

**Philadelphia Department of Public Health
Division of Disease Control
Language Access Plan & Protocol**

September 2016



Department of
Public Health
CITY OF PHILADELPHIA
LIFE • LIBERTY • AND YOU™

Table of Contents

I. Purpose and Authority	3
II. General Policy	3
III. Language Access Coordinato	4
A. Language Access Coordi	4
B. Director	4
IV. Direct Contact with LEP Individuals	4
A. Meetings/Trainings/Information Sessions	4
B. Disease Control Activities	5
V. Language Access Plan and Protocols	5
A. Interpretation	5
B. Translation	7
C. Bilingual Staff	9
D. Training Staff on Policy, Plan, and Protocols	11
E. Administrative Hearings	11
VI. Notice to the Right to Language Access	11
A. Posters	11
B. Notices and Flyers	11
C. Documents	11
D. Language Access Cards	12
E. Public Areas	12
VII. Data Collection and Annual Report	12
A. Data Collection	12
B. Evaluation	12
C. Tracking	12
VIII. Language Access Complaint Process	12
IX. Time for Implementation	13
A. Implementation Plan Logistics	13
B. Timeline	13
X. Signature Page	14

I. Purpose and Authority

- A. In Cooperation with the Mayor's Office, the **Philadelphia Department of Public Health Division of Disease Control (PDPH DDC)** 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 **PDPH DDC** 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 prevent, control and report on diseases and conditions that are contagious and/or affect the public's health. We also help people to prepare for public health emergencies, and educate the community about how to stay safe and healthy.

II. General Policy

- A. PDPH DDC recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of PDPH DDC to ensure meaningful access to LEP individuals. PDPH DDC adopts the following policy to ensure that LEP individuals can gain equal access to PDPH DDC' services and communicate effectively. This Plan applies to all PDPH DDC offices and satellite offices.
- 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. PDPH DDC intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. PDPH DDC seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. PDPH DDC, rather than the LEP customer, bears the following responsibilities:
 - 1. Providing language appropriate services.
 - 2. Staff members at the initial point of contact have the specific duty to identify and record language needs.
 - 3. Use of informal interpreters such as family, friends of the person seeking services, or other customers must be discouraged.
 - 4. Minor children are prohibited from acting as interpreters.
 - 5. 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 in-person or telephonic interpreters when staff cannot meet language needs.
 4. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff members with bilingual abilities are available (for example, situations concerning HIPAA, confidentiality or anything that may have a legal implication). Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

III. Language Access Coordinator or Committee

A. Language Access Coordinator

Chad Thomas, MPH
Public Health Communications Outreach Coordinator
Bioterrorism & Public Health Preparedness Program
Philadelphia Department of Public Health, Division of Disease Control (PDPH DDC)
500 South Broad Street, 2nd Floor
(215) 685-6459
chad.thomas@phila.gov

B. Director

Caroline C. Johnson, MD
Acting Deputy Health Commissioner & Director, Division of Disease Control
Philadelphia Department of Public Health

IV. Direct Contact with LEP Individuals

PDPH DDC has several points of contact with the public. Examples are listed below:

A. Meetings/Trainings/Information Sessions

At times PDPH DDC will hold meetings, trainings, or information sessions with the general public or targeted populations. In these instances, if there is no bilingual staff available to provide the session in a needed language or interpret for individuals, staff uses pre-arranged interpretation services.

B. Disease Control Activities

The majority of Programs within the PDPH DDC conduct regular disease control activities such as phone calls, home visits or influenza clinics. In these instances, if there is no bilingual staff available to interact with individuals in their needed

language or interpret for them, staff uses pre-arranged interpretation services.

V. Language Access Plan and Protocols

In late 2015, the PDPH DDC developed **2016 Language Access Services: Appendix 3 of Community Engagement Plan (CEP) for Preparedness, Recovery and Response**. A copy of the plan was emailed to Miriam Enriquez at the Office of Immigrant Services on February 2nd, 2016. The plan can be found on the DDC shared drive at S:\DDC\PHP\Planning\Community Response\Plans\Community Engagement Plan (CEP) for Preparedness, Response and Recovery\Appendices\Appendix 3 Language Access Services.

