

**Philadelphia Water Department:**  
**Language Access Plan**  
(Updated 2017)

## **PURPOSE AND AUTHORITY**

In cooperation with the Mayor's Office, the Philadelphia Water Department (PWD) is committed to compliance with Title VI of the Civil Rights act of 1964, 2 C.S. & 561 et seq. (Act 172 of 2006) the Philadelphia Home Rule Charter & 8-600 and & A-200, Executive Order 7-16 and revised and updated Managing Director Directive 62, 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 PWD 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 serve the Greater Philadelphia region by providing integrated water, wastewater, and stormwater services. The Philadelphia Water Department plans for, operates, and maintains both the infrastructure and the organization necessary to purvey high-quality drinking water to provide an adequate and reliable water supply for all household, commercial, and community needs, and to sustain and enhance the region's watersheds and quality of life by managing wastewater and stormwater effectively.

The Philadelphia Water Department recognizes the importance of effective and accurate communication between its employees and the communities we serve and will accomplish our language access goals primarily through services provided by City-contracted language access vendors in the areas of telephonic and in-person interpretation and document translation.

The Philadelphia Water Department will continually work with community stakeholders to evaluate its services and identify ways to refine and/or expand them. As a result, we expect these strategies, services and programs to evolve over time.

## GENERAL POLICY

The Philadelphia Water Department (PWD) recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of PWD to ensure meaningful access to LEP individuals. PWD adopts the following policy to ensure that LEP individuals can gain equal access to PWD services and communicate effectively. This Plan applies to all PWD 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. PWD intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. PWD seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

PWD, rather than the LEP customer, bears the following responsibilities:

1. Providing language appropriate services.
2. Staff at the initial point of contact have the specific duty to identify and record language needs.
3. Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged.
4. Minor children are prohibited from acting as interpreters.
5. No staff may suggest or require that an LEP customer provide an interpreter in order to receive services

The preferred method of serving LEP persons is by:

1. Staff should seek assistance from professional in-person or telephonic interpreters and translation services when staff cannot meet language needs.
2. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.
3. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.

## **LANGUAGE ACCESS COORDINATOR**

The Philadelphia Water Department has appointed a Language Access Coordinator to implement and monitor its language access services. This representative serves as a liaison between the Water Department and the Office of Immigrant Affairs to communicate with LEP communities through established organizations.

### **Language Access Coordinator**

Laura Copeland  
Public Information Officer  
Philadelphia Water Department  
1101 Market Street  
Aramark Tower, 3<sup>rd</sup> Floor  
Philadelphia, PA 19107  
Office: 215-685-4902  
Cell: 215-300-9208  
[Laura.copeland@phila.gov](mailto:Laura.copeland@phila.gov)

### **Language Access Coordinator (Alternate)**

Tiffany Ledesma  
*Green City, Clean Waters* Engagement Team Manager  
1101 Market Street  
Aramark Tower, 3<sup>rd</sup> Floor  
Philadelphia, PA 19107  
[Tiffany.ledesma@phila.gov](mailto:Tiffany.ledesma@phila.gov)

### **Commissioner**

Debra A. McCarty  
Philadelphia Water Department

## **DIRECT CONTACT WITH (LEP) INDIVIDUALS**

The Philadelphia Water Department (PWD) has several points of contact with the public:

- Customer Information Hotline – PWD uses a 24-hour telephone information hotline for customers to report emergencies, request services and information, in partnership with the Water Revenue Bureau. In these instances, staff uses telephonic interpretation.
- Field units – PWD field staff, including Customer Services, Distribution, Sewer Maintenance, Inlet Cleaning and Construction, often interact with the public to alert them of service interruptions, repair work or other emergency-related construction work that may require language access services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
- Document Translation Services – PWD uses several documents to communicate important information to customers about our goals, requirements, updates and services. PWD shall, through the Office of Immigrant Affairs, provide translations of key informational material and forms.
- Meetings/Information Sessions - At times, PWD will hold meetings or information sessions. If language access services are anticipated, PWD will utilize in person interpretation for the appropriate language.
- Office walk ins – There are times when Limited English Proficient (LEP) individuals come into PWD's office looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.

## LANGUAGE ACCESS SERVICES AND PROTOCOLS

### A. Interpretation

#### 1.) Services Provided

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

#### 2.) Protocols

- a. To ensure that the inability to communicate in English does not deprive the public of rights and privileges, PWD will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:
  - An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
  - 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 a request for an interpreter is made either orally, in writing or by pointing to a language card, the employee shall provide telephonic interpretation in the language requested.

#### 3.) Procedures

- a. When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services using the process outlined below:

- Telephonic Interpretation

Over-the-phone interpreters can be accessed by calling the following vendor: Language Line Solutions. This service is available 24/7.

