

DEPARTMENT of LICENSES AND INSPECTIONS

LANGUAGE ACCESS PLAN & PROTOCOL

2016

1. PURPOSE AND AUTHORITY

- A. In Cooperation with the Mayor's Office, the Department of Licenses and Inspections (L+I) 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 Department of Licenses and Inspections 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 make Philadelphia the Nation's leader in building safety.

2. GENERAL POLICY

- A. The Department of Licenses and Inspections recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Department of Licenses and Inspections to ensure meaningful access to LEP individuals. The Department of Licenses and Inspections adopts the following policy to ensure that LEP individuals can gain equal access to L+I services and communicate effectively. This Plan applies to all L+I 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. L+I intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. L+I seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. Responsibility Statements:
The department, rather than the LEP customer, bears the responsibility for providing language appropriate services.

Staff at the initial point of contact have the specific duty to identify and record 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. Preferred Method of Service:

The preferred method of serving LEP customers is by using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.

Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.

L+I staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs. L+I recognizes that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.

Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.

3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE

Language Access Coordinator

Kirk McClarren

Administrative Services Director

City of Philadelphia, Department of Licenses and Inspections (L+I)

Municipal Services Building, Room 1130

Direct: (215) 686-2407

kirk.mcclarren@phila.gov

Commissioner of Licenses and Inspections

David J. Perri, P.E.

The Department of Licenses and Inspections has also formed a Language Access Committee, which is comprised of key Supervisory/Managerial Personnel. The Committee will assist with implementation enforcement of this Language Access Plan as well as implementation of the Plan for all remove (district) L+I offices throughout the City of Philadelphia.

4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Department of Licenses and Inspections has numerous points of contact with the public:

(1) *District Offices* – L+I has district offices throughout the City for customers to obtain information and assistance regarding licenses, permits, code violations and related matters. L&I inspectors are deployed from these field sites to serve the neighborhoods in their respective district boundaries. L&I Offices are currently located as follows:

DISTRICT OFFICES:

**BUILDING DIVISION
DIVISION**

OPERATIONS / CODE ENFORCEMENT

EAST DISTRICT
Rising Sun Ave & Benner St.
6100 Rising Sun Ave—1st Floor
Philadelphia, PA 19111

EAST DISTRICT
Rising Sun Ave & Benner St.
6100 Rising Sun Ave—2nd Floor
Philadelphia, PA 19111

WEST DISTRICT
43rd & Market Streets
Philadelphia, PA 19104

WEST DISTRICT
1401 JFK Blvd, 11th Floor
Philadelphia, PA 19102

CENTRAL DISTRICT
990 Spring Garden Street
7th Floor
Philadelphia, PA 19123

CENTRAL DISTRICT
11th & Wharton
1300 S. 11th Street—2nd Floor
Philadelphia, PA 19147

SOUTH DISTRICT
11th & Wharton
1300 S. 11th Street—2nd Floor
Philadelphia, PA 19147

SOUTH DISTRICT
11th & Wharton
1300 S. 11th Street—2nd Floor
Philadelphia, PA 19147

NORTH DISTRICT
217 E. Rittenhouse St.
Philadelphia, PA 19144

NORTH DISTRICT
4000 North American Street
Philadelphia, PA 19140

(2) *Specialized Offices* – L+I also has the following offices that provide specialized L+I services (non-inspectional)

CLEAN & SEAL
4000 N. American St.
Philadelphia, PA

BOARDS ADMINISTRATION
*(L&I Review Board, Board of
Building Standards and
Zoning Board of Adjustment)*
1401 JFK Blvd
11th Floor
Philadelphia, PA 19102

CODE VIOLATION RESOLUTION
1401 JFK Blvd
11th Floor
Philadelphia, PA 19102

(3) *Citywide Offices* – The following offices provide citywide L+I services:

L+I MSB SERVICE COUNTERS for Permit Intake, License Issuance and Customer Service functions.
1401 JFK Blvd, Concourse Level, Philadelphia, PA 19102

L+I CONTRACTUAL SERVICES UNIT – for matters related to imminently dangerous properties.
1401 JFK Blvd, 11th floor, Philadelphia, PA 19102

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

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

When a request for an interpreter is made either orally, in writing or by pointing to a language card, the L+I employee shall determine whether bi-lingual 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, the process to do so is outlined below:

Telephonic Interpretation –
Language Line Services
1-866-874-3972

(2) When an LEP person requests in-person interpretation for a future meeting, telephonic or in-person interpretation may be used, the process for requesting an in-person interpretation is below:

In-Person Interpretation –

You can request an in-person interpreter by contacting the following vendor: Nationalities Service Center. This service is available 24/7, but please give more than 48 hours' notice whenever possible. In an emergency, use a telephonic interpreter.

