

OFFICE OF ADULT EDUCATION
LANGUAGE ACCESS PLAN & PROTOCOL
2017

1. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Office of Adult Education 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 Office of Adult Education 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 ensure access to high-quality basic education for all adult learners in Philadelphia.

2. GENERAL POLICY

- A. Office of Adult Education serves a population that includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of Adult Education to ensure meaningful access to LEP individuals. The Office of Adult Education adopts the following policy to ensure that LEP individuals can gain equal access to the Office of Adult Education services and communicate effectively.
- 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 Office of Adult Education intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of Adult Education seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

C. Responsibility Statements

- The department, rather than the LEP customer, bears the responsibility for providing language appropriate services. Staff at the initial point of contact have the specific duty to identify and record language needs.
- Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged. Minor children are prohibited from acting as interpreters.
- No staff may suggest or require that an LEP customer provide an interpreter to receive services

D. Preferred Method of Service:

- The Office of Adult Education recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of Adult Education to ensure meaningful access to LEP individuals. The Office of Adult Education adopts the following policy to ensure that LEP individuals can gain equal access to the Office of Adult Education's services and communicate effectively. This plan applies to all the Office of Adult Education offices and sub-contractors.
- The Office of Adult Education currently has employees who are fluent in Spanish, which is also the language other than English, most commonly spoken by our LEP clients.
- Our bilingual staff are also used for in-person or telephone interpreting to support other staff.
- The Office of Adult Education shall seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs.
- Staff at the initial point of contact will be trained to identify and record language needs and they will be authorized to provide language services even if such assistance is not requested by the customer.

3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE

Language Access Coordinator

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Executive Director

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4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Office of Adult Education has several points of contact with the public:

- The primary point of contact is the telephone. Clients will call requesting to be enrolled in English as Second Language (ESL) classes. If they speak Spanish, we can accommodate them. It

is our intention to use telephonic interpretation if the language they speak is other than English or Spanish.

- Office walk ins – Several times a year, LEP’s may walk into our office. In these instances, if there are no bilingual staff able to interpret, staff shall use telephonic interpretation.

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

- **Services Provided**

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

1.) Protocols

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.

2.) 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 Office of Adult Education 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 XXX-XXX-XXXX and provide the following information when greeted by a coordinator:

- Department name, division, account code
- (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 –

Staff can request an in-person interpreter by contacting the 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
- 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.)

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.) Protocols for Document Translation

a.) **Informational Fliers** - The Office of Adult Education provides access to English as a Second Language classes to citizens of Philadelphia. We will have fliers printed in the most common languages, other than English, with directions on how to access our services.

b.) Procedure for Submitting a document for translation:

- a. Email the editable document to Office of Immigrant Affairs – Language Access Program Manager at Orlando.almonte@phila.gov
- b. OIA will submit the translation request to translation vendor to obtain a quote.
- c. OIA will email you a quote with a time estimate for delivery of the translation.
- d. Quote must be authorized by an authorized person.
- e. Quote is then signed and emailed back to OIA.
- f. OIA will email you the translated documents.

c.) Website

- a. The Office of Adult Education website contains information about the entire range of The Office of Adult Education programs and activities.
- b. The Office of Adult Education will identify the most important information for LEP's and have it translated into the most common languages, other than English that our clients speak and attach it to the website as PDF documents
- c. Tag lines will be included in the website that explain that LEP individuals can obtain a translation of documents or that interpretation is available in our office.

C. BILINGUAL STAFF

1.) Current Staff

The Office of Adult Education has two staff members who are fluent in Spanish and can speak to walk-ins and people who call. Clients who speak Spanish are by far the greatest number of LEP's who contact our office.

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

(a) Training Protocol

- a. The Office of Adult Education's Language Access Plan & Protocol will be part of the staff handbook, posted on the intranet, and provided as a hard copy to all The Office of Adult Education staff members at hiring.
- b. The Office of Adult Education's will distribute the LEP plan to all staff and will have a current electronic copy available so all staff will be knowledgeable of LEP policies and procedures.
- c. All staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.
- d. LEP training will include information on the following topics:
 - Legal obligation to provide language assistance;
 - LEP plan and protocols;
 - Identifying and responding appropriately to LEP individuals;
 - Documenting LEP individuals' language preference;
 - Obtaining interpreters (in-person and over-the-phone);
 - Using and working with interpreters (in-person and over-the-phone);
 - Translating procedures;
 - Documenting language requests; and
 - Using or not using bilingual staff as in-house interpreters.
- e. The Office of Adult Education will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, The Office of Adult Education will circulate the revised policy and protocols to all staff after adoption. Within 12 months of the adoption of this policy, The Office of Adult Education will provide cultural competency training, including training regarding 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 12 months of the beginning of their employment with The Office of Adult Education. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

- f. 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 The Office of Adult Education'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.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1. Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.
2. Tag lines will be included in or attached to a document. Taglines in languages other than English can be used on documents written in English that describe individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. Contact the office of Immigrant Affairs for support in creating tag lines.
3. In all areas of public contact and on its website, The Office of Adult Education will post and maintain clear and readable signs in the languages most prevalent in the City notifying LEP individuals that free translation and interpretation services are available to them.

7. DATA COLLECTION AND ANNUAL REPORT

Data Collection

- The Office of Adult Education will begin to collect data on the number of phone calls and walk-ins who need translation services
- The Office of Adult Education can provide demographic reports on all the learners who apply for English as a Second Language classes in our student information system. We can also use this system to collect data on the original language of our clients.
- The Office of Adult Education will assist our contractors with also implementing the procedures outlined in this plan and monitor their progress
- The Office of Adult Education will utilize The Office of Immigrant Affairs' data collection template where appropriate

Annual Report/Evaluation

- The plan should include a method for developing performance measures appropriate to the department Language Access Plan and Policy and department operations.
- The plan should provide for a system of measuring performance against these measures, which may include the periodic surveying of LEP customers and evaluation of services provided.

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 JFK Blvd. Suite 1430
Philadelphia, PA 19107
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 form and for more information, please visit www.phila.gov/humanrelations

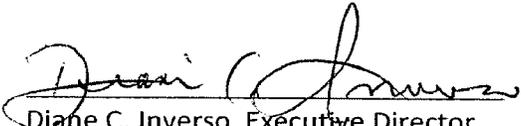
9. TIMELINE FOR IMPLEMENTATION

- a. The Office of Adult Education will begin identifying what information should be translated into other specific languages and complete this by FY18.
- b. The Office of Adult Education will circulate plan to staff and begin trainings in Spring of 2017.
- c. By July of 2017, The Office of Adult Education expects to have documents translated and in place.
- d. By January 31st of 2017 expects to have their website updated.

10. SIGNATURE PAGE



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