

CITY OF PHILADELPHIA DEPARTMENT OF RECORDS

Language Access Plan

FY 2017

1. Purpose and Authority

A. The **Department of Records (DOR)** 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 DOR personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP).

C. The Home Rule Charter charges DOR with the responsibility for recording all City land records and for maintaining City records for public use and facilitating the public’s right to inspect certain City records, and following this plan and protocol is essential to successfully delivering these services to all Philadelphia citizens and other customers.

2. General Policy

A. DOR recognizes that its customers and other members of the public who use DOR’s services include individuals who are LEP. It is the policy of DOR to ensure meaningful access to LEP individuals. DOR adopts the following policy to ensure that LEP individuals can gain equal access to DOR services and communicate effectively. This Plan applies to all DOR 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. The DOR intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The DOR seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

C. Responsibility Statements

- DOR recognizes its 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, is discouraged.
- DOR staff understand that minor children are prohibited from acting as interpreters and will act accordingly.
- 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 the assistance of in-person or telephone interpreters. The Department's major point of contact with customers and the public relates to the recording of land records, which has significant legal implications. Further, deeds and related documentation contain legal and technical language requiring sophisticated interpretation and translation skills.
- Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff. DOR does have a number of bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter because these staff members are familiar with and experienced in our materials and our customers' issues.
- Staff will seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs.
- DOR employees are authorized and encouraged to provide language services to communicate effectively even when such assistance is not requested by the customer.

3. Language Access Coordinator and/or Committee

Language Access Coordinator:

Lynda Yerkov
City of Philadelphia Department of Records
City Hall, Room 156
Direct: (215) 686-2268
Lynda.Yerkov@phila.gov

DOR Department Head: James P. Leonard, Esq., Commissioner

DOR is in the process of establishing a **language access committee (LAC)** that will support implementation and compliance with DOR language access activities is pending.

4. Direct Contact with LEP Individuals

The DOR has significant contact with the public and serves necessary functions for individuals in Philadelphia.

The DOR has several points of contact with the public at City Hall and at the City Archives facility:

1. Recorder of deeds: Each day, dozens of individuals visit or call Room 111 of City Hall to record deeds, mortgage satisfactions, and other related documents with DOR. Bilingual staff and telephonic interpretation are used.
2. Other City Hall walk-ins and calls: Each day, individuals seek inspection of public filings, historic land records (City Hall, Room 154), and public safety agency incident records (City Hall, Room 168). At times, individuals also come to or call DOR Executive Offices (City Hall, Room 156) with questions on any number of issues within DOR's purview. DOR uses bilingual staff and telephonic interpretation to assist customers.
3. City Archives: Three days a week, the Archives are open to researchers and other members of the public. If language needs are anticipated, DOR will utilize in-person and telephonic interpretation to assist customers.
4. Citizen/customer outreach events: Periodically, DOR staff will participate in community outreach events relating to land title issues and home ownership. If language needs are anticipated, DOR or partner agencies will utilize in-person interpretation for appropriate languages.

5. Language Access Services and Protocols

DOR will implement interpretation and translation activities to provide LEP persons with meaningful access to its services and programs.

A. Interpretation

- Services Provided
 - To ensure that the inability to communicate in English does not deprive the public of rights and privileges, each Division of DOR will continue to provide an interpreter, at no cost to the resident, for LEP individuals. Services offered include telephonic interpretation and in-person interpretation.
- Protocols

Department of Records (DOR)
Language Access Plan

- o 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:
 - i. An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
 - ii. 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.
- o DOR has signage prominently displayed in customer service areas alerting customers that bilingual services are available.
- Procedures
 - o 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 –

DOR can get an over-the-phone interpreter by calling the following vendor: LanguageLine. This service is available during our regular business hours.

To submit a request, call [redacted] and provide the following information when greeted by a coordinator:

- Access Code:

- o If 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.

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

Department of Records (DOR)
Language Access Plan

- 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 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.)

All DOR staff are aware of how to utilize the language line phones and also how to reach out to our bilingual employees when the need arises.

