

# OFFICE OF TRANSPORTATION AND INFRASTRUCTURE SYSTEMS (OTIS) LANGUAGE ACCESS PLAN 2018

## PURPOSE AND AUTHORITY

In cooperation with the Mayor's Office, the Managing Director's Office of Transportation and Infrastructure Systems (oTIS) 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, to ensure meaningful access to City services and programs for individuals with Limited English Proficiency (LEP).

The document establishes an effective plan and protocol for oTIS personnel to follow when providing services to, or interacting with, LEP individuals. Compliance with this plan and protocol is essential to the success of oTIS's mission to direct the policies and practices that improve livability in Philadelphia's diverse communities through safe and sustainable infrastructure.

## GENERAL POLICY

oTIS recognizes that the population eligible for services includes LEP individuals. It is the policy of oTIS to ensure meaningful access to LEP individuals. oTIS adopts the following policy to ensure that LEP individuals can gain equal access to oTIS's services and communicate effectively.

This Language Access Plan (LAP) will apply to all offices and initiatives in oTIS, including:

### CONNECT: The Philadelphia Transportation Project

#### Office of Complete Streets (OCS)

- Bike Corral & Rack, Pedestrian Plaza, and Parklet Programs
- Pedestrian & Bicycle Network Development
- Philly Free Streets
- Vision Zero

#### Office of Transportation & Engagement (OTE)

- Better Bike Share Partnership (BBSP)
- Indego Bike Share
- Roosevelt Boulevard Route for Change Program
- Street Furniture Program
- Transit First Initiative

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. oTIS intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. oTIS

seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

oTIS, rather than the LEP customer, bears the responsibility to:

1. Provide language-appropriate services;
2. Identify and record language needs at the initial point of contact;
3. Discourage the use of informal interpreters such as family, friends of the person seeking services, or other customers;
4. Prohibit minor children from acting as interpreters; and
5. Provide an interpreter to an LEP customer to receive services.

The preferred method of serving LEP persons is by:

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. Providing available, trained, and competent bilingual staff for in-person or telephone interpreting to support other staff.
3. Seeking assistance from professional in-person or telephonic interpreters when staff cannot meet language needs.
4. Recognizing that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (for example, situations concerning the Health Insurance Portability and Accountability Act, 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.

## LANGUAGE ACCESS COORDINATOR

oTIS has appointed a Language Access Coordinator (LAC) to implement and monitor its language access services. The representative serves as the liaison between oTIS and the Office of Immigrant Affairs (OIA) to communicate with LEP communities through established organizations.

### Language Access Coordinator

Christopher M. Puchalsky, Ph.D.  
Director of Policy and Special Initiatives  
Office of Transportation & Infrastructure Systems  
1401 JFK Boulevard, Suite 1430  
Philadelphia, PA 19102  
T: 215-686-9001  
E: christopher.puchalsky@phila.gov

Alternate Language Access Coordinator: To be determined.

Deputy Managing Director: Michael A. Carroll, P.E.

# DIRECT CONTACT WITH LEP INDIVIDUALS

oTIS has two (2) points of contact with the public:

1. Community Meetings/Hearings. It is anticipated that LEP individuals will participate in some oTIS outreach meetings. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation via GLOBO.
2. Events. It is anticipated that LEP individuals will request information at events or large gatherings. In these instances, if there is no bilingual staff available to interpret, oTIS will rely on translated material or telephonic interpretation via GLOBO.

## LANGUAGE ACCESS SERVICES AND PROTOCOLS

### INTERPRETATION

In situations when an individual approaches an employee and appears to be asking for help, but has difficulty communicating what he or she needs, it is oTIS's responsibility to ensure that the inability to communicate in English does not deprive the public of rights and privileges. Therefore, oTIS will provide an interpreter, at no cost to the resident, for LEP persons:

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 who speak the language being requested is available.
2. When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services. The processes to do so is outlined below:

#### **Telephonic Interpretation**

oTIS can get an over-the-phone interpreter by calling the following vendor, GLOBO. This service is available 24/7.

