



Language Access Plan and Protocol

311 Contact Center
Managing Director's Office
September 2016



1. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the 311 Contact Center is committed to compliance with Title VI of the Civil Rights Act of 1964 (prohibits discrimination on the basis of race, color or national origin), 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 311 Contact Center 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 "Is to provide direct access to City government information and services while delivering world-class customer service.

2. GENERAL POLICY

The 311 Contact Center recognizes that the population eligible for services includes individuals who have limited English proficiency (LEP). It is the policy of the 311 Contact Center to ensure meaningful access to LEP individuals. The 311 Contact Center adopts the following policy to ensure that LEP individuals can gain equal access to the 311 Contact Center's services and communicate effectively. This Plan applies to all 311 Contact Center offices and satellite offices.

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 311 Contact Center intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The 311 Contact Center seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

A. Responsibility Statements

It is the 311's Contact Center's responsibility to provide language appropriate services; not the customer. This includes;

1. Advising the customer of language services.
2. Staff at initial point of contact will identify, record and provide language needs.
3. Discouraging the use of informal interpreters such as family, friends of the person seeking service, or other customers.
4. Notifying customers that minor children are prohibited from acting as interpreters when

appropriate.

5. Staff may not suggest or require that any customer including those that have limited English proficiency provide their own interpreter in order to receive services.

B. Preferred Method of Service

Staff will seek assistance from professional telephone interpreters or the Office of Immigrant Affairs for in-person interactions when the 311 Contact Center staff cannot meet language needs using identified and available resources. Certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available. 311 Contact Center is authorized to provide language services to communicate effectively even when such assistance is not directly requested by the customer. The following preferred methods are used to provide service to LEP customers in their primary language.

1. Customer interactions by telephone

Staff will use the designated *Language Assistance Service* that is programmed in the telephone system used in the Call Center.

2. Face-to-face interactions

- a. Staff in the Walk-in Center will use the double headset telephone at the customer service counter and posted *Language Assistance Service* telephone number or seek assistance from an available competent bilingual staff member.
- b. The department will maintain and make available a list of bilingual staff members who are authorized to assist with language translations.

3. Digital interactions such as email, mobile app, social media, web, etc.

- a. Staff will seek assistance from a competent bilingual staff member or seek assistance from the Office of Immigration Affairs.

4. Letters, faxes, etc.

- a. Staff will seek assistance from a competent bilingual staff member or seek assistance from the Office of Immigration Affairs.

5. Use of bilingual staff

- a. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
- b. The department will maintain and make available a list of bilingual staff members who are authorized to assist with language translations.

3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE

The Language Access Coordinator is responsible for the language access planning and implementation. This person shall be the liaison between the department (311 Contact Center) and the Office of Immigrant Affairs. The Coordinator shall report to the Director or his designee and shall be provided with appropriate time and support to carry out these duties.

A. Role

1. Act the liaison between the Department and the Office of Immigrant Affairs.
2. Advise the Commissioner or head of the office, board, or commission on language access policy, protocol, plan implementation, and related language access issues.
3. Act as lead of the Language Access Committee, if your department chooses to create one.
4. Act as key point person for implementation and accountability of the department's language access plan.

B. Policy Planning and Implementation

1. Work with their department to develop a comprehensive language access plan, which includes protocols to carry out the plan. This plan shall be in accordance with all Executive Orders and the Managing Director's Office (MDO) directives.
2. Consult with stakeholders in devising the department language access plan, policies and protocols. This may include and is not limited to language service providers, staff in various units, community advocates and community organizations.

C. Annual Report

1. Write and file the department's annual report as required by the Philadelphia Home Rule Charter, 6-800 (1) (c).
2. Provide periodic updates of monitoring information and analysis to the Office of Immigrant Affairs.

D. Training

1. Establish a training schedule and organize regular, ongoing training of department staff to ensure they are aware of the department's language access plan, protocols and that newly hired staff are provided language access training.
2. Review language access training materials on an annual basis and work with appropriate resources to update as needed.

