

# **DEPARTMENT OF REVENUE**

## **LANGUAGE ACCESS PLAN & PROTOCOL**

### **1. PURPOSE AND AUTHORITY**

In Cooperation with the Mayor's Office, the Department of Revenue 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 Department of Revenue 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 collect a variety of tax and non-tax revenue due to the City and tax revenue due to the School District of Philadelphia promptly and efficiently by increasing on time payments and decreasing delinquency.

### **2. GENERAL POLICY**

The Department of Revenue recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Department of Revenue to ensure meaningful access to LEP individuals. The Department of Revenue adopts the following policy to ensure that LEP individuals can gain equal access to Department of Revenue's services and communicate effectively. This Plan applies to all Department of Revenue 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 Department of Revenue intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Department of Revenue 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 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 services, 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.

**B. Preferred Method of Service:**

1. Using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.
2. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
3. Staff should seek assistance from professional in-person or telephonic interpreters when staff cannot meet language needs.
4. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (for example, situations concerning HIPAA, confidentiality or anything that may have a legal implication). Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

### 3. LANGUAGE ACCESS COMMITTEE

***Language Access Coordinator***

Jessica Varela

Chief Fiscal and Administrative Officer  
City of Philadelphia Department of Revenue  
Municipal Services Building, Room 430

Direct: (215) 686-6407

Jessica.Varela@phila.gov

***Language Access Committee***

Sharee Cain (Tax Revenue Bureau) – (215) 686-4930

Brian Mera (Law Revenue Bureau)- (215) 686-0585

Lawrence Taylor (Water Revenue Bureau)- (215) 686-6838

### 4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Department of Revenue has several points of contact with the public:

- A. Office- Customers come to the Department of Revenue on a daily basis seeking assistance for various services; including, assistance programs, current and delinquent payments and payment agreements. In these instances, if there are no bilingual staff available to interpret, staff uses telephonic interpretations. Various locations include:

**Municipal Services Building**  
1401 John F. Kennedy Boulevard  
Concourse Level  
*Office Hours: Monday-Friday (8:30 a.m. – 5:00 p.m.)*

**North Philadelphia- Tax & Water Revenue**  
Hope Plaza  
22<sup>nd</sup> & Somerset St.  
*Office Hours: Monday-Friday (8:30 a.m. – 5:00 p.m.)*

**Northeast Philadelphia- Tax & Water Revenue**  
7522 Castor Ave.  
*Office Hours: Monday-Friday (8:30 a.m. – 5:00 p.m.)*

- B.** Field- Revenue Investigators and Revenue Examiners work in the field. Investigators conduct field enforcement work investigating tax and water sewer delinquents for collection of revenue. Revenue Examiners conduct field audits of the accounting and other financial records of businesses and individuals to determine tax liability. The department will work with the Office of Human Resources and Chief Administrative Office to recruit, test, and hire bilingual field employees.
- C.** Call Center - residents of Philadelphia call our call center during business hours to pay their bills or for questions regarding notices that they have received in the mail.

## 5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

### A. INTERPRETATION

#### 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 an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

#### 2) **Protocols**

- 1) 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) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services.

## Telephonic Interpretation

The Department of Revenue can get an over-the-phone interpreter by calling the following vendor: Language Line. This service is available 24/7. To access an interpreter:

- Dial 1-866-XXX-XXXX
- Provide the Client ID
- Indicate the language needed

### **3) Future Plans**

#### Language Access Goals:

**Use telephonic interpretation, and ensure that the public knows about the availability of these services.** The Department of Revenue will consult with the Office of Immigrant Affairs, which makes telephonic interpretation services available in its main office through Language Services Associates. The telephonic interpretation service is available in over 170 languages. The Department will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on using telephonic interpretation services. The Language Access Coordinator will work closely with the Office of Immigrant Affairs to identify resources that will be beneficial for LEP individuals.