- Future Plans
 - DOR will conduct a comprehensive review of the resources (e.g., language cards, language line phones) that have been made available for each Division of the department and will assure that all units are covered.
 - DOR will work with OIA on developing taglines for the major customer facing services. Taglines 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 how individuals with LEP can obtain translation of the document or an interpreter to read or explain the document.
 - DOR will continue to grow interpretation services. DOR will continue to inform the public about these resources through its website, visible multilingual signs and will train all of its staff on requesting interpretation services.

B. 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 vital documents, signage and portions of our website.
- Protocols
 - DOR has identified documents that are vital to the access of LEP persons to our legally-mandated delivery of services (i.e., land title records recording). We provide some of these vital documents in languages other than English.
 - DOR has signage prominently displayed in customer service areas alerting

- o customers that bilingual services are available.
- o The Department also provides bilingual pamphlets outlining DOR services which are located in all customer service areas.
- Procedures for submitting a document for translation: DOR strives to follow consistent procedures for submitting documents for translation. This process follows:
 - o Email the editable document to Office of Immigrant Affairs – Language Access Program Manager at Orlando.almonte@phila.gov
 - o OIA will submit the translation request to translation vendor to obtain a quote.
 - o OIA will email you a quote with a time estimate for delivery of the translation.
 - o Quote must be authorized by person with authority.
 - o Quote is then signed and emailed back to OIA.
 - o OIA will email you the translated documents.

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

- o The content has not already been translated in another document.
- o The document and translation procedure have been approved by your supervisor.
- o The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)
- o Terms you do not want translated are highlighted, i.e. the name of your unit, program or street.
- o The document is written so it can be understood by readers with lower literacy skills.
- o If the translation is a continuation of a series or collection of documents, you may request the same vendor to keep the translation consistent.

- Signage

DOR has signs in our facilities and offices office to better aid the public in obtaining services. The following signs will be translated into Spanish:

- o The Line Forms Here
- o Please Make Check Payable to “City of Philadelphia”
- o Record Your Deed Here

- Future plans

- o We will add bilingual information to the automated attendant.
- o DOR will conduct a comprehensive review of documents that are critical to service provision in each Division and Unit of the agency. Following this assessment, DOR will make efforts to translate these documents.
- o DOR will work with OIA on developing taglines for the major customer facing services. Taglines 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 how LEP individuals can obtain translation of the document or an interpreter to read or explain the document.
- o Write public materials in plain English, and translate extensively. DOR's LAC may be able to assist in editing public materials for plain language in preparation for them to be translated.
- o We will consider the usefulness of a formal language certification process for certain employees

C. Bilingual Staff

- Current Staff. This list identifies the languages spoken by staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters:
 - o Spanish
 - o Malayalam

Existing DOR-specific job classes contain language service qualifications.

- Future Plans
 - o Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs.
 - o Language skill needs may be addressed in any one of three ways:
 - Create new positions for and hire full-time or part-time employees within departments using standard hiring processes.
 - 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.
 - Include the language skills as a "desirable" qualification in job announcements.
 - o 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. Assessment may include:

- Formal testing of language proficiency or interpreting/translation ability; and certification, transcripts, diplomas or other evidence of language proficiency in English or other language; or
- Certification, transcripts, diplomas or other evidence of training in interpreting and/or translation.

D. Training Staff on Policy, Plan and Protocols

- Training Protocol
 - DOR's Language Access Plan will be made part of the staff handbook, posted on the intranet, and provided as a hard copy to all DOR staff members at hiring.
 - DOR will distribute the LEP plan to all staff electronically 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.
 - 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 individual's' 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.
 - DOR will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, DOR will circulate the revised policy and protocols to all staff after adoption. Within twelve months of the adoption of this policy, DOR 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 twelve months of the beginning of their employment with DOR. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

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

6. Notice of the Right to Language Access

DOR will give notice to the public and LEP population of the language access services that are available.

- 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.
- 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, DOR will make every effort to 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

DOR will track its Language Access data.