E. Outreach

1. Work with the department to develop means of notifying the public of the availability of language services within the department and how to access them. This may include: public advertising, community outreach, posted notices in public service areas, tag lines on department documents, the department's content on the City's website, telephone answering systems and other media systems.
2. Develop a method to periodically report to and gather input from stakeholders.

F. Provision of Services

1. Become familiar with the language access service contracts available through the Office of Immigrant Affairs and serve as central point of contact to vendors in the request and provision of these services within the department.
2. Serve as a resource and troubleshooter for staff on using language services.
3. Handle complaints and receive other feedback about the use of language services.
4. Serve as the point person for correspondences with the Office of Immigrant Affairs regarding billing and invoicing.

G. Monitoring

1. Collect, track and report language specific data on persons served, the use of language services, and the need for changes in the policy and protocols.
2. Develop system to ensure that contractors or grantees of the department comply with the department's language access policy.
3. Develop a procedure for the department to receive and respond to complaints regarding language services.
4. Attend meetings with other Language Access Coordinators to discuss issues related to language access services within their departments.

H. 311 Contact Center Language Access Coordinator and Authorizing Executive

Language Access Coordinator

Maryelis Santiago

City of Philadelphia

Managing Director's Office – 311 Contact Center

City Hall, Room 167

Maryelis.Santiago@phila.gov

Executive Director
Tim Thornton
Managing Director's Office – 311 Contact Center

4. DIRECT CONTACT WITH LIMITED ENGLISH PROFICIENT INDIVIDUALS

The 311 Contact Center has several points of contact with the public. The following identifies the points of contact and how language assistance is provided for each.

1. Call Center: The call center receives an average of 9,500 calls from the public weekly seeking information and/or to request services related to City government services. Telephonic interpretive assistance will be provided to customers when needed.
2. Face-to-Face: The Walk in Center receives an average of 205 in person contacts weekly seeking information and/or to request services related to City government services. Telephonic interpretive assistance will be provided to customers when needed. If available, a competent bilingual staff member may provide interpretive assistance in these situations.
3. Digital Interactions: The contact center receives an average of 3,159 electronic contacts weekly such as email, mobile app, social media, web, etc. Staff will seek interpretation or translation assistance from a competent bilingual staff member or from the Office of Immigration Affairs.
4. Hard Copy Requests: The contact center occasionally receives letters, faxes, etc. Staff will seek translation assistance from a competent bilingual staff member or seek assistance from the Office of Immigration Affairs.
5. Community Engagement Activities: Contact center staff attend community engagement events. If language needs are anticipated, staff will seek interpretive assistance from event organizers or a competent bilingual staff member for in-person interpretive assistance in the appropriate language.

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. Current Plan

The 311 Contact Center provides language assistance at no cost to limited English proficient (LEP) customers who utilize the call center, walk in center and Philly311 mobile application.

1. Call Center
 - a. Telephonic interpreter services are provided using the *Language Line Services* [vendor].
 - b. Use available bilingual staff within the department.

2. Walk-in Center

- a. Telephonic interpreter services are provided using the *Language Line Services* [vendor].
- b. Use available bilingual staff within the department.

3. Digital/Electronic Interactions

- a. Seek assistance from the Office of Immigration Affairs.
- b. Use available bilingual staff within the department.
 - i. Mobile App is able to translate customer requests in the 13 most popular languages spoken in Philadelphia after English; based on customers' device capability to translate in the specified language(s).
 - ii. Languages

Arabic	French	Korean	Serbian
Cambodian (Khmer)	German	Mandarin	Spanish
Cantonese	Greek	Polish	Turkish
English	Italian	Russian	Vietnamese

4. Letter and Faxes

- a. Seek assistance from the Office of Immigration Affairs.

5. Information in the knowledge base for handling complaints related to customers who have been denied language translation assistance.

6. Community Events

- a. Mobile App presentation translated in Spanish.
- b. Ways to connect with Philly311 rack card in Spanish.