To reach an interpreter, employees can follow the instructions below:

1. Call XXX-XXX-XXXX
2. Enter PIN
3. Tell the operator the language needed
4. An interpreter will then be transferred into the call

When an LEP person requests in-person interpretation for a *future* meeting, telephonic or in-person interpretation may be used. The process for requesting an in-person interpretation is below:

#### **In-Person Interpretation**

Staff can request an in-person interpreter to be contacted from the following vendor: Nationalities Service Center. This service is available 24/7, but please give more than 48 hours of notice whenever possible. In an emergency, use a telephonic interpreter.

**Note:** Before staff can submit a request for in-person interpretation to OIA, approval from oTIS LAC is needed.

For OIA to submit a request on behalf of oTIS, the following steps will be taken:

1. Visit [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services);
2. Fill out service request form and be sure to select interpretation; and
3. Enter any interpretation appointment information available.

An email confirmation will be sent once an interpreter has been confirmed.

### **Cancellation of In-Person Interpreter**

If an in-person interpreter is no longer needed, call Nationalities Service Center to cancel the request at least one (1) full business day in advance of the scheduled time (if possible).

### **Future Plans**

- Increase in-person interpretation services. oTIS can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center when given enough notice.

## **TRANSLATION**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, oTIS will provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage, and portions of our website.

### **Vital Documents**

oTIS has developed a list of the documents that are vital to the access of LEP persons. This list will be updated as needed.

Vital documents to be translated include:

- Fact Sheet about the Vision Zero Action Plan
- Fact Sheet for the forthcoming Connect: The Philadelphia Transportation Project

Documents already available in other languages include:

- Key Indego Membership Information
- Key PhillyFreeStreets outreach materials

### **Future Plans**

- After collecting data to determine our department's language needs, oTIS will reevaluate the forms and languages represented above.

Procedure for submitting a document for translation:

1. Email the editable document to oTIS LAC. Please include the LAC on all emails for follow up purposes.
2. The LAC will submit the translation request to the OIA.
3. The OIA will submit translation to vendor to obtain a quote.
4. The OIA will email the LAC with a quote for approval.

5. The quote must be authorized by the LAC.
6. The quote is then signed by the LAC and emailed back to OIA.
7. OIA will email the LAC the translated documents.

**Note:** Before submitting a document for translation, staff will review documents and ensure the following:

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

### **Websites**

oTIS will post translated materials online as needed.

- oTIS: [www.phila.gov/otis](http://www.phila.gov/otis)
- Indego Bike Share: <https://www.rideindego.com/>

### **Future Plans**

- Increase Translation of Materials: oTIS will continue to edit necessary public materials for plain language and to translate important agency documents and materials.

### **BILINGUAL STAFF**

Below is a list of oTIS staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.

- [REDACTED]

### **Future Plans**

- oTIS will determine future plans after collecting data to illustrate the demand and need of language interpretation and translation.

### **TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS**

The oTIS Language Access Plan will be posted online and be made available to all oTIS staff members.

All oTIS staff providing technical assistance, training, or receiving in-bound calls will receive annual LEP training, or training upon employment, and then annually thereafter.

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 individual's language preference;
- Obtaining interpreters (in-person and telephonic);
- Using and working with interpreters (in-person and telephonic);
- Translating procedures;
- Documenting language requests; and
- Using, or when not to use, bilingual staff as in-house interpreters.

oTIS will circulate the oTIS Language Access Plan to all staff within 30 days after adoption.

To establish meaningful access to information and services for LEP individuals, staff who regularly interact with the public, and those who will serve as in-house interpreters, will receive training about oTIS's Language Access Plan. Training will ensure that staff members are able to work effectively 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.

Orientation. New staff training will be provided about the oTIS Language Access Plan and how to effectively communicate with LEP residents.

