

CITY OF PHILADELPHIA
OFFICE OF THE INSPECTOR GENERAL
LANGUAGE ACCESS PLAN

2016

TABLE OF CONTENTS

PURPOSE AND AUTHORITY	3
GENERAL POLICY.....	4
LANGUAGE ACCESS COORDINATOR	5
DIRECT CONTACT WITH LEP INDIVIDUALS.....	6
LANGUAGE ACCESS SERVICES AND PROTOCOLS.....	7
RIGHT TO LANGUAGE ACCESS NOTICE	12
DATA COLLECTION AND ANNUAL REPORT	13
LANGUAGE ACCESS COMPLAINT PROCEDURES	14
IMPLEMENTATION TIMELINE.....	15
SIGNATURE PAGE	16

OFFICE OF THE INSPECTOR GENERAL LANGUAGE ACCESS PLAN | 2016

PURPOSE AND AUTHORITY

The purpose of this document is to establish an effective plan and protocol for the Office of the Inspector General to follow when providing services to, or interacting with, individuals who have Limited English Proficiency. Following this plan and protocol is essential to the success of the Office of the Inspector General's overall mission and we are dedicated to a culture of inclusion and accessibility for all.

In cooperation with the Mayor's Office, the Office of the Inspector General 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.

OFFICE OF THE INSPECTOR GENERAL

LANGUAGE ACCESS PLAN | 2016

POLICY

It is the City of Philadelphia's policy to grant access to services and programs to every person, even if the person has a limited ability to speak, understand, read, or write English. The Office of the Inspector General (OIG) recognizes that the population eligible for its services includes individuals who have Limited English Proficiency (LEP). As a result, it is the policy of the OIG to ensure meaningful access to LEP individuals. The OIG adopts the following policy to ensure that LEP individuals can gain equal access to OIG services and communicate effectively. This plan applies to all OIG employees.

The OIG intends to take reasonable steps to provide LEP individuals with meaningful access to services and programs. The OIG seeks to reduce barriers to services by increasing its capacity to deliver services and benefits to people in their primary language.

The OIG, and not the LEP customer, bears the following responsibilities:

1. Provide language appropriate services. Staff may not suggest or require an LEP customer provide an interpreter in order to receive services.
2. Identify and record any language needs at the initial point of contact.

The preferred method of serving LEP customers is by:

1. Using competent bilingual staff, able to provide services directly to the customer in his/her primary language, without the need of an interpreter, is the preferred method of serving LEP customers. Staff should use this method before others.
2. Available, trained, competent bilingual staff may be used for in-person or telephonic interpretation to support other staff.
3. Staff should seek assistance from professional in-person or telephonic interpreters when bilingual staff cannot meet language needs.
4. Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer. The OIG recognizes that certain circumstances may require specialized interpretation and translation services, even when bilingual staff is available (for example, situations concerning HIPPA, confidentiality, or any other communication that may have legal implications).
5. The use of informal interpreters such as family members or friends of the person seeking service, or other customers must be discouraged.
6. Minor children (under 18) are prohibited from acting as interpreters.

OFFICE OF THE INSPECTOR GENERAL
LANGUAGE ACCESS PLAN | 2016

LANGUAGE ACCESS COORDINATOR

Ximena Flores
OIG Investigator
OIG Language Access Coordinator
Office of the Inspector General
601 Walnut Street, Suite 300 East
Philadelphia, PA 19106
215-685-6063

Amy Kurland
Inspector General

DIRECT CONTACT WITH LEP INDIVIDUALS

The Office of the Inspector General has several points of contact with the public. The following outlines how communications with LEP's must be handled at each point of contact.

A. Online Complaints

The OIG online web portal will be translated for LEP individuals to file complaints electronically. Since Spanish is the OIG's most frequently and almost exclusively used second language, the online complaint portal will be translated into Spanish.

B. Telephone Complaints

The OIG receives many telephone complaints, in these instances, if there is no bilingual staff available to interpret, staff will be directed to take the customer's information and call back at a time when an appropriate staff member or interpreter is available.

C. In-person Complaints

Several times a week, in-person complaints are made. If the complainant is an LEP individual, and there is no bilingual staff available to interpret, staff will use telephonic interpretation services.

D. Interviews

The OIG routinely interviews individuals, both as witnesses and targets. If language needs are anticipated, the OIG will utilize in person interpretation in the appropriate language and schedule them as necessary.