7. Use available bilingual staff within the department.

8. Language assistance training is included in new employee training that includes call simulation practice.

B. Future Plans

The 311 Contact Center plans to enhance the level of translation assistance services to our customers through the actions listed below.

1. Implemented with the next 12-24 months.
 - a. Identify and train bilingual staff in standards for providing language translation assistance.
 - b. Expand Information in the knowledge base for handling complaints related to LEP customers who have been denied language translation assistance or service.
 - c. Post general information and frequently asked questions responses on social media; Facebook and Twitter in Spanish.
 - d. Enhance language translation assistance training.
 - e. Translate most frequently asked questions in public knowledge base in Spanish, Mandarin and Cantonese (top three languages spoken Philadelphia after English).
 - f. Translate 311 web content in Spanish, Mandarin and Cantonese (top three languages spoken Philadelphia after English).
 - g. Obtain resource(s) to assist with translating and responding to non-English written communications.
 - h. Translate following documents and materials in Spanish (top language spoken Philadelphia after English).
 - i. Mobile App handout and rack card
 - ii. Neighborhood Liaison presentation, handout and rack card
 - i. Obtain language access information cards translated in 13 most popular languages spoken in Philadelphia; see A.3.b.ii in this section for list. Used at community events and in the walk in center.
 - j. Identify resource(s) to translate for hearing impaired who speak Spanish.
 - k. Translate documents and materials in braille for seeing impaired individuals who speak Spanish.
2. Implemented with the next 24+ months.
 - a. Translate most frequently asked questions in public knowledge base in Arabic, Cambodian (Khmer), French, German, Greek, Italian, Korean, Polish, Russian, Serbian, Turkish, Vietnamese.
 - b. Translate 311 web content in Arabic, Cambodian (Khmer), French, German, Greek, Italian, Korean, Polish, Russian, Serbian, Turkish, Vietnamese.

- c. Post general information and frequently asked questions responses on social media; Facebook and Twitter in Arabic, Cambodian (Khmer), Cantonese, French, German, Greek, Italian, Korean, Mandarin, Polish, Russian, Serbian, Turkish, Vietnamese.
- d. Translate following documents and materials in Arabic, Cambodian (Khmer), Cantonese, French, German, Greek, Italian, Korean, Mandarin, Polish, Russian, Serbian, Turkish, Vietnamese.
 - i. Mobile App handout and rack card
 - ii. Neighborhood Liaison presentation, handout and rack card
- e. Translate documents and materials in braille for seeing impaired individuals who speak Arabic, Cambodian (Khmer), Cantonese, French, German, Greek, Italian, Korean, Mandarin, Polish, Russian, Serbian, Turkish, Vietnamese.
 - i. Mobile App presentation, handout and rack card
 - ii. Neighborhood Liaison presentation, handout and rack card
- f. Identify resource(s) to translate for hearing impaired who speak Arabic, Cambodian (Khmer), Cantonese, French, German, Greek, Italian, Korean, Mandarin, Polish, Russian, Serbian, Turkish, Vietnamese.

INTERPRETATION

A. Services Provided

1. The 311 Contact Center provides and will continue to provide interpretation services over the telephone through a contract with Language Line Services at no cost to the customer. Interpretation services are available in the top 13 languages spoken in Philadelphia up to 170+ other languages. This service is available in the Call and Walk in Centers.
2. In person translation services are provided when possible based on availability of available competent bilingual staff.

B. Protocols

1. Employees are trained upon hire on the expectations and protocols for assisting LEP customers. The telephone number for Language Line Services pre-programmed into the telephonic system used by the Call Center staff and the information is available in the 311 shared drive for non-Call Center staff.
 - a. Language Line Services Quick Reference Guide
 - b. Philadelphia's Language Access Program Presentation

C. Procedures

1. Procedures for assisting LEP customers are provided in the following materials for telephonic and in person assistance:
 - a. Language Line Services Quick Reference Guide
 - b. Philadelphia's Language Access Program Presentation

FUTURE PLANS

A. Telephonic/in-person interpretation services and public outreach

1. The 311 Contact Center will continue to utilize the designated telephonic interpretation services that is available in over 170 languages. More emphasis will be placed on making the public aware of these services via social media and attendance at community events.