A. Interpretation

1. 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 an interpreter, at no cost to the resident, for LEP individuals. Services offered include telephonic interpretation and in person interpretation.

2. 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 an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

- a. An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
- b. When a request for an interpreter is made either 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 being requested.

3. Procedures

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

FROM: PDPH DDC plan, 2016 Language Access Services: Appendix 3

Updated: February 9th, 2016 with information from Miriam Enriquez, Director, Philadelphia Office of Immigrant Affairs

Over-the-phone Interpretation – Interpretalk (provided by Language Services Associates)

You can make arrangements for an over-the-phone interpreter by contacting Language Services Associates. This service is available 24/7.

- To submit a request, call [redacted] choose Option #2 with the following information:
 - Department name, division, account code 1292

In-person Interpretation (provided by Language Services Associates)

You can make arrangements for an in-person interpreter by contacting Language Services Associates. This service is available 24/7. Please give more than 48 hours' notice whenever possible. In an emergency, call right away.

- To submit a request OVER THE PHONE, call [redacted] with the following information:
 - Department name, division, account code 1292
 - Name of employee submitting request
 - Language of interpretation
 - Date and time of interpretation session
 - Length of the interpretation session (i.e. 1 hour)
 - Location of the interpretation session
 - Type of appointment (i.e. community meeting, police interrogation, social worker visit)
 - Any special instructions or details about the appointment
- To submit a request via the internet, please follow these steps:
 - Log onto the LSA website at: [redacted]
 - Click Client Login - INTERPRETRAC
 - Sign in using the following information:
 - Username: [redacted]
 - Password: [redacted]
 - Click on the ON-LOCATION INTERPRETING link
 - Click CREATE NEW REQUEST
 - Complete the form and click CONTINUE
 - Confirm that all information is correct, and click SUBMIT REQUEST

4. Future Plans

a. **Use telephonic interpretation, and ensure that the public knows about the availability of these services.**

PDPH DDC makes 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 social media, visible multilingual signs and will train all of its staff members on using telephonic interpretation services.

b. **Grow in-person interpretation services.**

PDPH can provide for in-person interpretation for scheduled meetings and events using the above protocols if given enough notice. PDPH DDC will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff members on requesting in-person interpretation services.

B. Translation

1. 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 vital documents, signage and portions of our website.

2. Protocols for Vital Document Translation

Individual PDPH DDC Programs develop translated documents for targeted populations affected by their initiatives on an as needed or requested basis. For example, Zika materials have been translated into Spanish and other languages, as travelers to Latino-Caribbean countries, are most at risk for the disease.

3. Procedures

When translations cannot be made and proofread by bilingual PDPH DDC employees, the following process will be used as outlined below:

FROM: PDPH DDC plan, *2016 Language Access Services: Appendix 3*

Updated: February 9th, 2016 with information from Miriam Enriquez, Director, Philadelphia Office of Immigrant Affairs

Before submitting a document for translation, please review your document and ensure the following:

- The content has not already been translated in another document
- The document and translation procedure have been approved by your supervisor
- The document is in a format that can be *edited* (e.g. Microsoft Word, Publisher, InDesign, etc.)
- Terms you do not want translated are highlighted, i.e. the name of your unit, program or street, etc.
- You have accounted for the literacy level of the document

Non-Emergency Translation Procedures

Please submit non-emergency requests for document translation and proofreading to the Office of Immigrant Affairs by following the steps below:

- Email the document to Miriam Enriquez at _____
- Call Miriam Enriquez at _____ to follow-up on the request.
- Miriam will submit the translation request to GenevaWorldwide to obtain a quote.
- Miriam will email you a quote, time estimate (usu. 1-2 business days), and authorization form to be signed and emailed back to her.
- Miriam will email you the translated documents.

