

MANAGING DIRECTOR'S OFFICE LANGUAGE ACCESS MASTER PLAN (Updated 2019)

1. PURPOSE AND AUTHORITY

The Managing Director's Office 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 Managing Director's Office (MDO) personnel to follow when providing services to, or interacting with, individuals who are LEP. Following this plan and protocol is essential to the success of our mission to make our office accessible to all Philadelphia residents.

2. GENERAL POLICY

The Managing Director's Office recognizes that the population eligible for services includes LEP individuals. It is the policy of the Managing Director's Office to ensure meaningful access to LEP individuals. The Managing Director's Office adopts the following policy to ensure that LEP individuals can gain equal access to the services and communicate effectively. This Plan serves as a baseline and applies to all Managing Director's offices and programs, unless an office or program submits their own individual plan to specifically address their needs:

Administration/Policy
Community Life Improvement Program (CLIP)
Philly311
Municipal ID Program
Office of Immigrant Affairs
Office of Special Events
Office of Emergency Management
Police Advisory Commission
Office of Violence Prevention
Office of Workforce Development
Town Watch Integrated Services
Animal Control
Legal Services

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 Managing Director's

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

The Managing Director's Office, rather than the LEP client, bears the following responsibilities:

1. Provide language appropriate services.
2. Identify and record language needs of resident at the initial point of contact with staff.
3. Must 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.
5. Prohibit the requirement or suggestion 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 their primary language without the need for an interpreter.
2. Use of available, trained, competent bilingual staff for in-person or telephonic 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 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 COORDINATOR & COMMITTEE

The Managing Director's Office will convene language access coordinators from offices and programs that serve the public directly. Offices without a designated language access coordinator will contact the coordinator below to request language services:

Language Access Coordinator

Orlando Almonte
Language Access Program Manager
Office of Immigrant Affairs
Orlando.Almonte@phila.gov

Director:
Brian Abernathy
Managing Director

4. DIRECT CONTACT WITH LEP INDIVIDUALS

The Managing Director's Office has several points of contact with the public:

1. Office walk ins - The Managing Director's Office has encountered LEP individuals coming into the MDO offices looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff has access to telephonic interpretation services.
2. Office calls - The Managing Director's Office 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. Community Meetings or Events – The Managing Director's Office, or cabinet offices under the Managing Director, will convene community meetings or summits to provide information or updates to the community. Staff will request in-person interpreters for meetings or events when interaction with limited-English proficient populations is anticipated.
4. Services provided through contractors – Offices that provide services through contracts or grants shall establish and enforce language access requirements applicable to such services to ensure compliance with this plan. Compliance includes, but is not limited to, delivering programs, services and information in other languages and collecting and reporting on language access delivery data and usage. The names of contractors and services provided will be included in Appendix A of this plan and updated as they are submitted annually with annual language access reports.

5. LANGUAGE ACCESS SERVICES & PROTOCOLS

A. INTERPRETATION

To ensure that an inability to communicate in English does not deprive the public of rights and privileges, our office 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 they need, and/or
2. When a request for an interpreter is made either orally, in writing or by pointing to a language card or poster, the employee shall determine whether bilingual staff in the office is available who speaks the language being requested.

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

Telephonic Interpretation –

The Managing Director's Office can get an over-the-phone interpreter by calling the following vendor: GLOBO. This service is available 24/7.

Dial: (267) 318 – XXXX
PIN: XXXX

Enter your office pin code.

(Note: Every office and program under the Managing Director's Office has a designated PIN to access interpretation services. For your PIN, please contact the language access coordinator).

Follow prompts for language or press 0 for an operator.

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. 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 for in-person interpretation, please contact the Language Access Coordinator, Orlando Almonte, with all the details of your request including date, time, location, language, and nature of the meeting/event.

Cancellation of In- Person Interpreter

If a request in-person interpreter will not be needed, please contact the language access coordinator 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. The Managing Director's Office makes telephonic interpretation services available to all its offices and programs through GLOBO. The telephonic interpretation service is available in over 100 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train all its staff on using telephonic interpretation services.

Grow in-person interpretation services. The Managing Director's Office can offer in-person interpretation for scheduled meetings and events as needed through our vendors if given enough notice. The Managing Director's Office will continue to inform the public about these resources

through social media, visible multilingual signs and will train all 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 office 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:

1. Email the editable document to the Language Access Coordinator.
2. The Language Access Coordinator will submit the document to a vendor to obtain a quote.
3. The Language Access Coordinator will share quote with the requestor.
4. Quote is then signed and emailed back to the vendor.
5. The Language Access coordinator will then email the final translated version to the requestor once it is delivered.

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 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 the Managing Director's Office staff who are linguistically, culturally, and technically able to deliver services in a language other than English.

- Mandarin
- Spanish
- Russian

Future Plans

The Managing Director's Office will continue to collect data to illustrate and determine the demand and need of language interpretation and translation and update this list.

D. TRAINING STAFF ON POLICY, PLAN, AND PROTOCOLS

The Managing Director's Office Master Language Access Plan & Protocol will be posted online, and made available as an electronic copy to all Managing Director's Office staff members at hiring.

All staff providing technical assistance, training or receiving in-bound calls will receive training on language access and how to utilize the services.

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;
- 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.

Within a year of the adoption of this policy, the Managing Director's Office will provide training in regard to this policy and the appropriate use of interpreters and translators, to all staff who have regular interaction with LEP individuals. After their initial training, all staff members will receive refresher training on language access every two years.

Future Plans

Further standardize language access resource and tools across the Managing Director's Office. The Managing Director's Office will work with internal offices and program to update and standardize language access tools and resources across the agency, or assist in developing individual language access plans for offices/programs that have the need. The Managing Director's Office will also work to ensure that all public-facing programs have appropriate language access signage and materials in multiple languages available at program sites.

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.

Office 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 when possible. 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 Office of Immigrant Affairs can support in creating taglines.

In all areas of public contact, the Managing Director's Office 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 monitored and collected by the Managing Director's Office*:

1. Number of LEP encounters (By Language), ASL encounters
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 annually on the following:

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

Services provided through contractors and grantees

Offices that provide services through contracts or grants are required to collect and report on language access data and usage of those contractors or grantees. It is the responsibility of the office to ensure that data is being collected and submitted with their annual report.

The Managing Director's Office will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of office 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 Managing Director's Office Language Access Coordinator or Committee 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 Immigrant Affairs if you believe you have been wrongly denied the benefits of this Language Access Plan. You must file your complaint within six 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 contact PCHR at 215-686-4670

For more information on the Philadelphia Commission on Human Relations, 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 office responsible for its implementation.

Major milestones in our plan will include:

- Train frontline/public facing staff
- Set up systems to collect data
- Identify, collect, and expand on translated documents

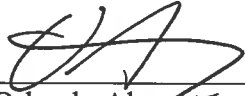
Timeline

2019

- Continue training staff and collecting data
- Establish internal policy for event interpretation requests and best practices
- Explore additional training opportunities for staff, including online trainings

The Managing Director's Office will adjust and update this plan as needed.

10. SIGNATURE PAGE



Orlando Almonte

Language Access Coordinator/Program Manager
Managing Director's Office



Brian Abernathy

Managing Director