

OFFICE OF HUMAN RESOURCES **LANGUAGE ACCESS PLAN & PROTOCOL** **2018**

1. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Office of Human Resources 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 Name) 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 the Office of Human Resources.

2. GENERAL POLICY

The Office of Human Resources recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of Office of Human Resources to ensure meaningful access to LEP individuals. Office of Human Resources adopts the following policy to ensure that LEP individuals can gain equal access to Office of Human Resources 'services and communicate effectively. This Plan applies to all Office of Human Resources offices and satellite offices. Because the Office of Human Resources is responsible for processing applications for employment and certifying eligible applicants for consideration to be appointed to positions in the Civil Service, and because it is a general requirement for persons selected for appointment to be able to effectively communicate in English, the primary purpose of this document is to describe the general requirements for employment to persons with LEP.

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

The Office of Human Resources, 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

The preferred method of serving LEP customers is by using telephonic interpretation. If available, 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.

3. LANGUAGE ACCESS COORDINATOR

Language Access Coordinator
Janine LaBletta
Hiring Services Manager
Office of Human Resources
1401 JFK Blvd., Room 1530
janine.labletta@phila.gov

Director:
Pedro Rodriguez
Office of Human Resources

4. DIRECT CONTACT WITH LEP INDIVIDUALS

Office of Human Resources has one main point of contact with the public:

Office walk-ins - During normal business hours, LEP individuals come into OHR's office looking for help in obtaining services on an occasional basis. In these instances staff uses telephonic interpretation. OHR Benefits unit handles inquiries from dependents with existing bilingual staff/language line. Main providers of benefits have the capacity to provide information and handle inquiries in several languages.

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 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.

When bilingual staff are not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:

Telephonic Interpretation

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

To submit a request, call [REDACTED] and provide the following information when greeted by a coordinator:

- When prompted, please enter your PIN: [REDACTED] and follow the prompts to select your language.
- Hold momentarily while your interpreter is connected. Once on the line, you will be notified and provided with the interpreter's ID number.
- Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in the first person.
Example: "What is your name?" NOT "Ask her what her name is."
- Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.

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 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.

[Before submitting a request for in-person interpretation, please receive approval from the Language Access Coordinator]

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 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

Use telephonic interpretation, and ensure that the public knows about the availability of these services. OHR makes telephonic interpretation services available in its main office through GLOBO. 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.

Grow in-person interpretation services. OHR can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. OHR 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

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.

Procedure for Submitting a document for translation:

- a. Email the editable document to the Director, his/her designee, and the Language Access Coordinator for review.
- b. The request is reviewed, and if approved, forwarded for translation.
- c. The Language Access Coordinator will submit the translation request to the OIA.
- d. The OIA will submit translation to vendor to obtain a quote.
- e. The Office of Immigrant Affairs will email the Language Access Coordinator with a quote for approval.
- f. Quote must be authorized by the Director or designee for budgetary approval.
- g. Quote is then signed by Director or his/her designee and emailed back to Office of Immigrant Affairs.
- h. Office of Immigrant Affairs will email the Director and Language Access Coordinator the translated documents.

This protocol allows for the monitoring and tracking of requests for translation services to ensure OHR is effectively addressing LEP needs and also for annual reporting.

NOTE: Before submitting a document for translation, staff will review documents 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 that 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, staff may request the same vendor to keep the translation consistent.

C. BILINGUAL STAFF

This list identifies the languages spoken by OHR staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters:

Spanish, Korean, Haitian, Bengali, Hindi, French, Portuguese, Punjabi, Arabic, Greek

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

1) Training Protocol

a. Office of Human Resources' Language Access Plan & Protocol is posted on the intranet, and provided as a hard copy to all Office of Human Resources staff members at hiring.

b. Office of Human Resources 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 inbound calls will receive annual LEP training, or training upon employment, and then bi-annually.

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 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.

e. Office of Human Resources will circulate this language access policy and related protocols to all staff within 30 days after adoption. Every two years, Office of Human Resources will circulate the revised policy and protocols to all staff after adoption. Within 12 months of the adoption of this policy, Office of Human Resources will provide cultural competency training, including training regarding 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 12 months of the beginning of their employment with Office of Human Resources. After their initial training, all staff members will receive refresher training in cultural competency and language access every three years.

f. 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 Office of Human Resources' 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 Human Resources Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

E. ADMINISTRATIVE HEARINGS

This section does not apply to the Office of Human Relations at this time.

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 principal 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.
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).'

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 Office of Human Resources.

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 Office of Human Resources 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 soliciting feedback from LEP individuals and community groups.
- f. The Office of Human Resources 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.

Evaluation results and recommended changes will be shared by the Office of Human Resources 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.

8. LANGUAGE ACCESS COMPLAINT PROCEDURE

You may file a formal Language Access grievance with the Office of Human Relations 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
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

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.

Timeline

Implementation Plan Logistics

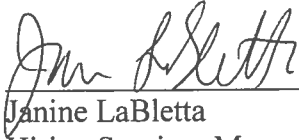
Major milestones in our plan will include:

- Continuing to interpret policies and procedures as requested by candidates in their language
- Updating agency language access tools and resources
- Exploring additional training opportunities for staff around language access
- Surveying staff and departments or candidates for feedback on OHR's Language Access Plan

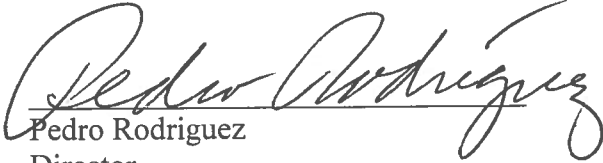
Timeline

- The Language Access Coordinator will meet with front-line OHR staff to discuss language access challenges, best practices and methods for tracking language access data by program/site, as well as to brainstorm ideas for new or updated language access resources these staff might need.
- The Director will implement purchase and distribution of posters and other resources for reception of in-person interpretations.
- OHR will track and report on activities involving requests for language services.
- OHR will access ways to track staff who speak other languages and who are willing to help review translations and provide interpretation services for the agency.
- The Language Access Coordinator will continue to communicate with frontline staff to discuss language access and any emerging needs/challenges.
- OHR will adjust and update this plan as needed.

10. SIGNATURE PAGE



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Office of Human Resources
Language Access Coordinator



Pedro Rodriguez
Director
Office of Human Resources