



Language Access Plan & Protocol

2017

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I. PURPOSE AND AUTHORITY

In cooperation with the Mayor's Office, the Office of Civic Engagement and Volunteer Service 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 the Office of Civic Engagement and Volunteer Service 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 vision and mission, which is to invest in people for sustainable outcomes. We do this by building relationships, connecting to resources and supporting the process to achieve a shared vision for a more prosperous Philadelphia.

II. GENERAL POLICY

- A. The Office of Civic Engagement and Volunteer Service recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of Civic Engagement and Volunteer Service to ensure meaningful access to LEP individuals. The Office of Civic Engagement and Volunteer Service adopts the following policy to ensure that LEP individuals can gain equal access to the Office of Civic Engagement and Volunteer Service services and communicate effectively. This Plan applies to all Office of Civic Engagement and Volunteer Service offices and satellite offices.
- 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 Civic Engagement and Volunteer Service intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of Civic Engagement and Volunteer Service seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. The Office of Civic Engagement and Volunteer Service, rather than the LEP customer, bears the responsibility for providing language appropriate services. Staff at the initial point of contact have the

specific duty to identify and record language needs. Use of informal interpreters such as family, friends of the person seeking service, or other customers must be discouraged. Minor children are prohibited from acting as interpreters. No staff may suggest or require that an LEP customer provide an interpreter in order to receive services.

- D. The preferred method of serving LEP customers is by using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter. Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff. Staff should seek assistance from professional in-person or telephone interpreters when staff cannot meet language needs. Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available. Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the customer.

III. LANGUAGE ACCESS COORDINATOR

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Stephanie Monahon, Chief Service Officer

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IV. Direct Contact with LEP Individuals

The Office of Civic Engagement and Volunteer Service has several points of contact with the public due to the nature of the work that we do citywide. LEP individuals are in the communities that we serve and due to that fact, we have several bilingual staff members who are more than happy to interpret as needed. In the

event that a bilingual staff member is unavailable or does not speak the needed language, staff uses telephonic interpretation.

- A. Office Sponsored Events & Meetings (including but not limited to: CEAs, Service Summits, Resource Fairs, Workshop Series and Community Information Sessions)
- B. Community Sponsored Events & Meetings (including but not limited to: Community Meetings, Events, Programming)
- C. Obtaining Interest Forms
- D. 1:1 Meetings
- E. Conversations

V. Language Access Services and Protocols

A. Interpretation

a) Services Provided

- i. 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.

b) Protocols

- i. 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:
 - a. An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
 - b. 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.

c) Procedures

- i. 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:

- a. Telephonic Interpretation – The Office of Civic Engagement and Volunteer Service can get an over-the-phone interpreter by calling the following vendor: Language Services Associates. This service is available 24/7.
 - To submit a request, call 866-592-XXXX and provide the following information when greeted by a coordinator: *Department Code and Name*.
- ii. 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:
 - a. In-Person Interpretation – You can request an in-person interpreter by contacting the following vendor: Nationalities Service Center. This service is available 24/7, but please give more than 48 hours’ notice whenever possible. In an emergency, use a telephonic interpreter.
 - To submit a request online, contact the language access coordinator.

d) Future Plans

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

a) Services Provided

- i. 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.

b) Protocols

- i. 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 for LEP persons pursuant to the following procedures:
 - a. All documents that are frequently used will be translated, upon request.

c) Procedures

- i. The Office of Civic Engagement and Volunteer Service will adhere to the following:
 - a. Email the editable document to the 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 the quote with a time estimate for delivery of the translation.
 - d. Quote must be authorized by person with authority.
 - e. Quote is then signed and emailed back to OIA.
 - f. OIA will email you the translated documents.

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

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

d) Signage

- i. The Office of Civic Engagement and Volunteer Service currently does not have any translated signage.

e) Website

- i. The Office of Civic Engagement and Volunteer Service has a website that is not translated at the moment.

f) Future Plans

- i. The Office of Civic Engagement and Volunteer Service will work to have an inventory of readily accessible translated materials in the top five languages that our office interacts with on a regular basis. All other requests will be handled as they are received.
- ii. Signage and language access cards will be secured moving forward.
- iii. The Office of Civic Engagement and Volunteer Service website is currently under construction and the goal will be to have a multi-lingual link placed to link our constituents to translated documentation.

