

# **LANGUAGE ACCESS PLAN**

Prepared by:  
The Office of Property Assessment  
215-686-9279

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# OFFICE OF PROPERTY ASSESSMENT LANGUAGE ACCESS PLAN & PROTOCOL 2016

## 1. PURPOSE AND AUTHORITY

“The purpose of this document is to establish an effective plan and protocol for Office Of Property Assessment 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 assure the fair, equitable, and uniform assessments of all real property in the City of Philadelphia for taxpayers, governmental entities, and other stakeholders by conducting valuations in accordance with industry standards and legal requirements, and by using our professional expertise and available resources.”

## 2. GENERAL POLICY

*This section explains the policy of the department. It is the commitment of the department and its employees to ensuring meaningful language access.*

- A.** *The Office of Property Assessment recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of Property Assessment to ensure meaningful access to LEP individuals. The Office of Property Assessment adopts the following policy to ensure that LEP individuals can gain equal access to The Office of Property Assessments ‘services and communicate effectively. This Plan applies to all of The Office of Property Assessments 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 Property Assessment intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of Property Assessment 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 has 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. Preferred Method of Service:**

- 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 staffs 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.

### **3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE**

Communications Coordinator  
 Salima Cunningham  
 Assessment Supervisor  
 City of Philadelphia Office of Property Assessment  
 Office of Property Assessment  
 601 Walnut Street, 3<sup>rd</sup> Flr  
 Direct: (215) 686-9279  
[Salima.Cunningham@phila.gov](mailto:Salima.Cunningham@phila.gov)

Director:  
 Michael Piper, AAS, CPE  
 Chief Assessment Officer  
 City of Philadelphia Office of Property Assessment  
 Office of Property Assessment  
 601 Walnut Street, 3<sup>rd</sup> Flr  
 Direct: (215) 686-9272  
[Michael.Piper@phila.gov](mailto:Michael.Piper@phila.gov)

## **4. DIRECT CONTACT WITH LEP INDIVIDUALS**

The Office of Property Assessment has several points of contact with the public including a call center that is contracted with the OPA.

- (1) Office walk ins- Several times a week LEP individuals come into OPA's office looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
- (2) Meetings/Information Sessions- at times OPA will hold meetings or information sessions. If language needs are anticipated, OPA will utilize in person interpretation for appropriate language.

## **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 individuals. Services offered include telephonic interpretation and in person interpretation.

#### **2.) 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.

### 3.) Procedures

- (1) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so is outlined below:

#### Telephonic Interpretation –

OPA 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 888-898-1480 and provide the following information when greeted by a coordinator:

- o Department name OPA and client ID number 585004

- (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 –

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, visit [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services)

- o Fill out service request form and be sure to select interpretation
- o 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.)

### 4.) Future Plans

- a. Use telephonic interpretation, and ensure that the public knows about the availability of these services. The Office of Property Assessment 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 and visible multilingual signs. OPA will train its entire staff on using telephonic interpretation services, and utilize OIA for additional training resources such as language phones, and vendors Rosales Communications and the Health Federation that also provide trainings tailored to departments based on their needs.
- b. Grow in-person interpretation services. The Office of Property Assessment can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. OPA 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

### 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.) Vital documents- Vital written documents include, but are not limited to: first level review form, catastrophic loss application, abatement application, appeal form (which is a form that must be turned in to the BRT. OPA has this document for consumers convenience) nonprofit exemption form, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses or decreases in benefits or services; notice of penalties.

### 3.) Procedure for Submitting a document for translation:

#### 1.) Procedure for Submitting a document for translation:

- a. OPA will email the editable document to Office of Immigrant Affairs – Language Access Program Manager.
- 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 Delicsha Wilds ASD for the OPA
- e. Quote is then signed and emailed back to OIA.
- f. OIA will email you the translated documents.

### 4.) Signage

The OPA has signs in their office to better aid the public in obtaining services. The following signs will be translated into Spanish early 2017:

- The Line Forms Here
- Restrooms
- Employees Only
- Hearings

## 5.) Website

The Office of Property Assessment will update its website to provide language access services to individuals with LEP.

## 6.) Language Access Goals

Write public materials in plain English, and translate extensively. OPA’s Publications and Language Access group, housed within the *Office of External Affairs*, will continue to edit all public materials for plain language and to extensively translate important agency documents. Translation services are centralized at OPA to ensure that translations are clear and consistent. Resources include Language Line Solutions, other translation vendors that perform quality-assurance reviews, and a full-time Spanish translator. The agency has a central 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. OPA’s Publications and Language Access group will continue to make these resources widely known throughout the agency and will continue to enforce agency protocols that support high-quality translations—for example, ensuring that translations are not done in-house (except by the agency’s designated translator) or by machine.

