

OFFICE OF HOMELESS SERVICES LANGUAGE ACCESS PLAN & PROTOCOL

1. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Office of Homeless Services (OHS) 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 OHS 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 provide the leadership, coordination, planning and mobilization of resources to make homelessness rare, brief, and non-recurring in the City of Philadelphia.

2. GENERAL POLICY

OHS recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of OHS to ensure meaningful access to LEP individuals. OHS adopts the following policy to ensure that LEP individuals can gain equal access to OHS services and communicate effectively.

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. OHS intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. OHS seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

OHS, 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 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.

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. 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

OHS Language Access Coordinator

Linda White, Communications Coordinator
City of Philadelphia Office of Homeless Services
MSB, 1401 JFK Boulevard, Suite 1030
215-686-6726
Linda.white@phila.gov

4. DIRECT CONTACT WITH LEP INDIVIDUALS

OHS has several points of contact with the public:

1. Administrative Offices – MSB 1401 JFK Boulevard, 10th floor - Point-to Language Identification Poster and Cards are in place at the front desk to assist staff and LEP consumers in identifying their primary language
2. Appletree Family Center* – 1430 Cherry Street – Intake for families and single women. Four dual handsets are used for telephonic interpretation. Point-to Language Identification Poster; bilingual staff members who provide in-person interpretation; some essential forms and regulations available in English and Spanish
3. Roosevelt Darby Center* – 802 N. Broad Street – Intake for single men – one dual handset for telephonic interpretation; point-to identification poster; bilingual OHS staff members who provide in-person interpretation
4. The Salvation Army Red Shield Family Residence* – 715 N. Broad Street – After-hours intake for families - language access resources being installed
5. House of Passage* – 111 N. 49th Street – After hours intake for single women - no language access resources
6. Station House* – 2601 N. Broad Street – After hours intake for single men – bilingual staff members who provide in-person interpretation; some essential forms and rules and regulations available in English and Spanish

7. Emergency Assistance and Response Unit (EARU) – 1430 Cherry Street – Language Identification Poster at the reception desk; one dual handset used for telephonic interpretation
8. Riverview Personal Care Home – 7979 State Road – Language Identification Poster at the reception desk

*These are intake sites where individuals who are experiencing homelessness go for initial assessment before placement into the homeless housing system.

5. LANGUAGE ACCESS SERVICES AND PROTOCOLS

A. INTERPRETATION

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 consumer, for LEP individuals. Services offered include telephonic interpretation and in person interpretation.

Interpretation services take place on the day the consumer arrives at intake. Intake workers will make arrangements for interpretation services with a trained in-person or telephone interpreter. The OHS staff member will help the consumer utilize the posters or brochures to determine what language s/he speaks, and ensure that an in-person or telephonic interpreter is used to assist the consumer.

All intake sites have and use posters and brochures from Language Line Services which are designed to assist LEP consumers. A point-to poster is available at the sites which list 20 different languages and states that consumers have a right to interpretation at no cost to them. Language identification brochures list 95 languages and can be used in a face-to-face situation to determine which language a person speaks.

Essential forms that consumers must complete to access services i.e. applications, consent forms, complaint forms, customer satisfaction surveys, or notices have been translated into Spanish. This is the language used by most LEP consumers that are served by OHS. The consumer will complete the essential documents in his/her language.

Future Plans for Interpretation

The OHS and EARU informational brochures are being updated and will be translated into Spanish. OHS will work with OIA for document translation services. The OHS website will be updated to include information in Spanish. Additional materials will be provided by OIA.

Protocols

An interpreter will be provided for LEP persons pursuant to the following:

- An individual approaches an OHS 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 OHS employee shall determine the availability of a bi-lingual staff member who speaks the language being requested.

When bilingual staff is not available, the OHS staff member shall contact a telephone interpreter service to provide interpreter services. The process to do so is outlined below.

Telephonic Interpretation

OHS can get an over-the-phone interpreter by calling LanguagLine. This service is available 24/7. Call 866-874-3972 and provide the Client ID. If you are unsure of the code, please contact the Language Access Coordinator.

In-Person Interpretation

An in-person interpreter can be requested by contacting 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

- 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 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).

Future Plans for Improving Interpretation Services and Protocols

OHS is identifying staff who can serve as in-person translators. OHS will ensure that the public knows of the availability of these services through its website, social media, visible multilingual signs, and will train all intake staff on requesting in-person and telephonic interpretation services.

