

# CITY OF PHILADELPHIA – DIVISION OF HOUSING AND COMMUNITY DEVELOPMENT LANGUAGE ACCESS PLAN & PROTOCOL 2016

## **1. PURPOSE AND AUTHORITY**

- A. In Cooperation with the Mayor’s Office, the **Department of Planning and Development** 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 Planning and Development 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 the Planning and Development mission of development coordination, planning, zoning recommendation and housing functions.

## **2. GENERAL POLICY**

- A. Planning and Development recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of Planning and Development to ensure meaningful access to LEP individuals. Planning and Development adopts the following policy to ensure that LEP individuals can gain equal access to DHCD services and communicate effectively. This Plan applies to all Planning and Development offices and satellite offices in the following agencies:
  - Art Commission (AC)
  - City Planning Commission (PCPC)
  - Division of Development Services (DDS)
  - Division of Housing and Community Development (DHCD)
  - Historical Commission (HC)
  - Philadelphia Housing Development Corporation (PHDC)
  - Philadelphia Land Bank (PLB)
  - Philadelphia Redevelopment Authority (PRA)
- 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. Planning and Development intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. Planning and Development seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. Planning and Development, 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 services, 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 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. Staff should seek assistance from professional in-person or telephonic interpreters when staff cannot meet language needs. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff 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.

### **3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE**

**Language Access Coordinator**  
Paul Chrystie  
Director of Communications  
Division of Housing and Community Development  
1234 Market St., 17<sup>th</sup> Floor  
Direct: (215) 686-972d1  
[paul.chrystie@phila.gov](mailto:paul.chrystie@phila.gov)

**Director:**  
Anne Fadullon

### **4. DIRECT CONTACT WITH LEP INDIVIDUALS**

Planning and Development agencies have several points of contact with the public:

- a. **Office Walk-ins** – Each agency serves members of the public who come to the agency office to obtain services or assistance in meeting an agency requirement. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation. Instructions on how to request telephonic interpretation will be made available to staff.
- b. **Phone Calls** – Each agency serves members of the public who contact the agency office via phone to obtain services or assistance in meeting an agency requirement. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation. Instructions on how to request telephonic interpretation will be made available to staff.
- c. **Community Meetings** – PRA and PCPC conduct community meetings at which members of the public are invited to attend to learn about and comment upon agency initiatives. The agency will provide interpretation upon request. All requests should be made at least three days in advance of the meeting.
- d. **Orientation Sessions** – PHDC provides orientation sessions for residents who are about to obtain a housing repair service from a PHDC contractor. PHDC will provide interpretation upon request. All requests should be made at least three days in advance of the meeting.
- e. **In the Field** – HC, PHDC, PLB and PRA all send personnel into the field where they meet with residents. These agencies will explore the means to equip field staff with cards describing the availability of interpretation and the process for obtaining it so that interpretation can take place via a cell speakerphone.

## **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, Planning and Development agencies will continue to provide an interpreter, at no cost, 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, Planning and Development agencies will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

- (1) An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
- (2) 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 in the office is available who speaks the language being requested.

#### **3.) Procedure**

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

##### **Telephonic Interpretation –**

The agencies can get an over-the-phone interpreter. This service is available 24/7. Telephonic interpretation should not take place in the lobby but rather should take place in a more private location.

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

- (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 –**

**All requests for in-person interpretation must be approved by the director of the agency for which the request is being made.**

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.

To submit a request online, visit [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services)

- o Fill out service request form and be sure to select interpretation
- o Enter any interpretation appointment information available
  - You will receive an email once an interpreter has been confirmed

#### Cancellation of In-Person Interpreter

If a request 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/Language Access Goals**

- a. **Use telephonic interpretation, and ensure that the public knows about the availability of these services.** The Planning and Development agencies will institute procedures to provide for telephonic interpretation in their respective offices. The agencies will inform the public about these resources through visible multilingual signs and will train all staff on using telephonic interpretation services.
- b. **Grow In-person interpretation services.** Planning and Development agencies can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. Planning and Development agencies will continue to inform the public about these resources through meeting advertisements, visible multilingual signs and will train all 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, 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.) Protocol for Document Translation**

- a. **Vital Documents – Vital written documents include, but are not limited to: notices of public meetings and notices advising LEP individuals of free language assistance services. Vital documents will be reviewed for potential translation into Spanish. Documents will be translated into other languages upon request. Vital Documents include:**

- i. Registered Community Organization Applications (PCPC)
- ii. Developers Checklist (PCPC)
- iii. Complete Streets Checklist (PCPC)
- iv. Civic Design Review Application (PCPC)
- v. Home Repair Expression of Interest (PHDC)
- vi. Home Repair Application (PHDC)
- vii. Non-residency Form (PHDC)
- viii. Appointment Letter (PHDC)
- ix. Property Acquisition Expression of Interest (PLB, PRA)
- x. Tax Certification Form (PLB, PRA)
- xi. Garden Application (PLB, PRA)
- xii. Garden Lease Agreement (PLB, PRA)
- xiii. Price Acceptance Form (PLB, PRA)
- xiv. Building Permit (PHC)
- xv. Meeting Request Form (DDS)
- xvi. Development Checklist (DDS)
- xvii. Conflict of Interest Form (PRA)
- xviii. Campaign Disclosure Form (PRA)

**NOTE** that this is simply a list of Vital Documents at Planning and Development agencies. Some have already been translated into Spanish, others are primarily from other City agencies with whom translation should be coordinated, and some were still in draft format as of the development of the Language Access Plan.

- b. **Program Documents** – Program documents include information about services or informational guides that are not necessary for a resident to obtain a City service and thus not a Vital Document. Some of these documents are already translated into Spanish. Planning and Development agencies will assess what, if any, other translations are needed. All documents will be translated upon request.

