

MAYOR'S OFFICE OF EDUCATION (MOE)
LANGUAGE ACCESS PLAN

Prepared by:
Mayor's Office of Education
215-686-0333

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MAYOR'S OFFICE OF EDUCATION **LANGUAGE ACCESS PLAN & PROTOCOL**

(Updated March 2019)

PURPOSE AND AUTHORITY

In Cooperation with the Mayor's Office, the Mayor's Office of Education 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 Mayor's Office of Education 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 which is to provide leadership to improve education in the City of Philadelphia.

GENERAL POLICY

The Mayor's Office of Education recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Mayor's Office of Education to ensure meaningful access to LEP individuals. The Mayor's Office of Education adopts the following policy to ensure that LEP individuals can gain equal access to the Mayor's Office of Education services and communicate effectively. This Plan applies to all Mayor's Office of Education 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 Mayor's Office of Education intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Mayor's Office of Education seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.

The Mayor's Office of Education, 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.

The Mayor's Office of Education, 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.

LANGUAGE ACCESS COMMITTEE

Language Access Coordinator

Otis Hackney, Chief Education Officer for the City of Philadelphia appoints Abby Schottenfels, Executive Assistant to the Chief Education Officer, as the Language Access Coordinator

Abby Schottenfels | One Parkway Building, 3rd floor

1515 Arch, Philadelphia, PA 19102

P: 215-686-0336

E: Abby.Schottenfels@phila.gov

DIRECT CONTACT WITH LEP INDIVIDUALS

The Mayor's Office of Education (MOE) has several points of contact with the public:

- (1) Office walk ins- Several times a week LEP individuals come into MOE'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 MOE will hold meetings or information sessions. If language needs are anticipated, MOE will arrange with the Mayor's Office of Immigrant and Multicultural Affairs (MOIMA) to utilize in person interpretation for the appropriate languages spoken.
- (3) Field Work and Public Outreach- at times, MOE has several public outreach and fieldwork events. In this case, we will work with the School District of Philadelphia's translation services or arrange with the Mayor's Office of Immigrant and Multicultural Affairs (MOIMA) to utilize in person interpretation for the appropriate languages spoken.
- (4) Constituent concerns via-phone: For phone interpretation, we will first utilize staff members that speak the desired language and if they are not available, we will contact the telephonic interpreter.

Specific regions we serve:

For constituent services and Philly Pre-K we serve all of Philadelphia.

For Community schools, we serve:

William Cramp Elementary School
Murrell Dobbins CTE High School
F.S. Edmonds Elementary School
Edward Gideon Elementary School
Kensington Health Sciences Academy
Logan Elementary School
Southwark Elementary School
South Philadelphia High School
Tilden Middle School
George Washington High School
Alain Locke Elementary School
Samuel Gompers School

LANGUAGE ACCESS SERVICES AND PROTOCOLS

1. Interpretation

➤ 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.*

Telephonic Interpretation Services:

➤ Protocol for when to use telephonic interpretation services:

- 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.

➤ Procedure to use telephonic interpretation services: *When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:*

- **If you are calling the person:** Call 866-592-5530 to access a Qualified Interpreter and complete the following steps:
 - a. When prompted enter the five-digit access code: 99203
 - b. Listen for the prompts and select the language needed for the individual once the specific number is given. Note: If the language is specified the, the interpreted session will now begin.
 - c. For all other languages, when greeted by a coordinator, request the language needed or ask for assistance in identifying the language.
 - d. Provide the following information once an interpreter has been provided:
 - i. Caller name
 - e. Hold momentarily while the interpreter is connected. Once on the line, you will be notified and provided with the interpreter's ID number.
 - f. Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in first person.
 - i. Example: "What is your name?" NOT "Ask her what her name is."
 - g. Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.
 - h. Invoice to follow.

