

# MURAL ARTS PROGRAM LANGUAGE ACCESS PLAN 2017

## 1. PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Mural Arts Program 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 Mural Arts Program 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 - WE BELIEVE ART IGNITES CHANGE. We create art with others to transform places, individuals, communities and institutions. Through this work, we establish new standards of excellence in the practice of public and contemporary art.

Our process empowers artists to be change agents, stimulates dialogue about critical issues, and builds bridges of connection and understanding. Our work is created in service of a larger movement that values equity, fairness and progress across all of society. We listen with empathetic ears to understand the aspirations of our partners and participants. And through beautiful collaborative art, we provide people with the inspiration and tools to seize their own future.

## 2. GENERAL POLICY

The Mural Arts Program recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Mural Arts Program to ensure meaningful access to LEP individuals. The Mural Arts Program adopts the following policy to ensure that LEP individuals can gain equal access to the Mural Arts Program services and communicate effectively. This plan applies to all the Mural Arts Program offices and satellite offices.

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

The Mural Arts Program, 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

#### Language Access Committee

Gabriela Raczka

Senior Executive Assistant to the Director,  
Language Access Program Coordinator  
City of Philadelphia Mural Arts Program  
1729 Mt. Vernon Street Philadelphia, PA 19130  
Direct: (215) 685-0760  
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**Director:**

Jane Golden

City of Philadelphia Mural Arts Program

### 4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Mural Arts Program (MAP) has several points of contact with the public:

1. Office walk ins- the Mural Arts Program has encountered a few LEP individuals coming into the Mural Arts Program looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
2. Office calls- at times the Mural Arts Program front desk will receive calls from LEP individuals. In these instances, if there is no bilingual staff available to interpret, staff uses telephonic interpretation.
3. Meetings/Information Sessions: at times MAP will hold meetings or community paint sessions to engage with the public. If language needs are anticipated, MAP will utilize bilingual staff or in-person interpretation for the appropriate language.

The data collection portion of this plan will help us to better inform where and which documents needs to be translated and into what 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:

- An individual approaches an 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 employee shall determine whether bi-lingual staff in the office is available who speaks the language being requested.

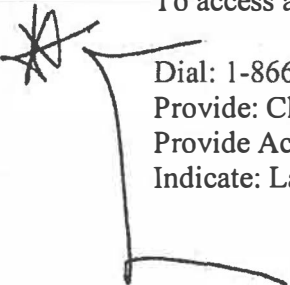
When bilingual staff are not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:

#### Telephonic Interpretation –

The Mural Arts Program can get an over-the-phone interpreter by calling the following vendor: LanguageLine. This service is available 24/7.

To access an interpreter:

Dial: 1-866-874-3972  
Provide: Client ID: XXXXXX  
Provide Access Code: XXXX  
Indicate: Language



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, Gaby Raczka (language access coordinator)**

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

**1. Future Plans-**

**a. Use telephonic interpretation, and ensure that the public knows about the availability of these services.** The Mural Arts Program makes telephonic interpretation services available in its main office through LanguageLine. 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.

**b. Grow in-person interpretation services.** The Mural Arts Program can offer in-person interpretation for scheduled meetings and events as needed through Nationalities Service Center if given enough notice. The Mural Arts Program 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.

**Vital Documents** – the Mural Arts Program has developed a list of the documents that are vital to the access of LEP persons. MAP currently provides documents in the following languages:

Future Plans: After collecting data to determine our department's language needs, the Mural Arts Program will reevaluate the forms and languages represented above.

**Procedure for Submitting a document for translation:**

- a. Email the editable document to the Mural Arts Program language access coordinator. Please include the coordinator on all emails for follow up purposes.
- b. The Coordinator will submit the translation request to the OIA
- c. The OIA will submit translation to vendor to obtain a quote
- d. The Office of Immigrant Affairs will email the coordinator with a quote for approval
- e. Quote must be authorized by coordinator
- f. Quote is then signed and emailed back to Office of Immigrant Affairs
- g. Office of Immigrant Affairs will email the coordinator the translated documents

**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.

**Signage-**

At this time we have no signs posted for the public about receiving our services in English or other languages. We are in the process of rebranding all of our materials. Once we have new collateral made up we can determine which signage needs to be translated and submit for translation

**Website**

- Mural Arts shall take reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.
- Departments should be weary of google translate and not use it as a permanent solution to translation.
- Identify area on website where taglines are appropriate.