### **Future Plans**

- Further standardize language access resources and tools. oTIS will update and standardize language access tools and resources, and ensure that all public-facing programs have appropriate language access signage and materials. As applicable, oTIS will update its list of staff who speak languages other than English and who are willing to help review translated materials and/or assist with interpretation in emergencies.

## **ADMINISTRATIVE HEARINGS**

This section does not apply to oTIS at this time.

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

Direct Services. oTIS does not provide direct services.

Notices and Flyers. Key Notices and flyers will include information about the availability of language services, and, when necessary, instructions about how to request language assistance at a public meeting.

Taglines. When needed, taglines 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 where individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. oTIS will contact the OIA for support in creating taglines.

Public-Facing Interaction. In all areas of public contact and on our website, oTIS 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.

# DATA COLLECTION AND ANNUAL REPORT

The following information will be required to be monitored and collected by the LAC and will be aggregated via annual reports by oTIS:

1. Number of LEP encounters (by Language), American Sign Language encounters, when they occurred, and total time of interaction;
2. Type of language services provided to LEP customers;
3. Number of documents translated; and
4. Language services expenditures.

Additionally, the LAC is required to report annually on the following:

1. Number of bilingual staff, and
2. Number of staff trained in Language Access.

oTIS 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 LAC will lead the evaluation with the assistance of the OIA. The evaluation will include the following:

1. Assessment of the use of telephonic interpretation, in-person interpretation, and translation services.
2. Assessment of data collected about the LEP customer's primary language.
3. Assessment of the number and types of language requests during the past year.
4. Assessment of whether staff members understand the Language Access Plan, how to carry it out, and whether language assistance resources and arrangements for those resources are up-to-date and accessible.
5. Assessment of complaint information; and
6. Assessment of soliciting feedback from LEP individuals and community groups.

oTIS staff 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 LAC. If the individual is LEP, the person's language of choice will be noted for future visits.

The oTIS LAC will track the number of individuals who 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.

Evaluation results and recommended changes will be shared by the oTIS LAC and incorporated into the **annual report, which is required to be filed under Philadelphia Home Rule Charter § 8-600**. The LAC will also keep records of any language access services provided and will make this information available during the annual review process. To update the Language Access Plan, oTIS may use some of the following tools to conduct further assessment:

1. Request comments and feedback from visitors who have received language services, and
2. Establish a tracking system to collect primary-language data for individuals who participate in programs and activities.

# LANGUAGE ACCESS COMPLAINT PROCEDURE

A formal Language Access grievance can be filed with the OIA if it is believed that a person has been wrongly denied the benefits of this Language Access Plan. A complaint must be filed within six (6) months of the alleged denial. To file a formal complaint, a *Language Access Grievance Form* is to be submitted in person, by mail, or e-mail to:

Office of Immigrant Affairs (OIA)  
Orlando Almonte  
Language Access Program Manager  
Municipal Services Building  
1401 JFK Blvd., 14th Floor, Suite 1430  
Philadelphia, PA 19102  
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).

## TIMELINE FOR IMPLEMENTATION

In this section, please list what the timeline will be to implement the Language Access Plan. The timeline should list when strategy/objectives/services will be completed and who will be the person within the department responsible for its implementation. It is anticipated that the Language Access Plan will be adopted in April 2018.

Major milestones in our plan will include:


1. Implement plan,
2. Collect first year data,
3. Train staff,
4. Set up systems to collect data, and
5. Translate public documents.

Timeline: To be completed in 2018

1. Begin implementation of the oTIS Language Access Plan;
2. Set up data collection system;
3. Explore training opportunities for staff;
4. Translate key public documents;
5. Adjust and update this plan as needed; and
6. Complete the Annual Report.



# SIGNATURE PAGE



4/3/18

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Christopher Fuchalsky, Ph.D  
Director of Policy & Strategic Initiatives  
Office of Transportation and Infrastructure Systems  
oTIS Language Access Coordinator

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To be determined  
Alternate Language Access Coordinator



4/3/18

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Michael A. Carroll, P.E.  
Deputy Managing Director  
Office of Transportation and Infrastructure Systems