B. TRANSLATION

OHS will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website. OHS has developed a list of documents that are vital to access to OHS housing programs for LEP persons. Documents have also been identified that may contain important information and will contain notice of OHS language access services and how to obtain them. OHS currently provides some vital documents in Spanish. They include:

- EARU Checklist of Necessary Documentation
- Authorization for the Release of Information
- Client Contract
- Declaration of Homelessness
- Housing Placement Addendum to Service Agreement
- Children's Services Agreement
- OHS Service Agreement
- Immunization Program – Appointment Letter
- Income Information

- Eligibility Verification
- TB Screening/Nurses Clearance
- Notices advising LEP individuals of free language assistance services

Procedure for submitting a document for translation:

1. Email the document, in Word format, to the Language Access Coordinator with a request for translation
2. The Language Access Coordinator will email the document to the Office of Immigrant Affairs – Language Access Program Manager at Orlando.almonte@phila.gov
3. OIA will submit the translation request to translation vendor to obtain a quote
4. OIA will email you a quote with a time estimate for delivery of the translation
5. Quote must be authorized by OHS fiscal officer
6. Quote is then signed and returned to OIA via email. *Work will not begin until the signed quote has been returned.*
7. OIA will email the translated documents when complete

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

- The content has not already been translated in another document
- The document and translation procedure has been approved by your supervisor
- The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)
- Terms that you do not want translated are highlighted, i.e. addresses, name of programs/services being provided
- 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

Signage

In all areas of public contact and on its website, OHS 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.

Website

The OHS website contains information about the entire range of OHS services. The website is undergoing revisions and will include more information and materials in Spanish when completed.

Future Plans for Translation

In Fiscal Year 2017 OHS will make its website more accessible to LEP persons. This includes identifying the most important information to be translated and the best means for disseminating the information to LEP communities. OHS will include tag lines in the website that explain that LEP individuals can obtain vital documents in their language or that interpretation is available at intake sites. The OHS Language Access Coordinator will continue to make translation services widely known throughout the agency and will continue to enforce agency protocols that support high-quality translations to ensure that translations are not done in-house or by machine.

C. BILINGUAL STAFF

Future plans for building in-house language capacity include:

Hiring

OHS will ensure that each intake sites have staff with bilingual or multilingual skills. OHS will consider creating an assessment process which may include: formal testing of language proficiency/translation ability; and certification, transcripts 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.

Staff Interpreters

Competent and trained bilingual staff can also function as interpreters for other staff. These staff will go through formal interpretation training once they are identified.

Language Sensitive Assignments

OHS will consider the options available to assign or configure employees in order to best communicate with LEP individuals served by or in contact with the department without imposing unfair burdens on bilingual staff.

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

Training Protocol

- OHS's Language Access Plan & Protocol is provided as a hard copy of all OHS staff members.
- OHS 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.
- All staff providing assistance or receiving telephone calls will receive annual LEP training, or training upon employment and then annually.
- 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 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.
- OHS will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, OHS will circulate the revised policy and protocols to all staff. Within nine months of the adoption of this policy, OHS 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 OHS. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

- 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 OHS's LEP policy, plans and protocols. 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 his 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 – training will be provided for new staff on the OHS Language Access Plan and Protocol; OHS will provide guidance on how to effectively communicate with LEP clients.

Future Plans for Training

OHS will expand training opportunities in collaboration with OIA on effective communication with LEP consumers, cultural competency topics, and use of telephonic interpretation. We will explore opportunities to do so, as outlined in the timeline below.

E. ADMINISTRATIVE HEARINGS

This section applies does not apply to the Office of Homeless Services at this time.

6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS

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 principal 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.

Future Plans: 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 individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. OHS will contact the OIA for support in creating taglines.

7. DATA COLLECTION AND ANNUAL REPORT

OHS intake 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.

- If the individual is Limited English Proficient, the person's language of choice will be noted for future services.
- OHS'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.

The following information will be required to be monitored and collected by front-line staff and will be aggregated via quarterly reports:

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

OHS 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 Director. 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.

Evaluation results and recommended changes will be shared by 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 XX 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

Future Plans for Data Collection and Annual Report

OHS has developed a brief customer service survey that will be translated into Spanish. Results can be used to measure performance, and assist with data collection. This information will be included in the Annual Report to be submitted to OIA. Performance measures will be made appropriate to OHS operations.

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

OHS has an established 24/7 Consumer Response Line for persons housed in emergency housing who would like to file a complaint anonymously. The outgoing message is in English and Spanish; bilingual staff members review and respond to complaints.

An LEP consumer may file a formal Language Access grievance with OIA if the individual believes that he or she was wrongly denied the benefits of this Language Access Plan. The consumer must file the complaint within six (6) months of the alleged denial. To file a formal complaint, the consumer must complete a Language Access Grievance Form and submit the form in person, by mail or email to:

Office of Immigrant Affairs
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

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

9. TIMELINE FOR IMPLEMENTATION

Major milestones in our plan will include:

- Continuing to broadly translate and interpret
- Updating agency language access tools and resources
- Exploring additional training opportunities
- Establish and enforce language access requirements with OHS contractors and their subcontractors

Ongoing

- Communicate with front desk and intake staff to discuss language access and any emerging needs or challenges
- Work closely with City Hall and communicate with other City agencies about best practices, tools that can be shared, and challenges of carrying out the plan
- Coordinate translation of materials and on-site interpretation, and track these activities

- OHS website updates
- Monitor, evaluate and update the agency's language access policies, procedures and plan
- Conduct customer satisfaction surveys of LEP clients based on their actual experience of accessing the agency's programs, benefits, and services

10. SIGNATURE PAGE

 4/10/18
Communications Coordinator Date
Office of Homeless Services

 4/10/18
Director Date
Office of Homeless Services