**In-person interpretation services.** The Department of Revenue can offer in-person interpretation for scheduled appointments and meetings as needed through Nationalities Service Center if given enough notice. The Department of Revenue will continue to inform the public about these resources through social media, visible multilingual signs and will train its entire staff on requesting in-person interpretation services.

## B. TRANSLATION

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.

### **1) Vital documents**

- a. Information on most assistance, payment plans and discounts are available in Spanish online and in print. Example includes water bills, tax and other revenue collections documents.
- b. Flyers:
  - Active Duty Tax Credit (Spanish)
  - Real Estate Tax Deferral Program (Spanish)
  - Real Estate Installment Program (Spanish)
  - Owner-Occupied Payment Agreement Program (Spanish)

- Senior Citizen Tax Freeze Program (Spanish)
  - Senior Citizen Discount (Spanish)
  - WRAP (Spanish)
  - Homestead Exemption (Spanish)
  - Taxpayer Resources and Programs (Arabic, French, Haitian Creole, Italian, Portuguese, Russian, Simplified Chinese, Spanish, Vietnamese)
  - EITC (Spanish, French, Vietnamese, Traditional Chinese, Russian, Portuguese, Korean, Khmer)
- c. Applications:
- Homestead (Spanish, Chinese)
  - LOOP (Spanish)
- d. Homestead, LOOP and EITC programs- Information is available in multiple languages online.
- e. EITC website – FULL TRANSLATION (English, Spanish, French, Vietnamese, Chinese, Khmer)

2) Procedure for Submitting a document for translation:

- a. Email the editable document to the Language Access Coordinator- Jessica Varela at [Jessica.Varela@phila.gov](mailto:Jessica.Varela@phila.gov).
- b. The Language Access Coordinator will submit the document to the Office of Immigrant Affairs (OIA) – Language Access Program Manager at [Orlando.almonte@phila.gov](mailto:Orlando.almonte@phila.gov) for review.
- c. OIA will submit the translation request to translation vendor to obtain a quote.
- d. OIA will email you a quote with a time estimate for delivery of the translation.
- e. Person with authority must authorize quote.
- f. Quote is then signed and emailed back to OIA.
- g. OIA will email you the translated documents.

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

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

3) Signage

- a. The Revenue Department will translate and display current signage of the services offered by the department to better inform LEP customers of the services available to them.

4) Website

- a. The Department of Revenue will take proper measures to ensure that the department’s website provides important documents and resources necessary for LEP individuals who need assistance with the department’s services.
- b. The Department of Revenue will take the following steps:
  - I. The Department shall take reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.
  - II. The Department will be wary of Google translate and not use it as a permanent solution to translation.
  - III. The Department will identify areas on the website where taglines are appropriate.

5) Future Plans

- a. Write public materials in plain English and translate extensively. The Department of Revenue has allocated funding for language services, which will be used on translations of public materials and vital documents. The Department of Revenue will implement a process involving community feedback to determine which languages are in higher demand to best accommodate the LEP community.

C. BILINGUAL STAFF

1) Current Staff

- a. This list identifies the languages spoken by the Department of Revenue staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to service as interpreters if available.

Spanish	French	Hindi	Malayalam	Gujarati
Chinese	Yoruba	Marathi	Vietnamese	Creole
Dutch	Italian	Portuguese	Greek	Arabic
Afrikaans	Baoule’	Yiddish	Tamil	Medumba
Finnish	Russian			

2) Future Plans

- a. Hiring – Hiring decisions are based on City departments’ business needs as interpreted by department heads, including language service needs. Language service needs will be addressed by including language skills as a “desirable” qualification in job announcements. The Department of Revenue will work with Office of Human Resources and Chief Administrative Officer to recruit, test, and hire bilingual employees.