B. Document interpretation

1. Work with the Office of Immigrant Affairs to identify resources to assist with document and written translations; includes emails, social media, web, and other self-service channels.

C. Training

1. Enhance training by reviewing training materials annually, conferring with the Office of Immigrant Affairs and making updates as needed. Conduct annual refresher training for staff.
2. Train bilingual employees on the standards for providing translation assistance. Conduct refresher training annually.

D. Performance Metrics

1. Develop performance measures to evaluate quality of assistance provided to LEP customers.

E. Grow bilingual staff

1. Work with the Human Resources department to develop a strategy to attract bilingual candidates.
2. Develop and maintain a list of bilingual employees with spoken languages. Work with the Office of Immigrant Affairs to identify employees throughout the City who speak languages other than English.

TRANSLATION

A. Documents

1. The following 311 related documents are currently translated from English to Spanish.

- a. Mobile App presentation
 - b. Ways to connect with Philly311 rack card
2. The following materials are available in the 311 Walk in Center and are translated from English to Spanish.
- a. Language access information signs (provided by the Managing Director's Office)
 - b. eCLIPSE Guide (provided by the Licenses + Inspections Department)
 - c. Paid Sick Leave information sheet (provided by the Managing Director's Office)

B. Services Provided

1. Current

- a. The 311 Contact Center will continue to provide translation services at no cost to customers.
- b. Signage: The 311 Contact Center has signs to aid the public in obtaining translation services at no cost to the customer.

2. Future

- a. The 311 Contact Center will continue to provide translation services at no cost to customers. This includes translations of vital documents, signage, portions of our website and other self-service channels.
- b. Protocols for Document Translation – To be developed
- c. Vital written documents will include and are not limited to case status and relevant updates, community engagement materials (rack cards, handouts, and presentations).
- d. Vital documents – To be developed
- e. Procedure for submitting a document – To be developed
- f. Signage

B.2.f.1. The department will develop signage to advise the customers of their rights to and how to file complaints in Spanish, Cantonese, and Mandarin (target: 12-24 months). Same signage will be developed in Arabic, Cambodian (Khmer), French, German, Greek, Italian, Korean, Polish, Russian, Serbian, Turkish, Vietnamese (target: 24+ months)

- g. Website

- h. The department will work in conjunction with the Office of Immigrant Affairs and the Office of Information Technology to translate the following on the 311 website:
 - Frequently asked questions in the public knowledge base.
 - Service requests listed under submit a request.
 - Track a request standardized updates.
 - Add taglines to advise customers to call 3-1-1 for translation services assistance.
 - Add video on home page to advise customers of their rights to translation services (languages and time frame to be determined).

FUTURE GOALS

A. Goals

1. The 311 Contact Center will continue to develop and edit public materials for LEP customers at no cost to the customer. The Language Line Services will continue to be used for telephonic and Walk in Center translations. department will work with the Office of Immigrant Affairs to identify additional resources to ensure translations are clear and consistent.
2. Validation of language competency and training will be provided to bilingual employees to ensure quality and consistency. These employees may assist when available with social media, self-service channels, telephonic, walk in center and letter/fax customer interactions.

CURRENT STAFF

This list identifies the languages spoken by the 311 Contact Center staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

Employee	Language
[REDACTED]	Cantonese
[REDACTED]	Spanish
[REDACTED]	Spanish
[REDACTED]	Spanish
[REDACTED]	Spanish
[REDACTED]	Spanish

FUTURE PLANS

A. Hiring

Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Bi- or multi-language needs will be addressed if they are bona fide occupational qualifications. When it has been determined that there is a need the 311 Contact Center will work with the Human Resources department to develop a strategy to attract bilingual candidates that include and is not limited to;