### **3.) Procedure for Submitting a document for translation:**

- a. DHCD has a contract with a professional translator for Spanish translation. To submit a document for translation, DHCD, PHDC, PLB and PRA staff should contact the DHCD Communications Department, which will forward the documents to the translator as necessary.
- b. Translation into other languages or into Spanish by other Planning and Development agencies will be through the Office of Immigrant Affairs using the process below. Each agency is responsible for providing documents for translation to OIA.
  - i. Email the editable document to Office of Immigrant Affairs – Language Access Program Manager at
  - ii. OIA will submit the translation request to translation vendor to obtain a quote.
  - iii. OIA will email you a quote with a time estimate for delivery of the translation.
  - iv. Quote must be authorized by person with authority.
  - v. Quote is then signed and emailed back to OIA.
  - vi. OIA will email you the translated documents.

**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.
- If the translation is a continuation of a series or collection of documents, you may request the same vendor to keep the translation consistent.

### **4.) Signage**

- a. Each Planning and Development agency will review office signage to identify signs that require translation.

### **5.) Website Translation**

- a. Planning and Development agency websites contain information about public meetings, legal notices, application processes, organizational background, program information and more. Each Planning and Development agency will review its website to identify pages that require translation into Spanish.
- b. Tag lines will be included in the websites that explain that LEP individuals can obtain a translation of documents or that interpretation can be made available.

### **6.) Future Plans**

- a. Write public materials in plain English and translate as requested.

## C. BILINGUAL STAFF

### 1) Current Staff

- a. The following non-English languages are spoken by staff at the following agencies:
  - i. AC – None
  - ii. PCPC – French, Gujarati, Hindi, Mandarin Chinese, Spanish
  - iii. DDS – None
  - iv. DHCD – French, Hindi, Spanish, Wolof
  - v. PHC – French, German
  - vi. PHDC – American Sign Language, Fon, French, Russian, Spanish
  - vii. PLB – None
  - viii. PRA – Polish, Russian, Spanish, Vietnamese

### 2) Future Plans

- a. **Hiring** – 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.
- b. **Staff Interpreters** – Competent and trained bilingual staff can also function as interpreters for other staff, when needs and staffing permits. Planning and Development agencies do not currently have formally trained interpreters on staff but has staff that can interpret in a non-technical, non-legal setting.

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

### 1) Training Protocol

- a. The Planning and Development Language Access Plan is part of new employment training and provided as a hard copy to all staff members at hiring.
- b. Planning and Development agencies will distribute the Language Access Plan to all staff and will have a current electronic copy available so that all staff will be knowledgeable of language access policies and protocols.
- c. All staff will receive language access training upon employment and then refresher courses annually as needed.
- d. Language access training will include information on the following topics:
  - i. Legal obligation to provide language assistance;
  - ii. Language access plan and protocols;
  - iii. Cultural competency;
  - iv. How to use/request current language services

### 2) Future Plans

- a. Planning and Development agencies will work to provide bilingual employees with formal interpretation training and expand training opportunities on plain-language and cultural competency topics.

## E. ADMINISTRATIVE HEARINGS

*This section applies to departments that hold administrative hearings. State law (2 C.S. § 561 et seq. (Act 172 of 2006)), requires the appointment of certified or otherwise qualified interpreters for local administrative hearings. In this section list the protocols for language access in administrative hearings.*

AC, DHCD, PHC, PCPC, PLB and PRA all hold public meetings. Each will provide interpretation upon request. All requests should be made at least three days in advance of the meeting.



## **7. DATA COLLECTION AND MONITORING**

### **A. Data Collection**

Planning and Development will collect the following information and provide it in quarterly reports to the Office of Immigrant Affairs:

- (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

Additionally, the Planning and Development Language Access Coordinator will 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.

### **B. Annual Report/Evaluation**

- 1) Planning and Development 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 staff from each agency. 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) Each agency 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.
  - a. Planning and Development's Language Access Coordinator will track the number of individuals that are assisted or unable to be assisted by the person's language of choice. This information will be considered as part of the annual Language Access Plan report.
- 3) Evaluation results and recommended changes will be shared by Planning and Development'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 a record 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, Planning and Development 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



## **8. LANGUAGE ACCESS GRIEVANCE 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  
City Hall, Room 110  
Philadelphia, PA 19107  
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 St., 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)

## **9. 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
- 3.) Exploring additional training opportunities

Timeline:

#### FY 2017

- 1.) Implement language access protocol, utilizing telephonic and in-person interpretation as needed
- 2.) Assess translation needs of Vital Documents
- 3.) Assess if other documents should be translated
- 4.) Have all employees trained in Language Access/Cultural Competency
- 5.) Provide public notice of available language services through use of signage available in main offices
- 6.) Add language access tag line to websites
- 7.) Review any Language Access comments or complaints and determine possible changes

#### FY 2018

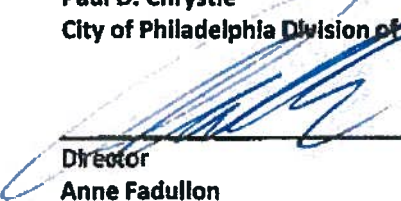
- 1.) Work outlined in 2016 will continue
- 2.) Review Language Access Report and assess data and use to make further changes to the Language Access Plan
- 3.) Explore website translation options
- 4.) Agency will adjust and update this plan as needed

## **10. SIGNATURE PAGE**



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Language Access Coordinator  
**Paul D. Chrystie**  
City of Philadelphia Division of Housing and Community Development



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Director  
**Anne Fadullon**  
City of Philadelphia Department of Planning and Development