Emergency Translation Procedures

Miriam Enriquez has authorized Chad Thomas, Dr. Steven Alles, and Dr. Caroline Johnson from the Division of Disease Control to send translation requests directly to the translation company, GenevaWorldwide. Should you have an emergency translation request, you should submit your request to the Division of Disease Control following the steps below:

- Email the document to one of the designated Division of Disease Control contacts:
 - Chad Thomas at _____
 - Dr. Steven Alles at _____
 - Dr. Caroline Johnson at _____
- Call the designated contact to ensure receipt of the document
 - During normal business hours call one of the following:

1. Chad Thomas at
 2. Dr. Steven Alles at
 3. Dr. Caroline Johnson at
 - o After normal business hours, call _____ and ask to speak to the Division of Disease Control on-call personnel
- The designated Division of Disease Control contacts will email the translation requests to the following three contacts, and will follow-up with a phone call to Yasmín Menon, *Dept. Manager, Translation and Transcription*:
 - o _____
 - Translation Department
 - Phone: _____
 - After-hours cell phone (Yasmin Menon) _____
 - GenevaWorldwide will begin the translation process immediately, and will email a translation procedure completion time estimate within the hour, followed by a quote

Once the translation services have been completed, GenevaWorldwide will bill the Office of Immigrant Affairs who will forward the invoice to PDPH. Tara Mohr _____ from PDPH will contact the requesting Division for the index code.

4. Signage

Because most Division of Disease Control offices are not open to the general public, signage is not available in various languages. Visitors to the Division of Disease Control are escorted by a PDPH DDC employee to the office or location where they have an appointment. The only exception to this rule is patients presenting at the 1400 Lombard St STD clinic, who can request needed languages when they approach the front desk. Signage for Point-of-Dispensing sites has been translated into the top languages spoken in Philadelphia.

5. Website

- a. The PDPH DDC website contains information about the entire range of Division Programs and activities. Examples of materials currently available on the PDPH DDC website in multiple languages include:
 - 1) *PDPH Health Bulletin*
 - 2) *Everybody Ready 3.0: Health and Emergency Planning Handbook for Individuals, Families and Caregivers*
- b. PDPH DDC will translate additional select documents and make them available through the website, newsletter, and/or community engagement meetings and other events. PDPH DDC will periodically review Division webpages with the goal of improving its accessibility to LEP persons. This includes identifying the most important information to be translated and the best means for disseminating translations to LEP communities.
- c. Tag lines will be included in the website that explain that LEP individuals can obtain a translation of documents or that interpretation is available in our

office.

6. Future Plans

Language Access Goal: Write public materials in plain English, and translate extensively. Bilingual PDPH DDC staff members will continue to edit all public materials for plain language and to extensively translate important agency documents and health education materials. Documents will continue to be translated and proofread by native speakers within the PDPH DDC whenever possible, and sent out for translation by external vendors when needed. The Division will set aside monies for translation of public materials, even if individual Program budgets are limited. Division outreach staff members will continue to make these resources widely known throughout the agency and will continue to enforce agency protocols that support high-quality translations.

C. Bilingual Staff

1. Current Staff

The list below includes the languages spoken as self-identified by PDPH DDC staff.
LAST UPDATED: 04/20/16

American Sign Language

Cantonese

Cebuano

Creole

Finnish

French

German

Hindi

Igbo

Japanese

Malayalam

Mandarin

Russian

Spanish

Swedish

Tagalog

Vietnamese

2. Future Plans

a. Hiring

PDPH DDC may address language skill needs in any one of three ways:

- 1) Create new positions for and hire full-time or part-time employees within departments using standard hiring processes.
- 2) Reclassify an existing position. If the need for interpretation and translation services is high and is expected to be long-term,

departments may redefine a position to include the required language skill(s) and request Human Resources to study the work and create the position. This request must be made before filling a vacant position.

3) Include the language skills as a “desirable” qualification in job announcements.

b. Staff interpreters

PDPH DDC does not currently have a program for certifying interpreters within the staff, and will seek guidance on this from the Office of Immigrant Affairs.

c. Language-sensitive assignments

Department staff will 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

1. Training

DDC Language Access Plan & Protocol will be posted online, and provided as an electronic copy to all DDC staff members at hiring.

All staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.

LEP training will include information on the following topics:

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

DDC will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, DDC will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, XX 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 LEP individuals. All new staff members will receive cultural competency training within a year of the beginning of their employment. 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 DDC 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 DDC Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

2. Future Plans

PDPH DDC will seek guidance from the Office of Immigrant Affairs in developing appropriate trainings and certification procedures.