To submit a request, call 1-800-874-9426 and provide the following information when greeted by a coordinator:

1. 6-digit Client I.D.
2. Select Language
3. Payroll Number

- b. When a Limited English Proficient (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

Requests for an in-person interpreter can be made by emailing PWD's Language Access Coordinator at [laura.copeland@phila.gov](mailto:laura.copeland@phila.gov).

The Language Access Coordinator will then arrange interpretation services through the 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.

The Language Access Coordinator can also submit a request online, at: [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 for 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

- a. Use telephonic interpretation, and ensure that the public knows about the availability of these services. PWD 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. PWD can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. PWD 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.

## B. Translation

### 1.) Services Provided

- a. 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 Limited English Proficient (LEP) individuals. This includes translations of vital documents, signage and portions of our website.

### 2.) Protocols

- a. PWD has developed a list of the documents that are vital to the access of LEP persons to PWD's programs. Documents have also been identified that may contain important information and will contain noticing of PWD language access services and how to obtain services. PWD currently provides some vital documents in the following languages: Spanish, Chinese, Vietnamese, Cantonese, Portuguese, Russian, Korean, Cambodian, Polish and Albanian. Vital documents that have been translated include:

1. 2016 Water Quality Report
2. 2016 Rate Increase Fact Sheets
3. Lead Program Fact Sheets and Materials
4. Construction letters and door hangers
5. Industrial Waste Warning and Violation Notices
6. Intensive Cleaning/Rinse Lead from Service Pipe (Top 10 Languages)
7. Daily Cleaning Tips/Faucet Aerators (Top 10 Languages)
8. Check Distribution Line for Lead (Top 10 Languages)
9. Alert – Your Homes Water Pipe is Made of Lead (Top 10 Languages)
10. H.E.L.P. Loan Fact Sheet
11. Basement Protection Program Materials
12. Plumbing Repairs Program Materials

### 3.) Procedures for submitting a document for translation

- a. Email the document to the Language Access Coordinator (LAC) – [laura.copeland@phila.gov](mailto:laura.copeland@phila.gov)
- b. The LAC will submit the translation request to the Office of Immigrant Affairs (OIA) for the translation vendor to obtain a quote.
- c. OIA will email the LAC a quote with a time estimate for delivery of the translation.
- d. Quote must be authorized and signed by the LAC and emailed back to OIA.
- e. OIA will email the LAC the translated documents. The LAC will contact the requestor with the translated documents.

#### 4.) Signage

- a. The Office of Immigrant Affairs has provided signage alerting Philadelphia Water Department customers that interpretation services are available at customer contact locations.

#### 5.) Website

- a. PWD's website contains information about the entire range of PWD programs and activities. Currently the following information and materials are available on the website in multiple languages:
  1. 2016 Water Quality Report
  2. 2016 Rate Increase Fact Sheets
  3. Lead Program Fact Sheets and Materials
  4. Intensive Cleaning/Rinse Lead from Service Pipe (Top 10 Languages)
  5. Daily Cleaning Tips/Faucet Aerators (Top 10 Languages)
  6. Check Distribution Line for Lead (Top 10 Languages)
  7. Alert – Your Homes Water Pipe is Made of Lead (Top 10 Languages)
- b. PWD will continue to translate additional select documents and make them available through the website, newsletter, and/or community engagement meetings and other events. PWD will periodically review our webpages with the goal of improving its accessibility to LEP persons. This includes identifying the most important information to be translated and the best means for disseminating translations to LEP communities.
- 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.

#### 6.) Future Plans

##### Language Access Goals:

Write public materials in plain English, and translate extensively. PWD's Language Access Coordinator will work with PWD managers to continue to edit all public materials for plain language and to extensively translate important agency documents and education materials.

Translation services are centralized through PWD's Public Affairs Division to ensure that translations are clear and consistent.

PWD's Public Affairs Division has a budget for translation services in order to encourage broad translation of public materials, even if individual program budgets are limited, and to ensure that translations are done by a professional linguist. PWD's Language Access Coordinator will continue to make these resources widely known throughout the Department and will continue to enforce agency protocols that support high-quality translations.

### C. Bilingual Staff

- 1.) The Language Access Coordinator will work with PWD managers and staff to identify bilingual staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.
- 2.) Future Plans  
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 by:
  1. Include the language skills as a "desirable" qualification in job announcements. 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 and/or interpreting/translation ability; and certification, transcripts, diplomas or other evidence of language proficiency in English and/or other language;

### D. Training Staff on Protocols and Procedures

- 1) Protocol
  - a. The Philadelphia Water Department will have a current electronic copy available on its intranet and hard copies will be made available upon request, so all staff will be knowledgeable of LEP policies and procedures.
  - b. All staff providing technical assistance, training or receiving in-bound calls will receive annual Limited English Proficient (LEP) training, or training upon employment, on how to use and obtain services. Refresher training will available every two years.
  - c. LEP training will include information on the following topics:
    - Legal obligation to provide language assistance;
    - LAP 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 Philadelphia Water Department (PWD) will alert all staff to the availability of this language access policy and related protocols within 30 days after adoption.