LANGUAGE ACCESS SERVICES

A. INTERPRETATION

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

1. Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the OIG will provide an interpreter at no cost to the LEP individual.

2. Protocols

The OIG will provide an interpreter at no cost to the LEP individual pursuant to the following procedures:

- a. If an individual appears to have difficulty communicating what s/he needs, and/or
- b. If a request for interpreter is made orally, in writing or by pointing to a language card, the employee shall determine whether bilingual staff in the office is available who speaks the language requested.
- c. If bilingual staff is unavailable (during *a.* or *b.* instances), the employee shall contact a telephonic interpreter to provide interpretation. In emergencies, always use telephonic interpreters.

Telephonic Interpretation

OIG can receive telephonic interpretation by calling 'Language Services Associates' who are available 24/7.

To submit a request, call  and provide the following information when greeted by a coordinator: Department name, division, account cod XXXX.

- d. When an LEP individual requests in-person interpretation or a future meeting is scheduled, and bilingual staff is unavailable, in-person interpreters may be used.

In-Person Interpretation

You can request an in-person interpreter by contacting Nationalities Service Center. Please give +48 hours' notice whenever possible.

To submit a request online, visit www.nscphila.org/language-access-services/request-services. Fill out service request form and be sure to select interpretation. Enter any interpretation appointment information available. To cancel an in-person interpretation request, call NSC directly, at least one full business day in advance of the scheduled time.

3. Future Plans

Use telephonic interpretation, and ensure that the public knows about the availability of these services. OIG will make telephonic interpretation services available in its main office through Language Services Associates. The Telephonic interpretation service is available in over 170 languages. The office will continue to inform the public about these resources through visible Multilanguage signs and will train all of its staff on using telephonic interpretation services protocols.

If need increases for telephonic interpretation on the complaint hotline, processes for telephonic interpretation will be reviewed and updated.



OFFICE OF THE INSPECTOR GENERAL

LANGUAGE ACCESS PLAN | 2016

C. OIG BILINGUAL STAFF

1. Bilingual Staff

French
Spanish

2. Future Plans

Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Language service needs will be addressed by including language skills as a "desirable" qualification in job and internship announcements.

D. TRAINING PROTOCOL

The OIG's Language Access Plan will be incorporated into the staff handbook. An electronic copy will be made available to all OIG staff. The OIG will circulate this Language Access Plan and related protocols to all staff within ten (10) days of adoption. Every two (2) years, the OIG will circulate a revised policy. All staff will receive refresher training in cultural competency and language access every three (3) years. The OIG will work with the OIA to begin planning cultural competency trainings.

1. Timeline

In order to establish meaningful access to information and services for LEP individuals, all OIG staff will be trained on the OIG's LEP policy and protocols. Training will ensure that staff members are effectively able to work in-person and/or by telephone with LEP individuals. The OIG will have a training within three (3) months of adopting this policy. This training will be mandatory for all OIG staff and will include information on the following topics:

- Cultural competency;
- Legal obligation to provide language assistance;
- LEP plan and protocols;
- Identifying and responding appropriately to LEP individuals;
- Documenting LEP individuals' language preferences;
- Obtaining interpreters (in-person and over-the-phone);
- Using and working with interpreters (in-person and over-the-phone);
- Translating procedures;
- Documenting language requests; and
- Using bilingual staff as in-house interpreters.

B. TRANSLATION

Translation is the rendering of a written text from the source language into the target language

1. Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, the OIG will provide translations, at no cost, to LEP individuals. This includes translations of vital documents, signage and portions of our website.

2. Translations Needed

a. Documents

- OIG Mission Statement
- Message from the Inspector General
- Contact information
- Voluntary Consent Form
- Laws and Regulations: Executive Order 07-14

b. Website

- Investigative Wrongdoing Page
- Contract Compliance Page
- Report Wrongdoing Page and “Reporting Anonymously” box

c. Office Signs

- Right to Access Notice

3. Procedures for Submitting a Document for Translation

- a. Email the editable document to the Office of Immigrant Affairs – Language Access Program Manager, Orlando Almonte (Orlando.Almonte@phila.gov).
- b. OIG Language Access Coordinator will submit the translation request for quote.
- c. Quote must be authorized by the Inspector General, or Deputy Inspector General.
- d. Quote must be signed and returned to the OIG.
- e. OIA will email you the translated documents.