Future Plans: Write public materials in plain English, and translate extensively. The Mural Arts Program will continue to edit all public materials for plain language and to translate important agency documents and materials.

**C. BILINGUAL STAFF**

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

**1.) Current Staff**

Language	Proficiency	Staff Member	Phone	Email
Korean	Bilingual	Jessica Im		jessica.im@muralarts.org
Spanish	Bilingual	Karl Malkin		karl.malkin@muralarts.org
Spanish	Bilingual	Sam Rodriguez		Samuel.Rodriguez@muralarts.org
Spanish	Bilingual	Patty Barrera		Patricia.Barrera@muralarts.org
Spanish	Bilingual	Laiza Santos		Laiza.santos@muralarts.org
Spanish	Bilingual	Carlos Vasquez		Carlos.Vasquez@muralarts.org
Spanish	Conversational	Phil Asbury		Phil.asbury@muralarts.org
Spanish	Conversational	Maria Moller	_____	maria.moller@muralarts.org
Spanish	Conversational/Basic	Ryan Spillman		ryan.spilman@muralarts.org
French	Bilingual	Netanel Portier		Netanel.portier@muralarts.org
Albanian	Bilingual	Don Serjani		don.serjani@muralarts.org
Italian	Bilingual	Don Serjani		don.serjani@muralarts.org
Italian	Conversational	Maria Moller	__ _____	maria.moller@muralarts.org
ASL	Conversational	Will Cooper-Balis		Will.cooper-balis@muralarts.org
Mandarin	Conversational	Ambrose Liu	- _____	ambrose.liu@muralarts.org
Hindi	Basic	Maria Moller	_____	maria.moller@muralarts.org
German	Basic	Maria Moller	_____	maria.moller@muralarts.org

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

The Mural Arts Program Language Access Plan & Protocol will be posted online, and provided as an electronic copy to all the Mural Arts Program staff members at hiring.

All staff providing technical assistance, training or receiving in-bound 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;

The Mural Arts Program will circulate this language access policy and related protocols to all staff within 60 days after adoption. Every two years, the Mural Arts Program will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, the Mural Arts Program 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 two years of the beginning of their employment with MAP. 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 the Mural Arts Program 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.

Orientation- New staff training will be provided on the Mural Arts Program Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

#### **Future Plans:**

1. **Further standardize language access resource and tools across the Mural Arts Program.** The Mural Arts Program will work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available at sites. Another goal is to update the language database of staff who speak languages other than English and who are willing to help review translated materials and/or assist with interpretation in emergencies.

## **E. ADMINISTRATIVE HEARINGS**

This section applies does not apply to the Mural Arts Program 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.

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. The Mural Arts Program will contact the OIA for support in creating taglines.

In all areas of public contact and on its website, the Mural Arts Program 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 front-line staff and will be aggregated via annual reports by the Mural Arts Program:

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 Mural Arts Program 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 the Mural Arts Program 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, MAP may use some of the following tools to conduct further assessment:

Request comments and feedback from visitors that have received language services



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  
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)

## 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.

Major milestones in our plan will include:

- Implement Plan
- Collect first year data
- Train frontline responders
- Set up systems to collect data
- Public translated documents

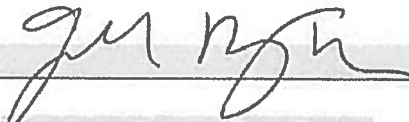
### **Timeline**

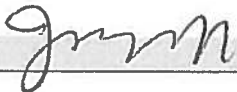
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- Begin implementation of the Mural Arts Program Language Access Plan

- Set up systems to collect data
- Explore training opportunities for staff
- Public translated documents
- The agency will adjust and update this plan as needed.
- Complete annual report

10. SIGNATURE PAGE

  
Language Access Coordinator

  
Director  
Jane Golden