1. Reviewing and updating job specifications to include language needs.
 - For Civil Service positions the Civil Service Commission Regulation 11/032-*Selective Factor Certification* will serve as a guide for needed language proficiencies.
 2. Creating a process whereby Intern/Temporary positions opening enable candidates to self-identify and validate competency for needed language proficiencies.
 3. Will Include language skills as a desirable qualification in job announcements.
- B. Work with the Human Resources department and the Office of Immigrant Affairs to validate language competency of current bilingual staff.
- C. Establish criteria and protocols for translation assistance to LEP customers across all channels such as email, face-to-face, mobile app, social media, telephone, etc. and when participating in community events.
- D. Train bilingual staff on criteria and protocols for assisting and/or interacting with LEP customers.
- E. Develop performance measures to evaluate quality of assistance provided to LEP customers.

TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

A. Current

1. Training Protocol

The 311 Contact Center provides training to new employees who may frequently come into contact with Limited English Proficiency (LEP) customers. Positions include Contact Center agents, specialists and supervisors. The following materials and hands on experience are used during training for telephonic and in person assistance.

- i. Language Line Services Quick Reference Guide

- ii. Philadelphia's Language Access Program Presentation
- iii. Call simulations that include bilingual staff calling trainees in language other than English with questions typically received by the 311 Contact Center.

B. Future

1. Training Protocol

The 311 Contact Center will provide training to all staff (new and existing employees) and refresher training will be conducted on an annual basis. Employees will be required to acknowledge attendance via sign in sheets and/or certificates of completion.

i. Materials Used

- Language Line Services Quick Reference Guide
- Philadelphia's Language Access Program Presentation – Latest version
- 311 Language Access Plan – electronic copy will be made available for employees' reference in a centralized location.
- Videos to reinforce importance of customer service standards when assisting LEP customers.

ii. Copies and Documentation

- Employees will receive hard copy handouts of during training and electronic versions will be available in a centralized location.

iii. Core Training

- Cultural competency.
- Definition of LEP.
- Rights of LEP customers.
- City of Philadelphia's legal obligations to LEP customers.
- Why providing translation assistance is important.
- How to identify customers who may need translation services.
- Standards for helping LEP customers using the various channels within the 311 Contact Center that include telephone, face-to-face, mobile app, social media, email, web, letters/fax, etc.

- How to document language assistance needs using the customer relationship management (CRM) system.
- Communicating language needs to servicing departments (requires CRM enhancement).
- Translation procedures for oral and written interactions including authorized resources.
- Process for handling requests/documents that are not be available in customers' needed language.
- List of City and departmental resources for translation assistance and criteria for using specified resources.
- Handling customer complaints related to denial of translation services including the escalation process.

iv. Initial and Annual Training

- Within 30 days of adoption of the 311 Language Access Plan, training will be provided to any employee who has not received training within the past twelve months. Thereafter, training will be provided on an annual basis to all 311 employees.
- Annual training will be managed by the 311 Continuous Improvement Specialist and added to the training calendar.
- Newly hired employees will receive training within 10 days of their start date.
- Employee participation will be documented using sign in sheets/certificates of completion.
- Hard copy of the most current 311 Language Access Plan will be given out and an electronic copy will be made available for employees' reference in a centralized location.

v. Additional Training

- Additional training will be provided to employees who have been validated as interpreters for the 311 Contact Center. Training will include standards for translating on behalf of LEP customers.
- Employees whose positions/responsibilities require them to have frequent public interaction will receive additional training related to their roles such as social media posts, written responses to customer inquiries, etc.

ADMINISTRATIVE HEARINGS

This section is not applicable to the 311 Contact Center.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

A. Current

Posters notifying Limited English Proficiency (LEP) customers of the availability of free telephonic language translation services and how to access are available in the 311 Walk in Center. The message is available in 21 languages; Arabic, Armenian, Cambodian (Khmer), Cantonese, Chinese, English, French, German, Hindi, Hmong, Italian, Japanese, Korean, Laotian, Mandarin, Polish, Portuguese, Russian, Spanish, Tagalog, Thai, and Vietnamese.

