

**OFFICE OF ARTS, CULTURE AND THE CREATIVE**  
**ECONOMY**  
**LANGUAGE ACCESS PLAN & PROTOCOL**  
**2016**

**1. PURPOSE AND AUTHORITY**

In Cooperation with the Mayor's Office, the Office of Arts, Culture and the Creative Economy (OACCE) 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").

The purpose of this document is to establish an effective plan and protocol for OACCE 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 support and promote arts, culture and the creative industries; and to develop partnerships and coordinate efforts that weave arts, culture and creativity into the economic and social fabric of the City.

**2. GENERAL POLICY**

The OACCE recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the OACCE to ensure meaningful access to LEP individuals. OACCE adopts the following policy to ensure that LEP individuals can gain equal access to OACCE's services and communicate effectively.

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

**A. 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

**B. Preferred Method of Service:**

1) Staff should seek assistance from professional in-person or telephone 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.

2) The secondary 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.

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

4) Staff must be trained and able 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:*

*Margot Berg*

*Public Art Director*

*Office of Arts, Culture and the Creative Economy*

*City Hall, Room 116*

*Direct: (215) 686-4596*

*Margot.berg@phila.gov*

**Chief Cultural Officer:**

*Kelly Lee*

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

The Office of Arts, Culture and the Creative Economy has two potential points of contact with the public:

(1) Gallery visitors and walk-ins – The gallery is open to the public and those visiting City Hall for other services. LEP individuals may come into the OACCE gallery looking for direction, seeking help in obtaining services, or to look at the artwork on display. In these instances, if there is no bilingual staff available to interpret, staff should advise the LEP that interpretation services can be made available by appointment.

(2) Calls to Artists - at times OACCE issues artists' opportunities for Art in City Hall and the Percent for Art Program. If language needs are anticipated or requested, OACCE will provide interpreters or translation services.

## **5. LANGUAGE ACCESS SERVICES AND PROTOCOLS**

### **A. INTERPRETATION**

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:

- (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.

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

Telephonic Interpretation –

OACCE can get an over-the-phone interpreter by calling the following vendor: Language Services Associates. This service is available 24/7.

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.

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.

**Before submitting a request for in-person interpretation, please receive approval from the language access coordinator.**

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

- Fill out service request form and be sure to select interpretation
- Enter any interpretation appointment information available
  - 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.)

1.) **Future Plans-** What is the plan for improving on already established interpretation services and protocols?

- a. **Use telephonic interpretation, and ensure that the public knows about the availability of these services.** OACCE 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 on using telephonic interpretation services.
- b. **Grow in-person interpretation services.** OACCE can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. OACCE will continue to inform the public about these resources through social media, visible multilingual signs and will train all of its staff on requesting in-person interpretation services.
- c. **Expand services to American Sign Language (ASL) to ensure that citizens hard of hearing, deaf, speech impaired, and/or deaf have access to OACCE resources.**

## **B. TRANSLATION**

### 1.) **Services Provided**

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

### 2.) **Protocols for Document Translation**

- a.) **Vital documents** - Vital written documents include, but are not limited to: Calls to Artists and promotional materials.

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

Email the editable document to Office of Arts, Culture and the Creative Economy – Language Access Program Manager at [margot.berg@phila.gov](mailto:margot.berg@phila.gov)

Margot will submit the translation request translation vendor to obtain a quote.

OACCE will obtain a quote with a time estimate for delivery of the translation.

Quote must be authorized by person with authority.

Quote is then signed and emailed back to OACCE.

OACCE will provide 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.

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

The OACCE currently has no established translation services or protocols and has not received requests for these services. In FY 17-19, the OACCE will identify documents and web pages that are appropriate to translate and into what languages.

### **C. BILINGUAL STAFF**

**1.) Current Staff:** The OACCE staff is very small – currently eight employees.

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

Jacque Liu - Mandarin

Pamela Yau - Cantonese

## 2.) Future Plans-

- a.) **Hiring.** When hiring, the OACCE will endeavor to encourage bilingual or multilingual applicants to apply for opportunities with the OACCE. We will include the language skills as a “desirable” qualification in job announcements.

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

#### 1) Training Protocol

- a. The OACCE’s Language Access Plan & Protocol is part of office policy, posted on the staff shared drive, and provided as a hard copy to all OACCE staff members at hiring.
- b. OACCE 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. 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.
- d. **The OACCE** will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, OACCE will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, OACCE will provide cultural competency training, including training in regard to this policy and the appropriate use of interpreters and translators, to any 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 OACCE. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.
- e. 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 OACCE’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.

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

2.) Future Plans

- a. Further standardize language access resources and tools in the OACCE.

## **6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS**

1. A poster notifying LEP individuals of their right to language services will be developed and displayed in the art gallery. The poster 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 principal 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. 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 individuals with LEP can obtain translation of the document or an interpreter to read or explain the document.
4. In all areas of public contact and on its website, (OACCE) 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**

The following information will be required to be monitored and collected by the OACCE and will be collected via quarterly reports by 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, Language Access Coordinators will be required to 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

## **ANNUAL REPORT/EVALUATION**

- 1.) The OACCE 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 Chief Cultural Officer. 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.) The OACCE will record any LEP 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. The person's language of choice will be noted for future visits.
  - b. OACCE'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 OACCE'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 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 Office of Immigrant Affairs 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 COMPLAINT PROCEDURE**

You may file a formal Language Access grievance with the OACCE 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 Arts, Culture and the Creative Economy  
Margot Berg  
Language Access Program Manager  
City Hall, Room 116  
Philadelphia, PA 19107  
E-Mail: [margot.berg@phila.gov](mailto:margot.berg@phila.gov)

The form will also be available on OACCE's website.

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](http://www.phila.gov/humanrelations)

## **9. TIMELINE FOR IMPLEMENTATION**

Implementation Plan Logistics

- The OACCE will continue to monitor the need for language services, and to provide translation and interpretation as needed.

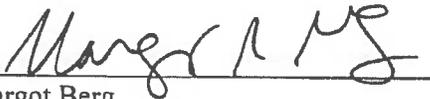
2017

- The OACCE will continue to monitor the need for translation and interpretation, and to respond.
- The OACCE will adjust and update this plan as needed.

2018

- The OACCE will continue to monitor the need for translation and interpretation, and to respond.
- The OACCE will adjust and update this plan as needed.

## 10. SIGNATURE PAGE



Margot Berg  
Public Art Director  
(Office of Arts, Culture and the Creative Economy)



Kelly Lee  
Chief Cultural Officer  
(Office of Arts, Culture and the Creative Economy)