E. Administrative Hearings

1. Protocol

For tuberculosis-related court hearings, the Law Department arranges for an interpreter if the need has been confirmed by Tuberculosis Program staff. These arrangements are made prior to the court date. In the event that the interpreter fails to arrive for the hearing, Interpretalk is used. For other types of events, PDPH DDC staff members follow procedures as outlined above in this plan.

2. Future Plans

PDPH DDC will continue to develop interpreter protocol for administrative hearings and look to the Office of Immigrant Affairs for guidance.

VI. Notice to the Right to Language Access

A. Posters

Posters notifying LEP individuals of their right to language services will be developed and displayed in areas of public contact. These posters will contain a simple message, such as "Free Interpreter services are available. Please ask for assistance," and will be in English as well as the principle languages spoken in the service area.

B. Notices and Flyers

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

C. Documents

Tag lines will be included in or attached to a document. Taglines in languages other than English can be used on documents written in English that describe individuals with LEP

can obtain translation of the document or an interpreter to read or explain the document.

D. Language Access Cards

Staff will also have access to the City of Philadelphia Language Access Cards. These are cards with a detachable wallet-size card that say in both English and a second language "I speak (language). I need assistance in (language)."

E. Public Areas

In all areas of public contact and on its website, PDPH DDC will develop, 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.

VII. Data Collection and Annual Report

A. Data Collection

PDPH DDC will collect the following information and provide it to the Office of Immigrant Affairs upon request:

1. Number of LEP Encounters (By Language)
2. Type of Language Services Provided to LEP Customers
3. Number of Documents Translated
4. Language Services Expenditures
5. Number of bilingual staff
6. Number of staff members trained in Language Access/Cultural Competency

B. Evaluation

PDPH DDC 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 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.

Evaluation results and recommended changes will be shared by DDC 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 DDC may use some of the following tools to conduct further assessment:

- a. Request comments and feedback from visitors that have received language services.
- b. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

C. Tracking

PDPH DDC intake personnel will record each person's language of choice in electronic format to ensure that the information can be used by staff and tracked by the Language Access Coordinator.

VIII. Language Access Complaint Process

Individuals may file a formal Language Access grievance with the Office of Immigrant Affairs if they believe they have been wrongly denied the benefits of this Language Access Plan. They must file their complaint within 6 months of the alleged denial. To file a formal complaint, individuals 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*
City Hall, Room 110
Philadelphia, PA 19107
Email: 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, they must 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.

IX. Time for Implementation

A. Implementation Plan Logistics

Major milestones in our plan will include:

1. Continuing to broadly translate and interpret
2. Updating agency language access tools and resources
3. Exploring additional training opportunities

B. Timeline

2016

1. The Language Access Coordinator will meet with front-line PDPH DDC staff to discuss language access challenges, best practices and methods for tracking language access data by program/site, and to brainstorm ideas for new or updated language access resources these staff might need.
2. The Language Access Coordinator will update the agency's internal protocols for written translations and in-person interpretations, respectively.
3. The agency will work closely with City Hall and will communicate with other City agencies about best practices, tools that can be shared and challenges.
4. The agency will continue to broadly translate materials and provide on-site interpretation as needed, and to track these activities.

2017

1. The Language Access Coordinator will create a Language Access and will distribute the updated toolkit to staff in the agency's public programs.
2. The Language Access Coordinator will explore ways to track PDPH DDC staff members who speak other languages and who are willing to help review translations and provide interpretation services. This will include updating the agency's internal Volunteer Language Database. The agency will look to the Office of Immigrant Affairs for training and certification resources.

X. Signature Page

Chad Thomas, MPH Date
Public Health Communications Outreach Coordinator
Language Access Coordinator Name and Title
Philadelphia Department of Public Health (PDPH)
Division of Disease Control

Caroline C. Johnson, MD Date
Acting Deputy Health Commissioner
& Director, Division of Disease Control
Philadelphia Department of Public Health

X. Signature Page



1/31/2017

Chad Thomas, MPH
Public Health Communications Outreach Coordinator
Language Access Coordinator Name and Title
Philadelphia Department of Public Health (PDPH)
Division of Disease Control

Date



1/31/2017

Caroline C. Johnson, MD
Acting Deputy Health Commissioner
& Director, Division of Disease Control
Philadelphia Department of Public Health

Date