service staff will receive annual LEP training, or training upon employment, and then annually through the Free Library's Cluster Meetings.

LEP training will include information on the following topics:

- Legal obligation to provide language assistance;
- LEP plan and protocols;
- Identifying and responding appropriately to LEP individuals;
- Obtaining interpreters (over-the-phone);
- Using and working with interpreters (over-the-phone);
- Translating procedures;
- Documenting language requests; and
- Using or not using bilingual staff as in-house interpreters and access to these staff members.

The Free Library will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, The Free Library will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, The Free Library will provide training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with LEP individuals. All new staff members will receive training within six months of the beginning of their employment with The Free Library. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

In order to establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public and those who will serve as in-house interpreters will be trained on The Free Library's LEP policy, plan and protocols. Training will ensure that staff members are effectively able to work in person and/or by telephone with LEP individuals. Management staff will be included in this training, even if they do not interact regularly with LEP individuals, to ensure that they fully understand the policy, plan, and protocols so they can reinforce their importance and ensure implementation.

Orientation- New staff training will be provided on the Free Library's Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

## **E. ADMINISTRATIVE HEARINGS**

The Free Library does not conduct administrative hearings.

## **NOTICE OF THE RIGHT TO LANGUAGE ACCESS**

Posters notifying LEP individuals of their right to language displayed in areas of public contact.

Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.

In all areas of public contact and on its website, the Free Library of Philadelphia will post and maintain clear and readable signs in the languages most prevalent in the City notifying LEP individuals that free translation and interpretation services are available to them.

## **DATA COLLECTION AND ANNUAL REPORT**

The following information will be required to be monitored and collected by departments and will be collected via quarterly reports by the Office of Immigrant Affairs:

- (1) Type of Language Services Provided to LEP Customers
- (2) Number of Documents Translated
- (3) Language Services Expenditures

Additionally, Language Access Coordinators will be required to report quarterly on the following:

- (1) Number of bilingual staff
- (2) Number of staff trained in Language Access/Cultural Competency

The Office of Immigrant Affairs will supply all departments with a Language Access Data Collection sheet to assist in the reporting of this data

### **Annual Report/Evaluation**

The Free Library's New American Committee will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of department goals and identify new goals or strategies for serving LEP residents. The designated staff will lead the evaluation with the assistance of the Director and Deputy Director. The evaluation will include the following:

- a. Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
- b. Assessment of data collected about the LEP's primary language.
- c. Assessment of the number and types of language requests during the past

- year.
  - d. Assessment of whether staff members understand the Language Access Plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and accessible.
  - e. Assessment of complaint information; and
  - f. Assessment of soliciting feedback from LEP individuals and community groups.
- 2.) The Free Library will add each person's language of choice into their patron record upon visits to ensure that the information can be used by staff and tracked by the language access coordinator.
- a. If the individual is Limited English Proficient, the person's language of choice will be noted in their SIRS record for future visits.
- 3.) Evaluation results and recommended changes will be shared by OIA's Language Access Coordinator and incorporated into **annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600**. The Language Access Coordinator will also keep records of any language access services provided and will make this information available during the annual review process. In connection with updates to the Language Access Plan, the Office of Immigrant Affairs may use some of the following tools to conduct further assessment:
- a. Request comments and feedback from visitors that have received language services

## **LANGUAGE ACCESS COMPLAINT PROCEDURE**

You may file a formal Language Access grievance with the Office of Immigrant Affairs if you believe you have been wrongly denied the benefits of this Language Access Plan. You must file your complaint within 6 months of the alleged denial. To file a formal complaint, you must fill out a Language Access Grievance Form and submit the form in person, by mail or e-mail to:

Office of Immigrant Affairs  
Orlando Almonte  
Language Access Program Manager  
1401 JFK Blvd, Suite 1430  
Philadelphia, PA 19102  
E-Mail: [orlando.almonte@phila.gov](mailto:orlando.almonte@phila.gov)

The form will also be available on OIA's website once the website is completed.

Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations. To do so, please complete a Public Accommodations Discrimination Intake Form and submit in person or

by mail to:

Philadelphia Commission on  
Human Relations The Curtis  
Center  
601 Walnut Street., Suite 300 South  
Philadelphia, PA 19106

To access the form and for more information, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

## **TIMELINE FOR IMPLEMENTATION**

### Implementation Plan Logistics

Major milestones in our plan will include:

- 1.) Continuing to broadly translate and interpret as needed
- 2.) Updating agency language access tools and resources to all offices
- 3.) Exploring additional training opportunities for staff

Timeline:

#### 2016

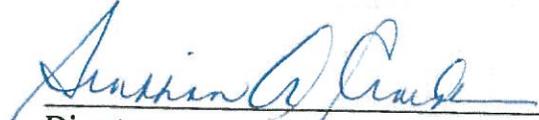
- 1.) Implement language access protocol, utilizing telephonic and in-person interpretation as needed
- 2.) Have current vital documents translated and publicly available
- 3.) Assess if other documents should be translated
- 4.) Provide public notice of available language services through use of posters and flyers available in our main offices
- 5.) Review any Language Access comments or complaints and determine possible changes

#### 2017

- 1.) Have all employees trained in Language Access/Cultural Competency
- 2.) Work outlined in 2016 will continue
- 3.) Review Language Access Report and assess data and use to make further changes to the Language Access Plan
- 4.) Agency will adjust and update this plan as needed

**SIGNATURE PAGE**

  
Language Access Coordinator

  
Director

**BILINGUAL STAFF**

**May 2016**

**LANGUAGE**

**Albanian**

**American Sign  
Language**

**Arabic**

**Chinese (Cantonese)**

**Chinese (Mandarin)**

**Croatian**

**Farsi**

**French**

**German**

**Gujrathi**

**Haitian Creole**

**Hebrew**

**Hindi**

**Hungarian**

**Italian**

**Japanese**

**Khmer**

**Korean**

**Malayalam**

**Marathi**

**Polish**

**Portuguese**

**Punjabi**

**Romanian**

**Russian**

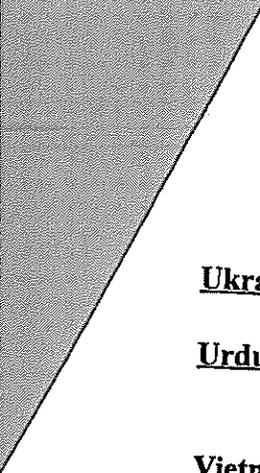
**Setswana**

**Slovak**

**Spanish**

**Tagalog**

**Tamil**



**Ukrainian**

**Urdu**

**Vietnamese**

**Wolof**

**Yiddish**



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