Cancelation of In- Person Interpreter

If a request for an in-person interpreter will not be needed, call Nationalities Service Center to cancel the request at least a full business day in advance of the scheduled time (if possible.)

4.) Future Plans-

L+I will continue to utilize telephonic interpretation and will ensure that the public knows about the availability of this service. Beginning July 1, 2016, L+I will begin surveying all Department offices to ensure the locations display appropriate signage to communicate the availability of interpretation services. The Department will also begin procuring visible multilingual signage in all locations. In

addition, refresher training will also be conducted for L+I employees on using telephonic interpretation services.

Grow in-person interpretation services. The Department of Licenses and Inspections can offer in-person interpretation for scheduled meetings, hearings and events as needed through Nationalities Service Center if given enough notice. L+I will begin reminding the public about these resources on its website and through visible multilingual signs and will train staff 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, L+I will continue to provide translations, at no cost, for LEP individuals. This will include translations of vital documents, signage and portions of our website.

2.) Document Translation

Beginning July 1, 2016, L+I will be embarking on a comprehensive review of all critical documents, forms, notices and other communications. Critical documents will be identified for translation into multiple languages. Once this process is complete, L+I will communicate this translation effort to ensure that all customers are aware.

L+I currently has the following documents translated:

- Partners for Good Housing (Spanish)
- L+I User Guide (Spanish)
- Electronic Commercial Licensing & Permit Services Enterprise (eCLIPSE) brochures (Spanish)
- Notice of Demolition to Adjoining and Adjacent Properties (Spanish)

L+I is currently working with the Office of Innovation and Technology (OIT) to identify resources available to begin translation of key online L+I content. This content includes not only L+I's website www.phila.gov/li, but also L+I's new eCLIPSE software system that will be offering online ability to apply for licenses and permits.

3.) Procedure for Submitting a document for translation:

Procedure for Submitting a document for translation:

- a. Email the editable document to L+I's Language Access Coordinator, Kirk McClarren, L+I Administrative Services Director at: _____
- b. L+I's Language Access Coordinator will then contact the City's Office of Immigrant Affairs to facilitate the translation request.

NOTE: 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. MS Word, Publisher, InDesign, etc.)

- Terms you do not want translated are highlighted, i.e. the name of your unit, program or street.
- The document is written so it can be understood by readers with lower literacy skills.

4.) Signage

The Department of Licenses and Inspections does not currently have multi-lingual signage. Effective July 1, 2016 with the implementation of this Language Access Plan, L+I, through its designated Language Access Coordinator and Committee, will begin surveying all Departmental offices to determine specific signage needs. L+I will identify all necessary languages in which signs are required and promptly procure signage for all locations.

5.) Website

As noted earlier in this Plan document, L+I is currently working with OIT to review all key online content to be translated. The Department's eCLIPSE software will be providing online license and permit submission capabilities for the first time. Accordingly, this IT effort will be exploring the technology necessary to translate non-english customer submissions into alternate languages that can be reviewed and processed by L+I staff. L+I will take reasonable steps to translate public online content through this IT project. As this project is in its infancy, timelines are not yet available but will be communicated to the public as they are known.

C. BILINGUAL STAFF

1.) Current Staff

This list identifies the languages spoken by L+I staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

Spanish	Malayalam	Hindi
Urdu	Nepali	German
Tamil	Italian	

2.) Future Plans-

- Hiring** - L+I will be continuing its effort to hire employees with specific language skills. Positions that interact with the public such as Customer Service Representatives and Inspectors have been identified for this hiring plan. For L+I's first effort in FY17, L+I has partnered with the City's Office of Human Resources (OHR) to announce the civil service examination for L+I Code Enforcement Inspector in the General and Bi-lingual specialties. L+I will be working with OHR to test in all languages that are necessary to fill the multiple Code Enforcement Inspector vacancies in L+I during FY17.