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

### 1) Training Protocol

- a. The Department of Revenue Language Access policies will be part of the staff handbook, posted on the intranet, and provided as a hard copy to all Revenue staff members at hiring.
- b. The Department of Revenue will distribute the Language Access Plan to all staff and will have a current electronic copy available so that all staff will be knowledgeable of language access 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. Language Access 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 Department of Revenue will circulate this language access policy and related protocols to all staff within 45 days after adoption. Every two years, the department of Revenue will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, the Department of Revenue will work towards providing cultural competency training, including training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with LEP individuals. All new staff members will receive cultural competency training within one year of the beginning of employment with the Department of Revenue. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.
- f. In order to establish a 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 Department of Revenue's LEP policy, plan, 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.
- g. Orientation- New staff will be provided the Department of Revenue Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

## 2) Future Plans

- a. The Department of Revenue will work with the Office of Immigrant Affairs to provide bilingual employees with formal interpretation training and expand training opportunities on plain-language and cultural competency topics. The department will develop a training throughout the year.

## E. ADMINISTRATIVE HEARINGS

Currently, the Department of Revenue holds informal water rate hearings and commercial activity license hearings. At this time, the department has not identified other administrative hearings.

### 1) Protocol

- a. The Revenue Department will provide a trained legal interpreter for any hearing that an LEP individual requests language assistance with at least three business days' notice.
- b. Once a request for an interpreter has been made, a formal request for an in-person interpreter will be sent to a vendor. If an in-person interpreter is not available, a telephonic interpreter will be provided.

### 2) Future Plans

- a. An effort will be made to provide simultaneous interpretation over consecutive interpretation.
- b. A protocol will be put in place that will identify whether a resident is LEP prior to the hearing in order to plan accordingly for an interpreter.

## 6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

1. Posters notifying LEP individuals of their right to language services will be developed and displayed in areas of public contact. These posters will contain a simple message - such as 'Free Interpreter services are available. Please ask for assistance.' - and will be in English as well as the principle languages spoken in the service area.
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. 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.



4. In all areas of public contact and on its website, Department of Revenue 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 front-line staff and will be aggregated via quarterly reports by the Department of Revenue:

1. Number of LEP encounters (By Language), ASL encounters, when they occurred and total time of interaction
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 Department of Revenue will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of stated goals and identify new goals or strategies for serving LEP residents. The Language Access Committee will lead the evaluation with the assistance of the Language Access Coordinator and the Office of Immigrant Affairs. 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.
- 1) The Department of Revenue intake personnel will record each person's language of choice in electronic format to ensure that staff can use the information and the language access coordinator can track the data.
    - a. If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.
    - b. The 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.

- 2) Evaluation results and recommended changes will be shared by the Language Access Coordinators 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 Department of Revenue 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 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](mailto: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)

## 9. TIMELINE FOR IMPLEMENTATION

Implementation Plan Logistics

Major milestones in our plan will include:

- Updating agency language access tools and resources
- Exploring additional training opportunities

- Establish Language Access Committee

Timeline:

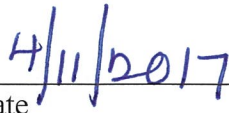
FY2017- FY2018

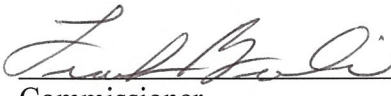
- Implement language access protocol, utilizing telephonic and in-person interpretation as needed
- Have all current vital documents translated and publicly available
- Assess if other documents should be translated
- Train employees in Language Access and Cultural Competency
- Provide public notice of available language services through use of posters and flyers available in our main office
- Assess current Language inventory with the employees
- Review any Language Access comments or complaints and determine possible changes
- Review Language Access Report and assess data and use to make further changes to the Language Access Plan
- Agency will adjust and update this plan as needed
- Work outlined in 2016 will continue

10. SIGNATURE PAGE

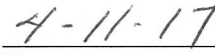
  
\_\_\_\_\_  
Language Access Coordinator

**Jessica Varela**  
**Department of Revenue**

  
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Date

  
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Commissioner

**Frank Breslin**  
**Department of Revenue**

  
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Date