A. Quarterly Report

DOR will monitor and collect the following information, which in turn will be collected via quarterly reports by the Office of Immigrant Affairs:

- Number of LEP Encounters (By Language)
- Type of Language Services Provided to LEP Customers
- Number of Documents Translated
- Language Services Expenditures

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

- Number of bilingual staff
- 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

- DOR 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 Commissioner and Deputy Commissioner. The evaluation will include the following:
 - Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
 - Assessment of data collected about the LEP's primary language.
 - Assessment of the number and types of language requests during the past year.
 - 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.
 - Assessment of complaint information; and
 - Assessment of soliciting feedback from LEP individuals and community groups.
- DOR intake personnel will record each person's language of choice to ensure that the information can be used by staff and tracked by the Language Access Coordinator.

- o If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.
- o DOR'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.
- Evaluation results and recommended changes will be shared by DOR's Language Access Coordinator and incorporated into **the annual report which is required to be filed by Philadelphia Home Rule Charter § 8-600.**
- Over time, 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, DOR may use some of the following tools to conduct further assessment:
 - o Request comments and feedback from visitors that have received language services
 - o Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

8. 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 John F. Kennedy Blvd., Suite 1430
Philadelphia, PA 19102
E-Mail: orlando.almonte@phila.gov

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 intake form and for more information, please visit
www.phila.gov/humanrelations

9. Timeline for Implementation

Major milestones in our plan will include:

- Continuing to broadly translate and interpret
- Updating agency language access tools and resources
- Exploring additional training opportunities

Timeline

2017

- The Language Access Coordinator will survey the different divisions and units of DOR to assess current Language Access (LA) protocols implemented in the DOR
- The Language Access Coordinator will reach out to DOR employees to determine appropriate representation and composition of a DOR LAC.
- The Language Access Coordinator will convene the LAC to discuss objectives and operating ground rules.
- The LAC will meet with DOR staff in each relevant division providing front-line customer services to discuss language access challenges, best practices and uniform methods for tracking language access data by program/site, as well as to brainstorm ideas for new or updated language access resources these staff might need.
- The LAC will explore ways to track and certify DOR staff who speak other languages and who are willing to help review translations and provide interpretation services; this will include updating the agency's internal records. DOR will evaluate alternative training and certification resources for these volunteers.
- The LAC will update the agency's internal protocols for written translations and in-person interpretations, respectively.
- The LAC will work with OIA to learn about opportunities for plain language and/or cultural competency trainings.

Department of Records (DOR)
Language Access Plan

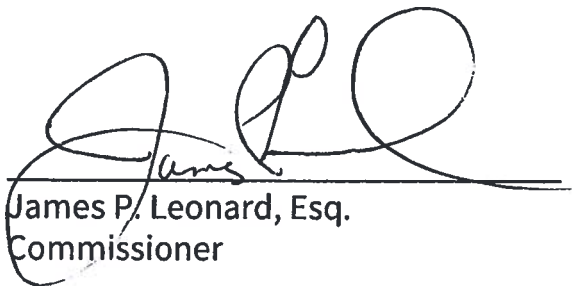
- The DOR will continue to broadly translate materials and provide on-site interpretation as needed, and begin to track these activities.
 - The LAC will work with OIA to develop taglines
 - The Publications and Language Access group will update the Language Access Toolkit (a language access policy and training tool) and will distribute the updated toolkit to staff in the agency's public programs.
 - The LAC will explore ways to track and certify DOR staff who speak other languages and who are willing to help review translations and provide interpretation services; this will include updating the agency's internal records. DOR will evaluate alternative training and certification resources for these volunteers.
 - The LAC will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.
 - The LAC will communicate with other City agencies about best practices, tools that can be shared and challenges.
 - The LAC will work with other groups in the agency to coordinate plain language and/or cultural competency trainings.
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10. Department Signatures



Language Access Coordinator

11/1/2016
Date



James P. Leonard, Esq.
Commissioner

11/1/2016
Date