In addition, L+I will be filling multiple Customer Service Representative positions during FY17 and will work with OHR to utilize the bi-lingual eligible list for this title. L+I will also

review and determine opportunities for hiring bi-lingual staff in all areas of the Department.

b.) Staff interpreters. Competent and trained bilingual staff can also function as interpreters for other staff, when needs and staffing permits. Bilingual staff should go through formal interpretation training.

c.) Language sensitive assignments – L+I 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 Protocol

a. L+I's Language Access Plan & Protocol will be incorporated into the staff handbook for all employees, posted on the intranet, and provided as a hard copy to all L+I staff members at hiring.

b. L+I 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.

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

d. 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;
- Documenting LEP individuals' language preference;
- 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 or not using bilingual staff as in-house interpreters.

e. L+I will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, L+I will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, L+I 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 six months of the beginning of their employment with L+I. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

f. 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 L+I'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.

g. Orientation- New staff training will be provided on the L+I Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

E. ADMINISTRATIVE HEARINGS

For any L+I-related hearings, including but not limited to Zoning Board of Adjustment, L&I Review Board, Board of Building Standards, and any contractor or other license related hearings, individuals may request interpretation or translation services, as detailed below.

1.) Protocol

a. L+I will provide a trained in-person interpreter for any hearing that an LEP individual requests language assistance with three business days' notice.

b. Once a request for an interpreter has been made, a formal request for an in-person interpreter will be to Language Services Associates. If an in-person interpreter is not available, a telephonic interpreter will be provided.

2.) Future Plans

a. A protocol will be put in place that will identify whether a resident is LEP prior to the hearing in order to plan accordingly for an interpreter.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1. Posters notifying LEP individuals of their right to language services will be developed and displayed in areas of public contact in all L+I offices. 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.
2. Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.
3. 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.

4. 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)."
5. In all areas of public contact and on its website, L+I 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.

7. DATA COLLECTION AND ANNUAL REPORT

Data Collection

L+I will gather and analyze data on the language needs of those who use the Department's services.

L+I will develop the means to identify and record the primary languages of customers, tabulate language data, and mark files with language information so that language appropriate services can be provided as a matter of course in future contacts.

L+I will develop a system to periodically monitor department compliance with policy and protocols, gather language specific data on persons served, the use of language services, and the need for changes in the policy and protocols.

L+I will periodically report to and gather input from stakeholders and establish a procedure to receive and respond to complaints regarding language services.

Annual Report/Evaluation

The Department of Licenses and Inspections 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.

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

Citizens may file a formal Language Access grievance with the Department 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
City Hall, Room 110
Philadelphia, PA 19107
E-Mail: 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

9. TIMELINE FOR IMPLEMENTATION

Implementation Plan Logistics

Major milestones in L+I's Language Access Plan will include:

L+I will begin surveying all Department offices to ensure the locations display appropriate signage. It is anticipated that this survey will be completed and signage installed by September 1, 2016.

L+I will be embarking on a comprehensive review of all critical documents, forms, notices and other communications. Critical documents will be identified for translation into multiple languages. It is anticipated that this comprehensive review to identify all critical documents will be completed by November 30, 2016. Concurrent with this review, L+I will be gathering information to determine the five (5) most common non-english languages spoken by L+I's customers.

L+I is currently working with OIT to review all key online content to be translated. L+I will take reasonable steps to translate public online content through this IT project. As this project is in its infancy, timelines are not yet available but will be communicated to the public as they are known.

Effective upon the implementation of this plan on July 1, 2016, L+I's Language Access Plan & Protocol will be incorporated into the staff handbook for all employees, posted on the intranet, and provided as a hard copy to all L+I staff members at hiring. L+I 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 staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.

L+I will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, L+I will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, L+I 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 six months of the beginning of their employment with L+I. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

10. SIGNATURE PAGE

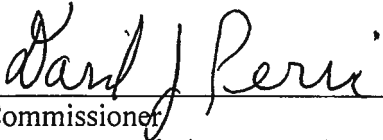


Language Access Coordinator

7-1-16

Date

Administrative Services Director
Department of Licenses and Inspections



Commissioner
Department of Licenses and Inspections

7/1/16

Date