- If you are already on the line and need to call the translation services: Use the directions below to use the three-way call feature on your desk phone and then follow the steps above to obtain a Qualified Interpreter.
 - a. With caller on the line, press the transfer key
 - b. Dial 866-592-5530 to access a Qualified Interpreter
 - c. When prompted enter the five-digit access code: 99203
 - d. When the third party is on the line, press the CONF Soft key

In-person translation services (Service should be approved by your supervisor before proceeding with an expense request for an in-person translator):

- **Protocol for when to use in-person interpretation services:**
 - An in-person interpretation service should be used when an MOE staff member is holding an event that will include LEP individuals that do not speak English as a second language.
- **Procedure to use in-person interpretation services**
 - a. *Requests must be submitted 5 business days in advance before the scheduled event:*
 - b. **Supervisor's must approve this request before it is made.**
 - To request interpretation services, email the Office Manager, contact information on page 3 of this plan). including the following information:
 - Date of the event
 - Start time of the event
 - End time of the event
 - Language(s) requested
 - Whether it is an ongoing or one-time event
 - Nature of the assignment (Ex: community forum, small school meeting, conference)
 - Full address of the event
 - The Office Manager will schedule the interpreter and confirm with the MOE staff member requesting via e-mail.
 - For events held at schools, MOE will work in partnership with the School District of Philadelphia to identify interpreters.

2. Translation Services:

- **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 translate key office materials, at no cost to the resident, for LEP individuals. The service offered is a contract with a provider to deliver timely and accurate translations for the appropriate language.
- **Protocol for when to use translation services:**

- o You should utilize translation services when a document is going to be released to the public and will reach an area that has a high population of LEP individuals.
- o To communicate with an LEP individual for constituent matters (this may be in the form of an email or letter)
- o **Procedure to use interpretation services:**
 - o Email the document in Microsoft Word to the Communications Manager. Contact information on page 3 of this plan.
 - o MOE Communications Manager will send the document to OIA to obtain a quote and estimated arrival time.
 - o Upon receipt of quote, MOE Communications Manager will gain approval from MOE Financial Assistant, including submitting an expense request, to proceed forward with translation.
 - o MOE's Budgeting Director will sign the quote and return it to MOE Office Manager.
 - o MOE Office Manager will return signed quote to OIA Office to begin translation service. MOIMA will send the finished product to MOE Office Manager. MOE Office Manager will send the finished product to appropriate staff member.

NOTE: Before submitting a document for translation, please review your document 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 you 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.
- Ensure that you also send a description of the purpose of the document including communication goals. If the translation is a continuation of a series or collection of documents, you may request the same vendor to keep the translation consistent.

3. Bilingual Staff:

Currently, our staff can offer translation in the following languages:

- Spanish (Offered by Antonio Romero, Priscilla Suero and William Reed)
- Twi- Maxwell Akuamoah-Boateng
- **Service Provided:** When bilingual staff is available, the MOE provides in-person translation services.
- **Protocol for when to use a bilingual staff member for translation services:**

- An individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs.
- **Procedure to use a bilingual staff member for translation services:**
 - If approached by an individual that needs translation services when you are in the office, see if any staff member is available to act as a translator at that time. If they are not, you should proceed with telephonic interpretation.

4. Training Staff on Protocols and Procedures:

The Mayor's Office of Education staff is scheduled to receive training in Spring 2019 on our Language Access Services and Protocol.

Training Protocol:

- The Mayor's Office of Education Language Access Plan & Protocol will be part of the MOE staff handbook, posted on the intranet, and provided as a hard copy to all Mayor's Office of Education staff members at hiring.
- The Mayor's Office of Education 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 technical assistance, training or receiving inbound 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.
- The Mayor's Office of Education will circulate this language access policy and related protocols to all staff within 10 days after adoption. Every two years, the Mayor's Office of Education will circulate the revised policy and protocols to all staff after adoption. Within nine months of the adoption of this policy, the Mayor's Office of Education 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 Mayor's Office of Education. 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 Mayor's Office of Education'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.

Orientation- New staff training will be provided on the Mayor's Office of Education Language Access Plan and Protocol and provide guidance on how to effectively communicate with LEP residents.

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 primary 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.
- All Staff will have access to the City of Philadelphia Language Access Cards.
- In all areas of public contact and on its website, the Mayor's Office of Education 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 front-line staff and will be aggregated via annual 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

MOE 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 Education 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.

MOE 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.

- g. If the individual is Limited English Proficient, the person's language of choice will be noted for future visits.
- a. MOE 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 MOE 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.

LANGUAGE ACCESS COMPLAINT PROCEDURE

If a person has a formal Language Access grievance with the Office of Immigrant Affairs and believes she or he has 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, please contact in person, by mail or e-mail:

Office of Immigrant Affairs
Orlando Almonte
Language Access Program Manager
1401 John F. Kennedy 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

SIGNATURE PAGE



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