B. Future

- a. Obtain and display posters/flyers that provide better visibility to LEP customers advising them of the availability of free telephonic language translation services and how to access.
 - i. Poster/flyer will be available in the most popular languages spoken within Philadelphia.
 - ii. Message will contain simple language such as *“Free interpreter services are available, please ask for assistance.”*
- b. Obtain language access information cards translated in most popular languages spoken in Philadelphia to be used at community events and in the Walk in center.
- c. Working with the Office of Immigrant Affairs and the Office of Information Technology post information on 311 website notifying the public about free translation assistance.
- d. Develop social media posts to advise public of free translation assistance.
- e. When available use bilingual staff to assist at community events.

7. DATA COLLECTION AND ANNUAL REPORT

- A. Using the Customer Relationship Management (CRM) system the 311 Contact Center collects the following data related to Limited English Proficiency (LEP) customer interactions.
 1. Total number of LEP interactions.
 - i. By all languages
 - ii. By specific languages

2. Types of services requested by LEP customers; breakdown of all and specific languages.
 - i. Directory Assistance
 - ii. Information Request
 - iii. Service Request
 - iv. Number of bilingual staff
3. Number of staff trained in Language Access/Cultural Competency
4. Language services expenses

B. Data Collection Methodology

Using the CRM system, agents are required to document language assistance needs.

1. Agents are required to indicate whether customers need language assistance.
2. Agents select the language spoken by the customer using the CRM system.

C. Reporting

1. Annual reporting will include data identified in number 1 of this section.
2. Periodic reporting will need to be provided as needed.

D. Analysis

1. Data results will be reviewed on an annual basis and will include.
 - i. Comparisons year over year.
 - ii. Identify opportunities to improve access, outreach and/or staff training.
 - iii. Develop action plan for upcoming year.
 - Assess outcomes based on established plan.

E. Surveys – Future

1. Develop survey targeting LEP customers experience obtaining language assistance when interacting with staff in the 311 Contact Center.

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

A. Current

1. Knowledge base article (How do I make a complain about not receiving language assistance?) refers customers to Philadelphia Commission on Human Relations.
2. You may file a formal Language Access grievance with PCHR 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
Municipal Services Building
1401 JFK Blvd., 14th Floor, Suite 1430
Philadelphia, PA 19102
E-Mail: orlando.almonte@phila.gov

B. Future

1. Current knowledge base article will be updated to make relevant information available to the public.
2. Work with the Office of Immigrant Affairs to create an article related to filing complaints through their office.
3. Knowledge base articles related to language access complaints will be available on the 311 website and via the mobile app.
4. Review and update existing knowledge base articles annually.
5. Work with the Office of Immigrant Affairs to create a process to handle complaints received via the 311 Contact Center (12-24 months to implement).

9. TIMELINE FOR IMPLEMENTATION

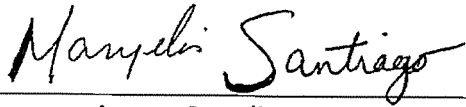
- A. Major milestones in our plan will include:
- a. Implement Plan
 - b. Collect first year data
 - c. Train frontline responders
 - d. Set up systems to collect data
 - e. Public translated documents

Timeline

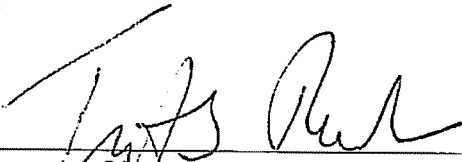
2017

- Complete and submit Language Access Plan to the Office of Immigrant Affairs
- Begin implementation of Language Access Plan
- Set up systems to collect data
- Explore training opportunities for staff
- Public translated documents
- The agency will adjust and update this plan as needed.
- Complete annual report

10. SIGNATURE PAGE



Language Access Coordinator
Maryelis Santiago
311 – Managing Director’s Office



Executive Director
Tim Thornton
311 – Managing Director’s Office