4. Future Plans

The OIG will determine future plans after collecting data to illustrate the demand and need of translation.

OFFICE OF THE INSPECTOR GENERAL
LANGUAGE ACCESS PLAN | 2016

2. New Staff Training

Training for new OIG staff will include this Language Access Plan. A copy of this Language Access Plan will also be included in the onboarding process at hiring.

3. OIG Staff Interpreter Training

Training for bilingual staff to be used as in-house interpreters will be provided with the assistance of the Office of Immigrant Affairs.

OFFICE OF THE INSPECTOR GENERAL
LANGUAGE ACCESS PLAN | 2016

RIGHT TO LANGUAGE ACCESS NOTICE

- A.** Posters notifying LEP individuals of their right to language services will be developed and displayed in the main entrance. These posters will inform LEP individuals that free interpreter services are available upon request. Posters will be in English as well as the principle languages encountered at the OIG.
- B.** Department notices and flyers will also provide notice of the availability of language services and instructions on how to request language assistance.
- C.** Notices that LEP individuals can obtain translated copies of important documents will be made available on all relevant documents. The Office of Immigrant Affairs will support the OIG in creating these tag lines.
- D.** Bilingual OIG staff will have access to City of Philadelphia Language Access Cards. Language Access Cards state that the carrier speaks a second language.
- E.** The OIG, both online and in all areas of public contact, will post and maintain clear and readable signs in the most common languages identified, notifying LEP individuals that free interpretation and translation services are available upon request.

DATA COLLECTION & ANNUAL REPORT

A. Data Collection Process

The Language Access Coordinator is responsible for collecting data on LEP individuals as well as interpretation and translation services (See B., below). The Office of Immigrant Affairs will provide a report template for all pertinent information. All OIG staff will report LEP individual interactions as well as interpretation and translation service needs with the Language Access Coordinator via email as they arise.

B. Data

The following information will be monitored and collected:

1. Number of LEP encounters (by language);
2. Type of Language Services provided to LEP customers;
3. Number of translated documents;
4. Language Services expenditures;
5. Number of bilingual staff;
6. Number of staff trained in Language Access and Cultural Competency; and
7. Complaint and feedback information on OIG Language Access.

C. Data Review Evaluation

A review and evaluation of all data collected will be performed quarterly and reported to the Office of Immigrant Affairs. An assessment of the data will help evaluate the overall effectiveness and strategy of the OIG's Language Access Plan.

D. Annual Report

Evaluation results and recommended changes will be incorporated into an annual report, which is required under the Philadelphia Home Rule Charter § 8-600. In connection with updates to the OIG Language Access Plan, the Office of Immigrant Affairs may conduct further assessment.

LANGUAGE ACCESS COMPLAINT PROCEDURES

The following notices must be posted with all Language Access information, in English and the most five (5) commonly used OIG languages.

Office of Immigrant Affairs Grievance

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 the OIG Language Access Plan.

You must file your complaint within six (6) months of the purported denial. To file a formal complaint, fill and submit a Language Access Grievance Form, in person, by mail or by e-mail to:

Office of Immigrant Affairs
Orlando Almonte
Language Access Program Manager
City Hall, Room 110
Philadelphia, PA 19107
EMAIL: Orlando.Almonte@phila.gov
ONLINE: A complaint form will also be available on the OIA website.

Philadelphia Commission on Human Relations Grievance

Any person, regardless of their LEP status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations.

To file a legal complaint with the Commission on Human Relations, 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
ONLINE: www.phila.gov/humanrelations

OFFICE OF THE INSPECTOR GENERAL
LANGUAGE ACCESS PLAN | 2016

IMPLEMENTATION TIMELINE

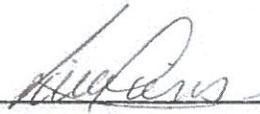
A. Translations

- Document Translations will be performed by March 2017.
- Website Translations will be performed by April 2017.

B. Training

- OIG employee training on Language Access Plan and protocols will be conducted by July 2017.

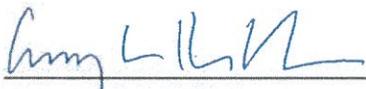
SIGNATURES



Ximena Flores
OIG Language Access Coordinator

12/1/2016

Date



Amy Kurland, Esq.
Inspector General

12/1/2016

Date