Every three years, or as necessary, PWD will alert all staff of the revised policy and protocols after adoption.

Within nine months of the adoption of this policy, PWD 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 who have regular interaction with LEP individuals, will receive cultural competency training within six months of the beginning of their employment with PWD. After their initial training, all staff members who have regular interaction with LEP individuals, will received refresher training in cultural competency and language access every three years.

- e. In order to establish meaningful access to information and services for Limited English Proficient (LEP) individuals, staff that regularly interact with the public and those who will serve as in-house interpreters will be trained on PWD'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 PWD's Language Access Plan and Protocols and provide guidance on how to effectively communicate with LEP residents.

## 2.) Future Plans

- a. Further standardize language access resources and tools across PWD. PWD's Language Access Coordinator will work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available at sites.

Another goal is to update and refresh PWD's Volunteer Language Database of staff who speak languages other than English and who are willing to help review translated materials and/or assist with interpretation in emergencies.

In addition, PWD's Language Access Coordinator will update our Language Access Toolkit, an internal resource for staff and will meet with Department employees to share challenges and best practices.

- E. Administrative Hearings – PWD does not currently conduct Administrative hearings.

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

Posters notifying Limited English Proficient (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.

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 how individuals with LEP can obtain document translations or an interpreter to read or explain the document. PWD will contact the office of Immigrant Affairs for support in creating taglines.

The Office of Immigrant Affairs has provided signage alerting Philadelphia Water Department customers that interpretation services are available at customer contact locations.

In addition, the Philadelphia Water Department has integrated the City's language layer in its GIS mapping system to identify the different languages spoken in the neighborhoods in Philadelphia to enable us to plan ahead for community meetings and/or outreach materials.

## DATA COLLECTION AND ANNUAL REPORT

The following information will be required to be monitored and collected by departments and will be collected via annual reports by the Office of Immigrant Affairs:

- (1) Number of Limited English Proficient (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:

- (5) Number of bilingual staff
- (6) 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.

The plan should include a method for developing performance measures appropriate to the department Language Access Plan and Policy and department operations.

### Annual Report/Evaluation

1.) The Philadelphia Water Department 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 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.) PWD's Customer Information personnel 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. If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.

- b. PWD'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 PWD's Language Access Coordinator and incorporated into an 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.

## **LANGUAGE ACCESS COMPLAINT PROCESS**

Customers may file a formal Language Access grievance with the Office of Immigrant Affairs if they believe they have been wrongly denied the benefits of this Language Access Plan. One must file their 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

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).

## **TIMELINE FOR IMPLEMENTATION**

### Implementation Plan Logistics

Major milestones in PWD's plan will include:

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

### **Timeline through December 2016**

- PWD will continue to broadly translate materials and provide on-site interpretation as needed, and to track these activities.

The Language Access Coordinator will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.

- The Language Access Coordinator will update PWD's internal protocols for written translations and in-person interpretations, respectively.
- The Language Access Coordinator will meet with front-line PWD staff to discuss language access challenges, best practices and methods for tracking language access data by program/site, and brainstorm ideas for new or updated language access resources these staff might need.
- The Publications and Language Access group will update its internal glossaries as needed.
- PWD will work closely with the Office of Immigrant Affairs and will communicate with other City agencies about best practices, tools that can be shared and challenges.

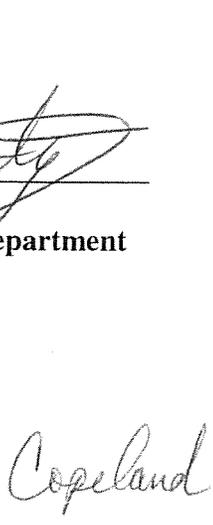
### **2017**

- The Language Access Coordinator 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 Language Access Coordinator will explore ways to track and certify PWD 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 Volunteer Language Database. The agency will evaluate alternative training and certification resources for these volunteers.
- The Publications and Language Access group will work with other groups in the agency to coordinate plain language and/or cultural competency trainings.

**SIGNATURE PAGE**

  
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Commissioner  
Philadelphia Water Department

4/7/17  
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Date

  
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Language Access Coordinator  
Public Information Officer  
Philadelphia Water Department

4/7/17  
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