### C. BILINGUAL STAFF

**Current Staff** “This list identifies the languages spoken by the Office of Property Assessment’s staff that is linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

<u>Albanian</u>	<u>Greek</u>	<u>Korean</u>
<u>Arabic</u>	<u>Gujarati</u>	<u>Laotian</u>
<u>Armenian</u>	<u>Haitian</u>	<u>Mandarin</u>
<u>Bengali</u>	<u>Haka</u>	<u>Portuguese</u>
<u>Burmese</u>	<u>Hindi</u>	<u>Punjabi</u>
<u>Cape Verdean</u>	<u>Husa</u>	<u>Russian</u>
<u>Cantonese</u>	<u>Ibo</u>	<u>Spanish</u>
<u>Czech</u>	<u>Italian</u>	<u>Urdu</u>
<u>French</u>	<u>Khmer</u>	<u>Vietnamese</u>



## 2.) Future Plans

Hiring decisions are based on OPA 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.

A “bona fide occupational qualification” is one that is essential to the effective performance of the job. When individuals are sought for positions in which they interact with LEP residents, language skills may be a “bona fide” or relevant job qualification.

Language skill needs may be addressed in any one of three ways:

1. Create new positions for and hire full-time or part-time employees within departments using standard hiring processes.
2. Reclassify an existing position. If the need for interpretation and translation services is high and is expected to be long-term, departments may redefine a position to include the required language skill(s) and request Human Resources to study the work and create the position. This request must be made before filling a vacant position.
3. 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 or interpreting/translation ability; and certification, transcripts, diplomas or other evidence of language proficiency in English or other language; or
- Certification, transcripts, diplomas or other evidence of training in interpreting and/or translation.

Civil Service Commission Regulation 11.032 - SELECTIVE FACTOR CERTIFICATION. When a certification of eligible candidates with specified experience, education, training, license, registration, certification or skill is requested in writing by the appointing authority as being necessary for satisfactory performance in a particular position in an established class or series of classes, and the Director determines that the reasons given fully justify the request, a certification may be made of the two highest ranking eligible candidates on the appropriate list who possess the specified qualification. Selection of the eligible to fill the vacancy will then be made in accordance with the Civil Service Regulations.

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

### 1) Training Protocol

- a. Office of Property Assessment's Language Access Plan & Protocol will become part of the staff handbook, posted on the intranet, and provided as a hard copy to all Office of Property Assessment staff members at hiring.
- b. Office of Property Assessment 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 by OPA training staff.
- 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. Office of Property Assessment will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, Office of Property Assessment will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, Office of Property Assessment 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 Property Assessment. 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 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 Property Assessment'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.
- g. Orientation- New staff training will be provided on the Office of Property Assessment training staff on the Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents. Additional training provided by the OIA.

## **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 Property Assessment for support in creating tag lines.
4. Staff will also have access to the City of Philadelphia Language Access Cards. These are cards with a detachable wallet-size card that say in both English and a second language 'I speak (language). I need assistance in (language)."
5. In all areas of public contact and on its website, the Office of Property Assessment 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 departments and will be collected via quarterly reports by the Office of Immigrant Affairs:

- (1) Number of 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:

- (1) Number of bilingual staff
- (2) 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.

## Annual Report/Evaluation

- 1.) The Office of Property Assessment 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 designated staff will lead the evaluation with the assistance of the Chief Assessment Officer. 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.) Evaluation results and recommended changes will be shared by OPA's Language Access Coordinator 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 Property Assessment 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  
City Hall, Room 110  
Philadelphia, PA 19107  
E-Mail: [orlando.almonte@phila.gov](mailto:orlando.almonte@phila.gov)

The form will also be available on OIA's website once the website is completed.

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:

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

### **Timeline**

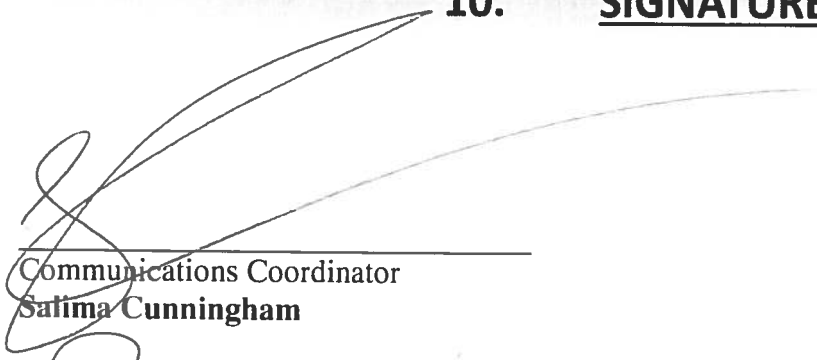
2017

- The Publications and Language Access group 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 Publications and Language Access group will explore ways to track and certify OPA staffs who speak other languages and who are willing to help review translations and provide interpretation services; this will include establishing 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 continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.
- The Publications and Language Access group will work with other groups in the agency to coordinate plain language and/or cultural competency trainings.
- The Publications and Language Access group will explore ways to survey LEP clients to identify new needs, as well as concerns and *other feedback*.
- *The agency will continue to broadly translate materials, provide on-site interpretation as needed, and track these activities.*
- *The agency will adjust and update this plan as needed.*
- *The agency's Language Access Coordinator and Language Access Working Group will provide input on the above steps.*

2018

- *The work outlined in 2017 will continue.*
- *The agency will adjust and update this plan as needed.*

**10. SIGNATURE PAGE**



\_\_\_\_\_  
Communications Coordinator  
**Salima Cunningham**



\_\_\_\_\_  
Chief Assessment Officer  
**Michael Piper**