C. Bilingual Staff

- a) This list identifies the languages spoken by the Office of Civic Engagement and Volunteer Service staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters

NAME	PHONE	EMAIL	LANGUAGE(S)
Amanda Finch	(215) 686 - 3684	Amanda.Finch@Phila.Gov	French
Luz Paradoa	(215) 686 - 8410	Luz.Paradoa@Phila.Gov	Spanish
Evelyn Gutierrez	(215) 686 - 0278	Evelyn.Gutierrez@Phila.Gov	Spanish
Ana Polanco	(215) 686 - 0277	Ana.Polanco@Phila.Gov	Spanish
Nikki Drake	(215) 686 - 0317	Nikki.Drake@Phila.Gov	Spanish

- b) Our Future Plans for hiring appreciates multi-lingual capabilities and will take them into consideration when selecting staff, moving forward.

D. Training Staff on Protocols and Procedures

a) Protocol

- i. The Office of Civic Engagement and Volunteer Service’s Language Access Plan & Protocol is part of the staff handbook, posted on the intranet and provided as a hard copy to all Office of Civic Engagement and Volunteer Service staff members at hiring.
- ii. The Office of Civic Engagement and Volunteer Service 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.
- iii. All staff providing technical assistance, training or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually.
- iv. LEP Training will include information on the following topics:
 - a. Legal obligation to provide language assistance;
 - b. LEP plan and protocols;
 - c. Identifying and responding appropriately to LEP individuals;

- d. Documenting LEP individuals' language preference;
 - e. Obtaining interpreters (in-person and over-the-phone);
 - f. Using and working with interpreters (in-person and over-the-phone);
 - g. Translating procedures;
 - h. Documenting language requests; and
 - i. Using or not using bilingual staff as in-house interpreters
- v. The Office of Civic Engagement and Volunteer Service will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, the Office of Civic Engagement and Volunteer Service will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, the Office of Civic Engagement and Volunteer Service 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 will receive cultural competency training within six months of the beginning of their employment with the Office of Civic Engagement and Volunteer Service. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.
- vi. In order to establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public and those who will serve as in-house interpreters will be trained on the Office of Civic Engagement and Volunteer Service'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.
- vii. Orientation – New staff training will be provided on the Office of Civic Engagement and Volunteer Service's Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents
- b) The Office of Civic Engagement and Volunteer Service will continue to work on ensuring that all of its' staff members are versed in our Language Access Plan and that moving forward, our ability to assist LEPs will grow.

VI. Notice of the Right to Language Access

- A. Office of Civic Engagement and Volunteer Service will ensure that at all of our events, moving forward, appropriate signage will be displayed, informing LEP individuals of their right to language services. Our staff members who interact with the public will be supplied with language access materials and our website will allow access to key translated documents.

VII. Data Collection and Annual Report

- A. The Office of Civic Engagement and Volunteer Services will begin to gather the following information pertaining to our interaction with LEP individuals:
- i. Number of LEP interactions, sorted by language
 - ii. Type of Language Services provided to LEP residents
 - iii. Number of documents translated
 - iv. Language Service Expenditures
 - v. Number of bilingual staff
 - vi. Number of staff members trained in Language Access/Cultural Competency
- B. The Office of Civic Engagement and Volunteer Service 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:
- i. Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
 - ii. Assessment of data collected about the LEP's primary language.
 - iii. Assessment of the number and types of language requests during the past year.
 - iv. 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.
 - v. Assessment of complaint information; and
 - vi. Assessment of soliciting feedback from LEP individuals and community groups.

- C. The Office of Civic Engagement and Volunteer Service staff members will record each person's language of choice to ensure that the information can be used by staff and tracked by the language access coordinator.
- i. If the individual is Limited English Proficient, the person's language of choice will be noted for future interactions.
 - ii. The Office of Civic Engagement and Volunteer Service's Language Access Liaison 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.
- D. Evaluation results and recommended changes will be shared by the Office of Civic Engagement and Volunteer Service's Language Access Liaison and incorporated into annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600. The Language Access Coordinator will also keep records of any language access services provided and will make this information available during the annual review process. In connection with updates to the Language Access Plan, the Office of Civic Engagement and Volunteer Service may use some of the following tools to conduct further assessment:
- i. Request comments and feedback from residents that have received language services
 - ii. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

VIII. Language Access Complaint Process

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

IX. Timeline for Implementation

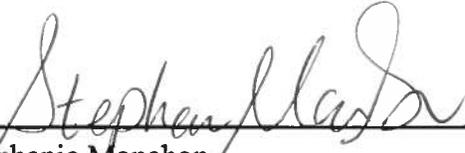
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- i. All needs will be assessed across the Office of Civic Engagement and Volunteer Service and all requisite signage and Language Access Cards and flyer translations will be identified
- ii. A training of all current staff members will be conducted
- iii. Baseline metrics will be gathered for annual report
- iv. All requisite signage, documentation and flyers will be translated and ready to be used

X. Signature Page



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